



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 2127
Boronia Park 2111**

Department of Planning
Re Moolarben Coal Operations Stage 1 Mod 14, Stage 2 Mod 3

On line submission

28 November, 2017

Dear Sir/Madam,

We write to object to the proposed modifications to previous approvals to Moolarben Coal Operations. The proposed changes will result in an overall 23% increase each year in open cut coal production and a 40% increase in trains each day. And all without any increase in jobs or job security.

We are a local conservation group with a close association with the Field of Mars Wildlife Refuge in East Ryde, Sydney. Our members have spent many hours over many years undertaking bush regeneration to improve the habitat quality of the small native birds and mammals living in the reserve. The adverse impacts of a fast changing climate pose an imminent and critical risk to the natural bushland and native animals in the Field of Mars Reserve which will put at risk our members' past effort to enhance natural bushland habitat in the reserve.

The increase in carbon emissions, including fugitive emissions caused by the increased coal production and associated works poses significant environmental, social and economic threats far wider than just the natural ecosystems within the Field of Mars Reserve. Despite assurances by the state government that The Drip would be protected in perpetuity this has not occurred. The Drip remains under imminent threat from coal mining activity, starving it of adequate water which is also increasingly polluted.

We object to the increase in coal production for the following reasons:

- The increase in coal production will increase the licenced water discharge into the Goulburn River altering flow regimes and further degrading water quality with discharges daily of 30 tonnes of salt.

- It is unclear how the proponent's application to increase the daily licenced discharge by 100% is justified or why such a high salt discharge limit is proposed.
- Further, no Water Management Plan is included in the supporting documents and it is unclear how discharge of brine used for dust suppression will be managed.
- There is a critical need for an independent assessment of the cumulative impact of mining on the headwaters of the Goulburn River. Increasing the total salt load of the Goulburn River threatens the Goulburn River National Park, downstream water users and the Hunter River Salinity Trading Scheme.
- The potential impacts on springs and the upper groundwater system have not been fully assessed in the groundwater modelling nor the long term effects of dewatering the landscape above the mine itself.
- The proposal will destroy two critically endangered ecological communities and habitat for 9 threatened bird species and 5 threatened microbat species. There is also loss of potential habitat for Koala, Regent Honeyeater and Brush-tailed Rock Wallaby. We find this outrageous especially given NSW's high native species extinction rates.
- Further, no biodiversity offset strategy, (even if possible for such devastation), has been finalised.
- The lack of assessment of cumulative social impacts raises serious equity issues regards this proposal and how these should be assessed.
- The proposed increase in the size of the void represents an increase in the loss of land available for eventual land use as agricultural land. Vegetation remediation post mine activity has proven largely a failure at other mine sites and NSW lacks an adequate policy on the long term remediation and management of voids.
- Inadequate supporting documents on how the increase in train movements will be managed and the amenity impact on local residents will be mitigated.

Overall, we feel that this proposal represents a significant increase in the previous approval limits of both Stage 1 and 2. The proponent has failed to provide adequate supporting documents to justify such a radical change to previous approval limits.

We urge that it be rejected until adequate documentation is provided to facilitate a proper environmental assessment according to state planning and assessment controls which are still underpinned by the principle of ecologically sustainable development.

Yours sincerely,

Cathy Merchant
RHHFFPS Committee Member