

Wollongong Coal's Revised Underground Expansion Project for Russell Vale:

I object to the Wollongong Coal Ltd's Russell Vale Revised Underground Expansion Project (Major Project 09-0013). It is not in the public interest, either locally or globally for such a project to be approved.

Some of the reasons for my objection are:

Damage of overlying important terrestrial and aquatic areas of high biodiversity and ecological endemism; bushfire risks

As a recent PhD graduate from Macquarie University who investigated the ecology and ecological productivity in upland peat swamps (THPSS), I am most concerned that these protected and rare ecosystems are increasingly being damaged.

The Russell Vale coal mine is anticipated to have much greater subsidence than originally described (1). Subsidence such as that expected not only reduces water resources to our largest Australian city, opposed by WaterNSW (2) but the ecological damage is terminal. Expected dewatering of the protected water sources have multiple effects on both terrestrial and aquatic systems above them. These sandstone ecosystems are both highly biodiverse and endemic. Drying terrestrial ecosystems have several effects: loss of available habitat for plant species, fauna who depend on them and food webs that hold the systems together. Bushfire danger is expected as these bushland areas dry out, exacerbated by climate change. As aquatic systems dry out, groundwater and surface water dependent ecosystems are lost. These systems are still poorly known, with many species still undocumented and not identified. And in the areas around Cataract Reservoir, heavily vegetated and close to large populations, this is a significant risk (3).

Direct impacts such as dewatering of surface and groundwater systems are not the only effects, indirect impacts are also important. Already, there is strong evidence that similar ecosystems on the Newnes Plateau were losing their aquatic features due to underground coal mining before bushfire destroyed their remnant swamp vegetation (4, Baird and Benson 2020).

Climate Change, economics

However, there are also larger issues at play. Climate change is one of greatest threats to the future of a sustainable world. Increasing coal production at a time when not only is the climate change dangers are urgent and imperative, there is also a strong economic argument against it. The economic case does not stack up. The company reports a debt of \$1 billion and is no longer listed on the ASX, therefore may be a greater risk in operation. Other coal mines across Australia are at risk of failing, including the much mooted Adani Coal Mine in the QLD Galilee Basin. If this coal mine and other neighbouring coal mines go ahead, there will be excess coal around Australia, enough to close down all of the NSW coal mines. Corporate investors such as superannuation funds are decarbonising their investments, large corporations such as BHP are reducing their exposure to coal, and the IMF is supporting action by the EU which is threatening to impose carbon border taxes on countries who are large carbon emitters. Australia is such a country, with high levels of high carbon exports (5).

The costs to the Australian Government are many. 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 (6). 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

Only this morning our respected Finance Minister, Matthias Cormann, is reported in remarks to an online conference earlier this week embracing green recovery following COVID-19. He said the Asia-Pacific region needed to "grasp the opportunities presented to us by this pandemic".

"Opportunities like the pursuit of an inclusive and future-focused recovery, including a green recovery with an increased reliance on renewables, improved energy efficiency, addressing climate change and accelerating the transition to a lower-emissions future," Cormann said, according to a transcript seen by Guardian Australia(7).

Myriad other reasons

As well as these arguments are those associated with indirect economic costs: air, downstream water and noise pollution and their health effects to local communities, the high chance of stranded assets, payable by Australian taxpayers left with insolvent foreign companies, insecurely employed and and strategically unprepared workforces who require training into new vocations.

The risks are just too large; ecological, water resources, economic, social and cultural. Please do not approve this coal mine. It will be a disaster. The proposed Russell Vale UEP is not in the public interest. We ask that you reject this application from Wollongong Coal and recommend a process to close the mine at Russell Vale permanently.

1. <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2020/russell-vale-uep/201013-meeting-with-resource-regulator-transcript.pdf>
2. https://www.waternsw.com.au/_data/assets/pdf_file/0020/132167/WaterNSW-submission-to-the-IEP-Task-1-of-Terms-of-Reference-vB.pdf
3. https://www.waternsw.com.au/_data/assets/pdf_file/0011/127559/20161223-WaterNSW-Literature-Review-Underground-Mining-V3.pdf
4. Baird, Ian & Benson, Doug. (2020). Severe impacts of longwall coal mining in endangered Newnes Plateau Shrub Swamps, exposed in December 2019 fires. Australasian Plant Conservation. 20. 12-15.
5. <https://www.climatechangenews.com/2020/09/17/imf-endorses-eu-plan-put-carbon-price-imports/>
6. 20 11th Emissions Reduction Fund auction results, 18 September 2020
Accessed at: <http://www.cleanenergyregulator.gov.au/ERF/Pages/News%20and%20updates/News-Item.aspx?ListId=19b4efbb-6f5d-4637-94c4-121c1f96fcfe&ItemId=837>
7. <https://www.theguardian.com/australia-news/2020/oct/23/matthias-cormann-talks-up-green-recovery-as-part-of-his-pitch-to-lead-oecd>