

**From:** [Fiona Bullivant](#)  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Tahmoor South Coal Project (SSD 8445)  
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Thankyou for the opportunity to address the additional information. This a personal submission from Fiona Bullivant.

Ph [REDACTED]

I support the Tahmoor South mining proposal, to provide coking coal for steel making whilst greener options are concurrently developed. I am reassured that the company understands that greener options are the direction that must be taken and that this proposal is a transition whilst greener options are developed, in addition to the commitment to reporting on and implementation of any viable options for further green improvements available in the interim.

I am also reassured that some offsetting has been committed to, and encourage the Company to further explore offsetting options where possible. I would like to encourage these green energy offsetting options, or indeed regenerative agricultural practices or the like, be added to the proposed future report, after all, it is a Global Greenhouse problem, and solutions to reduce overall Greenhouse Gases may be more economically viable outside of the mine itself. If on site measures do not prove viable, that does not rule out the industry assisting with other cost effective measures off site, to remediate the planets greenhouse gas problem.

I live locally, and am an environmentalist at heart, but acknowledge my need to utilise steel in the buildings, roads and modern existence that I use in my every day life.

The reason that I support this Tahmoor South mine proposal, is because it is a far more favourable option both GHG wise and other factors when compared to that proposed by Dendrobium as a source of local coking coal.

In terms of the numbers in the comparative GHG table, the Tahmoor South proposal does not compromise the Upland Swamps of the Metropolitan Special area the way that Dendrobium does. It is not plagued by the Scientific uncertainty of the volume of water loss from the catchment areas that Dendrobium is. Undermining such swamps would crack and dry them, leading not only to them ceasing to be carbon sinks, but to them becoming GHG generators themselves, creating further emissions and making them more prone to bushfire, (more GHG emissions), none of which were accounted for in the Dendrobium proposal. **The absence of such conflict of land use and environmental GHG release from subsidence impacts on such pristine Swamp areas and water loss offsetting for damaging Catchment should be considered a benefit of the Tahmoor proposal.** The Tahmoor South proposal is far preferable to the Dendrobium proposal, on GHG grounds if these are taken into account. I consider these surface effects to be directly attributable to mining.

Often these proposals are considered in isolation, but that makes no sense to me. As we need to have access to coking coal locally, it should be in the area that is most compatible with other requirements. I'm a taxpayer, I don't care who owns the company that extracts the resource. It's about the least damaging option to obtain that resource. Urban development and coal mining can occur, in sequence. Mine first, develop second. This is achievable in the Tahmoor South proposal if further urban development rezonings are not approved until subsidence has ceased. Urban developers may have speculatively bought land at their own risk in this area, and may have local member of parliament friends, but

this should not impact the outcome, as that land has not yet been rezoned. It can wait until the coal is extracted. I consider the Metropolitan Catchment areas should be the priority here, both for their Potable Water supply use and for Ecological and GHG reasons, so to my mind, refusal of the Dendrobium proposal, and approval of the Tahmoor South proposal in its place would be the preferable option. No other countries undermine their city's water supply. To me, the preferencing of the Tahmoor South proposal over that of Dendrobium makes both ecological and economic sense. The Tahmoor South proposal is largely under areas that have already had modification by humans. Both low density urban and rural uses are prevalent. These are, by the most part, not pristine areas being impacted. Whilst there will be some damage to existing houses and assets, this has been mitigated by Simec, by the reduction of the Longwall plan (further reducing GHG), and the remaining impacts will be dealt with under the Mine Subsidence legislation.

The Dendrobium proposal, in comparison, undermines habitat that is pristine and undisturbed, which I find unacceptable. Damaging such pristine ecosystems must surely lead to more GHG impacts from the surface damage, and full length seam cracking, to that of an already disturbed and human influenced rural and low density urban area. The GHG table does not take this into consideration. Surface effects and GHG emissions due to damage to ground and vegetation must surely be more severe where the vegetation is more dense, ie the Catchment lands?

The Dendrobium proposal compromises the water supply for the Macarthur, Illawarra and Greater Sydney Region. Ecologically the Dendrobium proposal is far more damaging. Attempting to offset this damage by Dendrobium, was the proposal for a substitute desalination potable water supply, which would further increase GHG emissions (grossly underestimated in the Dendrobium proposal and GHG figures), as it is energy intensive. Dendrobium also did not consider that desalination happens at sea level, and all water produced by it would need to be pumped back up hill, further increasing GHG emissions, as the current water catchment and potable water supply is perched on an escarpment, and largely gravity fed from the Upper Nepean dams all the way to the household taps. This GHG intensity of offsetting the catchment impacts were not understood, and grossly underestimated in the Dendrobium proposal.

Tahmoor South has none of these complexities, and does not require offsetting of impacts upon the potable water supply for the Sydney region, because it does not create such impacts or associated GHG emissions. As these GHG emissions were almost entirely overlooked by the Dendrobium proposal, this has comparatively disadvantaged the Tahmoor proposal, when comparing GHG numbers. South32 unfairly omitted these impacts. Tahmoor South, who likely did an honest appraisal of their emissions, and does not have those additional GHG conflicts of permanent loss of an unknown but significant amount of our vital public drinking water supplies, comparatively looks worse due to the transparency of their GHG situation, versus the proposal produced by their competitor, which was a poorly thought out submission and possibly outrightly dishonest in terms of GHG calculations.

In addition to this, I would like to outline the ethical responses of these two competitors. South 32 made little to no concessions, no GHG offsetting, and at the same time was signing agreements with urban developers, sterilising coal resources under future proposed urban development areas of Wilton and Menangle, further preferencing the proposed undermining of our Catchment. In contrast, Simec significantly reduced longwalls to mitigate subsidence impacts on the urban areas, has chosen to offset some of its GHG with a solar farm, has existing flaring and generation in place and has committed to continue the same, and made a huge donation to the community after the Bushfires.

Which of the two do you believe deserves the social licence to operate?

Regards  
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