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PLANNING ASSESSMENT COMISSION
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Wallarah 2 Coal Project
Dr Neil Shepherd
Mr Joe Woodward
Mr Garry West

Introduction

Thank you for the opportunity to address this hearing today.

The proposed Wallarah 2 Coal project is a longwall coal mine under the Central Coast valleys of Dooralong and Yarramalong. These valleys supply 53% of the water for the entire Central Coast. The Central Coast has been recognized as a regional growth area and the population is expected to increase by at least 25% to 400,000 people over the next 10-15 years, which means significant increased water demand.

Key Water and Soil Resources

The area to be impacted upon by the proposed Wallarah project contains key water and land resources.

The alluvial land in these valleys under which it is proposed to be mined has been mapped by the Department of NSW Planning & Infrastructure as being Biophysical Strategic Agricultural Land (BSAL). BSAL is the best quality land in NSW and the key purpose of the NSW Strategic Regional Land Use Policy is to nsure that BSAL is protected and not negatively impacted upon by mining operations.

Water catchments such as the Central Coast catchment are designed to be protected, as fresh water is a finite resource and as such, in 1950 these valleys were proclaimed as a water catchment district.

The importance of fresh water supplies and the potential risk to this resource from mining projects has been recognized by the Aquifer Interference Policy. This Policy was developed as projects, such as the Wallarah Project, have a high risk of negatively impacting finite fresh water supply.

Assessment Undertaken relating to BSAL – Key points

Koreas have not done enough to assess the impacts on key water and land resources. Land that is mapped as BSAL needs to be risk assessed and surveyed at a scale of 1:25,000 – this has not been done. At best is has been done at a low level reconnaissance of 1:500,000 – highly inappropriate for BSAL.

A key part of the issued Director General Requirements (DGRS) for the Project is that a detailed assessment of agricultural resources is undertaken, which includes a detailed assessment of the soil and water resources. This has not been done. Two quotes from the consultants, Environmental Earth Sciences sum this up:

> *"the soil survey results rely predominantly on desktop resources with accompanying information gathered during the site walkover .... As a result the assessment is not as accurate as one with a more detailed field and laboratory investigation component and these results are broad and limited in nature."*

> *"No intrusive works, sampling or laboratory analyses were carried out during the implementation of the scope of works."*

The identification of Rural Land Capability classes in the project area has also been based on limited information. A review of the Soil and Land Capability Assessment submitted by the Australian Coal Alliance during the exhibition period detailed the inaccuracy of the land capability assessment and how the alluvial land has been down-graded and incorrectly classified as a Sodosol.

Assessment Undertaken relating to water – key points

The proponent has clearly demonstrated that the water catchment area will be compromised. The subsidence report details the predicted subsidence for the creeks varying between 175 mm and 2,600 mm and the authors state:

> *'a number of potential impacts...'* including *'changes to stream alignment; fracturing of the bedrock in the floors of the valleys; changes to water quality; impacts on terrestrial and aquatic flora and fauna.'*

The authors also state that there will be a daily loss of water over 9.3 kilometres squared and that further losses are expected from fractures in the shallow alluvial system as a result of subsidence. There will be a loss of water from the central coast water catchment. Further, much of the water information has also been based on limited site information.

Responsibility of Government

The government has a **responsibility** to the community and a **duty of care** not to approve activities that adversely affect the community. There has been enough information presented here today in relation to health, threatened species, social consequences and water that the precautionary principle be applied. The precautionary

principle asks whether harm can be prevented instead of assessing degrees of **'acceptable'** risk.

There is sufficient evidence that river systems in NSW have been permanently damaged from the river beds being fractured from longwall coal mining with the subsequent loss of water.

Given, the risk that the Project poses to the long-term security of the Central Coast water resources, it is appropriate for the Commission to invoke the precautionary **principle and** recommend that this potential damage be avoided as the level of impact is uncertain and the risk to resources high.

Conclusion

The land to be impacted upon contains valuable water and land resources that service a booming population in what is becoming part of the greater Sydney region. The proponent has had sufficient time to address the Strategic Policy requirements, which were adopted in March 2011, but the proponent has neglected to address the issues relating to BSAL and soil and water resources.

I ask you as **the commission** considering and making a recommendation to the State Government to apply this precautionary principle. It is not only the current generation that will bear the consequences of the potential damage from this longwall coal mine, it is the **future generations**. There should only be one recommendation put forward to the government - **that this longwall coal mine should not be approved.**

Thank you for your attention particularly at the end of a long day.

Sandra Norman,