Submission

Public Planning Assessment Commission Meeting

Wallarah 2 Longwall Mine Coal Project

Wednesday 2 April 2014

The Nature Conservation Council of NSW (NCC) is a non-profit, non-government organisation representing more than 120 community environment groups across NSW. We have long-standing experience in state environmental assessment and planning and are extremely concerned with the proposal to develop the Wallarah 2 longwall coal mine in the Wyong Local Government Area (LGA), on the Central Coast.

NCC submitted an objection to the proposed Wyong coal project when it was exhibited for public comment in June 2013. Our position on this proposal has remained unchanged.

This project has already been refused under the previous government due to unacceptable impacts on the community and the environment. It is irresponsible to consider developing this mine and we urge the Planning Assessment Commission to refuse this protect once and for all.

In this submission NCC wishes to address a number of issues relating to impacts on water quality, ecology, climate, habitat loss, subsidence and Aboriginal cultural heritage.

NCC objects to the proposal on the following grounds.

Subsidence and water threats

The Wallarah 2 longwall coal mine would undermine drinking water catchments northwest of Wyong. The project will undermine several waterways causing subsidence, which could cause serious and permanent damage to local aquifers, surface water environments and water supplies.

In its submission on this project the Office of Environment and Heritage (OEH) states that the mine layout poses significant environmental risk resulting from subsidence to the the Jilliby State Conservation Area and this area warrants protection [3].

OEH proposes that the proponent of Wallarah 2 redesign the longwall layout and avoid extracting coal under Little Jilliby Jilliby Creek, Myrtle Creek, Armstrong Creek and Jilliby Jilliby within the State Conservation Area. Mining these sensitive areas has the potential to permanently damage, ground
water aquifers, surface waters systems, threatened ecological communities and habitat for threatened species.

Little Jilliby Jilliby Creek is a particularly significant stream with high conservation value. Subsidence from coal extraction under this creek will lead to loss of water flow and cause significant impact to the fauna of the area including threatened frog species; Litoria aurea (Green and Golden Bell Frog), Mixophyes balbus (Stuttering Frog) and Mixophyes iteratus (Giant Barred Frog). Furthermore, subsidence is predicted to cause this creek to fracture and drain.

The mine will be directly beneath the Central Coast’s major water catchment area. It puts approximately 300,000 people within the Wyong and Gosford area and 53% of the water catchment area supplying these residents at risk.

The key issues facing groundwater and surface waters from this development are drawdown and aquifer depressurisation, downstream river flow losses, water quality impacts and salinity. These impacts will have an effect on catchment water resources threatening water quality and availability in the region, which poses inherent risk to the land, biota and community of the Central Coast.

Last year, we saw first hand the catastrophic damage subsidence can cause in the nearby Sugarloaf State Conservation Area, when a botched remediation job turned a pristine stream and surrounding area into a river of concrete.

Subsidence at the Wallarah 2 longwall mine poses significant danger to the Jilliby State Conservation Area. Ignoring the risks could result in a repeat of the environmental damage seen at Sugarloaf Conservation Area.

In 2011 OEH raised concerns that longwall mining could damage creeks in the Sugarloaf Conservation Area and urged Xstrata, to avoid mining this area. This advise was disregarded and on 2 October 2012 extensive mine subsidence occurred resulting in land slides, damaging creeks and creating large voids. To mitigate this damage, inadequate remediation work was carried out in an attempt to grout extensive cracks in the landscape and 75 cubic meters of grout was spilt into a stream within the conservation area.

There have been significant environmental impacts at the Metropolitan Colliery in Sydney’s drinking water catchment and West Wallsend Colliery in Sugarloaf Conservation Area where subsidence exceeded expectations. These experiences should not be repeated at Wallarah 2.

Air quality and community impacts

This proposed mine will be placed amid new growing suburbs, putting the health of these residents at risk. The development of the mine and extract and transport of the coal will cause the release of particulate matter (PM 10 and PM 2.5). Short-term exposure to particulate matter pollution can lead to diminished lung function, damage and inflammation of lung tissue, increased mortality rates in children and young adults, aggravation of asthma symptoms, heightened risk of cardiac arrhythmias, heart attacks and other cardiovascular issues.

This project should be refused based on the health risks associated with air pollution from mining, stockpiling and transporting coal. It should also be refused on the risk of subsidence draining water and negatively impacting surrounding suburbs.
Threatened species

The proposed mine could have a significant adverse impact on native plants and animals in the region. Thirty-seven recorded threatened and migratory fauna species and six vulnerable or endangered flora species are within the project site, including: Lathamus discolor (Swift Parrot), Xanthomysa phrygia, Tyto tenebricosa (Sooty Owl), Xenus cinereus (Terek Sandpiper), Pandion haliaetus (Osprey), Limosa limosa (Black-tailed Godwit), Ixobrychus flavicollis (Black Bittern), Haematopus longirostris (Pied Oystercatcher) and Haematopus fuliginosus (Sooty Oystercatcher). These species are protected under state and federal legislation.

Furthermore, 19 species of avian migratory waders in the area are also protected under the Federal EPBC Act with binding agreements with China (CAMBA), Japan (JAMBA) and South Korea (ROKAMBA). There are also flora species listed as threatened under the Act and local fauna species listed as endangered under the Act with the proposed mining area [1].

The key threats to these species include land clearing, change in habitat due to subsidence and alteration of water flow, wetlands and floodplains and contamination of land and water.

All of these threats are possible effects of this project. The cumulative loss of threatened species habitat in NSW means that many native flora and fauna species are facing an extremely high risk of extinction in NSW into future.

The Jilliby State Conservation Area was created on 1 July 2003 and protects important areas of remnant forest ecosystems at the head of major water catchments. Historically the area was used for logging however it contains important habitat and intact natural landscapes and is a significant ecological corridor stretching along the coastal ranges.

The Jilliby State Conservation Area offers the community a diverse range of ecologically sustainable recreational opportunities, whilst ensuring that environmental values are protected. This area should not be undermined.

Contribution to climate change

The purpose of the Wallarah 2 project is to supply up to 5 million tonnes of coal per annum for 28 years, under long-term contracts, to South Korea. When burned this coal will contribute significantly to climate change, producing up to 12 mega tonnes of CO₂ a year for the life of the mine. This is an unacceptable increase in the state’s greenhouse gas emissions and will add to the severe and long-term environmental impacts of increased climate change.

Increased CO₂ levels are causing warming of the atmosphere and oceans, the breakup of ice sheets, glacial retreat, sea level rise and ocean acidification. At present Australia is seeing the impacts of climate change with more severe and frequent events such as droughts, bushfires, heat waves, floods and cyclones. The Wallarah 2 coal project will generate new greenhouse gas emissions directly conflicting with state and federal policies to reduce climate change emissions.

Aboriginal cultural heritage

The Darkinjung Aboriginals reject the mine proposal, which will impact their land, according to their rights under the Aboriginal land rights Act and the planning laws of NSW. The mine site is located
within the Tuggerah Lakes Basin; however the extraction area lies in the Jilliby Jilliby Creek catchment. This land owned by the Darkinjung Aboriginal Land Council, contains protected species habitat and historical and Aboriginal cultural heritage sites and should not be destroyed for short-term profit.

Conclusion

This proposal has the potential to create long-term damage to the Central Coast drinking water catchment, threatened species, and the health of the surrounding region. Further, this proposal does not benefit the Central Coast, with the coal being mined mainly for export to South Korea.

The Wallarah 2 mine would add to the environmental impacts from the cumulative effects of the rapidly growing coal industry in NSW. The project goes against the principles of Ecologically Sustainable Development [2] as it would substantially degrade the ecological character of Wyong LGA and the Central Coast. The NSW government needs to manage and protect our state environmental assets so that they can continue to provide valuable environmental services to the state. The threats to the Jilliby Jilliby State Conservation Area, drinking water catchment and local community are too great to allow this mine to proceed.

NCC is unsatisfied that the impacts of the mine can be managed and mitigated to ensure an acceptable level of environmental performance. Due to threats to water, biodiversity, threatened species, land, the community and the climate it is irresponsible to approve the Wallarah 2 mine and we urge the Planning Assessment Commission and NSW government to reject the proposal.

Mr O’Farrell gave a personal guarantee before the 2011 state election that, under his government, mining would not be permitted in drinking water catchments. The NSW government should act on that promise and reject this damaging proposal.

Thank you.

References


[3] OEH submission for the Wallarah 2 Coal Project (SSD_4974), (26/06/2013)