



environmentally concerned citizens of orange
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**The Independent Planning Commission
November 12, 2018**

Re: The proposal by Kepco Mining to establish a coal mine in the Bylong Valley.

Dear Sir/Madam,

I am writing to you on behalf of the Environmentally Concerned Citizens of Orange (ECCO), to express our opposition to the proposal to establish a coal mine in the Bylong Valley. ECCO is a community based not for profit organisation made up of volunteers committed to promoting environmental values. One of our aims is that of independent environmental advocacy.

We have several objections to the above proposal. , the first of which being the failure of the Department of Planning to consider the impact such a mine would have on the water availability in the area. The Bylong Valley does not have an abundant water supply, most which being currently allocated for agricultural production and environmental use. The additional demand of a mining operation which will require large amounts of water would put intolerable pressure on the available supply. In addition, groundwater is an important source in the valley and the affect of mining operations on the aquifers has not been adequately researched.

Situated in the Bylong Valley are important agricultural enterprises which take advantage of its prime agricultural land. Included is the internationally famous Tarwyn Park, which has pioneered the technique of natural sequence farming. This enterprise and other successful rural properties will be severely compromised, if not destroyed, if mining is allowed to proceed. The Bylong Valley has for many years been an important source of drought fodder, such as pasture and lucerne, which require a reliable water source. The resources of the valley will become more important as we are faced with more frequent and severe drought events due to the impact of climate change. It is therefore most unwise to compromise such a resource by the establishment of a mine.

There are significant natural heritage features contained within the precinct of the Bylong Valley and the neighbouring World Heritage listed Wollemi National Park. If mining is permitted, many of these unique features will be affected and potentially lost. Mining activity also threatens the region's aboriginal heritage , biodiversity and the community values and social cohesion of the area. Large scale mining operations such as the case in point have been demonstrated to place such pressure on neighbouring communities as to render them unviable,

The recent IPCC report which, ironically was handed don on the same day as the Bylong valley final assessment report, categorically states that if we are to keep global warming to below 1.5 degrees coal must be phased out by 2030. To increase coal production in the face of such clear

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advice to the contrary could be considered at best rash, and at worst criminal, as such a decision would result in yet another contribution to catastrophic global warming.

News South Wales Government policy states that *“The NSW Government endorses the Paris Agreement and will take action that is consistent with the level of effort to achieve Australia's commitment to the Paris Agreement.”* Agreeing for a mine to proceed which has a life span up to 2044, during which time exporting millions of tonnes of carbon pollution could hardly be described as being in the spirit of the Paris Agreement, nor does it reflect NSW Government policy on the issue. Endorsing such an enterprise would appear to fly in the face of any agreement to reduce carbon emissions.

The proposal does not include a clear cost benefit analysis of the proposed mine. There has been no attempt to quantify the profit gained from the mine as opposed to the loss of long term environmental, social and economic assets caused by the impact of mining in the valley. Loss of agricultural land will be considerable, consisting of a direct loss of 400 hectares, which will have little prospect of rehabilitation once mining has creased. Included are 65 hectares of critically endangered habitat which cannot be realistically offset.

It has been recognised that subsidence will be a problem, but the extent of this has been underestimated . The largest biodiversity offset is within the mine subsidence area, which is obviously inappropriate..

The area in question falls within the range of the critically endangered Regent Honeyeater. A major reason for its critically endangered status is that of habitat destruction. Habitat removal by this mine, should it proceed will contribute further to the removal of this bird's habitat, representing another threat to its already precarious hold on existence. There is no recognition or assessment of the impact of habitat removal on the Regent Honeyeater population within the affected area.

ECCO would like to thank the Commission for the opportunity to comment on the above proposal. We are unable to give it our support. Further we find it incomprehensible that mining such a beautiful agriculturally productive area could even be considered, especially at a time when the world is turning away from coal in favour of renewable alternatives, and that we have been given a clear warning that if we are to avoid catastrophic global warming we must cease our dependence on fossil fuels as a matter of urgency.

Yours sincerely
Nick King
president ECCO Orange Inc.

