

Objection to Peabody Energy proposal to expand Wilpinjong Coal Mine Mod 3 – Pit 8 Extension

I'm aware that the Peabody Energy Wilpinjong Coal Mine has approval to mine 16 MT/year to the end of 2033, and it is a wholly open cut operation which disturbs over 30km² of farmland and high biodiversity values between Goulburn River National Park and Munghorn Gap Nature Reserve.

However, the proposed mine expansion should not be assessed as a modification because it differs substantially from the current approved mine. Its purpose is to facilitate a much larger expansion in the near future that surrounds Wollar village. This 'modification' proposal should therefore 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, as it is completely at odds with the transition to clean energy.

Below are key points for my **objection** to the proposed expansion of Wilpinjong Coal Mine:

1. Releasing over 25 MT of additional Greenhouse Gas emissions
2. First stage of a bigger mine expansion and should be assessed as a new project
3. Mining to the boundary of Wollar Village
4. Disturbing an additional 155 ha:
 - loss of Aboriginal cultural heritage and spiritual landscape for Wiradjuri Nation
 - destroying more important habitat for the nationally threatened Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater and Koala
5. Permanently altering and degrading alluvial groundwater sources and surface flows in the Wollar Creek catchment.
6. Increasing pollution through poorly assessed noise, dust, blasting, onsite coal ignition (spontaneous combustion), lighting and water contamination
7. Increasing social impacts, loss of amenity and ongoing disturbance of rural way of life
8. Slowing the transition to a clean energy future – competing with the Central West Renewable Energy Zone that starts at Wollar
9. 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

Please fully consider these facts and science, and the very significant impacts:

1. Aboriginal cultural heritage impacts

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.

2. Social impacts

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.

3. Biodiversity impacts

The proposed extension of mine disturbance will significantly impact two critically endangered ecological communities (CEEC) and eleven endangered fauna species.

Endangered microbats: 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 (SII).

Box Gum Woodland CEEC: 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 is not considered or assessed.

Regent Honeyeater: 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.

Koala: Impacts on landscape connectivity. The 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.

Expansion 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.

4. Water Impacts

The expansion will cause 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.

5. Not substantially the same project

The proposed extension should not be assessed as a modification because it is not substantially the same as the current mine approval:

- Falls outside the current mining lease
- Is part of a larger expansion project
- Mines to Wollar Village boundary
- Encroaches on Wollar Creek catchment
- Destroys an endangered microbat hotspot

- Causes additional biodiversity impacts under Federal environmental law
- Destroys a new area of Aboriginal cultural heritage significance

6. Not Justified

The proposal has been assessed to contribute \$21 million of net public benefit. This 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. There is no imperative to extend any current coal mine or generate new coal mining projects, and that would unnecessarily delay the transition away from coal mining

7. Intentional confusion - Assessment Reports

The exclusion of Cumbo Creek realignment and Rocky Hill significant cultural heritage site is a red herring in the Assessment Reports. This is a confusing and cynical exercise on the part of Peabody Energy attempting to offset the impacts of the proposed mine expansion. Emphasis throughout the assessment reports focusing on the exclusion of two areas from the existing mine approval creates a level of confusion and distraction. There is no requirement to seek a modification to leave coal in the ground. Cumbo Creek was never going to be diverted as it is too costly and Rocky Hill should never have been approved for destruction. The belated protection of the significant Rocky Hill cultural heritage site under the current approval for Pit 8 should not detract from the destruction of an additional 15 sites within the proposed mine expansion.

All these matters must be given due consideration. I repeat my strongest objection to Peabody Energy's proposal to expand Wilpinjong Coal Mine Mod 3 – Pit 8 Extension. There is no justification for expansion, nor development of new coal mine projects in the area. Transition away from coal mining must begin now.