

To the Independent Planning Commission  
A Submission **Opposed** to Whitehaven Stage 3 Proposal.  
From Stuart Murray

### Opening statement

I am Stuart Murray, a retired Agronomist now cattle farmer, and unfortunately have the Whitehaven underground mine extension as my neighbour, while another one third of my property is covered by their mining leases.

**See map attached** with my property highlighted. The **X** is where our cottage is.

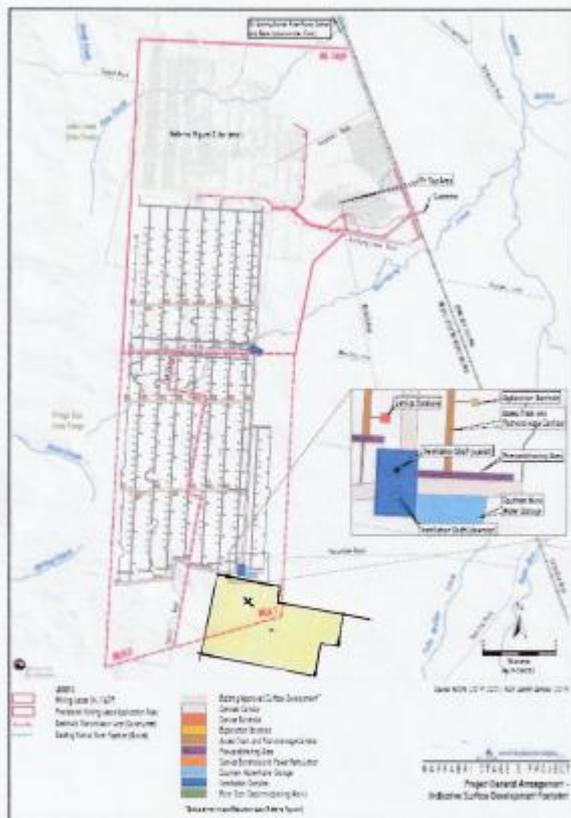


Figure 3 | Project Indicative Surface Development Footprint (Source: Amendment Report)

Starvation Underground Mine  
Stage 3 Extension Project (1500 102000) | Assessment Report

My wife and I are self-funded retirees and purchased our property in 1995 to help fund our retirement. We were looking for a property that could provide some income, peace and quiet and stimulation for as long as we are capable to manage it. For 27 years this has been an important part of our life.

Having Whitehaven as a neighbour is particularly galling as we are still reeling from the extended drought and we are now locked into dealing with climate change to which Whitehaven, as part of the fossil fuel industry, is partly to blame. Add to this the fact they plan to construct 'extensive ventilation infrastructure' next to our boundary and approximately 800 m from our cottage is another kick in the guts we do not need. It is going to make our place unliveable and difficult if not impossible to sell.

The noise from ventilation shafts has been described as living next to a jet engine that runs 24 hours a day

so, it will be impossible to stay at our property. We note that on page 6 of the Assessment Report that, *'the exact locations of surface infrastructure would be subject to further detailed mine planning, to minimise impacts'*. As I can hear the coal trains at night that are 7 km from our property, and the ventilation infrastructure is noisier and runs 24 hours a day, then it is obvious that it will have to be located a lot further away than 800 m.

**Example** of ventilation infrastructure.



**Plate 2-4 Existing Upcast Ventilation Infrastructure**

If you live in town and it's not OK to have a barking dog next door, then it's not OK to have the noise of ventilation infrastructure next door.

On page 78 Table 12 are the findings on the noise issues.

They confirm that *'two additional large ventilation shafts would need to be constructed and operated , as would the Southern Mine Water Storage'*. One of these including the Southern Mine Water Storage is next to our property boundary about 800 m from our cottage, as shown on the map above.

*At the bottom of this page it states that 'Whitehaven has advised (the Department of Planning) it has entered into private agreements with the owners of (two receivers 670a and 675a) both these residences such that they would accept these exceedances'.*

I do not know who the two receivers 670a and 675a are, but I do know that my property and my neighbour Garry Martin are the two closest residences to this infrastructure and neither of us have come to any agreement. I have never been approached.

It appears that Whitehaven have deceived the Department of Planning and indirectly the IPC.

On top of this there will be more traffic, dust, light pollution, and a potential negative impact on our cattle. We have a stock watering dam close to the ventilation infrastructure and the southern mine water storage. This dam dried up during the drought and was deepened in order to cope with the impact of climate change. This dam's value to us will possibly be compromised due to reduced inflow, because of the proximity of the infrastructure and subsidence interrupting surface water flow, siltation, and possible contamination from the southern mine water storage. Our property relies entirely on surface water stored in our dams. We have contemplated putting in a bore to supplement the dams during droughts however we believe this is not an option now as, being a neighbour, the mine extension would impact this bore.

My first encounter with Whitehaven was in 2007 when they failed to honour parts of their access agreement with us, which was the start of an exponential growth in my lack of trust in fossil fuel companies, and that was coming off an already high base. Whitehaven have been branded a “*rogue operator*” (Ref Northern Daily Leader) and had something like 63 breaches of their approval conditions when the Independent Environmental Audit was undertaken in 2015. I have a list of another 24 non-compliances Whitehaven have racked up since 2012, some with pending outcomes. Of these, 7 are attributed to Whitehaven’s underground mine proposal.

Yet the Department of Planning has the hide to state on page 7 of the Executive Summary that:

*‘the mine has been operating for over a decade with a range of measures to control or reduce impacts (with no major issues or complaints).*

This is obviously not true.

With this track record you would have to be dreaming if you think Whitehaven will comply with all the ‘*strong conditions*’ that may be applied if the project is approved.

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Resource companies are notorious for exaggerating the benefits and downplaying the negatives of their proposed projects, and Whitehaven is guilty of this.

For this reason, anything they claim as a reason that justifies approval should be treated with absolute suspicion.

Examples

At Boggabri, when submissions to the Vickery extension EIS were being presented, Paul Flynn the CEO of Whitehaven Coal, twice claimed the project was sustainable. Coal mining does not have the ability to meet the needs of the present without compromising the ability of future generations to meet their own needs.

**Therefore, by definition this project is not sustainable.**

Paul Flynn again used the word sustainable in his presentation to the IPC on Monday 14th February 2022.

On a similar theme:

The definition of Intergenerational Equity as described on page A5 requires that *‘the present generation should ensure that the health, diversity and productivity of the environmental are maintained or enhanced for the benefit of future generations’*.

The Department considers that *‘the project does not conflict with the principle of intergenerational equity’* and in fact claim, *‘it would be maintained or enhanced’*.

### **Pull the other leg**

The Department admits the scope 1 and scope 2 emissions are significant and trot out the too small to matter argument: these emissions, *‘constitute a very small contribution towards climate change at both the national and global scale’*. **More on this later**

If this project is approved it will be the dirtiest thermal coal mine in Australia and they discuss at length in other parts of the Assessment report that *'the opportunities to minimise fugitive emissions are limited at this stage'* and that they may be able to *'ratchet down'* fugitive emissions by 1% over time.

If this mine is not going to have net zero emissions and unlikely to manage a 1% reduction then this project is contrary to intergenerational equity and certainly will not enhance it.

Whitehaven Coal have admitted the stage 3 extension will adversely impact several bores which are essential for many farming businesses in the area, downplaying the impact by claiming this water *'is not used for agriculture'* which is untrue. This quote is contained in a handout provided at a Public Information Session at Baan Baa, 28/11/2020.

This led to a subsequent meeting 24/2/2021 between the Department of Planning and affected landholders where the Department reluctantly admitted the EIS was deficient and contained significant omissions, particularly with respect to the impact on underground water that property owners rely on. Apparently, Whitehaven have since committed to *'make good measures'* in respect to these bores. However, the *'Department has recommended conditions requiring Whitehaven to use its "best endeavours" to finalise make good agreements with owners of these bores, within two years of commencing development under any consent granted for the Project'*.

The Department are kidding if they think this is a *'strong condition.'*

The Departments Assessment Report should not have recommended the project as approvable until an agreement that is acceptable to the owners of the bores has been made.

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**Why are we in such a mess?** In 1989 the Weekend Australian reported that *'some such as coal and oil lobbies push for policies that accelerate global warming'*.

I still have a hard copy of an article published in The Weekend Australian April 1-2 1989 (Murdoch Press even then) with the headline **World At Risk: Catastrophic climate change, environmental destruction**, etc This is about when I became interested in climate change. Apart from all the information on CO<sub>2</sub> and that global warming was coming mainly from burning fossil fuels, the article had another comment that is worth quoting.

*"Unfortunately, the challenge of making global warming a central concern of national energy planners is far from being realised. Energy policy-making is often driven by self-interested industries and unions; some such as the coal and oil lobbies push for policies that accelerate global warming."*

It wasn't long after this article the Murdoch press was saying the opposite.

Thirty three years and twenty six COPs later we see the relationship between the *self-interested industries* (the fossil fuel companies) and the *policy makers* (our State and Federal Governments) morph into a powerful symbiotic relationship.

Amongst the obstacles we face in our efforts to curb global warming, perhaps the most formidable is this relationship of vested interests, that continue to stifle progress on climate policy.

These people take no notice of what the scientists and experts have to say until the public catch on to what is happening and their support slips away. This is working but not fast enough. It has forced the current government to get permission from the fossil fuel businesses to use the words '*global warming*,' invent a totally inadequate pretend emissions reduction target and a pretend technology roadmap of adaption and mitigation plan to get there.

The mentality of this course of action is like limiting the treatment of a disease to the use of medicine and tablets, while ignoring the fact there is a cure. Worse still these fossil fuel projects continue to be approved and subsidised, paid for partly by cutting funding to renewable energy programmes.

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### We need the help of influential people such as the IPC panel members.

We are familiar with the process, whereby a proposal for a fossil fuel development (in this case Whitehaven's stage three extension) goes to the Minister who gives it to the Department of Planning for an assessment and a recommendation. So it was no surprise that this proposal was recommended, with the usual justification trotted out, stating the project is '*approvable as the socio-economic benefits significantly outweigh its residual costs and on balance it is in the public interest, subject to strong conditions*'.

**In fact, the opposite is true, the scientists and economists have told us why.**

This justification is a carbon copy of that used in the assessment of the Santos Narrabri Gas Project that received record objections and presentations to the IPC in opposition to the project. I thought we had a chance that the IPC would not approve this project despite the fact the Federal Government had struck a \$2 billion deal with the NSW Government in January 2020 to get the gas out from under our feet to drive the Federal Government's so called "*gas led recovery*". Also, in a speech 15 days before the IPC made its decision the Prime Minister announced "*we need to accelerate development of new gas basins like Narrabri in NSW*" prompting suggestions he was implicitly pressuring the IPC.

The Department of Planning again used these same reasons when they recommended the IPC approve South 32's Dendrobium extension. To the IPC's credit they rejected the proposed extension, only to have the NSW Government overturn this decision.

**No wonder MP Justin Field said the Government's decision risked making the NSW planning system a "farce".**

I hope my fears of an imminent approval are incorrect as it is impossible, and getting harder every day, to justify the approval of this Whitehaven extension on the grounds of *its socio-economic benefits and on balance is in the public interest*, no matter what the strong conditions are.

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## Assessment Report and Policy

The assessment report by the Department of Planning is an attempt to justify the approval of the Whitehaven Underground Stage 3 Extension, that concludes the project is approvable *'as the socio-economic benefits significantly outweigh its residual costs and on balance it is in the public interest, subject to strong conditions'*.

This is a flawed conclusion as the socio-economic benefits and residual costs are largely quarantined to the local community, and NSW, while conveniently ignoring the impacts beyond.

The dubious socio-economic benefits will accrue to a few individuals (in the overall scheme of things) in the short term, as the life of the mine is extended only to 2044.

The Department admits on page 59 that full accounting of Scope 1 and Scope 2 greenhouse gas (GHG) emissions costs to NSW and Australia would significantly decrease the Project's **estimated** (my emphasis) net benefits, and ignores the emissions costs **beyond 2044** to the community, NSW, Australia, and the rest of the world.

Mr Avendano, during the panel hearings on Monday 14<sup>th</sup> February 2022, outlined an alternative method of calculating the cost of GHG emissions using Australian Carbon Credit Units (ACCU's) issued by the Australian Government Clean Energy Regulator, that showed there would be no economic benefit to be gained if the project was to proceed, only a net cost.

Despite the conundrum surrounding the treatment of Scope 3 emissions it should be remembered they already negatively impact NSW wherever the coal is burned. The approval of more Scope 3 emissions will only exacerbate climate change impacts for us and the rest of the world and should not be ignored. Recently Scope 3 emissions have been a contributing factor in decisions to refuse particular projects and should be considered by the IPC for this stage 3 extension.

## **There seems to be a glaring contradiction in the Assessment Report.**

In September 2021, the Government released its Net Zero Plan Stage 1: 2020-2030 Implementation Update, which outlines the actions it proposes to undertake in order to achieve the State's objective to deliver a 47-52% reduction in GHG emissions by 2030 compared to 2005 levels.

Under **Policy Content** Page 55, the Department's Assessment report states *'the impacts of coal mining on climate change have become an increasingly more important issue for the assessment of coal mining projects in recent years'*.

Yet:

The Department admits that NSW has no clear policy to determine the impact of new coal mining projects on climate change,

but suggests that this does not matter because

on page 10 and 11 the **NSW Government's Climate Change Policy Framework** states,

*'this document does not control or directly relate to actions by private entities such as Narrabri Coal Operations Pty Ltd'*

One initiative outlined in the Net Zero Plan of relevance to the Project is the Coal Innovation Program. *'The Coal Innovation Program recognises that the mining sector is one of NSW's biggest economic contributors and states that':*

*'Mining (coal) will continue to be an important part of the economy into the future and it is important that the State's (NSW) action on climate change does not undermine those businesses and jobs and communities they support'*

Seriously? The State's action on climate change is not to undermine jobs? Haven't they got this back to front? Where are the jobs going to be when the planet is burnt? As firefighters?

This ridiculous statement indicates that saying no to this project is not an option.

This is possibly why the Chair of the IPC panel Professor O'Kane made a comment in Narrabri's Courier newspaper that implied that the proposal is to be approved. A similar comment was made by Professor O'Kane during the presentations to the IPC on Monday 14<sup>th</sup> February 2022. She talks only of imposing conditions and makes no mention of the possibility of the application being rejected.



The Departments Assessment Report goes on to say: *'The Coal Innovation Programme is primarily focused on limiting fugitive GHG emissions that come from coal mining through the **capture and combustion** of these emissions to provide new revenue streams to the mining sector'.*

Part of the **Summary of section 6.6** that discusses fugitive emissions there is a paragraph of weasel words. Quote: *'Consequently, the Department has proposed a comprehensive suite of conditions that limit fugitive emissions to no greater than predicted in the EIS, while also ensuring that new technologies and other options to further mitigate Scope 1 and Scope 2 GHG emissions would be regularly reviewed and implemented **where feasible**. The Department considers that these conditions would maximise the mitigation of GHG emissions over the life of the Project'.*

1. Limiting fugitive emissions to that predicted in the EIS is hardly a condition. This would not reduce emissions one iota, besides if they need to exceed them, they will. (Whitehaven's track record of non-compliances is testimony to this) and nobody will be measuring the emissions out to 2044.
2. The Department states: *'the opportunities to minimise fugitive emissions are limited at this stage'*.
3. Elsewhere in the Assessment they think they may be able to *'ratchet down'* fugitive emissions by 1% over time.

If my interpretation of the Department's Assessment report is correct then this mine extension is about to become the largest emitter of GHG of all thermal coal mines in Australia.

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## Economics

I don't think anybody who witnessed the bushfires a couple of years ago would say that more carbon in the atmosphere is good for NSW.

The Stern Review on the Economics of Climate Change was released to the Government of the United Kingdom in 2006 by economist Nicholas Stern, chair of the Grantham Research Institute on Climate Change and the Environment at the London School of Economics. The review points to potential impacts of climate change and, without action, the overall costs of climate change will be equivalent to losing at least 5% of gross domestic product each year, now and forever. Including a wider range of risks and impacts this could increase to 20% of gross domestic product or more, also indefinitely.

The review states that climate change is the greatest and widest-ranging market failure ever seen, presenting a unique challenge for economics. The review also showed that it is much cheaper to avert climate breakdown than to try living with it.

Antonio Guterres, the United Nations Secretary General, on the 2<sup>nd</sup> December 2020 delivered a landmark speech at the Columbia University, on the **State of the Planet**, *'setting the stage for **dramatically scaled up ambitions** on climate change over the coming year'*. Apart from listing many of the statistics, such as *'the past decade was the hottest inhuman history'* he also spoke on putting global finance to work for climate. In summary, financial institutions need to dramatically scale up ambitions to phase out fossil fuel finance and it **is in their best interests to do so**.

More recently in February 2021 at a press conference at the UN Headquarters Antonio Guterres mentions a study commissioned by the UK Government, called **The Economics of Biodiversity Review**. In the summary brief for business it stated, *'Managing and mitigation of nature-related risks can lead to increased resilience of balance sheets for financial institutions and that **acting now will be significantly less costly than delaying further'***.

The banks also have concerns about climate change according to their "managing climate change" statements. I have chosen the NAB as they are Australia's leading agribusiness bank and agriculture businesses are already suffering the negative impacts of climate change. Part of the NAB statement states they need to *'understand how climate-related hazards such as floods, droughts and wildfires can impact bank portfolios via property values, farm revenues, loan delinquency rates, mortgage approval rates and other indicators'*. Also, they say *'we will not finance new thermal coalmining projects or new-to-bank thermal coal mining customers'*.

Interestingly the Bank also recognises that we have missed the chance for an orderly transition away from fossil fuels and they need to examine additional scenarios such as a-- *'disorderly transition'*.

At the beginning of NAB's Managing Climate Change statement they explain why this is important.

*'Climate change is one of the most significant challenges impacting the prosperity of our society and economy'*.

The Federal Government's agricultural research agency reports that seasonal changes linked to climate change have reduced annual farm profits by 23% over the past 20 years compared to the period between 1950 and 2000. To put this in some context it has reduced revenue of cropping farms (that does not include sheep and cattle) by \$1.1 billion a year.

A new report by the Australian Bureau of Agricultural and Resource Economics and Sciences found farm profits could fall by up to 50% over the next three decades if global greenhouse gas emissions were not significantly reduced and producers did not adapt to the changing climate.

Australia is also facing the possibility of being penalised by the G7 for its recalcitrant attitude towards meeting climate standards.

Obviously Whitehaven and the Department think they know better.

The consensus of the expert opinions described above should override anything Whitehaven and the Department of Planning would tell you as they try to get this project approved.

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## Employment

The assessment states that, *'unemployment rates in the Narrabri and Gunnedah LGA's have been higher than for both Regional NSW and NSW as a whole for much of the last five years'*.

Perhaps this implies that the stage three extension will counter this trend with the additional of 13 high paying FTE jobs. Stage 1 and stage 2 have failed to counter this trend.

At this hearing I expect we may hear from some eloquent young mining employees and local business owners that coal mining is good for jobs and the local economy. Frustratingly this is always a short-term view with no consideration given to the bigger picture.

**Never** do they mention the fact that about eighty farming businesses, along with the associated jobs, have been squeezed out by these coal mines, and that number is increasing.

**Never** do they mention the contribution coal mining has to global warming and climate change and the loss of jobs as a result. Recently job losses for the electorate of Barwon (Narrabri is in Barwon) due to the drought were calculated at around 17,500 full time jobs equivalent in 2017-18, and more than 34,000 jobs in 2018-19.

The submissions from these people will probably claim that we need projects such as Whitehaven to (drought proof) our local economy as the farming businesses are so susceptible to drought. They will not mention that Whitehaven Coal is a significant greenhouse gas emitter that has contributed to job losses not only here but around the world.

**Never** do they mention the negative impact of climate change on the economy, a message delivered clearly over the last year or so. Drought followed by Queensland floods that washed away over 500,000 cattle, back into drought, rivers dry up with massive fish kills. 2019 saw many records broken, record heat waves, hottest year on record, driest on record and the worst fires on record during 2019-20. More floods in early 2020 and damaging hailstorms in Melbourne, Canberra, Sydney, and Rockhampton, and don't forget the dust and smoke and continued bleaching of the Great Barrier Reef which is now all but doomed. There has been plenty of references from scientists about the state and future for the reef since the Federal Government announced its \$1 billion smoke screen that will not save the reef from global warming.

Obviously, this is not good for employment or the economy.

So, what does the Commonwealth and NSW governments do to keep people 'employed' and stimulate the economy: blame arsonists for the bush fires, brush it under the carpet as, 'this is not the time to talk about it', and recommend, approve, and subsidise with tax payers money numerous global warming projects. Last year Australia had more than 100 fossil fuel projects at various stages of development.

The government now want the Whitehaven stage 3 extension approved.

## GIVE US A BREAK

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### The scientist

The IPC panel should be all over this information.  
However just in case you missed some of the more recent deliberations.

Scientists are now arguing over how to describe our chance of limiting global warming to 1.5°C, is it, 'virtually impossible' or 'possible, but super challenging' and 'an extraordinary challenge' because 'the world is just nowhere doing what is required for 1.5°C'.

Prof Mark Howden, director of ANU's Institute for Climate and Disaster Solutions, a vice-chair of the IPCC and author of the Australian Academy of Science (*virtually impossible*) report, says its finding on 1.5C is consistent with peer-reviewed evidence. He also points to a study in the journal Communications Earth and Environment that found most countries were not on track to meet the targets they had pledged under the Paris agreement, and the probability of keeping heating below even 2C was only 5%.

A reasonable summary of the current scientific literature is that 1.5C remains an important goal but the evidence suggests global temperatures will overshoot this mark.

How far we overshoot depends on us.

'Australia's 2019-2020 Black Summer of fires was not normal – and we can prove it', according to a new analysis by five authors from the CSIRO and one from the Australian Bureau of Meteorology. This was recently published in Nature Communications and confirms for the first time the Black Summer fires are part of a clear trend of worsening fire weather and ever- larger forest areas burned by fires.

‘This is consistent with predictions from climate change scenarios that severe fire weather conditions will intensify due to increasing greenhouse gas emissions’

*‘Over the last 30 years the areas affected by fire have grown enormously. If we compare the satellite records from 1998-2001 to the period from 2002-2018, the annual average fire areas have shot up by 350 per cent. If we include the 2019-20 Black Summer Fires, that figure soars to 800 percent- an enormous leap’.*

*‘It is now clear that human-induced climate change is creating ever more dangerous conditions for fires in Australia. We need to be ready for more Black Summers-and worse’.*

Scientists are also becoming increasingly concerned about whether we have reached *tipping points* with negative feedback exacerbating warming, and *‘points of no return’*.

The following is an example of a ‘point of no return’

New research shows that 2021 saw the hottest ocean temperatures in recorded history, the sixth consecutive year this record has been broken.

Ecologists analysed sea surface temperatures over the last 150 years which have risen because of global heating. They found the world’s oceans passed the *‘point of no return’* in 2014. The study by the authors at the Monterey Bay Aquarium, US, published in the PLOS Climate Journal found that extreme temperatures occurring just 2% of the time a century ago have occurred at least 50% of the time across the global oceans since 2014.

I am surprised the Department of Planning and Whitehaven have not argued that the warmer oceans would be in the public interest as they would be more pleasant for swimming. To do this they would ignore the fact that Whitehaven’s share of greenhouse gas emissions contributes to warmer ocean waters that supercharge storms, hurricanes, extreme rainfall, which is escalating the risks of severe flooding. Heated ocean water expands and melts around 1 trillion tons of ice per year from the Greenland and Antarctic ice sheets alone, both these processes fuelling sea level rise. Combined this with the carbon dioxide that causes the oceans to acidify we are stoking the collapse of ecosystems and biodiversity.

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[The nonsense trotted out to defend the ‘too small to matter’ argument to justify not taking action on reducing greenhouse gas emissions is flawed.](#)

At a meeting in Baan Baa on 24/2/2021 (referred to earlier) property owners adversely affected by the proposed Stage 3 extension met with the Department of Planning. At this meeting the Department representatives, when asked, admitted they believed in climate change caused by greenhouse gasses emitted by the burning of fossil fuels. For this reason, we asked that the Department’s assessment of this project should not recommend its approval.

The response to this proposition came from the consultant representing the Department of Planning at this meeting.

He commenced by saying *‘there are natural causes of climate change’*. Of course, we and the scientists know this is true, but the comment was made to deflect some of the blame from the fossil fuel industry.

He followed this up with *'and besides if our emissions were a problem then cutting our emissions to zero tomorrow would make no difference as we are responsible for only 1.3%, of global carbon dioxide emissions'*, as if we are irrelevant.

This is almost a carbon copy of what the Prime Minister said during the 2019-20 bushfires.

Australia is the 14<sup>th</sup> largest emitter out of 208 countries. If all countries with emissions under 2% were lumped together they would together be responsible for 40% of global emissions and more than China and India put together.

It's no wonder the G7 is considering penalising Australia for its recalcitrant attitude towards meeting climate standards.

When it comes to emissions, the *'too small to matter'* argument is absurd, reckless and morally bankrupt, and the whole statement an insult to our intelligence.

This is the same thinking of the nong who drives down the highway and throws out their rubbish because they think their little bit would make no difference.

The same argument can be made for every fossil fuel project on the planet. If they are all too small to matter then why do we have a problem with global warming?

This is exactly how we got into the mess we are in, so for the Department to trot out this argument twice now shows how desperate they are to get this project approved.

Every project matters – it's just that the Department of Planning doesn't think that it matters.

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## Biodiversity

The assessment report appears to downplay the impact this project will have on biodiversity that includes an area of State Forest that is acknowledged to be unique and irreplaceable.

The bats on the Bulga Hill may be safe from the subsidence at least, as the area to be mined has been set back to minimise this happening.

However, there was no mention of the proposed ventilation shaft approximately 2 km from these bats and whether the noise will adversely impact them.

There are likely to be other bats living in the area along rocky cliff lines and in tree hollows that will be adversely impacted by the long wall subsidence and clearing that will destroy their homes. Light pollution and noise could also be assumed to have a negative impact.

On page 43 of the Assessment it states that *'baseline surveys encompassing the stage 3 project and surrounding footprint of existing or proposed mining leases were conducted'*.

I could not find any mention of wombats (an iconic species) and the impact the stage 3 extension may have on them, despite the fact I mentioned their presence to a Whitehaven representative on the 28/11/2020.

During the public information session with Whitehaven 28/11/2020 I asked what would happen to the wombats' burrows when the longwalls collapsed. The reply was that "They will just have to build another burrow" My reply was "that is providing they survived being buried alive".

The fact their presence was not acknowledged after being told of their existence begs the question as to why? Maybe they did not want us to know about the wombats, or these surveys are tick the box exercises.

**The attached** photo of one of their burrows on the slopes of the Bulga Hill taken 4/2/2022



It is interesting to note that on page 42 of the assessment report some 617 ha of native vegetation and habitat for threatened species would be required to be progressively cleared, or else impacted by subsidence. Subsidence will cause the death and stress of habitat trees important for threatened species and disrupt surface water flows and will be in addition to the area to be cleared.

The area covered by the stage three extension is about 2500 ha of which about 1100 ha is State forest. Saying that 617 ha will be cleared or impacted by subsidence is downplaying the area to be impacted. The projects clearing and subsidence will impact the whole 2500 ha as it is not confined to a 617-ha corner.

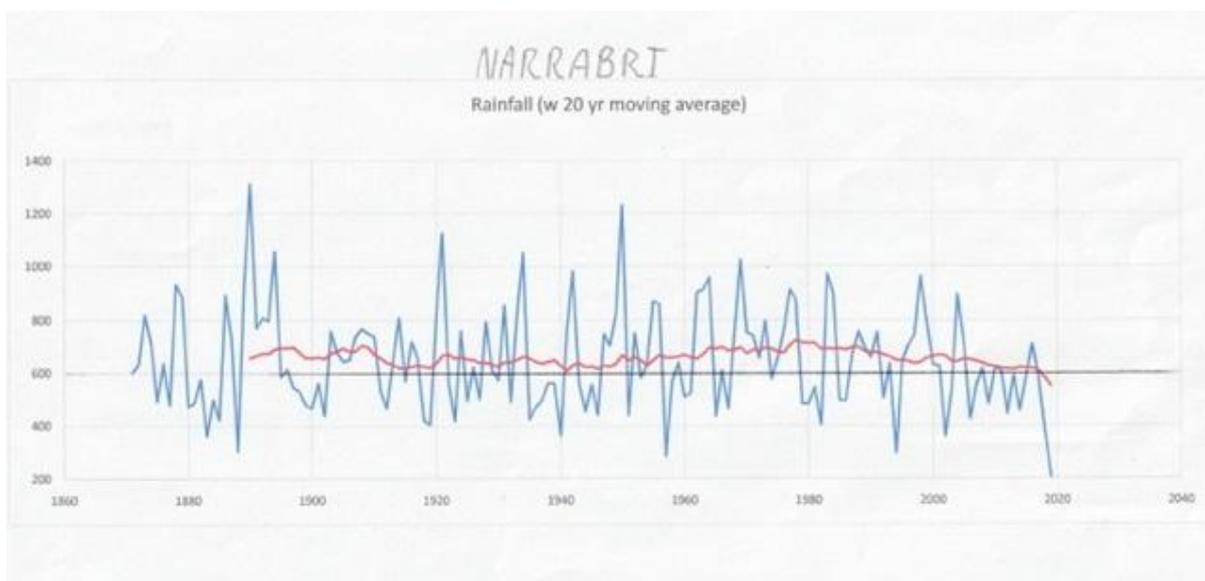
In the beginning I mentioned that our property is a neighbour to Whitehaven and the stage 3 extension comes to our boundary.

Last year I made an application to thin 42 ha, (this was the total area not just the addition of the bits to be thinned) an area 1/60 the size of stage 3, of regrowth comprising mostly cypress pine, a recognized invasive native species. No hollow-bearing trees would have been removed and there would be no subsidence. I explain the need for me to be allowed to do this

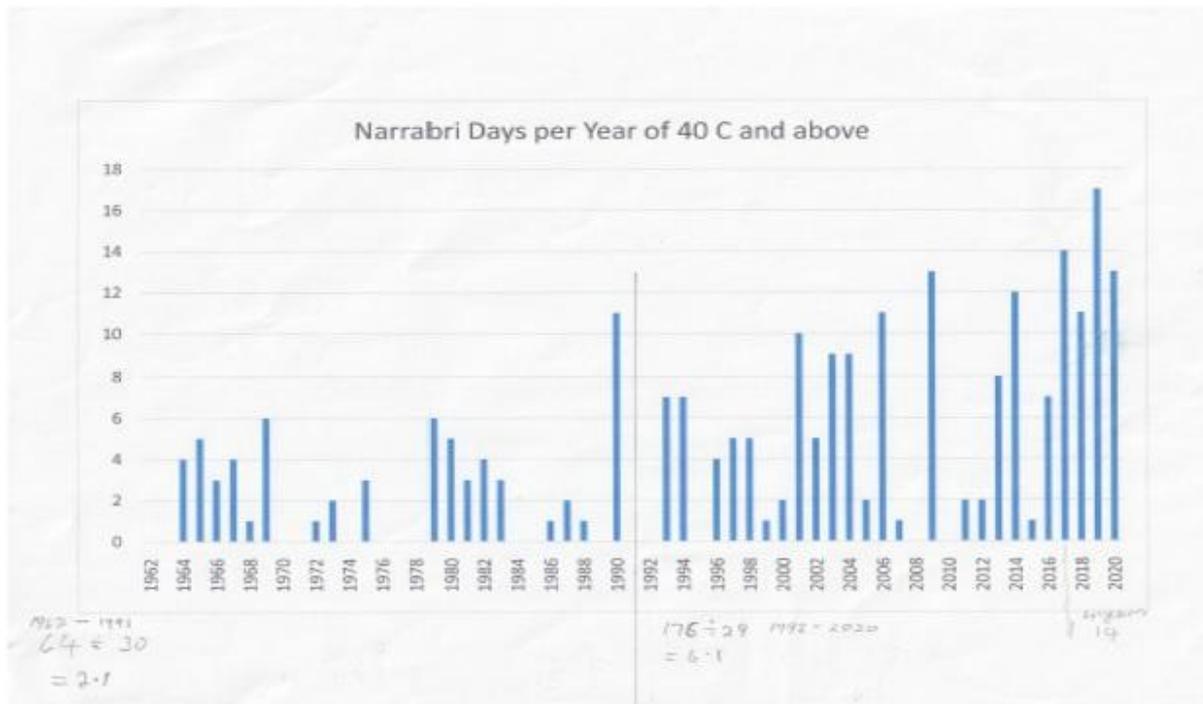
As it gets hotter and drier as a result of climate change we have had to adapt and mitigate the impacts as best we can. Having increased the capacity of our surface water dams, the limiting factor is now being able to provide more grass for our already reduced cattle numbers. Thinning trees would allow our grass production to increase. Not being allowed to increase grass production or at least maintain current production means our business will on average continue a downward spiral from now on.

**Attached** are graphs of temperature and rainfall records for Narrabri (these trends are not unique to Narrabri).

Rainfall records since 1890 using a 20-year moving average to flatten the large yearly variables has trended downwards over the last 20 years.



The BOM temperature records for Narrabri show the number of days of 40 degrees and over have tripled in the last 30 years compared to the previous 30 years.



It is not only farming businesses that have a problem with the trends depicted in these graphs, so do the koalas.

The hotter and drier climate and increased frequency and severity of bush fires I would argue is the main cause of the decline in koalas in the Pilliga Forest over recent decades. Our property has good koala habitat connected to the Pilliga Forest and I have not seen a koala for about 20 years. As we have not had a bush fire since we have owned our property the decline in numbers is due largely to the increase in severity of drought and higher temperatures. This is a known problem for koalas *'as they are highly susceptible to heat stress and dehydration'* according to koala expert Dr. Clive McAlpine, University of Queensland.

Now that koalas are officially declared an endangered species are we going to act or continue to watch their decline? Rejecting the stage three extension would be a start.

**Attached** are two photos:

The first is an image of a section of the Whitehaven underground mine showing the damage before **subsidence**. Unfortunately, the impact of 31 million tonnes of greenhouse gas emissions cannot be seen in this photo. Add to this the fact that this project is not sustainable, running out in 2044.

## Degassing of coal seams involves excessive forest clearing



*Image: Pilliga East Forest on surface of Narrabri mine long walls, the North-South access roads following the location of the logwalls below surface*

The following **photo** is of our property with the boundary outlined in white showing relatively open grassland, grassy woodland with scattered patches of trees, and the dark areas that include the thick regrowth. My request to thin an area of 1/60<sup>th</sup> of the mine's stage 3 proposal so that I can adapt to climate change, to which my neighbour Whitehaven contribute, was rejected.

I was also able to argue that my request would increase biodiversity and is possible carbon neutral despite the fact we run cattle. It is also sustainable, but I must admit this depends on how much worse the impacts of climate change get.

So, we have the same government recommending against my application for minimal tree thinning but recommending that the next door mine be extended with its wanton destruction of trees and habitat. My application was for the property I own, had none of the long list of negative impacts associated with Whitehaven's proposed stage 3 extension, yet it was not approved. I trust that the Panel can see the irony.



If stage 3 is approved, a global heating project with greenhouse gas emissions greater than any recent coal proposals and approvals, will be another example of one rule for the global heating projects and another rule dating back to the 1997 Native Vegetation Act with limits on clearing by farmers to reduce greenhouse gas emissions. These laws meant the Government and the community benefited from improved environmental outcomes while farming businesses are directly bearing the costs.

Even the Hon David Littleproud MP, the Minister for Agriculture, recently admitted in an interview with Kathryn Murphy that the legislation restricting the clearing by farmers was a '*blunt instrument*' and needed to be fixed.

**It would be a miscarriage of justice if the Whitehaven extension is approved while farmers' rights are denied.**

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### Compared to the Dendrobium mine refusal

If the criteria used to reject the Dendrobium mine is applied to the Whitehaven Underground stage 3 extension then it too should be rejected, as the reasons are more compelling.

Whitehaven Underground stage 3 extension will:

1. Adversely impact surface and underground water.
2. Greenhouse gas emissions will be almost double those from Dendrobium (see page 57 of the Assessment).
3. Almost all the coal produced by Whitehaven stage 3 extension is thermal coal, not metallurgical coal produced at the Dendrobium mine.

**If the South 32 Dendrobium mine could not be approved by the IPC then logically Whitehaven's underground stage 3 proposal should not be approved either.**

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### Conclusion

The tragedy is people are suffering enormously from extreme weather events, record fires, record floods, and record temperatures because our decision makers are divorced from the reality of what is happening. Until they have to sit on the beach in the pitch black in the middle of the day, struggling to breathe while their house burns down, they will not wake up to the urgency needed to reduce greenhouse gas emissions.

For me one of the most frustrating parts of this is we have known how to reduce CO<sub>2</sub> emission without undue economic costs, and we have known this for the last 30 years. We have now missed our chance for a relatively orderly transition away from fossil fuels.

We have the world's best renewable energy resources, the science, technology and engineering expertise to seize what is the biggest investment **and job-creation opportunities** this country has ever seen. To continue the approval and financing of more global warming projects when Australia, the driest inhabited continent on the planet stands to lose so much, is extraordinary.

I understand why the Department of Planning appear to be paralysed by political pressure into recommending the approving of coal projects such as the stage 3 extension, - but not the Independent Planning Commission.

The work of scientists who study the Earth's systems gives us the answer to the decision the IPC have to make.

In fact, it is quite straight forward, and it is staring us in the face.

If we are to get to net zero, the logical first step would be to stop adding to the problem.

Yours Sincerely  
Stuart Murray. A Whitehaven Neighbour  
Narrabri.

Phone [REDACTED]