



Oatley Flora & Fauna Conservation Society Inc.
Protecting the local environment since 1955

Celebrating our 70th Year!

26/08/2025

Submission to NSW DPHI

Peabody Energy expansion of Metropolitan Mine operations

Modification 4 Longwall 317 and 318 Modification

Oatley Flora and Fauna Conservation Society (OFF), established in 1955, is one of the oldest environmental advocacy groups in southern Sydney. We are dedicated to the preservation and restoration of the natural environment within the Georges River catchment, with a focus on biodiversity conservation, ecological health, and community education.

The Metropolitan Coal Mine operates under the legislated Woronora Special Area of the Greater Sydney Drinking Water Catchment (GSDWC). Special areas are areas recognised as having very high water, water infrastructure and ecological values, and are 'protected' under the law. Hefty fines apply to members of the general public who enter without appropriate permission. This modification proposes to expand further into, and further undermine the Woronora Special Area.

Australia, specifically the Sydney metropolitan area, is widely cited as the only country to allow longwall mining under publicly owned drinking water catchments. This practice, particularly longwall coal mining, is not conducted in any other major city's drinking water catchments worldwide due to the significant risk of irreparable damage to water quantity and quality. Why is this allowed to happen?

OFF objects to this Modification proposal on the following grounds:

- **Climate change impacts** from both projected and unaccounted-for greenhouse gas (GHG) emissions: -
 - This Modification will lead to yet more projected GHG emissions – Scopes 1, 2 and 3 as outlined in the proposal. Given experience to date of coal mining in Australia, these projected emissions will significantly underestimate the Scope 1 fugitive methane emissions during the life of the mine and during decommissioning.
 - This Modification will lead to GHG emissions that are not accounted for in the proposal. Methane-rich GHG emissions will likely continue for decades, if not centuries, well beyond the mining and decommissioning period – directly from the disrupted landscape and via nonsealable infrastructure such as adits and shaft vents. Even if the company follows through with their stated decommissioning and removes the shaft-vent above-ground structures in a timely way and plugs the shaft with reject, there is still no way to reseal the landscape. The use of polyurethane/grout or other materials attempting to repair and plug cracks and repair rock platforms, simply does not work. High-pressure coal seam gases escaping from deep underground will find their way out through other weak spots or openings in the mining disrupted landscape.
 - The Bulli Coal Seam which Metropolitan mines is notoriously gassy. Metropolitan is NSW's fifth highest emitting coal mine with a very poor track record of GHG abatement. Its Scope 1 emissions in FY24 were at their highest level since the Safeguard Mechanism was introduced in 2016 (at almost 700,000 t CO₂-e). Furthermore 80% of Scope 1 in FY24 was methane (554,603 t CO₂-e).
 - According to the NSW Net Zero Emissions Dashboard, NSW is not on track to meet its 2030 GHG emissions reduction target. Since April 2025, NSW DPHI has approved new coal projects that will very likely be responsible

for ~24% of the projected 2030 overshoot. NSW is in an even worse position related to its 2035 target. Approving this Modification will only make meeting NSW emissions targets more difficult. Moreover, experts (e.g. Climate Council, CSIRO, Ember etc) argue that during the next decade the world needs to urgently cut fossil fuel methane emissions – due to the methane’s high warming potency and short lifespan in the atmosphere – while we find ways to reduce carbon dioxide emissions. However, keeping our world within 1.5°C warming now seems already out of reach.

- **Further negative impacts on the quantity and quality of water in the GSDWC:** this is inconsistent with the neutral or beneficial requirement in the EP&A Act. Metropolitan has already caused very significant damages in the Woronora Special Area (e.g. as discussed in the Independent Expert Panel on Mining in the Catchment reports) – much more than was predicted at the proposal stages, with impacts on water quantity and quality. An extensive literature demonstrates that longwall coal mining busts up the geological strata as evidenced by subsidence, hogging, tilting, fractures, cracks and the like – and this damages the landscape with impacts on water flows and water quality.

Moreover, Peabody has released polluted waste material into a waterway which flows through the Royal National Park on numerous occasions through 2022, in January, July, August, September, October, November, and December. In January 2023 the NSW Environment Protection Authority (EPA) reported yet another spill of “grey, turbid water with possible coal material present.” In March 2023 the NSW EPA reviewed the mine’s license to pollute and tightened some conditions, but this has failed to prevent further damage to the park. In August 2023, the embankment of the mine site next to the adjacent creek collapsed, coal waste material again spilled into the creek, and from there into the Hacking River, which flows through the heart and length of the Royal National Park. Throughout these incidents no effective emergency management procedures were put in place to stop the coal waste polluting the Hacking River and Royal National Park.

- **Potential destruction of Aboriginal cultural heritage** through damages to sites and to the cultural landscape – occurring across an estimated study area of 455 hectares. The proposal indicates that a total of 29 cultural heritage sites were identified in a survey of just 9% of the area. Consulted Aboriginal parties argue that cultural heritage sites should be considered holistically and all have high cultural significance even though the Niche assessment did not identify any as having high scientific significance. The report notes potential fracturing of exposed sandstone at grinding groove sites and potential for rockfalls at overhang sites. 25 of the 29 confirmed Aboriginal heritage sites located in the Modification area could experience subsidence-driven ground movement, potentially leading to loss of cultural value.

- **Damage or destruction of fragile ecosystems**, including specifically to the upland swamp 106.

- **Impacts on biodiversity and species** that result from:

- Geological impacts and altered hydrogeology caused by ground subsidence and fracturing from underground longwall mining; and

- Direct land, ecosystem and water disturbances associated with surface infrastructure such as shaft vents and sealing of roads and heavy vehicle movements – extending beyond the current impacted Mining Lease zone. Australia is already in a biodiversity and species extinction crisis.

- **This proposed Modification is not consistent with ecologically sustainable development:**

The Wollongong LEP prohibits development for the purpose of underground mining within the C2 (Environmental Conservation) zoning, which is where this Modification would occur.

Notably, the objectives of C2 zones in the LEP are:

- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.

- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.

- To retain and enhance the visual and scenic qualities of the Illawarra Escarpment.
- To maintain the quality of the water supply for Sydney and the Illawarra by protecting land forming part of the Sydney Drinking Water Catchment under State Environmental Planning Policy (Biodiversity and Conservation) 2021, Chapter 6, to enable the management and appropriate use of the land by Water NSW.

Conclusion

Given the foregoing detrimental impacts which will occur if this proposal is approved, coupled with Peabody's very poor track record of pollution incidents emanating from their mine, flowing to the Hacking River and through the Royal National Park and their inadequate emergency management procedures, OFF is firmly of the view that the risks are far too great, should not be accepted and the proposal should be rejected.

Yours faithfully,



Kim Wagstaff
President