



**Healthy Rivers Dubbo**

**PO Box 216**

**Dubbo NSW 2830**

[heathyriversdubbo@gmail.com](mailto:heathyriversdubbo@gmail.com)

ABN 11 988 241 202

The Independent Planning Commission

Submitted online

12 February 2022

### **Whitehaven Coal Narrabri Underground Stage 3 Expansion**

Healthy Rivers Dubbo is a grass roots community network dedicated to providing a strong voice for our local rivers, aquifers and wetlands in the Murray-Darling Basin for the benefit of wildlife, plants and people. We pay our respects to Elders past and present and acknowledge that this land was never ceded.

Healthy Rivers Dubbo (HRD) is pleased to have the opportunity to provide a written submission to the expansion of Whitehaven's Narrabri Underground coal mine Stage 3.

#### **Healthy Rivers Dubbo objects to the expansion of Narrabri Underground Stage 3**

### Groundwater

The protection of groundwater in inland Australia is critical for the environment, wildlife culture and communities to survive.

The drawdown of aquifer levels that is expected from this project exceeds the impact criteria in NSW's Aquifer Interference Policy, and on those grounds should not be approved. This policy exists to protect communities and the environment from over exploitation and pollution of precious groundwater. If this policy is not enforced, the community can have even less faith in the NSW Government to enforce policies that are in place to protect us.

There are 160 hectares high priority groundwater dependent ecosystems that will experience groundwater drawdown. Whitehaven admitted in its response to submissions that "At some groundwater dependent vegetation, predicted drawdown exceeds 10m which is expected to result in larger trees potentially not being able to access groundwater in drought conditions."

Stygofauna are any fauna that live in groundwater systems or aquifers. Most stygofauna in Australia are crustaceans, but they also include worms, gastropods, beetles, mites and fish. Never seeing the sun, they have no circadian rhythms. They grow slowly, don't have many young, live long lives and stay close to home. It is because of their characteristics born of their low-energy environment, and their incredible age, a lot of stygofauna species are extremely rare and localised.

Stygofauna contribute important ecosystem services by creating a nutrient cycle, and have been recognised as indicators of groundwater health.

A survey of 22 sites within the nearby Pilliga Sandstone aquifer conducted in 2016-17 reported a total of eleven taxa of invertebrates were recorded which included ten families from five orders of

stygo fauna. These orders included: Oligochaeta, Acarina, Crustacea, Insecta and Nemertea. The results showed stygo fauna exist across the entire area.<sup>1</sup>

The presence of stygo fauna should mean that areas are nominated as High Conservation Value ground water dependent ecosystems and protected under the Fisheries Management Act 1994.

At least nine bores which are crucial for water stock will be affected by groundwater drawdown. This is an erosion of the basic landholder right to access water. The cumulative impact of the planned Santos coal seam gas project close by would likely mean groundwater drawdown would be far higher than expected.

Such large aquifer drawdown would take at least one hundred years to recover, far exceeding the lifespan of the mine.

Dewatered springs due to the drawdown of groundwater that this project promises will lead to a reduction in baseflows for the Namoi River. Any reduction in baseflows would be a reduction of Planned Environmental Water, which is not allowed under the relevant NSW Water Sharing Plans, the Murray Darling Basin Plan and the Commonwealth Water Act 2007.

Priority number one of the State Water Strategy is to build community confidence and capacity through engagement, transparency and accountability. If NSW is not prepared to implement policies and legislation that is created to protect natural places and people, this stated priority has no integrity.

## Climate change

The impacts of climate change on inland waterways is already being felt. The draft Namoi regional water strategy released in 2020 contained climate change predictions from extensive modelling invested in by the NSW tax payer. The report states that climate change impacts in the Namoi region under the worst-case dry scenario would lead to a change in rainfall patterns, increased evapotranspiration, higher average temperatures and more hot days. There will be a higher probability of the most recent severe drought reoccurring and extended droughts could occur more frequently.

This extension would mine an extra 100 million tonnes of predominantly thermal coal, releasing 34 million tonnes of greenhouse gases locally and another 456 million tonnes when the coal is burnt. Methane venting will mean emissions from the mine will triple, and there would be no way to mitigate and reduce methane emissions should this extension go ahead.

The Narrabri underground coal mine will have the dubious title of the second most polluting coal mine in NSW should this expansion go ahead, yet the NSW Government is committed to effective action on climate change and aims to achieve net-zero by 2050. These two realities cannot co-exist.

And all of these increased emissions would be occurring at a time when human induced climate change is a real and imminent threat to a liveable planet.

The Intergovernmental Panel on Climate Change, or IPCC released its Sixth Assessment Report in 2021. It declared a code red for humanity. The IPCC report found that it isn't too late to secure a future where warming is kept below 1.5C and we avert many of the most worrying impacts. To do this there must be no new coal and gas projects approved.

---

<sup>1</sup> STYGOFAUNA PRESENCE WITHIN FRESH AND HIGHLY SALINE AQUIFERS OF THE BORDER RIVERS REGION IN SOUTHERN QUEENSLAND SCHULZ, C., STEWARD, A.L. & PRIOR, A. 2013.

UN secretary-general Antonio Guterres says the IPCC findings must "sound a death knell for coal and fossil fuels, before they destroy our planet".

## Impacts to The Gomerioi

The Gomerioi People are sovereign caretakers of the Country impacted by this proposal. Sovereignty was never ceded, and there is no treaty with First Nations Peoples. Australia is the only colonised country in the world without a treaty with First Nations.

There are many recorded cultural sites on the land that would be impacted by this project. The consideration given by DPE and Whitehaven to this impact was minimal.

The Gomerio Traditional Owners have stated their opposition this project strongly and clearly. This opposition should be respected for what it is – the wishes of the rightful caretakers of the Place.

## Recommendation

That the IPC reject the expansion of Narrabri Underground Stage 3 on the grounds mentioned above.

For further information about this submission contact Melissa Gray, Convenor of Healthy Rivers Dubbo on [healthyriversdubbo@gmail.com](mailto:healthyriversdubbo@gmail.com).