



Integra Mine Complex Modification 4

Response to Submissions

Prepared for Integra Coal Operations Pty Ltd | July 2014



Response to submissions

Integra Coal Operations - Modification 4

Prepared for Integra Coal Operation Pty Ltd | 9 July 2014

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Response to submissions

Final

Report J14028RP1 | Prepared for Integra Coal Operation Pty Ltd | 9 July 2014

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1 Introduction

1.1 Background

The Integra Mine Complex (the Complex) in the Hunter Coalfields is owned and operated by Integra Coal Operations Pty Limited (Integra). The Complex comprises underground and open cut operations which have been active since 1991 under the former Glennies Creek and Camberwell joint ventures.

The Complex operates under a single project approval instrument which combines the project approvals for the Integra Underground (PA 08_0101) and Integra Open Cut (PA 08_0102) (the project approvals), respectively. Integra is seeking approval from the Minister for Planning (or its delegate) for Modification 4 to its project approvals under Section 75W of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) (the modification).

Exploration activities have identified a significant coal resource within the project approval boundary of the Complex, under the approved Northern, Western and Supplementary biodiversity offset areas (BOAs). This resource is valued at approximately \$6.2 Billion. This resource was identified in the environmental assessment (EA) for Modification 2 to the Complex in 2011.

Modification 2 sought an extension to the timeframe for long term security of the biodiversity offset strategy (BOS). The EA prepared for Modification 2 (EMM 2012) highlighted the significance of coal resources identified under the Northern, Western and Supplementary offset areas. The possibility of future alterations to Integra's BOS was identified in the Modification 2 EA, which noted that if alternative offsets were to be sought in the future, changes would be fully assessed and approval would be sought at the relevant time.

Since approval of Modification 2 in February 2013, substantial time and effort has been invested in sourcing and assessing alternative offsets that would provide an improved biodiversity outcome, should the existing strategy be affected.

As stated in Section 2.1.2, Schedule 3 Condition 43 of the project approvals requires the provision of long term security for the BOAs by September 2014. Long term security of the current BOAs, as required under Condition 43, would result in sterilisation of the resource identified under the Northern, Western and Supplementary BOAs, meaning future mining of this resource would be prevented. Sterilisation of this resource would have significant economic impacts for the Complex, such as potential reductions in investment, revenue, export earnings, jobs and substantial regional economic flow-on benefits.

Accordingly, and as foreshadowed in the Modification 2 EA, Integra is seeking to modify its BOS, as described below. The modification proposed will allow for maximum flexibility in terms of the future land uses of the excised BOA areas, subject to obtaining necessary approvals for any such uses.

1.2 Overview of the modification

The modification relates solely to alterations to the approved BOS for the Complex. The requirements for the BOS are prescribed in Condition 41 and 42 of the project approvals. A total of six biodiversity offset areas within the Complex have been established under the BOS for the approved project.

To prevent the sterilisation of previously identified significant coal resources underlying a portion of the BOAs, Integra is seeking to modify the composition of its BOS. The revised BOS complies with the relevant conditions of the project approvals, and provides an improved offset outcome overall. When compared with the approved BOAs, the revised BOS:

- provides similar offset to impact ratios for the vegetation communities impacted by the approved project;
- increases the percentage of native vegetation in the offsets (31 per cent more);
- provides an additional approximately 40 ha of offset area; and
- has the potential to improve continuity of the Wollemi National Park through the inclusion of the Appletree Flat BOA, improving conservation outcomes for this area.

An environmental assessment (EA) was prepared by EMGA Mitchell McLennan Pty Limited (EMM) on behalf of Integra, to accompany the modification application. The EA provided an assessment of the potential impacts related to the proposed modification, and measures that would be implemented to avoid, minimise and/or offset potential impacts.

1.3 Stakeholder engagement

As stated in Chapter 5 of the EA, Integra has an existing comprehensive stakeholder engagement strategy in place for the Complex. For the modification, this was supplemented by engagement activities specifically related to the modification. Consultation regarding the modification included:

- one face to face meeting with the Department of Planning and Environment (DP&E), on 6 March 2014;
- two face to face meetings with the Office of Environment and Heritage (OEH), on 27 March and 5 June 2014 and several follow-up phone conferences;
- three face to face meetings with Singleton Shire Council, on 31 March, 8 April and 19 May 2014;
- presentation of an overview of the proposed modification to Integra's community consultative committee (CCC) on 26 March 2014;
- distribution of a community newsletter on 16 April and 28 April 2014 to local residents;
- two community information sessions, held at the Singleton Library on Wednesday 7 May and Thursday 8 May 2014; and
- discussions with individual community members unable to attend the community information sessions as required.

Stakeholder engagement activities were based on the nature and scale of the proposed modification, which, while not inconsequential, was considered to be relatively minor given no changes to Integra's operations were sought, and no stakeholders would be adversely impacted as a direct result of the modification.

1.4 Purpose of this report

The EA was placed on public exhibition between 23 May 2014 and 9 June 2014. Submissions were received from three government authorities, nine community/special interest groups and 92 individuals. This response to submissions report has been prepared by EMM on behalf of Integra to respond to the matters raised in these submissions.

Integra acknowledges and thanks all stakeholders for taking the time to review the EA, and prepare and submit a response.

2 Summary of submissions

2.1 Introduction

This chapter summarises submissions received on the EA for the proposed modification and the approach adopted to respond to matters raised. All submissions are available on the DP&E's website:

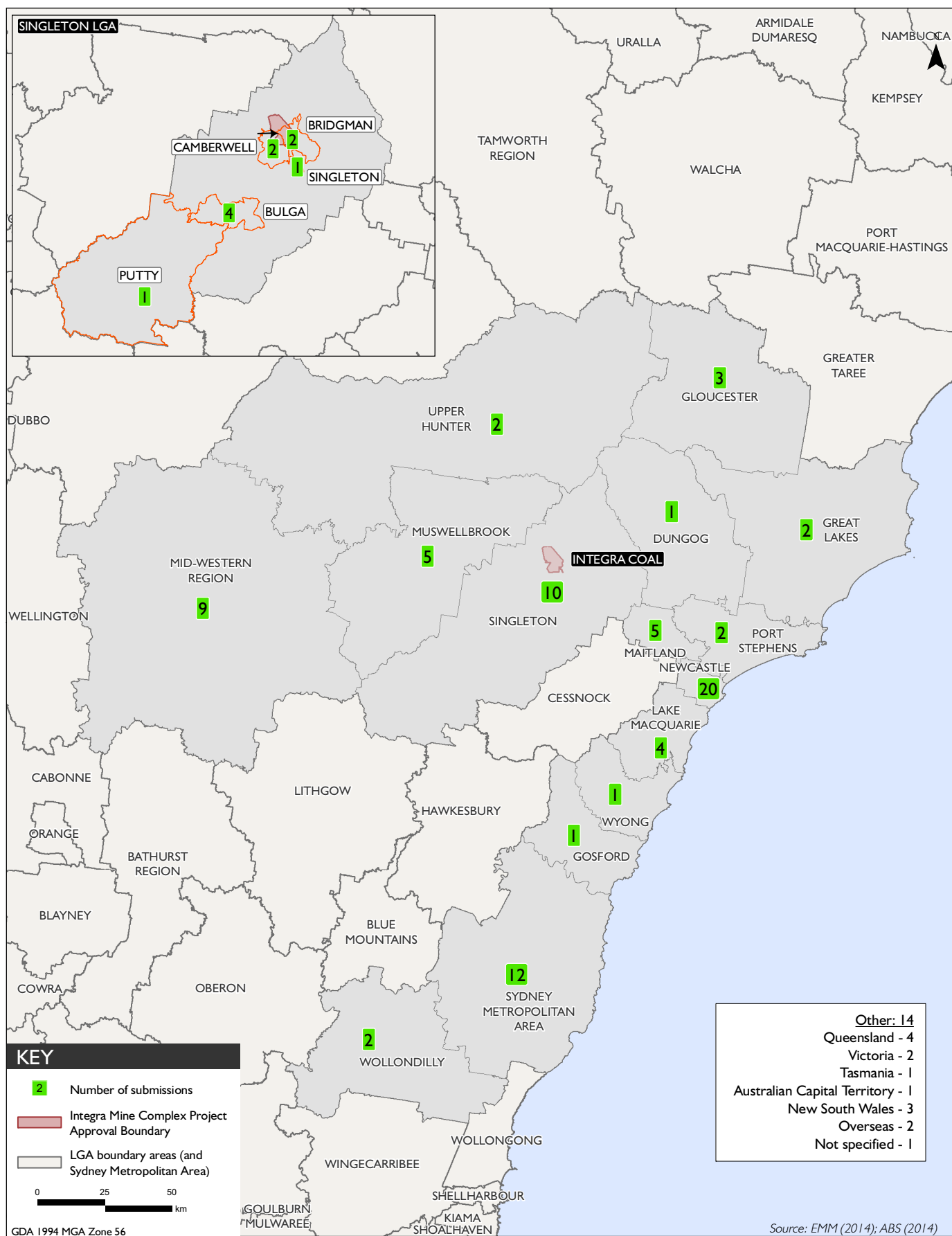
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6539

2.2 Origin of submissions

Submissions were received from the following government authorities, community/special interest groups, and individuals:

- NSW government authorities (three submissions – no objections to the modification):
 - NSW Trade & Investment, Regional Infrastructure & Services, Division of Resources & Energy (DRE);
 - Office of Environment and Heritage (OEH); and
 - Department of Primary Industries (DPI) (NSW Office of Water, Fisheries NSW and Crown Lands).
- Community/special interest groups (nine submissions – one submission in support and eight submissions objecting to the modification):
 - Mining Division of the Construction, Forestry, Mining and Energy Union (CFMEU);
 - Doctors for the Environment Australia Inc;
 - Hunter Communities Network;
 - Hunter Environment Lobby Inc;
 - Ironstone Community Action Group Inc;
 - Lithgow Environmental Group Inc;
 - Lock The Gate Alliance;
 - Nature Conservation Council of NSW; and
 - The Australia Institute.
- Individuals (92 submissions – all submissions objecting to the modification) (see Table 2.1 and Figure 2.1).

The origin (by local government area - LGA) of individual submissions is shown in Table 2.1 and Figure 2.1.



Source: EMM (2014); ABS (2014)

Of note, less than 11 per cent (or 10 submissions) were from individuals residing in the Singleton LGA. The highest number of individual submissions received, 22 per cent (or 20 submissions), were from the Newcastle LGA. The second highest number of submissions received, 13 per cent (or 12 submissions), were from individuals residing in Sydney LGAs and 13 per cent (12 submissions) from overseas/interstate.

Table 2.1 **Origin of individual submissions received**

Local government area ¹	Number of individual submissions	Local government area ¹	Number of individual submissions
Newcastle	20	Port Stephens	2
Sydney Metropolitan area	12	Upper Hunter	2
Singleton	10	Wollondilly	2
Mid Western Regional Council	9	Dungog	1
Maitland	5	Gosford	1
Muswellbrook	5	Wyong	1
Lake Macquarie	4	Other NSW	3
Gloucester	2	Not specified	1
Great Lakes	2	Interstate/overseas	10

Notes: 1. All submissions received from LGAs within the Sydney Metropolitan area have been grouped together.

2.3 Timing of submissions received

Of note is the timing of submissions received. As shown in Figure 2.2, between 23 May and 5 June 2014, a total of three submissions were received on the modification. On 6 June 2014 an article published online by ABC news made the following incorrect statements in reference to the modification:

‘A Hunter Valley mining company is applying to access billions of dollars worth of sterilised coal reserves to secure employment at a time it is laying off 500 workers...

...Integra's Glennies Creek underground and Camberwell open cut mines...are being put into care and maintenance mode. Plans have since been lodged with the Department of Planning for a mine modification, allowing it to access \$6 billion worth of coal that is in an area set aside for an environmental offset.’

As clearly stated in Sections 1.1, 3.4, 4.2.2 and Chapter 9 of the EA, the intention of the modification is to alter the BOS to prevent the sterilisation of previously identified significant coal resources. Consideration of resource significance is consistent with NSW policy and legislation in respect of mining proposals. The modification will *not* enable Integra to access coal resources in approved offset areas, nor will it allow impact or disturbance of any additional areas.

As stated in Section 5.2.2 of the EA, any future applications to mine outside of approved mining areas at the Complex would be subject to a comprehensive, merit-based assessment under the relevant planning approval pathway at the time of any such application.

The majority of individual submissions received, around 82 per cent (or 75 submissions), were a proforma-style email submission. These submissions primarily noted two reasons for submitting an objection: that new offset areas will not protect the endangered Narrow-leaved Ironbark – Spotted Gum – Grey Box Open Forest; and that the Integra Mine Complex has ceased operation and gone into care and maintenance. These submissions were made either on or after 6 June, when the online article was published. The timing of receipt of submissions is illustrated in Figure 2.2.

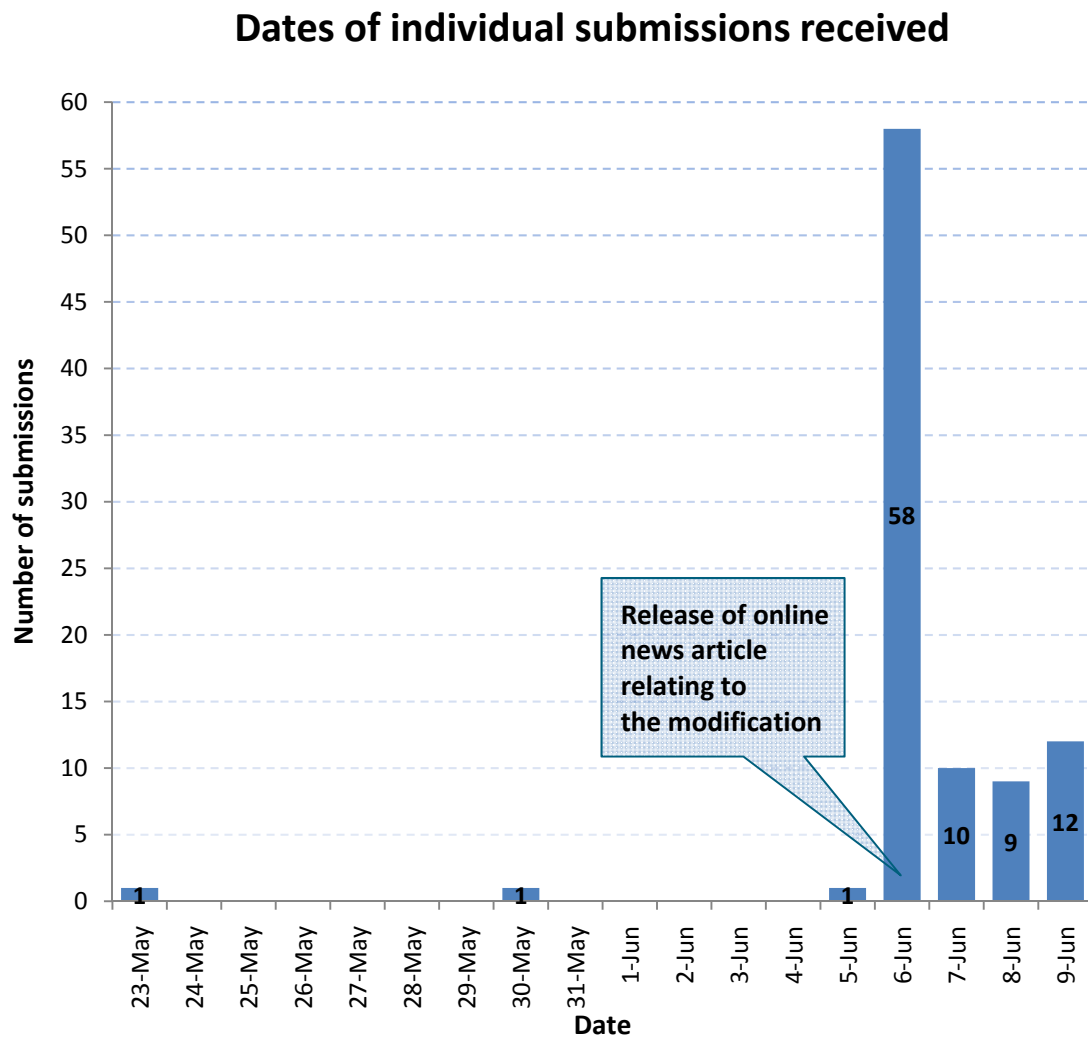


Figure 2.2 **Timing of individual submissions received**

2.4 Response methodology

All submissions received were reviewed and matters raised are summarised into the table presented in Appendix A.

Matters raised were grouped by logical categories and a response to matters raised in these respective categories has been prepared by EMM and Integra. Responses are provided in Chapter 3.

3 Response to key matters raised

3.1 Agency submissions

3.1.1 Overview

Table 3.1 provides the outcome of government agencies review of the modification as per their submissions.

Table 3.1 Outcomes of agency review

Agency	Outcome
NSW Office of Environment and Heritage	No objection. Conditions recommended. Revised BOS satisfies the existing project approval conditions with respect to offset requirements.
Department of Primary Industries (NSW Office of Water, Fisheries NSW and Crown Lands)	No objection
NSW Trade & Investment, Regional Infrastructure & Services, Division of Resources & Energy	No objection

Of the three agency submissions received, none objected to the modification. The DPI and DRE submissions did not raise any matters for consideration in respect of the modification. The OEH submission raised a number of points (see Section 3.1.2 below), however, acknowledged that the revised BOS satisfies the existing project approval conditions with respect to offset requirements, and that it did not object to the revised BOS. The matters raised by OEH are discussed below.

3.1.2 OEH submission

i Revised offsets not meeting credit calculations

Calculations completed by OEH using the contemporary Biobanking Credit Calculator identified that the revised BOS results in an overall *increase* in the ecosystem credits (an additional 756 credits) and species credits (an additional 54 credits) generated, when compared with the approved BOS. The calculations completed by OEH also show that the ecosystem credits generated for the Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest community by the revised BOS exceed the approved BOS (an additional 302 credits). It is noted that this is the same community as the Narrow-leaf Ironbark - Spotted Gum - Forest Red Gum Forest referenced in OEH's submission and both communities meet the description of the Central Hunter Ironbark – Spotted Gum – Grey Box Forest listed as an Endangered Ecological Community (EEC) under the *Threatened Species Conservation Act 1995*. The revised BOS also generates an increase in credits for the Brush-tailed Phascogale (an additional 54 credits), compared to the approved BOS.

OEH also identify a shortfall in ecosystem and species credits generated for *both* the approved BOS and revised BOS, when using the Biobanking Credit Calculator to compare the approved and revised offset packages against the impacts of the approved project. The identified shortfall relates to credits on a 'like for like' basis for:

- Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest;

- Swamp Oak Forest; and
- Brush-tailed Phascogale.

The shortfall, in part, relates to the presence of different vegetation formations at the offsite BOA (Appletree Flat) under the revised BOS, compared to the vegetation formations approved to be impacted under the project approvals at the Complex.

The current BOS was determined to compensate for the approved project's impacts under the policy that was applicable at the time of the approval. While it is acknowledged that the BioBanking Credit Calculator provides a quantitative means of verifying the adequacy of offsets, the approved BOS was not developed based on the BioBanking Assessment Method.

Integra's revised BOS aims to provide an equivalent or improved outcome compared to the approved BOS, rather than satisfying the credits generated by the original development. The EA demonstrates that the revised BOS provides an overall improved outcome compared to the approved BOS.

ii Regeneration of woodland in the onsite offsets

OEH identifies a reliance of the revised BOS on the regeneration of Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest from mapped derived native grassland in the revised onsite BOAs. OEH states that active management, including a combination of planting of seedlings and direct seeding, will be required to ensure that the offset commitments will be met. OEH has recommended conditions of approval relating to this matter (see Section 3.1.3).

As identified in Section 7.5 and 7.6 of the EA, Integra is committed to the active regeneration of 87.2 ha of Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest in the offset areas. Integra's Biodiversity Management Plan (BMP) will be updated to include measures required to achieve this commitment, including detailed performance criteria and a monitoring program. The funds required to implement the BMP will be held in a conservation bond for the project, to ensure that the management outcomes are achieved.

iii Recommended approval conditions

OEH has recommended the following conditions of approval:

- Integra must commit to actively revegetating the entirety of the proposed 87.2 ha of rehabilitation to Narrow-leaved Ironbark – Spotted Gum Forest Red Gum Forest and identify the timeframe in which this will occur;
- an update of the Integra Complex Biodiversity Management Plan (EMP-2016 Biodiversity Management Plan) to include:
 - details of the revised Biodiversity Offset Strategy, including the revised Biodiversity Offset Areas; and
 - definition of the boundaries of the 87.2 ha of Derived Grassland/Native Pasture that are proposed to be rehabilitated.
- a program of works to actively rehabilitate the entirety of the 87.2ha of Derived Grassland/Native Pasture to Narrow-leaved Ironbark - Spotted Gum - Forest Red Gum Forest that includes:

- the proposed methods to rehabilitate the 87.2 ha of Derived Grassland/Native Pasture;
 - the location and staging of active rehabilitation methods;
 - the proposed planting densities and percentage composition of individual species used in rehabilitation;
 - the proposed methods for ensuring success of plantings;
 - the provisions for replacement due to potential mortality; and
 - Schedule 3 Condition 44A be revised to require an audit and resulting report to assess whether rehabilitation works have been substantially commenced within five years of the date of approval of this submitted modification.
- as per Schedule 3 Condition 45, ensure the conservation bond has been updated to reflect the cost of actively rehabilitating the 87.2 ha as part of the proposed modification.

Integra accepts the conditions of approval recommended in OEH's submission.

3.2 Individual and community/special interest group submissions

3.2.1 Ecological matters

i Suitability of the revised offsets

A majority of individual and community/special interest group submissions objecting to the modification identified one or more of the following matters relating to the suitability of the revised BOS as the basis for their submission:

- the ability of the Appletree Flat BOA to compensate for the impacts of the approved project, given it contains different vegetation communities to those identified at the Complex and in the approved BOAs;
- the ability of the Appletree Flat BOA to provide meaningful protection for ecosystems and offset the direct impacts of the approved project given its distance from the Complex; and
- specifically, that the Appletree Flat BOA will not protect the endangered Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest.

As identified in Section 7.3 and 7.4 of the EA, the revised BOS provides for the conservation of equivalent areas of each of the vegetation communities present in the approved BOS in the long term, through the proposed management actions identified in Section 7.5 of the EA. The areas of Narrow-leaf Ironbark – Spotted Gum – Grey Box Open Forest and Swamp Oak Forest in the onsite BOAs under the revised BOS, including the 87.2 ha of derived native grassland to be regenerated, are sufficient and meet the total area of these vegetation communities required by condition 42 of the project approvals.

Condition 41 of the project approvals also requires a minimum area (373 ha) of offsets, which was achieved by onsite BOAs under the approved BOS. In order to reduce the area of onsite BOAs, the identification of another BOA was necessary in order to meet the project approvals' condition. As identified in Section 3.5 of the EA, a review of options, based on ecological criteria, was completed to identify a suitable offset addition that would assist in the improvement of regional conservation values. The Appletree Flat BOA was identified as the preferred option as it would increase regional conservation outcomes, reduce land use conflicts and assist OEH in achieving management objectives. Section 3.5.2 of the EA identified a number of key outcomes that would be achieved by including the Appletree Flat BOA in the revised BOS, including:

- consultation with OEH by the landholder of the Appletree Flat BOA had identified that an important priority was to resolve inholdings within Wollemi National Park to increase conservation outcomes, reduce land use conflicts and management requirements. The Appletree Flat BOA would assist OEH in achieving these objectives;
- OEH had previously indicated that the Appletree Flat BOA would not be required to undergo the reserve referral process, as it is already an inholding. This removes a factor that otherwise may result in lengthy delays in offsetting processes;
- OEH had already provided written in-principle agreement to the addition of this property to the reserve system;
- it contains intact habitats that have already been demonstrated to support threatened species such as Speckled Warbler, Varied Sittella and Turquoise Parrot;

- it contains habitats suitable to provide like-for like outcomes for some threatened species;
- it is within an existing important contiguous area of habitat conservation;
- it forms a vital part of the regional remnant of native vegetation and habitats located between the Upper Hunter Valley and the coast;
- it will result in a net improvement in biodiversity conservation when compared with the approved BOS; and
- it will conserve the site in the long term.

One submission also raised concerns that the current BOS was approved to offset the loss of habitat for nine threatened species listed under the *Threatened Species Conservation Act 1995* (TSC Act), stating that none of these species have been recorded on the proposed Appletree Flat BOA.

Equivalent or improved offset-to-impact ratios for five of the nine threatened fauna species are met by the habitat wholly included in the revised *onsite* BOAs (Brush-tail Phascogale, Brown Treecreeper, Speckled Warbler, Grey-crowned Babbler and Squirrel Glider). As stated in Section 7.3.3 of the EA, of the nine threatened fauna species offset under the approved BOA, one (Speckled Warbler) was identified at the Appletree Flat BOA, and habitat is present for an additional two (Eastern Bent-wing Bat and Squirrel Glider). In addition, the Appletree Flat BOA is likely to provide habitat for at least a further 10 fauna species listed as threatened under the TSC Act for which there are recent nearby records. Two of these were also identified at the Appletree Flat BOA.

ii Biodiversity value of removed BOAs

Several submissions stated that the EA was inadequate as it did not provide enough information about the biodiversity values of the BOAs to be removed from the BOS under the modification. One submission raised concerns that removal of the Supplementary and a significant section of the Northern onsite BOAs will impact on the protection of a large meander in Glennies Creek. Concerns were also raised in one submission that the revised BOS would reduce connectivity for species movement at the Complex.

The values of the approved BOS, including the areas that are proposed to be removed from the BOS under the modification, were included in the Glennies Creek Open Cut Coal Mine Environmental Assessment (Corkery & Co 2007). As these values will not be impacted, it is not considered necessary to present extensive information on these BOAs as part of this modification.

There will be no alteration to the existing biodiversity values or connectivity of the BOAs proposed to be removed from the BOS. These areas will continue to remain in their current form, with the same biodiversity values. Therefore, the modification will not alter the biodiversity values or connectivity for species movement. Any future proposal to impact these areas would be the subject of comprehensive assessment, which would consider the bio-physical, social and economic impacts of any such proposal, their management, mitigation and/or compensation (if required) and would be subject to a merit-based assessment. To consider the impacts of any such application as part of the modification, which would be entirely speculative at this stage, would be inappropriate.

Therefore, given the BOAs proposed to be removed from the BOS will not be physically altered from their current form under the modification, it is not considered necessary to present extensive information on these BOAs as part of this modification. It will also not significantly impact on the protection of Glennies Creek, which, while not protected under the revised BOS, will continue to be protected under relevant NSW and Commonwealth legislative requirements relating to the protection of biodiversity.

iii Cumulative impacts on biodiversity in the Hunter Valley

Several submissions raised the loss of vegetation and threatened ecological communities containing habitat for a range of threatened fauna species, including cumulative losses in the Hunter Valley. The cumulative loss of habitat values and importance of EECs for the suite of threatened species identified in and around the Complex not being assessed in the EA were also raised.

As stated in Section 3.2.1ii above, the modification will not alter the existing biodiversity values of the BOAs proposed to be removed from the BOS. Therefore, there will be no loss of habitat values as a result of the modification.

In addition, it is noted that Integra is participating in the Upper Hunter Strategic Assessment (UHSA), coordinated by the Commonwealth and NSW governments, which provides a framework for the strategic planning and assessment of mining in the Hunter Valley. The UHSA will document biodiversity values within the region as a whole, and enable cumulative impacts to biodiversity to be considered across the assessment area. It will also assist in achieving regional conservation outcomes through the identification of regional priorities for offset investment. While the modification is not included in the assessment, as it will not result in any biodiversity impacts, Integra's participation in the UHSA shows the company's commitment to addressing cumulative impacts in the region.

iv Extension of timeframes for biodiversity offsets

One submission noted that the modification is part of a series of extension of timeframes for the protection of the approved BOAs under the current project approvals, stating that both the extension of timeframes for securing offsets and the mining of offset areas are not supported.

The modification does not seek to either extend the timeframe for securing offsets, or mine the offset areas. Integra has stated its intentions in applications for previous modifications (Modification 2 and 3), being to identify alternative offset areas to enable alteration of the approved BOS and prevent sterilisation of coal reserves underlying portions of the approved BOAs (see Section 1.1). Integra has actively sought to amend the BOS, to avoid being in a potential position in the future where approval for mining of approved offsets is sought.

v The policy of offsetting is generally unsuitable

Several submissions were concerned with the use of offsetting generally in NSW, particularly in relation to the ability to change offsets during the course of a project. One submission also requested that the results from the Senate's enquiry into offsetting be considered.

Offsetting has been accepted by State and Commonwealth environmental approval agencies as an appropriate form of compensation for unavoidable impacts on biodiversity values. The revised BOS meets relevant OEH guidelines and policy including the *Principles for the Use of Biodiversity Offsets in NSW* (OEH 2011) and the seven principles in the *Draft NSW Biodiversity Offsets Policy for Major Projects* (OEH 2014).

The Senate's findings on its enquiry are not yet available.

3.2.2 Capacity of the approved BOAs to act as a buffer between residences and the Complex

Several submissions raised matters relating to the impacts from mining in the offset areas which are proposed to be excluded from the BOS under the modification. Submissions primarily related to impacts

at residences to the north of the Complex, as the approved BOAs, which would be excised from the BOS under the modification, currently provide a buffer between residences and the Complex.

The modification relates solely to alterations of the composition of the BOS for the Complex. The proposed modification does not involve any physical works, including any additional mining, disturbance, physical alterations, vegetation clearing, or the like. As such, there will be no change to the ability of the excised BOAs to act as a buffer between residences and the Complex as a result of the modification.

Any proposed future disturbance in the excised BOAs or any other part of the Complex not currently approved would be subject to a separate application (either modification or new development application) which would be supported by a comprehensive stakeholder engagement program and an environmental impact assessment (EIS). Such an EIS would fully assess biodiversity impacts and propose compensatory measures in accordance with government policy in force at that time.

3.2.3 Resource value

Several submissions question the value of the coal resource which exists under the original BOAs presented in the EA (\$6.2 Billion). Specifically, it was stated that the EA did not provide information on the value provided including details about the volume, extent, quality or the economic availability of the resource or the calculation used to arrive at this value. One submission also stated that Integra had known that coal was under the onsite biodiversity offset areas when agreeing to the original conditions of consent in 2008.

The valuation of coal resources, particularly whilst still in the ground, is a complex calculation of projected extraction costs and predictions of the future movement in coal pricing and foreign exchange value. The quantity of coal that can be feasibly extracted, that would otherwise be sterilised by the approved BOAs, has been estimated using standard industry practices. The valuation of \$6.2 billion was subsequently made by multiplying the quantity estimate by the projected coal price through the port of Newcastle for the coal quality typically produced at Integra at the time of the preparation of the initial application to modify the timeframes for long term security of the BOS, in 2011.

3.2.4 Closure of the Integra Complex

Many of the individual and special interest group submissions questioned why the modification was required, given that the Complex has recently announced it proposes to enter into care and maintenance. Some submissions also raised matters related to the ability of Integra to manage the revised BOS and commitments for regeneration and rehabilitation of the mine into the future, given its care and maintenance status.

Irrespective of the care and maintenance status of the Complex, as discussed in Section 3.1.2 above, Integra is required to, and intends to, fulfil its commitments under the project approvals. While the Complex is entering a phase of care and maintenance due to a downturn in economic conditions for the broader coal industry, it is feasible that the Complex may become profitable in the future with changes in economic conditions.

Despite its care and maintenance status, Integra is still required to meet its project approvals' requirements, including rehabilitation and land management requirements. Integra is committed to the regeneration of the woodland in the revised BOAs in accordance with the BOS proposed under the modification. The BMP will be updated to reflect the necessary requirements for the management of the offset areas into the future. The funds required to implement the BMP will be held in a conservation bond, to ensure that the management outcomes are achieved.

Further, an annual review is produced each calendar year in accordance with the project approvals' conditions. The performance of, amongst other environmental aspects, rehabilitation and land management requirements will continue to be documented in the annual review and made available to the community on the Integra website: <http://integra.valeaustralia.com.au>.

3.2.5 Stakeholder engagement

Several submissions identified the level of stakeholder engagement for the modification as being inadequate. One submission noted that there was no attempt to contact regional groups such as HCN, who has a direct interest in the management of impacts of coal mining in the Hunter Valley, and that the community information sessions conducted in Singleton were only advertised through the company website and a newsletter distributed to immediate neighbours of the mine.

As stated in Chapter 5 of the EA, Integra's existing comprehensive stakeholder engagement strategy is in place for the Complex supplemented by activities specifically related to the proposed modification. The stakeholder engagement activities were based on the nature and scale of the proposed modification, which, while not inconsequential, was considered to be relatively minor given no changes to Integra's operations were sought, and no stakeholders would be adversely impacted as a direct result of the modification. Notwithstanding, consultation with the local community regarding the modification included:

- three face to face meetings with Singleton Shire Council, on 31 March, 8 April and 19 May 2014;
- presentation of an overview of the proposed modification to Integra's community consultative committee (CCC) on 26 March 2014;
- distribution of a community newsletter on 16 April and 28 April 2014 to local residents;
- two community information sessions, held at the Singleton Library on Wednesday 7 May and Thursday 8 May 2014; and
- discussions with individual community members unable to attend the community information sessions.

The modification was also discussed with a number of stakeholders at face to face meetings held as part of Integra's regular stakeholder engagement with its neighbours.

Appendix A

Summary of matters raised in each submission

Submission details				Key matters raised															
RTS ID	Location (if provided)	Name	Object/ support	General objection to biodiversity impacts	Adequacy of revised BOS - not like for like, removes protection for excised BOAs	New offset areas exclude impacted EECs and habitat for threatened species	Cumulative impacts to biodiversity values in the Hunter Region	Inadequate detail provided on the values of the BOAs to be excised	Ability of Integra to achieve rehabilitation commitments	Modification of offset areas will release areas for future mining	Potential future impacts on landholders due to removal of buffer between landholders and the complex	Adequacy of stakeholder engagement	Adquacy of economic justification	Objecto ton continued extension of timeframe for long term security	Inadequacy of info provided	Concerns with general offsetting policy for mining projects	Modification cannot be justified given care and maintenance status of Integra	Impacts of mining on climate change	
71	Bulga	Ieslie Krey	Object			•											•		
72	East Maitland	Margaret Edwards	Object			•											•		
73	Warabrook	Maxine Zerafa	Object			•											•		
74	Bundeena	Megan Benson	Object			•											•		
75	Maryland	Michael McCallum	Object			•											•		
76	Maryville	Michael Osborne	Object			•											•		
77	Nelson Bay	Nigel Waters	Object			•											•		
78	Callaghan	Paul Hodge	Object			•											•		
79	Gulgong	Paul Kreuzen	Object			•											•		
80	Adamstown	Paul Winn	Object			•											•		
81	Allynbrook	Penny Kater	Object			•											•		
82	Newtown	Petra Liverani	Object			•											•		
83	Charlestown	Phillipa Parsons	Object			•											•		
84	Hamilton	Richard Fletcher	Object			•											•		
85	Gulgong	Robert Campbell	Object			•											•		
86	New Lambton	Robert Gibberd	Object			•											•		
87	Bulga	Robert McLaughlin	Object			•											•		
88	Tenambit	Sarah Kendell	Object			•											•		
89	Darlington	Sascha Fuller	Object			•											•		
90	Singleton	Sharyn Munro	Object			•											•		
91	Liverpool	Signe Westerberg	Object			•											•		
92	Waramanga	Simon Sheikh	Object			•											•		
93	Koatara	Sonya Manzalini	Object			•											•		
94	Hamilton	Steve Denshire	Object			•											•		
95	Islington	Su Morley	Object			•											•		
96	Booral	Susanne Skates	Object			•											•		
97	Merriwa	Ted & Jenny Finnie	Object			•											•		
98	The Hill	Therese Doyle	Object			•											•		
99	Seaham	Tracie Hendriks	Object			•											•		
100	Mudgee	Veronica Burns	Object			•											•		
101	Mudgee	Wendy Arnott	Object			•											•		
102	Muswellbrook	Wendy Wales	Object			•											•		
103	Camberwell	Anonymous 2	Object	•	•	•	•		•		•						•		
104	Camberwell	T de Jong	Object	•	•	•	•	1	•	3	•	1	6	1	0	8	•	4	
			Total	4	10	95	7	1	6	3	3	1	6	1	0	8	88	4	



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