

Mr Scott Mitchell  
Manager – Approvals  
Whitehaven Coal Limited  
By Major Projects Portal

03/03/2025

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Subject: Narrabri Underground Mine Stage 3 – Biodiversity Credit Reduction

Dear Mr Mitchell

I refer to your letter dated 19 February 2025 advising that some areas of the Narrabri Underground Mine will no longer be disturbed under SSD-10269 and seeking a reduction in the biodiversity credit liability for those areas, as allowed for under conditions B40 of SSD-10269.

You have calculated that those areas are worth 1,616 ecosystem credits and provided a copy of correspondence from the Conservations Programs, Heritage and Regulation Group of the NSW Department of Climate Change, Energy, the Environment and Water, which indicates that that agency agrees with your credit calculations.

I agree that, provided the areas labelled “Reduction Areas” in the figures in your letter are not disturbed under SSD-10269, the relevant ecosystem credits required under SSD-10269 can be reduced.

Accordingly, as nominee of the Secretary, I approve a reduction in credits of the types and quantities shown in Table 1 of Appendix A of your letter.

Please ensure you make the document publicly available on the project website at your earliest convenience.

Yours sincerely



Stephen O'Donoghue  
Director  
Resource Assessments

As nominee of the Planning Secretary

19 February 2025

Rose-Anne Hawkeswood  
Team Leader – Resource Assessments  
Department of Planning, Housing and Infrastructure  
Via Major Project Portal

Dear Rose-Anne,

**RE: NARRABRI UNDERGROUND MINE STAGE 3 EXTENSION PROJECT (SSD-10269) – CONDITION B40 CREDIT REDUCTION**

**Introduction**

Condition B40, Schedule 2 of Development Consent (SSD-10269) requires Narrabri Coal Operations Pty Ltd (NCOPL) to consult with the Department Climate Change, Energy, Environment and Water (DCCEEW) – Biodiversity, Conservation and Science Group (BCS) regarding any application to reduce ecosystem credits specified in Table 5 of the Development Consent. We provide the following letter outlining our proposed reduction in the SSD-10269 development and reduction in the associated ecosystem credit requirement and evidence of consultation with BCS.

**Overview**

The Narrabri Mine is an existing underground coal mining operation situated in the Gunnedah Coalfield. The Narrabri Mine is located approximately 25 kilometres (km) south-east of Narrabri and approximately 60 km north-west of Gunnedah, within the Narrabri Shire Council Local Government Area, in the North West Slopes and Plains region of New South Wales (NSW).

The Narrabri Mine is operated by NCOPL, on behalf of the Narrabri Mine Joint Venture, and currently employs approximately 600 personnel. Surface development and underground mining at the Narrabri Mine has been undertaken in accordance with the Narrabri Stage 2 Project Approval (MP08\_0144).

The Narrabri Underground Mine Stage 3 Extension Project (the Project) involves the extension of the underground mining areas at the existing Narrabri Mine to gain access to additional areas of run-of-mine (ROM) coal reserves. The Project also includes an extension to the mine life, development of additional supporting infrastructure and continued use of existing infrastructure.

Development Consent (SSD-10269) for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) by the Independent Planning Commission on 1 April 2022.

Condition B40 and B41, Schedule 2 of Development Consent (SSD-10269) relevantly states the following:

*B40. If the Applicant:*

- (a) identifies that it will not proceed with a particular development (eg shortening or not developing particular longwalls or reducing the area of surface disturbance); and/or*
- (b) undertakes further targeted surveys for the Glossy-black Cockatoo that demonstrate that the credits required in Table 6 for that species exceed the impact of the development.*

*then the Applicant may seek the agreement of the Planning Secretary (following consultation with BCS) to reduce the associated ecosystem credits specified in Table 5 and/or the number of Glossy-black Cockatoo credits specified in Table 6 equivalent to the number of credits that would no longer be required.*

*B41. An application to the Planning Secretary under condition B40 must be:*

- (a) in writing and addressed to the Planning Secretary;*
- (b) submitted prior to the retirement of the relevant credits under Table 5 and Table 6;*
- (c) supported by a report which:*
  - (i) sets out the:*
    - reduction in previously predicted impacts within the area of development no longer undertaken;*
    - finding of any additional surveys for the Glossy-black Cockatoo; and*

- requested reduction/s in the credits required under Table 5 and/or Table 6; and
  - (ii) has been prepared:
    - by a person/s accredited to apply the Biodiversity Assessment Method;
    - in accordance with the Biodiversity Assessment Method; and
    - in consultation with BCS.
- to the satisfaction of the Planning Secretary.

During preparation of the Project Environmental Impact Statement (EIS), it was anticipated the Project would commence mining operations (and establishment of surface infrastructure) in 2022, with the subsequent surrendering of Project Approval (MP08\_0144) for Stage 2 in accordance with Condition A16 and A17, Schedule 2 of Development Consent (SSD-10269).

However, due to the Reconsideration Request<sup>1</sup>, commencement of the Project has been extensively delayed and establishment of surface infrastructure for the Narrabri Mine was required to be completed under Project Approval (MP08\_0144) for Stage 2. Surface disturbance cleared under Stage 2 and other reductions due to second set of main headings (i.e. 10 km long panels no longer feasible due to Stage 3 EPBC approval delay) are not required to be cleared under Stage 3.

NCOPL has identified that it does not require a particular development of surface disturbance previously approved for the Project (Figure 1) and therefore in accordance with Condition B40(a), Schedule 2 of Development Consent (SSD-10269) seeks a reduction of ecosystem credits associated with the particular development no longer required.

### **Ecosystem Credit Reduction**

Consistent with Condition B40(a), Schedule 2 of Development Consent (SSD-10269), NCOPL are seeking agreement from the Planning Secretary to reduce the associated ecosystem credits equivalent to the particular development (Table 1). Attachment A provides for the ecosystem credit calculation for the particular development no longer required.

**Table 1  
Overall Summary of NCOPL Proposed Ecosystem Credit Reduction**

Phase	Area	Ecosystem Credits
1	37.2	546
2	1.9	56
3	4.8	109
4	4.8	120
5	9.7	231
6	21.5	554
<b>Total</b>	<b>80.0</b>	<b>1,616</b>

Source: Appendix A

We look forward to a response from DPHI at the earliest opportunity regarding the proposed credit reduction.

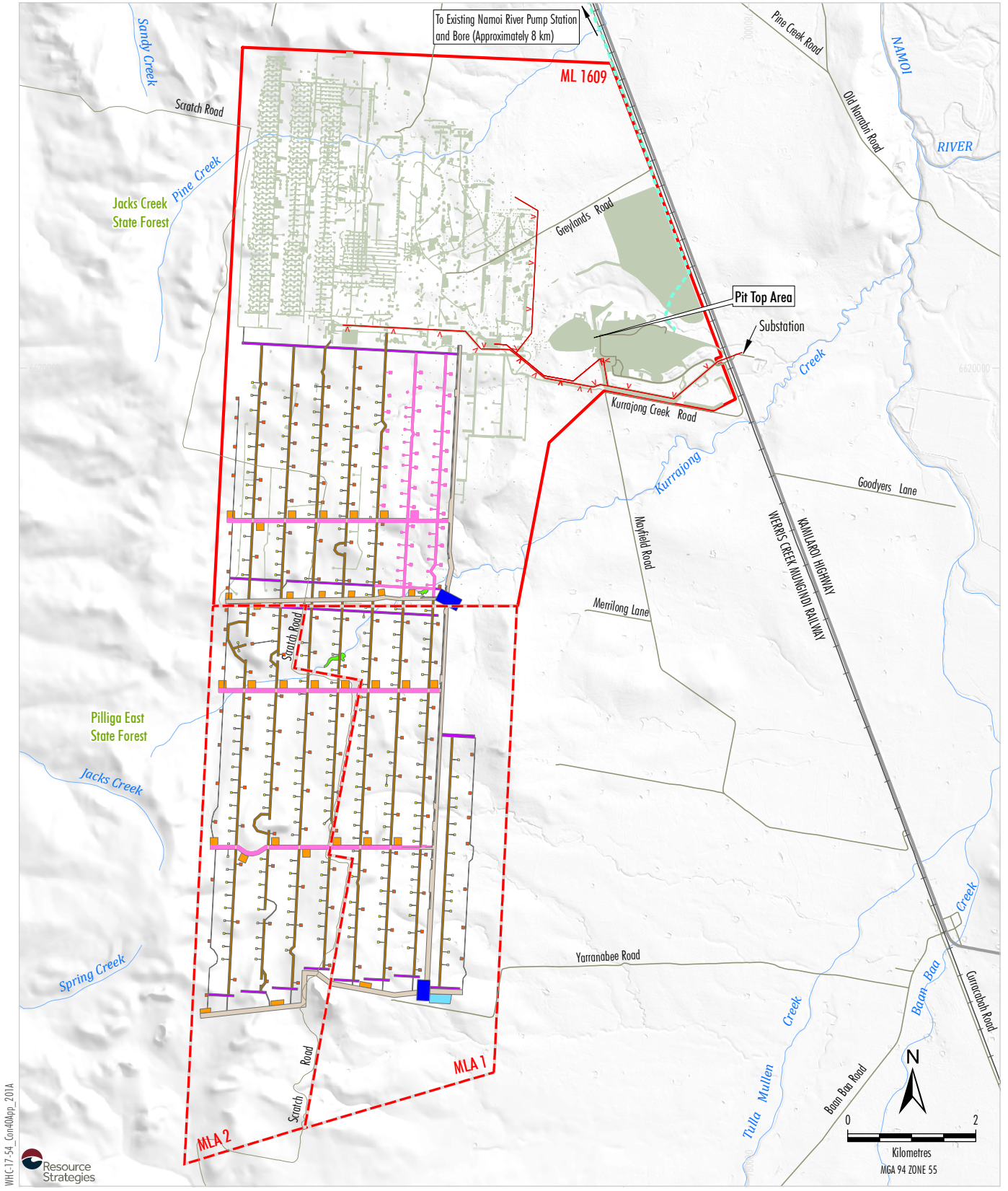
Please do not hesitate to contact the undersigned if you have any queries or would like to discuss.

Yours sincerely,



**Scott Mitchell**  
Manager – Approvals

<sup>1</sup> On 8 July 2022, Environmental Justice Australia, on behalf of the Environment Council of Central Queensland Inc, requested (under section 78A of the EPBC Act) the Minister for the Environment and Water to reconsider the Referral Decision on the basis of section 78(1)(a) of the EPBC Act (Reconsideration Request).



WHC17-54\_Cand04ppt\_201A



LEGEND			
	Mining Lease (ML 1609)		Existing/Approved Surface Development*
	Provisional Mining Lease Application Area		Services Corridor
	Electricity Transmission Line (Constructed)		Service Borehole
	Existing Namoi River Pipeline (Buried)		Exploration Borehole
	Reduction Areas		Access Track and Post-drainage Corridor
			Pre-conditioning Area
			Service Borehole and Power Reticulation
			Southern Mine Water Storage
			Ventilation Complex
			Farm Dam Decommissioning Works

Source: NCOPL (2019; 2021); NSW Spatial Services (2019)

**WHITEHAVEN COAL**  
 NARRABRI STAGE 3 PROJECT  
 Particular Development No Longer Required

Figure 1

APPENDIX A  
ECOSYSTEM CREDIT CALCULATION

# Narrabri Underground Mine Stage 3 Extension Project

## Ecosystem Credit Calculation

The ecosystem credit calculation has been prepared by Jamie Gleeson (Accredited Assessor BAAS17080) as per the requirements required by Condition B41, Schedule 2 of Development Consent (SSD-10269) and the NSW *Biodiversity Assessment Method 2020*.

### Methodology

#### 1. Vegetation Calculations ('area')

Native vegetation on the Subject land for the Project was identified and mapped by AMBS (2020) in accordance with the *Biodiversity Assessment Method 2020* (BAM) (DPIE, 2020a) and *BioNet Vegetation Classification* (DPIE, 2020b). This involved recording floristic and condition data from Vegetation Integrity Plots across the Subject land and reviewing previous vegetation mapping and ecological reports.

PCT mapping provided in AMBS (2020) was used to determine the total area (in hectares) of PCTs that would be cleared, should disturbance be undertaken for the particular development no longer required. This was calculated by overlaying the spatial data provided by NCOPL on the AMBS (2020) PCT mapping via ArcGIS software.

#### 2. Ecosystem Credit Calculations

To calculate the total number of ecosystem credits associated with the 'particular development no longer required' (Figure 1), Equation 1 and the steps outlined in Section 10.1.2 of the BAM was applied:

**Equation 1** *Determine the number of ecosystem credits required for the impact on vegetation that is a TEC, contains threatened species habitat, or is any other PCT*

$$\text{Ecosystem credits required for each vegetation zone} = \sum_{i=1}^n (\Delta VI \text{ Loss} \times BRW \times \text{area}) \times 0.25$$

where:

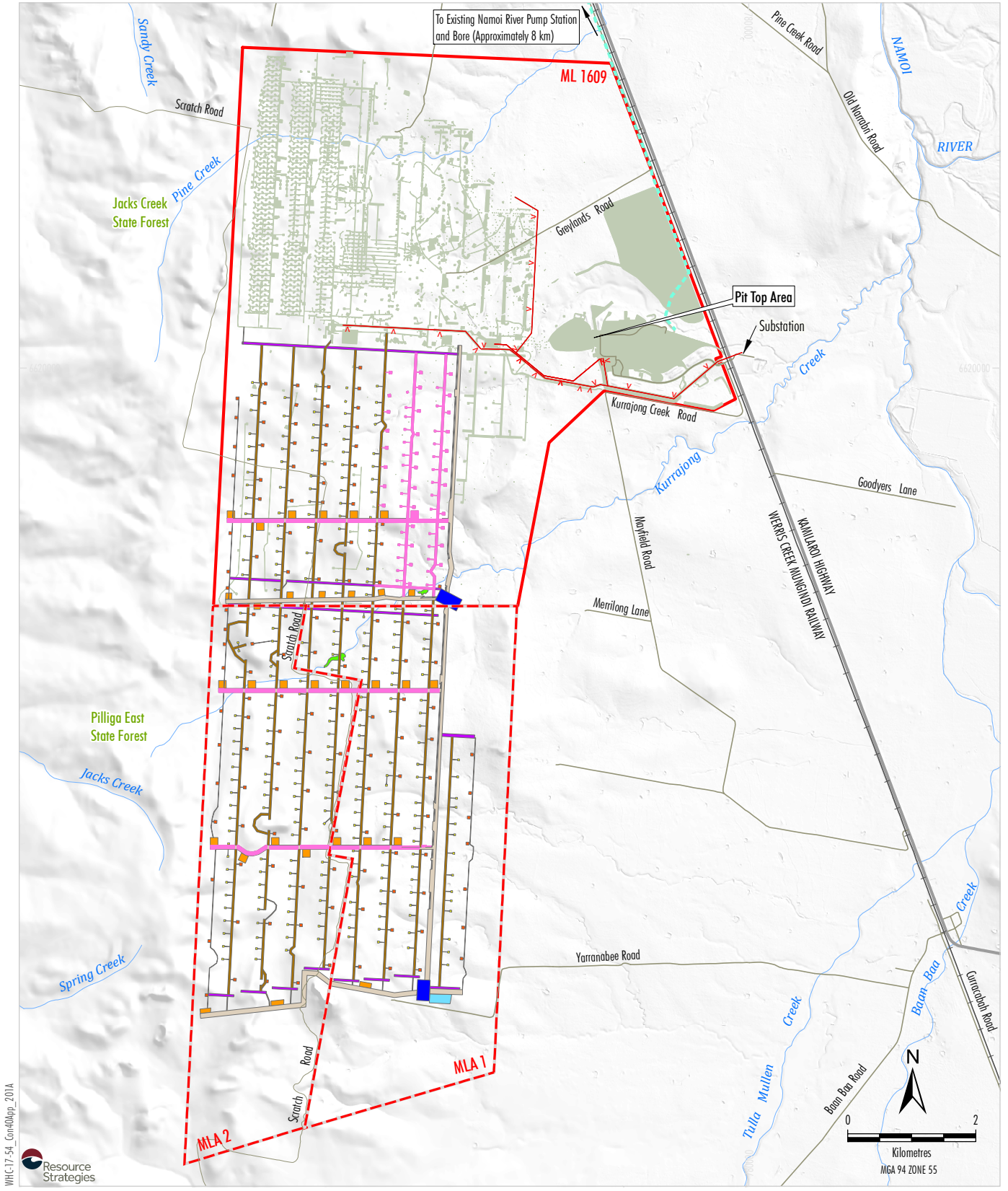
*i* = the *i*th vegetation zone on land directly impacted by the proposal

*ΔVI Loss* = the change (loss) in the vegetation integrity score of a vegetation zone at the development site as determined by Equation 27

*BRW* = means the biodiversity risk weighting applied to the vegetation zone. The biodiversity risk weighting for a TEC or a PCT containing threatened species habitat is based on the sensitivity to loss class of the TEC/PCT and the highest sensitivity to gain class of the predicted threatened species. For a PCT or TEC not associated with threatened species habitat, the sensitivity to loss class for the PCT or TEC is used with the low sensitivity gain class.

*area* = the area in hectares of the vegetation zone

An excel spreadsheet was used to apply Equation 1 to calculate the total ecosystem credits associated with the 'particular development no longer required' (Figure 1), which is provided in Attachment 1.



WHC17-54\_Cand04ppg\_201A



LEGEND	
	Mining Lease (ML 1609)
	Provisional Mining Lease Application Area
	Electricity Transmission Line (Constructed)
	Existing Namoi River Pipeline (Buried)
	Reduction Areas
	Existing/Approved Surface Development*
	Services Corridor
	Service Borehole
	Exploration Borehole
	Access Track and Post-drainage Corridor
	Pre-conditioning Area
	Service Borehole and Power Reticulation
	Southern Mine Water Storage
	Ventilation Complex
	Farm Dam Decommissioning Works

Source: NCOPL (2019; 2021); NSW Spatial Services (2019)

**WHITEHAVEN COAL**  
 NARRABRI STAGE 3 PROJECT  
 Particular Development No Longer Required

Figure 1

**Ecosystem Credit Summary**

Table 1 summarise the ecosystem credit calculations provided in the excel spreadsheet (Attachment 1).

**Table 1  
Ecosystem Credits for the Particular Development No Longer Required**

Credit Type	Ecosystem Credits						
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Total
PCT 88 Pilliga Box - White Cypress Pine - Buloke shrubby woodland in the Brigalow Belt South Bioregion	302	2	0	29	2	0	<b>335</b>
PCT 141 Broombush - wattle very tall shrubland of the Pilliga to Goonoo regions, Brigalow Belt South Bioregion	0	0	0	0	0	0	<b>0</b>
PCT 435 White Box - White Cypress Pine shrub grass hills woodland in the Brigalow Belt South Bioregion and Nandewar Bioregion	6	0	0	6	17	0	<b>29</b>
PCT 399 Red gum - Rough-barked Apple +/- tea tree sandy creek woodland (wetland) in the Pilliga to Goonoo sandstone forests, Brigalow Belt South Bioregion	0	0	0	0	0	38	<b>38</b>
PCT 401 Rough-barked Apple - Blakely's Red Gum - Black Cypress Pine woodland on sandy flats. mainly in the Pilliga Scrub region	1	0	0	0	0	0	<b>1</b>
PCT 404 Red Ironbark - White Bloodwood +/- Burrows Wattle heathy woodland on sandy soil in the Pilliga forests	42	0	79	9	41	321	<b>492</b>
PCT 405 White Bloodwood - Red Ironbark - Black Cypress Pine shrubby sandstone woodland of the Pilliga Scrub and surrounding regions	0	0	30	37	169	195	<b>431</b>
PCT 406 White Bloodwood - Motherumbah - Red Ironbark shrubby sandstone hill woodland / open forest mainly in east Pilliga forests	16	0	0	23	0	0	<b>39</b>
PCT 408 Dirty Gum (Baradine Gum) - Black Cypress Pine - White Bloodwood shrubby woodland of the Pilliga forests and surrounding region	0	0	0	0	2	0	<b>2</b>
PCT 244 Poplar Box grassy woodland on alluvial clay-loam soils mainly in the temperate (hot summer) climate zone of central NSW (wheatbelt)	39	2	0	0	0	0	<b>41</b>
PCT 55 Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions	140	52	0	16	0	0	<b>208</b>
PCT 206 Dirty Gum - White Cypress Pine tall woodland of alluvial sand (sand monkeys) in the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	0	0	0	0	0	0	<b>0</b>
<b>Total</b>	<b>546</b>	<b>56</b>	<b>109</b>	<b>120</b>	<b>231</b>	<b>554</b>	<b>1,616</b>

**References**

AMBS Ecology and Heritage (2020). *Narrabri Underground Mine Stage 3 Extension Project – Flora Survey Report*. Prepared for Narrabri Coal Operations Pty Ltd.

Department of Planning, Industry and Environment (2020a). *Biodiversity Assessment Method*.

Department of Planning, Industry and Environment (2020b). *BioNet Vegetation Classification*.



ATTACHMENT 1

SPREADSHEET

**Table 1 - Overall Summary of NCOPL Proposed Credit Reduction**

Phase	Area*	Ecosystem Credits
1	37.2	546
2	1.9	56
3	4.8	109
4	4.8	120
5	9.7	231
6	21.5	554
<b>Total</b>	<b>80.0</b>	<b>1,616</b>

\* Based on the Footprint provided by NCOPL (3-4-24) as shown in Figure 1 of the Main Text.

**Table 2 - NCOPL Proposed Credit Reduction Applied to Condition B39**

Credit Type	Credits Required (Condition B39)							NCOPL Proposed Credit Reduction							Revised Credit Requirement						
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Total	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Total	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Total
PCT 88 Pilliga Box - White Cypress Pine - Buloke shrubby woodland in the Brigalow Belt South Bioregion	640	722	66	222	81	207	1,938	302	2	0	29	2	0	335	338	720	66	193	79	207	1,603
PCT 141 Broombush - wattle very tall shrubland of the Pilliga to Goonoo regions, Brigalow Belt South Bioregion	0	0	0	0	0	8	8	0	0	0	0	0	0	0	0	0	0	0	0	8	8
PCT 435 White Box - White Cypress Pine shrub grass hills woodland in the Brigalow Belt South Bioregion and Nandewar Bioregion	74	270	0	90	33	91	558	6	0	0	6	17	0	29	68	270	0	84	16	91	529
PCT 399 Red gum - Rough-barked Apple +/- tea tree sandy creek woodland (wetland) in the Pilliga to Goonoo sandstone forests, Brigalow Belt South Bioregion	0	0	36	30	172	94	332	0	0	0	0	0	38	38	0	0	36	30	172	56	294
PCT 401 Rough-barked Apple - Blakely's Red Gum - Black Cypress Pine woodland on sandy flats, mainly in the Pilliga Scrub region	20	0	79	8	4	0	111	1	0	0	0	0	0	1	19	0	79	8	4	0	110
PCT 404 Red Ironbark - White Bloodwood +/- Burrows Wattle heathy woodland on sandy soil in the Pilliga forests	220	0	864	113	586	3439	5,222	42	0	79	9	41	321	492	178	0	785	104	545	3118	4,730

PCT 405 White Bloodwood - Red Ironbark - Black Cypress Pine shrubby sandstone woodland of the Pilliga Scrub and surrounding regions	0	0	220	196	738	971	2,125	0	0	30	37	169	195	431	0	0	190	159	569	776	1,694
PCT 406 White Bloodwood - Motherumbah - Red Ironbark shrubby sandstone hill woodland / open forest mainly in east Pilliga forests	18	0	0	283	302	249	852	16	0	0	23	0	0	39	2	0	0	260	302	249	813
PCT 408 Dirty Gum (Baradine Gum) - Black Cypress Pine - White Bloodwood shrubby woodland of the Pilliga forests and surrounding region	0	0	0	0	3	0	3	0	0	0	0	2	0	2	0	0	0	0	1	0	1
PCT 244 Poplar Box grassy woodland on alluvial clay-loam soils mainly in the temperate (hot summer) climate zone of central NSW (wheatbelt)	31	111	0	0	0	301	443	39	2	0	0	0	0	41	-8	109	0	0	0	301	402
PCT 55 Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions	144	514	0	29	0	120	807	140	52	0	16	0	0	208	4	462	0	13	0	120	599
PCT 206 Dirty Gum - White Cypress Pine tall woodland of alluvial sand (sand monkeys) in the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	0	0	0	48	0	0	48	0	0	0	0	0	0	0	0	0	0	48	0	0	48
<b>Total</b>	<b>1,147</b>	<b>1,617</b>	<b>1,265</b>	<b>1,019</b>	<b>1,919</b>	<b>5,480</b>	<b>12,447</b>	<b>546</b>	<b>56</b>	<b>109</b>	<b>120</b>	<b>231</b>	<b>554</b>	<b>1,616</b>	<b>601</b>	<b>1,561</b>	<b>1,156</b>	<b>899</b>	<b>1,688</b>	<b>4,926</b>	<b>10,831</b>