

Submission objecting to the Vickery mine extension
Marie Flood, 110 Belmont Street, Alexandria 2015

As a former resident of the North West NSW I submit that the Vickery mine extension Environmental Impact Assessment **should be rejected**.

I have only had a short time to make this submission, and I believe that the submission period has been far too short to ensure that the best possible submissions are available to the assessment process for this massive development proposal. 90 days should be the minimum time allowed. Given more time I could have prepared a more comprehensive response.

My central concerns are that

- this extension would put the Namoi River and its critical contribution to the region at severe risk, along with other water systems.
- The extension would threaten the health of the local populations and the already endangered native species. The area and its population have been under siege for years from the air and noise pollution of nearby mines. The impacts of the nearby mines need to be considered together with this extension, and an assessment done of the current impacts on the community and native species.
- The company is proceeding without due regard to the cumulative impacts of the extension in an area already decimated by the Maules Creek and Leard Forest mines.

Social and Health Impacts

Social impacts of the mine include the health and well-being of the local community, who are already heavily impacted by dust, noise, sleep disturbance and loss of quality of life. The company has ignored this even though there have been a huge number of objections to the other mines and their impacts on health.

The Social Impact Assessment does not refer to the growing evidence about rising bronchial ill-health in Boggabri and Narrabri towns, reported anecdotally by GPs, and is consistent with health problems in the Upper Hunter Valley. The reported increase in bronchial medications has occurred since the time of the Maules Creek mine, and Boggabri extension. The fact that the recently established Namoi Air Quality Monitoring System does not incorporate dust monitoring in or near the town of Boggabri is a very bad decision.

Mental health

The SIA makes much of the fact that “anxiety” is a national problem. However, I believe that anxiety in coal-affected communities is based on real triggers that emanate directly from the coal mining industry. Examples include:

- The threat of loss of livelihood and property rights
- Dividing neighbour against neighbour is a common tactic of Project Delivery personnel to break down a bloc of landowners who deny access to their land

- Night-time noise and sleep disturbance is bound to result in some anxiety

Therefore, to blame the anxiety in coal-afflicted communities on a general national mental health problem fails to properly assess mental health impacts of the Vickery coal mine itself on the local community.

Loss of farming families from the region

Over 70 farms have been sold to coal mines in the area around the Boggabri and Maules Creek region. This has caused leakage of long-term resident population and replaced them with tenants in the most part, many of whom do not bring their families with them. Many more tenants are employees of the mines, and do not farm. Farming land is either grazed by arrangement with other parties, or left unfarmed, often because the property has been deemed a biodiversity offset.

Community groups such as the NSW Rural Fire Service, the Country Women's Association, Meals on Wheels, etc suffer due to the decline in permanent residents.

This has led to a downward economic spiral in Boggabri.

Employment forecasts unreliable due to the prevalence of drive-in, drive-out workers

It is a well-observed fact that even mine staff who have an address in Boggabri are Drive-in, Drive-out workers. They tend to leave their families in places such as the Hunter Valley towns, and commute weekly to their work. This has not been addressed in the SIA. Boggabri has not received an influx of population, and Whitehaven are understood to encourage workers to live in Gunnedah instead, adding to road traffic.

Threats to Boggabri

Boggabri is a town in slow decline, despite the assurances that were made by the coal industry when the Maules Creek mine was being proposed that prosperity would come.

Despite strong support in the community for a dust monitor in the town of Boggabri, which is supported by Boggabri Coal (Idemitsu Resources), Whitehaven has opposed this plan. Although a Dept of Planning representative recently blamed this on the NSW EPA, there is written evidence that Whitehaven refused to support the Boggabri dust monitor unless it were paid for by the NSW Government.

Businesses in Boggabri have not seen the benefit from decade of coal mines, if anything the reverse has happened. Only one pub out of three remains in operation.

Noise

The Noise Impact Assessment has extremely significant ramifications for the surrounding community, with impacts that will extend to the town of Boggabri, based on my knowledge of other coal-affected towns such as Wollar and Bulga, which are being gradually depopulated due to mine encroachment and noise issues.

The construction of a coal handling and processing plant at the Vickery coal mine is an additional threat, as it will produce unacceptable levels of low-frequency noise. This is well-known to occur, and is well-documented that CHPPs produce highly disturbing noise in the 16-25Hertz range. Whitehaven's Maules Creek coal mine has intractable noise problems at the 50 Hz frequency.

In addition, the Noise Impact Assessment is lacking an All Years Worst Case Scenario, and fails to include key noise producing infrastructure in its modelling.

I do not find it credible that the 10 MTPA mine will be quieter than the 4.5MTPA version that was previously approved in 2015.

Coal railway and rail loop

No modelling has been provided as to the movement of surface water once the railway were to be constructed, and inadequate details of the construction of the 14 km rail spur. There are inadequate indications of what sections will be elevated, and which will be embankments.

"The final vertical alignment of the rail and the sizing of the openings (bridges and culverts) will be determined during the detailed design stage."- *Appendix C Flood Assessment, page 38.*

This has very serious ramifications for flood risks and makes it impossible for anyone to make an informed submission.

Further, according to the Dept of Planning, "this is a flood modelling much different than other developments .. without explicitly stating where each structure is.... It's certainly a key issue." [Source: Stephen O'Donoghue, Team Leader, Resources Assessments, Golf Club meeting 26th Sept 2018]

I do not have confidence in modelling which is based on such vague assumptions, with no details about where each structure is.

The rail loop itself is particularly too close to the Namoi River and the riparian vegetation and koala habitat will be lost.

The community has been living under the assumption that there would be no Namoi River crossing associated with this project, since Whitehaven Coal was advised the Commonwealth of the Environment that a river crossing would not be acceptable under the *Environmental Protection and Biodiversity Conservation Act*.

The coal railway is one of the most serious concerns about this Vickery project.

Biodiversity – koalas

The entire locality where the Vickery mine is intended to be built is prime koala habitat, including the area where the rail loop is to be built.

Koalas are listed as an endangered species under NSW and Commonwealth legislation. I do not believe that any mitigation measures, such as relocation of the local koala population can be viable because alternative habitat is being destroyed throughout NSW and in any case relocating koalas is known to have a high failure rate.

Impacts on the Koala have also been understated because of insufficient consideration of impacts upon the full extent of suitable habitat within the Approved Mine area. Like other cumulative impacts, the effects on koala habitat have been dealt with poorly in the EIS. There does not seem to be any limit of the extent of impact being considered and matters in relation to landscape impacts have not been considered adequately.

Right now, some of the most important and large nearby koala habitat, being Vickery State Forest and Leard State Forest are either being actively destroyed by coal mining, or else they are slated for destruction in the medium-term.

Road Transport

The Road Transport Assessment uses survey data collected in 2012 which is outdated. It predates the establishment of the Maules Creek coal mine, the extension of the Boggabri and Tarrawonga mines.

There has not been a thorough assessment of road usage or an up-to-date road traffic audit identifying cumulative impacts.

Road transport since 2012 has grown dramatically, including mine workers, transportation of heavy plant and equipment, and increased road haulage of coal from Tarrawonga mine which gained approval subsequent to 2012. These are not accounted for in the Vickery Road Transport Assessment.

Since 2010, the Dept of Planning has continued to approve increases in truck movements on the Highway from 2MTPA to 3MTPA to 4MTPA, rather than building the Kamillaroi Highway overpass as promised.

I believe there should be no new coal on the Kamillaroi Highway.

Water trigger legislation

This Project is a controlled action under the *Environmental Protection and Biodiversity Conservation Act*, and is a “large coal mine” under the terms of the EPBC Act.

This EIA does not provide an adequate amount of detail to enable decision-makers at the State or Commonwealth level to properly assess the likely impacts of the mine, and the railway, on the Namoi River, and the surrounding surface-water and groundwater.

Elsewhere, the EIA provides factually inaccurate or incomplete information which may a tendency to be misleading.

I do not have confidence that the Namoi River is safe from severe damage if this mine proceeds, and fear that water quality and downstream flows will be damaged to the detriment of downstream users.

Indigenous culture

From the experience of the Maules Creek mine, Whitehaven continually ignore their responsibilities in relation to cultural heritage as it is set out in the Burra Charter and the Policies relating to Aboriginal Cultural Heritage Valuations set out by the Office of Environment and Heritage. There has been a lack of any consultation with the First Nation's People's Knowledge Holders, within the Red Chief Local Aboriginal Land Council boundaries. Consulting with Registered Aboriginal Parties is not enough.