



# LOCK THE GATE ALLIANCE INC

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Secretary: Sarah Moles

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Mining and Major Industry Projects  
Dept of Planning and Infrastructure  
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By email to: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)

Dear sir / madam,

The Lock The Gate Alliance (LTGA) wishes to lodge an objection to the proposed Stage 2 development of the Moolarben Coal Complex (**Moolarben Coal Complex Stage 2 \_ Preferred Project Report: 08\_0135**).

LTGA represents more than 130 community groups and thousands of individual supporters concerned about the impacts of inappropriate mining and coal seam gas developments on Australia's land, water and other environmental resources, cultural heritage values and the health of residents in nearby communities.

LTGA understands that the Goulburn River is the major western tributary of the Hunter Catchment. It features unique indigenous cultural heritage values, and amazing sandstone gorges including the Great Dripping Wall and the Corner Gorge just outside the Goulburn River National Park. The scenic and environmental values of the Goulburn River have already been affected by the Ulan, Wilpinjong and Moolarben Stage 1 mines.

Overall, LTGA objects to the impact and losses associated with this project.

LTGA understands that the proposed mine has a footprint of 1546 ha. Most of this is native vegetation. 900 ha of native forest will be lost as well as 123 ha of an

‘endangered’ ecological community (box woodland) and 157 ha of a ‘critically endangered’ ecological community that provides habitat for a number of threatened woodland bird species (**Regent and Painted Honeyeaters, Hooded Robin, Brown Treecreeper and Diamond Firetail**). It is proposed that these losses will be offset by native vegetation outside the Hunter Valley catchment.

From ecological and biodiversity conservation perspectives it is not adequate to replace these areas with quite different native vegetation communities in other bio-regions. This is not replacing ‘like with like’ and will result in net losses of native vegetation cover and biodiversity values in the Hunter Valley. This is contrary to the targets set by the Hunter-Central Rivers Catchment Management Authority in their government-endorsed Catchment Action Plan and undermines the efforts made to date by community groups, landholders and state government agencies working in partnership to improve catchment conditions.

Furthermore, Australia is signatory to the International Convention on Biological Diversity and has obligations to protect threatened species and restore their habitats. Extinction is forever. It is simply unacceptable to further threaten endangered species and their habitats for short term monetary gain.

LTGA notes that the offset package also fails to include the culturally and scenically significant river corridor. The Drip and Corner Gorges are cherished landscape values deserving permanent protection, appropriate management and on going public access. LTGA understands that 148 Aboriginal Cultural Heritage sites will be affected. Five sites of high significance and 16 of medium significance will be removed and a further 2 highly significant sites and 7 of medium significance will be disturbed and/or potentially threatened by land subsidence.

For LTGA one of the most serious concerns with any inappropriate development is the potential impact on water resources. As far as we know, life cannot exist without it. Australia is the driest inhabited continent and has the most variable hydrology. LTGA believes our water resources are our most precious natural asset and should be valued accordingly. Taking unquantified risks with ecosystem processes that are not well understood is not acceptable. In this case, the local (and well-informed) community has no confidence that the groundwater modelling accurately predicts the impacts on groundwater sources. We are advised that there are significant differences between Moolarben and Ulan Coal Mines groundwater assessments and that there is a risk of long term damage to the Goulburn River and its connected groundwater system.

The project water balance indicates approximately 3850 ML/annum or 10.55ML/day of water will be required suggesting that there will be a water deficit in 23 of the 24 years of the proposed mine’s life. That is, up to 1990ML more water will be required than is available.

Finally, LTGA believes the project should be rejected on the grounds of its greenhouse emissions. We understand that the project will produce more than 23 Million tonnes (co<sub>2</sub><sup>e</sup>) year, adding to Australia's already poor track record in reducing global green house emissions. Such increases inconsistent with national carbon reduction policies, and will add to the increasingly expensive consequences of climate instability.

Thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Moles', with a horizontal line underneath.

Sarah Moles,

Secretary.