

# **Submission**

**Alison Smith**

## **MOD 9 - Gas Management Infrastructure**

**Application Number:** DA60-03-2001-Mod-9

**Main Project:** DA60-03-2001

**Assessment Type:** SSD Modifications

**Development Type:** Coal Mining

My submission on the proposal for a modification to Development Consent (DA 60-03-2001) is in regard to water management infrastructure and sediment controls.

I note as an aside that the modification, while addressing existing needs for the safe operation of the mine, also considers possible future works that may be needed should the extension of the mine be approved by the Minister at a later date. I would ask the Department of Planning, Infrastructure and the Environment to assure themselves that the Modification does not exceed the purpose of meeting the safety requirements of the mine operation as it stands, as it would not be acceptable to progress a mine expansion that has not been through a full process of scrutiny before approval. Works required for the expansion of the mine should only be considered in the application for expansion.

My most serious concern in the case of this modification, however, is that works proposed are described as including

- “Additional water management infrastructure (e.g. sediment controls).
- Process/fire water system, including bores to pump water from and return water to the underground mine workings and pipes/tanks to convey and store this water.”

As we have seen recently, water management and sediment controls at coal mines in the Illawarra have been associated with pollution of creeks and even beaches during heavy rainfall events, with South 32 having been fined by the EPA after a pollution incident where a tailings dam failed and polluted Brandy and Water Creek in Wollongong, and another company, Wollongong Coal, currently under investigation by the EPA in relation to another incident in which coal wash was observed in a creek. Any water management and sediment control, including plans for maintenance, supervision and monitoring, should take into account expected future extreme rainfall events.

I note that, in Appendix 1 of the modification proposal, the capacity of water management facilities is based on a 5 day duration rainfall event of 89.7mm, and that this volume of 89.7mm is based on past rainfall at Wollongong and Mittagong. Of course, we have recently seen a series of extreme rainfall

events in the Illawarra, with average rainfall over a 5 day period exceeding 89.7mm, and we know that it is likely that extreme weather such as periods of heavy rain for several days, are likely to become increasingly frequent. For this reason, any modification to water management and sediment controls, especially in a catchment area, should take into account the increasing likelihood of these types of events.

The mining company's consultant's assessment and the consultation undertaken with Water NSW would have occurred prior to the extreme weather events that we have just seen in this region. It would therefore be prudent for the Department of Planning, Infrastructure and the Environment to re-visit the matter of water management and the storage of coal wash and sediment traps in light of the experience that very recent extreme weather events have offered.

I hope that the Department of Planning, Industry and the Environment will take the time needed to look thoroughly at the matter of water management and sediment traps associated with this modification, in the light of the lived experience of the recent period of heavy rainfall. In a changing climate that includes more extreme rainfall events, sediment traps and coal wash storage require additional care in relation to capacity, monitoring and plans to ensure that bushland, waterways, and residential areas are not further impacted after periods of extreme rainfall. This is even more critical in the case of water management, coal wash storage and sediment traps that are within the water catchment.