

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

[REDACTED]

Content: My family lives in the Capertee valley in Glen Davis .This is a very special unique place .We have a special ecosystem .This is the second biggest enclosed canyon in the world. This a a fragile drought prone valley with 80 threatened species. Capertee valley shoud be fully protected from any kind of mining . I object to any mining activity in the Capertee valley .We are very lucky to have this unique place .We should not allow the mining company to destroy it !! I recommend to put Capertee valley on the world heritage list .!!!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [Colin Phillips](#)
To: [Thomas Watt](#)
Subject: FW: Submission Details for [REDACTED] (object)
Date: Monday, 27 October 2014 3:40:56 PM
Attachments: [Airly Genowlan Extention.pdf](#)

Colin Phillips
Team Leader Mining Projects
Department of Planning and Environment
P: 92286483 colin.phillips@planning.nsw.gov.au

From: [REDACTED]
Sent: Monday, 27 October 2014 3:15 PM
To: Colin Phillips
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

GLEN ALICE, NSW
2849

Content:
Please accept our PDF submission

[REDACTED]

GLEN ALICE NSW 2849

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Airly Mine Extension Project

Application No SSD 5581

Development Assessment Systems & Approvals
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

27th October, 2014

[REDACTED]

[REDACTED]

[REDACTED]

GLEN ALICE NSW 2849

INTRODUCTION:

My Name is [REDACTED], my family and I have made our home in the Capertee Valley for the last 14 years, and have lived and worked here since. Our properties Watervale and Emu Swamp consisting of 4,000 acres is run as a stud and commercial cattle operation, we supply the stud and commercial market and run approximately 520 stud cattle. We sell our cattle at venues state wide, we also show our cattle at National, Stud and Royal shows.



Our property adjoins the proposed Airly mine extension into Genowlan Mountain along the entire northwest boundary of the proposed project. Hence we write to you in anticipation, that our submission is not only read, but that you understand and hear what we are saying, and that you might gain an understanding as to the immense ramifications this extension into Genowlan Mountain will have on not only our lives, our state of mind but our business, livelihood and property values.

OUR BUSINESS OUR HOME OUR FUTURE:

The viability of our enterprise depends on the water supply from Genowlan and Emu Creek, we pump and supply water to 39 troughs throughout the property, these two creek systems are the main source of water for our stock. [REDACTED] have Capertee River frontage, as well as 2 licenced irrigation bores and one licenced stock and domestic bore entitlements, two of which are on Genowlan Creek. Our properties are the first full time working property along Genowlan and Emu Creeks from the proposed mine site.

Environment:

Our family have on many occasions had the opportunity to visit and appreciate the awe inspiring rock pagodas, grotto and amazing tree ferns on the top of Genowlan Mountain, I can only hope that the people delegated with the responsibility of “approving and destroying” or “not approving and preserving” this pristine narrow, fragile Genowlan Mountain with its abundance of flora, fauna and Pagodas for future generations of AUSTRALIAN’S, listen to what the people who submit submissions, listen to the environment because the environment is at risk in this case and could be destroyed forever.

This valley is diverse with unique birdlife, our properties [REDACTED] is home to over 55 observed and 176 known species of birds including the Regent Honey Eater, over 18 observed species of mammals, including the Little Forest bat, Chocolate Wattled Bat, the listed as vulnerable Large Bent Wing bat which is a highly mobile species that forages over many habitats and found on [REDACTED], with the preferred roosting habit of this species is in the caves and crevices, such as the nearby adjoining escarpment of Mt Genowlan with its crevices and overhangs. Not to forget the copious amounts of frogs and reptiles.

PLEASE, visit this area with people independent of the overseas mining conglomerate, visit it with Australians who want the rim of the widest enclosed canyon in the world (that has over 10% of this countries biodiversity) to remain intact and preserved for our children and their children, most of all please visit it before you make a decision!! PLEASE NOTE: Genowlan Mountain will be subjected to subsidence, as a direct neighbour we have seen subsidence on many occasions without mining interference, regardless of what the mine experts say that mountain is too fragile and narrow not to subside.

If the mine is successful, these areas that are proposed for mining will take many 100's of years to regenerate, and in reality the pagodas will never recover, it will be lost to generations of Australians, yes Australians! How will you, as a decision maker, explain to your children and my children and grandchildren why and how you made a decision to destroy what they as proud AUSTRALIANS are entitled to enjoy, embrace, and showcase to the rest of the world. Do you say that a foreign company needed to destroy unique Australian landscapes so they could make a profit? Because that's the crux of the matter.

Should our lands future come at the cost of short term overseas investment and short term job gain?

We ask those simple questions of you and as concerned Australians with a lot at stake we need and expect a response in our favour, my children and grandchildren need and expect a response in their favour!

The people whose jobs are at stake today is small in comparison to the unemployment that will happen when these mines pack up shop and go home leaving us with destroyed rivers, creeks streams and aquifers, farms, and lives and livelihoods of Australian farmers. Retrain these people now, find renewable sources of energy now, and don't wait for a foreign company to destroy our land for their profit until you, our government act. Don't leave a legacy for our children that you will be ashamed of.



Water:

It is imperative to the existence of the agricultural industry, that within the widest enclosed canyon in the world the “Capertee Valley” its Australian farmers, who have paid our government for rightfully acquired licences are able to access the amount of water required to continue operation, and livelihoods which has been the case for over a hundred years. As I stated in my introduction we have 2 licenced irrigation bores (located on the adjoining property to the proposed Genowlan Mt extension) and stock and a domestic bore, interference to any of these water supplies, would **make our property worthless**.

We pump and then gravity water through a piping system over 6klm from our bores. Dams are very porous in the valley and don’t hold water well, and because we are a very dry climate we rely on our bores for stock water especially in dry times, the like we are experiencing now. I could not continue operating if this supply as stated by the mine was going to be reduced by 3% unless another source of acceptable quality of water was secured and supplied by the mine. Each of our cows can drink up to 70 litres of water a day! multiply that by 520 head 365 days a year.

The EIS has stated flows from the springs are likely to cease if the mine stop the springs on the Genowlan and Airly Mt areas, these springs feed Gap and Genowlan Creeks that flow into the Capertee River. The Community also had to apply under the Freedom of Information ombudsman to gain information on the original bores drilled by the mine, these showed high levels of heavy metals and poisons that should not be pumped from the mine. We want this information to be readily available to all concerned.

ECONOMIC ISSUES:

As I am now [REDACTED], always been self-employed and now nearing retirement, I have treated and planned that my 4,000 acre farm is my superannuation and retirement fund. I have been endeavouring to sell the farm as a “going concern” which is proving impossible, as soon as prospective buyers find out about the mine they refuse to go any further with negotiations because of the fact there would be a mine on their boundary and that the water is not assured for a future cattle operation. We as property owners are stagnating until we know whether to invest more into our property or not. To place revenue from a determined unviable coal mine that has already closed down once in 2012 is not worth the significant social and economic risks to the people of and environment within a potential world heritage area known as the Capertee Valley.

AGRICULTURE:

Within the walls of the Capertee Valley, agriculture is alive and well, regardless of what the mine say, I contribute to the 6,000 head of cattle that are bred and leave this valley and sold to domestic markets. There is, thriving sheep, alpaca, Thoroughbred horses, fodder, and goat industries with in the valley all relying from the water from these creeks, springs, and river systems. These systems are the life blood of these industries and they will not survive without WATER clean fresh WATER. In the present application there is NO GUARANTEE, is given to the neighbouring properties that our water supply for stock and domestic purposes, will not be affected. **We need a guarantee from the mine in the present application that all our water supply will be guaranteed for adjoining properties to the proposed Genowlan Mountain extension of Airly Coal Mine, as was in the original DA of the mine. If the mine say we will not be affected why not guarantee our water.**



TOURISM:

Tourism is a thriving business within the valley with people travelling from all over the world to come and see the birds, rock pagodas, escarpments, unique plant life and abundance of mammals. B&B accommodation is found throughout the valley, helicopter flights are available. At even given day you will find bird watchers dotted all over the valley.

MONITORING AT THE MINE:

On paying to receiving the mines bore report through the freedom of information ombudsman (the mine refused to give us the information on the bores) the mines Hydrologist, stated that the water should not be pumped from the mine bores as it contains heavy metals and poisons. Airly mine has admitted several spills from its large dams and the sampling and monitoring to water does not comply with the due diligence procedures, hence the need for independent of the mine monitoring of these and other important water issues.

CONCLUSIONS:

1. We are not against the mine. But we need honesty and we need our life and land protected.
2. I want my water 100% guaranteed by the mine.
3. The Grotto including its springs and water supplies be fully protected
4. Airly Village ruins be fully protected
5. I am entitled not to have my property devalued because a mine starts up next door.
6. I value the pristine area they are proposing to mine.
7. The proposed mining area of Genowlan Mt should be left in the pristine condition it has been in for hundreds of years. This mountain should be fully protected.
8. We do not want increased road traffic and want the mine to be responsible for upgrading of the road if any increase in flow happens.
9. The entrance to the Capertee Valley has been destroyed visually by mounds of coal. This must be completely screened off.
10. No increase of noise, this valley is quiet and serene and should stay that way.
11. No pollution should be tolerated from the over flow of dams on the mine site.
12. The mine need to be better neighbours as promised to us by Mr Chanin Vongkuslkit the CEO of Banpu. Centennial Coal representatives need to take up that promise and be truthful, honest and share information with their adjoining neighbours. There should be no need for the community to go to "freedom of information" and pay to find out the truth, especially in matters that effect their lives and businesses.
13. **Residents of the Capertee Valley need an "absolute guarantee" that there will be NO EASTERN PORTAL. Centennial Coal have told the community lies in the past "EXAMPLE: Mine managers attended a community meeting and told the community under no circumstances will a washery ever be built" so we need an absolute guarantee there will be no Eastern Portal.**

Thank you for reading my submission of concerns on the Airly Extension into Genowlan Mt.
Thank you for taking the time to read my submission.

██████████

30 October 2014

Colin Phillips and Thomas Watt
Department of Planning and Environment

Dear Mr Phillips and Mr Watt,

**Re: Application SSD12_5581 Airly Mine Extension Project
Objection to proposed development**

Our property is on the Capertee River in the Capertee Valley. We are downstream from the proposed extension of the Airly Mine by Centennial Coal.

We are deeply concerned about the impact of the proposed development on the ground water and surface water volumes, quality and flows. We absolutely rely on these for the ongoing viability of our farming and grazing enterprise.

The proposed extension of the Airly Mine covers a massive area (Authorisation 232) possibly corresponding to the "Project Application Area" in Fig 1-3 in GHD Report for Environmental Impact Statement-Groundwater Impact Assessment 22/16787. It is unclear from this diagram whether underground works are proposed to extend beyond the coloured area to the red border shown. The proposed duration of the project is 25 years.

It would be easily foreseeable that such a massive operation covering over 3000 hectares and lasting a quarter of a century is likely to lead to certain adverse events.

Foreseeably, if the project were to go ahead, there would be a degradation in the quality and flow of both surface and groundwater in the Capertee Valley and on our property. The events leading to this degradation would occur possibly intermittently but the overall effect would be to deprive the Capertee Valley of good quality water for a generation and beyond.

Foreseeably, there will be times of high environmental temperature, high surface evaporation, and reduced precipitation. This would create a situation where, if the Airly Mine Expansion were to go ahead, a natural environmental event would be significantly compounded by a man-made disaster, further reducing water flows and volumes, and likely increasing the concentration of any contaminants in what water there was available.

Foreseeably, this will result in loss of productivity and potentially a loss of viability of all the farming and grazing enterprises downstream and within the groundwater sources of the mine.

We request that the Department of Planning and Environment consider enforcing a condition on the proposed extended Airly Mine that the mine be put into a "care and maintenance" phase in a timely fashion during periods of

drought and El Ninio events and during the recovery period that follows. Water not used during “care and maintenance” phase would flow downstream from their facility and reenter the aquifer . The aim would be to maintain the viability of the enterprises in the area.

We request that any loss of flows or quality be assessed independently and publicly and that any loss of production consequent on loss of flows or quality be compensated financially by Centennial Coal directly to the landowners so as to maintain the viability of their enterprises and to keep them on their land.

Many thanks for your consideration.
Kind regards

From: [Colin Phillips](#)
To: [Thomas Watt](#)
Subject: FW: Submission Details for [REDACTED] (object)
Date: Friday, 31 October 2014 10:23:38 AM
Attachments: [141030.AirlyExtnEISsubmission.JL.pdf](#)

[REDACTED]

Sent: Thursday, 30 October 2014 23:43

To: Colin Phillips

Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

Clandulla, NSW
2848

Content:

I wish to object to this mine extension and attached my submission below.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

OBJECTION TO PROJECT SSD 5581: AIRLY MINE EXTENSION

I operate a B&B just outside the Capertee Valley and always recommend to our guests that they include travel through the valley either to or from a visit to our place. I have worked in tourism for some forty years, both around all of Australia as well as many overseas countries (over 60). The Capertee Valley can hold its own with any of the world's renowned scenic places and its tourism potential is only just starting to be realised. Its scenic and biodiversity value must be protected at all costs for now and future generations and not be compromised for a twenty year project to mine poor quality coal. (We understand to date the quality of coal production at Airly has been poor.)

The EIS has a number of shortcomings: It does not properly address the tourism and agriculture industries in the valley; it is not transparent about the actual percentage of coal extraction; the impacts on water are not fully accounted for; the heritage values, both human and geophysical are not properly recognised; there are inadequacies in the botanical survey.

Tourism: The EIS does not recognise that the Capertee Valley already has a significant tourism industry with over 17 tourism operations in the valley ranging from bed & breakfasts, holiday houses, wedding and events venue/ wellness retreat to a festival with 3500 visitors. It is one of the top birdwatching areas in the world. This is an industry which is sustainable well into the future (unlike the mine) and has the potential to grow significantly as it is only just now getting to be known. The Capertee Valley is a unique part of Australia with outstanding scenic and ecological qualities, right on Sydney's doorstep and thus highly accessible to both national and international tourists.

Heritage Significance: The EIS is totally inadequate in its evaluation of the heritage significance of the mine area regarding both the cultural and biophysical heritage. The pagoda rock formations and slot canyon areas are of great value. The site is immediately north of the World Heritage Area. We understand The Greater Blue Mountains World Heritage Advisory Committee has indicated that it would seek at a future time to **add** the Mugii Murum-ban SCA to the Greater Blue Mountains World Heritage Area once mining has completed - assuming its outstanding natural heritage values have not been damaged. This area is of national significance. Accordingly the **precautionary principle should be applied** to ensure the protection of the area and to minimise possible disturbance to the State Conservation Area.

The EIS inference that the heritage of the oil shale ruins is only of local significance is downright wrong! They are already on the state heritage list so clearly the claim they are of only local significance is nonsense. Furthermore they were listed on the National Trust in July 2014. It is concerning that this sort of error is made in the EIS.

The Airly Village ruins and the Grotto should be fully protected.

Water: this is of major concern. We are aware that the hydrology expert Dr Pells has stated *"It should be understood that even in areas of first workings, where there is small subsidence and there are small surface strains, there will be impacts on groundwater systems and base flows to streams"*. Any reduction in flows to the creeks will impact all the industries in the valley.

The EIS is quite dismissive of the impact that mining will have on the permanent water supplies on the mesas. It suggests that all creeks are ephemeral. While this is mostly true, the Grotto is known to always have water in the pool below the slot canyon. There are also seeps and springs on other parts of the mesas. The EIS states on p.42 that there is a 'lack of water' on Genowlan Point, but bushwalkers know there are in fact seeps and drips available to use (as I have on a memorable visit to the area), just as Aboriginal people would have used them.

The proposed washery and the extra 100 meg water licence that Centennial was somehow granted (from a different catchment and despite Office of Water cutting back their original application by 100 megs) causes great concern as we do not believe the full amount of the licence can be sustainably drawn from the ground water resource.

There is also concern of polluted mine water (salt, sulphur, iron and other heavy metals that are a by-product of coal mining) escaping and contaminating the waterways. This is a real concern as already this year there have been two instances of the sediment dams overflowing. We understand Airly Mine's current EPL does not cover common mine pollutants such as sulphur, iron and other heavy metals. This must be rectified.

We also understand there are serious flaws and shortcomings in the hydrological data presented in the EIS, as detailed in a number of consultants reports on the EIS.

Agriculture: The EIS does not give full value to the important agricultural industries in the Capertee Valley. There are several large scale farms- up to 11,000 acres in size and over 6,000 head of cattle are produced each year. In addition there are goats, sheep, alpacas, pigs, bees, poultry. Crops include lucerne hay, olives, saffron, fruit and vegetables, native plants. All of this depends on water which could be severely compromised by both the mine's extraction of water for the washery, and through even minor subsidence.

Subsidence- This is affected by extraction techniques and percentage of coal allowed to be extracted under different geological formations. However the EIS is not at all specific about this. It is difficult to work out what the percentage extraction will be under the different zones (ie cliff edges, talus slopes, the mesas that contain the slot canyons and pagodas).

The Extraction Plan should be made available for public scrutiny. Centennial must be required to uphold its commitment to take only half (50%) of the coal under the whole of the State Conservation Area to protect biodiversity and avoid pagoda and cliff collapses, and this percentage must be reduced under the more sensitive areas.

Slot canyon misrepresentation. P.39 of the EIS states that narrow deeply incised gorges are quite common throughout the Blue mountains. This is true of gorges but quite untrue of slot canyons such as the Grotto and Valley of the Kings. Slot canyons are mainly limited to the north-west edge of Wollemi NP and Gardens of Stone. The extent of slot canyons in this area is arguably of international significance (Wray and Washington, in publication). The Grotto is thus not just another boring old gorge, it is a slot canyon, a significant landform on the national and international level.

Rejects Stockpile: The EIS is vague about exactly these will be treated, merely giving three examples of how they can be treated. This is totally inadequate. The stockpiles need to be totally covered to eradicate dust causing contamination of waterways and the pristine air quality of the valley.

From: [Colin Phillips](#)
To: [Thomas Watt](#)
Subject: FW: Submission Details for [REDACTED] (object)
Date: Friday, 31 October 2014 3:28:49 PM

From: [REDACTED]
Sent: Friday, 31 October 2014 15:25
To: Colin Phillips
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

Dargan, NSW
2786

Content:

I object to this Extension project because it is undermining the area of Airly Genowlan which should be declared World Heritage

due to its unique biodiversity and pagoda landscapes.

Also the original mine proposal was never to go under Mount Genowlan. Centennial has hardly begun to mine under Airly Mtn and now they are greedily trying to get approval for this massive extension.

Damage to this unique landscape is not worth the short term gain to an overseas Company who has shown recently that it is not a good corporate citizen.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [Colin Phillips](#)
To: [Thomas Watt](#)
Subject: FW: Submission Details for [REDACTED] (object)
Date: Friday, 31 October 2014 11:14:20 AM

From: [REDACTED]
Sent: Friday, 31 October 2014 10:57
To: Colin Phillips
Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

Glen Alice, NSW
2849

Content:

To Whom it May Concern

My husband and I have grave concerns regarding Airlie Mine. We are small farmers who've been in the valley for over 4 years now, living here full time. We derive our income from cattle.

As you should know the rainfall in the valley is not that great, we personally are in a rainshadow, so receive probably a little less than average in the valley. We are reliant on underground water to feed our stock, so reliable clean water is a necessity for us. We have a creek running through our land, but there's almost no water in it and it certainly isn't "running". Added to that we can't use it for stock water.

Our concerns are the mines contaminating our water supply making it unusable. They keep trying to convince us that won't happen, but I'm afraid I'm a little too old and cynical, and been around a little too long to believe these companies whose main concern is their bottom line.

We have chosen to live out of the city in what we believe to be a most beautiful part of Australia. We'd like to keep it that way if possible and I see no reason not to. This area is a tourist destination for many "birders" who come in from all over the world to find and watch our magnificent array of birds. If the birds leave so do the tourists who come here. Can Lithgow afford to lose the money these foreigners bring into the community?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [Colin Phillips](#)
To: [Thomas Watt](#)
Subject: FW: Submission Details for [REDACTED] (object)
Date: Friday, 31 October 2014 10:42:38 AM
Attachments: [AIRLY EXTENSION 2014.pdf](#)

[REDACTED]

Sent: Friday, 31 October 2014 10:31

To: Colin Phillips

Subject: Submission Details for [REDACTED] (object)

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation: no

[REDACTED]

[REDACTED]

Dargan, NSW
2786

Content:
See file attached.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Submission on the

AIRLY MINE EXTENSION PROJECT SSD 12_5581

In The Justification and Conclusion of the EIS for the Airly Extension it states that:

“The technical studies have concluded that no significant alteration to the supporting physical or hydrological environments is likely to occur as a result of the Project”

I feel that such a generalised statement is meaningless, as how much environmental damage is “significant” is debatable. The only proper protection for an area is to guarantee “no damage”.

“Minimal” or “Minor” damage is not acceptable to me, especially in a State Conservation Area which includes areas of nationally significant geodiversity and Endangered Ecological Communities.

As the only true way to protect an area is not to mine under it, I would not like to see the Airly mining area extended easterly beyond its current lease boundary into the rest of the A232 authorisation area.

That is the only way to conserve what is essentially a wilderness area on the Genowlan Mountain mesa.

No mining would avoid the disturbance effects of mine exploration, various forms of monitoring, and mining subsidence effects on the geology, hydrology, and the ecosystem.

Mining also affects the visual and noise amenity of areas. It would spoil the ambience of the area for bushwalkers and other recreational users.

Increased industrial activity results in a greater bushfire risk also, which would be a risk for other users of the National Parks estate.

Centennial Coal wants to mine under virtually all of the Airly-Genowlan mesa area, but since their development was approved about 20 years ago they have only mined a relatively small area on the western side of Airly Mountain. Limiting their mining area to the current mining lease would still allow a very large area for mining, much larger than they have managed to mine so far.

The company says that they plan to use mining methods that would vary across the entire area according to the depth of cover and the sensitive nature of the surface features, such as cliffs, pagodas or heritage sites.

The various methods would result in varying amounts of subsidence at the surface, or as they say “to engineer the desired subsidence levels”.

In areas of cliffs and pagodas they plan to use first workings mining (but only 30m either side of the cliff), but even that will result in 5% of mining related impacts to the majority of cliffs, and in some cases 10%.

This may be considered “insignificant” by the ACARP methodology, but those standards need to be tightened in this day and age. Even Centennial Coal admit that the 1.8m subsidence (and potential damage) approved in the existing development consent is not acceptable by society today.

As such, I think there should be no mining under cliffs/pagodas or other significant surface features such as The Grotto, which are of national geodiversity significance.

The company acknowledges that subsidence *will* occur, it is just a matter of how much. Subsidence will have a detrimental effect on the hydrology (including near surface and deeper aquifers), which in turn can affect the associated ecosystem.

There is an EEC near Genowlan Point, and this should not be mined under unless they can guarantee no adverse impacts.

Increased size of mining areas also leads to issues with surface water runoff and mine water make, and damage to aquifers. The company states that the Permian aquifer just above the Lithgow Seam will be damaged, leading to flooding of parts of the mine.

Cracking and subsidence ground effects can have the opposite result of reducing the water available in the

ecosystem, leading to dieback of vegetation, and subsequent erosion in sensitive soil profile areas.

The plan to mine under the existing (largely unknown) New Hartley workings and the unique heritage areas of Airly village (including “Cave Houses”) is not a good idea, as the area is already quite damaged by the historical mining, and mining the vertically close by Lithgow Seam could have unforeseen results.

In conclusion, I feel that the important geodiversity and biodiversity of the Mugii Murum-ban SCA should be protected as much as possible from mining damage (*which the company admits will occur*), and a large part of this preservation can be achieved by not approving the mine extension over the whole of the Airly-Genowlan mesa, and limiting any further mining to the current lease boundary, and not in the bulk of Genowlan Mountain, which includes Genowlan Point which has an endangered ecological community and magnificent cliffs and pagodas. Any mining there would ruin the remote wilderness feel of the area.

This mine design, in any approved extension area, should be made even more conservative (eg. panel and pillar widths) to minimise the subsidence effects on surface features and aquifers.

Some of the profit from the sale of coal should be foregone to get an even better environmental outcome, with negligible damage to the area rather than the greater “no significant” damage.