



**SUBMISSION TO THE IPC FOR THE BYLONG COAL PROJECT, 7
November 2018**

Running Stream Water Users Association (RSWUA) strongly objects to the opening of a coal mine in the well watered, highly productive agricultural valley of Bylong.

RSWUA was formed over 26 years ago when a coal exploration licence was granted over the Running Stream/MtVincent area which is highly productive agricultural land with basalt soils watered by permanent springs. Any coal mine would threaten our springs and thus our association takes a keen interest in how coal mine applications are dealt with in relation to the protection of vital water resources. What we have seen so far gives us zero confidence that the government believes water resources should be protected for future generations to enable the growing of our food in the centuries to come. The Bylong Coal project is a case in point. Once again the short term economic benefit is given precedence over the environment and society.

The revised mine plan still does not resolve a number of critical negative impacts of the mine, nor has the further information provided by Kepco satisfactorily addressed these problems. The revised mine plan does little to lessen the impact on the Bylong River through both drawdown and mine water requirements.

To begin with there is no community trust in the water models or the peer review process. In this region we have seen on numerous occasions where water modelling and predictions have been plain wrong (Ulan and Moolarben mines). An independent review that tests the assumptions in the water model is critical to the final determination of the project.

The long term viability of the Bylong Water Source is under threat. The Bylong River is known to flow underground through its alluvial aquifer. Compromising the viability of the Bylong alluvium means compromising the river and the Bylong River water source, and that means compromising the agricultural industry which has been here for over 150 years and can continue for another 1250 years and beyond.

The Aquifer Interference Policy for both productive groundwater drawdown and salinity has minimum impact criteria which should not be exceeded yet this mine proposal is likely to substantially exceed these criteria. How can this be allowed? What is the point of having an Aquifer Interference Policy if its guidelines are totally ignored?

Opening a mine in the Bylong Valley, as the Commission stated, will fundamentally shift the valley from agricultural to mining pursuits. This should not be allowed in an area of highly productive agricultural land that has some of the best soils in the country. The whole idea (the community thought) of identifying and mapping Biophysical Strategic Agricultural Lands (BSAL) was so that these special agricultural lands would be protected for future generations.

Kepeco states that it will return these lands to 110% of their original value. Easy words! But there is no detailed description of how this is to occur, the costs of undertaking this rehabilitation and the risk associated with these activities. Even the Commission review was highly skeptical of Kepeco's promises to rehabilitate BSAL remarking that: "no mines in NSW have, to date, returned agricultural land or soil profiles to equivalence" with biophysical strategic agricultural land.¹

In addition, Kepeco proposes to tie up large areas of BSAL via their offsets strategy with 486.25ha of verified BSAL to be managed in the future to primarily deliver biodiversity conservation outcomes not agriculture. Already

¹ The HVO Alluvial Lands Reinstatement Project took ten years to rehabilitate just 63 hectares of productive alluvial farmland and has not been repeated. KEPCO is promising to do the same with 400.

locals have noted the decreased agricultural output on lands owned by Kepco. One estimate is by over one third.

Another major concern is the impact on Tarwyn Park - restoring the homestead is not the key heritage aspect of Tarwyn Park. The state heritage significance of Tarwyn Park is bound up with the availability of water and the ongoing process of Natural Sequence Farming (NSF). NSF is all about raising and maintaining the level of the groundwater in the landscape. Although the open cut has been moved a little further away Tarwyn Park still will be subject to the worst of the alluvial water drawdown.

There are still more issues with this mine, such as the impact on biodiversity and indigenous heritage, and unacceptable levels of subsidence. We will leave it to others to discuss those issues in greater depth.

In conclusion we see the decision on the Bylong Mine as being between short term economic benefit versus the long term (centuries) benefit of preserving a water resource that supports agriculture into the future. We implore the Commission and the government to acknowledge to mistake of having a Gateway Process that does not allow for a locked gate. This application should never have got past that process. Please have the courage to reject this mine.

Running Stream Water Users Association

14 November 2018