

Submission of objection to the Vickery Extension Project (SD_7480)

I wish to protest at the unduly short Public Exhibition period. This has prevented me from writing a full submission, given the size, complexity and lack of public awareness of the Vickery Coal mine extension project documents. Like others I am concerned about climate change and the loss of agricultural land and its implications for food security, and would like to have written a more thorough submission. I believe that the relatively short Public Exhibition period has compromised the right of the public to comment on this important State Significant Development. It was incorrect for the Minister for Planning to refuse to extend to 90 days to allow more expert consideration and community comment.

I object to the Vickery Mine Extension Project and ask that approval be refused because of the inadequacy and failure of the EIS to adequately assess likely adverse impacts on the following matters:

- **Landscape connectivity losses - by ignoring and downplaying adverse effects of clearing** scattered trees and loss of patches of remnant vegetation and larger patches such as Vickery State Forest and the extension of the area of surface disturbance of the existing mine
- **Cumulative impacts** - by confining assessment to the footprint of proposed development and ignoring the obvious addition to the impacts on the landscape of adjacent existing and proposed mine developments beyond the Vickery Coal Mine, such as Maules Creek, Tarrawonga and the Santos Coal Seam Gas proposal (850 wells) in the Pilliga forests - all of which seriously deplete the remaining vegetation cover in an over-cleared landscape which cannot tolerate more clearing.
- **Koala habitat** –by inadequately assessing impacts upon the full extent of known suitable habitat within the Approved Mine area. The EIS gives no account of the impact on the Koala of the removal of 500 ha of scattered trees nor is there any attempt to offset this loss, despite the fact that Koalas in this environment can range widely in the landscape and commonly use scattered trees, as shown in several recent studies.
- **Endangered Ecological Communities** have not been adequately assessed, measured or considered in the EIS. The EIS treatment does not comply with the EPBC Act, a powerful reason to withhold consent.
- **The surface water environment** - possible changes to the local hydrology, particularly at the various stream crossings, have not been honestly assessed, with little assessment or measurement of existing conditions. There is a grave risk of adverse effects on the Namoi River and aquifers which would severely and permanently affect the whole region and those depending on it for their livelihoods.
- **Biodiversity offsets**, supposedly including ecological outcomes from mine rehabilitation plantings and the existing mine Biodiversity Offset Strategy are put forward as compensation for any small impacts which may occur, but there is strong evidence that there is no like-for-like vegetation available to replace the vegetation, the threatened ecological communities and koala habitat that will be destroyed. The whole concept of biodiversity offsetting is deeply flawed and cannot meet the objects of the Biodiversity Conservation Act.
- **Whitehaven's claims that all its offsets can be managed successfully need to be treated with caution**, given the flaws and lack of offset finalisation for the Maules Creek Mine. Whitehaven's track record in these matters is not credible and should not be relied upon. **Whitehaven's Biodiversity Offset Plans should not be accepted**