

Submission of Objection to Moolarben OC3 Extension Project SSD-33083358

Mudgee District Environment Group objects to this project. To extend OC3 and create four new open cut pits for coal extraction would cause irreparable further damage to our climate, biodiversity, water, cultural heritage and agriculture.

The proponent downplays impacts from the proposal and the resulting cumulative impacts claiming that the Extension Project is in a mining vicinity, would occur on cleared land and be conducted within existing approved timeframes. This ignores the significance of the land and its inherent qualities, and the cumulative impact of emissions.

Genuine consultation is gravely lacking. Twenty attendees at a community information session is not sufficient to base conclusions. It is disingenuous to suggest that the website and complaints phone line are avenues of community consultation.

The following objections are provided for your consideration.

Climate Change

This proposal should be rejected on the basis of its Climate Change impacts alone. Australia is committed to reducing green house gas emissions by 43% by 2030. If global emissions were to be reduced by 43% by 2030 there is a chance global warming could be limited to 1.5% (IPCC *Emissions Gap Report 2022 : Closing the Window*).

However, common sense would say a 43% reduction by 2030 is inadequate, for the following reasons:

- Australia has already experienced 1% of warming and the growing intensity of natural disasters (the 2019-20 Bushfires and the 2022 Floods) demonstrates that 1 degree of warming is highly dangerous
- 1 degree of warming has been enough to produce sea level rises that, if allowed to continue, will devastate Pacific islands, coastal communities globally, entire nations such as Bangladesh and the great river deltas that provide a good deal of the world's food
- Many of the world's poorer countries do not have the resources to pursue rapid transformation of their economies to renewable energy sources so richer countries such as Australia must achieve more than a 43% reduction

Australia needs to strive to reduce emissions by much more than 43% by 2030.

Most of the action needed to reduce green house gas emissions will need to be taken by State governments. The Commonwealth government controls 2 areas of government policy that can be applied to reduce emissions – taxation policy and population policy. On the other hand State governments control mining, agriculture, forestry and land use, energy generation and distribution, and transportation.

Australia will not reduce its emissions by 43% or by the higher reduction really needed, unless State governments pursue reductions in everything they do.

If reductions in emissions are needed, it is completely illogical to contemplate approving coal mine extensions or new coal mines.

The proposed extension to Moolarben Open Cut 3, if allowed to proceed, would increase greenhouse gas emissions by 86.59 Mt CO₂ -e.

Currently, the Moolarben mine is projected to remain in operation until 2038. The State government needs to be focusing on developing plans to substantially reduce the life of this and all other coal mines in NSW. That is the urgent task at hand, not contemplating approving more coal extraction.

Habitat loss

Habitat loss is a Key Threatening Process. The cumulative loss of habitat for listed species within the project area is significant and cannot be adequately offset. Mudgee-Wollar is an Important Bird Area and habitat loss should not be permitted. The negative indirect impacts such as noise, lighting, dust and loss of connectivity must also be given the highest priority in assessment of impacts.

Listed threatened fauna species cannot maintain or increase their populations in the face of their habitat being destroyed. It is incongruous that the government is aware of declining fauna populations and considers reducing their habitat further.

The proposal is located in the last remaining valley in the vicinity that is not already subject to mine activities, and it is adjacent to Munghorn Gap Nature Reserve. The land in question thus provides highly valuable contiguous habitat and potential corridor movement for the fauna of the Nature Reserve. If this proposal is approved the conservation values of Munghorn Gap will be threatened, and bird and koala habitat reduced. This cannot be permitted.

Vegetation

If this proposal is approved 477.75ha of the Critically Endangered Ecological Community of Box-Gum Woodland would be lost forever. This is irreplaceable.

Clearing Critically Endangered Ecological Communities should not be permitted. There is no adequate replacement or offset available. The consequence is a net loss of that vegetation community.

Biodiversity

The EIS states (Appendix C p8/896) 'Six entities at risk of SAIL (serious and irreversible impacts) were relevant to this assessment: Box-Gum Woodland CEEC, Broad-headed Snake, Large-eared Pied Bat, Eastern Cave Bat, Swift Parrot and the Regent Honeyeater.' By definition no amount of offsetting and management will change these impacts. There will be a net loss of biodiversity if this project is approved.

Water

There are significant springs within the valley where the proponent intends to operate an Open Cut Mine. The springs are at the head of the valley and adjacent to the nearby escarpment. The springs are a vital element of the landscape and provide permanent water: they are an important drought refuge for all native species (threatened or not), as well as supporting groundwater for groundwater dependent ecosystems.

The loss of these springs has not been adequately addressed. The assessment of impacts on water resources is therefore incomplete. The springs are a critical part of the groundwater system. The impacts will include reduction of base flows to the creeks and the Goulburn River and drawdown of connected alluvial aquifers.

The loss of baseflows of 180-225 million litres/year and 600 million litres in wet years in the Goulburn River will impact negatively on river health and all downstream users. The Goulburn River National Park, all flora and fauna, and human use of the river will be compromised.

The 200m buffer zone to Moolarben and Murdering Creeks will not protect these waterways from the mining operations. Infrastructure including haul roads will have a deleterious effect on the important riparian vegetation. The vegetation here is significant for many animals and the integrity of the whole riparian zone.

Water issues have not been adequately addressed and the project should not be approved.

First nations

There has already been loss of cultural heritage values in the landscape due to large-scale mining activities. The cumulative effect of this needs to be acknowledged and any further loss prevented. This area is significant as it is associated with the Goulburn River trade routes and a known corroboree site at Cooks Gap. The Traditional Pathways of the Aboriginal people are intrinsically tied to the landscape. Changes to the visual landscape impact negatively on their connection to the land.

Shelters with artefacts (one with possible burial) and axe grinding grooves are listed within the 130 cultural heritage sites identified. We are diminished by removal of these sites if the land is cleared and mined.

The project should not be approved.

Four new open cut mines, water management infrastructure, haul roads and development of stockpiles and borrow pits, will create unacceptable loss of vegetation and associated animal communities, first nations heritage, major landform changes and natural water flow impingement, and contribute to the Global Climate Emergency.

MDEG members believe there is no valid justification for the project to proceed.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "R. Hadaway". The signature is written in black ink on a white background.

Rosemary Hadaway

Chair

Mudgee District Environment Group