



Hunter Environment Lobby Inc.

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Mining Projects
Department of Planning and Infrastructure
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Submission of Objection

MT ARTHUR COAL MODIFICATION (09_0062 MOD 1)

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for more than fifteen years on the issues of environmental degradation, species and habitat loss, as well as climate change.

HEL objects to the proposed Mt Arthur Coal expansion because of the cumulative impact on biodiversity in the Upper Hunter and the longterm degradation of the health of the Hunter River.

HEL does not support the proposed loss of 230 ha of native vegetation that provides habitat for a range of threatened species and endangered ecological communities.

These same species are continuing to lose habitat with every mine approval in the Hunter Valley. The cumulative impact of this ongoing loss is not be assessed by the NSW Government.

The proposed offset for this opencut extension is highly unsatisfactory. The proposed offset of 427 ha of mainly cleared grassland in the Saddlers Creek area does not contain any remnants of the threatened Central Hunter–Ironbark–Spotted Gum–Grey Box Forest EEC.

The proposal will destroy a significant number of hollow bearing habitat trees and an area of woodland containing important habitat features for a number of species listed for protection under the *Environment Protection and Biodiversity Protection Act 1999* (EPBC Act).

The proposed offset area will not provide the lost nesting, refuge and foraging values used for threatened fauna species.

HEL is particularly concerned that the proposal will destroy known foraging areas for the vulnerable Grey-headed Flying-fox (*Pteropus poliocephalus*) and that five individuals were recording feeding on nectar and pollen of flowering Spotted Gum in the area of impact.

There is no indication that the project has been lodged as a controlled action under the EPBC Act. The proposal to destroy 58.4 ha of the critically endangered Grassy Box

Gum Woodland CEEC and habitat for threatened flora and fauna species listed under the EPBC Act requires the action to be lodged with the Federal Department of Sustainability, Environment, Water, Population and Community (SEWPaC) for assessment.

The cumulative impact on groundwater systems and surface water systems and loss of base flows to the Hunter River plus deteriorating water quality has not been taken into account.

HEL is concerned that all current water monitoring on the site of the current Mt Arthur Coal operations are recording elevated salinity levels. The increase of mean conductivity in the river from 447uS/cm upstream to 512uS/cm downstream indicates that this mining operation is having a significant effect on the base salinity level of the river. This increase in background salinity level is occurring outside the Salinity Trading Scheme.

The cumulative longterm increase of salinity in the base flows to the Hunter River from existing mining operations in the valley must be addressed before any more expansion of coal mining can be considered.

HEL does not support the retention of final voids in the landscape because of the longterm risk of highly saline water seepage back into the groundwater system, into base flows to the Hunter River and associated tributaries, and potential for unmanaged overflow into surface catchments.

All voids approved in the current Mt Arthur Coal operations need to be filled as part of the final landform.

HEL does not support the economic analysis of the proposal to be a true and factual assessment. The justification to extend current mining operations at Mt Arthur Coal does not take into account the longterm deterioration in the health of the Hunter River system or the biodiversity values of the Upper Hunter.

Mt Arthur Coal is one of the largest producers of coal in the region with a large footprint that will not be possible to adequately mitigate over time.

HEL does not support this extension proposal.

Yours sincerely

A handwritten signature in cursive script that reads "Jan Davis". The signature is written in dark ink on a white background.

Jan Davis
President