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The Secretary
Department of Planning, Industry and Environment
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28 March 2025

DARTBROOK COAL MINE MODIFICATION 8 (DA 231-7-2000 MOD 8)

Godolphin Australia Pty Ltd ("Godolphin") is the largest integrated breeding and racing operation in Australia.

We have seen and fully support the Hunter Thoroughbred Breeders' Association submission. Godolphin objects to the Dartbrook Coal Mine Modification 8.

Godolphin

Godolphin is part of a network of global breeding and racing business, which operates around the world, including Australia's Hunter Valley, Newmarket in the UK, County Kildare in Ireland, Kentucky USA, Hokkaido, Japan and the United Arab Emirates.

Largest Integrated Australian Breeding and Racing Operation.

In Australia, Godolphin employs in the region of 250 people (c.90 in the Hunter Valley) and has 6 main operational sites (3 stud farms and 3 training facilities):

- NSW: 2 farms (Woodlands and Kelvinside in the Hunter Valley) and 2 training facilities (Warwick Farm & Agnes Banks);
- Victoria: 1 farm (Northwood Park) and 1 training facility (Flemington).

Godolphin established its commercial breeding operation in the Hunter Valley in 2001 (trading under the Darley Australia name) in recognition of Australia's growing force in international thoroughbred breeding and racing.

In 2003 we purchased the 1,700-acre Kelvinside Stud in Aberdeen in the Hunter Valley. The property has since been developed into a world-class facility with capacity to stand 17 stallions, comprehensive mare, racehorse spelling and rehabilitation and yearling facilities and

a world class education and training operation.

In 2008 we also purchased Australia's then largest integrated breeding and racing operation, Ingham Bloodstock, which included the 6,000-acre Woodlands Stud at Denman. In addition to its Hunter Valley farms, Godolphin operates a Victorian breeding operation from its stud Northwood Park, at Seymour Victoria, where it stood 7 Stallions for the 2022 Season.

Our Woodlands and Kelvinside properties operate as one integrated operation in the Hunter Valley.

Godolphin owns in excess of 660 horses with over 220 horses in training or racing from its two training bases in Warwick Farm and Agnes Banks (Western Sydney), and a Victorian training base at Flemington racecourse in Melbourne, Victoria.

Godolphin's business model is to "breed to race and race to breed". All of our progeny are bred from the finest thoroughbred bloodlines, building their reputation and credentials on the racetrack, and retired to stud to produce future elite athletes of the turf.

Godolphin employs some 90 employees in the Hunter Valley across its two stud farms. These include horse handlers, bloodstock experts, gardeners, and others working in corporate functions including administration, finance, human resources, IT, and marketing and sales.

Godolphin hosts, in normal circumstances, over 3,000 clients and visitors annually to our stud farms at Kelvinside and Woodlands.

Our business relies on a pristine environment, which is clearly visible to our clients, visitors and tourists.

Continuous Operation Since 1800's

Godolphin's Woodlands operation has a proud uninterrupted history of thoroughbred breeding dating back to the 1800's. The property was settled in 1824 and it is believed that the current homestead was built in 1833.

Woodlands' first recorded association with thoroughbreds dates back to the 1870's under the ownership of H.C. White, who bred and raced thoroughbreds, the most prominent of which was dual Caulfield Cup winner Paris in 1892 and 1893.

The Godolphin Kelvinside property at Aberdeen has a rich and continuous pastoral history since the 1800's. It was carved from the Segenhoe Estate in the late 1800's by John King Fleming who named it Kelvinside after a property in Scotland. The Kelvinside homestead was built in 1898, is one of the iconic historic homesteads of the district and is a classic example of Australian colonial architecture. The building is set on high ground with views of the Hunter and Pages rivers. Kelvinside is Godolphin's main stallion operation, and it is there that in the order of 1000 mares in each season visit each season, in addition to those mares (in similar or greater numbers) travelling to adjacent studs on Rouchel Road, Aberdeen, and the adjoining Segenhoe Valley.

Our Kelvinside and Woodlands properties operate as one integrated operation in the Hunter Valley, meaning there is constant movements between those Studs, through and around Aberdeen.

Dartbrook Coal Mine Modification 8

We concur and support the submission lodged by the Hunter Thoroughbred Breeders' Association.

We support the call for full cumulative impact assessments to be undertaken on the Upper Hunter's air quality and water security impacted by this and other proposed mining operations (new or extensions) in the Upper Hunter so that informed decisions can be made on this and any other mining applications.

In particular, we submit the following:

- Air quality, dust and associated pollution is poor in the Upper Hunter.
- The Dartbrook Modification 8 proposal admits it will result in exceedances to both air and noise pollution. This in turn will exacerbate an already unsustainable situation in this rural area, which has the most polluted postcodes in NSW.
- This situation is further aggravated by inadequate dust mitigation measures.
- Water is the lifeblood of our industry and our operations. For surrounding landholders, water users, and the Hunter's community the risks, including unaccounted for climate change risks, associated with this proposed modification are not acceptable.
- Given the importance of water security to our region's sustainability we reiterate the need for a cumulative assessment of mining impacts (current and proposed) on the Upper Hunter's water resources to be conducted prior to the approval or commencement of any further mining.
- The Proponent erroneously assumes that the proposed six (6) year extension has negligible environmental impacts, has ignored the cumulative impacts of this proposal and the potential prolonged impacts on adjacent landholders and the Equine Critical Industry Cluster.
- This proposal does not align with the Government's guidelines for State significant modification proposals, the principles of Ecologically Sustainable Development and inter-generational equity, the Government's legislated net zero emissions targets, or the Net Zero Commission's guiding principles including considering the economic risks of delaying action to address climate change.
- In our view the inadequacies expressed by the IPC in the Dartbrook Modification 7 findings/determination remain valid.
- The extension to date has already extended the impacts of the mine along with the uncertainties of the community, and on any analysis the Proponent has not advanced the progress of the mine in a timely manner. It is unreasonable to have the community placed in another period of impact, and the continued uncertainty.
- The application through its continual uncertainty, delays, and continued impacts clearly does not accord with Government guidelines, including but not limited to:
 - facilitating improved project planning and design through earlier identification of potential social impacts;
 - informed decision-making by strengthening the quality and relevance of information and analysis provided to the consent authority; and

- facilitating meaningful, respectful and effective community and stakeholder engagement on social impacts.
- We have had no direct approach, consultation or contacts from the Proponent in respect to this Proposal.

The Dartbrook Mine has had a long history of delay and uncertainty, which ought now be halted, over and above what would appear justifiable unresolved and unacceptable environmental impacts and issues. We respectfully submit that the Department refuse this modification application.

Yours sincerely



Ross Cole

Director of Corporate Services