



JR:CA:ECO800013

21 May 2019

Attention: Andrew Rode
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Andrew,

RE: MODIFICATION TO SSD 08_0211 CHARBON COAL

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the proposed modification to SSD 08_0211 for the Charbon Coal (Mod 1). Council has reviewed the proposed modification for SSD 08_0211 and provides the following feedback for your consideration.

Project Timeframe

The EIS indicates that up to 170ML of water per year will be transferred from Charbon Mine to Airly Mine as part of the proposed modification. The EIS does not state the total number of years in which the proposed water transfer is expected to occur.

The EIS states that the proposed modification is not proposed to increase the approved life of the Charbon Coal project. Whilst it is assumed that the water transfer is proposed to cover the full life of the Airly Mine project, it is not clear what happens at the end of the approved life of the Charbon Coal project, if this is less than the approved life of the Airly Mine project. It is unclear whether the proposed water transfer would continue to Airly Mine even if the rehabilitation and closure phase has been completed at Charbon Mine.

Downstream Water Users

The EIS recognises the potential impacts of the modification on downstream water users, including Windamere Dam. The potential impacts are described as negligible, given the small number of lots (ie. 3) and percentage of the total catchment of Windamere Dam.

In reality, any reduction in the volume of water downstream is likely to generate concern in the community, particularly given recent drought conditions. If the modification is approved, it is recommended that relevant mechanisms be put in place to closely monitor and inform downstream water users of the timing and volume of planned water transfers.

Given the potential for downstream users to not have access to their total water allocation in 10% of years, Council encourages Centennial Coal to work closely with users to minimise the impacts as much as possible during these periods.

Transfers between Catchments

It is noted that a number of stakeholders have raised questions regarding the transfer of water between separate catchments (ie. Macquarie-Bogan catchment and Hawkesbury-Nepean catchment) and this was an initial concern of Council. The EIS has addressed this issue and confirmed that none of the relevant legislation prohibits the water transfer.

Rehabilitation

Council understands that the proposed modification will not impact the planned rehabilitation activities for the Charbon Mine as a separate water source is available for rehabilitation purposes. A condition is recommended to ensure that rehabilitation activities take priority over water transfers should there be any change in available water sources at Charbon Mine.

If you have any questions in relation to our letter, please do not hesitate to contact Council on (02) 6378 2850.

Yours sincerely

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a long horizontal line extending to the right.

BRAD CAM
GENERAL MANAGER