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Independent Planning Commission

Submitted online

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Submission Against the Moolarben Coal Complex OC3 Extension Project (SSD-33083358)

Status: OPPOSE

Introduction

Healthy Rivers Dubbo (HRD) is a community-based organisation dedicated to the protection and restoration of rivers, wetlands, and aquifers within the Murray-Darling Basin. We advocate for the health of our waterways for the benefit of the environment and the communities that depend on them. We pay our respects to the Wiradjuri people, the Traditional Owners of the land on which this project is proposed and acknowledge that sovereignty was never ceded.

HRD writes to express its strong objection to the Moolarben Coal Complex OC3 Extension Project. This submission will demonstrate that the project poses an unacceptable risk to the Goulburn River, a significant coastal river system that supports important ecological communities and provides critical habitat for threatened species[1].

An approval of this project would be inconsistent with the principles of ecologically sustainable development and environmental protection.

[1] NSW National Parks and Wildlife Service. Goulburn River National Park. https://www.nationalparks.nsw.gov.au/visit-a-park/parks/goulburn-river-national-park

Critical Threats to the Goulburn River

The Moolarben mine expansion is located in the headwaters of the Goulburn River, a river system of significant ecological and cultural importance. The Goulburn River National Park, which stretches over 90 kilometres along the river near Mudgee, protects important riparian and floodplain vegetation, wetlands of state significance, and habitat for vulnerable and threatened species.

The proposed extension will cause significant groundwater drawdown, estimated at 2 to 6 metres for up to 25 years post-mining, threatening the viability of Moolarben Creek, a vital drought refuge for wildlife. This represents a substantial reduction in water availability during critical periods when the river's flow is essential for maintaining aquatic habitat and supporting dependent ecosystems.

The water quality and quantity of the Goulburn River directly influences the health of the broader Hunter River system, making the integrity of the Goulburn's headwaters and tributaries including Moolarben Creek, critical to the ecological function of the entire catchment.

The Hunter River system ultimately discharges into the Hunter Estuary Wetlands, a Ramsar-listed site of international significance located on the northern edge of Newcastle. These estuary wetlands, first listed under the Ramsar Convention in 1984, support 112 species of waterbirds and 45 species of migratory birds listed under international agreements, including threatened species such as the Australasian bittern, green and golden bell frog, and estuary stingray. The wetlands provide critical habitat for species at vulnerable life stages and serve as vital refuge for waterbirds during periods of inland drought[2].

Any degradation of water quality or reduction in freshwater flows in the Goulburn River, such as that caused by mining operations in its headwaters, directly threatens the ecological character of these internationally significant wetlands. The cumulative impacts of mining-related water loss and contamination in the Goulburn River headwaters therefore represent a threat not only to the local river system but to the entire Hunter River estuary ecosystem and the migratory bird species that depend on it.

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[2] NSW Environment and Heritage. Hunter Estuary Wetlands. https://www.environment.nsw.gov.au/topics/water/wetlands/internationally-significant-wetlands/hunter-estuary-wetlands

Cumulative and Irreversible Impacts

The Moolarben complex is one of several coal mines operating in the headwaters of the Goulburn River. The cumulative impact of mining operations in this area has already caused significant environmental damage. Mining de-watering and discharge have increased salinity levels in the Goulburn River, with mine water affecting water quality over substantial downstream distances[3]. **The estimated combined total water being removed from the groundwater system due to mining operations in the upper Goulburn ranges between 30 and 65 million litres annually[4].**

Approving this extension would exacerbate these existing problems, further degrading the health of the Goulburn River and placing its dependent ecosystems at greater risk. The impacts of groundwater drawdown are particularly concerning given that they persist for up to 25 years post-mining, meaning damage caused by this project will continue to harm the river system for decades after mining ceases.

The underground mining component of this project poses additional risks. **Longwall mining within close proximity to the Goulburn River gorges risks causing subsidence that could destabilise the fragile sandstone landscape, fracture aquifers, and reverse groundwater flow into mining voids.** These impacts would be irreversible and cannot be adequately remedied once they occur.

Biodiversity and Cultural Heritage Impacts

Beyond the critical water impacts, the project will clear 113 hectares of koala habitat and 80 hectares of Regent Honeyeater habitat known to support breeding populations.

If approved it would also destroy over 493 hectares of the critically endangered White Box-Yellow Box-Blakely's Red Gum Grassy Box Woodland ecological community. These are unacceptable losses that cannot be adequately compensated for through biodiversity offsetting.

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[3] NSW Environmental Protection Authority. (2016). Goulburn River Stone Cottages: Issues Paper. https://www.epa.nsw.gov.au/sites/default/files/2025-02/lbl-issues-paper-goulburn-river-stone-cottages.pdf

[4] Mudgee District Environment Group. Save The Drip. https://mdeg.org.au/focus/save-the-drip/

The project would pose a significant threat to the cultural heritage of the Wiradjuri people. The Goulburn River gorges, including the iconic natural feature known as The Drip, are significant places for the Wiradjuri people and contain sacred sites and cultural landmarks. Mining operations in this area risk damaging these irreplaceable cultural assets.

Climate Change Inconsistency

The project is incompatible with the urgent need to address climate change. **The mining of an additional 30 million tonnes of coal will result in approximately 64 million tonnes of greenhouse gas emissions.** This is inconsistent with the objectives of the NSW Climate Change (Net Zero Future) Act 2023 and Australia's commitments under the Paris Agreement. With NSW already not on track to meet its legislated 2030 and 2035 emissions reduction targets, the approval of a new coal extension is indefensible.

Conclusion

The Goulburn River is a river system of significant ecological, cultural, and recreational importance. The Moolarben OC3 Extension Project, with its substantial impacts on water quantity and quality, poses a direct and cumulative threat to this important river system. The project's impacts on water, biodiversity, cultural heritage, and the climate are unacceptable.

Healthy Rivers Dubbo urges the Independent Planning Commission to act in the public interest, uphold the principles of ecologically sustainable development, and refuse the Moolarben Coal Complex OC3 Extension Project.

Thank you for the opportunity to comment.

Yours sincerely,

Melissa Gray

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