

From: [Stephen Drew](#)
To: [IPCN Enquiries Mailbox](#)
Subject: Submission against the Narrabri Underground Mine Stage 3 Extension Project
Date: Tuesday, 22 February 2022 8:08:29 AM

Dear Panel Members,

I oppose Whitehaven Coal's application for a huge new expansion of its Narrabri coal mine and ask that you consider the following concerns when making your decision please?

My concerns are:

1. Groundwater

- At least nine bores which are crucial for watering stock will be affected by groundwater drawdown that is worse than the impact criteria of NSW's Aquifer Interference Policy.
- This number could be far higher, particularly since the project is directly next door to Santos' proposed CSG, which is also going to remove and disrupt groundwater.
- These impacts will continue for at least a century, peaking well after the mine has closed.
- The drawdown will affect the contribution of groundwater 'baseflow' into the Namoi River itself, a crucial source of water in times of low rainfall.

2. 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 venting. In the short term, methane has a global heating impact 84 times that of carbon dioxide.
- Reducing methane emissions is crucial to prevent global warming breaching 1.5 degrees or even 2 degrees over the next two decades.
- The Department admits that it has no clear idea about whether it is possible for Whitehaven to mitigate and reduce the methane emissions from this coal mine once mining has begun.
- Approving this project would run directly counter to NSW targets of 50% reduction in emissions by 2030 and net zero emissions by 2050.
- Whitehaven has applied a flawed economic model. If the proper economic impacts of the direct greenhouse emissions from this mine are properly considered, the net economic benefit is negative.

3. Biodiversity

- The eastern Pilliga forest is a unique and irreplaceable biodiversity refuge. The Stage 3 project will clear 440 hectares of woodland and fragment a much larger area.
- The area is home to many threatened species including the Glossy Black Cockatoo, Eastern pygmy possum, Squirrel glider, Black-striped wallaby and Pilliga Mouse.
- The survival of many of these species requires large mature trees where hollows have formed and these will be lost to clearing.
- Narrabri is a longwall mine, and the proposed new longwalls are some of the longest and widest in Australia. This means intense surface subsidence after the longwall panel collapse post-mining, disrupting creek flow, withdrawing water from mature trees in Pilliga East forest and creating cracks up to 78cm wide and 2.5m deep.
- In addition to the clearing, there are 160 hectares high priority groundwater dependent ecosystems that will experience groundwater drawdown. Whitehaven 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."

4. Social impacts

- Whitehaven's consultants surveyed the local community for the preparation of the social impact assessment of this project, and the results were damning.
- The vast majority of locals see Whitehaven as a poor neighbour and coal mining as damaging to social cohesion, the natural environment and the future of the region.
- If the mine expansion proceeds and local farms lose water, there will be further disruption of agriculture in the district. One local estimated that around 70 local farms have so far disappeared as a result of Whitehaven's coal mining operations.

5. Gomeroi Cultural Heritage

- The importance of the Pilliga and its creeks for Gomeroi people is reflected in the large number of artefacts found, many of which are clustered along Kurrajong Creek.
- Among the 60 sites recorded are two grinding grooves sites and one of these grinding groove sites has several dozen grooves and is well-preserved. Whitehaven's assessment considered it likely this site would be affected by subsidence.
- These cultural heritage sites will be affected by cracking and subsidence caused by movement, water extraction and coal extraction from below them.
- Whitehaven and the Department gave minimal consideration to the potential damage to grinding grooves and the protection of Gomeroi cultural heritage.

Thank you for your time. Our environment should be protected no matter how much money is involved as it is irreplaceable!

Yours faithfully,
Teressa Drew