

Att: Sara Wilson
NSW Department Planning

20 June 2013

Objection to Moolarben Stage 1: Modification 9:

Modification 9 expands the original mining footprint by 25% and the time-span of mining operations for another five years. This is no minor adjustment to give flexibility and so make the proponent's operations more efficient. Since 2007 the process of multiple modification has led to a much larger mine being sought than originally came before the expert panel and planning authorities, and with significantly increased risk of polluting the Goulburn River as part of the design. As such this expansion by increment is an abuse of the approval process.

Inescapably the formation of even bigger large-scale continuous open pits must produce ever more unmanageable quantities of turbid polluted water. Open pits and earthworks next to flood ways cannot be made safe even by claims they are above historical flood levels. The now clearly established escalation of extreme weather events set in train by human induced climate change has made all such certainties redundant. Practically and economically this project as modified will only be viable if it is publicly subsidised with an exemption allowing them to pollute the Goulburn River. This includes the Drip and Corner Gorges downstream despite the proponents claim such irreplaceable assets will somehow remain unaffected. Slugs of turbid mine water will become ever more frequent pollution events as a result of this modification, winding their way through the stunningly beautiful Goulburn River National Park, damaging the riverine environment and our eco-tourism business. This is now all within the new guidelines and not even considered worthy of mention in any of the cost calculations. The repeated assurances we received from the Premier's Office that 'the highest environmental standards' would apply to the Moolarben Coal Project and the much publicised 'one hundred conditions' justifying Stage One approval are made a lie by this incremental project approval.

Although bigger more continuous pits were not approved in the original approval the proponents now claim they need, in the public interest, to maximize the recovery of the resource. This is a denial of modern realities. With the new circumstances we all face, public interest is no longer served by full recovery of fossil fuel reserves. More the opposite, it is now established by a large and diverse range of evidence that taking coal from where it is safely sequestered in the ground and releasing it into the global climate system incurs great risk and ultimately may cost more than the total value of the resource. The greenhouse gas section of the mod.9 report acknowledges a human cause and that climate change is actually happening, but they deny there should be any limit put on the main causes of catastrophic climate change. The main contributors to the spiraling imbalance of carbon are known to be the broad-scale clearing of intact vegetation and oxidation of fossil carbon. The global scale of carbon pollution means that any measurable contribution is a significant risk and at all cost this warning should be heeded.

No longer is it responsible or ethical to allow such proposed expansion on the stated grounds.

The main justification for this modification is the promised short term profits, but more likely it will proceed at great cost to us all. MCO economic consultants appear to be suggesting that to justify any objection on an economic basis; families in Mid-Western LGA need to cite alternative threatened assets to the value of \$20,000 for each family to balance wealth predicted for this modification (see p.18, appendix L). In fact the Ulan Wollar area already has provided access to hundreds of millions of dollars in resource revenue in exchange for promises that one day all will be rehabilitated (we still are waiting for the Goulburn River diversion from the 1980s to be stabilized). As a consequence of this small local area providing a disproportionate share of wealth (mainly to private individuals) we have been forced to sacrifice our natural assets such as tourism, Aboriginal heritage, agriculture and conservation. Thus the potential to build a vibrant community in the Ulan Wollar area sustainable into the future has been stifled by the uncontrolled expansion of coal mining. The actual resource wealth this area already has provided should be set against the virtual wealth promised for the future by the advocates of this modification citing 'economic efficiency'. At the very least we are owed an unpolluted river system with the Drip and Corner Gorges included in the National Park, and that the Cooks Gap community and the Moolarben Valley should not be subjected to yet more impact from yet another modification.

The analysis of economic benefit for this modification is based on high risk assumptions claiming long term economic value applying to thermal coal. This is an illusion, volatile world economic, social and environmental factors now mean the old priorities can no longer apply. The only real certainty is that business as usual cannot continue largely unchanged. Coal fired electricity is increasingly seen in, for example, China as unpopular and polluting, while in the USA they have built few if any, new coal burning power stations for years. With or without a carbon tax, coal needs public subsidy to compete with alternatives such as gas or wind power. In any case, even if the world market were to ignore all scientific and economic evidence and continue recklessly to buy ever increasing quantities of coal, it is extremely unlikely that such a capital intensive industry is going to maintain its current employment levels. Future employment prospects for mining are just as likely to favour remote controlled miners that already are being trialed in open cut operations elsewhere. Naive predictions that 315 people will continue to enjoy highly paid jobs at MCO for years to come and then on for another five years (and we all will be enriched as a consequence) reveals a misunderstanding of the nature of the coal industry and ignores modern circumstances. It is disturbing that public policy affecting real-life communities could be based on such narrow and unsafe predictions. Future revenue from coal is not a foregone conclusion; this is an industry whose best days are behind it. The more high-risk coal mining is allowed to expand the more will be at stake when it fails.

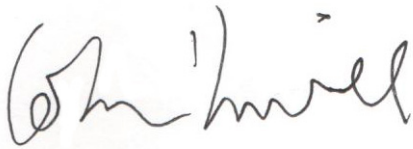
It is hard to see how the amphitheatre-like Ridge Road and Cooks Gap area will avoid increased stresses due to dust, noise, as well as the visual pollution. Dust and noise are notoriously difficult to quantify, measured levels are masked or confused by a whole

range of factors. Consequently residents have frequently experienced mine noise and dust as damaging to health and amenity of lifestyle and routinely this is worse than predicted, while being difficult or impossible to get any redress. The suggested use of overburden and tree plantings as barriers is clearly inadequate. An extensive mine haulage road becoming more than 13kms long will guarantee escalating problems especially with dust and noise levels.

The many people objecting to Stage 1 and 2 made it clear that no expansion should be allowed until the Drip and Corner Gorges are included into the National Park and excluded from all mining. It is an improvement that biodiversity offsets have been identified from within the area and a 'commitment' made. However these irreplaceable gorges are not safe, MCO is now planning an intensive coal exploration drilling program very close and to the north of the Drip. The area currently being open cut by MCO was only a short time ago set aside by the other mine as a salinity offset. Adequate offsets are good in theory, but in practice need careful consideration and are not for mining companies to keep in reserve to mine later.

Thank you for the opportunity to put my views and experience. I urge you not to approve any more expansions of coal mining. Please consider the quote below as this is my daughters' contribution and perspective for this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Imrie', with a stylized flourish at the end.

Colin Imrie BA

