

Submission of Objection: Bylong Coal Project: SSD 14_6367

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.

Mudgee District Environment Group (MDEG) strongly oppose the Korean power company, Kepco's development proposal to mine 6.5 million tonnes of coal per year (Mtpa) over 25 years from 2 open cut pits (8 yrs) and an underground mine in the highly fertile Bylong Valley. MDEG have the grounds to believe that this development will provide detrimental impacts to the environment in a number of major areas, including prime agricultural land, ground water and surface water. It will also destroy and disturb nationally endangered species and critically endangered Grassy Box Gum Woodland remnants. MDEG highlights the Social impacts that are also evident.

MDEG wishes to submit comment on the following areas that are identified as major impacts:

1. Predicted Long-term impacts on prime agricultural land.
2. Groundwater and surface water impacts.
3. Impacts to Nationally endangered species and critically endangered biodiversity remnants.
4. Disturbance to significant Aboriginal cultural heritage.
5. Major Social impacts to the people of the local community.
6. Failure of Biodiversity Offset Strategy to mitigate biodiversity impacts.

Detailed information regarding these impacts follows.

1. *Predicted Long-term impacts on prime agricultural land.*

The predicted long-term impacts on prime agricultural land and water systems in the Bylong Valley that are clearly defined are unacceptable and will not be mitigated through proposed offsets and rehabilitation.

The renowned Tarwyn Park 'Natural Sequence' farming processes that have been developed over a 30 year period to reintroduce natural valley flow patterns creating natural hydrological and fertility cycle to the landscape will be destroyed.

A significant area of prime agricultural land will be destroyed. The mine footprint will disturb 2,875 ha of land including 440 ha of Bioregional Significant Agricultural Land (BSAL), 260 ha being destroyed in open cut, plus 700 ha of mapped Critical Equine Industry Cluster land.

The proposal to replace BSAL at another location is untested and high risk.

2. *Groundwater and surface water impacts*

Impacts on groundwater and surface water will be significant. The highly connected alluvial aquifer system within the stressed Bylong River catchment will have predicted peak losses of up to 295 million litres per year (ML/yr). Loss of base flows to the Bylong River is predicted to be 918 ML/yr. The mine proposes to use up to 1,942 ML/yr which is over 75% of the annual rainfall recharge. The river system is over allocated and local farmers will lose this important water supply and which will severely impact on future agricultural growth/food production.

3. *Impacts to Nationally endangered species and critically endangered biodiversity remnants*

The mine disturbance area has high biodiversity values that will not be mitigated through the proposed offset arrangements. Nationally endangered species recorded in the area include the Brush-tailed Rock Wallaby, New Holland Mouse, Regent Honeyeater and Spotted-tailed Quoll. Three entirely new plant species have also been recorded.

A significant area of critically endangered Grassy Box Gum Woodland will be destroyed along with habitat for 17 threatened birds and 7 threatened plants. This ecological community is listed under New South Wales (NSW) legislation as an endangered ecological community, White Box Yellow Box Blakely's Red Gum Woodland (Box-Gum Woodland). It meets Criterion 1 as critically endangered due to its very severe decline in geographic distribution; and Criterion 4 as

critically endangered as its integrity is being very severely reduced across most of its geographic range. With further reduction of Grassy Box Woodlands and predominant native grass/flora species will decrease the overall already critical distribution.

4. *Disturbance to significant Aboriginal cultural heritage*

The area outlined for this proposal has Aboriginal cultural heritage significance: 239 sites were recorded in the study area with 25 regarded as being of high local or regional significance (including an ochre quarry, grinding grooves and rock shelters); 144 sites have been identified at risk from mine impacts with 102 in the open cut area.

5. *Major Social impacts to the people of the local community*

Important European heritage, including the Catholic Church Cemetery, Upper Bylong Public School and a number of historic homesteads and farm buildings will be destroyed in the open cut areas of the proposal.

The social impacts on the Bylong community have already been devastating and impacts would equal or exceed that of a major natural disaster. With an overall feeling of loss and despair, anger, vulnerability and frustration have all been evident. When a community has been negatively impacted to this extent it greatly affects the capacity of the community to rebuild or have the capacity to sustain itself in the future.

6. *Failure of Biodiversity Offset Strategy to mitigate biodiversity impacts*

- 35 ha of Critically Endangered Ecological Community (CEEC), Box Gum Woodland and Derived Native Grasses, will be cleared for open cut and mine infrastructure and 672 ha fall within the underground subsidence area. The proposed offsets are misleading and will not mitigate these impacts.
- The proposed Area 5 offset is highly unacceptable because the majority of the area, ie 1,064 ha, is impacted by mine subsidence and is a State Forest. This area is proposed to contain the majority of the offset credits for cleared CEEC. This offsetting calculation is misleading because of the subsidence impacts.
- The assessment of Area 5 offset refers to an area discount in recognition of the subsidence impacts. However, this discount does not appear to be included in the calculations for species credits or the ecosystem credits.

- The proposed offsets will not meet the credit requirements for Box Gum Woodland derived Native Grasses. Table 5.10 in Appendix K demonstrates a shortfall of grassland component.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Marie Hensley".

Marie Hensley

Secretary

Mudgee District Environment Group

Thursday November 5, 2015