This mine is not consistent with a precautionary approach to us of natural resources and raises significant risks for the present and future communities of both the immediate community and the wider population of Australia. There are also questions around the financial viability and the company’s commitment to deliver real benefits to the local community. THIS I NOT A PROJECT THAT SHOULD BE APPROVED BY GOVERNMENT. Following is an outline of reasons:

1. **Risk to our water supply and Increasing Risk of Bushfires**

Mining will occur in the “Special Areas of the Greater Sydney Water Catchment”, according to Water NSW these areas are,

“The Special Areas cover approximately 364,000 hectares of mostly unspoilt native bushland around the water storages and infrastructure that supply Sydney, the Illawarra, Blue Mountains, Southern Highlands and Shoalhaven regions. Public access and activities are restricted to protect water quality in these areas.”

As public access is forbidden due to the sensitive and strategic importance of these areas it is illogical to allow the expansion of mining. Mine is risky because the seam of coal is being mined underneath two previously mined seams. Wollongong Coal propose to mine a third seam of coal (Wongawilli seam) beneath two previously mined seams. Multi seam mining has scant precedent and the outcomes are difficult to predict. Instability in the overlaying old Bulli seam workings may cause pillar collapse and subsequent surface subsidence of 1 to 2 metres. The land around the proposed mining is unstable.

The proposal states,

“It is noted that large areas of the surface within the UEP Application Area are currently on the verge of moving as a result of previous mining.”

It is described as being in “limiting equilibrium” and still moving, having not stabilised since WCL mined long walls 4, 5 and 6 several years ago. The mine will also drain both surface and ground water from the Cataract Reservoir catchment.

The cumulative affect of the mines operations with drought and climate change, will have. devastating impact to the local ecology and bioadiversity. As the area dries out, it loses the ability to sustain native plants, animals, birds, reptiles and insects in the area. All these things are important to our own survival as we are part of the ecosystem and rely on a functioning environment for our future. In the recent conflagration of 2019-2020 the Cataract Reservoir catchment area was one of the few areas that remained unburnt, if the water is removed from this area, this will increase the risk of fire by making the area even drier and more flammable, this also increases the risk throughout the surrounding area, especially the Illawarra Escarpment.

1. **Relationship to Expansion of Mining Around the Cataract Reservoir and to the west.**

The intention that this expansion is a lead expansion for future expansions reflects poorly on our local, State and Federal Governments commitment to protecting our water supply and habitat in the Greater Sydney Basin.

Damage to other National Parks is already occurring. The Tahmoor Colliery mining near the ancient Thirlmere Lakes has resulted in two lakes being empty for almost forty years. Even though the mining was approved and carried out under “strict regulations", this has not stopped the damage. There is a risk that after the mining has ceased water will flow into the void left by the mining and this could lead to water outflow that could last for generations, 160 years or even in perpetuity. This risk is not worth taking. 3.

The stress, damage and loss of income for individuals and companies from desperate water restrictions due to a depleting and or polluted supply has not been considered.

1. **Impact on Local Population and Environment**

WC is in a densely populated area and residential growth is increasing. There are homes quite close to the colliery and schools within several hundred metres. There will be an exponential increase in coal trucks, noise, particulate pollution and general dust? The increased traffic from trucks moving coal to the Port Kembla Coal Terminal is estimated at seventeen trucks per hour leaving the colliery. This will increase noise, dust and traffic jams, increase damage to the roadways that causes exponential costs in time, money and more pressure on the community.

1. **Questionable Economic Viability and Accountability**

What will the net cost of the project be to the people of NSW. There has been no requirement to internalise the environmental cost of the project and therefore no true Economic viability study has been completed.

The NSW government is yet to determine whether Wollongong Coal (WC) is fit and proper to hold a mining license. WC is no longer listed on the ASE and therefore lacks accountability requirements for ASX-listed companies.

1. **Uncertain Socio-economic gains**

It appears that WC does not pay company tax - it appears to have lost money every year since 2013, resulting in no taxable income and therefore no company tax paid.

How can they expand when they are unprofitable?

WCL’s has a poor track record for safely and profitably operating mines and there are many documented incidents of poor work practices which put employees at risk. The track record brings into question their ability to deliver social-economic gains.

For example in in 2019 WC shut Wongawilli mine after the NSW Resources Regulator identified “significant safety issues”. There was also the incident where a longwall machine was buried in a roof collapse and 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.

Their processes do not suggest they take seriously the best interests of the community or workers

1. **Inter -generational Equity and Climate Change**

The cost of coal mining on future generations is no longer acceptable, especially unless the true environmental cost of the mining and use of the resources is internalised into the pricing of the resource.

Australia is lagging behind international leaders and at risk of a carbon tax being levied on our exports to Europe see (Australian Financial Revie (https://www.afr.com/policy/energy-andclimate/the-carbon-tax-that-will-work-20200115-p53rmk).

1. **Climate Change**

Australia will not meet our targets for the Paris Agreement. The decline in economic activity in Australia due to the COVID-19 pandemic results in lower greenhouse gas (GHG) emissions projections for 2030, although Australia has not implemented an effective climate policy. The Australian government has initiated a “gas-led recovery" rather than a green recovery, and has continued to signal its support for the coal industry. The government has shown no intention of updating its Paris Agreement target nor adopting a net-zero emissions target, with the Prime Minister specifically ruling this out. The Government is focusing on what it calls a “technology neutral” approach, which is contradicted by its focus on gas. Renewable energy investments have dropped to 2017 levels due to the uncertainty in government policy direction. There is a lack of climate action, despite rising climate impacts such as the catastrophic bushfires that enveloped several states in late 2019 and early 2020.

If approved, Russell Vale would be in the top one hundred emitters of Scope 1 emissions in Australia. Russell Vale is a gassy mine and a great deal of methane would be released into the atmosphere during mining, which is a far worse GHG than even CO2.

1. **Cost to Australian Government/Community**

It has been estimated that it would cost $24,000,000 to offset the GHG emissions that Russell Vale will generate.

WC’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 WC pay no company tax, it is unlikely they will contribute towards the cost of abatement.

The objections demonstrate that the proposed Russell Vale UEP is not likely to be in the public interest. Please reject this application from WC and recommend a process to close the mine at Russell Vale permanently