

Submission

We have considered the Vickery coal mine extension Environmental Impact Assessment (EIA) and believe it should be rejected, for the reasons set out below. Although we do not live in the region directly affected by the proposed extension of the mine we are concerned about several aspects of the assessment of this State Significant Development (SSD), namely: the loss of agricultural land and the effects on food production; the unacceptable risks coal mining poses to containing global warming; the risks to the health of communities in the affected region; and the risks to the environment generally and to endangered native animal habitats in particular.

1. Inadequate public exhibition period and opportunity to comment

The short public exhibition period means that we are unable to provide the kind of detailed response which the size and complexity of the proposed Vickery Coal mine extension demands. The failure to provide adequate time to consider all the implications of the proposal has compromised the general NSW community's right to comment on this important SSD. We object to the decision by the Minister for Planning to refuse an extension of 90 days to the public exhibition. An extension would have allowed more expert consideration and community comment.

2. The EIA fails to consider the social and health effects of other mines and mining proposals in the area

The Vickery coal mine is 18 kilometres south of the town of Boggabri. The proposed 10 million tonnes per annum (MTPA) for the Vickery mine is close to the Leard Forest coal mining precinct and will create another mega mine on the scale of Maules Creek. The Vickery mine is surrounded by other exploration licences, including a licence which covers the Vickery State Forest. It is highly likely that these will be the subject of mine applications in the future. The Gunnedah Basin, in the Boggabri region, is also the location for 22 MTPA of approved coal mining.

The EIA wrongly states that Vickery and Tarrawonga are 11 kilometres apart when in reality Tarrawonga is only 4 kilometres from the proposed Vickery bore field. Local communities are already badly affected by blasting vibrations and dust from Whitehaven's Rocglen and Tarrawonga mines but the EIA does not mention this.

It is disappointing to see that the EIA makes no attempt to consider the real risks to local communities caused by the cumulative impacts of existing mining activities and explorations. In view of the existing concerns about dust from the Leard Forest coal mines, it is clear that the EIA does not adequately assess the cumulative impacts of dust pollution and other risks to the health of communities in the Gunnedah Basin posed by any extension of the Vickery mine.

3. Social Impact Assessment

Social impacts of the mine include physical and mental health and well-being of the communities concerned. According to the Social Impact Assessment (SIA), existing local mining operations formed part of the basis of assessment. But many impacts were not quantified, for example, the SIA completely ignores the disturbing effects of mining noise on sleep and quality of life. These effects are widely known as a result of the objections lodged by many Boggabri and Maules Creek residents to the Maules Creek noise modification proposals in 2017.

a. Noise Impact Assessment (NIA)

The NIA is extremely significant for the surrounding community, with impacts that will extend to the town of Boggabri. We understand that the construction of a coal handling and processing plant at the Vickery coal mine will produce unacceptable levels of low-frequency noise. It is well-documented that coal handling and preparation plants (CHPPs) produce highly disturbing noise in the 16-25 Hz range. Whitehaven's Maules Creek coal mine has intractable noise problems at the 50 Hz frequency.

In addition, the NIA assessment does not include an All Years Worst Case Scenario, and fails to include key noise producing infrastructure in its modelling.

The implication in the EIA that the 10 MTPA mine will be quieter than the 4.5 MTPA version previously approved in 2015 is simply not credible.

b. Physical health

The SIA ignores the growing evidence of increasing bronchial ill-health in Boggabri and Narrabri towns, reported by general medical practitioners. These effects are consistent with health problems in the Upper Hunter Valley. The reported increase in prescribed bronchial medications has occurred since the operation of the Maules Creek mine and Boggabri extension. It is very disappointing that the recently established Namoi Air Quality Monitoring System does not incorporate dust monitoring in or near the town of Boggabri.

Despite strong support in the Boggabri community for a dust monitor in the town, and support from Boggabri Coal (Idemitsu Resources), Whitehaven opposed it. Although a Department of Planning representative recently blamed this on the NSW Environment Protection Authority, we understand that there is written evidence attesting that Whitehaven refused to support the Boggabri dust monitor unless the NSW Government paid for it.

c. Mental health

The SIA refers to "anxiety" being a national problem, but does not seriously consider anxiety in communities caused by the coal mining industry. Examples include:

- threats to livelihood and property rights;
- disrupting communities and dividing neighbours, with project personnel seeking to break down the unity or solidarity between local landowners denying access to their land;
- the cumulative effects of noise and the resulting sleep disturbance caused by mining activities.

By seeking to explain away the anxiety evident in communities affected by coal mining, by referring to a national mental health problem, the SIA abrogates the Department's duty to assess properly the mental health impacts of the Vickery coal mine on the local community.

d. Farming families leave the region, replaced by drive-in, drive-out workers

In the Boggabri and Maules Creek region more than 70 farms have been sold to coal miners. These long-term residents have left and been replaced mainly by tenants, many of whom are employees of the mines, not farmers. Farming land is then grazed by arrangement with other parties, or left unfarmed, often because the property has been deemed a biodiversity offset for the mines.

Mine staff who have an address in Boggabri are mainly drive-in, drive-out workers who commute weekly to work and whose families tend to live in Hunter Valley towns. Boggabri has not received an influx of population and we understand that Whitehaven encourage workers to live in Gunnedah rather than Boggabri. The NSW Rural Fire Service, the Country Women's Association, Meals on Wheels and other community groups have suffered due to the decline in permanent residents but the SIA ignores these social impacts.

4. Economic impacts on Boggabri

The social impacts described have led to a downward economic spiral in Boggabri, despite the assurances of future prosperity made by the coal industry when the Maules Creek mine was proposed.

Loss of population results in empty houses. This is exacerbated by the Boggabri Village mine workers' camp located outside the town, operated by the multinational company CIVEO ("a global workforce accommodation specialist").

Boggabri small businesses have not seen any lasting benefits from decades of coal mines: if anything the reverse has happened. Only one pub out of three remains in operation. The benefits to Boggabri from the CIVEO workers' camp are overstated, for example, we understand that CIVEO does not patronise the Boggabri butcher, preferring to buy meat from elsewhere.

There is no child care centre, which is a disincentive to young families who may wish to relocate there. We understand that Whitehaven Coal approached Narrabri Council and advised them not to invest in child care in Boggabri. Community bitterness surrounding the child care centre is very distressing to the Boggabri Business and Community Progress Association, which is working to secure the survival of the town.

5. Environmental impacts of the proposal

a. Coal railway and rail loop

The EIA provides no modelling about the movement of surface water from the railway and inadequate details of the construction of the 14 kilometre rail spur. There are inadequate indications of which 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, p 38.*

This has serious implications for flood risks and makes it impossible for anyone to make an informed submission. Modelling based on vague assumptions, with no details about where each structure will be is not worth the effort and provides no information on which to base informed comment.

The rail loop appears to be too close to the Namoi River and will result in the loss of riparian vegetation and koala habitat.

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

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

b. Biodiversity - impacts on koalas and the environment generally

Koalas are listed as an endangered species under NSW and Commonwealth legislation. We do not believe that any mitigation measures, including relocation of the local koala population, are viable, because alternative habitat is being destroyed throughout NSW. Relocating koalas is already known to have a high failure rate.

The EIA understates the impacts on the koala population because it does not adequately consider the full extent of suitable habitat within the approved mine area. Some of the most important, large koala habitat in the Vickery State Forest and Leard State Forest are either being actively destroyed by coal mining, or they are slated for destruction in the medium-term. The EIA does not seem to give any consideration to limits on the extent of such impacts. In our view the EIA has not adequately considered impacts on the landscape in general, and for koalas in particular.

c. Road transport

The Road Transport Assessment (RTA) uses outdated survey data collected in 2012. This predates the establishment of the Maules Creek coal mine and the extension of the Boggabri and Tarrawonga mines. The RTA therefore does not provide a thorough assessment of road usage or an up-to-date road traffic audit identifying cumulative impacts.

We understand that road transport since 2012 has increased dramatically, including mine workers, transportation of heavy plant and equipment, and increased road haulage of coal from Tarrawonga mine which gained approval after 2012. These are not accounted for in the Vickery RTA.

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

For the sake of local communities and the environment we believe there should be no increase in coal traffic on the Kamilaroi Highway.

d. Risks to the Namoi River

The Vickery mine poses the risk of irreversible or catastrophic harm to the Namoi River, its surrounding surface water and groundwater systems; the health and well-being of human populations in the Boggabri region; and to the habitat of the endangered koala and the Murray Cod.

The mine is a controlled action under the *Environmental Protection and Biodiversity Conservation Act* and is a "large coal mine" under the terms of that Act.

The EIA does not provide enough details 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.

We are not confident that the Namoi River is safe from severe damage if the mine proceeds, and fear that water quality and downstream flows will be damaged to the detriment of downstream users.

e. Indigenous cultural heritage

We understand that in operating the Maules Creek mine Whitehaven has continually ignored its responsibilities in relation to cultural heritage, as set out in the Burra Charter, and the Policies relating to Aboriginal Cultural Heritage Valuations set out by the Office of Environment and Heritage. We understand that there has been no consultation with the First Nations People's Knowledge Holders within the Red Chief Local Aboriginal Land Council boundaries. Consulting with Registered Aboriginal Parties is not enough. We are not confident that Whitehaven will meet its responsibilities in this regard if the Vickery mine extension is approved.

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