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Mr Philip Nevill
Senior Environmental Assessment Officer
Energy, Industry and Compliance
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2150

26 February 2021

Dear Philip

RE: NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION PROJECT ENVIRONMENTAL IMPACT STATEMENT (SSD 10269) – SUBMISSION FROM FORESTRY CORPORATION OF NSW

Forestry Corporation of NSW (FCNSW) has reviewed the Environmental Impact Statement for the Narrabri Underground Mine Stage 3 Extension Project as exhibited 29 October 2020 (EIS).

FCNSW's review of the EIS comes more than 12 months after Whitehaven Coal and FCNSW first began discussing (and agreeing to) strategies to accommodate Whitehaven Coal's planned changes to the use of State forest as a consequence of the proposed Stage 3 Extension Project. Listed in the submission herein are the matters with which discussions between the parties continue towards resolution.

Should your department have any questions regarding these listed items, do not hesitate to contact me.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Jarod Dashwood".

Jarod Dashwood
Forest Occupancy Supervisor
FCNSW WESTERN REGION

1. Electricity supply

- 1.1. It is FCNSW's position that where overhead electricity transmission lines (ETLs) are built in State forest, the breadth of vegetation clearance and route of ETLs negate possible impact from windthrow (trees uprooted by wind). These prescriptions would be outlined in the Bushfire Management Strategy.

2. Mine site ecological rehabilitation

- 2.1. FCNSW would expect that subsection to and registration of, State forest land as *mine site ecological rehabilitation* works be agreed between Whitehaven Coal, Department of Planning, Industry and Environment (DPIE) and FCNSW as part of the preparation of the Stage 3 Extension Rehabilitation Management Plan (described at Appendix D p93). Is it the intention of Whitehaven Coal to nominate FCNSW as a consultative body for the drafting of this management plan?
- 2.2. What does Whitehaven Coal understand about landholder obligations to manage land subject of *mine site ecological rehabilitation* following mining lease relinquishment (i.e. restrictions to hazard reduction burning, timber harvesting, backburning in wildfire events etc)?

3. Fire

- 3.1. As the statutory land manager of MLA2 and a fire fighting authority defined under the *Rural Fires Act (1997)*, FCNSW expects to participate in the formulation of the Bushfire Management Strategy to be approved by DPIE (Ref. EIS Attachment 4 pA4 - 16).
- 3.2. The Bushfire Management Strategy to be prepared in consultation with fire fighting authorities should include a description of equipment and other resources to be made available by Whitehaven Coal for bushfire detection and suppression on (and possibly adjacent to) land which Whitehaven Coal are conducting works.

4. Subsidence and surface cracking on State forest

- 4.1. Unrepaired surface cracks and deformations may cause safety issues for FCNSW staff and other forest users when mining title is relinquished at the cessation of the project (Ref. Appendix D p100). FCNSW acknowledges the challenge Whitehaven Coal will face in balancing intrusive civil repairs to address safety risks while considering the consequential environmental disturbance necessary to facilitate such repair.

FCNSW asks that DPIE (through project approval conditioning) list FCNSW as a consultative body in the formulation of the Rehabilitation Management Plan, the Extraction Plans and the Mine Closure Plan, and that the regulator, landholder and proponent all agree (as part of the authoring of the plans) to the necessary works to achieve safe and stable outcomes for the relinquished public land.