

7th December 2020

To the Independent Planning Commission

Submission opposing the DENDROBIUM EXTENSION PROJECT SSD8194

Dear Commissioners

It has long been documented the effects of longwall mining in damage to water courses and aquifers as far back as the 1990's. The critical report by the State's NSW Scientific Committee, authored by Dr. Leslie Hughes titled "Key Threatening Processes.....etc", reporting on the untold damage to the very same areas to be impacted by the current application. It would be folly for Commissioners to not regard this document as a guide to what can go wrong.

Following this year's widespread damage from bushfires in the same region it is folly to even consider risking damage and water loss from the critical areas covering the Dendrobium extension.

"Special Areas" within the Sydney water catchment are designated for one reason. They are special and very delicate.

This proposal is regarded by Dr. Peter Turner, of the National Parks Association, as the

"most significant in the history of mining in the Special Areas, because of the aggressive nature of the proposal, and recognition and government acceptance (of damage)".

We urge the IPCN to reject this proposal outright due to the risk of damage perceived by various experts.

Water is precious as are the water based natural systems that cannot exist without it. These delicate and vital systems must remain undisturbed.

The July 2008 Government "Impacts of Underground Coal Mining on Natural Features in the Southern Coalfield...Strategic Review" mentions two particular aspects of caution.

Precautionary Principle

Firstly. That the "precautionary principle" should be noted regarding approvals. The early "bibles" of mining procedure, authored by experts Drs. Holla and Barclay in particular, highlighted precautionary principle in terms that should significant risk be perceived, then mining should not proceed. "Risk", being the key word. Let's quote from page 5 of the 2008 document ;

"Due to the extent of current knowledge gaps, a precautionary approach should be applied to mining which MIGHT unacceptably impact highly significant natural features".

"Special Areas" must come under that umbrella of concern.

Reverse Onus of Proof

Secondly (from the 2008 document) , also on page 5, quotes:

“The approvals process should require a ‘ reverse onus of proof’ from the mining company before any mining is permitted which might unacceptably impact highly significant natural features”. This means “Special Areas” as previously designated.

The Dendrobium Extension Project simply goes too far in risking damage in the proclaimed “Special Areas”. The damage in the region over the last decades has been far too great. Any further risks would be out of proportion to the benefits realised.

We urge the Commission to seek out the NSW Scientific Committee’s paper authored by Dr.Leslie Hughes (“Key Threatening Processes.....”) , and the previously mentioned July 2008 document, and on the basis of what we know reject this proposal in full.

Yours faithfully

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