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### **Submission on the Bylong Coal Project**

I have reviewed the EIS for the Bylong Coal project and would like to make the following comments.

#### **Fairness of Exhibition Period**

1. There was a voluminous amount of information to review and I would like to propose an extension of the submission period so that more stakeholders have a chance to first hear more about the development proposal and secondly to review, understand and prepare a well crafted submission. Given that the authors of the EIS had at least two years to prepare the document, I think it is only fair to all parties to allow more time for submissions.

#### **Validity of Need For Open Cut Operations**

2. One of the stated objectives of the project is to give the Korean Government a reliable source of coal over the next twenty five years. This objective was also used in a similar proposal to mine coal from the proposed Wyong underground mine ( known as the KORES project). Consequently if the objective is to be optimised, the financial need for a first period of open cut mining of 1-12 years to boost productivity should be established and analysed in the document. If there is no immediate need for profitability by the proponent but only assurance of the supply of coal, then the extra early expense of the underground only option is a socially viable option for both the proponent and the affected community and should have been analysed as the base option.

3. After discussion with stakeholders in my area, an option only involving underground mining would be a much more preferred one. The issues of visibility, involving significant noise dust generation, debate about visual impacts on the highly prized and nationally significant Bylong Valley Way would disappear with such an option (see pages 159-173 of Appendix AC). Also it is clear that further analysis of such an option would also address some of the highly variable (boom and bust) workforce impacts of dealing with two peak construction periods which

are documented by the proponent as socially significant impacts in Appendix AC- Social Impact Assessment.

### **Analysis of Results of Stakeholder Engagement (Appendix F)**

4. The social impacts of the development are significant both positive and negative. It is a development proposal which deserves a much improved analysis of the stakeholder engagement program. The SIA in Appendix AC acknowledges that a Stakeholder Engagement Program has been conducted by a number of groups including Cockatoo Coal, Worley Parsons & AECOM. The appendix document could best be described as project information not engagement. The appendix simply shows a series of community newsletters that were distributed over the course of the past three years. There has been a community liaison officer on board and funded by the various managers for this period. There appears to have been generous funding given by the proponent to support various worthwhile community activities during this time. However, there is no report which describes the program, its objectives and more importantly its results. Funding of community based projects although laudable and desirable should not guarantee community acceptance.

### **Validity and Reliability of the Social Impact Assessment (Appendix AC)**

5. The primary impact area has been defined in the Social Impact Assessment (SIA) as being a one hour commute from the proposed site. There is also an assumption in the workforce impact analysis that the road to Mudgee via Wollar will be upgraded so that Mudgee will also be in the primary impact area for operations. Due to the limitations of the scale of the ABS Census data (recognised in the document appendix) the population in this area includes most of the Mid Western Regional Council area. Consequently the population of the primary impact area is reported to be approximately 23000. However, the primary data used in the SIA only includes consultation with a very small percentage of stakeholders who are inside this primary area. The methodology for collecting data in order to analyse the social impacts were described as follows:

*“A number of different but complementary approaches were used to consult with stakeholders during the SIA consultation stage. These included:*

- Individual face-to-face interviews with residents of the Project Area;*
- Face-to-face and telephone meetings with MWRC LGA representatives; and*
- Telephone discussions with State government agencies and key service providers. Stakeholder issues and perceived impacts have been considered and assessed in the technical assessments supporting*

the EIS, including this SIA. “..... page 25 Appendix AC

Also, the factors which were used to assess impact were listed as follows:

### **Factors**

*“The characteristics of each potential social impact were analysed with reference to the following:*

- Desirability – whether the impact is positive, negative or neutral;*
- Project or Cumulative – whether the impact is likely to be caused by the Project and/or as a result of cumulative mining resources in the SIA Study Area;*
- Project phase – whether the impact is likely to be as a result of the construction and/or operations phase of the Project;*
- Geographic extent – the geographical area(s) which the impact will affect (it is noted previously that this SIA focuses on the impacts expected in the Project Area and Sub Regional Study Area);*
- Timing and duration – whether the impact is likely to be immediate (either at the beginning of the Project construction or operations phase) or delayed (at certain years of the Project, which has a 25 year horizon); and*
- **Acceptance - the extent to which the impact is consistent or inconsistent with stakeholder aspirations. This indicator is primarily informed by the findings of SIA consultation. “.....***

*page 23 Appendix AC*

6. According to the analysis, the findings of the SIA consultation were based on consultation only with stakeholders from the immediate project vicinity. This represented 33 households or approximately 100 resident stakeholders from a population in the primary study area of 20000.

7. In other words the indicator or factor of **acceptance** is based on an extremely low percentage of consultation with directly affected stakeholders. It is abundantly clear that the sample of the population represented by the immediate impact area is not statistically valid and extremely unreliable. It cannot possibly be concluded that the proposal is “consistent or inconsistent with stakeholder aspirations.” For a 95% level of confidence, the minimum sample size for the population of around 9000 households is 383 (J Watson, 2001) . A statistically valid and more reliable data base is clearly needed here.

8. The small sample size has led to serious gaps in consultation with a host of other stakeholders. There would appear to have been no project

specific consultation with a sample of the residents of Rylstone, Kandos, Lue, Wollar and of course the residents of Mudgee to discuss their attitudes and perceptions regarding the project. The document appendix suggests that the smaller villages will not be significantly affected by the proposed construction workforce scenario of 800 with 650 workers living in the Worker Accommodation Facility (WAF )within 38 minutes of Rylstone and Kandos and the other smaller towns. ( page vii). Then it is reported that there may be an impact on Rylstone hospital ( Page X). Then further on it states that there will be an impact on Rylstone Hospital. It is difficult to understand how such conclusions and confusion could be reached without consultation with any of the resident stakeholders.

*“The construction phases of the Project will have little noticeable impact on the population size of the MWRC LGA as the majority of workers are anticipated to be NLHs who reside permanently outside of the MWRC LGA and will be accommodated in the WAF in Bylong Valley while on roster. ( page vii)*

*Health services and facilities – During Construction Phase 1, the health facilities in Rylstone may experience an increase in demand from the construction workforce. Rylstone is the closest urban centre to the Bylong Valley and the proposed WAF.*

*(page x)*

*If the majority of the construction workforce resides in the proposed WAF, the largest impact on health services is expected to be on the closest health facility to the WAF i.e. Rylstone MPS and Mudgee Health Service. ( Page 203)*

9. The residents of Rylstone, Kandos and other towns such as Lue may welcome the social interaction with the construction workforce as they seek out other social outlets and recreation. Surely the SIA should have at least broadened its investigation to find out perceptions and attitudes of a more representative cross-section of the “primary impact area.” There is a lot of hamburger in this analysis- a real lot but a serious lack of sirloin. Lets make sure we have spoken to a fair, statistically valid and reliable sample of all the directly affected stakeholders. ( no pun intended).