

## Aaron Brown

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**From:** Huw Kingston [REDACTED]  
**Sent:** Tuesday, 19 February 2019 3:19 PM  
**To:** IPCN Enquiries Mailbox  
**Subject:** Submission - Hume Coal Project & Berrima Rail Project from Huw Kingston

**Categories:** Aaron

Hello Commisioners

Firstly thank you for the opportunity to put in a submission to the Hearing on the Hume Coal Project and Berrima Rail Projects.

I have followed this project proposal with interest for many years now and was pleased to see the NSW Department of Planning and Environment has come out against the mine, recommending it not be approved. Their report clearly highlights problems with the mine, most alarmingly it's impact on the water resources in the region of the mine.

Water is life and in the driest continent on earth we need to secure our water resources. Recent issues in the Murray-Darling make that abundantly clear, a river system dying a death of a thousand cuts.

The project is predicted to have significant impacts on a highly productive groundwater aquifer including drawdown impacts on up to 118 privately owned bores. Both the Department of Environment & Planning and Department of Industry - Water consider that the predicted drawdown impacts on this aquifer would be the most significant for any mining project that has ever been assessed in NSW

In addition to the issues surrounding groundwater there is a substantial degree of uncertainty about the mine design and, in particular, the methodology underpinning the geotechnical model. The combination of an untested mining method [pine feather] and an unconventional method of storing large quantities of mine water underground is likely to result in serious operational safety risks. The Department of Environment & Planning considers that the various safety risks may lead to the transfer of additional mine water to the surface and a need to discharge into watercourses. The Applicant has not assessed this issue or proposed a water treatment plant.

The Department of Environment & Planning, the EPA and Water NSW consider that any discharge of mine water (whether treated or untreated) may result in significant impacts on surface water. Further, there is a risk that the operational safety issues associated with the unconventional mine design may result in an unexpected sterilisation of coal, which may significantly reduce the economic benefits of the project.

I believe that the economic benefits of the project may be overstated. The Department of Environment & Planning notes that there are fundamental difficulties in efficiently recovering the coal resource for this project, particularly due to the shallow depth of the coal and the risk of environmental impacts.

Importantly, even the Applicant's estimated net economic benefits of \$373 million is relatively low in comparison to many other coal mining projects in the Southern Coalfield and across NSW. The economic benefits do not outweigh the likely adverse impacts on the environment and community.

The NSW Department of Planning & Environment notes there is a threat of serious harm to both groundwater and surface water resources, and there is currently considerable scientific uncertainty about the level of environmental damage to both. As a result, the 'precautionary principle' is triggered so the project should not be considered an 'ecologically sustainable development'.

As the recent Land & Environment Court decision regarding the proposed Rocky Hill mine Gloucester noted, the impact of new mines on climate change cannot now be ignored. The people of NSW and across Australia are now demanding action on climate change.

Consequently, based on the information currently available, I submit that the project is not in the public interest and should not be approved.

Best regards

Huw Kingston

