



19/9/2024

Department of Planning, Housing and Infrastructure
Locked Bag 5022, Parramatta NSW 2124
Via NSW Planning Portal

Subject: Notice of Exhibition – Vickery Mine Extension Modification 1 (SSD-7480-Mod-1)

Introduction

Cotton Australia is the peak body for Australia's cotton growers, representing up to 1,500 cotton farms mainly in New South Wales and Queensland but also in the Northern Territory and Western Australia. Cotton Australia works with growers and stakeholders to ensure the Australian cotton industry remains viable.

Cotton Australia supports the Australian cotton industry to be globally competitive, sustainable and valued by the community. It drives the industry's strategic direction, retains a strong focus on research and development, promotes strength of the industry, manages sustainability reporting and implements policy objectives.

There are 14 major cotton producing areas nationally, NSW represents 66% of this and the State's north west region typically represents 40% of the area planted. The crop is processed domestically by 39 domestic cotton gins, 15 of these are located in NSW. The national crop in 2022-23 was worth \$3.7 billion (gross), generating 5.1 million bales of lint and directly employing an estimated 7,222 people. This season's crop is on track to generate 4.8 million bales of lint¹.

We do not typically get involved in locally based issues as we take a position that we only represent the broad concerns of growers. However, Cotton Australia continues to hold the view that any work concerning the Vickery Extension Project's site (The Project) has much broader implications for our growers. This due to the proximity of the development to prime agricultural lands and high-quality water resources. Furthermore, Cotton Australia objects to this Modification request because it will just add further 'creep' to the significant development creep that The Project has been able to secure.

¹ Forthcoming CRDC publication

COTTON AUSTRALIA LIMITED

Head Office Suite 4.01, 247 Coward St, Mascot NSW 2020 Australia

Phone + 61 2 9669 5222

Brisbane Level 8, 183 North Quay, Brisbane QLD 4000

Toowoomba Unit 3, 6 Rutledge St, Toowoomba QLD 4350

Narrabri Level 2, 2 Lloyd St, Narrabri NSW 2390

ABN 24 054 122 879

www.cottonaustralia.com.au



General observations

Cotton Australia considers that the protection and sustainability of land and water resources and enhancement and maintenance of landholder land access rights is of utmost importance.

While we recognise that the mining industry offers potential economic benefits to Australia, without proper regulation and enforcement the mining industry also poses significant risks to the Australian cotton industry.

Specific to mining our long-held policy principles include:

- Protecting the productive capacity of agricultural land from mining extraction activities.
- Opposing any mining development unless and until it can be definitively proven, that the development will have no impact on the productive capacity of the land.
- That any existing or approved mines are rehabilitated to their pre-development productive capacity, within five years of ceasing production. That these activities follow a comprehensive rehabilitation plan, with clear and enforceable timeframes.

It is in light of these Cotton Australia policy principles that our concerns, that we reiterated the concerns we raised in 2018 and 2020.

Proposed Modification Elements of Concern

Rail Loop Disturbance Construction Footprint

Temporary Batching Plant

We note that the Modification requests on page 4:

- “an increase in the temporary construction foot print for The Project rail spur [plus]
- ...temporary construction access road [plus]
- ...additional topsoil stockpile area located adjacent to the temporary construction access.”

There is also a request to site a concrete batching plant in this area of The Project. [P6]

Despite being both “within the approved disturbance footprint for The Project” [PP 4, 6] they are still in close proximity to the Namoi River and hence Cotton Australia reiterates our previous concerns:

- The overall excavation activity is located adjacent to the Namoi River and its flood plain.
- The coal stockpiled for washing or transport is even closer to the Namoi River and floodplain than the mine area.
- That reliable climate modelling such as the NSW and ACT Regional Climate Modelling (NARClIM) Project² continues to indicate the frequency and veracity of storm effects will change, not just temperature and dry spells. Consequently, these projections suggest the volume of what is currently considered a large rain event, such as the magnitude of a 1 in 50 year or a 1 in 100 year, will occur more frequently and possibly in a shorter period of time.

² The recently released 2024 update has continued to signal these trends
<https://www.climatechange.environment.nsw.gov.au/about-adaptsw/climate-projections-used-adaptsw>



Cotton Australia notes the Modification proposes to have a concrete batching plant adjacent to coal processing facilities but these are even closer to the Namoi River than the mine itself.

We respectfully remind the Department that this locality saw significant flooding during both 2021 and 2022, inundating Gunnedah, Narrabri and Wee Waa each time³.

Furthermore, Cotton Australia is disappointed that Whitehaven Coal was not able to foresee the need for the concrete batching plant in the original proposal. Adding this element onsite now, in our opinion, is another example of intentional development creep. This is because the batching plant comes with a number of impacts itself and these will be on top of the existing suite of accumulative impacts, all of which are in close proximity to the river and its floodplain. It is our view that if the total sum had been previously presented for assessment it would have suggested a greater impact and resulted in a different assessment determination.

Cotton Australia recommends relocation of the batching plant with increased bunding around the site and forward planning for large and sudden rainfall events.

Waste Tyre Disposal

Cotton Australia notes that Whitehaven's approach to end-of-life tyres reflect its dated focus of extracting rather than transforming resources. Given the number of operations Whitehaven has in the Narrabri - Gunnedah local government areas it is surprising that there isn't sufficient critical mass of waste tyres to warrant pursuing an alternative end-of-life solution. Doing so may also foster a new business opportunity and disposal options for a number of other mining operations in the northwest and central west of NSW.

Cotton Australia recommends the Department and NSW EPA oblige Whitehaven Coal to pursue more innovative solutions to end-of-life tyres in the interests of the circular economy and report on their efforts to do so in their annual reports to the agencies.

On site Production of Gravel Materials

Cotton Australia notes the request to extract and transport gravel for the purposes of producing "...up to 90,000 m3 per annum of gravel material produced by crushing and screening of suitable overburden (excavated from within the open cut extent) in the on-site mobile crusher at the" mine infrastructure area.[P8]

In Cotton Australia's view these actions will add to the already significant impacts of an area that is currently quiet and dark at night. We iterate to the Department our concerns about the now approved Coal Handling and Preparation Plant (CHPP).

Cotton Australia previously raised that CHPP would introduce a level of dust, noise, light and sounds not currently present in the landscape. Also that these concerns had not been sufficiently examined because they were omitted from the Vickery Extension's Social Impact Survey.

³ Examples from three recent events and these occurred within a 12 month period:
<https://www.abc.net.au/news/2021-11-29/nsw-floods-rescues-gunnedah-narrabri-namoi-river/100657640>
<https://www.abc.net.au/news/2022-09-19/four-homes-inundated-gunnedah-namoi-river-recedes/101452784>
<https://www.abc.net.au/news/2022-10-28/before-and-during-photos-of-gunnedah-and-moree-floods/101585484>



The farmland adjacent to the Naomi River and the Vickery Mine project footprint plus the land through which the rail spur traverses is used to grow cotton and other crops.

According to the Cotton Research and Development Corporation's annual cotton growing practices survey, the northwest NSW region (Lower - Upper Naomi, Gwydir and Bourke areas) is responsible for around 40% of the area planted each year. In 2023-24 the region's average irrigated crop yield was 12.15 bales per hectare (across the entire crop that season the average was 11.93 bales/ha irrigated and 4.05/bales rain grown).⁴

Cotton lint is classed and priced according to its physical attributes that affect the quality of the finished product and/or manufacturing efficiency. Australia uses the US Department of Agriculture developed classing system and includes whiteness (colour grade, reflectance and yellowness), fibre length, uniformity of length, strength, fineness plus content of leaves, sticks etc. Hence coal dust let alone the additional dust from processing the gravel pose a potential risk to the quality and attributes that the harvested cotton displays, consequently impacting the grower's return⁵.

Cotton Australia recommends the onsite production of gravel materials be rejected because it introduces a level of dust, light and sounds currently not present in the landscape.

Mine Landforms

In Cotton Australia's view:

- Final voids are not the default option for a project and are only permissible when the ecological sustainable development benefits can be demonstrated.
- When it has been agricultural land that the mine has disturbed, the land should be fully restored to its former agricultural quality. This is in terms of quality of soil, landform and catchment hydrology, including surface and ground waters.
- Tools currently exist that can be used to assess groundwater ecosystem health before, during and after a mine project. For example, the Groundwater Health Index developed by Dr Kathryn Korbel of Macquarie University's Department of Biological Sciences and Cotton Research and Development Corporation⁶.

Cotton Australia recommends sufficient length needs to be given to the amount of time in which regulatory compliance is in play as plant and hence ecological establishment is not instantaneous. (E.g. time to investigate, repair and confirm works are sufficient to have restored the broader landscape.)

Cotton Australia recommends the community are given the opportunity to have input into the final form and use of the rehabilitated landscape.

⁴ Forthcoming CRDC publication.

⁵ Both the 2016-17 and 2015-16 CDRC grower surveys contained a question category about crop quality and attributes. It found colour was one of top three (length and leaf the others) most common causes of quality downgrades.

⁶ More details about this tool is available from https://www.researchgate.net/publication/312452217_The_weighted_groundwater_health_index_Improving_the_monitoring_and_management_of_groundwater_resources and also http://www.crdc.com.au/sites/default/files/pdf/Summer18_sc2.pdf p14.



Conclusion

These modifications further the death by a thousand blows approach Whitehaven Coal has taken for the overall project and the impacts in relation to the river Namoi and its flood plain, plus the impacts on downstream river users and their communities, not just the adjacent high value agricultural land.

Like the previous “extension” to the Vickery Mine, the total sum of these modifications amount to yet more development creep. It also reinforces Cotton Australia’s view that Whitehaven Coal’s intent all along has been to have a project with a greater magnitude of impact. Consequentially **Cotton Australia does not support the modifications proposed**. We therefore ask The Department to give due regard to our concerns on behalf of our members and the community of the Namoi Valley.

Thank you.

A handwritten signature in blue ink that reads "Jennifer Brown". The signature is fluid and cursive, written in a professional but personal style.

Jennifer Brown
Policy Officer
Cotton Australia