

1 September 2016

BY EMAIL

Director
Resource Assessments
Planning Services
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir

RE: WALLARAH 2 COAL PROJECT - SSD 4974
AMENDED DEVELOPMENT APPLICATION

We object to the above proposal as set out in our previous submission dated 18th June 2013 and for the following reasons in respect of the amended DA and EIS.

The original Environmental Impact Statement (EIS) for the Project was prepared in April 2013 by Wyong Areas Coal Joint Venture. In 2014, the Planning Assessment Commission (PAC) reviewed the Project and conducted a public hearing in Wyong. The PAC then prepared a Review Report, which made a number of recommendations and concluded as follows: "... the Commission considers that, if the recommendations, concerning improved strategies to avoid, mitigate or manage the predicted impacts of the project are adopted, then there is merit in allowing the project to proceed. However, if the recommendations are either not adopted, or adopted only in part, then the Commission's position would probably change in favour of the precautionary approach. This particularly applies to water-related impacts."

The majority of the PAC's principal findings and recommendations relate to subsidence and water-related impacts. In relation to water they said, "The project predicts risk of reduced availability of water for the Central Coast Water Supply" and wherein they (PAC) "recommended there should be no net impact on potential catchment yield". The Central Coast water catchment supply in the Wyong valleys is at real risk of destruction due to massive subsidence and loss of potable water to the mine area below.

None of the PAC's recommendations for improved strategies have been implemented.

The Proponent prepared a Response to the PAC Review Report and subsequently has prepared an amended development application (Amended DA) for the Project. According to the Proponent, the Amended DA involves changes to the proposed coal transportation infrastructure and the realignment of a sewer connection. All other aspects of the Project will remain as previously proposed. The Amended DA documents do not include amended Appendices in relation to subsidence, groundwater or surface water. The Amended DA does not propose to change the number, depth or location of the

longwalls. Therefore, our submission in relation to the Wallarah 2 Coal Project is made on the basis of the entire DA (copy of original submission attached), which includes both the Original DA and Amended DA documents. In general terms, our objections to the Project remain largely the same, with some exceptions, as set out in this document, which is an annexure to our original submission. We further object to the Amended DA on the grounds set out in this attached annexed document.

Coal Dust and Health

New data has shown the air quality across Australia has deteriorated to alarming levels, with the coal industry clearly the nation's worst polluter!

The most concerning rise in air pollution is from PM10, a coarse pollution particle about the width of a human hair. Nationally, total PM10 emissions have increased 69 per cent in one year, and 194 per cent in five years.

The figures come from the National Pollutant Inventory's 2014-15 report, which collects information about toxic pollution. Air pollution kills more than 3000 people in Australia every year, almost three times the annual road toll, and costs the nation more than \$24 billion in health care costs each year. The economic return from coal mining is no longer viable, and its high cost to human health - mortality and morbidity - is unacceptable.

Dust will be a real issue for health in the Blue Haven and Wyee precincts, despite partial coverage of infrastructure by the Wallarah 2 mine proponents. There is no attempt to cover coal wagons, which will travel through one of the largest growing residential settlements in NSW, and through the southern suburbs to Newcastle affecting all those communities long the route as has been demonstrated in the Hunter to Port line. There has been great concern about the mapping of coal dust and the lack of authorities to control those emissions.

Pm10 emissions from the site are conservative and do not take into account the changing nature of intense wind and storm events in the recent years. Blue Haven and Wyee townships are now as close as 200 and 400 metres from the conveyor belt respectively, and the nine-story coal loader is 300 metres from the new Darkinjung LALC housing subdivision, which will bring even far greater problems for families living in the area from both constant dust and noise 24 hours per days seven days a week. The northern area, of what was previously Wyong Shire, is designated for housing development under the current Regional Plan. The encompassed precinct has many schools, Preschools and retirement villages and hospital within 5 kilometres of the proposed coal conveyance, coal stockpiles and coal loading facility.

With the construction of new homes and the steady influx of large numbers of young families it is not appropriate for this type of development, which would have an adverse and long-term impact of human health. Dr. Peter Lewis, previous area director of public health had grave concerns in his previous two submissions of the increase in morbidity arising from airborne coal dust exposure. In particular the impact in younger children and the elderly with increased visits to the doctor! In his report to the PAC hearing on the Wallarah 2 coal project in April 2014 he said, "that there would be an alarming and unacceptable increase in health problems associated with coal dust particulate exposure for people living in the northern parts of Wyong Shire." That was when the coal loading facility was to be sited on the coal miner's land adjacent to Tooheys Road. By their own admission Wallarah 2, in the executive summary of their "Environmental Impact Statement" in April 2014,

stated that 1 in 100,000 people would die from coal dust particulate exposure. This problem would be exacerbated many times over sited so close to a suburban housing estate.

Wallerah 2 consultants, in Appendix C of their (pages 2 and 3) said: “Fugitive emissions can be expected during operation from loading stockpile to conveyor, wind erosion and maintenance of stockpiles and from up-cast ventilation shafts”.

Of all the air pollutants produced by coal mining activities, particulate matter is the most significant health threat. This threat would only be exacerbated by the transport of the coal to the loader by partially covered conveyor belts.

As a major component of outdoor air pollution, particulates, such as PM10, can trigger heart attacks and strokes. The World Health Organisation has deemed that coal dust particulate matter is carcinogenic! Fine particles travel deep into the lungs and pass into the blood stream, posing a risk of heart attack and stroke. There is no threshold below which particle exposure is not harmful to human health. (Dr. James Whelan, Environmental Justice Australia).

Noise

Noise levels as admitted by the proponent for “residences to the north of Bushells Ridge Road at Wyee” will cause severe health problems. With the conveyance, coal loading and train movements now within hundreds of metres of existing suburbs the extent of that general noise 24 hours per day, seven days a week, for those living in Blue Haven and Wyee areas would become unbearable. Insomnia, stress related illness and depression will become a debilitating problem for people living next door and in the surrounding suburbs.

Summary

The mine proponent, Wyong Coal Pty Ltd, who trade as Wyong Areas Coal Joint Venture, hold the exploration lease for the Wallarah 2 Coal Product and the same proponent would likewise hold any licence to mine. It should also be noted that the major shareholder (82.25%) is Kores Australia Pty Ltd, a wholly owned subsidiary of South Korean Government-owned Korea Resources Corporation.

The Korean Times published in June 2016 that the project’s parent company, South Korean Government-owned Korean Resource Corporation (KORES), will quit its overseas resources development operations. KORES became actively engaged in overseas resources development during the former President Lee Myung-bak administration, but a price plunge for global resources has dealt it a deathly blow. KORES’s debt ratio stands at a staggering 6,905%. According to the Korean Board of Audit and Inspection, a total of 35.8 trillion won was invested in overseas resources development, with little gains so far.

This is a major strategic shift by the South Korean Government and puts in doubt the ability of the proponents of the Wyong Coal Project to sufficiently carry out any remedial work or rehabilitation, in particular in the water catchment area where a high degree of subsidence is forecast.

This problem of remedial work and rehabilitation could well be unrealized because the proponents, Wyong Coal Pty Ltd, only have a paid-up capital of \$400. Therefore, the total liability of this company is limited to the total amount of its paid-up capital. They could simply walk away and leave the Central Coast community and the State Government having to bear the burden of cost.

The Central Coast, in particular the northern region, is the fastest growing residential development

area in NSW. Alongside this is the continual growth of tourism to the area, and is without doubt a major contributor to ongoing and increased employment.

On the 9th December 2015, then Wyong Council received a Director's Report updating Tourism in the Shire.

"Tourism is big business on the Central Coast and according to the National Visitors Survey produced by Tourism Research Australia, since 2012, Central Coast visitations have seen a four-year trend increase of 30.58% in total visitor expenditure."

"Wyong Shire Council (WSC) recognises that tourism is an opportunity for the Central Coast, through the creation and support of jobs, the economic benefit it brings to local businesses and the destinations and attractions that it delivers for all residents."

Clearly, the building trades (new residential homes) and the tourism industries have traditionally been the largest employers on the Central Coast for decades. Despite the spurious claims of the highly mechanised mining industry, they will never match either of those industries in job growth, in particular young people in apprenticeships, nor make a significant financial contribution when compared to the loss of tourist dollars. The long-term devastation of this project impacts directly on housing and tourism.

Injurious and debilitating health problems, loss of the fresh water catchment, subsidence of a grand scale and contamination of waterways will have a degrading effect of people's lives and the environment.

Loss of the water catchment will not only impact on Central Coast residents but just as severely on industry and the growth of new industry. Water is essential for the survival of the Central Coast and in driving the Region's economy. Likewise, loss of air quality through airborne coal dust particulates not only creates an unhealthy future for residents, but will also cause a decline in population expansion and the construction of new homes. The underlying theme being voiced by many people and visitors in respect of the northern region of the Central Coast is "who would want to come here and buy a home and live in Coal Dust Central".

The Central Coast Council, the State Members for Wyong, The Entrance, Gosford, Swansea and Lake Macquarie, along with the Federal Member for Dobell, all vehemently oppose this destructive development. It has no real benefit to the Region when balanced against what will be lost.

This Amendment should be rejected and the whole project extinguished due to the many areas of risk associated with constructing a coalmine in a declared water catchment district and the handling and loading of coal within a growing residential settlement area.

Yours faithfully

Alan Hayes OAM

Judith Hayes

18 June 2013

Director Mining Projects
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir

**OBJECTION TO PROPOSED WALLARAH 2 COAL PROJECT
APPLICATION NO.: SSD - 4974**

We object to the Wallarah 2 Coal Project on the following basis:

The Dooralong and Yarramalong Valleys is the largest drinking water resource for the entire Central Coast population, more than 300,000 people, and account for approximately 53% of the drinking water supply, which is drawn from the streams and aquifers. The various streams, creeks and rivers within the water catchment are primarily fed from the underground aquifers, providing approximately 68% of the water to these streams. We are concerned that after fully reading the Wallarah 2 EIS that the proposed mine will have an unacceptable impact on the drinking water catchment.

A report on Jilliby Jilliby Creek, prepared in 2004 by River Care, in association with Hunter-Central Rivers Catchment Management Authority, National Heritage Trust and the Department of Infrastructure, Planning and Natural Resources, declared this water system as one of the most pristine in New South Wales. This report also raises concern of the potential damage that may be caused by longwall coal mining directly beneath the creek system and within the catchment area.

We are concerned that coal extraction from beneath the water catchment valleys will have enormous environmental, health, economic and social impacts on the Central Coast. In particular the problem of ground subsidence impacting on the water supply and the habitat of many endangered species of fauna of national significance, flora and fauna that are listed as threatened and endangered and the impact, airborne coal dust particles emanating from the coal loading facility and rail transport will have on human health.

We are also concerned about the problems associated with coal dust (respiratory and skin disease) being transported on the wind. In particular mortality from fine airborne coal dust emissions as clearly in the Wallarah 2 Executive Summary (page xi) and Appendix M, pages 6 - 17 of the Health Assessment Risks.

There are a number of international waders, recorded under the Australian Government agreements with China, Japan and South Korea, whose fragile habitat is entirely dependent upon the health of the water catchment river systems, and thirty-three (33) State endangered or

threatened species of flora and fauna within the catchment valleys. Concern is raised at the threat posed to the habitat of the various endangered and threatened species of flora and fauna.

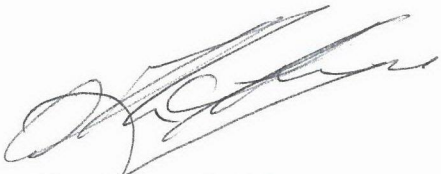
We are also concerned that Kores' Environmental Impact Statement (2013) of the Wallarah 2 Coal Project is only a re submission of their previous submission, dealing with some of the matters in a different way but still providing the same conclusions as previously.

Walarah 2 have not obtained a social licence (acceptance from the community) and have failed to adequately address community concerns or consult with them. In particular there has been a total failure by the proponent to engage in a one-on-one discussion programme with landowners within the mine footprint. Distributed newsletters have done no more than promote Wallarah 2 propaganda, lulling landowners into a false sense of security that there will be no impact upon there properties.

The previous Minister for Planning Tony Kelly rejected the Wallarah 2 mine proposal because of too many uncertainties. He confirmed in a letter on the 21st March 2011, "the project is not considered consistent with the principles of ecologically sustainable development, including the precautionary principle, and as a consequence is not considered to be in the public interest."

We believe that the proposed Wallarah 2 mine is still not in the public interest and should be rejected.

Yours faithfully



Alan Hayes OAM



Judith Hayes