

PO Box 188 East Maitland NSW 2323 9th April 2019

## Dartbrook Modification 7 Bord and Pillar Mining and 5 year Extension Object

Hunter Environment Lobby (HEL) is a regional community-based environmental organisation that has been active for well over twenty years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has particular interest in biodiversity and water management issues in the Hunter Region and has held positions on the Hunter River Management Committee, the Hunter and Paterson Environmental Water Advisory Group and the Upper Hunter Air Quality Monitoring Network Advisory Committee.

We are concerned that AQC Australian Pacific Coal has applied to recommence mining after a thirteen year hiatus. We feel there will be many issues of deterioration and disuse of the underground area that may have safety issues for workers and auditors.

Apart from the unusual nature of this request after thirteen years, HEL also has major concerns around air and water quality, cumulative impacts, climate change effects and aquifer interference.

There are many other concerns that the community will have on top of these major issues, they will have a focus on air and noise pollution, social impacts, eg character and identity of this region; thoroughbred breeding, tourism and vineyards.

Many objectors also see the main concern about this reopening of an existing underground mine (lease is still current) is that it is a trojan horse for an open cut mine. The community see it as no secret in fact but APC's stated aim.

The modification is to use bord and pillar mining instead of the original long wall. It also seems because the tunnel is considered too expensive to rehabilitate the company are proposing to truck the coal across their road to just short of the New England highway and drop it down to a shortened conveyor belt.

This process is baffling unless one seriously considers it as a short term option, and that open cut really is the aim.

Because of HEL's issues with climate change, we have concerns about the gassy nature of the mine with CO2 equivalent emissions at 40 000 tonnes/ year when it is not even operating? This indeed is a concern.

In the 'Response to Submissions Dartbrook Modification on page 57 written in August 2018' it was said that the air quality issues of this modification will be minimal – but as usual there is no definitive answer as to the cumulative impacts when added to all the other mines in the area.

In our HEL submission we raised the impacts not just on humans, but on the horse breeding ventures which have large economic benefits in this area, and one which preceded the mining industry?

The response was that the modification would not 'unduly effect the human health'. As far as HEL is concerned, this is no panacea to a community who has one of the poorest health outcomes in the state of NSW. I know Doctors for the Environment would not agree with this conclusion.

Both HEL and DAMS HEG made comments to department about climate change and the response to submissions in August was rather shocking – it virtually said that because there are still many power stations being built in the world, there is no reason to look at climate change impacts attributable to Australian coal sold overseas? I know we are not the only group to find this attitude shocking and negligent.

You will find these comments in the Response to Submissions page 56 in section 3.3.2.

In a response to HTBA, about proposed drawdown from aquifers, the reply in section 3.2.9 of Responses to Submissionns was as follows:-

'As explained in Section 3.2.10, seepage into the Kayuga Seam mine workings is predicted to be very low. As a result, drawdown of the Permian aquifer (coal measures) will be limited to the area close to the proposed bord and pillar mine workings. There is not expected to be any drawdown of the alluvial aquifer.'

HEL contests the statements and asks where the predictions about 'seepage being low' and 'there is not expected to any drawdown of the alluvial aquifer' come from?

The community has expressed a concern that the coal does not seem to be going through the full process in the coal handling and preparation plant, the usual washing is not rigorous – it does seem to many that this is a minimal scheme designed to be a holding operation before an application for an open cut mine is developed and presented to the Department.

We have to say we cannot see that those conclusions are inaccurate.

Yours in trust,



Jan Davis President Hunter Environment Lobby Inc.