



## Nature Conservation Council

### Upload Your Submission by 17<sup>th</sup> February 11:59pm

1. **Submit online via the IPC Website:**  
[www.ipcn.nsw.gov.au/cases/moolarben-coal-complex-oc3-extension-project](http://www.ipcn.nsw.gov.au/cases/moolarben-coal-complex-oc3-extension-project)
2. **If you are having issues using the website, you can also email your submission to [submissions@ipcn.nsw.gov.au](mailto:submissions@ipcn.nsw.gov.au)**

### Update: 30 January 2026

#### **IPC Hearing Postponed, Written Submissions Still Open until February 17<sup>th</sup> 11:59pm.**

Yancoal has sought to delay the IPC hearing and disrupt community consultation on the Moolarben Open Cut 3 expansion by submitting last-minute minor amendments to its proposal.

The Department of Planning must now decide whether to accept these changes. We believe they should be rejected and the hearing should not have been postponed.

The amendments do not reduce the mine footprint or any vegetation clearing. They propose off-site “habitat enhancement” that will not lessen the serious impacts on threatened species and ecosystems. Making changes at this stage undermines the consultation process. This is a clear attempt to greenwash a damaging project.

**The IPC is still accepting written submissions until 17<sup>th</sup> February 11:59pm, but the 10 February public hearing has been postponed indefinitely.**

**Please make a submission and add a point that the proposed amendments do not reduce clearing of native vegetation, are far too late to be considered, and the proposal still would have severe impacts on biodiversity.**

## Background

Yancoal's Moolarben coal mine is an existing thermal coal mine for export located in mid-Western NSW near Mudgee on Wiradjuri Country. Yancoal is proposing to expand its Moolarben coal mine - the largest producing coal mine in the state of NSW.

The proposed expansion would clear critical habitat for koalas, Regent Honeyeaters, and micro bats, with plans to mine within 100m of the Munghorn Gap Nature Reserve, one of the oldest conservation reserves in the state. It threatens critical ecosystems, water sources, and cultural heritage on Wiradjuri Country. Despite the climate crisis and NSW's commitment to reducing emissions, this project would lock in additional, unnecessary and destructive emissions from coal mining.

## Key Points

### 1. **This area belongs in a protected nature reserve, not an open-cut coal mine**

This beautiful valley should be protected as part of a single conservation landscape with the Munghorn Gap Nature Reserve, not made into an open cut coal mine pit. The proposal would clear around 480 hectares of native vegetation and push mining to within 100 metres of the reserve, putting an area of high biodiversity at risk. At least 23 threatened species have been recorded in the area, including critical habitat for a uniquely resilient koala population. There is simply no justification to disturb this significant landscape and ecosystem - this project creates no new jobs, all it does is permanently destroy biodiversity.

### 2. **Unacceptable and irreversible harm to threatened species and ecosystems**

Yancoal's proposed expansion would cause serious and irreversible damage to nature, clearing irreplaceable native bush that cannot be offset. The project would destroy 113 hectares of koala habitat where breeding koalas have been recorded, including in the middle of one of the proposed mine pits. It would clear 80 hectares of Regent Honeyeater habitat with breeding females recorded on site, and up to 401 hectares of the nationally endangered Box Gum Woodland ecosystem. Impacts on threatened species such as the Regent Honeyeater, Broad-headed Snake and microbats are expected to be severe, a risk acknowledged by the NSW Environment Department, which warned the project could lead to long-term population declines and affect habitat critical to species survival. Despite this, noise and blasting impacts on Munghorn Gap Nature Reserve were poorly assessed, and Yancoal has refused to adopt a recommended 500-metre buffer to protect the reserve and its wildlife. This incredibly rich valley should never be up for mining and should be incorporated into the Munghorn Gap Nature Reserve.

### 3. **A massive climate cost that contradicts NSW climate goals**

The proposed OC3 extension would generate an estimated 64.6 million tonnes of greenhouse gas emissions over its life, equivalent to around 58% of NSW's total annual emissions, making its climate impact enormous. Yet DPHI's assessment ignores clear findings of the Net Zero Commission that any further coal mine expansions are inconsistent with the NSW Climate Change Act and the Paris Agreement, and fails to acknowledge that NSW is already off track to meet its 2030 and 2035 targets. The assessment also does not apply the Denman Court of Appeal decision, which requires decision-makers to consider emissions (including downstream emissions (99% of its emissions) and the local climate impacts they cause, leaving the true climate and economic costs of the project unquantified and unaddressed. The economic and social costs of these emissions have not been addressed by Yancoal.

#### **4. The expansion is not needed for jobs or regional prosperity**

The proposed expansion cannot be justified on employment grounds or benefits to the local community, as the Moolarben mine will continue operating until at least 2038 regardless of this expansion, and coal jobs in the region have remained unfilled for years. At the same time, Mudgee sits within the Central West Orana Renewable Energy Zone, where renewable energy projects are expected to create around 2,000 new jobs over the next decade, offering clear alternative employment pathways. Yancoal has indicated that 65% of coal from Moolarben will go to China, 10% to South Korea, 10% to Taiwan, 5% to Thailand, 5% to Japan, and 5% to Others. Given the forecasted decline in Australian thermal coal demand to China and South Korea especially - the economic argument could be even weaker than Yancoal has outlined in the May 2025 Resource Assessment. Clearly, the expansion would deliver little economic benefit while imposing lasting environmental damage, making its costs far greater than any claimed public benefit.

#### **5. Serious and long-lasting risks to groundwater and creeks**

The project is expected to cause significant groundwater drawdown of 2–6 metres, potentially lasting up to 25 years after mining, placing Moolarben Creek at serious risk as a critical drought refuge for wildlife. Independent experts have warned that groundwater-dependent ecosystems along the creek, including deep-rooted riparian trees, are likely to be affected by drawdown of up to 5 metres in the alluvium. These risks are compounded by the proponent's failure to undertake adequate baseline water monitoring and its poor track record of complying with water monitoring requirements elsewhere in the mine complex. Yancoal are proposing an amendment to conduct 12 months of groundwater monitoring studies before they commence mining - this is inadequate, baseline groundwater monitoring studies should occur before a project is approved, not after.

#### **6. The expansion will irreversibly harm Wiradjuri cultural heritage**

The project will destroy 55 irreplaceable Aboriginal cultural artefacts, and potentially impact dozens of others. They are all considered to have high cultural value by the Registered Aboriginal Parties consulted on the proposal. This expansion contributes to the fracturing of the landscape, and to the cumulative degradation of Country from ongoing mining, undermining the Wiradjuri people's ability to practice culture, maintain connection to Country, and preserve sacred sites of immense and irreplaceable significance.

### **7. The cumulative impact**

There has been poor assessment of the cumulative impact of this proposed Moolarben Mine expansion combined with the proposed expansions of neighbouring mines. All proposed expansions have impacts on a similar set of threatened species listed as likely to have Serious and Irreversible Impacts due to clearing and loss of habitat. The Ulan Coal Mine Modification 6 and 8 and the Wilpinjong Coal Mine Modification 3 will impact an additional large area of similar landscape, connected water sources, rich biodiversity and cultural heritage values.

## **Example Submission**

To the Independent Planning Commission,

My name is Violet, I am a 30 year schoolteacher in Western Sydney and I am deeply concerned about the expansion of coal mining in our states, due to the climate impacts being felt in my area. Students at my school are already sitting through extreme heatwaves, our energy bills are going up due to the added cost of air conditioning, and I know communities across NSW are facing the same struggles.

I am writing to object to Yancoal's proposed Moolarben OC3 coal mine expansion near Mudgee on Wiradjuri Country.

I am concerned that this project would cause serious and irreversible harm to the environment, climate and community, and should not be approved. This rich biodiverse area should be incorporated into the Munghorn Gap Nature Reserve and protected.

In particular, I am concerned about:

- Threatened species and habitat loss, including the clearing of over 113 hectares of koala habitat where koalas and breeding have been recorded, as well as Regent Honeyeater and microbat habitat. No biodiversity offsets can replace habitat that is already supporting threatened species.
- Impacts on Munghorn Gap Nature Reserve, with mining proposed within 100 metres of the reserve and inadequate assessment of noise, blasting and vibration impacts.
- Water and groundwater risks, including long-term groundwater drawdown that could harm Moolarben Creek and groundwater-dependent ecosystems that are critical drought refuges for wildlife.

- Climate impacts, with the project producing an estimated 64 million tonnes of additional greenhouse gas emissions at a time when NSW is not on track to meet its legislated emissions reduction targets.
- Lack of public benefit, with no clear jobs justification for expanding coal mining in a region where renewable energy development is being prioritised.

The NSW Government cannot afford to approve new or expanded coal projects during a climate and biodiversity crisis. This proposal is inconsistent with the NSW Climate Change (Net Zero Future) Act 2023 and the goals of the Paris Agreement.

For these reasons, I urge the Independent Planning Commission to recommend that the Moolarben OC3 Coal Mining Extension Project be refused.

Thank you for considering my submission.

Sincerely,

Violet Smith

Westmead NSW 2145