



Nature Conservation Council

The voice for nature in NSW

14 December 2022

Genevieve Lucas
Contact Planner
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Ms Lucas

Objection: Moolarben OC3 Extension Project (SSD-33083358)

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 160 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC objects to the proposed extension of Moolarben Open Cut 3 (the Project) because of the cumulative impacts on greenhouse gas emissions, biodiversity and on regional water sources. There is no economic justification for this project because the costs of increased extreme weather events caused by more carbon release will offset any perceived benefits. The recent extreme flood events in NSW are the costliest on record.¹

Greenhouse gas emissions (GHG)

We note that the Project will cause the release of an additional 86.59 Mt CO₂-e in total. This is of interest when the total annual NSW GHG emissions from our entire economy are projected to be 78.9–87.6 Mt CO₂-e in 2030.

The Project would add lifetime Scope 1 GHG emissions of 600,000 t CO₂-e and Scope 2 GHG emissions of 190,000 t CO₂-e to the NSW GHG inventory between 2025 and 2034.

We also note that cumulative Scope 1 and 2 emissions have increased at the existing Moolarben Mine operations - year on year - for the last 4 years in a row and that emissions intensity per tonne of ROM coal mined has increased - year on year - for the last 3 years in a row.

Diesel emissions are the main Scope 1 GHG at the existing mine. There is no evidence that the mine owners are doing anything significant at all to reduce diesel emissions. There is also no evidence that Scope 2 emissions from the generation of purchased electricity will be abated.

¹ <https://www.theguardian.com/australia-news/2022/nov/23/nsw-floods-now-australias-most-expensive-natural-disaster-as-insurance-claims-skyrocket>



This is contradictory to the fact that the Moolarben Mine falls within the boundary of the Central West Orana Renewable Energy Zone.

It is highly inappropriate for the NSW Government to approve the expansion of coal extraction in an area dedicated to increasing the production of renewable energy to meet the State carbon reduction targets.

The Project should not be approved on the basis of additional GHG emissions.

Biodiversity Impacts

The Project will remove 624.18 ha of native bushland including loss of critically endangered ecological communities (CEEC) listed for protection under Federal environmental law:

- Box-Gum Woodland - 477.75 ha
- Eucalypt Forest and Woodland – 15.37 ha

The biodiversity assessment has concluded that 15,624 ecosystem credits must be obtained to offset this level of impact.

The loss of this habitat will have significant impact on a large number of threatened native animal and plant species. These include:

Pink-tailed Legless Lizard (*Aprasia parapulchella*)

Broad-headed Snake (*Hoplocephalus bungaroides*) - Dual credit species (breeding habitat)

Regent Honeyeater (*Anthochaera phrygia*) (Critically Endangered)

Large-eared Pied Bat (*Chalinolobus dwyeri*)

Eastern Cave Bat (*Vespadelus troughtoni*)

Squirrel Glider (*Petaurus norfolcensis*)

Koala (*Phascolarctos cinereus*) (Endangered)

Cotoneaster Pomaderris (*Pomaderris cotoneaster*)

Commersonia procumbens

Large-leafed Monotaxis (*Monotaxis macrophylla*)

The biodiversity assessment has concluded that 56,501 species credits must be obtained to offset this level of impact.



It is of great concern that the Project proponent has not committed to any Biodiversity Offset Strategy but reserves the right to discharge offset obligations upon Project approval.² This is highly unsatisfactory in the context of the extent of the significant impacts on species threatened with extinction in NSW.

Munghorn Gap Nature Reserve, the second oldest nature reserve in NSW, is entirely surrounded by open cut mining operations on the northern and some western edges. Further impact from the Project with planned open cuts operations as close as 50m from the reserve boundary and other mining works within 1m of the boundary is unacceptable. The cumulative impact of noise, dust and light pollution on the important habitat within the reserve is not monitored or reported.

All current large mining operations in the area have suggested that Munghorn Gap Nature Reserve and Goulburn River National Park provide habitat for displaced native species impacted by mine clearing and disturbance. However, there has been no assessment of the increased competition for food and breeding sites or of the cumulative impact of noise, dust and light pollution from existing mine approvals.

The Project should not be approved on the basis of cumulative biodiversity impacts.

Water Source Impacts

The Moolarben Valley forms the headwaters of the Goulburn River, a large Hunter tributary. Many freshwater springs in the valley that supply baseflows to creeks and drought refugia have already been impacted by current mining operations. The remaining springs are essential to environmental health of the landscape but have not been adequately mapped.

The predicted loss of flows caused by the additional mining impacts of the Project are highly likely to be underestimated, as have all other water impact predictions made in past Moolarben expansion assessments.

The recent need for the Environment Protection Authority to grant an exemption to the approved Moolarben water discharge licence is an indication that water interception on the mine site has been under predicted. The discharge of 65 ML/day of untreated mine water into surface water sources adjacent to the mine, with no requirement for reporting on water quality until after 31 December 2022, is not good water management.

² EIS Appendix C p 198



Nature Conservation Council

The voice for nature in NSW

The management of water impacts on the Moolarben Mine site has been highly inadequate based on poor modelling and assessment processes. The predicted increase in extreme weather events through climate change will increase the problems with onsite water management and ongoing decline in the health of the Goulburn River and its impacted tributaries.

The Project should not be approved on the basis of cumulative water source impacts.

Thank you for the opportunity to participate in the consultation.

For further discussion on this matter, please do not hesitate to contact Policy and Advocacy Director Dr Brad Smith, bsmith@nature.org.au or (02) 9516 1488.