

22.10.2020

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Objection to Russel Vale Underground Expansion Project

I object to the Wollongong Coal Ltd's Russell Vale Revised Underground Expansion Project (Major Project 09-0013).

Some of the reasons for my objection are:

DAMAGE TO GREATER SYDNEY WATER CATCHMENT

Risky Mining in our water catchment

The mining will take place in the Special Areas of the Greater Sydney Water Catchment – areas that forbid public access because of their sensitivity and strategic importance - and up to an area underneath the shores of the Cataract Reservoir.

Triple seam mining

It is particularly risky mining – despite being bord and pillar method, not longwall – because a third seam of coal is being mined beneath two previously mined seams. Triple seam mining has little precedent and impacts are difficult to predict.

Wollongong Coal admits that instability in the overlaying old Bulli seam workings may cause pillar collapse and subsidence of the surface of almost 1 metre. It is unacceptable for the NSW government to allow such risky mining in the water catchment for 5 million people of Greater Sydney in a time of increasing drought.

More damage and water loss in our catchment

Although the bord and pillar mining method could be expected to lead to less damage than longwall mining, the approval of this expansion would also reactivate a lapsed approval for longwall mining, enabling 25m of longwall mining close to the upland swamp, CCUS4, to extract the abandoned longwall machine in longwall 6. This longwall mining should not be allowed to go ahead. Previous mining of Longwall 4 resulted in subsidence of 1.4 metres which was nearly five times the predicted subsidence (1).

Ecosystem degradation

The mining expansion will drain both surface and ground water from the Cataract Reservoir catchment. This dewatering, exacerbated by drought and climate change, will impact the biodiversity in the area. As the area dries out, it loses the ability to sustain native plants, animals, birds, reptiles and insects in the area.

THE ECONOMIC CASE FOR THE EXPANSION DOES NOT STACK UP

Short-changing NSW taxpayers

The coal would be mined for supply of WCL's parent company in India, Jindal Steel and Power Ltd (2); this expansion is unrelated to steel making in the Illawarra. By selling to the parent company, WCL is unlikely to get the best price and therefore the people of NSW are

likely to be short-changed on even the meagre royalties.

NSW government's failure to respond to the company's financial situation

Wollongong Coal's liabilities outweigh its assets by approximately A\$1 billion. It cannot be expected to properly resource mining in the sensitive and strategically important water catchment. Furthermore, 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 (3). 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 investigation is still going on, with the government just saying that they can't establish that the company is *unfit* and *improper* (4). This company is not fit and proper. They should not be allowed to mine the water catchment of the largest city on the driest inhabited continent on earth.

THE MOTIVATION FOR THE DEVELOPMENT

More mining around Cataract Reservoir

The Dept Planning confirms that the purpose of this proposal is to pave the way for a much larger expansion of mining around Cataract Reservoir and to its west (5). It is reckless and lacking in forethought for the NSW government to further jeopardise the integrity of the water catchment. Cataract Reservoir area has been extensively mined already and the ground was still moving 25 years after a project in the 1990's longwall mined around and under the Reservoir (6). The Special Areas of Greater Sydney Water Catchment should be declared off limits to mining. They should be protected, not only on the surface, but to the centre of the earth.

1. Gujarat NRE Coking Coal Ltd NRE No. 1 Colliery Longwall 4 End of Panel Report, p.15, Accessed 26.9.20 at <http://wollongongcoal.com.au/monitoring-r/>
2. Russell Vale Revised Underground Expansion Project (MP09_0013) | Secretary's Final Assessment Report, op cit, p. 14
3. <https://www.abc.net.au/news/2020-08-19/wollongong-coal-delists-from-asx/12575396>
4. <https://www.illawarramercury.com.au/story/6836111/wollongong-miner-escapes-fit-and-proper-investigation-as-regulator-finds-no-evidence/>
5. Russell Vale Revised Underground Expansion Project (MP09_0013) | Secretary's Final Assessment Report, op cit, p. 14
6. Is there a 4th Dimension to Subsidence Monitoring? W Ziegler, Manager Mining Impacts, NSW Dam Safety Committee and H Middleton, Mining Regulation Officer, NSW Dam Safety Committee, Proceedings of the 9th Triennial Conference on Mine Subsidence, 2014, Accessed at https://moam.info/mine-subsidence_5c555997097c47034d8b45b0.html

