From: [redacted]
To: pac pac
Subject: Submission as an objection to proposal R033/15 - Airly Mine Extension Project
Date: Monday, 21 September 2015 9:25:35 PM

Ms Robyn Kruk AM
Chair
Planning Assessment Commission
GPO Box 3415
Sydney NSW 2001

Dear Ms Kruk,

Submission as an objection to proposal R033/15 - Airly Mine Extension Project

I request that the Planning Assessment Commission (the PAC) recommend refusal of consent, as Centennial Coal has not kept its promise to retain half the coal under all areas mined. If the alternative proposal to limit the damage to the 40 kilometres of cliff line to two per cent in this reserve were adopted, it would permit up to 800 metres of unacceptable cliff falls.

All the high cliffs, as well as pagodas, the Grotto, the Valley of the Kings and the historical New Hartley Oil Shale Mine of the Mugii Murum-ban State Conservation Area must be defined as sensitive heritage of special significance and fully protected from subsidence impacts. In addition, cliffs over 50 metres in height, such as those of Genowlan Point and Point Hatteras, should not be undermined, even for ‘first workings’.

Commissioner, the 2013 mining policy required resource economics to be the primary consideration in decision making processes. Under this policy, the Department of Planning and Environment’s project assessment report discounted natural and cultural heritage protection. For example, the Department has recommended ‘efficient recovery of the coal resource’ in the New Hartley mine interaction area, putting pagodas, cliffs and cultural heritage at risk of damage. Under the September 2015 policy, mining under the interaction area, high cliffs and talus slopes should be restricted to first workings. Such coal conservation thinking should not be a consideration in our climate changing world.

The Department also failed to recommend conditions which ensure the health of streams. The pit top must be placed in a ‘restricted release zone’. The Environment Protection Licence must specify and limit all pollutants discharged from this zone to ensure a neutral or beneficial effect on water chemistry and aquatic life in the downstream national parks and the World Heritage Area.

Toxic mine effluent must be minimised by separating clean runoff from the toxic cocktail of mine water make, bore process water and runoff in the pit top area. The proposed coal preparation plant must be required to use chemically polluted water stored on site in the restricted release zone until exhausted before using other water sources.

Centennial must provide alternative water resources to replace those lost due to mining, such as at the Village Spring in the oil shale ruins precinct. A small roofed area, with storage tank should be provided at suitable sites to provide park visitors with replacement water sources. Without water, the ability to visit the area becomes restricted.

The proposed coal reject emplacement area must be adequately screened from Glen Davis Road, so that tourists to the largest canyon in the world, the scenic Capertee Valley, are not welcomed by the blight of Centennial's 50Mt megadump and ensure noise levels emitted from the mine be kept to below background noise levels at the Airly Gap area and other important destinations of quiet recreation.

Today's mining industry must also clean up the blight of past mining operations. The exposed toxic mine waste dumps associated with historical oil shale works in the head catchment of Torbane Creek must be rehabilitated by Centennial to reduce pollution runoff to acceptable levels.

Centennial Coal should, as a responsible corporate citizen, transfer all suitable bushland it owns to the NPWS for addition to the Mugii Murum-ban State Conservation Area.

Yours sincerely,

David Fogg

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