

I strongly object to the Proposed Expansion of this mine.

Destabilising overlying mines

The mining is particularly risky because a third seam of coal is being mined beneath two previously mined seams. Triple seam mining has little precedent and impacts are difficult to predict.

The proponent admits that instability in the overlying old Bulli seam workings may cause pillar collapse and subsequent subsidence of 1 to 2 metres. It is contrary to public interest for the NSW government to allow such risky mining in the water catchment for 5 million people of Greater Sydney in a time of drought.(1)

The land around the proposed mining is unstable. The proposal states, "It is noted that large areas of the surface within the UEP Application Area are currently on the verge of moving as a result of previous mining." [2] It is described as being in "limiting equilibrium" – still moving, having not stabilised since WCL mined longwalls 4, 5 and 6 several years ago. If the Special Areas of Sydney's Water catchment are so special that ordinary people can't even set foot on them without risking a \$44,000 fine, they are special enough that they should be protected from earth moving, destructive mining.

Impact on ground and surface water

The project will further the loss of ground and surface water from Cataract Reservoir and its catchment, adding 131 ML/year of ground water and 10 ML/year of surface water to losses from previous mining damage. This is estimated to bring the total ground and surface water loss from the project to 298 ML/year. [3] This is the equivalent annual water usage of 25,492 people. [4]

An additional 146 ML of "upgradient inflow" from surrounding mines – the now "inactive" Cordeaux mine and Corrimall mine (not mined by Wollongong Coal) – are draining water into WCL workings, bringing the total to 444 ML/year.[5] This is the approximate water usage of 37,981 Greater Sydney residents.[6]

Following mining the void left will fill up with water. The water will keep rising until it reaches the adit (mine portal) in the Illawarra Escarpment in about 2057. The water will overflow through the adit and the outflow will slowly increase, reaching 0.3ML (300,000 litres) per day in 2179. WCL's modelling shows that the volume of water outflow at the adit above Russell Vale will continue to flow, even beyond 2179. [7] In other words, the project will result in escalating water discharge from the adit for at least 160 years and probably longer. The outflow will need to be managed and treated. Wollongong Coal is proposing a commitment to manage and treat the water for 10 years.[8]

Greenhouse Gas Emissions

Although only a small project, the Expansion has a large carbon footprint. WCL's consultants divide emissions into Scope 1, 2 and 3, with 1 and 2 being the emissions produced in the mining and processing of the coal and Scope 3 being emissions are "indirect emissions that are a consequence of the activities of the reporting

entity but occur at sources owned or controlled by another reporting entity”[9]. Scope 3 emissions are the largest volume of emissions, as they involve use of the coal. The total CO₂e emissions for the project, from mining up to and including usage are approx. 11,147,000. [10]

To put this in context, this is the equivalent to the annual emissions of more than half a million Australians.
[11]

Economic case

The mine is currently in Care and Maintenance mode and only about 60 staff are employed. Therefore the impact on the employment outlook for the Illawarra if this approval was not granted would be minimal. Moreover, as neither of Wollongong Coal’s mines are currently operating the flow-on effects to the local economy if this proposal was not approved would be negligible.

A coal processing plant on site at Russell Vale Colliery

Wollongong Coal plans to build a coal processing plant at the Russell Vale Colliery and process coal on site.[12] The Russell Vale mine is the closest mine to any built up residential area in Australia and is not a suitable area for coal processing. Moreover, the proponent has been unable or unwilling to comply with many conditions of past approvals and the NSW government has proven to be unable or unwilling to enforce compliance. Residents have no confidence in “conditions” or “commitments” to operate the processing plant according to suitable standards.

Trucking

The coal is trucked along Bellambi Lane, past people’s homes onto the Northern Distributor to Port Kembla Coal Terminal. WCL’s new expansion proposal means more coal trucks on the busy Memorial Drive. There will be an average of 16 laden trucks per hour, Monday to Saturday, travelling to the port.[13] In other words, counting the return trip, there will be 32 truck movements per hour, or one truck every 112 seconds. In addition to this there will be more coal trucks transporting coal mining waste.[14]

A history of non-compliance with approval conditions

Previous applications and approvals promised numerous items to protect the community and environment that have never been met by the proponent. These include but are not limited to: truck loading facilities, sound walls, covered conveyors, limited stockpiles, sealed roadways and realignment of Bellambi Creek. Now in this new revised project, Wollongong Coal is promising the same or similar things.

In fact right now, Wollongong Coal is operating under three major non-compliances: the realignment of Bellambi Creek to protect it from pollution and flooding (due Oct 2012); the removal of 200,000 tonnes of oversize coal that was illegally stockpiled on the adjoining slag heap (due July 2019); and, the dedication of land to Council in a

1989 approval from Wollongong City Council (due 1990). All of these obligations still have not been met.

It is of real concern that the proponent is proposing to put in place pit top infrastructure after they have started mining. History shows that operators of this mine are unwilling or unable to meet the conditions of mining approval and the Department of Planning is unwilling or unable to enforce compliance. In every case the local community suffers from the failure to implement required pit top infrastructure.

The suitability of the proponent

Wollongong Coal and its parent company Jindal Steel and Power Ltd, are currently the subject of an investigation by the NSW government's Resources Regulator into whether or not they are a 'fit and proper' entity to hold a mining license.

In India, corruption charges are being framed against Naveen Jindal, Chairman of Jindal Steel and Power Ltd (JSPL). JSPL, via a holding company, JSPL Mauritius, is majority shareholder in Wollongong Coal Ltd. [14]

Moreover, here in Australia, the company has a history of failing to comply with conditions of approval. Even its auditors have questioned its capacity to continue as a going concern; its current liabilities exceed its current assets by nearly A\$1 billion. Operating a coal mine in the water catchment of Australia's largest city is risky business. The NSW Resources Regulator started investigating whether Wollongong Coal was a "fit and proper" entity to hold a mining license in 2016..... and it's still investigating..... Isn't it about time the Resources Regulator reached a conclusion? And shouldn't any consideration of an expansion of operations be postponed until after a conclusion has been reached.

This project should be refused.

Sincerely,

Robert McLaughlin

Bulga

0405555901