

WOLLAR PROGRESS ASSOCIATION

C/O- POST OFFICE

WOLLAR NSW 2850

Paul Freeman
Assessment Planner
Department of Planning and Environment,
GPO Box 39 Sydney NSW 2001

Wednesday 29 November 2017

Submission of Objection Moolarben Coal Operations Mod 14

Wollar Progress Association wishes to object to the ongoing increase of mining operations in our area. The proposed 14th modification of the Moolarben Mine since approval in 2007 will cause increased impacts that will not be mitigated.

We particularly object to the proposed increase in daily coal train movements and increase in mine discharge into the Goulburn River as these have the most impact on the Wollar district

1. Impacts of coal trains in Wollar area.

There are four key issues associated with coal train movements in the Wollar area:

- Noise, particularly at night and early morning
- Blockage of road access at rail crossings
- Fires along the railway line
- Uncovered wagons and coal dust emissions

There appears to be conflicting information provided in the environmental assessment documents in regard to additional coal trains. The proposal is to increase rail movements from Moolarben Mine to an average of 8 trains daily with a peak of 11 trains daily.

The Main Report states that “ARTC can enable sufficient capacity to be made available for the Moolarben Coal Complex Modification”. (4.9.2 p75)

Appendix A Noise Assessment states: “it is noted operating capacities for the Gulgong to Sandy Hollow Railway are described in the ARTC’s 2016-2025 Hunter Valley Corridor Capacity Strategy (ARTC, 2016), with the physical capacity of the rail line constraining daily train movements in practice.” (p 54)

The cumulative impact of increased train movements on the Gulgong to Sandy Hollow Railway has not been adequately assessed.

1.1 Train noise

The assessment for train noise identifies that for existing and proposed/operating train movements, rail noise levels exceed both the daytime and night-time Rail Infrastructure Noise Guideline (RING) criteria.

People living near the rail line in the Wollar area down to the Ringwood Rd rail crossing are impacted by train noise, particularly at night.

The real-time noise monitors established for Wilpinjong Mine noise management would provide noise levels for passing trains 24 hours/day. Residents believe these noise levels are considerably above the RING criteria. Any noise modelling conducted for this proposed increase in train movements should be compared with real-time noise monitoring to validate the predictions.

1.2 Road access

There appears to be no assessment of the increased period of time road vehicles will be held up at rail crossings with the proposed increase in peak rail movements.

This is particularly a concern for emergency service vehicles in times of bushfire and accident.

There are times when residents in the Wollar area are held up by slowed or stopped trains blocking public roads at rail crossings. This is a key issue that has not been addressed.

1.3 Fires along rail line

There is an increasing number of fire incidents in the area associated with passing trains and the increased requirement for rail maintenance such as rail grinding.

Volunteers in the local bushfire brigade were called out to three fires along the rail line in September this year.

The management of the rail line and train fleet is a key issue that must be addressed before adding more trains to the daily movements.

1.4 Uncovered wagons

It is a continuing concern for residents near the rail line that increasing tonnages of coal are passing by in uncovered wagons.

Coal dust deposits are prevalent in all buildings in the Wollar Village. Passing trains could be one source of this air pollution combined with emissions from neighbouring mines.

2. Increased mine water discharges into the Goulburn River

There are three key issues associated with the proposed increase in mine water discharge that affect people living in the Wollar district:

- Changes in the ecological character of the Goulburn River
- Increased threat of flooding and loss of access
- Increased salt load

2.1 Changes in river ecology

Members of the Wollar community who have property fronting the Goulburn River have witnessed major changes to the natural flow variability since mine water discharge commenced from the Ulan Mine in the early 1990's.

The gradual increase in approvals for mine discharge since that time has caused major alterations to the river hydrology that has not been assessed for cumulative impact.

In the past, surface river flows naturally dried into pools and riffles or to subsurface flows during the summer period and periods of drought.

This natural sequence has now been eroded by permanent flows due to mine discharge. The proposal to increase approved mine water discharge into the Goulburn River by a further 10 billion litres per day will increase the damage to the river ecosystem.

This proposed increase would bring the combined approved water discharge from the three mines operating on the headwaters of the Goulburn River to 65 billion litres per day. This is an unprecedented regular flow in a river system that has risen in highly variable climatic conditions that cause significant changes in seasonal flows.

People living on the Goulburn River do not support further ecological impacts through unnatural increases in regular flows.

2.2 Increased flooding and loss of access

The increase in regular river flows has raised the water height at key access points on the Goulburn River.

Landholders have internal crossings on the river that will be flooded out more regularly with an increase in mine discharge of up to 65 billion litres per day. When added to natural freshes caused by rainfall, the loss of landholder access will increase. This impact has not been assessed.

The only crossing on the Goulburn River between Ulan and Sandy Hollow is the low level O'Brien's Crossing on Ringwood Road in the Wollar district.

An increase in water height flowing under the crossing is already noticeable with the joint releases from the Ulan Mine and Wilpinjong Mine. We note that Moolarben Mine has not yet discharged water into the river under current approvals.

Any additional regular flows will cause the crossing to be flooded more often during rain events.

This cuts the route for cattle transport, mine workers, tourists and local residents between the Golden Highway near Merriwa and Bylong-Wollar Road. More prolonged flooding caused by higher mine discharges into the Goulburn River is likely to cause a significant impact to access on Ringwood Road. This impact has not been assessed.

2.3 Increase in salinity

Higher levels of salinity in the Goulburn River through increased mine discharge is very concerning to landholders in the Wollar district.

Water quality is an important issue for basic rights, stock and domestic licences and water licence holders along the river system.

The potential for increased salt load and heavy metal contamination of the river is a key cumulative impact that has not been assessed.

3. Failure to meet the agreement to protect lands around The Drip

People from the Wollar area have visited The Drip on the top of the Goulburn River for generations. We are concerned that the Deed of Agreement has not been met.

Community trust in mining companies to keep faith with commitments and meet the conditions of approval for large, complex operations is justifiably low.

We do not support the ongoing expansion of the Moolarben Mine that will increase the impacts on people in the region and further degrade the environment.

Wollar Progress Association recommends that Moolarben Modification 14 not be approved

Yours sincerely



Bruce Hughes

President

wollarprogressassociation@gmail.com