

My name is Lydia Fagan. I'm a teacher and a PhD student at the University of Sydney and I grew up in Canowindra in Central West NSW, on Wiradjuri Country. I know firsthand how beautiful the lands in this region are and how vital it is to keep our preserved native lands protected.

Yancoal's expansion proposal would clear around 480 hectares of native vegetation, which is increasingly scarce. It will also push mining to within 100 metres of the reserve, endangering a highly biodiverse area, with at least 23 threatened species. This reserve was created to recognise the importance of protecting our native ecosystems and placing an open cut coal mine so close to it will be a major disturbance. This should be *protected* land, not a coal mine that delivers no new jobs to the region.

Yancoal's proposed expansion relies on the idea that the irreversible damage to nature can be offset, but this would destroy 113 hectares of koala habitat where breeding koalas have been recorded, including *in the middle* of one of the proposed mine pits. With so much koala habitat already destroyed by bushfires, this land needs to be protected, not demolished and offset. It would also 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. Given their unwillingness in the past to follow their requirements for caring for the land, we must be sceptical of their proposal. This incredibly rich valley should never be up for mining and should be incorporated into the Munghorn Gap Nature Reserve.

NSW and Australia have climate goals which this expansion will directly set us against. 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 which are 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.

The proposed expansion will not contribute to employment nor benefits for the local community, given that the current mine will operate until 2038 without this expansion and coal jobs have remained unfilled for years in the region. Not only does the region not need the coal jobs this expansion would provide, Mudgee is in 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. This is the perfect place to stop further coal mining in line with our climate goals, because those impact by its closure (in over a decade) will have abundant alternative employment options.

There is little economic justification for the destruction of these vital habitats. 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.

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.

Beyond the many environmental impacts, Yancoal's proposal will destroy 55 irreplaceable Aboriginal cultural artefacts, and potentially impact dozens of others. The Registered Aboriginal Parties consulted on the proposal have indicated that these all have high cultural value and deserve to be protected for future generations, as they have been for hundreds of past generations. 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.

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.

We must not allow our vital cultural heritage and fragile ecosystems to be further destroyed in the name of an industry with limited local or national benefits that will continue to leave our climate goals impossibilities. This expansion will cause irreparable damage that can never be offset. The land should be protected for all of our futures, including those working at the coal mine, who are well positioned to transition to renewable energy instead of remaining dependent on a dying industry.