

Narrabri Underground Coal Mine Stage 3 Extension (SSD 10269)

I OBJECT TO THIS MINE EXPANSION.

1. General Comments

I write from Sydney where I reside. I am indirectly affected by all extraction of coal in NSW (and other fossil fuels) due to the cumulative effects on the climate, biodiversity, on the collective health of all of us, on the liveability of the country – and the planet.

As members of the IPC are all aware, the recent report by the IPCC of 2021 noted, inter alia, that:

“There is a narrow path to avoiding climate catastrophe, but only through immediate, deep and sustained emissions reductions. Climate change is already wreaking havoc around the world, with worse to come. Our decisions this decade will be the difference between a liveable future for today’s young people, and a future that is incompatible with well-functioning human societies....” (as discussed in the Climate Council report 2021: <https://www.climatecouncil.org.au/resources/what-does-ipcc-latest-report-mean>)

Moreover, the International Energy Agency (IEA) emphatically stated in 2021 that exploitation and development of new oil and gas fields must stop (in 2021!) **and no new coal-fired power stations** can be built if the world is to stay within safe limits of global heating and meet the goal of net zero emissions by 2050 ([Net Zero by 2050 – Analysis - IEA](#)).

In light of these reports and recent court judgements (notably [Sharma by her litigation representative Sister Marie Brigid Arthur v Minister for the Environment \[2021\] FCA 560 \(fedcourt.gov.au\)](#) regarding the Vickery Coal Mine, I do not understand why this current proposal was not referred to the Land and Environment Court in the first instance to be subjected to legal scrutiny. I am therefore led to the conclusion there are corrupted processes in the Department of Planning’s decision-making. It is reprehensible that the NSW Government has approved this project.

Coal mining relies on buyers. Who will they be as world markets turn increasingly to renewable sources? What if traditional buyers choose not to buy our coal in the very near future causing stranded assets? And meantime the current Whitehaven operations have already negatively impacted on aquifers, air and soil and hence the livelihoods of farmers and graziers – whose healthy and reliable produce we ALL rely on.

I believe the IPC must also take into account Whitehaven’s own record of surface water theft and associated fines for this – eg at Maules Creek. Restricting evidence from previous breaches by Whitehaven bespeaks attempts to confine legitimate opposition. (<https://www.theguardian.com/australia-news/2021/nov/25/>).

2. Specific comments relating to Whitehaven’s proposed expansion

2.1 Impacts on water sources – groundwater

The Department’s own report noted that the Mining Panel

*‘...raised some concerns over the model’s ability to predict with sufficient certainty impacts on *small features of interest* (my emphasis) at some distance from the mine, such as springs, groundwater bores and groundwater dependent ecosystems. It addressed these uncertainties through recommendations for additional monitoring and the potential for more regular updates of the groundwater model, while recognising that: “... for the purposes of the EIS, the ability to*

predict all local impacts is not essential and that matching spatial and temporal trends is probably sufficient. This has been accepted by the Panel in assessing the model's applicability as an assessment tool for mining approval"'. (Page viii)

The minimising and underestimating of concerns by the Mining Panel about likely impacts on springs, groundwater bores and groundwater-dependent ecosystems is astounding when it is known that these sources are already in delicate balance.

At least nine farm bores crucial for watering stock would be affected by groundwater drawdown. As the proposed extension is adjacent to the proposed Santos CSG extractions, the number of affected bores could be greater. Underground bores do not recognise the distinction between differently categorised and numbered mining projects. The geology is far more complex and more tenuous. If this mine extension is permitted, its effects on groundwater even at completion would continue – especially as the drawdown would affect the contribution of groundwater 'baseflow' into the Namoi river which is a crucial source of water in times of drought and general low rainfall.

Furthermore, the availability of water would almost certainly be reduced for sections of the Pilliga Forest – itself already under threat by current mining associated activity.

2.2 Greenhouse Gas Emissions

If this extension is permitted it would become the second most polluting mine in NSW for direct and indirect greenhouse emissions – ie Scope 1, 2 and 3. Paradoxical to the Department of Planning's approval of this project, it is inconsistent with the NSW Government's own emission reduction targets for 2030 and 2050. What must also be taken into consideration for this project extension are the cumulative effects of all the nearby extraction projects in the Sydney-Gunnedah Basin and the approved Santos CSG extractive project.

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. The Department of Planning 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. Whitehaven has applied a flawed economic model. If the proper economic impacts of the direct greenhouse gas emissions from this mine are thoroughly considered, the net economic benefits are negative.

2.3 Biodiversity

The Eastern Pilliga Forest is a unique and irreplaceable biodiversity refuge. The Stage 3 project would 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 over many decades or longer. These would 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". If they are prepared to admit this, what are they not prepared to acknowledge will occur following further intrusions into the area?

2.4 Economic Costs and Benefits - the claims of job creation with this proposal in the local area

While it is understandable some local residents see further mine expansions as a continuing source of work (in associated businesses as well as the mine sites), this is short-sighted. Increasingly higher rates of automation across the coal mining industry are already reducing direct jobs available.

If the mine is extended and the negative impacts continue to wreck the local environment (and beyond), what is the point of short-lived/temporary jobs? Some local residents claim the mine will bring new residents, especially young families, to the area and will sustain those already there. However, as worldwide demand for coal declines and alternative energy sources - particularly renewable - take its place, job growth in coal-related areas will decline giving false hope to the local community and region. The recent announcement by Origin Energy of the imminent closure of the Erarang Power Station in the Hunter Valley is but one portent. So too is Atlassian/Brookfield's current offer to take over AGL Energy to accelerate the closure of AGL's major coal-fired power stations.

Given the above, I believe the assumptions contained within the Department's own figures and predictions and the cost-benefit analysis are at the very least optimistic and generally quite slippery.

2.5 Social costs and benefits - impacts of the existing Whitehaven mine and recent survey results

I refer to Section 3, *Stakeholder Engagement* of Whitehaven's own report pp 14/15/16 (Community Survey/Social Impacts) 3.4.12. Notwithstanding the stated limited methodology of the survey conducted with only 81 respondents, it is remarkable the responses to the various elements of the survey were in the main negative about the impacts of this proposed project extension in all fields surveyed including water, climate change impacts and community cohesion. These results fly in the face of proclaimed benefits of the extension of this already demonstrated damaging project.

Specifically worth noting were the respondents' observations that mining was changing the region from a predominantly agricultural area to include mining and changing the local sense of place. Furthermore, "Most local respondents disagreed with the statement that community opinion is considered in decision making (78%). Additional respondent comments suggest that this was related to both a lack of input into decision-making of both government and mining proponents". This finding is in line with an overall lack of genuine consultation with local communities regarding intrusive and damaging extractive mining operations. It is totally unacceptable.

The local/regional community is already reeling from the social impacts of Whitehaven's coal mine activities and yet almost inexplicably the Department of Planning supports this mine extension proposal.

3. Summary and Conclusion

In light of the alarming impacts of coal mining emissions on the environment - increasing droughts, fires and floods - there is clearly no room for any new (or extended) fossil fuel projects, notably this one, if Australia is to limit global warming to 1.5°C or reduce emissions to net zero by 2050.

Whitehaven is a persistent law breaker and this leads to the conclusion that their claims for safe and lawful operations for the mine extension cannot be trusted. The IPC **must** take this into account when making its decision on the current proposal.

By any measure this proposed mine extension is not in the interests of intergenerational equity, water rights, clean agriculture, biodiversity preservation and climate protection.

THIS APPLICATION SHOULD BE REFUSED IN ITS ENTIRETY WITH NO CONDITIONS.

**Adrienne Shilling
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