



10/03/16

**Re: Comment on the Wilpinjong Mine Extension Project SSD 6764**

On behalf of the Mudgee Local Aboriginal Land Council we provide the following feedback for consideration regarding the Wilpinjong Mine Extension Project SSD 6764.

The overwhelming response from consultation with our community is that we do NOT support the project. We feel that it will have devastating impacts upon our culture and heritage – the effects of which will be intergenerational.

The following are some of the key points of concern which have been raised.

- Aboriginal sites have generally been classified as of low to medium significance – this is based on their scientific significance not their cultural values and doing so seems to justify the impacts of destroying these places. Yet the report states that 31% of sites affected are of cultural value and the impacts are to a broad area of 10km<sup>2</sup>. We consider the project area to be within a culturally significant landscape and the loss of Aboriginal sites caused by this development as being devastating to our culture and heritage.
- Despite the report stating that there is low potential for subsurface materials slate gully is a culturally significant valley. Artefacts are not the only thing that makes a site or area significant.
- No consideration given to the intangible sites of cultural significance or the whole landscape as a whole. The report is also assessing sites in relation to this project in isolation not as they relate to other sites or the cultural landscape or region as a whole.
- We have concerns regarding the Kayandel Site recordings (page 17) which are not on the AHIMS database – therefore any information from AHIMS doesn't give a true representation of sites in the development area as the official records are incomplete – we also have not seen these reports which leave a knowledge gap in relation to the project and surrounding area. Additionally we feel that there is no consistency with different archaeologists being engaged to carry out recordings across the project area. There needs to be more consistency with the archaeologists who work on site. From our experience it is evident that

some archaeologists do not have any understanding of the cultural landscape at Wilpinjong and its relationship to the wider landscape. Our cultural sites are not isolated units – they are connected and related in ways which mean that they cannot be examined in isolation. A lack of understanding of this affects an archaeologists methodology and ultimately the cultural heritage which is recorded and the interpretation of its significance.

- We believe that an independent rock art specialist should be engaged to assess the rock art sites that will be destroyed or potentially impacted by the development to give an expert opinion as to their significance, condition and potential impacts.
- Castle rock – we have concerns re vibration and dust impacts of not only the existing mine put the cumulative impacts if this project extension is approved. Again we consider that an independent rock art expert should be engaged to assess this site.
- Half of the sites recorded will be impacted or destroyed – there are already devastating effects from the current Wilpinjong mine other two mines in the area – let alone the impacts from this development. No consideration given to the cumulative impacts of this project in addition to the existing mines. The inter-generational impacts to Aboriginal people from the local community are devastating and irrevocable. Once these places are destroyed they are gone forever. No consideration has been given to the cultural integrity of the wider cultural landscape and the impacts of the loss of this element.
- We have major concerns regarding the removal of the buffer zone for the Munghorn gap which contains significant sites of cultural importance.
- Impacts from rerouting the transgrid line – more survey work needs to be done on the proposed altered transgrid route now – how can we fully assess the impacts on sites if we have not surveyed the proposed route and therefore do not have a true reading of what sites will be impacted upon.
- Impacts on future generations – they will never be able to visit cultural places and learn about their country and significance of the area as it will be destroyed.
- We have concern for the site known as Bird rock as discussed on Page 12 2.– re significance – it is recorded as being of low significance even though rock art was present. We have concerns that the scientific value has been used to make this evaluation – no consideration has been given to cultural values. Additionally other sites have complex cultural values which have not been considered when determining their significance – including: artefacts, art and shelter at WCP578 and WCP579 with artefacts – of high significance without local context (executive summary). A large artefact scatter – a large site was recorded with over 600+ artefacts and two axes in a concentrated area. This along with the other associated sites shows that the area was of high use and significance. Area G – rock formation on the valley floor of slate gully.
- The project adds only 7 years to the life of the mine – the loss of our culture and heritage is permanent.
- We believe that the request for the extension is premature – it is only 2016 and there is another 10 years and half of the potential coal reserve left – why is this extension needed?
- We feel that the company has overstated the number of jobs to be created by the project. We feel that the number of jobs created by the project cannot justify the need or benefit to community from the project.
- Low quality coal will be extracted – where is the demand to justify the impacts from the project.

- The price of coal is dropping and mines are closing therefore cannot understand the desire to start a project which will have such devastating impacts on Aboriginal culture and heritage. This is not a major project of state significance therefore how can the impact upon Aboriginal culture and heritage be justified.
- The development impacts on our ability to access cultural places between Wollar and Ulan due to road closures.
- We have serious concerns for the potentially serious impacts to groundwater, effects of salinity and erosion and impacts to bores within the catchment.
- We have concerns that the designated wildlife corridors approved as part of the original Wilpinjong mine will be impacted upon by the new project extension.
- We have concerns about potential impacts on threatened species identified within the project area.
- We support the noise concerns raised by residents and the impacts upon their quality of life.
- We have concerns about voids in relation to the safety of people and animals post mine operation.
- Ulan road – we support resident concerns re traffic on Cooyal-Wollar road – safety, hazards and ratepayers expense of maintaining the road.

Once again we would like to reiterate that we have major concerns about the effects upon our culture and heritage as a result of this project. We feel that this in addition to other major concerns regarding impacts to the community and environmental values and the questionable need and viability of this project should be given serious consideration.

If you have any further queries please do not hesitate to contact our office.

Regards

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Mudgee LALC