

## Gabrielle Allan

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**From:** sysadmin@interlated.com.au on behalf of Gardens of Stone <sysadmin@interlated.com.au>  
**Sent:** Tuesday, 10 October 2023 11:05 PM  
**To:** 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

Christine Oddie  
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I am objecting to the proposal:  
Yes

To Whom It May Concern,

I wish to state my objection to this proposal which should form part of the Angus Place West major project. This modification proposal should be subjected to scrutiny under Federal environment law and Centennial's track record means its environmental report on these proposals should not be relied upon without further investigation.

The 14 day minimum time permitted under planning law for review and comment on modification proposals which started on a long weekend predicates questions that may be asked as to whether these modification proposals should not properly assessed

These modifications should be part of the Angus Place West proposal because they are not minor changes - these modifications could damage nationally endangered swamps and plants and drain water from streams in the new Garden of Stone State Conservation Area. These modification proposals also intend to by-pass the \$120 million reverse osmosis mine water treatment plant and recommence the discharge of mine water into the Coxs River catchment. Again, Federal environment laws should be called upon in this assessment. Therefore, the modifications should be withdrawn and the proposed changes should be included in Centennial's state significant development application for the Angus Place West mining area so that they can be properly assessed and, I repeat, evoke Federal environment laws.

Yes, absolutely. These swamps and wetlands which are vital to the environment have been glossed over in Centennial reports over the years and these natural phenomena have existed for at least 12,000 years AND THEY ARE VITAL to the local environment. Too often in reports consultants say they have investigated these areas and found nothing of consequence - this is not true - and I have personally experienced that consultants hired by Centennial have glossed over vital environmental aspects of these proposals. The proposed modification 8, for example, which would allow pumping at 10ML/day from areas 800 and 900 is likely to again lower the groundwater table and also impact on surface water resources of the area of operations for the Angus Place West proposal. I do believe that the mine effluent will have elevated levels of heavy metals if salinity is treated to the proposed standard. This level of treatment may not adequately protect aquatic ecosystems, especially macroinvertebrates, given the flow of mine water at the LDP001 entry point into Wangcol Creek. This creek flows to the Coxs River and is part of Sydney's drinking water catchment. The modifications will see more contaminated mine water going into the Wangcol Creek from the Western Coal Services site. This water is likely to be contaminated with toxic chemicals such as arsenic and selenium that have been recorded as present in the mine water of the Springvale-Angus Place mine water system.

Yes, absolutely and for the following reasons - with a new Federal Government, these matters should be raised under Federal law.

We are concerned the modifications have not been referred for Commonwealth assessment under the EPBC Act. We think that this project is likely to have significant impacts on water and that the modifications should be referred

to Environment Minister Plibersek to determine if the water trigger applies. Commonwealth assessment and the application of the water trigger is important to ensure that there is rigorous assessment of the surface and groundwater impacts of the modifications.

Centennial Coal has failed to demonstrate that Modification 8 Angus Place and Modification 5 Western Coal Services do not impact matters of national environmental significance. The modifications should be controlled actions under the Federal Environmental Protection and Biodiversity Act (EPBC Act) for the following reasons:

- As “large coal mining” developments that will have, or are likely to have, “a significant impact on a water resource” the proposed modifications should be controlled actions under s 24D of the EPBC Act (known as the “water trigger”).
  - These modifications will cause 10ML/day of mine water to be discharged into the Coxs River that flows downstream into the Greater Blue Mountains World Heritage Area. Any downstream impacts of mine water arising from the proposed modifications on World Heritage values of the World Heritage property must be considered.
  - Due to groundwater drawdown associated with the Angus Place modification 8 mine water pumping proposal, depressurisation between surface and the near-surface groundwater aquifers is possible, and could alter the existing groundwater and surface water regime. These modifications may also have a direct or indirect changes in the water resources of the Sydney Water catchment that must be considered. Far-field impacts on streams and swamps in the Angus Place West project area are possible and should be assessed.
  - Due to a probable lowering near-surface groundwater aquifers, Angus Place modification 8 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.
- The modifications are likely to impact on water resources of a drinking water catchment, a World Heritage Area and nationally endangered plants and communities. Modification 8 Angus Place and Modification 5 Western Coal Services should be controlled actions under the EPBC Act.
- No, not without further investigation and probity.

Centennial has failed to demonstrate that it can operate responsibly in the Gardens of Stone region without causing irreversible damage to the environment. Records of environmental incidents and harm, consent and licence non-compliances and inaccurate predictions of environmental impacts from its operations suggest that current impact predictions in the environmental assessment should not be relied upon.

An audit of Centennial's mining licences for the past five years has found at least 134 licence non-compliances across its sites in the Gardens of Stone region. Centennial's non-compliance events in the region include:

- In 2022, Centennial breached its development consent for Airly mine causing major irreversible fractures to million-year-old sandstone pagoda formations in the Mugii Murum-ban State Conservation Area. The Department of Planning and Environment imposed a \$150,000 enforceable undertaking on Centennial. The company has since mined outside its approved area at Airly Mine, a Class 1 reportable offence under NSW Environmental Planning and Assessment Act.
- In 2017, the EPA prosecuted Centennial after its coal waste storage at Clarence mine spilt 2330 tonnes of coal fines into the Wollangambe River and caused damage within the Blue Mountains World Heritage Area, and Centennial was fined over \$1 million and clean-up operations took 12 months.
- In 2015, Centennial was fined \$15,000 when toxic coal sludge was illegally discharged from Springvale mine sediment storage ponds into downstream wetlands.
- In 2011, Centennial acknowledged that the Federal Environment Minister considered its mining activities had had a significant impact on Temperate Highland Peat Swamps on Sandstone, namely Narrow Swamp, East Wolgan Swamp and Junction Swamp and entered a \$1.45 million enforceable undertaking with the Commonwealth under s 486DA of the EPBC Act. These swamps have not recovered and are expected to be permanently lost. The company

has since paid \$28 million that only partly offsets some of the significant damage it has caused to nationally endangered swamps on Newnes Plateau.

Yes, and elsewhere in this submission, I have answered yes.

If the capacity of the 40ML/day Springvale Water Treatment Plant has been exceeded 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 30µS/cm to have a neutral effect on the salinity of the Cocks River headwaters that would receive this discharge.

My concerns are important as in the past, I feel objections have been washed over and final submissions made by a panel appear to only accept the applicant's side of the story. We are people on the ground and we see, that is me and other concerned citizens of this area, physical effects of this company's whitewashing of the whole story. I sincerely and humbly ask that at least this proposed modification be taken to the Federal level for assessment. Truly, if the company has really done its homework and has the best interest of people, environment, profit at heart, then it has nothing to fear from further investigation. For too long, such companies have not been held to account. Mining will continue in various forms, but laws need to be enacted to hold companies to account for their effects on environment, communities and accountability under the law.

