



## INDEPENDENT PLANNING COMMISSION SUBMISSION POINTERS CHEAT SHEET

Now that the NSW Department of Planning & Environment has recommended that the Hume Coal Project and associated Berrima Rail Project NOT be approved, the Minister has requested the Independent Planning Commission (IPC) hold a public hearing into the project and determine Hume Coal's development application.

Because Hume Coal is asking people to write submissions supporting the mine ahead of the Independent Planning Commission's hearings, which will take place on Tuesday, 26 February at Moss Vale RSL, **Battle For Berrima is asking all members and supporters to WRITE MORE SUBMISSIONS AGAINST THE PROJECT**, even if you have already done so, because we must continue to demonstrate the strength of community opposition in the final stages of this process.

**STEP 1:** Review the below points you can make in objection to the projects

**STEP 2:** Click this link to write your quick submission <https://www.ipcn.nsw.gov.au/have-your-say>

\*\*Written submissions will be accepted until **5pm AEDT on Wednesday, 6 March 2019**.

## POINTS YOU CAN MENTION IN YOUR OBJECTION

### GROUNDWATER

- '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 and DoI Water (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'.
- 'While the proposed make good measures (e.g. deepening pumps or replacing bores) may be feasible from a strictly technical standpoint, the *NSW Aquifer Interference Policy* expressly contemplates the possible scenario where there are "no suitable or practical mitigation or prevention options", and the Department considers this project represents such a case.'
- And that 'the proposed make good process would inevitably result in a large number of negotiations and disputes with local landowners, unavoidable delays to the development of the project, and significant disruption to the community.'

## MINE DESIGN

- 'There is a substantial degree of residual 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 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, 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'.

## ECONOMIC

- 'The Department 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'.

## UNCONVENTIONAL MINE DESIGN

- Hume Coal's unconventional mine design presents a range of uncertainties and safety risks, as well as the likelihood of significant impacts on water resources. Consequently, the proposed project site is not suitable for the development of a new coal mine.
- The economic benefits estimated by Hume Coal's EIS cannot be realised without significant adverse impacts on the environment and the local community, particularly in relation to groundwater impacts. The economic benefits do not outweigh the likely adverse impacts on the environment and community.
- NSW Department of Planning & Environment 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'. Consequently, based on the information currently available, the project is not in the public interest and should not be approved.

Visit [www.battleforberrima.com.au](http://www.battleforberrima.com.au) for more details.