

30/10/25
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Dear NSW DPHI,

Please accept this document as a brief personal submission on the proposed Wilpinjong Coal Mine Extension MOD 3 - Pit 8 Extension.

I object to this development.

I am aware of an extensive critique of the impact of this development on Aboriginal cultural heritage and biodiversity. I too am concerned about these impacts.

As I have very limited capacity to comment on this development however, I have chosen to make only a few comments about why I object to this development on climate change / greenhouse gas grounds. As such, this submission comments primarily on Peabody's claims in [Appendix C. Greenhouse Gas Assessment](#).

That said, I would also like to make one comment on Appendix K, Social Impact Assessment. This document contains just two sentences on the social assessment of climate impacts that reads:

“Some respondents talked about how the impacts of climate change was very important to them. In that context they talked about the Modification as further contributing to these impacts.”

I don't think this constitutes a social assessment of the impacts of climate change on local people or on the natural and built environment of the locality. NSW DPHI should require Peabody to comply with the Mt Pleasant Court of Appeal decision. As I understand it, climate harms are a mandatory relevant consideration for the consent authority when looking at the likely impacts of the development under s4.15(1)(b).

25 Mt CO₂-e of additional emissions threaten climate tipping points and should not be permitted

Scope 3 emissions attributable to the 'Modification Only Scenario 1' are estimated at ~25Mt CO₂-e. These Scope 3 emissions must be considered in light of levels of current global warming and the significant risks associated with a likely failure to mitigate these emissions.

At point [170] of the recent NSW Court of Appeal decision on the Mt Pleasant coal mine, the judgement cited former Chief Scientist of Australia, Professor Penny Sackett:

“In Professor Sackett's view, unabated climate change is likely to be the greatest overall threat to the environment and people of NSW because it is comprehensively dangerous, global, fundamental, rapid, compounding, self-reinforcing, has delayed effects and, in some cases, including effects currently underway, is irreversible.”

A continuation of mining at Wilpinjong with little to no abatement of Scope 1 or Scope 3 emissions is clearly consistent with increased and continuing warming. As Professor Sackett said in regard to Mt Pleasant:

“Continued warming increases the risk that some subsystems of the Earth will cross “tipping points” that would cause irreversible changes.”

Peabody’s comments about duration of mining are misleading

At pg 60 they say: “It is noted that the Modification does not seek an extension to the timeframe for ROM coal production at the Wilpinjong Coal Mine and would cease ROM coal production prior to 2035 (i.e. ceasing on 31 December 2033).”

This is plainly misleading.

They say on their [website](#) right now that they are already planning a “Stage 2” application which proposes to “extend the life of the mine to the late 2030s.”

It’s nonsensical to claim that ongoing coal-mining with almost zero abatement constitutes “a meaningful contribution to NSW emission reduction targets”

At pg 60 they say: “It is considered that the Modification would make a meaningful contribution to NSW emission reduction targets because the Wilpinjong Coal Mine is a relatively low emissions intensity mine relative to its peers in NSW (and in Australia).”

This is a ridiculous claim.

Wilpinjong consistently emits more than 100,000 t CO₂-e in Scope 1 pollution. This puts their facility in the ‘Safeguard Mechanism’ category of Australia’s highest emitting industrial facilities. Prolonging a high-emitting activity with close to zero proposed onsite abatement is many things, but a “a meaningful contribution to NSW emission reduction targets” it is not.

Diesel emissions constitute the bulk of Scope 1 pollution - almost no abatement is proposed

In regard to diesel abatement, they claim - at pg 59 - that “the use of premium diesel is the only option currently considered for further reasonable and feasible evaluation (e.g. marginal cost of abatement analysis) in the period to 2033, including the Modification.” ‘Table 7, Summary of Identified Scope 1 and 2 Mitigation Measures’ suggests that this measure may only lower annual fuel consumption by 2%.

At page 27, they claim that “the Wilpinjong Coal Mine incorporating the Modification would cease coal production in 2033, and therefore alternatives to diesel-powered equipment are not applicable.” As noted above, Stage 2 is already planned to “the late 2030s” therefore their stated reason for failing to consider alternatives to diesel-powered equipment is likely to mislead DPHI’s assessment team and decision-maker.

At page 36, they double-down on their rationale:

“Major equipment purchases have already occurred with the expectation that coal extraction will ramp down and cease in 2033. As a result, opportunities for significant equipment replacement or major rebuilds are limited during the life of the Modification. No major capital fleet purchases would be required to undertake the operational activities associated with the Modification.”

Given their clear statement of intent to mine through to the late 2030s, NSW DPHI should require a credible analysis of diesel abatement through to 2040 and assess an ongoing failure to abate these emissions against the objects and targets within the state’s Climate Change (Net Zero Future) Act 2023.

Peabody’s offsets strategy is unclear, but appears set to contribute very little

Offsets are meant to be a last-resort and reserved only for ‘residual’ emissions. At page 31, they say: “WCPL expects to continue to rely on carbon credits to meet the majority of its Safeguard Mechanism obligations for the foreseeable future (Section 3.7).”

At pg 59 they say: “It is anticipated that the Wilpinjong Coal Mine (incorporating the Modification) would generate approximately 292,297 SMCs and would not require retirement of any additional ACCUs or SMCs over the life of the Modification.”

As noted by the NSW Net Zero Commission, NSW is not on track to meet any of its legislated abatement targets, including the 2030 target.

Wilpinjong is projecting it will produce 113,000 t CO₂-e in FY30. The NSW EPA does not recognise SMCs as offsets and carbon credits generated outside of NSW do not count as reductions in NSW. As far as I am aware, Peabody have not provided any assessment of their offsets strategy nor made any claims or pledges that they will source offsets in NSW. As such, any claims that offsets or SMCs surrendered will constitute abatement in NSW are not credible.

Peabody’s claim of a 15% reduction at a corporate level is designed to mislead NSW DPHI - Scope 1 emissions at Wilpinjong *increased* by 35% between FY18 and FY24

Peabody claims that at a corporate level, they reduced their “Scope 1 and Scope 2 greenhouse gas emissions by 15% from its 2018 baseline”. This claim is entirely irrelevant to this application. The matter before NSW DPHI for consideration is the environmental impact of *this development*. The relevant metric for DPHI to consider in this space, is the previous performance of this mine. Scope 1 data for Wilpinjong is available from the Clean Energy Regulator. In FY18, Wilpinjong’s Scope 1 emissions were 120,643 t CO₂-e. In FY24, they were 162,960 t CO₂-e. There was no 15% reduction on 2018 baseline emissions at Wilpinjong. Quite the reverse. Scope 1 emissions *increased* by 35% between FY18 and FY24.