



Submission Objecting to Metropolitan Mine Modification 4

From: Protect Our Water Alliance (POWA)

Subject: Objection to Modification 4 – Longwalls 317 and 318, Metropolitan Colliery

Date: 25 August 2025

Protect Our Water Alliance (POWA) strongly opposes the proposed Modification 4 to extend Longwalls 317 and 318 at the Metropolitan Colliery. We urge the Department of Planning, Housing and Infrastructure to reject this application.

POWA is a Wollongong- based, grassroots organisation committed to protecting Greater Sydney Water Catchment from the damage and degradation that is being caused by mining.

We maintain that the Special Areas should not only be off limits to the public, but also protected to the centre of the earth from extractive industries.

1. Environmental and Biodiversity Impacts

The area affected by this proposal includes unique and sensitive ecosystems that support a range of threatened species. Subsidence and pollution from longwall mining will degrade critical habitat and push already vulnerable species – such as: Swift Parrot; Bynoe's Wattle; Prickly Bush-pea; Pilotbird; Thick-leaf Star-hair; White-throated Needle-tail; and Woronora Beard-heath - closer to extinction. Other endangered species through this area include -

- Giant Dragonfly (*Petalura gigantea*),
- Eastern Ground Parrot (*Pezoporus wallicus wallicus*),
- Giant Burrowing Frog (*Heleioporus australiacus*),
- Littlejohn's Tree Frog (*Litoria littlejohni*),
- Red-crowned Toadlet (*Pseudophryne australis*)

These species and their habitats are already under significant pressure. Approving further disturbance in this fragile landscape would accelerate biodiversity decline and undermine the state's environmental obligations.

2. Threat to Woronora Reservoir Water Catchment and Public Health

The proposed extension involves continued mining within the Special Areas of the Woronora Catchment, a critical water source for over five million people across Sydney and the Illawarra.

Mining-induced subsidence threatens endangered upland swamps and watercourses that play a vital role in water filtration, retention and drought resilience. Swamps such as Swamp S106 are especially at risk. Peabody has estimated that six swamps altogether could be adversely impacted, and proposes that offsets are an acceptable solution for such damage: yet offsets cannot stand in as a suitable solution to permanent, irreversible damage to such a vital public resource.

Honeysuckle Creek is similarly predicted to be subject to cracking, with polyurethane grouting suggested as a remedy. This type of damage is not acceptable.

Another additional 3.8 hectares is proposed to be cleared for an industrial zone deep in the catchment, for a ventilation shaft which was previously approved to be built next to a highway.

The proximity of longwall panels to the Woronora Reservoir places the integrity of a key public water asset in jeopardy. Longwall mining in a protected drinking water catchment is a serious and unacceptable risk to our future water security.

Sydney is the only city in the world to allow longwall mining in a publicly owned drinking water catchment, as noted by the NSW Chief Scientist in 2014:

“It was noted that there are no international examples of longwall mining operating in publicly owned drinking water catchments but there are examples of it occurring under streams and aquifers connected to privately owned wells in the Appalachians of the U.S.A.”¹

3. Threat to Hacking River Catchment and the Royal National Park

Peabody’s environmental record raises questions about the extent to which they can be trusted to protect Australia’s oldest National Park. The company received a criminal conviction for discharges from the mine’s surface facilities at Helensburgh, repeated

¹ 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

discharges which resulted in coal waste spreading through the Hacking River, which runs through the length and heart of the Royal National Park.

The surface facilities at Helensburgh are over 140 years old - this site is too small, narrow and constrained for a working coal mine of this size. The NSW Environmental Protection Authority (EPA) has tightened the company's Environmental Protection License, and has drawn up new pollution reduction programs, but there are still no proper disaster / risk management plans in place to deal with any future spills. The operation in this location remains an ongoing threat.

4. Climate Impact and Emissions Profile

The Metropolitan Mine has one of the highest Scope 1 emissions of any coal operation in New South Wales. In FY2024:

- Total Scope 1 emissions reached nearly 700,000 tonnes CO₂-equivalent
- Over 80% of these emissions were methane, a potent greenhouse gas with significant short-term warming potential
- The mine ranked fifth highest NSW mine in emissions under the Safeguard Mechanism

Although the coal extracted is predominantly metallurgical, its climate impact remains substantial. Approving an extension of operations with this emissions profile directly undermines the state's net zero goals and national climate commitments. The NSW Net Zero Commission has said that NSW is not on track to meet its net zero targets.²

5. Corporate Conduct and Questionable Public Benefit

The proponent, Peabody Energy, is a multinational company that pays no corporate tax in Australia, despite generating substantial profits from its local operations. While employment is important, short-term jobs must not come at the cost of long-term environmental harm. Sustainable employment pathways should be prioritised instead of allowing companies with poor track records to profit at public expense.

6. Outdated Planning Framework and Need for Full Reassessment

This project is proceeding under an original 2009 approval, granted at a time when climate, water security and biodiversity concerns were not understood to the extent

² https://www.netzerocommission.nsw.gov.au/media/2023-24-annual-report-commission-says-net-zero-action-must-be-accelerated?utm_source=chatgpt.com

they are today. The use of the modification process to prolong mining operations avoids proper scrutiny and transparency.

We urge the Department to reject this proposal. However, if it is not rejected outright, given the scale and seriousness of environmental risks, this proposal requires a full Environmental Impact Statement (EIS) and assessment under current legislation and scientific standards. Furthermore, it should be referred to the Independent Planning Commission (IPC) for an independent and transparent review and a public meeting, consistent with NSW Labor government commitments.

Conclusion

Metropolitan Mine Modification 4 represents an unacceptable risk to public water supply, native ecosystems, climate goals, and planning integrity. We urge the Department of Planning and Environment to reject this modification.