



Hunter Environment Lobby Inc.

PO Box 188
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12th October 2016

To

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

Rocky Hill Coal Project – Application No SSD-5156

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5156

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has been appointed by the NSW Government over the years to represent regional environmental concerns on diverse committees such as the Hunter River Management Committee, the Hunter and Paterson Rivers Environmental Water Advisory Group (EWAG), and the Upper Hunter Air Quality Management Group.

We have made submissions on most large developments in the Hunter, ranging from coal mining, unsustainable water harvesting and large scale residential developments. On 28/10/13 we submitted an objection to this development to your department and were gratified when the project was seen to be on hold.

Community Concerns

The reasons for our anxiety concerning this mine are the very same as those held by the communities surrounding this proposal. They have seen ten years of uncertainty as they see that GRL have held their futures in limbo about the way forward for the project.

They still do not know if there will be a mine even if the approval process favours it. People's lives have been interfered with in an unsatisfactory way, their land values and any chance of selling is up in the air, and community division conquers community stability in these unsettling times.

The issue of Foreign ownership means that profits go back to parent companies overseas, and GRL is 81% foreign owned. The local community find that another reason not to be loyal to this project.

Because Gloucester is one of the most closely settled areas to propose an open cut coal mine, the community is very anxious indeed about the effects on their lives, health and well being and the sustainability of agriculture in the surrounding farmlands.

Nearly 300 people live within 3km. 2000 people live within 5km. 3500 people live within 7km. of the proposed coal mine. The community of Gloucester has grown up around agriculture and timber getting, and they have found niche markets for good quality agricultural produce, and tourism is based around the new 'Clean Green' image that is continuing to be heavily promoted.

Air Pollution

The enclosed valley retards dispersion of air pollution. Air pollution is the largest single environmental health risk and a leading cause of disease and death globally affecting the respiratory and cardiovascular systems.

HEL has alerted your department on all occasions in our submissions against yet another coal mine in the Hunter Valley that the health effects are not acceptable. We would like to see action on this important issue in this catchment area before it is too late for many more diseases to affect an even greater proportion of our communities.

Mining including blasting creates both particulates and gases, which impair our health in many ways. There is no evidence of a minimum threshold for particulates where adverse effects don't occur.

Livestock

It is known the endocrine disrupting chemicals of the CSG industry cause a range of problems for cattle in addition to the carcinogens, heavy metals and organic compounds in coal mining. Some of which are carcinogenic and neurotoxic and they stay on the soil surface. There is no routine testing regime for mining pollutants in milk and beef originating from cattle properties anywhere in mining areas.

Noise

Noise is responsible for both auditory and non-auditory health damage. The National Noise Inventory measures high frequency noise, which is auditory - but not low frequency noise, which is non-auditory. The noise from mining machinery is mainly low-frequency and causes stress and cognitive impairment. This will not be measured.

Health

We believe that the EIS uses the incorrect measurement of 1.5 people per square kilometre for health impact financial assessment. The correct figure is 50 people per square kilometre.

Blasting is a major cause of air pollution as well as structural damage to brick houses from vibrations and flyrock causes housing damage. Excessive noise impedes hearing and communication and exacerbates tinnitus. Blasting also causes anxiety.

Hours of Operation

We do not believe that there is any guarantee that the hours of operation will not increase to 24 hours after the initial three years. We have seen that happen on many other projects.

Water

The Rocky Hill mine is proposing to discharge run-off from areas disturbed by mining activities to the local waterways. There will be approx. 32,800 tonnes of soil-contaminating salts and heavy metals trucked from the site during the life of the project. This is an unsustainable practice that must not be accepted by this government department.

This polluted runoff will pollute environmental areas downstream – biodiversity will be impacted on, the natural ecological services of fresh water and clean air production will be negatively impacted on.

Groundwater seepage and surface runoff from this project will be more saline than the pre-mine situation. This aquifer interference will not be recorded against the total mine use of water, which results in the proponent not having to record all the water they use. This practice happens in many other mines, and does not make a fair contribution to water sharing in the community.

The water treatment plant will discharge water to areas outside the mine site and to the Avon River under some circumstances, this again is not a sustainable practice.

Climate Change

HEL feels that it is irresponsible for NSW Govt to continue to expand the coal industry in light of the Paris Agreement and the environmental, social and economic costs of climate change that are already being felt across the state, country and the globe.

Further, we feel that the Department of Planning and Environment once again has the opportunity to demonstrate leadership towards reducing NSW production and export of greenhouse gas sources by refusing approval of this proposal.

HEL considers that extended production of thermal coal is irresponsible, climate change mitigation is increasingly becoming impossible. Issues of expansion of fossil fuel extraction whilst witnessing environmental devastation of globally important life forms, as are the Great Barrier Reef coral systems, is not the responsible way to operate our state's business.

Overburden waste and final voids

There will be 8 million tonnes of coal crusher waste spread throughout the overburden at Gloucester and Stratford to leach into the catchment. This is unacceptable. HEL has maintained on all previous submissions to your department that any final voids left after mining has completed is totally unacceptable- both to the environment and to the community.

Final voids ensure much more saline and heavy metal infused water will eventually spill into the local environment, causing damage not able to be mitigated. For all the reasons above, HEL calls for the rejection of this project.

Yours sincerely

A handwritten signature in cursive script that reads "Jan Davis". The signature is written in dark ink on a white background.

Jan Davis
President