

Project : **Wilpinjong Extension Project (SSD 6764)**

Name : **Chris Pavich**

Email Address : [REDACTED]

Address : **16 Carolina Crescent, Mudgee NSW 2850**

- PAC may publish my name and location in the list of submissions
- The reason for my submission : **Objecting**

Relevant Personal Qualifications:

- Graduated with an Earth Sciences BA degree from Macquarie University in 1973
- Worked in 1979 as an Engineering Geologist in Yorkshire coalfields and other northern UK sites
- As an NPWS Ranger from 1981 to 2011 worked adjacent to and liaised with coalfields operators in the Illawarra, Royal, Yengo and Wollemi – Goulburn River – Munghorn Gap regions
- Resident in the Mudgee area since 1991
- Member of Ulan Mine Community Consultative Committee since 2011
- Member of other local groups including Friends of Putta Bucca Wetlands committee, Rylstone District Environment Society, Rylstone District Historic Society, and Mudgee District Environment Group.

Submission :

Good morning First Nation representatives, Commission members, Ladies and Gentlemen.

My primary objections to the proposed Wilpinjong Extension Project relate to **biodiversity impacts, biodiversity offsets, and final voids.**

Biodiversity Impacts

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

Rehabilitated mine site lands lack the very diverse species assemblages found in mature ecosystems. Missing from these simplified mine rehab sites are

- Well-developed soils with a diverse range of bacteria, fungi, algae, protozoa, invertebrates, and many other elements of the web of life found at the base of the food chain in mature ecosystems
- These and other groups of lifeforms should make up the bulk of the soil biomass, and are the essential base to ensure long-term ecosystem sustainability
- Soil profile development on rocky mine waste requires centuries or much longer, unlike the soils that may develop on alluvium or colluvium
- The majority of Australian soils have been developing for many millennia
- Consequently the value of original landscape elements must be recognised and protected to retain healthy sustainable ecosystems
- Consequently open-cut mining must be limited to as small a footprint as possible

Biodiversity threatened by this expansion includes:

- an endangered ecological community (EEC) of Blakely's Red Gum and Yellow Box Woodland
- a threatened flora species - *Ozothamnus tessellatus*
- Up to 38 threatened fauna species, including via disturbance of 190 ha of critically endangered Regent Honeyeater habitat, and 160 ha of potential Koala habitat.
- Although Vulnerable or Endangered Mallee Fowl, Regent Honeyeaters, Spotted-tail Quolls, Koala, and Brush-tailed Rock Wallaby were not recorded in the brief surveys associated with this project, they have been recorded and/or seen nearby and are probably or possibly also present
- Over recent years more effective community goat, pig, fox and dog control programs elsewhere in the region have promoted population increases in some or all of the above and other native species
- Coal mining expansion may negate these improvements by reducing prime habitat extent and replacing such mature sites with rehabilitated lands of significantly lower habitat complexity and value
- Rehabilitated open-cut mine sites are unable to support the viable sizeable and diverse populations of the above ecosystem members that existed earlier.

Buffer zones around the perimeters of Munghorn Gap Nature Reserve and other uncleared hill areas must be adequate in size to support the diverse range of birds and mammals that would feed there. Many mammals shelter by day in forests and woodlands of the Reserve and other hills, and come out to feed in the footslope grasslands at night.

Ask any grazier. They will tell you of the wombats, wallabies and kangaroos, even some birds such as owls and nightjars, which come out after sunset to do most of their feeding in their grassy paddocks. More of other birds do the opposite. Magpies, kookaburras, cockatoos and corellas, ibis and egrets, and many other species – they will roost at night in the Reserve or other hill areas, and feed in the paddocks by day.

Wilpinjong's open cut mine pits as close as possible to the Reserve perimeter and other forest areas will lead to much reduced amounts of available feed. Consequently population losses of all these creatures may be expected. Forest and woodland corridors linking Goulburn River National Park and Munghorn Gap Nature Reserve and other forested hill areas will certainly reduce the problems of "island" communities. But ecotone forest/grassland interface opportunities provided by substantial mine site buffers are essential to sustain many animal and other species.

Using narrow buffers as utility corridors, with roads, conveyors, cleared firebreaks, waterway structures, and other infrastructure contradicts the purpose for which they were designed, and must not be established there.

Biodiversity Offsets

The proposed biodiversity offsets do not meet current NSW policy:

- Loss of critically endangered habitat must be offset with "like-for-like" – the biodiversity offset land's habitats must be local and house diverse mature sustainable ecosystems that mirror the habitats the mining activity destroys

- Steps must be taken to find like-for-like offsets before supplementary measures (paying into a fund) can be used – this must be a very last resort option, if at all
- More than half the offset credits for the Wilpinjong Extension are on 2, 906 ha of mine rehabilitation lands – untested and highly uncertain biodiversity outcomes
- As alluded to above, relatively recently rehabilitated open-cut mining lands cannot replicate the mature ecosystems that in many places preceded the expansion of mining.
- All destruction of our mature ecosystems is a net loss to the Australian environment – biodiversity offset lands are not new additions to the environment.

Final Voids

I support the recommendation of the Department that there should be no final void left in the proposed new pit. Additionally, should the project be approved, PAC and the DPE should require the proponent to backfill the voids in the currently approved pits, in line with community expectations and world's best practice mining rehabilitation.

All final voids must be completely backfilled. Peabody Energy initially reneged on US\$2.7bn worth of rehabilitation commitments in the USA, leading to (now suspended) section 11 bankruptcy. Such failings cannot be repeated here in Australia.

The current proposal allows pits 2 and 6 to become saline lakes. The formation of saline lakes is not an acceptable outcome. Regulatory failure leaves an expensive mess for future generations. Peabody and all other mining companies must develop at their own expense alternative environmentally friendly final solutions to long-term groundwater salinity and acidity issues.

One responsibility of regulators is long-term custodianship of our land. Allowing mining companies to leave a polluting and pockmarked landscape for future generations to repair is not the legacy appropriate for our children.

Finally

I thank members of the Commission and all other listeners for your interest and concern regarding low-impact mining options. I am sure you understand our obligation to ensure our children's children are left with a diverse and sustainable environment in which to live and prosper.