# Opposition to the Hume Coal Project EIS SSD 7172

Having been a visitor to the southern highlands for over 35 years and now a resident of Exeter (22 months), I wholly reject the notion that approval of the Hume Coal mine will not have significant negative impacts on choices made by tourists, employers and investors. The Hume Coal EIS implies that tourism in the southern highlands is trivial and that the mine is needed for jobs. This is inaccurate on both fronts.

## Hume Coal jeopardises the southern highland's tourism success and brand image

The southern highlands has one of the highest levels of tourist expenditure of any non-coastal local government area in NSW<sup>1</sup>. In the year ending June 2016, 1.7 million visitors (including 11,100 international visitors) generated 1.2 million overnight stays comprising stays of 2 nights or more on average and annual visitor expenditure of \$261 million<sup>2</sup>.

The scenic 'English' beauty of the highlands and the visual amenity of its gardens, vineyards, national parks and reserves form part of the magnetic appeal of the highland's Top 20 attractions<sup>3</sup>. On its own, the Bowral Tulip Time Festival in September attracts an estimated quarter of a million visitors every year<sup>4</sup>.

The potential for disruption and damage to the area's lush green countryside, its gardens and vineyards because access to quality groundwater has been depleted by Hume Coal is unacceptable. Hume's EIS says that the groundwater draw down of 93 bores on properties will take between 36 to 65 years to recover and some may never do so. This will prevent current or future businesses from utilising that land for other value-added purposes, such as cut flowers and wine grape growing and the marketing of specific niche tourism products such as farm tourism and Eco-tourism<sup>5</sup>.

# Hume Coal risks the region's employment in tourism and agriculture

Tourism supports 2,500 FTE jobs in a variety of occupations in restaurants and cafes, accommodation, heritage and unique places of interest, shops and rural agri-tourism, including vineyards and berry farms<sup>6</sup>. The Hume EIS minimised tourism as an employer because it only considered 'accommodation'. In contrast, the Australian Government's Austrade identified 707 tourism businesses in the area<sup>7</sup>. Indeed, the Southern Highlands outperforms the NSW state as a local employer in retail trade, manufacturing, education and training, construction, accommodation and food services, agriculture, forestry and fishing<sup>8</sup> and many of the jobs in these sectors service or benefit from tourism. In 2011, the greatest increases in employment (+745 jobs) were in health

- <sup>4</sup> Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.
- <sup>5</sup> Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

<sup>6</sup> Facts & Figures, Destination Southern Highlands, drawn from Wingecarribee LGA implicit in the Capital Country Tourism Satellite Account 2013/14.

<sup>7</sup> Australian Government Austrade, Tourism in LGAs, Wingecarribee 2013.

<sup>8</sup> ABS 2011 Census, accessed from Campbell, R., & McKeon, R, Local Economic Impacts of the Hume Coal Project, Australia Institute Presentation of Data May 2017.

<sup>&</sup>lt;sup>1</sup> Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

<sup>&</sup>lt;sup>2</sup> Facts & Figures, Destination Southern Highlands, drawn from Tourism Australia's National and International Visitor Data, Year Ending June 2016.

<sup>&</sup>lt;sup>3</sup> Trip Advisor LLC Top 10 Attractions in the Southern Highlands, accessed 21st May 2017.

care, retail and accommodation and food services<sup>9</sup>; which the prospect of the mine puts in jeopardy with little in return.

### Hume Coal returns little by way of employment for the risks it creates

Hume Coal expects that "on average there will be up to 275 full-time positions" over the life of the mine (19 years). This is a poor return. It risks job losses in both tourism and agriculture so the net effect for the region could be negative. All 275 jobs will end with the mine's end and there is no guarantee a single job will be filled by a local resident. According to the NSW Minerals Council, mining only employs 81 residents of the Wingecarribee Shire<sup>10</sup>. Thus, mining's comparative employment contribution to the Southern Highlands has been minor but Hume Coal's potential for negative impacts will be major.

The combination of noise, coal dust, water drawdown of bores and the prospect of groundwater pollution from Hume Coal's plan to re-inject toxic coal slurry into underground voids beneath the aquifer must affect the region's scenic image and its actual and perceived environmental purity. In this sense, even the prospect of the mine can create uncertainty and that has the potential to stifle the region's future prospects in those which are currently strongest – they being manufacturing, agriculture, tourism and retail<sup>11</sup>. Moreover, the Mine's use of water runs counter to the plan of Wingecarribee developed with the Southern Highlands and Moss Vale Chambers of Commerce in their Economic Framework 2031<sup>12</sup> where initiatives in the 'water' sector alone provide for 300 jobs.

#### Hume Coal has no plan and no funds for remediation if it all goes wrong

Hume Coal presents no credible plan for remediation of the groundwater if it all goes wrong. Their plan assumes that the preventative measures they implement during mining will not fail. Moreover, it seems they would not have the funds to act as while the royalties to NSW are projected to be \$118million, these are offset by an estimated cost of \$131million for groundwater impacts. Thus, the project is deemed likely to result in a net loss of \$12.5million to the NSW community.<sup>13</sup>

This casual approach appears endemic to the industry and bodes ill for the southern highlands and the taxpayers of NSW in this case. According to a report by the Auditor-General, provisions to rehabilitate mines in NSW are inadequate with some activities required for effective rehabilitation not covered or not covered adequately and while security deposits "should cover the full costs of rehabilitation" those held by the Department of Planning and the Environment "are not likely to be sufficient..."<sup>14</sup>

In summary, Hume Coal must be rejected. It jeopardises the success of the region as a mecca for tourists; it puts at risks many more jobs in agriculture, tourism and retail than it offers; it is at odds with the Southern Highlands Development Framework which has plans for jobs in their '000s (and no mine); and, in the end, Hume Coal has no plans and no funds for a substantial deposit for remediation. The risks far outweigh any claimed benefits.

<sup>&</sup>lt;sup>9</sup> 'Emerging Groups', Australian Bureau of Statistics, Census of Population and Housing, 2011 Compiled and presented in economy.id by .id, the population experts.

<sup>&</sup>lt;sup>10</sup> Lawrence Consulting UOW Centre for Small Business & Regional Research, NSW Mining Economic Impact Assessment 2014/15 Prepared for NSW Minerals Council October 2014 p.50

<sup>&</sup>lt;sup>11</sup> Insight for Government & Business, Regional Statistics, IRIS Market Research, January 2013.

<sup>&</sup>lt;sup>12</sup> Southern Highlands Development Framework 2031+, Development Update, February 2017

<sup>&</sup>lt;sup>13</sup> Campbell R & McKeon R, Economic Assessement of the Hume Coal Project: Discussion Paper, Australia Institute, June 2016.

<sup>&</sup>lt;sup>14</sup> Hannan, P 'Rehab for NSW mines comes up short: report', Sydney Morning Herald, May 12, 2017, News p.4