

**This is an objection to Moolarben Coal Operations Stage 1 Mod 14, Stage 2 Mod 3.**

The 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 current MCO discharge licence of 10 ML/day has never been used, they are now applying to double it. The existing licence of 10ML/day should be more than adequate. Wilpinjong Mine has a salt discharge limit of 500 EC. There needs to be consistency with MCO having the same limit, not 900 EC.

Relying on measurement of salt levels in given water discharges with the focus on one individual license does not fully evaluate the safety or otherwise of such discharges into the river. This proposal fails to account for the sheer volume of the salt load imposed and how this effects the resilience of the whole system. The proposed discharge point at Bora Creek is near the top of the Great Dividing Range, at the start of 225 kilometres of river flow down to Denman, then further along the length of the Hunter River to the sea. Mine water discharges into the Goulburn do not flow along a uniform riverbed and thus harmlessly out of sight and out of mind. Beyond the mine footprint, as the river winds its way through complexes of rocky jumbles, sandy reaches, peaty waterfalls, reed beds and chains of pools the increased flows are captured in lenses as part of the alluvial and sand sediment beds. Scattered, lodged and waiting over the length of this river system, over time they are exposed to evaporative concentration of salts and other pollutants. The cumulative impact of this proposed increase, when combined with Ulan Coal and Wilpinjong Coal Mines already approved mine water discharges, risks altering the natural flow regime along with yet another damaging elevation of salt levels at many points all along the river system.

Cumulatively these mines soon will be approved to dump up to 30 tonnes of salt per day into the river system. This proposal to further increase the total salt load of the Goulburn River will be at the cost of the Goulburn River National Park, downstream water users and the Hunter River Salinity Trading Scheme. If the water modelling truly is based on full, accurate assumptions and the proposal really does have the economic benefits touted, then we should be able to afford and have the knowledge to proceed in a way that does not involve large drain pipes discharging significant amounts of salt into the precious, irreplaceable Goulburn River. In 2017, surely we can and must do better than this 19th Century solution which will force downstream river users to subsidise the profitability of upstream coal mines.

The increased coal production will not increase jobs nor guarantee job security. In short, this is because the economic model for thermal coal is broken. It is common knowledge that right now in most parts of the world the coal industry has lost its social license to operate. The majority see the future as better without coal. It is solely the strength of incumbency which is allowing thermal coal plants and seaborne export coal to continue operating on its current scale. Coal has to compete with a growing range of alternative ever-cheaper, less polluting and more flexible means of power generation. This means, whatever happens in a volatile future, it is unlikely an industry already uneconomic and with a dominance solely based on incumbency can endure for years. Certainly business as usual cannot continue until 2038 and beyond. For now their priorities must be to cut labour costs while maximising production in the face of falling demand. This unsustainable situation means a high risk future outcome for export thermal coal of “unpredictable” collapse with little warning well before 2038. Given such uncertainty it is unconscionable that further Government approval should encourage

contractors, workers and financially dependant locals to take on debt and make plans on the strength of unrealistic predictions of job security and wealth contained in this proposal.

We already are experiencing the costly and painful beginnings of human induced climate chaos. This 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. I suggest the cost of further expanding coal mining will be greater than the benefits.

Further points of objection to this expansion are :

- Mine modelling failed to predict the 5-6 million litres per day groundwater make into Underground One. When your predictions are out by a factor of six times it is time to reassess the whole project.
- The long term effect of dewatering and draining the landscape above the mine has not been adequately assessed. Given the above points. Moving forward the dewatering of the area adjacent to the Drip and the Goulburn River to years earlier, meanwhile doubling the allowed discharge and then claiming this does not represent a substantial increase of water removed from the landscape is not credible.
- The Water Management Plan for previous approvals, required by October 2016, is not available. There has been no independent study of the cumulative impact of mining on the headwaters of the Goulburn River. The agreement in The Drip Deed to protect additional areas of land as State Conservation Area has not been met under the agreed time frame of March 2017. All of these should be done before any new expansions of mining are approved.
- 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. There is also loss of potential habitat for Koala, Regent Honeyeater and Brush-tailed Rock Wallaby. The biodiversity offset strategy has not been finalised. Again this should be addressed before any approvals are considered.
- 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. Social impacts of ever-expanding coal mining in our area have now reached a critical point beyond which recovery post mining becomes more difficult and may be impossible. Most of the information on which approval is justified is misleading, inaccurate or just plain wrong. I will expand on this in future submissions.

You're sincerely

Colin Imrie.