



PO BOX 120 BROKE NSW 2330
PH 0408 234773
exec@huntervalleyprotectionalliance.com

3rd February, 2014.

The Director,
HRSTS Review,
Reform and Compliance Branch,
NSW Environment Protection Authority,
PO Box A290,
SYDNEY SOUTH NSW 1232

HRSTS.Review@epa.nsw.gov.au

Dear Sir,

RE: Review of the Protection of the Environment Operations (Hunter River Salinity Trading Scheme) Regulation 2002 – Discussion paper.

We have taken the opportunity of perusing the above Discussion paper and would like to make the following comments and ask that you take them into account in your Review:

1. We would support the view that the salinity targets for the scheme be not raised above the current 600 μ S/cm at Denman and the 900 μ S/cm at the confluence of Glennies Creek and at Singleton.
Nothing has changed since the inception of those targets which were agreed between all stakeholders.
Indeed the Discussion paper refers to scientific evidence suggesting that the salinity targets should not be raised. It is always dangerous to ignore scientific evidence when it comes to the protection of the environment.
The Trading Scheme has clearly been successful to date and there is no justification to alter the targets.

There is indeed support within the Discussion paper to decrease the upper end of the target zone from 900 μ S/cm to 800 μ S/cm.

This support is firstly by way of the Australian Drinking Water Guidelines which sets out that water of good quality is 80 to 500 μ S/cm and water of fair quality is 500 to 800 μ S/cm.

Accordingly the 800 μ S/cm upper limit would ensure that salt levels aren't elevated to the stage where water becomes unpalatable for humans and stock, reduces agricultural yields, accelerates corrosion of domestic and industrial pipework and appliances, and causes negative effects on aquatic ecosystems.

Secondly, it is noted in the Discussion paper that whilst macroinvertebrate "health" is on average good, there are some areas where this is quite poor and salinity appears to be a relatively important factor.

This again supports a reduction in the 900 μ S/cm upper limit to 800. This also keeps it within World Health Organisation standards which sets a maximum of 800 for drinking water.

Committee:

Eden Anthony, Commodore Chris Elsmore RAN Rtd., Stewart Ewen OAM, Adrian Garton, Graeme Gibson Dip. Law, Roger Goldfinch, Tom Jackson, Elizabeth Johnstone; Graeme O'Brien BA, M Ed Stud., Richard Owens AM, Alan Stevns, George Taskal, Hugh Upward.

2. We support the removal of the flood flow exemption to ensure that salinity credits are needed for all mine discharges, however we do not support the changing of the definition of a "high flow" event so that a discharge event can be triggered at a lower flow.

We are concerned that as the coal mines increase in size and as new coal mines come on-line, that there will be pressure on the Scheme.

This pressure on the scheme will be added to as it is likely that if Coal Seam Methane Gas extraction is commenced in the Hunter Catchment that the CSG miners will seek to be included in the Salinity Trading Scheme. CSG mining would, as has been shown in Queensland and other parts of the world, generate millions of litres of saline water of varying strengths.

There must be no temptation to increase the current targets to accommodate CSG mining "produced" water.

The CSG "produced" water is a major concern in the catchment as, at this stage, there has been no plan formulated by the CSG miners for the disposal of that water other than the current trial by AGL Energy to spray saline water over pasture in the Gloucester area.

3. We support increased public transparency and access to information including when and where discharges occur, all available water data and the results of investigations into the health of the Hunter River system.

We believe that this public transparency should not simply be an availability for the public to access the information if they go looking for it on-line at the EPA or other website, but the information should be published in local media, newspapers and radio, so that irrigators and town water providers are well aware of the health of the water being used for irrigation or for drinking.

4. In view of the current CSG activity in the Broke and Bulga areas adjacent to the Wollombi Brook, which is in addition to those coal mines currently operating close to the Brook, it is submitted that there be regular and frequent assessment of the salt levels in the Wollombi Brook from Paynes Crossing through to Warkworth.
5. Any additional revenue generated by way of salinity credit auctions should be used for the purpose of ensuring the health of the Hunter River and its tributaries by establishing groundwater monitoring programs, and also to research and identify all other contaminants other than salt, which enter into the River system from coal mining, CSG mining or agriculture generally.

Thank you for the opportunity to have input into the Review.

Yours faithfully,

Committee:

Eden Anthony, Commodore Chris Elsmore RAN Rtd., Stewart Ewen OAM, Adrian Garton, Graeme Gibson Dip. Law, Roger Goldfinch, Tom Jackson, Elizabeth Johnstone; Graeme O'Brien BA, M Ed Stud., Richard Owens AM, Alan Stevens, George Tlaskal, Hugh Upward.

HUNTER VALLEY **PROTECTION ALLIANCE**

PO BOX 120 BROKE NSW 2330

PH 0408 234773

exec@huntervalleyprotectionalliance.com

Stewart Ewen. OAM

Chair.

Hunter Valley Protection Alliance Inc.

Committee:

Eden Anthony, Commodore Chris Elsmore RAN Rtd., Stewart Ewen OAM, Adrian Garton, Graeme Gibson Dip. Law, Roger Goldfinch, Tom Jackson, Elizabeth Johnstone, Graeme O'Brien BA, M Ed Stud., Richard Owens AM, Alan Stevens, George Tlaskal, Hugh Upward.