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File: Letter to DoP Myuna Coal EA.doc

Matthew Riley
Major Development Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Your Ref: MP 10_0080
Our Ref: A378299

Dear Mr Riley

Subject: MP 10_0080 – Myuna Coal Project

Thank you for the opportunity to comment on the above proposal. The Hunter-Central Rivers Catchment Management Authority (CMA) has reviewed the information provided and offers the following comments for your consideration.

Hunter-Central Rivers Catchment Action Plan (CAP)

The Hunter-Central Rivers CAP is a whole-of government approach to natural resource management which has been endorsed by the NSW Government. The comments below are provided in the context of the impact of the project on the CAP, which is available on the CMA's website
<http://www.hcr.cma.nsw.gov.au>

The guiding principles within the CAP are statements that outline the CMA position on how natural resources should be managed in the Hunter-Central Rivers region. They provide direction for all natural resource managers to achieve ecologically sustainable development and allow organisations to align their activities so that they are compatible with the CAP. This will ensure that the whole community (including government) can work towards a common goal.

It is noted that the Environmental Assessment has not documented the CAP as a Regional Plan in section 7.4.

Benthic Communities

To prevent species, populations and ecological communities from becoming threatened or extinct, it is important to preserve high quality salt marsh, mangrove, estuarine, seagrass, marine and marine shoreline habitat that remains in the long-term.

The report states that “the bed of Lake Macquarie is relatively flat and in the deeper areas consists of fine, dark, soft silt. The diversity and abundance of species found in these benthic sediments during previous surveys by the Ecology Lab is typical of that expected in a temperate NSW estuary and included polychaete worms, crustaceans and molluscs. Localised subsidence of up to 650 millimetres predicted for Mining Zone B will likely result in localised alterations in species composition due to depth changes. Given the large area of similar habitat within Lake Macquarie for these species, localised changes to benthic soft sediment assemblages as a result of subsidence and increase in water depth will not be significant.”

The Environmental Assessment does not appear to provide the area or extent for Mine Zone B, but from the maps it appears to be at least 15 square kms. This is approximately 13% of the area of Lake Macquarie and an impact over this area could not be considered localised. Given that the benthic assemblages are unlikely to move the considerable distance to “similar habitat”, the CMA questions the above conclusion that impacts will not be significant.

The CMA supports the proposed development of an Extraction Plan prior to secondary workings under Mine Zone B to address impacts on benthic communities, but suggest this assessment should be done prior to any subsidence under Mine Zone B and that impacts are mitigated. It is suggested that impacts on benthic assemblages needs further investigation prior to mining.

Cumulative Impacts

The cumulative impacts section of the report does not consider sea level rise as an external impact in combination with the impacts of the mine. For instance, the assessment does not take into account rising sea levels which are predicted to rise 40cm by 2050 and 90cm by 2100 (on 1990 levels). Interpolating this trend would indicate approximately 28cm sea level rise (over 1990 levels) over the life of the mine.

The significant rise in sea level should be considered in terms of impact on aquatic ecology, possible increase in subsidence due to greater downward pressure and changes to foreshore geomorphology.

In summary, the CMA does not support the proposed Myuna Coal Project given the proposal does not improve or maintain environmental outcomes and in particular, due to the uncertainty regarding potential adverse environmental impacts over a significant portion of the bed of Lake Macquarie.

If you require any further information please do not hesitate to contact Anna Ferguson, the CMA's Regional Catchment Coordinator on 4337 1213.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G Lyons', with a stylized flourish at the end.

Glenn Lyons
Program Manager for
Fiona Marshall
General Manager

14 April 2011