

Resource Assessment
Department Planning, Housing and infrastructure
Locked Bag 5022,
Parramatta NSW 2124

Thursday 30 October 2025

Submission of Objection: Wilpinjong Mod 3 – Pit 8 extension

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC has continued to object to the ongoing expansion of large-scale thermal coal mining in the Mudgee Region because of the cumulative impact of greenhouse gas emissions, loss of endangered biodiversity and destruction of vital water sources.

Economic Impacts

The Wilpinjong Coal Mine has approval to mine coal until 2033. This is an appropriate time to wind down thermal coal production from a mine developed primarily to supply Bayswater Power Station. Coal-fired power production in NSW is scaling back with Bayswater predicted to close as early as 2030 as part of the AGL Climate Transition Action Plan.²

An extension of the Wilpinjong Coal Mine is not needed to provide regional jobs. It falls within the Central West Orana Renewable Energy Zone that starts at Wollar with the Barigan Creek Switching Station, now under construction. Combined with additional construction work at Wollar Solar Farm and nearby Goulburn River Solar Farm there are multiple employment opportunities in the immediate vicinity of the coal mine. This coal mine is competing for labour needed in other industries.

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² <https://www.agl.com.au/about-agl/operations/agl-in-the-hunter>

The proposed mine expansion (the proposal) has an estimated public benefit of only \$21 million. This will not cover the cost of an additional 25 million tonnes of greenhouse gas emissions that will intensify climate change driven extreme weather events. Central West NSW is particularly vulnerable to variable climatic conditions. Recent intensive drought, bushfire, flood and storm events have threatened lives, homes and agricultural viability. Food and water security are threatened by climate change in the Central West. The cost of additional greenhouse gas emissions has not been factored into the economic assessment for this proposed thermal coal mine expansion.

This proposal is the first stage of a plan to continue producing thermal coal well beyond 2033. This is unsustainable and should be rejected on the grounds of no justification and a threat to the transition towards clean energy development.

Biodiversity Impacts

The cumulative impact on biodiversity of the three large mining operations in the Mudgee Region have not been assessed for the proposal. The significant cumulative loss of habitat including old growth trees, understory, grasslands, rocky outcrops, caves and ridgelines over hundreds of square kilometers has not been assessed.

The proposal is to disturb an additional 150 ha of landscape containing critical habitat values for a range of endangered and other species that has not been adequately assessed. The loss of grasslands over a significant area between Goulburn River National Park and Munghorn Gap Nature Reserve has removed foraging grounds for a large number of bird and mammal species.

Connectivity between the two conservation areas has continued to be removed by each additional expansion of this and neighbouring coal mines. The proposal to expand into a new area of habitat will continue to remove important native vegetation stepping stones that enable movements of endangered Koala, Regent Honeyeater and a range of birds and mammals across the landscape.

The removal of rocky outcrops providing habitat and breeding grounds for a significant number of microbats will cause a major cumulative impact. This area is a hotspot for microbats, possibly disturbed and relocated by current mining operations in the region.

The proposal is likely to have a significant and irreversible impact (SAII) on the endangered Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater, Koala and Pink-tailed Worm-skink.

The indirect impacts of mining on adjacent habitat has not been adequately assessed – noise, dust, blasting, night light, vehicle movement. This is particularly significant for microbat species. Destabilisation of adjacent fragile sandstone formations from blasting impacts is an indirect threat to important habitat.

Large-eared Pied Bat and Eastern Cave Bat: the proposed new area of disturbance contains the highest population of these endangered microbats in the region.³ A number of breeding sites will be removed. Populations near existing mining operations have declined. There is little proven evidence that offset measures such as revegetation elsewhere or man-made roosting boxes will alleviate the scale of proposed impact for these species. These offsets will not replace the specific requirements for breeding.

Regent Honeyeater: the proposed new area of disturbance is mapped as Important Habitat Area for this critically endangered species. The assessment has not acknowledged recent breeding records in the district demonstrating the presence of this species and possible likelihood of its use of habitat in the mapped Important Habitat Area.

Grassy Box Woodland CEEC: the assessment fails to address the cumulative loss of this critically endangered ecological community across the region due to mining disturbance. Any attempts at revegetation of this ecological community are not well reported and will not replace mature elements of overstory habitat for many decades. The analysis of Derived Native Grasses (DNG) in the proposed disturbance area is not supported as being less than 40% of the definition for the CEEC under the Commonwealth requirements.

The assessment of DNG demonstrates that only one of the Commonwealth requirements is not met and this is most likely because of the poor assessment methodology. The assessment claims that there are not ≥ 12 species of native understory non-grass species. However, the species list identifies 8 non-grass species and the assessment methodology did not include random transect searches to establish a reliable measure of diversity.

The flora assessment also fails to identify the Groundwater Dependent Ecosystems (GDE) in the form of riparian vegetation and threatened ecological communities that occur within the predicted groundwater drawdown in the Wollar Creek catchment. The GDE Atlas maps the alluvial flats along Wollar Creek and adjacent watercourses as '*high and moderate potential terrestrial GDEs*'. The mature vegetation within Wollar Village is not assessed for impacts of loss of access to groundwater.

The Aquatic Ecology Assessment fails to report the record of the vulnerable Giant Barred Frog in Wollar Creek⁴ or assess the likely impacts on this species, while spending considerable effort on the Booroolong Frog.

CWEC considers that the biodiversity impacts of this proposed mine expansion are significant and have not been adequately assessed. The proposal should be rejected on the grounds of cumulative and significant biodiversity loss.

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³ <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/nsw-bionet>

⁴ DPI, 2016. Water Sharing Plan for the Hunter Unregulated and Alluvial Water Sources 2009. Background document for amended plan

Water Impacts

The proposal will have significant cumulative impact on water sources in the locality. Of importance is that it shifts the open cut mining operations from the Wilpinjung Creek catchment into the Wollar Creek catchment. It will drawdown highly productive alluvial aquifers and reduce flows to Wollar Creek.

The assessment of water impacts is very poor and does not clearly identify the current water management issues on the existing mine site. The increase in salinity, the impact of discharges and the cumulative salt load to the Goulburn River is not adequately assessed.

There is very poor information on the volume of water expected to be intercepted by this mine expansion or the cumulative loss of base flows over time to the Wollar Creek system.

The additional groundwater drawdown under the Goulburn River National Park is likely to be highly significant and is not addressed. The water models used for predictions of impacts of current operations are inadequate and do not match real data. The lack of any recent gauged flow data in Wollar Creek is a major issue hindering the ability to assess the likely impacts of the proposal.

There is also a lack of groundwater monitoring bores within the proposed area of disturbance to provide background data.

CWEC considers that the cumulative impact on water sources in the district have not been adequately measured, monitored or reported. There are significant water management issues with the current mining operations that have not been identified in the assessment reports or in the context of additional water interception by the proposal.

The proposal should be rejected on the grounds of insufficient data to assess cumulative water source damage.

Aboriginal Cultural Impacts

The cumulative loss of Aboriginal cultural heritage and connection to the landscape in the region caused by mining impacts has not been addressed. The additionality of loss through the proposal has not been assessed.

The Goulburn River catchment area is highly significant for First Nations people who used the area as a major trading route from the east coast out to central Australia. The Wollar area also has evidence of permanent habitation.

The high use of the region by First Nations people is evident through the concentrated records of significant cultural heritage sites.

The NSW environment and heritage agency noted 8 years ago that it 'is concerned that harm to Aboriginal cultural heritage is approaching unacceptable thresholds for the region. Unless adequately compliant with a measured conservation regime, an imbalance of this scale may have permanent intergenerational consequences.'⁵

Social Impacts

The population decline of the Wollar district is directly attributable to the pollution emissions from the current approved mining operations at Wilpinjong Coal Mine. These impacts have not been mitigated in any meaningful way. There is a clear desire by remaining residents to support a functioning community with active use and maintenance of public facilities.

Because of the proximity to Goulburn River National Park and Munghorn Gap Nature Reserve, Wollar is a gateway for visitors to these popular natural areas, particularly birdwatchers and bushwalkers. The closure of the Wollar General Store and loss of fuel supplies for travelers has had a significant broader social impact than that identified in the Social Impact Assessment.

Members of CWEC are keen visitors to natural areas in the general region and have enjoyed participating in social events held by the Wollar community. The Wollar Community Hall provides excellent facilities for visiting nature tourists.

The proposal to mine up to the boundary of Wollar Village as the first stage of a larger project that will completely surround the Village with pollution from open cut mining operations in the form of noise, dust, blasting, odour and night lighting is intolerable.

The social impacts of increased greenhouse gas emissions will be felt across the Central West. These have not been assessed.

Conclusion

The proposal will have significant cumulative economic, environmental, cultural and social impacts. It should not be assessed as a Modification because it is substantially different from the existing approved operations and impacts. The limited modification assessment process has not identified key cumulative impacts or fully assessed a new area of proposed disturbance outside the current mining lease.

The proposal is the first stage of a larger new project as described by the proponent⁶ and should be assessed as a new project.

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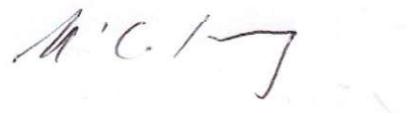
⁵ Quoted in IPC Statement of Reasons: Bylong Coal Project. Paragraph 511.

<https://www.ipcn.nsw.gov.au/sites/default/files/pac/projects/2018/10/bylong-coal-project/determination/bylong-coal-project-ssd-6367--statement-of-reasons-for-decision.pdf>

⁶ <https://wilpinjongmine.com.au/future-plans/>

For more information about this submission contact:
environmentcouncilcentralwest@gmail.com

Yours sincerely,

A handwritten signature in black ink, appearing to read "NICK KING".

Nick King
President