

WOLLAR PROGRESS ASSOCIATION

C/O- POST OFFICE

WOLLAR NSW 2850

Submission

Independent Planning Commission Public Meeting
Mudgee on Wednesday 19 June 2019
Ulan Coal Mine MOD 4

Thank you Commissioners for the opportunity to represent Wollar Progress Association at this public meeting to hear the community's view on the assessment of the Ulan Coal Mine MOD 4 proposal.

It is not that long ago that we were before you in regard to the proposed Moolarben Mine MOD 14. We welcome the fact that there is some continuity of Commissioners considering the impacts of mining in this area, including the proposed Bylong Mine.

All these large coal mines are in the upper catchment of the Goulburn River. Wollar Progress Association has a direct interest in the planning and approvals process for these significant projects because their environmental and social impacts have been profound. Our members and community have been directly affected by the combined impact of these mining operations.

A key issue for us, is that these mines never stop expanding. Each modification causes an additional environmental and social impact on top of those already being felt. We are continuously spending our time reading copious documents of environmental assessment that focus on down playing the impacts rather than acknowledging their extent.

The assessment of Ulan MOD 4 is a perfect example of how each expansion is treated as an individual project, assessed as a minor incremental increase of impacts and argued away as being of no consequence – other than the royalties that will go to the State Government.

There is no compensation provided for our stranded community members reliant on the Goulburn River for basic water rights access, inconvenienced by more and more coal trains, while the district continues to be emptied out of mine neighbours and our village of Wollar has been decimated.

We objected to Ulan MOD 4 because it will increase the impacts on the Goulburn River.

Our submission noted that the Assessment Report prepared by Eco Logical Australia does not assess the combined impacts of surface flow capture and loss of groundwater base flows to the Goulburn River over the three operating mine sites.

The Response to Submissions Report and the Department of Planning Assessment Report do not address this important issue.

We believe that the total capture of surface water and groundwater across the three operating mine sites on the headwaters of the Goulburn River could amount to over 20 billion litres per year. This is a large amount of water to remove from the landscape of an unregulated stream that is totally reliant on rainfall runoff and base flows.

This annual volume of captured flow equals about four times the annual water usage of the Mudgee region from the Cudgegong River. The town water supply for Mudgee and Gulgong and the irrigation industry have some reliability because of the regulation through Windamere Dam.

The Goulburn River is unregulated. Therefore reliability of water access to downstream water users is variable and further threatened by the scale of water take into the large mining operations. Together they impact on 190 square kilometres of the headwater catchment.

The various exemptions provided to the mining industry under current NSW Government water policy have a direct impact on other water users who rely on the river.

It is only fair that independent decision-makers have a full understanding of the extent of these impacts so that the industry is managed under conditions of approval that mitigate or compensate those impacts.

We note that Ulan Mine is supposed to monitor impacts on water users. This is not happening.

The Response to Submissions claims to have dealt with the combined impact of the mines by reviewing stream flow at the mid river gauge at Coggan. This gauge is 125 km downstream from Ulan Mine and is below the inflow of the Munmurra and Krui tributaries.

Most of our members on the Goulburn River live above these tributaries and directly below the three mines. There is no other gauge of river flow or quality besides SW02 directly below Ulan Mine.

Therefore, the assessment of combined impact on surface flows does not address our concerns that the flow in the Goulburn River, particularly at times of low flow, is directly influenced by mine water discharge.

The Response to Submissions has failed to demonstrate that the cease to release event in December 2017 was inside the normal variability of river flow for the section of river above the tributary inflows where many of our members live.

The reporting on measurement of flow history in the river includes flow records from the discontinued monitoring at Ulan. This shows that the upper catchment had a good record of low flows before the mine. It was very convenient for this monitoring to stop once mining at Ulan commenced. Many of our members and associates have lived on the river before mining on such a large scale started and they've seen a marked deterioration in river health over the past 30 odd years.

It is important that natural low flows and base flows are replaced in the river by mine water discharge in a manner that reflects natural conditions. We are very concerned about what happens after mining ceases. How will these flows then be replaced? The ongoing destruction of the source of base flows to this river system cannot continue.

While the Response to Submissions emphasises that additional base flow loss from MOD 4 is minimal, it is an additional impact that has not been clearly added to the extent of losses now occurring in the river system.

The loss of low flows in the Curra Creek tributary through subsidence is an additional impact.

The fact that springs and alluvial aquifers are not included in the groundwater model means that important sources of base flows in the system are not even considered in the predictions

Wollar Progress Association believes that our members with basic rights on the Goulburn River should be compensated for loss of base flows through the regulation of all mine water discharge to the confluence of Wollar Creek so that a more natural flow regime is reinstated in the river.

We urge Commissioners to recommend the addition of environmental flow rules in the EPLs for mine water discharge from Ulan, Moolarben and Wilpinjong Mines.

Our other major concern is the decrease in water quality in the river over time. In the past we have seen salt slicks along the river bank for up to 25 kms below Ulan Mine. The salt load in the river system includes the high levels of salinity discharged prior to the Ulan EPL restrictions issued in 2003.

The combined load of salt entering the river from Ulan and Wilpinjong mine water discharges is significant and needs to be better controlled. Ulan Mine is the highest source of mine water entering the river system. The current control on salinity levels at 900 EC is three times the background levels above the mine.

We note that the Planning report comments that the salinity at gauge SW02 is lower than downstream. The increasing level of salt load in the river need to be measured below Wollar Creek. The EPA pointed out in a 2013 report that more gauges are needed in the Upper Goulburn catchment to measure increased salinity from the three mines.

Wollar Progress Association recommends that the maximum salinity level for mine water discharge is lowered to 500 EC. Our members rely on the river to grow food, water stock and use in our households, especially during the prolonged hard droughts we are now facing. We are directly impacted by the deterioration of water quality through increased salinity and salt loads in the river.

The long term health of the Goulburn River is critical to our survival. Critical human needs is a priority under the NSW Water Management Act 2000. We would appreciate the protection of our needs through stronger regulation of mine water discharge.

We note that the Department of Planning report has a heading in the Surface Water section for water users. The report concentrates on the lack of private landowners using water from Mona Creek and Curra Creeks impacted through subsidence. However, it also refers to water users downstream from the modification. There is a requirement under existing conditions to provide compensatory water supply to any landowner whose supply entitlements, including surface waters, are adversely affected by the project.

We consider that compensatory water supply to basic rights holders on the Goulburn River should be supplied through the return of base flows to the river and regulation of mine water discharge to simulate natural flow events with an EC level of 500 EC.

There is no strong argument for the need to further disturb our water sources through the Ulan MOD 4 proposal. Ulan Mine and Glencore already have approval to extract 28 million tonnes of coal per year for another 14 years until 2033.

By that time climate change will be such a huge impact on our lives and the Australian economy that any slight public benefit through royalties will be overshadowed.

I want my grandchildren to be able to enjoy a healthy Goulburn River like I and my children have in the past. The state of the river now is fairly disgusting.

Climate change is likely to further erode our access to water. No more water should be allowed to end up inside a coal mine.

The current impacts on the Goulburn River will last for generations. We have no idea what will happen once the mining companies pack up and move out.

Members of Wollar Progress Association appeal to you Commissioners to find that the current impacts on the river are more than enough. Ulan MOD 4 is an additional impact that cannot be approved.