

## *“Reclaiming our Valley”*

### Hunter Communities Network

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PO Box 14 Singleton 2330

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

#### **Submission of Objection Moolarben Coal Operations Stage 1 Mod 14, Stage 2 Mod 3**

The Hunter Communities Network (HCN) 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.

HCN does not support the continuing push for expansion of coal mining operations across the Hunter Region, including the mines in the western coalfields in the Upper Goulburn River catchment.

This submission will concentrate on four key issues:

1. Cumulative social impacts
2. Increased trains
3. Impacts on water sources
4. Final void

HCN does not consider that these issues have been assessed in a manner that provides decision-makers with adequate information.

#### **1. Cumulative Social Impacts:**

The cumulative social impacts of ongoing mine expansion have been extensive and are not assessed in any meaningful way. The emptying out of private landholders across the region has a major long-term detrimental impact on rural communities and their social function.

HCN does not support the conclusion of the Environmental Assessment for the Moolarben Stage 1 Modification 14 and Stage 2 Modification 3 (the Modification) that there will be no additional generation of noise or dust pollution from the expansion.

The Modification proposes to extract an additional 3 Mtpa of RoM coal until 2038 and construct a new haul road and conveyor belt and load up to an additional 2 trains per day. All these operations generate noise and dust.

There has been a major discrepancy between the properties identified for acquisition based on modelled noise and dust predictions and the actual number of properties acquired by Moolarben Coal Operations (MCO) over time. We suspect that a number of these additional properties have been purchased to meet noise and dust criteria in conditions of approval.

The ongoing social impacts of property purchase in the vicinity of MCO have not been assessed through any of the previous approvals processes. Fig 3 in the Environmental Assessment (p 11) demonstrates that a significant number of properties have been purchased by MCO over time.

This is particularly noticeable for the small blocks in the Cooks Gap area. Very few, if any, of these properties were identified with acquisition rights in previous approvals based on noise and dust modelling predictions.

There is no faith in the community that annoyance and health impacts from noise and dust caused by the Modification will not increase, based on previous poor modelling predictions. There has been no requirement for MCO to show cause for the decision to purchase the properties that were not identified to be impacted by pollution from mining operations.

There has been no consideration of the cumulative social impacts in the Ulan/Wollar/Bylong area caused by ongoing purchase of private property by mining companies.

## **2. Increased trains:**

The cumulative impact of increased train movements on the Gulgong to Sandy Hollow Rail Line has not been assessed. The increased amount of time that private and public rail crossings will be closed has not been analysed. The additional train numbers from the proposed Bylong mine have not been taken into account.

People living near the rail line all the way to Muswellbrook are impacted by train noise and are concerned about the increased numbers of uncovered coal wagons passing through their district.

The ARTC's 2016-2025 Hunter Valley Corridor Capacity Strategy (ARTC, 2016) notes that the physical capacity of the rail line will constrain daily train movements. It is difficult to understand how this proposed peak increase to 11 trains (22 train movements) daily can be accommodated on the line.

The issue of additional trains needs to be better assessed. The approved volumes of product coal from MCO Underground 1 have not yet been achieved. The currently approved number of train movements are not yet using the rail line. Likewise, the additional trains approved for the Wilpinjong Extension Project, have also not commenced to use the rail line.

HCN considers that the number of current train movements from Ulan, Wilpinjong and MCO mines have considerable impacts on local people and road traffic. Increased movements already approved from mine expansions are yet to occur.

The cumulative impact of more trains on the Gulgong to Sandy Hollow Rail Line has not been assessed.

### **3. Impacts on water sources:**

The cumulative impact of three major mining operations on the long-term health and viability of the Goulburn River is a serious issue that is not being addressed through the assessment and approvals process.

Residents living on the river have noted a deterioration in ecosystem health over time.

Increased discharges of mine water from the three mining operations contain heavy metals, salts and other contaminants associated with coal seams. This pollution is threatening downstream water users with basic rights, stock and domestic licences and irrigation licences.

The increased salt load will have a long term impact on the Hunter Salinity Trading Scheme. The proposed limit of 900EC for mine discharge is too high.

The increased volume of regular flow caused by mine discharge is increasing the likelihood of more flooding of low level crossings and internal property crossings. This access issue has not been assessed as a cumulative impact. The proposal to increase mine discharge from MCO from 10 ML/day to 20ML/day on top of the 30ML/day allowable discharge from Ulan Mine and 15ML/day allowable discharge from Wilpinjong Mine is too great a cumulative impact on the natural flows of the Goulburn River.

The disposal of brine from the proposed water treatment plant has not been resolved. The use of this pollutant laden by-product for dust suppression is environmentally irresponsible and should not be considered.

The proposed changes to Open Cut 2 will bring the mining operations 200m closer to Moolarben Creek. The impact of this combined with the impact of a haul road across the creek has not been assessed.

The drawdown of springs and soaks in the landscape caused by longwall mining and subsidence has not been adequately assessed. These water sources provide critical drought refuge for many native species and base flows for streams.

The ongoing interception of these groundwater dependent ecosystems has not been assessed. This interception has cause unpredicted inflows into Underground 1. The groundwater model is inadequate for the task of accurately predicting likely impacts from this large operation.

The cumulative impact on water sources on the mine site, regional groundwater systems and the downstream ecology of the Goulburn River has not been adequately assessed.

### **4. Final Void:**

HCN does not support the impact of permanent water sinks left in the landscape in the form of a final void. This modification could have been used as an opportunity to reconfigure mining operations so that all overburden is returned to the pit.

The final landform for Open Cut 3 should not include a toxic lake that will sterilise an area of land for any future economic use. The long term environmental costs and ongoing management costs of a final void have not been assessed.

The possible long term pollution of groundwater and surrounding surface waters is a high risk outcome of leaving final voids as a post mining legacy.

## **Conclusion**

HCN considers that this fourteenth modification of MCO cannot be justified.

The increased coal production will not create more employment opportunities at the mine. However, it will cause cumulative impacts on the Goulburn River, on the surrounding private properties and on the rail movements.

People throughout the Hunter Coal Chain will be impacted by this proposal and water users in the Hunter River catchment, including other mines and power stations, are also likely to be impacted.

These cumulative impacts have not been addressed.

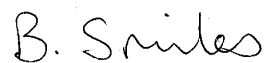
Finally, HCN is concerned that Yancoal has not met its commitments under the Drip Deed, as agreed in 2015. The company does not have a good environmental record and cannot be trusted to be a responsible manager of such a large and complex mining operation.

The current rate of coal production at MCO should be adequate for both company profits and state royalties.

The costs of climate change on the Hunter Region, causing catastrophic fire events, prolonged droughts and extreme storm events has not been costed. The coal industry should not be continuing to expand in this region.

HCN recommends that Modification 14 is rejected as too costly.

Bev Smiles



Convenor  
[bevsmiles@bigpond.com](mailto:bevsmiles@bigpond.com)

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