

Attention: Director, Mining and Industry Projects
Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

To Whom It May Concern,

Objections to Proposal MP 10_0046 MOD 2

I write to object to the proposal of Wollongong Coal (WC) (formerly Gujarat NRE (GNRE)) for Modification to the Preliminary Works Project MP 10_0046. Some of the reasons for my objection are as follows:

Damage to Sydney Water Catchment Special Area and loss of surface and groundwater

- The proposed longwall is in the Sydney Water Catchment Special Area. Falling within the expected subsidence area are two Upland Swamps of Special Significance listed under the Threatened Species Conservation Act 1995. The first of these (CRUS 1) flows directly into Cataract Reservoir. The second (CCUS4) drains into Cataract Creek and then on into Cataract Reservoir. Cataract Creek also falls within the subsidence area. The watercourses and swamps to be undermined are an integral part of the Sydney Water Catchment system that supplies Cataract Reservoir. Longwall coal mining is a listed Key Threatening Process; it is known to damage the surface and crack water courses and swamps, causing water contamination and loss.
- The development is expected to increase groundwater inflows to the mine from an average of 1.1 million litres a day to around 1.6 million litres a day (Ref: EA, p.ii). The four coal mines operating in the Sydney Water Catchment Special Area currently drain 3 billion litres (or 1,200 Olympic sized swimming pools) from the Special Areas. The Sydney Water Catchment Area supplies drinking water for 4.6 million residents of Greater Sydney area.
- The proposal involves longwall mining a *third* seam of coal beneath two previously mined seams. *Single* seam subsidence impacts are difficult to predict; the uncertainty is compounded by triple seam mining and this poses unacceptable risks to the water catchment area. Application of the precautionary principle should be the basis of assessment - *and rejection* - of this proposal.

Piecemeal Planning process

- Although WC claims the incremental environmental impacts of Mod 2 over and above impacts from existing operations are likely to be minimal, the cumulative impacts to the Special Areas of this mining along with past and proposed future workings in the Wonga East area must be considered. A piecemeal approach driven by the financial imperative of one under-resourced foreign-owned mining company, is not only bad planning, it is negligent.
- An application for mining longwall 6 is already under consideration by DoPI as part of the Underground Expansion Project (MP 09_0013). It is clear that this proposal cannot sensibly be regarded as simply a modification to the Preliminary Works project. WC/GNRE is again attempting to incrementally establish its expansion project. Moreover, recent ICAC findings have exposed extensive corruption in the planning process, in particular in regard to water and coal mining. To stem further erosion of public confidence in the Major Project planning process, DoPI should refuse this application and complete assessment of the Underground Expansion Project in a systematic and transparent manner.

- The application makes the misleading claim that this development is necessary so that WC can continue to mine. In fact, WC has an existing approval to mine the V panel. It is both inappropriate and irresponsible to take up the valuable time of government agencies and community members once again to consider a half-baked application aimed at solving the immediate cash flow problems of this company.

Particulate pollution will increase morbidity and mortality

- Russell Vale Colliery is located in what is perhaps the most densely populated area of any colliery in Australia, with houses and schools bordering the site and just 250m from the huge coal stockpiles. Moreover, the only exhaust fan from the Wongawilli seam – not even mentioned in this EA – blows pollutants over West Corrimal. This development will increase human morbidity and mortality from respiratory and cardiovascular disease caused by coal particulate pollution in the area of Russell Vale, Corrimal, Bellambi and surrounding suburbs. Coal dust will also impact the health of residents along the trucking route to Port Kembla Coal Terminal.

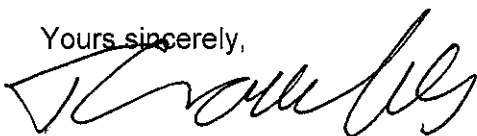
Unsuitability of the proponent

- WC has been responsible for multiple compliance failures and has demonstrated that it is unable to self-regulate. The Russell Vale Colliery contains antiquated infrastructure and WC has failed to fulfil requirements of previous development approvals to upgrade the facilities on the site to modern standards. These failures include: construction of a sound wall and coal loading facility and the realignment of Bellambi Creek to prevent flooding of residents downstream in the event of a major flood event. The company has also failed to pay carbon tax and mining royalties. It even failed to pay its own workers for several months in 2013.
- Although WC has a different name and a different major shareholder and director, the corporation is in essence the same as GNRE, with the same staff, the same financial problems and, as is apparent from this application, the same style of using brinkmanship to incrementally establish its unapproved expansion. WC should receive no special treatment for its financial woes as the new investors' due diligence would have informed them of the company's financial and planning situation.

Jobs and royalty revenues may be lost with the rejection of this entirely unacceptable proposal. However, the broader community interest and inter-generational considerations are of greater significance. The number of jobs at stake is small relative to the regional work force and likewise the royalty revenues, if they are ever collected, are very small relative to annual State and Federal incomes. The value of the natural assets that would be put in harm's way by this proposal cannot be sensibly quantified; they are priceless.

I have not made a reportable political donation.

Yours sincerely,



Tim Nicholls

40 Organs Rd, Bulli, NSW 2516

12th May 2014