Vickery Coalmine Extension Submission

Objection

As a former Narrabri resident of 70 years, and now a refugee from climate change living on the South Coast of NSW, I am aware of many grounds on which to object to the Vickery Extension Project. Most of these concerns will undoubtedly be covered by others, such is the feeling against the mine in the Narrabri/Boggabri district. My objection is confined to the cumulative impacts of the project, as it is an area in which I have some knowledge, being a former Board Member of the Namoi Catchment Management Authority. It also reflects the limited time made available to review the EIS and prepare a submission.

The Secretary's Environmental Assessment Requirements state, amongst other things, that

In particular, the EIS must include:

- *a full description of the development, including:*
  - *the likely interactions between the development and any other existing, approved or proposed mining related development in the vicinity of the site*

- *an assessment of the likely impacts of the development on the environment, focusing on the specific issues identified below, including*
  - *an assessment of the likely impacts of all stages of the development, including any cumulative impacts, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice*

Interactions between the project and other developments have been addressed, at best, in an extremely cursory manner. In Section 2.3 the EIS addresses each neighbouring development in turn, noting what, if any, interactions shall occur. In most cases, the EIS suggests that there will be no interaction, or refers simply to shared coal transport facilities.

This cursory treatment might be acceptable if the interactions were properly covered by a comprehensive cumulative impact assessment as required under the second point above. Unfortunately, cumulative impacts have not been correctly assessed using the tools available.

Rather than a comprehensive cumulative impact risk assessment, the cumulative impacts have been assessed as an add-on to various topics in Section 4, namely:

- groundwater
- surface water
- noise
- air quality
- biodiversity
- traffic
- visual character
- aboriginal heritage
- historical heritage.

Given that the SEARs call for *"an assessment of the likely impacts of the development on the environment, ….. , including any cumulative impacts",* a major assessment of all mining developments in the area on the natural environment, including biodiversity, would be anticipated. However, the EIS provides, at best, only a couple of paragraphs at the end of each of the above topics. Under Biodiversity, cumulative impacts are not considered at all. In this sub-section, the EIS refers only to the impact of the Extension Project.

It is not as if the proper tools are not available for a proper assessment. The NSW Government provided considerable funds to the Namoi Catchment Management Authority in 2011 to develop the Namoi Cumulative Risk Assessment Tool (NCRAT).* NCRAT was developed specifically to assess the cumulative impact of mining scenarios on bioregional assets in the Namoi Catchment, in which the project lies, and considers any mining scenario, be it a combination of one of more mines including open cut mines, long wall mines and coal seam gas operations. It quantifies the risk of cumulative impacts across ten natural resource assets in the Catchment, namely:

- Land use
- Soils
- Carbon
- Surface water
- Groundwater
- Vegetation extent
- Vegetation type
- Vegetation condition (intactness)
- Vegetation connectivity
- Threatened species.

NCRAT is designed to:

- analyse the cumulative impact of a scenario across a number of asset sensitivity surfaces
- call on respective risk tables that associate sensitivity and likeliness/magnitude with risk, and
- produce a risk report that includes maps, area statistics, single and cumulative risk diagrams, and statement about specific assets impacted.

In other words, NCRAT is an ideal tool for assessing the cumulative risks associated with the project with respect to the natural resources of the region. It actually assesses the risk to natural resources should the project proceed, and gives a clear picture as to whether these risks are acceptable. NCRAT is housed in the North West Local Land Services office as well as the office of the Independent Expert Scientific Committee.

Why has this tool not been deployed? It is up and running with personnel trained to run it.

The project should not receive further consideration until NCRAT is deployed to assess the cumulative risks of the development to the natural resources of the region.

Reference: *Eco Logical, 2012. Assessing the cumulative risk of mining scenarios on bioregional assets in the Namoi Catchment: Development and Trial of an interactive GIS tool. Prepared for Namoi Catchment Management Authority.