



# Nature Conservation Council

The voice for nature in NSW

Planning Assessment Commission

Level 3 201 Elizabeth Street

Sydney NSW 2000

12 April 2017

## **RE: Objection to Wilpinjong coal mine expansion**

To whom it may concern,

The Nature Conservation Council of NSW (NCC) is the peak environment organisation for New South Wales, representing over 150 member groups across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

As we have raised in our previous submissions to the proposal to expand the Wilpinjong coal mine, this project will cause significant social, ecological and Aboriginal cultural heritage harm.

This latest expansion proposal has been strongly opposed by the local community, including the local Aboriginal community and the broader community of NSW. Social impacts on remaining Wollar residents will be significant and have not been mitigated sufficiently by the current proposal.

### **Biodiversity impacts**

The PAC notes that “due to the significant amount of surface disturbance associated with the proposal” this mine expansion will impact threatened and endangered biodiversity.

Biodiversity threatened by this expansion includes:

- an endangered ecological community of Blakely’s Red Gum and Yellow Box Woodland;
- a threatened flora species called *Ozothamnus tessellatus*;
- up to 38 threatened fauna species;
- disturbance of 190 ha of critically endangered Regent Honeyeater habitat; and
- disturbance of 160 ha of Koala habitat.

The proposed biodiversity offsets do not meet current NSW policy. Loss of critically endangered habitat must be offset by like-for-like habitat and steps must be taken to identify and protect like-

for-like off sets before supplementary measures (paying into a fund) can be used. More than half the offset credits for the Wilpinjong Extension are on mine rehabilitation, which will result in worse biodiversity outcomes.

See our report *Paradise Lost*<sup>1</sup> for further details on the problems with the offsets scheme for major projects in NSW.

### **Social impacts**

The unacceptable social impacts of this project include:

- stranded assets,
- loss of connections in the village
- increased threat during natural and vehicle accident emergencies

There has also been no assessment of Low Frequency Noise (LFN) emissions from by Wilpinjong Mine (currently or after the proposed expansion), and no assessment of the effect of PM2.5 emissions on human health.

### **Cultural impacts**

Cultural heritage destruction on of the Rocky Hill Complex ochre quarry and art site will be significant. Two hundred and thirty indigenous cultural heritage sites will be impacted by this proposal. In Pit 8, three sites of “high significance” will be destroyed. These include a rock shelter with artefacts and art, a cultural area associated with the landscape features that comprise a visually prominent hill top situated in the valley floor, and a rock shelter with artefacts and an ochre quarry.

The Department of Planning has failed to implement a recommendation of the Review PAC to undertake further consultation with the local Aboriginal community:

*“that the Department, OEH and the Applicant take all reasonable steps to consult, and where possible reach an agreement with the local Aboriginal community as to the level of acceptable impacts on items of significance.”*

The local Aboriginal community objections have been ignored. In their Final Assessment Report, NSW Planning stated it had accepted all of the PAC’s recommendations where relevant “except for one about further consultation with the Aboriginal community”.

### **Final voids**

All final voids must be completely back-filled. The current proposal allows pits 2 and 6 to become saline lakes. We do not believe the formation of saline lakes is not an acceptable outcome. One responsibility of regulators is long-term custodianship of the land, yet they have allowed mining companies to leave a polluting and pockmarked landscape for future generations, with no assessment on the cumulative impacts.

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<sup>1</sup> [https://www.nature.org.au/media/265228/bio-offsetting-report\\_v14.pdf](https://www.nature.org.au/media/265228/bio-offsetting-report_v14.pdf)

## Climate Change

Climate change impacts from the production of more than 337Mt of CO<sub>2</sub>-e over the life of the project are too great and have not been adequately considered. In total, the mining of and combustion of coal mined at Wilpinjong will produce 348Mt CO<sub>2</sub>-e. This is significantly more than double an entire year's emissions for NSW (130Mt in 2014).

For the reasons listed above we oppose the Wilpinjong coal mine expansion and urge the Commission to reject it.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kate Smolski', with a large, sweeping flourish at the end.

Kate Smolski  
Chief Executive Officer  
Nature Conservation Council