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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

18 August 2021

Dear Philip

RE: NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION PROJECT ENVIRONMENTAL IMPACT STATEMENT
RESPONSE TO SUBMISSIONS AND AMENDMENT REPORT (SSD 10269) – SUBMISSION FROM FORESTRY
CORPORATION OF NSW

Find herein Forestry Corporation of NSWs (FCNSW) comments following review of the *Response to Submissions (RTS)* and *Amendment Report* associated with the Environmental Impact Statement for the Narrabri Underground Mine Stage 3 Extension Project as exhibited 29 October 2020 (EIS).

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

Yours faithfully,

Jarod Dashwood
Land Access Manager
FCNSW WESTERN REGION

1. Introduction of flaring

- 1.1. Section 3.3.1 of the *Amendment Report* introduces the likelihood of the use of flares in a bushfire prone environment. Where will Whitehaven Coal document their flare management procedures? What standards of vegetation clearance will be used? Will FCNSW and the NSW Rural Fire Service be consulted as part of the drafting of flare management procedures?

2. Expansion of groundwater monitoring network

- 2.1. The *RTS* describes the expansion of Whitehaven Coal's groundwater monitoring network (p.31). Will any of these sites be on State forest beyond the boundary of MLA2?

3. Electricity Transmission Line Corridors

- 3.1. FCNSW expressed concerns that windthrown trees could impact above ground electricity transmission lines (ETLs) if cleared corridors hosting ETLs were not wide enough (February 2021). Page 74 of the *RTS* highlights FCNSW's commentary. The *Amendment Report* proposes a reduction in the ETL corridor width (p.13). To what degree is ETL corridor width being reduced?
- 3.2. How does Whitehaven Coal propose to reduce the likelihood of windthrown trees impacting the ETLs? Is there opportunity for single tree removal along the ETL corridor (E.g. remove individual trees which are of a height which pose a risk to the ETL)?
- 3.3. In response to the proposed reduction in ETL corridor width, Whitehaven Coal proposes to consult with FCNSW regarding bushfire management adjacent to the ETLs (*RTS* p.74). However for FCNSW, prevention of ignition as much an issue as control of consequential fire. Surveillance and fuel management for example will not necessarily prevent ignition from becoming an uncontrollable fire in many fire weather circumstances. The matter of reducing ETL corridor width and how this effects ignition risk should also be specifically raised with the NSW Rural Fire Service.
- 3.4. The *Amendment Report* describes updated ETL engineering design (Unity Power Engineers 2021) (page 13). What are these new design controls and how will Whitehaven Coal prevent trees falling across the ETLs?