

Whilst we appreciate that Boggabri Coal intends to maintain the employment life of its existing staff for a further six years, we believe that this is just a denial of the obvious need for a swift transition and a procrastination of the inevitable change in its business model. Given the current climate situation, no further coal should be mined and burnt in the world if we are to prevent catastrophic impacts. The quicker that Boggabri Coal moves to renewables, the better and this Modification takes it further from being able to make this change.

Our objection to this modification is on three grounds; 1. that a modification is not an applicable process for this project, 2. The impacts to surface water and zone 4 water from this modification are significant and 3. the climate impacts from this modification are too great.

We believe that this modification should be considered as part of the cumulative impacts of all mining projects in the Namoi Valley and should not be considered in isolation from the impacts across all developments currently operating, approved and proposed across the valley. The Namoi has reached its saturation point of mining and no further expansions or approvals should be given. The scale of this expansion is such to warrant a full IPC assessment process, not just a modification application and approval by the Department with no external review.

Secondly, it appears that Boggabri Coal has not been complying with its surface water management plan and has not been diverting clean water away from its mining pit. It appears that Boggabri Coal does not have an appropriate licence to be harvesting the overland flow that once was Nagero Creek. Furthermore, its Zone 4 groundwater licence (WAL 2571) does not have a works approval associated with it that allows for mining. We believe Boggabri Coal currently does not have enough water licences for its operational needs.

This is a common theme in the Namoi Valley, with Whitehaven Coal recently pleading guilty to illegally harvesting surface water from the Maules Creek catchment. These mines are squeezing the life out of our community by holding up water in the catchment so that it never replenishes the creeks, river, groundwater and soils of our area. This must stop.

Thirdly, the greenhouse gas emissions from this expansion are extraordinarily disproportionate to the rest of the development and are an unacceptable level of risk for our time. Should DPIE approve this Mod 8, it would be inconsistent with the Department's own position on Scope 1 and 2 emissions. The NSW IPC has previously found in the case of Hume Coal that (a smaller GHG footprint than this Modification) was "not justified" and "would result in intergenerational inequity". Why would this project be different, with a higher GHG footprint?

This Modification will see Scope 1 and 2 emissions more than triple, from 0.2Mt CO<sub>2</sub>-e p.a. to 0.69Mt CO<sub>2</sub>-e p.a. and yet Boggabri Coal has no credible plan to minimise the emissions of Mod 8.

In particular, fugitive emissions are a massive problem with this Modification and is largely responsible for this tripling of annual emissions. The UN has stated that three of the four countries which currently buy coal from this mine need to stop burning coal by 2030. If this MOD 8 is approved, Scope 1 and 2 GHG emissions from recently approved coal and gas projects will add 95.18 Mt CO<sub>2</sub>-e to the NSW inventory, cancelling out all and more of the 90 Mt CO<sub>2</sub>-e savings of the Electricity Infrastructure Roadmap. They will also work against the NSW Government's policy goal to cut NSW's emissions by 35% by 2030.

We object to this Modification for these three primary reasons.