

# Submission responding to the amended Environmental Impact Statement for the Rocky Hill Coal Project SSD-5156 .

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The Committee of the Manning Clean Water Action Group Inc (“the Group”) made a submission on the initial proposal in 2013 and now confirms its thrust and makes additional submission having also taken into account the 2016 amended proposal.

## Water quality

The Group continues to object to the proposed Rocky Hill Coal Project (“the Project”) because of the risk of diminished water quality in Manning River and its tributaries including the Avon and Gloucester Rivers.

As the Environmental Impact Statement (“the EIS”) states (Section 4 page 353) “... *the river system as a whole is significant in that there are no major barriers to movement by fishes between the Pacific Ocean and the upper sections of the Waukivory Creek and the Avon River.*” The corollary of this statement is that there are no major barriers to the movement of waste from the mine, whether turbid sediment or chemical laden by products, moving throughout the Manning system downstream of the Project site.

Table A6.3 in Appendix 6 of the EIS identifies the following events being medium level risks to surface water with a likelihood of occurrence rated as “possible”:

- Runoff from rainfall event causes water release leading to **discharge of sediment-laden water** into the Avon River and Waukivory and Oaky Creeks catchments impacting upon the riverine ecology and downstream users.
- **Inflows of saline water** into alluvial groundwater system leading to pollution of alluvial water and potentially the Avon River and Waukivory and Oaky Creeks catchments.
- Water requires chemical or additional treatment before discharge leading to **retention of excess poor quality water** due to inability to discharge to surface water and groundwater systems without additional treatment.

- Erosion of upstream diversion channels leading to diversion erosion / instability on Waukivory Creek / Oaky Creek surface water catchments leading to **increased sediment loads**.

## Our unique turtle

All of these possible events pose a major risk to the Manning River Turtle (Purvis' turtle). This is significant because Purvis' turtle **occurs no where else on the planet**. If any of these events occur the opportunity to do baseline research on Purvis' turtle could be lost forever.

The impact of the Project on Purvis' turtle has not been considered in the EIS because it has been written according to the letter of the Director General of the Department of Planning's requirements rather than in the spirit of environmental protection. It is only necessary to consider the impact of the project on threatened species as listed in the Atlas of NSW wildlife. Referring to this Atlas Purvis' turtle is listed as "data deficient". In other words, even though it is found only in this one river system it is not given even a "vulnerable" status due to lack of scientific study.

Professor Arthur Georges, Chief Scientist, Institute for Applied Ecology, University of Canberra, advised the Group in 2014 that Purvis' turtle "is very distinct from other species of turtle and as such is a species of considerable conservation value. Little is known of this species and its full distribution in the river."

In a paper published in *Chelonian Conservation and Biology* in 2013, Darren Fielder mapped the morphological characters of the extant species of turtles related to Purvis' turtle against their current molecular phylogeny and so was able to obtain rare insights into the ancestral phenotype of this group of turtles.

Anecdotally the distribution of Purvis' turtle has contracted with increased pollution and turbidity in the lower reaches of the river with boat traffic and agricultural, industrial and residential discharges. In recent years it is only found in the pristine upper reaches of the catchment. Professor Georges reports having caught it in and around the Manning where it joins up with the Barnard. It is also found at Nowendoc and has been found in the Gloucester River.

Dr Bruce Chessman, NSW Office of Environment & Heritage, surveyed turtle numbers in recent years and found an ageing population, with eggs and hatchlings being predated by dogs and foxes. Even if the turtle population is currently found to be thriving it has been noted by turtle enthusiasts to be difficult to keep due to its sensitivity to water chemistry and which points to it being very vulnerable to adverse impacts from pollution in the river.

The turtle is cryptic, remaining below the water for much of the winter, emerging only occasionally to breathe – with the ability to extract oxygen from the water through blood vessels in its cloaca – it can spend up to 13 days below water.

This presents a challenge to population surveys but not as much of a challenge as overcoming the current shortage of funds for scientific research. Even \$20,000 would fund PhD research into the turtle which may be sufficient to identify its actual status – whether or not it is simply vulnerable or actually threatened or even endangered.

**If the Rocky Hill Coal Project proceeds and any of the identified “possible” risks to surface water actually occur then the opportunity to do this research will have been lost. A unique and beautiful creature may also be lost which may hold clues to the evolution of all turtles and could have been a draw card as part of the “Manning Valley – Naturally” tourist industry.**

## Noise

The Group notes that the project proposal has been amended so that it no longer includes a coal handling and preparation plant (CHPP), overland conveyor, rail loop and train load-out facility. Therefore identification of “loading trains” noise in our 2013 submission is no longer relevant. However, the amended proposal now involves truck haulage of 2 million tonnes of “run-of-mine coal” per annum and we say that a high level of daily truck traffic would contribute to at least an equivalent level of noise pollution as that from the previous proposed rail transport.

Notwithstanding that the transportation of the coal to the Stratford site will be on a private haul road, the noise will carry around the Gloucester Basin particularly as the east/west axis between the Bucketts and the Mograni Ranges is narrow in this area.

We understand that the proposed Rocky Hill Coal Mine will be just 900 metres from one residential estate, 1.9 kilometres from a second residential estate, 4.9 kilometres from the hospital and 4.7 kilometres from the high school. Given the close proximity of the mine to homes on Gloucester’s southern edge, and in Stratford, noise remains a significant concern.

## Accuracy of EIS statement

Incidentally, on the subject of topography, the Group queries the statement at paragraph 4.1.2.2 of the EIS (see Section 4 page 3) where it says that the Bucketts Range is “5km to 7km north east of the Mine Area.” Earlier in that paragraph, the Mine Area is said to be “located on the eastern side of the Stroud-Gloucester Valley.” How can a thing be on the eastern side of the valley and have the Bucketts to its north east? It is the responsibility of the EIS authors to make the relevant correction to its statement so that it accurately reflects the actual location of the proposed mine.

**Nawal Maharaj**

President/Secretary

[Manning Clean Water Action Group Inc.](#)

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