



Ringwood Rd
Wollar NSW 2850

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

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Monday 9 September 2013

Dear Sir,

**Submission of Objection
Modification to the Wilpinjong Coal Mine Project (05_0021 MOD 5)**

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC objects to the proposed expansion of the Wilpinjong Coal Mine in the Mid Western Regional local government area because of the cumulative impacts on the environment and biodiversity caused by coal mining in the region.

CWEC is of the strong opinion that these impacts are not being adequately monitored or regulated and that the capacity of Government agencies, particularly the Environment Protection Agency (EPA), to manage the ongoing impacts of current operations is limited.

CWEC does not support the proposal to disturb a further 70 ha land for the operation of the Wilpinjong Mine, including 20 ha identified for regeneration to offset the loss of native vegetation.

The area of regeneration proposed to be destroyed was to form part of a vegetation corridor in the central area of the mine impact. The proposed

replacement regeneration area, adjacent to Goulburn River National Park, does not provide the original intent to provide a wildlife corridor to the south of mining operations.

CWEC does not support the proposal to destroy a further 52 ha native vegetation on the mine site, including an additional 10.6 ha of the critically endangered ecological community (CEEC), White Box-Yellow Box-Blakely's Red Gum Woodland and derived native grasses.

There is no discussion in the Environmental Assessment of the cumulative impact of this loss, additional to the original approval to destroy 47 ha of the CEEC.

CWEC does not consider that the biodiversity offset package approved for the original consent for Wilpinjong Mine was adequate. The proposed offset for this cumulative loss, a ratio of only 4:1, is also inadequate.

The biodiversity impact of the permanent removal of nearly 60 ha of CEEC from the Wilpinjong Mine site has not been adequately considered or mitigated.

CWEC is concerned that the Environmental Assessment identifies that there is no suitable regional vegetation classification and mapping available for the Wilpinjong Mine area or the biodiversity offsets. The fact that vegetation mapping units have been developed by the consultant who carried out the initial survey in 2005 is of great concern.

CWEC is concerned that 116 native fauna species were recorded in the proposed extension area, including 9 threatened species, as this indicates the important habitat values of the area proposed to be destroyed.

These include the following vulnerable species listed for protection under the NSW *Threatened Species Act 1995*: Painted Honeyeater (*Grantiella picta*), Brown Treecreeper (*Climacteris picumnus victoriae*), Speckled Warbler (*Chthonicola sagittata*), Grey-crowned Babbler (*Pomatostomus temporalis*), Diamond Firetail (*Stagonopleura guttata*), Eastern Bentwing-bat (*Miniopterus schreibersii oceanensis*), Eastern False Pipistrelle (*Falsistrellis tasmaniensis*) and Eastern Cave Bat (*Vespadelus troughtoni*)

The area of impact also has records of species listed for protection under the federal *Environment Protection and Biodiversity Conservation Act 1999* including the endangered Regent Honeyeater (*Anthochaera phrygia*) and Swift Parrot (*Lathamus discolor*) and the vulnerable Large-eared Pied Bat (*Chalinolobus dwyeri*) recorded during the assessment.

Many of these same threatened species have been recorded in areas of impact of the Moolarben Mine and Ulan Mine projects. The ongoing loss of

habitat for species listed for protection under state and federal environmental law within this region has not been considered.

The pressure on existing populations to find alternative habitat has not been assessed and will not be solved through the proposed biodiversity offset packages.


The ongoing applications in the region to mine into areas previously identified for biodiversity offsets and mitigation are not being adequately assessed for cumulative impact.

The cumulative impacts on other environmental considerations including ground and surface water, air quality, spontaneous combustion, greenhouse gas emissions and noise have not been adequately assessed in the Wilpinjong modification 5 application.

CWEC objects to this proposal because the existing impacts of the Wilpinjong Mine are greater than predicted in the original environmental impact assessment. The mine has had a range of significant impacts on the environment and local community.

There has been no adequate justification to access a further 3 million tonnes of coal from the mine.

CWEC recommends that this development application not be approved.

A handwritten signature in black ink, reading "Cilla M. Kinross". The signature is written in a cursive, flowing style. The letters are dark and clear against the white background.

Cilla M. Kinross

President, Central West Environment Council