

Submission to IPC – Mr Kim Wagstaff – Oatley NSW 2223

Wollongong Coal's Revised Underground Expansion Project for Russell Vale

I object to Wollongong Coal Ltd's Russell Vale Revised Underground Expansion Project (UEP) (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.

- **New information shows that subsidence may be much greater than originally portrayed**

The transcript of a meeting between the Resources Regulator and the IPC Panel on 13 October 2020 reveals that the subsidence impacts of the proposed mining may be much more serious than the Dept of Planning has portrayed. It appears that subsidence has continued above longwalls 4 and 5; what was reported several years ago as 1.4 metres of subsidence (still nearly 5 times the predicted subsidence of 30cm) is now 1.78m of subsidence. A subsidence engineer expressed concern that the cumulative effect of the new project beneath two previously mined coal seams could trigger instability of “marginally stable pillars” in the overlying Bulli Seam mine. This new information needs further investigation, research and analysis.

- 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

- **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.

- **Increasing bushfire risk**

The draining of ground and surface water caused by the mining will make the Cataract Reservoir catchment area, one of the few areas of unburnt bushland in NSW, drier and more flammable. This increases the bushfire risk, not only around Cataract Reservoir, but also along the heavily treed Illawarra Escarpment.

ETERNAL COST OF COAL MINING ON COMMUNITY AND FUTURE GENERATIONS

- **Ongoing water treatment requirements will cost future generations**
The project will further the loss of ground and surface water from Cataract Reservoir and its catchment, adding 131 ML/year of ground water and 10 ML/year of surface water to losses from previous mining damage. This is estimated to bring the total ground and surface water loss from the project to 298 ML/year. This is the equivalent annual water usage of over 4,000 people.
- **Unending mine water discharge at the Illawarra Escarpment**
After the project is finished the mining void will fill up with water. The water will keep rising until it reaches the adit (mine portal) in the Illawarra Escarpment in about 2057. The water will overflow through the adit and the outflow will slowly increase, reaching 0.3ML (300,000 litres) per day in 2179. WCL's modelling shows that the volume of water outflow at the adit above Russell Vale will continue to flow, even beyond 2179. In other words, there will be escalating water discharge from the adit for at least 160 years... perhaps, in perpetuity.
- **The Planning Department's failure to protect our water**
The outflow will need to be managed and treated and Wollongong Coal is proposing a commitment to do this for 10 years. The company, as the current mining lease holder, not generations of NSW taxpayers should be responsible for all future discharge. The Planning Department's recommendation that Wollongong Coal be required to merely "make a plan" for outflow management is ludicrous; it is indicative of the Department's failure to protect our water through decades of mining the Greater Sydney Water Catchment.

CLIMATE CHANGE AND GREENHOUSE GAS (GHG) EMISSIONS

- **More Greenhouse Gas Emissions when we need to reduce emissions**
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. In a recent submission on the Narrabri Gas project, former Chief Scientist of Australia Professor Penny Sackett stated that meeting NSW's own 2030 GHG target "will require an annual new reduction of about 2.4 MtCO₂-e per year, year on year". 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.
- **Top 100 GHG emitters for very little coal**
If approved, Russell Vale would be in the top 100 largest emitters of Scope 1 emissions in Australia. Russell Vale is a gassy mine, meaning a lot of methane would be released into the atmosphere during mining. Australia is already – by far – the largest exporter of metallurgical coal. Russell Vale would add only a very small volume of additional coal (about an extra 0.25% per annum) to export volumes but it would add a large volume of GHGs to NSW's inventory.

A HIGH RISK THAT PROMISED SOCIO-ECONOMIC BENEFITS WON'T BE DELIVERED

- **Insecure employment and safety risks**
There's a high risk that promised socio-economic benefits won't be delivered or sustained given WCL's inability to safely and profitably operate mines.
 - In April 2019, Wollongong Coal shut down operations at its Wongawilli mine throwing 45 people out of work after the NSW Resources Regulator identified "significant safety issues".
 - In 2017 a 'catastrophic failure' of a diesel engine occurred at Wongawilli, which the Regulator said could have caused an explosion in the methane-rich underground workplace.

- In 2014, 100 miners lost their jobs at Wongawilli after an expensive longwall machine was buried in a roof collapse. 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.
- **Wollongong Coal does not pay company tax**
Wollongong Coal has lost money every year since 2013 when the current majority owner took control. As the company has not generated a taxable income, zero company tax has been paid to the Australian Government since 2013. This is very unlikely to change in future.
 - **It would cost the Australian government about \$24M 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, they will likely contribute nothing towards the cost of abatement.

The proposed Russell Vale UEP is not in the public interest. I ask that you reject this application from Wollongong Coal.