PLANNING ASSESSMENT COMMISSION
Wallarah 2 Coal Project
2 April 2014
WSC Issues with Wallarah 2 Coal Project

- Impact on groundwater
- Impact on surface water
- Impact on flooding
- Impact on subsidence
- Impact of construction phase on water quality
- Heavy reliance of conditions and plans of management
- Impact on Buttonderry Waste facility
- Impact on water supply
- The risk of uncertainty is too great
Independent Analysis of EIS

- WSC engaged two (2) independent Consultants
- Pells Sullivan Meynink Consultants (PSM) to review the geological and water implications
- Earth Systems to review potential environmental and planning implications
- BOTH identified gaps and inconsistencies in EIS and data modelling
- Earth Systems also reviewed the Response to Submissions
Dooralong and Yarramalong Valleys

- Dooralong and Yarramalong Valleys form part of the regions surface water catchment
- Groundwaters support the baseflow of the creeks and rivers of the valley
- Landuses consist mainly of rural living, agriculture and tourist accommodation
- Existing water catchment to service future development and population growth for CC region.
Impact on groundwater

- The EIS *underestimates* the potential impacts on groundwater
- Input parameters for modelling not consistent with available data or modelling within the EIS
- 500 years for groundwater pressures to fully recover
- No certainty of the impact on groundwater that feeds the streams of Dooralong and Yarramalong Valley
- Mitigation measures on groundwater quality not articulated
Loss of surface water

- Surface water loss from streams is LESS WATER for WYONG and GOSFORD LGA’s
- LESS water for Valley BUSINESSES such as turf farms and agriculture
- Increased ponding in streams from subsidence
- The 2.5ML/day water use by the mine is more than half of the existing median flow rates of the creek
- High level of uncertainty based on the assumptions used
Impact on flooding

- Flood assessment approach reasonable HOWEVER was based on conservative subsidence modelling
- Some impact and mitigation measures proposed
- Council has some concern over the longer term maintenance requirements of the mitigation measures
Impact of subsidence

- Predictions of subsidence impacts in EIS conservative and require further sensitivity analysis
- The predictive model used not regarded as best practice
- The modelling fails the DG’s “reasonable level of confidence test”
- Measures to mitigate general in nature
Impact on Buttonderry Waste Facility

• Close proximity of the Buttonderry Waste Management Facility – Critical waste management infrastructure for the region
• Life expectancy of between 120 and 200 years
• Potential subsidence impacts and loss of geotechnical integrity have not been fully considered
• Conditions do not require dilapidation reports in order to assess any future impacts on the facility
Impact on water supply

- Water supply is the last user on Wyong River
- Water Supply access rules based on:
  - Fishway operation and
  - % of daily flow
- Less water at weir means less water available for town water supply
Water Licencing issues

- Transferring inactive licenced share components to new activity results in less water in river
- Water Management Act 2000 provides for town water supplies to have priority of access during water shortage
- Pumps can be turned off, mining effects cannot
- In practice the water supply will have lower priority of access than the mine
- In practice the water supply will have less access and less secure access to water than currently
Risks to Water Resources

- There are risks and uncertainty regarding the impact of the mine on the water resources
- Independent consultants identify the risks greater than assessed in the EIS
- Impacts will be most pronounced on downstream water users during water shortages
- If mine has greater impact than anticipated, in practice the impact will be borne by the downstream water users
Conditions of Consent

- Request that compensatory conditions be applied
- Request that no disposal of brine or mine water to sewer
- Request connection of potable water to the Buttonderry and Tooheys Road sites
- Request sewage connection to Buttonderry and Tooheys Road sites
- Connections in accordance with Council’s requirements
Conditions of Consent

- Request an unconditional bond of $20m held by WSC, provided by the Applicant to be drawn upon for investigations and remediation of unfavourable monitoring results and infrastructure damage.
- Request that operations cease when monitoring samples identify water quality and quantity anomalies or negative trends.
- Request that the proposed Voluntary Planning Agreement is given certainty in the consent to deliver an appropriate public benefit for the community.
Conclusion

• In short, WSC opposes the mine based on a precautionary approach and the risk and uncertainty of actual impacts
• WSC request the inclusion of additional conditions to address any loss of water quality/supply.
• WSC request that a bond be put in place to draw upon to remediate any impacts from mining activities
• Protection of critical infrastructure
• Should the Coal Project be approved, that the conditions imposed are rigorously enforced

THANK YOU