

Our Reference: WB:MH: 2280898
Your Reference: SSD-09 0182 Mod10
PAE-86042207
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Tuesday 24 June 2025



RE: Boggabri Coal Mine – Modification 10 (SSD 09_0182 MOD 10)– Advice on Modification Report (PAE-86042207)

Thank you for the opportunity to provide advice on Modification 10 (MOD 10) to State Significant Development (SSD) 09_0182 for the Boggabri Coal Mine (BCM). This submission has been prepared following a review of the Modification Report (May 2025) prepared by Xenith Consulting on behalf of Boggabri Coal Operations Pty Ltd (BCOPL). It is understood that MOD 10 proposes the following key changes:

- **Extension of Mining:** 85 ha additional disturbance within the Project Boundary to extract an additional 30 Mt of Run of Mine (ROM) coal.
- **Mine Life Extension:** 4 more years, moving the closure from 2036 to 2040.
- **No Changes** to Annual coal production limits, processing methods, infrastructure, workforce, or operating hours.

1. General Position

Council acknowledges the economic contribution that Boggabri Coal Mine provides to the Narrabri region, including local employment, procurement, and royalties. Subject to appropriate environmental management and regulatory oversight, Council does not object to the progression of MOD 10 and provides the following comments for consideration.

2. Environmental Considerations

a) Groundwater and Surface Water Impacts

Council notes that groundwater drawdown resulting from MOD 10 remains within the thresholds under the NSW Aquifer Interference Policy, and any exceedances in water licensing entitlements will be addressed by BCOPL.

Recommendations:

- Require verification of additional water entitlements before extended operations.
- Maintain community access to local water resources with public reporting.
- Small exceedance (2 ML/year) from Maules Creek alluvium in 2040; evidence of additional water licenses should be provided.



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b) Biodiversity

MOD 10 has been deemed a Controlled Action under the EPBC Act, recommendations:

- Make the updated Biodiversity Offset Strategy publicly available.
- Report progress on offset credit acquisition in annual environmental reviews.

3. Strengthen Monitoring Plans:

- Update water, noise, and air quality monitoring to address MOD 10 changes.
- Periodic independent audit should assess performance against the updated management plans.

4. Social and Economic Impacts

- Collaborate with local and state agencies to manage cumulative infrastructure pressures.
- Review and Update Social Impact Management Plan as relevant to address any changes subsequent to MOD 10.

5. Final Landform and Rehabilitation

Council supports a self-draining and stable final landform. Recommendations:

- Include Council in the finalisation of the Final Void and Mine Closure Plan.
- Final Landform and Closure Plan should be revised in line with MOD 10 outcomes (Schedule 3, Condition 74).
- Establish clear timelines and progressive rehabilitation targets.

6. Compliance and Engagement

- All Liquid Trade Waste Agreements and any Approvals for wastewater should be reviewed and amended plans submitted where required to accommodate the proposed additional wash bays and shower/toilet facilities, to ensure any system can withstand the increased loads.
- Maintain Community Consultative Committee meetings.
- Publish plain-language updates on key environmental and rehabilitation indicators.

Conclusion

Subject to appropriate environmental safeguards and compliance, Council supports MOD 10 as consistent with the objectives of the Environmental Planning and Assessment Act 1979.

Council trusts that the above advice provides the necessary assistance and thanks you for the opportunity to provide input. We look forward to continuing our constructive relationship with BCOPL and the Department.

Should you have any further questions or require any further clarification on the contents of Council's correspondence, please contact Michelle Castles, Council's Manager Planning and Development on (02) 6799 6866 or via council@narrabri.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Bill Birch', with a stylized flourish at the end.

Bill Birch

Acting Director Planning & Sustainability