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Reply to:

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Submission: Rocky Hill Coal Project – Amended EIS (SSD-5156)

Compared to every other open cut coal mine project we have seen in NSW, proponents of the Rocky Hill project have gone to significant lengths to minimise the impacts of this project on the surrounding community. Residents of the Hunter Valley and even elsewhere in the Gloucester Valley would be thrilled if the coal mines next door to them had to shut down overnight, or were planning to backfill their final voids and largely restore the original topography, as proposed at Rocky Hill.

The problem is that concessions like these are borne out of the fundamental realisation that open-cut mining is a high social impact activity, and that the open cut mine in question happens to practically overlap a major rural population centre: Gloucester. This problem is insurmountable, and the project must be rejected due to the unacceptable impacts it would have on the local community and the local tourism industry.

Health impacts

The proposed open cut mine is less than 5km from Gloucester Hospital, Hillcrest Aged Care Facility, Gloucester High School, and the Captain Cook Park playing fields. All of these facilities and the sensitive “receptors” (people) that use them can be expected to experience greater levels of noise and air pollution as a result of the Rocky Hill project, as in fact can every resident of Gloucester. Increased air pollution in particular – specifically the PM10 and PM2.5 particle pollution associated with open cut coal mines – is known to increase illness and mortality among local populations. This increase is, of course, proportional to the increase in pollution, but *any* increase in pollution with these particulates causes an increase in sickness and death in the local population.

In its submission to the original EIS, NSW Government agency *Hunter New England Population Health* raised doubts about the proponent’s promise to achieve 90% suppression of dust from the mine’s haul roads. The submission’s author, Dr Craig Dalton, called this a “theoretical” assumption and cited a NSW EPA commissioned report (“the Katestone report¹”) on world’s best practice dust suppression which found real-world maximum efficiencies range between 50-70%. Dr Dalton generously suggested that the proponent should assume haul road dust suppression efficiency of 75% or 80% to provide a more “plausible” estimate of the actual PM10 emissions from the mine.

In its Response to Submissions the proponent disregards this advice and again restates the theory behind the 90% dust suppression goal. In the latest Amended EIS, the matter is not mentioned. It is unclear to us from the documentation whether this dubious methodology has now been dropped,

¹ Katestone Environmental (June 2011), *NSW Coal Mining Benchmarking Study: International Best Practice Measures to Prevent and/or Minimise Emissions of Particulate Matter from Coal Mining*

and a more realistic approach taken in the modelling of particulate emissions. Nevertheless, we submit that the estimates for PM10 emissions in particular are unreliable and almost certainly underestimated.

Impacts on the tourism industry

Gloucester is home to a thriving nature-based tourism industry that brings over \$50 million to the local economy each year². This tourism industry is founded on Gloucester's spectacular scenery, attractive and quiet rural ambience, and proximity to the Barrington Tops National Park. That there are already two open cut coal mines in the Gloucester Valley does not indicate that the town's tourism industry can coexist with mining, as the two existing mines are much further from town than the Rocky Hill proposal, which could not be much closer to town without being inside it.

Rocky Hill is simply too close to Gloucester, and it's a certainty that the mine would negatively impact on the quiet rural ambience that is the foundation of the local tourism industry. It is unacceptable to allow the mine project – which promises a peak of 110 jobs over a period of less than two decades – to threaten the local tourism industry which employs twice as many people³ in a permanent industry with long-term growth potential.

Other comments

It is a rare treat to see a proposed final landform for an open cut coal mine in NSW that shows no final voids, and in fact shows a final landform topography similar to the existing landform. For decades, the government has defied communities and even its own PAC recommendations, and handed out coal-mine approvals that failed to make companies fill in their pits, instead leaving vast lakes of Dead Sea-esque water quality, affecting local aquifers for centuries. Disappointingly, it's through the face-saving concessions of a coal mine proponent – and not decisive government policy or regulation – that the residents of NSW now learn that it is in fact possible to dig a coal mine in this state and fill in your hole afterwards.

The impacts described above relate to the development application as it stands: the Rocky Hill Coal Project that has been placed on public exhibition. This project must be rejected, despite the concessions and ameliorations being proposed by the mining company in order to reduce its impacts on the local area. It is important to note, however, that there is a well-founded scepticism in the community that the project as described would be the project that is ultimately built, or the impacts described would resemble those actually experienced by local people.

Experience with other coal mine projects in the Hunter Valley and elsewhere in NSW is that the actual noise and pollution impacts from the operating mine exceed those that were modelled by the proponent when seeking approval. Also, approval conditions are never final. Companies continually seek, and are granted modifications to their initial approvals, including modifying operating hours, mining rates, the mine area footprint, and the life of the mine itself. In reality, the final mining project usually bears little resemblance to the original project approved.

The residents of Gloucester have little reason to believe that the Rocky Hill project for which approval is sought will resemble the project that is built, should it be granted. Will the proponent apply to operate for 24 hours a day in response to a coking coal market rally? Will they seek to modify the approved final landform, and leave a final void or two, in response to a market slump? Will they apply for a Rocky Hill Stage 2, and bring the mine even closer to Gloucester? This seems likely, especially considering the Exploration Licence under the project extends for another 2km north of the proposed mining area, along the eastern edge of town.

² Destination NSW Gloucester LGA Profile [<http://visitgloucester.com.au/wp-content/uploads/2015/09/Gloucester-LGA-profile-Sep2014.pdf>]. Four year annual average to September 2014 is \$51 million.

³ Employment survey by Gloucester Visitor Information Centre, Oct 2012 [<http://visitgloucester.com.au/2015/03/the-value-of-tourism/>]

If and when such modifications to the project are sought, it seems inevitable that they would be approved, with authorities citing the already existing impacts of the mine on the town, and the status quo seen in other mine approval conditions in NSW, which are allowed to operate at all hours, and are not required to backfill voids.

There is a real risk that this mine will be approved based on restrictions and concessions that will not be maintained. In any case, it should not be approved at all, based on its unacceptable proximity to Gloucester and the impacts it would have on local residents and the local tourism industry.