

The National Parks Association NSW (NPA) was established in 1954 and the Armidale Branch formed in 1974

We are a not for profit organisation, working with community to protect nature.

We respectfully request that the NSW Government rejects the Vickery mine extension EIS.

We have rural members living throughout north western NSW, some of whom are being directly and adversely affected by the expanding proximity of coal mines.

- **Long term inter-generational viability of coal mines versus agriculture :**

There is a threat to the long term viability of essential sustainable agricultural businesses and the associated long term well being of communities and economics of local towns such as Boggabri.

The NSW Planning Process is not adequately addressing this issue.

- **Health :** Local residents are suffering from physical respiratory and mental health concerns relating to the impacts by vibrations from mining explosions, noise, dust, pollution and increased vehicular truck movements. As stated previously, there are real people suffering from the cumulative effects of expanding coal mines in this area. There is inadequate attention directed at these concerns for example, the Namoi Air Quality Monitoring System does not incorporate dust monitoring in or near the town of Boggabri.

The EIS does not adequately address these serious issue

- **Vehicular Movements :** Road transportation of heavy plant and equipment, and increased road haulage of coal road transport since 2012 has grown dramatically, including mine workers, from Tarrawonga mine which gained approval subsequent to 2012.. 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.

These are not accounted for in the Vickery Road Transport Assessment

- **Noise :** The Noise Impact Assessment has vitally important ramifications for the surrounding community. 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.

There is failure to adequately address the issue of noise

There are major environmental concerns **regarding ground water and impact on native flora and fauna** such as endangered koala populations and the Federally listed Murray Cod.

- **Koalas** are listed as an endangered species under NSW and Commonwealth legislation.

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.

- **Replacing destroyed ecosystems and habitats.** Large areas of natural habitat are being destroyed and these cannot, according to scientific research and reports by botanists, be compensated by 'off-sets' as delicate and **complex native vegetation communities and ecosystems cannot be constructed or re-created.**

The EIS fails to prove scientifically and in practical that offsets really can accurately and fully recreate complex native ecosystems and specific vegetation communities.

- **Water :** 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.

There is not sufficient or accurate or complete information regarding the protection of water, vital for the on going well being of agricultural endeavours of the area.

We are concerned to keep Namoi River water intact & protected from severe damage if this mine proposal proceeds, and are very concerned that the water quality and downstream flows will be damaged to the detriment of downstream users.

Water issues are inadequately addressed by the EIS

Consultation : Many in our communities are concerned with the inadequate period of time allowed for responses to such a large and potentially devastating development.

Therefore this submission we feel is not as detailed as we would wish and Armidale NPA requests an extension of time be given to public responses to the Vickery Extension Project.

We are aware that many diverse sectors of the community have expressed real and personal concerns with regard to the natural environment including water resources, to poor health suffered by many local residents, to the long term sustainable viability of farming lands, to the destruction of cultural heritage and therefore the NSW Governments Planning & Environment EIS process is inadequate.

We trust that the NSW Government, the NSW Department of Planning will listen to the genuined concerns of the rural residents and communities. **Thank you.**