**25/10/2020**

To Whom It May Concern,

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

My reasons for objecting are multiple, though all fall under the same broad concern: that it is irresponsible to risk critical public resources like our drinking water, our air and our local natural environment, and to risk infringing on our own emissions targets to safeguard our future wellbeing, for such meagre economic gains to our community.

**Our water**

The proposed expansion will take place in ‘Special Areas of the Greater Sydney Water Catchment’ – these are areas where public access is prohibited due to the significance and vulnerability of these areas. Further, the type of mining proposed in these sensitive areas, triple seam mining, is especially risky with unpredictable consequences. Of even greater concern are recent findings that the previously calculated subsidence levels were underestimated; a subsidence engineer has given evidence that the cumulative effects of mining in multiple seams in a previously mined area is hugely hazardous due to insufficient knowledge of the condition and location of the ‘marginally stable pillars’ in the Bulli seam.

The unknown risks to our water catchment, and to our escarpment, are too great.

The proposal also allows for further longwall mining in this area, leading to further water loss in the catchment and further risks in these vulnerable areas.

**Our air**

The Russell Vale colliery is the closest mine to dense residential areas than any other mine in Australia, and local residents are being exposed to noise and particulate pollution from this site; any expansion of the site will result in further particulate pollution to residents, particularly as Wollongong Coal Ltd (WCL) plans to build a coal processing plant to process coal on site.  This is a highly unsuitable area for coal processing - with homes bordering the colliery site on 3 sides, and just 225 metre from coal stockpiles and with schools located several hundred metres away.

This proposal would involve the trucking of mined coal along Bellambi Lane and the Northern Distributer, through dense residential areas to the Port Kembla Coal Terminal. According to WCL’s own estimates this would mean 17 loaded trucks per hour, or 34 truck movements per hour, or 1 truck every 1 minute 45 seconds driving through residential areas with already strained traffic conditions. The particulate pollution associated with coal is known to increase human morbidity and mortality from respiratory and cardiovascular disease, and this proposal would increase the number of stockpiles, increasing the stockpiled coal surface area and increasing the particulate pollution from the colliery.

**Our local environment**

This proposal would see the continued draining of ground and surface water from Cataract Reservoir and the catchment, meaning a further 131 ML/year of ground water and 10 ML/year of surface water in addition to the losses from previous mining damage. At the project’s completion the empty mine site will fill with discharged mine water and will eventually overflow and will increase in outflow indefinitely according to WCL’s own modeling. This mine water discharge will require indefinite ongoing management, which will be left to future generations to oversee and cover financially. How will this be addressed by WCL?

**Our emissions targets**

If the Russell Vale coal project goes ahead, an additional 304,600 t CO2-e per annum of Scope 1 and 2 emissions will be added to the NSW GHG inventory at a time when NSW Government policy requires a reduction in GHGs of 35% by 2030. The Russell Vale project would add about 0.3 MtCO2-e every year for the next five years, thus working in the opposite direction and nulling about 12% of the intended reductions in all other areas of NSW industry and commerce.

**WCL’s poor record of economic and social responsibility**

The coal mined from Russel Vale will be shipped to WCL’s parent company in India, Jindal Steel and Power Ltd (10) and will contribute nothing to steel making in the Illawarra.  Residents of the Illawarra are unlikely to see even the minimal royalties from the mine. Further, the NSW government has failed to respond WCL’s financial situation - its liabilities outweigh its assets by approximately A$1 billion, it is no longer listed on the ASX and so even the basic accountability requirements for ASX-listed companies do not apply. Although the NSW government has been investigating whether WCL is ‘fit and proper’ to hold a mining license for the last 4 years, it has never concluded the investigation or released the findings and the investigation is still going on. WCL has a history of poor management and compliance and has demonstrated blatant disregard for public health and safety. Residents now have no confidence in WCL to comply with any mitigation strategies or to operate the plant according to safe standards.

Amy Luschwitz

0423115095

[amy.luschwitz@lycos.com](mailto:amy.luschwitz@lycos.com)