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Hunter Branch

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Mining and Major Industry Projects
Department of Planning and Infrastructure
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Dear Sir/ Madam

MOOLARBEN COAL COMPLEX STAGE 2: PROJECT NO 08_0135

The Hunter Branch of the National Parks Association of NSW (NPA) wishes to raise objections to the Moolarben Coal Complex Stage 2 preferred proposal (MP08_0135).

NPA is a non-profit community organisation that promotes protection of the integrity and diversity of natural systems throughout the State and beyond. It has a particular interest in the protection of the State's biodiversity.

We request that the proposal be considered in the context of the cumulative impact resulting from all mining activity in the locality, including the Ulan, Wilpinjong and Moolarben Stage 1 mines. Large-scale degradation of landscape values, biodiversity and groundwater systems, as well as contribution to climate change, is the price paid for unlocking the monetary value of the region's coal deposits. These disbenefits (which are persistent on an intergenerational timescale) should be appropriately valued and factored into the assessment of net community benefits resulting from the proposal.

If approved, the proposal would result in unacceptable impacts on the surrounding environment. These include the following.

- A mine disturbance footprint of 1,546 ha of native vegetation, including 4.1 kms of Murragamba Creek.
- Clearing of over 900 ha of native forest, 123 ha of which is Box Woodland endangered ecological community. Destruction of the latter is inconsistent with the objects of the *Threatened Species Conservation Act 1995*.
- Destruction of at least 148 indigenous cultural heritage sites.

The proposed biodiversity offset package is inappropriate as it does not represent 'like for like', and does not satisfy the 'improve or maintain' test at the bioregion scale. Should the proposal be approved, it should be subject to an alternative offset package that addresses these issues. The package should include the culturally and scenically significant river corridor known as The Drip and Corner Gorges, thereby securing long term protection, appropriate management and public access.

The scale of water extraction required to operate the complex (3,850 megalitres/annum) is particularly concerning because of the likely risk of irreversible damage to the important groundwater systems of the Goulburn River. The existence of significant disparities between the groundwater assessment for the proposal and that for the nearby Ulan mine suggests that the modelling warrants an independent expert review.

We note that the proposal will result in the annual production of 17 Mt of coal or 23.7 Mt of greenhouse gases (CO₂-equivalent). In keeping with recent court decisions, these emissions should be matched by suitable offsets.

Owing to the complexity and scale of the proposal, the cumulative impact of multiple mining mega-projects in the locality, and the likelihood of major irreversible impacts on the downstream catchment, we request that the proposal be scrutinised by an independent expert panel or Planning Assessment Commission (PAC).

Yours faithfully



Ian Donovan
President, Hunter Branch
National Parks Association of NSW