

Re : Boggabri mine modification 8

Established in 1957, NPANSW is a non-government, not-for-profit conservation organisation dedicated to protecting nature through community action. We aim to provide opportunities for people to experience and learn about nature through our program of bushwalks, field surveys, events and bush regeneration projects. We advocate for nature by input into public land management processes, and campaign for a world-class reserve system.

Armidale Branch was established in 1974 with membership throughout NW NSW, some of whom are graziers and pastoralists and who are concerned about water quality and supply as well as biodiversity and quality of life.

The Armidale Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on the Boggabri modification 8.

We object to the project over concern for water resources, biodiversity, climate impact and social impacts as the proponent of the project has not provided sufficient information to allay concerns.

- Water – we are aware from some of our members on the impact from coal mines on farm water sources around Narrabri including Maules Creek area. The Boggabri mine has multiply breached its water development consents and surface water plan as the Department of Planning, Industry and Environment would be aware.
- The cumulative impact on local groundwater has far exceeded that of what was originally anticipated and the impacts of the proposal will cause further withdrawal of water that is available to local farming operations. This will also impact on the Namoi River. The proponent does not adequately address the impacts of water drawdown in dry and drought conditions.
- There is considerable distress amongst the farming community caused by anxiety over water resources (especially during increased dry periods) and the resultant social impact of large scale mining developments. Noise, dust, light pollution from 24hour per day operations have considerable impact on the quality of life of neighbouring farming families. The NSW Government must take these concerns of unacceptable risks and impacts into consideration
- Impact on greenhouse gas emissions is unacceptable – these have increased according to Boggabri Coal assessment in the Annual Review and yet the claims in the Modification Report contradicts this. The emissions will not be equivalent to those emitted in current

- operations but will increase at least threefold if the ‘modification’ project is permitted to proceed for six years.
- Biodiversity – it is noted that Boggabri ‘modification’ will impact on two native vegetation communities, including 11.2 ha of Pilliga Box – Poplar Box White Cypress Pine grassy open forest, and 2.8 ha of White Box – White Cypress Pine grassy woodland, which is listed as an Endangered Ecological Community (EEC) under the Threatened Species Conservation Act 1995 (TSC Act) and that 27 threatened species listed under the TSC Act were considered to have the potential to occur. Further that Boggabri mine proponents consider that

“The Box Gum Woodland EEC is reported to be in poor to moderate condition, while the majority of the Pilliga Box community is in moderate condition and dominated by native species. The majority of the disturbance (37.4 ha including 13.3 ha of native vegetation) would occur in an existing offset area for the Boggabri Coal Project, known as the Namoi River Offset. The Namoi River Offset area is approximately 2,469 ha in size and contributes to offsetting requirements for impacts to the Box Gum Woodland EEC.” They claim that “No threatened flora or fauna species were recorded in the modification areas, although Boggabri Coal conducted significance assessments for each of the threatened flora and fauna species, and vegetation communities, and concluded that the modification would be unlikely to result in any significant additional impacts to those assessed and approved under the original project application.”

- Landscape context There has actually been considerable impact on local fauna and flora with the expansion of the open cut and long wall coal mines in the Narrabri area, not only from extensive loss of habitat but also due to 24 hour per day brightly lit operations impacting on nocturnal animals and birds. This area includes species such as the critically endangered Box-Gum Woodland with some mature trees providing crucial nesting hollows. Nature cannot be compartmentalised – conditions of air, water, soil form an intricate web of connectivity that provide homes, in often very localised fashion, for invertebrates, reptiles, amphibians, mammals and birds.
- **Any loss of Endangered Ecological Communities such as Poplar Box White Cypress Pine grassy open forest, White Box – White Cypress Pine grassy woodland, regardless of hectare area is unacceptable. Any loss of Box Gum Woodland EEC or Pilliga Box, regardless of perceived condition of the vegetation is unacceptable**
- Any loss of habitat decreases the sustainability of native flora and fauna and in some instances makes for critical survival of some species. Therefore offsets do not compensate for loss of areas of Endangered Ecological Communities, areas that are vitally important.

- Fragmentation of the landscape ecology is also to be avoided. Increased periods of drought and fire further add to the depletion of native Australian species. So even if they actually exist, exact “replicas” of a specific EEC do not compensate for these losses as Australia cannot afford to lose any of these unique ecological areas.
- In addition, offsets are simply not able to duplicate ecological habitats in time to compensate for loss of habitat from clearing and mine operations. It takes a very long time for habitats to develop and for trees to mature to create hollows (sometimes exceeding 100 years) for birds and some mammals for example Corben’s long-eared bat, *Nyctophilus corbeni* and the Yellow-bellied Sheath tailed bat, *Saccolaimus flaviventris* which rely on hollows for roosting
- Not only have the existing mines fragmented Leard State Forest and surrounding areas but the edge effects, created by habitat fragmentation, can change the micro-climate within forested areas that result in a loss of species diversity, a loss of genetic diversity and a reduction in an ecosystem’s ability to deal with climate change, disease, species invasions and other human impacts.
- We do not have confidence in appraisal by Planning and Infrastructure that the biodiversity impacts of the proposed modification can be mitigated by offsets

In conclusion :

The issues of concern in our submission create such considerable and serious cumulative impacts that we urgently request the NSW Government to regard this proposal as being far too large for a ‘modification’ and therefore the applicant’s ‘modification’ needs to be withdrawn or rejected by the NSW Government.

There appears to be a loophole whereby the four mines in the area have expanded considerably by way of ‘modifications’ impacting severely on natural and farming landscapes, water resources and have caused serious social impacts.

To meet the principles and responsibilities of Ecological Sustainable Development regarding water, biodiversity, climate impact and social impacts we request that the NSW Government directs the Boggabri mine proponents to re-submit their proposal as a new independent application, or for the NSW Government to reject totally the extension ‘modification’ project.

Yours sincerely

Lynne Hosking
President
Armidale Branch NPA
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