

Wellington Council operates the Phosphate Mine as a tourism operation and for no other purpose. For over 10 years Council has made substantial losses at its Wellington Caves tourist operations. It continues with these tourism activities to assist the economic development of the LGA. The mine like much of the surrounding country is karst with a solid framework of limestone surrounded by clays. Infrequently and after much rain some clay washes in to the mine through cracks and fissures requiring some clear out. However, the limestone framework has been shown to be very solid and the mine at its deepest has a few metres of clay above the karst and has been shown to be very stable.

That said, safety is very much the focus of operations at Wellington Caves and we are supportive of any regulation review that addresses necessary changes for that purpose. Staff are well trained, the operations are innovative in terms of improvements to safety for our visitors, and Council's support with a range of safety processes and measures is excellent. There is a range of ongoing scientific research in a number of areas being conducted by universities such as the University of NSW and Sydney University. We also have a scientific Advisory Committee with some leading scientists providing technical support to operations at the site.

At the strategic level, I was concerned that the previous distinction between tourist and operating mines appears to have almost disappeared in the draft regulations and as well the difference between large and small mines seems also to have been forgotten. The difference between the Phosphate mine and a large underground coal mine in the Hunter valley appears so obvious, it is worth being retained in the regulations. Without such a distinction being retained, it may well have the result that tourist operations where the public are able in a very small way to understand the history and process of mining operations will be largely curtailed because of unnecessary cost and regulation.

For example, the proposed requirements in areas such as air quality and ventilation, air quality monitoring, provision and regular testing of self rescuers, the requirement to test the Emergency Plan annually and in a range of other areas where the application of the same processes as full operating mining operations are to be applied to small, tourist mines, appear unnecessary. In addition, these provisions will add considerable additional costs to what is already an operation not making a profit.

Wellington Council respectfully requests that the draft regulations be reviewed so as to include some differences in treatment for small mines and for tourist operations.

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