

NSW Planning Portal

Major Projects

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Submission of Objection: Wilpinjong Mod 3 Pit 8 Extension SSD-6764-Mod-3

Introduction

The Wilpinjong Coal Mine has been subject to several modifications aimed at extending its operational life and increasing extraction capacity. The current proposal, Wilpinjong Mod 3 Pit 8 extension (Mod 3), seeks to further extend mining operations into new areas, with significant implications for the environment and local communities.

Mudgee District Environment Group (MDEG) objects to the proposed Mod 3 extension. This objection identifies and analyses significant concerns relating to the initial project assessment, community and social well-being, environmental impacts, and economic implications. The proposed extension raises substantial risks to air and water quality, biodiversity, landscape integrity, and the health and amenity of local communities. Furthermore, there is no economic justification for the project.

The lack of assessment of cumulative impacts in the region is of great concern. Moolarben Coal Complex and Ulan Coal Mine are nearby and assessing each of the three mines and each new project individually, makes a mockery of any attempt to measure, monitor, mitigate and manage the environmental degradation and negative social and community impacts which occur. It is the extent of the total impact that is relevant.

We urge you to reject the Mod 3 project.

Initial Project Assessment

The proposed extension should be assessed as a new project and should be subject to the full rigour of the planning system, including public critiquing of an Environmental Impact Statement provided by the proponent. It is not 'substantially the same project' as the existing mine; a condition which is required for an application to be considered as a Modification. This application moves into areas that are covered by an Exploration Licence (EL 9399). This Licence does not grant mining rights. MDEG contends that it is invalid for this project to be considered a Modification.

Critical analysis of the proponent's documents, including maps, shows that the real purpose of the proposal is to facilitate opening up additional mining opportunities in Pit 9 and Pit 10. The underhand manner of down-playing the real purpose of the project is indefensible.

The proponent claims that a key reason for this proposal is to avoid disturbing the Cumbo Creek corridor and the Rocky Hill complex which would be impacted under current approvals. MDEG understands that these two significant areas have already been deemed as 'no-go' areas by the proponent as revealed in Community Consultative Committee minutes, and by known agreement with local Aboriginal parties. A Modification is not needed to exclude and protect these areas. This misrepresentation of the proponent's objectives is deceptive.

The proposed extension must comply with a range of local, state, and federal laws, including the Environmental Planning and Assessment Act 1979 (NSW), the Protection of the Environment Operations Act 1997 (NSW), and the Environment Protection and Biodiversity Conservation Act 1999 (Cth). The proponent's supporting documentation reveals several areas of non-compliance or insufficient information, particularly in relation to biodiversity offsets, water management, and community consultation. The precautionary principle, as outlined in relevant planning instruments, requires that uncertainty regarding potential harm be resolved in favour of environmental protection. MDEG urges that the precautionary principle be applied.

Mod 3 also appears inconsistent with regional planning objectives that prioritise sustainable land use, protection of water resources, and maintenance of rural amenity.

Community and Social well-being

Impacts on Local Residents

Mod 3 will bring open cut mining to the edge of Wollar village. Local residents will experience increased noise, dust, vibration, traffic and night-time sky glow as a result of expanded mining operations. These impacts reduce the quality of life and increase health risks. The impacts and associated 'whole of community' costs are avoidable, by Mod 3 being rejected.

Past residents of Wollar are ready to return to the village due to the previously expected imminent winding-down of operations and closure of the mine. However, with the potential now of mining impacts increasing (due to Mod 3), the revitalisation of the community is at risk. Uncertainty and stress levels are contributing to an increased risk of mental ill-health and reduced well-being.

The proponent's community consultation process has been inadequate, with many residents reporting insufficient information and limited opportunities for meaningful engagement in decision-making. The Social Impact Assessment has identified seven positive potential social impacts, and only three potential negative social impacts if Mod 3 proceeds.

It is clear that Mod 3 should be rejected to enhance the opportunity for Wollar and the surrounding community to re-build and revitalise this significant locality.

Health and Well-being

There is a growing body of evidence linking coal mining activities to adverse health outcomes, including respiratory illnesses, cardiovascular disease, and mental health challenges.

The cumulative health impacts on nearby communities, when considered alongside existing operations, have not been fully assessed or addressed. The Mod 3 health risk assessment is based on outdated or incomplete data, failing to account for vulnerable populations and the potential for long-term, low-level exposure to pollutants.

Amenity and Lifestyle

The amenity of the local area is likely to be further diminished by increased noise, dust, vibration, traffic and night-time sky glow. Recreational opportunities, property values, and the overall attractiveness of the region for new residents and visitors will be negatively affected.

Cumulative impacts on the social fabric and resilience of small rural communities are significant, especially given the historical legacy of resource extraction in the region.

Cultural Heritage

There is evidence of continuous Wiradjuri occupation and connection to country within the Wilpinjong mine area and surrounds. More than 1000 sites have been recorded during many years of surveys. If Mod 3 were to be approved 15 sites would be destroyed. We are diminished by such actions. MDEG members urge that this destruction should not be permitted.

The project area contains sites of cultural significance for Aboriginal and non-Aboriginal communities. The proponent's heritage assessments have not been sufficiently comprehensive, and there is concern that important cultural values and sites may be overlooked or inadequately protected. Ongoing engagement with Traditional Owners and local historical societies is essential to ensure that cultural heritage is properly identified, managed, and respected.

Environmental Impacts

Air Quality

The expansion of open-cut mining operations is likely to result in increased dust emissions, both from blasting and from the movement of vehicles and machinery. Dust pollution poses significant risks to the respiratory health of local residents, particularly vulnerable groups such as children and the elderly.

The release of more than 25MT of additional Greenhouse Gases through this project is contradictory to the intent and actions required for Australian and international emissions reductions targets to be met. It is unprincipled to consider allowing such an increase.

The cumulative air quality impacts from the existing mine and proposed extension have not been adequately addressed, especially regarding the frequency of exceedances of national air quality standards. Furthermore, the effectiveness of proposed mitigation measures—such as water sprays and vegetative buffers—remains uncertain, particularly during periods of drought or extreme weather.

Water Resources

The proposed extension involves the disturbance of additional surface and groundwater systems. No results from monitoring of flow changes due to current mining operations have been provided. Therefore there is no baseline to determine future impacts. It is impossible to assess any mitigation or management strategies when there is no data to analyse.

Mod 3 moves coal mining into a new catchment and will cause a groundwater drawdown of more than 20m, as well as loss of base flows into Wollar Creek. There is a high risk of altered hydrological regimes, reduced water availability for downstream users, and contamination from sediment, heavy metals, and other pollutants.

The risks to water resources are unacceptably high, and MDEG does not support Mod 3 proceeding.

The proponent has not demonstrated adequate understanding of the cumulative impacts on regional water resources, particularly in the context of climate change and prolonged dry periods. The potential for acid mine drainage and the inadequacy of proposed water management plans is unacceptable. There is also concern regarding the long-term integrity of post-mining landforms and their ability to support natural drainage patterns.

Biodiversity and Ecosystems

The clearing of native vegetation for Mod 3 threatens several vulnerable flora and fauna species, some of which are listed under state and federal conservation legislation.

The project area includes remnants of endangered ecological communities, which provide critical habitat connectivity in an already fragmented landscape. The loss of habitat, increased edge effects, and potential introduction of invasive species are likely to result in significant and irreversible biodiversity loss. Vehicle strike is an increased risk, as mine vehicles and workers cars are moving about .

The mitigation and offset strategies proposed do not provide sufficient guarantees of equivalent ecological outcomes, particularly given the slow recovery rates of native woodlands and the uncertainty of offset site management.

MDEG members are particularly concerned about the loss of habitat and forage for cave-dwelling bats such as the Large-eared Pied Bat and Eastern Cave Bat. Night-time sky glow is a major disorienting and disrupting impact on these and all nocturnal fauna.

The iconic Regent Honeyeaters and Koalas must have this critical habitat protected. Captive-bred Regent Honeyeaters have recently been released in the Hunter Valley, and a new Koala National Park created. It is incongruous and contradictory to consider allowing destruction of existing known habitat for these iconic species. Mod 3 cannot proceed and threaten Serious and Irreversible Impacts on these species.

Landscape and Visual Amenity

The expansion will further alter the character of the local landscape, with increased visibility of mining infrastructure, spoil dumps, and disturbed land.

These changes have a cumulative visual impact, reducing the scenic and recreational value of the area for both residents and visitors. The proponent's visual impact assessment underestimates the significance of these effects on community well-being and regional identity.

Economic Implications

The proponent claims that the Pit 8 extension will deliver substantial economic benefits, primarily through job retention, local procurement, and continued royalty payments. However, these claims are not balanced against the potential economic costs associated with environmental degradation, public health impacts, and the loss of alternative land uses. There is limited evidence that the extension will result in significant net employment growth, as automation and efficiency improvements often offset labour requirements. The long-term costs of rehabilitation, potential liabilities for water contamination or biodiversity loss, and the risk of stranded assets in a transitioning energy market have not been adequately considered. A more holistic economic assessment would weigh the short-term benefits of continued coal extraction against the long-term interests of the community and environment.

There is a major labour shortage in the region and workers are urgently needed for renewable industries and supporting additional construction and housing. Extending or expanding coal mining is contrary to facilitating and achieving the needed energy transition.

Conclusion and Recommendations

In light of the significant environmental, social, regulatory, and economic concerns outlined above, this submission strongly objects to the approval of the Wilpinjong Mod 3 Pit 8 extension. The risks and uncertainties associated with the project outweigh the purported benefits, and the proponent has not demonstrated compliance with key legislative and policy requirements.

It is recommended that the regulatory authorities refuse approval for Mod 3 for the following reasons:

- This project is not a Modification as claimed by the proponent – it is a new project
- There are significant community and social well-being impacts
- There are substantial risks to air quality, water quality, biodiversity and landscape integrity
- There is no economic justification for the project.

This submission is made with the intention of supporting evidence-based decision-making that reflects the best interests of current and future generations.

Sincerely

Rosemary Hadaway

President: Mudgee District Environment Group