

**From:** [Shirley Gladding](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Submission re Wollongong Coal Ltd's Revised Underground Expansion Project for Russell Vale (Major Project 09=0013)  
**Date:** Tuesday, 27 October 2020 2:39:23 PM

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I object to the Wollongong Coal Ltd's Russell Vale Revised Underground Expansion Project (Major Project 09-0013)

I live locally, in Fairy Meadow, two suburbs from the coal mine. I have watched with much concern the history of the Russell Vale mine evolve over recent years, particularly from the environmental aspects of mining in our drinking water catchments and also grave doubts about the integrity of Wollongong Coal Ltd.

I fail to understand how further mining in the catchments can be considered, when security of our drinking water should be of paramount importance, especially considering the threats facing us with climate change. If this project goes ahead, there will be further loss of ground and surface water from the Cataract Reservoir and catchment, in addition to losses from previous mining damage. The accumulative impacts of water loss in the catchments should be taken into account.

Furthermore, discharge water is contaminated with salt and heavy metals. Whilst Wollongong Coal is meant to manage and treat the outflow from the mine for 10 years after the project is finished, will they uphold that commitment? And what happens after that? We are the driest inhabited continent on earth. Surely, water must be considered our most precious resource and take priority over mining?

The loss of surface and ground water in the catchment will also impact on the biodiversity of the area, especially as effects of climate change take hold. As the area dries out, bush fire risk will be greatly increased. With threats of more severe droughts possible in the future, we must protect our fauna and flora, because they are vital in balancing nature and the ongoing sustainability of our planet. Dead swamps cannot be fixed and offsets are not an answer.

The bord and pillar method to be used will be beneath 2 existing tiers of long-wall mining and I believe there is little precedent for 3 tier mining. If the project proceeds, a lapsed approval for longwall mining will also be reactivated, enabling 25m of longwall mining close to upland swamp CCUS4, to remove the abandoned longwall machine in longwall 6! With uncertainty about impacts, how can this be allowed in the catchments?

I have read, with alarm, the recent report from the meeting on 13<sup>th</sup> October with the Resources Regulator and IPC and the comments that were raised about the marginally-stable standing pillars in the Bulli Seam. **An extract from an SCT report, quoted by Dr Li on page 7 'The Bulli Seam in**

**the general area of the proposed mining was mined at a time when there was no legal requirement to keep “accurate” mine records, A small area of marginally-stable standing pillars in the Bulli Sea is known to exist to the east of Mount Ousley Road. Although this area is shown on the mining plans (– Dr Li comments, “this is important” –) there is uncertainty about whether there may be other areas marginally-stable pillars elsewhere across the area given that most of these workings are now inaccessible’. On page 8, Dr Li goes on to say ‘Importantly, without a reasonable understanding of this key risk factor, we are in the dark making decisions in relation to Russell Vale Colliery’s proposed revised underground expansion project’.**

I was subsequently shocked to learn these concerns will not be addressed in the assessment process. Instead, the Planning Dept has recommended that Wollongong Coal be allowed to investigate the subsidence risk post approval! We are talking here about possible further risks in our drinking water catchments and a company that has a history of non-compliance.

This confirms worries I have about this whole process. We are not supposed to challenge whether Wollongong Coal Ltd is a fit and proper company, when considering this project, yet there is a trail of unfulfilled obligations, going back years. Where is the precautionary principle? Surely this needs to be applied, especially when conflicting with security of our drinking water.

As if these concerns are not enough, there are still other considerations. Climate change constantly comes to mind, when thinking of this local coal mine. Russell Vale is a gassy mine, putting it in the top 100 emitters of Scope 1 emissions in Australia, if this project is approved! A large price to pay for a relatively small amount of coal, all intended for export. And it baffles my why we don’t have to take into account Scope 3 emission because the coal will be burnt overseas. It will still be the same planet and can still impact on Australia!

Living locally, I am aware of the increased traffic, due to the 34 trucks (17 each way) expected on our roads, adding to traffic congestion and pollution. Being close to the community, I am also aware of health concerns regarding particulate pollution, both from the site and also from the trucks.

I get frustrated, as we constantly hear we need projects like this for jobs. Yet demand for coal is rapidly decreasing. Wollongong Coal does not supply our local steel works and anyway green steel is now rapidly becoming more viable, as too the demand overseas for imports of green hydrogen. The world is changing and we must change with it. I don’t think it is fair on workers to keep striving to keep a dying industry going, when we need to be a lot more proactive in creating new industries, beneficial to the planet and providing longer term, satisfying jobs for the work force.

Wollongong Coal’s financial situation looks dire, with reported liabilities

outweighing its assets by approximately A\$1 billion and is no longer listed on the Australian Stock Exchange, relieving the company of basic accountability requirements. Meanwhile, the fit and proper test on the company by the NSW Government has dragged on for a few years now, despite outstanding debts and unmet compliances from previous mining. How can they be responsible for a new project and on-going further obligations?

We must protect the drinking water catchments and our environment for the challenging future we have ahead. This project would conflict with that need.

I ask that Wollongong Coal's Revised Underground Expansion Project is rejected.

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