



Department of Planning, Housing and Infrastructure
Attention: Brittany Golding
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10 July 2025

Dear Ms Golding

Re: Submission - Boggabri Coal Mine Modification 10 (MP09_0182-Mod-10)

I refer to the public exhibition (Case ID PAE-86042206) for the abovementioned Modification No.10 to Boggabri Coal Mine, which seeks approval for the extension of mining operations towards the north-west, beyond the currently approved Mine Disturbance Boundary, whilst remaining within the BCM Project boundary.

On review of the Modification proposal and the documentation placed on exhibition, Council wishes to make the following submission to ensure that the impacts that the current project and the proposed modification has on the Gunnedah Shire, are considered. Council requests that should the consent authority decide to approve the Modification to the Development Consent, the following matters are appropriately considered.

It is noted that Modification 10 does not seek to make changes to operational hours, mining methods, mining related infrastructure, water management system, coal-handling, processing and transport methods, and rates and access to the mine site. While the mining operations are located wholly within the Narrabri Shire, given the proximity of the Gunnedah Shire and Gunnedah township and the significant number of employees and contractors choosing to reside in the Shire and commute to the development site, Council is of the opinion that there will continue to be direct impacts associated with the operations and Modification 10.

The following impacts of the Modification are restated.

1. Potential positive accumulative impacts relevant to the Gunnedah Shire:
 - Capacity to provide enhanced opportunities for local employment and training for Shire residents;
 - Opportunity to support businesses and industry in the Gunnedah Shire through an ongoing commitment to local procurement;
 - The provision of financial contributions that support positive social outcomes, social infrastructure investments and/or community resilience improvements;
 - Ongoing contribution to the region's economic resilience; and
 - Contribution towards the population growth of the Shire.
2. Potential accumulative negative impacts relevant to the Gunnedah Shire:
 - Ongoing community anxiety and concerns around overall environmental impacts of mining and climate change:
 - Concern in relation to equity of access to groundwater licenses and the ongoing preservation and security of groundwater supply;
 - Continued negative impact on housing and rental market availability and affordability;
 - Continued pressure on the availability of childcare places:
 - Continued negative impact on childcare supply and demand with wait lists extended beyond current timeframes: and.
 - Increased demand on Council, health, social support and emergency services by both domiciled and transient workers and immediate and extended family members.

Section 4.55 EPA Act 1979

In accordance with Section 4.55(1A) and (2) of the Environmental Planning and Assessment Act 1979, the consent authority must be satisfied that the Modification is substantially the same development as to which consent was originally granted. Council believes that the Social Impact Assessment (SIA) submitted within the proposed modification documentation, has determined that the impacts from the mine should not be considered substantially the same as the original development without appropriate controls or conditions being put in place to lessen the impact on the Gunnedah community. Similar to how this was applied to the Narrabri Shire for the original development.

Council considers that the Social Impact Assessment (SIA) has determined that the distribution of workforce is disproportionate between the Gunnedah Shire and Narrabri Shire with a significantly greater impact being felt on the Gunnedah community to that of the Narrabri Shire. In Section 3.3.2 it is identified that the majority of the BCOP employee and contractor workforce resides in the Gunnedah Shire, 244 (42%) and 80 (37%) respectively. While only 110 (19%) employees and 37 (17%) contractors reside in the Narrabri Shire. It is noted that the community impacts were addressed with the entering into of a Voluntary Planning Agreement (VPA) between Narrabri Shire Council and the proponent during the determination of the original development application. This modification gives the opportunity for the developer to address the impacts to the Gunnedah Shire with a similar condition and agreement.

Council believes that the Modification should include a condition for a VPA requirement with Gunnedah Shire Council within Schedule 2, Condition 23 SSD09_0182. This is to ensure that the development can be regarded as substantially the same as the conclusions drawn from the original development determination, which required the creation of a VPA to offset the community impacts created by the development on the affected communities.

Social Impact Assessment

Gunnedah Shire Council has previously provided comment on the 2023 Social Impact Management Plan (SIMP) which was finalised in 2024. Based on the information that was contained within the Social Impact Assessment (SIA) it does not appear that Council's previous comments have been considered. In providing feedback on the SIA, Council reaffirms its commitment to the feedback provided on the 2023 Social Impact Management Plan (SIMP).

The following are the key comments of the concerns around the Social Impact Assessment that was conducted and included within the Modification 10 application:

1. Community Engagement, and Data Collection:
 - Council once again acknowledges the Project's efforts to engage with stakeholders across the region. The Gunnedah Shire continues to experience significant economic and social growth and reinforces that ongoing meaningful and timely engagement with key stakeholders including Gunnedah Shire Council is expected.
2. Workforce Residential Location – 3.3.2:
 - It is noted that the SIMP indicated that the "mine has reached maximum workforce numbers and the workforce is anticipated to remain stable i.e. approximately 740 FTE, and a peak FTE workforce of up to 876". The SIA affirms that in 2024 approximately 805 personnel including employees and contractors are employed. Almost 40% of the total employee and contractor workforce reside in the Gunnedah Shire, double the amount in Narrabri and Tamworth combine. Council made the comment to the SIMP that if the latter workforce number was reached then social impacts in relation to the number of personnel opting to reside in the Gunnedah Shire would be further increased. Council's comment appears to be well founded.
 - With no apparent formal process in place, Council advocates for the prioritisation and consideration of employing local, and for any efforts to incentivize young people to move into the mining sector where relevant, when any future recruitment is required.

- Skills and labour shortages exist within the Gunnedah Shire. Ensuring strategies are in place to address the migration of trained workers from local businesses to the mining industry, and to ensure each industry in the Shire has sufficient resources to thrive is of paramount importance to Council. Displacement of employment opportunities from the agricultural sector also needs to be considered within the social and economic assessments. Training programs, graduate placements in industry and community grants grow human capital by building competence, skills and knowledge, education and experience. Jobs creation in the mining sector and associated industries supports the retention of young people in the Gunnedah Shire and the availability of jobs that the increased mining operations will bring, over time, the potential to draw young people back to their community to work, live and raise families.
 - 2021 ABS Census data shows that the 15.6% of Gunnedah Shire and 16.9% of the Narrabri Shire identifies as First Nations. With only 5% of the operation's workforce identifying as First Nations, the lack of management measures and commitment around enhancing overall access to employment, training, traineeships and apprenticeships is disappointing. Council will always advocate for ongoing efforts to be made to achieve an employment target of at least 10-15% in First Nations employment and to proactively source Aboriginal and Torres Strait Islander trainees and apprentices from within the surrounding local communities to future proof those Shires.
3. Other Approval Conditions – 3.6.2
- Council considers the housing commitment as stated in the SIA to be inequitable and at odds with the Statement of Commitment No 30 to ensure the Project does not have a material impact on housing availability and affordability in the Narrabri and Gunnedah Shires. Council once again encourages the operations to reconsider its housing commitment and investment in the Gunnedah Shire.
4. Farming Communities Conditions – 3.6.2.1
- 3.6.2.1 states “the purpose of the farming communities’ conditions is to ensure that impacts to agricultural productivity are minimised and to mitigate the cumulative pressures on the farming community”. To that end the development should clarify the commentary around drawdown. Water balance should consider water saving practices that can be implemented in lower rainfall periods and reduce the reliance on purchase of water licenses as the competition for water licenses can lead to significant economic impact on local producers, with mining operations historically inflating water license prices. Mines should not monopolise water licenses and be dependent on purchasing licenses in times of low rainfall.
5. Housing Commitment – 3.6.2.2
- The Boggabri Coal Housing commitment and focus solely on increasing housing supply in Boggabri and Narrabri is disappointing. As stated in Council's response to the SIMP, the housing market impacts associated with the operations are significant to the Gunnedah Shire. As previous noted, in Section 3.3.2 of the SIA it is identified that the majority of the BCOP employee and contractor workforce resides in the Gunnedah Shire, 244 (42%) and 80 (37%) respectively. While only 110 (19%) employees and 37 (17%) contractors reside in the Narrabri Shire. It is obvious this trend will continue, as workers opt for lifestyle and quality of housing and liveability over proximity to the mine site. Findings in the Gunnedah Shire Local Housing Strategy, clearly show that the current median house price in Gunnedah while marginally lower than Narrabri, is higher than both Tamworth and Boggabri and with the current population growth trends, a further 580 dwellings will be required by 2041 to meet housing demand
 - Gunnedah Shire is already experiencing impacts through the lack of availability of doctors and police presence within the Shire with the availability of suitable housing a key barrier. The extension of the mining operations life by an additional four years will continue to drive up the cost of housing and rentals in the Shire, forcing local residents and those unable to compete with mining salaries out of the market and out of the Shire. The village of Curlewis, 19klm south of Gunnedah has already seen a significant increase in property prices in the last 12-18 months and is now considered by residents to be a ‘mine village’.

- The scope of the housing commitment suggests that an annual review and the SIMP review process will ensure that BCOPL will remain 'informed' of local housing market conditions and potential impacts. However, references to review triggers, timeframes and methodology for allocation of additional dwellings across the three Shires in the final SIMP, remain vague and non-committal.
6. Community Contributions and Voluntary Planning Agreements (VPA) – 3.6.4
- It is Gunnedah Shire Council's view that the Social Impact Assessment does not adequately address key economic and social impacts and pressures that the additional increase in mine life by 4 years places on the community. Despite feedback provided to inform the SIMP and comments made on impacts on housing, access to emergency and medical services, childcare and projected population growth, the SIA's narrative remains Narrabri centric and inequitable in its response. Section 2.5 of the Executive Summary notes that there is an existing VPA with Narrabri Shire Council and that there is no further impact from the modification proposal. However, there is no information regarding any proposed VPA proposed for Gunnedah Shire Council, to which the SIA has concluded there is a greater social impact based on a 36% (Gunnedah) to 8% (Narrabri) place of residence of the surveyed workforce, with almost 400 surveys completed. Hence, the modification does not address how the development will adequately manage the social impacts to the Gunnedah Shire community.
 - The Gunnedah township is recognised as the main mining industry service centre of the Gunnedah Basin, and Council considers the formulation of a VPA as an essential next step to offset any negative economic and social implications that this development and Modification will incur on the wider Gunnedah Shire. Historically developers have been unable to enter into VPAs with other Shires where the development location is not physically within the boundaries of the local government area. However, this system was flawed as it did not account for the social and economic impacts that could be created across LGA boundaries by development such as this one.
 - The Idemitsu Boggabri Coal operation has operated with a large percentage of its workforce choosing to reside within the Gunnedah Shire since 2006 with Gunnedah Shire Council and the community having to address the social and economic impacts that this creates. Social and economic impacts from the development and an extension of mine life by 4 years, does not only derive from the number of employees or contractors employed at the mine, but also family members of workers residing within these communities and the additional pressures that these create for our Shire.
 - Legislation now allows for VPAs with communities such as ours, that are significantly impacted by a development in an adjoining Shire. Now that there is an opportunity for a VPA to be discussed, Council requests that the impacts from the development be appropriately addressed through a VPA or other similar means. With the Narrabri Shire VPA yielding \$15,341,899 including \$6,641,890 in royalties, it is reasonable to expect that VPA contributions would be apportioned based on the percentage of impact on the Gunnedah Shire.
 - Council would consider commissioning the development of an Infrastructure Services Impact Model (ISIM) for the Project to estimate the impacts of mining activity on the Shire's population and on a number of (selected) professional and community services as well as road infrastructure, in order to inform the development of a Voluntary Planning Agreement.

Groundwater Impact Statement

The Modification Report references 1.3-5.1m drawdown on ground water. However, the Groundwater Impact Assessment Report refers to a maximum predicted drawdown of 3.4m as per table 9.2, at the greatest point. Clarification on the change to drawdown and the total drawdown from the project in total is required.

The water balance should consider water saving practices that can be implemented in lower rainfall periods. It is Council's view that these should be triggered based on a certain average rainfall precipitation level, to ensure that there is no reliance on purchase of additional water licenses. The purchase of water licenses during low rainfall (drought) periods has led to significant economic impact on local farmers, with mining operations historically artificially inflating water license prices.

This has resulted in farming and agriculture being priced out of the market. The Department should ensure that mines do not monopolise water licenses and be dependent on purchasing licenses in times of low rainfall. As previously stated this results in undue social impacts to the agriculture sector within the surrounding Shires, and the continued operation and production capacity of primary agricultural industries that are another pivotal pillar within the local economy.

Council wishes to reaffirm that this submission is not an objection to the modification of consent application. However, Council believes that the assessment and the Modification has not adequately considered and accounted for the impacts to the Gunnedah Shire. Council also believes that adequate practices and action can be put in place by the development to lessen those impacts on our community.

If you have any questions regarding this matter, please contact me on 02 6740 2100.

Yours faithfully



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