

I object to the Wollongong Coal Ltd.'s Russell Vale Underground Expansion Project.

### **Water Catchment Special Area**

My key concern is that the mining will occur within the Sydney drinking water catchment designated Special Area. As a professional engineer working in the water industry, I know firsthand the long term risks we are placing on our crucial water supplies by the continuation of mining in the catchment. Scientists and academics have pointed out the inadequacy of the available data and methods for determining the impact of mining in the catchment (see *Open Letter to the Premier of NSW Regarding Coal Mining in the Schedule 1 Special Areas of the Sydney Drinking Water Catchment*, dated 18/05/2020). We do not have a comprehensive understanding of the long-term impacts on water quality and movement.

This project risks serious and irreversible harm to the catchment. One of the objectives of the EP&A Act is to facilitate ecologically sustainable development, a key part of which under NSW law is the precautionary principle. NSW case law has established that the need for measures to be taken under the precautionary principle is triggered when two conditions exist: a threat of serious or irreversible environmental damage and scientific uncertainty as to the environmental damage. The scientific community is warning us that both these conditions exist and that mining in the catchment should not continue (see *Open Letter to the Premier of NSW Regarding Coal Mining in the Schedule 1 Special Areas of the Sydney Drinking Water Catchment*, dated 18/05/2020). The precautionary principle tells us we should not proceed while scientific understanding of the risks is lacking. Too much is at stake.

As climate change continues to impact Australia, the need to secure our water supplies in the long-term far outweighs the short-term economic benefits of the mining operation.

### **Community Impacts**

As a resident of Russell Vale, I am concerned about the impacts on the local community. The mine is closer to a residential area than any other mine in Australia. The expansion of the stockpile area and the new processing facility will only increase the particulate pollution risk to the local community over previous mining operations at the site. The mitigation conditions proposed are insufficient and given the proximity to residential areas of the proposed facilities, it seems unlikely that any practical mitigation measures will be sufficient.

### **Climate Change**

The world is at a critical juncture. We know well enough what will happen if we fail to act on greenhouse gas emissions. This is a moral issue and there is no excuse not to take action.

The Greenhouse Gas and Energy Assessment for the project pointed to the contribution of the mine as a small percentage of global greenhouse gas emissions, and that the project was unlikely to impact global climate change trajectories. This is an erroneous comparison. By this logic no one should make any effort to reduce emissions or combat climate change.

Supporters of this project point to the lack of alternatives to metallurgical coal in steel making. Alternatives do exist and are in active use in Australia and around the world. Continuing to mine

metallurgical coal only delays the transition that we know must occur, and further locks in cumulative carbon emissions.

### **Long-term Environmental Impacts and Inter-generational Equity**

The principle of inter-generational equity, defined in NSW law, states that the present generation should ensure that the health, diversity, and productivity of the environment are maintained or enhanced for the benefit of future generations.

Taking into account the risk to the drinking water catchment, climate change and other long-term environmental impacts (such as permanent drainage from the mine), this project places minor, short-term economic benefits above issues that future generations must deal with in perpetuity. Approval of this project would disregard our duty to future generations.

The proposed Russell Vale Underground Expansion Project is not in the public interest.

Jonathan Knudsen