

# **SOS Liverpool Plains' review of Shenhua's EIS for the Watermark Project**

**Attention:** Director Mining and Industry Projects  
**Re:** Watermark Coal Mine  
**App No.:** SSD – 4975, Watermark Coal Project

**Name:** SOS Liverpool Plains (Contact - President, Kirrily Blomfield)  
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**Disclose reportable donations:** I have not made any reportable political donation.

**Privacy Statement:** I have read the Department's Privacy Statement and agree to the Department using my submission in the ways it describes. I understand this includes full publication on the Department's website of my submission, any attachments, and any of my personal information in those documents, and possible supply to third parties such as state agencies, local government and the proponent. I agree to the above statement.

## **SUBMISSION BODY**

**SOS Liverpool Plains objects to the Shenhua Watermark Coal Mine proposed for the Breeza area of the Liverpool Plains.**

The submitter, SOS Liverpool Plains, is a group of around 60 members, which represents country and city women from all walks of life – business women, wives, mothers, teachers, medics, scientists, accountants, IT professionals, farmers, graziers and grandmothers.

The group was formed in 2007 to raise awareness of the real effects of coal and coal seam gas mining on the people, the communities, the land, the air, the workers and surrounding developments, and most importantly OUR WATER – both riverine and underground. We raise to light the facts and let the people decide. We aim to reinvigorate democracy and keep Governments accountable. We want to expose the raw link between the weakening of rights to freehold land and royalties paid to the government.

Initially raising funds through humble means, SOS Liverpool Plains has developed and built into a group that has hosted many successful events that have raised awareness of the productivity of the Liverpool Plains, whilst highlighting the threats that coal and coal seam gas place on this area. These include, but are not limited to:

- Two highly successful ‘Taste of the Liverpool Plains’ events at Caroona – which highlighted the produce of the Liverpool Plains and the threats that mining poses to this productivity.
- Numerous information evenings with informed scientists presenting.
- Community airings of the films GasLand, Rivers SOS and Bimblebox.
- Co-organiser of Gunnedah Food Community Forum with host Alan Jones.
- Presence at the annual AgQuip field days for the last 5 years.

As well as raising community awareness, we lobby politicians on many issues relating to mining and gas extraction and the protection of the Liverpool Plains from extractive industries. SOS Liverpool Plains supports the Caroona Coal Action Group (CCAG) in their work, along with other groups campaigning against coal and coal seam gas in other important biodiverse regions and important agricultural lands. In recent times, we have increased our network of contacts through involvement with the Northwest Alliance against Coal and Coal Seam Gas.

## **THE CONCERNS**

SOS Liverpool Plains object to the mine proposed by Shenhua at the Watermark site at Breeza and wish to express this following the release of the related Environmental Impact Statement. We object on many grounds, including the mines likely negative impacts on human health, aboriginal heritage, agricultural productivity, riverine and underground water quality, flora, fauna, traffic, soils, agricultural land capabilities and the associated social impacts on surrounding communities. We are also concerned about increases in dust, noise and other hazards.

Such concerns of SOS Liverpool Plains are represented in the Nature Conservation Council’s commissioned report, *“Economic assessment of environmentally damaging mining and gas developments in New South Wales”*<sup>1</sup> – which highlights the overstated benefits of mining with regard to economics and employment, whilst the important issues of the *environment, public health, native vegetation and existing industries* are not sufficiently addressed.<sup>1</sup>

Areas that SOS Liverpool Plains have concerns about include:

### **Ecology**

The removal of CEEC areas of vegetation from within the Watermark project area is unacceptable, given that some of the stated offsets remain outside the Liverpool Plains area and are currently being questioned as to their eligibility as CEEC areas.

### **Human Health**

The Australian Government’s own National Health and Medical Research Council’s 2009 Public Statement<sup>2</sup> advises that all children should have their exposure to lead minimised<sup>2</sup>. “Children (beginning prenatally) are at the highest risk for lead poisoning because they have the highest exposure, highest absorption, increased

penetration of the blood–brain barrier and a developing nervous system that is most sensitive to damage resulting from this heavy metal pollutant”.<sup>3</sup>

Lead is just one of the heavy metals contained in coal, extracted with it, and released into the environment from which it was previously restricted via its placement hundreds of metres underground. The release of lead and other heavy metals like mercury, cadmium and arsenic into our environment is unacceptable and a risk to the health of those in surrounding communities. The heavy metals will be carried in air, water and released upon the burning of coal in power stations.

It may be argued that lead carries just 9ppm of lead. This however, equates to 9grams of lead per tonne of coal removed. With each train wagon carrying 100tonne of coal, that’s 900grams of lead per carriage and 72kg of lead per 80 carriage train. Such trains will be travelling past thousands of people as they make their way through communities and to the coal port with loads uncovered – not to mention those communities surrounding the actual mine area - the Breeza residents, land holders and those living around power stations where the coal is burned.

There is increasing evidence of the negative health effects of coal mining on surrounding residents and The State Government, if approving new mines, will do so at the risk of future human health problems and the potential implications of group actions against Government. This is also in light of the fact that there is currently a Health Impact Assessment (HIA) proposed for the Gunnedah Basin which may provide further evidence to support the risks of coal mining on surrounding communities and residents of the Shenhua proposed mine.

Please see the HIA proposal here - <http://maulescreek.org/wp-content/uploads/2013/04/Gunnedah-Basin-HIA-Proposal-Draft-3.1-Dec-2012.pdf><sup>4</sup>,

***SOS Liverpool Plains recommend that the NSW Government defers its decision on the Shenhua Breeza coal mine until the completion of this proposed Health Impact Assessment***

### **Future Potential of the Area**

With the Liverpool Plains just 4 hours from Sydney, and produce growing areas around Sydney quickly being built out and the Hunter Valley’s production potential already inhibited – the potential for the Liverpool Plains to be the next produce food bowl (fruit and vegetable production) for the ever burgeoning Sydney population is quite real. This Liverpool Plains area, including the Shenhua mine site should be set aside for current commodity and potential future produce production.

### **Cumulative Effects of the Mine**

The effects of the Shenhua coal mine and its likely effects stated in the EIS should not be considered alone. There is currently another coal mine (BHP) exploration license area to the south of the Shenhua Breeza site, whilst much of the surrounding region is covered by a coal seam gas exploration license. Hence, it would be negligent to consider the approval of the proposed Shenhua mine based solely on the prepared EIS, but rather should be considered given the combined potential

effects of it with other proposed projects. This pertains to dust, noise, water, human health, increased train movements and the effects on surrounding towns.

### **Fauna**

The translocation of koalas from the proposed mine area, with questionable success of such a proposal, along with opposition to this by the Australian Koala Foundation is unacceptable.

### **Water**

The Liverpool Plains area receives very heavy storms, which has caused flooding across the region the last three summer seasons. It is of great concern that such a storm may add to, and exceed, the capacity of sediment storage dams, resulting in contaminated water being released across the black soil plains, into ground water systems and into the Mooki River, which is at the headwaters of the Murray Darling Basin.

SOS Liverpool Plains is opposed to the potential reduction in water flows of 25% at Watermark, as stated in the mine proposal.

### **Noise**

SOS Liverpool Plains is concerned 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".

### **Prioritise**

With already hundreds of mines un-remediated across the country, rehabilitation of these should surely be a priority before the initiation of any new mines.

If the Government approves this project, they are knowingly approving the mine at the cost of surrounding landholders and communities.

See attached a detailed review of the Soils section of the EIS, ("Environmental Impact Statement. Soils, Rehabilitation Planning and Salinity"), prepared for SOS Liverpool Plains by SoilFutures Consulting Pty Ltd.

### **CONCLUSION**

In conclusion, SOS Liverpool Plains oppose Shenhua's proposed open cut coal mine at Watermark near Breeza.

We recommend that the State Government considers Shenhua's EIS in conjunction with cumulative effects of other proposed projects and given the potential for future class action against the NSW State Government as more health data becomes available that indicates the Government would surely be negligent in approving future open cut coal mines.

SOS Liverpool Plains also recommend that the State Government defers a decision on the approval of the Shenhua mine until after the findings of the Health Impact Assessment of the Gunnedah Basin.

## References

1. [http://nccnsw.org.au/sites/default/files/Economic%20assessment%20of%20environmentally%20damaging%20mining%20and%20gas%20developments%20in%20NSW%20-%20EAL%20and%20TAI%20\(April%202013\).pdf](http://nccnsw.org.au/sites/default/files/Economic%20assessment%20of%20environmentally%20damaging%20mining%20and%20gas%20developments%20in%20NSW%20-%20EAL%20and%20TAI%20(April%202013).pdf) 25<sup>th</sup> April 2013.
2. Lead Exposure and Health Effects in Australia – NHRMC position, <http://www.nhmrc.gov.au/your-health/lead-exposure-and-health-effects>. 25th April 2013.
3. Training for Health Care Providers. <http://www.who.int/ceh/capacity/Lead.pdf> 25<sup>th</sup> April 2013
4. Gunnedah Basin Health Impact Assessment Proposal <http://maulescreek.org/wp-content/uploads/2013/04/Gunnedah-Basin-HIA-Proposal-Draft-3.1-Dec-2012.pdf> , 26<sup>th</sup> April 2013.