

Department of Planning and Infrastructure

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**RE Shenhua Watermark EIS STATE significance assessment- response Watermark Coal Mine SSD-4975,  
Watermark Coal Project**

**This is not a form letter this is a formal submission which captures the concerns of individuals and families- Gomeroi and other Aboriginal parties**

Please accept our submission regarding the proposed Shenhua Watermark Coal project as we are very concerned about this project being approved on cultural, social and environmental grounds.

The Shenhua Watermark project if proposed in its current form will destroy two highly significant sites both large grinding groove complexes. The enormity of the three pit open cut mine is highly concerning and will create irreparable damage to the environment, community life and our food resources and water resources.

The archaeological assessment to inform the EIS is flawed and has failed to document and record all archaeological sites- the adequacy of coverage has been a constant concern and this has resulted in a non-trust of the assessment nor its outcomes- the predictive model is severely flawed due to the percentage of coverage and the archaeological values of the site are compromised.

We do not believe these concerns will be adequately addressed as once approved- the damage and destruction will be approved. Shenhua Watermark have also made no attempt to explore how they could modify or reduce their mine pits to avoid the grinding groove sites though it is stressed that both should be saved. They have excised out of the project native Title land tenure in order to remove the possibility of negotiating with Gomeroi people. Indirect impacts to unextinguished native title lands have not been captured and vibration and blasting place these areas at risk.

The grinding groove complexes are large and are not in a typical area where grinding grooves may be found. They have hundreds of spear markings rather than axes grindings indicating a large men's area.

Kamilaroi are well documented as one of the few Aboriginal people to have gone to war against the invasion of non-Aboriginal people. The location is incredibly important – with an inter-relationship between the Dreaming hills Mooki River and Lake Goran.

**There are numerous environmental concerns**

The EIS study fails to protect our Koala population – the size and location of the proposed project will have a devastating impact on the koala population – NSW government are supposed to protect the koala approval of this mine is inconsistent with these statements.

The EIS also fails to demonstrate how our birdlife will be protected- some of these birds are totems- we need the habitat for them even when rehabilitation of areas occurs the lower forest growth does not come back for many years the impact to breeding programs is significant and the ecological balance is at risk

The impact to underground water is inadequate- stating that they will use existing farming licences is poorly thought through as there are more water licences than water supply sold throughout NSW. Guarantees to management contamination and water quality are poorly applied.

Dust and vibration from the mining activity and truck movements is also of concern on water quality human air quality. The amount of truck movement and people movement alone will increase the numbers of road kill and this is not mitigated nor are there programs in place to ensure that our cultural foods and totems which need to be protected will not become carnage on the roads.

### **Social concerns**

The Social impact assessment does not provide real commitments by Shenhua to address social and cultural impacts the document reads like a list of possibilities and not commitments. Mining companies should be provided with a carte blanche approach to destroying the area and not mitigate with firm commitments.

For example there are no long term commitments and offsets are listed as life of mine not in perpetuity. The social impact assessment also completely missed the impact to the region of Shenhua buying out the farms in the area and the impact this will bring to social services and town viability numbers, A fly in fly out community will change the social fabric of our communities the history of boom bust cycles of mining are in the living memory of people in the region- the mine EIS fails to carefully plan for this – learn and refer to the experiences of other areas and develops measurable and demonstrated strategies to reduce this risk. The development of mitigation is considered setting the bar very low and not providing for clear and contemporary strategy to ensure that the benefits that arise from the mine re economic benefits to the state is not at the detrimental and devastating cost to the local community including our aged and Aboriginal communities where there is a history of further disadvantage rather than a shared benefit to families.

There are approximately 15000 Gomeroi people we have an active local Aboriginal community and we do not believe this project will protect what is important, we do not believe that the environmental impacts can be mitigated and our precious resource water can be maintained. Of deepest concern to us as a people is the destruction of not one but two very large and very significant grinding groove complexes of extremely high cultural value. For these reasons we ask to Minister to please not approve the project as the cost environmentally, socially and culturally are just too great.

Yours faithfully

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