

Submission by Helen Saville, [REDACTED]

I object to the Hume Coal Project – Mine and associated infrastructure – SSD 7172

I have lived in the Southern Highlands since 1993 and am well acquainted with many of the areas which would be negatively affected by this proposed coal mine. In particular, I visit Berrima at least once a week for various activities and am deeply concerned about the potential negative impact on this heritage village if a major coal mine development were to be permitted next door.

I refer to the recent decision regarding the Rocky Hill mine proposal near Gloucester and the case against it made by a group of concerned residents in the Land and Environment Court. The judge's decision highlighted the impact on climate change as posing an unacceptable risk and commented that this project was at the wrong time and in the wrong place. Both of these factors also apply to the proposed POSCO/Hume coal project.

My major objection is that the Hume Coal project EIS failed to consider the impact on climate change because it ignored the end user impacts of coal mining, as well as the potential for increasing pollution and greenhouse gases in our area. The judge in the Land and Environment Court regarded these impacts as highly relevant. They are just as relevant in this case.

In the case of the proposed POSCO/Hume Coal mine, the original claim to justify the mine was that it was to mine metallurgical or coking coal for steel production, although this would all be exported. However, the company was then forced to admit that not all the coal deposits being considered were suitable for coking coal and the remainder would be for thermal coal, which directly contributes to greenhouse gas emissions, whether in South Korea or in Australia.

The Hume Coal EIS quite specifically excludes any consideration of end user impacts on climate change through the release of the greenhouse gases that will result from the burning of thermal and coking coal, because these are likely to happen in South Korea. However, the EIS does suggest that there may also be local users, which would then increase Australia's greenhouse emissions. The Executive Summary included the completely absurd claim that the mine would be an "ecologically sustainable development". This statement shows that Hume Coal in the EIS has carefully selected information from the studies commissioned to downplay the potential for increased pollution in a clean, green environment such as the Southern Highlands. It is essential that Australia reduces, not increases, its greenhouse gas emissions, so the only sound policy is no new coal mines, especially in New South Wales where most communities, like the Southern Highlands, reject new coal mines.

The EIS ignored or misrepresented the heritage values of the surrounding areas in the Southern Highlands, especially the nationally important town of Berrima. In fact, the EIS looked only at a very limited geographical area around the proposed mine, in order to ignore the potential impacts on Berrima. There are moves within the Berrima community and the Southern Highlands to have the village of Berrima and surrounding areas to be declared a significant heritage and cultural landscape, as the village is the oldest intact Georgian village in Australia, set within a landscape that reflects and enhances this value. Allowing a substantial coal mine and associated infrastructure on the doorstep of this village is utterly inappropriate and against the wishes of most residents of the Southern Highlands.

This project is not in the public interest and should be rejected. It also involves major disruption to groundwater in the Southern Highlands and has already had a negative impact in our community.

The project is very likely to have significant impacts on a highly productive groundwater aquifer including drawdown impacts on up to 118 privately owned bores. These impacts could last for up to 65 years. Both the NSW Department and Dol Water (Department of Industry – Water) have stated that the predicted drawdown impacts on this aquifer would be the most significant for any mining project that has ever been assessed in NSW. While the proposed ‘make good’ measures (e.g. deepening pumps or replacing bores) may be technically feasible, the NSW Aquifer Interference Policy considers the possible scenario where there are “no suitable or practical mitigation or prevention options”, and the Department quite rightly considers that this project represents such a case. The proposed ‘make good’ process, a standard statement from all mining companies, would inevitably result in a large number of negotiations and disputes with local landowners, unavoidable delays to the development of the project, and significant disruption to the community. In fact, the only make good option that might be available would be the extension of town water to all affected landowners in a substantial area around Berrima and Sutton Forest, most probably at great cost to the NSW government and all taxpayers. This is one of the most unacceptable risks associated with this project.

The Southern Highlands remains in significant drought, even though some areas look green because of some limited summer rain and summer growth. The soil moisture is the lowest it has ever been in the 25 years I have lived here and even on longer term measures. Much of the Southern Highlands is part of the Warragamba Catchment, which depends on good river flows from this region and the aquifers are also an emergency resource in times of prolonged drought. Therefore, any project which adversely affects the water resources of this region must be rejected.

For all the disruption that this coal mine would cause, there will be a very poor economic return to the state and this community. The Department of Planning has pointed out that even POSCO/Hume Coal’s estimated net economic benefits of \$373 million are relatively low in comparison to many other coal mining projects in the Southern Coalfield and across NSW. The number of jobs that the EIS claimed will be created is likely to be exaggerated as most mining is now moving to robotics and remote technology. It will not create jobs for young people in this area as the company will be recruiting experienced people for the available jobs. In any case, the vast majority of young people in this area reject this mine. Such jobs as may be created may be filled by more experienced employees of the mines around Tahmoor, which have been in a somewhat precarious economic situation for several years, resulting in changes of ownership and possible job losses in that area. As tourism, through various associated activities, is a major employer in this region, the result of this mine being approved could well be a loss of jobs, rather than an overall gain in jobs.

The behaviour of Hume Coal/POSCO over the past five years or more has been aggressive, intimidatory and disrespectful of the views of this community. This is similar to the behaviour of the company behind the Rocky Hill mine proposal near Gloucester, where the company sought to divide the community and buy off some groups in order to attain their objectives. This pattern can be seen all across NSW where large scale mining proposals put forward by large well-resourced international companies seek to undermine community cohesion and wear down the energy and resources of volunteer community groups who oppose them.

The same pattern of disruption and undermining community groups, often with the support of the NSW government, acting at the behest of lobbyists, can be seen in the Hunter region, the Liverpool Plains and around Gunnedah. The role of a state government should be to support the legitimate objections of large number of people in these communities. Instead we constantly see well informed volunteers branded as troublemakers instead of being listened to, because of the appeal of mining royalties for the government coffers. For this, whole communities are undermined and destroyed and the environments they live in and love are wrecked. It is time for a far more consultative process before a mining lease is even granted, so that the lives of people in rural and regional areas are not disrupted for years on end in the fight against inappropriate mining proposals.

The IPC should be aware that many sporting and community groups have rejected cash handouts from POSCO/Hume Coal so that they will not be compromised. These so-called grants are a major way that this company has sought to divide this community. It is not assistance so much as gross interference.

The Southern Highlands community has been constantly told that we are “ill-informed” if we object to the proposed mine, yet this is a highly educated community which can draw on a very considerable range of expertise amongst the retired scientists, educators, lawyers and business people who live here, as well as those in the wide range of environmental and community groups who have spoken out against the mine. The EIS, which it was claimed would answer all of our questions, turned out to be little more than a marketing document which sought to sidestep the serious concerns about damage to surface and groundwater, damage to good farmland, potential for dust pollution because of prevailing winds towards Berrima and Moss Vale and problems for neighbouring residents from blasting and other noise pollution.

Hume Coal/POSCO has been highly deceptive in promoting this mine as it claimed until the EIS was released that the proposed mine was for coking coal for export to South Korea. We now know that only 55% of the coal mined will be coking coal and 45% will be for thermal coal. However, there has been a change of government in South Korea and the current government has a policy of closing down old coal fired power stations and halting the development of new coal fired power stations in favour of developing more renewable energy sources. They are also likely to impose a tax on coal imports. South Korea is committed to moving to renewable energy sources. These changes mean that this mine is simply not wanted or needed as there may be little or no market for the thermal coal mined and the coking coal for POSCO-Daewoo's steelmaking could be obtained from existing mines. An unprofitable mine that could close or just go into “care and maintenance” is certainly not in the public interest. Hume Coal/POSCO should have been questioned in depth about its response to these changes in the country where this company is based.

Despite claims to have all of the technical solutions to mining coal from below a highly significant aquifer, Hume Coal/POSCO has not convinced the community in the Southern Highlands that groundwater resources for local agriculture should be placed at risk in order to export coal for the profit of a foreign owned company. In fact, the technology that Hume Coal/POSCO says it will use is largely untried and untested and could create major damage in the complex geology above and below the coal seam. The EIS acknowledged that 93 bores on 71 properties are likely to be affected by water drawdown. These bores provide essential water supplies for the many agricultural and grazing activities carried on in the Southern Highlands and are far too valuable to be put at risk.

The EIS acknowledges that the impact on the bores could last for up to 65 years or more, that is, long after the proposed mine ceases operation. The only response of Hume Coal/POSCO is that they will “make good” the damage to essential water supplies. However, “make good” agreements in other mining areas make the user of the bore liable for proving their case against the mining company causing the damage. This is an utterly unacceptable way for a state government to treat its citizens in order to receive the rather paltry royalty revenues from this mine. Protecting ground and surface water and quality farmland from environmental destruction is a far higher priority for the future than allowing a coal mine to risk these resources for 20 years. On this basis alone the proposed coal mine should be rejected.

Furthermore, it appears that Hume Coal/POSCO does not have sufficient water licences from the properties it has acquired to supply its water needs and is likely to ask for additional water from the state government. There is no case for supplying precious water to this company in a situation where we face increasingly erratic weather and potentially reduced rainfall, while the population of Sydney and the state continues to grow. No new mines should be approved in the Sydney Water catchment and those already in existence should be phased out.

Potential for increased dust pollution: Hume Coal/POSCO has made many claims that they will effectively control wind borne pollution from coal dust, but these claims are not plausible. It now appears that there will be three very large above ground stockpiles for thermal coal, coking coal and toxic mine rejects. The company has included wind modelling of up to 100 km per hour, but this is inadequate because of the particular location of the mine and the likelihood of increasingly erratic climatic conditions in the future. Strong southerly and south westerly winds are a feature of the Southern Highlands climate in the winter and spring months and even in the summer months. Gales and small scale hurricanes have been experienced in different areas, with gusts exceeding 100 km per hour. The studies do not take account of this variability and the potential for coal dust to be blown towards Moss Vale and Berrima in the path of strong winds is of very great concern. There is also the potential for coal dust to be blown into surrounding creeks, creating major pollution, and into water tanks which are the only water supplies on some neighbouring farms.

Dust pollution will also result from the long coal trains moving through the Southern Highlands and down to Port Kembla. Covering coal train wagons will not completely eliminate coal dust and this dust will be mixed with diesel particulates from the increased number of trains. Dust pollution in residential and rural residential areas is a threat to human health and also increases the risk of bushfires along the railway lines because of the build-up of dust over time.

Behaviour of Hume Coal/POSCO in this community: For the past six years, Hume Coal/POSCO has sought to undermine the well-founded concerns of those opposed to the mines, both the landowners affected and others in the community. They have also ignored the opposition of the Wingecarribee Shire Council to the mine, the more than 16,000 people who have signed petitions against the mine and who continue to actively oppose it. Local surveys indicate that a very small number of local residents support the mine, while the vast majority want their communities to be coal-free. As a member of the review panel of the WSC Community Strategic Plan this year, I can affirm that almost no-one in this widely representative group supported the mine and none of the younger participants did.

Hume Coal has intimidated local landowners and community groups through suing them over refusals to allow access to their land, but landowners' rights have been upheld. However,

landowners have been forced to pay substantial legal bills, which have partly been covered by community fundraising. The fact that people will contribute to these legal bills says much about the commitment of local residents to protecting their cultural and heritage environment.

There is a continuing amount of stress in this community caused by the threat of this coal mine being approved, both among larger landowners in the Sutton Forest and Exeter areas, residents of Berrima and those around Berrima and Medway who are preserving significant bushland, including koala habitat, on their properties in perpetuity through conservation agreements. Landowners who have been forced to defend their properties against access for unwanted exploration are suffering major health issues. Hume Coal/POSCO has shown no concern or recognition of the significant developments on these properties, including preservation and restoration of bushland or the development of international standard major equestrian facilities.

In addition, property values have decreased and older residents who may wish to move on are unable to sell, because they will lose a substantial amount of their property's real value or because they do not wish their properties to be bought up by Hume Coal/POSCO. In at least one case, Hume Coal/POSCO acquired one of the properties that it now owns through the subterfuge of a holding company with a different name, despite the vendor specifically wanting to avoid selling to this mining company.

Southern Highlands residents need the state government to recognise their real concerns and protect against intimidatory and dishonest behaviour by Hume Coal/POSCO. However, those who have researched the record of the now amalgamated conglomerate of POSCO-Daewoo are disturbed but not actually surprised by this intimidatory behaviour, as this company has engaged in major human rights and environmental abuses in India and Myanmar, even leading to physical attacks and deaths amongst those who have protested against loss of land, loss of livelihood and environmental damage. As Hume Coal is a wholly owned subsidiary of POSCO-Daewoo, one can only assume that these tactics are supported by the parent company. As Hume Coal is a privately owned company, there is also very little transparency about its activities in Australia and little opportunity for local residents to challenge them. There are no shareholders' meetings for concerned residents to attend. Therefore, it is of the utmost importance that the interests of local citizens are protected by the state against a predatory private company.

Studies commissioned by Hume Coal/POSCO were highly selective and failed to properly assess impacts on heritage and associated cultural landscapes, on biodiversity, on Aboriginal sites and heritage and also fail to make an adequate business case. The Heritage study in the EIS avoided mentioning Berrima, the most significant Georgian town in Australia, and avoided listing many of the buildings and landscapes of state and local significance in the area which will be impacted by the mine and rail movements, by only considering a very small area around the proposed mine site. This is totally unacceptable as the area of impact is much wider and the company needs to be called to account for this.

Likewise, the Biodiversity Impact is extremely brief, even though it involves the removal of 64 paddock trees and dead trees, which provide important habitat. The Southern Highlands has a significant koala population and koalas move seasonally through the whole region, from Yerrinbool and Alpine to Canyonleigh and beyond, so the area which would be impacted includes corridors of koala movement. There is considerable community commitment to the protection of koala habitat.

In addition, the study of Aboriginal sites was very poor and lacked adequate detail to make an assessment of impacts, possibly so that construction and mining will not be held up by the need to call in Aboriginal consultants and archaeologists. Demeaning the significance of Aboriginal sites is unfortunately a common practice of mining companies in Australia and Hume Coal is no exception. This should not be accepted.

The business case made in the EIS, especially in Appendix D, was highly misleading, as it grossly misrepresents the nature and economy of the Southern Highlands and overstates the likely returns to the state and the local community. The royalties may well be much less than the approximately \$114 million claimed, as the price of coal continues to fall. There is nothing stable about the price of coal and claims of value from this mine are highly speculative. In addition, the business study paints a picture of increased jobs but does not consider the negative impacts on jobs in all of the areas associated with tourism in the Southern Highlands, including accommodation, food services, vineyards, equestrian facilities, local tour operators, retailers and the growing production of high quality agricultural produce and fine foods, for which the Highlands is becoming renowned. Coal mining has the potential to threaten this growing clean green image which is of considerable value to local residents and visitors from Sydney and other regions. Coal mining does not fit with the growth in these areas and therefore the mine should be rejected, as agricultural and tourism and the many associated activities make a much greater contribution to the economy of this region.

Coal mining history in the Southern Highlands: Finally, the EIS claimed that we all live in the Greater Southern Coalfields Region, frankly, a term most residents have never heard applied to the Southern Highlands. The real history of coal mining in this region is of very small mines, often operated as family businesses to service local energy needs. Shale mining at Joadja was a response to wartime shortages and has ceased to exist for a very long time. The Berrima Colliery at Medway was a much smaller operation than that envisaged by Hume Coal and has been closed since 2013, to the relief of most residents in and around Medway, as it caused significant environmental pollution to local waterways and there seems to be little prospect that this pollution or previously clean creeks and rivulets can be contained. Since then, the Southern Highlands has been Coal Free and most residents want it to remain that way. There is no social licence for this mine. It should not be permitted to proceed.

Like most of the Southern Highlands community I remain resolutely opposed to this mine.