

The following forms my submission in opposition to the Hume Coal Project EIS (SSD 7172) and the Berrima Rail Project EIS (SSD 7171).

OBJECTION TO HUME COAL PROJECT EIS. SSD 7172

- 1. WATER BORES:** will be seriously compromised. The EIS admits that the Project will seriously affect landowner's water bores in the area above the mine. The EIS says that 93 bores owned by 71 landowners will be affected with some bores drawn down by up to 80 metres with the impact lasting for decades. Independent data from CFSH investigations has shown that the impact will be far greater than that suggested in the EIS.
- 2. MINE WASTE:** The proposal plans to reinject the potentially toxic mine waste, including the chemicals used in the coal washing process, back into the mine. This potentially pollutes any groundwater in the aquifer above the mine. Any new bores drawn after mining would be compromised. The proposal is basically putting waste products into an active aquifer.
- 3. POLLUTION OF LOCAL RIVERS AND STREAMS:** The EIS states that the proposal will only need to pump water into Oldbury Creek on rare occasions. There is no Water Treatment Plant in the plans so if water volumes are greater than anticipated about the amount of water there is a serious risk of toxic mine waste water polluting the local river system which is part of the Sydney Water Catchment. Once again, independent water studies believe that the volumes of water referred to in the EIS have been grossly under estimated.
- 4. SPURIOUS ECONOMICS:** The EIS ignores serious impacts on other local industries such as tourism and agriculture and the subsequent loss of local jobs while misrepresenting the number and types jobs that will be created. The project contributes very little to the NSW Government by way of royalties and independent economic analysis strongly shows that the mine is likely operate at a loss so there will also be no income to the NSW Government by way of tax.
- 5. CLIMATE CHANGE:** It is the ethical and moral responsibility of an effective Environmental Impact Statement to fully investigate the cradle to grave use of the mined product. There is increasing opposition to the use of fossil fuels based on their overall impact on climate change. The Environmental Defenders Office (EDO) challenged the proposed Charmichael Coal Mine by asking the question - Should coal projects be held responsible for the greenhouse emissions that flow from their product, even if it's burned on another continent? The challenge tested the federal court as to whether climate change caused by greenhouse gas emissions should be taken into account when assessing prospective coal licences in Australia. The court challenge particularly relates to a section of the Environment Protection and Biodiversity Conservation (EPBC) Act, the national environmental legislation. Section

136 of the act states that assessments must take into account international principles of ecological sustainability, meaning that for projects that impact areas of national environmental significance, consideration must be given to concepts such as the needs of future generations and the precautionary principle. The NSW Environmental Defenders Office has argued that these principles necessarily require federal environment minister Greg Hunt to consider the climate change impact of emissions from the burning of coal when deciding whether to approve a mine licence.(Samantha Hepburn, [Deakin University](#))

More recently, Westpac has effectively ruled out financing Adani Group's controversial, giant coal mine in Queensland's Galilee Basin under a new climate change policy. Their policy would prohibit lending to new coal mines in Galilee Basin. Westpac has committed itself to help cutting emission in power generation and supporting a carbon price. They have been criticised by the Resources minister Matt Canavan who said that Westpac is a wimp for caving into activists. The bank's "new climate change position statement and action plan" restricts lending to projects which use "the highest quality coal in advanced power generation technologies". "Our lending to customers in the thermal coal sector is limited to those that have a calorific value which ranks in the top quartile globally," the new position statement said. That effectively would prohibit lending to ventures using coal from Australia's last untapped resource in Queensland's Galilee Basin.

Westpac is restricting finance for new mines to those using resources in the top 15 per cent of coal quality globally. "We define the top 15 per cent as having a specific energy content of at least 6,300 kCal/kg gross as received," Westpac's policy noted. "This value is referred to as the Newcastle high energy coal benchmark." (Stephen Long, 2017)

Bob Brown refers to the Adani Coal Mine as a "climate Bomb". Associated with care for the environment is the duty of care for future generations. If continued coal mining will put at risk the health and welfare of future generations in Australia or elsewhere, it cannot be ethically justified. (Andrew Hamilton, [eurekastreet.com](#) 2017)

Worldwide there is an increasing importance on the impact of new coal mines on climate Change. Whereas the Hume Coal Project EIS does asses the impact of the operational process on greenhouse gasses it fails to asses the impact of the end product on climate change. These factors make the approval of a project that has not considered the environmental impact of the end use of its product deficient.

6. **COAL DUST:** Coal dust is a health hazard and can carry a long way in the windy conditions that occur frequently in the Southern Highlands. The dust along the railway lie also easily becomes airborne bypassing trains. Increases in dust, plus diesel emissions along the rail corridor, have a significant ability to impact on the health of the residents in the Southern Highlands.
7. **HERITAGE:** The Sutton Forest and Berrima areas contain some of Australia's most valuable and pristine colonial heritage assets including the Berrima Township itself. A coal mine in the area, with its associated noise, dust, train movements and water

impacts, will have a serious impact on the amenity of the area for tourism and heritage related activities on which the economy of the Southern Highlands depends upon.

- 8. SOCIAL IMPACTS:** After over 6 years the uncertainty caused by the prospect of a coal mine in the district has caused anxiety, depression and ill health in the community. Hume Coal's aggressive approach and lack of transparency has exacerbated the situation.

OBJECTION TO BERRIMA RAIL PROJECT EIS. SSD 7171

I object to this project and believe it should be rejected. The assessment for the Berrima Rail Project does not sufficiently investigate the potential impact of rail works, and associated maintenance facilities and movements, on the environment. It is my belief that the Berrima Rail Project is incomplete and that assessments have not been made using complete data sets and are therefore assumptions.

- 1. TRAIN MOVEMENTS:** I believe that the assessment underplays impact of increased train movements. The EIS states that the operation of the Hume Coal Project will require approximately 50 train movements a week along the new rail spur, the Berrima Branch Line and onto the Main Southern Railway Line between Berrima Junction and Moss Vale Junction. Based on the assumptions in the EIS, that daily train movements are currently at 120, the inclusion of trains from the Hume Coal Project equates to a 42% increase in rail traffic. A 42% increase in rail traffic is a significant increase. Calculations in the EIS are made not on current actual data but on the proposed reduction of train movements following the proposed closing of the Tahmoor Colliery.
- 2. AIR QUALITY AND GREENHOUSE GAS EMISSIONS:** Air Quality and Greenhouse Gas Emissions from the locomotives are stated to be within acceptable limits – yet we still have a 42% increase in train movements and this increase/cumulative effect has not been accounted for.
- 3. TRAFFIC DELAYS:** on the Illawarra Highway, due to the increased train movements to Unanderra, has been calculated at 24 minutes per day and yet is not considered significant. The nearly 30% increase in the total time rail crossings are closed each day as a result of the Hume Coal proposal will present unacceptable impacts on emergency vehicles including fire brigades, ambulances, police and other critical community services.
- 4. MAINTENANCE SIDING WORKSHOP:** I personally spent over a decade undertaking environmental management and soil contamination restoration works at many of the State rail Authority's Locomotive Maintenance Facilities (including the Eveleigh Workshops, the Clyde Maintenance Yard, The Newcastle Maintenance facility and the Valley Heights Locomotive Workshop). I do not believe that the proposed maintenance siding workshop can be located anywhere without creating a significant environment impact. The information supplied does not address enough detail for a coherent

assessment to be made. I believe that there will be a significant visual impact and that the risks associated with oil and diesel contamination are too great.

- 5. IMPACT ON MOSS VALE TO UNANDERRA LINE:** The EIS is limited and only takes into account a small part of the rail line that Hume coal is going to use. If Hume Coal proposes to use 70 kilometres of rail for hauling 3.5 million tons of coal then it is only reasonable for the Public interest and the rail engineering authorities that the full 70 kilometres of rail should be evaluated within an EIS .This rail line was built in 1932 and has structural and infrastructure deficiencies which have not been addressed in the EIS.
- 6. NOISE AND DUST:** I believe that the noise and dust impacts from the increased traffic on the line have not been sufficiently dealt with as the assessment is made assuming that the Tahmoor Colliery will close prior to the commencement of the Hume Col Project.
- 7. EMISSIONS FROM LOCOMOTIVES:** Issues have been raised over the quality of the emissions from the proposed locomotives that would be used to haul the coal. Once again, calculations appear to have been made in isolation from the current and future conditions on the railway line.
- 8. CONGESTION OF THE MAIN SOUTHERN RAILWAY LINE TO SYDNEY:** The proposal only considers impacts on the proposed expansion of the Berrima Branch Line and does not cover operational impacts on the Main Southern Railway Line. It does not deal with how the increased 8 train movements per day will impact on the Main Southern Railway Line.
- 9. ROAD CROSSING SAFETY:** The increase in rail traffic highlights the current issues with the road/rail crossings in the Southern Highlands. There are a number of vehicular and pedestrian crossings of the Moss Vale to Unanderra Railway Line that do not have boom gates. The issue of vehicular and pedestrian safety is not sufficiently addressed in the proposal.
- 10. RAIL SAFETY:** The Moss vale to Unanderra Rail Line was never designed for heavy haulage traffic of coal by diesel and electric locomotives. The line was built in 1932 and was an integrated rail line for the movement of single load carriages to the East Coast from the Highlands.

In conclusion I believe that there are more things wrong with the Hume Coal Project EIS than are right with it. The Department of Planning & Environment should never have accepted a document that is, at best, a rough first draft. The document is quite open about the impacts on the aquifer, amongst other things, and yet uses the vague phrase "make good" to assure the reader that everything will be alright. In this day and age this is just not good enough!

Yours faithfully
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