

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Monday 12 December 2022

Submission of Objection

Moolarben OC3 Extension Project - SSD-33083358

Introduction

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

The current Moolarben Coal Complex is a very large mining operation with approval to produce 22 mtpa of thermal coal on the headwaters of the Goulburn River. The cumulative impact of current approved operations already continues up to 2038.

CWEC strongly objects to the proposal to extend mining disturbance in Open Cut 3 and release of additional carbon and methane into the atmosphere through the extraction of a further 40 Mt thermal coal. There is no justifiable reason for this proposal to be approved.

The consequences of not proceeding with the proposal includes the prevention of cumulative impacts through the protection of:

- 624.18 ha native vegetation including 477.75 ha of Critically Endangered Box-Gum Woodland Ecological Community (CEEC) listed as a Matter of National Environmental Significance under Federal law.
- A significant area of habitat for 22 threatened species including critically endangered fauna species
- 825.58 hectares including prime agricultural land and aquifer recharge areas
- Base flows to creeks and Goulburn River
- At least 130 Aboriginal cultural heritage sites including a possible burial site and grinding grooves
- The atmosphere through no additional emissions of at least 86.59 Mt CO₂-e

None of these impacts have been adequately costed and cannot be offset. The social, environmental, and economic costs of proceeding with the proposal far outweigh any benefits. The main beneficiary of the proposal is Yancoal, a Chinese multinational that exports profits.

Moolarben Mining Complex falls within the Central West Orana Renewable Energy Zone. It is inconsistent with NSW Government renewable energy targets to continue expanding coal extraction in this region.

Issues not covered in the Environmental Impact Statement (EIS)

The EIS fails to address the following issues:

1. Job vacancies at Moolarben Mine

The current mining operations at Moolarben Mine are suffering from a labour shortage similar to all other sectors in NSW and Australia. There is no justification for the proposal to maintain a work force until 2038 when the current approvals already allow for this.

2. Water modelling and water balance for climate change scenarios

The Moolarben Coal Complex has demonstrated that water modelling has not sufficiently considered extreme wet weather events under climate change scenarios. The current exemption to the water discharge licence allowing for 65 ML/d of untreated mine water plus 20 ML/d of treated water to be released to the Goulburn River until 31 December 2022 as a result of an extreme wet weather event is a significant issue that has not been addressed. This circumstance demonstrates that the environment and community carry the cost of poor predictive modelling tools that are the basis of the decision-making process.

This proposal cannot be adequately considered for impact on water sources until the water modelling for Moolarben Mining Complex is updated and improved.

On the other hand, with more extreme drought conditions, the increased interception of fresh base flows to the Goulburn River is a significant regional impact with major environmental and social consequences.

3. Mapping of key springs - Groundwater Dependent Ecosystems (GDEs)

The area of impact of the proposal has a significant number of springs that provide freshwater baseflows to creeks and water access for wildlife during drought. They are a significant feature of the Moolarben Valley and have not been adequately mapped. The impact of the proposal on drawdown of these important GDEs has not been assessed.

4. Reference to cumulative impact on water sources

The cumulative drawdown and interception of water sources across the entire area of the Moolarben Mining Complex has not been clearly reported in the assessment. The impact of current operations on the health of the Goulburn River is significant.

5. Increase in Greenhouse Gas Emissions on mine site

Annual reporting on Greenhouse Gas Emissions at Moolarben Mine Complex demonstrates that:

- Cumulative Scope 1 and 2 emissions have increased year-on-year for the last 4 years in a row.
- Emissions intensity per tonne of ROM coal mined has increased year-on-year -for the last 3 years in a row.

There appears to be no attempt to improve Scope 1 and Scope 2 emissions associated with current mining operations.

6. Lack of specific Biodiversity Offsets

There is no indication of how the significant number of species and ecosystem credits will be gained through offsets. It is unacceptable for this detail to be left until after a decision is made.

Other key issues with the proposal assessment:

1. Inadequate buffer zones

The protection of important riparian zones on Moolarben and Murdering Creeks and the boundary of Munghorn Gap Nature Reserve need to be extended to 400 metres, within no mining activity within the zone.

Riparian zones are very important habitat that must be allowed to regenerate with appropriate management of weeds and invasive species. The construction of haul roads and other mining auxiliary works in riparian buffer zones is inappropriate.

The assessment has acknowledged that Munghorn Gap Nature Reserve will be impacted by increased noise, dust and light pollution. There is no monitoring of these impacts from existing mining operations. The proposal to have mine disturbance activities to within 1 metre of the reserve boundary is unacceptable and cannot be approved.

2. Cumulative impact on biodiversity

Each successive expansion of the Moolarben Mining Complex has caused a loss of high-quality bushland providing irreplaceable habitat for a significant number of threatened species. The ongoing loss of high conservation values cannot be

adequately offset and the assessment report fails to provide any detail on biodiversity offset arrangements.

The assessment has identified the need to offset a substantive number of credits: 15,624 ecosystem credits and 56,501 species credits. The proposal to clear another 477.75 ha of critically endangered Box-Gum Woodland is a significant additional loss of this ecological community from the region.

There is no reporting on the success of meeting credit arrangements on the existing offset properties managed by Moolarben Mine. There must be evidence provided that current offset arrangements are successfully allowing for an increase in threatened species populations before more habitat is approved to be destroyed.

The significance of the threatened species records in the proposed area of impact cannot be ignored. The loss of Koala habitat is unacceptable.

The biodiversity richness of the area of proposed impact is a strong case for its inclusion in an extension of the Munghorn Gap Nature Reserve.

3. Increased impact on natural flow patterns of the Goulburn River

The Goulburn River is unique in that it rises in the Central West climate and flows to the east to join the Hunter River. The key source of flows are from rainfall and groundwater baseflows.

Current mining operations at Moolarben Mining Complex combined with impacts from the adjacent Ulan and Wilpinjong Mines have a significant impact on the water sources and natural flow events in the Goulburn River.

The capture of rainfall runoff on the mine site and interception of baseflows has caused a significant reduction in natural flow patterns, especially during extreme drought events such as the recent 2018 – 2020 drought.

The discharge of mine water into the Goulburn River at a constant flow rate, when combined with large discharges from the Ulan Mine and downstream discharges from Wilpinjong Mine, has significantly altered the natural flow regime and impacted on the environmental health of the river system.

The proposal to intercept more rainfall and baseflows than already approved from the mine site will cause a cumulative decline in river health. The discharge of mine water during flood events causes higher flows than natural thus further impacting downstream landholders internal property access and public road access. These social impacts have not been assessed.

4. Increased Greenhouse Gas (GHG) Emissions

An increase in carbon emissions of 86.59 Mt CO₂-e cannot be supported.

The total annual NSW GHG emissions from our entire economy are projected to be 78.9–87.6 Mt CO₂-e in 2030.

This expansion proposal would add additional lifetime Scope 1 emissions of 600,000 t CO₂-e and Scope 2 emissions of 190,000 t CO₂-e to the NSW GHG inventory between 2025 and 2034.

The United Nations has told OECD countries including Australia that we must phase out coal by 2030 if the world is to avoid catastrophic climate change and major disruption to the economy.

This clearly means the NSW government should not be approving expansions of coal mining as proposed by this latest Moolarben development application, if there is any chance of keeping global temperature rise to below 1.5C.

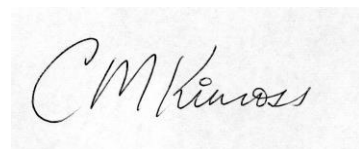
The Central West Orana Renewable Energy Zone is the first precinct established by the NSW Government to attempt to reverse NSW GHG emissions and to meet targets set to achieve a reduction.

The approval of coal mining expansion within the Renewable Energy Zone will counter any of the benefits from the proposed investment in energy sources that are carbon neutral.

Conclusion

There is no economic, social or environmental justification for the proposed expansion of Open Cut 3 to extend the Moolarben Mining Complex into a new area of impact.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cilla Kinross', is written over a light grey rectangular background.

Cilla Kinross
On behalf of Central West Environment Council