Shenhua Watermark Coal Project Submission of objection from Sharyn Munro

I have many concerns re this project.

Not addressed in the EIS is the cumulative impact of this, taken with other projects planned for the Gunnedah Basin, such as the already approved Boggabri expansion and the Maules Creek mine. Eight times the current production is planned!

The cumulative regional social, health, environmental, agricultural/other industry and economic impacts MUST be considered, given the damage I have witnessed in the Hunter between Singleton and Muswellbrook, precisely from ignoring such impacts.

Experience shows that the blithe conclusion reached by Shenhua in their 'Project Justifications', that 'the Project is in the public interest' is offensively unrelated to the reality of what happens.

Avoiding or minimising as far as possible the adverse social and environmental impacts is not good enough. 'No impact' should be the yardstick.

• The 'socio-economic benefits' that Shenhua consider to outweigh the adverse ones are spurious.

The socio-economic adverse impacts on the region, from the displaced landowners, both those under the Shenhua lease and those who will decide that it is untenable to continue next to it, are not discussed. The agricultural base of this area is being eroded to become industrial, and towns reflect that. Rural support businesses correspondingly decline. Three have closed in Muswellbrook for example.

Why is a mine job, direct or flow-on, more important than an agricultural one, which equally has flow-on jobs, or a business like Shenhua more important than the long-establish agricultural landuse?

The 1015 regional jobs outlined will not alleviate the high unemployment figures; if so, why does Muswellbrook have above state average unemployment? Mining does not create jobs for the unemployed, but sucks skilled workers from other industries, like agriculture, or rural and town businesses and services. Given the 3 MAC camps in the area, the predicted local growth in population and housing will not happen.

Demographics change with the rise in the number of transient workers, disconnected from the region's past, present or future. The huge difference of the high mine wages (twice the national average) from 'normal' wages creates a 'haves' and 'have-nots' society and accordingly, an inability to match the higher town rents or house sale prices that occur. As in Singleton or Muswellbrook or Mudgee, homelessness suddenly becomes as issue.

Shenhua paid up to seven times the going rate to get the farms they bought, yet farms in the immediate vicinity will have lost value or be unsaleable.

The Benefit Cost Analysis by Gillespie Economics is not true because it only compares agriculture and mine economic benefits over a 30-year period. That is all the mine may last for, but agriculture has existed here for well over 100 years and would continue for another 100 years – if its water supplies are not ruined.

The EIS says the mine will not have impacts on agricultural productivity outside the project: I question that, given the likely contents of the dust, the increased air pollution, from the open cut mine and the roads. The heavy metals and other pollutants that both coal and its overburden contain are not acceptable to be landing on cropping or grazing lands, on our food sources. The Liverpool Plains and its incredibly rich position as a food grower (wheat yields 40% above national average!) will undoubtedly be impacted and ought not to be placed at any risk.

How high will the overburden mountains be? I do not accept that 'best practice' will suppress enough dust.

The planned rise in coal extraction in the Gunnedah Basin requires upgrades of the rail line that we the public must fund. Upgrades for the heavier coal trains have already been done in the north-west; we paid, via our state and federal taxes. More is being done, including duplications, all the way to the coal port of Newcastle. We pay, to the tune of around \$3.3 billion altogether, I think. How is that not an unfair and unwarranted subsidy to the wealthy coal industry, yet which passes unremarked while any subsidy to manufacturing raises a hue and cry?

Health

Since I do not accept that 'best practice' will suppress enough dust, the health impacts from the rise in particulate matter are not adequately assessed. There should be baseline data being collected now for such highly likely health issues as lung function.

Nor will it 'manage' the noise emissions adequately, because no mine has managed it yet. Operating in daylight only might help, but is rarely done.

I saw no mention of whether the 'C' weighting sound monitoring was employed to take into account the Infrasound Low Frequency Noise (ILFN) emissions from dieselrun opencut mining – an extremely widespread, much ignored and very serious impact, for example north of Mudgee, with Wilpinjong and Moolarben mines. The Mid Western Council has acknowledged ILFN as a serious cumulative impact concern. The EPA is currently reviewing its Industrial Noise Policy in relation to ILFN.

Also, mine blasting is not just a change in noise level, but in the content of what is emitted. Will that be monitored and tested?

And as far as visual impacts, it is not just whether the mine lights themselves can be seen; Shenhua's representatives ought to have noticed that in a rural area the vast night sky, dark and star-studded, is one of the great wonders. Like the rural peace and quiet, this is removed at one blow by a 24 hour operation like a mine.

Environmental

The final void proposed for the Western Mining Area – another toxic legacy for our future generations so that this Chinese government owned mining company can prosper. How is this in the national interest?

And as they expand – as they always do – how many voids will there 'finally' be?

"Runoff water will only be released from the site if the quality is acceptable and during a rainfall event that exceeds the design capacity of the sediment dam". With current unpredictable rainfall events we are seeing many examples in QLD and NSW of rainfall exceeding the design capability of the sediment dam and thus the release of contaminated water – so the mine can resume operations. This would be extremely unwise across the black soil plains and into its ground water systems.

"A total of 4,084 ha of vegetation will be removed progressively over the life of the project." Given how little uncleared land remains on the Liverpool Plains, and that the Maules Creek mine will remove two-thirds of Leard Forest, this is a very large loss of vegetation which would not be countenanced, let alone allowed, under any other circumstances. It admits this is locally important habitat. Will those animals be shipped up to Barraba?

I do not see that the Barraba offset, already existing, equals no net loss of habitat. One has to ask if these proposed offsets are as useless and misleading as those proposed by Whitehaven for the Maules Creek mine. I hope your investigation of these will be more rigourous.

I am not qualified to comment on the water modelling and predictions, but here the water supplies and the interconnectivity issues are of absolutely critical importance. Depressurisation, draining, contamination, excessive drawdown, reduction of catchment: these are all real impacts in other regions from other mines. No doubt they were also deemed 'unlikely'.

The many assurances I spotted throughout the water sections made me very, very wary, given that the assurances and predictions on other matters better understood by me are empty and biased.

I think that the Shenhua Watermark project was an ill advised EL to be issued, as was the BHPB Caroona EL, and that the \$300 million they paid the previous NSW government no doubt gives Shenhua the confidence to draw their glib conclusions. Given ICAC, how did it and Caroon ever be permitted to start?

I wonder how many pieces of silver does the current NSW Government consider is worthwhile the damage this mine will undoubtedly do to the region's people, to their farming livelihoods and health and to the future of this food bowl par excellence. If you approve this mine, you open the doors to untold disaster, waterwise, on the fertile plains, since no amount of modelling can beat what locals know.

Watermark will impact far beyond its own footprint. I urge you to question everything in their EIS where concerns are raised in the submissions from others. I urge you to stop this trainwreck in the Gunnedah Basin, heading to be as bad as the Hunter. Longterm damage for short term gain.