

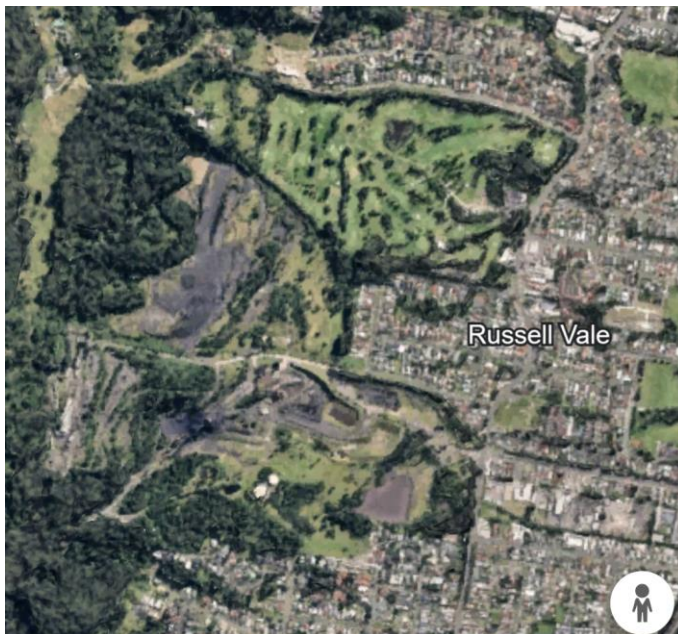
Submission on MP09_0013 – MOD 1 – Russell Vale Colliery coal transport

Illawarra Residents for Responsible Mining Inc (IRRM) is an independent non-profit community group based in the Illawarra, who is concerned about the Russell Vale Colliery and Underground Expansion Project (Russell Vale Coal Mine) which is operated by Wollongong Resources Ltd (WRL)(formerly Wollongong Coal Ltd).

This submission provides comment on the MP09_0013 – MOD 1 – Russell Vale Colliery coal transport Modification proposal.

An approval of this Modification should include a withdrawal of consent for a Coal Processing Plant (CPP) at Russell Vale Colliery

The Russell Vale colliery site is located closer to densely populated residential areas than any other mine that we have identified in Australia (and we have trawled google earth to verify this claim). Homes border the colliery site on 3 sides, just 225 m from coal stockpiles and schools located just several hundred metres away.



Aerial view of Russell Vale Colliery. Image source: Google Earth, 11.12.23

Over the years, our local community has been adversely affected by the mine, experiencing issues such as noise and particulate pollution. It is well documented that coal particulate pollution increases human morbidity and mortality from respiratory and cardiovascular disease. Given the current times, Russell Vale is not an appropriate location for a colliery, and it is certainly not an appropriate location for a coal processing plant.

Furthermore, the proponent has demonstrated a lack of compliance with numerous conditions from previous approvals, and the NSW government has been ineffective in enforcing compliance. Please see a list of *just some of these* non-compliances and violations at <https://irrm.org.au/home/about-wollongong-coal-ltd/#EPBCAppendices> in a document that formed part of our submission to the Federal government related to the Russell Vale's seeking EPBC approval (<https://irrm.org.au/home/about-wollongong-coal-ltd/>). As a consequence of this serial non-compliance, residents lack confidence in the ability of the proponent to operate the processing plant safely and in accordance with appropriate standards.

The operation of Russell Vale Colliery has been plagued with financial losses, safety issues, and pollution incidents. The company has never demonstrated financial viability, has a liability of over one billion dollars on its balance sheet and its auditors have raised concerns about its viability as a going concern. The company has also had difficulty attracting workers and is currently under investigation by the Resources Regulator for a serious safety incident.

Given these issues which are unique to this colliery, the processing of coal at the Dendrobium Coal Processing Plant (CPP) as proposed by this Modification is preferable to the construction of a CPP at the Russell Vale Colliery site.

The MP09_0013 Major Project approval expires on 31 December 2025. The final two years of this project should be spent winding down operations and preparing for remediation of the Russell Vale Colliery site. The Illawarra region is currently undergoing a transition towards renewable energy and manufacturing, which has led to a shifting of investment away from legacy industries, such as coal mining. This shift is part of a broader effort to reduce carbon emissions and promote sustainable development in the region. It is no surprise that Wollongong Resources Ltd does not want to invest in a CPP at Russell Vale. Fortunately, record low unemployment and new jobs in renewable industries will provide employment opportunities for the small labour force currently employed at Russell Vale Colliery.

We urge the Department and Independent Planning Commission to ensure that an approval of this Modification:

- includes a **withdrawal of consent for a CPP at the Russell Vale Colliery.**
- incorporates into the conditions of consent **a winding down of operations and preparation for post mining remediation of the Russell Vale Colliery site.**

Kaye Osborn
Secretary
Illawarra Residents for Responsible Mining Inc

www.irrm.org.au

11 December 2023