

Wollongong Coal's Revised Underground Expansion Project for Russell Vale

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

Some of the reasons for my objection are as follows:

The cost of coal mining to our community's water supply – now and in the future

Ongoing water treatment requirements will cost future generations

The project will add to the already well-documented, significant losses - due to mining - of ground and surface water from Cataract Reservoir and its catchment. It is estimated the total ground and surface water loss will be equivalent to an annual water usage of over 4,000 people (1). We no longer have this to spare.

Long term mine water discharge at the Illawarra Escarpment

After the project is finished the mining void will fill up with water until it reaches the adit (mine portal) in the Illawarra Escarpment (about 2057) (2). There will be escalating water discharge from the adit for at least 160 years... perhaps in perpetuity. What an appalling legacy to contemplate.

The Planning Department's failure to protect our water

The outflow will need to be managed and treated. Wollongong Coal is proposing a commitment to do this for ONLY 10 years, with the NSW Planning Department simply requesting they "make a plan" for outflow management – a plan is plainly ridiculous in the face of the monstrous risks.

Climate change and greenhouse gas emissions

We need to reduce emissions not increase them – the science is IN

NSW Government policy requires a reduction in greenhouse gas emissions (GHG) of 35% by 2030 (3). If the Russell Vale coal project goes ahead, an additional 304,600t CO₂-e per annum of Scope 1 and 2 emissions will be added. In a submission on the Narrabri Gas project, former Chief Scientist of Australia, Professor Penny Sackett, noted 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"(4). The Russell Vale project would add enough carbon dioxide to null about 12% of the intended reductions in **all other** areas of NSW industry and commerce.

Top 100 green house gas 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 - a lot of methane would be released during mining. Russell Vale would add only a very small volume of additional coal (about 0.25% per annum) to Australia's exports, but would add a large volume of GHGs to NSW's inventory.

There is no economic case for expansion, only risk

Short-changing NSW taxpayers

The coal would be mined for supply of WCL's parent company in India, Jindal Steel and Power Ltd, obviously unrelated to steel making in the Illawarra. By selling to the parent company, WCL is unlikely to get the best price. The people of NSW are therefore likely to be short-changed on existing, already meagre, royalties.

NSW Government's failure to respond to the company's financial situation

Wollongong Coal's liabilities outweigh its assets by approximately A\$1 billion. How therefore, can it be expected to properly resource mining in the sensitive and strategically important water catchment, so far from the parent company? Even more worryingly, the company is no longer listed on the Australian Stock Exchange and therefore even the basic accountability requirements for ASX-listed companies do not apply(5). A four year investigation (by the NSW Govt) of WCL's fitness to even hold a mining license, has **never** been concluded, nor any findings released. The government advise that they can't establish whether the company is **unfit** and **improper** (6). Seriously? Aiming to confirm a negative? This company is patently not fit and proper, based on its financial status alone (safety is another major issue that I am sure you are addressing). They should not be allowed to mine anywhere, let alone the water catchment of the largest city on the driest inhabited continent on earth.

Impact on YOUR community

Proximity to Residential Areas

The colliery site is closer to dense residential areas – with density increasing significantly e.g. Corrimal Cokeworks - than any other mine in Australia. Russell Vale is not a suitable location for a colliery that includes a processing plant, even ignoring the poor economic outcomes. "Mitigation" measures cannot remedy the issues and WCL has been unwilling, and/or unable, to comply with compliance issues raised in previous approvals (7). Residents therefore, have, justifiably, no confidence in any conditions or commitments associated with this high risk, environmentally unsound project.

Particulate Pollution

Homes border the colliery site on 3 sides, just 225 m from coal stockpiles, with schools also located just several hundred metres away. The colliery is a major source of particulate pollution. It is well documented that coal particulate pollution increases human morbidity and mortality from respiratory and cardiovascular disease, not to mention the cost to strained, local medical services. Russell Vale is no longer an appropriate location for **any** colliery, let alone an expanding one.

Coal Trucks are a traffic hazard and pollution risk

The coal would be trucked along Bellambi Lane, through a residential area, onto the Northern Distributor to Port Kembla Coal Terminal. The mine proposes to

produce up to 1 million tonnes of coal plus 0.2 million tonnes of fill material per annum. The maximum truck frequency leaving the site will be 17 loaded trucks per hour, which is 34 truck movements per hour, **or 1 truck every 1 minute 45 seconds** (6). The Northern Distributor is already beyond capacity in peak hour with regular traffic jams. Even worse, as well as adding to significant congestion to this main arterial road, the coal trucks will add coal dust/particulate pollution to the pollution already occurring because of high traffic volumes.

Pollution from loading coal onto trucks with tractors

The proposed new truck loading facility will not be operating for years (if ever) and until then, loading trucks off the stockpiles with tractors, on unsealed roads, will create more particulate and noise pollution. WCL was supposed to build a truck loading facility as a requirement of their previous approval, but the NSW Government failed to enforce this condition. We, the Wollongong community, are now left with last century methods of truck loading, and if this proposal goes ahead, the local community will pay the price.

Do you want to be responsible to your children and grandchildren, or indeed your community, for the consequences? You have a chance to make a difference. Please oh please take it with both hands, now, while you can.

- 1 Russell Vale Revised Underground Expansion Project (MP09_0013) | Secretary's Final Assessment Report, op cit, p. 48
- 2 Russell Vale Colliery – Underground Expansion Project, Russell Vale East, Revised Mine Plan Groundwater Assessment, GeoTerra, p. 97 accessed 26.9.20 at <https://majorprojects.accelo.com/public/7f32dda24beaa9a6c18ea7d52be9c53d/RtPAC%20Second%20Review%20FINAL.pdf> (p. 390 of whole document)
- 3 <https://www.environment.nsw.gov.au/topics/climate-change/net-zero-plan>
- 4 Expert Report on the Greenhouse Gas and Climate Implications of the Narrabri Gas Project (SSD-6456), Professor Penny D Sackett Honorary Professor, Climate Change Institute, The Australian National University Advice Provided: 9 August 2020, p. 24, accessed at https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/03/narrabri-gas-project/correspondence/edo/sackett-narrabri-gas-project-ipc-advice-revised_final.pdf
- 5 <https://www.abc.net.au/news/2020-08-19/wollongong-coal-delists-from-asx/12575396>
- 6 <https://www.illawarramercury.com.au/story/6836111/wollongong-miner-escapes-fit-and-proper-investigation-as-regulator-finds-no-evidence/>
- 7 <https://www.illawarramercury.com.au/story/5325881/wollongong-miner-cant-handle-coal-pollution-says-epa/>
- 8 Russell Vale Revised Underground Expansion Project (MP09_0013) | Secretary's Final Assessment Report, p.13, accessed at <https://www.ipcn.nsw.gov.au/projects/2020/08/russell-vale-underground-expansion-project> ("DPIE Final Assessment Report")