From: [redacted]
To: pac pac
Subject: Submission as an objection to proposal R032/15 - Springvale Mine Extension Project
Date: Thursday, 3 September 2015 10:00:08 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 the Springvale mine extension proposal to adequately protect World Heritage, National Heritage, the Coxs River, and Sydney's water supply.

The PAC previously supported the proposal with recommendations about improving the protection of swamps and resolving the pollution of the Coxs River by discharges of mine-water effluent. The PAC noted in its summation that the "benefits As Currently Understood (my emphasis) outweigh its potential impacts".

The "understanding" has changed: the swamps remain inadequately protected, the polluting discharges to the Coxs River remain unresolved, and the Minister for Planning, Rob Stokes, has requested a second review hearing with particular reference to the changes in the now amended mining SEPP, 2015.

The previous mining policy required economics to be the primary consideration in decision making processes. Under this policy, both of the Department of Environment and Planning's assessment reports for this proposal unreasonably discounted the value of the natural environment and the need for its continued protection. The Department did not therefore recommended conditions that adequately protect the natural environment.

Likewise, the Department failed to recommend conditions which ensure the health of streams and nationally endangered swamps on Newnes Plateau. The Department's assessment ignored the 2014 NSW Government's biodiversity offsets policy for major projects by not adequately considering how swamp impacts can be avoided and minimised, before resorting to offsets. Avoiding and minimisation saves the swamp; offsetting sanctions their potential destruction.

In accordance with the offset policy and the State and Federal Government's listing of swamps for maximum protection, the Commission, if opting to recommend approval for this proposal, should also recommend a condition to protect all nationally threatened swamps.

The Department has seemingly made an incorrect decision in recommending that mine effluent discharges to the Coxs River be continued. The Department has apparently assumed that the proposed limited treatment of mine effluent environmentally benefits the Coxs River, but this disregards the original baseline as established when the development consent for this mine extension was lodged. Originally, Springvale mine diverted its effluent to the

Wallerawang Power Plant, thereby eliminating the mine’s environmentally-impacting discharges to the Coxs River. The new proposal must ensure a similar outcome.

Only by treating Springvale's salt laden effluent to a suitable standard and then directly piping it to the Mt Piper Power Plant, will it be possible to avoid compromising aquatic life in the Upper Coxs R and onward downstream through the World Heritage Area into the stored waters of Lake Burragorang. 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,

Stuart Ellis
[redacted]
Thursday, September 3, 2015 - 09:59