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4/8/25

People for the Plains Submission to Maules Creek Continuation Project

People for the Plains has been following the social and environmental impacts of the Maules Creek coal mine for more than 10 years, supporting our members who live in close proximity to the mine. We object to this mine expansion.

Approvals Banking

People for the Plains is opposed to the tactic currently being used by a number of new mine approvals whereby the approval period does not even begin for another decade. This is a disgraceful loophole that the Department has created for maximum benefit for companies who know that these projects will not be approved in another ten years time.

Swift Parrots

The Swift Parrot is a critically endangered species that will experience the loss of a further ~19,000 large White Box trees should this expansion go ahead. We know that swift parrots come to the Leard to feast on the flowering eucalypts in winter. There have been direct sightings and recordings of swift parrots in Leards State Forest four times over the last 12 years. We know it is an important overwintering spot due to the high density of Box trees - four times greater density than the benchmark for swifties.

The EIS provides no satisfactory management for this impact, providing no maps of feeding areas or seasonal habitat use nor does the Biodiversity Development Assessment Report (BDAR) in Appendix C assess in sufficient detail the extent of habitat clearing and fragmentation that will occur to Swift parrots feeding trees.

No Suitable Offsets

Through our involvement with other local groups, we understand that Whitehaven has continued to fail to secure suitable offset lands with mature eucalypt stands that are needed to support Swift Parrots. The BDAR does not provide a timeline or milestones for delivering suitable offset habitat.

Ultimately, even if Whitehaven could obtain offsets, this strategy is a completely unacceptable way to deal with the clearing of habitat for critically endangered species such as the Swift Parrot.

Clearing of Leards Forest

Leards Forest is one of the last intact remnant white box woodlands left in inland NSW. This proposed expansion will take the clearing of Leards State Forest to a massive 46% of the total area.



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The approved and proposed vegetation clearance for Maules Creek, Boggabri, Tarrawonga, Narrabri Underground and Vickery coal mines in the Namoi Valley totals 4,767.2ha with the Continuation Project adding another 642ha of clearing.

A total of 3,036ha of the 7,498ha (over 40%) of Leard State Forest has already been cleared with another 442 ha to be cleared as part of the Continuation proposed project. These mines have effectively severed the state forest into two parts leaving only a 500m wide 3.75km long wildlife corridor that will not provide structural or functional connectivity.

Climate Impacts

The new mine proposed to start in ten years time will create emissions that will exacerbate global warming and intensify the devastating impacts that this causes. It will produce an extra 238 million tonnes of GHG pollution including 3 million tonnes of direct emissions. This, at a time when we are moving towards less emissions, not more, remembering that this project doesn't even begin for another ten years. It is premature to make a decision on this mine now, it should be rejected and reconsidered in 2033 when it is closer to its current approval end date.

Groundwater

People for the Plains have held a long interest in the water impacts from the BTM and are highly concerned with the water impacts proposed for the CP, in particular we believe the pipelines must not be approved.

Our past work identified a sleight of hand by Whitehaven in the Tarrawonga Mod 7 application which was corroborated by the [independent peer review commissioned](#) for NSW DPIE by HydroGeoLogic Pty Ltd Hugh Middlemiss (see pg 11). It showed that Whitehaven mapped the edge of the alluvium of Zone 4 to be different to where the NSW Government mapped the edge. Whitehaven moved this out further to allow for an increase in the edge of the mine pit (over the line that was previously the edge of the aquifer according to the government). At the same time Whitehaven advocated for the removal of the original consent condition that required an impermeable barrier to prevent water entering the pit from the aquifer. Together these actions place a huge risk to the Zone 4 aquifer being penetrated and entering the pit. Adding this opaque network of pipelines will allow this water to be moved around and used wherever the company wants, without suitable scrutiny.

When Maules Creek mine was seeking approval, representatives often stated that this mine was a “surface water” mine and only relied on its high security licence from the Namoi River (WAL 13050), with approval for extraction of up to 3,000 ML per year for all its water needs. Statements used in the original EA included “Net water demands for operation of the mine can be met through utilisation of the existing high security water licence held and as such no further water source is required” (pg 150).

This was reinforced by the condition of consent that required the mine to hold all the water licences it needs and should it not have enough water that it should change its operations to meet its water availability.



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The overall impression given in the original EA was that groundwater impacts would be minimal and largely incidental to mining. At the time, the groundwater model underestimated the scale of in-pit inflows, drawdown levels, and the levels of interconnectivity with alluvial aquifers that have now been proven.

In contrast, the Continuation Project (CP) admits to far more significant impacts to both alluvial and porous rock groundwater systems compared to the original proposed reliance on surface water only. Now, Whitehaven holds multiple water access licences across seven different alluvial and groundwater zones. It has acquired significant groundwater entitlements by purchasing high quality farming land such as “Roma”, “Brighton” and “Olivedene”, just for their water.

- Zone 4 and 5 - the original EA had no water licences for these zones, now Maules Creek Coal owns more than 300ML of water licences from these productive agricultural aquifers
- Zone 11 - Maules Creek mine now owns the majority of the licences in the zone, having had only 78ML in the original EA and now have over 700ML
- Gunnedah Oxley Basin aquifer - originally holding 306ML of licences, now holding over 1,100ML of licences

In total they have gone from 3,078ML to from two sources to 5,416ML from 7 different sources of water, since the original approval Whitehaven Maules Creek has increased its water demand and water licences by a further 56%, increasing licences across five new different water sources.

They also now propose a pipeline to transfer water between sites, obscuring where water is really coming from or going to.

Serial Water Offender

Since the original approval Whitehaven Maules Creek mine has had a series of offences in regards to water. Between 2016 - 2019, they admitted to unlawfully taking approximately 1,000 megalitres of water from the Lower Namoi Regulated Water Source without a licence. The Land & Environment Court fined the company \$200,000 after a guilty plea and discount for contrition. Hydrologists reported that the take reduced flows in Back Creek and limited groundwater recharge during a severe drought.

In February 2020, Maules Creek was fined a paltry \$15,000 for failing to seek consent for construction of two water pipelines built illegally during the drought.

In June 2023 Whitehaven pleaded guilty to polluting water near Maules Creek Mine in 2022 and were fined \$150,000 by the Land & Environment Court.

These ongoing breaches highlight a troubling pattern. Whitehaven has misused and polluted both surface and groundwater at Maules Creek. Their behaviour involved false or misleading claims about compliance, inadequate environmental safeguards, and repeated offences, even during drought conditions.



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The original monitoring bore network established in 2010 was largely destroyed by mining. While some replacement bores were installed in 2013-2014 and again in 2023-2024, many bores have been lost to pit progression. Critically, bores intended to measure impacts on sensitive areas such as Back Creek, Maules Creek, and Elfin Crossing are either absent or insufficient, creating large data gaps and undermining model calibration.

There is a lack of monitoring bores measuring the location and connectivity between the coal seams and the Maules Creek alluvium.

The scale of the changes over time shows a clear case of “approval creep.” What began as a project claiming modest surface water use and limited groundwater interaction has ballooned into a high-water-use mine reliant on groundwater from multiple sources, with growing predicted impacts to aquifers, creeks, and groundwater-dependent ecosystems. The removal of monitoring bores and the opaque nature of the water-sharing arrangements between mines further erode accountability.

The Maules Creek Coal Mine dramatically underrepresented its water needs and groundwater impacts to gain initial approval. The current continuation project now reveals much higher water use from sensitive groundwater sources, widespread aquifer drawdown, and degraded or lost monitoring infrastructure. This shift not only undermines public trust but also highlights the failure of the original environmental assessment and conditions of approval to safeguard water resources.

Assumptions Not Substantiated

Appendix A of the EIS is the Groundwater Impact Assessment (GIA) has several serious weaknesses. The GIA assumes that the Namoi alluvial aquifer (used by farmers and ecosystems) is hydrologically separate from the coal seams being mined. But this assumption is not backed by field data - no testing was done to confirm how water actually moves between layers. Virtually every original water monitoring bore from pre-mining has now been removed.

The groundwater model uses static recharge rates, meaning it doesn't account for increasing droughts or rainfall variability expected under climate change. This makes the model unreliable for predicting long-term water stress and violates NSW planning requirements for climate resilience.

Fault lines run through the mining area and could act as fast pathways for water loss, or as barriers. But the model doesn't include real-world data on how these faults behave. This leaves big gaps in understanding how mining will affect surrounding groundwater systems.

The GIA says impacts on baseflows and drawdown are “negligible” but doesn't assess how these changes might harm groundwater-dependent ecosystems (GDEs) or Indigenous cultural values. In fact, the report confirms that Traditional Owners were not consulted about groundwater.

Peer Reviewer Marking His Own Homework



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Appendix G of the GIA includes a peer review of the model. However the peer reviewers are not independent and one of them helped design the original model and has a long history working for Whitehaven Coal - they are once again, marking their own homework. This is a clear conflict of interest that undermines trust in the review process.

The peer review follows a procedural checklist to confirm whether the model matches NSW government guidelines - but it does not question key assumptions, limitations, or risks. It fails to act as an arms-length scientific review and provides the community with no confidence. In particular, the Peer Review accepts the model without checking how water moves between the alluvial aquifer (used by farms and ecosystems) and the deeper coal seams.

There is no consideration of climate change - even though the region faces increasing drought and recharge variability. The model does not test what happens in extreme dry years, or when multiple nearby mines operate at once.

Social Impacts

The Social Impact Assessment (SIA) in Appendix E outlines the expected impacts and mitigation for the Continuation Project (CP). It is important that this is considered in light of the project as a whole, including the commitments from the original approval. We are now also able to compare mining SIMPs with the expectations for social impacts for renewable energy projects.

The original Maules Creek EA (2011) included a range of Statement of Commitments that included providing apprenticeships and scholarships, contributing funds to emergency services and health facilities and emphasising local hires and encouraging local relocations.

However, the CP SIA (2025) does not clearly show if these commitments have been consistently met or not. It simply converts these into vague continuations with no clear tracking or public and transparent reporting.

The original approval application provided vast promises of increased employment, population growth, increased school enrolments and a better standard of living for locals. A comparison of the original approval SIA and the current application SIA shows:

- Rather than the proposed increased population in Narrabri of 256; there has been a decline in population of 1,646. Maules Creek community itself has seen an annual population decline of a staggering 8.1% since the mine began, leaving the community desolate.
- Rather than the original predictions that local primary school enrolments would increase by 95, with Fairfax School in Maules Creek increasing by about 5 students, we have seen enrolments plummet from 12 down to 2 students since the mine began.
- Despite original claims of large wages that would create economic benefit locally, we find that Boggabri, Maules Creek, Narrabri and Gunnedah all have median incomes lower than the NSW average.
- Despite the promises for aboriginal employment schemes, our local indigenous unemployment rates are higher than the state average.



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- In Narrabri we have more people living in community house and more homelessness than the state average.
- Boggabri, Majules Creek, Narrabri and Gunnedah residents report more long term health conditions than the state average.
- Boggabri now has about 13% of the population as visitors, compared with the state average of 3%, showing there continues to be a heavy reliance on DIDO staff.
- The original application expected “significant increases in demand for flights into and out of Narrabri airport” for FIFO staff. This led to a financial commitment to upgrade the Narrabri Airport. However now, there are no commercial services available due to a lack of demand.
- In comparing the original promises and the CP SIA, it seems the only part that has met expectations is the delivery of around \$1.6 - \$1.9B (although these are not transparent) in royalties to the state government.

Despite the original EA acknowledging the importance of Aboriginal engagement, an Aboriginal representative has *never* been elected to the Maules Creek Community Consultative Committee (CCC). This is a major gap in representative consultation.

The 2025 SIA claims to have engaged with Aboriginal stakeholders and to have held 2 CCC meetings, yet does not disclose who was present or the topics discussed in meaningful detail. The lack of Aboriginal decision-making power over a project impacting their Country is in stark contrast to best practice and the principles of free, prior and informed consent.

The SIA falls short of the NSW Social Impact Assessment Guideline, which requires adaptive management, stakeholder engagement in SIMP design, and clearly measurable mitigation outcomes.

Maules Creek SIA also lacked robust social data compared to [Narrabri Underground Stage Three Expansion SIA](#) which included detailed surveys that openly documented dissatisfaction and identified the operator as poor neighbours. Only 6 neighbouring landholders were engaged in the development of the SIA and there appears to be no co-design elements to the mitigation and management measures.

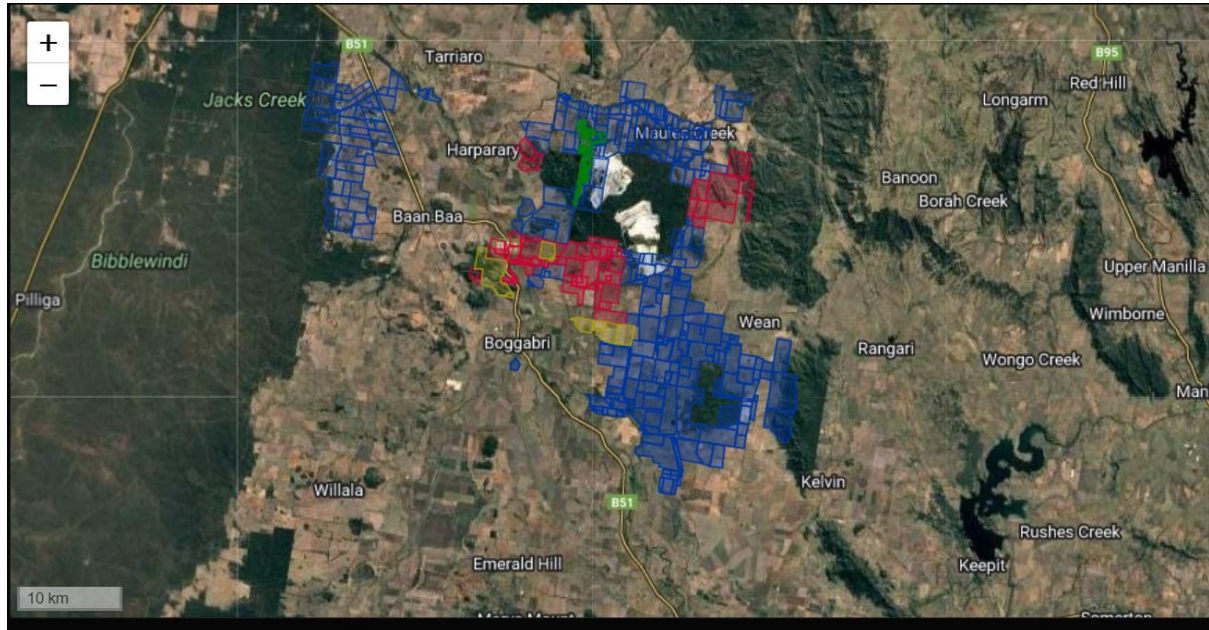
Overall, the CP project creates more negative social impacts than positive and should be rejected on this basis.

Land Area Ownership

The original approval was granted on the understanding that the project would coexist with local agriculture and retain the integrity of the Maules Creek community. Instead, more than 70 farms have been bought out, families displaced, and the school emptied. The continuation project entrenches this industrialisation and fails to deliver transparency, accountability, or community repair.

The SIA's failure to recognise the scale of social transformation and its reliance on outdated assumptions of “no change” undermines its credibility and disrespects our community.

The satellite image below shows that Whitehaven now controls an estimated >75,000 hectares of land in the Maules Creek-Boggabri area. This includes mining leases, farms used for water, biodiversity offset zones and extensive buffer properties. The scale of land control is industrial and unprecedented. What began as a small project reliant on Crown forest now sprawls across private farmland and entire catchments, all with minimal scrutiny or transparency.

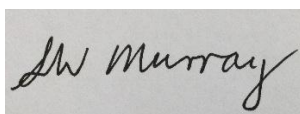


Conclusion

This application should be rejected, maintaining the existing approval til 2034, and ensure strict oversight of compliance of the conditions of consent by the proponent. At the same time our region should be properly resourced to:

- Create catchment wide planning that understands the vast changes to water systems that have occurred in the last ten years and work towards recharging the landscape with sustainable water flows
- Assess a range of options for employment and industry development in the region
- Better understand and document the skills gaps and training needs and human resources available locally to service new industries post-mining
- Be in a position to enact these plans immediately should the market determine an immediate shut down of the company

Kind regards



Stuart Murray, President, People for the Plains