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To: [IPCN Enquiries Mailbox](#)
Subject: RE: Narrabri Underground Stage 3
Date: Wednesday, 23 February 2022 10:14:22 PM

Dear NSW Independent Planning Commission

Submission guide: Narrabri Underground Stage 3

Whitehaven Coal is seeking approval from the Independent Planning Commission for a huge new expansion of its Narrabri coal mine.

The Commission is accepting submissions now and the local community needs your back-up.

Lodge your submission here:

<https://www.ipcn.nsw.gov.au/have-your-say?project=32bf6906-1c50-4915-ba46-1ae160e57da6>

About the project

The expansion proposal will:

- Extend the Narrabri Underground mine for another 13 years, to 2044, and mine an extra

~100 million tonnes of predominantly thermal coal;

- Release 34 million tonnes of greenhouse gases locally and a further 456 million tonnes

when the coal is burnt;

- Affect both productive farmland and significant areas of the Pilliga forest which is home

to many threatened species;

- Directly affect cultural values on Gomeroi country;

- Adjoin the Narrabri CSG project leading to massive cumulative impacts if both proceed.

The big issues

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.

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.

I am an ex-resident of Boggabri, NSW and visit regularly. I've watched the changes and thus far it has not been perfect, but it has been good for the area in general.

However, I'd hate to see ALL the good turn to RUBUSH over this issue. I KNOW a better solution can and should be taken.

Please STOP this before it is too LATE!!!

Dusty Lindsay



- 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.

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.”

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.

Gomeri Cultural Heritage

- The importance of the Pilliga and its creeks for Gomeri 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 Gomeri cultural heritage.