

## **Submission to the Department of Planning and Environment**

**Vickery Extension Project** 

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## **NSW Farmers' Association Background**

The NSW Farmers' Association is Australia's largest State farmer organisation representing the interests of its farmer members – ranging from broad acre, livestock, wool and grain producers, to more specialised producers in the horticulture, dairy, egg, poultry, pork, oyster and goat industries.

The NSW Farmers' Association (NSW Farmers) appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed expansion to the Vickery Coal Mine located near Gunnedah, NSW. We have a number of concerns with the development, particularly around the impacts to neighbouring landholders and the close proximity to the Namoi River.

NSW Farmers is Australia's largest state farming organisation, representing the majority of commercial farm businesses in NSW, ranging from broad acre, meat, dairy, wool and grain producers, to more specialised producers in the horticulture, egg, pork, oyster and goat industries.

The proximity of the Vickery Extension Project to the Namoi River and the associated floodplain presents a range of worrying potential impacts. The EIS lacks sufficient detail relating to the potential risks associated with the expansion of the mine on floodplain areas and the impacts on the associated water resources of the Namoi River, tributaries and aquifers. It is critical that the proposed Vickery expansion does not cause or contribute to adverse impacts to the water resource in particular, but not limited to, altering flood risk, up-catchment flows, aquifer storages and water quality.

Additionally, the EIS provides limited engineering details in relation to the construction of the rail spur over the Namoi River and floodplain areas. The construction of the rail spur has the potential to affect water movements (including surface water and river flows), therefore detailed analysis of these impacts and associated risks must be taken into consideration. The accumulation of flood debris against the construction also has the potential to increase flood levels, which may contribute to the flood risk in Gunnedah, especially in areas already prone to flooding. Changing variability in climate may also see increasing intensity and frequency of rainfall events. This needs to be considered in flood risk assessments over the life of the project.

A number of nearby landholders have raised concerns about the likely creation of dust and noise disturbance during the construction and production phases of the proposed expansion. NSW Farmers acknowledges the efforts taken to model and develop strategies to minimise the potential impacts on nearby landholders, although there are perhaps still questions as to their accuracy and applicability in a real word setting. With the mine expansion more than doubling the size of production and the proposed expansion area being in closer proximity to landholders, these landholders and the wider community must be assured that the creation of dust and noise pollution will be minimal.

In respect to the EIS of the Vickery Expansion Project, we seek additional information about the details of the expansion project, in particular the construction of the rail spur and the close proximity of the expansion to the Namoi River and associated floodplain and the risks this imposes on the water resource. We also seek an extension to the exhibition period from 42 to 90 days to allow for landholders and stakeholders to analyse the extensive documentation, seek expert advice and consider the proposal.

Overall, we appreciate the opportunity to comment on the EIS for the Vickery Expansion Project and strongly believe that the best outcomes will be achieved if the concerns of landholders are genuinely considered alongside other stakeholders.