

**PRESENTATION TO THE PLANNING ASSESSMENT
COMMISSION –
BYLONG COAL PROJECT – SSD6367**

Dr Hedda Haugen Askland (CandMag, MSocSc, PhD)

Senior Lecturer, Social Anthropology

Research Lead, Centre for Social Research and Regional Futures

The University of Newcastle

Review process

- Social Impact Assessment developed by Hansen Bailey for the Proponent
- Peer Review commissioned by the NSW DPE and developed by Elton Consulting
- KEPCO's response to the Peer Review.
- Response to Submissions
- SIA No WAF Accommodation Scenario
- Workforce Accommodation Study,
- Supplementary Responses to Submission
- DPE Preliminary Assessment Report.

Issues with baseline, representation and relocation

- A number of negative social impacts have already manifested within the local community. This obscures the baseline, yet it is an issue that remains veiled throughout the assessment documents.
- Gag clauses placed on landholders who have sold means there is a bias in the voices that you will hear. People whose lives have become significantly impacted negatively by the mine are therefore not heard.
- A 'voluntary agreement' is not voluntary and it is important to acknowledge that many of the landholders that have sold their properties to the mine have done so due to the pressures that they have experienced because of the mine's presence: people have become 'refugees in their own home'.

Social impact assessment: humans becoming objects

- All project related assessment and decision making will be connected to a moral economy, where the environmental-economic bind is negotiated. It is a matter of assessing costs and benefits within this nexus.
- In the assessment processes, noise, dust, water, traffic and 'the social' gets treated as objects for inquiry. What easily happens in this process – and what has happened in relation to the SIA for the Bylong Coal Project – is that individuals become treated as objects.
- The human element disappears from the assessment and it becomes a calculation of costs and benefits in which the essence of a social impact assessment gets ignored. This essence is **human wellbeing**.

Social impact assessment: secondary matter of concern

- Despite the centrality of the social to any project, it remains a secondary matter of concern. This is obvious in the history of decision making processes, where the social is casted off without adequate assessment and consideration (e.g. Mt Thorley Walkworth; Wilpinjong).
- In relation to the Bylong Coal Project this is also the case. Whilst significant efforts have been put in place by the Proponent and the DPE in relation to assessing social impacts, the social appears to remain at a discursive level where the different sides of the project engage in a 'war of words'.
- A good example of this is the RTS for the Bylong Coal Project, where the Proponent responds to the criticism and concerns articulated in submissions by referring back to the SIA; which is the document that the submissions are criticising for lacking in respect to assessment.

The inadequacies of the assessment include:

- no rating or assessment of impacts according to a defined assessment matrix;
- refutation and consistent undermining of perceived impacts through lack of social research and analysis. The analysis remains descriptive and, as such, does not provide adequate detail for a decision to be made. It does not look at 'what does this mean' in terms of human wellbeing;
- consistent emphasis on regional benefits without adequate reflection of local impacts. The local impacts described are significant but no assessment about these in terms of how their significance and likelihood translates to other positive and negative impacts are forwarded.
- limited feedback from stakeholder engagement.

Limitations in analysis:

- The analysis in the social impact assessment is largely descriptive and only identifies impacts as 'positive and/or negative'. It is left to the reader to identify the severity, extent and temporality of the impacts.
- Shallow analysis when it comes to negative and cumulative impacts
- Whilst the word 'cumulative' is included on a number of occasions and the Proponent claims to assess cumulative impacts, this is not the case. As with direct social impacts, there is no real assessment of the impacts that are projected.
- No recognition of cumulative social impacts as they manifest through the interconnections of the three existing mine and the current proposal. The link between the small rural villages (Wollar, Ulan, Moolarben and Bylong) not considered.

Localised land use conflict and competition:

- Negative social impacts of the project must be seen in context of the localised land use conflict and competition triggered by the proposal. Approval of the project is, essentially, to prioritise this area—historically known for its agricultural production—for extractive industry.
- Whilst co-existence is flagged as an opportunity, the reality of this is slim.
- Devaluation of Bylong as a Equine Critical Industry Cluster (CIC): The loss of this industry within the valley, as well as the future reduction of agricultural production, transforms this landscape and reduces its value as a place that contributes to regional identity and sense of place. The implications of this are not considered in the social impact assessments for the project.

Displacement and greenfield mining:

- A previously vibrant rural community has become depopulated, with local people being bought out. It is deeply concerning that the DPE appears to be celebrating the acquisition strategy of KEPCO, which has led to the majority of freehold land now being in the hands of a coal company.
- Considering the lessons from the neighbouring village, Wollar, the DPE should be aware of the distinct social impacts that are embedded within this strategy and a proactive response to the implications this is having and will have on the local community should be forwarded.
- There is a distinct social impact embedded in the resettlement of the local community that is not addressed in the SIA and that will not be mitigated by the strategies proposed. This must be considered seriously before any decision can be made; the hollowing of the community is making people exposed to new vulnerabilities and risks that must be adequately considered and assessed.
- It should also be noted that the ambiguity that the local people in Bylong has been living with for an extended period of time has significant impact on people's wellbeing and ability to get on with both their professional and private lives. This is not acknowledged in the SIA or by the DPE.

Greenfield mine in 2017

- The proposed mine is a greenfield mine that will radically transform a rich agricultural landscape with distinct heritage and significance. This very fact is hardly mentioned in the documents, let alone problematised.
- Approval of a greenfield mine in 2017, when the world is moving to alternative energy sources and the impacts of climate change is felt across the globe, will have impacts beyond what is considered in the social impact assessments for this project.
- This is yet another issue that is not dealt with in the assessments of the project, yet one that could have significant political impacts through the distinct signal that it will send to the public about the Government's commitment to a sustainable future.