



# Hunter Environment Lobby Inc.

POEO (HRSTS) Regulation Review  
Reform and Compliance Branch  
Environment Protection Authority

██████████  
████████████████████

Monday 8 February 2015

## **SUBMISSION**

### **Draft Protection of Environment Operations (Hunter Salinity Trading Scheme) Amendment Regulation 2016**

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has had a long interest in the environmental health of the Hunter River system and held a position on the Hunter River Management Committee during the development of the water sharing plan for the Hunter Regulated River Water Source.

HEL is of the opinion that water quality is a significant issue for river health in the Hunter Region and welcomes the opportunity to comment on the draft amendment regulation for the Hunter River Salinity Trading Scheme (HRSTS).

We have noted the HRSTS review report and appreciate the attention given to the issues raised in our previous submission.

HEL is concerned that the large proposed greenfield mines and mine expansions to the west of the Hunter River, particularly within the Goulburn River tributary (eg Bylong Mine) and in the upper sector (eg Muswellbrook West, Dartbrook open-cut, Mt Pleasant) will place additional pressures on the river system and cause further degradation of river health.

We also note that many mines such as Mangoola were approved with a condition of nil discharge, only to have that condition overturned in subsequent modifications. HEL is concerned that there has been no rigorous assessment of cumulative impact of mining on the Hunter River system.

The Hunter bioregional assessment conducted by the Independent Expert Scientific Committee has not yet conducted the cumulative impact assessment, as part of this process.

Within this context we consider that the flood flow exemption is inappropriate and all mine discharge should be conducted under the salinity trading scheme. We support the retention of the rule that no discharge occur in low flow blocks. The high flow and flood flow blocks should be removed so that all discharges are conducted using salinity credits.

HEL considers that proceeds from credit auctions and sales should be available to fund urgent research and improved catchment monitoring. Clause 84 should be rewritten to allow for this extended use of funds.

Yours sincerely



Jan Davis  
President