

Date: 9 July 2025

Objection to Boggabri Coal Mine Modification 10 (MOD 10)

I object to Mod 10.

MOD 10 must be rejected for its:

- Significant and unmitigated increases in greenhouse gas emissions;
- Hydrologically risky and non-compliant final landform (final void);
- Inadequate application of the precautionary principle;
- Weak and flawed Social Impact Assessment;
- Misalignment with NSW climate goals and the urgent need to transition from fossil fuels;
- Cumulative environmental degradation, including water extraction, air quality impacts, and biodiversity loss.
- The economics don't stack up.

Key Issues and Recommendations

1. Climate Impacts and Emissions

MOD 10 will increase Scope 1 emissions dramatically, quadrupling fugitive methane emissions compared to previous years. Methane is 80 times more potent than CO₂ over a 20-year period. The Department acknowledges this but defers action to post-approval management plans, this fails the precautionary principle and increases risks during a climate emergency.

Recommendation: Reject MOD 10. NSW cannot credibly meet its net-zero goals while approving projects that significantly increase emissions beyond 2030.

2. Failure to Uphold the Precautionary Principle

NSW law mandates that where threats of irreversible harm exist, lack of scientific certainty cannot justify deferring preventative measures. The risks related to groundwater drawdown, Groundwater Dependent Ecosystems impacts, and fugitive emissions are serious and inadequately addressed in MOD 10.

Recommendation: Apply the precautionary principle rigorously. Defer or reject the application until independent assessment confirms environmental safety and feasibility of emissions mitigation.

3. Inadequate Water and Groundwater Modelling

MOD 10 relies on assumption-based, proponent-modified groundwater modelling, predicting drawdowns in the Namoi Alluvium of up to 5m, despite lacking robust verification. Water-stressed communities and ecosystems are being exposed to serious risk.

Recommendation: Require independently verified hydrological modelling and reject any proposal that cannot demonstrate water neutrality in the Namoi catchment.

4. Final Void is Unacceptable

The proposed final void:

- Violates the Planning Assessment Commission (PAC) 2012 recommendations, which rejected long-term voids;
- Is hydrologically disruptive and visually intrusive;

- Is inconsistent with international best practice in mine rehabilitation;
- Permanently degrades land and water function for 1,000+ years;
- Is justified only on cost grounds, which is unacceptable.

Recommendation: Reject MOD 10 unless the proponent commits to full backfilling of the final pit and restoration of natural hydrology in line with global rehabilitation standards.

5. Flawed and Narrow Social Impact Assessment (SIA)

The MOD 10 SIA:

- Minimises community concerns;
- Excludes or marginalises First Nations, young people, and vulnerable rural groups;
- Ignores the social dimensions of climate change (e.g., health, displacement, stress);
- Frames rural communities in purely economic terms, disregarding lived experience and cultural connection to land.

Recommendation: Reject the project until a full, inclusive, and climate-aware SIA is conducted, integrating Indigenous perspectives, youth voices, and intergenerational concerns.

6. Non-Alignment with NSW's Legal and Policy Frameworks

MOD 10 contradicts:

- The Protection of the Environment Administration Act 1991, specifically the principles of intergenerational equity, precaution, and ecologically sustainable development;
- The NSW Climate Change Policy Framework (net-zero by 2050);
- NSW Government commitments to the Paris Agreement and the IEA's call for no new coal.

Recommendation: Reject MOD 10 to maintain policy coherence, uphold legal obligations, and align with international climate action frameworks.

7. Cumulative Impacts Already Evident

The impacts from mining including MOD 8—ongoing dust, noise, and water stress—are already affecting our region's liveability, food production, and social cohesion. MOD 10 further exacerbates these harms. The claim of "no material additional impact" fails to reflect lived realities and regional data.

Recommendation: Assess MOD 10 as a de facto new project, not a continuation, due to the scale of environmental change and cumulative risk.

8. Tyre Burial and Regulatory Failures

The burial of nearly 1,000 five tonne mining truck tyres (2014–2020), without appropriate licence conditions, is a serious breach of environmental protection. The continued allowance of such practices under "practicable" standards encourages further pollution.

Recommendation: Cease all tyre burial approvals in Leard Forest and revoke permissive EPL variations. Mandate tyre recovery and environmentally sound disposal methods.

9. Opportunity Cost and Economic Transition

NSW is Australia's largest economy, yet MOD 10 delays the necessary transition to a diversified, climate-resilient rural economy. The claimed \$276 million net benefit ignores:

- The true social cost of carbon;
- Future climate adaptation costs;
- The risk of economic disruption from stranded coal assets;
- Long-term damage to agriculture, biodiversity, and public health.

Recommendation: Prioritise investment in regional renewable industries, regenerative agriculture, water infrastructure and youth training programs over short-term coal profits.

MOD 10 must be rejected. The NSW Government has an opportunity to uphold legal, environmental, and moral responsibilities to current and future generations. To approve this project would be to ignore climate science, legal precedent, and the lived experiences of the people of Maules Creek and the broader Namoi region.

I call for:

- Immediate rejection of Boggabri Coal MOD 10;
- Implementation of full final void infill and mine rehabilitation;
- Prohibition of in-pit tyre burial;
- Transparent and inclusive planning assessments going forward;
- Investment in sustainable and climate-resilient rural futures.

We need climate stability and this will be the basis of the next steps forward. This Mod 10 decision must reflect a direction that prioritises the wellbeing of communities the protection of our healthy landscapes, biodiversity, water and support the resilience of our young people and future generations rather than reliance on fossil fuels.

Libby Laird
Maules Creek.

