

Draft Amendment to Hunter Salinity Trading Scheme

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

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.

Mine water discharge often contains potentially soil-damaging contaminants such as heavy metals. It is also simplistic to assume that, in times of flood when contaminants are more diluted, this should trigger a mine's ability to discharge more water.

The dilution factor only lasts until the contaminants are incorporated into soils and the extra diluent water evaporates.

Hunter soils already have significant salinity problems.

The health of the river system and capability of other user groups (e.g. wine & dairy industries) is very dependent on good water quality.

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

I therefore submit;

The proposed ongoing expansion of coal mining activities west of Muswellbrook in the upper sector of the Hunter River will continue to put additional cumulative pressure on river health and, by so doing, jeopardise other industries dependent upon soil and water health..

I 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. As outlined above it is both unscientific and arrantly foolish to assume dilution in times of flood makes the water contaminants any less dangerous to ongoing soil and water security

I support an absolute prohibition on discharge into low flows.

I support a system where additional proceeds from salinity credit auctions and sales should be available for funding necessary research and monitoring in the Hunter catchment. Clause 84 should be extended to allow broader use of auction and sales proceeds.

I request my submission points be considered.

Judith Leslie

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