

Dear Independent Panel Members,

Thank you for this last opportunity to register my objection to the Kepco Bylong coal project.

I fully concur with speakers at the public hearing concerned about the threats and risks from this mining proposal to the future resilience and viability of Bylong and Goulburn River systems and connected groundwater. With the strata broken, shattered and overturned and with the underlying water flow paths drained and redirected this country cannot ever be the same after mining. Without water the land effectively is sterilized for all but short term opportunistic uses during rainy periods. If this coal mining proposal goes ahead, one more precious fertile valley will be permanently degraded as the 400 ha of agricultural land consisting of fertile soils overlaying good groundwater cannot be rebuilt or rehabilitated. Likewise the proposed reconstruction of 65 ha of critically endangered ecological community on the rehabilitated open cut mine site is an unproven risk. There are no precedents to show land reconstruction on this scale is achievable without costly ongoing interventions [i.e. once they stop watering it and managing the weeds everything collapses with the next drought].

The potential impact of subsidence from the underground mine has been underestimated and is acknowledged to be a problem. Looking up from the proposed project area vicinity one can behold the awe-inspiring jumble of airy cliff lines and magnificent tree-clad rocky ridges all around; it is obvious to any who have witnessed the effects elsewhere that modern coal operations [known to involve years of vibration, explosions, many metres depth of subsiding rock strata collapse and “unexpected” earthquake like high-wall collapses or far field movements] should not be allowed anywhere near. Put simply, mining in the Bylong Valley is too big a risk. Once cliff lines fall and the escarpment forests are cracked and drained, repair is not humanly possible and thus remediation is an unenforceable requirement. Also it is inappropriate for the largest biodiversity offset to be on the mine subsidence area. This will take many years, if ever, to stabilise into anything resembling a biodiverse self-sustaining ecosystem. This proposal clearly involves unacceptable cumulative loss of threatened species habitat, particularly of the critically endangered Regent Honeyeater, which has not been assessed.

The sole justification put forward for this project is the economic security claimed for decades into the future, this economic model is broken. It is now widely acknowledged that the market for export thermal coal is in structural decline. With or without any future price on pollution, thermal coal no longer competes with alternatives on price, not to mention social acceptability. Considering this, there is no believable or properly costed justification for Bylong Coal Mine.

The long term environmental, social and economic impacts including loss of farming capability into the future have not been considered. Repeatedly advocates in favour of Kepco’s proposal refer to entrenched youth unemployment, closures of businesses and services and lack of job security in Mid-West Regional Council area and that coal mining is the only thing saving Mudgee from being ‘doomed’. Regularly and repeatedly for decades in the MWRC area, numerous mining proposals have been approved and more are upcoming. All these expansions of coal mines are put forward on the basis that their approval is essential to bring economic benefits for the area. After many years of such approvals, believable witnesses still can testify to desperate economic circumstances for Mudgee, closure of businesses and services, chronic economic insecurity and lack of opportunity for young people across the MWRC area. In fact as time has passed and with each new mining expansion proposal the number of such witnesses to the area’s economic fragility has grown. This is an indicator that approval of yet another coal project, to rip up yet another river valley east of Mudgee, cannot deliver on promised economic and social benefits for the area or NSW.

I believe further approvals of mining projects can only deepen economic dependence and in the absence of any plan for an equitable close down of the coal mining industry, this will exacerbate the future economic shock that is now certain according to climate science, increasing disapproval of burning of coal, loss of social license to operate and adverse economic indicators for the thermal coal export market.

The Independent Planning Commission has a duty to consider the IPCC 1.5 degrees report that was handed down on the same day as the Bylong final assessment report. Keeping global warming below 1.5 degrees means phasing out coal in OECD countries like Australia and South Korea. There is an agreed need to phase out coal burning as soon as possible. This mine has a life span up to 2044 and is not consistent with NSW Government policy which states that, "The NSW Government endorses the Paris Agreement and will take action that is consistent with the level of effort to achieve Australia's commitments to the Paris Agreement."

The final assessment report fails to adequately consider:

- threats to the Bylong River and connected groundwater, threats to other water users and agricultural production
- threats to state significant heritage landscape values of Bylong Valley
- threats to ongoing farming enterprises including the pioneering natural sequence farming techniques at Tarwyn Park
- threats to the Wollemi National Park and Greater Blue Mountains World Heritage Area
- cumulative loss of Aboriginal cultural heritage, biodiversity and community in the region

I am a volunteer firefighter and on many occasions have given up days of my time, risking my safety, defending Bylong Valley from wildfires and travelled down there to try and help re-establish Bylong RFB [These are my views not those of the RFS]. I resent the statement made at the hearing characterising those objecting to this proposal as making no contribution to the community.

Yours Sincerely

Colin Imrie

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