

SUBMISSION OBJECTING TO BYLONG COAL PROJECT: SSD 14_6367

Friday 6 November 2015

Thank you for the opportunity to comment on this project.

The proposed Open cut areas are located between two arms of Bylong River/Lee Creek encompassing a large swathe of fertile flats, surrounded and overhung by precipitous heavily faulted sandstone ridge lines of stunning beauty. This inspirational landscape is also habitat for a range of high conservation value fauna and flora.

The Bylong valley has future potential for a wide range of productive land uses limited only by imagination. All alternate land uses; be they agricultural, tourism, conservation or recreational can be conducted, economically and environmentally in ways that are sustainable. Also unlike coal mining, they are not mutually exclusive. Coal mining is the only land use that must push out all others. This mine will remove the water, the community and the biodiversity, effectively sterilizing the land for all future land uses.

As upstream landholders since the 1980s my family has witnessed the real legacy (as opposed to reassuring predictions) of open cut coal mining. Over the years there have been a number of 'unpredicted' high wall collapses at Ulan Coal Mine and earlier this year at the Moolarben Coal open cut. Resultant shockwaves in the 1990s were strong enough to be recorded as far away as Canberra. We have observed far field rock falls, cliff collapse, irreparable cracking of watercourses such as Ulan Creek and more recently lengthy closure of a public road following a high wall collapse.

The essential priorities for open cut mining are to minimise costs and maximise extraction. The likely consequence of any high wall collapse in the Bylong River valley, where the gloriously tumbled, soaring cliff faces are even higher, should be obvious to any unbiased person.

To anyone suffering a coal project near their home the blatant dual standards that taint our planning and assessment processes are highlighted by the recent rejection of Jupiter Wind Farm, 5 km southeast of Tarago NSW. The grounds for rejection of the proposed Wind Farm were that Jupiter had failed to properly consult with community, especially with the nearest neighbours, the claimed visual and noise/health impacts of up to 100 wind turbines deemed unacceptable for a rural area. Contrary to a long history of coal projects nearly always being approved these new planning requirements can stop a wind farm proposal despite the National Health and Medical Research Council finding "no consistent evidence" of damage to human health and that wind farms are safe (supported by a motion passed last week by the NSW State Upper House).

Given the sordid recent history of coal licenses in the Bylong area the questions raised here are especially pertinent. In NSW wind farm proposals are rejected on grounds of unverifiable health issues, claims that wind turbines are visually incompatible to the rural lifestyle and that the proponent should properly consult with the community until there is substantial agreement.

Compare this to predicted outcomes for Kepco's Bylong Coal Mine that includes:

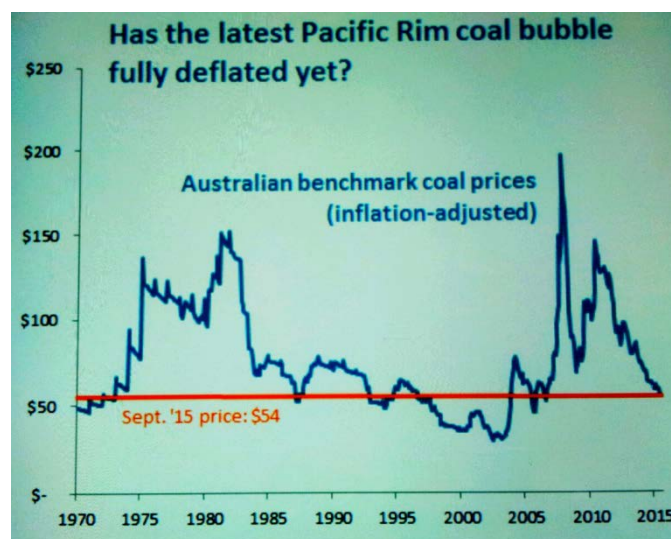
- Mine footprint of 2,875 ha with the destruction of 440 ha of Bioregional Significant Agricultural Land - 260 ha in the open cut
- Removal of a significant area of critically endangered Grassy Box Gum Woodland, habitat for 17 threatened birds and 7 threatened plants with deficient mitigation for loss of high biodiversity values.
- Long term impacts on groundwater and surface water involving the highly connected alluvial aquifer system within the stressed Bylong River catchment. Predicted peak losses of up to 295 million litres per year (ML/yr) with loss of base flows to the Bylong River of 918 ML/yr.
- Mine water-use that equates to over 75% of annual rainfall recharge (1,942 ML/yr) from a water resource that is already considerably over allocated. This means local farmers will lose critical water supplies during extended dry periods.
- The area has Aboriginal cultural heritage significance with 144 sites identified at risk from mine impacts (102 in the open cut area).
- 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.
- Devastating social impacts on the Bylong community and inadequate consultation of the remaining neighbours.

You have only to ask past and present residents of Ulan and the Moolarben valley what to expect regarding effects on rural lifestyle and real health effects of coal projects, this also is well established by copious evidence world-wide documenting the deleterious effects of coal mining.

All who are involved in the approval of this project are acting in full knowledge of the many deleterious effects from coal mining. This is in addition to the similarly well-established evidence this project along with its future incremental expansions and modifications (whereby open cut coal mining increases in scale and impact far beyond what was initially approved) will significantly contribute to catastrophic climate change, the cost of which looks likely to be greater than total value of the resource.

That there are unacceptable environmental and local community costs to a new coal mine in Bylong is clear. The argument that this project will provide new jobs and revenue for years into

the future to balance these costs is invalidated by modern market realities and basic economics. As indicated in the graph below which is derived from World Bank and US Department of Labor statistics, the persistent oversupply and weak demand in today's Asian coal markets means it is entirely plausible that Pacific Rim coal prices will continue to drop for years. US coal company, Cloud Peak Energy, recently paid an \$11 million penalty rather than continue exporting coal to Asia at a loss. In the words of Charles Patton, the President of Appalachian Power "you just can't go with new coal at this point in time. . it is just not economically feasible". Public statements by the CEO of Glencore also recently has confirmed basic economics, indicating that increasing supply of export coal will push coal prices even lower. This of course will be at the expense of existing jobs and royalties.



World Bank and US Department of Labor statistics

It is an illusion that it could be in the national interest to encourage our trading partners and competitors in Asia to increase burning cheaper and cheaper Australian coal at a time when the rest of the global community is trying to find ways to stop doing just that. It is reckless to act in the belief that the boom days of the early 2000s could repeat in time to rescue this project's viability when we all know that the circumstances fueling that earlier demand for coal will not come again. Approval of yet another coal project given here and now structural economic circumstances is an immoral gamble.

In all our best interests preserve this special place, leave the Bylong coal and associated groundwater in the ground.

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Ulan