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Major Planning Assessments Department of Planning and Infrastructure GPO Box 39 Sydney 2001

Friday 16 November 2012

Submission of Objection

Cobbora Coal Project (Application No: 10_0001)

The Inland Rivers Network ("IRN") is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. It has been advocating for the conservation of rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Friends of the Earth; Central West Environment Council; the Coast and Wetlands Society and the Wilderness Society, Sydney.

IRN is lodging an objection to the Cobbora coal mine project because it will have a long-term impact on water sources in the Upper Macquarie catchment area of the Murray Darling Basin and could impact on availability of environmental water allocation to the Maquarie Marshes.

The Cobbora project will impact on groundwater systems and surface water flows within the endangered Lowland Darling River aquatic ecological community.

INLAND RIVERS NETWORK Working for river and wetland health since 1991 Level 2, 5 Wilson St Newtown 2042 PO Box 1132 Newtown 2042 The large opencut mine proposal plans to have three pits mined simultaneously, causing drawdown in the Gunnedah-Oxley Basin groundwater source, the Talbragar River alluvium and the alluvium associated with Laheys Creek and Sandy Creek.

The groundwater assessment has identified that at least two deep permanent pools in the creek systems will be impacted through loss of base flows.

The aquatic ecology survey has recorded the threatened Freshwater Catfish (*Tandanus tandanus*) in a number of these sites that will be impacted by the project through loss of both low flows and base flows. The project may be responsible for the local extinction of this species.

The impacts of the project on aquatic ecology, particularly during extended period of drought, will be significant. The loss of deep pools providing drought refugia in the ephemeral streams, the degradation of riparian vegetation and stress on other groundwater dependent ecosystems has not been adequately addressed.

The groundwater drawdown predicted through project impact assessment modeling is significant. It is predicted that residual drawdown will remain within about 2km of the mining area B void lake and that a new equilibrium will be reached after 50 years. Also that it will take at least 20 years after mining for groundwater levels to have recovered in other parts of the area of impact

The project will also impact on surface flow across the catchment of the creek systems and flows to the Talbragar River. These ephemeral streams are likely to be degraded through prolonged drought sequences caused by loss of surface flows combined with loss of base flows.

IRN also has concerns about the very large volume of water use needed in the Cobbora mine project. The impacts on other water users and the environment has not been adequately assessed.

The assessment identifies that the total peak annual water allocation for the proposal will be about 5,100 ML. This includes 3,310 ML from the Cudgegong River, 280 ML from the Talbragar River and 1,495 ML from the Gunnedah-Oxley Basin groundwater source.

Not all licenses have been purchased to mitigate the aquifer interference to the alluvium and porous rock groundwater systems. Local landholders also have concerns about loss of domestic bore water supply.

There is particular concern about the impacts of the approved transfer of high security licences from the lower Macquarie, which is supplied from Burrendong Dam, into the Cudgegong catchment with a much smaller annual average inflow.

The Cobbora project may increase the extraction of high flows from tributaries below Windamere Dam in the Cudgegong catchment. IRN presumes this is the reason for the proposed construction of a large raw water dam near the mining operations.

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These high flows provide water that has not been included in water allocations from the combined storage of Burrendong and Windamere Dams. In the millennium drought there were a number of times that high flows from these tributaries were the only source of inflow into Burrendong Dam.

The environmental water allocations available to the internationally significant Ramsar listed Macquarie Marshes rely on dam inflows, as do all other downstream water licence holders.

The proposed extraction of up to 3,310 ML per year from either releases from Windaamere Dam or downstream tributary flows may have a significant impact on environmental water availability during the next prolonged drought.

IRN is very concerned that the NSW Office of Water has approved these large high security water licences without assessing their impact with a new drought of record model.

The predicted water demand for the Cobbora mine project of up to 3,700 ML per year to wash coal and suppress dust is a very large water requirement in a low rainfall area.

IRN recommends that the Cobbora coal project not be approved because of the likely significant impact on water sources, their dependent ecology and other water users in the Macquarie River catchment area including the Macquarie Marshes.

Yours sincerely

As Rem.

Anne Reeves, BSc OAM Hon. Secretary