

Submission Objecting to Metropolitan Mine Modification 4

To whom it may concern,

I am writing to express my strong objection to Metropolitan Mine Modification 4 Longwall 317 and 318 Modification.

As a concerned Wollongong resident, I believe this proposal presents serious and unacceptable risks to our environment, water security, and climate, and should be rejected. I have seen first-hand some of the impacts of Metropolitan mine's operations in the Woronora Special Areas. It is unacceptable to allow this damage to the Special Areas to continue.

These are photographs that I have taken on WaterNSW accompanied visits to areas of Waratah Rivulet and Eastern Tributary that had been undermined by Metropolitan Mine.

Eastern Tributary, July 2019

On 23 July 2019, I visited three separate areas of the Eastern Tributary of Waratah Rivulet, accompanied by WaterNSW. This visit was reported in the Sydney Morning Herald on 27 July 2019.¹

Area 1:

- Streambed cracking was observed (Figures 1, 2), along with minor water staining from mineral contamination.

Figure 1:



¹ <https://www.smh.com.au/environment/sustainability/shocking-mining-damage-in-sydney-s-catchment-prompts-calls-for-halt-20190726-p52azm.html>

Figure 2:



Area 2:

- No cracks were visible; WaterNSW staff noted any cracking was likely underwater or hadn't extended to the surface.
- The water showed a bright orange stain (figures 3, 4) with floating, bubbling orange scum.

Figure 3:



Figure 4:



Area 3:

- The creek dried up as water went underground (Figure 5), revealing dramatic scarlet staining (Figure 6). No birds or frogs were heard, in contrast to upstream areas.

Figure 5:



Figure 6:



Waratah Rivulet, February 2016

On 19 February 2016 I visited Waratah Rivulet accompanied by WaterNSW and former Minister for Planning Rob Stokes. The Minister asked us to keep the visit confidential. What a shame our elected representatives don't want to speak openly about this important issue of public concern!

The creekbed was totally smashed up. The rock was fractured and shattered. (Figures 7 and 8)

Figure 7



Figure 8



An attempt had been made to “repair” the damaged creekbed with some kind of polymer. (Figures 9 and 10) This material had swollen and deteriorated. It’s unbelievable that this occurred in the “protected” Special Areas.

Figure 9



Figure 10



Aside from my own experience of witnessing the damage that longwall mining is doing to the Woronora Reservoir's catchment, the following are also reasons for my objection to this proposal.

1. Risk to Drinking Water and Public Health

The proposed extension continues mining inside the **Special Areas of the Woronora Catchment**, a key water source for more than five million people across Sydney and the Illawarra. Subsidence caused by longwall mining threatens upland swamps and natural watercourses that play a vital role in water filtration and drought resilience. Swamps like **Swamp S106** are particularly at risk.

The proximity of the mine's longwall panels to **Woronora Reservoir** endangers the integrity of a critical piece of public water infrastructure. This is unacceptable. It's worth noting that **Sydney is the only city in the world that permits longwall mining in a publicly owned drinking water catchment**, a fact highlighted by the NSW Chief Scientist in 2014.² This kind of risk would not be tolerated elsewhere — and it shouldn't be tolerated here.

The Independent Expert Advisory Panel for Mining has expressed concerns that **the assessments of water quality in the Woronora Reservoir are not based on sufficient data or analysis**. As a result, the conclusions drawn from those assessments lack justification and cannot be considered reliable. Further, the report highlights that the monitoring program does not effectively measure or attribute impacts from the Metropolitan Coal Mine to the reservoir and there are significant limitations in the scope, frequency, and scientific robustness of the water quality data being collected.³

2. Irreplaceable Environmental and Biodiversity Impacts

The area affected by this proposal includes fragile ecosystems that are home to several threatened species. Longwall mining in this landscape will cause subsidence, habitat destruction, and pollution, placing further pressure on wildlife already at risk. Species such as the **Swift Parrot, Bynoe's Wattle, Prickly Bush-pea, Pilotbird, Thick-leaf Star-hair, White-throated Needletail, and Woronora Beard-heath** depend on this habitat to survive.

With biodiversity already declining across NSW, approving further disturbance in such a sensitive area would be irresponsible and inconsistent with the government's environmental obligations.

3. Climate Impact and Emissions

The Metropolitan Mine is one of the **highest emitters of Scope 1 emissions** of any coal mine in NSW. In 2024 alone:

² "On measuring the cumulative impacts of activities which impact ground and surface water in the Sydney Water Catchment", NSW Chief Scientist & Engineer, May 2014, P A-27, Accessed 6.4.21 at:

http://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0007/44485/140530_SCA-Report-Final-Combined.pdf

³ INDEPENDENT EXPERT ADVISORY PANEL FOR MINING, ADVICE RE: Water Quality Performance Measures for Metropolitan Coal Mine September 2023 Report No: IEAPM 202309-1

Accessed 25.8.25 at https://www.planning.nsw.gov.au/sites/default/files/2025-06/ieapm-water-quality-performance-measures-metropolitan-coal-mine-202309.pdf?utm_source=chatgpt.com

- Scope 1 emissions were nearly **700,000 tonnes CO₂-equivalent**
- Over **80% of these emissions were methane**, a highly potent greenhouse gas
- The mine was ranked **fifth highest in emissions** under the federal Safeguard Mechanism

While the mine produces metallurgical coal, this does not cancel out the significant climate impacts. Approving an extension with such a high emissions profile goes directly against NSW's climate commitments. The **NSW Net Zero Commission** has made it clear that **the state is not on track to meet its 2030 emissions reduction targets**, writing in its 2024 Annual Report:

*"...there is a risk of increased emissions associated with a sizeable pipeline of coal mine extension and expansion projects that are currently awaiting determination through the planning process. Any emissions increases associated with extended or expanded coal projects would require other sectors to make greater emissions reductions if the state is to meet its emissions reduction targets. The potential emissions increases from projects seeking planning determination pose a major challenge for the state's regulatory arrangements."*⁴

Continuing operations like this will only make the situation worse.

4. Questionable Public Benefit

The proponent, **Peabody Energy**, is a multinational company that pays **no corporate tax in Australia**, despite making large profits from its operations here. While jobs are important, they must not come at the cost of long-term environmental harm or public health. Sustainable, long-term employment should be prioritised over short-term profit for overseas corporations with poor environmental track records.

5. Part of the proposed project area is outside the area of Metropolitan's mining lease

Why are we even being asked to consider more longwalls in an area where Metropolitan doesn't yet have a mining lease?

6. Outdated Planning Process and the Need for Proper Review

This proposal is being pursued under an outdated approval from 2009 — a time when our understanding of climate risks, water security, and biodiversity loss was far less advanced. Using a modification process to continue mining avoids proper scrutiny and undermines public confidence in the planning system.

I urge the Department to reject this proposal outright. If it is not rejected, at the very least it must:

- Require a **full Environmental Impact Statement (EIS)**
- Assess the proposal under **current legislation and scientific standards**

⁴ NSW Net Zero Commission Annual Report 2024, p. 43, accessed 25.8.25 at https://www.netzerocommission.nsw.gov.au/sites/default/files/2024-12/NZC%202024%20Annual%20Report_V11.pdf

- Refer the matter to the **Independent Planning Commission (IPC)** for independent review and a public meeting, with merit appeal rights maintained

This is what transparency and good governance demand.

Conclusion

In summary, Metropolitan Mine Modification 4 puts our water supply, biodiversity, climate targets, and planning integrity at risk. There is evidence of irreparable damage to the Woronora Special Areas caused by Metropolitan's underground coal mining. I strongly urge the Department of Planning and Environment to **reject this modification** in the interests of the public and future generations.