

**Submission to the New South Wales Department of Planning and Environment  
re Dendrobium Mine Extension Philip Laird, June 2022**

This submission is of four parts: comments of a general nature; reservation of coal resources to support steel making in Australia; the potential impact on the proposed Maldon Dombarton rail link; and, that relating to the rail transport of coal and road haulage of coal waste.

1. As a resident of Wollongong, I note on the one hand the importance of coal to the functioning of the Port Kembla steel works, and on the other hand, the potential adverse impacts on the environment, the Sydney and Wollongong Water Catchment Area, Aboriginal heritage and greenhouse gas emissions.

It is vital that the integrity of this Water Catchment Area is retained. This includes wetland swamps and it would not be unreasonable to completely preclude the use of long wall mining

There is a need for Aboriginal heritage to be fully respected.

In addition, special efforts are needed by the Department in assessing this application that greenhouse gas emissions will be reduced by 2030, in line with NSW and Australian government commitments. This will require special attention to methane gas emissions.

Furthermore, I consider that a proposal such as the amended one should be referred to the Independent Planning Commission.

2. My second issue relates to ensuring that not only the Bluescope steel works at Port Kembla but also that the Whyalla steel works has enough coking coal to continue operating to at least 2050. This raises a number of questions, including what type of coal will be produced at Dendrobium in the future. I would be grateful if the Department would give close consideration to the imposition of consent conditions that would restrict all future coal production from any expansion of Dendrobium mine to be reserved for Australian steel production in both Port Kembla and Whyalla.

3. The third issue is the potential impact of the proposed new mine workings on the long overdue 35 km Maldon Dombarton rail link. The Planning Secretary's Assessment Report Requirements include how "the development would interact with the Maldon to Dombarton rail corridor and an assessment of the risks to rail assets and the future operational capacity of

the corridor from mining operations, undertaken in consultation with the asset owners.

Yet the 2022 EIS on exhibition in its Executive Summary only refers to Maldon in a map (showing intersection with potential mining areas 5 and 3 B) and the more detailed Environmental Assessment does not appear to mention Maldon at all. This raises some questions. One of the applicants 2020 documents called the Maldon-Dombarton railway corridor “disused”. This is simply not correct, as Transport for NSW in 2017 in its 40 years vision for regional NSW transport includes the “ Maldon to Dombarton link to meet future port demands.”

It is of concern that one of the 2020 documents conceded that there could be a maximum predicted total vertical subsidence of 1450 mm impacting the potential new railway. Has this been addressed.

The Department’s attention is drawn to the 2020 comment of Wollongong City Council on the need for the new railway and that the integrity of the Corridor be preserved.

In addition, as noted in part by Neighbourhood Forum Five (in its May 2022 Agenda paper) that operates under the auspices of Wollongong City Council

The heavy rains in March and April 2022 have led to impacts on the South Coast line, around Otford requiring the extended cancellation of some passenger trains and replacement by buses between Waterfall and Thirroul. The line was closed in April 2022 to allow essential and substantial maintenance and repairs.

The Moss Vale Unanderra line which is now part of the Interstate Network managed by Australian Rail Track Corporation (ARTC) was closed for routine maintenance for two days in January 2022 is understood to now require further maintenance to deal with the recent heavy rains. In normal times freight trains that use the Moss Vale Unanderra line could be diverted to the South Coast line. However, with problems on the South Coast line, this is not so easy.

The recent rains highlight the capacity and other constraints on the South Coast and Moss Vale Unanderra lines, and demonstrate the desirability of completing the Maldon Dombarton link.

4. My fourth issue relates to the haulage of coal waste on public roads. Here, there is a question as to what route shall be used, the sensitive Harry Graham Drive, or up the Mt Ousley Road, as it gets from near Mt Kembla to the Westcliff coal waste area.

There is an appreciable unrecovered cost of pavement wear and tear due to bulk haulage. Here, the difference between New Zealand user pays mass distance charging and current Australian registration and fuel taxes is about one cent per net tonne km.

There are other external costs including road crash risk, pollution, noise and road congestion. These have not been adequately addressed by either the Proponent or the Department will at least consider these costs.

External costs were addressed by IPART in its 2012 *Review of Access Pricing for the NSW Grain Line Network*. One estimate from this review is articulated trucks moving in urban areas imposes external costs of 3.88 cents per net tonne kilometre and 2.79 in non urban areas.

Between near Mt Kembla and Appin, the coal waste trucks will move along 14 kilometres of highways in urban areas and 32 in non urban areas. So **for each tonne of coal waste hauled by truck is a hidden subsidy of about \$1.44**

It is submitted that if the proposal is conditionally approved, a further conditions could well include a curfew on coal waste movements, similar to that proposed for the movement of coal by for the Russell Vale coal mine extension, a conduct code for drivers, a trucks be fitted with tachographs and be modern trucks without noisy engine brakes; also, that the mine owner make a contribution to Roads and Maritime Services of at least one dollar per tonne a tonne to cover the additional road wear and tear caused by the road haulage of coal, and to assist in improving road safety along the route and measures to better control heavy truck noise.

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