

Major Project Assessment
Department of Planning & Infrastructure
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Sydney NSW 2001

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Submission of Objection

Wilpinjong Coal Mine Project Modification (05_0021 MOD 5)

Mudgee District Environment Group (MDEG), based in the Mid-Western Region local government area in NSW, is working for the conservation of our natural heritage and a sustainable future for our children.

MDEG objects to the Wilpinjong coal mine project modification (Mod 5) for the following reasons:

1. The impact of the current approved operations is too great for the surrounding environment and community
2. There is no clear justification for the need to extract an additional 3 million tonnes of coal over the life of the current mine approval
3. The cumulative impact of the mine on biodiversity, air quality, noise, water, Aboriginal cultural heritage, greenhouse gas emissions and community has not been adequately assessed in the context of current Wilpinjong coal mine approvals
4. The cumulative impact of the mine on biodiversity, air quality, noise, water, Aboriginal cultural heritage, greenhouse gas emissions and community has not been adequately assessed in the context of the adjacent Moolarben and Ulan coal mine operations and proposals
5. The social impacts of current and proposed operations have not been adequately assessed
6. The proposed biodiversity offset package is inadequate

Introduction

MDEG has followed the progress of the Wilpinjong coal mine development and operation since the project was first considered in the late 1990's. The information provided to the community, the reports provided to the Government and the reality of the impacts on the ground once the operation commenced are vastly different.

The community has no trust in the modeling used to predict environmental impacts from large coal mining projects in the region because they invariably understate the scale of impact.

The ongoing need for the Wilpinjong operations to be modified is a testament to the quality of the information that was provided for the original approval in 2006. The mine has significantly expanded its impact on the community and the environment above the predictions provided in the May 2005 Environmental Impact Statement (EIS) which formed the basis for the mine approval.

These increased impacts include the number of properties acquired to manage noise impacts, the requirement to discharge water into Wilpinjong Creek, the ongoing impact of spontaneous combustion odour and the social disintegration of the Wollar district. None of this was predicted in the original EIS.

This proposed fifth modification emphasizes the issue that information provided to the Government has been either incomplete or misleading. The third modification that allowed the extraction rate to increase from 13mtpa to 15mtpa was for the life of mine. Now the company is claiming that this mining rate will have extracted coal at the maximum rate until 2018 when it will then need access to a further 3mt to maintain that rate.

Biodiversity Impacts

MDEG objects to Wilpinjong Mine destroying a further 70 ha of land that contains 52 ha of native vegetation including 10.6 ha of critically endangered ecological community (CEEC). This area provides high conservation value habitat for a significant number of native fauna species including 9 threatened species listed for protection under state and federal legislation.

The cumulative impact of habitat loss on the same suite of threatened species in the region due to habitat destruction for open cut mining operations has not been identified in the Mod 5 assessment report.

The provision of biodiversity offsets at large distances from the point of impact will not mitigate the ongoing decline of habitat and woodland fauna species. The previous biodiversity offset for the loss of 47 ha of was entirely inadequate. The current proposal for a 4:1 offset of like-for-like vegetation is also inadequate to compensate for cumulative loss of native vegetation on the mine site.

MDEG also objects to the proposed removal of 20 ha identified in the original approval as a regeneration area to mitigate the loss of native vegetation links across the mine site.

MDEG is concerned that there has been no monitoring of impacts from noise, light, dust and increased pressures from displaced fauna on the neighbouring Goulburn River National Park or Munghorn Gap Nature Reserve.

Noise Impacts

The Mod 5 assessment maintains that *Operational noise levels in the Goulburn River national park and Munghorn Gap nature reserve from the Wilpinjong Coal Mine incorporating the Modification would be generally comparable to the approved mine* (4.22 p 36). This statement cannot be backed up by any on ground monitoring of noise or other impacts within the reserves.

MDEG is particularly concerned that the assessment for Mod 5 indicates that the required noise attenuation of the mobile fleet on-site, in order to comply with project approval noise criteria, will not be undertaken.

The intrusive noise contour maps for night-time noise in adverse weather conditions as provided in the assessment report are indicative only. Similar maps provided in previous reports have proven to be incorrect. MDEG maintains that ground truthing of past noise modeling predictions needs to occur before the new predictions can be considered in the approvals process for Mod 5.

The reason for the number of noise complaints dropping, as outlined in the assessment report, is that the company continues to purchase properties rather than manage noise on the mine site. People are literally being driven from their homes due to the untenable impacts of this mining operation.

The social and health impacts caused through stress, loss of sleep, loss of neighbours and loss of social support systems has not been recognized or assessed in any way.

The Wilpinjong operation has exposed the callous nature of the mining industry and the Government processes that support it.

Blasting

MDEG objects to the proposed increase in larger MIC blasts by combining individual adjacent blasts into a single combined blast. This will cause greater environmental impacts, particularly on the adjacent reserves, that will not be adequately monitored or mitigated.

The company's response to any increased blasting impact on the remaining residents of the area is to purchase their property and move them along. This would be indicated in

the updated blast monitoring network to reflect current land ownership in the Blast Management Plan.

Blasting impacts have been felt down the Barrigan valley under the current approved conditions. Any increase in MIC will be unmanageable.

Spontaneous Combustion

The Wilpinjong Mine has had a significant problem with spontaneous combustion (spon com) that is causing loss of amenity for remaining landholders in the district.

The original EIS for the mine indicated that there would be a 'moderate susceptibility' for spon com from the coal types. The carbonaceous waste materials have now been discovered to have a higher spon com propensity. This is further indication that predictions made during environmental assessments for coal mines are often considerably understated.

A recent monitoring program was conducted between March and June 2013. This was to test the impacts of spon com on the village of Wollar and residents of Cooks Gap while two significant stockpiles containing spon com material were disturbed (Keylah Dump and Noise Bund). The monitoring period was to provide an indication of impacts over an 18 month period.

During the time of monitoring material was disturbed at Keylah Dump only during April and May, while the Noise Bund had material removed during March, April and May. Neither stockpile was disturbed while monitoring was in progress during June.

MDEG believes that the results of the monitoring, as reported by Pacific Environment Limited (2013), are not a valid indicator of the impacts experienced by the community over a much longer period of time.

The fact that the report concluded that it was difficult to determine pollution sources and that Wilpinjong Coal Mine was not indicated as the primary source of any pollutant is further indication of the invalid nature of assessment reports commissioned by the mining industry.

The Wollar area has had no issue with hydrogen sulphide odour prior to the spon com events at Wilpinjong mine. To suggest otherwise is a complete fallacy and a disrespectful attitude to the remaining residents of the area who have experienced a significant loss of amenity since the disturbance of Keylah Dump and Noise Bund stockpiles.

The proposal to extract a further 3 million tonnes of coal and produce an additional 5.3 million bank cubic metres of waste rock annually could significantly increase the spon com impacts from the mine.

Conclusion

The Wilpinjong Coal Mine has had a range of significant environmental impacts above those predicted in the original and subsequent assessment reports.

MDEG does not accept that the assessment of Mod 5 reflects the extent of these impacts. The assessment report concludes that there will be no cumulative impacts from the expansion of coal extraction. This type of conclusion has been proven to be wrong in the past. The community has no faith that the predictions for Mod 5 will be correct.

The justification for the modification does not warrant an increase in the ongoing significant social and environmental impacts caused by the current operations of Wilpinjong Mine.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'I. J. McAdam', with a long, sweeping horizontal stroke extending to the right.

Ian McAdam
On behalf of MDEG