

This response opposes the approval of Modification 7.

Thank you for this opportunity to contribute to the discussion regarding the application of Boggabri Coal to modify the conditions of its Approval 09\_0182. Over the past 45 years I have come to appreciate the value of the region around Boggabri as a school teacher escorting student excursions and as a member of the wider community concerned at the destruction of irreplaceable native habitat and the threats to our climate, water and soil posed by mining activities. I am concerned for the on-going viability of the local community, the incompatibility of the development with existing land-use and the complete disregard for intergenerational equity, cumulative impacts and the precautionary principle reflected in the Modification.

I have previously expressed my concern that, while some of the components of the Modification may be 'minor' and 'administrative', others will have significant impact on the community and environment (particularly with regard to offsets, transport of coal by road, drilling and exploration activities and management of biodiversity). These issues have been explored in another submission.

An examination of the website for Idemitsu (80% stakeholder in Boggabri Mine) reveals that none of the three banners refers to mining at all. One announces 'Sustainable Future; Idemitsu plans to build on its sustainable agricultural and cattle business'; the second proclaims 'investing in renewables...and pumped hydro' and the third says 'committed to the safety and well-being of our people and working closely with local communities'. This raises a question: why seek Modification 7 at all if the principle stake holder is re-orientating its commercial activities towards renewable and sustainable activities?

Section 4.5 of the Modification , 'Drilling and Exploration' is of particular interest. 'It will be necessary ...to undertake exploration activities to refine the understanding of geological structures....including

- gravitational, magnetic, electrical and electromagnetic testing
- open-hole drilling to the basement of the coal basin
- in-fill drilling
- limit of oxidation drilling
- down-hole testing including gas sampling and testing'

Two matters are of particular concern:

the Mine has never had permission to do testing other than 'in-fill' drilling- it would appear that all drilling undertaken to date which is not 'in-fill' is in breach of the Mine's approval and that an attempt is being made to insert additional methods of testing and exploration into the conditions, to create the impression that they already exist;

there has been no assessment of the impact on the environment, particularly on water tables and aquifers, of drilling 'to the basement of the coal basin'.

It would appear to be a reasonable conclusion that the Modification is an attempt to maximise the value of this asset with a view to its sale. Demands of intergenerational equity, cumulative impacts and the precautionary principle require that the Modification be rejected.

Elizabeth O'Hara [REDACTED]  
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