

## **Submission: Mod 3-Pit 8 Extension SSD 6764-Mod**

I make this submission initially based on **my objection to the application being for an 'extension' of the mine that was approved to 2033**. The area proposed for the 'Modification' falls outside the existing mining lease and is part of a plan for a more substantial expansion of Peabody's mine area which covers approximately 30 sq. kilometres, and will have significant impact on biodiversity, production farmland, and the cultural and community values of the proposed 'modification'.

That the long-suffering residents of Wollar will be subjected to significant and ongoing loss of their lifestyle, wellbeing and living conditions as this additional social disruption from a proposed expansion which will see mining right to the boundary of their village. It is not a 'modification' but rather should be considered as a substantial new project.

Social, environmental and economic impacts on the affected area should be fully assessed by the Independent Planning Commission, taking account of the economic, social and environmental impacts of the proposed expansion in the face of climate change.

### **KEY CONCERNS ABOUT THE PROPOSED MINE EXPANSION INCLUDE:**

- **New open cut mining in the face of climate change**

As the Climate Council (22 Oct 2025) summarises in the summary of its recent report

*"Climate pollution from coal, oil and gas now blankets the world, trapping heat. This heat means more evaporation and an atmosphere that holds more moisture. As a result, flood risk has grown in Australia".*

The Climate Council goes on to report that 30% of the properties at risk of flooding are in NSW. Many of these properties have become uninsurable and other homes in vulnerable areas are experiencing large losses in property value.

To this must be added the enormous costs of increased risk of catastrophic fires occurring more frequently and at greater intensity.

The \$21 million net benefit that the Wilpinjong Modification 3 has been assessed to provide does not take account of these enormous public costs arising from expansion of coal.

- **Implications for a transition to clean energy**

The transition to renewable energy as an alternative to further coal extraction and use is well under way, particularly in the Central West Orana Renewable Energy Zone, which includes the Wollar area that is deeply affected by the existing Peabody mine, and will suffer further impacts from the proposed 'Modification'. To extend coal mining through projects such as the Peabody Modification 3, and the flow-on to other adjoining areas would compete for already scarce skilled workers better employed in the construction and operation of renewables.

- **Impacts on Wollar village & other residents in the area**

Already the people of Wollar Village suffer significant impacts on their health, and social and emotional wellbeing. To allow the proposed Modification 3, which extends to the Village boundary, would further exacerbate these impacts. To this would be added the uncertainties around the likely life of those impacts, which at present are expected to wind down from this year under the existing Social Impact Management Plan.

- **Impacts on Aboriginal heritage**

The area in which these Peabody mines exist is Wiradjuri Aboriginal country, a region rich and diverse in Aboriginal culture.

Over 1000 sites have been recorded in the area over time - sacred and important sites within the Wiradjuri area including ceremonial sites, carved trees, bora grounds, burial sites, dreaming sites and initiation areas. At least 15 additional sites would be destroyed by the proposed 'Modification 3' – sites of significance that should be protected and conserved.

- **Impacts on local environment & biodiversity**

Impacts on the local environment and its biodiversity are numerous and significant.

Particular concerns are that the proposed 'Modification' area is habitat to both threatened species and Critically Endangered Ecological communities.

Both White -Yellow Box-Blakely's Red Gum grassy Woodlands and the Central Hunter Valley Eucalypt Forest & Woodland are recognised nationally as Critically Endangered and should be a priority for protection from further impacts. Having worked extensively on Grassy Box Woodlands earlier in my career, I am very aware of the extraordinary extent to which these important habitats have been cleared, and the key role that remaining remnant patches play as habitat to a range of important bird and animal species. Even if they may not be directly impacted by clearing for the proposed mine 'Modification', they will very probably be placed at risk by the water drawdown likely from the mining operations.

It has been reported that the proposed new Open Cut area contains the highest density of microbats in the region, with focus areas to be removed being critical breeding grounds for both the Large-eared Pied Bat and the Eastern Cave Bat. Removal of these critical breeding grounds is identified as a Significant and Irreversible Impact, one of the key factors in the recognition of these species being in decline and at risk of extinction.

Considerable conservation effort, both from government and from community volunteers, has been invested in efforts to secure the future of Regent Honeyeaters, connectivity of habitat for which will be adversely affected if intact vegetation in the valley floor is lost as a result of this proposed 'Modification'.

These impacts on the native vegetation in the area, and key species which rely on landscape connectivity and 'stepping stones' providing refuge across the landscape, are removed or depleted by the proposed 'Modification'.

The impacts on these nationally Critically Endangered Ecological Communities and various nationally Threatened Species also indicates that to merely treat this as a simple 'Modification' requiring no external and independent assessment is inadequate. The Peabody Wilpinjong 'Modification' should be referred to the Federal Government's Threatened Species Scientific Committee for rigorous scientific assessment of its impacts.

Already the Hunter Valley and its ecosystems have been severely depleted by large-scale open-cut mining. As coal plays a significant part in climate change, which is exacerbating extremes in climate and weather, it is essential that proposals such as the Peabody Wilpinjong open-cut 'Modification' are subjected to a high level of assessment.

## **CONCLUSION**

The 'Modification' proposed for Peabody's Wilpinjong coal mine should be assessed by an appropriately qualified independent panel as a new project. The above matters clearly suggest that it is not substantially the same mine that is currently in operation.

It is on this basis that I lodge this objection to the expansion process proposed.

## References cited

Climate Council (22 Oct 2025). Property value report: How climate change could worsen Australia's \$42 billion food risk. [https://climatecouncil.org.au/resources/property-value-report-how-climate-chnage-could worsen-australias-42-billion-flood-risk/...](https://climatecouncil.org.au/resources/property-value-report-how-climate-chnage-could-worsen-australias-42-billion-flood-risk/)

Submission by: Dr Judy Lambert BPharm, BSc(Hons), PhD, GradDipEnvManag, GradDipBusinessAdmin

Career as a research scientist, Canberra-based community sector environmental advocate, fulltime consultant to a former Federal Minister for Environment & Heritage, 20-year partnership in a successful small business specialising in environment & sustainable production. Elected Local Government representative for 9 years, including Chair of local planning & development committee.