

Namoi Community Network

Shenhua Watermark Coal Mine at Breeza NSW SSD – 4975, Watermark Coal Project

Submission by Namoi Community Network

Privacy Statement: We have read the Department's Privacy Statement and agree to the Department using our submission in the ways it describes. We understand this includes full publication on the Department's website of our submission, any attachments, and possible supply to third parties such as state agencies, local government and the proponent. **YES.**

Disclosure of reportable donations: This organisation has not made any reportable political donations. **NO.**

Namoi Community Network (NCN) is an affiliated committee under Namoi Water. NCN was established by the community in 2011 to ensure the Namoi Catchment Water Study (the Study) commissioned by NSW DTRIS in 2010 was completed proficiently and within its terms of reference. Although the Study was completed and published in July 2012, the committee has continued to meet to pursue its concerns. The national significance of water to Australia cannot be over stated. The security of water resources and water quality are the prime concerns of this organisation. It became apparent as the Study concluded there will be significant detrimental impacts to the water resources of the Namoi Valley from extractive industries.

Namoi Community Network is opposed to the Shenhua Watermark Coal Mine at Breeza NSW.

The Study did demonstrate extractive industries such as this proposed mine will adversely affect ground and surface water on the Liverpool and Breeza Plains. This proposed mine will have a significant detrimental impact on the water resources of this area, damage aquifers, and reduce the food production capabilities of the adjacent premium black soils, with their world significant physical qualities.

Objections and Impacts identified in EIS and Appendix Z Agricultural Impact Statement

Executive summary:

The summary implies there will be only minimal impact on the one of these nations' pristine agricultural regions, the Liverpool Plains. This is nonsense and demonstrates professional incompetence on the part of the authors! To employ dairy management consultants to prepare an Agricultural Impact Statement illustrates no appreciation of the agricultural significance of this region by the Shenhua.

No qualified consideration is made of the critical & essential importance clean quality water and clean air, in a clean atmosphere, play in ensuring the high efficiency with which photosynthesis presently occurs on the Liverpool Plains will continue; the same high efficiencies which can continue maximise the production capabilities of these premium soils.

Not all waters are the same. Appendix Z however suggests they are. That's simply not correct, poor water quality, contaminated with various undesirable minerals released from mining will adversely affect both water quality and the productive soils which adsorb them.

The atmosphere will be contaminated by coal mining, as is evidenced at every known open cut coal mine presently operating.

We do not accept that after 45 years the groundwater taken from the alluvial aquifer sources will be reversed and the alluvial groundwater replenished to its previous condition.

1. Which aquifers?
2. Do Shenhua really maintain that operating 900 metres from one alluvial formation will not have an adverse and reversible affect on the aquifer?
3. Which aquifers will be replenished?
4. How Aquifer replenishment will occur is not demonstrated in this EIS?
5. Do Shenhua deny there will be artificial connectivity between aquifers caused by the proposed open cut mining over the 30 years?
6. The 150 metre buffer area is an arbitrary figure not substantiated. Shenhua do not document the connectivity hydraulic values Kv and Kh within the alluvium affected. What are these values for the adjacent areas to the mines, projected over the life of the mines?
7. Will that connectivity be reversed after 45 years?
8. How will it be reversed?
9. Will the water quality prior to mining be re-established after 45 years?
10. How will water quality be re-established?
11. What recourse does the NSW Government have to ensure if, and when, damage to aquifers occur, Shenhua are required to stop, and correct the damage to aquifers?

No reference is made to the findings of the Namoi Catchment Water Study.

12. Do Shenhua acknowledge that as a result of their activities ground water will be affected in alluvial Irrigation Zones 3, 7, and 8?
13. Do Shenhua deny that as a result of their activities the ground water will drop at least 5 metres in large areas of the Liverpool Plains?
14. Is the NSW Government going to allow this irreversible damage to the aquifers of the Namoi Catchment?
15. Surface water will be impacted by less run off due to reduced catchment areas, and water will be returned from the mining area to the system in times of major rain events. There are two adverse impacts here which are not adequately addressed in the EIS.

The AIS presumes a 'common state' in its appraisal of water uptake by agriculture over the period of the mine. This is not a realistic modelling criteria to use. Historically, agriculture is ever evolving and developing; ensuring soils and water resources are maintained and enhanced for future generations. This proposal concedes water resources will be adversely affected without identifying how this damage will be reversed.

Additional adverse impacts:

1. Dust and Air Quality – We do not accept the Dooley and Rossato (2010) prediction that there will be nil to minimal impact from dust on the productivity of plant growth. We also contend there will be detrimental and adverse impact on air quality. Such impact from open coal mining is evidenced in the Hunter Valley frequently. Reference our opening statement, on the present efficiency of photosynthesis for food production on the Liverpool Plains.
2. Koala - The Australian Koala Foundation (AKF) disputes the number of koalas located in the local government area and feel there are a lot less than stated. AKF are opposed to the translocation of the koalas from the Shenhua area.

3. Ecology - A total of 4,084 ha of vegetation will be removed progressively over the life of the project. This is a very large loss of vegetation and will not be compensated for by the offsite offset at Barraba. Ecological assets cannot simply be 'transported' somewhere else. That's a contradiction of nature!
4. Future Expansion – It is stated in the EIS that a final void will remain in the Western Mining Area. It will have a maximum depth of 80 metres below the natural ground surface. Will the NSW Government regulate that no further mining, either open cut or underground long wall mining will occur in the future?
5. Increased Train Movements - All towns and properties along the rail line will be impacted by additional noise and dust from increased coal train movements. Is the NSW Government intending to give a monopoly to the coal exporters using the rail line to Newcastle, at the cost of and prohibiting grain rail freight?
6. Noise – the proposed mine is located near the village of Breeza in Northern NSW which is a quiet rural area. Infrasound/low frequency noise (ILFN) produced by machinery is known to be a problem in these types of areas due to the lack of background noise. ILFN is known to cause cardiovascular disorders, psychological problems and stress. It is of great concern to the community that Shenhua is not completing any assessment on low frequency noise as stated in the EIS "Acoustics Impact Assessment 4.6 Low Frequency Noise - no separate assessment of low frequency noise levels is required".
7. Heritage - The project will destroy significant Aboriginal heritage sites. This is unacceptable.

If the Government approves this project, they are knowingly approving the detrimental impacts of this mine at the cost of the landholders and the community. Once the mine starts, you cannot stop or mitigate the impacts to the water resources, the system enters a new state and is changed.

signed

Hugh Price.
Chairman.