

Submission regarding Draft POEO (HRSTS) Amendment Regulation

Online: <http://www.epa.nsw.gov.au/licensing/hrsts/regreview.htm>

Thank you for the opportunity to comment on the draft regulation.

## **Background**

The Hunter Salinity Trading Scheme (HRSTS) has been in operation for over 10 years to control mine water discharge and rising salinity levels in the Hunter River.

The HRSTS was a vast improvement on the previous arrangements when mines discharged unrestricted volumes of polluted water whenever they wanted.

The mining industry has expanded substantially during the implementation of the HRSTS. The rules need to be tightened to further regulate mine water discharge.

Good water quality is vital to the health of the river system and to other user groups eg wine & dairy industries

There has been no cumulative impact study conducted of the long term impacts of multiple large open cut and underground mining operations in the region on the Hunter River system.

## **Submission**

1. Whilst we see the raising of the current flood flow thresholds as a positive move in in a good direction to endeavour to protect (or lessen the damage to) the Hunter river, we do not support the retention of the flood flow exemption that allows all mines to discharge uncontrolled volumes of polluted mine water. Clause 26 should be removed from the regulation. All references to high flows and flood flows should be removed. All mine discharge should be conducted using credits under the trading scheme.
2. The proposed ongoing expansion of coal mining activities west of Muswellbrook in the upper sector of the Hunter River will put additional cumulative pressure on river health and we therefore support no discharge into low flows.
3. Clause 84 should be extended to allow broader use of auction and sales proceeds. Additional proceeds from salinity credit auctions and sales should be available for funding necessary research and monitoring in the Hunter catchment.

Sincerely  
Alan and Judith Leslie

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