

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

Monday 26th May, 2014

Dear Sir/Madam,

State Significant Project - Springvale Mine Extension (SSD 12_5594)
Submission by the Colo Committee

The Colo Committee objects to this proposed extension by Centennial Coal of longwall mining at the Springvale Colliery that will impact on 1,860 hectares of Newnes Plateau forest in Stage Two of the Gardens of Stone reserve proposal. The proposed mining will unacceptably impact on cliffs, pagodas, 41 nationally endangered swamps, including 11 shrub swamps, and the headwater catchments of three creeks: Marangaroo; Bungleboori and particularly Carne Creek causing reduced stream flows and water pollution.

The Colo Committee is an environment group that has been active since 1974 in the Wollemi and Gardens of Stone regions. I wrote this submission as the Hon. Secretary of the Colo Committee. However I am also an environmental scientist who has been active in studying the biodiversity and geodiversity of the Newnes plateau and Gardens of Stone regions, being the lead author of the Washington and Wray (2011) paper on the geomorphology of the pagodas in the Proceedings of the Linnaean Society of NSW. I am a plant ecologist who is also interested in geodiversity and I wrote the original nomination (as a consultant for the Blue Mountains Conservation Society) for the now successful Threatened Highland Peat Swamps on Sandstone endangered ecological community under the EPBC Act. I am thus very familiar with the upland swamps of Newnes Plateau and the GOS area, and have been actively observing the impacts of mining on the swamps and pagodas of this region since 1980. The Colo Committee wrote the original nomination for Gardens of Stone NP, which included the region under proposal.

In addition to further mitigation of potential impacts, this proposal should not be granted a long term approval, should the Department of Planning and Infrastructure (the Department) and Commission determine that this mine extension proposal be approved. The Colong Foundation proposes a staged approval with triggers requiring review of consent conditions should impacts be observed in the environmental matters of national and international significance. There has been much controversy surrounding the operations of both these underground mines. To issue an extension of the existing consent for a period of 13 years as requested by the applicant, without review would be inappropriate.

Recommendations

Two sets of hearings on the Angus Place and Springvale mining proposals should be held concurrently by the Planning Assessment Commission. The Commission should permit questioning of parties to these hearings regarding either mining proposal. The responses to these questions should be provided in a reasonable timeframe to permit all parties to submit a submission in reply if they so wish. 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. Centennial Coal must be required to consider alternative bord and pillar mining methods for its proposed Springvale extension. Centennial's Airly mine in the Capertee Valley operates to depth of 405 metres underground in the same geology, with bad mine roof conditions, including many structural defects. If Centennial can operate Airly Colliery as a bord and pillar mine, then it can also operate Springvale mine in this manner. The intensity of mining must be reduced to avoid damage to pagodas, cliffs and the many nationally endangered swamps that the current proposal puts at risk.

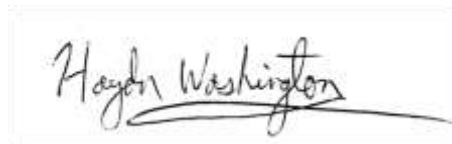
The proposed Springvale mine extension should not be granted development consent unless:

- The development consent is staged, with a review every five years;
- Consent should also be subject to performance standard triggers that ensure the health and integrity of receiving waters and heritage values;
- If a performance standard trigger level is exceeded, then the consent approval is immediately reviewed to address the failure;
- No surface cracking of stream beds, under swamps or of pagodas, rock outcrops or cliffs;
- The intensity of longwall mining is reduced so that all nationally endangered swamps are protected – this includes significantly narrowing longwalls in the northern longwalls 416 to 422 to prevent surface cracking under the best developed, largest and most intact swamps on Newnes Plateau;
- Shortening longwalls 432, 431, 430 and 429 to prevent damage to the Marrangaroo swamps, and shortening longwalls 425 and 426 to prevent Paddys Creek Swamp;
- Longwall 501 should also be shortened to protect cliffs and pagodas;
- All proposed discharge of up to 43.8ML/day of mine effluent to the Cocks River via the Springvale-Delta Water Transfer Scheme (SDWTS) is treated by reverse osmosis technology to remove salt and metals to a standard that protects, the Cocks River, the downstream drinking water supply and near-pristine ecosystems in the World Heritage Area;
- Any malfunction of SDWTS, such as following a bushfire, must not result in emergency discharges to the World Heritage Area via Wolgan River or Carne Creek but be reinserted underground into the mine;

- Reinserted mine effluent must not then re-emerge in an unauthorised or unregulated manner but be properly treated;
- No emergence of near surface groundwater with elevated levels of salt or metal precipitate in Carne Creek;
- Representative sites for the piezometers must be chosen for the groundwater in swamps and streams by a third party agency;
- Monitoring guidelines must clearly specify how the condition of groundwater dependent indicator plant species and the general condition of groundwater dependent ecosystems will be performed;
- A comprehensive, systematic pre-mining stygofauna survey must be implemented across the project area, with finer resolution taxonomic identification of stygofauna, to ensure that the diversity of stygofauna is properly assessed and potential risks of the project determined.
- All past tracks and trails created by Centennial Coal and its consultants, including those established by trail bikes, need to be recorded and plans set in place to rehabilitate these trails on an on-going basis and as soon as practicable as part of the on-going rehabilitation program for this mine.

Subsidence monitoring should be by a third party agency, such as the Office of Environment and Heritage, and monitoring should be paid for by Centennial Coal. Monitoring of surface flow and near-surface groundwater monitoring must create a comprehensive picture of the sub-catchments affected by mining. Monitoring of changes in ecosystem condition must include well exposed, wide angle impacts of affected areas with GPS co-ordinates.

Yours faithfully,

A handwritten signature in black ink, reading "Haydn Washington", with a horizontal line drawn underneath the name.

Dr Haydn Washington

Hon. Sec, The Colo Committee

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