



Comment on

NSW Independent Planning Commission

**Moolarben Coal Complex OC3
Extension Project**

17 February 2026

About Bushfire Survivors for Climate Action

Bushfire Survivors for Climate Action (BSCA) is a growing group of people who have been directly impacted by bushfires in Australia. We are a non-partisan, community organisation made up of bushfire survivors, firefighters and their families, working together to call on our leaders to take action to reduce emissions.

BSCA formed shortly after the Tathra and District fire in March 2018, and its founding members were all impacted by bushfires, including the Black Summer bushfires in 2019-20, Blue Mountains in 2013, Black Saturday in 2009 and Canberra in 2003.

BSCA has been at the cutting edge of legal reform to reduce climate emissions and hold governments, agencies and companies to account. **In 2021 we took the NSW Environment Protection Authority to court challenging them on their lack of action on climate change and won.** [Our landmark win in the NSW Land and Environment Court](#) was the first time that an Australian Court ordered a government to take meaningful action on climate change.

As authors of this submission on behalf of Bushfire Survivors for Climate Action, we have lived experience of the impacts of climate change—through the loss of our homes and loved ones, the fracturing of our communities, and the destruction of our natural environment. Urgent and ambitious climate action by all levels of government is essential to protect the safety and future of all Australian communities and to reduce the impacts of climate change that we have already experienced first-hand.

www.bushfiresurvivors.org

Submitted to:

<https://www.ipcn.nsw.gov.au/form/moolarben-coal-complex-oc3-extension-project>

For further information on this submission please contact:

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SUBMISSION

We write to register our **objection** to the proposed project.

Bushfire Survivors for Climate Action represents **people who have been severely impacted by the physical impacts of climate change**. Our members' losses range from damaged mental and physical health and wellbeing, deep impacts across communities, through to massive tangible and financial losses; and while some of these losses have eventually been recovered through enormous effort and determination, many continue long term. We also know that even in the best case scenario the numbers of climate-impacted people in NSW will only continue to swell due to floods, storms, sea level rise and other impacts. Therefore, we advocate for the strongest, most rapid climate pollution reduction possible.

The project being considered here is for export, a **profit-taking commercial enterprise, not a public good**, and its benefit to the people of NSW is limited. There is **no clear jobs benefit**, as Mudgee sits within the Central West Orana Renewable Energy Zone. Conversely, the project would cause **substantial local environmental damage** which the people of NSW would have to bear. In addition, the **emissions from the overseas burning of exported coal are just as harmful to the people, environment and economy of NSW as if the coal were burned here**.

The NSW **Net Zero Future Act**¹ legislates emissions reduction targets, and while the domestic electricity sector is making progress in transitioning to renewables, exports continue apace. The proposed project's additional 64.6 MT of climate pollution would **contribute excessively to climate change** at a time when all actors urgently need to reduce emissions as strongly as possible. The importance of reducing climate pollution is underscored by the recent **National Climate Risk Assessment**,² which found among many other risks, that sea level rise and increased coastal hazards will significantly impact coastal communities and cities, **particularly in New South Wales** and northern Queensland;³ and by 2050, more than 1.5 million Australians will be living in areas that will experience risk from sea level rise. In addition, the Assessment finds that **"Dangerous fire weather days are projected to become more frequent in southern and eastern areas with a longer fire season and the**

¹ <https://legislation.nsw.gov.au/view/html/inforce/current/act-2023-048#frnt-lt>

² <https://www.acs.gov.au/pages/41f9b35a4c7041c68d33ee41552b0dce>

³ <https://www.acs.gov.au/pages/feature-article-1>

potential for more megafires (high confidence)". This is especially alarming to people like our members, who have **already been impacted by bushfires**; and also particularly concerning in the context of NSW's housing crisis.

The most recent **NSW budget** states, "...**expenditure on natural disasters** has increased more than 1,000 per cent in the six years since the 2019-20 bushfires compared to the six years prior".⁴ The Insurance Council of Australia found that extreme weather events in 2022 **cost every Australian household an average of \$1,532**.⁵ And healthcare costs alone from the Black summer bushfires were found to amount to \$1.95 billion,⁶ while a recent analysis found that extreme fire years like this are 88-152 percent more likely due to climate change.⁷ The project's contribution to these risks and costs - and its competition with the CWOREZ - should be subtracted from its projected financial benefit, before any assessment is made based on monetary contributions to the state.

The **NSW Net Zero Commission** in its 2024 Annual Report⁸ found that while NSW has made progress in emissions reductions, achieving its 2030 and 2035 targets is only possible under the most optimistic scenarios; and more effort is needed across all sectors of the economy to have a good chance of reaching them. In particular, the Commission expressed concerns that the **resources sector specifically could put the state's targets in jeopardy** by increasing emissions associated with **new, extended and expanded coal mining projects**, considering the "sizeable pipeline" of projects in the planning system. This puts unfair pressure on other sectors of the NSW economy to reduce emissions even more strongly to compensate for the excess pollution from the resources sector. In its Coal Mining Emissions Spotlight report⁹ the Commission found that further coal mine expansions are inconsistent with the NSW Climate Change Act and the Paris Agreement. And importantly, last year's **NSW Court of Appeal in DAMSHEG v MACH Energy Australia**¹⁰ requires decision-makers to consider the local impacts of climate change caused by all the

⁴<https://www.budget.nsw.gov.au/sites/default/files/2025-06/bp1-budget-statement-chapter1-budget-overview-nsw-budget-2025-26.docx>

⁵ [Insurance Council of Australia \(2022\)](https://insurancecouncil.com.au/resource/new-https://www.macrobusiness.com.au/2020/11/deloitte-climate-change-to-cost-australia-3-4tr-by-2070/research-shows-every-australian-pays-for-extreme-weather/)

<https://insurancecouncil.com.au/resource/new-https://www.macrobusiness.com.au/2020/11/deloitte-climate-change-to-cost-australia-3-4tr-by-2070/research-shows-every-australian-pays-for-extreme-weather/>

⁶ Johnston FH et al. Unprecedented health costs of smoke-related PM2.5 from the 2019–20 Australian megafires. *Nature Sustain* 4, 42–47 (2021). <https://www.nature.com/articles/s41893-020-00610-5>

⁷ John T. Abatzoglou et al.. 'Climate Change Has Increased the Odds of Extreme Regional Forest Fire Years Globally'. *Nature Communications* 16, no. 1 (2025): 6390. <https://doi.org/10.1038/s41467-025-61608-1>.

⁸ <https://www.netzerocommission.nsw.gov.au/2024-annual-report>

⁹ <https://www.netzerocommission.nsw.gov.au/publications/coal-mining-emissions-spotlight-report>

¹⁰ <https://lsj.com.au/articles/climate-change-concerns-lead-court-to-overturn-mount-pleasant-coal-mine-expansion/>

emissions - **including downstream emissions** - in assessing projects. **All these clearly point to a conclusion that this project should be refused.**

In addition to the enormous climate risk posed by the proposed project, the project would also significantly impact **groundwater and creeks**, and put a high **biodiversity** area at substantial risk. The project would clear over 400 hectares of native vegetation and bring the mine to within 100 metres of a Nature Reserve. Noise, blasting, vibration and dust would compound these impacts. The area includes **critical koala breeding habitat** at a time when NSW's koala population is already under severe pressure, plus habitat for at least 22 other threatened species including the Regent Honeyeater. Clearly, this habitat clearing cannot be offset. The project would also exacerbate the cumulative impact of other local mines already damaging the biodiversity of the area, including Ulan Coal Mine Modification 6 and 8 and the Wilpinjong Coal Mine Modification 3.

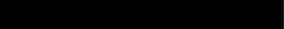
We understand that the proponent has submitted **last-minute amendments**, regrettably resulting in the delay of the public hearing on this matter. We recommend that these changes be rejected, as they do not reduce the amount of native vegetation proposed to be cleared, nor the footprint of the mine. As the Commission no doubt knows, off-site habitat enhancement cannot replace the clearing of critical breeding habitat for threatened species.

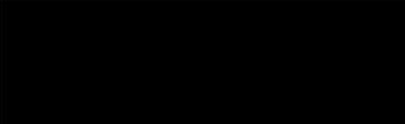
BSCA's members deeply understand the seriousness and urgency of climate change, and our mission is to help keep Australian communities safe from climate change. **We urge the Independent Planning Commission to recommend that the Moolarben OC3 Coal Mining Extension Project be refused.**

Thank you for your consideration of our comments.

Yours sincerely,



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