

Planning Assessment Commission Review

Wilpinjong Extension Project RO39-16

Submission of Objection

The proposed project is an extension of the approved Wilpinjong Coal Mine (WEP) located within incised Permian Coal measures within discharge and recharge areas of the Greater Wollar catchment, which flows into the Goulburn River Upper Hunter Valley.

Changes to the flow regime (e.g. volume, timing, frequency and duration) and water quality including point and diffuse discharge of contaminants activated and mobilised from this large open cut mine pose a serious risk and long term threat to the health and viability of downstream ecosystems and water users.

Significant concerns, including from the Independent Expert Scientific Committee (IESC 2016-075) have raised questions about the adequacy of the WEP surface and groundwater assessment and long term cumulative impacts on water.

These include:

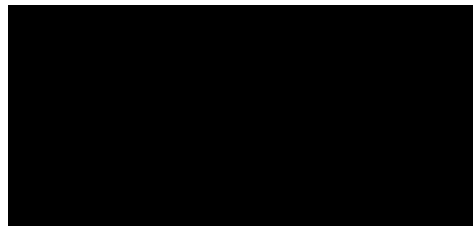
1. Inadequate evidence to demonstrate the effectiveness of the existing management strategies. WEP has not quantified the current level of impact nor provided reasonable strategies to effectively avoid, mitigate or reduce the likelihood, extent and significance of impacts to significant water-related resources into the future.
2. Low confidence in the groundwater modelling predictions due to inadequate model verification and insufficient evidence to support boundary assumptions and parameter properties (e.g. horizontal and vertical hydrogeological permeability's).
3. Baseline data has not been provided. The background information and description of sampling methodologies supplied is insufficient to assess pre-mining baseline conditions. Monitoring data presented is limited in scope and not contiguous. This prevents adequate analysis of trends in major ions concentrations over time (e.g. metals) and interrogation of existing mining impacts.
4. There is insufficient spatial and temporal monitoring of surface water and groundwater, including event-based monitoring of surface water quality
5. There is inadequate risk assessment and response planning for unexpected discharge of mine and sediment affected water in periods of high intensity rainfall during and post mining. Post mining voids pose a serious threat to groundwater quality and the connected creek system. All final voids must be backfilled.

6. No testing supplied for overburden, interburden, spoil placement areas or coal reject materials for solubility and leaching of contaminants from the existing Wilpinjong Coal Mine
7. Current mine water discharges from the WEP only include EC, oil and grease, pH. Other contaminants may be released from the site without detection. Water quality data in the assessment reports are not sufficient for this risk to be assessed.
8. WEP water management plans are not provided in the assessment. It is not possible to determine the effectiveness of these plans at mitigating or reducing impacts from the proposed project.

WEP has not adequately addressed these serious water related issues. DPE & the WEP have also failed to recognise the significance of noise and dust impacts on remaining residents outside Wollar as well as increased isolation, loss of emergency services and stranded assets.

I object to the extension of Wilpinjong Mine and urge the PAC to recommend against its approval.

Yours sincerely,



Julia Imrie BSc. Grad Dip Water Resource Planning,
'Gleniston' Ulan
PhD Candidate
Fenner School of Environment and Society
College of Medicine, Biology and Environment
Australian National University