

# Submission to the Maules Creek Coal Project

11/10/2011

Dear NSW Planning Department and the Planning Assessment Commission,

I, Naomi Hogan, call on the NSW Government to **reject the Maules Creek Coal Mine**. The proposed action for an open cut coal mine of this scale in Leard State Forest, a known biodiversity hotspot, directly **contravenes NSW Government responsibility** to:

1. Properly manage timber resources under the NSW *Forestry Act 1916*,
2. Protect threatened species and endangered ecological communities,
3. Avoid the worst impacts of climate change by limiting the NSW greenhouse gas contribution, and
4. Follow the principles of Ecologically Sustainable Development under the *Environmental Planning and Assessment Act 1979*.

Please see below evidence to demonstrate these four points.

## **Properly manage timber resources under the NSW Forestry Act 1916.**

Section 11(1)(a) of the *Forestry Act 1916* states that Forests NSW is to have control and management of state forests and shall control and manage them in such a manner as **best serves the public interest** and, in so doing, may **maintain and improve indigenous species of trees** and may on state forests establish, maintain and improve plantations of indigenous species and exotic species of trees. The Forestry Commission is to **preserve and improve, in accordance with good forestry practice, the soil resources and water catchment capabilities** of Crown-timber lands and land owned by the Commission or otherwise capabilities under its control or management.

Instead, the Maules Creek Coal Project will clear 1,665 hectares of Leard State Forest, destroying the state timber resource for the private profit of Ashton Resources. Water catchment capabilities will certainly be compromised, as the project includes the digging of 320m metre deep coal pits. This will significantly impact surface water flows, depressurise the water table across kilometers of surrounding forest and agricultural land and impact unique groundwater dependent ecosystems.

## **Protect threatened species and endangered ecological communities.**

Leard State Forest is of extremely high conservation value and should not be destroyed for open cut coal mining. It includes the **most extensive and intact stands of the**

**nationally-listed and critically endangered Box-Gum Woodland** remaining on the Australian continent. Significantly, 545 hectares of forest to be cleared for the Maules Creek Coal project is Box-Gum Woodland. When combined with the other two open cut coal mines planned for the Leard Forest area, the total clearing of endangered communities in Leard Forest comes to over 1,169 hectares.

Leard State Forest is home to 396 native species of plants and animals, and known or likely habitat for 36 threatened species and several endangered ecological communities. The proposed clearing of Leard State Forest for this open cut coal mine will impact negatively on the life-cycles of these rare and threatened native species. It will lead to a substantial reduction in foraging and roosting habitat, fragmentation, edge effects, increased threats from invasive species, disruption of breeding cycles and will ultimately cause a **long-term decrease in the size of the already limited populations**.

Significantly, Leard State Forest is within the Liverpool Plains province of the Brigalow Belt South bioregion, a nationally recognised biodiversity hotspot. Only 2.9% of the Brigalow Belt South bioregion within NSW is included in secure protected areas, well short of the 15% protection target that is considered necessary by both national and international standards.

**Avoid the worst impacts of climate change by limiting the NSW greenhouse gas contribution.**

At a time when governments across the world are in agreement about the need to bring down our carbon emissions and take action to avoid dangerous climate change, this massive coal mining project is unacceptable. This project will make an enormous contribution to global warming, amounting to at least **25 million tonnes of greenhouse gas emissions every year** from burning the product coal. This is equivalent to more than 15% of all emissions from NSW annually. This does not account for the lost carbon sequestration capacity of the forest.

**Follow the principles of Ecologically Sustainable Development under the *Environmental Planning and Assessment Act 1979*.**

ESD is a consideration under all NSW Planning decisions under the Planning Act. The principles of ESD include:

- The precautionary principle,
- Inter-generational equity,
- Conservation of biological diversity and ecological integrity, and
- Improved environmental valuation, pricing and incentive mechanisms.

The previously listed impacts of this project on climate change and the destruction of threatened species habitat and critically endangered ecological communities clearly go against the first three principles of ESD.

Regarding improved environmental valuation, in September 2011, Economists at Large Pty Ltd put together an Assessment of the habitat value of Leard State Forest (Attachment A). They demonstrate that environmental assets have value and that conserving Leard State Forest should not be seen as a cost, but rather as **protecting real and valuable assets that play a critical role underpinning market based economic activity**.

Their economic assessment of Leard State Forest used estimations from the Victorian BushBroker programme. They found that the habitat value of Leard State Forest could range from \$630,385,000 (the habitat value using average minimum price across bioregions) to \$1,506,145,667 (the habitat value using average maximum price across bioregions).

Their estimates only included the value of habitat and ecosystems of the Leard State Forest. They did not estimate of the total economic value (TEV) of the forest. A TEV would further include direct use values such as recreation, tourism and forestry, indirect use values or environmental service values such as impacts on ground and surface water volume and quality, carbon sequestration and impact on air quality, and non-use values relating to how the people of NSW value the existence of the forest and its flora and fauna.

In conclusion, **I strongly recommend the NSW Government reject the Maules Creek project** at this time. Ashton Resources needs to work much harder to come up with a project that is not so heavily destructive to Leard State Forest, to threatened species and ecosystems, to critical groundwater systems and to our fragile climate. The people of NSW deserve better outcomes from a government in charge of our public natural assets into the future.

Yours sincerely,

Naomi Hogan

Hunter resident of NSW