

**From:** [Undermined Inc](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** IPC Submission Opposing SSD 8194  
**Date:** Tuesday, 15 December 2020 3:38:48 PM  
**Attachments:** [pastedGraphic.png](#)  
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Dear Independent Planning Commission,  
Please find the Undermined Inc submission opposing SSD 8194.

SUBMISSION 2020 December 15

INDEPENDENT PLANNING COMMISSION SSD 8194  
Presented 2020 December 3 Thursday 2.57pm Speaker David Eden

I, David Eden, declare I am a Community Member of the Independent Hearing Assessment Panel for the Wollondilly Local Government Area.

I also declare my views submitted on this Dendrobium Extension Project SSD 8194 are not part of a Wollondilly Local Planning Panel.

I am President of Undermined Inc, a community action group addressing damage caused by longwall coal mining in Wollondilly Shire. Undermined campaigns for remediation, repair and restoration of local creeks, rivers and lakes impacted by mining. Of particular concern is the water loss in the five Thirlmere Lakes coinciding with the closest approach of longwall coalmining by Tahmoor Colliery in the years 1997 to 2001.

I speak for Undermined Inc and for the community affected by coalmining. What we have learnt at Thirlmere Lakes leads us to object to further environmental damage. We are opposed to the continuation of coalmining and the Dendrobium Extension Project.

**Sustainability** is the key issue that you, the Independent Planning Commissioner, must address. In this submission, Undermined Inc explains the information based on **science** that leads to only one conclusion: this application is not sustainable. Were you to allow the project to proceed, even with conditions, the harm the project would do to the environment, will make living conditions unacceptably worse and for some people, unendurable.

I am showing you a video produced by NSW Nature Conservation Council (NSW NCC) and Chris Jonkers. The video shows you the result of coalmining under upland swamps, the same as proposed by South 32 in this project.

Video and KeyNote presentation is attached separately. The following quotation from the Director, South East Branch Biodiversity & Conservation Division, Environment, Energy and Science, part of NSW DPIE, explains why we are concerned:

“In its current form the proposed mine layout remains likely to have a significant impact on threatened species and ecological communities and in our opinion, does not satisfactorily demonstrate the “avoid” principle has been met.”<sup>1</sup>

<sup>1</sup> Michael Saxon Director, South East Branch Biodiversity & Conservation Division Environment, Energy and Science, 9 September 2020, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-8194%2120200910T003952.195%20GMT>

Why do I speak strongly about the environment, living conditions and the community? It is because to me, nature is beautiful, complex, wonderful to understand and a delight in

which to share experiences. South 32 and Illawarra Metallurgical Coal must not be allowed to decrease the biodiversity of the natural environment. That this project of theirs makes us, the community poorer, is also an injustice.

I start on personal note. I have lectured in Statistics to first year Business students and in Operations Research to final year Engineering students at the University of Technology Sydney. I am going to use numbers.

I and my family were burnt out at Oakdale on 2019 December 6 by the Green Wattle Creek bushfire. **The 1 C temperature rise the World is already experiencing is the most we can sustain.**



Our farm was a refuge for us and wildlife in 2019 December because we wet everything down to save our farmhouse, sheds and gardens from the fire we knew was coming. In the months following the 2019 fire, we watched as wombats, an echidna, birds, and other wildlife came to our place for food.



What we don't see are native bees, small birds like the superb fairy wren who depend on *Bursaria spinosa* for protection because most of our tree hollows were burnt and all of our undergrowth was reduced to, at best, burnt black sticks.

My personal experience (shared by other people) is that **the worldwide 1 C average atmospheric temperature rise we had in 2019 is no longer endurable**. It is not because I am a man, Australian nor that I have been an engineer that we survived the 2019 Green Wattle Creek fire. It was with the help of the Fire Services, neighbours and good luck that I have survived to say: “Now is the time to act”. We must act now to limit how much more unendurable our climate is becoming.

We had 19 years to make better preparations for the 2019 fire because we were burn out in the 2001 fire. We took the best advice we could to protect our farm and environment last time. Now the best advice is to pack up and leave. But there is no advice on where we should go, no travel advice for the greater gliders who might have returned to the bushland left on our farm.

In 2019 December and 2020 January we had the hottest days ever recorded in our part of Wollondilly.

In 2020 February at our place in Oakdale, we had 321 mm rain, the wettest day ever over the 25 years we have measured daily rainfall.

I quote the IPCC reference explaining **increased weather variability** is due to Climate Change: Page 3 Local Climate Change, increased variability, from IPCC 2018 Chapter 3-1 Observations: Surface and Atmospheric Climate Change, pages 299 to 303 , especially Figure 3.38 6 and Table 3.6.

[www.ipcc.ch](http://www.ipcc.ch) > site > assets > uploads > 2018/02 > ar4-wg1-chapter3-1

[www.ipcc.ch](http://www.ipcc.ch) > site > assets > uploads > 2018/02 > ar4-wg1-chapter3-1PDF

Now, while we improve our property to increase our resilience to the even worse effects of increasing climate change, is this Planning Commission able to tell me and my family how much more Australian, and resilient and sustainable we should be?

There are **no conditions** in the 52 page Department of Planning Industry and Environment recommended “Development Consent” under Section 4.36 of the Environmental Planning and Assessment Act 1979 protecting the people from a hotter, dryer, more variable world subject to worse weather extremes than we have now.

The \$0.04155 per tonne of coal to be paid as a community enhancement contribution appears inadequate to protect people affected by climate change. It would not even pay for the carbon capture and storage of the greenhouse gasses emitted mining the coal. In the overall picture, the total contribution has the scale of an accounting error.

Undermined submits that longwall coalmining is completely unacceptable below natural areas. Longwall coalmining depressures the regional groundwater system. The Dendrobium Extension Project cannot proceed with conditions aimed at limiting subsidence as any mine subsidence will dewater creeks, aquifers and surface drainage.

**Section 4.15(1)(b) & (e), Environmental Planning & Assessment Act 1979: The likely impacts of the TSCP on the environment and heritage, and the public interest.** It is well established that, when determining a development application for a major fossil fuel development such as the Dendrobium Extension Project, the IPC has a duty to consider the likely direct and indirect impacts of the development on climate change. It is also well established that a consent authority is required to consider these impacts, along with the likely impacts of climate change on the development, as a component of the principles of Ecologically Sustainable Development (ESD), when considering whether the development is in the public interest.

We have known how and why our climate is warmed by the atmosphere since Joseph Fourier in 1824 realised the Earth is kept warm by its atmosphere. Seventy years later Svante Arrhenius measured how carbon dioxide influenced the greenhouse effect. Arrhenius warned that if atmospheric carbon dioxide CO<sub>2</sub> concentration increased by 50%, the planet would experience a warming of between 5 C and 6 C. His article of 1896 also identified human industrial activity as the main source of new CO<sub>2</sub> into the atmosphere. I give you this reference:

<https://www.bbvaopenmind.com/en/science/leading-figures/svante-arrhenius-the-man-who-foresaw-climate-change/>

Undermined Inc submits climate change worldwide is now so urgent, the Dendrobium Extension Project must not be allowed to proceed. Just 1 C average atmospheric warming, though small, has been sufficient in NSW to demonstrate our local and planet wide susceptibility to record hot days, longer hot spells, dryness, longer droughts, more intense and longer bushfire seasons. From a social perspective, the evidence is that same 1 C temperature rise has been too small for State and Australian governments to act decisively to reduce climate change. This does not mean you who have to be independent of political ideology can not make the right decision.

Climate change increases the energy trapped in the atmosphere as Fourier thought and Arrhenius measured. Undermined Inc submits our knowledge of physics, engineering and statistics implies increased energy in the atmosphere increases climate variability on the world scale and the variability of weather on a local scale. Increased climate variability is reported by the IPCC, reference: <https://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg1-chapter3-1.pdf> pages 299 to 303.

At the local scale, climate change will increase our susceptibility to less rainfall. Undermined Inc submits the climate changing and the Dendrobium Extension Project dewatering the local environment is a matter to be considered by the consent authority under Section 4.15(1)(b) & (e), Environmental Planning & Assessment Act 1979: The likely impacts of the Dendrobium Extension Project on the environment and heritage, and the public interest.

The Australian Bureau of Meteorology graph referred to in our references shows rainfall for our East coast has been decreasing by 30 mm per decade since 1970. Undermined Inc submits this suggests that our local rainfall could well be decreasing.

A small decrease in rainfall or instead an increase in climate induced evaporation such as we have had during the recent drought and extremely hot days, will each have a similar effect. We have both [a decrease in rainfall and an increase in climate induced evaporation] and coupled with the predicted gross dewatering of subsided and cracked land, there will be irreparable effects on wildlife and biodiversity.

Undermined Inc submits our environment has to be protected in a sustainable way for the benefit of future generations. Therefore, the Dendrobium Extension Project is not sustainable, does not safeguard the natural environment, will actively destroy the physical environment and render local ecological communities unsustainable.

Undermined Inc submits the Dendrobium Extension Project unduly considers the short-term economic benefits to mine owners South32 and Illawarra Metallurgical Coal, mine employees and NSW Government royalties at the cost of our publicly owned environment.

In a changing world, Port Kembla steelmakers will continue to struggle, competing with

old technology. Help them avoid a stranded asset. Electric arc steelmaking using renewable electricity is available now. The Gupta Family Group, Liberty Steel proposed last September to consider using electric arc steel making at Whyalla. I remember designing a pollution controlling hood to collect the gasses emitted by such steelmaking at Comsteel in Newcastle in 1972. It will be easier now that renewable energy is more economical.

If BlueScope Steel has continued to favour blast furnace steel manufacture rather than changing with the times, we in the community should not have to pay the environmental cost of damaged water storage, environmental destruction, the existing air-pollution at Port Kembla and potential future job losses as BlueScope Steel belatedly accepts the inevitability of climate change and modern methods of making steel.

Climate change is scientifically well understood. The urgent need to reduce carbon dioxide and methane emissions from coal mining is well understood. The decision against the Rocky Hill Coal Mine by the Chief Judge in the New South Wales Land and Environment Court:

<https://www.caselaw.nsw.gov.au/decision/5c59012ce4b02a5a800be47f>

is directly relevant to the the Dendrobium Extension Project. Paragraphs 422 to 556 of Chief Judge of the Land and Environment Court Preston's judgement accepting the evidence of Professor Will Steffen on climate change clearly set out the reasons the Dendrobium Extension Project cannot be approved.

Greenhouse gas emissions from this project will increase the risk of bushfire, drying and the incidence of extremely high temperature days so much so that the Dendrobium Extension Project should not proceed, because damage to our local environment will be unacceptable.

Undermined Inc submits the IPC must act on the scientific evidence. We say current scientific knowledge should outweigh popular, unrealistic fantasies that a cheap, affordable standard of living will come from more coal mining.

You, the IPC can act with the best certainty available now and be confident when you refuse this SSD 8194 **not mining coal under water catchments is what the current planning legislation requires.**

We are rebuilding houses after the 2019 and 2020 bushfires with higher Bushfire Attack Levels, with higher insurance premiums and with intentions to be more resilient next time. We are planting trees to replace the century old trees that died in the drought. We are adding to our water storage and we are installing more photovoltaic solar panels for energy sufficiency after the next bushfire.

Current practice might be that mitigating climate change is up to the people immediately affected but this does not affect all people equally. It would be more equitable if people with limited finances were helped with higher insurance premiums for the inevitable increase in the risk should not enough be done about climate change.

Will the IPC recommend environmental protection if you do approve this application or does this IPC allow that people in the community will have to work it out for themselves?

At the University of New South Wales in 1970 when I was studying for my Masters degree in Business Administration fifty years ago, the University asked Rod Carnegie to give a

two hour lecture on business strategy. He, who later became Sir Roderick, a Director of ConZinc RioTinto a business leader and titan of industry. He described the innovations adopted then to get the World's biggest copper mine on Bougainville up and running. One innovative idea was to involve the people living on Bougainville by giving them jobs and shares in Bougainville Copper.

My eldest brother was a Mining Engineer working there. My brother had described to me mine waste ("tailings" is the word used by mining people to make it sound better) was dumped into creeks at the mine site so it would wash down to the sea. My brother said that downstream where people lived on riverbanks, the rivers were "30 feet", 10 metres above their houses.

Here was my chance to ask a Company Director about damage being caused to the environment. Do you know that 50 years ago, I knew that if I suggested the environment was worth considering, I would be shunned? I was in a room full of emerging leaders, yet because I did not want to lose work in future, I was not brave enough to ask how indigenous people would feed themselves. I am determined enough now to understand how important it is to avoid obvious environmental damage even if other people might prefer to consider fixing the damage some time in future.

What can we learn from this? CRA and Bougainville Copper lost the World's biggest copper mine - it was a war zone and it is now just rusted machinery. The environment will get you in the end - the environment is what we live in. We have to **deal with climate change scientifically**. Because climate change is a serious problem with serious consequences, like the Covid19 pandemic, let us learn from our experience managing the Covid19 pandemic.

In both Australia and New Zealand we have followed scientific advice on how to deal with a pandemic. It has not been acceptable to politicise preventive measures to Covid19 (such as mask wearing according to which political party a person might belong to). This is one important factor in the fewer deaths from Covid19 in the Southern Hemisphere compared to the United States of America.

Refusing the Dendrobium Extension will be a difficult decision because the Department of Planning Industry and Environment has already assessed it as approvable. It will be a difficult decision because acknowledging that the effects of climate change are not repairable will be difficult. Jobs will be lost or at least some of the jobs people do now like digging up coking coal will not be as well paid. On the other hand, people will be able to move into more sustainable jobs that do not pollute the environment as much as mining coal and steelmaking does. You might even save the steelmaker downstream from investing in a stranded asset.

Because this Independent Planning Commission is made up from educated, professional and skilled people, you will be able to scientifically justify the conclusion you reach from the scientific information already presented to you. I ask you to contemplate for a moment how you feel about this project proceeding or not proceeding. Should you have a feeling one way or the other, you might find more facts scientifically justifying the way you'd like to feel. The evidence is that well educated and skilful people write better justifications for their conclusions. Fewer than half the people who think they are dispassionate and impartial change

their minds when presented with new information.

Can the Independent Planning Commission tell us how much more water to store to save us from bushfires, how many more trees to plant to capture and sequester carbon, how much more resilient we need to be and how much more firefighting we should be prepared to do?

We at Undermined Inc ask that you refuse the Dendrobium Extension Project Application State Significant Development 8149.

I recognise the traditional owners and custodians of the land, air, seas and rivers of Australia. I pay my respects to Aboriginal and Torres Strait Islander elders past, present and emerging. I aspire to learn from traditional knowledge and customs so we can live together sustainably, protecting our environment and cultural heritage.

Regards,  
David Eden  
President, Undermined Inc  
220 New Jerusalem Road, Oakdale 2570