

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.