

Berrima Resident

Berrima NSW 2577

Email: kimomulberry@gmail.com

Executive Director, Resource Assessments

Department of Planning and Environment

GPO Box 39 Sydney NSW 2001

**This is a personal submission of objection for Hume Coal Project (7172) – a State Significant Development for Mining**

**Introduction**

Hume Coal produced a vast quantity of information for their Environmental Impact Statement (EIS). This was overwhelming for an individual to review. It is noted that Hume Coal displayed the EIS for longer than the mandatory exhibition timeframe, however it was still unrealistic and unreasonable for an individual to digest. With this in mind any omission to comment on specific information in the EIS should not be taken as palatable – it is likely if more time permitted, more concerns would be raised.

*The Department of Planning & Environment exists to make people's lives better by making NSW a great place to live and work* – quote from the DP&E website. If this statement were true, the Hume Coal project would not be approved.

The 22 years the mine is proposed to operate will cause significant impact on the environment. The impacts are at the cost of natural resources and to community lifestyle. These impacts are likely to extend far beyond the operating phase and become an intergenerational burden. Many of the impacts that threaten the environment are irreversible. The impacts are discussed below and some questions are also posed to the DP&E for its consideration.

**Water**

Water quality, quantity and access are linked to the local community, economy and biodiversity.

Surface water feeds into Sydney's drinking water catchment – and although the EIS claims little impact to this resource, the impacts to ground water are likely to be irreversible.

Ground water is known to be currently under pressure. Furthermore, ground water proposed to be extracted for mine operations will be retired as a waste product – a natural resource that takes potentially thousands of years to recharge – leaving the community a long term debt. This is not sustainable development.

The Medway mine is known to have caused the regional aquifer to discharge through voids created by mining operations – resulting in lowering of the water table. Other coal mines in the Special Catchment Area have also caused similar impacts. These impacts cannot be reversed.

## **Community**

The community of Wingecarribee Shire is united on its stance as a Coal free shire and this is further demonstrated by formation of Battle for Berrima action group. This community is fiercely determined to protect its lifestyle – demonstrated by the recent win and landmark court decision against Hume Coal accessing private property. Chief Judge Brian Preston of the Land and Environment Court ruled in favour of the landowners and ordered Hume Coal to pay their legal costs – a decision that will have severe ramifications for mining.

Events such as dust storms and bushfire create air pollution and result in depositing material over dwellings and property – however, these are seasonal events, largely unavoidable and are natural occurrences. They are not subject to approval from DP&E. The proposed mine will generate dust that is likely to be deposited downwind for 22 years. As the predominant winds are from the west and southwest, much of the dust will be deposited over Berrima and New Berrima.

Berrima Public School has around 140 students every year. The school is less than 3km away from proposed stockpiles and predominant winds will carry dust – despite Hume Coal's proposed measures. Even the example of dust from loading and transporting coal via rail over 22 years will generate spillage on rail carts and such is likely to become airborne. Many school families share the concerns of their children attending school and developing health effects from coal dust. NSW Health comment that fine particles below 2.5 µm in diameter may be of a greater health concern than larger particles as they can reach the air sacs deep in the lungs. However, coarse particles (PM 2.5-10) could also be associated with adverse health effects. They also identify children as more susceptible to the health effects. Symptoms from such effects include cough; wheeze, or worsening of asthma; increased need for medications (e.g. puffers, antibiotics); and/or increased breathlessness. The proposal threatens the health of school students. The DP&E should not want to wait until evidence of health risks occur as these children develop. The proposal should be rejected as health effects on the community are unacceptable and irreversible.

In addition to health effects are the amenity impacts including dust depositing on fabrics (such as washing) or on house roofs, and the transport of dust from roofs to water tanks, during rain events. This would likely occur across Berrima and New Berrima.

Other reductions in lifestyle quality include impacts associated with noise. Although the EIS claims that background noise will be acceptable levels, any background sound that reminds the Berrima community of the mine is likely to trigger frustration or anxiety.

The EIS claims that a well-managed accommodation village housing non-local workers will address pressure on the local community. The additional 300 operational workers (and compounded by the shorter term 1200 construction workers) will require recreation – and this will add pressure on natural reserves in surrounding Berrima. This is also likely to affect biodiversity and the community.

The interactions of workers off-duty is likely to create tension within the local community – as they will be associated with a mine the community does not want. This may create a polarised community – and this is socially unhealthy.

### **Aboriginal Heritage**

It is troubling that the proponent can contemplate damaging up to 10% of the heritage items on the proposed site – and justifying this by claiming that it avoids impact to the remaining. Our laws are made to protect heritage. Once they are damaged or destroyed – this cannot be reversed.

### **Extraction method**

Within the community there is much concern about the extraction method – and uncertainty about what will happen if it does not work. What lengths will Hume Coal resort to in order to extract coal? Will it leave the only viable option to open cut?

Concerns are that there are no previous examples of pine feather mining, and no evidence to suggest it will work – with the limited details provided, how is extraction even profitable? The DP&E needs to be aware that if it does not reject this proposal it leaves open the procession of Hume Coals ongoing potential modifications that will be easier to get approval – in order to make a profit.

The DP&E needs to seek further clarification on the consequences of the extraction method being unprofitable – and take a strong stance that there will be no variation approved to the extraction method unless it is an internationally proven method of lower impact.

### **Economy**

The jobs the proposal claims to provide will last far less time than the negative impacts on the community – see comments on water and community.

The threat of a mine is likely to create a negative image of Berrima, and a less desirable place to live. This will affect real estate values. Even if the development is approved and infrastructure is not built for some time, the changed perception of Berrima will alter potential buyers' appetite to pay the asking price. Buyers may offer less – on the premise that Berrima real estate is not worth as much with an adjoining mine. This may potentially affect every Berrima property owner by \$100,000's. Property devaluing is not in the interest of the Berrima residents.

It is well known in the community that some Berrima residents that adjoin the proposed mine site have not entered into make-good agreements. There is an image that Hume Coal is pushing their way in without resolving make-good agreements. This is likely to affect adjoining rural business.

Tourism and the guest accommodation market will suffer for the same reasons as real estate. That is the threat of a mine is likely to create a negative image of Berrima, and a less desirable place to escape to. The mine is not within the best interests of this market.

## Biodiversity

Biodiversity is the real loser in this case. Flora and fauna cannot write a submission or protest about their loss of livelihood that is threatened by the proposal. Even fragmented landscapes are important to the connectivity between larger patches. Clearing of native vegetation, loss of hollow-bearing trees and removal of dead wood and dead trees are all key threatening processes – and their activation via the proposal is likely to push threatened species closer to extinction and push common species closer towards being threatened.

**Threatened species** - The endangered *Eucalyptus aggregata* population in the Wingecarribee local government area (Black Gum) was not recorded in the studies. This must be an oversight. What else did the ecologists fail to detect? This is what is called a false negative. The likelihood of the Black Gum growing on the proposed mine site is extremely high. It is reported that fewer than 100 plants exist in three subpopulations – Berrima, Sutton Forest and Medway. The proposed mine is within the triangle of these three locations. Furthermore, it is likely to be growing in the property suspected to be owned by Hume Coal on the south side of Medway Road east of the Freeway (associated with Black Springs Creek). These trees are observable from Medway Road. It is likely that these trees will be impacted from the rail link.

The population of Black Gum cannot call home to many other locations; it requires this type of geology and position in the landscape. The DP&E should require the applicant to provide further information based on field survey to detect the presence of this species. As noted the proposal will be applying the Biobanking system to mitigate impacts to biodiversity – this endangered population likely to be impacted should generate more credits than what is currently estimated.

Hollow dependant fauna such as the Squirrel Glider are not highly mobile and are unlikely to use nesting boxes as dens. This was demonstrated in a recent study by Professor David Lindenmayer and others who report on the anatomy of a failed offset (see volume 210 of Biological Conservation).

**Aquatic dependant ecosystems** - Gaps between periods of drought are likely to span 7-14 years based on El Niño–Southern Oscillation cycle – and could last for 2-4 years. The proposed mine plans to operate for 22 years, how can they monitor the effects on aquatic dependant ecosystems during drought periods? It is likely that the impacts will occur during proposed operation phase and the effects not detectable until the end of the project. Monitoring is tokenistic and will not gain the long term data required and will not have sufficient time to assist decision making.

These aquatic dependant ecosystems will be affected by the proposal – however, it is likely to be a major contributing factor to their decline yet perhaps not the straw that broke the camel's back. In such case it will be easier for the proponent to claim its decline on other factors. The DP&E should request that indirect impacts to these aquatic dependant ecosystems are included as BioBanking credits as opposed to 'let's wait and see'.

BioBanking will offset – yet it will not avoid irreversible environmental damage. Once the habitat is modified and the species are local extinct – then that is irreversible.

## Summary

The proponent claims that the project is justified on economic, social and environmental grounds. The comments provided in this submission present serious negative effects on economic, social and environmental grounds.

The proponent claims that the project avoids serious or irreversible environmental damage. The comments above identify that the proposal does not avoid serious or irreversible environmental damage.

The DP&E claims to *exists to make people's lives better by making NSW a great place to live and work*. The DP&E is also the Government Authority who makes an assessment and determination on the Hume Coal Project. Please allow the community to continue to have a great place to live – reject the proposed Hume Coal Project.

Please provide a response via email.

Kind regards.