

Russell Vale_PAC_Dec_2015_Wollongong Coal UEP

Thank you commissioners, for this opportunity.

It is deeply disturbing that Sydney is the only major city in the world to have longwall coal mining in its drinking water catchments, a fact acknowledged in a 2014 Report of the Chief Scientist of NSW ⁱ and that expansion projects like this UEP in these water catchments continue to be seriously considered. I object to an approval for this proposal.

The environmental philosopher, Robert Frodeman,ⁱⁱ has argued that beyond the technical and scientific arguments, mining controversies are unavoidably situated in a moral landscape, and that discourses around them should consider our heartfelt concerns. Decisions should be reasoned judgments based on ethics and commonsense and should reflect what is for the greater good. It isn't ethical or common sense to jeopardize drinking water forever by mining coal beneath it now.

Coal mining in water catchments does not have a legitimate social contract, as the community knows it isn't right. But not everyone feels comfortable objecting in this PAC arena, and the silent majority leave it to the those who are here today. There are significant barriers to wider participation in this type of formal process. Nonetheless there would be many more doing it if the damage being done was known and well understood, instead of being under the public radar. It is locked away, out of sight, invisible and out of mind. There is also the matter of public trust, many of the wider public actually want to believe that governments, and public officials like yourselves would always put the sanctity and safety of drinking water ahead of desperate and short term efforts to suck a few dollars out of the ground by mining coal.

There is a particularly outstanding admission made in the Russell Vale Environmental Assessment that reveals the proponents attitude to drinking water catchments. Buried deep in the detail of the Report, it states that economic costs of subsidence are expected to be minimal, because
“the mine is mostly located under the Sydney water catchment which has limited economic assets that could be damaged by subsidence”. That is regarding water, the chief asset of a dam catchment, as though it is worthless! ⁱⁱⁱ

I urge this PAC to carefully take account of the arguments of the Protect Sydney's Water Alliance, and that of the NSW Nature Conservation Council, around the lack of technical and financial capacity of the mine operator in this instance, and its past failure to meet existing conditions of consent for environmental protection. ^{iv} Given the apparent precarious current and future position of this miner, the issue is raised as to what capacity they will have to meet best practice environmental management and post mining remediation obligations.^v

I am a member of the Georges River Environmental Alliance, and presented a first round of arguments against the Wollongong Coal UEP to the PAC in February 2015, ^{vi}

Specifically in regard to this PAC review, I would like to add the following observations and arguments;

Any surface water loss from this expansion proposal is unacceptable. Ordinary consumers would be expected to pay for their water use. Ethically then whatever water is lost from a drinking water catchment, as a result of coal mining, should be costed at market rates and paid for, by the miner. This approach comes closer to representing the true cost of mining.

With regard to this proposal, when water disappears from shattered stream beds and desiccated swamps, through the multiple collapsing goafs of dodgy multi-seam mining, polluted by salts and minerals on the way, just where will it end up? It probably won't return dutifully via deep and mysterious groundwater connections to end up in the dam, its original destination, but rather be dissipated elsewhere.

The Proponent's Groundwater Report suggests that there could be a 4 ML loss per day of pristine water from streams in the Cataract Dam catchment, but that only 0.041 ML/day will be lost from the catchment. This seems unreasonably optimistic. The modeling suggests a mine inflow of 3.2 ML/day which will be pumped back out to the surface, and be transformed into a waste stream heading down the Illawarra escarpment, towards the Pacific Ocean. This sounds like a wasteful and unethical squandering of the water resource.

Damage to upland swamps too, remains an unacceptable scenario. There is no feasible and acceptable off-set for upland swamps in drinking water catchments. By definition they are a rare commodity and nothing else can do what they do beautifully; ecologically function, to deliver water reliably, even in dry times. Wollongong Coal's UEP that presents an admitted risk to swamps should therefore not be approved, or if it is, the approval should be outcomes based, and the mandated outcome should be nil damage to swamps, with transparent reporting, and enforceable penalties guaranteed. All of that is so unachievable, that it is preferable to recommend non-Approval.

It is disappointing that the Dept of Planning and Environment has again recommended an unjustified approval, and in so doing has shown disrespect to the PAC by ignoring the PAC recommendation that a review panel from government agency personnel be convened to review the risks of the proposal. It has instead chosen a panel, which mostly come from mining industry consultancies. There is no appearance of impartiality and public confidence is lost when such contradictions occur.

The DoPE has acted with further inexplicable arrogance in ignoring the Federal Government's Independent Expert Scientific Committee that found there was the potential to cause a leakage of the entire stored waters of the Cataract Reservoir, as a result of proposed new mining. ^{vii}

With so much not known, contested scientific evidence, and so much at stake, in this case the safety of Cataract Dam, a mining approval should not be granted. The Precautionary Principle, promoted by the Southern Coalfield Inquiry of 2008, and then upheld by the BSO PAC, should be applied. ^{viii}

Sharyn Cullis, [REDACTED], m [REDACTED]

Secretary, Georges River Environmental Alliance, Community Representative, Bulli Seam Operations Community Consultative Committee.

End Notes

ⁱ N.S.W Chief Scientist and Engineer, On measuring the cumulative impacts which impact ground and surface water in the Sydney Water Catchment, May 2014

http://www.chiefscientist.nsw.gov.au/data/assets/pdf_file/0007/44485/140530_SCA-Report-Final-Combined.pdf page A-27

ⁱⁱ R. Frodeman, "Geo-Logic", 2003, Albany, N.Y: State University of New York Press, page 8.

ⁱⁱⁱ Russell Vale EA

<https://majorprojects.affinitylive.com/public/daa0eeb82d16378a08a89e1c395587d5/4.%20NRE%20Underground%20Expansion%20Project%20-%20Main%20Report%20-%20Part%20D.pdf> S 28.2 Page 503-4

^{iv} <http://www.nature.org.au/news/2015/07/new-report-raises-concerns-wollongong-coal-cannot-be-trusted-to-mine-in-sydney-s-water-catchment/>

^v Since I am a member of the Bulli Seam Operations Community Consultative Committee, I am aware of the far higher and more explicit standards that the EPA is imposing on South32, with regard to wastewater discharge quality. Should any approval take place such standards should also apply to Wollongong Coal.

^{vi} The objections of the Georges River Environmental Alliance to the February PAC were in summary that;

The PAC should **reject** the UEP based on the current Longwall Mining Layout as the predicted swamp **impacts** and the degree of **uncertainty** about the **risks to** Cataract Dam was and is **unacceptable**. Since swamps are rare, any off-**set** of 'like for like' is not **feasible**, and alternative '**un-like**' **offsets unacceptable**. **Cumulative impacts** to Sydney's water supply of multiple approvals were ignored and should be considered.

Economic benefits, were over-stated and of less social value than the predicted losses and unknown risks of this proposal.

^{vii} IESC Report, IESC- 2015_ 065, Russell Vale Colliery Underground Expansion Project, Advice to Decision maker on coal mining project, February 2015.

At:<http://www.iesc.environment.gov.au/system/files/resources/fe65291d-c1ac-49da-99b6-27d1c36d54c3/files/iesc-advice-russell-2015-065.pdf>

^{viii} 'Impacts of Underground Coal Mining on Natural Features in the Southern Coalfield Strategic Review' July 2008,

<http://www.georgesriver.org.au/IgnitionSuite/uploads/docs/Impacts%20of%20Underground%20Coal%20Mining%20on%20Natural%20Features%20in%20the%20Southern%20Coalfields%20-%20July%202008.pdf>

BSO PAC Report, July 2010,

<https://majorprojects.affinitylive.com/public/4acfbefb562c74c619405e3b4b37d00f/PAC%20Report.pdf>
