

To the Minister for Planning

I am writing to Object to the State Significant Development regarding the Modification to the Metropolitan Mine, which is currently on Exhibition.

I recently retired from the Community Consultative Committee (CCC) for the Wongawilli Colliery, having served in that capacity for about ten years and attending all meetings. During that time period I gained a great deal of knowledge about the complex nature of coal mining, and of the risks being taken with the Sydney Water Catchment by allowing underground mining in the “protected” Special Areas of the catchment.

I have detailed knowledge of the problems associated with the Dendrobium underground longwall coal mine, having studied the documents pertaining to their recent development proposal. The Metropolitan mine uses mining methods which are less destructive than Dendrobium, but are nonetheless considerable, and severe and irreversible damage has already been caused by undermining the watercourses and upland swamps in the Woronora Plateau. Evidence can be seen in the Waratah Rivulet and now the Eastern Tributary.

This damage has affected the quality and quantity of water flowing to the Woronora Reservoir.

There are also issues with horizontal stresses in the rock strata which cause valleys to infill and cliffs to collapse. According to the Extraction plan, the predicted subsidence for longwall 316 is 1500mm. (Currently Longwall 311 is being mined). The company is not required to produce End of Panel reports, so the public availability of the impacts of previous mining are not easily understood by the community. Vertical subsidence of 1.5 metres is unacceptable in a Special Area of the Sydney Water Catchment.

In their Executive Summary the company argues that they are “relinquishing” areas. Its only in the detail of the report that we see that these areas were found to be too difficult to mine, due to “adverse gas and geological issues”. Over all the years the mine has operated there have been many gas outbursts, some with fatalities. Most recently reported was the evacuation of 70 miners due to gas, in 2019.

So Metropolitan now want to move their operations to the West, over new land, outside of their current lease. I suggest that decisions need to be made slowly in this case, the company is pushing for haste when we do not know the impacts of current mining, mining which will be happening to at least 2029.

I believe Metropolitan mine lacks social licence to operate, after their recent **and repeated** shocking pollution of the waters of Camp Gully Creek and hence into the Hacking River and the Royal National Park.

The company did not report this pollution, despite being required to do so: it required photos from a bushwalker which documented the pollution for the damage to be discovered.

The latest report from the NSW **Independent Expert Advisory Panel for Mining** recognises that knowledge has changed and in their latest advice, March 2025, they say they are in a quandary as to how to best proceed, because the Conditions of Consent were set in 2009. Data and knowledge have changed since that time.

There is concern from WaterNSW regarding our future water supply: to quote the Sydney drinking water catchment audit, 2019:

Water availability - Surface and groundwater resources are not being sustainably managed, particularly in the context of climate change. Just over half (52%) of the surface water monitoring stations had substantially reduced streamflow levels compared to the long term. Insufficient groundwater monitoring is contributing to the uncertainty about sustainable use of groundwater resources.

And more recently from the Sydney Drinking Water Catchment Audit 2022 I Main Report...

In 2021, WaterNSW updated the principles to guide the environmental planning and approval process for all mining activities in the Catchment, including exploration, extraction, production, rehabilitation and closure, as follows:

- *'The integrity of water supply infrastructure must not be compromised.*
- *Leakage from reservoirs as a result of mining activities must be avoided.*
- *Regional depressurisation and diversion of surface water flows must be avoided and minimised by adopting a precautionary approach to mine design.*
- *All mining activities must have a neutral or beneficial effect on water quality.*
- *The ecological integrity of the Special Areas must be maintained and protected'.*

In general the catchment Audit report states that climate change is expected to increase the frequency and intensity of natural disasters, and that these extreme events will threaten the capacity of the Sydney Drinking Water Catchment to provide good quality source water.

They also note the need for Emissions Reduction: suggesting that existing land management practices and pollution regulations will be insufficient on their own to maintain catchment health in the future: substantial efforts to reduce greenhouse gas emissions are also required.

WaterNSW remains opposed to this original project in its current form, as none of its key concerns have been adequately addressed. These concerns are expressed in the **Response to Submissions Report to the Extraction Plan for Longwalls 311-316** (July 2024) and I note...

WaterNSW finds the risk assessment of the impacts of geological structures on the quantity of water in Woronora Reservoir to be inadequate, as it does not encompass all faults near the reservoir. WaterNSW also notes that subsidence predictions have not considered the impacts of these geological structures.

And on page 73...

Fracturing of rock at the base of the reservoir is still considered highly likely...

We are dealing with issues of risk here, and what is acceptable for our future water requirements, not immediately but in perhaps 50 years. Professor Galvin himself has expressed doubts about our knowledge of the future risks of the cumulative damage due to subsidence and fracturing.

The same Report has comments and questions from BCS group of the DPHI, and the responses from the company are, in my opinion, inadequate.

I note that the basemap imagery for the map which the company provides for the Modification proposal for the new LW 317 and 318 is dated 1998! A quick look at the same area on Google Earth shows a lovely green area of pristine bushland. This PCT is reported in the BDAR, only provided publicly in July 2025. to be in “high condition”. I question if the imagery supplied is intentionally misleading, with swamp 106 shown as a brown patch, or is it just lack of attention to important detail?

The proposal suggests that this is a ‘low risk’ activity and is therefore not subject to the Water NSW principles noted above. However, the BDAR repeatedly states that Swamps 74, 75, 106, 117, 119 and 130 have greater than negligible environmental consequence.

The word “Negligible” is used in many Conditions set in mining consents in NSW. We need measurable limits, not the TARP and “adaptive Management” approach now used.

I am concerned that this Modification will not meet the **‘Neutral or Beneficial Effect’ (NorBE) test** in respect of loads or concentration of metals in streams or reservoirs, as required under the *SEPP (Sydney Drinking Water Catchment) 2011*.

Underground coal mining releases iron which has now presumably deposited on the Woronora Reservoir bed. There is an estimate in one of the documents available that as much as 4 tonnes of iron may have been deposited already.

The **Coastal upland swamps** were listed as Endangered Ecological Communities (EEC’s) by NSW in 2012 and the Commonwealth in 2014 and are very significant in terms of their biodiversity value. Nonetheless, Metropolitan is proposing to undermine and permanently damage the large swamp 106.

The significance, value and fragility of the swamps is well documented in the 2017 book by Dr Ann Young “Upland swamps in the Sydney region”. The upland swamps of the Woronora Plateau play an important role in the water catchment by capturing and holding water, filtering it and in times of drought releasing it slowly into the creeks and rivers that feed into the reservoirs.

Each swamp is a unique community containing rare plants and animals. This unique quality means that offsetting of like for like is not possible. Although now permitted by the NSW government, offsetting is widely criticised for not being an adequate alternative to saving something irreplaceable. Each of the swamps contains a unique assemblage of species which contribute to biodiversity. How can offsets be a plausible possibility? These assemblages of fungi, insects, plants, have taken hundreds of years to evolve together and rehabilitation can only provide a pale imitation of this process. The threatened larger fauna are not the only life at risk, ecologists who have been able to enter the Sydney Catchment special areas have told us they estimate that the areas are so diverse that less than half of the insect population has been identified.

When mining commences water drains away from upland swamps into the mining void, the swamps desiccate, the flora and fauna die off, and dry land species take over. The swamps lose their capacity to retain water, as rainfall drains rapidly through the cracks and fractures caused by mining.

These details illustrate the lack of wisdom shown by DPHI in continuing to permit longwall mining in the special areas of the water catchment.

The primary purpose of the Sydney Water Catchment is to store water.

This principle was set forth when the Catchment was legally declared in 1923. The Bulli Seam operation report of 2008 strongly emphasised this principle. Why is it now ignored?

The Metropolitan Special Area was the very first to be declared “Special”

Surely the DPHI should take note of these actual and potential impacts detailed by various agencies and not permit aggressive mining under the upland swamps and streams. The damage will be permanent and the negative impacts on water quantity and quality will continue for many years, maybe in perpetuity.

DPHI recommend increased monitoring of upland swamps, but monitoring does not stop the damage or the mining. TARPs lead to increased monitoring and notifications but the mining operation does not cease.

Among other matters, BCS considers that the Modification did not adequately demonstrate that a key biodiversity assessment principle has been met, that of first seeking to ‘**avoid**’ **the potential impact**.

Climate change is predicted to drive more frequent and extreme natural disasters in coming years. This will threaten the resilience or capacity of the Catchment to maintain essential ecosystem services such as the provision of adequate, good quality source water. The evidence from the 2022 audit underscores the important role of climate in Catchment health and suggests that it is unlikely that good land management practices and pollution regulation will maintain Catchment health in future, unless substantial effort is also made to reduce greenhouse gas emissions and limit climate change impacts.

All modelling is based on hypotheses which may in the future proved to be false. Global warming is now contributing to intense rain fall periods and drought and it is very uncertain how this will affect the fragile ecosystems found in the Special Areas of the catchment.

Aboriginal Heritage sites

The plateau areas of the Illawarra have been used by Aboriginal people for many thousands of years and were no doubt very important. There are many streams, caves, overhangs, providing shelter which will have been used in the past. The artwork, rock grooves and other evidence would be valued in other countries, but in Australia the extractive industries seem to take precedence.

The finding of a conglomerate of 15 Aboriginal Art sites (14 in shelters and one engraving), combined with numerous grinding grooves and unexplored artefact sites, all located within such close proximity of each other suggests a highly significant cultural landscape.

The ILALC have noted concerns about the lack of rigour provided by the company in relation to the conclusions that the impacts of mining are expected to be of minor impact on the significance of the identified sites. There are no doubt other sites.

The mitigation measures proposed within the ACHAR also appear to essentially involve monitoring of impacts over the life of the mining operation. As indicated by ILALC, this is not a mitigation response, rather, it is management of destruction only. Such a sad situation.

My time does not permit me to address all the issues which should be considered, such as, but not limited to...

The probable impact on Koalas, which despite the BDAR comments, are very probably travelling through the area. Koalas are notoriously difficult to spot and very little time was devoted to them in the report.

The impacts from the construction of the proposed **Ventilation shaft** in this fragile environment. From memory it involves 32 hectares of disturbance to vegetation, as well as vehicular traffic, diesel fumes, importation of weeds etc.

The proposed **new first working and roadways**, in preparation for new expansion. This should certainly not be allowed!

All these reports and documents take a great deal of time to read and analyse and are literally thousands of pages. All the reports and Monitoring are done by Consultants, who are paid by the company. We need to change the system. Documents were much shorter when written by hand!

After my ten years on a community consultative committee I believe that its very important to have **independent** input for these planning decisions vital to our future.

This proposal should go to an Independent Planning Commission.

I object to this Modification.

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Sincerely,

Mrs Ann B. Brown BSc (Hons)