

THE MANNING ALLIANCE INC.

“Working Strategically with the Community to Prevent Coal Seam Gas Drilling in our Valley.”

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Patron: Di Morrissey

25 January 2013

Department of Planning & Infrastructure,

Re: Stratford Extension Project

The Manning Alliance Inc. would like to submit its objection to the extension of the Stratford Mine Project. The primary areas of objection are in the area of water quantity and quality, both surface and groundwater; and dust pollution.

The Manning Valley is situated on the 250 km long Manning River. The Manning River is fed upstream by the: Avon, Rowleys, Nowendoc, Barnard, Barrington and Little Manning Rivers. Any pollution of the Avon River, or any other of the tributaries, directly impacts the Manning Valley. Over 50,000 people depend on water from the Manning River.

Objections specifically relate to:

- The proponents (Yancoal, Gloucester Resources Limited and AGL) having used different water modelling. This project should be assessed by a comprehensive and integrated modelling system encompassing cumulative effects and conducted by independent experts.
- There is a need for extensive site restoration at the completion of mining operations. This is especially pertinent for the three voids or sinks containing contaminated saline water below the current watertable in an area known for its extreme weather events. Mining sites should be restored to promote natural water flow regimes. It is unlikely that a 200m pit only 40m from an ephemeral creek such as Dog Trap Creek will not have a negative effect, especially as flow rates change seasonally. This promotes the risk of erosion of both the creek banks and bed.
- The diversion of water out of the Avon River for on-site collection and use means a permanent change of the hydrology in the area. This has severe repercussions for downstream water users, especially in times of drought.
- The exemption of “harvestable rights” for the Stratford East Dam and Return Water Dams is unacceptable with a more reasonable independently assessed management plan requiring water release into the Avon Creek based on the annual rainfall of the mine site area per year.
- Independent monitoring of the mine’s water quality and quantity needs to be addressed. This should be done in all water storage areas; upstream and downstream of mining discharge points (the solution to pollution is dilution); and where mine water is used for irrigation purposes. Water testing should be at the proponent’s expense and publicly displayed.

- The three mining projects, (Yancoal, Gloucester Resources Limited, and AGL) should be reviewed for their cumulative impact on the Gloucester Region. The significance of these three mines should be viewed by their cumulative effects in relation to the existing tourism and agricultural pursuits which pre-exist mining.
- Ongoing health studies are currently being carried on dust pollution both in Queensland and in the Hunter Valley, especially in relation to PM2.5. Dust pollution not only affects local residents, but also settles in the creeks and flushes downstream in extreme weather events.
- Yancoal should be required to carry out water testing on local resident's water tanks and pay for the cleaning of water tanks and the installation and replacement of water filters to maintain safe drinking water standards.

Tourists come to the Manning Valley for its natural beauty, pristine waterways and extensive water sports. Retirees settle in the area because of these attributes.

The Manning River, its tributaries and its outflows are the breeding grounds and nurseries of many commercial fish species and oysters. They are also home to platypus, and endangered fish species. Any degradation of water quality is not acceptable.

It is the Manning Alliance Inc.'s opinion that the proposed Stratford Extension Project should have closer scrutiny of their Environmental Impact Statements in relation to water quality and quantity; and the dust implications on the health of the Gloucester Basin inhabitants studied more extensively with particular emphasis on dust mitigation plans.

The Alliance supports and endorses the Submissions, put forward by the Barrington, Gloucester Stroud Preservation Alliance and the Gloucester Shire Council.

We also wish to put the Department of Planning & Infrastructure on notice that should any environmental incidents occur the people of the Manning Valley will hold the Department, its senior executives and its Minister, directly responsible and we will use and rely on this submission and others to publicly demonstrate professional negligence!

Kerry Anderson
Secretary