



Hunter Environment Lobby Inc.

PO Box 188
East Maitland NSW 2323

Sara Wilson
Major Projects Assessment
NSW Department of Planning & Infrastructure

Friday 14 June 2013

sara.wilson@planning.nsw.gov.au

Dear Ms Wilson,

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organisation that has been active for more than fifteen years on the issues of environmental degradation, species and habitat loss, as well as climate change.

Please find attached a submission of objection to the proposed expansion of the Moolarben Stage 1 open cut mining operation on the headwaters of the Goulburn River in the south-western catchment of the Hunter region.

HEL is very concerned that no Director Generals Requirements (DGRs) were issued for this large project extension to access a further 30 million tonnes of coal.

HEL would appreciate an explanation of how NSW Department of Planning and Infrastructure proposes to assess the merit of this modification to a mine that has another modification and a Stage 2 proposal currently under assessment.

Without DGRs, what measures will be used to decide if the environmental assessment of this major modification is adequate?

HEL is of the opinion that this modification proposal not be considered until 'The Drip' is protected within Goulburn River National Park.

Yours sincerely

Jan Davis
President

Submission of Objection

Moolarben Mine Stage 1 Modification 9

HEL wishes to object to the proposed expansion of the Moolarben Coal Mine project (the proposal) on the grounds of cumulative impact on the Goulburn River, on biodiversity, on amenity, on community, on Aboriginal cultural heritage and on increased greenhouse gas emissions.

The proposal to increase the footprint of the currently approved Open Cut 1 and Open Cut 2 by 25 % is a significant enlargement of approved operations and will generate a significant impact on the surrounding environment and community.

HEL does not consider that the cumulative impacts of noise, dust, blasting and diesel emissions have been accurately assessed in relation to the Wilpinjong Mine and the new Ulan Mine open cut operations.

The proposal to remove ridgelines at a height of 100m, 60m and 30m has not been adequately assessed for noise and dust levels at those heights in the surrounding landscape. HEL considers that predictions for impact on the residents of Ridge Road and Cooks Gap have been vastly understated.

The assessment notes that the whole mine operation will have a daily water demand of 6.9 ML/day and an annual requirement of 2,520 ML/year. There has been no assessment of the cumulative loss of water to the Upper Goulburn River catchment from the combined interception and use of water by Wilpinjong Mine, Ulan Mine and all proposed stages of the Moolarben Mine complex.

The cumulative impacts on water volume and water quality in the Goulburn River have not been adequately assessed. Moolarben Mine has proven to be unable to operate under current conditions of approval and have caused major pollution incidents in the Goulburn River.

No further impacts on base flows and surface flows should be considered until an independent regional water study is conducted on the current cumulative impacts of the three mining operations in the Upper Goulburn River water source.

HEL considers that the ongoing decline of water quantity and quality in the Upper Goulburn River is unfairly impacting on downstream river ecology and other water users. This long term decline has not been assessed in the cost benefits analysis of the proposal.

The predicted local, regional and national benefits of the proposal have not accurately assessed the long term costs to the health of the river system and impacts on downstream water users.

HEL considers that the additional destruction of 171.4 ha of native forest and woodland vegetation communities will result in a major cumulative loss of high conservation

value vegetation in the region. HEL is particularly concerned by the additional loss of 16.5 ha of the critically endangered White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grassland (CEEC).

When considered with the cumulative area of currently approved vegetation removal from the regional landscape, the proposed biodiversity offset package will not replace the loss of mature features such as tree hollows and mixed aged vegetation. Nor will it replace the destruction of intact CEEC.

The loss of ridgeline vegetation and associated landscape habitat features such as rock shelters and crevices will not be replaced in proposed mine rehabilitation.

HEL does not consider that the fauna survey was adequate. The recording of only two threatened species in a landscape where all other previous surveys have recorded a broad range of fauna species is an indication of poor effort and methodology.

Either that, or it is an indication that current mining operations have had a major impact on the habitat values of the areas surveyed and that native species have been pushed out of the area because of increased noise, dust, vibration, light pollution and blasting activity.

The impacts of open cut mining operations on adjacent native species habitat has not been adequately assessed, particularly in the neighbouring national estate areas of the Goulburn River National Park and Munghorn Gap Nature Reserve.

The costs of these impacts have not been adequately assessed.

HEL is also concerned that 33 Aboriginal cultural heritage sites were recorded in the area of impact and are likely to be impacted by the proposal. The cumulative loss of Aboriginal cultural heritage sites across the three mines in the region has not been included in that assessment.

The regional significance of the cumulative loss of Aboriginal cultural heritage sites has not been considered.

HEL does not support the conclusion in the assessment that an additional 27,434,059 t CO₂ –e of per year of greenhouse gas emissions is insignificant.

While the assessment measures this as a volume in Australia's overall greenhouse gas emissions, it fails to present this figure as a percentage of NSW emissions. Any increase in carbon emissions will cause significant costly environmental damage through enhanced climate change impacts.

These impacts have not been adequately assessed in the economic analysis of the proposal. HEL cannot support the conclusion in the assessment that *'The proposed modification will provide important benefits to the local, state and national economies.'*¹

¹ Moolarben Stage 1 MOD 9 – Vol 1 EA Main Report

