

Submission of Objection to Moolarben Coal Operations (MCO) Stage 1 Mod 14, Stage 2 Mod 3

A primary critical reason why this modification should be rejected is the impact it will have on the Goulburn River. The proposed increase of licensed water discharge to 20 million litres daily will even further degrade water quality and hence create extra stress on the ecology of the River.

No independent study has been done on the cumulative impact of mining from the Ulan and Wilpinjong and Moolarben mines on the Goulburn River headwaters. To add 20 million litres daily to the discharges from the other mines without such a study is irresponsible. It will change the natural river flow and could add up to 30 tonnes of salt daily.

Given that MCO have never used their current discharge licence of 10 million litres daily, why do they need to double that? The impact of 10ML should be assessed first. Plus their Water Management Plan on previous approvals (supposed to be by October 2016) is still not available.

It does not seem that the River's health is being adequately considered or protected, especially as regard salinity, the increase of which will threaten the Goulburn River NP, downstream water users and the Hunter River Salinity Trading Scheme. There has not been any accounting for the extra salt from the water treatment plant for dust suppression, which drains into sediment p

MCO should be limited to the same salt discharge of 500 EC as Wilpinjong, not the excessive 900 EC.

There has been no assessment of the longterm impacts of dewatering above the mine, or on springs. For example, MCO modelling did not predict the 5ML per day into Underground One.

I am also concerned that the agreement in The Drip Deed, for extra areas of land to come under State Conservation Area protection has not been honoured by the due date of March 2017. MCO must do this before being given any further permissions.

Additionally lacking is the biodiversity offset strategy, which has not been finalised. Yet under this modification proposal, two areas of critically endangered ecological communities will be destroyed – despite nine threatened bird species and five threatened microbat species being recorded

there. Habitat is also likely to be lost for the Koala, Regent Honeyeater and Brushtailed Wallaby.

Locally, compliance with the noise and dust conditions is based on ongoing purchase of properties not given acquisition rights in past approvals. The grave accumulating social impacts of this remain unassessed. People MUST be treated as more than collateral damage.

And of course there is the inevitable and unacceptable impact on global warming from increasing the coal production to 22mtpa until 2038, which will NOT guarantee job security. It will guarantee to increase carbon emissions and fuel climate change, the impacts of which are evident and worsening; we should not be culpable of adding to the damage and we certainly should take these adverse impacts into account.