

[REDACTED]

22 November 2017

Ms Lynnelle Briggs AO
Chair
Planning Assessment Commission
pac@pac.nsw.gov.au

Dear Ms Briggs,

Rocky Hill Coal Project (SSD 5156)

Whilst I did give a presentation as part of the Manning Clean Water Action Group Inc delegation to the PAC hearing in Gloucester last week I would like to take this opportunity to make a personal submission regarding the Rocky Hill Coal Project ("the Project").

I fully support the Department of Planning & Environment's ("the Department") recommendation that the Project **be refused** however I am disappointed that the issue of the risks of pollution of the water catchment from the proposed Project is not included in the schedule of reasons for refusal given that, in the Department's Assessment Report ("the Report"), there is ample reference to such pollution risks to our water catchment.

Specifically, the Report raises serious concerns regarding the management of saline mine water generated from the Project:

- Gloucester Resources Limited has admitted that, "In the absence of site-specific water quality data it is impossible to provide other than a conceptual process and componentry design" for a treatment plant for saline mine waste water. As the Department points out in the Report: if the quality of mine water differs to that anticipated then it is possible that the water treatment plant could be rendered in operative due to fouling of filters or membranes.
- The Environmental Protection Authority (EPA) estimates that the water treatment plant would generate up to nine tonnes of brine each day. The EPA notes that not all waste depots would be suitable for these large volumes of brine.

These scenarios indicate that the Project poses a risk to the water quality in the Manning River catchment.

The Department's comments regarding the possible impact of the Project on the endangered Purvis' Turtle, Manning River Helmeted Turtle *Myuchelys Purvisi*, are also of concern. The Department states that "The amended project would have no possibility of affecting the water quality at most locations where Purvis' Turtle is known to be present." As I presented to the

PAC on 14.11.17 this statement is made on the basis of outdated and incomplete data and does not reflect the requirement of the Threatened Species Assessment Guidelines for a comprehensive on-site ecological study to be conducted of this endangered species.

The Department's reiteration of GRL's statement that "as all tributaries of the Manning River catchment are connected, it would be possible for this turtle to travel along these waterways to locations within the Gloucester River catchment" appears to ignore the fact that, whilst turtles may not travel widely, water flows quickly and any pollution would quickly impact on any turtles living downstream from the Project.

In conclusion the development application by Gloucester Resources Limited (SSD 5156) Rocky Hill Coal Project should be refused for the reasons given by the Department as well as on the basis that:

1. the project would have unacceptable risks to water quality;
2. the project would have unacceptable risks to the endangered turtle *Myuchelys Purvisi*.

