

Undermined Inc

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Save Our Thirlmere Lakes and Creeks

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SUBMISSION AGAINST TAHMOOR SOUTH COAL PROJECT

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Atmospheric Carbon Dioxide 410 ppm

Undermined Inc is a community action group formed to address concerns about damage caused by long wall mining in the Wollondilly Shire.

Undermined Inc campaigns for the remediation, repair and restoration of local creeks, rivers and lakes impacted by mining. Of particular concern is the damage resulting from water loss in Thirlmere Lakes National Park, an area given World Heritage status by UNESCO in 2000. As longwall coal mining has progressed, the community is concerned our environment is being dewatered, cracked, polluted, and irreparably subsided as Myrtle Creek and Redbank Creek have dried.

Undermined Inc argues our environment has to be protected in a sustainable way for the benefit of future generations. The Tahmoor South Coal Project as proposed is not sustainable, does not safeguard the natural environment, will actively destroy the physical environment and local ecological communities. Undermined Inc argues the current coal project unduly considers the short-term economic benefits to mine owners, employees and NSW Government royalties.

Summary

- The Tahmoor South Coal Project should not proceed before the colliery pumps stop extracting water produced from the west where earlier longwall mining approached closest to Thirlmere Lakes. Any delay stopping the pumps extracting water from below the level of Thirlmere Lakes delays restoration of the World Heritage status Thirlmere Lakes National Park.
- The Office of Environment and Heritage ongoing research into the drying of Thirlmere Lakes is the minimum standard of research required before new areas of coal extraction can proceed. As Undermined Inc does not want other areas to be damaged as badly as Thirlmere Lakes and Redbank Creek have been, the documentation supporting this Project is inadequate.
- Tahmoor South Coal Project must not proceed until Tahmoor Coal knows whether its longwall mining has affected Thirlmere Lakes, Myrtle Creek,

Redbank Creek and dewatered the land it has mined under, and can confidently say it will not happen again with this Project.

- Redbank Creek has subsided so much from past mining that it is unacceptably dry and polluted. This has happened due to inaccurate forecasting of the effects of long wall mining, the same forecasting used to predict the acceptability (to Tahmoor Coal) of the Project.
- Redbank Creek is a clearly visible example of damage caused by longwall mining that can not be remediated. Tahmoor Coal can only stop mining under creeks if it is to avoid damage that can not be remediated.
- Information on the sustainability and environmental acceptability of the proposed mining process is not offered to the local community affected by the mining. Undermined Inc has been asking for daily logs of produced water from Tahmoor Coal so the community can do its own autocorrelation and coherence analysis of surface water loss and rainfall. Monthly aggregated data are insufficiently detailed to understand whether improvements need to be made to mining methods to protect the environment.
- Mining companies are responsible for rehabilitation of all impacts of their mining activity including climate change, not just those at the mine site, yet this proposal does not acknowledge that responsibility.
- Environmental assessment and reporting should be on cumulative impacts, and not on individual incremental impacts.
- A robust and independently verified risk assessment framework should be established, based on probability, impact and mitigation options of mining damage.
- There should be no mining where damage cannot be rehabilitated.
- Rehabilitation funding for mine closure should be put in escrow or similarly secured and not accessible for progressive rehabilitation or diluted in other ways during mine operation.
- A monetary value should be assigned not just to economic but also to environmental and social impacts and included in Tahmoor Coal's business plan analysis.
- Rehabilitation should target return of the land to pre-mining conditions and use, not just to "safe, non-polluting and sustainable".
- There should be a watertight mechanism for this mining company to remain responsible for damage cause or discovered after mining operations cease.
- Climate change mitigation by Tahmoor Coal is neither proposed nor evaluated in the project documents.

Tahmoor South Coal Project

Undermined Inc does not want to see longwall mining under creeks in the new areas proposed to be mined, to avoid mine subsidence like Redbank Creek (and Myrtle Creek before that) has suffered. We will not accept the destruction of Dog Trap Creek, Tea Tree Hollow and their tributaries.

Undermined Inc does not want the 43.4 hectare endangered Shale Sandstone Transition Forest to be removed and destroyed by the Tahmoor South Project proposal to expand the mine waste dump. Even with biodiversity offsetting, there will be a net loss of biodiversity.

Mine Subsidence In Redbank Creek

The photo below shows mine subsidence in Redbank Creek. It shows damage done by Longwall 30. It has neither been repaired nor restored and indicates dewatering as well as unacceptable pollution by minerals flowing to the surface from underground.



Remediation of Subsided Creeks

Undermined Inc says a sustainable rehabilitation policy should be to restore mined surface landforms and subsurface conditions that are safe and sustainably close to how they were before mining and the replacement of ecological communities removed or damaged by mining in their pre-mined locations. The Tahmoor South Coal Project does not have this objective. Just meeting or almost meeting the existing State Government objectives to protect the environment might have once been acceptable, but now we know the environment is changing and community expectations are increasing, **meeting the standards required at the time when this expansion of Tahmoor Coal was planned is no longer good enough.**

It is our opinion that any introduction of engineered chemicals, grout or sealants would neither neutralise the pollution nor remediate the chemical damage to Redbank Creek and the creeks proposed to be mined under in the Tahmoor South Coal Project. Based on the assumption subsidence is dynamic and continues over time, our opinion is that repair work will not seal fissures created by subsidence during the lifetimes of people now living. It is also our opinion that engineering repairs carried out to seal water leaking through the bed of Redbank Creek will introduce worse eyesores resulting in Redbank Creek appearing less natural and less acceptable than the Creek's already distressed appearance now.

Despite the drought at the time the photo was taken in 2018, wildlife in Redbank Creek were using the water available in Redbank Creek downstream from the subsided creek bed. Wildlife might still have a chance of surviving longer in an already compromised environment if Tahmoor Coal were to offer not to mine under creeks in the proposed project area.