

Steve O'Donoghue

To: Carolyn McNally; Steve O'Donoghue
Subject: Project Application Number 09_0182 MOD 7

The Secretary,
Department of Planning
GPO Box 39
SYDNEY NSW 2001
via email:
Carolyn McNally, Secretary, Department of Planning and Environment
Carolyn.McNally@planning.nsw.gov.au

Cc: Stephen O'Donoghue, Planning Officer
Stephen.ODonoghue@planning.nsw.gov.au

Dear Secretary,

Re:Boggabri Coal Project
Project Application Number: 09_0182 Mod 7

I object to this modification. Our local community has been provided with not enough

information to assess the Modification with. We, and our environment will be impacted

by this decision.

The cumulative impact of "administrative" or minor modification, when considered in total is changing the nature of our district. The original approvals are changing and with no oversight from the community to see the overall picture.

The determination by the Planning Department that five modifications to Boggabri Coal's Project Approval is minor in nature or administrative is unfair and the logic to this is missing

The community needs more information and a public process to assess the full impacts.

The community would rather the government put energy into ensuring local mines work to their Current Approvals rather than removing or changing conditions to avoid compliance.

- Example 1- Boggabri Coal's 2017 Annual Review recorded 21 non-compliances- all considered by the company and Government to be low risk or administrative.

- Example 2- SMEC 2015 Independent Environmental Audit for MCC dated 22 August 2016 found 47 issues resulting in 61 non-compliances and 36 of these were administrative.
- Example 3- At WHC's MC Mine CCC meeting Aug 2018- when asked why the Sound Power Modification was withdrawn the startling WHC response was "because we believe we are compliant."

The specific Modifications Requested and community questions that require more information

1. Transporting of coal by road, which road, how many trucks, why not inform the councils and RMS when the process is working, what about adding to the cumulative impacts from other coal trucks? Why does a company need 60 tonnes for marketing?
2. Offsets- This seems to be about less transparency as well. Why when the current PA requires specific detail as to how the offsets will be secured would the community and government now want less detail? Why is an extension of time required for registering the offsets from 2014 to 2019? The impacts on the environment are huge. Has this been formally achieved by The DPE and OEH? Where have the community been notified that this has occurred?
3. Exploration and drilling: The community and the Secretary need more information than that provided in this application. Where and how much and how deep will the proposed drilling and exploration activities take place including the nature of the vegetation that will or may be cleared. Will any additional offsets be required due to additional clearing?
4. Changing the Boggabri Coal and Tarrawonga Coal Mine common boundary Project Approval area and
5. the Boggabri Coal Mine use of the stockpile area approved for Tarrawonga Coal Mine:
 - Why is there no Environmental Rep on the Tarrawonga CCC?
 - Without an environmental representative mandated for the Tarrawonga CCC the Modification application parts referring to Tarrawonga must be rejected. There is little environmental oversight at all as is obvious to see from Goonbri Road throughout the year.

I am of the opinion that this modification project should have more information provided to you and the community and that the exhibition period be extended for a

further 28 days and be referred to the Independent Planning Commission (IPC) if necessary.

