



Nature Conservation Council

The voice for nature in NSW

Friday 11th July 2025

Submission on Boggabri Coal Mine MOD 10 - Increase to mine footprint and mine life

To whom it may concern,

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC is concerned about the impacts of the Boggabri Modification 10 and object to the modification due to its impacts on threatened flora and fauna, water resources as well as climate change impacts.

Concerns Regarding the Use of the Modification Pathway

Modification 10 raises serious questions about the appropriate use of the modification process. The proposal seeks to extend the mine's life by four years and increase coal extraction by an additional 30 million tonnes, effectively reinstating the broader scope of the original Mod 8 proposal, which was scaled back following departmental review.

Taken together, Modifications 8 and 10 represent a significant expansion of the project that, in substance, aligns more closely with a new development rather than a modification. Progressing this application through the modification pathway limits the opportunity for full public consultation, detailed cumulative impact assessment, and independent review. Given the scale and long-term implications of the proposed changes, this proposal would be more appropriately assessed through a new development application to ensure transparency, consistency, and robust environmental oversight.

Irreversible Biodiversity Impacts

The clearing of 85 hectares of native vegetation would destroy habitat critical to the survival of at least 15 threatened fauna species and two threatened flora species, including the **critically endangered Regent Honeyeater and Swift Parrot**, and the



Nature Conservation Council of NSW

GPO Box 2246 SYDNEY NSW 2001

www.nature.org.au

ABN 96 716 360 601

vulnerable Corben's Long-eared Bat. These impacts are cumulative, following extensive clearing already undertaken by three adjacent mines in the Leard State Forest region. Continued habitat fragmentation risks long-term species decline.

Of particular concern is the Swift Parrot, given the species' critically endangered status and its repeated recorded presence in the State Forest in 2012, 2014, 2022, and 2023. The Leard State Forest represents a significant foraging habitat for the Swift Parrot.

Threats to Wildlife Corridors

Although Mod 10 does not propose to mine directly through the 3.5-kilometre-long, 500-metre-wide wildlife corridor that facilitates critical east–west fauna movement between the Maules Creek and Boggabri open-cut coal mines, the proposed operations would extend blasting and excavation activities up to its boundary. Flanked by two large-scale mining operations, the corridor will be subjected to increased exposure to invasive species, predators, elevated noise levels, blasting vibrations, and dust emissions. As a result, Modification 10 is likely to render this habitat corridor functionally ineffective for all but the most mobile and disturbance-tolerant species, significantly compromising ecological connectivity within the Leard State Forest.

Groundwater and Surface Water Risks

Modification 10 of the Boggabri Coal Mine threatens regional hydrology by intercepting surface flows, accumulating in-pit water, and drawing down groundwater, without adequate water entitlements. This raises serious compliance and resource management concerns.

The proposal disregards other water users, groundwater-dependent ecosystems, and the sustainability of downstream Murray–Darling Basin communities. Cumulative water interception from Boggabri, Tarrawonga, and Maules Creek mines is already stressing aquifers, especially in the Nagero Creek alluvium linked to the Upper Namoi Zone 4 aquifer. The mine footprint nearly matches the catchment, risking severed recharge paths and irreversible damage to the Bluevale Unregulated Water Source. A projected 5.1m drawdown breaches NSW's Aquifer Interference Policy.

Boggabri lacks sufficient water licences to meet Mod 10's needs. Existing licences (WAL2571, WAL2595) allow just 81.7 ML/year, falling about 690 ML short annually—particularly for dust suppression. WAL2571 is irrigation-only, not mining, and additional licences are conditional on Ministerial approval.

Water take from Namoi's Zone 11 (Maules Creek source) also exceeds entitlements. Licences there are scarce, making acquisition unlikely without harming agriculture. NSW regulations require projects to hold matching water entitlements—Mod 10 does not.

Due to cumulative impacts, Aquifer Interference policy breach, licensing shortfalls, and risks to ecological and agricultural resilience in a water-stressed region,



Modification 10 should be rejected. The Department must apply Cumulative Impact Assessment Guidelines and enforce policies to protect critical water resources.

Incompatibility with Climate Goals

Boggabri Modification 10 is fundamentally inconsistent with NSW's legislated climate commitments under the *Climate Change (Net Zero Future) Act 2023*.

NSW DPHI approved Boggabri Mod 8 on 22 January 2024, accepting increased Scope 1 GHG emissions as aligned with NSW's 2030 and 2035 targets. However, updated NSW DCCEEW modelling from 18 April 2024 shows Mod 8 adds about 70,000 t CO₂-e to a projected 7.8 Mt CO₂-e 2035 overshoot, revealing the project no longer fits the State's climate commitments.

If Mod 10 proceeds, emissions from Boggabri would triple their contribution to that overshoot of the 2035 target, from 70,000 to approximately 210,000 tonnes CO₂-e. Rather than demonstrating a downward emissions trajectory, Boggabri's Scope 1 emissions reached their highest level in FY24 since the introduction of the Safeguard Mechanism, with projections showing further increases through to 2040.

The proponent's own modelling in their 17 May 2024 Scoping Report does not anticipate any Scope 1 reductions at all between now and 2040. The project proposes to continue operations with current equipment and processes, extending elevated emissions for at least four additional years. This flatly contradicts the NSW EPA's Guide for Large Emitters and undermines the state's net zero trajectory.

Given this clear misalignment with state climate policy and statutory targets, Mod 10 should not be granted approval.

Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW is Coal Mining and Methane Campaigner, Manjot Kaur.

Yours sincerely,



Jacqui Mumford
CEO of Nature Conversation Council NSW

