

Moolarben OC3 Extension Project SSD-33083358 EXH-50540708

EIS exhibition period 17 November - 14 December 2022

Thank you for the opportunity to object to this latest in the series of Moolarben Coal Complex (MCC) extension proposals, the 40 million tonnes of coal proposed to be exposed and burned is the equivalent of a whole new coal development and real-world effects have been deceptively minimised by not treating this “expansion” as a new project.

This reckless proposal ignores the true scale of cumulative consequences for the totality of major development in this area and this proposal in particular is set to destroy the last remaining part of the Moolarben Valley. At the very least this last natural area should be preserved and upgraded as partial offset for the broad scale coal mining that has already occurred across the headwaters of the Goulburn River, severely damaging the natural systems (especially water and biodiversity) for centuries or in human terms may as well be gone forever.

I have witnessed planning decisions handed out since the 1980s by coal companies and their Government allies exact a heavy price on the water resources, biodiversity and community in the Ulan/Wollar/Goulburn River area and I can see in this EIS no change to the pattern of reliance on flawed modelling despite repeated historical failure, careful use of terms (weasel words) such as “indiscernible”, “negligible”, “where reasonable and feasible” and “extreme” events being outside the proponent’s responsibility, not to mention the weighty mass of documents needing to be evaluated in a limited timeframe.

The proposed destruction of 624.18 hectares of intact native vegetation including 477.75 ha of Box-Gum and Slaty Gum Woodland (critically endangered CEEC) impacts on 22 threatened fauna species including an emerging population of Koalas, the Large-eared Pied Bat and Eastern Cave Bat and a myriad of woodland birds is completely unacceptable by any modern standard- there is no social licence for this kind of destruction. The “200 metres buffer zone” around Moolarben Creek will be overlaid by haulage roads and infrastructure such as mine dams and overburden dumps. This is not a buffer zone. A buffer zone should be managed as a conservation corridor and should be made bigger to provide wildlife and vegetation linkages across the valley and with the nearby Munghorn Nature Reserve. Whatever ecosystem credits system employed to justify (greenwash) this proposal, these precious flora and fauna will still be erased from this area and denied to future generations.

The EIS has sought to minimise predicted impacts of the project on water resources. For example, claiming that their modelling indicates “less than a 1% annual probability of uncontrolled spills of mine-affected water from the project” and reassuring us that overflows of dirty mine water into the river would only occur during extreme rainfall events with no measureable downstream impacts. Emergency discharge licenses have had to be granted three times since 2010, this regular failure of mine water modelling to control on-site water contaminated by mining operations predates the proposed expansion and is already having a deleterious effect on river flow and quality. The reason why downstream impacts of uncontrolled spills are being defined or predicted as not measurable in this EIS is that the

mines have and will be exempted from approved monitoring requirements and water quality conditions whenever they can claim an emergency. At time of writing, on one measure alone the latest ongoing releases of untreated mine water into the Goulburn/Hunter system have trebled downstream salinity and will dump several thousands of tonnes of extra salt into the Upper Goulburn, no one is reporting for heavy metals or effects on groundwater or river ecosystems for example. 'Extreme' rainfall events are a part of the Australian environment which we ignore at our peril and have proven to occur for MCC every few years. Climate change is now well under way and this means that we can expect 'extreme' weather events to occur more often with differing extremes happening consecutively as well.

Similarly the role and value of freshwater springs coming from the foot of the Munghorn on the Southern edges of the proposed expansion area is not being assessed because it is not being measured in the first place. There has been no survey of creek alluvium or freshwater springs and there appears to be very limited groundwater monitoring sites located in the new project area, mainly monitoring has been to the north and middle areas. Before any approval evidence should be presented explaining where all these springs are and how these fresh groundwater flows will avoid being captured within the broken rock filled area created by this proposed project and thus an important source affecting downstream water quality be contaminated and degraded for many years.

MCC EIS fails to account for the cumulative impact from already approved mining that will over time for all downstream seriously degrade water quality and quantity of flow into the Goulburn River National Park as well as the whole Hunter River system. This project will contribute Scope 1 emissions of 600,000 t CO₂-e and scope 2 GHGs of 190,000 t CO₂-e to the NSW inventory 2025-2034. There is no evidence that condition 20(b) Stage One Development Consent requiring that MCO "implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site" is being followed. Cumulative Scope 1 and 2 emissions have increased at the existing Moolarben mine over the last four years and emission intensity per tonne of ROM coal mined has increased for the last three years.

If the decision is to proceed regardless of the above risks, the only just or reasonable mitigation to balance impacts in the Ulan/Wollar/Goulburn River area is for MCC to relinquish and withdraw from mining further to the North. The approved underground 4 LWs panels 9-14 pose a great threat to public safety, viability and ecology of the Goulburn River Gorges including the Drip Gorge and the Corner Gorge. UG4 LW panels 9-14 should not be mined and the Exploration License 6288 should be relinquished.

Yours sincerely

Colin Imrie