

## Submission on Dendrobium Mine Extension Project, SSD - 8194

Illawarra Residents for Responsible Mining Incorporated (IRR M) is a community group that was formed in 2010 in response to the proposed expansion of Russell Vale mine. We advocate for responsible mining, mining that puts the health and wellbeing of ordinary people, and of the environment, ahead of corporate mining interests.

Given the location of Dendrobium Areas 5 and 6 in the Special Areas of Greater Sydney Water Catchment, we object to the proposal. The NSW Chief Scientist noted in 2014 that **Sydney is the only known example in the world of longwall mining being permitted in a publicly owned water catchment.** We maintain that the water catchment of the largest city in the driest inhabited continent on earth is no place for mining. This area should be set aside - to the centre of the earth - to protect the catchment, reservoirs and dams. We call for a permanent ban on mining in the Special Areas. We also call for a moratorium on mining in the broader catchment while detailed, transparent, government-directed and purely independent scientific studies are carried out, assessment is undertaken and an adequate regulatory and management framework is put in place for the long term security of Greater Sydney's drinking water.

- We refer to WaterNSW's submission to the Independent Expert Panel for Mining in the Catchment (IEPMC) *"From WaterNSW's viewpoint, the single most important consequence which has been highlighted by the HoCR is that **subsidence induced by the Dendrobium Mine longwalls is likely to be resulting in significant diversion of surface water which would otherwise contribute to Greater Sydney's water supply.** The associated degradation of water quality and ecological integrity of Special Area catchments are also of concern."* (WaterNSW submission to the IEP – 1. Initial Task D2018/12692, Pp 11-12)
- Impacts of mining in the water catchment, including cracking and subsidence of land, swamp and water courses, and subsequent dessication and/or diversion and or/loss of ground and surface water are unacceptable. South 32's estimate of 2m to 2.45m of subsidence may be conservative as previous longwalls of similar width have caused 2.5m to 3 m of subsidence.
- The proposal to offset catchment land and ecological communities that have been irreparably damaged by mining is ludicrous. **There is no "equivalent" catchment Special Areas land that could "offset" damaged and compromised water catchment.**
- A number of Threatened Ecological Communities in the Special Areas have been irrevocably damaged by Dendrobium's mining and the proposed expansion will exacerbate this damage.
- **We are facing a global climate emergency** and yet this proposal would emit 260 million tonnes of CO<sub>2</sub>e (in production, transport and consumption) for the life of the project, impacting the capacity of the NSW government to meet GHG emission targets. SEPP Clause 14 (2), as cited in the Rocky Hill case states: "... the consent authority must consider an assessment of the greenhouse gas emissions (including downstream emissions) of the development." The approval of the project would lock in the equivalent of 6 months of admissions for all of Australia at a time when we should be dramatically reducing emissions (*The Federal government estimates Australia's greenhouse gas emissions for the year to December 2018 as 538.2 million tonnes* (<http://www.environment.gov.au/climate-change/climate-science-data/greenhouse-gas-measurement/publications/quarterly-update-australias-nqqi-dec-2018>) Bluescope and other Australian steelmakers need to transition to

fossil free steel production, as steel manufacturers in other countries are doing, such as SSAB, which plans to eliminate all CO2 emissions by 2045

(<https://www.ssab.com/company/newsroom/media-archive/2019/09/13/10/21/ssab-lkab-and-vattenfall> ).

- South 32 has said that if this proposal is not approved, it will spell the end for the Port Kembla Steelworks and the Port Kembla Coal Terminal. This is misleading and, when questioned by the Illawarra Mercury, Bluescope's Port Kembla steelworks declined to confirm that the steelworks would collapse if the proposed Dendrobium expansion does not go ahead. **There are still 11 years of mining at Dendrobium under current approvals (for area 3A and 3B) and South 32 holds other metallurgical coal leases that are *not in the water catchment of Australia's largest city*.** Furthermore, South 32 is only selling one third of Dendrobium's coal to Bluescope for use in Port Kembla Steelworks. It is exporting the other two thirds of its product. Bluescope is also exporting coke that is excess to its own needs. It is simply untrue to claim that the production of steel at Port Kembla is dependent on this mining expansion and the economic case is flawed. If South 32 and Bluescope were serious about the ongoing viability of PK Steelworks, they would reserve coal for steelmaking, rather than exhaust supply through export.
- Increasing population pressure on water resources and impacts of climate change mean that **it would be reckless and irresponsible for the New South Wales Department of Planning to support a 30-year proposal** which has long-term or permanent negative impacts on Greater Sydney's drinking water supply. South 32 has provided no alternatives to this aggressive and damaging longwall mining expansion.
- The Surface Water Assessment (HEC, 2019) estimates that **up to 9,500 Megalitres (ML – million litres) 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.
- The commitment to *not undermine named watercourses* is of concern. A river is only as good as its tributaries. The named watercourses will dry if not fed by their (unnamed) tributaries. Longwalls 10 to 14 in Area 3b have damaged WC21, a tributary of Wongawilli Creek, and it no longer holds water. The cumulative impacts on the catchment of the kind of damage caused at WC21 are not understood.
- **It is not in the public interest to allow a mining expansion that will have such significant and lasting impacts on water quantity and quality.** We are currently in a severe drought and the Greater Sydney water storage levels are below 50%. The NSW State Minister for Water has said that "Sydney was experiencing some of the lowest inflows into its dams since the 1940s", (Guardian, 28:5:2019). The proposed mining, just 300m from Avon Reservoir and 630m from Cordeaux Reservoir, will cause loss of water from water courses and swamps that feed the reservoirs. All reservoirs are of vital importance but Avon is crucial as the water supply for the Illawarra.

In summary, **the risks of this proposal are too great and the consequences too damaging.** The NSW government should be protecting the Special Areas, not sanctioning accumulating degradation for short-term economic gain.

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on behalf of IRRM  
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