

**Sara Wilson - Project No: 08\_0135**

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**Date:** 3/5/2012 12:54 PM  
**Subject:** Project No: 08\_0135  
**Attachments:** Moolarben.doc

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**NEFA  
 North East Forest Alliance  
 Hunter Region  
 P.O. Box 9 Singleton 2330**

**March 5th 2012**

**Department of Planning, Mining and Major Projects**

**Re: Moolarben Coal Complex Stage Two; Preferred Project Report: Project No. 08\_0135**

**We write to object to the failure to protect the Drip and Corner Georges in the proposed Stage Two Moolarben expansion project. This area should be accorded permanent protection as an addition to the Goulburn River National Park. Major damage to the catchment including associated groundwater systems associated with the Ulan, Wilpinjong and Moolarben mines will be greatly exacerbated by Stage Two and the failure to protect this significant area.**

**We are informed that:**

- Cumulative water use by the three coal mines is estimated at approximately 30-40ML/day (10-12 gigalitres/annum).
- Water use for just the Moolarben Mine is estimated to be 10.55ML/day (3850 ML/annum).
- A water deficit is predicted for over 20 years (up to 1990ML extra water required).
- There is no confidence that the groundwater modelling accurately predicts water impacts – there are significant disparities between Moolarben and Ulan Coal Mines groundwater assessments. 30-40ML/day (10-12 gigalitres/annum).
- Water use for just the Moolarben Mine is estimated to be 10.55ML/day (3850 ML/annum).
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- **We consider that:**

1. Water for coal washing should be first sourced from Ulan Coal Mine surplus groundwater before any extraction from the Northern Borefield (adjacent to the Goulburn River).
2. The clearing of an additional 900ha of native forest (123ha EEC Box Woodland)
3. The disturbance footprint of 1,546 ha of native vegetation including 4.1 km of Murragamba Creek, 4.1 km of Eastern Creek and a direct impact on over 148 archaeological sites (from scatters to rock shelters) is unacceptable.
4. Biodiversity offsets should not be located outside the Hunter Valley catchment. The offsets do not represent “like for like” nor replace the net loss to the bio-region or the

- east- west vegetation corridor connecting the coastal forest to the western woodlands.
5. The production of 17 million tonnes of coal or 23.7 million tonnes CO<sub>2</sub>-equivalent/year of greenhouse gases unacceptably contributes to further climate instability.
  6. Excessive noise levels are unacceptable. For example, the location of the conveyor on the ridgetop.

In 2006 we objected to the proposal on the basis especially of its impacts on biodiversity, which we summarised in some detail. In particular, we objected to the proposal being approved on the basis of a patently inadequate, unjustifiably complacent assessment. And in addition we submitted the assessment was invalid in addressing impacts of Stage One only. The loss of biodiversity values in the Region since that time has been severe. We attach this submission as detailing objections to the further biodiversity impacts of the proposed Stage Two expansion.

From the outset, and again now with this Stage Two Report, there has been a shameful failure to adequately assess and take account of the cumulative impacts of the proliferation of coal mines and mine expansions in this Region.

**At the very least, we urge most strongly that any approval be conditional on the Drip and Corner Georges being accorded permanent protection as an addition to the Goulburn River National Park.**

**Barrie Griffiths.**