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Personal submission SSD-6764 mod 3

I oppose the Wilpinjong Mod 3 Pit 8 extension plan for the following reasons:

- The burning of coal mined will exacerbate climate change and cause hardship and economic losses for the people of NSW and elsewhere in the world.
- The justification for the mine is based on incorrect logic. It should be assessed as a new mine not as a continuation.
- The design of the mine encroaches very close to the village of Wolar, and would severely impact the quality of life of the residents there.

The earth is warming and this is caused by greenhouse gases (GHG).

Increased temperature has many adverse effects on health. The most direct and obvious is through deaths during heatwaves, floods and fires, however less direct health effects occur due to droughts, expanding tropical diseases and disruption due to rising sea levels. Limiting global heating is a matter of preventative health on the grand scale.

The atmospheric concentration of CO₂ has risen from pre industrial levels of 280 ppm to a 2025 level of 430 ppm. This has increased global long term average temperature by 1.2 degrees, with the hottest single year being 2024 at 1.5 degrees above pre industrial levels . As there is momentum in climate systems, even the current level of greenhouse gases with no further emissions would be likely to push global temperatures beyond the 1.5 degree threshold.

Australia has committed to the Paris Agreement goals of limiting global heating to 2 degrees, and preferably 1.5 degrees above pre industrial levels. There is however a 90% chance that continuation of current policies will result in 2.3 to 4.5 degrees of global heating. This shows an important disconnect between what is needed and what is actually being done both in Australia and around the world.

Australia has a national target of reducing onshore GHG emissions by 43% by 2030, which is not sufficient to prevent dangerous global heating, but is commensurate with the efforts of other countries. Australia however is a major exporter of fossil fuels. In 2019 our domestic emissions were 1.4% of total global emissions while exported fossil fuels generated a further 3.6% of global emissions, ie 2.5 times greater. The accounting system developed for the Koyoto agreement, and continued for the Paris agreement regards the emissions from Australian coal burned in another country to be the responsibility of that country. This convention ignores the laws of physics that tell us GHG emissions will damage the climate in Australia, no matter in which country they are released.

There is a false argument that if foreign countries were not burning fossil fuel from Australia they would be directly substituting it with fuel from another source. This has been called "the drug

dealer's defence". It was dealt with in a 2019 judgement by Justice Preston of the NSW Land and Environment court in a decision about a different coal mine. [para 545]

"There is also a logical flaw in the market substitution assumption. If a development will cause an environmental impact that is found to be unacceptable, the environmental impact does not become acceptable because a hypothetical and uncertain alternative development might also cause the same unacceptable environmental impact. The environmental impact remains unacceptable regardless of where it is caused. The potential for a hypothetical but uncertain alternative development to cause the same unacceptable environmental impact is not a reason to approve a definite development that will certainly cause the unacceptable environmental impacts. In this case, the potential that if the Project were not to be approved and therefore not cause the unacceptable GHG emissions and climate change impacts, some other coal mine would do so, is not a reason for approving the Project and its unacceptable GHG emissions and climate change impacts."

The risks are becoming better understood:

The National Climate Risk Assessment released in September 2025 details the risks to Australia from climate disruption in greater detail and with more certainty than previous work. For instance a 3 degrees of warming scenario will increase heat wave deaths in Sydney by 440%, and the number of Australians living in areas exposed to coastal hazards will reach 1.5million by 2050. The economic disruption of 1.5 million people living in homes that are uninsurable, hence ineligible for bank finance, will far outweigh any temporary economic benefit from continued coal mining.

Mod 3 Pit is a new mine, not an extension

The proposed pit 8 is not contiguous with the previous pits, and the proponent has plans for future further mining adjacent to pit 8. The proposal should be assessed as a new mine, not as a modification.

The mine extension is not justified by the arguments given in the modification report

The net present value is claimed to be \$21 million, a paltry amount, showing that there is very little value in this mining.

The air quality report suggests that there will be no dust problem created by this new mining. This is the same as every other air quality report prepared for a coal mine over the last decades while dust from mining has continued to get worse during every year except high rainfall years affected by La Nina. Mine proponents always get the desired result from an air quality report, as that is what they pay for.

The claimed employment benefits are false, as there are plenty of new jobs created by the Central West Orana Renewable Energy Zone. There are large workforce needs in building the new energy economy and many good new jobs in the Hunter region, so the mines competing for the available workforce just prevents adaptation. Full speed coal production until the market collapses is not a good recipe for adaptation. Ceasing production at the end of the current approval will still require a large number of jobs in mine rehabilitation.

The mine encroaches on the village of Wollar.

The village of Wollar has been occupied by farmer settlers since 1868 and has had a church since 1875. People still live there despite many properties having been bought by the foreign owned coal company trying to take over the village. Residents will be exposed to blasting, dust, and heavy machinery noise.

Summary

The Wilpinjong extension proposal harms both the local and the global environment. It has insufficient merit to offset the harms and is not in the public interest.