**MW**can **Mid Western Community Action Network**

# Objection to the Moolarben Coal Complex Stage 2 _ Preferred Project Report: Project No: 08_0135 Due Friday 24 Feb 2012

Send submissions to:
Email: plan_comment@planning.nsw.gov.au

Mail to Mining and Major Industry Projects
Dept of Planning and Infrastructure
GPO Box 39
Sydney 2001

Mid Western Community Action Group (MWCAN) formed over concern regarding the rapid and recent expansion of coal mining and exploration and Coal Seam Gas (CSG) exploration in the Mid Western region of NSW.

On behalf of MWCAN, I would like to make the following submission of objection to the Moolarben Coal Complex Stage 2 Preferred Project Report (MCCS2PPR) .

**Highly significant and rare natural area -The DRIP and BIODIVERSITY OFFSET**

MCM was asked by community, council and Government to include The Drip and Corner Gorges in its proposed 'offset package' as some compensation for the loss of biodiversity, riparian habitat and community amenity but unfortunately rejected the proposal.

The Drip and Corner Gorges are not included in the offset package. This ancient, unique, beautiful and culturally significant river corridor area **must** be included in the Goulburn River National Park and **must** be protected from the impacts of mining. Any potential impacts 'the Drip' are totally unacceptable.

High level seepages will affect 'the drip'- a highly valuable and rare ecosystem that should be of national significance for its scenic and cultural values.

The government should reverse the former conversion from Crown Lease to freehold title that has endangered the Drip immediately. The company was previously asked by community, council and government (OEH & Planning) to include The Drip and Corner Gorges in its proposed "offset package" as

partial compensation for loss of biodiversity, riparian habitat and community amenity but this has not happened.

Two of the proposed properties (Property 9 and 17)to be used for biodiversity offset are located in western watershed country, this does not represent the country that will be destroyed in the course of Stage 2. Nor do these properties replace the net loss to the bio-region or the clearing of over 900 hectares of native forest .

**AIR QUALITY**

Most if not all the data referred to in the Moolarben Coal Preferred Project quality impact assessment refers to $PM_{10}$ parts per million. It is the $PM_{2.5}$ parts per million and less atmospheric emissions mining creates that are especially dangerous to our health because they are small enough to pass from the lungs into the blood stream but still have hundreds of chemicals within them.

Tapered Element Oscillating Microbalances (TEOMS) were used to collect all air quality data. It is well known that baseline measurements can be manipulated without detection using this equipment. Beta Attenuated Monitors would have provided far more accurate and reliable air quality data.

The MCCS2PPR states that ( Vol. 1 Section 4 p. 43) 'exceedances in the $PM_{10}$ criteria of 50µg/$m^3$ is probable as the background datea already includes values exceeding these levels. On this basis, the actual number of exceedances cannot be predicted precisely..'

Any exceedance is completely unacceptable from a health and environment perspective. $PM_1$ open cut emissions in the Hunter Valley have been estimated to be as high as 250 micrograms per cubic metre. The United States (US), Japan and Finland have had identical Federal Clean Air Acts in place since the 1990s to ensure emissions are kept below 15 microns per cubic metre. US research concluded that the total cost of people getting ill and dying prematurely as a result of coal production and coal fired- power station pollution was five times the value of the coal.

1

**GREENHOUSE GAS**

Moolarben Coal Mine (MCM) plans to produce 17Million tones of coal per year. This equates to 23.7 Million tonnes ($co_2^{-e}$) of Greenhouse Gases per year. This is no small contribution to global climate instability.

MCM justifies this by stating (Vol 1 Section 4 p.46) that 'emissions from burning of the product coal will be significantly greater than those associated with the extraction and processing of the product coal from the MCC' and that, 'Scope 3 emissions from sources would still occur regardless of MCC. The product coal would be sourced from other coal suppliers, with the end result being the same.'

Surely this is the worst sort of argument- if we don't do it someone else will ! But actually if we stop doing it others are likely to take notice. In this particular case where China is a large holding in the property and a large polluter- through our unabated assistance.

**NOISE**

MCM by its own admission states that those living in the locality will experience minor to moderate exceedances in operational noise, road and traffic noise and sleep disturbance. Some will experience significant exceedances.

MCM indicates that where practical it will adopt measures to minimize this but will not be limited by it. Any exceedance is unacceptable. At the very least the location of the coal conveyor must be sound attenuated and set lower in the landscape than it presently is.

**GROUND and SURFACE WATER**

Creek Water flow – pp4 In discussion with water flows which are referenced in Appendix F as 'negligible flows' despite significant rainfalls - how if at all was water movement and storage underground assessed?

It is not unusual in this region for water in sandy or stony creeks to be flowing still under the surface. The ground surface water is only one measure - water can and will infiltrate into the subsurface and still be an important source of water for trees and other plants.

The significant disparities between the Moolarben and Ulan Coal Mines groundwater assessments is proof enough of the lack of accurate data regarding groundwater flow in the area. Without real-time baseline measurements how can the impacts both short and long term on ground water be accurately predicted.

Further pollution and damage to the Goulburn River is totally unacceptable. The River flows through the pristine Goulburn River National Park downstream from MCM. Incredibly, there is no monitoring or knowledge of the impacts of mining pollution on the species diverse and protected wildlife and vegetation of this beautiful National Park.

This nationally significant River and its connected groundwater system must be protected from the impacts of mining.

The MCCS2PPR indicates that it is *unlikely* that high level seepages such as the Drip will be impacted by MCM. Surely '*unlikely'* leaves too much doubt for an area of such cultural and heritage importance as The Drip.

**WATER QUALITY**

The intention is to 'maintain water quality', but that has not been the evidence so far in Moolarben's mining past. One of the writers of this submission was present at The Drip when water discharged from Moolarben was overburdened with sediment, causing consternation to the public walking nearby.

If this is how Moolarben deals with an overburden of dirty water, why would they change when they expand?

**DROUGHT**

Much is made in the MCCS2PPR of the low water in the affected creeks and the difficulty of measuring its real flow. Drought is given as a main reason for this. Drought may be entirely the way of the future in this part of the country- or climate change caused in part, by the use of fossil fuels.

Some discussion and recognition of the effects climate change is and will have on the area should be made.

**SUBSIDENCE**

Thirteen new long walls are proposed with a large number to be under ground in excess of 100 metres depth.

Long wall mining allows for the collapse of the land behind each completed section. How is it possible to carry out this form of mining below a water system that is not understood?

It is impossible to believe that water from the surface creeks will not be altered permanently by the cavities and sub surface disturbance this form of mining makes. Once a creek goes underground it will surely be lost.

**ABORIGINAL ARCHAEOLOGY AND CULTURAL HERITAGE**

One hundred and forty-eight Aboriginal Cultural Heritage sites are likely to be impacted as a result of the MCM stage 2 project.

**REHABILITATION**

Rehabitation regeneration. (section 1 P17 and section 8, p 41 Rehab performance). Rehabilitation is something that mining companies have not, as yet, managed with any diversity such as natural systems. If they could point to genuine successful areas that have been re-habitated by fauna in our region that would be beneficial.
Nearby Ulan Mine has not as yet achieved anything like 'natural success' although they have covered the ground with some plants. A recent inspection by the Ulan Community Consultative Committee revealed weeds and erosion and a lack of diversity in chosen plants, as the main winners.

Do Moolarben Consultants have any successful examples or rehabilitation and regeneration.

The report names the required plants – but soil type, humus, compost is not indicated, and how it would be successfully installed, developed over time, and how it would be irrigated in the early periods. P41 suggests approx 5 m spacing of plants – which seems particularly well spaced and minimal cover. Other areas suggest stock piling of top soil- always a good intention, but topsoil will spoil, grow weeds and kill the lower ground below it.. The small animals that make up a healthy soil can only live so deep. Perhaps the companies would need a real source of good healthy top soil to take from another area ?

Mining is unquestionably a short-term land use and even after 'rehabilitation', the destruction to a mined area's water quality and availability and the environment as a whole is devastating and permanent.

Soil in its natural state is made up of intricate layers of sands, clays etc and the water permeates slowly through. The soil is compacted which also adds to its water holding capacity.

When the ground is dug up, mining companies, in Australia, are only obliged to keep the top soil and the next layer of subsoil separate, they are not obliged to compact the ground to its pre mined state.

So even before considering the loss of the intricate soil layers built up over thousands of years, the mound, combined with the lack of proper compression causes the permeability to be much greater. All the water rushes through and drains out the bottom. It will have little if any water holding capacity.

Blackman's Flat on the way to Singleton passed Jerry's Plains in the Hunter Valley is a great example. All the trees have died on top of the mound. It appears that one of the only plant species that can survive is Rhodes Grass, which is an introduced Summer- growing grass.

Is this what we are to expect from the Moolarban Coal Mine rehabilitation experience?

**SOCIAL AND ECONOMIC IMPACTS**

In 2009 the Central West was ranked in the top 20 tourist destinations in Australia. Tourism and tourism-related industries have a higher labour intensity than mining. Between 1996 and 2001 mining employment in the Hunter Valley dropped by 27% while production doubled. Tourism is a long term and sustainable industry which can only be damaged if not destroyed by the expansion of coal mining.

Mudgee is already experiencing the artificially inflated housing market as a result of the growing mining population which has lead to a lack of affordable housing for non mining families and locals. Lack of available accommodation for tourists visiting the region is becoming a widespread problem.

The Mid Western Regional Council is feeling the financial cost of upgrades to mine related infrastructure, for example, the massive cost to upgrade the Cassilis Rd which services Ulan, Wilpinjong as well as Moolarben Mines.

The Voluntary Payment Agreement offered to Mid Western Region Council is on $1.365million and totally inadequate.

The local community is experiencing the loss of trades people and rural youth from the district to the mining industry. Local businesses cannot compete with the wages offered by the mining giants.

**IN SUMMARY**

- The impacts ion the highly significant area known as 'the Drip' are totally unacceptable. High level seepages will affect 'the drip'- a highly valuable and rare ecosystem that should be of national significance for its scenic and cultural values.

- The Drip and Corner Gorges must be included in the offset package. As stated earlier this ancient, unique, river corridor area must be included in the Goulburn River National Park and must be protected from the impacts of mining, now and always.

- The government should reverse the former conversion from Crown Lease to freehold title that has endangered the Drip immediately.The company was previously asked by community, council and government (OEH & Planning) to include The Drip and Corner Gorges in its proposed "offset package" as partial compensation for loss of biodiversity, riparian habitat and community amenity but this has not happened.

- The air quality in this report is does not address the most dangerous emissions. It is the particles $PM_{2.5}$ parts per million and less that are especially dangerous to our health because they are small enough to pass from the lungs into the blood stream but still have hundreds of chemicals within them. These particles are created by mining.

- Yet another large contribution to global climate instability and air pollution.

- This mine will make significant contribution to moderate exceedances in operational noise, for those that live and holiday in the area and for the fauna in the nearby national park.

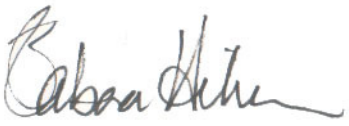
- Ground water below the surface in creeks is entirely missing from the report either as a measure or as an acknowledge important environmental value. The report lacks an understanding of the water systems that operate here.

- Further pollution and damage to the Goulburn River is totally unacceptable, but has been part of the practice of this mine, and can only be expected in the future.

- True rehabilitation, or new habilitation with a bio diverse environments has not been achieved to date by mining companies in the district and they need to acknowledge this. What safe guards, what recompense is possible at the end of a mining operation when waste land is left behind.

- It is most likely that Long wall mining with over 100 m of land above it will suffer land collapses and damage to the water systems.

The cumulative effects of this mine and the very many others mining operated or proposed in its vicinity will cause depleted tourism , reduced air quality, excessive noise and the removal of fauna habitat. These mines, all with ramped up targets for production must be checked. It is not acceptable or sensible to look any at one mine's operation i



**Barbara Hickson**
**President MW*can***