



NSW Planning Portal Comment on

Wilpinjong Coal Mine Mod-3 -

Pit 8 Extension

30 October 2025

About Bushfire Survivors for Climate Action

Bushfire Survivors for Climate Action (BSCA) is a growing group of people who have been directly impacted by bushfires in Australia. We are a non-partisan, community organisation made up of bushfire survivors, firefighters and their families, working together to call on our leaders to take action to reduce emissions.

BSCA formed shortly after the Tathra and District fire in March 2018, and its founding members were all impacted by bushfires, including the Black Summer bushfires in 2019-20, Blue Mountains in 2013, Black Saturday in 2009 and Canberra in 2003.

In 2021, BSCA achieved a landmark victory in the NSW Land and Environment Court, resulting in a court ruling that the NSW EPA has a legal duty to act on climate change (*Bushfire Survivors for Climate Action Incorporated v Environment Protection Authority* [2021] NSWLEC 92).

As authors of this submission on behalf of Bushfire Survivors for Climate Action, we have lived experience of the impacts of climate change—through the loss of our homes and loved ones, the fracturing of our communities, and the destruction of our natural environment. We firmly believe that urgent and ambitious climate action by all levels of government is essential to protect the safety and future of all Australian communities and to reduce the impacts of climate change that we have already experienced first-hand.

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For further information on this submission please contact:

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SUBMISSION

We write to register our **objection** to the proposed project.

The proposed mine expansion **should be assessed as a new project, not as a modification**. The proposed project is substantially different from the currently approved mine and would facilitate a much larger expansion which would impact substantially on Wollar village as well as Aboriginal cultural heritage, agricultural land, and high value biodiversity habitat. The proposed project would fall outside the current mining lease, disturb an additional 155 ha including important habitat, impact on alluvial groundwater sources and surface flows of the Wollar Creek catchment, and abut the Wollar Village boundary. In the Wollar Village area, the project would increase local pollution, noise, dust and water contamination, disturbing the amenity and rural way of life.

However, **whether as a modification or a new project, its negative impacts outweigh any potential benefits to the local communities or the people of NSW as a whole.**

The mine expansion is **not needed to support the local economy**, and its negative impacts would outweigh its proposed public benefit. The NSW Government has prioritised the Central West Future Jobs and Investment Authority to support communities transitioning away from the coal industry and the Mudgee region is an ideal site for economic diversification. Wollar village is a community in the process of attempting to rebuild and rejuvenate. It is the starting point for the Central West Orana Renewable Energy Zone (CWOREZ), the first approved REZ in NSW, and a beneficiary of the transition to clean energy - this is where the economic future of the region lies. This means there is no local economic or employment justification for this mine - in fact, there is already a workforce shortage in the Central West due to the economic benefits of the renewable energy projects as well as workers needed in the construction and housing industries. Indeed, expanded coal mining would actively impede the urgently needed construction of the CWOREZ by competing for skilled workers.

The additional 25 MT of greenhouse gas emissions associated with the proposed mine expansion would **contribute excessively to climate change** at a time when all

actors urgently need to reduce emissions as strongly as possible. The proposed project is inconsistent with the Purpose and Guiding principles of the **Net Zero Future Act**¹ and incompatible with the IEA's Net Zero Emissions by 2050 Scenario.² The importance of reducing climate pollution is underscored by the recent **National Climate Risk Assessment**,³ which found among many other risks, that sea level rise and increased coastal hazards will significantly impact coastal communities and cities, *particularly in New South Wales* and northern Queensland;⁴ and by 2050, more than 1.5 million Australians will be living in areas that will experience risk from sea level rise. In addition, the Assessment finds that “**Dangerous fire weather days are projected to become more frequent in southern and eastern areas with a longer fire season and the potential for more megafires (high confidence)**”. This is especially alarming to people like our members, who have **already been impacted by bushfires**; and also particularly concerning in the context of NSW's housing crisis.

The most recent **NSW budget** states, “...**expenditure on natural disasters** has increased more than 1,000 per cent in the six years since the 2019-20 bushfires compared to the six years prior”.⁵ The Insurance Council of Australia found that extreme weather events in 2022 **cost every Australian household an average of \$1,532**.⁶ And healthcare costs alone from the Black summer bushfires were found to amount to \$1.95 billion,⁷ while a recent analysis found that extreme fire years like this are 88-152 percent more likely due to climate change.⁸ When the project's contribution to these risks and costs - and its competition with the CWOREZ - are subtracted from its projected \$21 million net public benefit, it rapidly begins to look not very beneficial at all.

Further, the **NSW Net Zero Commission** in its 2024 Annual Report⁹ found that while

¹ <https://legislation.nsw.gov.au/view/html/inforce/current/act-2023-048#frnt-lt>

² <https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach>

³ <https://www.acs.gov.au/pages/41f9b35a4c7041c68d33ee41552b0dce>

⁴ <https://www.acs.gov.au/pages/feature-article-1>

⁵ <https://www.budget.nsw.gov.au/sites/default/files/2025-06/bp1-budget-statement-chapter1-budget-overview-nsw-budget-2025-26.docx>

⁶ Insurance Council of Australia (2022)

<https://insurancouncil.com.au/resource/new-https://www.macrobusiness.com.au/2020/11/deloitte-climate-change-to-cost-australia-3-4tr-by-2070/research-shows-every-australian-pays-for-extreme-weather/>

⁷ Johnston FH et al. Unprecedented health costs of smoke-related PM2.5 from the 2019–20 Australian megafires. *Nature Sustain* 4, 42–47 (2021). <https://www.nature.com/articles/s41893-020-00610-5>

⁸ John T. Abatzoglou et al., 'Climate Change Has Increased the Odds of Extreme Regional Forest Fire Years Globally'. *Nature Communications* 16, no. 1 (2025): 6390. <https://doi.org/10.1038/s41467-025-61608-1>.

⁹ <https://www.netzerocommission.nsw.gov.au/2024-annual-report>

NSW has made progress in emissions reductions, achieving its 2030 and 2035 targets is only possible under the most optimistic scenarios, but not certain; and more effort is needed across all sectors of the economy to have a good chance of reaching them. The Commission also expressed concerns that the **resources sector specifically could put the state's targets in jeopardy** by increasing emissions associated with **new, extended and expanded coal mining projects**, considering the "sizeable pipeline" of projects in the planning system. This would unfairly put pressure on other sectors of the NSW economy to reduce emissions even more sharply to compensate for the excess pollution from the resources sector.

Conclusion

BSCA's members deeply understand the seriousness and urgency of climate change. **We object to this proposal**, because our mission is to help keep Australian communities safe.

Thank you for your consideration of our comment.

Yours sincerely,



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