



environmentally concerned citizens of orange

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**Major Projects
NSW Government
December 13, 2022**

Re: The Moolarben Coalmine Extension to Open Cut 3.

To whom it may concern,

I am writing this submission on behalf of the Environmentally Concerned Citizens of Orange (ECCO). Since commencement in 2006, our organisation has been involved with many of the environmental issues exacerbated by the coal mining industry. It is therefore of great concern to us that the above mining operation is seeking to expand further into the upper Moolarben Valley, further threatening an area rich in biodiversity. We are concerned about the effect such an expansion will have on the already compromised water systems of the Goulbourn River. ECCO also questions the wisdom and morality of extending a source of fossil fuel pollution and carbon emissions in times of climate crisis.

The proposed extension is expected to come within one hundred metres of the Munghorn Gap Nature Reserve. The reserve is an area of high conservation value, as it provides habitat for a variety of native birds and animals, including the highly endangered Regent Honeyeater, Squirrel Glider, Koala, and Large Eared Pied Bat.

Another major threat to the biodiversity of the area is the proposed clearing of 624.18 ha of irreplaceable native vegetation necessary for the establishment of the extension, including 477.75 ha of Box Gum Woodland Critically Endangered Ecological Communities, of which only five percent remains.

As well as the loss and disruption to endemic species caused by habitat loss, there is also the 24-hour disturbance caused by light pollution and noise from the mine operations.

The Federal Government has indicated through its Minister for Environment and Water that tough new environmental laws will be introduced to increase the protection of endangered species and their habitats. This has been done in response to the Samuel report, which is damning in its assessment of the condition of Australia's environment. To sanction the removal of such an area of acknowledged rare and essential wildlife habitat would be in direct opposition to the necessary legislation planned to protect our wildlife and the habitat upon which it depends.

As mentioned above, the extension of the mine would further compromise precious water sources in the area. Further incursion into the springs, water courses and aquifers in the upper Moolarben valley will result in the permanent loss of good quality low salinity water from springs that provide fresh flows to creeks, as well as the Goulburn River. This important

tributary of the Hunter River has already been compromised by mining. A further extension to local mining operations will result in an estimated loss of between 180- 225 million litres per year, and 600 litres in wet years. This will impact on river health and downstream water users, including the Goulburn River National Park.

The output from the proposed extension will be an additional 40 million tonnes of coal. This will produce an estimated extra greenhouse emission of 86.59 Mega tonnes of carbon dioxide. To sanction an enterprise which has the potential to increase carbon emission in a time that is universally acknowledged as a climate crisis is unconscionable. It also flies in the face of our Paris commitments to reduce our carbon emissions. The fact that Australia has pledged to reduce our carbon emissions by 43% makes it impossible to contemplate an increase of a source of carbon pollution of this magnitude.

In conclusion ECCO respectfully asks that the Moolarben Coalmine Extension to Open Cut 3 not be given permission to proceed. To do otherwise would be an affront to our commitment to protect and conserve our natural biodiversity and water, and our commitment to action on climate change. Issues such as species extinction, habitat loss and increased carbon emissions are challenges that require action. Appropriate action does not include sanctioning a proposal that would directly compromise efforts to confront these challenges.

Yours sincerely
Neil Jones
President, ECCO.