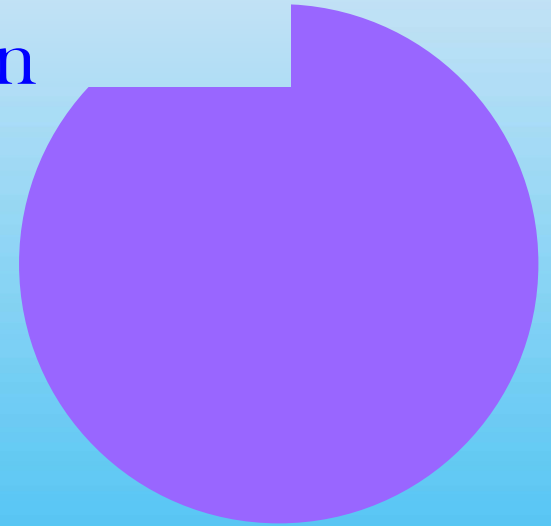


Springvale Mine Extension MOD 1 - D459/1
BMCS's supplementary presentation
to
Planning Assessment Commission
@Lithgow Friday 7 April 2017
by
Brian Marshall



Summary statements

- ▶ BMCS is opposed to the Mod at this time.
- ▶ The DPE's assessment is superficial (even sloppy) and minimises the consequences of approval.
- ▶ The DPE fails to appreciate the relationships to other current proposals soon to be referred to the PAC.
- ▶ The Mod seems immune to the need to improve water quality in the Upper Coxs R catchment and protect the few remaining endangered Newnes Plateau Swamps.
- ▶ BMCS recommends that the Mod be rejected, or at least be deferred pending resolution of the other proposals and issues.

Why superficial?

- ▶ Naivety (an increase in production and 140 jobs is surely a ‘no brainer’), perhaps a swift move by Springvale, or perhaps too much happening (for all parties) and insufficiently thought through and organized; the latter is believable!
- ▶ The DPE’s belief that the Mod should be treated as a stand-alone issue and only direct additional impacts should be assessed – this enabled such comments as the increase in intensity of extraction is minor – actually ~22% – retreat into reductionism.
- ▶ The strange belief that the Mod has no direct bearing on the other current proposals, on consent conditions aimed at reducing the impact of mine-water, the Western Coal Services Mod and toxic LDP006 discharges, and the findings of the Independent Monitoring Panel re far-field damage to swamps – all are part of the bigger picture.

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What are the other proposals?

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- ▶ Springvale Water Transfer and Treatment Project – mine water to be transferred from LDP009 (~ 19 ML/day) to the Mt Piper Power Station – this results from the need to comply with Sv Extension consent conditions – this (now modified) is currently being assessed by the DPE.
- ▶ Springvale Extension Mod 2 – Sv is asking to have certain consent conditions relating to the water quality of the LDP009 discharges modified because it hasn't time to comply with them – this is currently being assessed by the DPE.
- ▶ Springvale Western Coal Services Mod 1 is needed to accommodate the residuals stream from the Transfer and Treatment Project above – this is currently being assessed by the DPE.
- ▶ These three items are to be sent collectively to a PAC, once assessed by the DPE.

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What are the other issues? - 1

- ▶ The toxic discharges from the Western Coal Services site via LDP006 are a major source of pollution in the Upper Cocks River Catchment – BMCS wanted it resolved as part of the Transfer and Treatment Project; it is now to be dealt with as a separate issue by the EPA under the Upper Cocks River Action & Monitoring Plan; drawn-out negotiations will ensue while the pollution continues.
- ▶ The destruction of Newnes Plateau Swamps (an Endangered Ecological Community) by Springvale's LW-mining – the DPE says that there will be 'negligible' additional impacts on swamps from the modification.

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What are the other issues? - 2

- ▶ The DPE, Sv and Independent Monitoring Panel, accept there are substantial impacts on swamps, but the DPE is satisfied that these impacts “...are consistent with the approved project and that the existing consent framework is sufficiently robust to manage or offset these impacts.”
- ▶ The ‘protection’ hierarchy is avoid, minimize, offset, ‘pay the man some money’ – in reality, nothing stops the mining – it should be called a ‘destruction’ hierarchy.

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A few conclusions

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- ▶ Contrary to what is stated by the DPE, approval of Mod 1 - D459/1 would have adverse environmental outcomes.
- ▶ Increasing the production-rate by ~22% before resolving and implementing the other proposals would ensure ongoing pollution of the Upper Cocks River Catchment for, at the very least, another two years.
- ▶ Increasing the production-rate by ~22% would hasten the destruction of Newnes Plateau Shrub Swamps, an Endangered Ecological Community.
- ▶ The PAC, which approved the Sv Extension Consent Conditions, should be asked whether adaptive management was meant to protect swamps, or devise an offset system which facilitates their destruction

5/04/2017