

Objection to Russell Vale Underground Expansion Project

I am writing to object to the Russell Vale Underground Expansion Project. Some of the reasons for my objection are:

1. Risk to our water supply. They should not be allowed to mine the water catchment of the largest city on the driest inhabited continent on earth. After the terrible droughts we have experienced in this century, any further risk to the water supply is totally unacceptable. This mining will be happening in “Special Areas of the Greater Sydney Water Catchment”, according to Water NSW these areas are, “The **Special Areas** cover approximately 364,000 hectares of mostly unspoilt native bushland around the **water** storages and infrastructure that **supply Sydney**, the Illawarra, Blue Mountains, Southern Highlands and Shoalhaven **regions**. Public access and activities are restricted to protect **water** quality in these **areas**.” Now if public access is forbidden due to the sensitive and strategic importance of these areas surrounding the Cataract Reservoir, why on earth is a mining expansion being considered? There is great concern that the mine is risky because the seam of coal is being mined underneath two previously mined seams. Wollongong Coal propose to mine a third seam of coal (Wongawilli seam) beneath two previously mined seams. Multi seam mining has scant precedent and the outcomes are difficult to predict. Instability in the overlaying old Bulli seam workings may cause pillar collapse and subsequent surface subsidence of 1 to 2 metres. The land around the proposed mining is unstable. The proposal states, “It is noted that large areas of the surface within the UEP Application Area are currently on the verge of moving as a result of previous mining.” It is described as being in “limiting equilibrium” and still moving, having not stabilised since WCL mined long walls 4, 5 and 6 several years ago. The mine will also drain both surface and ground water from the Cataract Reservoir catchment, add this to drought and climate change, and the impact to the ecology will be devastating. As the area dries out, it loses the ability to sustain native plants, animals, birds, reptiles and insects in the area. All these things are important to our own survival as we are part of the ecosystem and rely on a functioning environment for our future. In the recent conflagration of 2019-2020 the Cataract Reservoir catchment area was one of the few areas that remained unburnt, if the water is removed from this area, this will increase the risk by making the area even drier and more flammable, this also increases the risk throughout the surrounding area, especially the Illawarra Escarpment.
2. The cost of coal mining is on future generations in a time when we should be moving to renewable forms of energy, not more polluting fossil fuels. Our outdated reliance on fossil fuels is leaving us open to the very real risk of a carbon tax being levied on our exports to Europe. An article in the Australian Financial Review (<https://www.afr.com/policy/energy-and-climate/the-carbon-tax-that-will-work-20200115-p53rmk>) on this matter is sobering. In other areas we are already experiencing damage to National Parks. The Tahmoor Colliery mining near the ancient Thirlmere Lakes has resulted in two lakes being empty for almost forty years. Even though the mining was approved and carried out under “strict regulations”, this has not stopped the damage. This is an opportunity to learn from our past errors. There is a risk that after the mining has ceased that water will flow into the void left by the mining and this could lead to water outflow that could last for generations, 160 years or even in perpetuity. This risk is not worth taking.
3. The Russell Vale Underground Expansion is the ‘thin edge of the wedge’ as the purpose of this proposal is to pave the way for larger expansion around Cataract Reservoir and to the west. This sort of proposal is playing ‘fast and loose’ with the future of Australians and is reckless. The stress, damage and loss of income for individuals and companies from desperate water restrictions has not even been considered.
4. As I have said, I am concerned for Australians present and future, so we must also take into consideration the residents of the area. The Colliery is in a densely populated area and residential growth is increasing. There are homes quite close to the colliery and schools within several hundred metres, all these people are at risk. How are the residents to cope with coal trucks, noise, particulate pollution and general dust? The increased traffic from trucks

moving coal to the Port Kembla Coal Terminal is estimated at seventeen trucks per hour leaving the colliery. This will increase noise, dust and traffic jams, never mind damage to the roadways that causes exponential costs in time, money and more pressure on the community, not even considering the toxicity of coal dust on humans and vegetation.

5. Is this expansion even economically viable? Can the people of NSW actually even gain anything from this expansion? The NSW government has been investigating whether Wollongong Coal is fit and proper to hold a mining license for 4 years but has never concluded the investigation, or released the findings. The company is no longer listed on the Australian Stock Exchange and therefore even the basic accountability requirements for ASX-listed companies do not apply.
6. We are currently failing miserably to reduce our Green House emissions and are unlikely to reach the target set for the Paris Agreement. The decline in economic activity in Australia due to the COVID-19 pandemic results in lower greenhouse gas (GHG) emissions projections for 2030, although Australia has not implemented an effective climate policy. The Australian government has initiated a "gas-led recovery" rather than a green recovery, and has continued to signal its support for the coal industry. The government has shown no intention of updating its Paris Agreement target nor adopting a net-zero emissions target, with the Prime Minister specifically ruling this out. The Government is focusing on what it calls a "technology neutral" approach, which is contradicted by its focus on gas. Renewable energy investments have dropped to 2017 levels due to the uncertainty in government policy direction. There is a lack of climate action, despite rising climate impacts such as the catastrophic bushfires that enveloped several states in late 2019 and early 2020. If approved, Russell Vale would be in the top one hundred emitters of Scope 1 emissions in Australia. Russell Vale is a gassy mine and a great deal of methane would be released into the atmosphere during mining, which as you know is a far worse GHG than even CO₂.
7. There is no guarantee that the alleged socio-economic benefits will be delivered or sustained given WCL's inability to safely and profitably operate mines. There are many documented incidents of poor work practices which put employees at risk.
8. In my research for this submission I came across countless worrying issues. One that Wollongong Coal does not pay company tax and that it has lost money every year such 2013, resulting in no taxable income and therefore no company tax paid. This is worrying - how are they going to expand when they are unprofitable? In 2019 they shut down Wongawilli mine after the NSW Resources Regulator identified "significant safety issues". There was also the incident where a longwall machine was buried in a roof collapse and workers were asked to take a pay cut to keep the mine going, but the company's offer of \$21.50 an hour combined with a loss of working conditions was voted down by miners. The miners were made redundant. Surely this is not a business play we should get behind as a community?
9. Another interesting fact brought to light was that it would cost the Australian government about \$24,000,000 to offset the GHG emissions that Russell Vale will generate. Wollongong Coal's cost benefit analysis (CBA) overstates the benefits and understates the costs. For example, the CBA does not include the cost of offsetting emissions from Russell Vale. In September 2020, the Clean Energy Regulator paid an average of \$15.74 per tonne of abatement to buy emissions reduction as part of their 11th Emissions Reduction Fund auction. Using this price as a guide, it would cost about \$24M to abate the 1,523,000 t CO₂-e of Scope 1 and 2 emissions that this project will generate in NSW over 5 years. As Wollongong Coal pay no company tax, it is somewhat unlikely they will contribute towards the cost of abatement.

In the light of the above objections outlined, the proposed Russell Vale UEP is not likely to be in the public interest. I ask that you reject this application from Wollongong Coal and recommend a process to close the mine at Russell Vale permanently.