

Major Project Assessments  
PO Box 39  
Sydney NSW 2001

Wednesday 29 July 2015

**Submission of Objection  
Moolarben Coal Complex - UG1 Optimisation Modification**

Mudgee District Environment Group (MDEG), based in the Mid-Western Region local government area in NSW, is working for the conservation of our natural heritage and a sustainable future for our children.

**Introduction:**

MDEG objects to the ongoing expansion of the extensive Moolarben Coal Mine operations because there has been no attempt by the NSW Government to conduct an independent regional groundwater study to investigate and quantify the range, probability and severity of potential risks that could result from the current mining approvals on surface and groundwater connectivity and baseflows in the Goulburn River.

MDEG objects to this second modification of Moolarben Stage 2 and twelfth modification to Moolarben Stage 1 because the cumulative impacts of the current approvals have not been taken into account. The ongoing modification process for this large mining operation indicates a lack of clear planning, design and orderly application of the assessment and approvals process within NSW.

The requirement for two modifications of Moolarben Stage 2 immediately after a rigorous approvals process finalised in February 2015 demonstrates a clear failure in the management of project design and assessment.

The ongoing change in environmental and social impacts from this large mining operation provides no security for the community. MDEG does not support the claims by Yancoal that each modification will cause no additional impact. This has proven not to be the case, particularly in relation to the number of properties acquired by the company.

The neighbouring and broader community has experienced greater impacts from the Moolarben Coal Complex than predicted. The cumulative environmental impacts have not been adequately assessed, managed or mitigated.

#### **Unsafe Mine:**

Yancoal has demonstrated an inability to safely conduct mining operations at the Moolarben Mine under existing conditions of approval. The recent highwall collapse at Open cut 1, threatening the integrity of the Ulan-Wollar public road, has caused a major social and environmental impact.

The lack of information provided to the community by Yancoal or any associated Government agencies about the extent of the damage and its remediation is inexcusable.

This breach of mine safety is one of many in a poor history of environmental damage. It clearly demonstrates that the Moolarben Mine cannot be operated within the parameters of the conditions of approval.

There should be no further changes to the current approval, particularly increased extraction rates.

#### **Increased underground extraction rate:**

MDEG does not support the current proposal to double the extraction of underground coal through a major reconfiguration of underground one (UG1), especially by the proposal to reduce the width to depth ratio of chain pillars by 50%.

The proposal to increase maximum subsidence by 20% through an increase in extracted seam thickness, increase in panel width to depth ratio, increased panel lengths and reduced pillar width to depth ratio has not been assessed with any scientific rigor.

MDEG objects to the conclusion in the assessment report that the increased level of subsidence will be generally consistent with currently approved performance measures causing minimal additional environmental impacts.

The lack of rigorous assessment of the proposed changes to UG1 provides no basis for this conclusion.

#### **Poor biodiversity assessment:**

We note that the Flora and Fauna Impact Assessment (Appendix E) fails to assess the impact on biodiversity of a 20% increase in subsidence across the whole of UG1.

The report also fails to identify that Central Hunter Grey Box-Ironbark Woodland in the NSW North Coast and Sydney Basin Bioregions is now contained in the Federal listing of Central Hunter Valley eucalypt forest and woodland as a critically endangered ecological community under the EPBC Act.

This is a major failing of the assessment of the proposal and clearly demonstrates the lack of scientific rigor.

MDEG considers that the poor biodiversity assessment provides sufficient grounds to reject the proposal.

**Poor community consultation:**

MDEG wishes to note that the community consultation in regard to this major change to the Moolarben Mine operations did not include targeted stakeholder engagement or a community newsletter outlining the extent of the modification. This also did not occur with the Stage 2 Mod 1 proposal that appeared in May.

MDEG has a position on the Moolarben Community Consultative Committee (CCC). The first meeting of the new CCC under the stage 2 approval was held on 6 May 2015. The Stage 2 Mod 1 was already on public exhibition. There had been no prior information provided to the CCC.

A very quick and confusing snapshot of both Stage 2 Mod 1 and Mod 2 proposals were presented within this lengthy first meeting. No further information was provided prior to Mod 2 appearing on public exhibition.

**Lack of certainty:**

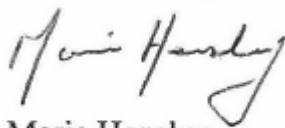
We consider that, in the context of recent job losses at other Yancoal mines in the Hunter and the continuing decline in thermal coal prices, the assessment of public benefit of the proposal cannot be guaranteed.

The social and environmental impacts of the Moolarben Coal Complex have been incorrectly assessed and predicted in the past. Yancoal cannot be trusted to operate the mine safely.

**Conclusion:**

MDEG objects to the modification on these grounds and recommends that the proposal not be approved.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marie Hensley', with a stylized flourish at the end.

Marie Hensley  
Secretary