



Nature Conservation Council

The voice for nature in NSW

Thursday 30th October 2025

Submission to the Department of Planning, Housing and Infrastructure RE: Wilpinjong MOD 3 - Pit 8 Extension, SSD-6764-Mod-3

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC objects to Wilpinjong Modification 3 – Pit 8 Extension due to unacceptable impacts on threatened species, climate and social wellbeing.

The project should be assessed as a development application

This modification proposal differs substantially from the currently approved mine and is not a minor modification – it is the first stage of a larger expansion of Wilpinjong, as publicised on the proponent's [website](#). Stage 2 intends to expand mining beyond Pit 8. This expansion would surround Wollar village. This application is not substantially the same development as the original consent. It is part of a larger expansion plan and should be assessed as a new development application with independent public scrutiny.

The project would threaten NSW's climate targets

The proposed project would release over 25 million tonnes of additional greenhouse gases, increasing the Scope 3 emissions by ~35% from 71.153 Mt to 96.129 Mt.

The NSW Net Zero Commission has warned that coal expansions and extensions risk endangering achievement of NSW legislated emission reduction targets.

Further, since coal from Wilpinjong mine supplies Bayswater Power Station, part of the mine's downstream emissions occur inside New South Wales. These emissions should be recognised and incorporated into the assessment of the project together with its Scope 1 and 2 emissions.



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In context of the recent NSW Court of Appeal ruling on the Mt Pleasant coal mine, the proponent should be required to conduct an evaluation of how climate scenarios consistent with the approval of coal expansions such as this project will contribute to climate change impacts on the local community and environment.

Loss of Aboriginal cultural heritage

The area surrounding the Wilpinjong mine has deep cultural and spiritual significance to the Wiradjuri Nation. The proponent indicates that 1,095 Aboriginal sites and potential archaeological deposits (PADs) have been recorded within the Wilpinjong Coal Mine and surrounds by various parties (Appendix H). This proposal would impact 15 heritage sites, 12 within the disturbance area and 2 within 100m of the disturbance area. Harm to cultural heritage is already substantial in the heavily mined region.

Destruction of critical biodiversity

The proposal would result in the disturbance of approximately 145 ha of native vegetation, comprising 20 ha of native woodland/forest and 125 ha of derived native grassland. This would destroy or degrade habitat critical to several nationally threatened species, including the large-eared Pied Bat, Eastern Cave Bat, critically endangered Regent Honeyeater, and the Koala. Habitat impacts for these species have already been substantial given fragmentation of the landscape due to mining.

This proposal would impact mapped Regent Honeyeater breeding habitat and potential habitat, impacting 28.81 ha of NSW DCCEEW mapped Important habitat. Whilst according to the proponent's biodiversity development assessment report (BDAR), Regent Honeyeaters were not recorded on site - this is unsurprising, as these bird species are nomadic.

The proposed open-cut extension would remove two central rocky hills that provide key breeding habitat, including known maternity sites, for Large-eared Pied Bat and Eastern Cave Bat.

Community and social impacts

The Wollar community has already borne unacceptable social costs from two decades of mining. Noise, dust, and constant blasting have forced many residents to sell their homes and leave. Those who remain are working to rebuild and revitalise the community, including the return of Aboriginal families through land claims. This project would create more uncertainty for the local community, and more noise pollution, dust, blasting, onsite coal ignition, lighting and potential water contamination.

NCC urges the Department to refuse Wilpinjong Modification 3 and require any further expansion proposals to be assessed as State Significant Development applications with full environmental, cultural, and social assessment.



Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW is Coal Mining and Methane Campaigner, Manjot Kaur (mkaur@nature.org.au).

Yours sincerely,



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CEO of Nature Conversation Council NSW

