



Hunter Environment Lobby Inc.

PO Box 188
East Maitland NSW 2323

Department of Planning & Environment
PO Box 39
Sydney NSW 2001

Thursday 30 July 2015

Submission of Objection
Moolarben Coal Complex - UG1 Optimisation Modification
Stage 1 (05_0117 MOD 12) & Stage 2 (08_0135 MOD 2)

Hunter Environment Lobby Inc. is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

We welcome the opportunity to comment on the proposed modification of the Moolarben Coal Complex at the south western end of the Hunter catchment.

Hunter Environment Lobby is concerned about the ongoing proposed changes to the mine layout and operations, particularly in light of Moolarben Stage 2 being approved in February this year after a very extensive assessment and approvals process.

The proposal to double the extraction of coal from Moolarben underground number one (UG1) is a major change to the approval and should be assessed with greater effort than the reports currently on exhibition for comment.

Our key comment is that the proposal is significant and has not been given the level of detailed assessment required to identify the extent of environmental impacts.

The heavy reliance on past assessment reports produced seven years ago is not acceptable. There have been major changes at adjacent mines during that period of time.

The assessment of cumulative impact of mining operations in the region is seriously lacking in all reports provided with this proposal.

Hunter Environment Lobby believes that considerable increased impact will occur through the proposed 20% increase in subsidence across UG1. This will be caused by an increase in extracted seam thickness, an increase in panel width to depth ratio, increased

panel lengths and reduced pillar width to depth ratio. We consider that these major changes to the mine plan will cause significant cumulative environmental impact.

The impacts include increased ponding, cracking of bedrock and disturbance of thin alluvial and colluvial soils in drainage lines and a predicted 15% increase in cliff line collapse.

The assessment of biodiversity and water sources has not provided any detailed analysis of these impacts as predicted for this major expansion.

Hunter Environment Lobby objects to Moolarben Stage 1 Mod 12 and Stage 2 Mod 2 for the following reasons:

1. Inadequate assessment of the proposal, particularly regional cumulative impacts. The groundwater model does not include the predicted levels of drawdown from the Ulan or Wilpinjong mines.
2. The failure to identify, map and conduct a significant impact test for Central Hunter Valley eucalypt forest and woodland as critically endangered under the EPBC Act.
3. Inadequate justification for the proposal. There are no compelling reasons given for the alteration of the currently approved mine. The predicted job numbers are entirely unrealistic and not guaranteed, particularly in the context of 225 recent job losses at two other Yancoal mines in the Hunter region.
4. Yancoal has demonstrated ongoing problems with managing the mine to conditions of approval. The recent highwall collapse at the open cut operations is a case in point, along with previous water pollution events, illegal land clearing and other breaches of consent conditions.
5. The proposed peak of 9 additional trains per day will impact on the community throughout the Hunter coal chain. There has been no assessment of cumulative noise and dust impacts from increased train movements along the Sandy Hollow Railway Line and onto the main Hunter lines. All coal wagons should be required to be covered and washed.

Hunter Environment Lobby recommends that the proposed modification to the Moolarben Coal Complex be rejected as an ecologically unsustainable development.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Jan Davis', with a stylized, flowing script.

Jan Davis
President