

Rev Smiles

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

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Submission to Review of Hunter River Salinity Trading Scheme Regulation

I am a landholder with basic rights in the upper Goulburn River catchment and wish to submit the following comments on the review of the regulation operating the Hunter River Salinity Trading Scheme (HRSTS).

The discussion paper developed by Environment Protection Authority (EPA) includes a particular focus on the Goulburn River salinity levels and issues relating to the management of expanding coal mining and possible development of coal seam gas in the catchment.

The Goulburn River, the most westerly rising tributary in the Hunter catchment, has extremely variable flows because climatic influences are more from the central west weather patterns with some coastal overlay.

The Salinity Assessment of the Hunter catchment carried out by Office of Environment and Heritage (OEH) has identified the concerning problem of limited water flow and salinity monitoring in the upper Goulburn River catchment.

The three large existing mines at the headwaters of the Goulburn catchment, Ulan, Moolarben and Wilpinjong, are all currently expanding with a major influence on the hydrology of the catchment.

There has been no independent regional water study done on the upper Goulburn River, although the community has been continually calling for this to occur since 1998.

Moolarben Stage 2 proposal and Wilpinjong modification 5 are currently before the Planning and Assessment Commission (PAC). None of the issues relating to water quality management in the Goulburn River, as raised in the EPA discussion paper and the OEH salinity assessment report, have been addressed in the documents sent to the PAC.

The EPA discussion paper identifies that more investigation and analysis of the issue is needed to determine how best to manage inputs of salt from mines in the Goulburn River subcatchment.

There is limited knowledge on discharge opportunities and limits for Goulburn River mines; potential impacts on other water users, HRSTS participants and environmental health; the extent to which current mine discharges limit the ability of Hunter participants to discharge under

HRSTS and the impact of any expansion of mining and gas in the Goulburn River on the operation of HRSTS.

These are major economic, social and environmental considerations that have not been included in any current assessment of mine expansion in the Goulburn River catchment.

The discussion paper and OEH report also raise the issue of monitoring for other pollutants in mine discharge water besides electrical conductivity and total dissolved solids. The ionic composition of salinity and the possible presence of metals/metalloids in mine discharge water are of great concern as a downstream water user.

The fact that there has been very little investigation into these contaminants when the mining industry is continuing to expand in the Hunter catchment is a major problem. It appears that any research of these pollutants in mine discharge water has found levels of some pollutants above the guidelines for aquatic health. The issue of accumulation of heavy metal contamination of water sources in the region has not been addressed anywhere.

The management of mine discharge in the Goulburn River to date has been very disturbing. After a major flood event in late 2010, the EPA turned off the discharge licence conditions and allowed the three mines to discharge mine water into the Goulburn River system for a period of three months, well after the diluting high flows had ceased.

The discussion paper confirms my concerns that there is little or no knowledge of how the Goulburn River system functions, there is no real time monitoring of flow and water quality and the major long-term impacts of large scale mining operations in the catchment are not being adequately assessed.

The disturbance of longwall and opencut mining operations across more than 300 km² of the headwaters of the Goulburn River catchment is a major cumulative impact with considerable economic, social and environmental implications for downstream water users.

The ability of the HRSTS to continue to function adequately, in the context of ongoing major coal mine expansion in the Hunter region, is an important issue for the NSW Government, the mining industry and the community.

I support the EPA position to not raise the salinity targets at Denman, confluence of Glennies Creek and Singleton.

I also propose that any additional revenue raised by the HRSTS salinity credit auctions be invested in a Hunter catchment comprehensive and representative ground water monitoring program and strategic real-time monitoring of flow and salinity in the upper Goulburn River catchment.

Yours sincerely

A grey rectangular box redacting the signature of Bev Smiles.

Bev Smiles