

Our Reference: DA:MH:2111836
Your Reference: SSD:63428218
PAE-63434464
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Tuesday 7 November 2023

RE: Maules Creek Continuation Project (SSD-63428218) – Advice on SEARs (PAE-63434464)

Thank you for the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) for the Maules Creek (MCCM) 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 within Coal Lease (CL) 375, Mining Lease (ML) 1701, ML 1719 and Authorisation (AUTH) 346 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 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



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- other associated infrastructure, equipment and activities.

1. Biodiversity

- i) Clearing of vegetation should be minimised wherever practicable. Impacts of construction, including clearing of potentially threatened flora, fauna and ecological communities, should be investigated thoroughly and a detailed biodiversity development assessment report prepared.
- ii) Further assessment should be undertaken to determine the presence of any threatened ecological communities (TECs) and threatened or migratory species within the investigation area.
- iii) Investigation and development of a biodiversity offset strategy should be undertaken in accordance with overarching legislative requirements.

2. Aboriginal Cultural Heritage

The area may hold cultural significance to First Nations people including cultural heritage sites, and more broadly, the cultural heritage value of the environment generally. A detailed Aboriginal Cultural Heritage Assessment should be undertaken as part of the EIS documentation including consultation with Registered Aboriginal Parties (RAPs).

3. Air

An updated air quality assessment report should be undertaken including air quality impacts as a result of both construction and ongoing mining operations. This should also include detailed assessment on the cumulative impacts resulting from the proposed project and other mining activities in the area (e.g., BCM, TCM, VCM) and investigate measures to monitor, avoid and mitigate any potential impacts.

4. Noise and Vibration

Operation of machinery during construction, including clearing and excavation, would generate noise with the potential to affect sensitive receptors such as rural residences. Operation of the project would also generate noise and/or vibration related to the expanded mining operations, vibration and overpressure as a result of blasting, increase to road and rail traffic - a detailed Noise and Vibration assessment should be undertaken to further understand these impacts and to

identify and implement mitigation measures to manage these impacts. This should also include detailed assessment on the cumulative impacts resulting from the proposed project and other mining activities in the area (e.g., BCM, TCM, VCM)

5. Water

A detailed Assessment report on both Groundwater and Surface water should be prepared including:

- i) assessment of the impacts of the project on both quantity and quality of the regions water resources.
- ii) Further assessment on the cumulative impacts resulting from the proposed project and other mining activities in the area (e.g., BCM, TCM, VCM).
- iii) Impacts of the development (including flooding and flood modelling) on surrounding watercourses, groundwater resources and surface water movements should be assessed, and measures proposed to monitor, reduce and mitigate these impacts.
- iv) Detailed information on site water balance for the project as well as the water supply requirements for the life of the project
- v) Provision of detailed information on the proposed pump and pipeline system to integrate water management across MCCM, TCM and VCM.

6. Traffic and Transport

Construction of the project will generate additional light and heavy vehicle movements on the local road network and should be further investigated as part of the requisite Traffic Impact Assessment report. Potential impact of the proposal on Council's Road assets should be clearly detailed.

7. Hazards and Risks

- i) A preliminary hazard analysis should be prepared as part of the EIS.
- ii) An assessment of Bushfire risk should be undertaken, and a corresponding Bushfire Management Plan developed.

8. Social Impact Assessment

A social impact assessment report should be prepared in accordance with the Department's current Best Practice Guidelines and be incorporated in the EIS including, and not be limited to, the following matters:

- i) Consideration of the impacts of the project, and cumulative impacts of other mining operations in the area, on community facilities, infrastructure and services.
- ii) Assessment of the social impacts of the project, and cumulative impacts of other mining operations in the area, relating to housing and accommodation, employment, training, community wellbeing and engagement.
- iii) a proposed plan for accommodation of any potential construction workforce. During construction the project may require temporary accommodation for the non-resident workforce, both in and around Narrabri. In this regard, Council strongly advocates for the use of the existing Civeo accommodation camps (Narrabri and Boggabri) for temporary workers accommodation.
- iv) Provide a clear and legible framework to suitably align to a future social impact management plan (SIMP).

9. Cumulative Impacts

An assessment of the cumulative impacts of the proposal with consideration given to the interaction of the proposal with ongoing and future mining operations in proximity to the subject site.

Land use conflict considerations should also be clearly assessed in accordance with current and draft LUCRA Guidelines.

10. Planning Agreement (PA)

Early discussions by the proponent in relation to the composition and extent of a corresponding PA with Narrabri Shire Council is encouraged. It should be noted that any proposed future PA should be separate to any payments required for the upgrade of local roads or construction of new roads associated with the project. In accordance with standard practice, any upgrades and/or improvements to the local road network required for the project are to be undertaken by the proponent at its own expense prior to the commencement of construction and in accordance with future conditions of consent.

Council trusts that the above advice provides the necessary assistance and thanks you for the opportunity to provide input. Should you have any further questions or require any further clarification on the contents of Council's correspondence, please contact Ms Michelle Henry, Council's Manager Planning and Development on (02) 6799 6866 or via council@narrabri.nsw.gov.au.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Ausling', with a stylized flourish at the end.

Donna Ausling
Director Planning and Sustainability