

Submission on Ulan Coal Modification 6 – Application Number MP08_0184-Mod-6
Underground Extension Amended Development proposal

27 January 2026

I object to the Ulan Coal Mine (UCML) Amended Modification 6 proposed development. This proposal would extend the life of the Mine to 2035 as well as facilitate the proposed Modification 8 - further extending mining to 2041. The two proposed expansions cover 2,368 hectares and will destroy or degrade irreplaceable surface and groundwater resources, extending and intensifying ongoing approved environmental damage to the surface water catchment and groundwater system flowing to the Talbragar River (Murray Darling Basin) and Goulburn River (Hunter catchment).

Both these 'modification' proposals should be rejected or at least assessed as a new project. Mod 6 partially and Mod 8 wholly are on land covered by an Exploration Licence, not the original mining lease seeking to be modified. Substantially they are not the same as approved mine and mining lease. Mod 6 is physically linked to Mod 8; they are a new mine and should be assessed jointly with independent expert scrutiny and a full merit assessment that includes the cumulative impact of Mod 8. This may allow decision makers a more accurate basis to evaluate cost/benefit while promoting situational awareness of the actual impacts on water, climate and the local community.

Coal mining companies putting up a smaller project and then on approval applying for endless modifications (expansions) repeatedly has occurred since the 1980's in the Ulan/Wollar area. This is a cynical manipulation of the planning system, a project-by-project narrow focus allowing cumulative (i.e. real) impacts to be minimised or left out entirely from cost/benefit analysis and of course generational costs expected to be borne by the community and the Goulburn/Talbragar River catchment environments. If our Ulan/Wollar area is to have any hope for a future beyond the more than forty years endured so far of destructive ever-expanding coal mining I appeal to decision makers to leave something left of this country, to demonstrate that the Planning system can work for the community by not to allowing such gaming of the system to be rewarded.

Continuing the expansion of coal mining is not going to provide any net increase in regional jobs. Ulan Coal Mine falls within the Central West Orana Renewable Energy Zone where there is a workforce shortage for renewable energy projects and other industries. Nor is job security dependent on Mod 6 or Mod 8 expansion. Regardless of the outcome for Mod 6, the Glencore Ulan Coal Mine has approval to mine 20 Mt/year of thermal coal into the future until at least August 2033. The three coal mines already have been given multiple expansions/modifications put forward over the last 40 years, riding over the wishes of downstream landowners such as myself, First Nations people and local communities. All while visibly degrading our riverine environment and dismantling our communities (schools, volunteer organisations and alternative economic opportunities). This has been despite the 'safety net' of multiple conditions of approval, conditions that have proven largely ineffective in preventing that decline.

Multiple new expansion applications to mine coal until 2040 and beyond are clear indications that despite repeated evidential confirmation worldwide of the dire warnings coal companies intend to keep on mining our coal and water. They will continue wanting more, until forced to stop by catastrophic economic and environmental shifts. In the amended report for Mod 6 on page 57, they say that local effects are not a problem when Mod 6 local emissions are viewed in comparison to global and national emissions. This is the latest iteration on an old theme where the coal industry and their consultants essentially are saying that if they are required to act now on reducing emissions, 'this is inequitable unless we can go last'. Whatever uncertainties there may remain concerning our (bleak) future prospects, no longer can there be any doubt that all emissions contribute to global and national emissions. Locally and globally, we face an existential threat due to carbon pollution. For there to be any hope, as minimal first steps there must be urgent action to stop approving coal mining expansions and the clearing/degradation of intact forest.

The amended report does not fully identify the impact of Climate Change from the mining and burning of an additional 18.8 million tonnes of coal (43 MT when combined with Mod 8) on the local environment and community, as required under NSW Planning laws. The existential threat of climate change no longer is a theoretical prediction: for all sensible people time for debate is over and the need for urgent meaningful action long overdue. Given this alarming existential threat to all life now identified as substantially caused by

mining and burning coal (and far worse than expected due to their poor monitoring and under-reporting of methane emissions) known costs of further coal expansion are escalating and cannot in any way be offset. Approving new coal mining expansions such as this, so we can continue exporting subsidised thermal coal to Asia beyond the 2030's and into the 2040's, is acting against all evidence and will be viewed as a hostile act by future generations and our neighbours. On the grounds of carbon pollution alone, a binding mine closure plan is needed urgently.

Since the 1980s UCMLW operations, followed by Wilpinjong CM and Moolarben CM in the early 2000s have dewatered the landscape to conduct their mining operations, spreading over a pre-mining watershed that formerly supported numerous springs and seeps critical in dry periods. These features are not only culturally and socially significant, for life to survive they are the heart of this country. In the same time frame, this dewatering of the landscape due to open cut and longwall mining has increased in tandem with the well documented increases in fire danger conditions, both are increasing into the future as we do nothing effective to curtail our emissions. This is unacceptable and highly inequitable for future generations.

Mining Mod 6 and Mod 8 will exceed 2000 hectares of permanently dewatered country to the west of where I live, adding to cumulative damage of open-cut and longwall mining across the upper Goulburn catchment currently covering more than 250 square kilometres where water run-off has been distorted and groundwater levels lowered (often by tens of metres). The Department of Planning effectively has been approving mining companies here to create a broad scale dried-out more fire-prone landscape. All of this while the carbon pollution released exacerbates climate change enhanced bush fire weather. This proposal for additional underground mining will cause additional loss to the base flows of both East (Goulburn River) and West (Talbragar River) flowing rivers. The cumulative drawdown will be irreversible in any human time frame. The modelling predictions are unreliable and a poor basis to predict the long-term consequences of mining and the potential for any 'recovery' of useful water resources in this area. Speaking from more than 30 years' experience as an active volunteer firefighter and as a local landowner, the consequences from dewatering this landscape combined with the local effects of carbon pollution will leave an unjust legacy to the local community. There is a strong risk this land will be

rendered uninhabitable. Ironically this will also make coal mining and rail transport of the coal product increasingly unreliable and less profitable due to local effects of climate change. None of these serious limitations are covered in the expansion documents.

Ulan Mine crosses under the Great Dividing Range intercepting water from the Murray-Darling Basin as well as the Hunter catchment, an underground longwall mining operation disturbing over 120 km² of farmland and bushland with high biodiversity values. Extending mining also extends the time and amount of water releases into Goulburn River. This will extend and add to the staggering amount of salt load¹ discharged into the Goulburn/Hunter Rivers while continuing to mask the scale and effects of the dewatering that has been going on since the 1980's. There is also loss of flows to the Talbragar River, tributary of Macquarie River feeding into significant Macquarie Marshes.

This mining expansion will increase social impacts with loss of farm water and ongoing disturbance and degradation of our rural way of life. Added to this is the loss of Aboriginal cultural heritage and spiritual landscape for Wiradjuri Nation. Also, it appears that Mod 6, with its dependant Mod 8, will impact at least 17 private properties by subsidence, four houses and fourteen private bores affected. The only way this could be seen as acceptable is if local residents and First Nations peoples' life, values and pain over loss are deemed as lesser in importance than those profiting from continued mining expansions and as well seeing the biodiversity on which all life depends as of no value compared to digging up all possible coal until forced to stop.

Yours sincerely

Colin Imrie

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¹ 2024 Annual Review Ulan Coal Mine – Table 7.1 - 6,153 million litres water containing @ 585mg/L salt (EC discharged into Goulburn River ~ **10 tonnes salt per day** (or 3,600 tonnes salt/year)