

The Hon Anthony Roberts MP  
Minister for Planning  
Major Projects

By email: <https://pp.planningportal.nsw.gov.au/major-projects/projects/dendrobium-mine-extension-project-0>

14 June 2022

## **National Parks Association of NSW submission on the Dendrobium Mine Extension Project**

Dear Minister Roberts,

### **Introduction**

The National Parks Association of NSW (NPA) was formed in 1957 and sixty-five years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge, evidence-based approach to conservation advocacy and a commitment to the creation and professional management of protected areas in NSW.

### **General comments**

This submission strongly opposes the *Dendrobium Mine Extension Project*. The proposal will have an unacceptable intensity and scale of environmental impact in a catchment of exceptional natural and cultural heritage value. NPA's view is that the entirety of the Metropolitan Special Area should be gazetted as National Park and afforded full legal protection from any further mining proposals.

The assessment process for this revised proposal exposes the tokenistic approach to community engagement that unfortunately characterises environmental planning in NSW. It is outrageous that one of the few proposals even refused consent by the Independent Planning Commission (IPC), has been marginally modified, classified as State Significant Infrastructure and resubmitted for approval. The fact that the Department of Planning recommended that the IPC approve the previous application, despite the unacceptable impacts identified by NPA and numerous other stakeholders, offers little confidence in the integrity of the upcoming assessment process.

Notwithstanding our concerns NPA believes it is important to document our reasons for opposing any further underground coal mining in the Special Areas including the Dendrobium Mine Extension Project. This submission should be read in conjunction with the more detailed submissions by NPA's Dr Peter Turner, Southern Sydney and Macarthur branches.

### **Detailed comments**

#### **Ground water and hydrology**

One of the primary mechanisms by which the proposal will exert an unacceptable level of adverse environmental impact is through disruption of ground water and the associated surface hydrological system. The detailed submission by NPA's Dr Peter Turner

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demonstrates that the proposal would generate both immediate and perpetual loss of water over a substantial portion of the Special Area. Dr Turner's analysis contradicts the EIS's claim that there will be 'no predicted "seam to surface" fracturing' associated with the proposal. He casts serious doubts over the technical adequacy of the modelling of the impacts of mining, noting that it relies upon the use of above average rainfall data from the last 2 years.

It beggars belief that a NSW Government that repeatedly refers to the importance of dams for water security and economic growth would contemplate such risks. NPA recommends that the Minister adopt the same level of caution in relation to this critical water catchment as the IPC and refuse the application.

### **Biodiversity impacts**

The proposal is likely to have an adverse impact on the surface of the Metropolitan Special Area. Tellingly, many of the biodiversity values described in the EIS are associated with water dependant ecosystems and are therefore highly sensitive to hydrological changes. In addition, direct environmental impacts would result from the construction of roads, utilities, surface installations, coal wash facilities and emplacements. The combined result is a development footprint that ranges from habitat degradation to outright destruction. Added to this 'planned' footprint are the future spills and accidents that the history of mining in this region suggests will cause further environmental damage.

The biodiversity assessment attached to the EIS demonstrates the loss of habitats for several species of threatened fauna, flora and threatened ecological communities. Disturbingly, the EIS fails to assess the significance of at least one threatened species, Koala. In any case, our view is that the use of biodiversity offsets is wholly inappropriate in areas where the conservation of biodiversity is a primary objective, including Special Areas under the *Water Act*. Such areas offer few if any opportunities for genuine 'like for like' offsets, and instead rely upon financial compensation rather than any meaningful mechanism to reduce biodiversity loss.

Further, offsetting is wholly inadequate in settings where the values of natural landscapes extend beyond the presence of specific species or communities to encompass the integrity of ecosystem processes at the catchment or landscape level. In NPA's view this proposal is entirely inconsistent with the *Water Act's* statutory objective of 'maintaining the ecological integrity of an area of land to be declared as a special area' (Div2 (47)(2)(b)).

### **Consideration of alternatives**

The proponent asserts that the specific type of coal targeted in this proposal plays an irreplaceable role in the operation of the Port Kembla steel mills. The EIS dismisses the use of alternative sources and alternate technologies. Such self-serving arguments cannot be allowed to stand in the way of meaningful action to transition high carbon emitting industries to more sustainable alternatives.

## Summary

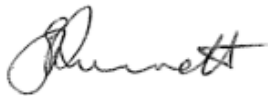
This proposal offers the opportunity for the NSW Government to make a principled decision, to:

- maintain the integrity and independence of the IPC model;
- avoid significant direct and indirect environmental impacts on an area of exceptional importance for biodiversity and water security;
- confront the 'business as usual' attitude of the NSW fossil fuel industry; and
- commence the process of setting the NSW steel industry onto a sustainable pathway.

In short, the Dendrobium proposal should be refused.

I can be contacted at [garyd@npansw.org.au](mailto:garyd@npansw.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dunnett', with a stylized flourish at the end.

Gary Dunnett  
Chief Executive Officer  
**National Parks Association of NSW**  
*protecting nature through community action*