

Attention: Director, Mining and Industry Projects  
Major Projects Assessment  
Department of Planning  
GPO Box 39  
Sydney NSW 2001  
13.05.2014

To Whom It May Concern,  
Objections to Proposal MP 10\_0046 - MOD 2

I write to object to this second modification to the Preliminary Works Project MP 10\_0046.

I believe it is important to consider the items that Wollongong Coal has not included in this application and why WC has decided not to address or include these far reaching issues? Is it because they have been negligent and do not want to draw attention to them?

Bellambi Creek Realignment:

This is a major concern to the local community. This is a condition imposed on WC by the Preliminary Works approval (postponed in Mod 1). WC is operating non-compliantly at this very moment. The only reason WC/GNRE can offer for this work not being carried out is financial. This Mod 2 application should be refused by the PAC until this work is carried out or the situation fully resolved.

Community Consultation:

The community was informed that there would be no further fractionating of the planning process and that the proponent was prepared to wait until there was a decision on the Major Expansion project (PPR). This statement was deceptive.

This was the first Planning Development application to be made by WC and it is regrettable that they have started by neglecting to hold an information session to present the proposal and answer questions from the community.

Three simple questions were asked of WC during the Mod 2 exhibition period, firstly as a resident of the area and secondly as a member of the CCC. WC has refused to answer them. They were,

1. Have the V Panels in the Bulli seam been mined yet and if so when?
2. What is the current work force at Russell Vale today?
3. A list of all the community and sports groups that WC donate to as from today (this information has previously been requested)?

I as a resident take this refusal to answer simple questions as obstructive. Regrettably, WC is continuing the abysmal consultation record of GNRE.

Exhaust Fan:

The huge exhaust fan exists on the colliery site just above the residential area, it can clearly been seen on several aerial website. This fan has never been part of any GNRE or WC planning applications. In this application it is referred to as a rubber tyre vehicle portal. Requests have been made via the CCC about monitoring information from this fan but WC has cited 'commercial in confidence'. This fan should be relocated away from the residential area or heavily monitored with the data freely available to the community. This Mod 2 application should be refused by the PAC until this work is carried out or the situation fully resolved.

Staff Numbers:

Employment figures have been inflated by the proponent for brinkmanship purposes. WC has cited a figure in February 2013? The last notification to the CCC was 293 and this is prior to the 20% staff cuts. We therefore must assume that the workforce of Russell Vale Colliery is 234 staff and WC has stated that further staff cuts are immanent.

This company uses staff losses on one hand to justify their application whilst dismissing staff on the other because of financial reasons.

WC's Finances:

It should be noted here that WC have numerous outstanding obligations to the community, tax payers, contractors, suppliers, contractors, consultants and previous clients.

These obligations are in the form of unpaid taxes, unpaid royalties, unfulfilled planning obligations, unpaid services and future possible legal actions. The proponent is using these financial management issues as brinkmanship in an attempt to pressure the authorities into approving this

minor application, when in fact all of these outstanding debts should actually be resolved and paid for prior to any approval to this company.

It is of great concern that WC states that this minor application will ensure that the company will be able to continue to meet its "environmental and safety obligations". If the company is that financially fragile, the Govt should insist on a substantial bond to cover any future unpaid costs. This is clear testimony that WC is not an appropriate proponent to extract this coal or operate this colliery.

#### Green House Gas Emissions:

WC has neglected to even include a section addressing GHG emissions. This is typical of a company that does nothing to reduce its carbon footprint. This is in spite of the fact that technology is available now to reduce fugitive methane emissions, and that other mines in the area are using technology to reduce emissions. How many energy saving devices do residents need to make to make up for this blatant release of methane?

We submit that it is wrong for the government to consider allowing CSG wells in the Illawarra on the basis that the methane is a valuable resource, while at the same time allowing large quantities of methane to be wasted only a few kms away by allowing proposals like this WC proposal.

#### Water:

It is shocking to think that this proposal is even being considered without the completion of the Ground Water Modelling report. This report is required for the PPR assessment. Given that this proposal will drain 500,000 litres of water from our catchment area, this application should be postponed until the Ground Water Modelling report is completed.

How many water tanks and water saving devices are required by residents of the area to save 500,000 litres of water?

#### Options:

If WC were committed to lessening the impact on the catchment area and dam to enable them to continue operation they should provide options rather than just resolutely continue with their proposed PPR layout. They could for instance divide the LW6 down the middle with gateroads and mine it in two halves. This would drastically reduce subsidence and risk to our precious water catchment. They could mine the first portion of longwall 6 using bord and pillar to reduce subsidence and damage to the Special Areas. They could also mine the eastern portion of longwall 6 first, thus avoiding the problematic western section.

WC needs to be more active in proposing solutions to their own financial, management and planning difficulties, rather than relying on the Govt agencies and community to take pity on their self-induced woes.

#### Status quo:

WC state that the continuation of mining will not impact on the surrounding residential any more than it currently does. The current mining practice at Russell Vale already impacts on the neighbours and there needs to be upgrades to every application until there is satisfactory practice and infrastructure at this colliery.

GNRE and now WC are continuing to operate this mine with antiquated and outdated infrastructure. They have made application in their Expansion Project, their subsequent PPR and now in this Modification to continue to load coal off the stock pile and on unsealed roads. It is vital that these truck loading facilities are full constructed and operational prior to any further approval at this mine.

The noise and dust generation from this antiquated infrastructure impacts greatly on the local residents. WC has also been refusing to design and plant vegetated windbreaks on site that would drastically reduce the 670 tonnes of coal dust currently being eroded from their small stockpile each year. Fifty tonnes of dangerous 0.25 micron dust is blown over the surrounding residential areas each year and this is from their current 60,000 tonne stock pile. It is vital that these issues are fully resolved and operational prior to any further approval at this mine.

I strongly object to this development.

I have not made a reportable political donation.

Yours sincerely,

