

Dendrobium Expansion Project: SSI-33143123

I object to the project. My reasons for objection include:

Severely compromised process

The project was declared SSI based upon spurious claims about the dependency of the Bluescope Ltd (BSL) Port Kembla Steel Works on Dendrobium's coal. This dependency was debunked in the previous project - SSD 8194 - in numerous submissions and confirmed in the IPC's reasons for decision. The Wongawilli seam coal preferred for blending by BSL will be exhausted around 2024 and this new proposal for Area 5 will only yield Bulli seam coal.

Bluescope has alternative sources from coal fields **not in the Schedule 1 Special Areas**. The upgrade of the coal berths at Port Kembla enables imports from around Australia to ensure continuity of supply as the steel works transitions to zero carbon green steel. And hopefully this transition will occur sooner rather than later. BSL confirmed its plan for alternate coal supply in its Commodity Logistics and Import Project Scoping Report, Feb 22ⁱ p. 9:

"BlueScope remains committed to maximising local coal supplies where they are available and suitable but must maintain the quality of its coal blend to avoid the need for increased throughput of coal (which will in turn increase greenhouse gas emissions).

Unless South32's inability to supply 3-seam can be addressed, to maintain the quality of its coal blend, BlueScope will need to blend the existing Appin coal with an alternate third-party coal to produce an equivalent and suitable coking coal blend. BlueScope has not identified suitable alternate coal supply located within NSW"

An independent assessment of the coal needs of Bluescope Steel, as per the request of Independent MP Justin Field to former Planning Minister Rob Stokes more than six months ago, would assure the Minister that BSL does not need Dendrobium Area 5 coal. At the very least the Minister should exercise his powers under the EP & A Act to refer key documents to the IPC for impartial advice.

The DPIE Major Projects unit needs to run an assessment process, not an approval process. The examples of "coaching" of South32 by DPIE staff uncovered by community members are disturbing.

Until transparency and honesty are brought to the assessment of this project, it remains a prime example of the corruption of our democracy, the sell-out of the NSW State government to the coal industry and a sad example of regulatory/state capture.

Economic rationale

As previously mentioned, BSL is not dependent on Dendrobium coal. Only about 12.5% of Dendrobium's output is going into steel at Port Kembla, with 12.5% going into making coke and 75% being exported straight out of the Port. If supplying BSL was so important to South32, it should have reserved more coal for this purpose from its current approved project mining the Wongawilli seam.

The assertion (ES – 13) *"Bord and pillar mining would not be economic for the Project as longwall mining is the only economic primary production method in Australia to use at depths from the surface that are greater than about 200 m"* is misleading. Wollongong Coal's Russell Vale mine, just south of Dendrobium, is using bord and pillar mining in its underground expansion (MP09_0013) and DPIE asserted in its Assessment Report for this project that it **was** economically viable.

Workers in the mining industry need training and support to move to more sustainable industries so that no worker is left behind in the decarbonisation of energy and steel production.

Subsidence

Subsidence of 2-2.5 m is unacceptable in the “protected” Schedule 1 Special Areas of the Greater Sydney Water Catchment.

Water

The project’s impacts on water quality and quantity are unacceptable. As WaterNSW has stated, drinking water capture and storage and underground mining are fundamentally incompatible land usesⁱⁱ. The Special Areas should be off limits to all extractive industries. They should be protected to the centre of the Earth.

Of great concern is the outflow of ground and surface water diverted from the water catchment at the mine portal and LDP 5. There is no known method of sealing the mine portalⁱⁱⁱ and thus the water loss will most likely be in perpetuity.

The Greater Sydney Water Catchment is the source of drinking water for the 5.5 million people of Sydney, the Illawarra and the Blue Mountains. It beggars belief that in the largest city on the driest inhabited continent on Earth, the NSW government neglects to protect the water supply from short term destructive mining interests. Sydney is the only city in the world to allow longwall mining in a publicly owned water catchment.^{iv}

Upland swamps

As an integral part of the water catchment system, the upland swamps should be protected. The Schedule 1 Special Areas should be off limits to extractive industries.

Biodiversity

In an extinction crisis, it is unacceptable to damage and degrade habitat of native species, in particular threatened species.

Up until last year it was thought that there were few koalas in Heathcote National Park however it has since been established that there is evidence of a thriving population. Likewise, there is likely to be a significant population in the project area. This has not been adequately studied or considered by the proponent.

Climate Change

The IPC has said that there should be no new coal or gas; it is irresponsible for the NSW government to approve new mine expansions at this time, particularly such a long term plan to mine Area 5 until 2035.

The DPIE confirmed in its Assessment Report for the recent Narrabri Coal mine expansion that it does not have the policy framework to respond to the need for emissions reductions consistent with the NSW government target. It concluded that reining in emissions from fossil fuel projects could be left to other regulatory authorities and mechanisms. We are yet to see any evidence of what these may be and we would be naïve to assume that *post approval* coal mines will be able to regulated to reduce emissions.

This project could become the 4th highest emitting coal mine in NSW. It is unacceptable to be approving new expansions when we are in an escalating climate crisis.

Bushfire risks

By changing hydrology and desiccating the Special Areas, the project would increase bushfire risk in the Illawarra.

In summary

South32 will profit if this project is approved. However, it is ludicrous that a **publicly owned water catchment** should be risked, compromised, and degraded to increase the profits of a private company. The responsibility of the government of NSW is to act in the **public interest**.

This project is not in the public interest. I urge you to reject it.

ⁱ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PDA-36073707%2120220204T005757.754%20GMT>

ⁱⁱ Transcript of Proceedings, INDEPENDENT PLANNING COMMISSION PANEL MEETING WITH WATERSNSW RE: DENDROBIUM, 26.11.2020, p 6, Accessed 6.4.21 at:

<https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2020/dendrobium-extension-project/watersnsw-meeting-transcript.pdf>

ⁱⁱⁱ INDEPENDENT PLANNING COMMISSION - PANEL MEETING WITH THE INDEPENDENT PANEL FOR UNDERGROUND MINING (IAPUM), 14.12.2020

<https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2020/dendrobium-extension-project/iapum-meeting-transcript.pdf>

^{iv} On measuring the cumulative impacts of activities which impact ground and surface water in the Sydney Water Catchment, NSW Chief Scientist & Engineer, May 2014, P A-27, Accessed 6.4.21 at:

http://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0007/44485/140530_SCA-Report-Final-Combined.pdf