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State Significant Development Assessment
Rixs Creek Continuation of mining project (SSD 6300)

The assessment of the NSW department of planning report May 2018

Note: On assessment of the report provided by the department of planning, that I do not hold a degree in environmental science or economics.

The qualifications I hold is an electrician, recently maintenance planning, with 37 years experience in the energy industry.

So therefore, the information provided is concerns within the report and the perceived perception of impacts on the village of Camberwell and especially private landholders.

On reading the document the NSW department of planning has used the wording prediction on several occasion. Looking at the definition of the word "A prediction is what someone thinks will happen. A prediction is a forecast, but not only weather. Pre-means before and diction has to do with talking. It's a guess, sometimes based on fact or evidence but not always.

The interpretation of the documents is difficult when considering the use of the term prediction and will this be correct related to the impacts experienced or future impacts that might not be correct and the legacy the future generations receive could far greater than predicted.

Cumulative

On page 3: there is 18 operational mines in 10km radius of Rixs creek operation and the mine will be 3km Southeast of Camberwell

The concern the report failed to identify the Southeast open cut mine of Ashton(Yancoal) has not commenced operation due to the LEC merit appeal but has approval, also the premise has lodged a modification to the department related to commencement and changes to the acquisition rights of the privately-owned villagers

Also, that concern that Glencore Glendell mine has started proceeding in producing an EIS for the continuation of the mine, which will impact the historical significant Ravensworth homestead, if approval is granted and could be operational in five years, the impacts on the Camberwell

Another significant issue is the approval of the hunter valley operation mountain of overburden, which could have the potential changing airflows from the south-east of the village due the geological changes to the valley floor

Another significant issue is the height of the Ravensworth West supper pit, the mountain in the construction now is considered from viewing out of the Camberwell SS on the New England highway is at the height of the Bayswater cooling towers, which also has the impact of changing the structure of the valley floor and possibility air flow conditions.

The report has not considered future modifications of other 18 operational mines in the area and the impacts this will have on the geological structure of the valley floor which have the predicted

outcome of changing air-flows, weather patterns and air quality on certain receivers in the area especially Camberwell.

The impacts related to the south-east of the village of Camberwell, with two mines Rixs creek and Ashton SEOC operating has the perceived potentially of causing harm to the occupants in the village through exposure of high levels of particulate matter and noise.

Since the commencement of the UHAQM in the village of Camberwell the OEH has provided air quality exceedance alerts, with offer to register to receive these alerts.

On registering in 2012 the cumulative impacts received in this village over the last five years are;

2012 – 34 alerts from 15/8 to the 31/12

2013 – 64 alerts

2014 – 29 alerts

2015 – 22 alerts

2016 – 26 alerts

2017 – 56 alerts

2018 to date 17 alerts

Now Integra operation closed operation and placed the mine in care and maintenance, until the purchase by Glencore and Bloomfield, in which the premise has commenced operation. The increase in the last year could be potentially related to the operation resumption or climatic changes. But highlights the concerns related to the dust stop program and mitigation of vast areas of exposed areas.

So therefore, the potential increase related to cumulative air quality exceedances are expected in the village of Camberwell, in which the health department states in the letter 8th December 2016 “note there is no evidence of a threshold below which exposure to PM is not associated with health effects”. The risk consequences would be the potential increase of air quality exceedances due to two more operating mines in the south-east would and the flow on effect of exposure above of the perceived perception of over four months a year or greater, so therefore the village health and safety is compromised.

As stated on Page 28 in the report Direction of the mining would progress towards Camberwell, impacts on Camberwell will increase.

On Page 16 NSW Health “noise can have a negative impact on human health”

The cumulative impact related to the operation noise related to SEOC and Rixs Creek project, plus the New England Highway in the vicinity of the village had difficulty to locate and at this stage could not find any context this concern, the high volume of traffic movement at certain times especially commencement of shifts and knock off times increase the noise movement, and the structural shape of the village increases the level and then add two operational mines to the southeast this would have a negative impact on health. Even with mitigation to the premise the level is above the acceptable level to occupant on their perception, which negates stress and entrapment.

Page 36 Cumulative Noise

The statement "Prevailing winds would be unlikely to lead cumulative noise impacts"

The mine is unable to reduce its existing noise levels to meet desirable PSNL, it is committed to noise reduction.

So therefore, how is the mine going to regulate the New England Highway, number of operating mines to reduce noise levels, as stated before noise has a negative impact on human health, so therefore do the mine have the right to operate when they are unable to reduce the noise levels is the perceived perception on the wording.

Page 32 of predicted exceedances related to noise, it which they offer vacant land acquisition rights and the perceived perception unable to unable to reduce noise levels for others, this does not make procedural logic is the perception.

Page 40 Cumulative Impacts of blasting

Cumulative effects of blasting concurrently with neighbouring mines was not considered in the BIA.

Is this acceptable outcome from a departmental assessment in relation to hazard generation and risk to health and safety of the public, so therefore two mines blast at the same time SEOC and Rixs creek that the village of Camberwell is not protected against actions associated with the application, due to the potential failure to investigate the potential harm to the village which is already under stress from poor air quality, and that a sudden exposure of high levels of PM which there is no safe levels could have the possibility impact the longevity of life to the occupants.

Predicted surface water impacts page 42

There will be 160 hectares lost from the catchment, in which 140 hectares the internally draining void.

The final void would as a ground water sink, with inflows exceeding outflows, evaporation exceeding rainfall, this would produce a pit lake

Now the cumulative impact of thirty pit lakes in the region, looking through the report I was unable to locate the impacts on the upper hunter and the how this would be managed, regulated, monitored for the predicted 2,000 years when the water would be close to sea water, the amount of money set a side to compensate for loss of water or income, food production if the predicted final void behaviour is not correct and the climatic changes, surface water and underground water changes the voids to a flow through cell

There was no context which could be found on the cumulative impact of the land loss due to the 30 final voids in the upper hunter.

The prediction that the final void would fill in 100 years and stabilise, therefore the concern here is this correct and factual, or a guess. Could climatic conditions cause the pit lake to be fill in 2-10 years and how is this going to monitored and controlled.

Therefore, the concern arises that a final void should be removed from the application to due to harm it imposes on the environment, sterilisation of land and that the costs of maintenance, monitoring and the potential harm could impose on other uses of resources in the area and the contamination of those resources.

Within the department report there seemed to be no context to the predicted economic analysis of the final void maintenance, monitoring, classification of land with a final void, land value and what would be the rateable income from the said land, the reason why the void was classified as required as significant asset, also the costing of filling a void. The other concern which seemed not to be addressed was the potential land value of adjoining properties to this said land unclassified type with a final void that is rendered unusable. Please note the approval of the Hunter Valley Operation final void by the Planning Assessment Commission in which the proponent states the void is will be hypersaline and unusable.

Also, the departmental report "minor seepage into the groundwater system" and monitoring would be required and states that Bloomfield should prepare a groundwater monitoring and response plan.

So the interpretation that this is not mandatory and how is the department going to regulate, the other issue is how is the EPA going to manage compliance or licence for a final void that is hypersaline and unusable, what is the regulatory controls and how will they enforce protection of the taxpayer from undo costs if the applicant is not available for the life of the void.

The project predicted to have an economic benefit of approximately \$270 million through royalties', wage premiums and company tax of the executive summary of the department's report.

Now the recent announcement of the T4 in Newcastle and the outcomes of the PAC in 2009 approval, raises concern related to predictions

So therefore the concern here is this prediction covering all aspects and is this achievable

Factors that might not be considered.

Automation of the fleet and the reduction of employment to met shareholders expectation of income

Company tax cuts

The devaluing of coal in the future and the impacts on climate change relate to water availability for mitigation and coal handling.

The possibility of contracts for the coal been terminated to external markets are looking at other technologies for energy and innovation to reduce carbon

So therefore is the predicted forecast acieveable, but not for taking the costs in the future related to the depreciation of land, final void maintenance and if the land is a saleable product.

Social Impacts 6.8 of the document

The perceived perception that the report from Umwelt states there is no risk to human or the community, they looked at CCC minutes and complaints registers and spoke to stakeholders.

The department report states the social impact was not done under the new assessment guidelines.

Therefore the perceived perception has not met the criteria expected for a social impact assessment today and could be considered not covering all the concerns related to impacts experienced now related to risk to health especially in the Camberwell district.

6.8.3 Mitigation page 67

Where Bloomfield considers that the social impact of the project could be mitigated through implementing management and monitoring programs, as well as effective communication

1. Regular CCC meetings-

The CCC is an advisory structure in which the company provides the information, the community members cannot make management changes to the operation this a government department legislative requirement, therefore in relation to mitigation implementation and controls, please explain how a CCC member can change an operational mitigation control

Mitigation controls and compliance is government agencies responsibility to have a robust procedural process in place and policies that are effective to protect harm to others and the environment. Therefore the perceived perception with this departmental obligation that the community is provided with the tools and the skills to understand the processes and how to report incidents that cause harm and identify behaviour's that may deem to cause risk to health and safety.

Therefore concerns in the conclusion of the departments assessment has not addressed few concerns especially in related to impacts to the impacts on Camberwell. Also note Camberwell has no town water supply, and recently a letter from the Singleton council it will not be receiving a supply due to costs, also note several occasions the water in the tanks have been found to be grey in colour and has caused health issues.

The other concern is the Enforceable undertaking between Bloomfield and the department of planning in 2017.

From the undertaking

H. the department has been conducting investigation into allegations that Bloomfield has provided false and misleading information in the respect of MOP in years 2001, 2005 and 2013.

From the perceived perception on reading the enforceable undertaking on the government website, raises concern of the actual land disturbance and social fabric of the company, also the independent auditing system in place does this met the expectations.

Note the department has no independent auditor register and the proponent select the independent auditor.

In conclusion of the report using the term prediction raises a concern that my objection to the application remains and that Camberwell has not been assessed adequately and the impacts outweigh the benefits.