



PCU030886

THE COLONG FOUNDATION FOR WILDERNESS LTD.

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Mining and Major Industry Projects
Department of Planning and Infrastructure
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Department of Planning
Received

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Scanning Room

**Re: Moolarben Coal Complex Stage 2 Project No: 08_0135
Submission as an Objection**

The Colong Foundation for Wilderness Ltd opposes the proposed Moolarben Coal Mine Stage 2 that seeks to expanded open cut and underground operations. The proposal would cause unacceptable impacts on surface and groundwater, and adjoining areas of outstanding natural beauty, which include Munghorn Gap Nature Reserve and the Goulburn River National Park.

Further the Moolarben Stage 2 Preferred Project Report (PPR) offset package does not propose to transfer 'The Drip' and 'Corner Gorges' to the adjoining Goulburn River National Park. The PPR also does not propose to secure continued public access or the long term protection and management of scenic Goulburn River corridor.

The Foundation understands that the proponent, Moolarben Coal, was asked by the community, local council, the Office of Environment and Heritage, and the Department of Planning and Infrastructure to include 'The Drip' and 'Corner Gorges' in its proposed biodiversity "offset package". Such requests would not have been ignored if the Crown had remained the land owner.

As you would appreciate 'The Drip' and associated walking track, as well as the southern cliff of the 'Corner Gorge' were converted from Crown lease to freehold title. The Crown should not have ceded its residual interest in the land. Even if the NSW Government did cede its interest in the relevant land titles, it should have done so only with adequate covenant(s) over the relevant land title(s) to ensure on-going public use and enjoyment of the land and adequate environment protection. Establishing such covenants would also have ensured that the appropriate protection of important heritage assets on the subject land was not contingent upon the further intensive exploitation of coal resources.

Nevertheless, appropriate steps should now be taken to ensure that an adequate river corridor, that should include the scenic features known as 'The Drip' and 'Corner Gorges' are added to the adjoining Goulburn River National Park. Such a reservation would ensure the long term protection and appropriate management of its biodiversity, riparian habitat and community amenity of these heritage landscapes. The proposed national park addition would also ensure public access.

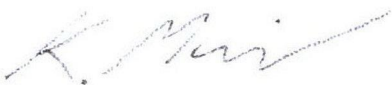
The Department of Planning and Infrastructure should appoint an independent Planning and Assessment Commission (PAC) panel to fully scrutinise the Moolarben Coal Complex Stage 2 Project No: 08_0135 for the following reasons:

- The proposed offset package is inadequate as it does not the river corridor that includes 'The Drip' and 'Corner Gorges';

- The so-called biodiversity offsets proposed are located outside the Hunter Valley catchment, are not a 'like for like' conservation 'outcome', but a net loss to the bio-region of native vegetation and a reduction in the east-west vegetation corridor;
- The Stage 2 mining proposal would damage for at least 100 years, the Goulburn River through greatly reduced surface water flows, particularly in dry periods due to the intended lowering of near surface groundwater aquifers to unacceptable levels;
- Estimated cumulative water use of this proposal and that of the surrounding open-cut coal mines is excessive, with water use for Moolarben Mine estimated to increase to 10.55ML/day;
- The loss of in stream groundwater dependent base flows would also adversely affect the downstream riparian environments in the Goulburn River National Park, and mine site runoff would greatly increase salinity and turbidity levels in the Goulburn River;
- As there are significant disparities between the Moolarben Stage 2 proposal and previous groundwater assessments for the nearby Ulan Coal Mines, the community does not have confidence in the reliability of the groundwater studies for this proposal;
- The proposed water for coal washing is not appropriately sourced from Ulan Coal Mine groundwater make, but instead the proponent inappropriately seeks additional water extraction rights for the borefield adjacent to the Goulburn River;
- The proposal includes clearing of an additional 900 hectares of native forest, including 123 hectares of an EEC Box Woodland, a size reduction for an irreplaceable ecosystem which should be protected from further clearing;
- The proposal has an excessive disturbance footprint of 1546 hectares of native vegetation, including 4.1 kms of Murragamba Creek, 4.1 kms of Eastern Creek and a direct impact on over 148 archaeological sites (from scatters to rock shelters);
- Production 17Mt coal or 23.7 Million tonnes (CO2-e) year of Greenhouse Gases fuelling further climate instability; and
- Potential noise levels radiating from the proposal, particularly the ridge top location of a coal product conveyor on is unacceptable to the local community; and
- Excessive amounts of dust emanating from this very large open-cut mining expansion proposed are also unacceptable to the local community, particularly given the poor rehabilitation outcomes at this open-cut mine.

Thank you for the opportunity to make a submission.

Yours sincerely,



Keith Muir
Director
The Colong Foundation for Wilderness Ltd

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