

Main Project- DA504-00 Application Number- DA504-00-Mod-11

Dear Independent Planning Commission

Coal mine proposals in the Gardens of Stone State Conservation Area are legend and complex.

Key proposals seek approvals to reintroduce disposal of huge volumes of mine waste into Sydney's main drinking water supply, coupled with many changes to coal mining plans through a consent modification process (called MOD for short).

I strongly support conservationists who are calling for a ***moratorium to enable development of a long-term strategic plan that stops the discharge of mine -waste pollution into Sydney's drinking water.***

The history of Centennial Coal, who operates Clarence Colliery, has faced regulatory scrutiny for discharging pollutants into local waterways in the past. While they work on their ESG strategy (environmental, social and governance practices) there are ongoing concerns regarding its environmental practices and regulatory compliance. Any MOD changes and requests that they make must be considered cautiously due to their past failures.

Clarence DA 504 mining Mod 11 seeks a 5 -year mining consent extension to 31 December 2031 and wants to use coal wash from this mine to cap a toxic fly ash mess from Wallerawang Power Plant at Sawyers Swamp Creek. Clarence DA 504 has had multiply modifications, proposals, and changes.

The Clarence Mine Extension Mod 8 of DA 504 was due for EPBC referral exhibition last year. Centennial Coal has tried to take short cuts in their modifications in the past, trying to get a proposal approved under the existing consent and EIS even though it covered 400ha mine proposal area. They have always had issues with mine waste. Farmers Creek dam is to be decommissioned. The drained and decommissioned storage dam will reveal a sediment filled wasteland and there were no plans by Centennial Coal to restore this mess in their applications.

A new development application for Clarence Colliery integrating multiple approvals will seek permission for another 25 years of coal mining, to 2053 that required EPBC referral in 2025, and the Environmental Impact Statement in 2027.

The proposed MOD 11 extension of the Clarence Colliery, near the Gardens of Stone region in New South Wales (NSW), has raised several environmental, social, and cultural concerns. Below is a summary of the key negatives and potential impacts identified by conservation groups, environmental assessments, and community stakeholders.

A) Environmental Negatives

1. Damage to the Gardens of Stone ecosystem

- The Gardens of Stone is an environmentally sensitive area featuring rare pagoda rock formations, threatened species, and unique upland swamps.
- The MOD 11 proposal could lead to subsidence impacts (ground movement and cracking), causing irreversible damage to these sensitive geological and ecological features.

2. Threats to biodiversity

- The area provides habitat for several threatened flora and fauna, including species dependent on upland swamps and sandstone communities.

- Underground mining and associated activities risk altering surface hydrology, drying out swamps, and reducing biodiversity in key habitats, as wildlife need clean water to survive.

3. Water pollution and hydrological impacts

- The Clarence Colliery has a prior history of pollution incidents, including discharges into the Wollangambe River (which flows into the Blue Mountains World Heritage Area).
- The MOD 11 project could increase the risk of water contamination from sediments or coal wash, affecting both the Sydney drinking water catchment and nearby ecosystems.

B) Heritage and Landscape Concerns

4. Visual and cultural degradation

- The Gardens of Stone region is valued for its aesthetic, recreational, and cultural significance, including connections to Aboriginal heritage. This is being disturbed by coal mining.
- Mining-related activities may disturb culturally significant sites and alter the visual landscape, reducing its tourism and heritage appeal.

5. Conflict with protected and proposed conservation lands

- Conservation advocates have long proposed complete protection of the Gardens of Stone State Conservation Area, which overlaps parts of the MOD 11 project footprint. Ideally this should be a protected national park from destructive practices such as coal mining.
- Expanding mining operations is in direct **conflict** with long-term conservation and tourism goals for the region.

C) Social and Policy Issues

6. Undermining climate action efforts

- The MOD 11 proposal extends the life of a coal mine, counter to NSW and its national strategies for decarbonization and renewable energy transition.
- Continued coal extraction contributes to greenhouse gas emissions and delays regional economic diversification.

7. Community opposition and trust deficits

- Local and environmental groups have voiced strong opposition, citing lack of transparency and insufficient consultation.
- Approval could further erode community trust in environmental regulation and mining oversight in NSW.

I am very concerned about the environmental damage to upland swamps, biodiversity loss, water pollution. There will be significant harm to the landscape with harm to pagoda formations, cultural sites, and visual appeal of this conservation area. This proposal also represents social injustice as it contradicts climate policy, threatens the eco-tourism vision, and has strong community opposition and opposition from the wider community.

For these reasons I am opposed to this MOD 11 extension of the Clarence Colliery near the Gardens of Stone region.

If the extension is approved despite community opposition, it must come with these **five strict** conditions-

1. **Link approval to the upgrade of the Lidsdale coal unloader.** This critical infrastructure would reduce reliance on the polluting, wet Springvale mine. **Toxic pollution in Sydney's drinking water catchment surges far beyond approved limits** as released information in December 2025 testifies.

2. **Reject the continued approval of 300,000 tonnes of coal by truck.** There is **no** justification for extending years of heavy truck movements through the Blue Mountains and Sydney. Rail is available and should be mandatory.

3. **Acknowledge the real impacts of truck transport.** The claim of "no or negligible" impacts does not reflect the experience of communities dealing with noise, traffic, diesel pollution and road safety risks from over 7000 truck trips every year. Local communities are impacted NOW and will be further impacted with 5 more years of noise and air pollution and traffic congestion on roads that were NOT built to take this ongoing load of continual use from large coal trucks. These vague terms of 'negligible' are meaningless.

4. **Prioritise local use over export.** Most Clarence Colliery coal is exported. If extraction continues, it should supply Mount Piper Power Station to avoid pressure for new coal from more damaging mines in the region. We should not be supporting a coal mine in or near a conservation area that extracts coal to be exported to further the companies' financial gain. Any coal mine should be used to benefit domestic markets only.

Approval should ONLY be given contingent on supplying Mount Piper Power Station's needs. We do **not** want a situation of opening up another coalmine in the same area in the immediate future to service this power station. This is morally wrong.

5. **Strengthen rehabilitation requirements.** Existing rehab commitments are outdated and inadequate. Any extension must impose modern, enforceable rehabilitation standards.

I also advocate for two requests-

- I call for a moratorium and a strategy for mine waste water management that is long overdue.
- I strongly demand better outcomes for the Gardens of Stone and hold decision-makers to account, remembering that this is a conservation area and should be considered and valued for its environmental values NOT to service the monetary needs of a fossil fuel company.

Yours sincerely

Janice Haviland