

Dear Ms Hawkeswood,

Re: Boggabri Coal Mine: Modification 7

[REDACTED] has grave reservations concerning Boggabri Coal's application to modify the conditions of its Approval 09_0182. It is our considered opinion that both the nature and impact of the Modification (known as Boggabri Coal Mine: Modification 7) require further investigation.

The nature of Modification 7

[REDACTED] draws attention to the inaccurate description contained in the Environmental Assessment of the Modification as 'administrative'. The Modification is complex with five parts, and while some of the matters referred to are minor or 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).

Offsets

[REDACTED] considers that additional information should be made available by the Proponent to the Department of Planning regarding the mechanism proposed for securing the required offsets. The request by Boggabri Coal to modify condition 47(a) of its consent to extend the time limit to register offsets (which were to have been registered by December 2014) and to decrease the specificity of offset provision is disturbing. Acceptance of this aspect of the Modification would create a precedent unacceptable to the community however welcomed by mining companies; one which would completely undermine an already struggling and unviable system of biodiversity offsets in NSW.

Transport of coal by road

[REDACTED] considers that additional information should be made available by the Proponent to the Department of Planning regarding its proposal for transportation of coal by road. The proposal contains no limit on the frequency of the proposed transportation by road and no indication of destination. Further explanation should also be sought by the Department as

