

Re: Russell Vale Underground Expansion Project (MP 09_0013)

I write to you in strong opposition to the above-mentioned project on the following grounds;

Damage to the Greater Sydney Water Catchment

Though this mining project will utilize the bord and pillar method, it will take place below two existing coal seams that have already been mined using the longwall method. There is little precedent for triple seam mining of this nature and as such the impacts are entirely unpredictable. The public water supply of five million people is nothing to gamble with on unpredictable outcomes.

In addition, the existing mined coal seams have already resulted in significant damage to the water catchment and this damage continues to grow worse over time. 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. The expert makes several concerning statements before the meeting was cut short for private “internal” discussions of the IPC commissioners and staff present. These include:

– *“It’s a substantial effort to control the risk hazard of those marginally stable rock masses, because the – by nature, by definition, they do not need a lot of external force to become non-stable.”*

– *“Importantly, without a reasonable understanding of this key risk factor” [the state and location of the marginally stable pillars in the Bulli seam] “we are in the dark in making decisions in relation to Russell Vale Colliery’s proposed revised underground expansion project. That’s an important message.”*

Furthermore, 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 and additional risks associated with climate change.

Additional damage could occur to the water catchment as the approval of this expansion would 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 1.78 metres which is almost six times the predicted subsidence.

Ecological Impacts

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, mammals, birds, reptiles and insects in the area. Species will be lost and with them, ecological function will be degraded.

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. This puts plant and animal life at risk, including endangered species and threatened ecological communities. It also threatens human life, property, businesses, etc. Given the chaos and destruction we saw along the east coast of Australia last fire season, the idea that any body, government or otherwise, would do anything to further increase bushfire risk in the age of climate change is unconscionable and quite frankly unethical.

ETERNAL COST OF COAL MINING ON COMMUNITY AND 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.

The damage done to the water catchment has been shown to be unable to be remediated. Wollongong Coal's own assessment predicts that 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. This damage and the water loss it generates over many generations is unacceptable and should not be passed onto those future generations.

The outflow will need to be managed and treated, as indicated above, for at least 160yrs. 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.

THE MOTIVATION FOR THE DEVELOPMENT

The Dept Planning confirms that the purpose of this proposal is to pave the way for a much larger expansion of mining around Cataract Reservoir and to its west. It is reckless and lacking in forethought for the NSW Government to further jeopardise the integrity of the water catchment by allowing this to happen. Cataract Reservoir area has been extensively mined already and the ground was still moving 25 years after a project in the 1990's longwall mined around and under the Reservoir. If the Special Areas of Greater Sydney Water Catchment are too sensitive and important to allow bushwalkers, they are clearly unsuitable for the destructive nature of coal mining operations and should be declared off limits to them. They should be protected, not only on the surface, but to the centre of the earth.

IMPACT ON LOCAL COMMUNITY

The colliery site at Russell Vale is closer to dense residential areas than any mine in Australia. Residential communities have suffered the impacts from this mine over many years, over many generations, including from noise and particulate pollution. In this day and age, Russell Vale is not a suitable location for a colliery and "mitigation" measures grossly insufficient to remedy this.

Wollongong Coal plans to build a coal processing plant at the Russell Vale Colliery and process coal on site. Again, the Russell Vale mine is the closest mine to any built up residential area in Australia and is not a suitable area for coal processing. Moreover, the proponent has been unable or unwilling to comply with many conditions of past approvals and the NSW Government has proven to be unable or unwilling to enforce compliance. Residents have no confidence in conditions or commitments to operate the processing plant according to safe and suitable standards.

The coal would be trucked along Bellambi Lane, past people's homes 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, that is 34 truck movements per hour, or 1 truck every 1 minute 45 seconds. The Northern Distributor is already at capacity in peak hour with regular traffic jams. This large number of coal trucks will only exacerbate the situation. It will delay and endanger drivers on the main arterial road of the Illawarra's growing northern suburbs. The coal trucks will also cause coal dust/particulate pollution along the trucking route, as well as cause ruts along the roadway that will endanger all other road users.

The colliery is too close to residential areas, with homes bordering the colliery site on 3 sides, just 225 m from coal stockpiles and schools 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. Coal stockpiles have a large surface area that is prone to dust generation. This development proposes two new stockpiles, bringing the total number to three. This will increase the stockpiled coal surface area further and exacerbate the particulate pollution from the colliery, further increasing health risks. It will be undeniably and unacceptably dangerous to the health of local residents.

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, so we are now left with last century methods of truck loading and the local community will pay the price.

THE ECONOMIC CASE FOR THE EXPANSION DOES NOT STACK UP

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

Wollongong Coal's liabilities outweigh its assets by approximately A\$1 billion. It cannot be expected to properly resource mining in the sensitive and strategically important water catchment. Furthermore, 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. The NSW Government has been investigating whether Wollongong Coal is fit and proper to hold a mining license for 4 years but has never concluded the investigation or released the findings. The investigation is still ongoing, with the government just saying that they can't establish that the company is *unfit* and *improper*. This company is not fit and proper. They should not be allowed to mine the water catchment of the largest city on the driest inhabited continent on earth.

CLIMATE CHANGE AND GREENHOUSE GAS (GHG) 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.

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.

The science is certain, as a global community we must reduce greenhouse gas emissions by 50% by 2030 and be down to net zero emissions by mid-century if we are to avoid complete ecological disaster. We cannot achieve this task if we continue to approve fossil fuel projects. We have a moral obligation to future generations to find cleaner ways, many of which already exist and are cheaper to build and operate, to ensure we hand to them a planet that can meet their basic needs.

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

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" (16).
- 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 (17).
- In 2014, 100 miners lost their jobs at Wongawilli after an expensive longwall machine was buried in a roof collapse (18). 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 (19).

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 \$24,000,000 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 (20). 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.

Wollongong Coal Has No Social License

On October 26th, 2020 the Wollongong City Council voted unanimously to submit a formal objection to the IPC on this project. They do so as representatives of the Wollongong Local Government Area, as representatives of its people. As such, this mine expansion does not have the approval of the people. It has no social license to operate from the residents that will live alongside it.

The proposed Russell Vale UEP is not in the public interest. We ask that you reject this application from Wollongong Coal and recommend a process to close the mine at Russell Vale permanently.

Thank you and kind regards,

Benjamin Luke Gava.