



Hunter Environment Lobby Inc.

202 High Street
East Maitland 2323
28th October 2025

Wilpinjong Coal Mod 3 – Pit 8 Extension Object

Hunter Environment Lobby (HEL) is a regional community-based environmental organization that has been active for well over thirty years on the issues of environmental degradation, species and habitat loss, the importance of biodiversity and the challenges of climate change

HEL is aware that the background of the Peabody Energy Wilpinjong Coal Mine has been approved to mine 16 MT/year to end of 2033. It is a wholly open cut operation disturbing over 30km² of farmland and high biodiversity values between Goulburn River National Park and Munghorn Gap Nature Reserve.

HEL believes that the proposed mine expansion should not be assessed as a modification because it differs substantially from the current approved mine. Its purpose seems to be facilitate a much larger expansion in the near future that surrounds Wollar village.

We believe that this 'modification' proposal should be assessed as a new project. Wollar community is preparing to rejuvenate and rebuild including a return of Aboriginal people through successful land claims. The Central West Orana Renewable Energy Zone (CWOREZ) starts at Wollar being the first approved REZ in NSW. Wollar is the starting point for the transition to clean energy.

There should be no more expansion of coal mining. HEL also notes that there will be a loss of Aboriginal cultural heritage and spiritual landscape for Wiradjuri Nation, this is not acceptable. We find that this new mining will be destroying more important habitat for the nationally threatened Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater and Koala.

We see also that this proposal will permanently alter and degrade alluvial groundwater sources and surface flows in the Wollar Creek catchment. An increase in pollution will be seen through poorly assessed noise, dust, blasting, onsite coal ignition (spontaneous combustion), lighting and water contamination.

An increase in social impacts will occur in the forms of loss of amenity and ongoing disturbance of rural way of life. This development will also slow the transition to a clean energy future – competing with the Central West Renewable Energy Zone that starts at Wollar.

This project is not needed to provide regional jobs – there is a huge workforce shortage for renewable energy projects in the Central West 10. There is no economic justification, the increased climate change impacts will cost more than public income generated through royalties and taxes.

We will see the impacts on Aboriginal cultural heritage, Wilpinjong Mine area is significant for Aboriginal cultural heritage with over 1,000 sites recorded over many years. There is ample evidence of continuous Wiradjuri occupation of the region with spiritual connection to country. Mod 3 will cause the destruction of an additional 15 sites.

The proposed new area will take open cut mining operations to the boundary of Wollar Village. Pollution from current mining has caused significant health and well-being impacts on the Wollar community forcing many people to sell up to Peabody Energy and leave the district.

The depopulation directly attributed to mining has not been addressed. The Social Impact Management Plan for the current approval identifies that mining and workforce would start ramping down this year 2025. Remaining community members are preparing to rebuild and reinvigorate the community. This proposed new expansion adds to future uncertainty and stress levels further threatening mental health and wellbeing. The Social Impact Assessment identified seven positive social outcomes if the proposal doesn't go ahead and only two negatives.

The proposed extension of mine disturbance will significantly impact two critically endangered ecological communities (CEEC) and eleven endangered fauna species. ts: The new open cut area contains the highest density of the endangered Large-eared Pied Bat and Eastern Cave Bat in the region. Two rocky hills will be removed, which are at the centre of the hotspot. These are critical breeding habitats including known maternity sites, resulting in a Significant and Irreversible Impact (SAII).

The assessment fails to adequately consider indirect impacts from the proposal on the Box Gum Woodland CEEC and understates the extent of impact. This community is identified as groundwater dependent. The potential impacts of the proposed groundwater drawdown are not considered or assessed.

The proposed expansion will directly remove mapped areas of important habitat for the critically endangered Regent Honeyeater. There are current records of breeding activity in the district that are not recognised in the assessment report.

Expansion of open-cut mining forms an extensive and hostile barrier between the locally significant conservation areas of Munghorn Gap Nature Reserve and Goulburn River National Park. Importantly, this proposal will remove the closest points of intact remnant vegetation on the valley floor currently forming stepping stones of habitat between these two reserves for a wide variety of woodland birds including the Critically Endangered Regent Honeyeater and mobile fauna like the Endangered Koala.

Water Impacts Will cause a groundwater drawdown of over 20m and loss of groundwater (base)flows to Wollar Creek of over 21 million litres per year. No monitoring has been done within the area of mine expansion to establish a baseline or measure impacts from current mining operations in Pit 8.

Terrestrial Groundwater Dependent Ecosystems (GDEs) have not been adequately assessed including those within the boundary of Wollar Village that provide significant ecological and aesthetic values. Wilpinjong Mine has a poor history of water

management and modelling by intercepting more water than predicted. Increased salinity loads of up to 3.5 tonnes salt per day in mine discharge are a potential downstream water quality impact.

The proposed extension should not be assessed as a modification because it is not substantially the same as the current mine approval – it falls outside the current mining lease and is part of a larger expansion project.

It seems that the proposal to mine to Wollar Village boundary encroaches on Wollar Creek catchment and destroys an endangered microbat hotspot. This will cause additional biodiversity impacts under Federal environmental law.

The proposal has been assessed to contribute \$21 million of net public benefit. This amount, however, would not cover the costs of current climate change generated extreme weather events. The additional greenhouse gas emissions will cause a greater public cost.

There is no need for extended coal mining in the region to provide local jobs. Mining is competing for skilled labour urgently required in the construction, housing and renewable energy industries. There is a major labour shortage in the Central West with local workers needed for the CWO REZ construction.

The NSW Government has prioritised the Central West Future Jobs and Investment Authority to manage the transition away from coal mining. The Mudgee region has many opportunities to diversify the economy.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is positioned above the typed name and title.

Jan Davis
President Hunter Environment Lobby Inc.