

Objection to the application for extension to the Springvale Mine



Introduction

In the *Statement of Environmental Effects: Springvale Mine Extension Project State Significant Development 5594 Modification1 Volume 1: Main Report July 2016*, Centennial Coal states that the proposed mine extension would have minimal or negligible environmental effects. However, this conclusion can only be reached by ignoring the current environmental impacts in a number of key areas.

Below are outlined the key areas of our concern about the deficiencies in the Springvale *Statement of Environmental Effects*.

Scope 2 & Scope 3 Greenhouse Gas Emissions

The Centennial Coal *Summary of Environmental, Economic and Social Impact* (page 1 iv & page 1 v, Vol 1) includes Scope 1 Greenhouse Gas Emissions but does not include the additional contribution of the mine extension to Scope 2 and Scope 3 Greenhouse Gas Emissions. Ignoring Scope 2 and Scope 3 emissions significantly understates the adverse environmental effects of the proposed extension.

Pollution of Coxs River

The Centennial Coal proposal contends that the environmental effects on water quality are minimal or negligible because mine water discharges would not significantly increase contaminants above current levels. However current levels of discharge are causing pollution of the Coxs River. There is published scientific evidence that current levels of discharge have contaminant levels which are known to adversely affect stream dwelling biota. Current discharges do not adhere to the requirement of the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 to maintain or improve water quality. Additional discharges arising from the mine extension would create additional pollution of the Coxs River.

Pipeline for waste water

The current levels of contaminant discharge are also in contention because 4nature has initiated a legal challenge to the process by which previous the development application was approved. There is currently a development application to pipe mine waste water to the nearby Mt Piper power station. At the power station the contaminants would be treated and not discharged into the Coxs River. It is essential that this pipeline project be completed before any additional levels of discharge occur from the mine extension and either use by the power station or treatment of the water be a mandatory condition of consent. Such a pipeline should be designed to handle the mine discharge water from all the Newnes Plateau underground coal mines. Measures to deal with discharge water must be able to operate for as long as the water is discharged. This means that a solution must be

found for times when the Mt Piper Power Station is temporarily or permanently out of action or decommissioned and outlast the life of the mine.

Impacts on swamps

The Centennial Coal *Summary of Environmental, Economic and Social Impact* ignores the recent evidence from the Springvale Mine Independent Monitoring Panel that current mine operations have had significant impacts on the upland swamps listed as federally listed endangered ecological communities. Furthermore, the current monitoring regime for water flows through the swamps was found to be inadequate by the Springvale Mine Independent Monitoring Panel.

Underground mining is demonstrably damaging groundwater that the upland swamps depend on, resulting in the permanent loss of the swamps and the loss of flows to creeks and waterfalls. Underground longwall panels for any mine extension must be reconfigured to avoid undermining the catchments of the upland swamps and creeks.

Conclusion

The Statement of Environmental Effects for the extension of the mine is inadequate because it ignores the current and future environmental effects on surface water in the Coxs River and impacts on the flows in upland swamps and creeks. The proposal also ignores the contribution to Scope 3 Greenhouse Gas Emissions which would form the bulk of the mine's contribution greenhouse gas emissions. Finally, the proposal ignores the exceptional cultural and biodiversity importance of the lands proposed by the community for addition to the Gardens of Stone National Park.

For these reasons we object to the proposal for an extension to the mine.

4nature Inc
President Andrew Cox
Secretary Warwick Pearse

23 August 2016