

“Reclaiming our Valley”

Hunter Communities Network

PO Box 14 Singleton 2330

Paul Freeman
Mining Assessment
PO Box 39
Sydney NSW 2001

Friday 31 July 2015

Dear Mr Freeman,

**Submission of Objection
Moolarben Coal Mine: Stage 1 MOD 12 & Stage 2 MOD 2**

The Hunter Communities Network (the Network) is an alliance of community based groups and individuals impacted by the current coal industry and concerned about the ongoing rapid expansion of coal and coal seam gas exploration and mining in the region.

The Network strongly objects to the proposed modification of Stage 1 and Stage 2 of the Moolarben Mine. We trust that the Department of Planning and Environment will take our issues into consideration when assessing this proposal.

1. Mine Safety & Social Impacts

The Network wishes to raise a number of issues in relation to the Yancoal-owned Moolarben Coal Mine and its ongoing environmental and social impacts. These are poorly regulated problems and demonstrate that the mining industry is given unfair advantage over the rest of the community, including other businesses, and the environment when impacts occur.

The recent highwall collapse at Moolarben Open Cut 1 is a case in point. Local users of the Ulan-Wollar Road, including all workers and contractors travelling to the Wilpinjong Mine, have been seriously impacted by this problem and the subsequent road closure.

The village of Wollar and local residents have had to contend with a major increase of mine traffic including heavy vehicles such as B-double fuel tankers, cranes and other wide loads for over 7 weeks. The loss of the direct route to Gulgong, Wellington, Dubbo and Orange has caused significant inconvenience in both extended travel time and fuel costs. The community has had to carry this additional cost burden.

Meanwhile the sealed surface of the Wollar-Mudgee Road has been severely impacted by the heavy traffic load and has started to break up. Apparently Mid-Western Regional Council will be left to deal with this problem through no fault of theirs. This is a major impost on the ratepayers of the Local Government Area caused by poor mine operations.

The Network considers that the highwall collapse should have been fully stabilised immediately as a top priority requirement of Yancoal. The mine regulators from both the Department of Resources and Energy and the Department of Planning should have required an immediate response from the mining company to fix the problem, so that the community and other businesses operating in the area did not have to suffer the consequences for such a long period of time.

The Network considers that the Moolarben Mine is already too large for adequate and safe management. There should be no further modification of approved mine layout and workings, particularly at a time when employment numbers are being rationalised to mitigate financial losses.

2. Economic and Employment issues

Yancoal, along with most other thermal coal producers in NSW, is in financial difficulty because of low prices and drop in demand. The recent shedding of 225 jobs at the Austar and Abel Mines in the lower Hunter is a result of ongoing cost cutting.

The predicted job numbers for the proposed modifications are vastly overstated and not based on any information provided in the assessment documents.

The mine currently has approval for approximately 439 people. Stage 2 has an approved construction workforce of 220.¹

There is no discussion of the actual workforce on the ground at Moolarben Mine in the context of jobs shed at the end of 2014.

The modification proposes that an additional 30 construction workers would be needed for a peak 2 month period in 2017² but does not describe why.

Yancoal also seeks an increase in operational staff up to 667 on average with a peak of 740 required for 12 – 18 mths during 2016 and 2017.³ Again there is no explanation for this required increase in workforce.

There is no clear rationale provided for such a large increase in the operational workforce, particularly in the context of Yancoal's current policy of 'economic efficiencies' gained through reducing the workforce across all operations.

3. Increased underground ROM coal extraction

The only proposed increase in production is a 3.7 million tonnes of coal from UG1 over the life of mine. It is very unclear how the doubling of annual production rate of ROM coal from 4 mtpa to 8 mtpa from UG1, UG2 and UG4 will occur.

There has been no environmental assessment of increased ROM production from UG2 or UG4 provided. The Network considers this to be a major failing of the proposal. The assessment is

¹ Environmental Assessment p 17

² EA p 25

³ EA p 25

based on very narrow parameters that consider only the proposed changes to UG1. There is no analysis of the impact of increasing ROM production from UG2 or UG4.

There is considerable community concern about the impacts of mining in UG4 to the integrity of The Drip and base flows to the Goulburn River. Any increased intensity of extraction rate from UG4 needs further rigorous assessment.

4. Increased train movements

The Network strongly objects to the proposed increase in train movements along the Sandy Hollow Railway Line. The assessment has not considered all residents close to the line. The current train movements are causing increased delays at rail crossings and increased noise impacts at nearby residences, particularly during periods of temperature inversion.

The assessment has not considered the issue of further increase in delays at level crossings, safety aspects of access to private property or the increase in trains standing in rail passing loops and the impact on nearby residents.

We consider that the assessment of a proposed peak increase of 9 trains per day is not comprehensive and does not provide a complete overview of the impact.

The Network supports the community call to have all coal wagons covered and washed. This will help to decrease the cumulative emissions of coal dust across the Hunter region.

5. Noise and Dust impacts

We consider that neighbours to the Moolarben Mine are already impacted by high levels of noise and dust that is not adequately monitored or reported.

The changes to the Voluntary Land Acquisition and Mitigation Policy as gazetted in December 2014 have caused land owners near the Moolarben Mine to lose previous acquisition rights. This is an unfair outcome and demonstrates again the unjust disadvantage to the community provided by NSW mining policy.

The impact on community health and well-being from the operations of Open Cut 1 and Open Cut 2 are serious and need to be reassessed.

Any further emissions of air and noise pollution from Moolarben Mine should not be approved.

Recommendation

Hunter Communities Network recommends that the proposed modification of Moolarben Mine not be approved on the grounds of insufficient assessment and unacceptable cumulative impact.

Yours faithfully

B. Smiles

Bev Smiles
Convenor