

Independent Planning Commission
21st October 2020

Wollongong Coal Ltd Russell Vale Revised Underground Expansion Project (Major Project 09-0013) - Objection

I am a General Practice Registrar. I was raised on Dharawal country in the Illawarra, and worked in the Illawarra Shoalhaven Local Health District for three years after completing my medical studies. I currently work with people experiencing homelessness in Inner Sydney, on Gadigal country.

The proposed Russell Vale Mine expansion project will harm the health of the community. And it will harm people in different ways, further reinforcing existing inequities in health and wellbeing experienced by individuals and communities in the Illawarra.

There are many negative health impacts that will result from the Russell Vale expansion proposal, if approved. Three in particular are: Aboriginal cultural heritage destruction, air pollution, and greenhouse gas emissions.

Aboriginal cultural heritage destruction

Wollongong Coal's Revised Underground Expansion Project proposal document considers Aboriginal cultural heritage only in passing. It is incredibly difficult to find information of any worth relating to Aboriginal cultural heritage in this document. Table 5.1 in the UEP states that "several aboriginal heritage sites have been previously identified within the UEP area. These sites are mainly associated with rock shelters in sandstone cliff formations, and grinding groove sites on upland sandstone outcrops". There is no further information.

These sites are very vulnerable to subsidence-related damage. Media stories in recent weeks have described the damage to Whale Cave, a site within the Illawarra Escarpment area known for its extensive rock art, and estimated to be 6000 years old. It is believed that Whale Cave was irreparably damaged by bord-and-pillar mining at the Nebo Colliery in 1979. It is now being held up by wooden posts, but the rear wall of the cave is continuing to collapse. It is believed that there are as many as 4000 aboriginal cultural heritage sites across the Illawarra Escarpment. It is no comfort that Wollongong Coal believes that its bord-and-pillar mining method will not damage cultural sites within and adjacent to the UEP area, and it is telling that the UEP is so lacking in detail about where these sites even are.

Destruction of cultural heritage is part and parcel of the ongoing genocide and dispossession of Aboriginal peoples on this continent. As I am sure the Commission is well aware, Aboriginal people die on average 8 years younger than their non-Aboriginal counterparts, and rates of mental illness and suicide are astronomical compared with the rest of the population. An approval of the Russell Vale UEP will be complicit with the ongoing cultural genocide of Aboriginal peoples, the destruction of invaluable country and history, and contributes in very real terms to the ongoing poor health outcomes for Aboriginal people in this continent.

Air Pollution

The Russell Vale colliery is the closest mine to a suburban area in Australia. Homes are within 300 metres of the coal stockpile, and schools and preschools are within hundreds of metres of the stockpile as well.

There is extensive medical literature detailing the strong links between PM2.5 and PM10 pollution and a host of health conditions, such as cardiorespiratory disease, cerebrovascular disease, and cancers. It is clear that there is no level of PM2.5 or PM10 exposure that can be considered “safe”, and indeed the cumulative exposures to this particulate air pollution has an additive damaging effect on health.

Indeed, one of the Public Health Association of Australia’s key policy positions is *there is no known absolute safe level for inhalation of particulate matter so population exposure should be minimised.*

The Underground Expansion Project proposes two new coal stockpiles - bringing the total to three - an onsite coal processing plant, as well as 32 coal trucks an hour transporting the coal through residential areas to the Port Kembla Coal Terminal.

It is notable in the UEP document that the contribution of the 32 trucks an hour to the air pollution along the transport corridor is not considered in modelling. Particulate pollution from diesel engines is a notable carcinogen, with demonstrated links to bladder and lung cancers. It is also unclear what weather conditions were considered in the modelling of PM2.5 and PM10 concentrations in Section 6. Anyone who lives in the Illawarra knows that the region is often experiences very windy weather, especially in the Northern Suburbs where the Russell Vale Mine is located. It is unclear what the spread and concentration of this particulate pollution will be during windy weather. This ambiguity is especially concerning as there are predicted to be exceedences of the 24-hour average PM10 criterion to the north of the Russell Vale site - we do not know how the wind will effect these air pollution levels.

It is clear that the air pollution from the Underground Expansion Project will harm the health of the communities living near the mine and along the trucking route. There is no safe level for inhalation of particulate matter. These harms will disproportionately affect the already-vulnerable: very young, very old, pregnant people, and those with pre-existing health conditions. Approval of the UEP will worsen health outcomes and deepen health inequalities in these communities.

Greenhouse gas emissions

The UEP estimates that a total of 11,147,000 tonnes of CO2 equivalent will be generated over the 5 year life of the mine. This is comprised of 1,523,000 tonnes of Scope 1 and 2 emissions, and 9,624,000 tonnes of Scope 3 emissions. If approved, the Russell Vale Mine would be one of the Top 100 emitters of Scope 1 emissions in Australia.

The Lancet Commission in 2009 declared that “climate change is the biggest global health threat of the 21st Century”. The 2019 report of the Lancet Countdown on health and climate change described these issues more eloquently than I can, so I will quote from this paper:

- a child born today will experience a world that is more than four degrees warmer than the pre-industrial average, with climate change impacting human health from infancy and adolescence to adulthood and old age
- across the world, children are among the worst affected by climate change
- through adolescence and beyond, air pollution - primarily driven by fossil fuels, and exacerbated by climate change - damages the heart, lungs and every other vital organ... total global air pollution deaths reaching 7 million {in 2016}
- later in life, families and livelihoods are put at risk from increases in the frequency and severity of extreme weather conditions, with women among the most vulnerable across a range of social and cultural contexts

- finally, although difficult to quantify, the downstream risks of climate change, such as migration, poverty exacerbation, violent conflict, and mental illness, affect people of all ages and all nationalities.

Furthermore, climate impacts will not affect everyone equally. To quote the Lancet again, “by undermining the social and environmental determinants that underpin good health, climate change exacerbates social, economic and demographic inequalities”.

The argument that the Russell Vale Mine will contribute only a small proportion to the overall greenhouse gas emissions “balance” of this country, and is therefore permissible, is a fallacy. There is an overwhelming amount of evidence to demonstrate the immediate need to make drastic cuts in greenhouse gas emissions, to avoid widespread devastation to human societies and the biosphere as a whole. To approve the UEP would be to deny an immense body of scientific literature, and to disregard the contribution of each and every project to the overall picture of greenhouse gas emissions.

To approve this project is to endorse climate-related harms to our communities, and to signal that the community’s health and wellbeing is a secondary consideration in the face of resource extraction.

The Russell Vale Mine Underground Expansion Project proposal poses clear harms to the health of the communities of the Illawarra, and beyond. I steadfastly oppose this project, and we voice our concern for the thousands of individuals set to suffer the lifelong health impacts that Wollongong Coal’s operations would deliver to the region. We have an opportunity before us to preserve invaluable Aboriginal cultural sites, improve air quality, and decrease greenhouse gas emissions that contribute to the unfolding public health crisis that is climate change. This is a real opportunity to improve the health and wellbeing of our communities for generations to come.

Kind regards,

Dr Rada Germanos
B Med Sci, MBBS

