

I am gravely concerned that the proposed extension of the Bloomfield coalmining operation until 2035 (MOD 5) fails to adequately **consider the consequences**. This application should be rejected if there is any respect for the law of New South Wales.

The Biodiversity Conservation Act gazettes the flora, fauna and ecological communities of this state that are currently threatened with extinction due to the land management over the past two hundred years. This Act lists species that, if threatening processes continue unabated, are vulnerable to extinction, endangered and critically endangered. The law is intended to conserve our biodiversity. All endeavour to prevent extinction of species is intended. The approval of this proposal would be reinforcing the threat to many flora and fauna species but it would be a **direct significant impact** for the Regent Honeyeater.

The impact on the Regent Honeyeater through the proposed clearing of over 50 hectares of the Endangered Ecological Community, Lower Hunter Spotted Gum-Ironbark Forest, (LHSGIF) about 80% of which is in the highest habitat value condition class was **not adequately assessed**. The Regent Honeyeater species is listed as Critically Endangered. It is estimated that there may be only 300 individuals remaining in the wild. There is a Recovery Team working on preventing the extinction of this species.

<https://www.abc.net.au/news/2023-07-01/conservationists-sight-critically-endangered-regent-honeyeaters/102529996>

But the impact of the proposal on this species was not adequately assessed. No targeted searches for Regent Honeyeaters were made when they are likely to have been breeding (i.e. when local ironbarks [*E. siderophloia* and *E. fibrosa*] have been flowering). Aside from being an important breeding region, the Lower Hunter is almost unique because it also offers ample winter-feeding resources in the form of Spotted Gums. (Mick Roderick, Birdlife Australia).

The **danger of extinction** of the Regent Honeyeater species because the population is so low, it has an extremely restricted geographic range and their necessary habitat for successful breeding and winter feeding is continuing to be cleared means that this Bloomfield site is very important. It simply should not be cleared if we do not want to contribute to the extinction of a species! All LHSGIF needs to be protected.

The high conservation value of the Four Mile Creek Bloomfield site area is recognised in the Hunter Regional Plan 2041. The consequences of this proposed mine extension for habitat connectivity for many species has not been accorded due respect.

The Biodiversity Development Assessment Report (page 60) for the proposal provides the general approach that needs to be taken under the BC Act but it does not acknowledge the basis of the legislation and the recognition of the need to take the steps to conserve biodiversity.

***Avoidance** – *Avoid direct and indirect risk of adverse impacts to Threatened species and their habitats where feasible.*

- *Minimise – Minimise the risk of adverse impacts to Threatened species and their habitats where they cannot be avoided.*
- *Mitigate – Implement mitigation and displacement measures to manage the risk of adverse direct, indirect and cumulative impacts to Threatened species and their habitats.*
- *Rehabilitation – Areas no longer required for operations will be rehabilitated.*
- *Provide Offsets – Where required, offsets will be provided in accordance with the Biodiversity Offset Scheme (BOS) under the Biodiversity Conservation Act 2016 (NSW) (BC Act).*

The proposal should be rejected because it has not even considered the possibility of “avoidance”.

This SSD MOD 5 does not consider any alternative! (BDAR page 60 Stage Two Impact Assessment).

2.1.2 Alternatives considered

There are no alternatives considered. *The Project location was determined by the location of coal resources and proximity to existing mine workings.*

This proposed extension of mining is a lose, lose, lose proposal. It clearly is long past the time when access to coal resource and the presumed political value of preserving coalmining jobs are considered the most important decision-making criteria.

The need to curtail greenhouse gases emissions is imperative to limit global heating. This must be the primary decision-making criterion. Every opportunity to leave fossil fuels in the ground must be taken.

The impact of climate change from global heating must be considered at all stages of an Impact Assessment. Wherever the coal is burnt it is adding to the carbon dioxide levels in the atmosphere and contributing to the greenhouse effect.

The shift in weather patterns and unpredictability of conditions from climate change affects all aspects of life and society. It is not in the public interest to approve a coalmine extension.

[A snapshot on our unpredictability of the weather in our warming world is here](#)

The change in the climate is confronting. It is clear that the biodiversity crisis and threat of extinction of species needs to be considered in this time of transition. All decision-making must take in to account the impact of continued burning of fossil fuels for energy production on greenhouse gas levels and consequent global heating.

I commend the work done by the Barrington to Hawkesbury Climate Corridors Alliance ([Barrington to Hawkesbury Climate Corridors](#)) that has compiled the comprehensive and extensive information that identifies the strategic protection of remnant vegetation connecting regional climate change refugia for native species persistence in a warming world.

The Bloomfield Mine has continued for too long already. The proposal for modification of its approval to mine coal to continue even further in to our uncertain future of more extreme weather events, more often and more unpredictable needs to be rejected. It should not continue to contribute to increasing greenhouse gas levels and global heating.