Submission to the IPC to object to the Dendrobium Mine Extension.

As a practicing Veterinarian my focus is on the impact on wildlife.

The Environmental Impact Statement EIS, prepared by Niche for the multinational South 32, is large and contains data and charts divided into species. This is an effective way to individualise the impact on each separately and not reveal the interaction and interdependance of ecosystems within the area surveyed.

For this submission I will focus on the koala as it is such an iconic and much documented species. Just one of the vulnerable species identified.

The EIS assessment states the removal of a few low grade feed trees around a ventilator shaft will not affect the koalas. As we have seen exemplified during the last fire season, less desirable areas become much needed refuges and sources of food when the primary habitat is damaged. And the primary habitat will be impacted. There is planned clearing within the core koala habitat as well as along the transmission line. It is to be noted that there is no assessment done for threatened species along the transmission line.

The koala has been declared a vulnerable species. The claim within the EIS that a significant decline in the koala population will not occur has no data nor any grounding. What qualification has been used to assess what is significant when dealing with a vulnerable species? Clearing of core habitat has to impact the population. It was because of the vulnerability of the Koala that the NSW government carried out a review into Koala population and habitat in June 2020. It’s recommendation 17 asked for urgent planning protection of koala habitat, this surely denies clearing of core habitat.

Recommendation 11 asked for Climate Change to be factored into planning and legislation. To ensure climate change mitigation be a core component of all strategies to save the koala. Approving new fossil fuel production is not in line with climate change action.

Recommendation 37 asks for the removal of the ability of mining companies to delay offsets until project completion yet there is no documentation of offsets within the application. In fact there is no ability to offset core Koala habitat as it is by nature all occupied. All core koala habitat “like for like” is occupied.

The draining of 25 of the 46 upland swamps will have many impacts on the surrounding area. You cannot dry up a swamp and not have affected the hydration of surface and ground water and the role of purification of the water. There will be increased fire risk (greater need for refuge areas such as the trees cleared from near the ventilator), increased pollution including heavy metals, decreased oxygenation, and increased ambient temperatures, again increasing fire risk. The flora and fauna that lived there are inherent parts of the surroundings, changing this has flow on effects for example when the frogs and reptiles die there will be an impact on the insects that move from one area to another.

The assessment for managing this one vulnerable species is deeply flawed with regards to the nature of ecosystems. Koalas are one component of an ecosystem that has been untouched for so many years. When the true ecosystem from aquatic stygofauna, pollinating insects to the larger species such as the koala is looked at in it’s entire complexity together this EIS is inadequate. The EIS assesses 33 vulnerable, 10 endangered and 2 critically endangered species all in an equally seperated manner. It is the cumulative effect and associated snowball reaction that cannot be afforded to be started. In this EIS the bigger picture is never stated, it is lost

All this is within a Special Area. An area that has existed since 1880 with the purpose of protecting the supply of drinking water. As a bush walker I am not allowed to enter. To allow a coal mine there is to make a mockery of the purpose of the Special Area. That there are still some oasis of ecosystem existing there should be celebrated and protected, not risked for a short time of fossil fuel production.

The citizens of greater Sydney will be the silent payers for the project if it goes ahead. They will pay by loss of water. They will pay though government subsidy to the fossil fuel industry from their taxes, use of tax paid roads worn down, pollution of air and water, increased public health costs. All this when the population overwhelmingly wants a fair transition to green energy. The later this transition starts the more costly it will be.