

17 September 2019



NSW Department of Planning, Industry and Environment  
Via on-line submission portal  
<https://www.planningportal.nsw.gov.au/major-projects/project/9696>

**Illawarra Branch**  
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Dear Sir / Madam,

**DENDROBIUM MINE EXTENSION PROJECT SSD-8194  
SUBMISSION RE ENVIRONMENTAL IMPACT STATEMENT**

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The Illawarra Branch of the National Parks Association (NPA) has over 1500 members and supporters in our region. Like other branches of the NPA it is engaged in the conservation and protection of nature as well as conducting outdoor activities. We take a particular interest in mining proposals that threaten the natural and cultural values of the Illawarra Escarpment. In addition we advocate greater recognition of mining's wider climate change impacts.

**We write to object to the proposed extension** of mining in the Sydney Water Catchment by South 32 Illawarra Coal at the Dendrobium coal mine.

The proposed extension described in the Environmental Impact Statement (EIS) is very large: 21 longwall panels 305 metres wide. Approval is sought to mine for 30 years, until 2148. We can understand that the company would seek long-term stability for planning, but we believe the NSW Department of Planning, Industry and Environment would not be acting in the best interests of the population of NSW to approve this extension, despite the economic benefits of jobs in the Illawarra region.

We have many reasons to object, including damage and drying of upland swamps, cracking of creek beds, valley closures, greenhouse gas emissions, and health impacts due to coal dust.

It is argued by BlueScope Steel Ltd that the coal from the Dendrobium mine is essential for their steelmaking production, together with that from other sources, particularly the Peabody Metropolitan mine at Helensburgh. We understand that coal varies and that blending is necessary to provide the appropriate characteristics for the reduction of the iron ore in the steelmaking process. However, there is a great deal of research going on internationally to find methods of making steel which are less carbon intensive, and do not produce such large quantities of greenhouse gases. BlueScope acknowledges this in their submission to the NSW Independent Panel on the Impacts of Mining in the Catchment (IEPMC), but do not acknowledge the large investments and progress currently being made internationally by companies such as ArcelorMittal.

Illawarra Coal currently already has approval to extract coking coal from its Appin mine, and the 3 longwalls already approved there could presumably be mined to supply BlueScope Steel.

We believe that approval for 30 years of mining is far too long. The world and our nation need to be reducing carbon emissions to zero by 2050 and importantly, starting to make a transition to less emissions immediately.



## **Greenhouse gas emissions and climate change**

The NSW Land and Environment Court has recently refused development consent for the Rocky Hill Coal Project in the Gloucester Valley, citing the mine's likely contribution to climate change as a key reason. The decision will have wide-reaching consequences and will likely affect the viability of coal and other fossil fuel-dependent industries in Australia.

The growth in international jurisprudence directly linking fossil fuel developments with climate change may also lead banks and others who would traditionally invest in these industries to consider alternatives. Chief Justice Preston said that the Rocky Hill mine would be in the wrong place at the wrong time. The mine was open cut, not underground, but like Dendrobium, was for coking coal.

BHP recently (July 2019) announced that it will set public goals to address Scope 3 greenhouse gas emissions. Their CEO stated that "It is clear from the IPCC's 1.5 degree report that we all must work to prevent more greenhouse gases from entering the atmosphere." We don't live in isolation as far as climate change is concerned. Recent research by Climate Analytics estimates that if all current coal and gas projects are completed, Australia could be responsible for between 12 and 17 per cent of global emissions by 2030. Do we want to shoulder this kind of responsibility?

## **Mining in the Sydney water catchment, water supply and groundwater**

In the Executive Summary of the EIS the company states;

- Underground mining has been ongoing in the Metropolitan Special Area where the mine is located for more than 100 years.

This is no reason at all why it should continue, in fact it is most likely a reason why any longwall mining in the water catchment should not continue, due to the damage created by goaf voids, by valley closures, by stream drying and the other cumulative impacts of these one hundred years of mining.

The longwall mining which is proposed continues the most aggressive ever carried out in the catchment area. Previous mining in Area 3B means 600m of a watercourse (WC21) has no water in it in wet periods and an even longer dry length when there is little rain, due to cracking of the creek bed. Yet the 2015 End of Panel Report claims this is within the predicted impacts. Similarly with the impacted swamps, use of terms like "minor" and "negligible" minimise the real impacts. How can this obfuscation be reconciled with Neutral or Beneficial effects?

We note that the Independent Expert Panel for Mining in the Catchment (IEPMC) states in its Initial report Executive summary (2018);

Knowledge of the consequences of mining on surface water quantity in the Catchment Special Areas has progressed substantially over the last 10 or so years but limitations in monitoring and modelling mean that it is still difficult to verify conclusions by some stakeholders that mining has had negligible consequences on surface water supplies...

The insufficiency, variability and limitations of information restrict the scope and accuracy of calculations of groundwater and surface water diversion from the catchment into mine workings and other storages. The water balance data for the Dendrobium and Metropolitan mines currently rely on rainfall-runoff models (catchment water balance) and groundwater models (groundwater balance), with a minimal amount of work undertaken to date on reservoir water balances. A limitation of these models is that they do not necessarily correspond to the space or time scales relevant for quantifying water losses to the Sydney water supply.

Knowledge of the contribution of swamps to water supplies is also particularly undeveloped due to lack of integrated monitoring targeting swamp water balances.

The release of the final report by the IEPMC has been delayed. We would like to see the final report before making further comments on the mine's impact on water quantity and quality.

We do note the quite unbelievable statement from the company (Table Es-2), that due to improved sedimentation controls:

It is considered that the Project would, therefore, have a net beneficial effect on water quality in the Special Catchment Areas.

According to a 2012 report from the National Water Commission, climate change will lead to decreased inflows to reservoirs due to longer and more severe droughts and reservoir levels will drop due to increased evaporation on the more frequent extremely hot days. We are already experiencing these hotter days, and the water storage in the Sydney water catchment is now less than 50%. Evaporation due to wind has been extreme recently. Cataract Reservoir is less than 30% full.

### **Coal and steel**

In addition to changes in climate there have also been changes in the economics of coal mining and steelmaking leading globally to bankruptcy of coalmining companies and the closing of steel mills. It is our view that the amount of coal extracted in the catchment should be minimised in the future, and that South32 Illawarra Coal could provide coking coal for Port Kembla from its mines at Appin and Westcliff, which already have permissions. Coking coal should not be exported. In the longer term, electric arc furnaces driven by renewable energy may be a way to produce steel but lessen the greenhouse impacts of fossil fuel mining and use. We need to start the transition to a lower carbon economy.

### **Conclusion**

Government planning needs to provide for a fast-growing population in a changing climate. It is time for the government to prioritise water supply for future generations. We need to have clean, reliable water in the future. For this reason NPA Illawarra branch members strongly believe that further expansion of mining in the water catchment should not be approved.

Community groups and volunteers should not constantly have to campaign against the ongoing degradation of an essential public asset. The protection of the Special Areas and our water supply is the responsibility of the relevant agencies and the elected representatives of the people of NSW.

NPA Illawarra Branch members strongly believe that the proposed extension of longwall mining in Dendrobium Areas 5 and 6 should not be approved.

Thank you for the opportunity to comment.

Yours sincerely,

*Mrs Ann B Brown, BSC (Hons)*

**Science researcher, Illawarra Branch  
National Parks Association of NSW**

Endorsed by:

*Mr Graham Burgess*

**President, Illawarra Branch  
National Parks Association of NSW**

*Ms Helen Wilson*

**Secretary, Illawarra Branch  
National Parks Association of NSW**