



NATIONAL PARKS ASSOCIATION OF NSW
protecting nature through community action

Macarthur Branch
P.O.Box 792
Campbelltown 2560

The Manager Illawarra,
Environment Protection Authority,
epa.illawarra@epa.nsw.gov.au

Dear Sir/Madam,

RE: BHP APPLICATION TO VARY EPL 2504

We thank you for the opportunity to comment on this application and for the efforts you have made to involve and communicate with interested community groups.

NPA Macarthur, which was formed in 1975, has dealt with the issue of this mine's discharge polluting the Georges River for well over 25 years. At times the river has run grey/black after heavy rain all the way to Ingleburn, due to overflows from Brennans Ck dam, prompting sometimes front page news in the local papers .



Macarthur Chronicle 1.12.87



It's war against river pollution

By JEFF MCGILL

A SPECIAL "pollution-busters" committee — determined to prevent the Georges River being tamed into a foul sewer — is set to be created in the next month.

The ambitious proposal follows one of the river's worst-yet pollution scares, when a mysterious grey-black sludge stained the length of the river between Airds and Appin over Christmas.

Macarthur branch members of the National Parks Association (NPA) claim they traced the stain upstream as far as

Berrans Creek Dam near Appin, owned by West Cliff Colliery.

The Advertiser made repeated attempts to contact the coal mine's management, but it was either unavailable or failed to return our phone calls.

Local environmentalists fear the scenic waterway is slowly dying.

The NPA now hopes to join Campbelltown Council in taking active steps to form a "river-watch" committee. Spearheading the plan is NPA branch

president, Verlie Fowler, and former local ranger, Keith Langhurst. Both will meet the Mayor, Alderman Gordon Petryplac, this week to discuss the issue.

Mayor Petryplac told the Advertiser he too was concerned at the serious nature of the issue and was keen to discuss options with the NPA.

Mrs Fowler said she hoped the proposed committee would keep an active eye on the river, conduct regular water quality tests, publish the findings and, if possible, identify the source of any pollution.

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VERLIE Fowler and Keith Langhurst at the Woolwash.



A PHOTOGRAPH taken by the NPA at Christmas, showing the polluted water of the narrow Georges River flowing into the wider and unpolluted Georges Creek at The Woolwash.

Macarthur Advertiser 29.1.92



On 11.8.07, this is how the river looked at Jutts Crossing at least 6 weeks after heavy rains in June.

These incidents show obvious pollution which is visible. What has been highlighted by Dr Wright's work, however, is insidious ongoing water pollution that is not obvious to anyone looking at the river but which must be impacting on the river's biota – ie. all living organisms that depend upon its waters. Dr Wright has detected a plume of pollution which extends all the way to The Woolwash, some 13-15kms downstream.

Despite the problem existing for so long and despite the many Pollution Reduction Programs put in place over the years to tinker with the issues, we still see today this substantial pollution of the river continuing and this application will merely perpetuate this. This is totally unacceptable.

It is unacceptable because there are alternatives to continuing to use the Georges River as a drain; alternatives which BHP is using elsewhere. Some years ago it was thought unacceptable to continue the highly saline discharge from the Appin West mine to the Nepean River from Allens Ck so a reverse osmosis desalination plant was installed.

Also the discharge from BHP's Dendrobium mine is not into a local stream but into the ocean at Port Kembla at the same Licensed Discharge Point as the brine for the Appin West desal. plant.

Mine water could be re-injected back into old workings, leaving only treated surface water to maintain an environmental flow in Brennans Ck. Perhaps it could even be piped to the new sewage treatment plant at Appin or to Liverpool.

Some comments on the application's supporting material

In our view it is highly biased, heavy on opinion and short on science.

It measures water quality by conductivity (p.8) showing that BHP regards the environment as a physical model rather than a living biosphere.

BHP chooses to refer to water quality for agricultural purposes like sheep etc, but completely ignores the needs of native fauna although much of the water below Brennans Ck Dam passes through or by National Park or proposed National park/conservation areas.

The company proposes that 90% species protection (ie.10% species loss) is acceptable in the waterway.(p.15) This is unacceptable to NPA.

pH is a major issue. BHP and their consultants either do not understand the important significance of pH or choose to ignore it. It can be seen with plants. Sandstone landscapes usually have acid waters (pH usually between 5 and 7). The flora in these are characteristic of the area and many of the plants will not grow in alkaline landscapes, and conversely alkaline landscapes have their own floristic mix.

No real study has been done to show that water dependent organisms other than a few chosen species tested in a lab are impacted by this discharge.

Alkaline water can leach minerals from the waterways that would normally not be soluble.

Salinity is high but during dry spells, in isolated pools the salt will be concentrated to much higher levels.

Conclusion

Whilst we have not had the time to analyse the science, we do, however, respect the work of Dr Wright who has no vested interest in this matter. When we have the experts disagreeing on whether the polluted discharge is actually having a detrimental impact on the river's biota, we believe the precautionary principle should be invoked. Measures should therefore be adopted which assume that Dr Wright's analyses could be correct.

NPA Macarthur will not accept anything less than a licence which allows a discharge to Brennans Ck from this mine which mimics unpolluted reference streams. We will no longer accept a licence to pollute.

We know that BHP can do better than this if they have to. It's time that this sorry state of affairs was cleaned up once and for all and the balance was tipped in favour of the environment in regard to the Georges River, which has already suffered so much from the impacts of this mine.

We are losing the entire Brennans Ck valley to the appallingly wasteful coalwash dump (emplacement). Our local environment has been sacrificed enough for this mine; we should be able to reclaim our river, whatever it takes.

Yours faithfully,

Julie Sheppard

Executive committee
NPA Macarthur Branch

25.10.12