

Mining and Industry Projects,  
NSW Department of Planning & Infrastructure,  
GPO Box 39,  
Sydney NSW 2001

Dear Sir/Madam,

**Part 3A Modification 4 – Invincible Mine Extension (07\_0127 MOD 4) and  
Part 3A Modification 2 – Cullen Valley Mine Extension (DA 200-5-2003 MOD 2)**

This submission is lodged with regard to the above proposed mining modifications. I take this opportunity to state my objection to both of the applications. The reasons are many, and are detailed below.

The extensions to these existing open cut coal mines, under the original Coalpac Consolidation proposal, were rejected last year by both the Planning Assessment Commission and then by the Department of Planning and Infrastructure. The reasons were many, viz threats of deleterious impacts on the health of the residents of Cullen Bullen, threats to their quality of life from this prolonged and expanded industrial landscape, destruction of the irreplaceable and globally unique 'platy pagoda' landscape and further threats to endangered fauna and flora. All these threats persist. Instead of destroying this valuable conservation area, the forest should be protected from open-cut mining in a state conservation area for nature conservation, recreation and ecotourism.

Recently the state government cast itself in a poor light when it sought to bastardise planning laws in order to promote corporate coal profit ahead of community health and community. Such an action might well have been targeted at the Hunter Valley area and villages like Bulga, but the Coalpac phoenix proposal would ensure that Cullen Bullen suffers a similar fate. The proposal area is less than two kilometres from the village, and dust from this project is considered likely to lead to increased morbidity and mortality in the community from respiratory and cardiovascular disease. Clearly, the noise, truck movements and blasting will also adversely impact on residents. The proposal intends to vastly increase water extraction from underground workings from 26Ml/year to 750Ml/year, but fails to address the ongoing fires underground and in waste heaps. Where 2Ml/day of water pumped from old workings is to be released is not explained.

Such proposals as these often include the fatuous undertaking to monitor environmental impacts. The normal understanding of a monitoring regime includes the presumption that deleterious impacts will be remediated. But it takes extraordinary gullibility to accept that collapsed cliffs, smashed delicate landforms or cracked creek beds can be remediated. But then, the coal mining industry has never been short of effrontery

Surprisingly, even the supposed economic justification for such despoliation is found wanting. The coal is not in demand, being of poor quality, and there are better resources that can provide at least 25 years electricity generation by the two power plants in the Lithgow Region. The claim of increased costs to electricity consumers if the Coalpac proposal does not proceed is a wild exaggeration. Nearby underground mines have provided for local electricity power plants for over 20 years.

My earlier summary comments noted that the proposal will destroy, by open-cut mining, the unique biodiversity, scenery and geological values associated with the platy pagoda landform complex. Botanical studies have demonstrated its outstanding values including a Grassy Box Woodland, a nationally endangered ecological community, many nationally endangered Clandulla geebung shrubs and over 2,000 threatened Capertee Stringybark trees. The Planning Assessment Commission recommendation for independent vegetation study should not have been ignored.

A further aspect of the Planning Assessment Commission recommendations is the minimum 300 metre buffer from the base of the pagoda rock formations and the open-cut area, critical in providing protection for wildlife. If such a buffer were provided, there would be no mine.

The proposal also suggests that remediation of existing environmental damage from the open cut will be enabled through profits from the future project. Is this company admitting that it has no funds to complete its remediation responsibilities for previous damage? If so, that is a damning indictment of the company and the government oversight of the process.

Furthermore, despite Coalpac's claim, experience indicates that ecosystems cannot be replanted on farmland and especially after open-cut mining. I am not aware of any woodland has ever been established to a mature state from post-mine rehabilitation. The biodiversity offsets are inadequate, and cannot replace a Gardens of Stone Stage 2 reserve.

My final objection, from the bigger picture perspective, is that the continued exploitation of fossil fuels, through their combustion, has been demonstrated to pose existential threats humanity as a species, with scientific research concluding that up to 80% of currently demonstrated resources of coal must remain unburnt in order to avoid uncontrolled climate change. These proposed modification applications utterly ignore that consequence, and discount the pressing need to move to a truly sustainable society.

Thank you for the opportunity to lodge this submission.

Yours Faithfully,

Peter Green,  
31 Taronga Way,  
Faulconbridge,  
2776