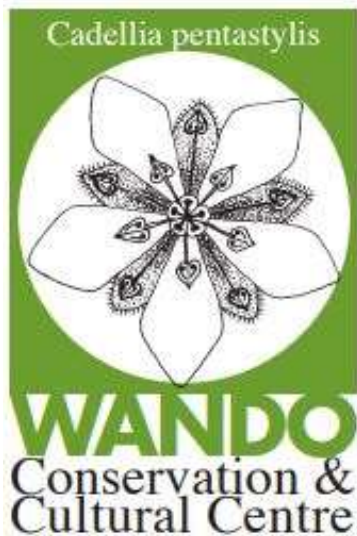




Wando objects to this Modification which involves **increasing the annual combined coal transport limit between 2026 and 2030 to 4.1 million tonnes of coal.**

Even consideration of such an increase must surely be dependent on Whitehaven's having already built **an overpass across the Kamilaroi highway to carry coal to the Gunnedah Coal Handling and Preparation Plant (CHPP)**

Wando Conservation and Cultural Centre Inc (Wando) is a community group based at Maules Creek which was established in 2015 to undertake advocacy and research for the protection of natural resources and cultural heritage in the Namoi Valley region. Wando engages in citizen science, monitoring and compliance activities, participates in Community Coal Committees and produces reports and submissions in relation to environmental and planning issues and matters arising from the operation of extractive industry in the region.

For over a decade we have been concerned at the impact of 'modification creep'; poor compliance and fulfilment of conditions of approval; failure to take adequate account of the cumulative impact of the numerous projects and the apparent manipulation of the planning process by proponents to avoid proper scrutiny of all aspects of projects. Consideration of Vickery Extension Project Modification 3 (SSD-7480-Mod-3) (Mod 3 reveals aspects of each of our concerns. However, time constraints have restricted the considerations presented.

The construction and maintenance of an overpass (a bridge approximately 6.5 meters above the existing Kamilaroi Highway road level) linking the mines to the Gunnedah Coal Handling and Preparation Plant (CHPP) was to be funded by Whitehaven Coal, with approval for such infrastructure dating back to 2013. Whitehaven coal has managed to circumvent this critical infrastructure development through a process of acquiring 'temporary increase' allowances and the creation of an ever higher 'maximum tonnage' of haulage.

This modification sweeps aside this tactic; approval would constitute an egregious example of 'modification creep'.

Notice of the Exhibition from the delegate of the Minister for Planning and Public Spaces has simply: *The modification involves a change to the amount of coal that may be transported along the haulage route.*

However, the Exhibition document from the Department, Housing and Infrastructure (below) reveals there is much more at stake. Indeed, this modification is a text-book

Wando CCC objection to Vickery Extension Project Modification 3 (SSD-7480-Mod-3)

example of **modification creep**- the process by which the NSW Government apparently colludes with a proponent to their advantage and to the detriment of communities and the environment, against the principle of inter-generational equity and the government's own policy targets as outlined in [The Net Zero Plan](#) (*Stage 1: 2020-2030 is the foundation for NSW's action on climate change and goal to reach net zero emissions by 2050*).

EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT MODIFICATION APPLICATION

Vickery Mine Extension Modification 3

Application No	SSD-7480-Mod-1
Location	25 kilometres north of Gunnedah
Applicant	Vickery Coal Pty Ltd
Council Area	Narrabri Shire and Gunnedah Shire
Consent Authority	Minister for Planning and Public Spaces
Description of development consent	
The development consent allows a combined total of 3.5 million tonnes of coal to be transported each year from Vickery and the nearby Tarrawonga Coal Mine to the Whitehaven Coal Handling and Preparation Plant (CHPP) near Gunnedah for processing.	
Description of proposed modification	
The proposed modification involves increasing the annual combined coal transport limit between 2026 and 2030 to 4.1 million tonnes of coal. A modification is also being sought to the Tarrawonga Coal Mine development consent for the same purpose.	

Context of Vickery Extension Mod 3: the Tarrawonga approvals and modifications

Modification creep has allowed Whitehaven coal to avoid the original approval conditions through 'temporary' increases to road haulage allowances and now the strategic re-organisation of Tarrawonga and Vickery Extension into 'Big Vickery'- the term used by Tarrawonga Coal Mine during the Coal Community Committee meeting in November 2025 to describe the changes to infrastructure and workforce management practices to facilitate operations at both Tarrawonga and Vickery Extension with the sharing of infrastructure such as the haulage road from the mine site to the CHPP which includes a stretch of the Kamilaroi Highway.

Approval of the proposed modification involving **increasing the annual combined coal transport limit between 2026 and 2030 to 4.1 million tonnes of coal** must surely be dependent on Whitehaven's **having already built the overpass across the Kamilaroi highway**.

Wando CCC objection to Vickery Extension Project Modification 3 (SSD-7480-Mod-3)

Brief review of Wando's previous submissions concerning haulage as it impacts on the community- the need for an overpass over the Kamilaroi Highway

1. Leard Forest Research Node, an action group of Wando CCC outlined the process of modification creep which was occurring with regard to haulage on the Kamilaroi Highway in 2016 in its [Public briefing- Whitehaven Coal transport developments](#) p.8

This volume of road haulage was never designed to be a permanent arrangement:

- **January 2013** Tarrawonga was granted approval to temporarily transport up to **2 mtpa** of coal by road to Whitehaven CHPP, this was only meant to be for 2-3 years.
 - **September 2014** with the approval of Vickery a cumulative limit of **3.5 mtpa** (for Vickery, Tarrawonga and Rocglen) was set. Above this it was conditional for an overpass being built to take the coal trucks off the Kamilaroi Highway
 - **October 2016** Whitehaven want retrospective approval to breach this limit by 14% for 2016 and to continue this in 2017.
 - In doing so this is creating an unacceptable risk to public safety and increasing the stress on an already over stressed section of roadway.
2. [Wando submitted](#) to Tarrawonga Mine's Modification 11: Haulage Hours and, on p.3 , outlined our concerns:

The community members represented by Wando Conservation and Cultural Centre:

1. Object to extension of hours increasing the cumulative impacts to all road users;
2. Object to extension of hours not having an end date in this response to what has been highlighted as temporary issues;
3. Object to any extension before the Whitehaven Coal-funded Kamilaroi Highway road overpass is put in place. The building of the overpass should be a pre-condition of this modification approval;
4. Object to adding to the cumulative danger due to already approved increased traffic in the area from the WHC Vickery Mine;
5. Object to this Modification using longer haulage hours to fix low availability of drivers. It is false logic that additional haulage hours will create more drivers. What it will create is a more dangerous work environment for the existing workforce. Additional pressure will be applied on existing drivers to drive for longer hours. This is dangerous and life threatening, when combined with an increase in traffic from the early commencement of Vickery and longer hours during the beginning and end of the day.

Wando's recommendation: Any other changes to road haulage hours should only be considered subject to the completion of the Kamilaroi Highway overpass.

This modification was approved 8 October 2025 and *allows for an additional 0.3 million tonnes per annum (Mtpa) of coal to be transported to the Whitehaven Coal Handling and Preparation Plant (CHPP) during the 2025 calendar year, bringing the total combined haulage limit to 3.8 Mtpa*

Wando CCC objection to Vickery Extension Project Modification 3 (SSD-7480-Mod-3)

3. [Wando's submission to Vickery Extension Mod 1](#) deals with a number of aspects of the modification including water impacts, tyre dumping and haulage.

Concerning road haulage Wando concluded:

p. 5 *As you will be aware, B-double trucks laden with 42 tonnes of coal turn left onto the Kamilaroi Highway (speed limit 100km/h) before turning right several hundred metres later into the Whitehaven CHPP*

*We reiterate our contention that **the proposed overpass across the Kamilaroi Highway be required to be completed as previously stipulated before approval of any further haulage***

Conclusion:

From 2mtpa to 3.5 mtpa to 3.8 mtpa to 4.1mtpa- the best time to have called a halt to this egregious approval creep and to insist on the building of the overpass across the Kamilaroi Highway was 2013.

Wando objects to this Modification which involves **increasing the annual combined coal transport limit between 2026 and 2030 to 4.1 million tonnes of coal.**

Even consideration of such an increase must surely be dependent on Whitehaven's having already built **an overpass across the Kamilaroi highway to carry coal to the Gunnedah Coal Handling and Preparation Plant**