



Sydney Catchment Authority
Healthy Catchment Strategy
HCSconsultation@sca.nsw.gov.au

5.3.10

Dear Sir/Madam,

RE: Draft Healthy Catchment Strategy

Rivers SOS notes the references to mining impacts in this Draft Strategy. We appreciate the difficulty faced by the SCA in carrying out its duties to protect the catchments whilst at the same time having to “manage” longwall coal mining impacts. (We noted with alarm at the Southern Coalfield Inquiry in 2007 that the SCA expected that “up to 91%” of the Special Areas would ultimately be mined given current leases. This figure will undoubtedly increase as we are aware more exploration leases are being offered by the Government.)

This difficulty is most pronounced in the Woronora and Metropolitan Special Areas. As we have first-hand knowledge of the damage being wrought in these Special Areas, especially to upland swamps, we wonder how the SCA can possibly achieve the stated targets of the NSW Natural Resource Commission, listed on p.53 of the draft document. This especially applies to Target numbers 5-8 and when we consider upland swamps, particularly to Target #8 – *By 2015 there is an improvement in the condition of important wetlands, and the extent of those wetlands is maintained.*

We also note in a related current management document, the SCA’s Special Areas Strategic Plan of Management (SASPoM), 2007, the admirable and necessary Actions 5.2 and 5.4 which are intended *to promote the protection of Special Areas values to government decision makers.* (The implication is here in this very wording that the SCA and presumably its Minister are not included amongst the decision makers.) The current crop of decision makers seem to be happy to encourage longwall coal mining which will continue to degrade vast areas of the Special Areas through surface infrastructure works, cliff collapses, widespread ground fissures, streambed cracking, diversion of surface water flow and contamination of water, particularly with iron. Worst of all is the cracking of the bedrock beneath upland swamps leading to their desiccation, their vulnerability to fire and erosion and ultimately their total collapse, for which there is no known and proven remediation strategy.

We have actually been told by D. Kitto of the Dept of Planning that the only reason they would require a change of mine plan to avoid a swamp would be if it could be proved that undermining was causing a loss of water to the storage, in this case, L. Cordeaux. (Dendrobium CCC meeting 16.4.09) This was accompanied by the admission that there was very little baseline data on flow measurements within the area to even establish the significance of the swamps in delivering water to the storage!

Rivers SOS is an alliance of over 40 groups committed to the protection of the integrity of river systems and water sources against the impacts of mining.

Thus BHP are pursuing their approved mine plan in Dendrobium Area 3A, which will undermine 3 large upland swamps, whilst we witness the failure of the first undermined swamp (Swamp1, Area 2) which was cracked and drained, to recharge even after 200+mm of recent rainfall.

So the Government decision makers obviously have no regard for the eco-system integrity of the catchments. They seem only concerned with the simplistic notion of water flowing into the dams immediately after rain. Thus the stated management goal and 30 year vision of the SCA which is to *conserve ecosystem integrity, natural and cultural values* whilst at the same time providing *high quality raw water* to the reservoirs (SASPoM 2007) is in conflict with the demonstrated goal of the Government which appears to be to maximise the extraction of the coal resource.

So unless the SCA can quickly convince the decision makers in Government of the ecological values of the Special Areas, (and particularly their key components, the upland swamps) then much irreparable damage will occur before someone in a position of power finally realises what is happening.

We also note in the Draft Strategy that the aim is to rehabilitate all priority derelict mine sites by 2012. This is within 2 years, so we wonder what sites are being referred to here. (How many sites? Where are they located?) We are aware that there are many derelict mine sites within the SCA's catchments and we're also very aware of the problems these pose, such as acid mine drainage, so we strongly endorse progressive rehabilitation of these sites. Our concern, however is that a continuation and a greater intensity of mining in the catchments is leaving a legacy of damage that will be beyond repair or "rehabilitation" in the future. (How do you put back a fallen cliff or a collapsed rockbar? How do you repair a collapsed swamp?)

In conclusion, it is all very well to produce glossy documents such as this, promoting Healthy Catchments, but the SCA seems powerless to achieve their stated aims, particularly in the Special Areas, in the face of increasingly intensive longwall being encouraged by other arms of Government. Because of this, Rivers SOS and other environment groups will continue to highlight these issues in the media and to lobby Government. We know that people are genuinely shocked when they see evidence of mining damage in the Special Areas, such as at Waratah Rivulet and Dendrobium. They are even sometimes initially disbelieving, thinking that the Government would not be letting that happen. Then they become very angry in the knowledge that it is happening and mines are continuing to be approved despite predictions of further damage.

The general public expect that the Special Areas will be managed for water supply, first and foremost; they do not expect that the Government will allow these areas to be systematically degraded by mining.

Yours faithfully,
Julie Sheppard
Secretary