

**WOLLAR PROGRESS ASSOCIATION**

**C/O- POST OFFICE**

**WOLLAR NSW 2850**

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**Submission**

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

Mudgee Public Meeting  
Tuesday 2 April 2019

Wollar Progress Association lodged a submission of objection to this Moolarben Mine modification proposal in November 2018.

In that submission the Wollar community raised a number of issues that we believe have not been properly addressed in Yancoal's response to submissions report or in the Department of Planning and Environment Assessment Report that recommends you approve this mine expansion.

Firstly, we raised the issue of the increasing number of coal trains in our area.

We note that the response to our objections is to flick the issue to the Australian Rail and Track Corporation known as the ARTC. We also note that the ARTC is not an agency that is directly involved in the planning engagement process for the large mines in our area like the road managers, Roads and Maritime Services.

The Wollar Progress Association has had many unsatisfactory communications with the ARTC over problems caused by coal trains on the Sandy Hollow Rail Line that passes through Wollar.

Just because Yancoal has received a letter assuring them that the ARTC is happy to sell them more rail access on the Sandy Hollow Rail Line doesn't mean that anyone has seriously considered or assessed the increased impacts of more coal trains on the community or on the ability of the line to carry the additional load.

I and my wife and many of our neighbours have had our access blocked at the Mogo Rd rail crossing in Wollar which is the only access road to our property. Stationary trains can block the road for up to 20 minutes. This is very inconvenient for people trying to get home before dark or trying to get to town for appointments. We have also had access blocked for emergency service vehicles and bushfire brigade volunteers.

A comprehensive planning process, that we trust you Commissioners have been employed to carry out, should assess the impact of more coal trains on the community and also review ARTC management of the rail line.

We note that the Department's assessment of this issue repeats word for word the response given by Yancoal. The fact that Yancoal received a letter from the ARTC in October 2017 confirming

that sufficient rail capacity is available for increased rail movements is immaterial to the assessment of the increased impacts of additional trains. It seems that no-one has done this assessment.

We have reason to believe that the line is already over capacity and the ARTC is struggling to keep it maintained to a safe level. There have been two derailments of Moolarben coal trains in the last few years.

Both Yancoal and the Department outline the constraints on the line caused by the Bylong tunnel.

We believe this is the very issue that is causing trains to be stopped across the Mogo Rd crossing. The rail loops before the tunnel are already holding trains or they have been slow in leaving them. This causes a backlog that no-one appears to manage. More trains on the line will only make the matter worse.

There has been no additional consideration of this issue. We implore you Commissioners to look more closely at the management of this rail line.

The second issue relating to more trains on the line is more train noise.

The Department's assessment report incorrectly states that the increased noise from additional trains would be below the relevant criteria. The EIS noise assessment states that the noise levels from current coal train numbers are already above the Rail Infrastructure Noise Guidelines.

The Wollar district is a rural area with very low background noise levels. An increase in train noise, of at least 2 decibels above the already disturbing train noise levels, will definitely be noticed. Particularly at night and particularly by the community members who are regularly woken during the night by very loud passing trains.

This sleep disturbance increases during the winter months on still frosty nights with air temperature inversions.

There is currently no monitoring of rail noise on the Sandy Hollow Rail Line. Our submission suggested checking the real time noise monitors set up at various locations around the district to monitor mine noise from the Wilpinjong Mine. These are a source of information that should be used to verify actual train noise during daytime and at night.

This suggestion has been ignored by the Yancoal response report and the Department's assessment report.

Wollar Progress Association requests that an independent assessment of the impact of more coal trains is undertaken.

The second main issue we raised was the deteriorating condition of the Goulburn River. Many of our local residents have properties with river frontage. We have lived in the district for much longer than the large coal mines now operating in the river catchment.

The combined impact of the Ulan, Wilpinjong and Moolarben mines that intercept surface runoff and groundwater has been very evident over time.

The flows in the Goulburn River have changed a lot.

Yancoal's response to submissions report does not cover all the problems we raised and they are not addressed in the Department's Assessment Report.

We raised the noticeable change in the ecology of the river due to water releases from the Ulan Mine that do not match the prevailing weather conditions. While we agree it is important to replace the lost base flows, any larger discharges during dry times should happen with rainfall.

The current discharges from Ulan Mine have caused a high growth of algae in some stretches of the river, never seen before.

An assessment of impacts of additional flows during dry times from the three mines has not been done.

At the other end of the scale, it is more likely that the proposed 65 megalitres per day from the three mines will be released during high flow periods in wet weather conditions.

We raised the issue of loss of access due to prolonged flood flows. The response to submissions does not take into account the internal property access issues. A number of our local residents have low level river crossings to access their property. These are on the river upstream of the major tributary inflows into the Goulburn River.

The issue for flood water flows is not only the height of the water. It is also the speed of the flow. This has not been assessed. Additional releases of water into high flows of up to 65 megalitres per day will increase the flow rate.

The issue of prolonged flood flows due to additional releases has also not been addressed.

The response to submissions under issue B3 does not address river heights or flow rate with a discharge of 65 megalitres. It only measures the potential height of the proposed 20 megalitres from Moolarben Mine at 9.4km downstream from the discharge point.

The problem of increased salt load in the Goulburn River has also not been fully addressed. While it is an improvement that the EPA has managed to negotiate the EC level down from 900 to 685, this is still a highly compromised outcome.

Wilpinjong Mine has accepted a salinity limit of 500 EC. This precedent has now been set and should be implemented in the Environment Pollution Licences for both the Moolarben and the Ulan Mines.

At times when mine water is the only flow in the Goulburn River, there have been salt slicks on the riverbanks for up to 25km downstream. A salt load of up to 30 tonnes per day from the mines is unacceptable and must not be approved.

The disturbance of salts in the landscape is a major legacy of the coal mining industry that is not being properly assessed or managed.

Many of us in the Wollar area rely on the Goulburn River for domestic use, gardens and stock water. Increased levels of salt over the years of increased mining activity upstream has been very noticeable.

Wollar Progress Association strongly objects to the approval of any additional discharge from Moolarben Mine. We have not experienced the impacts of the current 10 megalitres approved for discharge because it has not yet been used.

The key argument for an additional 10 megalitres is the additional water inflow into the Underground 4 mine. This new volume has only just been discovered through an updated groundwater model.

The environmental impacts of this increased water flow have never been assessed. Underground 4 was approved 12 years ago on the basis of very poor water modelling.

The likely increase in loss of base flows and groundwater draw down under the new scenario has not been assessed. This issue is of great importance to downstream water users in the Wollar community.

Wollar Progress Association wishes to make four recommendations to the Commission:

1. That an independent study of the impact of additional trains on the Sandy Hollow Railway Line be conducted, including both the proposed trains from the Bylong Mine and from Moolarben Stage 1 MOD 14 and Stage 2 MOD 3.
2. That no additional water discharge from Moolarben Coal Mine be approved and that the current allowable volumes be managed under environmental flow rules attached to the EPL.
3. That the EC level of mine water discharge be lowered to 500 EC in the EPL.
4. That the approval for Moolarben Underground 4 be overturned until a full independent assessment of the surface and groundwater impacts is done.

Bruce Hughes  
President