**REPLY TO WHITEHAVEN COAL STATEMENT OF MARCH 5 by DR JOHN HUNTER**

A media Release on Wednesday 5th of March 2014 provides statements that imply that the assessment of mapping of offsets in the Mt Lindsey and Wirradale properties form part of an undignified attack of Dr Robertson’s reputation. I personally have no previous involvement with work conducted by Dr Robertson and have not met him in person.

During my assessment it was irrelevant to me who conducted the previous mapping as this was irrelevant to the methods used and results obtained. I appreciate that Dr Robertson has on numerous occasions been involved in panels where he has been called upon to provide expert knowledge within his realm of experience.

I personally have not made any form of undignified attack on Dr Robertson or his reputation. I am not a member of any organisation that has made any aspersions or assumptions about Dr Robertson’s abilities. I have not been a member of any protest movements or picket lines in regards to the offsetting process nor made any previous comments or aspersions in relation to Whitehaven Coal.

My professional career contains numerous examples of working with extractive industries in terms of offsetting, examples include: CSG Spring Gully – Origen Energy, Vickery Coal (numerous occasions), Lake Cowal Gold Mine, Stratford Coal Mine, Bemax Mineral Extraction, Nabiac Mining and Ruby Mine – Barrington Tops.

The works undertaken in terms of Whitehaven offsets were conducted from the perspective of an **unbiased** assessment of the validity of mapping polygons and the interpretation of defined threatened ecological communities regardless of how or who created the mapping I was assessing. The methodology used was a standard technique to provide a preliminary assessment of accuracy. This type of assessment does not need to be of the same standard or intensity of the original mapping. The method used included unbiased placement of survey sites throughout mapped areas (sites placed roughly every 300 m along a meander in order to counteract bias in placement). At each site the dominant species were noted in up to three strata and cover of each of these were recorded along with photographs. Assessment of mapping was not limited to the sites placed as areas were viewed between sites for anecdotal evidence of compliance with mapped entities. To date approximately 27% (1,800 ha) of the approximately 6,700 ha contained within the Mt Lindsay and Wirradale properties has been assessed. The validation of mapping polygons showed such a high error that it is difficult not to make the assessment that a similar error rate exists across the rest of the lands within the same properties.

There would be few in NSW who have as extensive experience in mapping vegetation and assessing mapped vegetation as myself. Furthermore my experience within the region of the Liverpool Plains and the Mt Kaputar area is extensive, having been involved in the survey and mapping of most of the lands managed by National Parks and also having surveyed and mapped many offset properties for other coal extractive companies within the Liverpool Plains and surrounds.

The media release states that the assessment I was involved in is biased as it has not assessed the 15 other properties that form part of the offset package. I would welcome the opportunity to provide independent assessment of the remaining fifteen properties. The assessment undertaken by myself was the latest in a series of assessments made by relevant local ecological experts, none of which as far as I am aware made any assessments only from the roadside.

I personally was not asked to provide comment on the context of the offsets package or its genesis, only the validity of the mapping and assessment of the extent of the CEEC. If the offsets package is based on the validity of this mapping and the proposed extent of the CEEC then there is likely to be a serious issue in regards to meeting the requirements of the package. If Whitehaven would like me to independently assess these issues I would be pleased to do so. However it should be remembered that the report I prepared was solely on the validity of the mapping and CEEC assessment. This assessment was by no means, or in anyway done, in an unfavourable or biased way.

Based on the information obtained it is difficult to understand the level of disparity between the mapped entities and their inclusion within proposed CEEC criteria and what was found in the field during my, and previous ecologist’s assessments. I however pass no judgement on how or where this error or disparity has occurred as I have not been made aware of the methodology that was used. Again the assessment I made was one of an unbiased perspective and no judgements are made as to who or why differences in outcomes have occurred. Simply though, there is a very high disparity in the following;

1) There is little congruence between the mapped entities and what is found on the ground within those polygons.

2) The mapped names and the dominant species do not include most of the frequent and dominant assemblages found on the ground

3) the inclusion of communities that clearly do not meet the CEEC criteria is baffling. This is particularly an issue as mapping of CEEC should be done at an accuracy of one hectare. This clearly not been achieved.

Sincerely,

Dr John T. Hunter

7th March, 2014