

OBJECTION to the Moolarben OC3 Coal Mine Extension Project, Project Number SSD-33083358.

My name is Terry Morgan

I am writing to object to Yancoal's proposed Moolarben UC3 coal mine expansion SSD-33083358 near Mudgee on Wiradjuri Country. I am concerned that this project would cause serious and irreversible harm to the environment, climate and community and should not be approved. In particular, I am concerned that:

- 1) This beautiful valley should be managed jointly as part of a whole conservation landscape with the magnificent Munghorn Gap Nature Reserve, not turned into an open cut coal mine.
- 2) The mine will clear 480 hectares of native vegetation and mine right up to 100m from the boundary of Munghorn Gap Nature Reserve.
- 3) The area has incredible importance for biodiversity and there have been 23 threatened wildlife species recorded in and around the site, including habitat that is critical to the survival of the Koala in a uniquely resilient population.
- 4) The mine will also destroy habitat and is likely to cause serious and irreversible impact to threatened wildlife like the Large-eared Pied Bat, Eastern Cave Bat and Regent Honeyeater, and will also clear endangered Box Gum Woodland.
- 5) It will also lead to water drawdown of up to 5m in the alluvium of Moolarben Ck, which runs into the Goulburn River, and represents a risk to deep-rooted vegetation that uses that water.
- 6) The mine will cause serious harm to cultural heritage - there are 55 Aboriginal heritage sites within the mine footprint that will be directly impacted and a further 12 that may be indirectly impacted.
- 7) The mine will also harm NSW by contributing to runaway climate change, with the NSW Net Zero Commission stating clearly in their recent Coal Mine Emissions Spotlight Report that any further coal mine expansions are inconsistent with achieving NSW climate targets or with a safe climate.

- 8) Further, the assessment of the project has not quantified the economic costs of the downstream greenhouse gas emissions, even though it is now effectively legally required following the Court of Appeal decision on the Mt Pleasant coal mine.

Koalas

Koalas have been recorded in and around the proposed mine site, including a record of a mother and her joey recorded by Lock the Gate with a thermal drone just over a year ago.

The Biodiversity, Conservation and Science Group (BCS) at NSW DCCEEW has highlighted the threat the project poses to the Koala, noting that:

- The Koala habitat present is 'critical to the survival of the species' and that
- It is a climate-robust population which "has survived recent and historical temperature increases, drought and bushfires successfully".

Threatened wildlife and vegetation

The mine will clear habitat for multiple threatened wildlife species and also clear 401 hectares of the nationally endangered Box Gum Woodland ecosystem.

The project has not avoided or minimised impacts on biodiversity and is likely to cause serious and irreversible impacts to a number of entities, including the Koala, Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater, Broad-headed Snake, Squirrel Glider and Box Gum Woodland.

There are vital sandstone cliffs and rocky habitat right along the edge of Munghorn Gap Nature Reserve, which are key habitats for the bat species especially. Blasting and noise represent a major threat to those species.

The department agency said there should be at least a 500m buffer from Munghorn Gap Nature Reserve to better protect those species, but the mining company refused to accept that.

Biodiversity offsets are deeply flawed and simply justify habitat destruction when in fact, impacts on native vegetation must be avoided if we are to avoid further species extinctions.

Water impacts

The project will cause drawdown of the alluvium by up to 5m along Moolarben Ck, and put at risk deep-rooted trees that use that water.

The company has not done proper baseline monitoring of water, and it has a very poor history elsewhere in the mine complex, by failing badly to do ongoing water monitoring required.

Climate change

DPHI in their assessment report has ignored a key finding of the Net Zero Commission in its *Coal Mine Emissions Spotlight Report* released in December - that any further coal mine expansions are inconsistent with the NSW Climate Change Act.

They do not make any reference to Finding 4, which states that “*Continued extensions or expansions to coal mining in NSW are not consistent with the emissions reduction targets in the Climate Change Act or the Paris Agreement temperature goals it gives effect to*”.

The project will produce an estimated 64.6Mt of total lifecycle greenhouse gas emissions - which is equivalent to 58% of total annual emissions from all sources in NSW. As the NZC has stated, any such emissions are not consistent with NSW climate change targets or the Paris temperature goals.

The assessment report also fails to mention that the NSW Government is not on track to achieve either the 2030 or 2035 emissions reduction targets.

The proponent has also failed to apply the Court of Appeal decision in the Denman case, which found that the local environmental, social and economic impacts of climate change, including downstream greenhouse gas emissions, need to be considered by decision makers.

It's impossible for the decision maker to consider those matters for the Moolarben expansion, because there has been no attempt to quantify the full economic costs of downstream emissions to NSW and the locality, even though they make up 99% of all emissions from the project.

Cultural heritage

The project will destroy 55 cultural artefacts, including two shelters, one of which contains grinding grooves. The CHCP recommended protection of that site, but the mining company refused.

Cumulative impacts

The cumulative impacts of this proposal in terms of other current and proposed coal mines in the Mudgee region has not been assessed.

Both the Ulan and Wilpinjong coal mines also have major expansions proposed, and collectively the three existing coal mines and all their proposed expansions have enormous impacts on biodiversity, water, cultural heritage and our climate.

Regional impacts and jobs

There are numerous alternative job opportunities available in the region because Mudgee is part of the Central West Renewable Energy Zone and there is a boom in jobs available in renewable projects, with close to 2,000 new jobs predicted over the next decade.

Further, the existing Moolarben coal complex will continue to operate until 2038 regardless of whether this expansion goes ahead or not.

The further changes now proposed by Yancoal do not reduce the footprint of the mine at all but merely propose to manage more areas of vegetation outside the mine area for so-called 'habitat enhancement'. This amendment won't make any difference to the direct and indirect impact on threatened wildlife and ecosystems, and it completely disrupts the community consultation process that is underway.

This project should not be approved.

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