

This submission **objects to the revised proposal** by Illawarra Coal Holdings (South 32) to expand the Dendrobium Mine in the water catchment serving Wollongong and Sydney. The objection is based upon the disregard of the decision by the IPC to reject the original submission, flawed reasoning for converting the Dendrobium mine to State Significant Infrastructure, and large number of negative impacts that the proposed expansion will have.

1. **Disregard of original decision by IPC** to reject the proposal to expand the Dendrobium mine. Where coal mines are concerned, very few decisions by the IPC are in favour of local communities. The decision to reject the original proposal to expand Dendrobium mining was based partly on a very large number of submissions from local community, along with a large number of contributions from expert scientists and engineers. This process was an independent process and should have been the end of it. That South 32 did not like this decision and has since showed disregard for the very extensive objection to their proposal is evident in the fact that they did not withdraw their original proposal but pushed it along the process to be considered by the Land and Environment court in parallel with this revised proposal they submitted.
2. Meanwhile, with the help of politicians South 32 have had their mine status changed in an unprecedented way from State Significant Development to State Significant Infrastructure, so that their case can not only be heard again but be considered only by the Minister of Planning, Infrastructure and Environment. **The argument that metallurgical coal is ‘essential’ to BlueScope manufacturing of steel is plainly wrong** given that BlueScope source their coal from several mines at significant financial advantage to them. As for South 32, only a small percentage (~10 %) of metallurgical coal they extract from Dendrobium is sold to BlueScope. Thus the ‘essential’ nature of the mine to supply coal to BlueScope is highly questionable. Moreover, even without mine expansion, there is at least 10 years of metallurgical coal supply from the Dendrobium mine to BlueScope. Having spoken with people who work in the local coal mining industry, these people say that the 20-year extension of life of the Dendrobium mine implied in the South 32 proposals is not going to happen because of the growing international pressure on Australia to transition quickly to renewable energy supplies. What is ‘essential’ for BlueScope is the requirement to move quickly away from coal-powered steel production towards ‘Green Steel’ production, and market and broader political forces will facilitate this transition very rapidly. With appropriate State and Federal government support, vigorous pursuit of this transition by BlueScope would rapidly reduce consumption of Dendrobium coal, meaning that existing Dendrobium reserves of metallurgical coal would more than satisfy BlueScope’s requirements over the period to full production of Green steel.
3. Whether it be the original or revised proposal to expand the Dendrobium mine, there are a large number of negative impacts which just make this proposal absurd. For a start, only in NSW does a government allow such mining in the water catchment. The existing negative impacts are profound and the future negative impacts will be worse. For example, cracking and dewatering of watercourses, swamps and aquifers in the Sydney water catchment near coal mines has been documented extensively - <https://www.waternsw.com.au/water-quality/catchment/mining> – and is expected to add the loss of many more millions of litres of water each day to the 10 million litres daily water loss from Dendrobium’s current and past mining. Expansion of the Dendrobium mine and its long-wall mining technique to within just a few hundred meters of the Avon Reservoir with Cordeaux catchment nearby will irreversibly damage the ability of the

water catchment to collect, clean, and store water and undermine the sustainability, resilience and quality of the supply of drinking water for Sydney and Wollongong.

There are many additional impacts of the mine which are concerning, including but not limited to: a) destruction of aboriginal cultural heritage; b) weakening of koala habitat (**now an endangered species!**); c) loss of upland swamp ecosystems which are so important to how the water catchment is created in the first place, the biodiversity of native fauna, and the natural environment which serves to mitigate bushfire risk; d) natural bushfire protection, for which coal mines dramatically increase the risk of bushfires because of the drying effects they have on overlying and surrounding landscapes. This problem related to bushfire risk is more acute along the Illawarra escarpment which is home to a rare and extensive upland swamp habitat which normally acts as fire buffer to the adjacent coastal communities (Wollongong, ShellHarbour, Kiama) but which has been severely degraded by coal mining over the years.

Finally, the climate impacts associated with this single mine expansion are significant, particularly given the relatively high gas concentration of Area 5 compared with other areas already mined. It's been estimated that the Dendrobium Extension Project would result in ~88 million tonnes CO₂-e of GHGs making it one of the highest emitting coal mines in NSW. These emissions will primarily be fugitive methane emissions and it is worth noting that the International Energy Agency has called for the "elimination of all technically avoidable methane emissions by 2030".

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