

16 February, 2026

The Commissioner
Independent Planning Commission
Suite 15.02, Level 15
135 King St
SYDNEY NSW 2000

By email: submissions@ipcn.nsw.gov.au

Dear Commissioner

Re: Moolarben OC3 Coal Mine Extension Project, SSD-33083358

The Illawarra Knitting Nannas Against Greed (IKNAG) are writing to express our strong objection to the proposed Moolarben extension.

Further we were surprised and disappointed to hear that Yancoal has made additional, minor amendments to its proposal, which have resulted in the postponement of the Independent Planning Commission hearing and community consultation. The changes involve offsite 'habitat enhancement', and do not reduce the mine footprint or vegetation clearing. IKNAG's view is that these amendments should also be rejected, with the hearing and community consultation to recommence as soon as possible.

Demand for coal and coal mining jobs

The Moolarben coal mine produces thermal coal for export. We feel strongly that the valley should not be mined, it should be protected as part of the Munghorn Gap Nature Reserve. The Reserve is the second oldest nature reserve in Australia, an area full of Wiradjuri heritage, and home to 164 species of birds including the endangered regent honeyeater.¹

Amongst market and climate realities of the ever reducing demand for thermal coal, increasing costs, climate risks and labour shortages,² it makes little sense to allow 480 ha of native vegetation near Munghorn Gap Nature Reserve to be cleared for mining. If this proposal is approved, there would be mining up to 100 m from the Reserve boundary.

¹ NSW Government, Visiting and exploring NSW, NSW locations and attractions, Munghorn Gap Nature Reserve.

² Institute for Energy Economics and Financial Analysis, *Australia pursues adding 1.8 billion tonnes of thermal coal despite declining market conditions*, A. Knight, 16 December 2025.

Coal jobs in the Mudgee region have remained unfilled for years. At the same time, the REZ is expected to create 2,000 new jobs, offering a solid transition to the future for coal miners.

Koala habitat

A uniquely resilient koala population has been found in the region. Science for Wildlife has found that bushland stretching from Munghorn Reserve towards Rylstone contains highly suitable habitat, and researchers found dozens of dozens of koalas.³ There is no justification for endangering this habitat.

Impacts on water

In June 2024 the Independent Expert Advisory Panel for Mining reported that the proposed extension adjacent to the OC3 mining area would result in groundwater drawdown in alluvial, Permian overburden and Ulan seam groundwater systems beneath and immediately adjacent to each open cut pit. Further there is a moderate to high risk that shallow groundwater could be dewatered or become ephemeral along Moolarben Creek, reducing the groundwater available for riparian vegetation.

Current groundwater and surface water monitoring network and data sets are not sufficient to assess potential impacts of mining operations across and immediately adjacent to the OC3 extension area. Additional groundwater monitoring, which includes at least a 12 month period of baseline monitoring, is required to further assess the potential risk to groundwater dependent ecosystems.⁴

While Yancoal has proposed an amendment to conduct the 12 months of groundwater monitoring studies, this should occur before project assessment.

Climate change

This proposed expansion will produce approximately 65Mt of greenhouse gas emissions over its life. This is completely unacceptable and contrary to recent decisions and recommendations which recognise the harm being done by coal mine emissions.

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<https://www.abc.net.au/news/2025-11-17/mudgee-koala-mapping-finds-critical-population/105977120>

⁴ Independent Expert Advisory Panel for Mining. ADVICE RE: MOOLARBEN COAL COMPLEX OC3 Extension Project (SSD-330833580) Date: 17 April 2025 (Re-issued 4 June 2025)_ Report No: IEAPM 202504-01.

The United National International Court of Justice (ICJ) has issued a landmark *'advisory opinion'*, stating that nations can be held legally accountable for their greenhouse gas emissions. Recognising the 'urgent and existential threat' facing the world, the ICJ concluded that those harmed by human-caused climate change may be entitled to 'reparations'.⁵

Closer to home, the NSW court of appeal has overturned the approval of the largest proposed coalmine expansion in the state, at the Mt Pleasant mine near Muswellbrook. A community environment group successfully argued that the planning commission failed to consider the impact of all of the project's greenhouse gas emissions.

The Net Zero Commission recently found that consistent with the objectives of the *Climate Change (Net Zero Future) Act 2023*, NSW consent authorities need to meaningfully consider greenhouse gas emissions and their impacts in all planning decisions, including those for additional coal mining.⁶

This proposal has the potential for significant deleterious impacts on biodiversity, water quality and climate change, and we cannot see any significant benefits that would accrue if the project was approved.

Thank you for considering our submission.

Yours sincerely

Cherry Hardaker

[REDACTED]

Anne Kelly

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Illawarra Knitting Nannas Against Greed

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<https://www.carbonbrief.org/icj-what-the-world-courts-landmark-opinion-means-for-climate-change/>

⁶ Net Zero Commission. *Coal Mining Emissions Spotlight Report*. December 2025.