

Hon Brian Ellis, MLC,  
Chair, The Standing Committee on Environment and Public Affairs  
council@parliament.wa.gov.au

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March 15th 2011

Dear Mr Ellis,

Petition No. 107- Proposed Coal Mine at Osmington Margaret River

Petition no 107 was tabled by Hon Adele Farina MLC in the Legislative Council on 15th February 2011. However your letter requesting a written submission at stage 2 was received only this week, and we find it difficult to mount a sustained argument in such a short time. We are therefore sending this by email and will forward a signed letter by post. We have not taken our complaint to the Parliamentary Commissioner for Administrative Investigations (Ombudsman)

The signatures on the petition indicate strong opposition to the proposed coal mine at Osmington in the Margaret River region because of the threat posed by such mining to the Margaret River, surrounding groundwater aquifers, the neighbouring agricultural and tourist operations and to the brand name of Margaret River which supports world renowned wine and tourism industries. The petition covers not only the proposed mine in Osmington but requests legislative change to protect pre-existing agricultural and environmental values in the whole Southwest region.

In more detail, we oppose the coal mine in Margaret River on the following grounds, believing that the threat to our water supply alone is sufficient to stop mining development in this region:

1. Threat to water supplies

a. LDO, despite their claim to be using the latest technology, have not adequately responded to Peter Lane's hydrogeological analysis of the very high risk to the Leederville aquifer (LA). The proposed mine is on the Vasse Shelf. Here the coal measures (CMs) lie uncomfortably beneath the LA which provides critical support to groundwater dependent ecosystems, farm bores, dams and the Margaret River (GDEs). The towns of Margaret River, Prevelly, Gnarabup and Cowaramup depend on water from the river and it is an important agricultural, aesthetic and recreational asset. Both aquifers and streams are already in stress.

It is proposed to mine beneath the river. Porosity of the CMs range up to 33.6%. Age dating, chemical pressure data analyses demonstrate the CMs to be hydraulically connected to the LA and thence to GDEs.

As the CMs dip to the west stratigraphic horizons progressively subcrop and are in direct contact with the aquifer. Further, hydraulic interconnectivity is greatly enhanced by widespread and unpredictable fracturing within the CM.

Influx of water into the mine would be significant and with observed fractures roof collapse resulting in catastrophic water influx can be anticipated. This would have a ruinous impact on GDEs.

The mining company claims to have "minimal impact" on water supplies but does not indicate how it can prevent the real risk of water loss.

b. Even though this mine is considered "low sulphur," coal seams always contain significant amounts of sulphur and sulphides which when oxygenated by mining create acidification of ground water which in turn leaches out toxic heavy metals. This toxic waste, once filtered out, can be placed in bunds, but this would be on the Leederville aquifer into which it would discharge. LDO say they plan to dump this toxic waste into the Margaret River at full flow in winter, but there are 20 low velocity pools and three weirs and the contaminated water would not reach the ocean (the river mouth is at the region's most popular and most visited beach)

c. The coal is to be washed at Capel using 1,000 litres of water for every one tonne of coal. Rio Tinto sold this lease to Vasse Coal and AMCI in early 2000s apparently because it could not be assured of adequate water supply for its needs. LDO has not revealed where it will get its water from, but it is suspected that the only possible source is the Yarragadee aquifer, already under heavy pressure from the metropolitan area. Disposal of water contaminated from washing faces the same hurdles as disposal of contaminated water from the mine site.

Water is necessary to all life, not just good living. The precautionary principle should be applied where there is any risk to the water supply of the South West.

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2. Endangered species - apart from the humans engaged in alternative land-uses on the "second tier" of our two tier economy, there are actual species at risk, namely the hairy marron, the Margaret River burrowing crayfish, the phascogale, the red tailed black cockatoo, and Carnaby and Baudin cockatoos, who will be further threatened by lower ground water levels, especially by the road cut through a P1 state forest to transport the coal to Bunbury port, and by increased noise, air and water pollution. LDO claims here too that the impact will be minimal but research shows that even "Boutique" underground coal mines create pollution which is detrimental to the health of humans, farm animals and wildlife. The AMR Shire Council has opposed the coal mine because it contradicts its policy on sustainability of the environment.

3. The impact on the Margaret River brand. The promise of additional employment by the coal mining does not consider the greater economic loss from those industries for whom the image of a coal mine destroys the pristine beauty of this area. International celebrities Michael Palin and Hugh Jackman have spoken out against the insanity of putting a coal mine in such a beautiful environment. The Southwest Edge of WA has only this week been recognised as a National Landscape, as being an environment of unique, pristine and highly diverse wilderness which should be treasured. Persistent reference to mining companies' legal rights under an anachronistic Mining Act prefigures the destruction of Margaret River's historical identity in the biggest land-use change in 100 years and forces an internationally recognised pristine region to stare down the barrel of resource destruction when it is already under pressure from climatic dehydration.

4. Asset values. Real estate agents in Margaret River note the decline in value of local properties, and the difficulty of selling properties. Local assets have devalued so much that there is no way a few jobs or local contracts like earthmoving/electrical etc can ever catch-up with those who will walk away from their devalued property. Farmers struggling to earn a living have found their assets frozen in the uncertainty of whether the coal mine will go ahead, unable to secure a mortgage.

5. The first of many. If this boutique coal mine is found to be environmentally acceptable to the EPA, the doors will open to the twenty or more mining leases currently held from Dunsborough to Augusta. At the moment 80% of NSW is covered by mining leases, with devastating effect on the value of remaining agricultural land and local businesses. There are adequate coal supplies for the next 300 years in areas in Western Australia, which will have less impact than mines in the Margaret River region. There is no NEED to mine for coal in Margaret River.

6. Traffic congestion To recover costs, the mines will need to have 40 tonne coal trains entering Bussell Highway, the major tourist route to the South West, every nine minutes 24 hours a day for the next twenty years. Currently Bunbury does not have the facilities to handle additional coal exports, and there is a risk of fire and contamination by coal of nearby woodchip exports.

7. Undemocratic process. There has been suppression in the media of scientific evidence that shows the potential damage to health and environment done by so-called "clean coal." There have been at least ten meetings between LDO and the Dept of State Development but little communication with the Margaret River community. Ross, from LDO, has said publicly that he pays no attention to the community opposition to the mine, despite the impressive public opposition to the coal mine reflected in the number of EPA submissions and attendance at rallies and petitions. There has been an attempt both by the Minister for Mines and LDO Mining to deflect criticism with personal attacks on those who raise legitimate questions as "activists", "alarmists", "greenies". However, people can vote against unpopular policies at elections, and it would be foolish to override the clear mandate (over 5000 signatures to the online petition at [www.margaretriversos.com](http://www.margaretriversos.com) in two weeks) and allow the coal mine to proceed on the basis of evidence supplied by the coal mine and government departments alone.

These reasons for opposing the coal mine in Margaret River are offered in much more detail in the 180 page submission made to the EPA. We would recommend politicians read and take it to heart. While the arguments rest mainly on social impact and environmental cost, we believe that even the economic benefits of the coal mine are outweighed by its long term economic cost to the region.

Yours sincerely,



Tarna Osborne  
Margaret River Climate Action Group,

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