

OBJECTION TO WILPINJONG MINE EXTENSION PROJECT (WEP) SSD 6764 :

Thank you for this opportunity to have a say.

I have lost count of the number of submissions concerning mining projects in our area that have demanded attention since this began in the 1980s. There has been an apparently endless parade of new projects followed by further modifications or extensions. This extension, like many of these, is equivalent in scale to a whole new mine. An extension involving 40% increase (800 ha) in mine footprint changes the whole nature of the original proposal and the cumulative impacts thereof. At the moment we have not only WEP, but also Moolarben Coal Mine Mod12 PAC to respond - all unpaid and in our own time. This tactic of ongoing staged approvals is not only a heavy cost burden for the self-employed, it destabilizes future plans and strategies for our business and family. There is no certainty; it narrows further the economic base of the area, driving a wedge between mine workers and others in the community. The future long-term security of workers employment is reliant on head office priorities as determined by world energy markets, not the success or otherwise of this proposed expansion.

In this WEP a lot of time and planning has been put into management for when mining operations are proceeding; I am concerned there is far less emphasis on the years post mining. It is a reasonable prediction that we may find everything becomes the taxpayer and local community's problem post-mining: there is a high risk of an environmental legacy difficult or impossible to restore alongside ongoing cumulative impacts with no one available for redress. A current example of what we could expect from a compliant Government regulator is the original diversion of the Goulburn River that was approved by the authorities as acceptable. This legacy of past mining remains an eroding unstable structure and restoring it may cause as much damage as it solves. After community pressure efforts are being made by Glencore Ulan CM to attempt restoration. However I question how such legacies of mining can be addressed in future decades when expertise, capital and people prepared to speak out no longer reside in this area.

As stated above this proposal represents a 40% expansion (800ha) in the footprint of the current Wilpinjong mine (total 1990ha - 27.9 km²). Add this to total area of other already approved open-cut mines, Moolarben CM 32.9 km² and Ulan CM 15.5 km², and we can expect a cumulative area more than 75 square kilometers. More than 75 square kilometers of highly permeable sinks concentrated in topographical low points, filled with crushed rock and coal rejects. It is not relevant for assessing regional cumulative effects that the areas of approved and proposed open cuts comprise a relatively small part of total catchment area. All are located in natural discharge and recharge areas across the headwaters of the Goulburn River and the critical impacts will most be felt during periods of very low flows or extreme storm events.

If weather events over the last few decades and a growing worldwide scientific consensus are anything to go by the only certainty about future climate events is that words such as 'dire' 'extreme' and 'unprecedented' frequently will be needed. The claim in the WEP that this expansion despite its size will have only few incremental water impacts additional to the approved project are difficult to accept, given the limited monitoring data and modelling put forward as evidence and lack of certainty over current rehabilitation outcomes.

It also is of concern that with this expansion the mine plans to leave three highly saline open voids surrounded by a fragile fractured landscape. Future recovery of the water table once mining has ceased is likely to activate, concentrate and mobilise salts in these voids. There is a high risk this will become an extreme salinity hazard that could seep or even spill downstream to pollute the

Goulburn River. Government representatives were unable to give any specific plan for long term security management of these steep-sided deep voids to prevent these becoming death traps. This is not consistent with precautionary principles of intergenerational equity as it shifts responsibility and costs to future generations.

WEP modelling predicts 2 meters drawdown in private bore at Wollar School and 0.2 m drawdown for our bore GW8000279 which is 8 km to the north east of WEP mine. This bore has a highly productive and good quality supply on which our business and family depend. We are no longer able to use the nearby river water due to past effects from mining on reliability of supply and quality. To have this expensive alternative now affected by further mining approvals is bad enough, but a permanent lowering of our bore level also indicates a lowering of the Goulburn River to which this bore is directly connected. The WEP makes no reference to direct impacts on the Goulburn River.

My main reasons for objecting to this mine expansion can be summarised as follows :

- Worsening the deleterious effects on the Wollar and surrounding community, driving a wedge between mining and non mining members of the local community. The cumulative social impact of loss of population through mining projects from Ulan to Bylong has not been considered. This 'extension' is comparable to the new proposal at Bylong. This extension will bring the mine to within 1.5km of the Wollar.
- Negative effects on local jobs in the coal industry. This is basic economics: to increase supply at a time of depressed prices (see graph below) due to structural declines in demand, threatens the viability of coal mines and thus jobs in the whole region. The extra predicted job numbers are overstated compared with the current workforce extracting the same volume of coal.
- Destruction of 354 hectares of native vegetation and the effect of this on our precious native species and more broadly adding yet more impetus to disastrous and irreversible climate change. An additional 20 million tonnes of greenhouse gas per year will exacerbate the impacts of climate change, and is at odds with Australia's commitments under the Paris Accord.
- High risk of substantially adding to salinity on Wollar Creek and the Goulburn River.
- Leaving final voids with no clear plan for sustainable and safe management
- Cumulative impact on biodiversity, Aboriginal cultural heritage, water sources, greenhouse gas emissions, community and rural industry has not been rigorously assessed.
- The extension will remove 354 ha of remnant native vegetation impacting 24 threatened species and communities – more than the current approval. The biodiversity offsets will not provide sufficient habitat for the critically endangered Regent Honeyeater. The extension removes existing buffer zones for the Munghorn Gap Nature Reserve.

RECOMMENDATIONS:

Any expansion of the existing mine to optimise coal production should be balanced with commensurate reduction in environmental and social impacts.

This should include:

- Independent scrutiny and auditing of water, noise and dust impacts
- Removal of current approval to open cut and realign Combo Creek
- Protection of Slate Gully area as a buffer zone for Wollar
- Requirement for the complete removal and rehabilitation of final open cut voids
- A credible post mining plan for the long term management of the mined area that is resilient, environmentally robust and acceptable to the community.
- A vision/plan for the future beneficial use of the site.

Yours sincerely

Colin Imrie.

