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To: [IPCN Enquiries Mailbox](#)
Subject: IRRM Comments on Additional Information
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Attachments: [IPC Additional Information IRRM Comments November 2020.docx](#)

To Whom it May Concern.

Illawarra Residents for Responsible Mining would like to make comments on the additional information that was posted on the IPC website for the Russell Vale Underground Expansion Project.

Please find attached.

Regards Gavin Workman

IRRM RESPONSE TO ADDITIONAL INFORMATION.

INADEQUACY OF REHABILITATION COST

The Department of Planning Industry and Environment and the Resources Regulator provided clarification about the amount of rehabilitation bond being held and whether there was any additional cost.

Curiously they both said the same thing, that the \$12.5m being held was sufficient to cover the rehabilitation cost at Russell Vale. Unfortunately this is not correct; there is no allowance for the treatment of the adit water. In early 2050 the Russell Vale mine will fill up with water and that it will flow out of the adit at a rate of 300,000 litres a day. Wollongong Coal's rehabilitation sum should cover this mine water and not the NSW taxpayer.

APPROVAL RESPONSIBILITY

DPIE said in their response *"A financial analysis of a project must stand alone, noting that NSW planning approvals run with the land, not the applicant"*. It is not possible to remove the proponent from the conditions and promises of a project. The mining industry is self-regulated and there are mountains of evidence that Wollongong Coal is financially compromised and have been serially noncompliant.

INDEPENDENT ADVISORY PANEL FOR UNDERGROUND MINING ADVICE November 2020 LONG TERM PILLAR STABILITY

Wollongong Coal and DPIE have led the community to believe that the bord and pillar mining method proposed was long term stable but now from the comments *"No respectable pillar design method can guarantee permanent pillar stability"* it is obvious there is no such thing. So some years in the future the pillars will fail to some degree in all three seams at the Russell Vale. It is beyond our comprehension that further mining should even been considered here. It will only create problems in the future that taxpayers will have to bear, like the thousands of legacy mines around Australia.

This is not the safe mining method we have been promised by Wollongong Coal.

WONGAWILLI SEAM ROOF STABILITY

The part above the working roof of the Wongawilli seam consists of uneconomic high ash coal plies and claystone bands. These strata are of poor quality and create problems for calculation assumptions for bearing and stability.

It appears as if the IAPUM is concerned about the Wongawilli seam coal properties. The Wongawilli seam is up to 9-10m thick and the bottom 2.5-3m is mined. This means there is 6m plus of poor quality coal above the mined goaf. If longwall is used there is no necessity to support itself because the overburden collapses into the goaf but with bord and pillar the roof or overburden is required to stay in place. This proved to be a problem at the Wongawilli mine and they had to eventually abandon it because of safety concerns.

WONGAWILLI SEAM ROOF PROPERTIES

There appear to be concerned about the properties of this remaining roof or overburden coal above, whether the coal is able to support the loads imposed upon it by the pillars. Will the pillar punch through the or into the overburden and no doubt the shear properties at the junction?

INACURATE SUBSIDENCE PREDICTIONS

The IAPUM advice points out the subsidence are far greater than originally stated by Wollongong Coal or DPIE. We were told that general subsidence would be negligible 35-100mm but now we find they are actually up to 300mm. We were also told that if there was to be a pillar failure the subsidence would be 800mm but that has now been revised by the IAPUM up to 1300mm. This substantial increase in subsidence has repercussion on water loss and creates problems for swamps.

The area above the Russell Vale has been subject to years of mining subsidence. The swamps that remain have survived this ground movement and are under great stress. Any further subsidence, no matter how small, could put them under greater stress and even fracture them.

This is not the safe mining method we have been promised by Wollongong Coal.

CONDITIONS PLACED UPON SUBSIDENCE

The IPC requested condition wording that would be placed upon the proponent for subsidence but this is should be seen as not practical for Wollongong Coal. The mining industry is self-regulated and there are mountains of evidence that Wollongong Coal is financially compromised and have been serially noncompliant.

ADDITIONAL INFORMATION

There should be no necessity for IPC to obtain additional information in order to make a determination. DPIE has advised that the project was approvable, talked up the project to everybody and obtained advise from the IAPUM just a month prior. Surely there is insufficient information the project should be rejected.

The current IAPUM advice just points out that there are more outstanding and conflicting information out there.

The IPC had the email addresses of all concerned groups and individuals that were interested in the project and yet they were not contacted. We can only assume that IPC was trying to bury the information because this is certainly not a transparent process. We think the IPC has handled this matter poorly, certainly worse than the old Planning Assessment Commission model.

Thank you for the opportunity to make a comment on this additional information.
Illawarra Residents for Responsible Mining.