**SUBMISSION REGARDING THE PROPOSED BYLONG COAL MINE PROJECT**

Monday 12 November 2018

I wish to object to the proposed open cut and underground Bylong coal mine in the Bylong Valley.

The reasons for my objection relate to the mine’s impact on:

(1) prime agricultural land

(2) groundwater and surface water

(3) high biodiversity values

(4) Aboriginal and European cultural heritage and

(5) climate change

**1 Impact on prime agricultural land**

 The Bylong Valley is prime agricultural land, producing beef, lucerne hay and other crops. Australia does not have a large amount of prime agricultural land and any it does have should be preserved for agriculture, not damaged by mining.

 The amended plan will result in the direct loss of 400 hectares of biophysical strategic agricultural land (BSAL) overlaying good ground water. It is extremely unlikely that this loss can be redressed by Kepco’s proposed rehabilitation. There is no precedent for this scale of prime land reconstruction anywhere.

**2 Impact on groundwater and surface water**

 Farmers attending the IPC public meeting at Mudgee on 7 November 2018 made the point that there could either be mining in the Bylong Valley or agriculture but not both. There was not enough secure water for both enterprises.

 The Department of Planning’s final assessment report does not adequately consider the threats to the Bylong River and its connected groundwater, or threats to other water users and agricultural production that are posed by the mine.

 The local community is extremely concerned about the impact of the mine on both groundwater and surface water and have little confidence in the current water model and the peer review process. An independent review process needs to be implemented that tests the assumptions of the water model before the project is determined.

**3 Impact on high biodiversity values**

 The proposed mine will clear 691 hectares of native vegetation, an area with exceptionally high biodiversity values. The proposed offset arrangements will not be able to replicate the type of ecosystem it is to replace nor compensate for the destruction of habitat for the great variety of flora and fauna, including endangered and threatened species that currently inhabit the area.

 Nationally endangered species that have been recorded in the Bylong Valley include the Regent Honeyeater, Brush-tailed Rock Wallaby, the Spotted-tailed Quoll and the New Holland Mouse. There is also a significant area of critically endangered Grassy Box Woodland that would be destroyed if the mine were to go ahead. The cumulative loss of threatened species habitat, especially of the critically endangered Regent Honeyeater, has not been assessed.

**4 Impact on Aboriginal and European Cultural Heritage**

 The expected impacts to Aboriginal cultural heritage have not been properly assessed even though the Commission’s review stated that ‘further investigation remains to be completed to properly assess the expected impacts to Aboriginal cultural heritage’.

 The independent report commissioned by the Heritage Council found that both the Bylong Scenic Landscape and Tarwyn Park, the birthplace of Natural Sequence Farming, qualified for state heritage listing. However, in its advice to the Department of Planning, neither was recommended by the Heritage Council.

**5 Impact on Climate Change**

 On 8 October this year, the United Nations Intergovernmental Panel on Climate Change (IPCC) stated that urgent change is needed to keep global warming to a minimum of 1.5 degrees Celcius. Amongst other actions, carbon pollution would need to be cut by 45% by 2030 and be reduced to zero by 2050. This means it is critical that the world reduce its dependency on coal. and phase it out by 2050. If approved, the Kepco mine could operate until 2044. This is inconsistent with Australia’s obligation to reduce its use of fossil fuels as a result of signing the Paris climate agreement. As a wealthy nation, Australia has a responsibility to reduce its carbon emissions well before 2050 and its states should not approve any new coal mines.

I thank the Commission for providing me with the opportunity to make this submission.

Hilary Crawford

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