

To the Independent Planning Commission,

Tuesday, 13 January 2026

I am Don White, living in Yengo National Park on the southern edge of the Hunter region.

I have a strong and lifelong concern about the effects of Coal mining in the Hunter and across Australia. These effects include the impact of climate change when coal is burnt... wherever that may occur. I am also concerned about the effect of coal mining on the biodiversity in the area cleared, the failure to properly remediate, the effect on water tables and the social disruption coal mines cause in communities, notwithstanding the short-term benefits to a few workers in mining towns

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.

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 estimated to produce 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,

Prof Don White

Laguna. NSW. 2325

Moolarben Coal Complex OC3 Extension Project

Key Facts

- **Total disturbance area:** 675 ha at risk from clearing and mining activities.
- **Coal extraction:** this project will add approximately 30Mt ROM (run-of-mine) coal, resulting in around 25Mt product coal produced over the life of the mine to 31 December 2038.
- **Climate cost:** Over the life of the OC3 mine extension an additional 64 million tonnes of GHG emissions will be produced.¹
- **Native species impact:** Yancoal is proposing to clear 113ha of Koala habitat with breeding Koala's on site, as well as 80ha of Regent Honeyeater habitat, also with breeding females recorded on site.
- **Water impacts:** This project could cause groundwater drawdown up to and exceeding 2–6m for up to 25 years post mining. This puts Moolarben Creek at risk, a vital drought refuge for wildlife.
- **Cultural significance:** Mining would damage Wiradjuri cultural landscapes, including sacred sites.
- **Economics:** There is no justification for this expansion to provide regional jobs. There have been vacancies at the three Mudgee region coal mines for many years. Additionally, The Moolarben Mine is within the Central West

¹Moolarben OC3 Air Quality and GHG Addendum Report -

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=S SD-33083358%2120240315T015232.056%20GMT>

Total Scope 1 = 0.49

Total Scope 2 = 0.05

Total Scope 3 = 64.06

Orana Renewable Energy Zone where the NSW Government is focusing on fast-tracking renewable energy and providing jobs in this industry.

- o 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 slow forecasted decline of Australian thermal coal demand from China and South Korea especially - the economic argument could be even weaker than Yancoal has outlined in the May 2025 Resource Assessment.²

Key Points

1. **No amount of biodiversity offsets can replace the existing environment. Yancoal is proposing to clear 113ha of woodland.** All of the bush they will clear is koala habitat and [koalas are recorded on site, including in the middle of one of the proposed pits](#) and breeding is occurring in the area.
2. **The nature and biodiversity impacts of the proposed expansion are unacceptable.** The expansion is likely to result in serious and irreversible impacts (SAIL) on threatened fauna and ecological communities, including Regent Honey-eater, Broad-headed Snake, Microbats (eastern cave and large-eared pied bats), and White Box-Yellow Box-Blakely's Red Gum Grassy Box Woodland and Derived Native Grassland (loss of 493.12 Ha).
3. [Noise and blasting impacts on Munghorn Gap Nature Reserve \(MGNR\) were poorly assessed and not included in the modelling report.](#)
4. **The expansion will have impacts on local water sources, and groundwater.**
5. **The NSW government cannot afford to approve any new coal mines and expansions.** This project is clearly inconsistent with the goals of the Paris Agreement and the NSW Government's Climate Change (Net Zero Future) Act 2023. NSW is not on track to meet GHG targets: on 23 April 2024, the NSW Minister for Climate Change advised that NSW is not on track to meet legislated climate targets for 2030 and 2035. With abatement "as currently tracking", the NSW government projects that NSW will achieve only a 44% reduction by 2030 and 65% by 2035. This is well short of both the 50% by 2030 and 70% by 2035 legislated targets.

NSW in top 5% of states most at risk from climate change globally: The Climate Risk Group - in their [submission](#) to the NSW Parliament's Climate Change (Net Zero Future) Bill 2023 inquiry - warned that NSW is in the top 5% of states most at risk from extreme weather and climate change globally.

Given: a) that NSW is not on track to meet GHG targets; b) that NSW is highly vulnerable to the impacts of climate change; c) that approval of Moolarben is not in the public interest and not aligned with Paris Agreement goals or the principles of the Climate Change (Net Zero Future) Act 2023, the project should be rejected.

6. The expansion will harm the local community in the Mid-Western region by contributing to climate impacts felt locally.

The Moolarben OC3 expansion would worsen climate change impacts already being experienced by the local community. In the Mid-Western Region, climate change is intensifying heatwaves, prolonging drought conditions and increasing the risk of extreme weather events, all of which affect community health, water availability, agricultural livelihoods and day-to-day liveability.