

Independent Planning Commission Submission

Moolarben OC3 Coal Expansion Project

My name is Allan Evans and I have retired from working, more than 30 years, within manufacturing industries in the NSW Hunter and Central Coast areas, in management and engineering support roles. I am now actively involved as a volunteer advocate for both environmental and community organisations including; Australian Conservation Foundation, Hunter Community Alliance, and Hunter Jobs Alliance.

I am writing this submission in a personal capacity to object to the proposed Moolarben OC3 Expansion Project on the basis that it will have unacceptable environmental consequences, with no material benefits for society that in anyway justifies it going ahead.

The NSW State Planning Project Assessment and Approval process is limited in its scope, focussed by design on the specific project being evaluated. There is no adequate provision for consideration of accumulative impacts with activities beyond the project boundaries, and issues affecting the broader society. It is my expectation that the Independent Planning Commission review will consider the broader holistic impacts of this project on society in general and establish if the project will contribute any material benefit to society, not just the proponent Yancoal.

The Intergovernmental Panel on Climate Change has advised that expansion of coal and gas operations are incompatible with emission reductions commitments that nations have made to the 2019 Paris Agreement. Australia is a signatory to that arrangement, so it begs the question why is the proposal for Moorabben Coal to extend their operations, even allowed to be considered.

The Federal Government has committed to a target to reduce GHG emissions 43% by 2030, the Moolarben Coal expansion will substantially add to National emissions.

Expansion of Moorlabben Coal Operations are incompatible with both above Australian Government International and National commitment's and should be rejected on that basis alone.

The proposed expansion of Moolarben coal mine will clear 480 Ha of native vegetation critical habitat for koalas, honey gliders and up to 23 endangered species. The area to be cleared supports high biodiversity of both fauna and flora and will adversely affect the viability of adjacent designated conservation areas. NSW Science conservation team stipulates a minimum 500M buffer zone be maintained around the Munghorn Gap Nature Reserve, the proposed clearance will come to within 100M of the area. Australia has an appalling record of mammal extinction, the Federal Government has set a target for doubling koala population by 2050 and the NSW Government has signed up to that initiative. Clearing this habitat containing viable healthy koala population goes against government initiatives. Yancoal is displaying contempt for the governing bodies of the jurisdictions within which it operates and the social license of the community for its continued operation.

The proposed extended mining footprint will destroy irreplaceable habitat for endangered species: koala, Regent Honey Eater and Large-eared Pied Cat and Eastern Cave Bats, also destroying 400 Ha of critically endangered Box Gum Woodland. Enacting bio-diversity offsets will do nothing to lessen or reverse the impacts of this destruction and disturbance to the native flora and fauna. Enacting bio-diversity offsets is a flawed strategy, equivalent to creative accounting and green washing. It is what is done to try and offset the guilt of doing something that should not have been done in the first place. Impacts on Nature are to be avoided if we are to have any chance of reining in the appalling level of native species extinctions.

Assessment of the proposed project has failed to adequately address its impacts beyond the project boundaries. Ground water movements through the site will be permanently disturbed by the mining activities, adversely affecting surrounding alluvium ground composition, stream formation, and potentially lowering water table. The proposed mining footprint is adjacent to significant natural environmental areas including Munghorn Gap Nature Reserve. Ground water flows through these adjacent areas are integral to their existence and the wellbeing of the natural environment and the plants and animals within the area and beyond. The impacts of mining operations do not cease at the project boundaries. Noise and dust from blasting activities will disturb animals and vegetation and the amenity of recreation areas.

Clearance of the proposed mining footprint will have profound impacts on cultural heritage of first nations people with the destruction of 55 Aboriginal Heritage sites. There is no mitigation destruction will be permanent.

To sum up, the Moorlarben Coal OC3 expansion project has significant adverse impacts within and beyond the project boundaries, for Nature, Environment and Human Society generally. There is no material benefit to the community for the project going ahead. The existing Moorlarben Coal Operation has approval to operate until 2038, by which time, if climate emission reduction targets are to be met, coal extraction should be phased out. I object to any proposed expansion of the Moorlarben Coal operations.

Allan Evans – [REDACTED]

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