

EPBC Referral Unit
Department of Agriculture, Water and Environment
GPO Box 858
Canberra ACT 2601

Tuesday 12 April 2022

**EPBC Act referral:
2022/9162 - Moolarben Coal Complex OC3 Extension Project.**

Submission of Objection

Mudgee District Environment Group objects to The Moolarben Coal Complex OC3 Extension Project (the Referral). There is so much that is unknown due to unfinished reports, and 'indicative' mapping that the Referral is lacking in detail and must be considered insufficient. There are a number of matters of concern to members and comments are provided below in the same sequence as they are presented in the Referral document.

1.2 Provide a detailed description of the proposed action, including all proposed activities

This 'extension' is equal to a new, large mine. Four new open cut mines, water management infrastructure, haul roads and development of stockpiles and borrow pits, will create unacceptable loss of vegetation and associated animal communities, major landform changes and natural water flow impingement. We believe this Action requires the closest examination and investigation.

1.3 What is the extent and location of your proposed action?

It is noted that Moolarben Creek and Murdering Creek are described as having 'No Proposed Open Cut Mining in Accordance with Minimal Impact Considerations of NSW Aquifer Interference Policy', yet the proponent intends to use these fragile areas for 'Ancillary and Supporting Infrastructure Only'. See also the proponent's comments in 1.6. This use is not acceptable. 'White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC' and 'Central Hunter Valley Eucalypt Forest CEEC' have Preliminary Mapping only. These important vegetation communities require further investigation and mapping.

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders

The proponent's stakeholder engagement strategy is very superficial. The consultation with MDEG was limited to a phone conversation with one member. Phone calls to the proponent offering our availability to provide input were not returned. Thus, the engagement process was limited and this limitation may well contribute to limited data in the proposed action site, and the social impact assessment.

1.15 Is this action part of a staged development (or a component of a larger project)?

Surely the answer here should be 'yes'.

2.4 Is the proposed action likely to have any direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

The lack of complete reporting and availability of full information here is of great concern. The nature of the proposed action means that the most detailed mapping and assessment is required for all species and threatened ecological communities (TEC). This must be obtained and reviewed as a high priority. Some examples are given:

Central Hunter Valley Eucalypt Forest and Woodland More investigation and assessment is required of this TEC. The final report from Eco Logical Australia is not available.

White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland The loss of this significant habitat will have deleterious effects on all species that use this community.

Habitat loss Habitat loss is a Key Threatening Process. The cumulative loss of habitat for listed species within the project area is significant and cannot be adequately offset. Mudgee-Wollar is an Important Bird Area and habitat loss should not be permitted. The negative indirect impacts such as noise, lighting, dust and loss of connectivity must also be given the highest priority in assessment of impacts.

2.9 Is the proposed action likely to have any direct or indirect impact on a water resource from coal seam gas or large coal mining development?

There is no mapping or assessment of the significant springs within the valley where the proponent intends to operate an Open Cut Mine. The springs are at the head of the valley and adjacent to the nearby escarpment. The springs are a vital element of the landscape and provide permanent water: they are an important drought refuge for all native species (threatened or not), as well as supporting groundwater for groundwater dependent ecosystems that have not been identified in the mapping.

The loss of these springs has not been addressed in the referral. The assessment of impacts on water resources is incomplete. The mapping of the springs is critical to the assessment of the impacts on water resources. The impacts will include reduction of base flows to the creeks and drawdown of connected alluvial aquifers.

Detailed investigation, mapping and assessment is needed.

3.7 Description of the current condition of the environment relevant to the project area

The Munghorn Gap Nature Reserve surrounds the project area. It is incongruous to consider an Open Cut Mine adjacent to this significant reserve. The connectivity for species movement from the reserve to the valley is highly important. This is the last valley not impacted by open cut mine operations. Indirect negative impacts will occur for the critically endangered remnant vegetation and other ecological communities.

3.9 Description of Indigenous heritage values relevant to the project area

The Referral lacks any detail on cultural heritage values. There has already been loss of cultural heritage values in the landscape due to large-scale mining activities. The cumulative effect of this needs to be acknowledged and any further loss prevented. This area is significant as it is associated with the Goulburn River trade routes and a known corroboree site at Cooks Gap. The Traditional Pathways of the Aboriginal people are intrinsically tied to the landscape. Changes to the visual landscape impact negatively on their connection to the land.

Section 8. Proposed alternatives

As the project will not extend the life of the mine or increase production rates of coal above existing approvals the project will not provide any additional public benefit above that already provided by existing operations. On the contrary, this project will contribute to the Global Warming crisis and its approval would increase the catastrophic effects of this. Impacts from Global Warming are becoming increasingly expensive and severe and any increase in these impacts is not in the public benefit.

As outlined above the project would impact negatively on biodiversity and threatened species and communities, water resources, and cultural heritage.

MDEG members believe there is no valid justification for the project to proceed. We strongly urge that the proposed controlled action not proceed.

Thank you for the opportunity to comment.

Sincerely,



Rosemary Hadaway
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