

To Hon Anthony Roberts MP,

This submission OBJECTS to the Dendrobium Mine Extension Project State Significant Infrastructure Application.

In this submission I address the several aspects of the Environmental Impact Assessment, which either fail to serve the public interest or fail to meet the Planning Secretary's Environmental Assessment Requirements (SEAR).

Summary

I am a resident of Wollongong LGA.

It is shocking to most Wollongong and Sydney residents that mining takes place in our public water catchment. Most people are concerned when they learn that there are current plans to expand the Dendrobium mine for a further 20 years. They are even more shocked when they learn that the Government's Independent Planning Commission rejected an earlier version of this proposal, and that WaterNSW opposes the current proposal. The known negative impacts on the water catchment, as well as the likely risks and possible worst-case risks to the sustainability of our water catchment are completely unacceptable. Nothing could be more important than protecting our water catchment and not committing our region to fossil fuel expansion projects.

Heritage (Point 5)

1. Not a single Aboriginal Registered Party spoke expressed support for this proposal.
2. Aboriginal Registered Parties emphasised their concerns about the integrity of the ecosystem, habitat and not having access to the area to practice spiritual and cultural connection.
3. The ongoing highly restricted access to the area for local Traditional Owners is unacceptable. A multinational mining company's access should not be prioritised.

Water (Point 6)

1. Irreparable damage to the water capturing ecosystems of the Metropolitan Special Areas. There are no rehabilitation methods for subsidence and dewatering of upland swamps. To manage the sustainability of our water catchment it is not enough to set Area 5 back a few hundred metres from the Avon Reservoir. As South32 has stated in the EIS that this proposal will also impact the Cataract and Nepean Reservoirs.

However, the fundamental point is that water is not simply captured in dams when it rains, it is drawn into the dams by a healthy system of upland swamps and small tributaries. Damage these, and we will see enduring and irreparable impacts on our water system.

2. Inability to offset the damage to a highly significant public resource – the water catchment that 5 million NSW residents rely on.
3. At least 8 billion megalitres of total water lost annually to the Dendrobium mine in the current expansion plan.
4. Direct impacts on the Avon Reservoir, which is the only source of water for 310,000 Illawarra residents and businesses. During the drought the Avon Reservoir recorded historic lows, strongly signalling that everything should be done to preserve the current ecosystem not undermine it.
5. Ongoing losses to ground and surface water for at least 60 years according to South32's mine closure estimates (Appendix Q). In South32's initial application the company estimated ongoing losses for 100 years. Even at these likely underestimated figures, it is extremely alarming given recent experience of drought.
6. Known risks of water contamination associated with tailings and sediment overflow. The community has already recently experienced South32's failure to guarantee unpolluted local creeks and tributaries. Brandy & Water Creek has had EPA verified pollution incidents at least twice in recent years. This proposal, if approved, will lead to an increase in metals in the water courses and reservoirs. South32 has shown itself not fit and proper to manage contamination risks in the pasts, and should not be entrusted with our public water catchment.
7. Flow on impacts to the Greater Sydney Water system. Reduced utility of the Metropolitan Special Area water catchment in times when other water catchments, such as Warragamba are contaminated or in low supply.

Bushfire hazard (Point 11)

1. The impacts of the above points on water also relate to bushfire risk. Dewatering the Metropolitan Special Areas will reduce the Illawarra region's bushfire resilience.
2. When the 2019-2020 bushfires were at their peak, local dams were at historic lows. The nearby township of Balmoral in the Southern Highlands (where there is nearby mining at Tahmoor) ran out of water to fight the fires.

Social impacts (Point 15)

1. The limited scope of the social impact assessment submitted in the EIS is truly outstanding. The consultant engaged has barely surveyed the local community at all, and has failed to account for the health and wellbeing impacts of this proposal.
2. Reduced drought and bushfire resilience, increases in heat resulting from climate change (which this mine will irrevocably contribute to) have not been included as social impacts. These oversights are hugely problematic.

Economic impacts (Point 16)

1. The economic justification for this project is based on flawed and limited logic. Ignoring the growing impacts of climate change is no longer acceptable.
2. South32 acknowledges that only (at maximum) 25% of Dendrobium coal will reach the local steelworks. In recent years, Bluescope has only used approx. 13% of coal from Dendrobium (Bluescope annual report, 2018). The argument that the Steelworks depends on Dendrobium coal is clearly not based in fact.
3. The community understands that Bluescope is investing in renewable alternative methods. Furthermore, the CEO of Bluescope has never said publicly that the future of the Steelworks depends on this coal source – a fact backed by the obvious truth that they obtain metallurgical coal from elsewhere already.
4. It should be emphasised that this expansion only promised 50 new jobs. This is a tiny dip in the ocean for Wollongong.
5. The quality of jobs in local mining is deteriorating and mining is not a growth sector in our economy. Indicative of this trend, recent hires at Wollongong Coal's Russell Vale mine were advertised at \$25 per hour. The replacement of secure ongoing jobs with short, casual contracts is pronounced in the sector.
6. As the Economic Assessment Ernst & Young have prepared for this EIS, they admit that there is no evidence that miners will experience disutility as they transition to different employment. No miner that I know in the community expects long-lasting employment in mining. They are already training and looking for other jobs.

Conclusion

I implore the Minister to consider the rationale by which the Independent Planning Commission rejected the first version of this proposal. While the current proposal is a smaller area, all of the projected impacts remain to a scale that is still unacceptable. The costs of this mine are too great, and the benefits too small or are achievable by other means.

Sincerely,
Concerned local resident