



Rivers SOS

Presentation

Planning Assessment Commission
Public Meeting Singleton
Tuesday 8 November 2016

Wambo Mine – MOD 12 – Southern Longwall Modifications – D435/16

The Rivers SOS Alliance was formed over 12 years ago by concerned citizens in NSW who were impacted by damage caused to water ways from large coal mining projects.

One of those prominent projects was the Wambo Coal Mine.

The impacts of Wambo Mine on surrounding surface and groundwater sources has been significant for a period of nearly 40 years. The ongoing damage to Wollombi Brook, Wambo Creek, Wambo Creek North, Stony Creek and associated alluvial aquifer systems is permanent and should not be increased.

There is a regional zone of depresurisation in the groundwater associated with coal measures within the Wambo area and adjoining mining operations. This is a cumulative impact of the intensive mining activities in this part of the Hunter.

There is not enough information available to understand the connectivity between surface and groundwater sources and how this has been permanently impacted by mining.

The fact that Wollombi Brook has changed from a gaining stream to a losing stream due to the complex history of mining in the area is a very disturbing demonstration of the cumulative impact of existing operations. These impacts cannot be allowed to continue.

The Hunter River and its tributaries, especially Wollombi Brook, are being sacrificed for the coal industry with no understanding of the implications for future generations.

The impacts of mining on Wambo Creek and the failure to regulate compliance with conditions of approval demonstrates a major failing of the planning system in NSW.

The environmental assessment conducted in 1991 identified Wambo Creek as a permanent stream. The 2003 assessment for further mine expansion identified Wambo Creek as an intermittent stream. The latest assessment for major changes to mining operations classes Wambo Creek as an ephemeral stream.

The only thing that has changed over this 20 year period has been the impact of Wambo mining operations on Wambo Creek. It is of concern that subsidence impacts are still occurring on private land and affecting water supply well after the mining in those areas has finished.

Rivers SOS considers that there are a number of significant issues with the proposed modification to the Wambo Mine that the Department of Planning either chooses to ignore, brushes aside or pushes to post approval management plans.

We do not support the conclusion that there will be limited and acceptable environmental impacts from the proposal.

DPI water has raised a number of key issues that are not adequately addressed by Planning. These include:

1. exacerbated fracturing caused by the proposed shift from the deeper approved Bowfield Seam to the shallower Woodlands Hill Seam
2. potential of significant hydraulic connectivity that needs further investigation
3. potential to expedite the release of additional soluble salts
4. the failure to implement additional groundwater monitoring below South Wambo Dam

The EPA has previously raised concerns with high salinity readings in Wollombi Brook in relation to the function of the Hunter River Salinity Trading Scheme. This problem is highly likely to be associated with mining impacts and needs further assessment.

The Federal Independent Expert Science Committee (IESC) has also raised a number of key issues to do with water impacts that are not adequately addressed by the proponent or Planning.

The issue of the water models needs to be closely considered by the PAC.

The IESC has commented on the adequacy of both the surface water and groundwater models. The Planning report outlines some deplorable reasons for the fact that stream flow modelling for the impacted creeks was based on stream flow data from different catchments.

The reasons given is that available monitoring records at Wambo do not provide an adequate basis for characterising long-term average flow regimes. This is for a mine that has been operating since 1969.

Planning maintains that the relatively short duration of available records and missing records due to equipment failure has caused the lack of available stream flow data.

Rivers SOS considers this to be a major exposure of the lack of regulation and compliance at the Wambo Mine site. The poor monitoring or lack of monitoring over time in the heavily impacted creek systems, such as Wambo Creek, can be interpreted as a cover up.

We consider that all current areas of impact from present and past approvals of operations at Wambo Mine must be independently assessed.

The issue of regulation and compliance with existing conditions of approval must also be investigated.

The IESC identifies a range of information gaps in assessment of the proposal that limits their ability to adequately assess the significance of the impacts of the proposal.

We contend that the PAC is in a similar position and has not been provided with adequate information to make a determination on this significant set of changes to the Wambo Mine.

As the information stands, with no independent review of the subsidence model, Wambo Creek and Stony Creek will experience an increase in maximum predicted total subsidence, maximum predicted total tilt and maximum predicted total hogging curvatures. Wambo Creek will also be predicted to suffer increased maximum predicted total sagging curvature.

North Wambo Creek Diversion, already an environmental impact on the natural stream, is predicted to be impacted by very large changes in subsidence with the proposal to shift extraction to the higher Woodlands Hill coal seam.

Rivers SOS maintains that the Wambo Mine has been an unmitigated environmental disaster over many years. There appears to be limited desire on the part of the owners to comply with conditions of approval and no demonstrated enforcement by the regulators.

The ongoing problems with the environmental integrity of Wambo Creek is a prime reason why the community lacks faith in the planning system.

Our water sources are critical to present and future opportunities for a healthy and productive life in the Hunter Region. The ongoing sacrifice of this most essential element is irresponsible and cannot be justified.

Rivers SOS implores the PAC to consider the significance of proposal before them and apply the precautionary principle, as required under the objective of ecologically sustainable development.

Please do not approve the ongoing damage to water sources in the Wambo area.