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## **NPA MACARTHUR - SUBMISSION RE TAHMOOR SOUTH PROJECT**

### **A. Introduction**

The Macarthur Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on this DA.

This submission is an objection to the DA.

The author has been a member of the Tahmoor Colliery Community Consultative Committee (TCCCC) for over 15 years, since its inception in 2003. She is an environment group representative on that committee and has been dismayed and saddened to witness the ongoing negative impacts of mining on the local landscape over all these years.

### **B. Reasons for objection**

NPA Macarthur objects to this proposal for the reasons below.

#### **1. Impacts on creeks**

Catastrophic impacts to Myrtle and Redbank by past and current mining, such as - creekbed fracturing, loss of surface water, contaminated water - remain unremediated even after 14 years of mining.

This current proposal predicts the same impacts to Dog Trap Ck and Tea Hollow. These are not insignificant waterways – Dog trap Ck is a 3<sup>rd</sup> order stream of which 3.1kms is to be undermined, with 14 pools considered to be at high risk. Tea Tree Hollow and tributaries are also 3<sup>rd</sup> order streams of which a total of 4.3 kms is proposed to be undermined. (EIS 11-96)

These impacts are totally unacceptable to NPA and, we believe, to the wider community. Any remediation which may eventuate, years down the track, may or may not work. Attempts at such remediation, on Waratah Rivulet for instance, have been seen to be intrusive, ugly and questionable in their effectiveness or long-term durability.

#### **2. Groundwater impacts**

The EIS predicts significant mine inflow rates, baseflow reductions in streams and drawdowns of greater than 2m to bores from the proposed mining. These impacts will persist beyond the lifespan of anyone alive today – *The model suggests that in the proposed mining footprint most of the recovery would be complete about 150 years after the cessation of the proposed development.* (EIS11-80)

As we are seeing elsewhere, longwall mining results in a general dewatering of the landscape including both surface and groundwater. This is a matter that is currently being investigated by the Independent Panel for Mining in the Catchments (IEPMC). Its first report suggests that great caution should be taken re mining approvals in our drinking water catchments while there is still so much uncertainty about the totality of mining impacts, on water quantity in particular.

It is NPA's view that this concern should extend to all landscapes. With the impacts of climate change beginning to bite, we cannot see how any proposals which will affect either surface or groundwater, to any degree, can be acceptable.

### 3. Thirlmere Lakes

The predictions in the EIS are that the mining of Tahmoor South will have "imperceptible impacts" on Thirlmere Lakes. This is, however, based on current knowledge of groundwater-surface water interactions and general hydrology of the lakes.

Meanwhile the scientific studies of the Thirlmere Lakes Research Project are still underway and will not be complete until 2020. Therefore it seems premature to state that impacts will be imperceptible before these studies and also those being undertaken by the IEPMC have produced their findings.

Too many presumptions/decisions have been made in the past based on incomplete understanding of factors involved. We would not like to see this continue.

### 4. Destruction of vegetation for the rejects emplacement area (REA)

The removal of 43.4ha of Shale-Sandstone Transition Forest (SSTF) and a further 6.2 ha of other bushland vegetation is proposed for the expansion of the REA. SSTF is listed as Critically Endangered, both at State and Federal levels. This does not prevent its destruction, though - it is simply offset. This is not a solution, however, as there is always a net loss with offsetting.

The destruction of high value vegetation for the purpose of what is just a coal waste dump, is totally unacceptable to NPA. We see this on-lease dumping of coal waste as a blatant subsidising of the fossil fuel industry by the government (ie. the taxpayers). Household waste tips run by local councils attract huge fees payable to the EPA yet coal mines can dump their waste product on their lease site for nothing. It's not surprising, then, to read in the EIS - *Based on the economic decision criteria used to evaluate the cost-benefit analysis, the expansion of the existing REA was determined to be the preferred option.* (EIS 6-7)

We are pleased to note that approval will be sought to allow commercial use to be sourced for this product. If successful, this venture will reduce the amount needing to be dumped, as happened at Westcliff with the Dendrobium rejects. This will not solve the problem entirely, though.

This approval, if successful, should require emplacement (backfilling) underground, as with the Metropolitan Mine approval in 2009, which requires that all rejects be emplaced back down the

mine by 2021. Currently they are only achieving 20% backfill emplacement but could achieve 100% if noise issues re the operation of milling equipment were overcome.

Where this method is discussed in the EIS, we note it is stated – *In the case of Tahmoor, expansion of the REA is still the preferred option for rejects disposal, from both a cost and feasibility perspective. This is because the technology required for underground codisposal is not yet sufficiently advanced in Australia.* (6-8)

This technology can work. It is used overseas and the trials at Metropolitan should be allowed to proceed. They were given 12 years to make it work and the noise issue should be able to be overcome.

This method of rejects disposal should be mandated by government with any new approvals like Tahmoor South. Without such action it will be too easy for mining companies to just continue pursuing the cheap option of dumping (emplacement) on the surface. As we have seen with Dendrobium, however, when this starts to cost, as occurred in 2011 when off-lease dumping was no longer free, then some alternatives had to be, and were found. Companies need to be forced to find better alternatives than surface emplacement or even current commercial use sources which may not always be available.

Government needs to regulate via consent conditions, the rejects disposal method of backfill emplacement. This precedent was set with Metropolitan and should not be seen as a one-off.

#### 5. Wastewater treatment

The issue of the quality of the mine wastewater discharge to the Bargo (an average of 4ML per day) has long been a concern for NPA, particularly as we have a long-standing proposal for a National Park to encompass the river. The issue of the Wastewater Treatment Plant has also been a long-running one.

We had high hopes for a resolution of this problem with the construction of the WWTP in 2015, however constant issues with its performance have persisted. The EIS states

*The WWTP was constructed at Tahmoor Underground Mine in June 2015 as part of PRP22 to improve the quality of water discharged from LDP1. Following modifications, detailed commissioning of the WWTP occurred during September to November 2018. PRP22 on EPL 1389 for the WWTP has been extended until November 2018.* (3-22)

At the final meeting of the CCC last year in December we were told that yet another 3-6 months would be required before consistent water quality results could be expected from the plant. This is extremely disappointing and quite unacceptable to NPA, especially given the years it took to get the WWTP built in the first place.

### C. Conclusion

We object to this proposal for the expansion of Tahmoor Colliery. We consider that environmental impacts to date and those predicted to continue with this expansion are unacceptable.

If mining is to continue, Government has the power to regulate mining to more fully mitigate or avoid undesirable environmental impacts - for example, by avoiding creeks and mandating backfill emplacement underground.

As many impacts, especially to groundwater, are still not even fully understood, we consider an expansion like this to be extremely unwise, if not reckless.

**Julie Sheppard**

**for and on behalf of**

**NPA Macarthur Branch**

**5.3.19**

**P.S.** The volumes of the EIS have been produced without the usual page numbering. Instead, sections are numbered, then pages within each section. This makes navigating the document needlessly difficult. All such EIS docs should required to be published in a standard format with page numbering in sequence from beginning to end.