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14 November 2018

**EXPERT WITNESS SUBMISSION ON SOCIAL IMPACTS:
BYLONG COAL PROJECT**

1. This submission relates to the social impacts of the proposed Bylong Coal Project. I have been requested by EDO NSW to provide this report to the Independent Planning Commission (IPC). The EDO has specifically asked me to: (a) provide advice on whether the expert opinion expressed in my original submission to the Project Assessment Committee (PAC) has changed as a result of the additional Revised Project Information; and (b) provide any further observations or opinions, which I consider to be relevant.
2. I, Dr Hedda Haugen Askland (Cand.Mag, MSocSc, PhD), have read Division 2 of Part 31 of the *Uniform Civil Procedure Rules 2005* (UCPR) and the Expert Witness Code of Conduct in Schedule 7 of the UCPR and I agree to be bound by it. I wish to reiterate that I do not act as an advocate for either party and that any opinion expressed is based on my professional training, knowledge and experience.
3. I declare that I have made all the inquiries which I believe are desirable and appropriate (save for any matters identified explicitly in the report), and that no matters of significance which I regard as relevant have, to my knowledge, been withheld.
4. I am a qualified social researcher and have been working with local coal-affected communities in New South Wales (NSW) since 2015. I am employed as a Senior Lecturer at The University of Newcastle, where I am conducting a long-term ethnographic research project with mining-affected communities in the Upper Hunter, Mid-Western and Mid-Coast Regions of NSW. Bylong is one of

the case study areas for this project, which explores issues of migration, resettlement and displacement in the context of mining.¹

5. My original submission was based on my review of the Social Impact Assessment (**SIA**) developed by Hansen Bailey for the Proponent, and the Peer Review commissioned by the NSW Department of Planning and Environment (**DPE**) and developed by Elton consulting, as well as KEPCO's response to the Peer Review. In addition, I reviewed the Response to Submissions (**RTS**), the SIA No Worker Accommodation Facility (WAF) Scenario, the Workforce Accommodation Stud, Supplementary Responses to Submissions, and the DPE Preliminary Assessment Report. For the purpose of this submission, I have further reviewed the Bylong Final Assessment Report, including Appendix 6 (Supplementary Information: Response to Askland pp 55-58 of 128) and Appendix 9 (Response to PAC Submissions, Social pp 15-16 of 45), KEPCO's Response to PAC Review (Main Report and Appendix D – Preliminary Impact Management Plan), and the DPE Recommendation's to IPC (Bylong Final Assessment Report and Bylong Recommended Conditions to IPC).

EXECUTIVE SUMMARY

6. I maintain my original opinion that the SIA process for the proposed Bylong coal project and its assessment by the DPE have been consistently flawed and inadequate.
7. Based on review of the various documents outlined above (4), in my view:
 - i. the original SIA produced by the proponent was inadequate;
 - ii. the preliminary Social Impact Management Plan (**SIMP**) produced by the proponent and now before the IPC is inadequate;
 - iii. neither the SIA nor the SIMP are in line with the DPE's own Social Impact Assessment Guidelines; and,
 - iv. the SIMP cannot replace an actual Social Impact Assessment. A SIMP does not provide the grounds for assessment without an adequate Social Impact Assessment having first taken place.
8. In light of the documents reviewed, I maintain my opinion that the social impacts of the proposed project have not been adequately assessed and that the mitigation and management strategies proposed are insufficient. The rationale underpinning this conclusion is outlined in detail in my

¹ This project has been through a thorough review in line with the National Statement on Ethical Conduct in Human Research issued by the Australian Government National Health and Medical Research Council. It has been reviewed and approved by The University of Newcastle Human Research Ethics Committee, Approval Number: H-2015-0279.

original submission to the PAC dated 17 May 2017 (**Original Submission**) (attached at **Appendix A**), with additional comments on the Revised Project Information provided below.

9. In section 1.0, I offer comments on the responses to my original submission and state that the concerns outlined in my original report remain valid and my expert opinion has not changed. In section 2.0, I offer some further observations, particularly as these relate to the SIMP.

1.0 RESPONSE TO ORIGINAL SUBMISSION

10. In my Original Submission, I found that:

- i. The social impacts of the Bylong Project have not been adequately assessed. Shortcomings include:
 - inconsistency between the SIA and the Secretary's requirements (as outlined in the Secretary's Environmental Assessment Requirements, pages 3-4);
 - shallow analysis and insufficient assessment of cumulative impacts;
 - failure to account for rural economies and social structure;
 - inadequacies in terms of SIA process; and,
 - inadequacies in terms of SIA analysis.
- ii. Mitigation and management strategies proposed to address social impacts are insufficient.
- iii. The Bylong Project presents unique moral issues that should be considered by the IPC. These relate to the matter of distributional equity, which require valuation of social, economic and environmental costs and benefits as they manifest within different locations and in relation to various individuals and groups affected (positively or negatively) by the project.
- iv. There is a distinct inequity embedded in the proposed development, which exposes a particular part of the population (rural landholders in Bylong who are in competition with the Proponent regarding key resources, particularly water) to the vast negative impacts, with few, if any, benefits. The SIA does not consider this inequity.
- v. There is a distinct lack of attention to the transnational nature of the project and the fact that this is a proposed greenfield mine. Further consideration is required in terms of the social impacts on the broader community, specifically as it relates to greenhouse gas emissions and climate change.

11. KEPCO's response to my submission is misleading and incorrect. It should be noted that:

- i. It is suggested that the issues and concerns that I raise in relation to the Project are derived largely from my discussions with the neighbouring Wollar community and analysis of impacts

on the Wollar community by the Wilpinjong, Moolarben and Ulan Coal mines. This is incorrect. Bylong constitutes one of the case study areas of my ongoing research (see paragraph 4, above).

- ii. My analysis is, accordingly, drawing on my work in Bylong. It should be noted that my broader research includes work on land use conflicts in multiple regions and areas of NSW, and to suggest that I simply draw on my work in Wollar is misleading. The analysis is founded upon in-depth ethnographic work that acknowledges the role of case-specific analysis, and the opinions presented in both my original and the present submission, are specific to the case of Bylong.
- iii. When referring to me and my work, KEPCO addresses me as 'Ms Askland'. This undermines my expertise. I hold a PhD in social anthropology and have 15 years research experience working on matters related to community conflict, identity and belonging, having focussed specifically on land use related conflicts since 2014. My correct title is Dr.
- iv. I stand by my analysis of the SIA and the Peer Review. The argument presented by KEPCO (via Hansen Bailey) in their Response to Submissions Appendix 9, which states that the SIA completed for the Project is adequate and that the social impacts will be appropriately managed throughout the life of the Project is unsubstantiated. The failures in the SIA methodology and the lack of adequate evaluation and assessment remain a key concern.

12. In contrast to KEPCO's response to submission, the PAC do recognise the failures of the SIA and the depth of social impact concerns. It is stated that: '[t]he commission is concerned that social impacts in the Bylong Valley have not been fully recognised (Bylong Coal Project Commission Review Report: 17). The PAC acknowledges that the local community has already endured significant adverse consequences. It questions the Department's assessment that social impacts are inevitable because of the location of the resource. Whilst it is clear that the location of the resource will have distinct consequences for the local community, I agree with the Commission in their conclusion that to dismiss such consequences because of their 'inevitability' is inadequate. Such attitudes overlook the significance of impacts and leads to inadequate mitigation and management strategies, with potential future impacts exacerbated.

13. The PAC concludes that there are several inadequacies in the social impact assessment of the project (Bylong Coal Project Commission Review Report: 18) and that the severity of social impact cannot be determined. In my view, without adequate understanding of the social impacts of the project, an appropriate SIMP cannot be developed. The project, should not proceed without an adequate SIA.

14. The PAC's concerns are addressed in KEPCO's response to the PAC Review (Hanson Bailey, January 2018). It is stated in this response that the concerns are assessed in the Preliminary

SIMP. A detailed review of the Preliminary SIMP is provided in Section 2.0 (below). In terms of KEPCO's general comments, please note:

- **Health and wellbeing:** KEPCO forwards the voluntary property acquisition process as a strategy to alleviate potential landholder stress and anxiety and offer landholders certainty with regards to their future. My engagement with current and former landholders from Bylong suggests that many of those who have been bought out have, indeed, found that the process of relocation has offered a sense of relief and an opportunity to move on. The process of acquisition did, however, exacerbate stress for the remaining landholders and the cumulative impact of property acquisition, as well as its implication for Bylong as a community and a place, have not been taken adequately into account.
- **Change in social capital:** To recognise that there has been a historical change in the social capital of the Bylong Valley does not adequately acknowledge how mining interests in general and KEPCO's interests more specifically have impacted the area. Indeed, as is recognised in KEPCO's response, out-migration due to the proponent's property acquisition resulted in significant changes in the social structure and social networks, with both immediate and long-term impacts on the remaining residents.
- **Social connectedness:** When referring to the recent survey of 30 Bylong residents, it is said that more than 60% of the participants agreed or strongly agreed that they 'were coping' with the project, with less than 20% disagreeing or strongly disagreeing. It is unclear what 'coping' means in this context and also how the results of the survey reflect matters of proximity and equity. Moreover, that the majority claim to be coping with the project does not warrant the dismissal of the impacts that the project is having on local residents. Indeed, the fact that 20% state that they do not cope with the project emphasises the need for a real social impact assessment that can support a comprehensive and appropriate SIMP. The contention that if 'the Project is not approved, the socio-economic and other benefits which are set to flow to the Bylong Valley will largely evaporate' is not substantiated. Whilst it is acknowledged that KEPCO's initiatives in the area will cease, this assertion does not take into account other opportunities that may manifest in the absence of a mine.

15. In the Bylong Final Assessment Report, the DPE base their acceptance on the preliminary SIMP, prepared by the proponent. As stated above and outlined in detail below, the preliminary SIMP is inadequate. This is, at large, because of the shortcomings of the SIA; without an adequate assessment of social impacts, an adequate plan for management and mitigation cannot be developed. The emphasis placed on the broader support in the region for the mine, particularly in the regional towns of Mudgee, Rylestone and Kandos does not take into account the key social impact issue of distributional equity (both in terms of temporal and spatial impacts).

16. Social impacts related to place and place attachment, including how it relates to environmental variables such as amenity, visual, noise and air quality, are concerns that continue to be inadequately addressed. Intergenerational equity as well as distributional equity related to proximity and spatial location are also overlooked in all assessment documents, including the DPE's final assessment report.

2.0 FURTHER OBSERVATIONS

17. As stated above, the proponent (KEPCO) provided an inadequate SIA as a part of its application process (see my original submission, Appendix A).

18. Despite the fact the DPE's own peer review of the proponent's SIA found it severely wanting, the DPE recommended the Bylong project for approval to the PAC.

19. The PAC, however, rejected the DPE's recommendation, citing, among other things, the inadequacy of the proponent's SIA and the DPE's acceptance of social impacts as inevitable:

[t]he Department's assessment of social impacts and recommended mitigation measures appear to accept a degree of inevitability to these existing and potential social impacts; implying that they occur because of the location of the resource; that wider, regional benefits justify them; and in the case of the applicant's property acquisitions, that they occur under open market conditions (PAC Review Report, 25th July, 2017, pg. 17).

20. In response, the proponent produced a preliminary SIMP. In the DPE's final assessment report (October 2018), they cite the SIMP, summarise parts of it, and recommend the project for approval. **A crucial shortcoming in this process is the lack of critical assessment of the SIMP.**

21. The DPE states in their final assessment report (pg. 64) that '[t]he preparation of the Preliminary SIMP also considered the Department's *Social Impact Assessment Guidelines* [sic]². The DPE report goes on to provide a summary of what the proponent states it will do, in terms of social impact management. This is, however, done without any critical review of the proponent's claims against the DPE's own Social Impact Assessment Guideline. For example, the DPE place an overwhelming emphasis on the positive social impacts of the project in the greater region (echoing the proponent's own statements and claims) yet provides no assessment of the distributional equity of the social impacts.

² The DPE has incorrectly cited their own policy in the plural (Guidelines) where it should be referred to as 'Guideline'.

22. The DPE appears to suggest (see Executive Summary, Final Assessment Report) that the negative social impacts experienced by those in the immediate locality via land acquisitions are offset by the positive social impacts for the greater region. This kind of offset rationale is in direct contravention to the principle of distributional equity. Distributional equity concerns how negative social impacts of projects may be distributed spatially, temporally and socially and what *inequitable* social impacts that may have. Distributional equity is a key pillar of social impact assessment and highlighted throughout the DPE's own Social Impact Assessment Guideline, yet **the DPE has not assessed the proponent's SIMP in terms of distributional equity**. In fact, the DPE does not appear to have actually assessed the proponent's SIMP at all.
23. If a robust and rigorous assessment of the SIMP had been undertaken against the DPE's SIA Guideline, it would have likely revealed a number of fundamental weaknesses, including, but not limited to, the following:
- i. **There does not appear to have been a new social impact assessment conducted for the SIMP.** The failure by the proponent to undertake an adequate SIA was a matter of concern to the PAC in 2017. Lists of discrete items are presented in the SIMP (see examples below) but assessment of their net effect in terms of such basic matters as distributional equity, application of precaution to future uses of the land and so on, is missing. Moreover, a SIMP cannot replace an actual social impact assessment.
 - ii. **In the absence of an assessment there cannot be a SIMP** because the aim of a SIMP is to mitigate, moderate or remove assessed adverse impacts. These have not been presented. What this document does is simply present lists of changes and then address the changes. Their combined effects and the social import of these combined effects are neither contemplated nor addressed.
 - iii. **A preliminary SIMP has no standing.** The SIMP is preliminary only and states that a final SIMP will be prepared following the granting of the Project development consent, that is, the final SIMP could be quite different.
 - iv. **No social science research.** The SIMP appears to be based on demographic data and other public enumerative data and consultation outputs. Neither the proponent's original SIA nor the SIMP appear to rely on any social science research findings (e.g. as to effectiveness of mitigation actions regarding loss of livelihood). This is a basic failure of methodology. The absence of social science research mirrors the approach taken in the SIA itself (see the Reference lists in both documents, which largely comprise data sources).

v. **Stakeholder concerns are relevant to but not the same as social impact assessment.**

To express the serious issues of the social consequences of water changes and the loss of a rural and agricultural way of life, and the resource that this valley represents in terms of an agricultural and social future, as 'stresses' and 'concerns' to local stakeholders is to fail to provide a social impact assessment of these risks.

vi. **The SIMP document and its proposed plans are vague, subsequently making enforcement impossible.** The five preliminary action plans (SIMP: 92) are characterised by:

- strategies for new residents working for the mining company, not existing residents;
- monitoring and, in the event of adverse monitoring results, an expectation that the mine company will do the right thing. This places local residents and land owners at the mercy of the mining company. This is unsatisfactory. In these plans there is no independent agency monitoring the monitors;
- an absence of actual provision for a social initiative, with the exception of three years funding for a youth officer working across five towns (i.e. one day a week per town) (SIMP: 113). Absence of actual provision is signalled by the repeated use of verbs such as encourage, work with, investigate, engage with, seek, advocate, collaborate, assist and so on. While all such processes can be worthwhile, they can equally be trivial, minor and come to nothing.

There is nothing in these plans to ensure actual outcomes that will mitigate adverse social impacts (if we knew what these were) or even that they will result in anything tangible other than act as PR for KEPCO and allow it to use monies identified in the Voluntary Planning Agreements (VPA) for their own operations and staff.

vii. **Lists of social impacts do not constitute assessments.** Whilst the SIMP contains a list of social impacts it fails to provide any assessment of them. The listed social impacts include:

- stress and anxiety arising from uncertainty in relation to perceived future Project impacts, particularly impacts arising from off-site water changes, and the opportunity available to claim compensation;
- reduced safety conditions along Bylong Valley Way for road users due to increased traffic and gradual deterioration of road surface conditions;
- impacts to rural property values;
- ongoing perceived concern in relation to potential off-site water impacts threatening future viability of agricultural production in the Bylong Valley post mining; and,
- reduced rural amenity in the Bylong Valley.

The five points in this list are followed by seven 'key social opportunities', including:

- greater variety of services and facilities available in the Bylong Valley, particularly through the Bylong General Store;
- resident population growth;
- enhanced attractiveness and general appearance of the Bylong Village;
- improvements in local and regional road networks;
- employment opportunities for local residents;
- improved community capacity for resourcing local organisations (e.g. Bylong Rural Fire Service); and,
- improvements to, and preservation of, items of local heritage interest (e.g. Lee Homestead).

At the regional level the SIMP provides a list of 14 social risks but 15 opportunities. Whilst the number of items in these lists is arbitrary it should be noted that the lists for each area have more opportunities than risks, accordingly supporting the proponent's case. It is important to note that no analysis of the distributional equity of these impacts is provided, nor is there any analysis about the adequacy of the proposed opportunities and how they relate to matters of temporal and spatial proximity.

- viii. **The SIMP relies on plans as the 'key tools' to manage potential social impacts.** This approach has a number of shortfalls and omissions as outlined below:

Key tools	Comment
Project design and siting of mine infrastructure to reduce social planning.	This should be dealt with in the DA.
Voluntary Planning Agreement between KEPCO and MWRC (SIMP: 87)	Appears to be a series of levies and contributions.
Establishment of a Project Community Consultative Committee (SIMP: 87)	This is a DPE requirement and does not constitute a strategy for mitigation. The composition of this committee and how it is funded is important, yet this is not addressed in the SIMP.
Implementation of ongoing Community Investment Strategy (SIMP: 87 and Appendix E: 284)	This appears to be funded via the VPA and corporate sponsorships. It is stated that: '[t]he strategy is based on the outcomes of the initial Community Needs Assessment (CNA) undertaken in early 2016 and informed by social research and engagement conducted as part of the Project EIS'. However, as detailed in this submission and my original submission, there are significant shortcomings in the SIA, with little sign of social research. It is unclear how this strategy will be implemented in practice. It is, for example, unclear what this strategy will actually be directed

	at. This exposes risks that the mining company will provide benefits to its new resident workers (perhaps instead of the few remaining residents) and that corporate strategies are used as a marketing strategy for KEPCO.
Development of a Local Content Policy Plan (SIMP: 88).	This is a plan to encourage local business participation. It is unclear how this will benefit local residents who are not in the mining or mining services business.
Adoption of a Recruitment and Training Strategy (SIMP: 88).	Strategies are not the same as actual hire.
Finalisation of a detailed Workforce Accommodation Strategy and Labour Force Study (SIMP: 88).	This strategy will benefit mine workers and is not directed to the benefit of local residents.
Preparation of an Indigenous Participation Plan (IPP).	It is stated that: '[t]he IPP will map details of existing Indigenous businesses and identify regional 'pockets' of potential Indigenous labour supply (e.g. those areas with high levels of Indigenous unemployment) [...] The IPP will aim to identify particular job positions and supply work packages that will be targeted for Indigenous inclusion, and appropriate training and development programs will be outlined to support this objective.' This is inadequate. Aims do not constitute outcomes. Indigenous concerns are not adequately dealt with.
Prepare a Mine Closure Plan	Even if a plan is a condition of consent, it may not eventuate and there is no guarantee that it will be conducted at a satisfactory level or produce appropriate strategies. Moreover, it may not be funded, may not be adopted by future owners and may be subject to continual change. The lack of a Mine Closure Plan at the stage of approval is, thus, not satisfactory from a social impact perspective.
Five preliminary action plans have been prepared.	Even if finalisation of these plans is a condition of consent, they may not eventuate and could say anything. As with the Mine Closure Plan, there is significant ambiguities from a social perspective related to how this will be funded, adopted by future owners, and be subject to change.

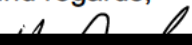
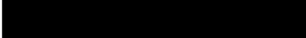
24. On the basis of the analysis outlined in paragraph 23 above, it is my professional opinion that the SIMP is not acceptable. In terms of the impact the project will have on the central locality of the Bylong Valley and Bylong Village, a lot of the damage has already happened. The SIMP should, accordingly, not only look at the management and mitigation of social impact but also identify how the community can be genuinely compensated and how partnerships can be built to ensure the viability of Bylong as a place and the wellbeing of local residents. This approach will be aligned with the Mid-Western Regional Council Towards 2030 Community Plan, which has as its key goal to ensure the vibrancy of towns and villages, respect and enhance the historic character

of the region and manage impacts of mining. In order to do so, the SIMP requires a much more sustainable approach to mitigation and management of impact.

CONCLUSION

25. I maintain that the SIA process for the Bylong Coal Project, and its assessment by the DPE, is flawed and inadequate. The conclusions reached by the DPE in its Final Assessment Report is problematic as it relies solely on the preliminary SIMP, which, as detailed in Section 2.0 of this report, has significant shortcomings. The SIMP in itself is inadequate as it relies on the flawed and insufficient SIA.
26. The assessment provided in my Original Submission remains valid and the opinion expressed in my submission to the PAC has not changed as a result of the additional Revised Project Information.
27. KEPCO's response to my submission is misleading and inadequate.
28. Before any decision can be made about this project, adequate analysis of the social impacts, in line with the NSW DPE's own guideline, must be conducted. Particular attention must be paid to the matter of distributional equity and cumulative impacts.

Kind regards,

Dr Hedda Haugen Askland

APPENDIX A

Dr Hedda Haugen Askland Submission to the PAC, 17 May 2017

NSW Planning Assessment Commission
Commission Secretariat
pac@pac.nsw.gov.au

Attention: Chair, Mr Brian Gilligan

17 May 2017

**SUBMISSION TO THE PLANNING ASSESSMENT COMMISSION –
BYLONG COAL PROJECT – SSD6367**

Dear Commissioners,

The following submission is an expert witness report related to the social impacts of the Bylong Coal Project currently being assessed by the Planning Assessment Commission (PAC). I, Dr Hedda Haugen Askland (Cand.Mag, MSocSc, PhD), have read the Expert Witness Code of Conduct in Schedule 7 of the Uniform Procedure Rules 2005 and I agree to be bound by it.

I am a qualified social researcher and have been working with local communities in the area over the past two years. I am employed as a Senior Lecturer at The University of Newcastle, where I am conducting a long-term ethnographic research project with mining-affected communities in the Upper Hunter and Mid-Western Region of New South Wales. Bylong is one of the case study area for this project, which explores issues of migration, resettlement and displacement in the context of mining.

I have reviewed the Social Impact Assessment developed by Hansen Bailey for the Proponent, as well as the Peer Review commissioned by the NSW DPE and developed by Elton Consulting and KEPCO's response. In addition, I have reviewed the RTS, the SIA No WAF Accommodation Scenario, the Workforce Accommodation Stud, Supplementary Responses to Submission, and the DPE Preliminary Assessment Report.

This report should be used as evidence of my professional opinion and contains information that I believe the PAC must be aware of in order to make an informed decision about the project. It raises what I believe, in my professional opinion, are problematic elements of the Social Impact Assessment for the project, the Peer Review on which the Department's approval of the project is founded and the Response to Submissions, and outlines additional concerns and observations that I believe are relevant.

EXECUTIVE SUMMARY

In this submission, I forward a review of the various documents related to the social impact assessment for the Bylong Coal Project: the Social Impact Assessment (SIA), the Response to Submissions (RTS), the Peer Review and the DPE Preliminary Assessment Report. In light of the evidence presented in these documents, I argue that the social impacts of the proposed projects have not been adequately assessed and that the mitigation and management strategies proposed are insufficient. I argue that a project of this kind presents unique moral issues that must be considered by the PAC. These relate to the weighting of social, economic and environmental impacts, which requires valuation of social, economic and environmental costs and benefits as they manifest within different locations. There is a distinct inequity embedded in the development. It exposes a particular part of the population—rural landholders in Bylong who are in direct competition with the Proponent in relation to key resources (particularly water)—to the vast majority of negative impacts whilst receiving very few, if any, benefits. This inequity is not considered in the SIA or any of the other documents for this project, yet it is a key concern when scaling benefits and costs. Moreover, there is a distinct lack of attention paid to the transnational nature of the project and the fact that this is a greenfield mine. Further consideration is required in terms of the greater social impacts that a project of this kind will have and the broader community costs of a greenfield mine.

1.0 Social Impact Assessment (SIA)

The Social Impact Assessment (SIA) of the Bylong Coal Project, prepared by Hansen Bailey, identifies a number of negative social and economic impacts and benefits for the Regional Study Area and the Project Area. The assessment of these impacts and benefits is, however, incomplete and inadequate. There are a

number of methodological and analytical shortcomings in the SIA, and the entire impact analysis section lacks evidence of social research and is devoid of actual, structured assessment. There is limited cross-analysis of the data, restricted reference to the environmental assessments, and a significant lack of consideration of cumulative, long-term impacts. The assessment does not include a 'no development' scenario, which is standard for any impact assessment and important for understanding change.

1.1 SIA requirements

- The Department of Planning and Environment Secretary's Requirements (23 June 2014) specified that the Environmental Impact Statement (EIS) for the development should include 'an assessment of the likely social impacts of the development (including perceived impacts), paying particular attention to any impacts on Bylong village'. I would argue that the social impacts are not explored or illustrated in the detail required as part of typical and adequate SIA practice. The SIA are inconsistent with the Secretary's Requirement given that there is:
 - no rating or assessment of the social impacts according to a defined assessment matrix (indeed, the SIA contains **no actual assessment of impact**, just reference to potential impacts);
 - refutation and consistent undermining of perceived impacts through lack of social research and analysis. The analysis remains descriptive and, as such, does not provide adequate detail for a decision to be made. It does not look at 'what does this mean' in terms of human wellbeing. The analysis only identifies impacts as 'positive and/or negative' and it is left to the reader to identify the severity, extent and temporality of the impacts.
 - a consistent focus on the regional benefits without adequate reflection on the local impacts. The local impacts identified in the SIA are significant, yet the substantial impact that the project will have on the village is not adequately dealt with and the proposed mitigation strategies are inadequate; and,
 - limited feedback from stakeholder engagement.

1.2 General concerns with the SIA

- It should also be noted that a number of negative social impacts have already manifested within the local community (Bylong Valley). This obscures the baseline, yet it is an issue that remains veiled throughout the social impact assessment, as well as other documents underpinning the Department's decision.
- The SIA is central to the assessment and decision making of the proposed development. As with any development of this kind, all project related assessment and decision making are connected to a moral economy, where the environmental-economic bind is negotiated. The role of the EIS, of which the SIA is part, is to enable determination of assessing costs and benefits within this nexus, and social, economic and environmental variables—such as noise, dust, water, traffic and 'the social'—get treated as objects for inquiry. What easily happens in this process—and what has happened in relation to the SIA for the Bylong Coal Project—is that individuals become treated as objects. The human element disappears from the assessment and it becomes a calculation of costs and benefits in which the essence of a social impact assessment gets ignored. This essence is **human wellbeing**. Ultimately, a social impact assessment is about reviewing how a project will influence human wellbeing and how individual's wellbeing can be maintained, if not, enhanced. The SIA prepared by Hanson Bailey fails to adopt a holistic, system analytical perspective that facilitates insight into the integrated variables underpinning wellbeing. It reduces social impact to singular, linear change rather than an integrated and cumulative process.
- As is stated in the various documents, social impact can be both negative and positive, and it is those who are living most closely to the coal resource that will be most exposed to negative impacts. There is a particular logic to social impacts in relation to costs and benefits: those who are closest to the project (that is, in this instance, the local residents of the Bylong Valley and the immediate villages surrounding Bylong, such as Wollar) will endure the most negative impacts and the least positive impacts. Vice versa, those who are further away will be screened from the direct negative impacts but will be able to enjoy positive impacts. There is, thus, a distinct creation of winners and losers in this project. Whilst the SEARs identify the need to consider geographical location as a distinct variable for assessment of social impacts, there is no consideration of how this is to guide assessment. Thus, we end up with a scenario in which

there is a descriptive analysis of social impacts as they manifest within different locations (Bylong versus LGA/Mudgee) but they appear to be treated as qualitatively similar when assessing project costs and benefits. This is problematic and it essentially means that the Government is willing to sacrifice the lives and wellbeing of some to the benefit of others. There are **distinct equity** issues embedded herein that are not addressed or acknowledged in the SIA for the project. Note that the first principle specific to SIA practice, as outlined by Frank Vanclay (2003: 9) in his discussion of the International Principles for Social Impact Assessment is equity considerations, which 'should be a fundamental element of impact assessment and of development planning.'ⁱ

1.3 Shallow analysis and insufficient assessment of cumulative impacts

- The analysis in the SIA as well as other documents is extremely shallow when it comes to negative and cumulative impacts. When, for example, it is stated in the SIA that people articulate 'sadness' about the changes to the place, that local residents experience a 'sense of loss of place', increased community tensions, liminality and ambiguity, concerns about the future, what do this really mean? In the SIA these statements and observations are treated without consideration of what this means in terms of people's current and future wellbeing.
- Whilst the word 'cumulative' is included on a number of occasions and the Proponent claims to assess cumulative impacts, this is not the case. As with direct social impacts, there is no real assessment of the impacts that are projected. There is some consideration of cumulative impacts in terms of a temporal scale but there is no systematic analysis of how the different components of the project will add up, nor is there adequate consideration of how the proposed project will 'speak to' the multiple mining activities in the region. Whilst there are some nods to cumulative impacts in terms of employment numbers and traffic, when it comes to the core issues of social impact as it is experienced within the local area this is not the case.

1.4 Failure to account for rural economies and social structure

- Whereas the SIA distinguishes in locality between Bylong and the MWRD LGA, it does not acknowledge the significant link that exists between Bylong and Wollar as remote, regional town that are historically connected. As both these villages are now under threat due to mining, I would argue that it is essential that a more thorough analysis of the cumulative impacts as they present in the intersection between the Bylong Coal Project and Wilpinjong, as well as Ulan and Moolarben, is considered.

1.5 Shortcomings in terms of SIA process

There are a number of shortcomings in the SIA in terms of process. These include:

- Lack of evidence of social research and actual, structured assessment of impact: the entire impact analysis section lacks evidence of social research and is devoid of actual, structured assessment of impacts, a requirement not only of the Secretary (NSW Department of Planning and Environment) but also typical of common SIA practice for major projects. There is neither in-depth thematic quantitative analysis of identified social impacts nor qualitative analysis (with a lack of stakeholder quotations to illustrate research findings).
- Social impacts have only been assessed as positive or negative: in any standard risk or impact assessment framework risks and impacts (see: Queensland Guidelines, T4 SIA, also lots of standard risk assessment tools) need to be assessed for key characteristics such as duration, significance (perceived and technical), likelihood etc. Just assessing an impact as positive or negative is meaningless (e.g. a positive impact could be temporary, a negative impact could be permanent and critical in impact) this detail is completely lost in the assessment.
- No ranking and prioritisation of social impacts based on risk/significance of impact: due to the lack of assessment described above, the impacts have not been ranked and prioritised for management. This means that the impacts and their management strategies are portrayed as equal in importance, duration etc. It is considered common practice of any impact assessment to include ratings of impacts and opportunities, and there are many available and widely used standard rating scales (see: QLD Government SIA Guidelines 2013). At no point is an assessment matrix provided to assess the relative extent of each impact or opportunity.

- No sense of an overall assessment of impacts and opportunities: how many stakeholders identified positive versus negative impacts? Where do these stakeholders reside? What are their experiential accounts of these impacts and opportunities?
- No sense of stakeholder feedback: there is no information about if and how stakeholders were provided with opportunity to comment and provide feedback on impacts/opportunities and their ratings.
- Lack of benchmarks, standards, best practice evidence: there is no sense of whether an impact is significant based on evidence/benchmarks. Burge (2004) states that a population change of greater than 5% will have significant social impacts; this has not been taken into consideration.ⁱⁱ
- Insufficient description of the proponent: the proponent has not been described in any detail and this is important for understanding social impacts of the proposed operation - what are its operational policies? financial statements/plans? history of mining operations/developments? ownership of existing land not mapped or described? OHS/workplace policies?
- Insufficient consideration and presentation of visual impacts: considering the importance of amenity impacts and the scale of open-cut operations, there is a lack of any maps or visual presentation of the evidence - i.e. maps of the project area do not give a sense of residential locations, numbers of residences, ownership of residences etc and are only included in the appendices; and no photos of the area. It is important to include maps and photos in the SIA and also provide project maps that show the 'social context' - i.e. residential locations, topography of area, adjoining industries etc.
- The 'no development' scenario is not assessed: standard part of any impact assessment and important for understanding social change.
- Management and mitigation strategies are vague and do not align with significance of impact: although it is proposed that the proponent would consider undertaking a Social Impact Management Plan (SIMP), the details of management strategies provided in the SIA are insufficient and do not consider the significance of the impacts as part of the design of the management strategies. Terms such as 'support', 'encourage' and 'assist' do not provide a sense of 'how' these actions will happen, when etc.
- The consideration of specific impacts lacks social research and analysis, i.e. there is limited quantitative and hardly any qualitative data and analysis provided, very few stakeholder quotations, and no supporting literature or research.
- Limited stakeholder engagement program: the stakeholder engagement program appears very limited. More information is required regarding the methodology and sampling underpinning the research for the SIA. The interview schedule and survey used for the SIA are not included, subsequently restricting transparency about how the conclusions presented in the SIA have been reached. There is little evidence provided in the SIA for comprehensive stakeholder engagement and very little detail on the participants.
- Health impact assessment is required: due to the nature of the project (open-cut, greenfield), extent of existing operations, and emerging evidence on coal mining and health impacts, we would push for the urgency of conducting a health impact assessment.

1.6 Shortcomings in terms of SIA analysis

- My main concern with the SIA in relation to its analysis of the data relates to the Secretary's first Social and Economic Requirement, namely: 'the assessment of the likely social impacts of the development (including perceived impacts), paying particular attention to any impacts on the Bylong village' (Secretary's Environmental Assessment Requirements SSD 14_6367, 2014: 3). The methodological shortcomings identified above impart significant limitations on the analysis of the data and the assessment of identified (perceived) social impacts. Whereas the SIA gives particular attention to the social impacts on the Project Area (the Bylong Valley), the analysis of these impacts is shallow and lacks references to the primary data and existing research. The impacts are not adequately analysed in relation to one another; each identified impact (positive and negative) are treated in isolation, though these are intertwined and together they create a much more complex picture than what the SIA presents.

- For example, on p.42 it is stated that the consultation identified the concerns of ‘changes in natural landscape...and the perceived corresponding change in rural character’. It is also emphasised on p.40 that one of the key assets of the area is its ‘remoteness and peacefulness’. On p.42, it is stated that one of the opportunities associated with the project is population growth. The assessment identifies potential increase in social capital and increased population in the Project Area (temporary). The opportunity identified is, however, not analysed in relation to how it will impact on the key assets of the area. Only some off-handed comments are made about how the workforce will be working long shifts and, as such, have limited opportunity to contribute to the area. Moreover, no consideration is made as to whether this in fact will be in the interest of the workers. No analysis is made about how the remoteness and peacefulness may be impacted by the presence of the WAF and the increased traffic of workers coming along the new (proposed) Wollar road from Mudgee. Moreover, in the subsequent SIA No WAF Accommodation Scenario, the social impact of increased traffic on the surrounding area, such as that between Wollar and Bylong, and the impacts on Wollar Road through the Munghorn Gap Nature reserve are not adequately addressed.

1.5.1 Introduction

- This section provides an introduction to the SIA and the Project. It describes the background and context of the Project. This section is meant to introduce the proponent, however there is only one sentence included about KEPCO. The insufficient description of the proponent is a significant shortcoming of the SIA and has implications for the subsequent assessment. More information about the proponent’s operational policies, financial statements and plans, history and past experience of mining operations and developments, ownership of land and workplace policies is required.
- The background to the project describes the parallel/dual construction phase. This is not dealt with adequately in later sections of the SIA. The social impact of dual construction and operation of mining activity needs to be properly assessed; both in terms of their independent impacts and their cumulative impacts. The SIA does not address existing literature on cumulative impact.
- Considering the emphasis in the data on ‘diverse economies’ the lack of understanding, analysis and management strategies of cumulative impacts is a significant shortcoming of the SIA. Indeed, as argued in the recent CSR report on cumulative impacts, ‘[t]he impacts of individually minor, but collectively significant activities taking place over time, when considered together, than compound or increase their effect. These cumulative impacts present greater management challenges than individual activity impacts’ (CSR 2015: 5).

1.5.2 Project setting

- In section 2.2.1, it is noted that whilst coal mining is new to the Bylong Valley, coal exploration has been occurring for more than 15 years. **The pre-existing impact of mining activities in the Project Area is not adequately addressed in the SIA.** The SIA presents the Project as a novel activity within the area and does not analyse if/how the proponent and its predecessors’ activities in the area have had social impacts such as depopulation, closing of the school, and loss of services. Whereas these issues are noted in the later chapters of the SIA, it is not sufficiently analysed in the context of the proponent’s past and current activities in the area.
- When presenting the Central West Regional Action Plan’s planning priorities for the region (p.13), these are listed as if they are in hierarchical order. More information is required here. Moreover, the discussion of the Plan only considers how the mining sector positively contributes to the planning priorities and no information is included about how the Plan considers expanding mining sectors in relation to competing land uses and diverse economic strategies.

1.5.3 Project Socio-economic characteristics

- Section four outlines a number of important issues, including the question of workforce recruitment and workforce roster assumptions. Key issues in this section are the lack of attention to the cumulative impacts of construction and operation, and the implications of dual construction and operation. This section outlines operational factors that have significant implications for social impacts discussed later in the SIA; however, these are treated in isolation and there is no in-depth analysis of the relationship between the project’s socio-economic characteristics and other social impacts. For example, in relation to

the workforce roster assumption; the seven day rotating roster for the duration of the construction phase suggest that there will be an influx of people to the area who will have limited, if any, engagement with the local community. It will increase traffic and noise, which will deter the quality of life for local residents. It states that the roster will 'be sensitive to Mudgee community values' (p.33), but it does not adequately explain what 'Mudgee community values' are, nor does it explain how it will be 'sensitive' to these values. Moreover, it does not consider how this will be aligned with 'Bylong community values'.

- In the discussion about the Worker Accommodation Facility (WAF) it is stated that 'the WAF has been designed to address social amenity considerations and blend in with the Bylong village'. No information is provided as to how this is facilitated, and it is unclear how the WAF, which can hold 650 people, will 'blend in' with the local community. This is a typical example of the limitations of the analysis of the SIA.

No-WAF Accommodation scenario – this concern is addressed through the no-WAF accommodation scenario. Should, however, it at any time be deemed necessary to build a workforce accommodation facility, the questions of integration of the workforce with local community will be required.

- Assumptions of Workforce Residential Locations – the SIA suggests that the Operation Phase will encourage NLHs to reside permanently within the Local Area. How will this be done? What does 'permanent' mean? It is significant that the SIA speaks about residence as 'permanent' when it is referring to a temporary project that will endure a gradual reduction in workforce.

1.5.4 Community issues, values and aspirations

- A key issue with this section is how each of the values identified are treated in isolation. The themes (variables) identified are interconnected and it requires a holistic perspective to fully understand the impact (positive and negative) of the Project. The data that is presented in this section is open for misinterpretation; a fact that is further increased due to the lack of transparency about the questions that have been asked. The discussion about the values and the 'existing issues' and 'issues and opportunities' is treated separate but should be cross-analysed.
- This section does not consider the health impacts that may arise from the project related issues identified (e.g. changes to natural landscape, loss of rural character, air quality changes etc.).
- The SIA suggests that with population growth, the Project will attract new residents to the Bylong Valley, and that this may secure long-term viability of the local school. This is unsubstantiated. No analysis about the location of the school within the Project Boundary Area and how this may impact on the viability of the local school is made. This lack of information is misleading.
- The SIA presents an unsupported and unrealistic assumption about relocation of families to the Bylong Valley. In what other areas adjacent to major coal operations have families relocated? The SIA fails to justify this claim that approximately 20 employees with families could move to the area. Pure speculation used to disguise significant population impacts.

1.5.5 Population and demographics

- The SIA identifies a significant loss of population from the Project. The SIA notes 14% population loss from Bylong Valley due to the Project. It does, however, not include additional loss of population due to the social impacts of the Project. The figure presented is nonetheless significant; as mentioned above, Burdge (2004) states that a population change of greater than 5% will have significant social impacts. Considering the small scale of Bylong Valley, a 14% population loss further enhances its significance. If this loss was equated to loss to the broader Mudgee area, it would result in the loss of approximately 1400+ people.
- Population changes associated with property acquisition (p.67). This section of the SIA considers the 'perceived' cumulative impact on population decline due to property acquisition associated with coal exploration in the Bylong Valley. This section is a typical example of how the SIA uses 'perceived' to describe negative impacts of the Project or associated with the activities of the Proponent. The population changes in the Valley as a consequence of coal activity are not 'perceived'; these can be analysed and tested as they are backward looking. The discussion in this section and the calculation of changes in population are also typical of the limitations to the analysis and the lack of cross-analysis of data and

holistic exploration of the issues at stake. In this section, the net calculation of population loss is calculated to ten people (10% of 2014 population). There is no discussion of the significance of this number and the social impacts that this significant change pose on the area; as stated above, any change greater than 5% is believed to have significant social impact. Why is there no further discussion of the social impacts? Why is there not assessment of how this change has impacted the local community and its members? Why is there no modeling based on these experiences in relation to the forecasting of property acquisition?

- In relation to future property acquisition, the SIA states that '[w]hilst the percentage change in population from Project related property acquisition appears significant, it must be considered in the context of the gradual decline in Bylong Valley population' (p.68). This statement is not supported by any analysis of how the existing population decline relates to the presence of coal mining activity and the Proponent's acquisition of property in the area.
- In the same paragraph it is stated that '[i]t is realistic to plan for the return of land affected by open cut mining to productive non mining land uses and for the associated arrival of new landholders to manage land' (p.68). This statement is not supported and it is unclear how this will happen. Moreover, it is a complex argument to suggest that future population can 'replace' existing populations with long-term history. It also does not account for the stress and uprooting that the current population will go through as a consequence of the mining activity. The analysis presented in the SIA suggests that you can simply pause a community for a period of time; there is a significant body of work that shows that this is not the case. The lack of acknowledgement of social research in this area is problematic.
- The use of the term 'permanent resident population predicted for the Bylong Valley' (e.g. pg. 73) is problematic as there is no qualification or discussion of what 'permanent' means, nor the potential long-term social impacts (negative and positive) of such population change.

1.5.6 Labour market dynamics

- This section does not adequately address what will happen in Bylong.
- Local employment benefits are assumed to automatically flow to local residents but there is no evidence of a local recruitment/procurement strategy associated with the project. The SIA also assumes the 'generation of employment opportunities for existing residents of the Bylong Valley', again without any commitment to local recruitment or training. It should also be noted that the analysis of local employment benefits does not consider how the employment opportunities that may potentially arise from the project are aligned with people's motivations and aspirations. Whereas the local employment benefits – if sufficiently addressed through procurement and recruitment opportunities – may presents opportunities for local residents, it may also be a negative impact as the new employment may replace traditional work (e.g. move from employment in agriculture to extractive industry).

1.5.7 Housing and accommodation

- Property market analysis: the impact on the property market is based on unsubstantiated assumptions that do not draw on precedents at other sites. The figure of 9% relocation of NLHs is included without support or justification, and relocation projections are based on peak workforce. Any modelling of population and property market impacts must be modelled on average annual workforce.

1.5.8 Community liveability

- This section describes the SIA study area in terms of community liveability and presents the potential impacts of the project on community liveability, and a description of the management of these impacts.
- This section is a key section in exploring, analysing and assessing the intangible aspects that will be affected by the Project, as well as the interconnections of the various changes identified in the social composition of the local community, the environmental (physical) changes, and the changes to livelihood, economy and social cohesion. It is, however, treated largely in isolation from the other sections. It is not possible to adequately assess liveability without considering it in relation to the economic, social and environmental factors that have been identified in the previous sections of the SIA.

- There is no explanation of what is meant by or definition of ‘community liveability’.
- There is a gap in understanding and knowledge about the meaning and role of ‘place’.
- An extensive body of research exist about the connections between people’s home, identity, community and belonging, yet there is no references made to this research or to other areas that have endured similar changes as to what Bylong is exposed to.
- The SIA points to the character and amenity of the Bylong Valley (p.152), to the concept of community cohesion (p.153), and to the question of residency stability (p.153). Yet, no analysis is presented by which these values are assessed against the social impacts identified in the earlier sections (e.g. housing, employment, population change).
- Section 10.2.5 (pg.157) outlines issues related community health and wellbeing. The lack of analysis and assessment of health impacts and their relationship to both environmental and social changes is one of the most significant shortcomings of the SIA. The SIA only mentions stress and tension, noise and air quality (one paragraph) despite this being an identified as an ‘evident finding’ in the material. Considering the extensive research that exist in relation to the health impacts due to environmental and social change in relation to large scale mining activities, it is highly problematic that there is no real analysis and assessment of community health and wellbeing.
- Section 10.3.3 (pg.167) looks at ‘loss of connection to land’; this is another issue that has been identified in existing research as a significant health and wellbeing issue. The analysis that is presented here is problematic, not least because of ambiguous use of quotes and unclear reference to stakeholders as ‘participants’ – who is it that is represented here? Whose voices is it that is quoted? What does it mean when someone says that the can ‘move to any place where there was similar land’ – where does the person who said this live? Who are ‘the participants in SIA consultation’ that are cited in this section? The lack of evidence of social research displayed in this section is not unique and is characteristic for the whole SIA; this section can be used as an example of the shortcoming in evidence of social research.

1.5.9 Conclusion

- The summary of the ‘positive impacts of the Project on the Bylong Valley’ (p.228) is highly contentious and exemplifies the problems with the SIA. It uncritically forwards population growth as a benefit for community capital, infrastructure and availability of volunteer work; it uncritically forwards the potential for improved local social capital, skills and capabilities, it suggest improved local infrastructure and services, and an opportunity for strategic approach to land management and land improvement due to a significant proportion of the land being held by a single entity.
- These benefits are contradicted by the negative impacts, summarised on p.229, which includes loss of rural character, adverse changes in rural amenity, changes in local and regional perceptions of community identity etc.
- The conclusion is a clear illustration of the shortcomings of the SIA and its limited analysis. It presents contradictory data and insufficient analysis. For example, on the one hand it says that the Project holds the potential to improve local social capital; on the other hand, it says that the loss of long-term landholders will result in negative impacts on social capital. These two findings needs to be assessed in relation to the baseline; it is not sufficient and meaningless simply to classify these as positive and negative. A much more thorough analysis that looks at the range of data, adopting a system analytical approach is required not only to understand the social impacts of the Project but also to develop mitigation and management strategies that are in the interest of those affected.

2.0 Response to Submissions (RTS, March 2016): concerns about SIA, response and adequacyⁱⁱⁱ

Shortcomings of SIA addressed in the RTS	Response to Submissions	Adequacy of response
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<p>Inadequate analysis of social and cumulative impacts (5.25.1)</p>	<p>Cumulative impacts discussed in Section 4.2.7 and Sections 5-9 of the SIA. Loss of rural population discussed in Section 5.25.15.</p>	<p>The RIS refers back to Section 4.2.7. This is a misleading presentation of material, as section 4.2.7 does no address the issues of cumulative impacts but instead refers back to the SIA, which is inadequate in terms of assessing cumulative impact. Thus, whilst claiming to address this significant concern and shortcoming, no effort is made to present a thorough analysis of cumulative impacts (both temporal and spatial). In order for cumulative impacts to be addressed, a system analytical framework should be established in which the interlinking and interactions between the various spatial and temporal variables, as well as economic, environmental and social impacts, are investigated.</p> <p>The response in the RIS is misleading, and one of the key Secretary’s Environmental Assessment Requirements is, thus, not addressed.</p>
<p>Methodology and compliance with SEARs (5.25.2)</p>	<p>The proponent emphasises in their response to the methodological criticism that:</p> <ul style="list-style-type: none"> i. There are not specific NSW Government guidelines for the preparation of SIA in NSW. It is stated that the SIA was guided by the SEARs and the regulatory framework in other states, such as Queensland. ii. The SIA is not an academic research document but designed to address specific approval requirements of NSW government. iii. The SIA has been prepared by a specialist in the SIA field, Bronwyn Pressland, with more than 20 years experience. iv. The SIA considers the interlinked aspects of economic, social and environmental change. v. Assertions on lack of analysis of quantitative and qualitative data are not valid. 	<p>The proponent's address of the methodological concerns are inadequate:</p> <ul style="list-style-type: none"> i. It is correct that at the time of the SIA, there were not specific guidelines for the preparation of SIA in NSW. The proponent successfully points out how the SIA is guided by the SEARs and in which section the various requirements are addressed. It should be noted that, whilst the SEARs is addressed the concern about lack of rigorous analysis and methodological insufficiencies remains. The reference of the regulatory frameworks that are underpinning the SIA is problematic as there is no evidence of this in the original SIA and, subsequently, it implies that this has been retrofitted. ii. Whilst not an academic document, a minimum expectation of analysis of impact through the use of risk analysis and matrixes is required in order for this SIA to comply with best practice (see, for example, Table 4 – Worksheet for summarising the results of preliminary significance assessment, page 16 of the NSW DPE Draft Guidelines for State Significant Mining, Petroleum Production and Extractive Industry Development). iii. It is a welcomed addition to the SIA to be provided with the information about the lead researcher and the SIA team. Whilst it is recognised that Ms Pressland has significant experience in the field, it does not take away the failures of the SIA to comply with minimum expectations of an SIA. iv. In the RTS, the proponent makes reference to Frank (2012) and his argument about how a number of common changes included in mining can lead to social impacts, including

		<p>social and cultural change, economic change and socio-environmental change. It is stated in the response that the SIA considers all of these common changes and many more are identified. This is correct, and the SIA does go a long way in identifying social, economic and environmental change and offers some analysis of how these are linked. This analysis is, however, inadequate and is primarily a social and economic profile of the impacted communities.</p> <p>v. The SIA does contain analysis of both qualitative and quantitative data but it is primarily descriptive.</p> <p>One of the key problems with the SIA and the RIS is that the negative impacts identified are forwarded as matters that can be mitigated. There is no discussion of alternative scenarios; management and mitigation responses are not the same as assessing the likelihood and the severity of the impact. The latter is an essential part of the SIA process and remains unaddressed in the SIA and the RIS for the project.</p>
<p>Scope and implementation of the SIA (2.25.3)</p>	<p>The methodology adopted for the consultation process is described in Section 3 of the SIA and consultation for the EIS is described in Section 5.</p>	<p>The response from the proponent on this matter is adequate and missing information is provided. It should, however, be noted that I have been informed that this particular issue refers to the sense of bias that emerged through the consultation process with local people, in particular, which was generated by the fact that interviews were held on KEPCO owned land.</p>
<p>Scope of assessment, including (2.25.4):</p> <ul style="list-style-type: none"> • lack of social research and assessment against benchmarks, standards and best practice; • no temporal understanding of impacts, only assessed as negative and/or positive; • no prioritisation or ranking of social impacts; • no sense of stakeholder feedback; • limited assessment of WAF; • insufficient description of proponent; • insufficient consideration of visual impacts; 	<p>The proponent refers back to section 2.25.2, and states in relation to the critique of a lack of health impact that this was not a specific requirements and therefore not included.</p>	<p>The details of this critique are not adequately addressed through 2.25.2, which presents a framework that appears to be retrofitted. Moreover, whilst it is stated that it is 'best practice', these methodological concerns point to distinct issues in the analysis that remains unaddressed. There is a need for the SIA to include an analysis of how changes may change (from negative to positive; from positive to negative) over time, and how change may be multifaceted in terms of impact. Moreover, to include benchmarks and reference to other scenarios within the analysis would enable the development of more thorough and advanced mitigation strategies. There remains no ranking or prioritisation of the social impacts and stakeholder feedback remains limited. All of this should be expanded on in the RIS, if data is available, or an expansion on the SIA should be expected.</p> <p>It should also be noted that whilst assessing health impacts was not noted as a specific requirement in the SEARs, health is intimately intertwined with social and environmental impact and I would argue that the proponent's claim that there was no need to assess health because of the lack of a specific requirement undermines the</p>

<ul style="list-style-type: none"> • lack of 'no development' scenario; • relevance of managerial impacts; • no health impacts. 		<p>SIA. A good SIA requires, as stated by Esteves, Franks and Vanclay (2012), an integration of social and economic variables with environmental, health and cultural heritage issues. A SIA has, as Vanclay (2003), argues, strong links with health and mental health impacts and a limited view of the SIA, such as that presented in the RIS, creates demarcation problems about what the social impacts are. Health, in this instance, relates to wellbeing and a state 'of complete physical, mental, social and spiritual wellbeing and not merely absence of disease or infirmity (Vanclay 2003: 6) and an SIA should strive to provide the analysis to ensure that people 'get to live in an environment which is conducive to good health and to a good quality of life' (ibid: 9). The social dimensions of the environment—including, but not excluding to, peace, quality of social relationships, belongingness, and freedom from fear—are central aspects of people's health (ibid: 9)^{iv} The refusal to adequately consider 'health' as a variable of the social is, thus, a significant problem with the SIA and points to the critique of the limitations in analysis and scope.</p>
<p>Cumulative impacts and impact on community (5.25.5).</p>	<p>Proponents points to Section 5-9 of the SIA in response to this concern, arguing that the cumulative impacts are discussed herein.</p>	<p>The analysis of cumulative impacts in the SIA is inadequate and referring back to the SIA as the point of reference is misleading.</p>
<p>No consideration of solastalgia (5.25.7)</p>	<p>Argues that solastalgia is considered in the SIA and that the potential impacts on the community liveability are considered in section 10.3.1 of the SIA.</p>	<p>Whilst the SIA discusses how the existing Bylong Valley community will be required to cope with change, this is not an adequate analysis of solastalgia. Solastalgia refers to the sense of <i>solace</i> (comfort, consolation, relief) that people get through their connection to sense of place. Identifying potential and unfolding changes to place is not enough to be considered an analysis of solastalgia, and this points to what I have argued elsewhere in this submission as a shortcoming of the SIA and the RTS. Solastalgia is linked to experiences of displacement in place or homelessness when still at home; it points to how physical changes lead to a sense of disconnection between self and place, as it is linked in with past history, present reality and future opportunities and aspirations. None of this is included in the SIA or the RTS yet it is a key social impact of a development of the kind proposed by this project.</p>
<p>Suitability of shift based operations in rural environments (5.25.8)</p>	<p>It is economically unviable to restrict the project to daylight hours, and the shift workforce is essential for a 24 hour mine operation.</p>	<p>The proponent's response poses is valid but it does not assess the concern about shift based operations and the impact this will have on rural environments etc. adequately through a ranking of social impacts – positive and negative – as they</p>

		relate to the environmental and economic impacts associated with continuous operations.
Community health and wellbeing, particularly the farming sector, as a result of changing landscapes (5.25.9)	<p>KEPCO emphasises its commitment to mitigation of social impacts through the SIMP.</p> <p>Voluntary groups such as Men's Shed and Beyond Blue provide established offer of support for communities.</p> <p>A number of actions aimed to achieve positive outcomes for the Bylong Valley community and Sub-Regional Area are listed, and ongoing consultation with stakeholders will take place.</p>	<p>Part of the problem with the RTS is that it states a commitment by the proponent to address issues through plans that will be developed and approved, such as the SIMP. Whilst a number of the actions outlined in the response are welcomed initiatives to address issues with community health and wellbeing exactly what these are, who they will be targeted at, the implementation and likely success at addressing the negative impacts and enhancing positive impacts are unclear.</p> <p>A key issue here is that the response does not separate between existing residents in the Bylong Valley, who will be more exposed to negative impacts, and those of the Local Area, which includes residents in Mudgee and Rhylestone (one hour commute from the Project boundary). The impacts in terms of community health and wellbeing on these communities are significantly different. This is a major issues as the mitigation strategies proposed are likely not to be effective, let alone possible, within the Project Area which is the community that endures the most severe negative impacts.</p>
Loss of employment in farming and equine industries	The main negative impact of the project on jobs relates to displacement of agricultural land uses on the land occupied by mining operations. This is addressed in the EIA. The job losses in the agricultural sector only represent 2.7% of the jobs to be generated from the project within the region.	<p>It is unclear how the relative figure of employment generated by the project versus job losses in agricultural sector is generated and, moreover, how longevity of agricultural employment versus the temporality of project-related employment is taken into consideration.</p> <p>It is also important to note that the loss of jobs in farming and equine industries is not only a matter of employment and economic but something that matters in terms of thinking about a place and a region. As a traditionally agricultural area with a proud history of horse breeding, losing the equine industry and reducing farming will change the meaning of the place. This may have social impacts that should be investigated further.</p> <p>Farming is not just a matter of employment; for many, it is a lifestyle associated with a distinct type of environment. This environment will change with this project and this could be something that can impact people's sense of place and wellbeing.</p>
Impact on tourism attributes of the Bylong Valley	The mine plans, operational methods and infrastructure design has been established to minimise impacts on tourism. Visibility of the mine from the road will be minimal and, thus, will not affect the travelling	The response to the concern about impacts on tourism is essentialist and it reduces the notion of tourism to driving on Bylong Valley Road. The Valley has already lost some of the accommodation used by tourists to the project, and it is problematic to assume that people will not sense the presence of a coal mine and that this will not affect people's decision to visit the area (rather than just driving through).

	experience along the Bylong Valley Way.	
Community Investment Fund (CIF) – more information needed.	A list of supported local community groups is provided and it is stated that information regarding the investment progressed through the CIF will be available on project's website.	The information requested is required. It would be beneficial to see a greater analysis of how the CIF can/will be used to mitigate negative impacts in the Bylong Valley and provide new opportunities for and enhance livelihoods for those who live there, if these can be argued exist.
Displacement of rural population	Refers back to section 4.2.7, which addresses the failure of the SIA to address cumulative impacts.	The section that is referred to does not refer to the question of displacement of the rural population. Instead it refers back to section 5-9 of the SIA, in which community issues, values and aspirations, population and demographics, population change and management commitments, economic vitality and labour markets are discussed. Neither of these sections deal adequately with displacement as a phenomenon (see 5.4).
Rural amenity must be ensured and no noise or air quality impacts should go beyond the project boundary.	The project is not predicted to contribute to air exceedances of the relevant air quality criteria for private residents; residents within the impact zone will be entitled to voluntary at-property mitigation and acquisition rights.	The notion of mitigating noise impact by offering voluntary acquisition rights is problematic. Whilst the residents that are affected should get acquisition rights, it is important to note that purchasing more properties will further reduce the social cohesion of Bylong Village and it may have a distinct social and health impact on those who are required to move in its own right. The mitigation strategy assumes that people wish to leave and, moreover, that leaving is in this instance a matter of choice. This is problematic and the scholarship on migration and resettlement (e.g. Koser and Martin 2011; Muggah Vullnetari 2012; Muggah 2015) show that the issue of choice and force overlap and that in many instances, particularly in relation to development projects, the notion of 'voluntary acquisition', 'resettlement' and 'choice' conceals experiences of force (see 5.4). ^v
Property impacts (5.25.18-21)	The four submissions that raises concern the impact on specific properties are addressed with cross-referencing to various sections if the RTS and the EIS.	In relation to the proponent's response to the concerns about specific property impacts, it is worth noting how these all present examples and evidence of the insecurity and ambiguity that landholders in the Bylong area endure. The insecurities of how the development will affect their livelihoods, land and community are in themselves a social impact that affect social cohesion and individual's wellbeing. This is not problematised or addressed in the SIA or the RIS.

3.0 Peer-review and Response to Peer-review

- The peer review of the SIA, conducted by Elton Consulting, identifies the following key concerns in relation to adequacy, gaps and areas for additional research. These include:

- The need for a more fine-grained evaluation of community feedback and documentation of local stakeholders to better present the qualitative information and community voices, and ensure views expressed in consultations are reflected in mitigation and management measures.
 - Lack of evidence base drawn from documented social impacts and benefits of other mining projects, including experience of WAFs.
 - No information on community health.
 - Little discussion of or appreciation of the social impacts arising from bio-physical factors and reliance on cross-referencing to original technical documents, which underplays the social significance of these matters.
 - Little weight given to the significance of the community views articulated by residents in the Project Area and no weighting or scaling of impacts according to proximity to the development and subsequent severity of impact.
 - Little information about the depth and intensity of concerns and the sensitivity of the cumulative changes already underway and expected to continue.
 - Exclusion of key social impacts in the analysis, including significant effects of historical property acquisition on community structure and the effects of the community engagement process itself.
 - Community engagement process for SIA has fallen short of professionally accepted standards for accuracy and completeness of information provided and transparency of process, evidenced in local residents' inability to contribute to an informed discussion about project's likely impacts on daily lives and activities.
- The peer review concludes that the reader is left with a poor understanding of the process and the significance of the cumulative change, social significance of bio-physical impacts on the lives of local residents. The reader is also left with limited insight into the effects of the development and associated land acquisition, environmental and social processes on stress and change within existing population, and the potential for future community revitalisation.
 - As an experienced social researcher, I agree with Elton's conclusions about the shortcomings of the SIA (details above). Whereas the Response to Peer Review of Social Impact Assessment developed by Hansen Bailey emphasises shortcomings of the Peer Review, it should be noted that much of this critique is based on the idea that Elton conducted an alternative SIA. This was not the case; conversely, as articulated in the peer review report and during consultations (which I sat in on), the purpose of the peer review was to assess an independent peer review of the SIA and the RTS, not conduct an alternative SIA. The major weakness in the SIA and the RTS is how it treats the Project Area. It is important to note that the Project Area is not the same as the Local Area, which is often referenced in the Proponent's SIA documents. In contrast to the Local Area, which includes residents and communities an hour commute from the Project boundary, the Project Area refers to the Bylong Valley—that is, the community and residents who are within the vicinity of the proposed mine and directly affected by the project and that are in direct competition of resources.
 - In relation to the above point, it is important to note that most of the key issues raised by the Proponent in their response, including that of the scope and methodology; geographical scope; and social baseline considerations, is misplaced. It should also be noted that the findings of Elton through consultation with the Bylong Community reflect similar issues to those identified by Hanson and Bailey and the critique points not to the use of methods (which Elton argues are adequate) but rather to the superficiality of the analysis and lack of consideration of cumulative impacts and the depth of the locally felt and feared negative impacts.
 - A key problem is that much of the criticism raised by Elton's peer review and other submissions is that there is a call for greater emphasis of the negative impacts on the community most closely to the project boundary (Bylong) and consideration of cumulative impacts. The nature of the proposed development, being a green field mine in a historically agricultural area and, to date, relatively protected from the surrounding coal mining activity, requires a better conceptualisation of 'community' and 'area'. A key

problem, which is identified in the peer review, is that the negative impacts on the Project Area (Bylong) are placed on a balance sheet with the positive impacts of the Local Area (1 hour commute from the Project Area, including Rhylstone and Mudgee). It is imperative to identify, weight and rate the impacts—negative and positive—within each of these areas independently before a comparative analysis of the greater region can be conducted.

4.0 DPE Assessment Report

- In this report, the NSW Department of Planning and Environment presents its final assessment of the development application, EIS, submissions, RTS, and a range of additional information. The Department acknowledges how social dynamics and community cohesion has substantially changed due to land acquisition required for the project and how there are significant ongoing concerns over future social impacts (p.8, 118). Whilst recognising the impact the project has had and is projected to have on local sociality, rural landscapes, connectivity, relationships, and sense of place, it is stated that this reduction is not solely project related. This is problematic: whilst there is a trend for rural decline in NSW, Bylong is a place that has been attracting new landholders in the last ten years—despite the potential of a mine—and the closure of the school and loss of social services cannot be seen as unrelated to the mining interests in the area. None of the social studies related to the Bylong Coal Project presents an informed analysis of projected rural mobility—in and out—in a no-mine scenario. The proximity to Mudgee, which is used as an argument for why the mine should go ahead, can be used as a counter argument for thinking about possible rural revitalisation of this particular area, which is one of a kind of the region. The basis of the Department's assessment on this regard is, thus, hypothetical and further analysis and study would have to substantiate the idea that Bylong would be facing depopulation if there was no mine.
- The condition about future land acquisition to mitigate noise and air impacts (e.g. p.118) is problematic as this will have a social impact in its own right. The proposal to mitigate noise impacts at significantly affected properties will further reduce the number of local landholders and potentially remove local knowledge of the area. The implications of this is not considered in the social impact assessment, yet it is a significant measure. It requires further consideration about how the potential hollowing of the community will be addressed, mitigated and managed. The failure to adequately address this is evident in the neighbouring village, Wollar, where Peabody's proactive purchasing strategy, supported by the Department, has left the community unviable. It is essential to better investigate the cumulative impacts of resettlement and how to mitigate and manage the social impact that comes from relocation of local residents. This strategy points to physical resettlement planning, which is concerned with how to ensure the preservation of the existing social fabric in both new and old locations (Reddy, Smyth and Steyn 2015).^{vi}
- To be able to adequately assess the social impacts and to review the projected success of mitigation strategies, the SIMP should be developed prior to approval. The lack of a SIMP prior to approval will expose the local residents, particularly those within the vicinity of the mine, to unnecessary risk and increased stress. After two years of working with the community and seeing the impact that the planning process is having on the community, I feel confident in arguing that the physical, mental and economic health of remaining residents will be jeopardised if no real and binding requirements for mitigation are established prior to approval
- The discussion about agriculture and the impacts that the Project will have on land use and, more specifically, Tarwyn Park property refrains from dealing with the role that agriculture plays in terms of the meaning of place and the identify of the region. Conversations with local residents that I have had as part of my research subsequent to the sale of Tarwyn Park suggest that KEPCO does not have the required expertise to continue the natural sequence farming practice of the Andrews family. Whilst it is a stated commitment of KEPC to maintain and monitor the natural sequence farming techniques and providing access to external groups for ongoing research, the details of this is vague. Further information is required how KEPCO will protect Tarwyn Park, give access for researchers and groups, and maintain the unique farming practice.
- Heritage impacts are not considered from a social impact perspective. The proposal to establish a recording and salvage program for Aboriginal sites should not be the first option for mitigation. The exhumation of burials have potential impacts on local residents and families living elsewhere. The social impacts that this may have on local residents and families are mentioned but greater weight to how this relates to heritage and construction of place should be forwarded in the assessment.

- The presentation of workforce numbers on p.17 is misleading.
- There is no assessment of long and short term factors in the discussion of agricultural impacts (6.4).
- The discussion of traffic impacts (p.107) should further identify the social impacts that changes to traffic volumes will have on local residents on Bylong Road and Wollar Road, as well as residents in Wollar and Bylong. The increased traffic (461%) is significant and will change the nature of and increase risks in the villages that the traffic will go through. The Wollar Road through the Munghorn Gap Nature Reserve would require improvement. It should be noted that whilst the population that will be impacted by the increased traffic is small, this represent a demographic that has already endured significant stress and disadvantage due to mining activity in the region.

5.0 Other observations

5.1 Gag clauses

- It should be noted that because of the gag clauses put on landholders that have sold, there is a lack of voices in the public domain from people who have been and are negatively impacted by the proposed development. During the course of my research in Bylong, I have met a number of former residents who have been forced to sell. Many of these have expressed a desire to voice their concerns about the significant impact that they are enduring to the PAC, yet are not able to do so because of contractual agreements in relation to the sale of their property.
- In regards to this, is also important to note that whilst the former residents have reached an agreement with KEPCO and sold their properties, this is generally not a voluntary process characterised by choice. The landholders that I have spoken with over the past two years have expressed significant distress about the situation and the continued ambiguity surrounding the future of the place, as well as pressure placed on them to sell, have forced them out. People describe this experience as being 'refugees in our own homes' and the stress the decision to sell is the result of their mental, physical and financial health being affected to the extent they no longer feel they have a choice.

5.2 Social as a secondary concern

- Whilst significant efforts have been put in place by the Proponent and the DPE in relation to assessing social impacts, the social appears to remain at a discursive level where the different sides of the project engage in a 'war of words'. A good example of this is the RTS for the Bylong Coal Project, where the Proponent responds to the criticism and concerns articulated in submissions by referring back to the SIA; which is the document that the submissions are criticising for lacking in respect to assessment. When, for example, the SIA is criticised for an inadequate analysis of cumulative impacts, the Proponent refers back to sections 5-9 of the SIA and states that cumulative impacts are assessed within these. This is not the case; there is no meaningful assessment of cumulative impacts, as evidenced by the lack of a risk matrix, if nothing else. The multiple documents developed in relation to the social engages with the core question of 'how will this project impact individual's wellbeing' but it omits a distinct assessment of the data that are presented in response to this. Ultimately, this must be seen in relation to the vexed nature of the question in the first place and the implicit comparative element of a SIA.

5.3 Co-existence and local identity: loss of equine industry and risk to heritage of Tarwyn Park

- Negative social impacts of the project must be seen in context of the localised land use conflict and competition triggered by the proposal. Approval of the project is, essentially, to prioritise this area—historically known for its agricultural production—for extractive industry.
- Whilst co-existence is flagged as an opportunity, the reality of this is slim. For example, as is stated in the DPE Preliminary Assessment Report, the equine industry has already fallen victim to the extractive interests in the area, with an accelerated decline due to land acquisition for the Bylong Coal Projects. As identified by the DPE, the Bylong Valley area is part of an Equine Critical Industry Cluster (CIC), which points to its role in contributing to the identity of the region and providing significant employment opportunities.

- The loss of the equine industry and the threat that the project poses on Tarwyn Park—which has been developed as a unique landscape for distinct agricultural methods (natural sequence farming), holds heritage value as a stud farm and is the burial home of one of the regions great champion horses—is as such not just an economic matter but also one of significant symbolic importance. The loss of this industry within the valley, as well as the future reduction of agricultural production, transforms this landscape and reduces its value as a place that contributes to regional identity and sense of place. The implications of this are not considered in the social impact assessments for the project.

5.4 Depopulation, resettlement and displacement

- The fact that the project area has no former history of coal mining is an essential fact that is not problematised in terms of its social impact. The mine will introduce a new land use in a predominantly agricultural setting. A previously vibrant rural community has become depopulated, with local people being bought out. It is deeply concerning that the DPE appears to be celebrating the acquisition strategy of KEPCO, which has led to the majority of freehold land now being in the hands of a coal company.
- Considering the lessons from the neighbouring village, Wollar, the DPE should be aware of the distinct social impacts that are embedded within this strategy and a proactive response to the implications this is having and will have on the local community should be forwarded. As local residents have been bought up, the community has not just lost numbers but also key individuals who have been central to the sociality of the community. Those who remain have not just lost neighbours, but also friends and relatives who made the place what it is.
- There is a distinct social impact embedded in the resettlement of the local community that is not addressed in the SIA and that will not be mitigated by the strategies proposed. This must be considered seriously before any decision can be made; the hollowing of the community is making people exposed to new vulnerabilities and risks that must be adequately considered and assessed. It should also be noted that the ambiguity that the local people in Bylong has been living with for an extended period of time has significant impact on people's wellbeing and ability to get on with both their professional and private lives. This is not acknowledged in the SIA or by the DPE but is an important impact that should be addressed.
- Displacement does not feature as an issue in any of the documents outlining and discussing social impact of the Project. This may be a reflection of a restricted understanding of the phenomenon of displacement, which is approached as an unproblematic movement of people or artefacts in space. Displacement is, however, not simply about movement of people from one place to another. Conversely, as scholarship on migration, displacement and resettlement show (e.g. Malkki 1992; Albrecht 2005; Bakewell 2011; Muggah 2015), displacement can happen when people are still in place and may manifest as a lived experience, conditioned through the spatial, temporal, cultural, and social specificities in which individuals experience their everyday life.^{vii} Displacement is, thus, not something that is simply a matter of movement in space; conversely, the condition of displacement—characterised by distress and disruption associated with a sense of lost home, powerlessness, hopelessness and lack of autonomy to decide own future—is a state of being that can happen to people in response to significant changes in natural, cultural and social milieus. There is no recognition of displacement as a condition in any of the social impact assessments conducted for the project.
- The social impact assessment for the Project is characterised by a lack of attention paid to resettlement and displacement. The word 'displacement' barely makes it into the reports and, when it does, it is kept at a technical level and the embodied, lived experience of changes to place is underplayed. The word 'displace*ment/*ed' features on only a few occasions in the SIA. On the occasions it is mentioned, it refers to:
 - future property acquisition (p.68);
 - mine closure impacts (p.85);
 - increased demand of social housing for lower socio-economic groups pushed out of public housing market during peak operations (p.149; 214);
 - community sustainability and cohesion (p.162); and
 - property acquisition (p.162-3).

Whilst the SIA problematises and describes existing and future displacement of people, this refers only to processes of physical movement and resettlement, and the sense of displacement that can happen when still in place remains under-explored.

- A sense of lost place and displacement saturates the stories of the people whom I have spoken with, and people express a ambiguity and limbo that is affecting their mental health. This is intimately tied to the slow and gradual depopulation of the community. It should be noted that the sense of displacement and limbo was particularly prevalent in the Upper Bylong area, where most of the residents by now have been bought out. The distress placed upon these people and the subsequent impact the depopulation of the area will have on those who remain is not considered adequately in the SIA.
- Since the late 2000s, mining-related resettlement and displacement of the population living within the vicinity of the project area have taken place. The onus has, in this process, been placed on the individual land holder and the Proponent. Through the voluntary acquisition policy, the responsibility (and success) of negotiation has been placed on the individual landholders. This process has reduced transparency and exposed the community to distress; it has not supported a fair and equal process. Moreover, gag-clauses (see 5.1) have disempowered the local community in their efforts to deal with the proponent.
- The lack of an a priori resettlement plan is central to the sense of limbo and distress that residents have been exposed to. What is happening within the community today and the vulnerability that the community is facing in relation to the proposed development relate to negligence of resettlement as a distinct feature of the Project. I would argue that this failure in the planning process bestows a distinct responsibility on the NSW Government to ensure the wellbeing of the remaining people in Bylong and the immediate villages (in particular Wollar, which will be left even more stranded subsequent to the depopulation of Bylong) and a decision should not be made until an adequate mitigation plan has been established.
- Whereas it is suggested that existing social impacts in Bylong are tied to a general trend of rural small town decline, the sense of displacement endured by local residents and the future decline of the Bylong community cannot be seen as independent of KEPCO's purchasing strategy and the fears people have about having a mine as next-door neighbour. Weaknesses in the safeguards in mining have exposed the people of Bylong to unprecedented harm, with the depopulation and resettlement of a significant portion of the community happening without any proper planning or protection established for the people who are outside the acquisition zone or without strategic relevance to the proponent

5.5 Greenfield mine in 2017

- The proposed mine is a greenfield mine that will radically transform a rich agricultural landscape with distinct heritage and significance. This very fact is hardly mentioned in the documents, let alone problematised. NSW Government and the PAC are bestowed with a moral responsibility in this instance. Approval of a greenfield mine in 2017, when the world is moving to alternative energy sources and the impacts of climate change is felt across the globe, will have impacts beyond what is considered in the social impact assessments for this project. This is yet another issue that is not dealt with in the assessments of the project, yet one that could have significant political impacts through the distinct signal that it will send to the public about the Government's commitment to a sustainable future.

6.0 Conclusion

In light of the evidence provided in this submission, it is in my professional view that the social impacts of this project remains poorly understood and assessed. The impacts on the local community—Bylong Valley—is significant and the project will jeopardise the future of this community as an agricultural farming community. I argue that the SIA for the project does not adequately consider and has not actually assessed the significance of the social impacts of the project.

Kind regards,

Dr Hedda Haugen Askland

CandMag MSocSci PhD (Sociology/Anthropology)

Senior Lecturer in Anthropology

Research Lead, Centre for Social Research and Regional Futures

The University of Newcastle

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- ⁱ Vancay F. 2003. International principles for social impact assessment. *Impact Assessment and Project Appraisal* 21:1, 5-12.
- ⁱⁱ Burge, R. 2004. *The concepts process and methods of social impact assessment*. Washington, USA: Social Ecology Press
- ⁱⁱⁱ These points were made in the Byong Vaey Progress Association's final submission but are restated here as I would argue they have not been adequately addressed in the Response to Submissions.
- ^{iv} Esteves AM, Franks D, Vancay F. 2012. Social impact assessment: the state of the art. *Impact Assessment and Project Appraisal* 30(1): 34-42; Vancay F. 2003. International principles for social impact assessment. *Impact Assessment and Project Appraisal* 21:1, 5-12.
- ^v Koser K, Martin S. (Eds.) 2011. *The Migration-Displacement Nexus. Patterns Processes and Policies*. Volume 32, Forced Migration; Vuolteenaho J. 2012. Beyond choice or force: Roma mobility in Albania and the mixed migration paradigm. *Journal of Ethnic and Migration Studies* 38(8): 1305-1325; Muggah R. 2015. The unbounded space: a unified conceptualization of population displacement in Brazil. *Journal of Refugee Studies* 28(2): 222-237.
- ^{vi} Reddy G, Smyth E, Steyn M. 2015. *Land access and resettlement. A guide to best practice*. Sheffield: Greenleaf Publishing
- ^{vii} Maikk L. 1992. National geography: the rooting of peoples and the territorialization of national identity among scholars and refugees. *Cultural Anthropology* 7(1): 24-44; A Brecht G. 2005. Soasta ga. A new concept in health and identity. *PAN: Philosophy Activism Nature* 3: 41-55; Bakewell O. 2011. Conceptualising displacement and migration: processes, conditions, and categories. In K Koser and S Martin (Eds.) *The Migration-Displacement Nexus: Patterns Processes and Policies*. New York, Oxford: Berghahn; Muggah R. 2015. The unbounded space: a unified conceptualization of population displacement in Brazil. *Journal of Refugee Studies* 28(8): 222-237.

APPENDIX B

Dr Hedda Haugen Askland CV

DR HEDDA HAUGEN ASKLAND

/ Mayfield East NSW 2304 / Australia

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<https://www.newcastle.edu.au/profile/hedda-askland>

FORMAL QUALIFICATIONS

- 2010 PhD (Sociology and Anthropology).** The University of Newcastle (Award)
Thesis Title: *East Timorese in Melbourne: Community and Identity at a Time of Political Unrest in Timor-Leste*
- 2005 MSocSc (Sociology and Anthropology).** The University of Newcastle
Thesis Title: *Young East Timorese in Australia: Becoming Part of a Culture and the Impact of Refugee Experience on Identity and Belonging*
- 2001 Candidata Magisterii.** University of Bergen, Norway
Major: Social Anthropology

CURRENT EMPLOYMENT

Senior Lecturer (Anthropology)

School of Humanities and Social Science
Faculty of Education and Arts
The University of Newcastle

EMPLOYMENT HISTORY

- 2014** Lecturer (Anthropology), School of Humanities and Social Science / UON, Callaghan
- 2013** Research Fellow (Level B), School of Architecture and Built Environment / UON, Callaghan
- 2011** Research Fellow (Level A), School of Architecture and Built Environment / UON, Callaghan
- 2010** Research Associate (HEW Level 6), School of Architecture and Built Environment / UON, Callaghan
- 2009** Research Assistant (HEW Level 5), School of Architecture and Built Environment / UON, Callaghan
- 2006** Part-time lecturer and tutor, School of Humanities and Social Science / UON, Callaghan

RESEARCH EXPERTISE

Regional expertise: East Timor and Australia

Migration and displacement: exile and diaspora; transnationalism and translocalism; identity and belonging; movement and mobility; D/MIDR; political, social and environmental change; political conflict; place-based distress

Balanced land use: social impact; social change; local attitudes; land use change; land use conflict; co-existence; social impact; social mobilisation; rurality

Creativity and education: creativity and design; architectural and design practice; assessment; quality assurance; form and function

Research methodologies: ethnography; collaborative ethnography; para-ethnography; inter-disciplinary collaboration; qualitative research; mixed methods research; applied research; phenomenology

AWARDS AND FELLOWSHIPS

- 2017** Faculty of Education and Arts Dean's Award for Collaboration Excellence
- 2017** Visiting Research Fellow at the Department of Social Anthropology (SAI), University of Oslo (July-December)
- 2017** FEDUA Research Fellow (Faculty of Education and Arts Internal Fellowship, Semester 1 2017)
- 2016** Vice-Chancellor's Early Career Researcher and Innovation Excellence Award
- 2016** Research Fellowship (Internal, UON Central), which provided funds to buy-out teaching for one semester (S1 2016)
- 2010** AISBEE 2010 Best Paper Prize for the paper 'Changes in students' attitudes toward architectural education'. Published in Proceedings of the All Ireland Symposium on Built Environment Education (AISBEE): Abstracts and Papers, eds. T McLernon, D Hughes, R Eadie, L Scott. University of Ulster, Centre for the Study of Conflict
- 2007** School of Humanities and Social Science Publication Prize for the paper 'Habitus, practice and agency of young East Timorese asylum seekers in Australia'. Published in Asia Pacific Journal of Anthropology Volume 8, Number 3, pp. 235–249
- 2005** Australian Government International Postgraduate Research Scholarship (IPRS) – 4 years
- 2005** University of Newcastle Postgraduate Research Scholarship (UNRS Central) – 4 years
- 2003** Overrettsagfører N. J. Martens og hustru Martens F. Koefoeds legat, Sorenskriver Joachim Monssens legat, Fridtjof Sundt legat, Signy og Ellert Wallendahls legat (grant, University of Bergen, Norway)

- 2002** L. Meltzers Høyskolefond (scholarship, University of Bergen, Norway)
2001 L. Meltzers Høyskolefond (scholarship, University of Bergen, Norway)

GRANTS AND FUNDING

Funding obtained

Total number: 17

Total amount: AU\$334,788 (excluding RES and READ Panels)

- 2018** Faculty matching funding for UON PRC Scheme – Centre for 21st Century Humanities (Value: \$100,000)
2018 UON FEDUA Conference Travel Grant – **Askland HH**. Max Planck Institute for Social Anthropology Colloquium Fuelling the Future: Energy Resources and Environment, Halle, Germany (Value: AU\$1656)
2018 Centre for Resources Health and Safety (CRHS) Project Support Funds (Value AU\$2000) - Rich J, **Askland HH**, Chiong R, Lockart N, Maguire A. 'Modelling climate-change driven human displacement in the Hunter region of NSW: Developing key partnerships in preparation for an ARC Linkage grant'
2017 DVC-R Early Career Researcher Grant (Value AU\$50,000) – **Askland HH**, Chiong R, Lockart N, Maguire A, Rich J. 'Modelling climate change-driven human displacement in the Hunter region of NSW: An interdisciplinary assessment of risks and adaptation strategies' (Value: AU\$50,000)
2017 UON FEDUA Strategic Networks and Pilot Projects (SNaPP) Grant – **Askland HH**, Maynard J, Bush R, Larsen BR, White Z, Howard A, Blakemore T, Sobel-Read K, Stolk P, Grimstad S, Kohne M, Sherval M, Askew M. 'Rural Land Use and Community Research Network' (Value: AU\$13,700)
2017 UON FEDUA Conference Travel Grant – **Askland HH**. SfAA 77th Annual Meeting. Trails, Traditions, and New Directions. Santa Fe, New Mexico, USA (Value: AU\$2,000)
2017 Askew M, **Askland HH**, Blakemore T, Hayes A, Loxton D, et al. Research, Evaluation and Data (READ) Panel. Australian Government Department of Social Services (DSS).
2016 UON FEDUA Conference Travel Grant – **Askland HH**. EASA Biennial Conference 2016. Anthropological Legacies and Human Futures. Milan, Italy (Value: AU\$2,000)
2016 UON FEDUA Strategic Networks and Pilot Projects (SNaPP) Grant – **Askland HH**. 'Eritalgia: mining and the disruption of future selves' (Value: AU\$5,000)
2016 Australian Government Department of Employment Research and Education Panel. Refreshable Panel for Research and Evaluation Services (RES Panel). Askew M, **Askland HH**, Brankovic L, Chalup S, Farrugia D, Foley D, Germov J, Gore J, Gray M, Heinsch M, Holbrook A, Howard A, King R, Mendes A, Nilan P, Smith M (10 year panel with annual research income AU\$100,000< per year).
2015 FEDUA New Staff Grant – **Askland HH**. 'Land use, kinship and migration: large-scale resource extraction and the question of home' (Value: AU\$4,981)
2015 NSW Department of Primary Industries – **Askland HH**, Askew M. 'Small Holdings Project' (Value: AU\$52,884)
2015 NSW Department of Primary Industries and UON – **Askland HH**, Askew M, Farrugia D, Sherval M, Coffey J, Threadgold S. 'Local attitudes to changing land use – Narrabri Shire' (Value: AU\$49,923)
2015 UON FEDUA SNaPP Grant – Threadgold S, Nilan P, Coffey J, Farrugia D, **Askland HH**. Newcastle Youth Studies Group – Theoretical Innovations and Challenges in Youth Sociology: One Day Symposium (AU\$15,000)
2014 UON FEDUA SNaPP Grant – Nilan P, Threadgold S, Furlong A, Farrugia D, Coffey J, **Askland HH**, Rodriguez L – Network for Youth Research Outside the Northern Metropole (Value: AU\$15,000)
2012 UON Linkage Pilot Research Grant – Chapman M, **Askland HH**, Awad R. 'Structures of Architectural Practice: an ethnographic study of six design practices in Sydney' (Value: AU\$10,000)
2012 NSW Architects Registration Board Grant – Chapman M, **Askland HH**, Johnston L, Awad R. 'Structures of Architectural Practice: an ethnographic study of six design practices in Sydney' (Value: AU\$10,000)
2012 University of Newcastle New Staff Grant – **Askland HH**. (Value: AU\$3,000)
2012 FEBE Teaching and Learning Conference Grant – Chapman M, **Askland HH**. (Value: AU\$712)
2012 FEBE Research Conference Travel Grant – **Askland HH**. Australian Anthropological Society Conference 2012. Culture and Contest in a Material World, The University of Queensland. (Value: AU\$1,500)

SUMMARY OF MAJOR PUBLICATIONS

[Complete list of publications and selected conference papers available at:

<https://www.newcastle.edu.au/profile/hedda-askland#publications>]

Publication merits

Total number of publications: 62 (excluding conference papers)

Citations (2018, total/last five years): 190/155

h-index (total/last five years): 8/7

i10 index (total/last five years): 7/6

INVITED PRESENTATIONS

- 2019** [*forthcoming*] Invited presentation and paper at the *Deexceptionalising Displacement? Precarity and Mobility Symposium*, University of Pittsburg. USA, 21-23 March 2019
- 2018** Presentation at the 2018 Joint Institutes Colloquium, Max Planck Institute for Social Anthropology and the Institute for Social and Cultural Anthropology, Martin Luther University Halle-Wittenberg. 'Living at the coal frontier: *eritalgia* and the loss of an anticipated future', 12 June
- 2017** Presentation at the Workshop 'The Coal Rush and Beyond: 'Mined out: mining and displacement in rural New South Wales'. 13-14 November 2017, Institute for Advanced Sustainability Studies, Potsdam, Germany
- 2017** Seminar at the Department for Social Anthropology at the University of Oslo, Norway: 'Wollar and Goliath: mining, movement and materiality', 18 September 2017
- 2017** Seminar at the Department for Social Anthropology at the University of Bergen, Norway: 'An ethnography of loss: mining, conquest and time', 5 October 2017
- 2016** Presentation at the Hunter Valley Train Journey: 'Understanding the social impact of mining: *eritalgia* and the notion of lost future'. Invitation to give a presentation to local community members as part of a heritage train trip through the Hunter coalfields hosted by the Wollar Progress Association, Lock the Gate, 350.org and Nature Conservation Council, 28 August 2016.
- 2016** Interagency briefing to NSW Government: 'Local attitudes to changing land use: the Narrabri Shire'. Invitation to deliver a one-hour presentation of the findings and final report of the research project Local attitudes to changing land use: the Narrabri Shire to representatives from a cross-section of NSW Government departments involved in land use policy and planning. Sydney, 29 July 2016. Co-presenter: Michael Askew
- 2011** Presentation to the Fakultet for arkitektur og billedkunst, Norwegian University of Science and Technology: 'Assessing Creativity'. Invitation to deliver a one-hour presentation to the Faculty for Architecture and Fine Arts at the NTNU in relation to faculty discussions on assessing creativity
- 2010** Presentation to COFA, UNSW, 'I Know it When I see It: Assessment Seminar 2010. Tacit Assumptions about Innovation and Creativity.' Invitation to deliver a one-hour presentation as the guest speaker at the UNSW Cross-Faculty Discussions of issues and assumptions about Assessing Innovation and Creativity.

PEER REVIEWER

Energy Research and Social Science; The Extractive Industries and Society; International Journal of Social Welfare; American Anthropologist; Geographical Research

RESEARCH HIGHER DEGREE SUPERVISION

Completed PhD (3)

- 2018** PhD (Sociology and Anthropology). Co-Supervisor. 'Consuming the "Other" to Heal the Self: Seeking Indigenous Amazonian Plant Medicine Ritual to Heal Western Maladies
- 2017** PhD (Architecture). Co-Supervisor. 'Going Digitally Native: An Ethnographic Study of Digital Technology in Architectural Education'
- 2016** PhD (Sociology and Anthropology). Co-Supervisor. 'Beyond Resettlement as Refugee: Enduring and Emerging Dimensions of 'Displacement' as Cosmological Rupture for Central African Refugee Women'

Current supervision (7)

- PhD (Sociology and Anthropology). Principal Supervisor. 'Animals, Politics and the Construction of Identity: Greyhound Racing in New South Wales'
- PhD (Sociology and Anthropology). Principal Supervisor. 'indigeneity, Mining and Displacement. Adani and the Wangan and Jagalingou People'
- PhD (Sociology and Anthropology). Co-Supervisor. 'Navigating the City and Negotiating (Un)Employment: A Study of the Labouring Subjectivities of Black African Youth in Newcastle, Australia'
- PhD (Architecture). Co-Supervisor. 'The Barun Identity: The Emergence and Development of Braun Design in the 1950s'
- PhD (Sociology and Anthropology). Co-Supervisor. 'Places to Go, Witches to See. Alternative Counter-Cultural Spiritual Practice among Australian Youth'
- PhD (Social Work). Co-Supervisor. 'The Causes and Consequences of Forced Migration in Zimbabwe'

PhD (Social Work). Co-Supervisor. 'Gender Relations in Homes of Refugee Male Survivors of Sexual Violence in Armed Conflict: A Study of Congolese Refugee Homes in Uganda'

Honours supervision

Sociology and Anthropology. 'Potions, Pendulums, and Plant Emojis: An Exploration of Witchcraft and Paganism in the Digitalised Age'

Sociology and Anthropology. 'Knitting a Revolution. Social Mobilisation, Political Activism and Growling Grannies'. Completed October 2017, Award: First Class, Faculty Medal

Sociology and Anthropology. 'Human Animal Relations in the Greyhound Racing Community'. Completed October 2016, Award: First Class

RESEARCH HIGHER DEGREE EXAMINATION

2017 'Getting the Science Right: Queensland's Coal Seam Gas Development and the Engagement with Knowledge, Uncertainty and Environmental Risks'. University of Queensland (PhD, Sociology and Anthropology)

TEACHING

Undergraduate

- SOCA1020: Introduction to Social and Cultural Anthropology: Approximately 300 students, 10 units, face-to-face. Duties involve: course coordination, lecture and course development; lecturing and tutoring; marking.
- SOCA3850: Indigenous People in the Contemporary World: Approximately 25 students, 10 units, face-to-face. Duties involve: course coordinator; course development; lecturing and tutoring; marking.
- SOCA4090: Sociology and Anthropology Honours I: Approximately 10 students, 20 units, face-to-face seminars. Course aimed to advance students' knowledge and understanding about the history and philosophy of research in sociology and anthropology. Duties involve: course coordination; course development; delivery; marking.
- SOCA4100: Sociology and Anthropology Honours II: Approximately 10 students, 20 units, face-to-face seminars. Course aimed to build research expertise and technical skills in the disciplinary field of either sociology or anthropology using local and global contexts. Duties involve: course coordination; course development; delivery; marking.

Postgraduate

- SOCA6571: Development and Social Change: Approximately 20 students, 20 units, on-campus and Weblearn. Duties involve: course coordination; development of online and face-to-face teaching material; delivery of face-to-face seminars; online teaching; marking.
- SOCA6640: Social Science Research Methods: Approximately 20 students, 209 units, on-campus and Weblearn. Duties involve: course coordination; course development; online and face-to-face delivery; marking.

MEMBERSHIPS

2018-ongoing: Centre for 21st Century Humanities (C21CH), UON

2017-ongoing: Resource Extraction and Sustainable Arctic Communities REXSAC – A Nordic Centre of Excellence

2017-ongoing: Society for Applied Anthropology (SfAA)

2016-ongoing: European Association of Social Anthropologists (EASA)

2016-ongoing: EASA Anthropology of Mining Network

2016-ongoing: CRHS Environment and Health Working Group, ICBLU/NIER, UON

2016-ongoing: Intimate Histories, Living Stories Research Cluster (IHLS), UON

2014-ongoing: PURAI – Global Indigenous and Diaspora Research Studies Centre, UON

2014-ongoing: Centre for Social Research and Regional Futures (CSRRF), UON

2014-ongoing: Sydney Southeast Asia Centre (The University of Sydney)

2014-2015: Newcastle Youth Studies (The University of Newcastle)

2010-2011: European Association of Social Anthropologists (EASA)

2005-ongoing: Australian Anthropological Society (AAS)

2009-2014: Centre for Interdisciplinary Built Environment Research (CIBER), UON

2005-ongoing: Australian Anthropological Society (AAS)

2005-2010: Australian Network of Student Anthropologists (ANSA)

2005-2010: Australian Anthropological Society Postgraduate Subcommittee

2003-2009: Centre for Asia Pacific Social Transformation Studies (CAPSTRANS)

LEADERSHIP ROLES

2018-ongoing: Deputy Director, Centre of 21st Century Humanities (C21CH), The University of Newcastle

2018-ongoing: Project Director, Centre for Social Research and Regional Futures (CSRRF)

2018-ongoing: Honours Convenor (Sociology/Anthropology/Human Services), School of Humanities and Social Science, The University of Newcastle

2016-2017: Bachelor of Arts Working Group Member, School of Humanities and Social Science, The University of Newcastle

2016-2017, 2018 (ongoing): School of Humanities and Social Science Representative in the Faculty of Education and Arts Teaching and Learning Committee, The University of Newcastle

2016-ongoing: Australian Anthropological Society Institutional Representative

2016-2018: Research Lead, Centre for Social Research and Regional Futures (CSRRF)

2016-2017: Discipline representative (anthropology/sociology) in the Bachelor of Arts Working Group, Faculty of Education and Arts, The University of Newcastle

2010-2014: School Representative on the Faculty of Engineering and Built Environment Research Ethics Committee, The University of Newcastle

2005-2008: Secretary, Australian Anthropological Society Postgraduate Subcommittee

OTHER

2018: Expert Witness, NSW Land and Environment Court, Social Impact Assessment, Rocky Hill Coal Mine

2017: Expert Witness, Environmental Defenders Office, Social Impact Assessment, Bylong Coal Project

2016-ongoing: Australian Anthropological Society (AAS) Institutional Representative for UON

2016-ongoing: Editor, EASA Anthropology of Mining Newsletter

2016-2017: Advisor to the New South Wales Department of Planning and Environment on the Social Impact Assessment Guidelines for State Significant Resource Projects

2015-ongoing: Social Impact Assessment Advisor to various Progress Associations in the Hunter Valley and Mid-Western regions, NSW, Australia