

Macarthur Branch

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Introduction

The National Parks Association of NSW is one of the state's peak environment groups and was established in 1957. NPA Macarthur Branch is the region's oldest established environment group, operating as a sub-branch of Sydney Branch since 1975 and as a full branch since 1987.

NPA Macarthur has a history of involvement with mining in the Special Areas which goes back 20 years –

- 2001 - participation in the COI for Dendrobium mine
- 2002 to end of 2015 – representation on Dendrobium CCC
- 2007 – participation in Southern Coalfield Inquiry (SCI)
- 2009 – participation in Metropolitan mine PAC
- 2010 - participation in Bulli Seam PAC
- 2015 – participation in Russell Vale PAC

... as well as countless submissions and published articles

Through the author's involvement with the Dendrobium CCC, we have had 10 years (2005-2015) of experience of observing first-hand the ongoing impacts of mining in the Metropolitan Special Area. Via independent inspections we have also seen the damage wrought by mining on Waratah Rivulet from 2006 onwards in the Woronora Special Area.

After all this time we feel nothing but frustration with the fact that the very obvious continuing damage to the catchments has not led to any meaningful change in government policy re mining in those areas.

We had great hopes for change with the SCI in 2007. Its recommendations, more than 10 years ago, were for many of the things – better monitoring, assessment of surface water flows and impacts, risk management etc. – that are still contentious. It was acknowledged then that so much was unknown, particularly about the hydrology of the catchments and so much more research was necessary ... and now we are still asking the same questions after 15 years of mining has continued to degrade the catchments and there is no end in sight – to the research, the inquiries or the mining.

It seems the wheels grind very slowly, particularly as economics get in the way where mining is involved. We were thrilled with the 2010 Bulli Seam PAC conclusion –

The Panel is of the view that it is no longer a viable proposition for mining to cause more than negligible damage to pristine or near-pristine waterways in drinking water catchments or where these waterways are elements of significant conservation areas or significant river systems.

This level of damage would not be acceptable in any other assessment of water resource use

The analysis reported in Chapter 17 shows that the benefits of protecting significant natural features in the eastern and southern areas are likely to be of a similar magnitude to the mining profits that would have to be given up to ensure that protection. So while protection of the significant natural features would involve lower mine profitability, it is likely that society as a whole would gain more from the environmental protection recommended than it would lose in terms of foregone profits.

This landmark statement resulted in BHP withdrawing the proposal's entire eastern and southern domains, encompassing the headwaters of the Georges River. Most of this area, outside of drinking water catchments, subsequently was declared the Dharawal National Park in 2012.

Despite our euphoria with this result, we always had an ominous feeling of foreboding that it would result in a trade-off with BHP and this indeed came to pass in 2013 with the approval of the Dendrobium 3Ba area - albeit only the first 5 longwalls to begin with. All the reasons given for this appalling decision in the most sensitive area of the catchment, were economic .

Now we are faced with a similar appalling proposal, one which we are sure the original commissioners, who gave a tentative, staged approval for this mine back in 2001, would never have thought possible.

Emplacement Area

The full range of impacts due to longwall mining in the catchments was illustrated by NPA Macarthur at the recent hearing. An off-catchment impact that is little-known or understood in this area, however, is the emplacement, or dumping of coal waste/coal wash/coal reject material.

Since the 1970s when mining first started at Westcliff, near Appin, coal waste has been dumped in the Brennans Ck valley, a convenient site adjacent to the mine pit top. Brennans Ck was a major tributary creek of the upper Georges River. Brennans Ck dam was also built in that era to treat run-off water from the coal stockpiles and pit top surface and also run-off and leachate from the emplacement area.

It wasn't until Dendrobium started production in 2005 that emplacement here went into overdrive. Mining the Wongawilli seam at Dendrobium involves a lot of rock being excavated along with the coal and there was no provision in the 2001 approval for any emplacement on the mine site. A convenient solution was to truck that waste material up to Westcliff, the same trucks then returning with coal to the port. Up until at least 2011, more than 50 percent of what was emplaced at Westcliff was from Dendrobium, due to the large volume of rock being pulled out with the coal.

With the Dendrobium approval, the emplacement area was expanded into 4 stages. The creek flow was channelised high up on one side of the V-shaped valley of Brennans Ck, the valley floor and sides were cleared of vegetation and sculpted to maximise the fill area, and aboriginal sites in overhangs were recorded and then covered in plastic, ready to be entombed.





Until 2011 dumping coal waste attracted no government fees, unlike the hefty fees payable by councils for household waste tips. In 2011, however, the state government brought in legislation which placed a levy on any coal waste emplaced off the mine lease site. This applied to Dendrobium, so BHP miraculously discovered numerous uses for the product in the Illawarra which vastly reduced, for a time, the amount needing to be dumped. We hear that this amount has increased again though, in recent times.

The extension of Dendrobium into Areas 5 and 6 will see the need for Stage 4. This area is largely untouched bushland, not in the creek valley but on flatter land above the dam, which means that the emplacement mound there will be highly visible, especially as a max. height of 360AHD is being proposed. That is 60m higher than the adjacent ridgeline.



Much more effort needs to be made to develop beneficial re-use of this material. This needs to be conditioned, as it has been previously but more than just a research project is called for. A heftier levy or a quantified reduction of dumped material over a specified period would put the onus on the company to be more proactive and creative in this matter.

Another environmental cost of this activity is the impact on the receiving waters of the upper Georges R. from the dam discharge. This has been problematic for many years, with a highly saline plume being traceable for 15 kms downstream. Since a new EPL in 2012, Sth 32 is only now considering a reverse osmosis plant to finally deal with this issue.

Swamp Impacts

It is somewhat ironic that the DPIE's Assessment Report has a cover picture of a healthy upland swamp, when they are recommending approval of a project which will very likely destroy all 46 such swamps in Areas 5 and 6.

It was very disappointing to hear Howard Reed from DPIE answer a question at the end of the hearings about the impacts of fire on swamps. He is quite wrong to assert that the upland swamps of the Illawarra Plateau would fare any differently from those on the Newnes Plateau if they were burnt.

Any swamp which has completely dried out due to undermining has the potential for its vegetation to burn right down into the root zone, beyond the point of recovery. Even though the Illawarra Plateau swamps may not be solid peat-based, they have high levels of peaty, organic material in their sediments which will readily burn, once de-watered.

It has been sheer luck which has not seen this premise tested. Since the aggressive longwall mining that has characterised the Dendrobium and Metropolitan operations over the last 15 years there have been no wildfires across the catchments. The last one was in the summer of 2001-2. The fires of last summer were stopped on the western edge of the Special Area at the Freeway, otherwise we feel sure we would have witnessed the devastation of swamps, just as occurred in the Newnes area.

There are, however, earlier well-documented examples in the southern coalfield of swamp collapse following undermining and subsequent fire. These are Swamp 18 on Native Dog Ck above the old Elouera workings and Flat Rock Swamp on Waratah Rivulet above the Metropolitan Mine. Both were badly affected by the 2001-2 fire.

Interestingly, the many large swamps in Dendrobium Area 3B were also badly burnt in 2001-2 but regenerated quickly and have shown no ill-effects. There was certainly no mention of fire damage in the SMP for mining in Area 3B. Sadly though, now, after they have almost all been completely undermined, it would be a different story if they were to burn.

So despite Mr Reed's suggestion that our swamps will not be badly affected by fire, they are all to be offset anyway!

Conclusion

We are heartened that the IPC has heeded our plea for them to see for themselves past mining impacts in the catchment and have committed to a site tour with WaterNSW.

We are strongly opposed to the extension of this mine, especially as it would seem that Sth 32 have abundant other resources for Bulli Seam coal outside the catchment. They are currently exploring an area NW of their approved Bulli Seam operation, which includes under my property. I have always said that I'd rather be undermined than see the Special Area undermined.

We maintain that this proposal has no social licence – it doesn't pass the "pub test". Having presented extensively all over greater Sydney and Illawarra showing the impacts of mining in the catchment, just as we did at the hearing, we know that people are shocked, even disbelieving, that the government would allow it and extremely angered to learn that the damage is sanctioned.

This not what people want or expect in their drinking water catchments. It is not what they want or expect to be allowed in any natural area. If the damage to a waterway such as Waratah Rivulet or WC21 could be seen by the public driving over a bridge every day, there would be an outcry, but this insidious damage goes on "behind closed doors", largely unheard of.

To approve this mine extension would be a most cavalier disregard of the precautionary principle. To approve, in full knowledge of the predicted impacts - and also with the alarm bells ringing re climate change, water security for an increased population, doubts about the future scenario of ever being able to seal the mine etc. – would be an act akin to madness, given all that we know ... and don't know.

Julie Sheppard

Secretary

15.12.20