

Submission
Independent Planning Commission of NSW
Moolarben Coal Mine Stage 1 MOD 14 and Stage 2 MOD 3

This submission is on my own behalf as an impacted local resident with property fronting the Goulburn River downstream from the three large coal mining operations on our doorstep.

Just a little bit of background on my experience with NSW Government water planning processes and environmental regulation.

I held a position as community environmental representative on the Hunter River Management Committee that developed the rules for the Hunter Regulated River Water Sharing Plan and the Hunter Unregulated and Alluvial Water Sharing Plan.

I was a trustee on the Hunter Catchment Management Trust until it was disbanded in 2004.

I was also a community environmental representative on the EPA Board until it was disbanded in 2011.

I have been raising the issue of mining impacts on the Goulburn River in these forums for the last 20 years and more.

There has been concern expressed among industry players in the region that the Goulburn River is not included in the Hunter River Salinity Trading Scheme and that management of mine interception and water discharge has been unsatisfactory.

The application for mine expansion on the headwaters of this major tributary of the Hunter appears to continue unabated and propped up by support from Government planners.

The community knows that the environment agencies, OEH and EPA and the water managers in Dol Water, are under constant pressure to negotiate compromised outcomes to allow coal mining projects to get through the approvals process.

The Independent Planning Commission is the only body to stand above political pressure.

We rely on you to take a bigger picture look at the cumulative impacts of these large mining footprints and the permanent damage being perpetrated on water sources.

It seems to be a form of suicidal madness to be approving increased greenhouse gas emissions while further destroying critical water sources at a time when more intense droughts and water shortages are worsening through carbon intensive climate change.

I have lived in this area for almost 50 years. Well before any large scale mining operations were approved. The degradation of the Goulburn River over the past 30 years has been very evident.

When the Ulan mine was first approved in the mid 1980's it was touted as the largest coal mine in the southern hemisphere. Ulan now has approval to mine 20 mtpa and has caused significant damage to the river.

It took community campaigning from 1994 to get limits placed on water discharges and salinity levels. It took until 2010 with the approval of the large Ulan West expansion for a condition of approval to require Glencore to rehabilitate the river diversion. This work has finally been completed.

I am also a community member on the three Community Consultation Committees or CCCs that operate at the three local mines: Ulan, Wilpinjong and Moolarben. The relationship between the three companies and inter connected impacts on the community and environment is highly complex and often poorly managed. The lack of transparency around various arrangements signed off by Government is disturbing.

In regard to the ongoing decline of the health of the Goulburn River, it should not be impacted by any more additional salt load. As a landowner with basic rights, the increasing salinity levels in the river threaten my soil, stock and domestic appliances.

The EC limit for the current volume of mine water discharge should be reduced to 500 EC to match the latest approval at the Wilpinjong Mine. There should be no additional volumes approved for discharge from Moolarben.

It is important, as stated by a number of presentations today, that mine water discharge into the river system be carried out under a set of rules that provide for seasonal hydrological needs of the river and its dependent ecosystems. Water reporting to the mines is from the surrounding landscape. Replacement flows to the river need to provide environmental benefit.

Currently the three mines have approval to discharge water into the environment when it suits mining operations. This water management needs to be turned on its head so the water released from the mines occurs when the river needs the flow. This should be triggered by the antecedent conditions in the catchment, particularly during times of low and medium rainfall events.

The community has been calling for an independent water study of mining impacts on the Goulburn River for at least the last 20 years.

It is heartening to see that the EPA has recommended this in regard to water quality management and that DPE has also recognised the need.

This study must be done to inform the decision-making process and not post approval. It should also include consideration of the environmental flow releases needed to improve the hydrological health of the river.

You have heard a bit about trains today. I am constantly impacted by train noise at night. The ARTC and EPA assessment tool of impacts up to 500m from the line is not appropriate for rural areas with no background noise levels. We have the train noise echoing off the high sandstone escarpment in our valley and it is highly disturbing at 1am, 2am, 3am in the morning.

I also find myself more frequently held up by very slow train movements across level crossings. This occurred last Friday when I was travelling into Mudgee to attend the funeral of the last teacher at Wollar School which closed in December last year because of the social impacts of the Wilpinjong Mine.

The Sandy Hollow Rail Line is already dangerously over loaded with coal trains and has no capacity to take more. An increase in coal production cannot be approved because Moolarben coal stockpiles are already full.

It is time that some balance is brought back into the decision-making process so that social and environmental impacts are given the same weight as perceived economic benefit.

The key beneficiary of the proposed modifications is Yancoal. This is backed up by DPE in the executive summary of the final assessment report that states that increase production limits would allow annual revenue to increase. There are no additional social benefits through increased employment and the proposed royalties cannot be assured.

The social and environmental impacts of the increased coal production will not be mitigated.

By all means approve the reverse osmosis plant and the proposal to eliminate the Open Cut Pit 3 overburden emplacement. But please do not increase the approved discharge volume and reduce the salinity limit to 500 EC.

Commission the independent water study to inform your decision-making. This should also include a rigorous reassessment of the newly predicted inflows into Moolarben underground workings and their environmental impacts on regional groundwater systems.

This application to modify Moolarben Stage 1 and Stage 2 approvals gives you, Commissioners, the ideal opportunity to fix what is wrong with this poorly assessed mining complex and its current inadequate conditions that have not managed its impacts.

As the final determining body, you have the power to strengthen the conditions of approval so that they better manage the significant impacts of this giant mining operation.