



environmentally concerned citizens of orange
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25 January 2026

To Whom It May Concern

Re: Ulan Coal Mine Amended Modification 6

Dear Sir/Madam

I am writing to you on behalf of the Environmentally Concerned Citizens of Orange (ECCO). We are a local not for profit environmental organisation established in 2006. One of our objectives is to be a strong advocate for climate change adaptation and mitigation, including supporting a rapid transition away from coal. Because of this, we strongly oppose the Ulan Coal Mine Amended Modification 6. We do so because of the negative impacts of the project on the natural and social environment, as detailed below.

The amended modification will increase greenhouse gas emissions. It is estimated that, should the project proceed, it will produce an additional 18.8 million tonnes of coal. Add this to the estimated 43 million tonnes of coal which will be produced by Mod 8, and there will be 45% increase (or more) in total emissions above current approved operations at Ulan mine. The proposal lacks compliance with the NSW EP&A Act, as it fails to assess the social and environmental impacts of all greenhouse gas emissions, including Scope 3 emissions. Regardless of any assessment, it is obvious that the potential huge increase in greenhouse gas emissions is unacceptable, and flies in the face of any ambition or strategy to reach greenhouse gas targets at either State or Federal level.

Ulan Mod 6 will have serious environmental impacts. The site proposed for the Mod 6 will have a serious impact on threatened species habitat. Large-eared Pied Bat, Eastern Cave Bat, Powerful Owl, Barking Owl and Southern Myotis are threatened species, the habitat of which will be impacted by the proposed Mod 6. As well as being subject to direct threat, these threatened species are subject to the cumulative effect of other local mining operations, which includes Moolarben Open Cut 3. These cumulative effects have not been adequately assessed, nor has the impact of the cumulative loss of critically endangered Grassy Box Woodland. This assault on our threatened native species is unacceptable, given that Australia is currently in the grip of an extinction crisis. The area in question should be designated as a “no go” area under the new Federal Nature laws legislated in 2025.

The proposal will impact water sources. Underground water sources store water in the landscape and make a significant contribution towards water required for both human consumption and the environment. Groundwater also augments flows to rivers and creeks. Mining activities and associated subsidence can cause significant interference to groundwater sources and flows.

Ulan Mod 6 combined with Ulan Mod 8 will cause significant loss of flow to the Talbragar River, which is an important tributary of the Macquarie River which feeds the Macquarie Marshes and the Murray Darling Basin.

Employment is not a justification for the proposal. Mod 6 is situated within the Central West Orana Renewable Energy Zone where there are current labour shortages. Mining competes with renewable energy industries, as well as housing and construction, for the skilled labour that is available. As such, the argument that Mod 6 is required for local employment lacks validity. Future demand for skilled employees as a result of Mod 6 is likely to slow the much-needed transition to renewables. A clean energy future for the region will enhance the potential for sustainable economic development, and prioritising this transition is supported by the Central West Future Jobs and Investment Authority. Further fossil fuel expansion puts all this at risk.

Conclusion. ECCO strongly argues that there is no justification for Ulan Mod 6. The project would make a massive and unnecessary contribution to the alarming climate change scenario that we already face. It would also significantly impact on the local environment, identified threatened species and groundwater in the region. Mod 6 stands in the way of a transition to a renewable energy economy for the area, well as slowing the process of moving the Mudgee district to a more diverse and sustainable economy. Instead of contemplating such destructive future projects, we should be doing all we can to protect and preserve our natural habitat and water resources, as well as creating a sustainable economic future.

Yours faithfully

Stephen Nugent
President
Environmentally Concerned Citizens of Orange (ECCO)