**ADDITIONAL TO IRRM SUBMISSION.**

COMMENTS ON WARWICK LIDBURY’S PRESENTATION DAY 1

Warwick Lidbury said:

*All the coal extracted will be hard coking coal for the steel manufacturing industry worldwide, including the Australian markets if required.*

In all previous applications and approvals at Russell Vale the **coal from the Wongawilli seam has been 30% rock, 30% thermal coal and 40% metallurgical coal.** When did this coal change composition? The FAR also says that there will be up to 200,000 tonnes of reject material a year.

Wollongong Coal (WC) and the FAR gave the impression that all the coal mined at Russell Vale would be sold to their parent company Jindal Steel and Power and used in India. Now he is bringing in the possibility that the coal may be used in Australia.

*The extraction plan will ensure no cracking of the strata, no additional loss of water from the catchment and no adverse effects at all to quality on the surface.*

**There are such a lot of misleading absolutes stated here**, “no cracking, no additional loss of water, no adverse effects” but only if the marginal stable pillars are not disturb and everything goes right. The FAR has stated that there will be subsidence of 35mm to 100mm and if a marginal stable pillar collapses approx. 800mm. **How can anyone say that subsidence of 100mm or 800mmwill have no cracking or no adverse effects**? The FAR has stated **the project will be adding 131 ML/year of ground water and 10 ML/year of surface water,** we do not consider this ‘no additional loss of water’.

WC may require a Surface Water Licence for up to 10.04 ML/year. **They have indicated that it is currently investigating trade options to acquire sufficient surface water entitlements but there are only three possible licences available**, so this is very unlikely as other mining companies will also be trying to acquire these.

In the event that insufficient entitlement can be acquired, they have indicated that it would negotiate a range of alternatives with Government Agencies. **Offsets are not available as there are no like for like options and paying for the water loss for a specific period of time can never compensate for the perpetual damage to the water catchment.**

*This excludes longwall mining and secondary extraction methods within the Russell Vale leases.*

And then immediately says,

*The mine plan has the extraction of 25 metres of longwall in the longwall 6.*

**Sorry there either isn’t any longwall mining or there is.**

*We previously took some product off the ..... last year at the same rate of trucking. We didn’t have any issues.*

What they neglected to say here is that **they had an order placed upon them to remove the illegal stockpile that allowed the same amount of trucking as they are now proposing but they never actually reached that trucking volume.**

The maximum coal trucked in a single day during that removal was on 13/03/2019 and the tonnage was 2769. This can be easily checked by looking at WC’s trucking records on their website.

If the trucks were carrying 35 tonnes of coal each and they were running at 17 loaded trucks per hour that means the trucks only worked for 4.7 hours, not even half a day. **So they didn’t have any problems working less than half a day.** WOW.

*Well, we put that in the application, but that’s our last thing that we would do. The economic benefit of selling the coal as run-of-mine coal is probably the first option, where we can sell it to certain customers as-is without detriment to the price of that product. So we would most probably be starting by selling that run-of-mine coal and assessing the economics as over the five years. Whether it’s even a benefit to put in a ..... processing plant.*

So we are agonising over a coal processing plant that may not be built. WC needs to be clearer on what their primary goal is here.

They **say their first option is selling ROM coal and yet their pit top infrastructure is set up for processed coal and not ROM coal.** They do not even show how the pit top will operate for ROM coal. Surely they are not saying that they will load 3.7m tonnes of coal with tractors at the congested western end of the pit top area? That would be a worse situation than the community has had to deal with to date.

**WC need to provide a truck loading facility for ROM coal** as was promised in the Preliminary Works Project.

**We are commenting on the impacts of the reject material being placed underground but now it is WC first option to have no processing plant and therefore no reject material.**

We as the community cannot accept this, as WC has obtained approval by stealth in previous applications or modifications. **We can believe that WC will not build this plant along with all of its polluting impacts.**

One of WC’s employees Mark Griggs said on Day 2 about placing reject material underground,

*I don’t see that as being a real option anyway. I’ve worked at over 30 underground mines. I’ve never seen it done before, and I know of no place in Australia which puts its washery tailings underground. So my understanding is that all the coal will leave the site as-is, unprocessed.*

**So are to assume that this material cannot and will not be placed underground? Where will it go? There is no other plan to dispose of this polluting reject material.** Is this just another smoke screen? **WC needs to be more definite on what they are actually proposing in this UEP** because we certainly don’t know.

*We’ve done an assessment. We’ve looked at the construction of containers, but we brought in the people that have done all the noise barriers along the main highways in Sydney, and it looks as though it’ll be pre-cast slabs.*

When was this done, obviously just recently? WC just keeps changing things as they go along. The assessment process hasn’t even started and things are changing. **The community need updated infrastructure to lessen the impacts that are being placed on them. The proponent has operated this mine with antiquated infrastructure or no appropriate infrastructure at all.** Now WC wants to change or lessen the infrastructure that they are proposing. It is time to draw a line through this project.

In the CEO’s short 5 minute transcript there are so many unresolved issues and misleading absolute statements that it shows **WC does not have the capacity to even come up with a coherent and specific plan let alone allowing them to experiment with a third seam mining method (without investigating dodgy pillars) in our water catchment.**

Steve O’Donoghue, director of resource assessments

*the other key aspect to the mine is that the pit top area located between the suburbs of Russell Vale and Corrimal. So that is – that’s a key constraint for the area where there’s been residential, I guess, developments around the mine site, and there’s – it’s quite in close proximity to suburban areas, which is a, you know, key constraint for the project.*

It needs to be noted here that the residential areas were established when Gujarat NRE bought the mine in 2004 and when Jindal Power and Steel became major shareholders in the company and changed the name to WC in 2014. **They bought into the Russell Vale mine that is in an existing dense residential area, it didn’t develop around them.** They knew they were also buying into the problems associated with the close proximity of the residential areas. **This mine is located in a residential area and should not be approved in this the 21st century.**