



Nature Conservation Council

The voice for nature in NSW

Tuesday 27th January 2026

Submission to the Department of Planning and Environment RE: MP08_0184-Mod-6 – Ulan Coal Mine Expansion Modification 6

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 200 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC objects to Modification 6 - underground mining extension. We are concerned about the ongoing environmental degradation to the area. Although presented as a minor change, the proposal would further extend coal extraction in a landscape already under significant pressure and risk to water resources, biodiversity and the climate. These impacts have not been adequately assessed, particularly when considered alongside cumulative impacts of mining in the region.

Failure to assess cumulative impacts

Amended Modification 6 cannot be considered in isolation. The assessment fails to acknowledge that Modification 8 cannot proceed without approval of Modification 6. It extends the operational life of the mine and directly enables future expansion proposals, including Modification 8. Assessing these changes as incremental modifications avoids a proper evaluation of cumulative impacts on water systems, biodiversity, climate emissions and cultural heritage. It also limits proper independent scrutiny of environmental impacts.

Climate Change Impacts Not Assessed

Extending the life of a thermal coal mine is fundamentally inconsistent with the urgent need to reduce greenhouse gas emissions. We note the proponent has superficially calculated the greenhouse gas emissions. However, the proposal does not meaningfully assess total emissions, including downstream Scope 3 emissions and their contribution to climate change impacts. There is no publicly reported data on methane emissions or plan to reduce fugitive methane emissions. Further, there is no evidence of additional community consultation around the local climate change



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impacts this project would contribute to. Approving this modification would lock in avoidable climate pollution at a time when rapid transition is essential.

Unacceptable risks to water resources

Underground coal mining is known to cause subsidence and long-term disruption to groundwater systems. The Ulan mine operates within the Murray–Darling Basin, where water resources are already under significant stress. This expansion faces further loss of flow to the Talbragar River in particular. This impact flows onto the Macquarie river systems and, ultimately, the Macquarie Marshes.

The Ramsar listed Macquarie Marshes, known to the Wayilwan people as Wammerawa, are an ecologically vital wetland system in the heart of central west New South Wales. As one of the largest remaining inland semi-permanent wetlands in the Murray-Darling Basin, the Marshes are a vibrant tapestry of life, encompassing extensive river red gum woodlands, common reed, and water couch marshes. They provide a crucial sanctuary for a diversity of wildlife, supporting over 250,000 breeding waterbirds in times of major floods. The Marshes are a critical breeding ground for 16 species of colonial nesting waterbirds, and serves as an essential destination for migratory birds. The recent listing of the wetlands and inner floodplains of the Macquarie Marshes as an Endangered Ecological Community under the EPBC Act underscores both their immense importance and is a defence against projects such as this extension that would cause more harm to the Marshes from altered water flows.

Impacts on Biodiversity and Threatened Species

The proposal would contribute to ongoing habitat degradation in a region that supports threatened species and endangered ecological communities, including remnants of Box Gum Woodland. Offset-based approaches cannot substitute for avoiding further damage in an already fragmented landscape.

Aboriginal Cultural Heritage at Risk

The Ulan area is part of Wiradjuri Country and holds deep cultural significance. Continued mining without a comprehensive, cumulative assessment of cultural heritage impacts risks further loss of values that cannot be replaced or offset. The impacts to Country and Cultural Heritage have been woefully underassessed by all mining in the region. This further degradation of cultural heritage must be considered in the wider context of the cumulative impacts of mining, including Ulan Modification 8.

For these reasons, we submit that Amended Modification 6 should be refused. At a minimum, it should be assessed together with related proposals as a new project,



subject to full environmental, social and cultural assessment. Protecting water, biodiversity, climate and cultural heritage must take precedence over extending coal extraction in an already over-burdened landscape.

Thank you for the opportunity to make a submission. Your contact person at Nature Conservation Council of NSW is Coal Mining and Methane Campaigner, Manjot Kaur (mkaur@nature.org.au).

Yours sincerely,



Jacqui Mumford
CEO of Nature Conversation Council NSW

