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Submission of Objection

Moolarben OC3 Extension Project: SSD-33083358

Hunter Environment Lobby Inc. is a regional community-based environmental organization that has been active for over 30 years on the issues of environmental degradation, species and habitat loss, and climate change.

We strongly object to the proposed extension of Moolarben Coal Mine Open Cut three operations (the proposal) for the following reasons:

1. Cumulative increase in Greenhouse Gas Emissions

Moolarben Coal Mine already has approval to produce 22 mtpa of thermal coal until 2038. This is a substantial volume of increased carbon release to an overheating atmosphere. It is unreasonable to approve an additional 86.59 Mt CO₂-e through an increase in extraction of 40 Mt thermal coal. The argument that demand will be covered by lower quality coal does not stand up to scrutiny under global agreements to decrease carbon emissions.

It is of note that the total annual NSW Greenhouse Gas emissions from our entire economy are projected to be 78.9–87.6 Mt CO₂-e in 2030.

The proposal will add additional lifetime Scope 1 emissions of 600,000 t CO₂-e and Scope 2 emissions of 190,000 t CO₂-e to the NSW Greenhouse Gas inventory between 2025 and 2034.

There appears to be no attempt to improve Scope 1 and Scope 2 emissions associated with current mining operations. Annual reporting demonstrates that cumulative Scope 1 and 2 emissions have increased year-on-year for the last 4 years in a row and emissions intensity per tonne of ROM coal mined has increased year-on-year for the last 3 years in a row.

This proposal cannot be approved by any responsible decision-makers.

2. Cumulative loss of critically endangered ecological communities (CEEC)

Previous approvals across the very large 80 km² Moolarben Mining Complex have resulted in a significant loss of old growth remnant Box-Gum Woodland, listed as critically endangered under the Federal *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The total area of removed CEEC from the mine site has not been reported in the biodiversity assessment for the proposal.

The proposed loss of a further 477.75 ha of CEEC is significant and cannot be adequately offset. We note that there are no specific offset arrangements identified in the assessment documents.

The CEEC provides habitat for a large number of threatened fauna and flora species, as does the additional 146.43 ha of bushland to be removed through the proposal.

3. Cumulative loss of threatened species habitat

There has already been a significant loss of high quality threatened species habitat on the Moolarben Mining Complex through past approvals. The area of current biodiversity offsets has not met reportable improvements in habitat replacement or an increase in threatened species records.

The proposal assessment has identified further loss of habitat for 22 threatened fauna species as well as a number of threatened flora species. These include:

- Masked Owl (*Tyto novaehollandiae*)
- Little Eagle (*Hieraaetus morphnoides*)
- Powerful Owl (*Ninox strenua*)
- Large Bent-winged Bat (*Hieraaetus morphnoides*)
- Pink-tailed Legless Lizard (*Aprasia parapulchella*)
- Broad-headed Snake (*Hoplocephalus bungaroides*)
- Regent Honeyeater (*Anthochaera phrygia*)
- Large-eared Pied Bat (*Chalinolobus dwyeri*)
- Eastern Cave Bat (*Vespadelus troughtoni*)
- Squirrel Glider (*Petaurus norfolcensis*)
- Koala (*Phascolarctos cinereus*)
- Large-leafed Monotaxis (*Monotaxis macrophylla*)
- Cotoneaster Pomaderris (*Pomaderris cotoneaster*)

4. No identified offsets

The proposal has been assessed to require 15,624 ecosystem credits to offset loss of ecosystem biodiversity and 56,501 species credits to offset significant impacts on seven of the above listed threatened species.

No offset strategy has been identified or assessed for outcomes under the proposal. It is entirely unacceptable for this scale of biodiversity impact to be considered after a decision is made.

We maintain that the cumulative loss of threatened species habitat and CEEC across the three large adjacent mining operations is unsustainable and further loss cannot be approved. The scale of cumulative loss has not been quantified.

5. Water source impacts

Moolarben Mine Complex is on the headwaters of the Goulburn River, the major western rising tributary of the Hunter River. The cumulative loss of base flows to the river system and increasing drawdown of groundwater sources across the three major coal mine operations is a critical intergenerational issue that must be considered and properly assessed.

The proposal is predicted to cause a further loss to base flows of 180 – 225 ML/year and 600 ML in wet years. This is a significant additional permanent loss of critical freshwater flow to the Goulburn River system. The cumulative loss of base flow since coal mining commenced in the mid 1980s has not been documented or included in the assessment of the proposal.

Hunter Environment Lobby has little faith in the quality of the water models used to predict impacts from the Moolarben Mining Complex. The models have systematically underestimated water interception at each assessment for increased mining activity and do not adequately considered climate extremes. This has been demonstrated with the recent exemption to the Moolarben water discharge licence.

The Environment Protection Authority has granted an exemption to current approval conditions for water discharge by allowing 65 ML/d of untreated mine water and 20 ML/d of treated mine water to be released into the Goulburn River and Wilpinjong Creek between 15 November and 31 December 2022.

The mine water balance and poor water storage capability is based on the faulty modelling predictions that has caused the need for the release of untreated mine water into the environment. This occurred at a time when high river flows were causing impacts to downstream community members limiting in-property and public road access.

The proposal cannot be approved based on poor model validation and past poor predictions.

Conclusion

At a time when carbon emissions must be dramatically reduced and species extinction rates in Australia are increasing, it is irresponsible for key decision-makers in NSW to approve this proposal. It does not meet the principles of ecologically sustainable development, especially the principle of inter-generational equity.

Yours sincerely



Jan Davis
President