

22nd February 2022

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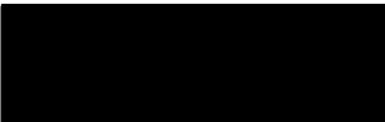
Re: Narrabri Underground Mine Stage 3 Expansion Project (SD 10269)

Dear Sir/Madam,

Please find enclosed my submission to the Independent Planning Commission on the matter of the Narrabri Underground Mine Stage 3 Expansion Project (SD 10269).

I would like to state here that I object to the Narrabri Underground Mine Stage 3 Expansion Project and urge the Independent Planning Commission to reject it.

For the only planet we have.



Marjorie E. Martin

ADMISSION

Narrabri Underground Mine Stage 3 Expansion Project (SD 10269)

Dear PROFESSOR MARY O'Kane AC, PROFESSOR SNOW BARTON and PROFESSOR CHRIS PELL AC

I **OBJECT** to this mine expansion and urge the Independent Planning Commission (IPC) to refuse it.

Groundwater is a major resource in the Pilliga region. Farmers rely on bores to water their stock and residents use the water carried by the Naomi River. The Whitehaven Coal mine expansion will have a profound effect on groundwater. At least nine bores will be affected by the groundwater drawdown that is worse than the impact criteria of NSW's Aquifer Interference policy. But the actual number could be far greater. This project is directly next door to Santos' proposed CSG which will also remove and disrupt groundwater. The combined withdrawal of water by both these projects will greatly impact the availability of water in the region. These impacts will continue for at least a century, peaking well after the mine has already closed. The drawdown will also affect the contribution of groundwater baseflow into the Naomi River itself. This is a crucial source of water for both people and farmers in times of low rainfall. The region is subject to drought and has only recently emerged from a devastating dry period. This must also be factored into the management of the region's water resources. Due to the massive cumulative impact the expansion will have on water resources in the region the IPC must not grant expansion approval to Whitehaven Coal.

The eastern Pilliga forest is a unique and irreplaceable biodiversity refuge. The expansion project will clear 440 hectares of woodland and fragment a much larger area. It is home to many threatened species including the Glossy Black Cockatoo, Eastern pygmy possum, Squirrel glider, Black-striped wallaby and the Pilliga Mouse. The survival of many of these species requires large mature trees where hollows have formed. These hollows are being lost to clearing. The expansion is a longwall mine. The proposed new long walls are some of the longest and widest in Australia. This will generate intense surface subsidence after the longwall panel collapse post-mining, disruption of creek flow, withdrawal of water from mature trees in the Pilliga East forest and the creation of cracks up to 78cm wide and 2.5m deep. In addition to the clearing there are 160 hectares of high priority groundwater dependent ecosystems that will experience ground drawdown. Whitehaven Coal admitted in its response to submissions that *"At some groundwater dependent vegetation, predicted drawdown exceeds 10m which is expected to result in larger trees potentially not being able to access groundwater in drought conditions."* The extinction rate is a major problem in Australia. Considering the number of species already endangered plus those mentioned in the Pilliga and the disruption this expansion will cause to the surrounding environs the IPC must reject Whitehaven Coal request for expansion.

Whitehaven Coal's consultants surveyed the local community for the preparation of an impact assessment for this expansion. The results were damning. 95% of the local people disagreed that Whitehaven Coal was a good neighbour, 90% disagreed that Whitehaven listens to and responds to community concerns and 82% disagreed that Whitehaven would contribute to their community and care about their region. The local community is reeling from the social impacts of Whitehaven Coal's coal mines and made it perfectly clear to the company that the project is too damaging and should not proceed. If the mine expansion does proceed and local farms lose their water there will be further disruption to agriculture in the district. By one local estimate over 70 local farms have so far disappeared as a result of Whitehaven Coal's coal mining operations. Australia is an arid land. We only have so much land available to us for farming. I object to fertile farming land once again being destroyed for a coal mine. This fertile land will be lost forever. These actions reduce the amount of farming land the country has available to grow food needed by the Australian population. This coal mine expansion is damaging to social cohesion, the natural environment and the future of the region. The IPC must reject the mine expansion to preserve the productive farmland, protect significant areas of the Pilliga forest, protect the mentioned threatened species which call this forest home and the affected environs impacted by mining operations.

The Narrabri Underground expansion will add another 13 years to the mine's life, extending it until 2044. An extra 100 million tonnes of predominantly thermal coal will be mined. 34 million tonnes of greenhouse gases will be released locally and a further 456 million tonnes when the coal is burnt. The New South Wales government has announced it will be net zero by 2050. How is that even possible when the emissions caused by this expansion are taken

no account. The New South Wales government claims it is on track to achieve net zero by 2050. Yet its Future of Coal statement outlines that during the global transition away from fossil fuels it "will continue to support the responsible development of our abundant, high-quality coal resources for the benefit of the state." Clearly there is a disconnect between what the New South Wales government hopes to achieve by 2050 and the manner in which it will achieve that goal. Investment by the New South Wales government in green energy generation and infrastructure will have major impact and will also be for the benefit of the state. The IPC must reject the Whitehaven Coal mine expansion to assist the New South Wales government in achieving its goal of being net zero by 2050. The Planning Department's Assessment Report candidly admitted that New South Wales has no coherent policy to consider and determine the acceptable impact of new coal mining projects on climate change. This is a further reason for the IPC to stop this expansion from proceeding.

The importance of the Pilliga and its creeks for the Gomeroi people is reflected in the large number of artefacts found, many of which are clustered along the Kurrajong Creek. Among the 60 sites already recorded are two grinding groove sites. One of these grinding groove sites has several dozen grooves and is well-preserved. Whitehaven Coal's assessment considered it likely this site would be affected by subsidence. Whitehaven Coal and the Planning Department have given minimal consideration to the potential damage to the grinding grooves and the protection of Gomeroi cultural heritage. These sites will be affected by subsidence caused by movement, water extraction and coal extraction from below them. Rio Tinto subjected itself to worldwide outrage after it dynamited the caves in the Juukan Gorge. And this despite verified evidence of occupation for more than 40,000 years. This was a significant blow to both Aboriginal and Australian history. One would think that Aboriginal heritage would never again be so thoughtlessly destroyed but it would appear that mining companies have not learned their lessons. Whitehaven Coal admits it has given minimal consideration to any possible damage to Aboriginal artifacts on site. Australians everywhere will fight for our First Nations' right to have their way of life left undisturbed. The IPC must reject the expansion as it directly affects cultural values of Gomeroi Country.

It would be remiss of me while writing this objection to overlook the manner in which Whitehaven Coal conducts itself while doing business. Whitehaven Coal and its many subsidiary companies are repeat offenders who break the law without concern for the impacts it creates on water resources, the environment or affected communities. In the last 10 years Whitehaven Coal has been found guilty or investigated for breaches of the law on 35 occasions, many of them including multiple offences. They have been prosecuted numerous times and have incurred \$1,497,500 in penalties to date. Offences include stealing 1 billion litres of water without a licence during the worst drought on record at the Maules Creek Coal mine, polluting waterways, breaching noise constraints, clearing illegally and serious workplace health and safety failures. The company has no coherent climate change policy. This is a damning trait in the world's current environmental situation. The manner in which a company operates should also be a matter the IPC reviews before issuing a permit or permission. In the light of Whitehaven Coal's past actions, the IPC must disallow the expansion in this case. Whitehaven Coal's shameful record is evidence that they are not fit and proper to hold a licence to operate coal mines in New South Wales.

While all the above-mentioned reasons are valid and should be sufficient to have the expansion rejected, there is another greater reason which in and of itself should be enough to end this application - climate change.

The expansion will make the Narrabri Underground mine the second most polluting coal mine in New South Wales in terms of direct and indirect greenhouse gas emissions. Emissions will triple, mostly as a result of methane being venting by the mine. As you are aware methane has a global heating impact 84 times greater than that of carbon dioxide in the short term. Reducing methane emissions is crucial to preventing global warming from breaching 1.5 to 2 degrees over the next 20 years.

The Planning Department admits that it has no clear idea about whether it is possible for Whitehaven to mitigate and reduce the methane emissions from the mine once digging has commenced. Approval of this project would run directly counter to New South Wales targets of 50% reduction in emissions by 2030 and net zero emissions by 2050, a point that I raised earlier in this submission. Whitehaven Coal has also applied a flawed economic model in its expansion modelling. When the proper economic impacts of the direct greenhouse emissions from the mine are properly considered, the net economic benefit is negative.

The climate crisis is an existential threat to New South Wales, to the whole of Australia and the world. The federal government's stand on climate change is not only embarrassing for all Australians but it is turning the country into a pariah internationally. Australia is particularly vulnerable to climate change. Average temperature rises have been higher here.

The International Energy Agency was very clear in its 2021 landmark report. To hold global warming at 1.5 degrees they explicitly excluded the development of new coal, oil and fossil gas reserves. In other words, no credible path to 1.5 degrees exists without an immediate halt to the development of new coal mines. All coal mining must stop. Australia does not need fossil fuels when green energy is bountiful and storage methods are rapidly improving.

Reject the Narrabri Underground Mine Stage 3 Expansion Project. No new coal releases in New South Wales.

For the only planet we have.