



18 August 2025

Illawarra Branch

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NSW Department of Planning, Housing and Infrastructure
Via Planning portal

OBJECTION TO MP08_0149-MOD-4 METROPOLITAN COAL MINE MODIFICATION 4 RECONFIGURATION OF LONGWALL 317 AND ADDITION OF NEW LONGWALL 318

The National Parks Association of NSW (NPA) Illawarra branch appreciates the opportunity to comment on this expansion proposal by Peabody Energy. We object to this proposal because if approved it will:

1. produce emissions in excess of NSW targets
2. damage ecosystems
3. compromise our drinking water
4. risk a further upland swamp
5. produce limited economic and social benefit

Furthermore we object to the process of vesting this decision in the Minister for Planning rather than subjecting it to independent assessment.

NPA's mission is protecting, conserving and restoring the integrity and diversity of nature. Our strengths include deep local knowledge through our Statewide network of regional and specialist groups, evidence-based input to policy and planning, and a respected track record since 1957. We also provide outstanding opportunities to experience and learn about nature through our unrivalled community program of bushwalking, field surveys, bushcare and other nature-based activities. We have made many submissions on mining matters in the past.

Elaboration of our objections:

1. Emissions in excess of targets

We are deeply concerned about the need to work to rapidly reduce greenhouse gas emissions and endorse the call to stop new coal and gas projects and facilitate the transition to renewable energy. We note that the Minns Labor government has already approved six mine extensions in NSW. These approvals cannot continue if the government is serious about its 2030 and 2035 emissions reduction targets. Coal mines in the Illawarra tend to be particularly gassy and methane-rich, and produce among the highest level of emissions in the state. Furthermore these emissions may continue well beyond the life of the mine, as is occurring at Northcliff shaft vent in the Dharawal National Park.

2. Damage to ecosystems

As we are a conservation organisation we are particularly concerned about the damage coal mining has done in the Illawarra to our fragile ecosystems. Australia is already in a crisis of biodiversity and species extinction due to the destruction of habitats from human activities such as land clearing, logging and mining. Most worrying in the case of this proposal is the potential for damage to our natural water systems.

Metropolitan mine is adjacent to the Royal National Park, a much loved and highly valued asset for residents of Sydney and the Illawarra. Unfortunately the headwaters of the Hacking River are not included in the park, but constitute the site of many activities which threaten the river and hence the park that it flows through. Mining is a highly threatening process and Metropolitan has a particularly poor record in regard to environmental safety. NPA objected strenuously to the pollutants from coal waste being released into Camp Gully and the Hacking River in 2022 and 2023. We are concerned that no effective emergency management procedures were put in place and that such spillages could happen again.

3. Effects on our drinking water catchment

The health of Sydney's water catchment has been a major theme in objections to mining in our area and we strenuously object to any mining being allowed under the catchment. Many mining activities in our region take place under the Special Areas of the Greater Sydney Drinking Water Catchment, areas so designated to protect the water catchment and supply. But Metropolitan Mine operates within the Woronora Special Area and proposes to extend further into it, thus further undermining its special value. We note that the present proposal involves new longwalls in close proximity to Honeysuckle Creek and the Woronora Reservoir.

As residents and bushwalkers we are conscious of the need to avoid these areas and the steep fines involved for trespassing. It has always struck us as absurd that mining can even be contemplated in such restricted zones. The highly publicised cracking and subsequent grouting of the creekbed of the Waratah Rivulet some twenty years ago continues to cause scepticism about the company's capacity to rehabilitate any damage to watercourses caused by subsidence.

4. Further damage to upland swamps

NPA and many other organisations have objected to the undermining of Coastal Upland Swamps in the Sydney Basin Bioregion, an Endangered Ecological community under NSW legislation. We note that the present proposal includes a new longwall built directly under Upland Swamp 106. Damage is done to these swamps through fracturing the rocks below and allowing water to flow through rather than sitting on or near the surface as a sponge. In dry weather the swamps then dry out and wetland species of plants and animals die. Peat contained in the swamps can release methane. From being fire barriers they add to fire risk. In addition the water previously held by the swamp percolates through the fissures and becomes polluted with heavy metals before getting to mine voids or out into the wider environment. The drying out of swamps and effects on water flows above the Dendrobium mine has caused much consternation among scientific experts.

5. Limited economic and social value

This proposal underlines the dubious value of the Metropolitan Mine to the local and Australian economy and to our social cohesion. While some of the coal produced is supplied to BlueScope Steel, about half of it is exported. Peabody Energy as an American company that pays royalties but has not paid any company tax for many years.

We also note some of the most bitter divisions in our country between Indigenous and non-Indigenous Australians have been over damage to sacred sites from mining. Many Aboriginal sites are listed in the vicinity of Metropolitan, so we question whether there has been sufficient consultation over their protection.

6. Need for independent assessment

We do not understand why this proposal has not been referred to the Independent Planning Commission (IPC) for wider consultation. Resources Minister Courtney Houssos and other Labor politicians have stated that the government supports an independent assessment process for resource projects, including environmental assessment and community input. We submit that the present proposal should be so treated, and not be the sole responsibility of Minister for Planning Paul Scully. There are wider issues at stake beyond his planning portfolio.

For many reasons then NPA Illawarra Branch is firmly opposed to this expansion. Developments in climate and energy policy combined with the increased urgency to protect our diminishing natural heritage should caution against recklessly pursuing the mining of coal in this highly valued and fragile natural environment and essential water catchment.

I can be contacted at helenw@npansw.org.au

Yours sincerely,

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National Parks Association of NSW
protecting nature through community action