

NSW Planning & Environment

GPO Box 39, Sydney NSW 2001

26/11/17

Dear Development Assessors,

RE: 17_8711 MOD 14 Moolarben Coal

Bathurst Community Climate Action Network was formed in 2007 and has over 100 members and supporters in the Bathurst/Orange/Lithgow region of the Central West of New South Wales. We are a voluntary community committee registered with the Department of Fair Trading. Our organisation is a member of the NSW Nature Conservation Council (NCC) and Climate Action Network Australia (CANA).

We wish to object to the 14th modification to the Yancoal-owned Moolarben Mine near Mudgee. We are in principle opposed to any expansion of coal mining in Australia. We believe coal mining should be phased out as early as possible and replaced by renewable energy sources in order to make an effective contribution to global greenhouse gas emissions.

We would also like to make the following points:

1. MCO proposed increase of licenced water discharge into the Goulburn River to 20 million litres per day will further degrade water quality and cause additional ecological stress to the river. The cumulative impact with Ulan Coal and Wilpinjong Coal Mines already approved mine water discharges will alter the natural flow regime and dump up to 30 tonnes of salt per day into the river system.
2. There has been no independent study of the cumulative impact of mining on the headwaters of the Goulburn River.
3. The agreement in The Drip Deed to protect additional areas of land as State Conservation Area has not been met under the agreed timeframe of March 2017.
4. Areas of two critically endangered ecological communities will be destroyed and habitat for 9 threatened bird species and 5 threatened microbat species recorded in the area will be affected. There is also loss of potential habitat for Koala, Regent Honeyeater and Brush-tailed Rock Wallaby.
5. The biodiversity offset strategy has not been finalised.
6. The proposal to increase coal production to 22 mtpa until 2038 is an unacceptable increase in carbon emissions, including fugitive emissions. Climate change is an

imminent critical threat to the environment, society and the economy. These costs have not been assessed.

7. The increased coal production will not increase jobs nor guarantee job security.
8. Compliance with noise and dust conditions is based on ongoing purchase of properties that were not afforded acquisition rights in previous approvals. This has caused cumulative social impacts that have not been assessed.

We also make the following points:

1. The current MCO discharge licence of 10 ML/day has never been used. They are now applying to double it to 20ML/day. The existing licence of 10ML/day should be more than adequate.
2. The Water Management Plan for previous approvals, required by October 2016, is not available.
3. Brine from water treatment plant used for dust suppression will drain into sediment dams that are designed to overflow into the river adding more salt that hasn't been accounted for.
4. Groundwater model assumptions do not reflect potential impacts on springs and the upper groundwater system.
5. Mine modelling failed to predict the 5 million litres per day groundwater make into Underground One. The long term effect of dewatering and draining the landscape above the mine has not been adequately assessed.
6. The increasing total salt load of the Goulburn River will threaten the Goulburn River National Park, downstream water users and the Hunter River Salinity Trading Scheme.
7. Wilpinjong Mine has a salt discharge limit of 500 EC. There needs to be consistency with MCO having the same limit, not 900 EC.

Yours sincerely,



Tracy Sorensen

President

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