Dear Sir/Madam,

We restate our very strong objection to the Bylong Coal Project. This proposed development even with its minor amendments will have significant impacts at both the local and State level and should be rejected outright. We are of the opinion that it is not in the best interests of anyone in NSW or the overall national interest.

The Ryde-Hunters Hill Flora & Fauna Preservation Society is a community-based conservation group formed 50 years ago. Our membership is actively engaged with a range of local projects as well as the broader issues of environmental protection and management of natural resources. We have wide experience and involvement in pursuing environmental advocacy as well as in bush regeneration and preservation of habitat corridors and native vegetation. We also engage with our local community through a program of outreach events with an educational component.

As a Sydney based conservation group our members are becoming increasingly concerned at the loss of prime agricultural land and groundwater across NSW through underground mining activity such as proposed at Bylong in this application.

Incremental loss of farmland will affect ultimately Sydney’s food security and the State’s export opportunities for the future. The impact of degraded and depleted groundwater supplies through excessive water use by mining is devastating for communities that directly rely on this water. In the case of Bylong, which has been known to run out of even drinking water, there is a close connectivity between ground and surface waters and precious water supplies must be prioritised for the town and local farmers’ needs.

Previous assessment of the project determined that the landscape of the Bylong Valley would be permanently destroyed by the proposed mine. We do not feel that the revised plan will alleviate these previously identified impacts. Mining activity will still dominate absolutely and agricultural and pastoral activities “disappeared”; tourism opportunities will be removed; biodiversity will be lost; communities will be destroyed and/or experience a serious reduction in their amenity and the health of their inhabitants; Aboriginal and European cultural heritage destroyed and critically water security jeopardised.

The cost of ensuring water supplies to regional towns which have no water requires State/Commonwealth government assistance - towards which
Sydneysiders’ taxes will contribute, not mining companies such as Kepco which is proposing to use over 75% of the local water supply for the mine. We find this an unacceptable and irresponsible use of water in areas where cyclical droughts hit hard. Whilst we accept drought relief as a shared responsibility we do not accept poor decision making by the State government in regards to B long’s water usage which will ultimately leave the town without clean water to drink and use during drought times.

The people of NSW have shared cultural and natural heritage. The history of small regional towns of NSW and their town graveyards, churches and homesteads are intrinsic to our shared cultural heritage. The rich Aboriginal cultural heritage around B long with its ochre quarry, grinding grooves and rock shelters is also part of this shared heritage. The loss of shared Aboriginal and European heritage is a loss for our members and all of NSW. We find the significant destruction of cultural heritage as proposed in this development totally unacceptable.

Our members also oppose absolutely the loss of natural heritage which is proposed with this project. The destruction of nationally and state significant flora and fauna which will occur if it is approved by the State government would demonstrate an irresponsible and careless environmental planning and assessment process in NSW.

It is impossible to “offset”/”mitigate” critically endangered vegetation and the many threatened species which rely on it as habitat or relocate special soils which occur in limited area. The protection of the state’s biodiversity and the State government’s responsibilities under Commonwealth threatened species legislation must be taken seriously by the State government on behalf of all the people of NSW.

Further, the proposed life of the B long Coal Mine is 14 years beyond 2030, the year that the Intergovernmental Panel on Climate Change reported that global use of coal must be phased out in Australia as part of international efforts to avoid global warming above 1.5°C. NSW must recognise its responsibilities as part of Australia’s commitments to the Paris Agreement and make serious efforts to avoid further damage arising from increased global warming.

In conclusion, we find the social, cultural and environmental destruction which will be caused by this mine, even as it has been amended, to be unacceptable and unnecessary. Our members have no confidence that the un-tested mitigation measures proposed by Kepco will work. Rehabilitation of other underground mine sites has failed and approved rehabilitation is often impossible to implement when extraction ceases. The loss of prime agricultural lands, cultural heritage and nationally protected species is a loss not just to our members but to all Australians. The impacts of the mine on local transport networks has not been adequately assessed nor are the vehicle movement increases fair to small communities such as nearby Wollar.

We urge that this application be rejected in its entirety. No amount of “strictest conditions” will mitigate and manage the destruction proposed with this development.

Yours sincerely
Cathy Merchant
Vice President