



Submission: Project SSD-8194 Illawarra Coal's Proposed Mine Extension for Dendrobium

From: Lane Cove Coal and Gas Watch

To: NSW Department of Planning and Environment

Date: 18 September 2019

Thank you for the opportunity to make a submission.

Lane Cove Coal and Gas Watch (LCCGW), a sub-committee of the Lane Cove Bushland and Conservation Society, is a community group formed in 2014 to campaign for no-go zones for coal and coal seam gas activity in:

Drinking water catchment,
Prime agricultural land, and
Special wild places of New South Wales

LCCGW object to the Illawarra Coal's Proposed Mine Extension for Dendrobium. LCCGW has conducted community door-knock surveys in the Lane Cove electorate multiple times in the past 5 years. Community survey showed that 93% of Northwood and 91% of Linley Point residents surveyed support the banning of coal and coal seam gas in Sydney's drinking water catchment, 97% of Lane Cove Central and 97% of Lane Cove West residents surveyed support a more balanced approach towards coal mining, which included putting a stop to Sydney's drinking water catchment area being undermined by longwall coal mining.

LCCGW notes that the proposed mining is just 300m from Avon Reservoir and 630m from Cordeaux Reservoir. The mining will cause loss of water from water courses and swamps that feed the reservoirs. If the proposed mining goes ahead, water loss from the catchment due to Dendrobium's mining will increase over the coming years, with surface water loss expected to peak at 27.6 ML per day in the year 2035. Consultants estimate that up to 9,500 ML of surface and ground water will flow into the mines each year, which is the equivalent to the annual water usage of 123,940 residents of Greater Sydney. This is an unacceptable permanent loss of drinking water for short term gain. LCCGW does not believe that there should be mining at all within the water catchment area of a metropolitan city, at a time where climate patterns are becoming more erratic, and where water security concerns may result in the costly operation of the Kurnell Desalination Plant.

LCCGW also notes the current and historical inadequacy of the government in assessing proposals for new mines and expansions in water catchment areas. The current assessment metric for coal mining projects, both new and expansions, have and would continue to result in disastrous environmental outcomes in other ways. Some additional concerns LCCGW have regarding the Department of Planning's approach include:

- Short term economic merit prioritised over social and environmental merits. If relevant environmental outcomes of projects, such as filling in mine voids, avoiding undermining swamps, filtering discharge water prior to releasing into streams, make a project uneconomic, then mines should not be able to get approval based on economic merit. Precedence of proposals being approved without adequate environmental outcomes being met due to companies claiming these actions are cost prohibitive. Also, note that South 32 predicts that its 305-meter-wide long wall panels may result in subsidence of 2m to 2.45m. Previous mines of similar width have caused 2.5m to 3 m of subsidence, so not only are permanent damage predicted, South 32's prediction may be conservative.
- Mine merits evaluated on short-term merits only, as opposed to long term impact. South 32 is seeking approval for 30 years of mining at Dendrobium. Increasing population pressure on water resources and impacts of climate change mean that it would be irresponsible for the New South Wales Department of Planning to support a 30-year approval.
- Erosion of environmental offsets that should have been left in perpetuity. The Warkworth sands woodlands were to be held in perpetuity by Rio Tinto for the 2003 approval of the Warkworth mines, and yet the mine later gained approval to demolish this area for the Warkworth Extension Project. LCCGW notes South 32's proposal to offset catchment land and ecological communities that have been irreparably damaged by mining. However, truly like-for-like offsets are rare. Furthermore, there is no "equivalent" land that could compensate for damaged and compromised water catchment. The catchment area's significance is tied to the geology and geographic location, offsets do not exist.

LCCGW notes that in the IPC's rejection of the Bylong Coal Project, the following was listed as a reason: "The Commission is of the view that the distribution of costs and benefits over and beyond the life of the mine is temporally inequitable in that the economic benefits accrue to the current generation and the environmental, agricultural and heritage costs are borne by future generations." Similarly, the Dendrobium expansion will leave legacy issues with drinking water loss and damage to ecological areas.

LCCGW is of the opinion that any amount of mining in the water catchment area is inappropriate regardless of the requirements put in place for risk mitigation. LCCGW believes that, especially with higher population density, mining practices in water catchment areas should not be considered as the long-term hazard of damage to water supply and quality outweighs short term economic gains.

The current Liberal government promised before the 2015 election that no mining would occur in water catchment areas in response to community-wide concerns of water loss and degradation as effects of mining. Community concerns proceeds to this day, and so too, does coal mining in water catchment areas.

Coal mining is a high-risk activity. The destruction of upland swamps, the tailing spills into catchment area, and the draining of Thirlmere lakes, all shows that the long-term cost is not worth the gain. No amount of monitoring is going to repair cracked swamp bedrocks, fill dried lakes, or remove all traces of a spill.

LCCGW queries whether an invaluable resource, a water catchment and system which provides for a city of over 5 million people, is allowed to be irreversibly damaged for short term gain. We question whether any coal mining activity is appropriate at all in the whole of the water catchment area.

We are sure the Planning and Environment Department appreciates the responsibility placed upon them. We would like the panel to reconsider the adequacy of the terms of reference and the risks to the water security of the people of New South Wales. We would like the panel to consider recommending the effective banning of mining in water catchment areas, for the sake of the people of New South Wales, and the people of Australia.

Sincerely,

Lane Cove Coal and Gas Watch.