

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

Att: Ellen Donelly

7 June 2014

Submission of Objection

Integra Mine Complex Modification 4- Biodiversity Offset Strategy
08_0101 MOD 4 and 08_0102 MOD 4

Please accept this submission as a preliminary outline of the key objections from NCC to the proposed modification to the Biodiversity Offset Strategy for the Integra Mine Complex.

NCC notes that the mine has current approvals to operate until 2022 for the northern and southern open cuts and until 2035 for the underground project.

NCC also notes that the mine has recently gone into care and maintenance because it is an uneconomical project. This has resulted in the loss of 500 jobs in the Hunter region. NCC questions the statement that \$6.2 billion worth of coal resource is currently sterilized by the approved Biodiversity Offset Strategy. There is no indication within the assessment documents about the calculations arriving at this figure.

NCC primarily objects to the proposed modification because of the following reasons. More detailed information will be provided in an additional submission:

1. The proposal to remove the supplementary and a significant section of the northern onsite offset areas will impact on the protection of a large meander in Glennies Creek.
2. The loss of the western onsite area and a significant section of the Martins Creek offset area reduces the connectivity design of the current approved Biodiversity Offset Strategy.
3. The proposed new offsets, 30kms away from the impacts of the mine, do not contain either of the endangered ecological communities (EEC) approved to be destroyed. These are Central Hunter Ironbark-Spotted Gum-Grey Box Forest EEC and Swamp Oak Floodplain Forest EEC.
4. The proposal does not identify the cumulative loss of either of these EECs on the floor of the Hunter valley due to mining operations.
5. The proposal also does not identify the cumulative loss of threatened species habitat on the floor of the Hunter valley due to mining operations.

6. Issues raised by the Office of Environment and Heritage in October 2012 during the assessment of Modification 2, in relation to the biodiversity offset arrangements for the Integra Mine Complex, have been ignored by the Department of Planning and Infrastructure.

NCC contends that Modification 4 should not be approved because the proponent has been in breach of conditions relating to the Biodiversity Offset Policy, the operation is unviable and the projected value of resource beneath existing approved offset areas has not been clearly calculated and appears to be vastly overstated.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Smolski', with a stylized flourish at the end.

Katherine Smolski

Campaigns Director