



NIRAG Inc. (Y1992101)

President: Alex Peterson
9 Corbett Ave, Thirroul NSW 2515
Ph (02) 4267 1300
nirag@bigpond.com

NORTHERN ILLAWARRA RESIDENTS ACTION GROUP
(ABN 60 858 038 414)

22nd May 2009

Department of Planning
Attention: Alison O'Reilly
alison.o'reilly@planning.nsw.gov.au

RE: Apex Energy Exploration Project - 07_0103

The Northern Illawarra Residents Action Group (NIRAG) has a long history of involvement in environmental protection in the area. We have taken an interest in the impacts of mining in the Southern Coalfield on the rivers and catchments of the Sydney Drinking Water Catchments. We took part in the Southern Coalfield Enquiry and provided a presentation at the hearings for this enquiry.

Sydney's and Wollongong's water supplies have already been compromised by long-wall mining within the catchments of the Upper Nepean River, causing geological damage, the loss of river water and the pollution of river and groundwater. There have also been impacts on riverine and wetland habitats.

This landscape is of a highly environmentally sensitive nature, within close proximity to both Sydney and Wollongong. Some of the risks associated with this proposal include further loss of water supplies, water contamination, and continued deterioration of the health of threatened flora and fauna species and their habitats.

Australia leads the world in species extinction, and this is exacerbated by every new development which damages or compromises healthy habitat.

Given the sensitivity of the land, and its place as one of the most reliable sources of water to over 4 million Australians, the proposed 'mitigation' of these impacts is very dubious.

Furthermore, given the recent water crisis in Sydney and the Illawarra, and the impending impacts of climate change, NIRAG does not believe that there is sufficient justification for further risking the health of our catchments.

The Environmental Assessment report recognises the likelihood of toxic groundwater but there is very little information about the groundwater, its quality, location, age or movement, either horizontally or vertically. With the high environmental risks of the proposal, it is vital that this information is available before any drilling is undertaken.

Not only is there lack of scientific data to back up the proposal, but the report also recognises that there will quite possibly be a release of contaminated groundwater into the catchments from the proposed containments.

The report recognises the presence of habitat for a large number of threatened species, but does not allow that there will be an impact on these species.

In summary, NIRAG asks that:

- this proposal be rejected
- this proposal be referred to the Minister for the Environment as a Matter of National Environmental Significance

Yours sincerely,

John Croker
Hon Sec