



Submission: The Dendrobium Mine Extension Project (SSI-33143123)

From: Lane Cove Coal and Gas Watch

To: NSW Department of Planning

Date: 14 June 2022

Thank you for the opportunity to make a submission.

Lane Cove Coal and Gas Watch (LCCGW), a sub-committee of the Lane Cove Bushland and Conservation Society, is a community group formed in 2014 as a result of community concern about the impact of coal and coal seam gas activity in:

Drinking water catchment,
Prime agricultural land, and
Special wild places of New South Wales

LCCGW objected to the Mine Extension for South32's Dendrobium mine proposed in September 2020 because this project directly impacts LCCGW's members as all three affected reservoirs, Avon, Cordeaux and Nepean, supply water to Sydney.

As reported in the objection to the original proposal, LCCGW has conducted community door-knock surveys in the Lane Cove electorate multiple times in the past 5 years. These survey results have consistently revealed that over 90% of residents surveyed wanted a more balanced approach towards coal mining, which included putting a stop to Sydney's drinking water catchment area being undermined by longwall coal mining.

In the September 2020 submission objecting to the project, LCCGW noted several points, such as the summarised items below:

- Loss of water from water courses and swamps that feed the reservoirs, ultimately equivalent to the annual water usage of 123,940 residents of Greater Sydney.
- Short term economic merit prioritised over social and environmental merits:
- Mine merits evaluated on short-term merits only, as opposed to long term impact:
- Proposals to offset catchment land and ecological communities that have been irreparably damaged by mining; but as the catchment area's significance is tied to the geology and geographic location, these offsets are problematic

South32's proposal was ultimately rejected by the Independent Planning Commission.

The revised proposal (SSI 33143123) proposes to limit extraction to Area 5. However, the revised proposal has not alleviated the concerns of LCCGW regarding the many risks that the revised proposal will impose on the environment and water

security. The revised project prioritises potential short term economic gains that undermine long term public interest, including:

- Water loss from the Avon Reservoir, the only water supply source to over 310,000 Illawarra region residents and businesses especially in drought years the impact will be unacceptable. The DPIE reports that it will take 100 years for groundwater levels to stabilise in Area 5. The mine will discharge 13 to 15 litres of water per second for the foreseeable future, long after the 19 years of proposed operation. This discharge water will need to continue to be treated in the long term, posing a cost burden and continued risk.
- Water quality will continue to be compromised through subsidence-induced water course fracture. Continuous monitoring and remediation will risk water quality and impose ongoing cost as well as risk to future generations' drinking water.
- The amended proposal does not acknowledge how South32 will preserve original owners aboriginal cultural heritage. That a private company is not obligated to preserve original owners cultural heritage is not acceptable.
- Koala habitat – Independent scientists face difficulties to ascertain the extent to which endangered koala and other species would be impacted by the expansion. Again, it is unconscionable that a private company's economic prospects should be prioritised over endangered species and ecological heritage.
- Swampland ecosystems. These are essential to the catchment ecosystem as well as to mitigate bushfire impact. This project will impact directly on 15 swamps located above the longwalls, with many connected feeder streams exposed to cracking and drying that will impact water storage and flow. The damage would be irreversible; therefore the extension proposal poses an unacceptable risk.
- The benefit to local employment appears to be overstated, as South32 says that coal from its planned Dendrobium expansion would be suitable for Bluescope's steelworks, despite an earlier hearing by the IPC finding Bluescope was not reliant on this coal.

LCCGW maintains that there should be mining at all within the water catchment area of a metropolitan city, at a time where climate patterns are becoming more erratic, and where water security concerns for the future and the impact to millions of Australians now and in future generations are placed at risk.

The Dendrobium Mine Extension Project (SSI-33143123) is the first coal mine project to be declared State Significant Infrastructure. That a coal mine in a public water catchment in a drought-prone country is State Significant and to be prioritised over the concerns and risks to resources and future economic wellbeing is not acceptable. Furthermore, given that the proponent appears to have been given advice by NSW Department ¹of Planning for its application for SSI we believe the project must be referred to the Independent Planning Commission as part of due process.

¹ <https://www.abc.net.au/news/2022-06-10/dendrobium-foi-reveals-coaching-environmentalists-say-/101135878>

Irregardless, we request that the approval not be granted.

Sincerely,

Lane Cove Coal and Gas Watch.