

Independent Planning Commission

Level 3, 201 Elizabeth St

Sydney 2000

SSD 7172 and SSD 7171 – Second referral

Dear Commissioners,

I wish to express my opposition to Hume Coal's applications (SSD 7172 and SSD 7171). The proposed mine represents a real threat to residents of the Southern Highlands as well as those of Sydney. The project fails on a number of fronts and this has not changed.

- Hume's position on groundwater modelling has not changed. The estimated 118 bores that have been calculated by Hume to be impacted over life of the mine are sufficient for the refusal of the project.
- The proposed 'make good' arrangements for depleted bores were declared unacceptable and unworkable in the DPIE Preliminary assessment. Hume has tried to make the argument that other mining projects had similar groundwater impacts, but this claim is not based in fact. Tahmoor cannot be seen as a parallel to Hume due to differences in geology, depth of mine (350 m at Tahmoor vs 120 m average at Hume) and the fact that the forecast impacts at Tahmoor are small and the long history of mining in the Tahmoor area provides some confidence in the forecasts. Hume's plans involve the financial compensation to landowners in the event that 'make good' becomes unworkable, amounting to the confiscation of landowner water entitlements. This is totally unacceptable.
- Water NSW are not convinced that all of the water produced in the mine can be stored underground in a timely manner. In this event the mine water dam may overflow into catchment waterways; the water being untreated due to the project cancelling an earlier plan to have water treatment on-site. Water NSW consider the lack of a contingency plan for water treatment facilities to be an unacceptable risk, given the cost of the plant at around \$100 m and the length of time it would take to install such facilities.
- Mine design issues: Hume has stated they have no interest in changing their mine plan. The DPIE advisors on mine design and subsidence have taken a strong position on the risks associated with the current mine plan. The risk of failure of the web pillars is significant and could have serious implications for the safety of mine workers and related environmental and economic impacts. The DPIE advisors particularly point to impact on groundwater assumptions in this event.
- The Resources Regulator has reinforced its concerns on the viability of the mine plan, particularly the impact of the mine on critical infrastructure, the Hume Motorway, the Sydney Moomba gas pipeline and major communication cables. The agency considers that the current plans to avoid catastrophic damage to this infrastructure by mining are


inadequate due to uncertainty surrounding Hume's subsidence predictions and the shallow depth of the mine.

- ~~Economics of the project: The DRIE and Hume have agreed on a figure for the expected financial benefits from the project, higher than in the original assessment from the department, but lower than might have been expected from a similar project. They note however, that the benefits of the project may be overstated if uncertainties are taken into account, and in any event are offset by the negative impacts of the project on the community.~~
- ~~The lack of social license for this project is absolutely clear. Two successful petitions (15,000 signatures 2017 and 13,000 signatures 2018) to the NSW Parliament that forced debate on the moratorium of coal mining in the Southern Highlands and an Upper House enquiry. Over 12,000 opposing submissions to the Planning Dept in response to The Hume EIS, with approximately 5,000 from the Local Government Area. There were 4,000 submissions to the first IPC hearing, with an overwhelming percentage opposing the project - 97%. Independent research conducted by Galaxy Poll in the WSC LGA showed a majority were against the proposals. Community opposition to this project will not go away and the community remains very strongly opposed.~~

Finally, Hume's standard response to the management of the identified uncertainties is to say that the project should be approved and operations 'adapted' to manage any issues as they occur, which is inconsistent with the precautionary principle.

~~Whilst there are many additional reasons why this project is not in the public interest and should not be approved, the above points, I believe provide enough concern to the IPC to rule this project out entirely.~~

Signed,

GREGORY BARNARD PULTON


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