

I object to Wilpinjong Modification 3. This should not be assessed as a modification. As the first stage for the much larger expansion (Pit 9 and Pit 10) it paves the way for a massive new mine right up to the northern boundary of Wollar village. This 'modification' falls mainly outside the current mining lease it is claiming to modify and as well the area of affected (destroyed) aquifers goes beyond Cumbo and Wilpinjong Creeks to a new catchment of Wollar Creek.

To put up a relatively small project and then on approval apply for endless modifications and expansions repeatedly has occurred since the 1980's in the Ulan/Wollar area; a cynical manipulation of the planning system, a project-by-project narrow focus where cumulative impacts are minimised or left out entirely from cost/benefit analysis and of course all generational costs borne by the community and the Goulburn River environment. If our Ulan/Wollar area is to have any hope for a future beyond the more than forty years endured so far of destructive ever-expanding coal mining I appeal to decision makers to demonstrate that the Planning system can work for the community by not to allowing such gaming of the system to be rewarded. This 'modification' proposal should be rejected or at least assessed as a new project.

Coal mining is an established industry that has operated profitably (for shareholders) over many years. However, coal operations cannot proceed independently, coal mining is dependent on public subsidy (Grudoff, M. & Campbell, R., *Fossil Fuel Subsidies in Australia 2025*, Australia Institute March 2025) mainly in the form of discounts on diesel and electricity usage as well as numerous tax write-offs. Apparently essential for coal mines to operate and be economically viable going forward. Coal company estimates of public benefit are not credible when the industry in question can only carry on if they are given significant and permanent State and Federal Government subsidies, not declared in the same document. It is no longer to the public benefit approving taxpayer underwritten high-risk mining expansions.

The known costs of further coal expansion are escalating and are posing dangers that cannot in any way be offset. We are living in a time where the existential threat of climate change no longer is a theoretical prediction: for all sensible people the debate is over and the need for urgent meaningful action long overdue. Approving coal mining expansions such as this, mainly so we can continue exporting subsidised thermal coal to Asia out to the 2030's and 2040's is acting against all evidence and will be viewed as a hostile act by future generations and our neighbours. A binding mine closure plan is urgently needed and the only responsible course of governance.

This proposal will downgrade the productive farmland surrounding Wollar Village and aesthetic value for visitors to the National Park and Nature Reserve. In addition, the proposal will permanently alter and degrade alluvial groundwater sources and surface flows in the Wollar Creek catchment, a major watercourse discharging into the Goulburn River. From the 1980's coal mines have been approved to destroy and relocate rivers, streams and watercourses in the Ulan/Wollar area, permanently altering surface and groundwater flows and exporting ever-increasing volumes of groundwater, salt and silt into the Goulburn/Hunter river system. Despite initial claims of nil discharge these coal mines have proven to be as much water mines as coal mines, unable to stay within pollution standards that are largely self-regulated. To my knowledge Peabody's WCM has been granted three separate emergency licences that suspend pollution limits on their mine water discharges. It currently has an EPA application to increase the volume of mine water discharge to 20

ML/day with that would dump three times the current salt load into Wollar Creek. This is not mentioned in the expansion application. This approved cumulative degradation of water quality and dewatering of the landscape covers an ever-increasing area of Goulburn River headwaters. Whatever assurances mine consultants' modelling may give to those seeking to deny what is happening over the headwaters of the Goulburn River, consequences equivalent in scale to dewatering a catchment of many gigalitres of groundwater over decades of time are an inescapable reality. Especially given this landscape historically has been ruled by extremely variable weather conditions and now further exacerbated by climate change. These landscape scale consequences also include the poisoned legacy of hypersaline final voids. Ironically the volume of mine water releases mask an awareness of this dewatering of the landscape and the staggering amounts of salt exported into the Goulburn/Hunter system. Consider the public outrage from the thousands of visitors to The Drip Gorge, Spring Gully and Big River in the National Park. Peabody's WCM will be long gone once the full costs from coal mining expansions are apparent. These costs will be borne by the community, including the significant risk of effectively sterilising this country for all future land-uses. Wilpinjong CM Mod 3 Pit 8 Extension is a cruel addition to this shameful process, sacrificing the Goulburn River catchment and cementing the ongoing depopulation of Ulan, Wollar and Bylong.

Further coal expansion will expose the Ulan, Wollar and Bylong area and anyone travelling through, to significant risk, worsening with each expansion approved. To ameliorate risk, based on my own experience as a long-time landowner and bush firefighter in the Ulan/Wollar area there is an urgent need for re-establishment of functioning communities in Wollar through to Bylong. The current situation is inherently unsafe due to depopulation from existing coal mining operations and will get even worse into the future if the return of people to the area is thwarted by approving yet more expansions. When fire emergencies occur or where there is need for responders to motor vehicle incidents over the vast area between Ulan to Rylstone and Bylong over towards Sandy Hollow, we rely on a diminishing number of responders or put unacceptable pressure on volunteers from surrounding areas to travel often for more than an hour. Responders get there late and already tired knowing that if they decline to attend then probably no one arrives to help at all; also conscious that they are leaving behind in their own locality reduced numbers or no emergency vehicles and responders. We need a functioning community to be protected from threats like fire. There needs to be outlets for travellers and residents to get information and help, or buy fuel or basic supplies. We hope to attract new people but can only expect them to stay if they have access to functioning natural systems including water, to be able to establish themselves, their family and business without the threat and uncertainty of further coal expansions.

The belated protection of the significant Rocky Hill cultural heritage site under the current approval for Pit 8 should not detract from Mod 3 proposed destruction of 15 additional Aboriginal Heritage sites. The Wollar community is preparing to rejuvenate and rebuild sustainably and productively alongside Wiradjuri people now reclaiming land in Wollar 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 urgently needed transition to clean energy. Look at the environment supporting this positive change and you will see the beautiful box grasslands around Wollar village. This is a landscape dependent on irreplaceable and precious alluvial groundwater resources. The assessment fails to adequately consider indirect impacts from the proposal on the threatened Box Gum Woodland CEEC and understates the extent of impact on this ecological community identified as groundwater dependent. 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.

It should be remembered that the coal mining proposal for Bylong was rejected on grounds citing destruction of groundwater and climate change. At the time of evaluating this latest expansion water resources has become even more precious and the costs of climate catastrophe more apparent. It is not only one village at stake; I believe that whether or not Bylong can be renewed as a functioning community is linked to the outcome in Wollar. It is hard to see any likelihood of people returning to Bylong or Wollar while mining companies are allowed to continue their expansions and before there are clear and binding mine closure plans. At a time when it is accepted wisdom that we need to make more housing available and Governments are struggling to provide community resources such as schools, we are approving and subsidising coal companies to leave whole villages empty and to bulldoze houses inconvenient for mining companies to maintain.

Over 30 km² of farmland and high biodiversity values between Goulburn River National Park and Munghorn Gap Nature Reserve already are affected by open cut mining, this Mod 3 is proposing to disturb an additional 155 ha and destroy more important habitat for the nationally threatened Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater and Koala. 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 that are critical breeding habitats including known maternity sites. It will directly remove mapped areas of important habitat for the critically endangered Regent Honeyeater. Further expansion of open-cut mining is creating an extensive barrier between the locally significant conservation areas of Munghorn Gap Nature Reserve and Goulburn River National Park by removing the closest points of intact remnant vegetation on the valley floor currently forming stepping stones of habitat between these two reserves.

Please reflect on this indigenous Elder man's wisdom, a kind and generous old man who has since passed away, speaking at a public meeting in Mudgee against further coal expansion and its effects on Aboriginal Peoples' culture and sacred sites where he made a simple appeal:

'You've already taken so much...'

Yours sincerely

Colin Imrie.

Ulan, NSW