



CATE FAEHRMANN MLC
Member of the Legislative Council
THE GREENS NSW

NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attn: Mining and Industry Projects

1 June 2012

Dear Madam/Sir,

Re: Coalpac Consolidation Project: Application No: 10_0178

I write on behalf of the NSW Greens as the spokesperson for environmental issues.

It is well known that the NSW Greens do not support the expansion of coal mining because of its contribution to the greenhouse gases that are causing dangerous climate change and we would prefer to see the State's economy make the transition across to renewable forms of energy. The Coalpac proposal would, if approved, make a large contribution to Australia's already high carbon footprint.

However, irrespective of our position on coal mining, we strongly object to this coal mine specifically because of the irreversible damage that will be done to the significant biodiversity and geodiversity in this particular area.

The NSW Greens support the NSW National Parks and Wildlife Service's wish to add the Ben Bullen State Forest to the conservation reserve system as a matter of priority. It is an area with outstanding natural values including an abundance of biological diversity and outstanding but precarious rock formations. A large open cut coal mine is utterly incompatible with the conservation of these values.

The Blue Mountains Conservation Society is concerned the mine would destroy the habitat of over 400 native plant species and that mining under the internationally



significant rock formations known as 'pagodas' threatens them with partial or total collapse. They also object to the devastation the mining activity will wreak on the landscape and spectacular scenery of the Ben Bullen State Forest and the risk to the scenery of the Pagoda Escarpment. The NSW Greens share those serious concerns.

Hundreds of hectares of vegetation in Ben Bullen State Forest will be razed including the removal of approximately 19,200 *Eucalyptus cannonii* trees which are protected as vulnerable to extinction under both state and federal law. It will also remove 48.4 hectares of critically endangered Box Gum Woodland and 3.5 hectares of threatened Geebung habitat also listed under the *Commonwealth Environment Protection and Biodiversity Conservation Act (EPBC Act) 1999*. These are unacceptable impacts to protected biodiversity.

We understand that habitat for 35 mammal species, 15 of which are listed under the EPBC Act, will be lost. Habitats for 12 bird species threatened under the EPBC Act, including the Regent Honeyeater, Tiger Quoll and Powerful Owl, will also be completely removed. Other biodiversity at risk will be the iconic lyrebird which uses the sides of pagodas in this area to nest and raise its young and the mining will remove its food habitats in the valley below.

It is of further concern to the Greens that local botanists have identified over 70 native plant species that exist in the Ben Bullen State Forest that were not identified by Coalpac in the environmental assessments they commissioned. I seek assurances that the impact of the mine on each of these species will be properly assessed and considered.

The mine should be opposed due to the inevitable impacts it will have on the local hydrology and the detrimental consequences of that for the ecosystems it supports. Mining for the sandstone for construction sand in the proposal area will lower the water table and dry out the landscape. Acid drainage and heavy metal pollution from the mine is likely to impact on local streams and aquatic ecosystems for many decades.

The NSW Greens are extremely concerned for the social and health risks to the residents of Cullen Bullen. The town is already negatively impacted by Coalpac's open mining activity and this proposal will increase particulate pollution.



Cullen Bullen will be blighted by particulate pollution and residents' health will be put at risk. Property values will likely suffer as the town becomes surrounded by degraded land.

Also objectionable is the fact that the mine will deny the public access to a large area of public land for at least two decades.

The Government can have no confidence in the company's ability to rehabilitate the irreplaceable complex of biodiversity and geodiversity of this area following open-cut coal mining. I recently visited the site of ongoing heavy metal pollution into the Grose River in the Blue Mountains World Heritage Area from an earlier Coalpac mine– the Canyon Colliery. The abrogation of responsibility in relation to the pollution they have caused to the Grose River must surely erode any last shred of confidence the Government harbours for the remediation plans the company has for its Ben Bullen operations. Indeed, the company's environmental performance at the Invincible Mine, where it was fined \$200,000 on one occasion for exceeding coal production limits and on eleven other occasions for pollution incidents, should also count against them.

Furthermore, the Government should have no confidence in the biodiversity offset package that Coalpac has proposed. We consider it inadequate and uncertain. Rare and unique habitat that has evolved to that particular climate and geology over millions of years cannot be replicated or compensated for elsewhere.

I declare that I am a member of a political party.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Cate', with a long horizontal flourish extending to the right.

Cate Faehrmann