

Submission of Objection

Wilpinjong Mod 2 Temporary Workers Accommodation - SSD 6764

Mudgee District Environment Group (MDEG) objects to this Modification to incorporate a temporary on-site workers camp at Wilpinjong Coal Mine. MDEG supports the second part of the Mod 2 Application to excise four parcels of Crown Land from the approved mine boundary area.

Objections to the temporary workers camp cover a range of issues which are presented below. There is no justification for the project, and no social licence and support from the community. The lack of data and specific information is of great concern.

Justification for the project: There is no data or information on the immediate need for accommodation for employees or consultants – i.e. the rationale for the project. The need for accommodation to be provided by the proponent is implied, but no evidence is given.

The Modification Report (MR) p15 describes the close relationship and consultation that occurs between the proponent and Mid-Western Regional Council. The report implies that the workers camp is a welcome and generous move to assist Council in addressing the current critical housing shortage. The reality is that Peabody has been part of creating the housing shortage in the first place. Council's support of the project appears to be contradictory when it has raised objections to the extension of a temporary workers camp at Ulan based on concerns about effluent disposal and other matters. It is perplexing that Council is not concerned about these matters with regard to Wilpinjong Mod 2.

The current approval for Wilpinjong is for mine operations to ramp-down from 2025. This reduced production and activity in the near future strongly indicates that the construction of a temporary workers camp is an unviable, uneconomic and unnecessary expense.

If Peabody wishes to invest then investment should be to the benefit of the local, impacted community, not a temporary workers camp, that will be decommissioned in five years time. A more appropriate investment would be a legacy project, in the form of new permanent housing in Wollar village, that will leave the community in a better state than currently; this would be a valuable outcome for Peabody to strive for.

Social licence: The Modification Report implies that the owners Peabody Energy, are assisting to alleviate the current and increasing housing shortage within the region by building this facility. This argument is disingenuous. Peabody has bought much of the local land and is now the largest landholder, including housing stock, in the surrounding locality and within the Wollar village (MR p22). They have allowed houses to remain unoccupied and unmaintained for many years. A significant number of houses have been demolished and there are plans to destroy more of the

Peabody-owned existing houses. This is not the action of a responsible corporate citizen and in fact, has contributed to the current housing shortage.

The impacts of Peabody's Wilpinjong Coal Mine have been many – not least of which has been the de-population of the district. With many empty houses and the population decreasing, the community fabric has become threadbare. For instance there is no General Store, no School, reduced volunteers for the Rural Fire Service, no vehicle mechanic or servicing – in short, a once-thriving community has been devastated by a very inconsiderate landlord.

If Peabody Energy wishes to contribute to the housing/accommodation supply it must cease the demolition of existing housing and seek to renovate and re-build. This would leave a positive legacy for the community and region, whilst providing an opportunity for Wollar village to re-establish the vital connections that are a significant part of rural life.

Location: The Modification Report (MR) states 'The temporary accommodation facility would be located to the west of the rail loop on an existing (partially rehabilitated) previously mined and backfilled area of Pit 1.' (MR p8). There is no evidence given of the suitability of this substrate for the project.

The land is partially rehabilitated - will the project involve clearing of establishing plantings and habitat, perhaps for threatened fauna? The partial rehabilitation will be undone and full rehabilitation delayed by five years (MR p8). This is unsatisfactory.

The area is a backfilled tailings dam - was the material used suitable for construction? There is no information to assess this matter. Presumably it was back-filled to facilitate rehabilitation, not an accommodation camp.

Has the substrate been tested for pollutant chemicals, or compaction, or composition?

Engagement: The MR (p12) lists the organisations that were consulted during the preparation of the Report. The Wollar Progress Association is not listed - neither is any other community group. This appears to be another example of the proponent's lack of community care. The most impacted stakeholders, being the local community, were not engaged and given the opportunity to comment, contribute, and inform the project.

This is not acceptable.

Provision of services: These significant aspects of accommodation for 100 people are given scant attention, and lack detail. For example:

- The report does not state the expected demand for potable water.
- The report does not state how the potable water will be obtained.
- The report does not state the number of toilets and showers to be provided.
- The report states a 'package sewage treatment plant and associated on-site effluent irrigation area' (MR p8) will be used. There is no assessment of the impacts of this disposal. This information is critical considering the plan to completely rehabilitate the site, after the workers camp has been decommissioned.
- The report does not state how construction waste will be managed.

- The report does not state how food waste and other domestic waste from 100 people will be managed.

Bushfire: The Bushfire Assessment Report (BFAR) details the vehicles to be used for firefighting at the project site, in lieu of a static water supply. These vehicles are 'currently in ownership of the mine and shall be stored on the site' (BFAR p19). There is no indication of this storage footprint on the site plan. Neither is there an indication of the required turning space for these vehicles.

Personnel must undergo training to use the vehicles and the equipment appropriately and safely. There is no information about how the proponent will assure that a vehicle and a trained operator will always be on site.

'A dedicated evacuation point is recommended to ensure the internal road is kept clear at all times' (BFAR p20). This recommendation does not appear to have been implemented.

The Wollar locality is at the centre of much activity associated with renewable energy and the Central West Orana Renewable Energy Zone. The Wollar Solar Farm, the Goulburn River Solar Farm and the Wollar substation (with its associated additional transmission lines) are all nearby, and all require workers who need accommodation. Peabody could redress some of its coal mining contribution to the climate emergency, by re-establishing the housing stock in the district to accommodate workers in the renewable energy workforce. There is potential for Peabody to contribute in a meaningful and positive way to the future of the district

Thank you for the opportunity to comment.

Sincerely,



Rosemary Hadaway

Chair

Mudgee District Environment Group

14th December 2023