26 October 2020

I wish to lodge an objection to Wollongong Coal’s proposed expansion of the Russell Vale coal mine.

I believe there are many compelling reasons why the expansion should *not* be approved. Some of my key concerns are outlined below:

**Risk of damage to water catchment**

The proposed mining would take place in the Special Areas of the Greater Sydney Water Catchment – an area regarded as being so critical and sensitive that people are not even allowed to walk there.

It therefore surprises me that the NSW government would countenance a major mining operation beneath the catchment area and potentially under parts of Cataract Dam.

I understand that Wollongong Coal proposes to mine a third seam of coal beneath two previously mined seams – or multiple seam mining – a method which has little precedent in Australia. Multiple seam mining ‘can cause significant geotechnical hazards including pillar and roof instability, in some cases to the point of collapse’. (1)

Our protected catchment areas provide water to some five million people and are surely one of the greatest assets of Sydney and the Illawarra. Our water catchments should not be put at risk for questionable short-term gains. It is my understanding that if the bed of a dam or waterway is cracked by mining operations, vast amounts of water can be lost, and the damage would be almost impossible to rectify.

**Unsuitability of Wollongong Coal to manage the coal mine**

I understand that the NSW Government has conducted a four-year investigation into the fitness of Wollongong Coal to hold a mining license, with no final determination yet released. The company’s Wongawilli mine was closed after a string of disastrous safety issues.

In 2017, Wollongong Coal was taken to court for its alleged failure to pay $288,000 in rent and levies to the NSW Government. (Mininglink.com.au 27 June 2017.)

I understand that Wollongong Coal remains in a precarious financial position, with its owners in debt by about AUS $1 billion. This increases the likelihood that corners will be cut in terms of safety and environmental safeguards. The potentially enormous and ongoing remediation costs at the end of the project are likely to be left as a legacy for NSW taxpayers.

Sydney Professor and forensic accountant Sandra van der Laan commented in the ABC news (19 August 2020): "I don't think I'd be very confident about granting a licence to a company in such a parlous financial position."

**Questionable financial returns to NSW and Australia**

It is on the public record that Wollongong Coal has not paid company tax in Australia since 2013. As the company is about $1 billion in debt, this situation is likely to continue.

The company has previously been taken to court for unpaid taxes and levies to the NSW Government of $288,000.

Promised jobs have proven to be insecure. At the Wongawilli mine, Wollongong Coal attempted to slash workers’ wages before closing the mine completely.

The cost of remediating damage caused by the mining operation seems unlikely to be covered by the indebted Wollongong Coal company, and will probably become a long-term financial burden on the tax payers of NSW.

**Health effects on nearby community**

The existing mine is very close to homes and schools, where people are affected by coal dust, noise and traffic impacts when the mine is in operation. These impacts will obviously increase significantly if the mine expansion, which includes a coal processing plant and additional coal stockpiles, is allowed to go ahead.

A fact sheet on coal dust health impacts on the NSW Health website states that: “PM (particulate matter) exposure can lead to a variety of health effects. For example, numerous studies link particle levels to increased hospital admissions and emergency room visits and even to death from heart or lung diseases. Both long (over years) and short term (hours or days) particle exposure have been linked to health problems.” The fact sheet goes on to say that children, the elderly and people with asthma and other health conditions are particularly susceptible to coal dust related disease.

As the health risks of coal dust are well known, it would seem to be negligent on the part of the NSW Government to allow coal mining operations to continue at Russell Vale, and any expansion of activities of activities at the site should certainly be ruled out.

**Contribution of the coal mine to climate change**

The NSW Government website ([www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)) states that: “The NSW Government is committed to effective action on climate change.”

It is the stated policy of the NSW Government to reduce greenhouse gas emissions by 35% by 2030. The Russell Vale mine project would work in direct opposition to this goal, adding an additional 304,600 t CO2-e of Scope 1 and 2 emissions to the NSW GHG inventory in each year of operation. (2)

Thank you for taking the time to consider my submission. I call on you to reject Wollongong Coal’s expansion project at Russell Vale as it carries huge risks, is likely to cause permanent environmental damage, and offers little benefit to the community.

Yours sincerely

Heather Wright

27 Northcote Street

Coledale NSW 2515

[Heatherwright2020@gmail.com](mailto:Heatherwright2020@gmail.com)

0468 408 508

1. *An Assessment of Multiple Seam Mine Stress Conditions Using a Numerical Modelling Approach*. Brittany McArdle, University of Queensland, November 2016.
2. Russell Vale Revised Underground Expansion Project (MP09\_0013) | Secretary’s Final Assessment Report, op cit, p. 66