

Mining and Industry Projects
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

19 May, 2014

Dear Sir/Madam,

State Significant Project - Springvale Mine Extension (SSD 12_5594)

The Nature Conservation Council of NSW (NCC) is the peak environment body for New South Wales, representing over 120 organisations across the state. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the proposed extension of longwall mining by Centennial Coal that will impact on 1,860 hectares of forest on the Newnes Plateau. This proposed mining will cause unacceptable environmental impacts to important swamps, pagodas, and stream environments in this significant part of the Gardens of Stone region. Centennial Coal must not be allowed to simply replicate the damage it has already caused to nationally threatened upland swamps on the Newnes Plateau for which it was required by the Commonwealth Government to pay \$1.45 million in reparations.

The Springvale and the adjoining Angus Place mine extension proposals require further detailed consideration and must be subject to a Planning Assessment Commission review with concurrent public hearings. The hearing process should also take place over an extended period and allow for questions and answers.

NCC objects to the proposed discharge of up to 43.8ML/day of untreated eco-toxic mine effluent to the Cocks River via the Springvale-Delta Water Transfer Scheme (SDWTS). This inappropriate discharge is inconsistent with the Sydney Catchment Authority Sydney Drinking Water Audit 2010 recommendations that require improved treatment of such licensed discharges.

The Wallerawang Power Plant has shut down, possibly permanently. The current SDWTS proposal to provide water to this plant is not viable. Before discharge, this mine water must be treated to a standard that protects undisturbed aquatic ecosystems. The eco-toxic mine effluent has unacceptably high levels of turbidity, heavy metals (including

aluminum, zinc, copper and nickel) and salinity. The mine effluent, currently running at 12.5ML/day must be treated using reverse osmosis technology to remove all metals and salts.

Any malfunction of the SDWTS, such as following a bushfire, must not result in emergency discharges to the World Heritage Area via Wolgan River or Carne Creek. These discharges must be reinserted underground into the mine instead. The proposed duplication of the SDWTS must keep to the existing alignment. The current proposal of an unnecessary road and pipeline easement descending off Newnes Plateau will cause unacceptable scarring to a scenic part of the Gardens of Stone region.

All 1,860 hectares affected by the proposed longwall mining will be subject to surface cracking. Whole sub-catchments will be fractured to a depth of 15 to 20 metres. Surface groundwater aquifers will become more permeable and interconnected. Centennial predicts surface aquifer drawdown to range from 10 metres under ridges to 0.5 metres under shrub swamps.

The sandstone rock supporting the 41 nationally endangered swamps, and particularly the 11 shrub swamps affected by the proposal, will also develop a large number of fractures. Centennial predicts these cracks to be 5 to 50mm wide and 10 to 15 metres deep. All these nationally endangered swamps will dry out and the peat soils that support these swamps will decompose. Over a period of years eucalypts and banksias will migrate into these dying swamps as they evolve to dry land communities.

Carne Creek is currently in a pristine state, and its waters that flow through the Greater Blue Mountains World Heritage Area are of the highest standard. The extensive fracturing of the sandstone associated with longwall mining of headwater swamps will release high levels of metals, notably manganese and iron, polluting Carne Creek and making it run bright orange, just like the Wolgan River did once. Flows in Carne Creek will also become irregular. Bungleboori Creek will also be affected.

The mining footprint must be significantly lessened and mining methods reduced in intensity to protect Carne Creek, pagodas, cliffs and the nationally endangered swamps associated with these proposals.

The NCC is not satisfied that the impacts of these mining activities could be managed and mitigated by to an acceptable degree. Due to environmental threats, we urge the rejection of this proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Katherine Smolski', with a large, stylized 'K' and 'S'.

Katherine Smolski