Submission to the Planning Assessment Commission P(AC) for its consideration in assessment of the Wallarah 2 Coal Project.

I object to the proposed coal project on the following grounds:

1. Risk assessment of the Coal Mine results in a rating of Critical Risk based on Almost certain Likelihood which could lead to Catastrophic Consequences.

The proponents admit that the project will have impacts and these impacts based on modelled information. If these predictions are incorrect, even by one order of magnitude, the consequences could be catastrophic. For example:

- Will lose 3,000 ML/yr of water. If this prediction is wrong, it will be too late to fix and the consequence on Wyong's water supply, the integrity of the aquifer, the surface water creeks, and socio economic (through the lost opportunities for future generations) will be catastrophic.
- Up to 1.4 m drop in groundwater level for local bores. All predictions of insignificant impact are based on models and model manipulations.
- Predictions of leakage from the alluvial sediments is justified based on a groundwater model calibration process. If the calculations in the recharge model proves to be wrong, this could have catastrophic consequence for water leakage and hence on water levels and supply. 2.5 ML/day of groundwater inflow is significant over 500 years.

2. Based on the precautionary principle - the level of uncertainty is extreme. For example:

- Proponents admit to having used models which were developed using projects which are significantly different than proposed. (Section 3.1.1 Subsidence Modelling p.6- of the proponent’s Response to Submissions). This mine will go to greater depths, extract at greater thickness, will be bounded by weaker strata, for which the overburden will consist of finer grained sandstones and shales than the Newcastle and southern Coalfields the models were built from. the Wyong Areas Coal Joint Venture (WACJV) has now reviewed the capabilities of their empirical and numerical models and developed a mechanistically modified empirical model
- Unknown behaviour of the Chain Pillars. I don't want to be part of an experiment to see whether a new mining technique works. If this new design approach doesn't work, it will cause significant, irreversible and long-term damage to the catchment where I live.
- Predictions as to how the Wyong Valley creeks will respond to longwall mining should not be based on the outwardly visible characteristics ('wide', 'ephemeral', 'steep slopes') of the creeks but on underground geology. Considering the unprecedented damage in the Southern Coalfield, a precautionary principle should prevail and longwall mining should not be allowed in drinking water catchments.
- It is not satisfactory to merely state that damage to Gosford Wyong Water Supply Scheme is 'extremely unlikely' (see section 3.1.5.) because they will have had more time to predict subsidence impacts by the time they get to Mardi and Mangrove pipelines.
- WACJV admit that there mine depth will be considerably greater than that of Newcastle Coalfield (see s. 3.1.10) and that there will be mining induced surface cracks in the steeply sloping upland areas; which is precisely where rainfall runoff is generated.
• The proponents admit there will be cracking within the Jilliby SCA but state that remediation is unlikely to be required in part because access is limited. This is totally unacceptable, human accessibility should not be a measure of remediation.

• Proponents admit to lack of baseline monitoring, this is simply unacceptable for a project of this size and potential impact.

3. Recent track records of mining in NSW are very poor. For example:

• Mt Sugarloof where there was extensive mine subsidence and damage to a State Conservation Area. Xstrata is a huge company and would have gone through a rigorous assessment process, eventually satisfying all concerned with their models and predicted impacts. If a similar mistake was made in Jilliby Creek, this would have catastrophic socio economic impacts on the Central Coast region, which is desperate for economic development.

• Significant damage to Sydney’s drinking water catchment from longwall mining.

• Camberwell Mine where large subsidence halted mining operation and if continues would devastate Glennies Creek.

• Significant water quality and quantity issues in the Hunter Valley caused by mining

4. Alternation of habitat following subsidence due to longwall mining has been listed as a key threatening process by the NSW Scientific Committee established under the Threatened Species Conservation Act.


• The evidence found by the committee includes discussion on the uncertainty and unpredictability associated with mining under rivers. Despite all the models to show little impact should occur during mining, adverse impacts have occurred to a number of threatened species and have significantly affected a number of riparian environments.

5. Serious probity issues regarding conduct of state government officials. The Nature Conservation Council, amongst others, have called on the Independent Commission Against Corruption (ICAC) to investigate potential corruption of between the proponents and NSW Ministers. The ICAC needs to conduct their investigation into the conduct of NSW Ministers; including Mr. Hartcher (the then Minister for Natural Resources), and Mr. Di Girolamo (a lobbyist for the Korean government owned company, Kores which 82% of shares in the Wyong Areas Coal Joint Venture) before final assessment of the Wallarah 2 project by PAC. Otherwise, we could see another Mount Penny and Doyles Creek fiasco where coal licences need to be cancelled following an ICAC investigation. Mr. Di Girolamo was also chief executive director of Australian Water Holdings, a company linked to the Obeid and Mount Penny mine scandal.

5. During the 2009 state election campaign, Mr. O’Farrell and Mr. Hartcher promised the Central Coast that the 'Next Liberal-National Government will ensure mining cannot occur here ... no ifs, no buts. A guarantee'.

6. The proposal was previously rejected, significant government (at tax payers' expense) and community expense and effort has now been spent on re-assessing basically the same proposal for which the proponent has tried to provide more rigorous assessment, based on
models and predictions. The judgement of the first assessment process should be honoured as the project is basically the same and the risks are the same. The only difference now is that the proponent has taken more time to develop new models, refine their old models and hypothesise on why they think the project should be permitted.