



Submission of Objection: Peabody Wilpinjong Coal Mine Expansion (Mod 3 – Pit 8 Extension)

Submitted by: Sydney Knitting Nannas

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Introduction

The Sydney Knitting Nannas are a community group dedicated to the protection of land, water, and air for future generations. We are linked to Knitting Nanna groups across the state. This submission is to strongly object to the proposed expansion of the Peabody Wilpinjong Coal Mine and request that this proposal be rejected or failing that, be assessed as a new project, not as a modification, due to its scale and significant impacts. The proposal lies outside the current mining lease and should not be considered a modification. Treating it as such reduces public scrutiny and bypasses independent assessment.

A delegation of our group recently visited the area of Wollar and were alarmed to see the cumulative impact of coal mines in the surrounding area. We also viewed the unique landscape which will be lost if the proposed Peabody Mod 3 Pit 8 expansion were approved.

Key Points of Objection

Greenhouse Gas Emissions and pollution risk:

Peabody's Wilpinjong Coal Mine Expansion (Mod 3 – Pit 8 Extension) expansion would release over 25 million tonnes of additional greenhouse gas emissions. Additional risks include industrial noise levels day and night, light contamination, constant dust, intermittent blasting, spontaneous coal combustion and irreversible water contamination. These are huge impacts on the well-being of workers, surrounding community and on wildlife and biodiversity.

The project would slow the current transition to renewable energy and compete for skilled labour with Central-West Orana Renewal Energy Zone (CWOREZ) - the government's first REZ.

Project Scope:

The current Peabody Energy Wilpinjong Coal Mine has approval 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.

The proposed mine expansion should not be assessed as a modification. It should be assessed as a new application because it differs substantially from the current approved mine. Its purpose is to facilitate, in the near future, a much larger expansion that would surround Wollar village.

Peabody's proposed Mod 3, Pit 8 'expansion' would destroy a substantial area of significant Aboriginal cultural heritage. It would bring the mine up to the already much impacted Wollar Village boundary and encroach on Wollar Creek catchment, destroy endangered fauna and cause additional biodiversity impacts protected under Federal environmental law.

Proximity to Wollar Village and critically endangered ecological communities:

Mining would extend to the boundary of Wollar Village, disturbing an additional 155 hectares. It will significantly impact two critically endangered ecological communities and eleven endangered fauna species while increasing the loss of flows to Wollar and Wilpinjong Creeks.

Aboriginal Cultural Heritage:

The project would result in the loss of Aboriginal cultural heritage and destruction of significant sites for the Wiradjuri Nation. 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.

Social Impacts:

Pollution from current mining has had significant health and well-being impacts on Wollar and resulted in the dissipation of community. The proposed 'expansion' will take open cut mining operations to the boundary of Wollar Village, exacerbating these issues further. Directly attributable impacts of mining on the Wollar population's health and community life have not been addressed in the proposal.

The local community is working to rebuild and reinvigorate, following the designation of the area as a Renewable Energy Zone and with a return of Aboriginal people through successful land claims. The proposed 'expansion' would increase uncertainty, and hinder community rebuilding efforts.

Economic Justification:

The economic justification of more employment for the region does not stand scrutiny

as there is an acute workforce shortage in the region. There is a need for workers in the Renewable Energy Zone transformation. Now is the time to support transition to future energy generation and move away from climate-wrecking and polluting industries.

Climate impacts and costs to NSW communities for adverse climate related events will vastly outweigh any public revenue from royalties and taxes from this project. Local governments are unable to cover costs of floods, fire and weather catastrophes and now people are finding their properties uninsurable. Economic costs are falling on people and local communities, while corporations are not being held responsible for the pollution and climate disasters they are generating.

In addition we note that the International Court of Justice made a unanimous decision in recent months that responsibility for climate related harm associated with producing fossil fuels is the responsibility of the producer not just the user. What is the liability for climate harm from Peabody's existing license, let alone this proposed new mine 'expansion'?

Detailed Impacts for biodiversity and water

Biodiversity:

Peabody's proposed 'extension' in this area would impact critically endangered ecological communities and eleven endangered fauna species. See details below regarding four endangered communities that would be impacted by this proposal.

Endangered microbats: The new open cut area contains the highest density of the endangered Large-eared Pied Bat and the Eastern Cave Bat in this region. Two rocky hills will be removed, which are at the centre of the hotspot. These are critical breeding habitats including known maternity sites for these species, resulting in a Significant and Irreversible Impact (SAIL).

Box Gum Woodland Critically Endangered Ecological Community (CEEC): The assessment understates the extent of impact on the Box Gum Woodland CEEC and fails to adequately consider the proposal's *indirect* impacts. This community is identified as groundwater dependent and yet the potential impacts of the proposed groundwater drawdown on this ecosystem are not considered or assessed.

Regent Honeyeater: The proposed 'expansion' will directly remove mapped areas of important habitat for the critically endangered Regent Honeyeater. (Only 250-300 Regent Honey Eaters are left in the wild.) There are current records of breeding activity in the district that are not recognised in the assessment report. Projects in nearby localities to restore and create habitats for this critically endangered bird are underway, yet this project is proposing to destroy known ecologically in-tact habitat!

Koala: The proposed 'Expansion' will impact landscape connectivity. 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. This project 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:

This proposal will permanently alter and degrade alluvial groundwater sources and surface flows in the Wollar Creek catchment.

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 due to intercepting more water than predicted. In addition, increased salinity loads of up to 3.5 tonnes salt per day in mine discharge are a potential downstream water quality impact. Salination of water sources is an unacceptable impact for both humans and flora and fauna.

Conclusion

Peabody's proposed Wilpinjong Coal Mine 'expansion' Mod 3 Pit 8 will bring open-cut mining to the Wollar Village boundary, threaten endangered species and ecological communities, and undermine the region's clean energy transition. We urge that the proposal be rejected or at minimum assessed as a new project, rather than an expansion, with full independent scrutiny.