From: [redacted]
To: pac pac
Subject: Submission as an objection to proposal R032/15 - Springvale Mine Extension Project
Date: Thursday, 27 August 2015 10:44:06 AM

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

Dear Mr Gilligan,

Submission as an objection to proposal R032/15 - Springvale Mine Extension Project

I request that the Planning Assessment Commission (the PAC) recommend refusal of consent, as Centennial Coal has not modified Springvale mine extension proposal to protect World Heritage, National Heritage and the Coxs River, and in consequence the mine would cause unreasonable damage to these important values.

I believe that the Minister for Planning, Rob Stokes, acted properly in requesting a second review hearing as important environmental concerns were not adequately considered under the existing mining policy. The current mining policy requires economics of the resource to be the primary consideration in decision making processes. Under this policy, both of the Department of Environment and Planning's assessment and addendum reports for this proposal unreasonably discounted the value of the natural environment and the need for its continued protection.

The Department's brief consideration of the draft mining policy in its addendum assessment report failed to consider whether future mine regulations will produce a better or a worse environmental outcome than existing mining arrangements. The intent of the draft mining policy is to ensure at the very least that future mining will not produce worse environmental outcomes. The Department's recommended conditions associated with the addendum assessment should at least ensure that the environment is no worse off during future mining operations than under existing operations. The Department's proposed conditions fail that test.

The Department failed to recommend conditions that ensure the health of streams and nationally endangered swamps on Newnes Plateau. The Department's assessment reports ignore the protection considerations contained in the 2014 NSW Government's biodiversity offsets policy for major projects. The Department did not consider how swamp impacts can be avoided and minimised under this policy, before being offset. The Department's assessment also ignored the precedent established by Federal Environment Minister that has protected two important Newnes Plateau swamps from being undermined by last three longwalls - 415, 416 and 417 at the Springvale mine.

In accordance with the offset policy when read with Federal Government's swamp protection precedent, if the Commission decides to recommend approval for this proposal it must also recommend a condition to protect all nationally threatened swamps. If the recommendation does not seek to protect these swamps, then that recommendation could not be consisted with the draft SEPP.

I also bring to your attention that the Department of Environment and Planning made what I believe is an incorrect decision in recommending that mine effluent discharges to the Coxs River may continue. The Department has assumed an environmental benefit to the Coxs River from the proposed limited treatment of mine effluent, but this is incorrect. The correct baseline was established when the development consent for this mine extension was lodged. At that time, the Springvale mine diverted its effluent to the Wallerawang Power Plant. This decision to transfer effluent to that power plant eliminated the environmental discharges from the mine to the Coxs River. The new proposal must replicate this arrangement if it is not to significantly lower environmental outcomes for our drinking water supplies.

Springvale's salt laden effluent must be adequately treated to a suitable standard and then piped directly to Mt Piper power plant, otherwise aquatic life from its point of entry to Coxs River downstream through the World Heritage Area to the stored waters of Lake Burragorang cannot flourish.

In line with the past waste elimination practice, I further request that if the Commission recommends approval of this proposal it must also recommend Springvale’s treated mine effluent be transferred directly by pipeline to the Mt Piper power plant. As Mt Piper does not discharge effluent, the Coxs River can be restored to health. The removal of this mine's toxic effluent will help to protect Sydney's Drinking Water Supply and the integrity of the Greater Blue Mountains World Heritage Area.

Thank you for considering this submission as an objection to the Springvale Mine Extension Project.

Yours sincerely,

Ian Shadwell
[redacted]
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