

Stephen O'Donoghue
Mining and Extractive Industries
Major Development Assessment
NSW Department of Planning
GPO Box 39
SYDNEY 2001

29th February 2012

Dear Steve,

Please accept this as a submission to the Project Approval assessment for the Tarrawonga Coal Mine expansion under Part 3A of the NSW Environmental Planning and Assessment Act from the Northern Inland Council for the Environment.

We are strongly opposed to the Tarrawonga Coal Mine expansion application and request that development approval for the project is refused.

We believe the impacts of the Tarrawonga Coal Mine expansion, in conjunction with other current and proposed mines and expansions in the vicinity, will have a significant and irreversible impact on biodiversity, and cannot be mitigated. We consider that the proposed offsets are markedly inadequate to ameliorate those impacts.

The outstanding national conservation significance of Leard State Forest is enough reason on its own to reject the Proposal outright.

Leard is located in a national biodiversity hotspot and it contains extremely diverse flora and fauna, high quality habitats for up to 36 threatened species, nationally endangered communities, overcleared landscapes and poorly reserved ecosystems.

It represents a large, intact refuge habitat with good spatial configuration in a heavily cleared region and it is crucial to vegetation connectivity and climate change adaptation on a landscape scale. It is the largest remnant of vegetation left on the heavily cleared Liverpool Plains.

There is no doubt that Leard State Forest has exceptional conservation significance as a large, highly diverse and productive remnant in a heavily cleared landscape. It is a major drought and climate change refuge which provides 'source' habitat for numerous fauna species including many threatened species.

The proposed Tarrawonga mine expansion will clear 397 hectares of native vegetation, taking the total clearing from mines in the Leard Coal Complex to close to more than 4,500 hectares. Over 3,500 hectares of that is within Leard State Forest, an important public forest that should not be alienated and destroyed for private profit. The mines, cumulatively, will impact on habitat for up to 36 threatened species which are known or likely to occur in Leard State Forest, including Painted Honeyeater, Koala, Turquoise Parrot and Eastern Cave Bat.

The White Box Grassy Woodland in Leard State Forest is part of one of the largest and most intact stands of the ecosystem remaining. The structural condition of the forest is extremely high compared to most Box Gum woodland. Its conservation significance is outstanding. We are

surprised that the proponent has only mapped 13 hectares of Box Gum woodland in the proposed area. This does not seem to match with previous mapping conducted by Boggabri Coal for the area of Leard State Forest in question, and we therefore question its accuracy.

We consider that the effect on global greenhouse gas emissions of the Tarrawonga coal mine and adjoining mines and proposals are completely unacceptable. These mines will make a very significant contribution to the carbon footprint of the State. Based on the volumes of coal to be extracted, we estimate that adjoining existing and proposed mines may collectively release in the order of 50M tonnes CO₂-eq per annum, which over a 21 year period will amount to over 1 billion tonnes.

This has global significance and will play a major role in preventing NSW, Australia and the planet from reaching the urgent reductions in greenhouse gas emissions that are required to prevent accelerated global warming and to move to a zero carbon economy.

Furthermore, not only does the proposal contribute significantly to global warming but it destroys an existing carbon sink and also undermines biodiversity adaptation efforts by destroying what is clearly a crucial climate change refugia on the heavily cleared Liverpool Plains. The proposal therefore, severely hinders both climate change mitigation and adaptation.

The Tarrawonga expansion proposal is partly located on a State Forest area that, under the NSW Forestry Act 1916, is supposed to be managed for the public good, the preservation of soil, the provision of timber and the protection of flora and fauna. Instead, the Tarrawonga proposal is that this irreplaceable area is destroyed for private gain. The cost to the community of the loss of the ecosystem services and non-use values the forest provides is severe.

We are deeply concerned about the impacts of the proposal on the surrounding community and believe the mine should also be rejected purely on the grounds of its social impacts. The community now faces encroachment of coal mines on to their farms, loss of community networks as farmers sell up and leave, constant machinery noise, incessant train and truck movements, reduced air quality with associated serious health impacts, reductions in their water table and the closure of their main flood-proof access road. The NSW Government should be putting the health, resilience and integrity of local communities, which are the life-blood of our nation, above the interests of corporations seeking cheap natural resources for export.

We are gravely concerned about the proposed 'permanent' re-alignment of Goonbri Creek which is a 4th order stream in good to excellent condition. It is vital to groundwater recharge of Barbers Lagoon, which would undoubtedly qualify as a Key Environmental Asset in the Murray-Darling Basin Plan, and the township of Boggabri. The proposal would effectively destroy this important natural asset and turn it into a drainage channel for the coal mine. This mine should not, under any circumstances, be allowed to destroy Goonbri Creek in this fashion, but must be halted at least 300m away from this important creek system.

It is important that the cumulative environmental and social impacts of all the current and proposed mines in the vicinity are fully considered by the Minister for Planning and the Department of Planning when addressing this proposal. This needs to include the impacts already caused or proposed by the Boggabri Coal Project and existing Tarrawonga Coal Mine and the likely impacts of the Maules Creek and Goonbri Projects.

We are extremely concerned that there has been no detailed assessment undertaken of the potential for the utilisation of underground mining techniques instead of open-cut methods. There

are a number of deep coal seams in the area and a detailed assessment and cost-benefit analysis is required of the potential to contain the mining in the area to underground methods. There is no doubt that such an approach would markedly reduce the environmental and social impacts.

We believe that the Environment Assessment does not give due recognition to the extraordinary conservation significance of Leard State Forest. It has been identified in the Namoi Biodiversity Strategy as part of a high conservation value corridor. The Assessment also underestimates the condition of the vegetation in the project area, which is extremely intact in comparison with most Box Gum Woodland stands. The Assessment does not make a proper assessment of the importance of Leard Forest for climate change adaptation and it does not adequately assess the cumulative impacts of clearing including background rates of clearing and other proposed mines in the district and adjoining areas (such as coal seam gas proposals in the Pilliga). We have no doubt that the cumulative clearing that is currently planned for the Leard State Forest and adjoining areas of the Namoi catchment will cross a critical threshold leading to accelerated species loss. Therefore, we conclude that the Assessment drastically underestimates the significance of impacts on threatened species and communities.

The proposed offsets will not compensate for the loss of Leard State Forest and we do not believe that they do provide like for like habitat. In short, Leard State Forest can never be replaced. Furthermore, we do not believe the rehabilitation proposals for the mine will ever be delivered. There has never been a functioning endangered ecological community of Box Gum woodland produced from scratch through rehabilitation. The rehabilitation plan is to spread a very thin layer of topsoil over the overburden, but the depth proposed is not sufficient to ensure the water holding capacity will sustain White Box and other trees which currently occur there.

This mine and adjoining mines will forever change the topography and surface-water run-off from the region. The mines collectively divert substantial volumes of water away from natural water systems which will degrade their health and integrity. Recent rainfall events in the region have seen the adjoining Boggabri Coal Mine end up with a water surplus of 700ML which is being pumped into the Namoi River. These events have thus revealed major flaws in the modelling of surface water inflows and mine management and planning. We expect similar problems with other mines in the region, and believe that the proposed water balance modelling and planning for the Tarrawonga expansion should be reviewed in light of the recent events.

In addition, in heavy rainfall events, large volumes of water from overburden embankments will forge new run-off pathways onto and across the floodplain. The disturbance of surface water flows from the existing mine due to the overburden embankments has directed large volumes of mine water from within the project area onto the flood plain during the November 2011 and February 2012 floods. The increased project area in the Goonbri Creek Catchment due to the mine expansion will exasperate this issue.

The plan to leave a final void where there was native vegetation is not best practice. The void does not return the land to its pre-mining land capability and creates an evaporative pump that permanently negatively impacts on the ground water. The water contained in the final void will increase in toxicity and be a threat to native animals in the area and as shown in the recent flood event could be a major threat to the floodplain.

We believe that the Tarrawonga coal expansion will lead to unacceptable and irreversible social and environmental impacts particularly in conjunction with adjacent proposed mines. We urge you to properly consider all of this information and to reject the proposal.

Carmel Flint
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