

Our Reference: MC: 2292632
Your Reference: SSD-63428218
PAE-86531966
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RE: Maules Creek Continuation Project (SSD-63428218) – Advice on EIS

Thank you for the opportunity to provide advice on the EIS for the Maules Creek Continuation Project (SSD-63428218). It is understood that the project would allow for the extraction of additional coal adjacent to the approved MCCM open cut pit within existing mining and exploration tenements and involves the following activities:

- continuation of open cut operations to allow mining of additional coal reserves until approximately 2045;
- extraction of approximately 120 million tonnes (Mt) of ROM coal (in addition to the approved MCCM 240 Mt coal resource);
- extraction of up to 14 Mtpa of ROM coal (i.e. a 1 Mtpa increase from the currently approved maximum ROM coal mining rate of 13 Mtpa);
- continuation of employment of the workforce until 2045;
- continued operation of the existing CHPP and train load-out and rail spur infrastructure, with upgrades as required;
- continued transport of up to 12.4 Mtpa of product coal via rail
- development of an integrated waste rock emplacement landform that incorporates geomorphic design principles;
- construction of a remote go-line, access and infrastructure area;
- continued operation and extension of the MCCM water management system;
- continued operation and extension of the MCCM power reticulation system;
- construction of a water transfer pipeline between the MCCM water pipeline network and the approved Vickery Coal Mine (VCM) to Tarrawonga (TCM) pipeline;
- ongoing exploration activities and other associated infrastructure, equipment and activities.



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Council recognise the economic significance of the Maules Creek Coal Mine to the regional economy. However, Council are also mindful of the need to ensure that any proposed continuation of mining operations is appropriately balanced against potential environmental, cultural, social, and cumulative impacts.

Following review of the documentation, we provide the following comments for further consideration:

1. Environmental Impacts, Biodiversity, and Biosecurity

Council acknowledges the EIS includes assessments on significant ecological communities and threatened species such as the White Box, Yellow Box, Blakely's Red Gum, Grassy Woodland, Koala, and Swift Parrot. However, the EIS lacks consideration of biosecurity risks associated with the proposed rehabilitation and infrastructure.

Vegetated rehabilitation zones and minimal-disturbance approaches may increase the risk of pest plant and animal species establishing post-mining. These risks should also be addressed. Council recommendations:

- Implementation of a Biodiversity Offset Strategy in accordance with overarching legislative requirements, with local offset areas prioritised within the local government area.
- Inclusion of a Biosecurity Management Plan addressing pest monitoring and access protocols for Biosecurity Officers and land managers during and after mining.
- Independent monitoring of biodiversity outcomes reported annually and made publicly available.

2. Water Resources, Hydrology, and Catchment Impacts

The EIS identifies that the project will increase the catchment area diverted to Back Creek. Further consideration should be given to the risk of downstream flooding and potential for property impact.

A robust Water Management Plan should address cumulative impacts, groundwater drawdown limits, trigger thresholds, and contingency actions. It should also include downstream user consultation in water monitoring and reporting processes.

Any expansion to infrastructure, including mobile crib huts and refuelling areas, should incorporate EPA-approved wastewater and petrochemical management systems in line with the *Protection of the Environment Operations Act 1997*. This includes bunding, spill response, and Liquid Trade Waste (LTW) controls. Increased workforce size should also be factored into wastewater treatment capacity planning.

Council recommendations:

- Hydrological modelling and engagement with affected landholders to mitigate flood risk.
- A robust Water Management Plan, addressing cumulative impacts, groundwater drawdown limits, trigger thresholds, and contingency actions.
- Inclusion of downstream user consultation in water monitoring and reporting processes.
- Incorporate EPA-approved wastewater and petrochemical management systems

3. Air Quality and Human Health

Council is generally satisfied with the proposed Air Quality Management Plan, including real-time monitoring and exceedance reporting.

- Continued EPA oversight is welcomed.
- Implementation of an Air Quality Management Plan with real-time monitoring, publicly accessible data, and proactive dust suppression measures, particularly during dry and windy periods.

4. Aboriginal Cultural Heritage

Council continues to recommend a Cultural Heritage Management Committee, inclusive of local Aboriginal representatives, to oversee ongoing site assessments and cultural values management.

5. Socio-Economic Considerations

Council notes the Social Impact Assessment Report submitted is based on data collected between June 2023 and September 2024.

- A new social impact management plan (SIMP) should be prepared and implemented with consideration to this recent report.
- Further consideration should be given to the impacts of the project on community facilities, infrastructure and services, for example, population decline in Maules Creek area, housing and accommodation, employment, training, community wellbeing and engagement.
- Preferential employment and procurement for local residents and businesses.
- Development of a Community Benefits Agreement that supports local community infrastructure, training, health, and environmental programs.

(Council acknowledge Whitehaven has taken steps to commence early discussions related to a proposed planning agreement (PA) for the Project).

6. Rehabilitation and Final Land Use

A detailed Rehabilitation and Mine Closure Plan, including final landform objectives, success criteria, and funding mechanisms to ensure long-term maintenance should be considered. This plan should ensure post-mining access for biosecurity monitoring and pest management and clearly define long-term site responsibilities and funding commitments.

7. Ongoing Stakeholder Engagement

Continuation and resourcing of a Community Consultative Committee (CCC), with council representation.

Council thanks you for the opportunity to provide input. Should you have any further questions, please contact Ms Michelle Castles, Council's Manager Planning and Development on (02) 6799 6866 or via council@narrabri.nsw.gov.au.

Kind Regards,



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