



Wando Conservation and Cultural Centre

submission to

Boggabri Coal Mine

MOD 8 - Increase in depth of mining

Increase in depth of mining and construction of fauna crossing

Wando urges the Department to reject the application.

Wando Conservation and Cultural Centre Inc (Wando) is based at Maules Creek approx. 70 kms from Gunnedah; we engage in research and monitoring to protect the environment and the communities in an area encompassing Narrabri- Boggabri- Gunnedah. We have drawn attention to the negative environmental, social and economic impacts of Boggabri Coal Mine since its commencement as modification upon modification has been approved with scant consideration of the precautionary principle, intergenerational equity and ecological sustainable development. Cumulative negative impacts associated with large adjacent mines and the modifications which they have been granted also added to the destruction of biodiversity and serious impacts on water security.

Wando urges the Department to reject the application on a number of grounds including:

1. The size and nature of the Modification which are such that it would properly be regarded as project in its own right
2. Water issues- both surface and groundwater
3. Greenhouse gas Emissions

1. Size and nature of the Modification

Boggabri mine, a wholly foreign-owned entity, is seeking approval to mine an extra 61.6 million tonnes of coal and extend its operation for six years to 2039. Mining and burning coal from the extended mine will result in 359 million tonnes of greenhouse gases according to the assessment provided by the proponent and we understand that 152.4 million tonnes of this would be directly attributable to the modification.

‘Modification Creep’ has seen the approval of over 20 modifications for the four large mines in the vicinity. The size and potential impact of Modification 8 is so significant that the community’s right to due process would have been served by the treatment of this project as a State Significant Development in its own right.

2. Water:

a. Surface

- i. The mine’s 2020 Annual Review maps show streams apparently flowing into the mine pit contrary to the mine’s 2010 Environmental Assessment
- ii. The mine appears not to hold licences for the surface water which will be captured under the proposal
- iii. The mine’s 2020 Annual Review acknowledges *the currently approved SWMP is non-complaint...*

b. Groundwater

- i. Groundwater inflow, which will be dramatically increased if this proposal is approved, will cause more than 2m drawdown, up to a maximum of 5m in zone 4 of the Namoi alluvium, a productive groundwater source relied on by the farming community
- ii. It is predicted that the Namoi River will experience a 2ML per year loss of base
- iii. We are all increasingly aware of the implications of climate change and increased likelihood of extreme climate events such as drought. The region has recently experienced its worst drought on record during which the river ceased to flow for an extended period. There is no mechanism by which the groundwater inflow to mining pits can be stopped during drought- an additional element of unacceptable risk.

3. Greenhouse Gas Emissions

Wando concurs with the consensus that we must limit greenhouse gas emissions and accelerate Australia's transition to net zero to avoid the worst impacts of climate change; this intention must underpin decisions made across all levels of governments. The NSW Government has a stated goal of decarbonisation by 2050 and 90 million tonnes of reduced carbon emissions to 2030. Any chance of a just transition to a fossil-fuel-free economy in time to avert disaster is lost should this project be forwarded. As our major trading partners, the EU, China, Korea, Japan and the US all move to implement rapid decarbonization we face the very real prospect of stranded assets alongside environmental degradation.

Wando was heartened by the Hume Coal decision (30 Aug 2021) in which The NSW IPC acknowledged that the 106.7 Mt CO₂-e of GHG emissions from the Hume mine "are not justified" and "would result in intergenerational inequity". See

NSW IPC Statement of Reasons for the Hume Coal decision [available here](#)
Boggabri Mines reported onsite - Scope 1 and 2) emissions of 174 kilotonnes in the mine's Annual Review for 2020. The assessment for this modification shows that volume increasing to 740kt and 800kt in the coming years. This is a significant increase in greenhouse emissions, both in overall volume and in the intensity of emissions released per volume of coal mined.

Boggabri Mines must also be held to account for Scope 3 emissions.

The community at Maules Creek has suffered the destruction of a valuable environmental asset and of social bonds and has been responsible for monitoring and compliance of mines under the most trying of conditions. The precautionary principle, which the World Health Organisation advocates should be adopted if we are to protect public health, the environment and the future of our children, would indicate the modification must be rejected