



24th August 2007

Wyong Strategic Inquiry Panel Secretariat
c/- Department of Planning
GPO Box 39
Sydney NSW 2001

Submission - Strategic inquiry into potential coal mining impacts in the Wyong LGA

The Total Environment Centre (TEC) asks that the Department of Planning accept this late submission to the Independent Expert Panel for the Inquiry into potential coal mining in the Wyong LGA. The TEC supports the position and larger submission of the Australian Coal Alliance (ACA) in opposing a longwall mine under the Central Coast water supply catchment.

A new coal mine will cause significant subsidence damage to Jilliby Jilliby Creek, and has a very strong probability of fracturing the riverbed of the Wyong River. We also believe the project poses an unacceptable risk to the underground aquifers of the Yarramalong and Dooralong valleys. Numerous aquatic ecosystems from the affected valleys downstream to the Tuggerah Lakes, including the habitat of migratory bird species, will also suffer impacts should coal mining take place in the area.

The recent drought has also highlighted the increasing importance of the Yarramalong and Dooralong valleys to the Central Coast's water supply, with both valleys yielding approximately 50% of the region's water. The Central Coast has one of the fastest rates of population growth in Australia and the larger Mangrove Creek Dam has recently been a poor performer in terms of water yield.

The proposal also has the potential for negative social and economic impacts upon the local community and business in terms of direct impacts upon water supply, flood conditions and health. Climate change impacts from the mining of 5 million tpa of coal will also flow on to the NSW community and beyond.

Environment groups have recommended that the NSW Government impose a moratorium on new coal-fired power stations and new coal mines. The TEC opposes the Kores proposal in Wyong on this basis alone. However, any longwall mine should, at a minimum, avoid the impacts of subsidence on rivers and creeks over remediation. Mandatory buffer zones to protect the Wyong River, Jilliby Jilliby Creek and aquifers in the Dooralong and Yarramalong valleys should be enforced.

Longwall mining under rivers in Sydney's southern supply catchments has damaged numerous rivers, creeks and swamps. Known impacts have included fractured riverbeds, dewatering of rivers and recharge swamps, various pollutants entering the water supply, changes to the chemical structure of the water and changes to aquatic ecosystems.

Numerous NSW Government reports and the recent submission by the Sydney Catchment Authority (SCA) to the Southern Coalfield Inquiry all point to a lack of data making the extent of water loss to the catchments as yet unknown and undetermined. The problem, however, has been serious enough for the Hawkesbury-Nepean River Management Forum in 2004 to call for impacts to be "eliminated" from the catchment and for the SCA to embark on an extensive scientific study.

The area where mining is proposed to occur falls within the Wyong Water Supply Catchment District as proclaimed under the Local Government Act (1919). The recent history of subsidence damage to rivers across the NSW coalfields suggests that the Wyong mine proposal cannot meet the protective statutes for catchments contained within the Local Government Act.

The longwall layout in the Wyong proposal shows that total extraction would take place under Jilliby Jilliby Creek and future panels coming well within 100m of the Wyong River in a number of places. Combined with the design of the longwall panels, the proximity to Wyong River, the highly significant role of underground aquifers in recharging flow in the Jilliby Jilliby Creek catchment and the length of the creek proposed to be undermined, the current lack of scientific data on water loss due to longwall mining makes it impossible to predict the scale of damage to the Central coast's water supply.

Our recommendations are made below.

David Burgess
Natural Areas Campaigner
TEC

Key TEC recommendations on longwall mining in the Wyong LGA:

1. **The TEC believes that, given the history of environmental damage in other NSW coalfields, it is not possible to conclude that catchment values of the Central Coast will not suffer as a result of longwall mining.** The significance and the extent of this damage are also impossible to quantify. On the basis of recent history and in the absence of such data, approval of the Wyong coal proposal would represent a serious and reckless departure from the precautionary approach and other principles outlined in the Ecologically Sustainable Development framework.

2. Coal is the most greenhouse polluting form of electricity generation. Any new coal mine or power station 'locks-in' emissions for the lifetime of the project - in this case 40 years. The Wyong proposal is part of a continuing coal industry expansion that will make the meeting of NSW emissions targets impossible. Any expansion of the industry puts the environment, investment in future technologies and future jobs in the renewables sector at risk. **The Wyong proposal will have a negative impact on the ability of NSW to meet emissions targets and should not be approved.**

The TEC opposes the establishment of a new coal mine in the Wyong LGA. However, any longwall mine operating in the lease area should abide by the following conditions:

1. A 1km protection zone should be enforced around rivers and streams underlain by proposed longwall mining in the Wyong LGA and Central Coast water supply catchment. **A 1km protection zone should be established around the Wyong River and Jilliby Jilliby Creek.**

2. A strong **onus of proof must be placed on Kores** to ensure that underground aquifers in the Yarramalong and Dooralong Valleys are not damaged by longwall mining subsidence. If this proof cannot be provided, mining should not take place near these aquifers, which provide most of the recharge water to streams within these valleys and the supply catchment.

3. The long-term economic value of the parts of the Central Coast water supply that stand to be affected by the Wyong mine proposal should be stated. **An estimate of the social and economic costs of potential damage to the catchment, leakages and loss of flow must also be made with various scenarios of water loss**, including a 50% loss scenario based on the history of damage to the Lower Cataract River.