

## **SUBMISSION TO THE INDEPENDENT PLANNING COMMISSION**

SSD 7172 - Hume Coal Mine  
SSD 7171 - Berrima Rail Extension

Commissioners,

I wish to express my objection, to Hume Coal's application (SSD 7172) to build a new coal mine in the Southern Highlands and the associated Berrima Rail Extension (SSD 7171).

Based upon the DPIE's second assessment of the proponent's project plan, my concerns about groundwater impacts and Hume Coal's intentions for management of mine water have only heightened.

If the Project is approved, residents of the Southern Highlands anticipate being subjected to:

- Dangerous of coal dust particulates in the air and drinking water (from roof supplied rainwater tanks),
- Increased traffic and rail movements
- Groundwater draw down - potentially directly affecting 118 bores
- Degradation of peace and quiet as a result of Hume Coal's 24 hour, 7 day a week operational noise and light.

### **REMOVAL OF WATER TREATMENT PLANT**

The removal of a water treatment plant from the project plan seems an extraordinary and unacceptable risk to Sydney's drinking water catchment.

Were Hume Coal to find itself in the position of not being able to pump its proposed waste water rejects slurry into the mining voids for any length of time, the DPIE has indicated there would be a risk of toxic mining water making its way into Sydney's water system. This is a predictable scenario.

With the kind of deluges experienced locally, it is not hard to see how a weather event could combine with an operational shortfall to precipitate an unavoidable catastrophe.

Considering that operating coal mines in the Blue Mountains already add substantially to toxic inflows to Sydney's water catchment, and that the IPC refused the Dendrobium Mine expansion over concerns about cumulative damage to water supplies, approval of the Hume Coal Project could only further undermine Sydney's water security.

In recent times, climate change and drought have threatened Sydney's water supplies, yet coal mines have been allowed to eat away to Sydney's water catchments for decades. Indeed, the toxic hazard represented by the now-closed Berrima Colliery shows how complex the local geotechnical structure is, and how difficult and expensive it is to mitigate the long-term environmental consequences.

### **'MAKE GOOD' ARRANGEMENTS**

Having observed Hume Coal's utter failure to engage successfully with the community for well over 10 years, it's doubtful its 'make good' strategy will work.

With the litigation that succeeded in keeping Hume Coal off private land in Sutton Forrest (for its purposes of exploratory drilling), there is little chance of Hume's 'make good' strategy will resolve the problems its mine will cause landowners.

Even if Hume's strategy was practical or achievable, which the DPIE asserts it is not, Hume Coal would find itself in the position of having to negotiate with angry, litigious land owners – protracting the construction and implementation phase and, no doubt, further eroding the already weak economic prospects of the project.

Hume Coal's position that the NSW Government should approve the project and let Hume Coal work out 'make good' arrangements later (adaptive management) horrifies the community, which has no faith in Hume Coal's intentions to do anything other than force unacceptable outcomes.

#### RISK OF SUBSIDENCE – MINE DESIGN

It is an established fact that a significant challenge with the exploration lease is the presence of volcanic intrusions throughout the proposed mining area (and the consequent safety risks for mine workers).

When Hume Coal was prevented from accessing land for exploratory drilling in 2016, the then Project Director, Mr Greig Duncan said the court decision would have "severe ramifications for mining and exploration in NSW".

When questioned at Hume Coal's Southern Highlands public consultations about how being prevented from drilling would affect the viability of the proposed mine, Mr Duncan said Hume Coal's planning would be adversely affected if exploratory drilling were prevented.

Subsequently, Mr Duncan said "It is now up to the NSW State Government to review the land access laws and regulations, so that the exploration industry can continue to progress opportunities, employment and the economy for the people of NSW."<sup>1</sup>

This statement did not adequately address community concerns. It did however enhance the perception that POSCO wished to advance its proposal, regardless of worker safety or environmental impacts, by pressuring the NSW Government to change its laws to suit POSCO.

Such disregard for due planning process, which the community has come to recognise of Hume Coal/POSCO's conduct, served only to enhance levels of distrust throughout the community.

In response to Mr Duncan's statement, the NSW Government did not review its laws to the benefit of Hume Coal, so how can the public have confidence that Hume Coal has safely completed its planning, without the information Mr Duncan considered critical back in 2016?

Numerous concerns remain about the safety of the 'Pine Feather' mine design. I understand there are only two other examples globally, neither of which are operational and one of which was closed due to safety concerns.

The DPIE has expressed its concerns about the risk of subsidence and its associated impacts on groundwater, surface water, and other critical nearby infrastructure.

POSCO/Hume Coal, which has neither built nor operated a coal mine in its history, expects the community to trust its cavalier approach, accepting Hume Coal's confidence in the design.

We have a proponent with 'L-plates' demanding we ignore the risks outlined by multiple independent mining experts and various government departments.

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<sup>1</sup> <https://www.abc.net.au/news/2016-05-10/southern-highlands-families-win-appeal-against-hume-coal/7402054>

## AIR QUALITY, TRAIN MOVEMENTS

Westerly wind gusts in the southern highlands regularly top 65 km/h and this will readily distribute coal particulate dust downwind of Hume Coal's six story high, 800-metre-long coal stockpile, and nearby reject pile, to New Berrima, Berrima, Moss Vale, Burrawang and Bowral.

In southerlies, these prevailing winds will directly affect the small nearby village of Medway; in westerlies, Moss Vale, Berrima, Sutton Forrest and Bowral more generally.

I do not have confidence that Hume Coal's wind modeling data has been genuinely and fairly gathered, with only two testing locations specified in the EIS.

Critically, there are multiple schools and aged care facilities immediately downwind of the proposed stockpile. The medical evidence from the NSW Hunter Valley clearly shows the health of the young and elderly has been adversely affected by coal particulates.

Despite Hume Coal's plan to cover coal wagons and 'veneer' the stockpile, a substantial increase in coal dust will occur across communities, exacerbated by train movements.

Medway, Berrima, New Berrima, Moss Vale, Burrawang, Robertson and the Illawarra communities will be affected. Disruption to emergency services also constitutes a major concern, with multiple Illawarra Highway level crossings subjected to increased train movements and delays.

Coal wagons become covered in coal dust during the loading process, so simply covering their open tops doesn't greatly diminish the spread of dust along rail lines.

Additionally, the diesel locomotives to be used to pull the coal wagons burn poor quality fuel, with the consequence being increased emission outputs.

## WATER

The impact on water bores across the Southern Highlands will be too high, and the risk of permanent damage to the aquifer too great.

The 'Pine Feather' mining technique Hume Coal proposes is experimental - in the sense that it has never been implemented in Australia before. There is a substantial degree of residual uncertainty about the mine design and, in particular, the methodology underpinning the geotechnical model.

Generations of farmers in this region have relied upon good clean water to run businesses and create jobs. The Hume Coal proposal puts their water supply at risk and there is little community confidence in its promises of compensation and/or replacement water supply. Nor are its 'make good' plans considered realistic.

The stress and anguish for landowners, particularly in Sutton Forest, Medway and Berrima, is inestimable. Residents feel disadvantaged by the prospect of being required to negotiate with Hume Coal, with no NSW Government guidelines in place, and Hume Coal the final arbiter.

Further, the risk of coal dust and storm water run-off from the stockpiles, in extreme weather events, is unacceptable.

The plan to pump toxic rejects back into the mining voids beneath the aquifer creates the final long-term risk to water quality. Again, this hasn't been done before and, if it fails, bore water safety is put at risk, far into the future.

Even after Hume Coal stops mining in twenty years, assuming that's the case and it doesn't expand, farmers may have to wait up to 60 years for water levels to be restored.

What security is in place for security of water supply for affected landowners for this length of time, long after Hume Coal has gone?

## **JOBs**

There are approximately 7,500 jobs in tourism, retail and agriculture in the Highlands. Hume Coal's promised 300 permanent jobs threaten to impact on those sustainable, current jobs. New, sustainable agriculture, viticulture, paddock-to-plate, antique, general retail and tourism industries are currently adding to the traditional mix of farming, coherently.

Coal mining is not a compatible future partner in this equation, especially as Asian export markets are beginning to be leveraged by local food producers - based entirely on the pristine environment the Southern Highlands currently enjoys.

## **NOISE/LIGHT/TRAIN MOVEMENTS**

New Berrima and Berrima already know well the large amount of background noise and light generated by Boral's New Berrima Cement Works - both by train movements and general operations. Hume Coal's proposal adds significantly to this, and will certainly diminish quality of life for all local residents and fauna.

24 hours train movements, coal washing, loading of wagons and shunting will affect Medway residents, New Berrima residents and, of course the residents of Berrima.

The 8 trains per day, crossing the highlands, will create delays at multiple level crossings (despite improvements proposed at Berrima), potentially delay commuter train movements on the main trunk line as well, and delay residents, health and fire services, while slowing general commerce across the highlands.

All residents near rail lines will be exposed to increases in noise, coal dust and a loss of amenity.

## **HERITAGE**

Berrima is Australia's last intact Georgian village. Its qualities do not come from just the main historic buildings and cottages in the most public areas, but also the ranging scenic rural curtilages extending for many kilometres around the village. This incorporates Medway and New Berrima.

Regardless of promises of post-mining restoration, Hume Coal has planted many hundreds of metres of 10m thick hedgerows, intended to screen the coal stockpile and operations area from public view. These hedgerows will completely erase the historically important landscapes and open rural vistas, and could remain in place well beyond the life of the mine, despite a requirement to remove them.

Hume Coal has demonstrated disrespect for the Berrima section of Remembrance Driveway (Old Hume Highway) that it owns and is responsible. The gardens it owns are intended to honour the men and women who served in WWII and the Korean campaign. Fences have not been maintained, allowing Hume Coal's stock to damage the poorly maintained gardens. While the memorial has been let go, new fencing has been erected to enclose stock more generally, but this highlights Hume Coal's failure to understand social license in any form other than writing cheques to sports clubs.

## **SOCIAL LICENSE**

The immediate community of Berrima is opposed by in excess of 92% to the Hume Coal proposal. Medway, Burrawang and Exeter have each been surveyed with majority opposition being reflected in each case. There is anecdotally almost unanimous opposition amongst Sutton Forrest residents as well.

The threat of coal stockpiling, processing and loading, adjacent to Berrima and Medway villages, as well as mining operations under Sutton Forest, has depressed confidence in business, curtailed investment, and many business owners are convinced that the prospect of Hume Coal winning Government approval is a threat to the future viability of their business.

## **RAILWAY**

As a result, I also object to Hume Coal's application SSD 7171 to extend the rail line from the cement works to Hume Coal's proposed operations area west of the Hume Highway at Mereworth.

There is no doubt that the addition of 8 coal train movements to the rail line between Berrima and Wollongong will cause road traffic delays, disruption to the delivery of health services, and potentially life threatening delays to emergency services - both ambulance and fire services.

Railway level crossings at the Old Hume Highway (Berrima) and various crossings between Moss Vale and Robertson are adversely affected. Most notably, the crossings at Sheepwash Road and the Illawarra Highway (Robertston) stand to cause significant delays to transportation and emergency services. POSCO's plan does nothing to alleviate the impost on the community's traffic choke points.

Beyond that, despite Hume Coal's promise to cover its coal wagons, evidence from the Hunter Valley and Newcastle makes it clear that the majority of coal dust particulates originate not from uncovered coal wagons but the coal dust that covers the entire wagon and undersides (via the hoppers underneath) during the loading and unloading process.

This enables dust to be liberally distributed along the rail lines, which is then stirred up and further distributed by each passing train. This will therefore create coal dust exposure throughout the Highlands that does not currently exist.

With operational plans proposed for 20 or more years, the accumulation of coal dust along the entire route between Berrima and Wollongong imposes an unreasonable health threat to children, senior citizens and everybody in between.

NSW government income from this mine will total less than \$120 million over the next 20 years. That's less than \$2,000 per train, which is hardly a level of economic compensation that could be considered to outweigh the risk to Sydney's water catchment, the local community's health, and local sustainable economic activities.

Commissioners, I ask that you please acknowledge the concerns of the DPIE, local residents, and the failure of the Hume Coal Project's mine design to adequately address the outstanding elements of risk.

The precautionary principle must surely be applicable in these circumstances, therefore requiring that both planning applications be declined.

Yours sincerely,  
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