

31st October 2014

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RE: SUBMISSION AIRLY MINE EXTENSION PROJECT
APPLICATION NUMBER SSD 12_5581
Centennial Airly P/L Mining

On the surface, the Airly Mine EIS reads as a very reasonable set of documents. However, on closer examination there are some flaws and omissions which need to be addressed. This is particularly important considering the World Heritage value of the Capertee Valley and the particular importance of the Mugii Murum-ban State Conservation Area containing the Airly/Genowlan Mountains and the fact that at termination of mining, if its values have not dropped, will be included in the world heritage area.

The term Grandfathering has been used without any mention of specific items to be grandfathered. I submit that there be no grandfathering because the original DA was dated in the 1993 and the conditions then were vastly different to current expectations of mining. The extent of this could even be that due to grandfathering Airly Mine is entitled to apply for 1.8 metres of subsidence which under current expectations is not acceptable.

Eastern Portal – in the early section of the EIS it was stated that Airly Coal would not be applying for the Eastern Portal but elsewhere in the EIS, there was the indications that the Eastern Portal was still an option. This should be spelt out instead of being hidden in the 2,000 odd pages of the EIS.

Issue of second workings which will extract up to 70% of solids and in some cases full extraction. The EIS states that plans for mining method are not developed therefore there can be no scrutiny of what is happening underground to ensure minimum subsidence. Plans should be developed fully before the EIS is approved. Also it appears that Airly Coal has abandoned the commitment to only mine 50% of the coal to avoid subsidence.

With regard to subsidence, it is a case of 'we must trust the engineering to protect water and subsidence'. Unfortunately mining companies do not have a good track record in this. The argument for the preliminary engineering figures are based on experience at Clarence Colliery over 50 kilometres away where subsidence of 20 – 30mm is the design figure. Reduce the percentage of extraction to 50 % as already agreed and ensure that there will be no environmental damage at the Airly Mine.

I observe that maximum subsidence has jumped from 100 mm plus or minus 25 mm to a figure of 125 mm, a sneaky way of gaining 25mm. 125mm just happens to coincide with some of the data charts presented by Airly and would enable a much greater percentage of

coal to be extracted with possible increased damage to surface features (pagodas over 20 metres high, springs etc) and groundwater aquifers. The term Splitting And Quartering is used which means that after first workings (50%) they will come back and take more probably to 70% and in some cases full extraction. Again a risk of serious subsidence.

By the number of coal train movements through Capertee there is reason to believe that Airly Mine is exceeding their existing yearly quota of 1.8 million tons. Is the mining quota being monitored?

Who monitors underground extraction methods? While there are government inspectors, what frequency and how thoroughly do they inspect?

No plan to guarantee continuance of surface water and groundwater to farmers. There are reported to be about 6,000 cattle movements in the Capertee Valley per year. This means that cattle are a huge proportion of the local economy. Mix this with sheep, alpacas, goats, horses and pigs as well as fodder crops and there is a lot too be lost if the water supply is reduced or stopped. The growing eco tourist industry in the valley would also be greatly damaged by lack of water. Capertee Valley is not blessed with a huge amount of water and any reduction in water would be catastrophic for the farmers and the ecology.

As there is no mention of water treatment before overflowing from the dams into Airly Creek, I question the quality of water discharged during emergencies which would affect downstream farmers and water quality entering the Capertee and Colo Rivers in other words the Wollemi wilderness. The EIS states that only emergency discharges will occur but based on past performance there has been two recorded discharges last year in one month due to overflow from toxic dams.

Airly Coal state that a lot of the additional controls to minimise risk are to develop various plans. The plans should be developed NOW not after the EIS was published for comment.

The term 'Offsets' has appeared in the EIS without specifically stating what the intention is. The offsets should be spelt out before the EIS is approved.

Airly has stated that they are aware of sensitive surface features but in the EIS state that under the heritage shale oil workings, further subsidence of half a metre can be expected.

The coal plant will use 120 litres of water to process a ton of coal of which 80% is recycled. Rough calculations suggest that even with their current water entitlement there is insufficient water available to sustain extraction of 1.8 million tonnes per year. Airly acknowledges that creeks flow briefly and low yield of underground water suggests that farmers will be affected.

There will be underground instrumentation, what for and what type?

An issue which has received little attention is light pollution at night. Our own experience is that despite living over a substantial mountain, the light from Charbon mine is a blight on the horizon at night. Airly would create similar light pollution for its neighbours. The current stated undertaking that outdoor lights would only be used when a train is being loaded is never adhered to.

Rejects Replacement Area. There is deep concern that the rejects replacement area will be an ugly scar on the landscape and secondly feed toxic wastes from rainwater into dams which will overflow into Airly Creek.

Alarm bells ring when Dr Ian A Wright raises the question of a currently polluted Airly Creek being further polluted by this mining extension. Airly Creek flows directly into Capertee River then the Colo River in the Wollemi Wilderness. The source of the current toxic levels of the Airly Creek should be determined so that it can be fixed before more toxins are added. Logic says that as the creek rises in the Airly Mine area, the source of the toxins are due to existing mine activities.

We cannot see that Airly extension will be economical particularly as operations at Centennial's Angus Place have been terminated due to economic conditions. Within the Centennial Group, Airly was the least economical and due to it's viability, has been placed in care and maintenance twice. The EIS lacks detail of the economics of the project.

We strongly support the submissions by Capertee Valley Alliance Inc. and Dr Hadyn Washington's submission for the Colo Committee.

We ask that in its present form, the EIS be refused

Yours sincerely

Donna & Bruce Upton

