

7 May 2019

Lauren Evans
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Resource Assessments/Planning Services
GPO Box 39
SYDNEY 2001

Contact: *Jim Caddey*
Telephone: *4824 3401*
Our ref: *D2019/45236*

Dear Ms Evans

Subject: Marulan South Limestone Mine Continued Operations Project (SSD – 7009)

I refer to your e-mail dated 1 April 2018 inviting WaterNSW to provide advice on the Environmental Impact Statement (EIS) for the above project. WaterNSW appreciates the opportunity to provide detailed comments on this proposal.

The subject land is located in the declared Sydney Catchment Area. A legislative function of Water NSW is to protect and enhance the quality and quantity of water in this catchment.

WaterNSW has adopted a set of principles that establish outcomes that it considers essential to protect the drinking water supplies of the Greater Sydney region from mining impacts. The principles relevant to this project and considered in the assessment include 'Protection of water quality' and 'Sound and robust evidence regarding environmental impacts'.

Based on its review of the EIS and a site inspection, WaterNSW has the following concerns about the project:

- The potential reduction in flows in Marulan Creek of nearly 20% (from 1,023 to 829 ML/year) and the impact that this reduction would have on the ecology and thus water quality downstream in Barbers Creek.
- The long-term stability (in relation to sheet, rill and gully erosion) of all proposed overburden emplacement areas. Specialist advice and appropriate management measures should be provided to ensure overburden emplacements areas are geomorphologically stable in the long term.
- As the quarry expands and gets deeper, there are increased risks to water quality. Therefore, it is suggested that the groundwater modelling and monitoring approach be re-evaluated every 5 years.

WaterNSW request that further details are provided on all on-site sewage management systems for the mine site as these systems do not appear to meet contemporary standards. These details would include type, size and location of each system including effluent land management areas, and the number of people each system is designed for.

Notwithstanding the concerns listed above, WaterNSW considers that the project has the potential to achieve a neutral or beneficial effect (NorBE) on water quality, subject to the:

- provision of sufficient additional information, and
- the requirement for robust monitoring, reporting, and auditing programs and effective implementation of those programs.

In that regard, WaterNSW requests that the following documents be prepared in consultation with WaterNSW:

- a. the Water Management Plan, including the progressive development of a water management and monitoring systems for surface and groundwater, and
- b. the Construction Environmental Management Plan for the Marulan Creek dam.

It is further requested that WaterNSW remain a stakeholder for the proposal and any updates to relevant plans.

If you wish to discuss this letter further, please contact Jim Caddey on 4823 4201 or e-mail at environmental.assessments@waterNSW.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clay Preshaw'.

CLAY PRESRAW
Manager Catchment Protection