

## **To whom it may concern**

I object to Wollongong Coal's Revised Preferred Project Report (PPR) to the Russell Vale Underground Expansion Project 09-0013.

I write as a resident living close to the Russell Vale Colliery and as a consumer of Greater Sydney's drinking water.

## **Wollongong Coal Ltd (WCL) is an unsuitable proponent, with a legacy of non-compliance**

- Wollongong Coal has a history of failing to deliver on commitments and failing to comply with conditions of its development approvals. The realignment of Bellambi Creek and associated flood mitigation works are just one example of a condition that WCL failed to meet. The misuse of the slag heap (Russell Vale emplacement area) to stockpile/store/dump coal and refuse is another example that put people and property at risk.
- With current liabilities exceeding current assets by nearly \$1 billion, and this record of non-compliance, Wollongong Coal cannot be considered a serious and appropriately resourced and skilled enterprise for operating a colliery in a densely populated area and, especially, for mining in the Greater Sydney Water Catchment.
- The Resources Regulator has spent *over 3 years* investigating whether WCL is a "fit and proper" entity to hold a mining license. A proposal should not even be exhibited, and certainly not supported by the Department of Planning when these questions of fitness are still outstanding.

## **Greater Sydney Water Catchment should be protected**

- The subsidence impacts of these first workings are claimed to be minimal, but WCL are gambling with instability of the old, overlying Bulli seam workings. It is too risky and certainly not in the public interest to invite pillar collapse and subsequent subsidence. The ground is still moving from extraction of longwalls 4, 5 and 6. Actual subsidence commonly exceeds predicted subsidence in the mines beneath the Metropolitan and Woronora catchments.
- More than ever, in this time of drought and climate change, Greater Sydney Water Catchment should be protected from damaging extractive industries. The Cataract Reservoir is more than 70% empty and the general public are on water restrictions. The ground and surface water loss of 298 ML year, added to the 146 ML of "upgradient inflow" from adjacent "inactive" mines brings total water draining into the WCL workings of 444 ML/yr. It is not in the public interest to compound and add to water loss from preexisting workings at Russell Vale by allowing this proposal.
- WCL's modelling shows that water will reach the adit in the Illawarra Escarpment in 2057 but outflow will continue to escalate, peaking in 2179. We are stealing from future generations when we lock in water losses with short term planning.
- WCL offers to take responsibility (a "funding arrangement") for water monitoring and treatment for *10 years after closure*. Assuming 5 years of

mining, this leaves 145 years of outflow that needs monitoring, management and treatment. It is irresponsible for us as a society to keep adding to this problem and leave it for future generations to solve the consequences

### **Wollongong Coal has No Approval for Wonga Central Drivage**

- The proponent states that it is not proposing to mine under the Cataract reservoir, yet the Wonga Central Development Main passes under the reservoir. This drivage was in the expired Preliminary Works Project but as the PWP has expired, this drivage requires a new application. It should not be listed in this application as approved (see “Approved Wonga Central Development Mains”, Fig 2.1, p. 20).

### **Climate emergency**

- We are in a climate emergency. This is not the time to be expanding coal mines, particularly mines like Russell Vale; it has high levels of fugitive Green House Gas Emissions and the coal of the Wongawilli seam has a high level of thermal compared to metallurgical coal (approx. 25% of ROM coal from Wongawilli seam is thermal). The carbon footprint of the project is enormous at 11,624,000 t CO<sub>2</sub>-e. The NSW government lags behind in climate action.

### **Russell Vale is no longer a suitable location for a large expanding colliery**

- Population density continues to increase around the Russell Vale colliery; more people will be exposed to the mine’s particulate and noise pollution than ever before. It’s not enough to say “the mine was there first”; it’s no longer the 1800’s, the mine has not been continuously operating and WCL has demonstrated that they are not willing or able to invest in the colliery to bring it up to modern standards.
- I am very concerned about a coal processing plant and coal crushing plant on site at Russell Vale Colliery. As mentioned previously, WCL has a poor record of compliance. The neighboring community should not be subject to the noise and particulate pollution that these new plants entail.

WCL has lost its social license to operate. It has not honored conditions of previous approvals, demonstrates financial and technical incapacity and its fitness to hold a mining license in the state of NSW is questionable. It is time to close and rehabilitate the Russell Vale mine.

I have not made reportable political donations.

Kaye Osborn