

**Submission in Objection**

to the

**Amended Rocky Hill Coal Project**

and the

**Stratford Mining Complex SEE**

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**October 2016**

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12<sup>th</sup> October 2016



# **Contents**

## **Introduction**

**The EIS Concept in Review**

## **Primary Grounds for Objection**

**Need for Another Mine ?  
The Gloucester Community**

## **Social and Economic Issues**

**Overview  
Defining the Locality  
Demographic Profile  
Social Infrastructure  
Community Viewpoints  
Household Survey  
Individuals and Groups  
Local Expenditure**

## **Selected Topics**

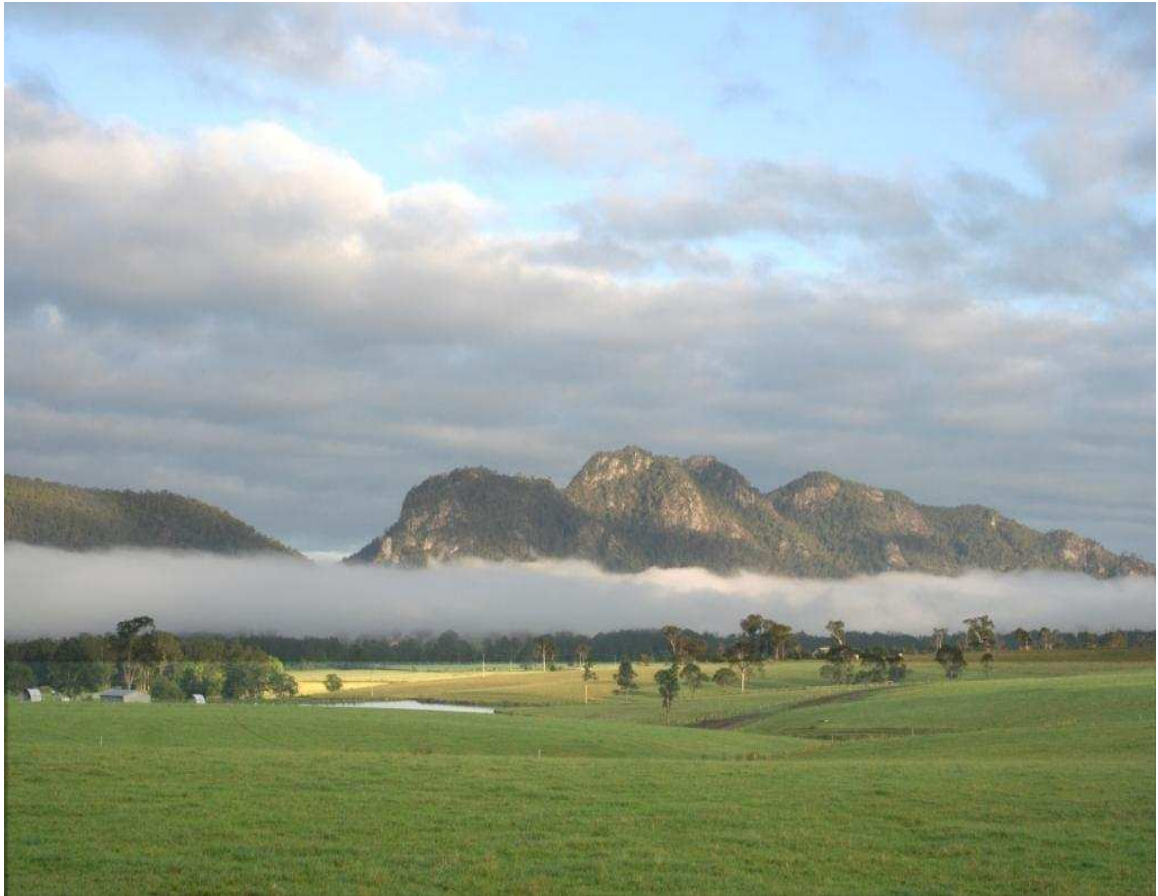
**The Haulage Road  
Local Benefactors ?  
Market Uncertainty  
Rehabilitation  
Mine and Privately Owned Residences  
Dairy Farming**

## **Is GRL a Suitable Applicant ?**

## **The EIS Conclusions**

**The Vanishing Young  
Dependency Ratio  
Wrap Up**

**Thanks is due to Gloucester photographer Linda Benson for the illustration on the following page.**



**Morning on the Bucketts at Gloucester**

***"What is hateful to thee, thou shalt not do unto thy neighbour. This is the whole of the Law, the rest is only commentary".***

***Rabbi Hillel***

# Introduction

This is an individual response to the invitation to comment on the Amended Rocky Hill Coal Project Environmental Impact Assessment (SSD 5156), and the associated Statement of Environmental Effects relating to the Stratford Mining Complex, both of which were placed on Public Exhibition on the 19<sup>th</sup> of August 2016.

The Rocky Hill EIS is, to put it mildly, a rather bulky, and often repetitive, document. Despite the extended response period of eight weeks, it would still be difficult for a critic, however talented, to absorb and digest the content, cross-check for internal consistency and rationality, follow up on and evaluate the numerous external references, and prepare a comprehensive response, all within the timeframe allowed.

It is noted that the Proponent had available to it all of the time required to prepare a weighty document in support of its project, and will again have all the time it needs to respond to criticisms. These facts but confirm the preferential bias which the NSW Government displays towards any and every coal mining proposal.

Since the economic structure of rural service centres has been one of the writer's major research interests, the present submission concentrates to some extent on these aspects of the EIS. However, other selected issues are also considered, as are some more general contextual concerns, the first of which is covered in the following section.

## The EIS Concept in Review

The preparation and submission of Environmental Impact Statements for resource extraction proposals, and their exhibition for public comment, has degenerated into a charade in NSW. Over the past two decades such reports have grown ever more lengthy and detailed, and have, arguably, moved far from the intentions of the 1979 Planning Act.

The object is no longer to inform the community by providing them with an unbiased presentation of the issues involved, but instead to obfuscate, confuse, and mislead; to direct attention away from inconvenient topics; and to present a fabricated rosy future with appeal to the more gullible members of the affected community.

Thus, in response to the needs of proponents, there has evolved a lucrative consultancy industry populated by people who, though often well qualified academically, are still prepared to prostitute their education and talents in support of any well funded project, regardless of the broader social and economic consequences; the implications for general societal wellbeing; and the implicit duty of care which should attend all professionals.

**There is an urgent need for the NSW Government to establish strict standards for readability, relevance, accuracy, veracity, and verifiability for all documents of this kind offered for public comment.**

# Primary Grounds for Objection

There are two preeminent, **and fully sufficient**, reasons for rejecting the Rocky Hill Coal Mine Proposal, namely that:

- (1) It is not needed; and
- (2) It poses an existential threat to the Gloucester community.

## Need for Another Mine ?

It is quite evident that, even if consideration is confined to coking coal, there are ample alternative supply sources to meet expected global demand, without Rocky Hill being needed. And even if some supply or cost constraints could be demonstrated, it would still not be appropriate for the NSW Government to give priority to overseas interests over the welfare of its own people.

**What remains then is the NSW Government's obdurate obsession with promoting coal mining, and a prospect of personal gain as perceived by a consortium of speculative private investors, with an 82% foreign ownership.**

## The Gloucester Community

The town of Gloucester is set in an area of outstanding scenic beauty, including the World Heritage Barrington Tops. The population of the town and its prosperous rural service area totals about 6,000, of whom approximately half live in the town. The district also enfolds the principal headwaters of the Manning River which supplies domestic water to a population of more than 70,000.

**Gloucester has a demonstrable capacity to provide an idyllic lifestyle for a slowly growing population, with a sustainable economy based on agriculture, light industry, tourism, and retirement.**

The damage which coal mining may have done over the past twenty years cannot be measured, but there is a prospect that Yancoal's operations may now be phasing out. This, together with the removal of AGL's Coal Seam Gasfield threat, offers hope for a gradual recovery for the Valley's Community.

But a new mine, situated a mere kilometre from some residential areas, and with a prospective life of more than twenty years, would pose not only a threat to the health and wellbeing of the people, but the certainty of social disruption and economic stagnation for the Gloucester Community.

**The Gloucester Community is not facing either an economic nor a demographic crisis, and even if it were there are solutions other than another coal mine.**

# Social and Economic Issues

## Overview

Part 14 of the Specialist Consultant Studies deals with the social, economic, and demographic issues arising from the Proposal insofar as they affect the Gloucester Community. This contribution, totalling 280 pages in length, which was prepared by the Newcastle based firm Key Insights Pty Ltd, builds on their previous work for the 2013 EIS.

Part 15 of the SCS, prepared by Deloitte Access Economics, deals mainly with economic issues at the macro scale, but does also introduce themes at the regional level. However, while quantifying in detail the alleged benefits flowing to the entrepreneurs and to government, virtually all of the external costs which would be borne by the community are treated qualitatively only, and generally undervalued, or trivialised and dismissed

## Defining the Locality

Clearly, in order to estimate the effects of a proposed development on the surrounding district one must have a sound and realistic operational definition of the spatial extent of the relevant local economy. This has been identified by the present writer as the town of Gloucester and its service area, which is closely approximated by Post Code Area 2422.<sup>1</sup>

Key Insight's choice of reference area for presentation of statistics is the (former) Gloucester Shire or LGA. Although smaller than the PCA, within which it is completely contained, this is an acceptable choice for practical reasons, since a broader range of data is available at the LGA level.

In their 2014 report "*Cost Benefit Analysis and Economic Impact Analysis of the Rocky Hill Coal Project*", Deloitte Access Economics also employed the (then) Gloucester LGA as their local reference area.

However, in their Part 15 contribution to the current EIS they have opted for a much more extensive area, namely a combination of (the former) Gloucester and Taree LGAs, referred to as "**... communities located near the amended Project Area.**" This is puzzling, as in the case of the latter LGA the main urban centre, Taree, is 78 kms distant from the proposed mine site, and some other communities are even more remote.

**Yet Deloitte consistently refer to potential workers living in this extended area as being "Ordinarily resident in locality" (Table 5.3; p 15-59), a descriptor which could mislead local business owners into viewing them as potential customers. Use of this extended area also renders meaningless the "target" of 75% local employment as proclaimed elsewhere in the EIS.**

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<sup>1</sup> McCalden G: "*The Way We Could Be*"; Craven, 2015. ISBN 978 0 9803837 1 3



## Demographic Profile

The first substantive section (3.2) of the Part 14 report presents a demographic summary of the LGA, supplemented by data on crime, housing, income, and health. It is not always evident that these details are relevant to the broad question of whether or not an open cut coal mine should be opened close to the town, however, apart from the padding effect, there are no serious grounds for objection to their inclusion.

Broadly speaking, Gloucester presents as just another rural service centre, though with individual characteristics which differentiate it from other NSW towns of similar size which are located further inland, and remote from the major coastal urban centres.

The fact that Gloucester has a relatively high proportion of its population in older age groups is noted here, but the fanciful implications of this are withheld for the ominous **“Consequences of not proceeding with amended project”** which are presented at the end of the EIS.



**Another 3,000 reasons for opposing Rocky Hill (which would be just to the left)**

Comparisons are also made between the 2006 and 2011 Census figures on employment in the standard Industry Groupings, and more recent estimates, but little of relevance emerges. The authors might have noted the steep decline in employment in the Primary Industries Sector <sup>2</sup> from 366 in 2006 to 306 in 2011, and considered to what extent this might reflect the acquisition of family farming properties during that period by both GRL and other resource extraction enterprises. But this possibility was not explored.

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<sup>2</sup> Agriculture, Forestry, and Fishing

## **Social Infrastructure**

Section 3.3 provides a (mercifully brief) five page overview of a diverse range of community facilities, ranging from Police, through Churches and Service Clubs, Community Groups, and the Gloucester Shire Library. The latter, we are informed, provides, inter alia “Children’s programmes, including story time, Library, and school visits”, while the previous category includes a “Ladies’ Craft Connection” and an “Australia Day Committee”, among many others.

So, fine ! What is being profiled is a community which, while sharing a broad range of attributes with numerous other Australian Communities, can still claim elements of a unique identity. No argument with that. A lot of folk have selected Gloucester as an ideal retirement destination, and would like to keep it that way.

An obvious conclusion then might be that the Gloucester Community is already doing quite well, despite recent disruptions, and, if left alone, could continue to evolve along a sustainable eco-friendly track, providing a pleasant and sustainable lifestyle for farm operators, light industry businesses, retirees, and their supporting service providers.

But it seems that the sub-text which is being pushed here is that Gloucester is such a diverse, strong, socially enriched, and resilient community, that it could easily host a new open cut coal mine, and accommodate the prospective influx of mine workers who would be eager to relocate their families close to a job which promised a 20 year employment security.

The reality is that, because of its distance from the two higher order service centres of Newcastle and Taree, and the demand generated by a substantial agricultural industry, and more recently through an influx of retirees and tourists, Gloucester has evolved as a substantial service centre, offering a range of goods and services that is fully adequate to meet the community’s everyday needs. While an incremental increase in the present population would be desirable, another boom-bust scenario is not an option to consider.

## **Community Viewpoints**

In Section 4, titled “*Community Research*”, Key Insights present the outcomes from a programme of research into community attitudes and values. This consisted of two main strands, namely a questionnaire survey of households, and a series of broad-ranging discussions with individuals and community groups, some targeted and others self selected. Both of these date from 2013, but in 2016 individuals and community groups were offered an opportunity to update their viewpoints if they wished.

While still delivering conclusions favourable to the Proponent, Key Insight’s presentation is characterised by a degree of frankness which most other Specialist Consultants might have done well to emulate.

On the other hand here is a tendency to repetition, and careful editing could have resulted in a much shorter and more readable document, which still covered all of the relevant content. For example, the 15 page Executive Summary includes in full detail an 8 page list of recommendations, which is repeated identically further on in the report.

Thus while Key Insights has identified and listed the various reasons advanced for opposing or supporting the Rocky Hill Proposal, they have failed to identify an important discriminant between the two broad groups in the community. This is that those who oppose any new mines are focussing on the long term sustainability of Gloucester's social, economic, and environmental attributes, while those who are supportive tend to be focussed primarily on short term gains.

The opponents are not unaware of the benefits which could flow to local sectors such as accommodation, food, retail, and some service providers, in the event that the project were to proceed. But they are also alert to the volatility of the global coal market, and appreciate that the damage to the community fabric resulting from another boom-bust episode would take a long time to repair, and that the long-term costs to the losers would outweigh the short-term benefits to the winners, even though the former are less visible.

## **Household Survey**

The questionnaire was delivered to 2,300 households, and 150 Post Office Boxes. For some reason, which is unexplained, this covered only 88% of households in the Shire, and a further 43 questionnaires were subsequently delivered to households which had been overlooked. (See p 14-68). In the event, a response rate of only 20% was achieved, which is surprisingly low considering the high visibility of the Proposal in the community.

As the authors correctly point out, this survey did not deliver a random sample, as there is a strong possibility of self-selection bias. However, sifting through the detail, and in particular the responses to open questions, the outcome was consistent with other surveys which have generally indicated an 80% level of community opposition to the Rocky Hill Mine Proposal.

## **Individuals and Groups**

Interviews with individuals and groups encompassed a broad range of viewpoints. There is no evidence of bias in the overall composition of the group, and all points of view across the spectrum are included. Nevertheless, while grounds of objection are cited they are presented as "concerns" only, and not as realistic arguments against the mine. In contrast, favourable viewpoints are accepted at face value, and construed as evidence of substantive community support. A synopsis of the interviews and discussions is provided in the main report, while detailed notes/transcripts are provided in the Appendices.

## **Local Expenditure**

It is repeatedly claimed that the Project would result in \$48M out of a total of \$63M in annual operational expenditure being made locally – presumably in Gloucester town, but no further details are provided. It would have been reasonable to expect some examples of the types and quantities of goods and services which would be purchased locally, and a statement as to which business sectors would be the potential suppliers.

**So, this must be viewed as yet another fabrication, of the kind which is used frequently by resource extraction proponents, in the secure knowledge that they will never be able to be taken to account subsequently for their failure to deliver.**

For example, on page 2-59 of the EIS details are given of the proposed arrangements for diesel fuel storage, where it is revealed that at full operation there will be a daily diesel usage of the order of 34,000 litres, or the equivalent of about eight 25Kl tankers per week (give or take a bit). Would the Proponent have us, and the Gloucester business community, believe that this volume of fuel will be ordered and delivered through the agency of a local fuel service station ?

In general, it is absurd to suggest that local businesses which have evolved to supply goods and services to a small, and mainly farming, community would be capable of meeting any significant part of the sophisticated requirements of a modern open-cut coal mine, let alone as much as 76% of the overall requirement.

**The claim that \$48M of annual equipment and supplies purchases would (or could) be made locally transcends the bounds of reality, and amounts to what in plain language is termed a deliberate falsehood**

# Selected Topics

## The Haulage Road

There are numerous references to a “Private Haulage Road” in the EIS and elsewhere, and sometimes this is described as being sealed. Closer reading of the GRL EIS and the Stratford SEE reveals that it is proposed to transport coal from the Rocky Hill mine site, firstly via a newly constructed 4.4 km sealed road to the boundary of the Stratford Mine Complex (SMC), and subsequently by a further 4.9 km of either existing or to be constructed unsealed roads to the coal processing plant.

The haul road would enter the SMC at a point which is 4 kms from Stratford Village, but for half of its length would be within a radius of 2 kms from the Village, and the coal handling site is also within that radius. The proposal thus involves a prolongation of noise and dust exposure for Stratford residents, with the dust component exacerbated due to failure to seal the roads within the Yancoal site.

The EIS also mentions a crossing of Wenham Cox Rd, which is a public road, at a point within the SMC. This is treated in more detail in the Stratford SEE, where it is also revealed that it is proposed to give traffic on the private haul road priority over traffic on the public Wenham Cox Rd. This would be an unacceptable privilege to confer on a private company.

Should approval of this project ever be contemplated, then I request that:

- (1) Traffic on Wenham Cox Rd be given priority over coal trucks; and**
- (2) The entire length of the haul road be sealed to a satisfactory standard.**

## Local Benefactors ?

***“The Applicant’s objectives in developing and operating the amended Project are to: . . . provide a stimulus to the Gloucester and district economies through employment opportunities and the purchase of goods and services required for the development and operation of the amended Project; “ (ES p. 3)***

It is quite implausible, in fact ludicrous, to claim that the two majority shareholders of GRL have selected a small rural town in another country to be the beneficiary of their munificence. The ambit claims re employment and local spending are dealt with in other sections, but the above quotation from the Executive Summary clearly indicates that the authors of the EIS held the potential readership in contempt.

## Market Uncertainty

At no point throughout the Proponent's case is there any suggestion that their forecasts of future mine employment might be subject to a degree of uncertainty. Yet local experience over the past two decades in Gloucester clearly indicates otherwise.

For example, a few kilometres down the Valley Yancoal closed down operations at Stratford in 2014, with no evident indication of restarting, and has just laid off 40 workers at their Duralie operation. Yet the proponents of the Rocky Hill Project would have us accept an assurance of 97 full time jobs for a 21 year period.

This leads naturally to a concern about the consequences for Gloucester should the project be approved, only to face a collapse of the coking coal market a few years down the track. In addition to the boom-bust outfall, there would again be the question of rehabilitation.

## Rehabilitation

***“ Unfortunately, mine rehabilitation was not always a consideration during historic mining operations. ”*** (Copied from NSW Resources & Energy website; Sept. 2016).

Very true. Yet, despite assurances to the contrary, it is still not evident that the NSW Government is serious about requiring miners to actually implement the rehabilitation works which had been promised in the original EIS, typically in effusive detail.

A recent ABS report revealed that, apart from heritage “derelict” mine sites, there is currently a vast backlog of instances of incomplete or non-existent rehabilitation of relatively recent mining operations, both in NSW and in other jurisdictions. This although the NSW government holds bonds or guarantees sufficient to undertake the work.

**Herein lies a magnificent opportunity for politicians to embark on a Statewide programme of ”job creation”, with all the attendant flow-on effects.**

With regard to the present application, the EIS and supporting documents refer to both “Decommissioning” and “Rehabilitation” phases, the distinction between which is not quite clear. Furthermore, no explicit provision has been made in Table 4.2 (Calculation of total net producer surplus) for these works, it being blandly stated that

***“Decommissioning costs are assumed to be completely offset by the residual value of capital.”,***

while nothing is said about rehabilitation funding.

Costing apart, the Applicant claims that rehabilitation works will be carried out progressively and that the final void will (somehow ?) be filled and the former land profile effectively restored. The quality of the rehabilitated land will also be equal or superior to that presently there.

A series of photomontages (EIS Section 4) present several pages of technically competent, but completely fanciful, digital artwork which it seems is actually being offered as **proof** that a newly built ridge composed of a mixture of overburden and rejects can within a few years be transformed into a geotechnically stable, verdant, and tree studded hill, where cattle and native fauna will peacefully roam.

**I suggest that the time has come for the NSW Government to introduce a firm policy, such that, should they contemplate granting approval to the current Proposal, or others of the same ilk, they:**

- (1) Give clear notice to the applicant that they will be held strictly to the rehabilitation undertakings they are offering;**
- (2) Ensure that secure financial guarantees are in place to fully (repeat fully) cover any rehabilitation and compensation costs which might occur in the future; and that**
- (3) In the event of such a need arising, that the necessary rehabilitation works will be carried out promptly and satisfactorily.**

### **Mine and Privately Owned Dwellings**

In evaluating the effects of noise and air pollution on “receivers”, who are at least conceded to be animate, and “receptors”, who apparently are not, a distinction is consistently drawn between privately and resource company owned homes. If the dwelling is still occupied this distinction should have no relevance, and to introduce it is to imply that the present occupants, whatever their occupancy status may be, have lost their presumptive human right to a quiet enjoyment of life.

Thus, whether or not the dwelling in question continues to be occupied, the substantive effect is that a unit of housing has been removed from the community’s effective supply, and that a family has been deprived of a secure home.

**Such external costs should be explicitly incorporated into the CB Analysis, but it is quite clear that this has not been done.**

## Dairy Farming

***“Prior to the Applicant’s purchase of the properties within the Mine Area, no dairy and no large scale commercial beef farms were in operation. However, there are currently six operating dairies within the local area together with small scale beef operations.”*** (EIS Summary p. 25).

The above statement is potentially confusing in that it seems to imply that the Applicant’s land purchases led to the creation of six dairy farms and (several) small scale beef operations. However, there are two “areas” being referred to, and the six dairy farms and the beef farms were in existence prior to the Applicant’s land purchases. The confusion (whether benign or deliberate) apparently arises from an attempt to beat up an entity called the “Speldon Partnership”, and thereby create a favourable image for GRL.

The facts appear to be that among the properties acquired by GRL were an existing dairy farm named “Speldon”, and several smaller beef farms, from some of which the operators were displaced. GRL then leased “Speldon” back to the original owner, together with some additional land. This enabled the dairy operation to expand, and GRL to portray itself as a contributor to the Valley’s agricultural industry.<sup>3</sup>

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<sup>3</sup> This is reminiscent of the early days of Gunnedah Resources Ltd., which liked to emphasise the term “Resources”, and had separate **Operational Divisions** (no less) devoted to Forestry and to Agriculture, in addition to Mining.



## Is GRL a Suitable Applicant ?

Gloucester Resources Limited has always had the flavour of a speculative venture. The original initiative, which has resulted in the current Rocky Hill Proposal, was made by a disbarred solicitor from Gunnedah, operating as Managing Director of a company named Gunnedah Resources Ltd. There are strong grounds for believing that he was relying on the advice of a geologist who was familiar with the Stroud Gloucester Syncline, and who conjectured that there were commercially exploitable coal resources lying to the north of the (then) Stratford Coal mining leases, and much closer to Gloucester township.

### LETTERS TO THE EDITOR...

#### Mining exploration

My wife and I recently saw in the Gloucester Advocate and The Land, two applications for mining exploration licences to the Department of Primary Industries by the Singleton mining division:

- a. For 2091 ha in the Berrico/Woods and Upper Avon Road area and,
- b. For 5525 ha in the Gloucester area.

My wife Narelle and myself have 450 acres on Woods Rd, Upper Avon Road, where we have recently settled and invested all of our life's earnings into breeding Murray Grey beef cattle.

One of our sons has recently expressed a desire to also settle on our property and bring his young family here to start their future in the Gloucester area. Many people are moving up here into the country to start farming activities and find a better way of life for their families.

As a result of people like ourselves coming to the Gloucester area, improving property infrastructure and productivity of their properties, these ventures put a lot of money into the Gloucester economy, helping to create jobs within the town.

These farming activities have the ability to contribute forever to the area and the State of NSW for generations whereas if mining is eventually approved in our area the country would be destroyed forever as no amount of rehabilitation can bring it back to its former productivity.

Upon reading the application our feelings were of powerlessness, dismay, helplessness, despair and

anger that our livelihood and dreams of the future could one day be shattered by any mining activity.

We feel that we would like to bring to your attention how this activity will affect us, our community and the surrounding area, ie,

- a. In talking to our neighbours and friends in the district, we are not the only people with these concerns.

- b. We are now in a period of suspense not knowing whether to improve our properties, build structures or a home for our son and his family.

- c. Our plans for more intensive farming techniques is now suspended.

- d. As a result of the application, the value of our properties has decreased and this is a great concern for our future financial wellbeing.

- d. Loss of our country environment, scenery, wildlife and the ability to continue to farm.

- e. It is of great concern to think that the present situation could be replaced by piles of rubble, massive holes in the ground, constant noise, dust, visual blight and pollution.

We do realise that this is an application for exploration, but there is presently an open cut mine on the eastern side of the Bucketts Way near Stratford with all of its infrastructure. Drilling activities have commenced on Woods Road and an upgrade of the Woods Road railway crossing and siding has commenced.

We are thereby fearful that this is the start of the formal proceedings of a future application to mine in this area.

This application does not have our support.

Max and Narelle Poole  
Craven.

11/1/06

Letter published in the Gloucester Advocate on the 11<sup>th</sup> of January 2006

A significant area of productive farmland was purchased unobtrusively, both in the immediate vicinity of Gloucester, and also down the western reach of the Valley, using various shelf company names as cover. There are numerous reports of the unsavoury tactics adopted by GRL in those early days to induce or pressure landowners into selling, and a significant number of families were displaced from their homes.

Along with many others, the authors of the letter on the previous page did sell out to GRL around that time, with a consequent loss to the community of farming businesses and families. Other Gloucester residents, such as those at Forbesdale, have now lived for almost eleven years with the go-stop-go uncertainty created by the prospective mine, their homes devalued or rendered unsalable, but with no avenue for compensation.

Gunnedah Resources subsequently changed its name to Gloucester Resources, and the venture was on-sold to new owners, who retained the name GRL. Over time the ownership structure underwent further changes, leading to the current situation of 82% foreign ownership.

Private Equity Funds and the like operate outside the rules which may constrain other forms of company structure and governance, and have as their sole object the accumulation of wealth and power for the players.

**The NSW Government has a duty of care to all of the people in the State, and should not allow a small community such as Gloucester to become a pawn in international speculative trading.**

# The EIS Conclusions

The main EIS report concludes with the customary litany of the widespread benefits which would flow from approval of the project, contrasted with the dire consequences of a refusal.

Strongly featured is the insidious argument that, because the Amended EIS has been allegedly purged of deficiencies which are now implicitly admitted to have marred the 2013 version, the current amended proposal is therefore of necessity beyond criticism.

After all, how could a Gloucester resident be hostile to a Proponent whose only desire is listen sympathetically and responsively to the Community's concerns, and commit its resources to the solution of the perceived problems ?

In transiting to the EIS Conclusions such qualifiers and nuances as might be found in the body of the EIS are ignored. Speculations about supposed benefits to the Gloucester Community and the broader economy become certainties<sup>4</sup>, while any negative externalities have now been “... **substantially mitigated to acceptable levels.**” (EIS p 6-33). Unfortunately, the report fails to identify the apparently quite laid-back acceptor.

Once again the alleged social, demographic, and economic problems being faced by the Gloucester Community are given prominence, with the Proponent identified as a benign *Deus ex machina* who will confer enduring prosperity and wellbeing on all concerned.

**Still, this section of the EIS probably does serve as a fitting summary of the extended farrago of self-serving fantasies and deceptions which the Proponent asks that the Gloucester Community accept in god faith.**

## The Vanishing Young

Prominent in the list of consequences of non-approval is an assertion that, in the absence of a Rocky Hill coal mine there would be :

**“... a continued exodus of people in primary working years forced to seek employment opportunities outside of Gloucester;”**

Coincidentally the 5<sup>th</sup> of October edition of the Gloucester Advocate carried the usual annual feature on the current Year 12 HSC Class, with, in most cases, a statement of their career intentions or aspirations. Of the 27 students who shared this information not one mentioned a carer in coal mining. And all but three opted for a career choice which would, of necessity, require that they move away from Gloucester, for some years at least, whether for further education, work experience, or travel and adventure.

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<sup>4</sup> For example: “***This assessment has established that if the amended Project proceeds, it would:***” etc ... (emphasis added) ( EIS p. 6-34).

Still, however baseless it might be, this is a claim calculated to appeal to many parents and grandparents in Gloucester. Further comments on this enduring furphy can be found in McCalden (*op. cit.* p.16).

## Dependency Ratio

The high proportion of Gloucester residents in the older age groups, which was noted in the Part 14 SCC but not further elaborated on at that point, now reappears in the list of the consequences of not proceeding with the Amended Project. It appears that one such consequence would be:

***“ . . . an increasingly ageing population including an increase in the percentage of the population over 55 years of age and the ratio of people not working relying on those that are working;”*** (ES p 28).

It is not explained why, in the absence of the Rocky Hill mine, the age distribution would move yet further to the right. It may well be that it has already stabilised at a dynamic profile which is characteristic of a retirement area.

But beyond comprehension is the assertion that those who are retired are relying on those who are working. This may be an issue of socioeconomic concern at the national level, but it has no relevance at the scale of a community such as Gloucester.

**In fact, a significant proportion of the working population are relying on the retirees in that their jobs depend on providing retail, health care, and other services to them.**

## Wrap-up

**The Amended Rocky Hill Proposal is a toxic threat to the physical and mental health of Gloucester’s population, and to the social and economic wellbeing of their community. Exploration licences should never have been granted in such close proximity to a town, nor the consequent climate of uncertainty permitted to persist for over a decade. Clearly, the interests of Gloucester residents are not being pursued. So whose interests are ?**

**There are no rational grounds for approval. The time has come to say NO !**

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## Endnote

Photo of a blast cloud which drifted over the Village of Broke on Wednesday the 5<sup>th</sup> of October 2016. Since the dominant wind direction in the Stroud Gloucester Valley is from the south, any such toxic plumes from a Rocky Hill mine would be carried directly over the Gloucester township.

