

Major Planning Assessments  
Department of Planning and Infrastructure  
GPO Box 39  
Sydney 2001

9 September 2013

Dear Sir/Madam,

**Submission of Objection – Wilpinjong Coal Mine Project (05\_0021 MOD 5)**

The Nature Conservation Council of New South Wales (NCC) welcomes the opportunity to comment on the Wilpinjong Coal Mine Project. NCC is the peak environment body for NSW, representing over 100 organizations across the state. We have long-standing experience in state environmental assessment and planning and are extremely concerned with this proposal to further develop the Wilpinjong Coal Mine Project within the Mid-Western Regional Council (MWRC) Local Government Area, in central western NSW.

These Modifications to the Wilpinjong Coal Mine Project will worsen air quality, health and socio-economic impacts for the community. The proponents have done little to adequately address issues of water quality, flora, fauna, aquatic ecosystems and Aboriginal heritage. There will also still be significant threats to local ground, surface and catchment waters putting the region's drinking water at risk.

**NCC objects to this development application on the following grounds:**

**Negative socio-economic impacts**

Coal mines at Ulan, Moolarben and Wilpinjong are responsible for the demise of the town of Wollar. Consequently there is a concern that the expansion of the Wilpinjong Coal Mine Project will not benefit local communities such as Ulan and Wollar, but will negatively impact their quality of life for these communities. The proponents for the Wilpinjong Coal Mine have not adequately considered the Wollar community, which has resulted in ongoing loss of neighbours and social support system, stranded assets (unable to sell properties), ongoing noise, dust and pollution from spontaneous combustion.

**Environment and climate change**

The expansion will mine an additional 3 million tonnes of very poor quality coal. This proposed 'modification' is a major extension to the current approved Wilpinjong Coal Mine. The proposal

to extend the existing mine footprint by 70 hectares will disturb an additional 52 hectares and create 5.3 million cubic metres (Mbcm) of waste rock.

The mine will cause long-term environmental impacts due to the increased emission of greenhouse gases from the mining and use of the coal from the mine contributing to anthropogenic climate change and ocean acidification.

The modifications to the mine are not consistent with the principles of ecologically sustainable development that decision-making processes should integrate both long- and short-term economic, environmental, social and equity considerations.

### **Blasting frequency**

Increased blasting frequency would cause significant adverse effects on the local community. Any further increase in Maximum Instantaneous Charge (MIC) would cause associated amenity (noise, dust and vibration) and public health impacts. Furthermore the MWRC has already raised concerns that the operators are exceeding noise limits, so any increase in MIC would be unacceptable.

### **Train movements**

Up to 20 train movements per day will result from the expansion. Any further increase in train movements would cause associated amenity (noise, dust and vibration) and public health impacts. All coal trains should be covered as the lowest mitigation measure to avoid increased impacts on public health from coal dust.

### **Invasive species**

The Wilpinjong Coal Mine Rehabilitation Management Plan (WCPL, 2011) stipulates measures for weed control in the currently approved operations. Due to poor mine rehabilitation practice, invasive species such as Rhodes Grass have been introduced which will destroy a 20 hectare area identified for regeneration in original conditions.

### **Biodiversity and threatened species**

Destroyed ecosystems cannot be easily reproduced with restoration efforts. Established habitat takes decades to re-establish and therefore gains from restoration do not equal losses from land clearing due to the time lag for ecosystems to recover. As a result of extending the open-cut mining footprint by 70 hectares, 52 hectares of woodland and grasslands including 10.6 hectares of federally-listed critically endangered ecological community White box, Yellow Box, Blakely's Red Gum Grassy Woodland will be destroyed (Appendix E, Pg. 53).

The proposed modification will have a significant adverse impact on native animals, with nine threatened species recorded in the modification area – 5 birds (the Little Eagle, Brown treecreeper, Diamond Firetail, Grey-crowned Babbler, Speckled Warbler) and 4 bats (Eastern Bentwing- bat, Eastern Cave Bat, Large-eared Pied Bat and Eastern False Pipistrelle) (Appendix F, Pg. 22).

The key threats to these species include land clearing, destruction of wildlife corridors that link ecological communities, loss of habitat trees, changes in habitat due to subsidence, alteration of

water flow and contamination of land and water. All of these threats are possible effects of this project.

### **Aboriginal cultural heritage**

The *Aboriginal Cultural Heritage Assessment* of the mine site indicted former Aboriginal use of the landscape. Aboriginal relic sites would therefore be directly impacted by the mine expansion with 17 Aboriginal cultural heritage sites, scar trees and areas of cultural association affected.

### **Cumulative environmental and social impacts**

The cumulative effects of the Moolarben, Ulan and Wilpinjong mines within 10 kilometres of Wollar are likely to cause serious environmental and social problems now and into the future. Whilst the mine is in operation, traffic, traffic noise and public safety will be an ongoing problem. However, the most serious long-term issue is mine leachate leaking into water supplies from cracks in the strata caused by mining activities. Additionally extensive surface disturbance, open-cut pits and overburden emplacements represent a significant threat to water quality from sediment and salinity partially after heavy rain to the community of Wollar.

### **Conclusion**

This proposal has the potential to create long-term damage to the water, impact threatened species, and the health of the surrounding region. This proposal does not benefit the Mid-Western Regional LGA, with the coal being mined mainly for dirty coal-fired power generation and export. The proposed modifications to the mine will add to environmental impacts from the mine and other mines in the area which create cumulative effects well beyond the effects of a single mine approval.

After examining the Environmental Assessment for the mine expansion, NCC is not satisfied that the impacts of the proposal can be managed and mitigated to ensure an acceptable level of environmental performance. Due to threats to water, threatened species and the community we urge the NSW government to reject the proposal.

Yours sincerely,

Katherine Smolski  
Campaigns Director