



Hunter Environment Lobby Inc.

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Major Project Assessment
Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

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Modification to the Wilpinjong Coal Mine Project (05_0021 MOD 5)

Submission of Objection

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for more than fifteen years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL wishes to submit an objection to the proposed fifth modification to the Wilpinjong Coal Mine (the proposal) because there has been no valid justification given in the Environmental Assessment (EA) lodged with the Department of Planning and Infrastructure (DPI) for an increased environmental impact footprint in the operation.

The overview of the modification provided in the Main Report¹ provides no clear justification for the need for current operations to disturb an additional 70 hectares to extract a further 3 million tonnes (Mt) of ROM coal over the life of the mine.

The EA indicates that there will be no change to the approved rates of production of 15 Mtpa ROM coal or 12.5 Mtpa product coal. Also the mining fleet and operational workforce will remain unchanged.

The reason offered within the EA for the need for an additional 3Mt of ROM coal is that by 2018 production levels would fall below current approval maximum levels. This is a clear indication that previous approvals have been based on inaccurate information.

¹ Resources Strategies July 2013 *Wilpinjong Coal Mine Modification Environmental Assessment* Main Report p1

HEL objects to the fact that the EA is not transparent about the reasons for the proposal and does not support the socio-economic analysis that a \$28m benefit will be realised.

HEL also wishes to raise other issues relating to poor environmental assessment for the current operations at Wilpinjong Mine. The original EA approved in 2006 had predicted that there would be ‘*a moderate susceptibility*’² to spontaneous combustion. This form of pollution has been an ongoing and poorly managed problem with the Wilpinjong Mine since operations began.

The noise impact predictions in the original EA have also proven to be highly inaccurate and have caused a severe level of stress to the local community.

The prediction that the mine would manage all water onsite during wet periods has also proven to be incorrect. HEL has not been given any assurances in the current proposal that the environmental assessment and predictions of impact are any better than the past guess work accepted by DPI.

HEL objects to the proposal destroying previously approved regeneration areas. The EA is not clear about where this is happening. In particular, Figure 11³ does not seem to identify the area of regeneration to be destroyed.

HEL does not support ongoing change and expansion to the operations of Wilpinjong Mine because the current impacts are much greater than predicted and the cumulative impact of the proposal have not been identified or assessed.

HEL does not consider that there has been any justification given for the need to:

- Disturb an additional 52 ha of native vegetation including woodland and grassland species and 10.6 ha of critically endangered Grassy Box Gum Woodland
- Destroy the habitat of 116 native species including 9 threatened fauna species
- Threaten a further 17 Aboriginal cultural heritage sites
- Produce an additional 236, 036, 811 t of greenhouse gas emissions
- Mine through 20 ha of the Regeneration Areas in Pit 2 and Pit 3 that had been previously set aside for linking woodland regeneration adjacent to the open cut mine
- An increase in annual waste rock production of 5.3 million bank cubic metres
- Further disturb the amenity of the remaining community in the Wollar area

HEL is concerned that DPI issued no requirements from the Director General against which to judge the adequacy of the proposal.

² Resource Strategies May 2005 *Wilpinjong Coal Project Environmental Impact Statement* Main Report p 4-51

³ Resources Strategies July 2013 *Wilpinjong Coal Mine Modification Environmental Assessment* Main Report p 30

HEL is also concerned that the exhibition period for comment on the proposal was only three weeks. There is no consistency from DPI in the time given to the community to comment on the various modifications to coal projects in the Hunter region.

There is no valid economic justification provided for the proposal. The cumulative social impacts of the Wilpinjong Mine have been ignored.

HEL strongly objects to the proposal gaining approval.

Yours sincerely

A handwritten signature in cursive script that reads "Jan Davis". The signature is written in dark ink and is positioned above the printed name and title.

Jan Davis
President