

Boggabri Farming and Community Group

Mr John Hann
Chair
Independent Planning Commission Panel
Level 3, 201 Elizabeth Street Sydney
NSW 2000

Dear Mr Hann and fellow commissioners,

Thank you for the opportunity to make this submission on behalf of the Boggabri Farming and Community Group (BFCG) regarding the Vickery Extension Project in addition to the verbal submission made at the public hearing on the 5th of February. We would like to raise the following points in light of recent findings and in response to some of issues raised at the public hearings.

Relevance to the Gloucester Resources Land And Environment Court Ruling.

We regard the recent judgment by Justice Preston, Chief Judge of the Land and Environment Court, regarding the Rocky Hill Coal Project as an important precedent in consideration of the Vickery Extension Project. Paragraph 8 of the Judgement states:

“The mine will have significant adverse impacts on the visual amenity and rural and scenic character of the valley, significant adverse social impacts on the community and particular demographic groups in the area, and significant impacts on the existing, approved and likely preferred uses of land in the vicinity of the mine. The construction and operation of the mine, and the transportation and combustion of the coal from the mine, will result in the emission of greenhouse gases, which will contribute to climate change. These are direct and indirect impacts of the mine. The cost of this open cut coal mine, exploiting the coal resource at this location in a scenic valley close to town, exceed the benefits of the mine, which are primarily economic and social. Development consent should be refused.”

This determination could have equally been written about the Vickery mine. Only that the Rocky Hill mine is dwarfed by the Vickery mine. Is the Namoi Valley and Liverpool Plains not just as important to protect as the Gloucester Valley? Are the people of Boggabri and on farms around the Vickery site second class citizens? Are we any less important to the government than those at Gloucester?

In terms of greenhouse gas emissions the Rocky Hill mine is estimated to directly and indirectly contribute 37.8 million tonnes of carbon dioxide to the atmosphere. In comparison, according to Whitehaven Coal’s own estimates in the EIS, direct and indirect greenhouse gas emissions will be 389,336,174 tonnes of CO₂ over the life of the mine. More than 10 times the climate impact.

Justice Preston in his summary, said that the Gloucester mine would be “in the wrong place at the wrong time”. A sentence that summarises Whitehaven’s mine perfectly.

The Wrong Place

Bounded on three sides by the Namoi Alluvial Groundwater, the Vickery state forest to the East, the Namoi river to the South and West, and on the northern edge of the Highly fertile Liverpool plains.

The Wrong Time

Right now we are seeing fires in Tasmania threatening thousand year old forests, North Queensland hammered by record breaking floods, and here in NSW we are in the grips of the worst drought on record and have just experienced the hottest January recorded, with the average day and night temperatures almost six degrees above average. Climate change is no longer a threat of the future, we are experiencing it now. Mining and burning of fossil fuels, and in particular coal, is the single greatest threat to our climate. We believe coal mining is a sunset industry and it is not the time to be giving the green light to new developments that will contribute to irreversible damage to our planet.

Additional Considerations Following IPC Public Hearings

Members of the Boggabri Farming and Community Group have raised a number of issues and questions for the consideration of the commission in assessing this mining project. These are outlined below.

- Several speakers identified the benefits that mining has brought to the region, especially Gunnedah. These benefits are here already and are not reliant on the approval of the Vickery extension project. Whitehaven Coal already has an approved mine at the site which would provide a far more sustainable project, in terms of jobs and the environment, and over a longer period.
- A few speakers talked about the benefit of the mines on the retail businesses in Boggabri. While our group and many business owners in Boggabri would dispute that mining has had a net beneficial impact on retail in Boggabri because of the loss of farming families, the Vickery mine and its workers will support Boggabri even less. This is simply because of the geographical location. The vast majority of employees and contractors will reside in Gunnedah (as is already the case with existing mines on the other side of Boggabri), from where they will travel down the Blue Vale Road to the mine. They will not go anywhere near Boggabri.
- We respectfully ask the commission to consider all submissions individually on their merit and not to view the number of submissions as a popularity contest. Throughout the entire assessment process, the proponent conducted a costly and extensive campaign encouraging and helping workers, contractors, and suppliers prepare submissions. As individuals and small businesses, we do not have the resources available to counter such campaigns, and we do not feel that it is a fair representation of the wider communities feelings towards this project.
- We would like the commission to consider if the application should be assessed as an extension to the existing approval or should it be treated as a new mine? The output of coal has more than doubled, the mine footprint has expanded including mining of a completely new Exploration and Mining Licence (EL7407 and MLA1) and includes the addition of a coal handling and processing plant and 15km railway spur that will also service other mines.

Additionally, the proponent for the extension is different than the owner and licence holder of the approved mine, being Vickery Coal Pty Ltd for the new application and Whitehaven Coal Pty Ltd for the approved mine. Can a Proponent lodge an application for an extension to a mine that they don't own?

- Further to the point above, if it is considered that Vickery Coal Pty Ltd can lodge an extension because it is a wholly owned subsidiary of Whitehaven Coal Pty Ltd, then likewise shouldn't the Environmental record and Political donations of Whitehaven Coal Pty Ltd also be considered as required by the SEARS and DPE?
- Has consideration been made into the impact of years of blasting and possible fracturing of non-target rock strata on the productivity and sustainability of the Namoi Alluvium Groundwater source? Whilst the EIS has attempted to model the drawdown to the Namoi Alluvium due to depressurisation from mining we feel it has not considered the effects of continuous blasting.
- Has consideration been made into the loss of recharge to the Namoi River and Namoi Alluvium as a direct result of water harvested under harvestable rights over the whole mine site? These losses should be considered in determination of water licenses required for the project.
- Does the applicant really hold the water licenses required for this project as stated by the proponent? We feel that the licences held will not be adequate in dry years. Local anecdotes suggest that Whitehaven will run out of water at its existing mines this year (18/19 water year) without the additional consumption that will be required from the Vickery mine.
- The BFCG requests the commission investigate the unusually small "zone of affectation" of this proposal, especially relative to existing mines in the region. We recommend that a zone of affectation be established within a distance of 10km from the mine boundary, and that the proponent must conclude negotiations with these residences prior to any developmental consent. This is not necessarily voluntary acquisition, it may involve mitigation measures such as screening, double glazing windows, compensation for loss of land values, or establishing no blast zones.

We thank the commission for your consideration of the above points.

Yours Sincerely,

David Watt
On behalf of Boggabri Farming and Community Group.