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Thursday 30 November 2017

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

Introduction

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.

MDEG strongly objects to the proposed expansion of coal extraction and increased disturbance footprint at Moolarben Coal Mine. The modification will not create any new jobs but will extend the environmental impacts until 2038 and beyond.

The modification must be rejected because it does not meet the principles of ecologically sustainable development.

Key Issues of Objection:

1. Failure to honour The Drip Deed of Agreement

MDEG members are very disappointed that the agreement to protect areas of Yancoal-owned land under a State Conservation Area by March 2017 has not been met.

There should be no further consideration of this high impact modification until such time as The Drip agreement has been fully met.

We also note that current conditions of approval require “nil impact or environmental consequences” on The Drip. There is great concern in the local community that the cumulative impacts of the Moolarben Mine will not be adequately monitored or regulated.

Yancoal does not have a good record as an environmental manager with three court cases and five penalty infringement notices relating to breaches of consent conditions causing environmental damage.

2. Impacts on the Goulburn River

The environmental assessment of the modification fails to identify or adequately assess the range of impacts and risks to the Goulburn River, Goulburn River National Park and downstream water users.

There is no justification provided for the need to discharge a further 10 megalitres of water per day (ML/d) over and above the current approval. The existing approval to discharge 10ML/d has not been triggered by current mine operations.

The current approval is sufficient for any future needs to discharge mine water offsite. There is no justification to double the volume of the current approval.

The proposal to discharge 20ML/d has not been assessed for the cumulative impact on the hydrology of the Goulburn River when combined with the approved discharge rates from the Ulan and Wilpinjong Mines.

A significant change to the natural variability of flow in the Goulburn River has already occurred. This loss of seasonal flow variability would increase if the total mine discharge into the river system was increased to 65ML/d.

The assessment has not considered the total increased salt load that will occur with a limit of 900 EC on Moolarben discharges. There is no consideration of the salt loads entering the river system from the Ulan, Wilpinjong or proposed Bylong Mine operations.

The disposal of brine from the proposed desalination plant includes use for dust suppression across the mine site. This salt will drain into mine sediment dams that overflow to the river system. This additional salt load has not been considered or assessed.

The disposal of brine from the Ulan and Wilpinjong desalination plants also has a high risk of reporting to the river.

The increased salt load, above natural background levels, is a serious issue for the Goulburn River that has not been adequately assessed.

MDEG has been calling on the Department of Planning and Environment to conduct an Independent Regional Water Study on the Upper Goulburn River water source since the major expansion of the Ulan Mine operations in 1998.

The significant expansion of mining in the Upper Goulburn, the cumulative drawdown of groundwater, increased aquifer interception and need to discharge water contaminated

with heavy metals and salts from mining operations is a critical issue that must be independently assessed.

3. Impacts on Biodiversity

MDEG notes that the increased mine footprint will impact on two critically endangered ecological communities:

- *White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland*
- *Central Hunter Valley Eucalypt Forest and Woodland*

And habitat for a number of threatened bird and mammal species, including the iconic Koala, Regent Honeyeater and Brush-tailed Rock Wallaby.

One of the justifications for the modification is to alter the shape of a currently approved open cut area to prevent a potentially geotechnically unstable hill between the current pit limit and Moolarben Creek. This demonstrates a poor assessment and approvals process for Moolarben Stage 1. MDEG considers this improvement in final landform could be achieved through a different process such as the Mine Operations Plan and the Rehabilitation Management Plan.

The proposed increased mine footprint of 81.5 ha is more about access to additional coal resources, that appear to be missed in the original mine design.

We do not support that the additional land disturbance is justifiable. The assessment of biodiversity impacts is based on poor survey effort and have not been adequately offset.

MDEG does not support that loss of Koala habitat and loss of critically endangered ecological communities can be successfully offset on mine rehabilitation.

The areas to be additionally impacted on the Moolarben Mine site have irreplaceable habitat values such as cliff lines with caves and old growth trees with hollows that have taken hundreds of years to form. These important habitat resources have not been accounted for in the biodiversity impact calculations.

The cumulative loss of these landscape features has not been assessed.

4. Climate Change Impacts

MDEG strongly objects to the proposal to extract a further 24 million tonnes of coal per year (Mtpa), with associated fugitive emissions, to produce an additional 22 Mtpa of thermal coal for export until 2038. Another 21 years of increased carbon emissions is irresponsible.

The social, environmental and economic costs of climate change caused by greenhouse gas emissions are already being felt in our region and across the globe.

The NSW Government cannot justify the approval of this modification on economic grounds because no new jobs will be created.

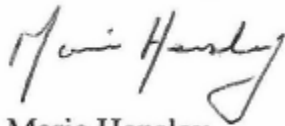
Any increase in royalty payments will be absorbed by increased emergency services costs such as the Sir Ivan bushfire in the Mudgee region last February that caused far reaching economic, social and environmental costs.

The NSW Government has a responsibility to reduce carbon emissions, not approve their ongoing production into the mid 21 century.

Conclusion

The proposed Moolarben Coal Operations Stage 1 Mod 14, Stage 2 Mod 3 will cause poorly assessed cumulative impacts on the ecology of Goulburn River, on biodiversity assets and dependent woodland species that are nationally significant and on the viability of the earth's climate to support and sustain our society.

This modification must be rejected.



Marie Hensley
Secretary