[redacted]

Mr Brian Gilligan
Chair
Planning Assessment Commission
GPO Box 3415
Sydney NSW 2001

Dear Mr Gilligan,

Proposal R031/15 - Springvale Mine Extension Project

[redacted] is jointly appointed by the Commonwealth and State Environment Ministers to advise on matters relating to the protection, conservation, presentation and management of the [redacted]

The [redacted] was inscribed on the World Heritage List in 2000. Matters that contributed to the decision that the property has Outstanding Universal Value included fulfilment of two natural value criteria (ix and x), which specify that properties should:

- be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh-water, coastal and marine ecosystems and communities of plants and animals; and
- contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

The [redacted] features outstanding habitat diversity, numerous plant and animal taxa, including many plants and animals of high conservation significance. Assessment of integrity and authenticity, as well as provisions for protection and management, also contributed to the assessed Outstanding Universal Value of the [redacted]

The [redacted] does not exist in isolation and adjacent land uses have the potential to impact on the heritage values of the [redacted] Complementary management of adjoining land is critical to the long-term maintenance of the Area's integrity. The Advisory Committee is therefore concerned that actions on lands surrounding the [redacted] should not impact detrimentally on the Outstanding Universal Value which underpins the inscription of [redacted] on the World Heritage List.

Objection

The Advisory Committee considers that the proposed extensions of underground longwall mining at Springvale Colliery should not be approved. These proposed extensions have the potential to cause significant environmental impacts on nationally endangered swamp ecosystems and associated streams on Newnes Plateau, and may impact detrimentally on the [redacted]

Potential impacts on Newnes Plateau Shrub Swamps
The proposed mine extensions have the potential to lead to subsidence and the subsequent degradation and potential destruction of several Newnes Plateau Shrub Swamps. Newnes Plateau Shrub Swamps are listed as an Endangered Ecological Community under both the NSW *Threatened Species Conservation Act 1995* (Newnes Plateau Shrub Swamp in the Sydney Basin Bioregion) and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (Temperate Highland Peat Swamps on Sandstone, THPSS). These swamps are also important as they act to filter and regulate the flow of water in a number of the Newnes Plateau streams that flow into the [redacted]

The submissions by the Office of Environment and Heritage and the Expert Scientific Committee on Coal Seam Gas and Large Coal Development, state that the hydrological characteristics of the THPSS are such that undermining could cause severe and irreparable damage. The IESC submission states “the only known strategy to minimise impacts to THPSS is to alter the mine layout such that swamps are not undermined by longwall panels and longwalls are located such that tensile and compressive strains at these sites are below 0.5 mm/m and 2 mm/m respectively”. (IESC 2014-054: Springvale Mine Extension Project, p2).

Potential impacts on water quality in the [redacted]
The proposed extension of Springvale mine would also significantly reduce the water quality of Creek and the Coxs River. The EPA’s submission states "the EPA is unable to support the expansions in their current form given the absence of any commitment in the EIS to address the handling/treatment of the mine water in either the long or short term." (EPA, ref 14/50035-01, p2).

Conclusion
The Newnes Plateau Shrub Swamps, particularly those in Carne Creek catchment, are of great scientific and biological value. These swamps also play an important role in protecting the integrity, which is part of the ‘Outstanding Universal Value’ of the [redacted] as they act to filter and regulate the flow of water into Carne Creek and thus into the World Heritage Area. It is important that these swamps not be impacted by the proposed mining.

If you would like more information about the [redacted] Advisory Committee, please contact the [redacted]

Yours sincerely,

Prof Richard Mackay, AM
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