Objection to: Russell Vale Underground Expansion Project_ Wollongong Coal

Project No. 09-0013

From: Sharyn Cullis on behalf of Georges River Environmental Alliance

The Georges River Environmental Alliance objects to the proposal to extend any underground mining operations as proposed by Wollongong Coal within the drinking water catchment of Cataract Dam on the following grounds:

The unacceptable threat to water supplies: Water is more important than Coal

Our stakeholder interest is that we are aware that the high rainfall coastal Metropolitan Catchments, (that includes the catchment of Cataract Dam), are the drinking water supply for the Greater Macarthur and Wollongong regions (currently more than 500,000 people). Further though, via the Pheasants Nest and Broughton Pass diversionary weirs and the upper canal to Prospect, they can top up the wider Sydney water supply. We are aware that the current strategic practice of Water NSW especially in drought times is to draw down these Metropolitan supplies, in recognition that the Warragamba is more drought vulnerable being in a drier climatic rain shadow than the coastal catchments. We are also aware that whilst a top up can occur from the distant Tallowa Dam this should be avoided, as Tallowa must be the assured priority supply for the south coast. We also note that the current capacity of Cataract is around 29% whilst that of Cordeaux is around 37%. These dams together are supply a combined population of the Macarthur of more than 240,000 people. However, demand for water supply from these 2 catchments is about to grow exponentially. For example, the Greater Macarthur 2040 Interim Plan for the Macarthur Growth Area (DoPE, 2018) predicts a population growth based on a planned 58, 000 new dwellings excluding those of Wilton.

In summary the Metropolitan catchments, including that of the Cataract which is threatened by this mining expansion, are of vital strategic value for the Sydney drinking water supply now and into the future. We therefore argue that given the risks that underground coal mining pose to water resources, the value of the water within Cataract Dam is of far greater value to society, that any coal revenues that this Wollongong project would yield.

These are the unacceptable water risks that can be predicted but cannot be controlled or ameliorated.

This proposal is based on mining a third coal seam beneath two previously mined seams, with a proponent who admits existing instability as a result of previous mining, future potential pillar collapse and 1-2 surface subsidence. (PPR, pp62-63) Subsidence levels of around one metre have had catastrophic impacts in the past in the Southern Coalfield. Such impacts are

unacceptable, and our contention is that within the drinking water catchments nil impacts is the tolerable level.

It is truly appalling that the predicted loss of ground and surface water resources for the Cataract Dam have been admitted to be 298ml/pa (Geo terra, Groundwater assessment, p. 96) which is the equivalent to the water usage of more than 25, 000 people pa, which is around 10% of the current population supplied in the Macarthur.

Wollongong Coal stands on a record of extremely poor business and ethical risk

In terms of the economic case, given the current mine is in care and maintenance, its contribution to the regional economy is very low, and future employment growth from other economic activity in the Wollongong area can be anticipated. It is now a vibrant place that has, and is growing beyond its historical coal legacy.

Wollongong Coal remains high risk in terms of its business profile, as it is currently being investigated by the NSW Resource Regulator in terms of whether it meets the benchmark of being fit and proper. Further it fails to meet satisfactory benchmarks in terms of ethical and responsible corporate citizenship. It currently has for example 3 major non-compliances in relation to the re-alignment of Bellambi Ck, a failure to remove 200,000 tonnes of illegal coal waste and the failure to hand over dedicated lands to council. It cannot therefore be 'trusted' with an expansion project of this impact.

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