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Submission of Objection: Moolarben Mine Stage 1 Modification 9

Nature Conservation Council of NSW (NCC) objects to the proposed Moolarben Mine Stage 1 Modification 9 because the cumulative impacts will be far greater than implied in the assessment report.

NCC is concerned this proposal has been developed and submitted to the Department of Planning and Infrastructure without the guide of Director-General's Requirements for the assessment procedure. The proposal to extract a further 30 million tonnes of coal through open-cut operations and extend the life of the mine by five years is a significant expansion of the current approval.

NCC is also concerned that this mine expansion proposal has been submitted before a determination has been made on the Moolarben Stage 2 proposal.

The proposal to expand the footprint of the currently approved open-cut mining operations by a further 25 per cent will have significant cumulative impacts on the surrounding environment and amenity of the area.

The assessment report is not adequate in identifying key cumulative impacts of the existing large mining operations in the Ulan/Wollar area adjacent to the Goulburn River National Park and Munghorn Gap Nature Reserves on the headwaters of the Goulburn River.

The assessment for Moolarben Mine Stage 1 Modification 9 fails to identify the cumulative impacts on the following significant environmental features in the local area:

1. Loss of good-condition critically endangered ecological community White Box Yellow Box Blakely's Red Gum Grassy Woodland and derived native grassland;
2. Loss of limiting habitat features, including tree hollows and rocky outcrops;
3. Impacts on habitat for threatened woodland birds, including Regent Honeyeater, Turquoise Parrot, Diamond Firetail, Brown Treecreeper, Powerful Owl and Masked Owl;
4. Impacts on habitat for threatened microbats; and
5. Impacts on the health and ecology of the Goulburn River and its tributaries.

The proposal to continue to destroy vegetated ridgelines in the area is unacceptable. These important landscape features are irreplaceable and have a significant influence on the local microclimate.

NCC is of the opinion that the cumulative impacts on air, noise and water pollution have not been adequately assessed for this proposed large mine expansion.

NCC also objects to the proposal's impact on 33 recorded Aboriginal cultural heritage sites. The assessment judges all of these to be of low significance without having carried out the full suite of archaeological work required to identify significant features, particularly in potential archaeological deposits (PADs) within rock shelters.

The assessment does not identify the cumulative loss of archaeological sites in the local area caused by currently approved or proposed open-cut mining operations.

NCC is of the opinion that the economic assessment for Moolarben Mine Stage 1 Modification 9 carried out by Gillespie Economics Pty Ltd is inadequate and that an independent assessment that fully considers the long-term costs of the proposal needs to be conducted, particularly the long-term costs to the local community of increased drought, bushfire and extreme storm events.

The proposal to increase greenhouse gas emissions by 27,434,059 tonnes of CO₂ equivalent per year is totally unacceptable and should not be approved.

NCC does not agree that the proposed Biodiversity Offset Strategy will adequately replace proposed loss of good-condition habitat and critically endangered ecological communities, significant landscape features and Aboriginal cultural heritage sites.

NCC strongly objects to this proposal being assessed by the Department of Planning and Infrastructure before 'The Drip', an iconic natural feature in the regional landscape, is protected within the Goulburn River National Park.

In conclusion, NCC is of the opinion that Moolarben Mine Stage 1 Modification 9 is an ecologically unsustainable development that will cause significant intergenerational impacts. Consequently, the proposal should not be approved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Clarke', with a stylized, flowing script.

Pepe Clarke
Chief Executive Officer
Nature Conservation Council of New South Wales