

Liddell Coal Modification 8

Application No. DA305-11-01 Mod 8

Dear department of Planning

In relation to the proposed application, this an objection to the changes related to Liddell coal application on these grounds.

1. Production of additional access tracks – increase of dust and land disturbance
2. The extension of life of the coal operations consent (DA 305-11-01) to the year 2050, which would have impact on the rehabilitation plan due to the operation closure date as per the document is 2024. Would prevent the transition process of the upper hunter, to other industries and stop the re-use of the land as the consent would remain active.
3. The final void- the increase of tailings in the void from other areas, unable to determine the realistic impact on the surrounding landforms from leaching rates and what impact this would have on water quality beyond the void.
4. The final void- the concerns related to acid from tailings, there is great possibility due to climatic condition changes that this could be accelerated.
5. The final void- no mention in the document, that due to the issues related to pit lakes and water quality, that it is not classified a contaminated land and impacts of the whole site and beyond.
6. The final void – discussing salt balance related to 500 years, how can this be accurate with so many unknown factors, related to environment and climate changes. There lacks prevention related to controls and improvements of the water quality, for future use and only looks at benefit for the proponent not for the future generations and land use.
7. Pipeline used for transfer of tailings/water- from other locations, concerns with leak rate and detections, impacts on adjacent land and contamination.

8. Mount Owen modification Mod 7- SSD-5850 – refers to the Integra underground related to existing connection of water supply but the underground mine is now organizing closure plans and rehabilitation plan, it would be expected the pipeline would be removed to Mount Owen apart of the plan, there is no mention of extending the life under the consent to GWATS.
9. From all the proposals related to the GWATS- the cumulative impact related to movement of tailing from different sites to Liddell and what is the impact on the voids at these sites are they becoming larger, does this impact the rehabilitation of the land at these sites.
10. Ravensworth Coal operation Mod 4- MP09-0176- mod 4- referring to the GWATS, what is the impact from the voids holding ash slurry and seepage rate, to the disturbed land and mining operations, now should this site be classified as a contaminated site under the EPA register.
11. Each application state there is no contamination site in the area but looking at the register from the EPA website, Bayswater Power station is listed and therefore this site is classified as a land area in the vicinity of the Liddell and Ravensworth.

Therefore, contamination land has not been assessed related to final voids and associated land and what 500 years means in reality the whole of the upper hunter mining area would be classified. There seems to be a precedent that cumulative is just the operation and near neighbors rather the whole area impacts.

Also, the proponent references discussion paper on final voids done 2017, this is a departmental failure to actually initiate a final void policy with clear guidelines which would benefit industry and the public, so therefore this application should not be approved until the department and Minister take actual leadership and producing a policy.