

Attention: Sara Wilson
Mining and Major Industry Projects
Dept of Planning and Infrastructure
GPO Box 39
Sydney 2001

SUBMISSION OF OBJECTION

Moolarben Coal Complex Stage 2 _ Preferred Project Report Project Number: No. 08_0135

Central West Environment Council (CWEC) thanks the Department of Planning and Infrastructure for taking into consideration the issues raised in submissions of objection lodged in 2009 against the proposed Moolarben Stage 2 proposal in the Mid Western Region Local Government Area. CWEC appreciates the opportunity to comment on the Preferred Project.

CWEC is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

The Moolarben Stage 2 Preferred Project, while demonstrating some reduction in the size of the impacts of a fourth large open cut coal mine and two additional underground mines within the Moolarben Coal Complex, remains a very large scale expansion of mining operations at the northern end of the Western Coalfields in NSW.

The rapid expansion of major coal mining operations in this region has been substantial since 2006 with the approval of the Wilpinjong Mine and subsequent expansions; Ulan Continued Operations (a doubling of production) and Moolarben Stage 1.

The cumulative impacts of current approved coal mining operations on biodiversity, water sources, Aboriginal cultural heritage, greenhouse gas emissions, air and noise pollution, traffic movements and negative social and economic activity in this region has been very significant.

These current impacts, in conjunction with the predicted increased impacts of the proposed expansion, must be given full, independent review because of their long term nature, and in some cases, irreversibility.

CWEC does not support the Biodiversity Offset Package proposed to mitigate the loss of over 900 ha of woodland vegetation, including 123 ha of the nationally listed critically endangered ecological community, Grassy Box Gum Woodlands and the loss of 4.1 km of two intact natural creek systems in the Murragamba Valley.

The proposed Offset Package was selected primarily on the basis of availability of land for purchase with special emphasis on finding properties outside existing mining tenements.

Other key attributes such as improvement to existing ecological corridors, linking rehabilitated mining areas to existing vegetation, land that links to other Biodiversity Offsets from other mining projects have not been met in the proposed Offset Package.

The proposed properties are in a western water catchment on different geology and are a long distance away from the area of impact. The lack of rigorous field studies on these properties raises a number of questions about their suitability as offsets.

It is also proposed that approx. 1200 ha of land to be acquired by the mine because of noise and dust impacts of the Stage 2 expansion could provide an additional area of vegetation for offsets.

While there has been some consideration of the health impacts of increased dust and noise on humans, there is no indication of investigation into the impacts of mining pollution on vegetation and threatened species habitat.

The proposed cumulative impacts on water sources, both surface flows and groundwater systems, that contribute to the Upper Goulburn River need to be independently reviewed in a Regional Water Study. The differing and conflicting water models produced by consultants employed by the mining industry need to be independently reviewed with the predictions tested against the current impacts from the combined operations.

CWEC stands by the proposal put to Department of Planning and Infrastructure in our original submission against the Moolarben Stage 2 expansion - that two major additions be made to the reserve system in the area to offset existing coal mining impacts:

1. That the Goulburn River Gorges including the Drip, Corner Gorge, riverine corridor and adjacent escarpment be added to the Goulburn River National Park to protect these unique features in perpetuity.

2. That the Murragamba and Eastern Creek Valleys be added to the Munghorn Gap Nature Reserve to adequately offset the past and present biodiversity impacts of the Ulan, Wilpinjong and Moolarben Stage 1 mines.

Yours sincerely

A handwritten signature in black ink, reading "Cilla Kinross". The signature is written in a cursive style, with the first letters of each word being capitalized and prominent. The signature is centered within a light gray rectangular box.

Cilla Kinross
President

Wednesday 22 February 2012