Submission concerning the proposed POSCO coal mine

Unacceptable choices made by the EIS

Hume Coal makes it clear how it has chosen to treat mine waste and how it has chosen to treat the polluted water the mine produces. The EIS resolves these important issues by choosing to do nothing to clean the waste water at all.

To my mind the EIS places undue weight on financial benefit to the mine and not enough weight on the costs to the environment. First, the mine proposes to store all of its mine waste underground. Second, the mine proposes to do this by using already polluted water as the transport medium by which the mine waste will be returned underground in the form of a slurry (the EIS uses the term “Paste” but the use of this descriptive term is disingenuous as a paste cannot be pumped any distance whereas a loose watery slurry can be pumped many hundreds of meters.)

It was open to the mine to establish a water treatment plant and return clean water to the environment but they have chosen not to do so. It was also open to the mine to remove mine waste from the mine site and to find more environmentally acceptable ways of disposing of their mine waste but, here again, they have chosen not to do so.

The treatment of mine waste

Mine waste can be removed easily from the mine site. Good rail and road communications exist and the waste can be stockpiled in various locations not only back underground. If stored underground the waste can also be returned as dry and not as wet fill. Mine waste is already used as clean fill. The Dendrobium mine which is similar in size and output to the Hume Coal mine, and is closer to Port Kembla and on the same rail network as Hume Coal, already reduces their mine waste by recycling a million tons annually of mine wash reject as engineered fill. (Vis. Annual Report Illawarra Coal Dec 2016). This choice costs the mine money but it is better for the environment. The Hume Coal EIS has chosen not to accept this type of cost and has decided not to treat its waste polluted water. The EIS is deficient to a fault in not disclosing and discussing in full why they chose the do nothing option.

The treatment of polluted water

Hume Coal has chosen the financially cheaper but environmentally costly approach of not treating their waste water at all. Their waste water, according to their EIS will be many thousands of millions of litres every year and this water, once polluted, will always remain polluted. This “pollute and hide and ignore” approach by Hume Coal shows an unacceptable and cavalier attitude to the water I and other stakeholders need. My bore is so pure it is drinkable. Hume Coal’s proposed actions of first draining the mine, lowering the water table and then pumping polluted water back underground will pollute the aquifer and is totally unacceptable.

There are many other options to treating, handling and storing mine waste. Where conveyor belts and trucks are used to bring the good coal mixed with waste rock to the surface, these self- same conveyor belts and trucks can also be used to return the waste rock back underground without the use of coal wash water. Returning coal waste underground using water creates an environmental time bomb which can never be remedied once the aquifer is polluted.

The EIS is seriously deficient in choosing only a quick, dirty and low cost waste disposal option without any proper consideration of other options. There is no good reason for the omission of a discussion of these other options in the EIS and the only conclusion to draw is that the EIS seems to wish to avoid the costs of establishing a water treatment plant and would rather return the polluted water back down the mine untreated. It also seems that pumping coal waste and dirty water back down the mine was a course of action decided upon quite early in the planning process. Once this method of operation had been chosen the job of the EIS was to simply try and justify this solution.

Simple economics

It is concerning to also note that the prospective value of the Wingecarribee Shire rate base has already been impacted by the reduction in value of properties across the Southern Highland due to the Valuer General reassessing land values downwards. Regardless of the capital and other costs to the private landholder, which are already acknowledged by the valuer general to be considerable, the losses to the Council in rateable value, and to the State in stamp duty forgone should be factored into the economic case. A study of this has not been conducted.

There has been much talk by Hume Coal of 300 full time jobs for 20 year but there is no talk of the jobs the mine will cost in tourism and lack of amenity. Without being balanced by the number of new jobs that will not occur because the mine will depress tourism these future jobs are a spurious and selective benefit. The Southern Highlands is already famous for its tourism, agriculture, wines, lifestyle and equestrian facilities. These create jobs that exist today and more will follow if the area expands but expansion will be crippled by the coal mine. For the EIS to talk only of prospective new jobs and not to talk at all of jobs already lost and jobs forgone because of the mine is neither a fair nor reasonable approach.

The EIS does not develop, analyse or even consider any of the above arguments and yet economic benefit to Australia is the only basis on which this DA could proceed. There is a selective, highly subjective and inadequate economic analysis in the EIS. Also, no one thus far has placed a value on the water taken by the mine and subsequently returned polluted and untreated to the water table. I would also like to see a realistic value placed on the value of polluting water.

I conclude that this mine imposes unwanted and very severe long term costs on the community for no benefit to the community. This proposed mine has no social license. None of the hundreds of landholders in the proposed mining lease gain any benefit and yet all must bear the costs in loss of water and in diminished land value. In terms of net economic benefit to Australia the costs are so high in financial, human and environmental terms that this mine should never be allowed to proceed.

Thank you for the opportunity to make this submission.

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