



Healthy Rivers Dubbo

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NSW Department of Planning, Housing and Infrastructure

Via Planning portal

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**Submission Against the Wilpinjong Coal Mine Mod 3 – Pit 8 Extension**

**Application: SSD-6764-Mod-3**

**Status: OPPOSE**

Introduction

Healthy Rivers Dubbo is a grassroots community group providing a strong voice for our rivers, aquifers and wetlands for the benefit of wildlife, plants and people. Our focus is on protecting the waterways and groundwater systems that sustain both natural ecosystems and local communities.

We **strongly object** to the Wilpinjong Coal Mine Modification 3 (Pit 8 Extension) proposal. This expansion threatens the health of the Wollar Creek catchment, degrades groundwater systems, and adds to the cumulative pollution and water scarcity pressures already affecting the Central West region.

**This modification is not a minor adjustment, but a substantial new expansion that should be assessed as a new project. Its impacts on water, biodiversity, and the Wollar community are unacceptable and incompatible with a sustainable future.**

## Water Impacts

Healthy Rivers Dubbo's primary concern is the severe and irreversible impact on both surface and groundwater systems.

The proposed Pit 8 extension will:

- Cause a groundwater drawdown exceeding 20 metres,
- Reduce baseflows to Wollar Creek by more than 21 million litres per year, and
- Permanently alter terrestrial groundwater-dependent ecosystems (GDEs) that are integral to the landscape's ecological function.

These impacts are not adequately assessed, with no baseline monitoring established in the expansion area. The Wilpinjong Mine's poor history of water management including intercepting more water than predicted and releasing mine discharge with salinity loads of up to 3.5 tonnes of salt per day demonstrates an ongoing inability to protect water quality.

This degradation of the Wollar Creek catchment will harm aquatic ecosystems, riparian vegetation, and downstream users, contradicting both the *Water Management Act 2000 (NSW)* and the precautionary principle under environmental law.

For a region already stressed by drought, climate change, and competing water demands, further extraction and contamination of water is untenable. **Healthy Rivers Dubbo demands that the project be rejected on water impact grounds alone.**

## The Proposal Is Not a Genuine "Modification"

The project extends beyond existing approvals and lease boundaries, pushing open-cut mining to the edge of Wollar Village and disturbing an additional 155 hectares of sensitive land.

Its purpose is to facilitate a much larger future expansion that surrounds Wollar entirely. The modification process is being used to circumvent proper environmental assessment and public scrutiny.

**This proposal must therefore be assessed as a new project, requiring a full Environmental Impact Statement (EIS) that**

**includes hydrological modelling, cumulative water impacts, and independent review.**

### Cultural Heritage and Aboriginal Rights

The Wilpinjong area contains more than 1,000 recorded Aboriginal cultural heritage sites, with deep connections to the Wiradjuri Nation. The Pit 8 extension would destroy at least 15 additional sites, continuing the pattern of cultural and spiritual dispossession.

This destruction undermines the rights of Aboriginal people, particularly as Wollar's Aboriginal community is returning through successful land claims, and **breaches obligations to protect heritage and uphold the principles of self-determination and Country care.**

### Biodiversity and Ecosystem Impacts

The expansion threatens two Critically Endangered Ecological Communities (CEECs) and habitat for eleven endangered fauna species, including:

- The Large-eared Pied Bat and Eastern Cave Bat, whose breeding sites lie directly in the proposed excavation area,
- The Regent Honeyeater, a species recorded breeding in the local area, and
- The Koala, whose habitat connectivity between Munghorn Gap Nature Reserve and Goulburn River National Park would be severed.

The removal of two rocky hills central to the microbat hotspot represents a Significant and Irreversible Impact (SAII). The project also endangers the Box Gum Woodland CEEC, a groundwater-dependent ecosystem not adequately considered in the proponent's assessment.

### Climate and Energy Transition

By releasing over 25 million tonnes of additional greenhouse gases, this project will worsen the global climate crisis and directly undermine NSW's

Net Zero by 2050 target. The expansion conflicts with the Central West Orana Renewable Energy Zone (CWOREZ), which begins at Wollar and represents a cornerstone of the state's clean energy transition.

**Healthy Rivers Dubbo supports the transformation of Wollar into a renewable energy hub, not its continued exploitation for fossil fuels that damage water, air, and community wellbeing.**

### Social and Health Impacts

The Wollar community has already suffered from air pollution, noise, and social disruption caused by existing mining operations. Residents are working to rebuild and re-establish community life, supported by the CWOREZ transition. Extending the mine to the village boundary will undermine community recovery, perpetuate mental health distress, and diminish local amenity and safety.

**Even the proponent's Social Impact Assessment identifies more positive outcomes if the project does not proceed, acknowledging that stopping further expansion would allow Wollar to heal.**

### Economic Considerations

The claimed \$21 million net public benefit is illusory and dwarfed by the escalating climate, health, and water management costs borne by the public. Furthermore, the region's workforce is already needed in renewable energy, housing, and land restoration projects, not in perpetuating a declining coal industry.

**The NSW Government's Central West Future Jobs and Investment Authority exists precisely to manage this transition — new coal expansions only delay it.**

### Conclusion

The Wilpinjong Coal Mine Mod 3 – Pit 8 Extension:

- Threatens groundwater and surface water systems central to regional ecology and community health,

- Causes irreversible biodiversity and cultural heritage loss,
- Increases greenhouse gas emissions, and
- Undermines the Central West's renewable energy transition.

**Healthy Rivers Dubbo urges the Department to:**

- 1. Reject the Wilpinjong Coal Mine Mod 3 – Pit 8 Extension in full; and**
- 2. Require a new EIS that transparently assesses hydrological, ecological, and social consequences in line with contemporary environmental standards**

Thank you for the opportunity to comment.

Yours sincerely,

Healthy Rivers Dubbo Committee

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