

We, the Sydney Knitting Nannas and friends are a group of older citizens who actively engage in whatever democratic avenues are available to advocate to save the land, air and water for future generations. We are connected to other Knitting Nanna groups, both rural and urban. We have a deep commitment to supporting all measures to address the critical phenomenon effecting our and future generations: Climate Change.

We welcome the opportunity to make a submission regarding the Boggabri Modification 10 application.

The Mod 8 and Mod 10 need combined assessment as a new project.

We argue firstly that to name this application a modification is a misnomer. This application is of a size that demands the full scrutiny that a new project must undergo. Modification 8 was approved after it had been reduced in size by more than half, following the advice of the Department of Planning. Now a year and a half later the Modification 10 application combined with the Mod 8 approval amount to approximately 60 billion tons of coal mined (the volume of the original Mod 8 application, before reduction). It would appear the two combined were split up to avoid the scrutiny of a new mine application, to avoid independent overview, community opinion and expert advice. Several other applications have been or are currently being assessed with greater scrutiny, yet their volume is half the combined Mod 8 and Mod 10 application: for example the Wilpinjong Extension, the Moolarben OC3, the Newstan Mine Extension Project and the Chain Valley Consolidation Project. This Mod 10 application must, with the Mod 8, be treated as one huge application and receive the highest possible scrutiny. The combined modifications are a 15-year extension to 2040!

This proposal jeopardises NSW legislated Net Zero obligations. The level of climate pollution is unsustainable.

We recently wrote a submission following the Net Zero Commission's 2024 report. It was clear that the NSW government was not meeting its emissions reduction targets. The area of most concern was the resources sector. It is alarming to see coal project applications receiving consideration, let alone approvals when the Net Zero commission is calling for decisive action to address this emissions reduction failure.

Boggabri Mod 8 was approved by the NSW Department of Planning, Housing and Infrastructure, stating that increased GHG emissions were acceptable partly because NSW would still meet 2030 and 2035 GHG reduction targets.

“The Department notes the advice from NZEM that the predicted GHG emissions from the modification are already included in the forecast modelling against these targets. The Department considers that the modification is consistent with current NSW and Commonwealth policy settings in regard to GHG emissions.”

Since that approval the Net Zero Commission's updated report contradicts that assumption and raises the alarm that NSW is failing to meet set targets. In fact, Boggabri coal mine emissions are at their highest levels since the Safeguard Mechanism was introduced in 2017. Idemitsu states in their application that the GHG emissions will increase and remain elevated. This contradicts the EPA's guide for Large Emitters which states that high-emitting development approvals must align with the overall NSW net zero emissions trajectory. Boggabri Mod 10 must be rejected for its clear failure to meet its net zero obligations.

This application by Idemitsu for 2036 to 2040 is essentially land banking. No application should be considered so far into the future when global warming is accelerating faster than most predictions, and the IPCC is calling for no new fossil fuel projects.

Critically endangered flora, fauna and ecosystems will be destroyed.

Besides the alarming increase of climate pollution, the impact on nature is of grave concern. Mod 10 will remove a further 85 hectares of land which is home to many endangered species of flora and fauna, including koalas, quolls, woodland birds, bats and the critically endangered Regent Honeyeater (300 still existing)[1] and Swift Parrot (500 still existing)[2]. The application failed to even include consideration of the Swift Parrot.

The land clearing of Boggabri, Tarrawonga and Maules Creek mines has been like death by a thousand blows for the endemic species of the Leard Forest. If this Mod 10 is approved, the narrow 500 metre corridor remaining will be subject to noise, blasting and dust of mega mines on both sides. The unique ecosystem of Leard Forest and its critically endangered animals will have little chance of survival.

The water usage proposal is not accounted for. It will cause permanent destruction of water sources and aquifers.

The proposed water usage for Mod 10 for both surface water and ground water cannot be reconciled with what is available; what needs to be legally withheld for agriculture and the health of the local population, and the damage it will cause to critical natural water systems.

The footprint of the mine will destroy the catchment of the Nagero Creek and the cumulative drawdown of the Nagero Creek alluvium will be a breach of the Aquifer Interference Policy, adversely affecting downstream communities of the Murray-Darling Basin and local communities into the future. This cumulative impact alone should be basis for rejection of Mod 10.

Each year the project will exceed water licences by 690ML as it will need 2,040ML per year to maintain dust control measures. Any proposal to purchase further water titles will impact local communities and agriculture. There have already been dry times when

there is no availability, and this is likely to happen more frequently with global heating. It should be noted that Idemitsu has previously been guilty of taking more than one billion litres of water during the drought without a licence.[3] The conditions are very clear that projects must have the water entitlements they need to cover their water use, if they are to receive approval. The Modification should be rejected on this basis.

In summary, there are several grounds for the rejection of this application.

- The Mod 8 and Mod 10 need combined assessment as a new project.
- This proposal jeopardises NSW legislated Net Zero obligations. The level of climate pollution is unsustainable.
- Critically endangered flora and fauna and ecosystems will be destroyed.
- The water usage proposal is not accounted for and will cause permanent destruction of water sources and aquifers.

Any one of the above grounds for rejection would be sufficient to reject Mod 10 and we therefore strongly object to the proposal.

On behalf of Sydney Knitting Nannas

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[1][Swift parrots still in peril, despite revised numbers of surviving birds due to new counting method - ABC News](#)

[2][What will it take to save the regent honeyeater? | Australian National University](#)

[3]<https://www.abc.net.au/news/2023-07-05/idemitsu-boggabri-coal-mine-water-licence-breach/102562394>

