

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 1**

THIS IS IN ADDITION TO MY OTHER (PREVIOUS) OBJECTION  
TO THE ABOVE PROPOSAL.

MY MAIN CONCERN, BEING RESIDENT IN BELLAMBI LANE,  
IS THE INCREASE IN THE NOISE, DUST AND GENERAL  
POLLUTION WHICH IS BOUND TO OCCUR WITH THE  
INCREASE IN COAL MINING AT THE SITE.

THE TRUCKS DELIVERING SAID COAL ARE A HEALTH  
HAZARD WITH ALL THE NOISE AND DUST THEY GENERATE.  
ONE LOOK AT THE WALLS OF MY HOUSE IS AMPLE  
PROOF OF THIS. AND WE INHALE THE STUFF DAILY.

THE REPRESENTATIVE FOR NRE, DAVID CLARKSON, TOLD  
IRRM MEMBERS THAT A LOT OF CLAY WAS BEING MINED  
WITH VERY POOR QUALITY COAL. THIS, IN MY OPINION, IS  
AMPLE PROOF THAT OUR LOCAL WATER SUPPLY IS BEING  
THREATENED.

I have/have not made a reportable political donation. (Cross out whichever does not apply.)

~~I request that my name is withheld.~~ (Cross out if not applicable.)

Yours sincerely,

Name: DESMOND JACOBS

Address: 111 BELLAMBI LANE

Email address: desjacobs@bigpond.com

Date: 29.08.12.



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 1**

I write to object to the acceptance of this proposal as a modification to the Preliminary Works Project MP 10\_0046. The extent and impacts of the proposed additions to the Preliminary Works Project, reflected in the increased coal volumes and the use of documentation from the (withdrawn) expansion project, make it clear that this proposal cannot sensibly be regarded as simply a modification to the Preliminary Works project. Gujarat NRE (GNRE) is attempting to incrementally establish their expansion project.

Given its errors and omissions, the Environmental Assessment Report (EA) for the current proposal is unacceptably misleading and confusing. That it has been released to the public reflects poorly on the Department of Planning and Infrastructure (DoPI). Furthermore, the DoPI failed to identify and act upon a number of non-compliance matters and it was left to community members to point out the failures in a series of complaints. While the DoPI clearly goes out of its way to accommodate the interests of the proponent, it seems it acts on the concerns of the public with great reluctance. The EA and its associated documentation contain a large amount of material for which the general public were given only three weeks to respond. Requests for an extension to the public comment period were refused.

I also strongly object to the proposal for the additional reasons given below.

**Longwall mining under the Sydney Water Catchment Area poses unacceptable risks to our water supply**

The extraction of coal from Longwalls 4 and 5 will cause subsidence within an area that includes Cataract Creek and several upland swamps. Cataract Creek has been recognised by the Planning Assessment Commission (PAC) as having "*highly significant values*" making it "*worthy of protection*" (Bulli Seam Operations report, 2010). Subsidence impacts on swamps, surface waters and groundwater has been described in detail in the Southern Coalfield Inquiry report and the PAC reports for the Metropolitan Coal and Bulli Seam Operations (BSO) projects. These reports recognise the importance of swamps both as water stores and filters, and as biodiversity pools of very high conservation value. I note with alarm that the May 2012 end of panel report for Longwall 7 in Dendrobium Area 3A reports serious impacts on swamps 12, 15b and 16. The evidence that swamps cannot be safely undermined is overwhelming. Remediation of swamps is not possible and there are no examples of 'self-healing'.

Swamps CRHS1, CCHS3 and CCHS4 have special significance status under DECCW (now OEH) 2011 draft guidelines, and CCHS3 and CCHS4 include rare Tea-Tree communities. Recommendation 18 of the Metropolitan Coal PAC report includes the following; "*swamps of special significance will be protected from negative environmental consequences*". Aboriginal site 52-3-0322 is located on the edge of CRHS1 and Aboriginal site 52-3-0320 is on the edge of CCHS3. CCHS3 and CCHS4 overly Longwall 5 and CRHS1 is within the subsidence zone of Longwall 5. Approving Longwalls 4 and 5 would approve the loss of these swamps.

Residents are also exposed to noise pollution from colliery operations and trucking. Countless complaints about noise remain unresolved.

### **Greenhouse Gas Emissions**

The coal seams of the Illawarra are known to be gassy and typically release 10 or more cubic metres of gas for each tonne of extracted coal. The composition of the gas varies from being primarily methane to primarily carbon dioxide. Assuming all of the fugitive gas is carbon dioxide, a considerably weaker greenhouse gas than methane, the coal to be extracted under the current proposal would add 32,000 tonnes of carbon dioxide to the 44,000 tonnes of fugitive carbon dioxide released by the Preliminary Works project. Combustion of the extracted coal would further add 4.8 million tonnes of carbon dioxide emissions to the 6.6 million tonnes of carbon dioxide emitted from combustion of the coal from the Preliminary Works project

### **GNRE has demonstrated that it does not have the capacity and resources to operate this colliery**

Since the Preliminary Works approval GNRE have proved that they are not capable of self-regulation. They have failed to even comply with basic conditions imposed on them by DoPI and the PAC, including: implementing management plans for noise, air quality, greenhouse gas emissions, traffic, biodiversity, water, heritage, and many more areas by the due date of 13 April, 2012 (still outstanding at the end of August 2012). Their implementation of a Community Consultation Committee or approved alternative was months overdue. The EAs account of the so called consultation process is highly misleading.

It appears that extraction of longwall 4 (a component of this Modification application and an activity that is already virtually completed as a result of another very controversial approval process) has been problematic, due to longwall misalignment and that this error has resulted in the contamination of all the extracted coal. Not only is the subsidence much greater than predicted, the extracted coal has little value.

GNRE does not appear to have the resources, or the will to bring the antiquated infrastructure at No. 1 Colliery up to modern standards. Irrespective of the drawbacks or merits of this proposal, GNRE is not an appropriate corporation to extract this coal or operate this colliery.

I recognise that jobs and royalty revenues may be lost with the rejection of this entirely unacceptable proposal. (Although, I note that this modification cuts jobs from the Preliminary works commitment by about 100 jobs or a third of the No.1 Colliery workforce.) 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 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.

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~~I request that my name is withheld.~~ (Cross out if not applicable.)

Yours sincerely,

Name: DESMOND JACOBS

Address: 111 BELLAMBI LANE BELLAMBI

Date: 28.08.12.