



870 Ophir Rd
Summer Hill Creek
NSW 2800
www.cwecouncil.com

EPBC Referrals Unit
DCCEEW
GPO Box 3090
Canberra ACT 2601

Thursday 24 September 2026

Submission
Wilpinjong Continuation Project
EPBC Referral 2026/10626

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC welcomes the opportunity to provide comment on the referral of the Wilpinjong Continuation Project (the proposal) to be assessed under the requirements of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and any relevant reforms recently adopted by the Commonwealth Government.

CWEC supports that the proposal be assessed as a controlled action because of the significant impact on threatened species and water sources.

CWEC recommends that the proposal be rejected because of the significant landscape disturbance, ongoing fragmentation of threatened species habitat and additional cumulative impacts on surface and groundwater sources.

It is noted that very limited assessment information has been provided with the referral and that the proponent relies on future assessment processes. The significance of the impacts on Matters of National Environmental Significance (MNES) as listed under the EPBC Act are likely to cause the ongoing decline of threatened species, including critically endangered entities, and cause long term irreparable interference with water sources and ground water dependent ecosystems (GDEs)

1. Significant impacts under controlling provision S18

It is highly inadequate that this referral has been lodged before any targeted survey reports or documentation is available to better understand the likely significant direct and indirect impacts on MNES.

The referral document identifies records or likely habitat occurrence for 38 threatened species and one critically endangered ecological community listed as MNES in the action area. This is based on limited targeted surveys not yet completed. While to date six threatened fauna species have been recorded in targeted surveys, the action area is within the Mapped Important Habitat in NSW and within the Mudgee-Wollar Key Biodiversity Area. This is significant for the critically endangered Regent Honeyeater.

The stands of intact remnant woodland and isolated scattered old growth trees in the action area provide critical habitat features such as hollows, large supply of nectar, insects and other foraging and nesting resources. These critical vegetation remnants provide stepping stones across the landscape for threatened species providing connectivity for movement between the larger tracts of vegetation and adjacent conservation areas. They also occur on the valley floors which are more fertile and productive than the surrounding ridgelines and escarpments. The retention of remnant and fragmented woodland vegetation on valley floors is critical for the recovery of many threatened fauna species.

The Commonwealth Significant Impact Guidelines for critically endangered and endangered species include relevant considerations of population decline, fragmentation, effects on habitat critical to survival, disruption of breeding, habitat degradation or isolation, and interference with recovery. For vulnerable species, closely related criteria apply to important populations. For critically endangered and endangered ecological communities, the criteria expressly include reduction in extent, increased fragmentation, loss of integrity and interference with recovery.

The Commonwealth assessment should examine the proposal at an appropriately cumulative and landscape scale. CWEC considers the cumulative impact of loss of threatened species habitat through large scale mining the region must be a consideration.

It is significant that even with limited targeted surveys the presence of the threatened Koala, Large-eared Pied Bat, Box-Gum Woodland and Hoary Sunray have been recorded in the action area.

Clearing that causes ongoing fragmentation and habitat loss is a key threatening process for these MNES and prevents the implementation of recovery plans. The proposed disturbance to vegetation in the action area will have a significant impact particularly when considered in the context of impacts of existing Wilpinjong Mine operations and the proposed impacts of the Modification 3 expansion that has not yet been approved.

CWEC is of the opinion that the significance of the impacts cannot be offset or mitigated and that the proposal should be rejected.

2. Significant impacts under controlling provision S24D

CWEC expresses concern that the referral documentation contains no surface or groundwater assessment, even of a preliminary nature. This is surprising because a preliminary groundwater assessment report was submitted to the NSW Gateway Panel to consider impacts on Biophysical Strategic Agricultural Land (BSAL).

We note the critical advice from the Independent Expert Scientific Committee (IESC) identifying substantive shortcomings in the information presently available and the poor assessment of water resources in the past, knowledge gaps through lack of monitoring and issues with poor water models.

The issue of cumulative and compounding impacts from the proposal, additional to decades-long current operations, and regional impacts from the surrounding mines, is a major determining factor of significant impact. This is particularly due to increased groundwater drawdown and potential additional changes to flow regimes and water quality.

The proposal falls entirely within the Wollar Creek catchment and the open cut disturbance area encroaches quite closely to the creek alignment and will interfere with associated alluvium including highly productive alluvial sources.

Wollar Creek has previously been identified as vulnerable to hydrological changes and groundwater drawdown associated with surrounding coal developments, with relevant environmental risks including altered flow regimes, groundwater drawdown, impaired water quality and salinisation.

Downstream water users include Goulburn River National Park and landholders with basic rights and water access licenses. The cumulative impact of mining across the headwaters of the Goulburn River catchment has caused a significant change to flow regime, increased salt load and loss of base flows.

The riparian zones of Wollar Creek and Goulburn River contain GDEs that are sensitive to changes in water quality, flow regime and groundwater drawdown. The lack of assessment of impact on GDEs from this proposal is another key gap in information provided with the referral.

The IESC advice to the Gateway Panel identified that potential GDEs occur within and downstream of the action area and are likely to include threatened ecological communities listed as MNES. This includes Box-Gum Woodland CEEC.

The Water Sharing Plan for the Hunter Unregulated and Alluvial Water Sources (2022) has mapped areas of high-priority GDEs next to the action area. The presence of GDEs is also mapped in the Bureau of Meteorology Groundwater Atlas.

GDEs likely to be impacted by groundwater drawdown and altered water quality include subterranean, aquatic and terrestrial ecosystems. A comprehensive survey and assessment of GDEs and significance of impact is imperative to inform considerations.

3. Indirect significant impacts under controlling provisions S12, S15B, S16, S24B

The proposal to extract a further 70 million tonnes of coal with associated increased Greenhouse Gas (GHG) emissions until 2038 will further threaten capacity for NSW, Australia and international entities to achieve the commitment to net zero emissions by 2050 and interim targets needed to meet that goal.

The latest report from the United Nations Environment Program has indicated that the current status of emissions reduction will cause an over shoot of the agreed commitment to limit global warming to a 1.5° increase. Climate change is now on a trajectory to reach 1.8° warming with highly significant consequences for the natural environment.

This higher increase in average global temperature will have a significant impact on the Great Barrier Reef, Ramsar Wetlands, World Heritage and National Heritage areas.

The approval of any new or expanded fossil fuel production is highly irresponsible and will cause irreversible environmental, social and economic costs.

In conclusion CWEC considers that the impacts of the proposal are highly significant and cannot be mitigated or offset. This application should be rejected.

For more information on this submission contact:
environmentcouncilcentralwest@gmail.com