



Goulburn River Stone Cottages

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Submission to Department Planning & Infrastructure

Moolarben Coal Complex Stage 2 _ Preferred Project Report 08_135

1. GREENHOUSE GASSES:

Overwhelming evidence from a range of sources worldwide all give us the same clear warning: if we wish to avoid disastrous uncontrollable changes in world climate the deliberate release of fossil carbon into the atmosphere and the oceans must cease. Also we should with similar urgency cease destroying intact vegetation. If approved this project will cause to be released more than 23.7 million tonnes of CO₂e every year for decades into the future and destroy more than 900 hectares of native forest.

Moolarben (MCM)'s argument, that this coal project should be approved because if they do not supply the fossil carbon then it will be supplied by some other producer, does not alter the fact that it is this project rather than some other hypothetical project that is under scrutiny. To complain that it is wrong to single out any one project and that the only way to have fair reform is if everyone equally is last to make change, is an obvious non-argument. New overseas suppliers would take years to organize the investment and set up the infrastructure to export coal in reliable quantities and the argument that there are many potential alternative suppliers out there waiting to immediately fill the gap is not credible. Making readily available yet another long-term supply of megatonnes of fossil fuel will further prevent or delay the timely adoption of non polluting alternatives when the eventual cost of such a delay is incalculable.

The absence of plans by MCM to burn the coal themselves and the 'danger' of double counting does not alter the real harm the mining of this coal and thus its addition to the world carbon cycle will do. There are no nonpolluting alternative uses for the coal produced by this project and the only way a profit can be made from mining this coal is to sell it to someone who intends to burn it. If you deliberately initiate a train of events, you cannot plead to have no responsibility for pollution that is known to be its inescapable consequence.

Realistic evaluation of a long term, large scale issue such as greenhouse pollution should include the likely viewpoint of those having to deal with the world they will inherit when this project ends. Whether the addition of dangerous greenhouse gasses from this project is counted here or in Asia is irrelevant from this future perspective. All those who are involved in the approval and mining of this fossil carbon will be seen to have acted knowingly and as willing participants in a process directly linked to deleterious changes in the world's climate.

MCM's claim that the greenhouse gas pollution caused by this project can be calculated in such a way that it is an insignificant part of a two and a half degree rise is misleading. The average global temperature rise scenarios discussed by climate scientists are not comparable to the familiar scale of everyday things such as changes in the weather of a couple of degrees. Already, with less than one degree average global temperature rise, there have been very large scale and costly change, such as unusually energetic droughts, fires and floods and cascades of losses in biodiversity. The scale of global climate change is as big as the planet and there is no such thing as an inconsequential part of a two and a half degree rise in global temperature. Already levels of CO₂e in the atmosphere and oceans far in excess of any in human experience have been reached, and this after only a few generations of burning coal. The deliberate addition of yet more, large amounts of fossil carbon to the carbon cycle is an unjustifiable risk of harm to the only world we have to live in.

The human induced changes leading to increasing levels of energy trapped in the atmosphere and oceans are not simple, and it is pointless to indulge in linear calculations of fractions of degrees when the consequences of any part of this process can be geometric and thus incalculable. With many processes in the world a complex system can reach a point where one seemingly insignificant action allows an uncontrollable, irreversible process of change to be established. For example it was a truism in the nineteenth century that there could be no measurable harm from introducing a few rabbits and foxes into this vast country. The unfixable environmental disaster that came from these deliberate acts was based on what was essentially a failure to understand the power of geometric change. The introduction of rabbits and foxes can now be seen with hindsight as an act of foolhardy overconfidence regarding human ability to control natural processes. In our time it is conventional wisdom repeated in this PPR that such a tiny amount of pollution and biodiversity losses, relatively speaking, are a small risk compared to the predictions of profit. All the evidence suggests this reasoning is hubristic and unsound.

2. EMPLOYMENT:

Dr. Richard Denniss¹ writes in the Canberra Times...

...'taxpayers continue to provide more than \$10 billion per year in subsidies and tax concessions to the mining industry....anyone interested in restoring the budget surplus, keeping manufacturing jobs in Australia or reducing the rate at which the world burns fossil fuels should be concerned about the incredible scale of the proposed mining projects that are currently on the drawing board and the incredible generosity of the taxpayer that is underwriting this growth.'

The primary justifications for approving this project are the predictions for employment and Government revenue. When the first coal mine was proposed here in the 1980's the proponent's experts over estimated the future operational workforce by more than double. With bigger and better machines and methods the mining industry always sheds labour,

¹ <http://www.canberratimes.com.au/opinion/mining-industrys-big-lie-20120217-1tepr.html>

and so the assumptions justifying this first mining project proved to be wrong. The highly capitalised nature of the industry and the limited age and gender range of people able to take on the kind of work offered by mining companies means no matter how many projects are approved they will always make up only a small proportion of total employment in the Mudgee region and in the country as a whole.

The inherent job shedding nature of the mining industry and its history in this area means it is unlikely that this latest project's promise of hundreds of jobs and their undertaking to source locally will turn out to be achievable. In any case this old fashioned criterion is no longer sufficient for evaluation of mining projects. Economic processes such as the high rates of mining exports and their inflation of investment flows have acted over time to distort currency and interest rates. This means that further expansion of mining now is at the cost of other more significant employers both locally and nationally, such as tourism, agriculture and manufacturing. Predicted income from mining royalties and taxes will also be degraded as Government revenues from mining are more than outweighed by the very large amounts necessary to deal with the effects of the crash in employment occurring in other sectors of the economy. The wealth conferred by mining projects now has become even more overrated and inequitable than in years gone by. How mining expansion is now skewing the national balance of employment is highlighted by economist Warwick McGibbon when he said on RN Breakfast 10th Feb. 2012...

...'the only way the mining industry can continue to expand is for the rest of industry to contract'...

Also in the aforementioned Canberra Times article Dr. Denniss quotes Dr. David Gruen, executive director of the Macroeconomic Group at Treasury,

...'in a well-functioning economy like ours, with unemployment close to its lowest sustainable rate, it is not the case that individual industries are creating jobs, they are simply re-distributing them...there really isn't a multiplier.'

The predictions for this latest project fail to recognise that conditions affecting employment have changed since the global financial crisis. This final quote from Dr. Denniss' article neatly outlines these new economic circumstances...

'The mining boom has driven the dollar to record levels, and if the massive new mines currently on the books are all approved the dollar will likely rise much further in coming years. Alcoa, Qantas, Bonds, Toyota and Holden have all blamed the rising dollar for shrinking exports and employment...according to economic modeling commissioned by Clive Palmer...if his (coal) mine were to go ahead the impact on wages would contribute to more than 2000 jobs being lost in manufacturing.'

The wealth predicted to flow to the community and Governments as a balance against the certain environmental and social costs of this expansion by MCM, is likely to be considerably less than expected and may even be a net loss.

3. NOISE:

For the residents in a wide area encompassing the Cooks Gap, Sportsmans Hollow and Moolarben Valley area and for our home and business in the northeast of the project the effects of mine noise will be the most deleterious immediate problem affecting sleep, health and in the case of tourism providers the positive experiences of our guests. Past experience has shown that noise effects are routinely underestimated both in distance and intensity. Also simple noise suppression changes that should have been done in the first place, such as rubber wheels on conveyors or lowering their height in the landscape, have taken months to install or not happened at all. Former residents of Ulan endured 'dentist drill' type noise for many days and nights before anything was done, similarly residents near Wilpinjong Mine had to put up with preventable excessive noise from substandard machines for an unacceptable amount of time before the problem was reduced. The clear impression I have gained from listening to former residents of the Cumbo Valley and Wollar is that they experienced noise regulations as being ineffective to protect people from debilitating noise levels, and in practice the protocols and methods of evaluating noise acted to prioritise and facilitate industrial activity.

It is hard to believe that our family and business will not be subjected to unacceptable noise levels by this project. The noise contour maps appear to be predicting the higher noise levels being stopped by the ridges on the southern boundary of our land, any protective effects of these ridges would be ineffective when temperature inversions occur and the noise bounces off an incoming change in the weather (higher than the cliffs). Temperature inversions are mentioned in the report as occurring 41% of the time on winter mornings and evenings, winter is the busiest time in our guest cottages. At that time noise 'would propagate to the northeast (away from most receptors)' (Appendix D p.B-7) this noise propagation is directly towards our property. In any case there is no guarantee in this document showing a mechanism where excessive night noise can somehow be prevented from going towards the thickly populated and amphitheatre-like Ridge Road and Winchester Crescent area as well. If this project is approved very likely the same kind of health destroying noise will be experienced in this populous area like in the Cumbo Valley where noise was reflected off the surrounding ridges.

Also there is no mention in the noise predictions of any cumulative noise to our property from the bore field, this bore field has approval to potentially invalidate the 'safe level' noise predictions for our property. That most of the noise pollution appears to be predicted for night and early morning suggests that further restrictions on night time noise making activities are the best way if there is to be any equity for residents and wildlife.

4. BIODIVERSITY AND OFFSETS

The Stage 2 PPR mine disturbance footprint has significant impacts on remnant native forests and woodlands, local and regional biodiversity (900 has of native vegetation including 123 has of Box Woodland EEC) plus removal of over 8 kms of creek frontage (*Angophora floribunda* Rough Barked Apple riparian open forest *not River Oak*) and 148

archaeological sites. The bulk of the proposed offset area is located well outside its bioregion and approximately 50-80 kms from the Hunter catchment. The two proposed offset sites located south of Mudgee have no connectivity with the sub-bioregion or the critically important east-west corridor in the Ulan Wollar Turill area that links, at the lowest point of the Great Dividing Range, coastal forests and woodlands to those of the Brigalow belt and western slopes. This threatens the 'resilience' of the area; any offsets should connect and add to the remaining forests and woodlands. This lack of connectivity is a bad precedent, establishing that companies can get approval for, and profit from, a net loss to a catchment. However positively it is portrayed, a net loss to a catchment is unacceptable. Those charged with managing our environment are failing in their duty if they approve such an outcome.

MCM's buying out more local people is portrayed as a positive thing in this report and these families have received some monetary compensation for the pain of being uprooted from their land. The community that remains has lost unquantifiable assets such as social contact, employment opportunities and volunteers for organizations like bush fire brigades. An offset for these social costs as well as the biodiversity losses is necessary. Land that is in the catchment and being offered for threatened species offsets (property 18 in Ulan) is not only intersected by the railway it is also in an area subjected to mining noise and in close proximity to the new 'Ulan Industrial Area' with its accommodation for 150 mineworkers. It is very unlikely threatened species will be able to use this area with the lights, noise and clearing that will go on nearby for many years.

The MCC PPR offset package does not include the regionally and culturally significant 'Drip and Corner Gorges'; a riparian corridor and Groundwater Dependent Ecosystem (GDE) located on the Goulburn River between the Ulan Road and Goulburn River National Park and immediately to the north of the Moolarben Coal Mine. The Drip and Corner Gorge are recognized as high conservation, highly valued by the public and used extensively for recreational and educational purposes. This riparian corridor vegetation and GDE is closely representative of and connected to the area to be impacted by mining, it is already owned by MCM, and in correspondence and in newspapers spokespersons for MCM have stated that, for example, there is a voluntary mining exclusion zone protecting the Drip or that there are no intentions to mine anywhere near that area.

All stakeholders (including MCM) agree as to the high value of this area. As well MCM has repeatedly declared that the Drip and Corner Gorges are unencumbered by any plans for mining. This land fulfills the requirements for offset land, better than any put forward as an alternative. If there really are no intentions for mining in that area and we all agree on its value, what is the problem with the reasonable request by many in the community to secure it for public ownership in perpetuity?

MCM's claim that the forest they are planning to destroy is well represented in the National Park is a narrow focus and thus blind to the fact that the rural environment of farmlands, remnant bush and tree lined roadsides being destroyed by this project is hardly reproduced by inaccessible sandstone ridges. Publicly owned assets like National Parks are not locked up bush land, they are also recreation and cultural/educational assets. The

Goulburn River Park has restricted legal all-weather access and one of the many advantages of the Drip and Corner Gorges is that it is a short sealed-road journey to get there. Children, elderly people and school groups can enjoy an experience on the Drip Walk when for anything comparable in other areas you would need to be a well equipped bush walker. If included in the National Estate the Drip and the Corner Gorges will form the only legal public access to the Goulburn River Park for this end of the river. People need to feel they can go there without asking permission and this can only be guaranteed if access to this unique place is no longer through private property.

It is a question of whether a mining company or the National Parks are best suited to managing high conservation land. Any offset package for this project must begin by recognizing the importance of transferring the Drip block (Lot 45/DP750750) and river corridor including the Corner gorge (northern section 30/DP755439) into the Goulburn River National Park to secure the long term protection, appropriate management and on going public access to this high conservation value area. MCM should be required to fully offset in the same catchment for all the losses their project will cause.

5. DUST

Air quality is another specialist area not possible for ordinary people to fully appreciate in the time available. We have regularly seen large plumes of dust palling over MCM's site and in Wollar heavy metals were reported in rainwater after mining commenced in that area. In the report there is only one testing station on our (northern) side of the project. More air quality testing station are necessary in the northern end of MCM land. This would better inform the ongoing monitoring of air quality this side of the project. As we have five rainwater tanks on our home and guest stay business and we are responsible for the safety of our guests it is only fair that regular testing of this rainwater for contaminants should be paid for by MCM.

We request that the setting up of additional air quality testing stations and the regular monitoring of our rainwater be made one of the conditions of approval.

6. WATER

- Permanent damage to the Goulburn River and connected groundwater is an unacceptable outcome of approving this project.
- There are significant disparities in the groundwater modeling between MCM and Ulan Coal Mine (UCML) groundwater assessments and there is no basis for confidence in their predictions for water impacts.
- MCM's hierarchy of water sources should clearly prioritise UCML surplus water and avoid any extraction from the Northern Bore field. Their predicted shortfall in water supply should not be made up from already over extracted groundwater.
- This project will result in a reduction of catchment runoff and MCM should be required to allocate water to offset this loss and reduction in baseflows (0.5ML/d?) to the Goulburn River.
- The simplistic labeling of the Triassic layer of groundwater as 'perched' and somehow unaffected by subsidence cracking and depressurizing the underlying

groundwater system is a claim that denies the vertically faulted nature of the landscape, is in contradiction to the experience of UCML and in conflict with MCM's own pump testing report in 2010-11 (p.13, MCM AEMR 2010-2011).

In the Stage 1 Approval Conditions MCM was required to compensate or replace water loss. In this report they are claiming that there will be no affect on our water supply, and any affect is due to UCML 400m wide long walls. If this is accepted this leaves us vulnerable with both Coal mines potentially blaming each other for impacts on our water supply potentially leaving us with no redress.

We wish to lodge our objection to the Moolarben Coal Mine Stage 2 and urge the Department of Planning to instigate a Planning Assessment Commission to closely examine the many specialized and complex issues relating to such impacts as on water and biodiversity and effects of noise and air quality as outlined in this submission.

Yours faithfully,

The image shows two handwritten signatures in black ink. The signature on the left is 'Colin Imrie' and the signature on the right is 'Julia Imrie'. Both signatures are written in a cursive, flowing style.

Colin Imrie & Julia Mullins Imrie

Goulburn River Stone Cottages
24 February 2012