

Boggabri Coal – MOD 8 – Increase in Depth of Mining.

I object to this Modification 8

I appreciate the opportunity by the Department to provide a submission on this proposal.

I strongly object to the approval of this modification, and urge the department to consider the impacts to the environment, near neighbours and local Maules Creek community and the increase in GHG emissions that will contribute to an increase in temperatures and further suffering and destruction to our planet. This modification is not in the interest of the people or planet. Therefore it should be rejected.

The extent of this proposal suggests that it should be classified as a new State Significant Development application where cumulative impact assessments would be taken into account, rather than an extension being assessed as a modification. The large volume of coal, 61.6 million tonnes, to be extracted from the coal seams down to the Templemore seam in itself would indicate that this is not just a modification. There are many impacts to be considered that will not be considered in a modification. For this reason, it is very distressing and disappointing that my community will have to endure an increase in cumulative environmental and social impacts from this modification if it is approved.

Increasing the approved maximum depth of mining down to the Templemore Coal Seam:

Just recently the NSW IPC have said that the 107 Mt of GHG emissions from the Hume Coal Mine “are not Justified”, and that they “would result in intergenerational inequity”. If Boggabri Coal MOD 8 were approved, they would be adding 152 Mt of GHG’s, from this modification alone. If Boggabri Coal are truly committed to reducing their Greenhouse Gas emissions, then the study that they say they are committed to commissioning on GHG Minimisation, should have formed part of this modification assessment.

On this GHG issue alone this modification would be contributing to the increase of impacts of global warming that is causing significant impacts on our Pacific Island neighbours and global warming in general, instead of reducing GHG emissions which is the goal before or by 2050.

‘Question Today, Imagine Tomorrow, Create for the Future’ - Boggabri Coal’s Motto.

We should all **‘Question Today’** and any decision to continue digging up another 61.6 million tonnes of fossil fuels and contributing to more Co2 and Climate changes that will create an unliveable future for humans and all species on earth, from increased rise in temperatures, to more bush fires, depleting our water and longer harsher droughts.

Reject this modification of another 61.6 million tons of coal being mining to an even deeper level down to the Templemore coal seam.

I **‘Imagine Tomorrow’**, a better place if we consider that we are all interconnected with nature, therefore we need to protect the environment, not just for humans but for all fauna and flora. Plant more trees, not bulldoze them to facilitate more fossil fuels being dug up and burnt.

We can **‘Create for the Future’**, leave the coal in the ground, the Leard State Forest intact and look to a lighter footprint on earth for all living species. Renewables can be a stepping stone to climb our

way out of a heating planet, without destroying the earth and digging up our past and destroying habitat our native species need and rely on, without destroying cultural heritage, and diminishing the amenity of the local community. When the world is turning away from fossil fuels, I ask Planning to consider the future of the next generation and reject this MOD 8.

Six-year extension to mine life - 31 December 2033 to 31 December 2039:

Environmental and Social Impacts:

Our local community expectation was not for these Leard State Forest Precinct mines to continually be granted Extensions and Modifications year after year. The initial Project Approvals are changing rapidly from an original expected life of 21years of mining to 33years, impacting on our local community with dust, noise, light, vibration and loss of water. To grant another continuation for six more years of suffering these impacts, and having negated the communities right to a peaceful and amenable life by changes in legislation, to allow higher limits of these many impacts, is unconscionable. Open cut coal mining in the Leard State Forest has certainly become a major imposition on the local community and environment and more so due to cumulative effects from three mines in the Leard State Forest, which due to the modification process will not be taken into account.

Self-reporting for compliance is inadequate. Ongoing threats and concerns of toxic blast fumes, to the shaking of houses 12 kms from this mine is of real concern to locals who can report these incidents, but only get a reply stating that everything was compliant within allowable noise, blasting, vibration limits. It doesn't feel that way when the whole house shakes. Obviously, modelling is not as accurate as we are made believe, and this now weighs heavy on the local community. I urge Planning to reject this MOD 8.

Construction of a specifically designed fauna movement crossing:

It amazes me how some proponent paid Ecologists and Environmental Superintendent's don't see the big picture when it comes to destroying even the smallest of patches of 'Old growth' forest with longstanding habitat options that sustain life for a wide variety of Vulnerable and Endangered species of fauna and flora.

The significance of even the smallest of areas such as this proposed 3.31ha to be cleared and used for a 'Fauna Crossing' when the best 'Crossing' is the undisturbed Old growth trees and shrubs and ground cover that have long been the home and habitat for many species, makes no sense. In the case of some birds, and the Vulnerable Micro bats this small area has been their foraging habitat patch of Leard State Forest, well before mining. Even our threatened Koala has been recorded in this locality, yet Boggabri Coal want to clear this area.

This is not about protecting fauna with a 'crossing' its about looking good in the eyes of the determining body, and future use of this 'fauna crossing' to 'offset' the future destruction of the real wildlife corridor between the Whitehaven Coal mine and the Boggabri Coal mine that both mines have always intended to mine through, the last 'real wildlife Corridor' left in the Leard State Forest. But at what cost to the environment, fauna and flora? Every Old growth tree with habitat potential and hollows that is cleared is one step closer to even the tiniest of creatures becoming vulnerable to

extinction, be it local or widespread extinction. No trees, shrubs or grasses in this area need be bulldozed, or should be bulldozed for a fauna crossing.

The cumulative effect of continuous small sections of this once contiguous Leard State Forest being eaten away bit by bit goes under the radar because it is done tiny piece by piece, that doesn't fit the criteria of the EPBC Act of Significant Impact Assessment. The premise being that there is plenty left in the rest of the Forest! Well, there will come a time when it is too late to save some of these Vulnerable species as they will have no more habitat, in the Leard State Forest or even distant remnant habitat areas. As for Species Credits and Ecosystem Credits, that doesn't replace the original habitat that these species call home. Species Credits are a joke. A tool used by companies to destroy threatened Plant Community Types and critical habitat.

Just because a species wasn't present when a survey was carried out, doesn't preclude the possibility that vulnerable or other native species of fauna do not utilize the area as their base habitat, or foraging habitat area.

Dusky Woodswallow; Speckled Warbler; Brown Treecreeper; Varied Sittella; Little Lorikeet; Little Eagle; Turquoise Parrot; Barking Owl; Grey-crowned Babbler; Pale-headed Snake; Koala; and Microbats.

All these Vulnerable species have been recorded in the area or in close proximity to the area that is to be destroyed and be replaced with a 'yet to be designed' Fauna Crossing, if this MOD 8 is approved.



Vulnerable - Yellow-bellied sheath-tailed bat. © R. Druce

These represent just some of the species that have no voices and are at the mercy of humans who are destroying their habitat in the Leard State Forest.

Except for the Koala photo, these species all called the Leard State Forest, their home.

I request that this Fauna Crossing not be approved, it is in an area that already has habitat and the loss of this habitat is greater than the justification for a Fauna Crossing in this area. Therefore, this MOD 8 should be rejected and not approved.



Koala



**Brown Treecreeper
(male & Female)**



**Turquoise Parrot
(nesting)**

Photos by R. Druce ©

Surface Water and Groundwater and GDE impacts:

It is well known that groundwater drawdown can have a devastating impact on Alluvial aquifer GDE's, Stygofauna. Korbel et. al. (2013) as noted in Appendix Q, 21 taxa were found in the Gunnedah Coal Basin, Namoi River catchment as well as in the Boggabri Coal site. These GDE's are paramount to sustaining clean and healthy aquifers.

Mining down to the Templemore seam could have a devastating drawdown impact, and ultimately endanger these aquatic GDE's. It has been acknowledged by groundwater assessment and modelling that there will be a drawdown in the Namoi Alluvium anywhere from 2m to 5m in Zone 4. Modelling is only as good as the data that is entered, and then it is not always accurate. It is too late when aquifers that are highly interconnected are drained due to modelling errors.

Drawdown of ground water not only impacts the aquatic alluvium ecosystems, but the surrounding farming community that rely on bore water for stock and domestic use, and the remaining, surrounding established Old growth trees in the Leard State Forest that will be impacted by edge effect surrounding the cleared mining areas. Then there is the impact on the Namoi Alluvium which is the connection to the Namoi River, which is the life blood of this district, downstream towns, farms, riparian communities and all ecosystems in close proximity to the Namoi River channels and tributaries. Any interference and drawdown of the aquifers and ground bores must be paramount to any decision that could jeopardise water security for the local communities and towns. This modification must be rejected, on the basis of the volume of water somewhere between 80ML and 100ML that is required to mine and wash these extra millions of tonnes of coal, even in dry years

when there is little rain, the mines have the advantage of 'passive-take – pit inflow' which is still paramount to stealing water from the environment, all due to the disturbance of the natural environment that was once a Tier One Forest.

Seeking approval for an increase in height to 400m:

I can only imagine that the burial of many thousands of tonnes of Off Road Tyres (ORT) would need extra height to accommodate this type of mass burial, hence the requirement for an increase in height by a further 5m. The local community are upset and disgusted at the prospect of mining companies using a Publicly owned State Forest as a dumping ground for waste tyres, out of site, and no indication or mention to the community that this has been 'the usual practice' since 2006. The cost and burden of disposal of Waste Tyres is something that the company should shoulder, not the local environment. How many thousands of tonnes of ORT have been dumped in the pit in the last 15years? All this without the appropriate Environmental Protection Licence.

The cost to dispose production 'waste' and no near recycling facility is not a good enough excuse to use the Publicly owned Leard State Forest as a 'Waste Facility', which it is not registered as. Boggabri Coal has predicted that it would need to continue to bury 200 of these ORT's every year until a recycling solution can be found. There are already recycling facilities that can recycle ORT. If no solution is found then the number of tyres to be buried would equate to 3,600 ORT x approximately 4.5 tonnes per tyre = 16,200 tonnes of waste ORTs over 18 more years till 2039 if this modification was approved, and that's on top of the millions of tonnes that have already been buried since 2006, without public knowledge. Onsite burial by mining companies in the Leard State Forest and on the wider Liverpool plains has already been investigated by EPA, and it was found that six mining sights were all in breach of their Environmental Protection Licences (EPL) for the burial of ORT in pit or under Overburden. Burial of waste tyres needs to be in Project Approvals, and comply with the POEO Act., which these mines burials do not.

Rehabilitation, Biodiversity and Landform:

Rehabilitation and tree planting is commendable, but in no way replaces hollow bearing Old growth trees in the Leard State Forest that are up to a hundred years old or older. There is no justification for more clearing. If Zero emission targets are to be reached, in 2050, and let's hope it is sooner than that, and mining of coal comes to an end due to declining market demand being replaced with renewable energy, which it will, the planning for transitioning should be based around rehabilitation and final landform, not destroying more Old growth forest, and digging up 61.6 million more tonnes of coal. Transitioning more workers so when the day comes that not just myself and my community say enough is enough, but the whole world agrees that fossil fuels are destroying the planet, and coal mines are a thing of the past, the workers in these coal mines will have new job skills.

This modification is a disaster waiting to happen, destroying a forest, altering the whole topography of the Leard State Forest, destroying cultural heritage that may never be found or replaced, a local farming community and depleting the environment of its water, and native habit for the fauna.

I appeal to your better judgment to reject this modification on these many grounds that I have brought to your attention, as a proud local community member who cares about the future of this district of producers of agricultural products that help feed the nation. Please reject this MOD 8.