

**Submission: Moolarben OC3 Coal Mine Extension Project, Project Number SSD-33083358.**

We write this submission on behalf of the Sydney Knitting Nannas and friends who are a group of older citizens who wish to engage in whatever democratic avenues are available to us to advocate for good guardianship of the land, air and water for future generations.[1] We are connected to other Knitting Nanna groups, both rural and urban, across the state including in the Mudgee area.

A large group of Sydney Knitting Nannas and Hunter Knitting Nannas have visited the Mudgee area and witnessed both the beauty of Munghorn Nature Reserve and its surrounds, and the devastation of the natural landscape caused by the voids resulting from huge open cut mines.

We strongly object to any approval of the proposed Moolarben Open Cut 3 expansion. The current approval is to 2038 and given the rapidly changing landscape as a consequence of climate change [2], there can be no justification for approvals such as this one, beyond 2038.

**The proposal's amendment**

Yancoal's proposed amendment, which has delayed community consultation, does not reduce the proposed mine's footprint or limit its destruction and their offer to manage adjacent areas of its proposed destruction can only be called greenwashing.

The proposed mine would be surrounded on three sides by Munghorn Nature reserve and would be a gaping wound in a piece of nature which is a refuge for wildlife and their unique ecosystems. **This area needs to be incorporated into the reserve**, one of Australia's oldest reserves, rather than having the reserve subject to 24/7 industrial blasting and dust on three of its borders. An arial view of the map shows clearly how the proposal cuts into the shape of the park and runs adjacent to its long and curved perimeter.

**No approval of any expansions should happen without an in-depth review of the cumulative impacts of mining developments in this area.**

The argument to incorporate the valley into the existing reserve rather than creating massive stress to the reserve, takes into consideration the huge loss of nature created by the three major mines in the area (Ulan, Moolarben and Wilpinjong Coal Mines). Their total footprint is 190 square kilometres: 70 km<sup>2</sup> above ground, 120km<sup>2</sup> below ground.[3] 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.

No assessment has been made of the three mines' cumulative impacts on the natural environment, including:

- massive impact on the hydrology of the local area through using megalitres of water and releasing contaminated saline water (4)
- huge losses to endangered flora and fauna habitat

### **Habitat destruction cannot be justified or compensated by biodiversity offset**

This proposal includes clearing 113 hectares of koala habitat (one mother and joey sighted right in the middle of a proposed pit): 80 hectares of Regent Honeyeater habitat where breeding pairs have been sighted (only 250-350 breeding pairs in existence); and up to 401 hectares of the nationally endangered Box Gum Woodland ecosystem. These impacts as well as those on the endangered microbats and the Broadheaded Snake are assessed to be so severe that the NSW Environment Department has recommended a 500 metre buffer to protect the reserve. The chance of mine blasting destabilising the bat's roosting and breeding cliffs in Munghorn is too great. Given the bigger picture of large-scale destruction of habitat and ecosystems of the three mines, the only appropriate action is to refuse this proposal and to instead incorporate the whole proposed mine expansion area as reserve. This flora and fauna are too close to extinction to have some of their last remaining habitat, critical to their survival, destroyed. They may even get the chance to recover if the reserve, as we recommend, is expanded and saved from the proposed blasting, noise, coal dust and massive void. There is no way biodiversity offsets could compensate for loss of such a unique landscape.

### **Climate impacts are inconsistent with Net Zero Commission's findings and climate change**

This proposal is in contradiction of NSW Government's Climate Change Act and therefore must not be approved. The electorate of NSW has been assured that NSW will meet its obligations, yet that will be impossible if business as usual approvals of massive coal mine expansions are allowed.

This proposal does not make any reference to the Net Zero Commission's [Coal Mine Emissions Spotlight Report](#) Finding 4, which states that:

*“Continued extensions or expansions to coal mining in NSW are not consistent with the emissions reduction targets in the Climate Change Act or the Paris Agreement temperature goals it gives effect to”.*

The NSW Government is not on track to achieve either the 2030 or 2035 emissions reduction targets, which it has promised its electorate. Consequently, there can be no justification to approve an estimated 64.6Mt of total lifecycle greenhouse gas emissions.

### **Scope 3 emissions must be considered**

The failure of the proposal to include the consideration of the Denman case is grounds to reject the proposal. There has been no attempt to quantify the full economic costs of Scope 3 downstream emissions in Australia and in the local area, even though Scope 3 emissions make up 99% of all emissions from the project.

**The Sydney Knitting Nannas were in the Court of Appeal to hear the arguments and the unanimous findings of the three justices of the Denman case.**[5] The appeal was heard in the same week that five people in the Hunter Region drowned in unprecedented climate-affected flooding. The decision was handed down on the same day that Advisory Opinion on climate change by the International Court of Justice (ICJ) was announced in the morning news bulletins.[6] Scope 3 emissions can no longer be ignored.

### **Further damaging impacts**

There has been inadequate consideration given to the 5 metre drawdown in the alluvium of Moolarben Creek which feeds into the Goulburn River. The damage to deep-rooted vegetation and the ecosystems it sustains must be given high priority. Importantly, it should be noted that the mine does not have a good history of its water estimates.[7]

There is a huge risk of the blasting destabilising the cliffs. This is a landscape millennia in the making as are the adjacent ecosystems, and if damaged the loss is forever.

### **Harm to the cultural heritage of the Wiradjuri people**

There are 55 Aboriginal heritage sites within the footprint of the proposal and there are dozens more which may be indirectly affected. It is unacceptable that further fracturing of the landscape would be allowed without full consideration of the right to practice culture on country. As indicated before, the cumulative degradation of land from open cut and underground mining in the local area must be considered. Even the cumulative loss from just the current and proposed Moolarben mine is unacceptably high. Respecting the rights of the traditional owners should be the first consideration and the proposal must be rejected.

### **The declaration of a renewable energy zone**

This proposal cannot be justified by the need for employment as Mudgee is part of the Central West Renewable Energy Zone. There is a shortage of workers for this forward-looking industry, and it is being welcomed by the local community who have endured 24/7 industrial noise, blasting, dust, and air/water/land pollution and the loss of the natural landscape caused by the mines.

**We, the Sydney Knitting Nannas strongly object to the Moolarben OC3 Coal Mine Extension Project, Project Number SSD-33083358.**

[1] <https://knittingnannas.org/sydney/>

[2] <https://www.theguardian.com/environment/2026/feb/05/flawed-economic-models-mean-climate-crisis-could-crash-global-economy-experts-warn>

[3] <https://www.ipcn.nsw.gov.au/sites/default/files/pac/projects/2018/10/bylong-coal-project/presentations-and-comments/cumulative-impacts-goulburn-river-final-nov-2018.pdf>

[4] (Extract from [3]. The estimated total water intercepted and extracted in the relatively dry year of 2014, as reported in the three mine water balances (Ulan, Moolarben and Wilpinjong Coal Mines) was in excess of 8,500 ML/year (UCML, 2014; MCC, 2014; WilpinjongCoal, 2015a). During 2014 the cumulative mine water usage was around 4,000 ML/year. This equates to about one third of the total annual flow in the Goulburn River as measured at the downstream Coggan stream gauge over the same period (11,951 ML/year at GS210006).

[5] <https://www.johnsonlegal.au/newsfeed/denman-aberdeen-muswellbrook-scone-healthy-environment-group-v-mach-energy-and-independent-planning-commission>

[6] <https://envirojustice.org.au/what-the-icj-ruling-means-for-australias-environment-laws/>

[7] Extract from [3]. In 2015 Moolarben Coal Mine modelling predicted groundwater inflows to their Underground One mine (UG1) to be less than 1ML/day peaking at around 1.5 ML/day (MCC, 2015). When underground mining commenced in 2017, the actual water make in the first 6 months exceeded 5 ML/day<sup>10</sup> Groundwater modelling was subsequently amended and recalibrated to capture the significant unpredicted mine inflows which increased to over 6 ML/day in 2018. The adjusted modelling now predicts a maximum peaking at 17.27 ML/day in 2025 (MCC, 2017b). This represents a more than 10 fold increase in the maximum water make than originally predicted and a significant increase in interference to the groundwater system by the Moolarben Coal Mine.