



environmentally concerned citizens of orange
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To Whom it May Concern

Re: Wilpinjong Coal Mine Mod 3-Pit 8 Extension

Dear Sir/Madam

I am writing to you on the above issue on behalf of Environmentally Concerned Citizens of Orange. We are an environmental group that has advocated for many years for climate action including the reduction of greenhouse gas emissions caused by fossil fuel burning. We've also campaigned against the clearing of native vegetation and for the preservation of native species. We are now writing to express our concern about the proposal to expand the already environmentally disastrous Wilpinjong Coal Mine. ECCO objects to the proposal for a range of reasons.

Release of Over 25 Megatons of Additional Greenhouse Emissions

It is estimated that if approved, the coal mine extension will result in the production of an additional 25 megatons of greenhouse gases. Our planet cannot afford this extra injection of carbon into its already overburdened atmosphere. This is particularly unacceptable due to the fact that time is running out for us to reach our net zero target.

Competition with the Central West Renewable Energy Zone

Australia has made important commitments to renewable energy transition at both state and national levels. At a state level, this includes the Central West Renewable Energy Zone which starts at Wollar, a town that is very close to the site of the mine extension. If coal mine extensions are approved, it muddies the waters and calls into question the commitment of our governments to taking real action on climate change. Coal mine extensions also slow progress towards renewable energy transition through the diversion of workforce and resources.

Extension Should Not be Assessed as a Modification

The Mod 3 is the first stage of a bigger mine expansion. As such it should not be assessed as a modification. It should be assessed as a new project. It is not the same as the current mine approval for the following reasons:

- It falls outside the current mining lease
- It is part of a larger expansion project
- Encroaches on the Wollar catchment
- Destroys an endangered microbat hotspot
- Causes additional biodiversity impacts under Federal environmental law
- Destroys a new area of Aboriginal cultural heritage significance.

Unacceptable Impact on Local Native Biodiversity

If the project is allowed to proceed the result will be the disturbance of an additional 155 hectares of habitat which will have an unacceptable impact of local populations of the nationally threatened species - Large Eared Pied Bat, Eastern Cave Bat, Regent Honeyeater and Koala. Australia’s native biodiversity is in crisis. We should be doing all we can to preserve and protect our native biodiversity, not contribute to an already disastrous scenario by causing more habitat destruction.

Unacceptable Impacts on Local Water Resources

It’s estimated that the proposed expansion will cause a groundwater drawdown of more than 20 metres and cause a loss of over 20 million litres per year from the Wollar Creek. Assessment and monitoring of both ground and terrestrial water sources have been inadequate, but the estimates available indicate that extraction of water from the system at that level would have a disastrous ecological impact.

Conclusion

Australia has a commitment both nationally and internationally to a net zero future, which can only be achieved through reducing our dependence on fossil fuels. It is illogical and almost incomprehensible that we are still considering coal mining extensions in this context.

Many of our native species are in crisis, as is their habitat. To further destroy native habitat and exacerbate this crisis, especially when we’re committed to strengthening our nature laws, does not make sense.

And of course Australia is the driest continent on Earth after Antarctica. Again It defies logic to commit to a project that will cause the extraction of vast amounts of water that will have a deleterious impact on already stressed resources.

ECCO does not support this project. We urge you to withhold consent on the above grounds.

Yours sincerely

Stephen Nugent
President
ECCO