## **Gabrielle Allan**

From:	sysadmin@interlated.com.au on behalf of Gardens of Stone <sysadmin@interlated.com.au></sysadmin@interlated.com.au>
Sent:	Wednesday, 11 October 2023 8:13 PM
То:	Gabrielle Allan
Cc:	jrobens@interlated.com.au; keith.muir6@bigpond.com
Subject:	Angus Place mod 8 and West Coal Services mod 5 submission

I have made a reportable political donation: No

I would like my name withheld: No

Jennifer Kent jenniferknt@gmail.com 75 Riverside Crescent Dulwich Hill, NSW. 2203

I am objecting to the proposal: Yes

To whom it may concern

As a keen bushwalker I have walked in the Gardens of Stone for over twenty years. It is a simply beautiful unspoilt area and its unique rock pagodas and vistas make it one of my favourite places to walk. I am very concerned that this proposal will significantly impact on the natural values of the area and further risk water contamination of Sydney's drinking water.

I think the timing of the submission period at the beginning of a long weekend and in school holidays impinges on the ability of the public to have the required 14 day minimum comment period.

The modifications should be withdrawn and be included under the Angus Place West mining area so that they can be appropriately assessed. There is significant risk of this proposal to the national heritage values of the Gardens of Stone which need to be considered within the context of the entire Angus Place West major project.

In 2018 approval of mine pumping, Angus Place Mine Modification 5, resulted in a dramatic drop of groundwater table and far-field loss of surface water in Newnes Plateau streams and swamps. It could be expected that the proposal will lead to similar impacts with the risk of damaging Kangaroo and Lambs Creeks and swamps as well as harming nationally endangered plants.

The proposal risks Sydney's Drinking Catchment through release of mine effluent with potential toxic contaminants such as Arsenic and Selenium into Wangcol Creek which flows into Cox's River.

The proposed discharges should not meet the "neutral or beneficial" test for water pollution because it adds to the overall pollution load in the creek. The transfer of 10ML/day of mine water from Angus Place to the Western Coal Services site for discharge should not be allowed. Adding mine water to a highly polluted element of the Wangcol Creek catchment is also likely to flush out more heavy metals from that contaminated part of the catchment downstream into the Coxs River, a key part of Sydney's water catchment that flows through the Greater Blue Mountains World Heritage Area.

These modification proposals to allow large discharges of mine water also defeat the purpose of the \$120 million Springvale Water Treatment Project (SSD-7592, approved in June 2017) that was built to eliminate mine water discharges from Springvale Mine and Angus Place Colliery.

The surface and groundwater impacts of the proposal have not been rigorously assessed and the proposal should be referred to Environment Minister Plibersek as the water trigger under the the Federal Environmental Protection and Biodiversity Act (EPBC Act) may apply. The release of 10 ML/day of mine water into the Cox's River that flows into the Greater Blue Mountains World Heritage Area must be considered.

Furthermore potential changes to the groundwater and surface water systems may impact on nationally endangered species such as Swamp Everlasting, Grevillea acanthifolia, Gentianella cunninghamii, Prasophyllum australe, Latham's Snipe and nationally endangered Temperate Highland Peat Swamps on Sandstone in the Angus

Place West Project Area. These impacts must be assessed.

Centennial has a history of licence non-compliance issues across its mine sites in the Gardens of Stone including serious breaches such as damage to million-year-old sandstone pagodas; coal fine pollution of Wollangambe River; and illegal discharge of toxic sludge into downstream wetlands. Centennial mining activities has had significant impact on Temperate Highland Peat Swamps on Sandstone and the likely loss of nationally endangered swamps on Newnes Plateau. This represents a very poor track record of its environmental obligations under NSW environmental law.

If the capacity of the 40ML/day Springvale Water Treatment Plant has been exceed and cannot treat an additional 10ML/day of mine water from Angus Place Mine as proposed in modification 8, then an additional water treatment plant is required. This is a large amount of additional mine water and the entire Angus Place and Springvale mine water matter requires thorough scrutiny by expert panels, including the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development, the NSW Independent Planning Commission and the Independent Expert Advisory Panel on Underground Mining.

Centennial Coal should withdraw modification 8 Angus Place and 5 Western Coal Services. Centennial Coal should at least seek to install a reverse osmosis treatment plant at Angus Place, as it did under modification 5, and then pump the brine effluent to Springvale Water Treatment Plant site for processing and appropriate disposal.

Any proposal for additional water treatment capacity at Angus Place Mine should be made as part of the major project for Angus Place West. Discharges from a reverse osmosis treatment plant at Angus Place should have a salinity of  $30\mu$ S/cm to have a neutral effect on the salinity of the Coxs River headwaters that would receive this discharge.