

*“Reclaiming our Valley”*

Hunter Communities Network

---

PO Box 14 Singleton 2330

Elle Donnelley  
Major Projects Assessment  
Department of Planning and Environment  
PO Box 39  
Sydney NSW 2001

Monday 9 June 2014

### **Submission of Objection**

**Integra Mine Complex Modification 4**  
**Biodiversity Offset Strategy**  
(08\_0101 MOD 4 and 08\_0102 MOD 4)

Dear Ms Donnelley,

The Hunter Communities Network (HCN) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

HCN welcomes the opportunity to comment on the proposed modification of the Integra Mining Complex Biodiversity Offset Strategy and notes that this is the fourth modification to the conditions of approval granted in 2008 relating to the management of biodiversity impacts of the mine.

HCN also wishes to note that the Integra Mining Complex has recently ceased to produce any coal. The mine has approval to extract coal from two open cut pits until 2022 and an underground mine until 2035.

The public is receiving no benefit from this resource in the form of wages, taxes, royalties and flow on jobs while the mine is in care and maintenance. The economic arguments made to support this mining operation obviously do not hold up in the current market.

HCN is concerned that the justification for Modification 4 is to prevent the sterilization of \$6.2 billion of coal resource. The application assessment report does not provide any details about the

volume, quality or the economic availability of the resource or the calculation used to arrive at the claimed value.

HCN maintains that the company had known that coal was under the onsite biodiversity offset areas when agreeing to the original conditions of consent in 2008. The issue of ongoing exploration drilling within approved biodiversity offset areas is a major failure of regulatory powers in the NSW planning system.

HCN considers that the management of the Integra Mining Complex is a good example of the inadequacy of conditions of approval granted by the Department of Planning and Environment for major project development with significant biodiversity and social impacts.

The original condition to secure the biodiversity offset areas by December 2011 was not met. Instead the mine was given an extension of time to March 2013 and then to September 2013. This was then further extended to September 2014.

The submission from Office of Environment and Heritage for Modification 2 states that the agency does not support the extension of time or the mining of offset areas. The Department of Planning then approved an extension of time in Modification 3 before assessing Modification 2.

HCN is concerned that the assessment report for the Modification 4 application has a number of additional deficiencies in the information provided. These include:

1. No reference to the cumulative impacts of mining operations on the two endangered ecological communities approved to be destroyed by the project - Central Hunter Ironbark-Spotted Gum-Grey Box Forest EEC and Swamp Oak Floodplain Forest EEC
2. No reference to the cumulative loss of threatened species habitat in the Central Hunter
3. No reference to the biodiversity values within the biodiversity offset areas proposed to be removed from the offset strategy (the entire western and supplementary biodiversity offset areas, part of northern, southern and Martins Creek biodiversity offset areas)
4. No indication of the area of the additional significant resource

HCN objects to the claim that there has been extensive stakeholder engagement on matters relating to Integra Mine Complex and the ongoing modification of conditions of approval. There has been no attempt to contact regional groups such as HCN who have a direct interest in the management of impacts of coal mining in the Hunter valley.

The community information sessions conducted in Singleton were only advertised through the company website and a newsletter distributed to immediate neighbours of the mine.

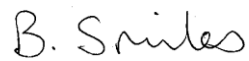
The impacts of this mining operation have regional significance that is of interest to the broader community.

The Modification 4 proposal will result in a possible further loss of 11 ha of Central Hunter Ironbark-Spotted Gum-Grey Box Forest EEC and 3.7 ha of Swamp Oak Floodplain Forest EEC.

HCN is concerned that all the management requirements identified in the Biodiversity Offset Management Plan may not be able to be delivered now that the operation has closed down and the mine site is under care and maintenance.

HCN would appreciate a response to this submission that outlines what commitments for biodiversity offset area management and rehabilitation of the mine site will be undertaken while the mine is not operating, who will be responsible for carrying out this work and who within the Department of Planning and Environment will be regulating these conditions of approval.

Yours sincerely

A handwritten signature in black ink that reads "B. Smiles". The signature is written in a cursive, flowing style.

Bev Smiles  
Convenor  
Hunter Communities Network