



ORANGE FIELD NATURALIST  
& CONSERVATION SOCIETY INC.  
PO Box 369, ORANGE NSW 2800

Att: Stephen O'Donoghue  
Major Planning Assessments  
Department of Planning and Infrastructure  
GPO Box 39  
Sydney 2001

[stephen.o'donoghue@planning.nsw.gov.au](mailto:stephen.o'donoghue@planning.nsw.gov.au)

**Submission of Objection**  
**Cobbora Coal project**  
Application No: 10\_0001

OFNCS was established in 1975, incorporated in 1993 and has about 100 individual and family members. Through its membership the Society has considerable professional expertise in natural history and knowledge of the flora and fauna of the study area delineated in the Environmental Assessment.

The Orange Field Naturalist and Conservation Society Inc. (OFNCS) is opposed to the Cobbora Coal Project (hereafter called The Project). The main justification for the Society's objection lies in the following:

The footprint for The Project is approximately 47 km<sup>2</sup> and contains significant remnant woodland as well as threatened plant and animal species, 12 of which will be subject to local extinction. This is not acceptable. Many species are already declining due to expansion of other mine sites in the area and the cumulative effects of this has not been taken into consideration.

There is no economic justification for the proposal; indeed it is not even economically viable. A genuine cost-benefit analysis is needed to be conducted prior to any consideration of destruction of biodiversity values.

OFNCS supports the position of the Central West Environment Council's submission in respect of the above matters as well as the following:

There is a lack of confidence that mine rehabilitation will be adequate to address the loss of habitat for threatened and declining plant and animal species.

The surveys for flora and fauna do not appear to have been as thorough as they could have been to detect rare species.

The offset strategy appears to be based on flawed methodology and is, at any rate, provided with insufficient detail to be adequately critiqued. This means that there is a failure to meet the Director General's Requirements.

The Project will interfere with the aims and objectives of the Central West Catchment Management Authority's regional corridor mapping by destroying a number of important areas and this has not been adequately addressed by the offset package.

There has not been adequate consideration of the impact of loss of water availability to terrestrial fauna species during drought, particularly the effect on deep pools as drought refugia in ephemeral streams, the degradation of riparian vegetation and other groundwater-dependent ecosystems.

In general, The Project does not appear to be well justified on either economic or environmental grounds. This method of electricity generation is outmoded and the government should be considering more sustainable alternatives that do not produce so much carbon emission.

The Society considers that there are adequate alternatives to this proposal for it to be not approved.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Austin', with a stylized, cursive script.

John Austin

President  
OFNCS

16<sup>th</sup> November 2012