

Submission for
Part 3A Modification 4 – Invincible Mine Extension (07_0127 MOD 4)
And
Part 3A Modification 2 – Cullen Valley Mine Extension (DA [200-5-2003](#) MOD 2)

I object to the proposed modifications to the Invincible and Cullen Valley coal mines for the reasons listed Below.

- The original DA was rejected in 2013 after a lengthy process. Even though the current modification area is smaller all the reasons for rejection still stand.
- The proposal will totally destroy 150 ha of pristine native forest, and is highly likely to damage another 165 ha above the highwall mining. But, of course this is only the beginning. This modification is just the original one in disguise. Coalpac has just changed the original area to 2 separate more modest Modifications. If this is approved the mining will commence and they will put in another Modification to do more etc.
- The PAC recommended a 300m buffer from any pagoda formations. Coalpac has ignored this recommendation. In the Cullen Valley area they are proposing to highwall directly under a large area of pagodas. If this goes ahead it will be significantly threatening internationally recognized pagodas.
- Coalpac has an appalling record of noncompliance and lack of rehabilitating areas destroyed by previous mining activities. E.g. PA 05_0065. They are now saying that rehabilitation of existing open cut areas are dependent on this current DA Mod being approved. The Company must be held to account for obligations under previous approvals.
- The rehabilitation that has been carried out in the area is totally inadequate and will never come close to replacing the unique biodiversity that has been lost. Some of the rehabilitation looks 'green' from a distance but when you get close it is devoid of ground cover because the soil is dead.
- The DOPI should not allow a company in administration to carry out any kind of mining in NSW, especially open cut which needs a lot of resources for ongoing rehabilitation.
- The coal in the proposal area is poor quality and it is not worth destroying Forest that can never be replaced. The power stations in the Lithgow area have been supplied good quality coal for the last 20 years by local underground mines and there is no reason that this cannot continue into the future.
- There is a conflict of interest when the owners of a power station are waiting for a DA Mod approval, after which they will buy the mining Company. (reported recently in the media).
- Ben Bullen State Forest is part of the Gardens of Stone and belongs to the public. It should be protected for the future by reserving it under the NPWS Act as an SCA.
- I have walked extensively in both the Cullen Valley and Invincible areas, spoken friends and colleagues, including NSW Departmental Officers who have local area knowledge and expertise in identifying vegetation. It is obvious that Coalpac's vegetation mapping is inadequate to the point of being incompetent. Before any approval is given there should be detailed vegetation mapping carried out by qualified, independent experts.
- If this open cut mine goes ahead it will have significant detrimental health and lifestyle effects on residents of Cullen Bullen, many of whom oppose this proposal.

I declare that I have not made any donations to political parties in the last year.