



Hunter Environment Lobby Inc.

PO Box 188
East Maitland NSW 2323

Thursday 30 November 2017

Mr Paul Freeman
Planning Officer
Resource and Energy Assessments
Department of Planning and Environment,
GPO Box 39
SYDNEY NSW 2001

Submission of Objection: Moolarben Coal Operations Stage 1 Mod 14, Stage 2 Mod 3

Dear Mr Freeman,

Hunter Environment Lobby Inc. is a regional community-based environmental organization that has been active for over 25 years on the issues of environmental degradation, species and habitat loss, and climate change.

We take an interest in the major development of mining operations on the headwaters of the Goulburn River because it is a significant tributary of the Hunter River and impacts on the operation of the Hunter River Salinity Trading Scheme.

We object to the ongoing modifications of the very large Moolarben mining complex. The disturbance footprint of this mine is significant and has not been properly assessed for cumulative impact as required by the Secretary of Planning and Environment.

The Moolarben Mine has had a significant impact on groundwater sources. This is demonstrated by the unpredicted large interceptions into the workings of underground mine one (UG1).

The landscape has a large number of springs that have not been surveyed. These groundwater dependent ecosystems (GDEs) are an important ecological asset that are permanently destroyed by mine subsidence and aquifer interference.

The unpredicted inflow of 5ML/day into UG1 demonstrates that the groundwater model developed for the Moolarben Mine complex has incorrect assumptions and needs to be better peer reviewed than in the past.

Hunter Environment Lobby does not support the proposal to increase the volume of mine water release into the Goulburn River by a further 10ML/day. The current approval has not been used to date and should be sufficient.

We support the installation of a desalination plant to treat the currently approved 10ML/day discharge rate and the proposed change to the discharge point.

However, we strongly object to the discharge volume being increased. The current salinity limit of 900 EC for water releases is too high.

This level of salt discharge at the head of the Goulburn River is way above the background levels and will result in a significant increase in salt load that has not been assessed. We have consistently objected to this limit being set at the Ulan Mine for the same reason.

The salt limit for mine water release from Wilpinjong Mine is 500EC. We support this level as a more realistic salt load for the river system that should be consistently applied across all three mines.

We do not support the conclusion of the environmental assessment that this modification will not impact on the Hunter River Salinity Trading Scheme. When the cumulative salt load from the Ulan, Moolarben, Wilpinjong and proposed Bylong mines is taken into account, there is a significant increase in salt levels in the Goulburn River above natural background.

The increasing salt load from the Goulburn River entering the Hunter River at Denman will impact on the function of the Salinity Trading Scheme over time.

The economic impact of this on the irrigation, mining and power industry in the Hunter Valley must be taken into account. The ecological impact of increased salts and heavy metal pollution has not been addressed.

Hunter Environment Lobby is also concerned about the ongoing irreversible impacts on significant biodiversity values caused by mining operations in this area.

The continued destruction of critically endangered ecological communities and threatened species habitat in the western area of the Hunter Valley is not sustainable and should not be approved.

The ongoing loss of habitat for the critically endangered Regent Honeyeater in the Hunter Region cannot be justified or adequately offset. Likewise, the ongoing loss of Koala and Brush-tailed Rock Wallaby habitat in the region is irreversible and will intensify the likelihood of extinctions.

The biodiversity survey demonstrates that a significant number of cliff line features and caves will be destroyed by this modification. These provide potential habitat for a range of threatened species, including microbats protected under Federal environmental law.

The ongoing loss of cliff lines in this area is significant and will not be replaced in the mine rehabilitation design. Cliff lines and caves cannot be replaced or offset.

The cumulative loss of hollow-bearing trees is also significant and has not been assessed for this modification.

Hunter Environment Lobby also objects to the proposed increase of coal production to 22 million tonnes per year for another 21 years. This will make it impossible for NSW and Australia to meet obligations for curbing carbon emissions.

The full cost of climate change impacts has not been assessed.

Finally, we are very concerned that the agreement made by Yancoal with the NSW Government in 2015 to protect lands surrounding The Drip has not been met. This increases the communities distrust in the mining industry to comply with any undertakings, including conditions of approval and regulations.

The Drip is a much loved iconic landscape feature and GDE on the Goulburn River that is under great threat from the Moolarben Mine complex. We expect that any agreement to protect the surrounding lands should have been met in a timely fashion.

This proposed modification of Moolarben Mine should not be assessed by the Department of Planning and Environment until such time as The Drip Deed has been met.

We do not support the ongoing increased footprint of Moolarben Mine in the local, regional and global context. This modification cannot be approved under the principles of ecologically sustainable development

Yours sincerely

A handwritten signature in cursive script, reading "Jan Davis". The signature is written in dark ink on a white background.

Jan Davis
President