

**IPC hearing 12 April 2019 Boggabri Golf Club Maules Creek CWA  
Objections to Idemitsu Resources Australia Boggabri Coal mine Project  
Approval Modification Environmental Assessment (MOD 7)**

The Country Women's Association of NSW was formed in 1922 and our branch formed in 1923.

Our organisation is arguably the most influential women's organisation in New South Wales, working to improve the conditions of women and families in rural NSW.

At our 2018 State Conference, Our State Patron, His Excellency The General, The Hon. David Hurley, said of Country Women's Association:

"You've been the backbone, and to some extent the saviour, of generations of families that live in some of the harshest and driest agrarian land. The Country Women's Association makes it possible for families to continue to live in those regions."

<https://www.northerndailyleader.com.au/story/5371935/political-heavyweights-attend-the-cwa-conference-opening-in-armidale/>

Our Branch has some members with one or more of their family working in the coal industry, including Boggabri Coal.

We acknowledge this. People need jobs. However, with regards to our region's future jobs -today is the opportunity for Maules Creek women to participate actively and to talk directly to what has changed since the commencement of this modification process.

There is new information that has come to light and there are new impacts to be assessed and the matters are pressing.

To be explicit towards the Boggabri Coal Modification 7, our position is clear: it is contained in the NSW CWA Just Transitions policy-

That the Country Women's Association of NSW supports positive action on climate change by calling for and supporting the implementation of a plan for transforming regions, communities and workers from fossil fuel extraction, processing and burning sectors to new, inclusive and sustainable economies."

NSW Country Women Members have overwhelmingly supported a move away from coal dependent regions and an openness to new economically, socially, environmentally and climatically responsible possibilities.

We object to the Boggabri Coal Modification 7.

Daily our members are facing serious and undeniable environmental problems - noise and dust - that were predicted in numerous submissions at the time of the Boggabri coal mine expansion approval 09\_0182 in 2012.

Nevertheless the expansion was approved and three years later, Boggabri Coal sought to increase its water extraction by developing a new borefield (Mod 5), and obtaining water licences to aquifer and surface water. Boggabri Coal sought approval to modify their consent to create six new bores. (Two to supply water for the mine, and four "contingency" bores because they found they need 9.5ML per day to run the mine.) The mine found it had a site deficit of 4.7ML per day - half their water demand.

The Maules Creek Branch made a submission to the Boggabri Modification 5. Our submission outlined our fears regarding the approval of a new, high-risk borefield as there was and still is no Leard Forest Mine Precinct Water Management Strategy as prescribed by condition 38(d) of Major Project Approval 09\_0182.

This Precinct Water strategy is still not in place- to the best of our internet searching and certainly has not been understood by our community to date. Neither is the Regional Biodiversity Strategy - known as Stage 3. We are really concerned about the potentially catastrophic, irreversible consequences to the groundwater in Zones 5 and 11 and to regional biodiversity outcomes.

We cannot agree with the DPE's view that further modifications to this project or new projects in our area should go forward without current biodiversity and water conditions being complied with by current major projects.

Right now from mining we consider that our community, ecosystems and water are at risk.

Since 2016 our social impacts have increased. Firstly adaptive management is very complicated as documents are continually changing. And secondly, it has become even more difficult to gain an understanding of the mining projects, because the local mining companies' Project Approvals have changed so that the communities' right to consultation on updated plans has been removed. (Schedule 2-Condition 21)

“With the agreement of the Secretary, the Proponent may prepare any revised strategy, plan or program without undertaking consultation with all parties under the applicable condition of this approval.”

Commissioners, today, we are pleased to see you. You have come to meet with us and find out what is going on. We ask that you carefully read and find answers to our written submission and those of the 34 community members and groups who raised many concerns regards the lack of transparency and information in this modification.

You, have immense power in your hands.

The decision you make will impact the health and financial fortunes of families in the area, a grave responsibility. Because this modification is not what it seems.

Therefore, we do not want to see any Fast-tracking of the IPC process. We are concerned about the lack of detail surrounding this modification.

Boggabri Coal project appears to be setting up for a further expansion- but only if this approval to conduct extensive drilling is approved.

We consider that the IPC must carefully consider rejecting this modification in light of Australia's role in the global commitment to limiting warming to 1.5 degrees.

This modification application is a creep towards expanding coal mining.

The wisdom of Planning in 2012 was to put a break on exploration and

expansion. The stop has come for this project and as a community we need to pause and recognised that the rest of the world has moved on and we do not want to be left behind. This mod is a big deal hidden in plain sight.

Briefly, regards the trucking movements - we raise the amendments to the proposed road haulage (increased tonnage) from 60 tonnes as requested by Boggabri Coal to an increase to 200 tonnes by DPE. This is exceptionally large for a sample of coal. We ask what this is all about and a modification process around this change.

Secondly, regards Drilling and Exploration activities- Our current DPE and BC have told the community that- the “definition is not in the approval”. The claim by both the company and repeated by DPE is that exploration activities are “implicit” in the approval- we say this is false.

The reason further exploration drilling is not part of the current Approval is because if the community were told that mining and impacts on the biodiversity and water in and around Leard State Forest was not going to end until post 2050 this mine would not have gained approval. The magnitude of the impacts are huge. This is an approval creep process.

While the detail is not stated in this EA, this skeletal EA, if approved is to be stapled to the Project Consent, with any changes continually updated through Mine operations plans and other away from public scrutiny. Currently what is revealed through the MOP is a drilling program of 200 boreholes up to a depth of 400 m.

At least ten of these boreholes will be drilled deeper than the current Merriown seam at 300m down to the Templemore seam at 400m.

This important information as it is – is that it is beyond the depth of the current approved limits of mining. The Merriown seam is where mining currently stops. We need more information and a proper modification process around this detail.

Further, the specific drill sites are not known. The impacts to biodiversity have not been assessed. And this is not acceptable in 2019.

Thirdly, and crucially, the impacts to groundwater systems from drill holes intersecting multiple aquifers, altering groundwater chemistry, altering groundwater levels in aquifers, possible contamination from run off from drilling fluids and chemicals and possibly produced water occurring are not well understood let alone well known by the community.

Our aquifers cannot take any more experimentation from mining until we have scientific certainty. Mod 7 is a bridge to far.

Maules creek CWA are aware that the scientific knowledge and understanding of aquifers in our area is not well known. The deep and the shallow- despite said to be extensive monitoring. Our community are currently experiencing unprecedented water impacts, we are in intense drought and the lack of certainty around water is very stressful.

In closing we ask the commissioner to take the precautionary approach and exercise "careful evaluation" we say this is including the adequacy of information for the Modification 7. It is the opinion of the Maules

Creek MOD 7 does not provide the decision-makers with the requisite information to make a "careful evaluation" within the intent of the New South Wales planning laws.

We say that intergenerational equity has been disregarded in both the planning and regulation of the Leard Forest precinct coal mines, the mines are being allowed to proceed apace and even to modify their consent conditions to the detriment of the environment and to the detriment of intergenerational equity.

We believe that it is preferential to apply the Precautionary Principle; as for example, has been applied to local farmers since 2006 over many years- with the use of a Section 234 clause on groundwater extraction (Water Act 1989).

Thankyou. Maules creek Branch of the CWA of NSW 12 April 2019