

Clarence Colliery's proposed- MOD 11 (Time Extension) -Gardens of Stone

Main Project- DA504-00 Application Number- DA504-00-Mod-11

Dear Independent Planning Commission

I **strongly oppose** the Clarence Colliery's proposed- MOD 11 Gardens of Stone.

This proposal seeks to extend time operations for another five years. This is at a time when we urgently need to reduce reliance on coal. Approving extended coal extraction is the wrong direction for the Gardens of Stone region and for all of NSW. To put this reason into context, cumulative coal approvals and expansions of existing coal operations must be considered. NSW is the state that approves the most coal extractions in all of Australia. As of May 2025 the NSW Minns Government had already approved six coal mine expansion projects since coming to power in March 2023. These approved projects when combined would be responsible for an estimated 340 million tonnes of climate pollution (lifetime), more than **THREE** times **TOTAL** annual emissions from **ALL** sources. With all these expansions, **cumulatively** vast tracts of habitat is being cleared and destroyed, breaking up wildlife corridors and adding additional stress onto species survival. The mining of coal is **supercharging the climate crisis** and worsening catastrophic weather events like the flooding in recent years that has devastated communities in northern NSW as well as bushfires. The Moolarben Coal Complex OC3 Extension Project near Mudgee has recently also applied for an extension. It is already NSW's **biggest producing coal mine** in its present state and if approved to expand further their operations that would generate an estimated 64.6 million tonnes of greenhouse gas emissions over its life. To say we have enough coal in NSW is an under-statement. Achieving NSW climate targets will be impossible if we keep approving more coal.

The history of Centennial Coal, who operates Clarence Colliery, has faced regulatory scrutiny for discharging pollutants into local waterways in the past. While they work on their ESG strategy (environmental, social and governance practices) there are ongoing concerns regarding its environmental practices and regulatory compliance.

I therefore because of more cumulative damage to nature and our climate oppose the extension of Clarence Colliery's proposed- MOD 11 Gardens of Stone proposal in the Lithgow region.

My reasons are-

1. Mining and burning more coal that is totally unnecessary, prolongs the environmental damage already affecting our waterways, landforms and climate.
2. Coal mining pollution should cease altogether in the Lithgow region so as to protect the waterways that flow into Sydney's drinking water catchment. For years, coal mines have discharged large volumes of contaminated water into local creeks and swamps, damaging endangered wetlands, fragile pagoda formations and downstream waterways. A water treatment plant that was meant to operate as a "zero discharge" system has not delivered on its promise- of course, and weakened water quality rules have left regulators unable to properly enforce environmental protections.
3. Extension of operations for another five years is not going to help NSW achieve its climate targets at all. We urgently must reduce reliance on coal, and stop the approval of expansions in this industry. The Gardens of Stone region is a conservation area deserving of protection and should not be an area devoted to coal mines. Concerns on the environmental impact of these modifications, particularly the discharge of mine waste into Sydney's drinking water supply **MUST** be addressed properly and successfully by Clarence Colliery **BEFORE** approval is even considered. The IPC must refuse consent to these modifications proposed by the proponent and incorporate specific conditions to protect the environment. There are ongoing environmental concerns and the need for responsible mining practices. The five year mining consent extension to 31st December 2031 is therefore opposed.

4. Local and environmental groups have voiced strong opposition, citing lack of transparency and insufficient consultation regarding all these MOD approvals. Approval could further erode community trust in environmental regulation and mining oversight in NSW. Communities in Sydney who depend on clean drinking water delivery are concerned when we know that the disposal of mine waste has contaminated our water supply in the past and that this coal company has been found out.

Only under tighter regulations and enforced compliance and monitoring by the IPC to adhere to 5 strict conditions demanded of this company to action properly, should this project even proceed.

The **Gardens of Stone project MOD 11 is opposed in its current form.** Mining and burning coal prolongs the environmental damage already affecting our waterways, landforms and climate. The proposed MOD 11 extension of the Clarence Colliery, near the Gardens of Stone region in New South Wales (NSW), has raised several environmental, social, and cultural concerns, that includes irreversible damage to these sensitive geological and ecological features of the area and threats to biodiversity because of habitat interference and destruction for several threatened flora and fauna.

If the extension is approved despite community opposition, it must come with these **five strict conditions-**

1. Link approval to the upgrade of the Lidsdale coal unloader. This critical infrastructure would reduce reliance on the polluting, wet Springvale mine. **Toxic pollution in Sydney's drinking water catchment surges far beyond approved limits** as released information in December 2025 testifies.

2. Reject the continued approval of 300,000 tonnes of coal by truck. There is **no** justification for extending years of heavy truck movements through the Blue Mountains and Sydney. Rail is available and should be mandatory.

3. Acknowledge the real impacts of truck transport. The claim of "no or negligible" impacts does not reflect the experience of communities dealing with noise, traffic, diesel pollution and road safety risks from over 7000 truck trips every year. Local communities are impacted NOW and will be further impacted with 5 more years of noise and air pollution and traffic congestion on roads that were NOT built to take this ongoing load of continual use from large coal trucks. These vague terms of 'negligible' are meaningless.

4. Prioritise local use over export. Most Clarence Colliery coal is exported. If extraction continues, it should supply Mount Piper Power Station to avoid pressure for new coal from more damaging mines in the region. We should not be supporting a coal mine in or near a conservation area that extracts coal to be exported to further the companies' financial gain. Any coal mine should be used to benefit domestic markets only. **Approval should ONLY be given contingent on supplying Mount Piper Power Station's needs.** We do **not** want a situation of opening up another coalmine in the same area in the immediate future to service this power station. This is morally wrong.

5. Strengthen rehabilitation requirements. Existing rehab commitments are outdated and inadequate. Any extension must impose modern, enforceable rehabilitation standards.

This is a critical moment. Five more years of coal extraction is not a minor administrative change — it is a **significant** decision for our environment, our communities and the Gardens of Stone.

Centennial Coal, who operates Clarence Colliery recently alleged that from the outset the \$200M Springvale Water Treatment Plant (SWTP) part of the MOD 11 failed to deliver a promised zero-mine waste release system. Energy Australia describes these mine waste discharges as environmental flows. Some dodgy proposals were withdrawn last year, as the Independent Planning Commission saw through what Centennial and others were trying to do with their proposed changes and we thank the IPC for protecting our drinking water. Now the scale of this pollution mess has been revealed, with approvals sought to deal with a proposed waste from **MOD 11 Clarence Colliery of 42ML/day of mine waste generated, every day!**

Prior NSW Governments weakened protection laws to allow this type of water pollution. We urge the Minns Government to now legislate to protect water supplies from mine pollution and fix this pollution mess.

The Gardens of Stone Conservation Area has already faced and continues to deal with a considerable number of changed mining approvals. Some of these proposals have already reintroduced the disposal of mine waste into Sydney's drinking water again. We must **protect Sydney's water supplies, and the World Heritage Area, upland swamps, and pagoda landscapes.**

In context this must be considered as **more cumulative damage** to our drinking water and this precious nearby heritage listed area and this irreplaceable conservation area, the Gardens of Stone.

The local and wider community have 2 requests-

- We call for a moratorium and a strategy for mine waste water management,
- We strongly demand better outcomes for the Gardens of Stone and hold decision-makers to account .

Thank you,