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## **This is a submission to the Hume Coal Project EIS. SSD 7172**

I have resided in the Highlands for almost a year and a half. However my contact with this special place goes back to the late 1980's and that is why we chose ultimately to settle here.

From the late 1980's to the early 2000's my in-laws owned an historic cottage in Berrima's Oxley St. and we frequently travelled down with our young children to escape Sydney and enjoy the Highlands. Unfortunately in the early days it was pre freeway with the Hume Highway thundering through the middle of the Berrima village. Fortunately they owned it long enough for the freeway to be opened and Berrima return to its 19th century bliss. So fast forward, here we are in 2017 and a Korean company with dubious a reputation (google Posco Human Rights if you want to know more) has bought and old mining license that has existed since 1959. For almost 50 years this license failed to be developed by all previous owners. Why? Because a mine did not make sense on many practical levels even in the 1960's when generally development triumphed over the environment and the will of the people.

The Hume proposal confounds many reviewers as it just has so many holes. In fact the current proposal is so skinny on real fact for a high risk proposal that it should be rejected on that basis alone and should not warrant closer examination.

Posco Hume Coal's behaviour with the community has almost been colonialist in its nature. The locals know nothing and we Posco Hume Coal are superior. Possibly it is the fact that Posco is not familiar with dealing with advanced countries as not a partner in a joint venture and Posco is surprised the local population will not blindly accept their "facts" which are mostly the results of models which with some small changes in parameters would generate wildly different "facts".

It is puzzling why Posco Hume persists. They still speak with conviction that they have support of the community when a recent independent survey by Galaxy revealed only 18% of residents surveyed across all demographics and locations in the Wingecarribee Shire supported the idea of a mine. The Wingecarribee Shire council submission is a quality document and sets the record straight on Posco Hume's misstatement of fact on so many aspects of the Southern Highlands. The expert reports commissioned by Battle For Berrima and Coal Free Southern Highlands are loaded with excellent observations and deserved criticisms of the proposal. But enough of the general comments here are only some of the specifics.

I object to this project and believe it should be rejected due to

## **The Impact on the heritage of Berrima, Sutton Forest and Exeter**

The construction of above ground infrastructure will directly impact on cultural landscape of the surrounding villages of Berrima, Sutton Forest and Exeter.

The EEM HIS is deficient in its assessment of the impact on Berrima, which is one of the best conserved towns from the colonial period in Australia. Berrima is a significant heritage village and attracts over 200,000 visitors a year. The rural landscape around Berrima is integral to its attraction of tourists and therefore to the future of the Berrima tourist dependent economy.

The construction of the mine and rail infrastructure will deter visitation to Berrima especially from the south.

The EEM HIS argues the visual impact on public views across the Mereworth landscape will be low to moderate. This is misleading and appears to be based on a limited set of viewpoints.

The Landscape is generally Zoned E3 by the Wingecarribee LEP 2010 which has a goal to preserve the rural landscape character and the significant cultural values of the landscape. This development does not meet these goals.

The structures will be large and will impact views both public and private. It is misleading to assume that because travellers on the motorway will be moving at speeds of up to 110kph the impact on views will be low as even glimpsed views that have negative connotations impact on the perceived aesthetic qualities of a landscape.

The Hume Coal EIS promotes the argument that because the cement works currently exists and has visual impact it is acceptable to add more large and visually intrusive structures. This is a very weak argument and should be discounted entirely.

## **DAMAGE TO THE EXISTING HIGHLANDS ECONOMY**

Existing Economic Plans maintain the Highlands natural environment and heritage. **Coal is not part of that plan.** It threatens our future sustainable prosperity.

The Southern Highlands local government, industry and community have a long term plan for the region's economy which takes advantage of its environment, location and people and groundwater that the region depends upon, and the regions "clean and green" image. Investment in the region will be suppressed as long as there is a possibility that the mine will be built. (For Hume the Bell Tolls –Australia Institute 2017-page 5)

## **POOR ECONOMIC RETURN TO NSW**

The proposal as developed by Hume Coal represents a poor economic return with incremental (economic) benefit for NSW in NPV 2016 dollars (7% discount rate) for the 19years of operation of only \$295m which includes \$114m in royalties payments to the NSW Government (EIS Appendix Q page 40)

The incremental economic benefit ignores the loss of agriculture production by the projects impact on 93 bores on 71 properties.

## **NOISE, DUST, AIR QUALITY AND LIGHT-SPILL FROM MINE SITE**

Limited mention is made in the EIS of noise impacts on the Berrima Village Precinct located 1300m boundary to boundary to the north east of the mine and rail infrastructure. Noise reading taken in New Berrima of 75dB, close to the existing Boral Cement works and does not reflect the actual noise impacts there will be for the villages of Medway 1100m and Berrima 1300m. ES4.5

Potential coal dust from trains, coal handling equipment and stockpiles and diesel emissions, have the capacity to be detrimental to air quality and health for the residents of Berrima (1300m), New Berrima (1300m) and Medway Villages (1100m), as well as Bowral, Burradoo and Moss Vale (considering prevailing south westerly wind conditions).

## **THE IMPACT ON GROUND AND SURFACE WATER**

The following points admitted in the Hume Coal EIS send a chill down my spine

1/ 93 Bores on 71 properties will be affected by water drawdown. The impact on bores will remain for between 36 to 65 years, after mining ceases. (ES4.1.2)

2/ It is expected that some bores affected may never fully recover.

3/ Treatment and release into Oldbury Creek of surplus onsite mining water in years when above average rain falls. (ES4.1.1). Rainfall can vary from almost nil to over 250 mm in a month, so averages ignore the very real fluctuations that exist. Very large monthly rainfall events have been recorded in Moss Vale of Feb 254mm, March 237mm, April 210mm, June 318mm, August 217mm and Nov 176mm Source Elders weather site). Rainfall of this level will have the Posco Hume site awash with runoff.

4/ Again if there is any discharge into the surface or ground water systems in the Sydney water Catchment, then the applicant must demonstrate that the development has either "a neutral or beneficial impact on water quality". It simply not possible for Posco Hume to demonstrate this.

5/ Water used to wash coal and residual "spoil", which will be pumped back underground into mine voids, which has the potential to impact groundwater systems. ES41.1.1

6/ The fact that existing old and considerably small mines are leaking some 3.5ML/day and attempts to stop this loss of water has failed must ring alarm bells, particularly when the Posco Hume mine is considerably larger.

7/ The potential impacts of the Hume Coal proposal on water and the Sydney Water Catchment must be considered within the context of the widely accepted "Precautionary Principle" which is a fundamental principle of ecologically sustainable development and which is a benchmark used in the assessment of planning in NSW.

Have we learned nothing over the last 50 years? Water is precious and we need to guard our supplies from projects such as this?

## **.THE POOR ECONOMICS OF THE HUME COAL PROJECT.**

From the data in the EIS it is apparent that the project is marginally profitable or simply unprofitable, with negative investment returns.

1/ This is a small scale mine (as coal mines go) and costly to operate.

2/ The product mix revealed in the EIS results in lower revenue than previously put forward, with nearly half the production low value thermal coal.

3/ The only way that the mine can improve its profitability would be to significantly increase production, making the EIS invalid in its present form.

4/ BAEconomics have not been asked to undertake the sensitivity analysis of how much output prices would need to fall for the project to have a zero NPV because Hume Coal considers it to be "commercial in confidence". (EIS Appendix Q page 42). This is unacceptable and an apparent inability to meet the 2015 guidelines for an EIS.

## **THE REJECT EMPLACEMENT AND BULKHEAD ISSUES**

1/ The Metropolitan Colliery emplaced at least some of their rejects in mined voids in recent years. This operation required extensive experimentation over a number of years.

2/ Metropolitan Colliery had the advantage of knowing the exact composition of their reject material and voids that were well away from current mining areas.

3/ The Airly Colliery considered this method of reject disposal but decided it posed unacceptable safety and other concerns.

4/ In contrast the Hume EIS assumes that reject emplacement behind bulkheads is a risk free process. The design of the bulkheads is complex and their construction in an operating environment is problematic.

## **CONTEMPT FOR THE READERS OF THE EIS**

Posco Hume shows contempt for the readers of the EIS by the "management" of information and "facts" to meet Posco Hume's objectives. A great example is the **"Do Nothing Alternative"** analysis. This is weak analysis and generally reflects Posco Hume's attitude. It is inaccurate and incomplete.

1/ The EIS states that the Do Nothing Alternative would leave 50 Mt of coal unrecovered. Long may it remain unrecovered, just because it exists there is no reason to mine it. No Mine would also lead to the highly beneficial result of 93 bores on 71 properties being unaffected allowing for the continued pursuit of economic benefits by the current and future land holders.

2/ Similarly the significant threat to the aquifer and the consequential impact on the Sydney water catchment would be eliminated.

3/ The significant costs of remediation which will ultimately be partially borne by the community as a cost of Hume Coal's operation would also be avoided. (As this expenditure is a tax deduction for Hume Coal).

4/ The foregone rates royalties and taxes which amount to \$316m over the 23 years the project runs is a small price to pay to maintain the security of our water resources and to avoid the health risks associated with the dust and noise produced by the mine and the transportation of the coal. Taxes paid on the growth of the sustainable economy may exceed that number over 23 years.

5/ The impact of the "do nothing alternative" on employment opportunities are significantly overstated. In assessing the benefits of the project Hume Coal in the EIS acknowledges that 80% of the people

employed by the project would find "alternative employment in NSW in the absence of the project". Therefore only 20% of the 414 construction jobs and 300 operational jobs can be counted in the Do Nothing Alternative.

6/ Alternatively the Do Nothing Alternative will allow for the unimpeded growth of the major employing industries in the Southern Highlands namely Retail and Accommodation and Food.

7/ The removal of 2920 (8x365) coal train journeys each year for the next 19 years will significantly reduce the time delay and negative safety impacts on the 17 rail level crossings regularly used by business and private transport users. The reduction in rail traffic on the existing line from the Berrima Cement works to Port Kembla would result in lower maintenance costs. It will also remove dust and noise issues from all localities along the route of the coal trains.

This proposal threatens our heritage of the Highlands and I urge the Government to reject this project.

Signed,

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