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## **Submission: Wongawilli Coal Mine, MOD 2 - NW Mains Development**

Thank you for the opportunity to make a submission on this project. Lock the Gate Alliance opposes this modification / development.

Our submission, in summary, is that this project should not go ahead for reasons including:

- neither Wollongong Coal nor their majority-owner Jindal Steel and Power are 'fit and proper' entities
- new coal mine projects in the Special Areas create further risks to water catchment integrity and should not be permitted
- this project seeks to supply markets outside of Australia and will therefore make no contribution to ongoing supply to Bluescope Steel
- annual greenhouse gas emissions in excess of 6.5 Mt CO<sub>2</sub>-e are unacceptable and will likely not be significantly mitigated nor offset.

## **Wollongong Coal is not 'fit and proper'**

Neither Wollongong Coal nor their majority-owner Jindal Steel and Power are 'fit and proper' entities. This being the case, they should not be mining in the state of NSW, particularly inside a sensitive water catchment Special Area.

Lock the Gate Alliance and the Illawarra Residents for Responsible Mining (IRRM) have produced a report on these matters as a resource for consent and planning authorities and for regulators. The February 2021 report - Environmental History of Wollongong Coal vis a vis Russell Vale (EPBC Ref: 2020/8702) - can be found online here:

[https://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/7150/attachments/original/1613540306/Environmental\\_History\\_of\\_Wollongong\\_Coal\\_EPBC\\_Ref\\_2020\\_8702.pdf?1613540306](https://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/7150/attachments/original/1613540306/Environmental_History_of_Wollongong_Coal_EPBC_Ref_2020_8702.pdf?1613540306)

## **New coal projects in the Special Areas should not be permitted**

The Colliery and MOD2 is within the Upper Nepean catchment, which forms part of Sydney's drinking water catchment and designated as Metropolitan 'Special Areas'.

The approved and proposed first workings of the NWMD are located predominantly within the Lake Avon reservoir catchment of the Metropolitan Special Area.

This area is one of the most sensitive areas in NSW and is highly-valued by the Illawarra and Greater Sydney communities. The primary purpose of the drinking water catchment is to provide clean, safe drinking water. This must be protected. Continued approval of additional coal mining is incompatible with catchment protection.

In addition, we note concerns and an objection raised by WaterNSW back in 2015 that this development may place pressure on authorities to "approve future mining projects which could compromise water quality and quantity" and that there may be a risk that water from Avon Reservoir may drain into mine workings.<sup>1</sup> WaterNSW also complained of the piecemeal nature of planning for this mine. Lock the Gate Alliance shares these concerns. If Wollongong Coal has an aspiration to mine long-term in new and additional areas of the Special Area of the catchment, these plans should be assessed via a state-significant development application that includes a public hearing. Approval via modification risks ongoing, incremental, cumulative damage to the catchment.

## **We note that this project proposes to contribute zero coal supply to Bluescope Steel**

The proponent acknowledges that this project seeks to supply markets outside of NSW and Australia with coal for steel making and power generation.

## **Annual GHGEs in excess of 6.5 Mt CO2-e are unacceptable**

Annual greenhouse gas emissions in excess of 6.5 Mt CO2-e are unacceptable.

The project's Air Quality and Greenhouse Gas Assessment suggests that this will be a "gassy" underground mine. 357,761 t CO2-e of Scope 1 fugitive emissions is a very significant volume of GHGEs. It is highly likely that these emissions will simply be vented to the atmosphere, with no offsets proposed by Wollongong Coal or required by NSW DPIE.

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<sup>1</sup> WaterNSW, 7 July 2015, Wongawilli Colliery Continued Operations Project Modification Application – Nebo Area, Application Number, <https://www.planningportal.nsw.gov.au/major-projects/submission/437981>

**Table 7.9**      **Estimated annual GHG emissions – 2 Mtpa operations**

Emission sources	Scope 1 (t CO <sub>2</sub> -e/year)	Scope 2 (t CO <sub>2</sub> -e/year)	Scope 3 (t CO <sub>2</sub> -e/year)
Diesel combustion	136	-	7
Fugitive emissions from mining	357,761	-	-
Post-mining emissions	3,400	-	-
Electricity consumption	-	22,029	2,448
End use of product coal	-	-	5,521,200
Transport of product coal via rail	-	-	756
Transport of product coal via ship	-	-	604,800
<b>Total</b>	<b>361,297</b>	<b>22,029</b>	<b>6,129,211</b>