



# Hunter Environment Lobby Inc.

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17<sup>th</sup> February 2026

## **Moolarben Open Cut 3 expansion – Objection**

Hunter Environment Lobby Inc.(HEL) is a regional community-based environmental organization that has been active for well over thirty years on the issues of biodiversity, environmental degradation, species and habitat loss, and climate change.

The group has been represented on NSW Government committees including the Hunter River Management Committee, Mount Owen Mine Flora and Fauna Management Committee, Lower Hunter Regional Strategy Working Group, Upper Hunter Air Quality Monitoring Network Advisory Committee and the Lostock to Glennies Creek Pipeline Proposal and presently the Hunter Environment Advisory Group.

HEL has commented on and objected to many of the existing and further modifications to coal mines in the Hunter for the time we have existed, most of these objections relating to environmental factors.

Factors such as biodiversity impacts, loss of habitat and remnant vegetation, impacts on loss and quality of groundwater, air quality impacts on communities in the Hunter, and noise impacts on adjacent communities are all important issues which we believe have not been given the priority they deserve.

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.

We believe that 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 offsite “habitat enhancement” that will not lessen the serious impacts on threatened species and ecosystems onsite. Offsite enhancement does not alter what will happen at this site. Making changes at this stage undermines the consultation process. This is a clear attempt, we believe to greenwash a damaging project.

HEL sees 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. Once again an unacceptable solution for endangered and threatened species in this area.

HEL maintains that 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.

We see also that 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.

Again, 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, Broadheaded 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. We maintain that this incredibly rich valley should have never been included in mining areas and should be incorporated into the Munghorn Gap Nature Reserve.

We can see that 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.

We have not expanded on the dire effects this proposal has on ground water and creeks as well as the cumulative effects on climate and biodiversity, however we are afraid that it is looking every bit as bleak as the previous warnings we have given on these issues for this proposal. For these and all the points above we warn against an approval for this project.

Yours in trust,

A solid black rectangular box used to redact the signature of Jan Davis.

Jan Davis  
President Hunter Environment Lobby Inc.