

GUNNEDAH OPEN CUTS
4.1 MTPA COAL HAULAGE INCREASE MODIFICATIONS
SUBMISSIONS REPORT



JUNE 2026

EXECUTIVE SUMMARY

Wholly owned subsidiaries of Whitehaven Coal Limited (Whitehaven) operate the following open cut coal mining operations located in the Gunnedah Coalfield, in New South Wales (NSW), referred to as the Gunnedah Open Cuts (GOCs):

- Tarrawonga Coal Project (Tarrawonga Coal Mine [TCM]) (Project Approval [MP11_0047]) – approved under Part 3A of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) on 22 January 2013 (proponent is Tarrawonga Coal Pty Limited [TCPL]);
- Vickery Extension Project (Vickery Coal Mine [VCM]) (Development Consent – State Significant Development [SSD] 7480) – approved under Part 4 of the EP&A Act on 12 August 2020 (proponent is Vickery Coal Pty Ltd [VCPL]); and
- Rocglen Extension Project (Rocglen Coal Mine [RCM]) (Project Approval [MP10_0015]) – approved under Part 3A of the EP&A Act on 27 September 2011.

Whitehaven, and its subsidiaries TCPL and VCPL, have identified an opportunity to increase the cumulative run-of-mine (ROM) coal haulage limit from the currently consented 3.5 million tonnes per annum (Mtpa) to a total of 4.1 Mtpa for calendar years 2026 to 2030, without constructing the Kamilaroi Highway overpass (the Modifications). The 0.6 Mtpa increase to hauled ROM coal would apply to the southern section of the Approved ROM Coal Transport Route (Figure 1).

The period for the proposed Modifications to 2030 aligns with the currently consented life for both the Whitehaven Coal Handling Preparation Plant (DA 0079.2002) (which processes the GOC mined ROM coal) and the TCM (31 December 2030) and would align the relevant GOC sites conditions to consistently refer to a calendar year timeframe.

No modification of the RCM Project Approval (MP10_0015) is proposed as the site has been rehabilitated and is in a monitoring and maintenance phase.

Whitehaven prepared a Modification Report (Whitehaven, 2026) to support the applications to further modify TCM Project Approval (MP11_0047) and VCM Development Consent (SSD 7480) under section 4.55(2) of the EP&A Act.

The Modification Report was lodged with the NSW Department of Planning, Housing and Infrastructure (DPHI) on 14 April 2026 and placed on public exhibition by DPHI from 21 April to 6 May 2026. During this period, government agencies, local councils, organisations and members of the public were invited to provide submissions on the Modification Report to DPHI.

A total of 14 submissions on the Modifications were received during the public exhibition period, comprising four submissions (29 percent [%]) from government agencies and local councils, one submission (7%) from organisations and nine submissions (64%) from members of the public. Of these submissions:

- four submissions (29%) were in support of the Modifications, all from members of the public;
- six submissions (42%) objected to the Modifications, five of which were from members of the public and one from an organisation;
- four submissions (29%) were comments, all from government agencies and local councils;
- three public and organisation submissions were received from within Narrabri and Gunnedah Local Government Areas (LGAs) (30%), two were in support (67%) and one objected (33%); and
- seven were received from within the state of NSW (70%).

Key matters raised in submissions included:

- Procedural:
 - Approvals pathway.
- Economic, environmental or social impacts:
 - Transport and management.
 - Greenhouse gas emissions and climate change.
- Issues beyond the scope of the Modifications:
 - Coal mining.

This Submissions Report provides responses to issues raised by submissions from government agencies, the local councils, organisations and members of the public during the exhibition period for the Modification Report and has been prepared in consideration of the *State significant development guidelines – preparing a submissions report* (DPHI, 2026).

The Submissions Report provides an analysis of the submissions received, summarises the actions taken since lodgement (including additional engagement activities) and provides responses to issues raised and an updated evaluation of the Modifications.

In weighing up the main environmental impacts (costs and benefits) associated with the Modifications as assessed and described in the Modification Report and this Submissions Report, the Modifications are, on balance, considered to be in the public interest.

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1 INTRODUCTION

1.1 BACKGROUND

Wholly owned subsidiaries of Whitehaven Coal Limited (Whitehaven) operate the following open cut coal mining operations located in the Gunnedah Coalfield, in New South Wales (NSW), referred to as the Gunnedah Open Cuts (GOCs):

- Tarrawonga Coal Project (Tarrawonga Coal Mine [TCM]) (Project Approval [MP11_0047]) – approved under Part 3A of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) on 22 January 2013 (proponent is Tarrawonga Coal Pty Limited [TCPL]);
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- Rocglen Extension Project (Rocglen Coal Mine [RCM]) (Project Approval [MP10_0015]) – approved under Part 3A of the EP&A Act on 27 September 2011.

Whitehaven, and its subsidiaries TCPL and VCPL, have identified an opportunity to increase the cumulative run-of-mine (ROM) coal haulage limit from the currently consented 3.5 million tonnes per annum (Mtpa) to a total of 4.1 Mtpa for calendar years 2026 to 2030, without constructing the Kamilaroi Highway overpass (the Modifications). The 0.6 Mtpa increase to hauled ROM coal would apply to the southern section of the Approved ROM Coal Transport Route (Figure 1).

The period for the proposed Modifications to 2030 aligns with the currently consented life for both the Whitehaven Coal Handling Preparation Plant (CHPP) (DA 0079.2002) (which processes the GOC mined ROM coal) and the TCM (31 December 2030) and would align the relevant GOC sites conditions to consistently refer to a calendar year timeframe.

No modification of the RCM Project Approval (MP10_0015) is proposed as the site has been rehabilitated and is in a monitoring and maintenance phase.

Whitehaven prepared a Modification Report (Whitehaven, 2026) (herein referred to as the Modification Report) to support the applications to further modify TCM Project Approval (MP11_0047) and VCM Development Consent (SSD 7480) under section 4.55(2) of the EP&A Act.

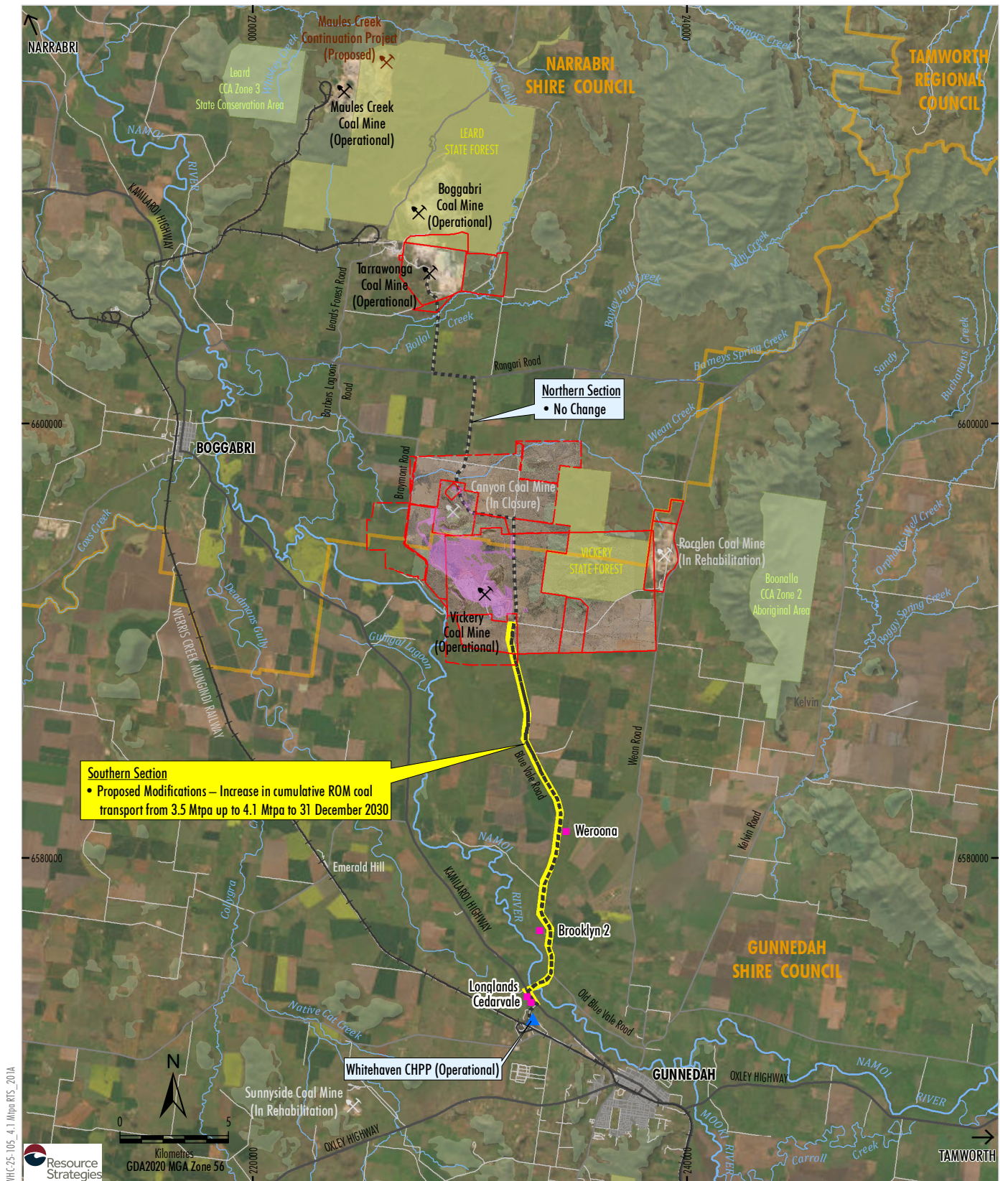
The Modification Report was lodged with the NSW Department of Planning, Housing and Infrastructure (DPHI) on 14 April 2026 and placed on public exhibition by DPHI from 21 April to 6 May 2026. During this period, government agencies, local councils, organisations and members of the public were invited to provide submissions on the Modification Report to DPHI.

On 11 May 2026, the DPHI requested that Whitehaven prepare and submit a Submissions Report for the Modifications (herein referred to as the Submissions Report) in accordance with section 59(2) of the NSW *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).

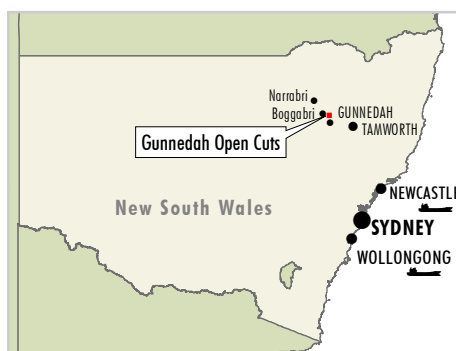
Whitehaven has prepared this Submissions Report to directly address matters raised in the government agencies, the local councils, organisation and public submissions on the Modification Report.

1.2 PROPOSED MODIFICATION AMENDMENTS

Following a comprehensive review of the submissions received on the Modifications, Whitehaven is not proposing to amend any components of the Modifications as presented in the Modifications Report. Continued engagement will occur with Narrabri Shire Council (NSC) in regards to the northern section of the approved haulage route that is beyond the scope of these applications.



Source: Whitehaven (2026); NSW Spatial Services (2024)
Orthophoto: Whitehaven (2024); ESRI Basemap (2025)



- LEGEND**
- Mine Site (Operational)
 - Mine Site (Proposed)
 - Mine Site (In Closure/Rehabilitation)
 - Railway
 - Major Road
 - Local Road
 - State Forest
 - State Conservation Area, Aboriginal Area
 - Local Government Boundary
 - Exploration Licence Boundary (EL)
 - Mining Tenement Boundary (ML, CL)
 - Private Landholders

- Approved Road Transport Route
- Proposed Modifications
- Whitehaven CHPP
- Vickery Extension Project Disturbance Area (as of 31 December 2025)

Whitehaven

G O C M O D I F I C A T I O N S

Proposed Modifications

Figure 1

1.3 STRUCTURE OF THIS DOCUMENT

This Submissions Report has been prepared in consideration of the *State significant development guidelines – preparing a submissions report* (SSD Guidelines) (DPHI, 2026). The structure of the document is as follows:

- Section 2 Provides an analysis of the submissions received during the public exhibition period.
- Section 3 Summarises the actions taken since lodgement of the Modification Report, including additional engagement activities.
- Section 4 Responds to the issues raised in the submissions.
- Section 5 Includes an updated evaluation of the Modifications.
- Section 6 Lists the documents referenced in this Submissions Report.
- Attachment 1 Register of Submitters

2 ANALYSIS OF SUBMISSIONS

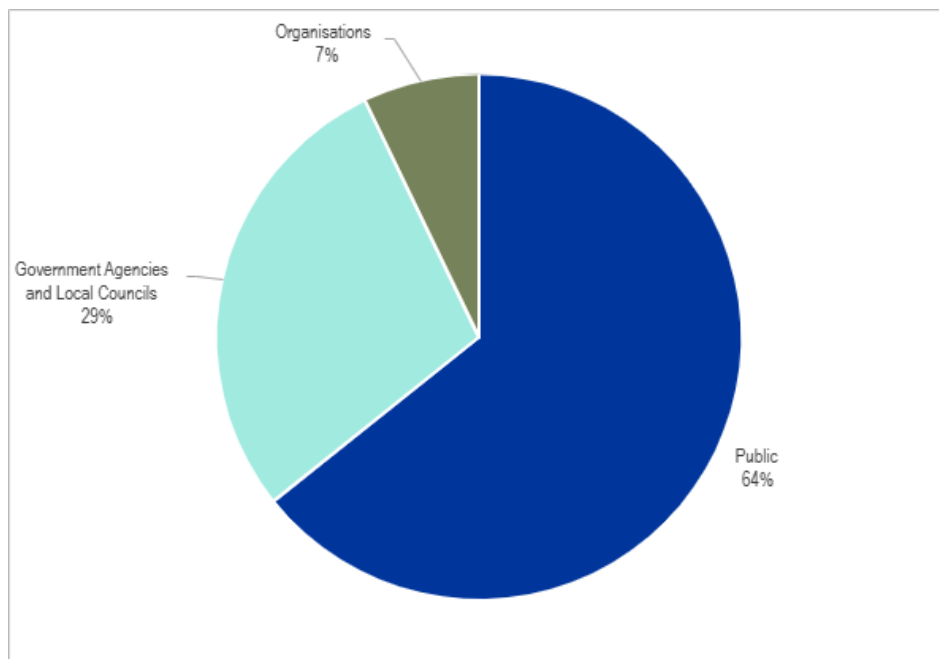
2.1 NUMBER OF SUBMISSIONS

A total of 14 submissions on the Modifications were received from government agencies, local councils, organisations and members of the public.

The following provides a summary of the submissions by submitter category (Chart 1):

- nine submissions (64 percent [%]) received from members of the public;
- one submission (7%) received from an organisation; and
- four submissions (29%) received from government agencies and local councils.

Chart 1
Summary of All Submissions

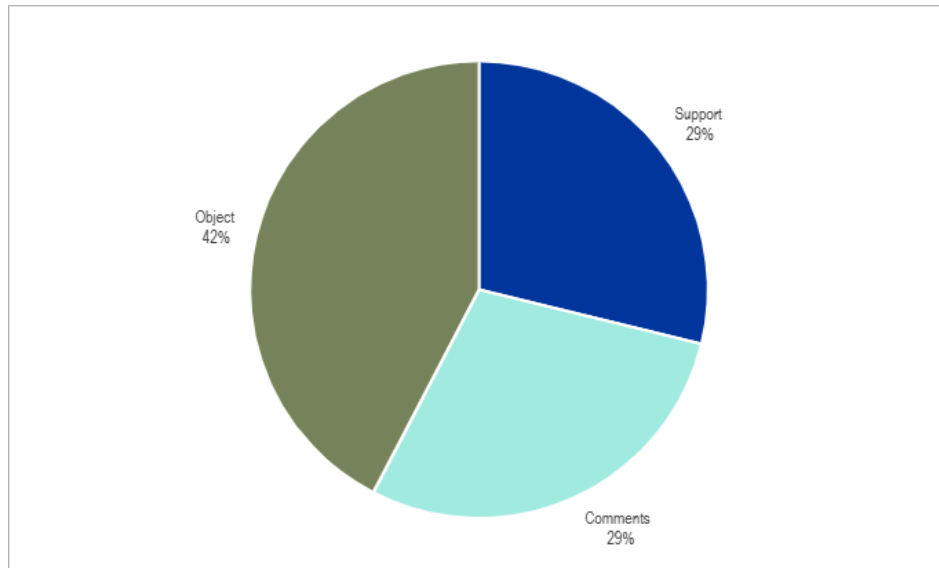


Of these submissions (Chart 2):

- four submissions (29%) were in support of the Modifications, all from members of the public;
- four submissions (29%) were comments, all from government agencies and local councils; and
- six submissions (42%) objected to the Modifications, five of which were from members of the public and one from an organisation.

A register of the submitters is provided in Attachment 1.

Chart 2
Summary of Submission Types for All Submissions



2.2 GOVERNMENT AGENCY AND LOCAL COUNCIL SUBMISSIONS

A total of four submissions were received from government agencies and local councils, including:

- Transport for NSW (TfNSW);
- NSW Environment Protection Authority (EPA);
- Gunnedah Shire Council (GSC); and
- NSC.

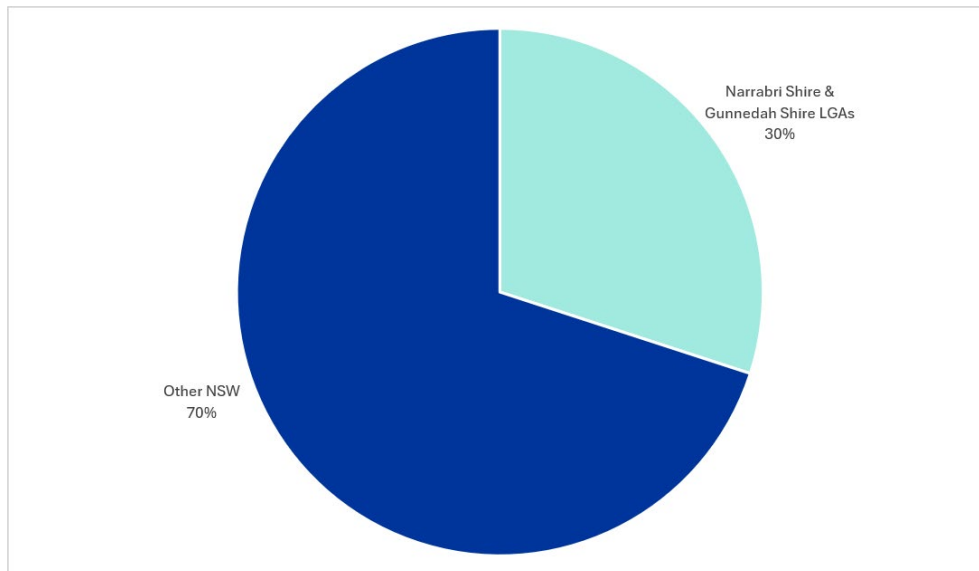
2.3 PUBLIC AND ORGANISATION SUBMISSIONS

A total of one submission was received from an organisation that objected to the Modifications.

A total of nine submissions were received from members of the public consisting of four in support and five objections.

Chart 3 provides a summary of all public and organisation submissions by location. Submissions ranged from areas within the Narrabri Shire and Gunnedah Shire Local Government Areas (LGAs) (30%) and other areas in NSW (70%). A total of three submissions were received from within the Narrabri Shire and Gunnedah Shire LGAs, of these two were in support (67%) and one objected (33%).

Chart 3
Public and Organisation Submissions Received from the Local Community



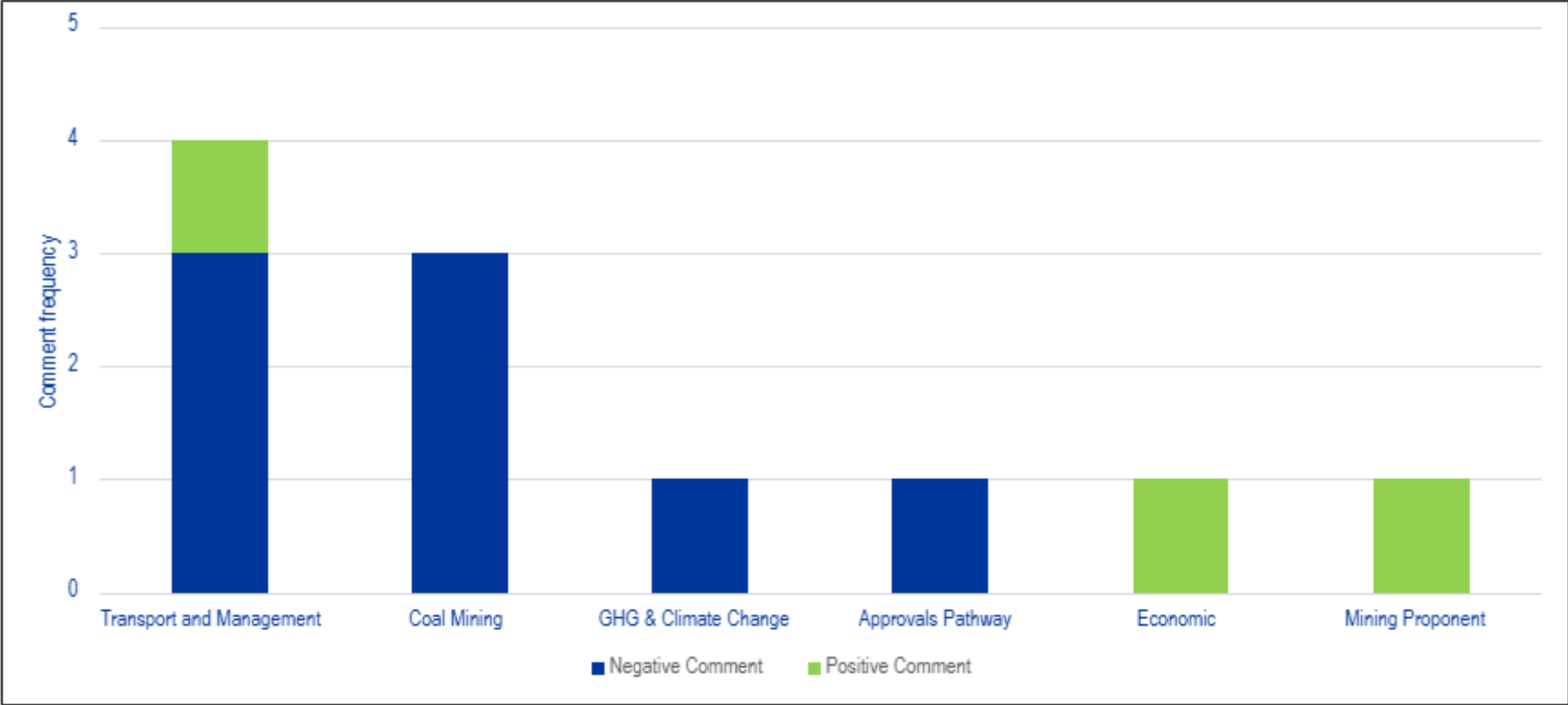
2.4 KEY MATTERS RAISED IN SUBMISSIONS

The most commonly raised matters across the public and organisation submissions are illustrated in Chart 4. The following key assessment matters were raised in the submissions:

- Procedural Matters:
 - Approvals pathway.
- Economic, environmental or social impacts:
 - Transport and management.
 - Greenhouse gas emissions and climate change.
- Issues beyond the scope of the Modifications:
 - Coal mining.

A register of submissions and where each issue is addressed in this Submissions Report is provided in Attachment 1.

Chart 4
Key Matters Raised in Public and Organisation Submissions



3 ACTIONS TAKEN SINCE PUBLIC NOTIFICATION OF THE MODIFICATION REPORT

3.1 ENGAGEMENT ACTIVITIES

Since lodgement of the Modification Report, Whitehaven has continued to engage with key stakeholders, including government agencies, local organisations and community members regarding the Modifications. The consultation with each of these stakeholders is summarised in the following sections.

3.1.1 Relevant Government Agencies

Prior to the public exhibition period for the Modifications, Whitehaven wrote to a number of government agencies and offered project briefings to provide an opportunity to discuss relevant Modification findings. Whitehaven representatives also met with various stakeholders to discuss the proposed Modifications.

NSW Department of Planning, Housing and Infrastructure

Whitehaven has continued to engage with DPHI on the Modifications since lodgement of the Modification Report and to provide updates on the status of preparation of the Submissions Report.

3.1.2 Gunnedah and Narrabri Shire Councils

Gunnedah Shire Council

On 13 May 2026, Whitehaven representatives met with representatives from GSC as part of providing an update on items across the Whitehaven NSW assets, including an update on the Modifications.

Narrabri Shire Council

On 13 May 2026, Whitehaven representatives met with representatives from GSC as part of engagement on items across the Whitehaven NSW assets, including an update on the Modifications.

3.1.3 Other Community Consultation

After the lodgement of the development application, Whitehaven gave public notice of a development application for consent to carry out the Modifications in accordance with sections 98(4)(b) and 98(5)(b) of the EP&A Regulation. The relevant public notice was published in *The Courier* and *Gunnedah Times* on Thursday 16 April 2026. DPHI published a notice of the exhibition of the development application on the NSW Planning Portal under the VEP and TCM tabs, respectively.

Since lodgement of the Modification Report, Whitehaven representatives have also undertaken broader engagement regarding the Modifications, as follows:

- An update was provided at a TCM Community Consultative Committee (CCC) meeting on 13 May 2026 regarding the Modifications.
- An update was provided at a VEP CCC meeting on 14 May 2026 regarding the Modifications and advising of the application process.
- An update to relevant GOC employees regarding the status of the application following submission of the Modification Report.
- Engagement with private landholders in relation to the haulage activities.
- Other engagement with landholders and local industry stakeholders.

3.2 REFINEMENTS AND FURTHER MANAGEMENT AND MITIGATION MEASURES

3.2.1 Refinements

No changes to the Modifications are proposed as a result of Whitehaven's review of the various government agency, organisation and public submissions on the Modification Report.

3.2.2 Additional Mitigation Measures

In response to submissions received on the Modification Report, Whitehaven has determined that no additional management and monitoring measures are required. Notwithstanding, as noted in Section 1.2, Whitehaven will continue to engage with NSC to address their comments regarding a limited segment of the northern haulage route that is neither the subject of the Modification Report, or associated with haulage activity along the southern section of the route from the VEP to the Whitehaven CHPP.

4 RESPONSES TO SUBMISSIONS

4.1 GOVERNMENT AGENCY SUBMISSIONS

4.1.1 Transport for NSW

A submission was received from TfNSW on 26 May 2026 that noted the Kamilaroi Highway is a classified (State) road and as such GSC is the Roads Authority pursuant to Section 7 of the *Roads Act 1993*. TfNSW then made the following two comments for the consent authority to consider in making their determination:

1. *TfNSW support the proposed modification, including the increase of the run-of-mine (ROM) coal haulage limit from the current 3.5 Mtpa to 4.1 Mtpa for the calendar years 2026 to 2030. This increase is supported without the requirement for the construction of the Kamilaroi Highway overpass during this period.*
2. *It is recommended that DPHI consider maintaining consent conditions requiring the overpass if transport exceeds 4.1 Mtpa and retaining the audit requirement, as per existing Condition B84, with a change to audit timing from every five years, to yearly until 2030.*

Whitehaven's response to these comments is provided below.

Response

Whitehaven notes TfNSW's support of the Modifications.

Whitehaven acknowledges the intent of the proposed condition changes, however, Whitehaven believes the intent can be met by undertaking an annual intersection performance assessment (to 2030) aligned with annual traffic monitoring, to be reported in the Annual Review. Whitehaven believes the requirement for an annual external independent traffic audit, as per the current conditions of consent, would be too onerous. As such, Whitehaven would undertake the annual intersection performance assessments to satisfy the intent of TfNSW's proposed amendment to the conditions. This commitment would be incorporated into a revised Traffic Management Plan for the Modifications, subject to any conditions of approval.

Whitehaven would accept a condition requiring the Kamilaroi Highway Overpass to be constructed if ROM coal haulage exceeds 4.1 Mtpa.

4.1.2 Environment Protection Authority

A submission was received from the NSW EPA on 5 May 2026 that noted the road used for haulage is a public road and is not within the premise boundaries for either the TCM or VEP environmental protection licences. The EPA reviewed the Modification Report and noted that no discernible noise impacts will be generated from the increased truck movements and as such, had no further comments on the proposal.

4.2 COUNCIL SUBMISSIONS

NCS and GSC provided their respective submissions with comments on the Modification Report. Responses to the submissions are provided below in Section 4.2.1 and 4.2.2.

4.2.1 Narrabri Shire Council

A submission was received from NSC on 5 May 2026 providing comments on the proposal. Key issues raised relate to traffic and road safety, intersection safety, road specifications and road maintenance responsibilities. NSC also included a set of recommended conditions.

Whitehaven provides the following responses to the key issues raised by NSC within their submission. Whitehaven is committed to continuing its engagement with NSC consistent with recent engagement listed within Section 3.1.2.

Issue**4.1 Traffic and Road Safety – Northern Haulage Route**

Council notes that the Traffic and Transport Assessment largely focuses on the southern section of the road transport route, particularly intersections with the Kamilaroi Highway. Council has concerns that the northern section of the approved haulage route, between Tarrawonga Mine and Vickery Mine, has not been adequately reassessed in light of:

- the closure of Canyon and Rocglen Coal Mines, and
- the consequential concentration of haulage traffic from Tarrawonga and Vickery operations.

Council considers this to be a deficiency in the current Road Transport Assessment, noting that the northern route is experiencing increased traffic loading without a corresponding, holistic review of its ongoing fitness for purpose.

Response

The Modification Report states in Section 6.2 (**bold inserted**):

*The proposed Modifications would seek to increase the ROM coal haulage limit **along the southern section of the Approved ROM Coal Transport Route only** (i.e. between the VCM and Whitehaven CHPP).*

Figure 1 presents the relevant southern section of the Approved Haulage Route.

A summary of the average weekday and hourly trip generation on the Approved ROM Coal Transport Route is provided in Tables 5.1 to 5.3 of the Road Transport Assessment (RTA) (The Transport Planning Partnership [TTPP], 2026) (Appendix A of the Modification Report).

The forecasted ROM coal haulage trips under the Modifications are well below that previously assessed for the GOCs (GTA Consultants, 2012 and 2016), due to increases in the payload capacity of the haulage fleet (Table 5.1 of the RTA [TTPP, 2026]).

Canyon Coal Mine (Canyon) (DA 8-1-2005) was approved to undertake mining operations until 2015 and ceased operations in July 2009. RCM ceased operations in 2019, and its approval conditions relating to haulage limits from the RCM have since been formally removed from Project Approval MP 10_0015 (Modification 5). The transport of ROM coal from VEP commenced in April 2024. ROM coal haulage associated with the Canyon, RCM and VEP operations used/uses only the southern section of the Approved ROM Coal Transport Route, i.e. the private mine access road and Hoads Lane (Canyon); Shannon Harbour Road (RCM); VEP access road and Braymont Road (VEP); Blue Vale Road and Kamilaroi Highway to the Whitehaven CHPP access road. The closure of the Canyon and RCM operations and the commencement of the VEP operations would have had no direct impact on the approved upper limit on ROM coal haulage activity on the northern section of the Approved ROM Coal Transport Route.

ROM coal haulage activity on the northern section of the approved route is limited to that associated with TCM only, which is limited to 3.5 Mtpa. Due to the cumulative road haulage limits imposed under the existing approval conditions, any contribution from the now closed RCM and VEP (commenced 2024), haulage along the northern part of the approved route has been less than the permitted 3.5 Mtpa.

Issue**4.2 Intersection Safety – Goonbri Road and Hoads Lane**

Council notes that a recent consultant report commissioned by the proponent assessed the intersections of the haul road with Goonbri Road and Hoads Lane, including sight distance analysis. That assessment identified that:

- Safe Intersection Sight Distance (SISD) requirements are NOT met at either intersection under existing speed conditions; and
- sight distance failures persist even under reduced speed scenarios in certain directions.

Council further notes that the Local Transport Forum, at its meeting of 30 April 2026, unanimously resolved **not to support** the proposed change from Stop control to Give Way control at these intersections.

Council also notes that lighting required under Condition 53 of the Tarrawonga consent (SSD 11_0047) has NOT been installed on Goonbri Road.

Response

Whitehaven acknowledges the response from NSC and the Local Transport Forum's position with respect to the proposed change of signage and reduction of speed limits at the two intersections. Whitehaven consider this a separate operational matter not associated with the proposed increase to road haulage utilising the southern section of the Approved Haulage Route (Section 6.2 of the Modification Report). Whitehaven is committed to addressing NSC feedback with respect to the relevant intersections and ongoing road maintenance and will continue to engage with NSC.

In respect to lighting required under Condition 53 of the Tarrawonga consent (MP11_0047), the Planning Secretary's Assessment Report for the *Tarrawonga Coal Mine Modification 7 – Life of Mine* (NSW Department of Planning, Industry and Environment, 2021) relevantly states (emphasis added):

The Department has recommended conditions requiring Whitehaven to update the road maintenance agreements and to undertake the required Goonbri Road and intersection upgrades to the satisfaction of Narrabri Council, prior to using the amended transport route.

An Independent Environmental Audit (Environmental Resources Management Australia Pty Ltd, 2023) noted Condition 53 of MP11_0047 was not triggered as the condition was to account for a newly proposed ROM and access point from Goonbri Road that TCM has not proceeded with. Should Whitehaven choose to proceed with the Goonbri Road access point, Whitehaven will undertake these works in accordance with Condition 53 of the Tarrawonga consent (MP11_0047) to enable its use as part of the haul route.

Issue

4.3 Rangari Road – Width and Edge Safety Deficiencies

Council has ongoing safety concerns regarding the section of Rangari Road used as part of the approved haulage route. Council observes that:

- *the road is typically 7.0 - 7.2 metres wide, with 3.3 m travel lanes;*
- *A-double vehicles nominated in the Traffic and Transport Assessment regularly encroach beyond the edge lines due to tail-swing; and*
- *this has resulted in edge drop-offs and edge-break failures, presenting a demonstrated road safety risk.*

Council notes that this condition is isolated to the section of Rangari Road used by the haulage fleet, establishing a direct nexus between haulage operations and the deterioration observed.

Response

Whitehaven has a road maintenance agreement with NSC (as noted in the response to 4.4 below). While the Modifications would not change any aspect of haulage activities on this part of the Approved ROM Coal Transport Route (as noted in the response to 4.1 above), Whitehaven is committed to engaging with NSC to address the road edges at the specific turnout sections of the Rangari Road and Tarrawonga Road intersections.

Any applications for road maintenance works will be sought under Section 138 *Roads Act 1993* through NSC, as previously undertaken (noted in the response to 4.4 below).

Issue**4.4 Road Maintenance Responsibilities**

Council notes that a Road Maintenance Agreement between Council and Whitehaven Coal is in place. Council has concern that the interpretations within the Modification documentation may imply that Council undertakes routine maintenance with costs recovered from the proponent. Council clarifies that:

- *the Road Maintenance Agreement requires Whitehaven Coal to undertake maintenance works identified through joint inspections within defined timeframes; and*
- *Council intervention is intended only as a contingency where the proponent fails to comply.*

Council considers it critical that the agreement be applied and enforced in accordance with its intent, particularly given the proposed increase in haulage tonnage.

Response

Section 2.9 of the RTA (TTPP, 2026) includes reference to the road maintenance agreement with NSC that requires the roads and intersection along the Approved ROM Coal Transport Route within the Narrabri LGA to be maintained in good condition 'at Whitehaven's cost'.

Maintenance works along the Approved ROM Coal Transport Route will continue to be undertaken as required on both private and Council sections, including applications previously made to NSC for approval under Section 138 Roads Act 1993 to facilitate works as required on Hoad Lane intersection, and previously Braymont Road.

As the Modifications relate to a proposed increase affecting the southern portion of the Approved ROM Coal Transport Route from the VEP to Whitehaven CHPP only, Whitehaven will continue to maintain the northern sections as per intent of the existing Road Maintenance Agreement.

Additional Matters Raised by Narrabri Shire Council

NSC has recommended a number of approval Conditions relating to the northern section of the haulage route. The proposed increase in ROM coal haulage is associated with the southern portion of the Approved ROM Coal Transport Route only (i.e. the section of the haulage route that falls within the GSC LGA). Whitehaven is not supportive of NSC's proposed conditions but notes NSC's comments relating to the northern section of the haulage route and will continue to engage with NSC regarding road maintenance matters within the NSC LGA.

4.2.2 Gunnedah Shire Council

A submission was received from GSC on 11 May 2026 noting they had no objection and wished to not make a submission to the exhibition of the Modifications. Whitehaven is negotiating an updated Road Maintenance Agreement with GSC that will be implemented.

4.3 PUBLIC AND ORGANISATION SUBMISSIONS

A total of 10 submissions were received on the Modifications comprising nine public and one organisation submissions.

Four submissions were in support of the Modifications (one in support of the TCM and three in support of the VEP). The submissions were supportive of the socio-economic benefits that the Modifications would provide for the community and Whitehaven's willingness to resolve issues affecting the local community.

Of the 10 public and organisation submissions, six were objections to the Modifications (two objections related to the TCM and four objections related to the VEP). Responses to the themes of these submissions are provided below.

4.3.1 Procedural Matters

4.3.1.1 Approvals Pathway

Issue

One submission raised long standing concerns with 'modification-creep' by proponents.

Response

Section 4.1.1 of the Modification Report outlines the reasons why the Modifications are considered to be 'substantially the same development' when compared to the approved Projects. In addition, Section 3 of the Modification Report (including Table 2) provides an overview of the key elements of the approved operations and the proposed modified operation.

The Scoping Letter submitted to the DPHI on 7 January 2026 for the proposed Modifications (and publicly available on the DPHI's Major Project Portal) sought feedback and confirmation from DPHI on the proposed approval pathway provisioned under Section 4.55(2) of the EP&A Act and the proposed scope of specialist assessments for the Modifications. The legislation enables applications to be sought under section 4.55 of the EP&A Act and are subject to assessment and determination by the relevant assessing authority.

The Modification Report was submitted to DPHI on 31 March 2026 and placed on public exhibition for a two-week period. The Modification Report had been prepared in consideration of the *State Significant Development Guidelines* (DPHI, 2024), *Appendix E – preparing a modification report* (Department of Planning and Environment, 2022).

4.3.2 Economic, Environmental and Social Impacts

4.3.2.1 Transport and Management

Issue

Some submissions stated the proposed increase in coal haulage should not be approved without the construction of the Kamilaroi Highway Overpass, others noted disruptions to road users along the Kamilaroi Highway and others objected to taxpayer funds used to fix the public roads used for coal haulage.

ResponseKamilaroi Highway Overpass

Attachment 4 of the Modification Report – *Context relating to conditioning haulage limits and the Kamilaroi Highway Overpass* describes the historical context of assessment and conditions related to the inclusion of conditions requiring the construction of the Kamilaroi Highway overpass if heavy vehicle movements exceeded assessed thresholds.

As outlined in Section 6.2 of the Modification Report and Appendix A, there would be a reduction in haulage truck movements under the Modifications compared to that originally assessed for the Vickery Coal Project (SSD 5000) and considered by the consent authority when approval was granted for the Vickery Coal Project. This is due to increasing the truck payloads and extending hours of haulage operation by four additional hours on weekdays and Saturdays (excluding public holidays).

Whitehaven commissioned an independent traffic audit in accordance with Condition B84 of SSD 7480. As outlined in Section 6.2.4, McLaren Traffic Engineering and Road Safety Consultants (2026) concluded there were no concerns in relation to the future operational performance of the haulage route, or road safety issues, to and from the GOC operations and its intersection with the Kamilaroi Highway as audited in accordance with relevant conditions of SSD 7480.

“...No concerns were raised in relation to the haulage route to and from Vickery Mine and its intersection with Kamilaroi Highway or the intersection of Whitehaven Coal Gunnedah Coal Handling and Preparation Plant / Kamilaroi Highway as required in SSD7480 Conditions B84 and B85”

The RTA (TTPP, 2026) assessed the heavy vehicle haulage movements forecast for the Modifications.

Intersections and disruption

Section 4.3 of the RTA (TTPP, 2026) assessed vehicle crash history between January 2020 – December 2024 and noted that no heavy vehicle crashes occurred on the Approved ROM Coal Transport Route in relation to the haulage activity. In August 2020, a northbound light truck turning right from Kamilaroi Highway to Blue Vale Road struck a southbound car on Kamilaroi Highway, and a westbound articulated truck waiting to turn right from Blue Vale Road. The articulated haulage truck involved in the crash at the intersection of Kamilaroi Highway and Blue Vale Road was not directly involved in the initial crash.

The results demonstrate that two crashes occurred over five years on that part of the Approved ROM Coal Transport Route that would be impacted by the Modifications. Table 4.3 of the RTA does not highlight any specific location with a clustering of crashes that may suggest an inherent concern with the road layout (TTPP, 2026).

A recent incident in April 2026 involved a truck roll-over at an intersection on the northern portion of the approved haulage route. No injuries or other private vehicles were involved in the incident.

The RTA (TTPP, 2026) found that with the Modifications:

- *the forecast future traffic volumes would be well within the capacity of the roads, and no concerns are raised with regard to the operation of those roads under those forecast demands;*
- *the intersections of Kamilaroi Highway with the Whitehaven CHPP access and with Blue Vale Road would continue to operate at good levels of service, with short delays to drivers and spare capacity; and*
- *no safety concerns are raised with respect to the use of the roads or intersections by traffic associated with the transport of ROM coal from the GOCs to the Whitehaven CHPP, with haulage truck drivers continuing to be subject to the behavioural requirements set out in the TMP, including specific requirements regarding interaction with other vehicles on Kamilaroi Highway.*

The Modifications would result in minimal impact with respect to level of service, network performance and road safety.

Road maintenance

As noted in the Modification Report, Whitehaven has a road maintenance agreement with GSC (refer to Section 1.1.4 of the Modification Report). As noted in Section 4.2.1, Whitehaven has an existing road maintenance agreement with NSC.

The Independent Traffic Audit noted above undertaken by McLaren Traffic Engineering and Road Safety Consultants (2026) included...

"Blue Vale Road is currently subject to an agreement between GSC and Whitehaven, with Whitehaven required to pay 95% of the maintenance costs of the road. The Department supports this ongoing funding arrangement noting that approximately 80% of traffic on the road would be development related, and has recommended a condition requiring Whitehaven and GSC to review their current agreement to reflect the proposed increase in mine-related traffic. ..."

Consultation with GSC is ongoing to develop a revised Road Maintenance Agreement.

In addition, contributions from voluntary planning agreements assists in funding infrastructure maintenance and upgrades within the GSC and NSC LGA's. Section 4.2 of the Modification Report outlines the benefits of the Modifications that include contributions to the local and NSW economy in the form of continued employment opportunities and royalties to the State of NSW. Section 7.4 of the Modification Report includes a justification for approval of the Modifications given they would:

- Maximise the processing at the Whitehaven CHPP within its approved capacity without requiring any changes to current processing infrastructure or additional land disturbance.
- Facilitate ESD, as economic efficiencies can be achieved with minimal change to the currently approved environmental performance conditions and use of existing infrastructure with no increase in the duration of existing impacts of the approved GOCs, or building of the overpass that would create a future liability as it would not have enduring utility for the community and local road network.
- Utilise the increased ROM coal haulage capacity following the adoption of higher payload trucks (while maintaining daily and hourly trips below those originally assessed, including the trigger for the Kamilaroi Highway overpass).
- Be conducted in a manner that incorporates community engagement, with stakeholders consulted through the preparation of this Modification Report.
- Require no changes to the operations conducted across the TCM and VCM sites.
- Result in minimal impact with respect to road safety and road network performance and require no changes to the Levels of Service of the Kamilaroi Highway, Blue Vale Road and relevant intersections (i.e. the roads and intersections continue to operate with spare capacity).
- Result in no additional impact on the acoustic amenity of the surrounding community.
- Ensure consistency across operations and the ability to more flexibly manage haulage across the GOCs given the proposed change for the VCM Development Consent (SSD 7480) to regulate road haulage by reference to the calendar year.

4.3.2.2 GHG and Climate Change

Issue

One submitter raised concerns relating to the extraction and burning of coal.

Response

The Modifications being sought is seeking to haul an additional 0.6 Mtpa of ROM coal along the Approved ROM Coal Transport Route (cumulatively a total of 4.1 Mtpa ROM coal) to the Whitehaven CHPP for calendar years 2026 to 2030. The Modifications do not seek to increase the extraction of approved resource at the TCM and VEP.

A GHG assessment is provided in Appendix C of the Modification Report (Todoroski Air Sciences [TAS], 2026) assessing the projected emissions associated with the increase in coal haulage. The Modifications are expected to result in an incremental increase of 693 tonnes of Carbon Dioxide equivalent (t CO₂-e) (Scope 1) associated with the road haulage activities (TAS, 2026). The change in GHG emissions represents approximately 0.34% of the annual average Scope 1 emissions for the Whitehaven CHPP, the VEP and TCM combined. This remains below the threshold of 25,000 t CO₂-e specified in the *NSW Guide for Large Emitters* (NSW EPA, 2025). Table 3 includes a summary of estimated GHG emissions (t CO₂-e) with a minor incremental change of 170 t CO₂-e associated with the proposed change in haulage.

4.3.3 Issues Beyond the Scope of the Modifications

4.3.3.1 Coal Mining

Issue

Three submissions raised concerns relating to environmental impact created by mining, one objected to fossil fuel development and another raised concerns with the exploitation of resources.

Response

The description of the Modifications in Section 3.1 of the Modification Report describe the proposed increase in the cumulative ROM coal haulage from the approved VEP and TCM from 3.5 Mtpa to 4.1 Mtpa for the calendar years 2026 to 2030 and does not include any proposed modification to approved project disturbance footprints, resource to be extracted or production limits from either the TCM or VEP.

Comprehensive environmental assessments were completed for the approved VEP and TCM addressing potential project impacts and rehabilitation. NSW requires the development and implementation of Rehabilitation Management Plans including Forward Programs to clearly outline progressive rehabilitation. Progressive rehabilitation reporting is provided in response to site Annual Reviews and other annual and company reporting that is made publicly available.

The Modifications are in line with the recently released *NSW Coal Industry 2026-50* (NSW Government, 2026) document that outlines extensions to existing mines will be considered, subject to rigorous and detailed assessment, as included in the Modification Report. As outlined in the Modification Report, based on the outcomes of the environmental assessments, the Modifications would result in 'no or negligible change' to previously assessed and approved impacts and, therefore, would involve minimal environmental impact. In weighing up the impacts and benefits, the Modifications are, on balance, considered to be in the public interest.

5 MODIFICATIONS EVALUATION

A total of 14 submissions on the Modifications were received from government agencies, local councils, organisations and members of the public during the exhibition period for the Modification Report. These comprised four submissions (29%) from government agencies and local councils, one submission (7%) from an organisation and nine submissions (64%) from members of the public.

This Submissions Report provides responses to issues raised during the exhibition period for the Modifications and has been prepared in consideration of the SSD Guidelines (DPHI, 2026).

Since lodgement of the Modification Report, Whitehaven has continued to consult with community members, local businesses, NSC and GSC, DPHI and other government agencies.

No changes to the design of the Modifications are proposed as a result of Whitehaven's review of the Government agency, local councils, organisation and public submissions.

In summary, when compared to the Modification Report, and incorporating the proposed additional management measures for the Modifications, the conclusion in the Modification Report that the Modifications are, on balance, considered to be in the public interest, remains unchanged.

6 REFERENCES

- Environmental Resources Management Australia Pty Ltd (2023), *Independent Environmental Audit 2023 – Tarrawonga Coal Mine*.
- GTA Consultants (2012). *Vickery Extension Project Gunnedah Basin, NSW Road Transport Assessment*.
- GTA Consultants (2016). *Tarrawonga and Rocglen Coal Mines Temporary Road Haulage Increase Modification Road Transport Assessment*.
- McLaren Traffic Engineering and Road Safety Consultants (2026), *Stage 6 Existing Road Safety Audit of Haulage Route*.
- NSW Department of Planning and Environment (2022). *State significant development guidelines – Appendix E - Preparing a Modification Report*.
- NSW Department of Planning, Industry and Environment (2021) *Tarrawonga Coal Mine Modification 7 – Life of Mine*.
- NSW Department of Planning, Housing and Infrastructure (2024). *State Significant Development Guidelines*.
- NSW Department of Planning, Housing and Infrastructure (2026) *State significant development guidelines – preparing a submissions report*.
- NSW Environment Protection Authority (2025) *NSW Guide for Large Emitters*.
- NSW Government (2026) *NSW Coal Industry 2026-50*, published March 2026.
- The Transport Planning Partnership (2026). *Gunnedah Open Cuts Modifications – Road Transport Assessment*.
- Todoroski Air Sciences (2026). *Gunnedah Open Cuts Modifications – Greenhouse Gas Assessment*.
- Whitehaven Coal Limited (2026) *Gunnedah Open Cuts – 4.1 Mtpa Coal Haulage Increase Modifications – Modification Report*.

ATTACHMENT 1 – REGISTER OF SUBMITTERS

Table A1
Register of Submitters

Submitter Category	Submitter	Suburb	Where Comments are Addressed (Section)
Government Agency	TfNSW	Parramatta	Section 4.1.1
	EPA	Parramatta	Section 4.1.2
Council	Narrabri Shire Council	Narrabri	Section 4.2.1
	Gunnedah Shire Council	Gunnedah	Section 4.2.2
Organisation	Wando Conservation and Cultural Centre	Maules Creek	Section 4.3
Public	Name withheld	Eraring	Section 4.3
	Name withheld	Creel Bay	Section 4.3
	Name withheld	Putty	Section 4.3
	Janet Thompson	Birchgrove	Section 4.3
	Name withheld	Creel Bay	Section 4.3
	Daniel Mendes (for TCM)	Chatswood	N/A (Positive Submission)
	Daniel Mendes (for VEP)	Chatswood	N/A (Positive Submission)
	Name withheld	Gunnedah	N/A (Positive Submission)
	Name withheld	Gunnedah	N/A (Positive Submission)