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Submission of Objection
Ulan Mod 6 Amendment 2 (SSD MP08_0184-Mod-6)

Introduction

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

IRN lodged an objection to the initial Ulan Mod 6 project that was approved on 22 May 2025 by the Minister’s delegate, Chris Ritchie, Acting Executive Director, Energy, Resource and Industry Assessment. This decision was overturned by the NSW Land and Environment Court on 14 November 2025.

IRN also lodged an objection to the proposed Mod 8 – Ulan West Continued Operations on public exhibition from 21 October 2025 to 18 November 2025.

Our key objections relate to the impacts of the current operations and proposed mine expansion on the headwaters of the Murray-Darling Basin. Further pressure on these stressed surface and ground water sources over a period of time well beyond mining activity cannot be justified.

The key points of objection previously submitted to the Mod 6 proposal were not addressed in the Notice of Decision released with the initial determination in May 2025.

The Amendment 2 documents do not further assess impacts on water sources and do not assess the cumulative impact with respect to the proposed Mod 8 expansion.

Issues with adequacy of water source impact assessment

IRN submissions to both the original Mod 6 and Mod 8 assessment reports identified a significant number of issues with water management on the Ulan Mine. These issues have not been addressed:

- Persistent under-estimation of water interception
- Poor water modelling process

- Failure to adequately assess cumulative impacts on surface and groundwater sources with each expansion since the original mining operations were approved.
- Cumulative impacts on base flows to the Talbragar River that have important ecological value

IRN does not support that the assessment meets the objects of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) s 1.3 (d) or the requirements of s 4.15(1)(b) to consider the significant likely environmental impacts. The assessment also fails to adopt the principles of Ecologically Sustainable Development (ESD) including the precautionary principle, intergenerational equity and conservation of biological diversity and ecological integrity.

The proposed drawdown of baseflow to the Talbragar River for over 100 years fails to meet any of the requirements of the EP&A Act. This is particularly likely to be a significant impact under the predictions of climate change impact scenarios for the region.¹

The the NSW and Australian Regional Climate Modelling (NARCLiM) project snapshot for Central West Orana Region predicts continuing rainfall variability across the region, including:

- decreases in annual average rainfall of between 9.3% (SSP1-2.6) and 15.7% (SSP3-7.0) by 2050, to between 424 mm and 394 mm, down from 467 mm per annum.
- decreases in average summer rainfall of between 8.4% (SSP1-2.6) and 19.4% (SSP3-7.0)
- decreases in average winter rainfall of between 7.0% (SSP1-2.6) and 15.5% (SSP3-7.0).

These climate impacts combined with cumulative loss of baseflow to the Talbragar River catchment over a longer period of time than to 2050 is significant and has not been assessed.

The Talbragar River is an important tributary to the Macquarie River because it provides natural flows below the influence of Burrendong Dam and feed directly into the Macquarie Marshes. These internationally significant wetlands have recently been listed as endangered. Any long term loss of flows, particularly during prolonged drought, will impact on the viability and resilience of this important wetland within the Murray-Darling Basin.

Cumulative Impact with Ulan Mod 8

The Mod 6 amendment 2 assessment fails to assess the cumulative impact of the proposed Mod 8 expansion on water sources in the region. The two mine expansions are linked and must be assessed together, along with the impacts of current approved operations on the hydrology of a very large area that straddles the Great Dividing Range.

Together the two expansion proposals will disturb approximately 2,368 ha of landscape through subsidence impacts with significant disruption and damage to groundwater sources.

The Cumulative Impact Assessment (CIA) Guidelines for State Significant Development 2022 require that a project-level CIA builds upon the baseline information to factor in the potential impacts of the proposed project, along with other future projects and their potential for compounding those impacts.²

¹ Umwelt. November 2025. Amendment Report p 57/58

² CIA Guidelines p 6

The documents on exhibition for the Mod 6 Amendment 2 proposal fail to assess the cumulative impact on water sources of the proposed Mod 8 proposal.

Conclusion

This proposal must be rejected because:

- It fails to meet the key principles of ESD, particularly the precautionary principle, intergenerational equity and conservation of biological diversity and ecological integrity.
- The assessment of impacts on water sources, including cumulative impacts has not been addressed.
- The poor water modelling to predict loss of base flows cannot be relied upon
- The loss of baseflow to the Talbragar River over a long period of time is unacceptable.
- The cumulative environmental, social and economic costs of the greenhouse gas emissions from the two connected Mod 6 and Mod 8 proposals has not been adequately assessed in terms of social and economic impacts on the locality.

For more information about this submission contact:

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