

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Environmental Protection (Underground Water Management) and Other Legislation Amendment Bill 2016 - Comment Greg King, Toowoomba
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Friday 7th October, 2016

**Research Director
Agriculture and Environment Committee
Parliament House
BRISBANE QLD 4000**

Reference: Environmental Protection (Underground Water Management) and Other Legislation Amendment Bill 2016

Dear Committee Sir/Ms,

I write with some of my concerns regarding the afore referenced Amendment Bill 2016. These concerns are that this as drafted is a Bill which seemingly duplicates other regulatory legislation regarding developments and in this instance particularly ground water.

I work in a senior project role within a coal mining company being New Acland Coal within the New Hope Group. I have worked for over 40 years in mining operations in a professional capacity in prime functions of mineral processing, coal mining and projects management. During this time and currently with New Hope I have had significant involvement with site water supply and management. New Acland Coal has now been in operation for over 14 years and the claimed groundwater intersections and worst case modelling is not borne out in real life groundwater inflows in to the pits. We find limited inflows and require significant external water to operate the mine and processing plant. This water is sourced from a waste product from the Toowoomba Wetalla Waste Water Reclamation Facility with no bore pumped water used on site by New Acland for the mining dust suppression or processing facilities. A small amount of basalt aquifer water is used for site potable and shower water after being treated through a site reverse osmosis water treatment plant.

One of my major concerns as a professional and also as a member of the Toowoomba and surrounds community is that this Bill as proposed may delay projects and particularly the New Acland Stage 3 expansion project which has already been through and in the final stages of a Land Court hearing. In the last 8 years or so New Hope have prepared a comprehensive EIS to cover all requirements of the Government various Terms of Reference for this expansion development. This EIS, associated studies and the Land Court process has given a thorough and comprehensive review of many factors, with groundwater being one of the major topic areas for the land court hearings.

The current Stage 2 of the mine coal reserves are close to depleted and even with ~10% reduction target for the next year below the permitted tonnage, in an attempt to stretch the current operations the mine will be unable to maintain more than half of this production after mid-2018 and then only for a limited timeframe with only one of the last 3 pits available with any coal. It is imperative that no further delay mechanisms are introduced in to projects that have been in the

approval phase for a number of years, well advance close to completion and of major employment and foreign revenue benefit to the Darling Downs, Qld and Australia.

The human consequences of this will be a significant reduction in employment and then a gradual wind down and loss of all of the current >350 jobs with full time NAC & contractor personnel, plus a significant number of part time contractors and consultants plus the external flow on employment with an operation of this magnitude. **Any such event would have a major effect on employment and business** in Oakey, Toowoomba and the Darling Downs and take an external export revenue stream at current production rates without increase of the order of >\$400 Million PA for the life of stage 3 away from Qld and Australia (Increase likely - production, coal price, foreign exchange rate).

It is imperative to development and business in Qld that this Bill is not added as a parallel to other processes of Development Applications and processes. It is essential that projects such as the New Acland Stage 3 Project or any other mining developments such as the Adani Carmichael Mine or the GVK Hancock Mine projects or any other affected advanced projects are not delayed as a result of this legislation. Should this legislation be introduced to require Associated Water Licences then this should not be in addition to existing DA requirements or studies or cause any delays in the progress of these projects.

Transition arrangements are required to ensure these delays don't eventuate. Legislation should not be introduced which duplicates water studies and requirements in general development applications, large mining EIS processes or Land Court hearings which comprehensively cover groundwater along with a myriad of other important factors with developments.

Any legislation which will further delay the New Acland approvals process or ultimately prevent the timely Stage 3 extension will place significant personal pressure on myself, all of the Acland employees and contractors employment tenure. Many businesses in Oakey, Toowoomba and surround and even further afield with suppliers and consultants will be placed in financial demise. As I am getting close to retirement than the concept of reducing our state and country debt is important and can only be done with reduced internal expenditure (Not the ideal outcome) or increasing export foreign revenue – the preferred option requiring Governments to start approving a number of projects, all of which seem to have stalled in the last few years due to a combination of restrictive legislation and stifling environmental challenges and objections.

With the extent of the Qld and Australian foreign debts at the moment then it is imperative that projects which raise external foreign revenue are preferably fast tracked and not delayed as is seemingly the case. These export projects are equally or more important than internal projects for the fiscal policy as bringing in genuine foreign funds to assist the balance of trade and not just circular money within the country.

To this end I summarise my main concerns with this Environmental Protection (Underground Water Management) and Other Legislation Amendment Bill 2016:

- **Transition Arrangements need to be included - The Associated Water Licences should be issued to projects which are well advanced and have addressed Ground Water issues as part of a DA or EIS and/or Land Court processes.**
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It needs to be noted that this Bill should not be in addition to other approval requirements i.e. Don't double up as this Bill in itself will become an instrument of delay for all projects.

- The New Acland Coal mine cannot accept any further delays without significant detriment to direct and indirect employment, Darling Downs and Qld businesses and suppliers and to Qld and Australia if NAC Stage 3 and other import revenue projects approvals don't start to happen soon.
- Legislation that allows appeal after appeal for resource or other projects whether gaining foreign revenue or not is to the detriment of our country.

Thank you for consideration of my submission.

Regards,

Greg King
Project Superintendent

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<http://www.newhopegroup.com.au/files/images/Newsig0916.png>



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