

SUBMISSION: OBJECTION TO ULAN COAL MINE MODIFICATION 8 (ULAN WEST CONTINUED OPERATIONS)

I strongly object to the proposed Ulan Coal Mine Modification 8.

A new project disguised as a modification

This proposal should not be treated as a “modification” at all. It is, by any reasonable reading, a new project. It falls entirely outside the existing mining lease, introduces large new areas of disturbance, and involves major new infrastructure including a 132-hectare tailings dam. To label this a modification is to avoid the full and independent merit assessment that such a project clearly warrants. This approach—similar to that being attempted at the nearby Wilpinjong mine—appears to be part of a growing and deeply troubling pattern of sidestepping proper environmental scrutiny.

The Mod 8 area extends well beyond current approvals, bringing with it new ventilation infrastructure, haul roads, and the disturbance of more than 1,700 hectares of previously unaffected landscape. The proposal seeks to extract another 43 million tonnes of coal through to 2041, long past the current consent period. That cannot sensibly be regarded as a mere continuation of existing operations. The Department should insist on a full Environmental Impact Statement and new development consent process.

Water systems at risk

The mine straddles the Great Dividing Range, intercepting flows that feed both the Hunter and Murray–Darling catchments. The additional mining area is predicted to cause further drawdown of groundwater and the loss of more than 26 million litres of base flow each year to the Talbragar River, a vital tributary of the Macquarie. This water ultimately supports the internationally significant Macquarie Marshes—already under immense stress from over-extraction and climate change.

At the same time, the company proposes to discharge saline water into the Goulburn River for an extra six years, adding roughly 15,000 tonnes of salt downstream to the Hunter system. The cumulative salinity impact from Ulan, Moolarben and Wilpinjong has never been properly assessed. It is unacceptable that yet another expansion is being entertained before those baseline failures are addressed.

A new toxic legacy beside the Goulburn

The planned tailings dam is particularly alarming. The chosen site lies within a rehabilitated open-cut pit beside the Goulburn River—an area that was supposedly stabilised and revegetated. Re-disturbing it for toxic waste storage risks undoing years of rehabilitation effort and threatens seepage of coal-wash contaminants into riverine groundwater. No credible monitoring or containment plan has been provided. To create a new waste-impoundment zone of this size and risk within the Murray–Darling Basin is irresponsible and unnecessary.

Irreplaceable biodiversity loss

The additional disturbance will destroy sandstone escarpments and cliff-line habitats essential for the Large-eared Pied Bat and Eastern Cave Bat, both nationally threatened species whose strongholds already lie within the mining envelope. The cumulative destruction of roosting sites across Ulan, Moolarben and Wilpinjong is beyond any offset capacity. The project would also clear more Box-Gum Woodland, a critically endangered ecological community, and further

fragment habitat for the Regent Honeyeater, Koala, Barking Owl and Powerful Owl. These losses are permanent and cannot be excused offset promises.

Cultural heritage disregarded

The region records continuous occupation by the Wiradjuri people, yet the proposal concedes impacts to at least 71 registered heritage sites, including rock art. Each new excavation compounds an already devastating record of loss. A proper cumulative assessment—respectful of cultural continuity rather than site-by-site paperwork—is long overdue.

Human impacts and uncertainty

Seventeen private properties will be undermined, with four homes directly above longwall panels and six bores expected to lose water entirely. The offer of “replacement water” during operations is no comfort once mining ceases. Ulan’s long history of property buyouts has hollowed out what were once cohesive rural communities. That quiet social erosion is itself an environmental harm, rarely counted but deeply felt.

Adding to concern, the company still cannot specify the final layout of its surface infrastructure. The Department should never have accepted an application so incomplete. Approval of such an indeterminate plan would be reckless.

Greenhouse emissions and misplaced priorities

Mod 8 would enable an additional 105 million tonnes of greenhouse emissions—a staggering burden in the midst of a climate crisis. Glencore’s record on methane reporting is poor, with unexplained changes to baselines that conveniently reduce its offset obligations. Continuing to expand thermal-coal production inside the Central West Orana Renewable Energy Zone is perverse. The region urgently needs its workforce for renewable and construction projects, not more coal extraction.

Conclusion

This proposal extends a fading industry deeper into fragile country, damaging rivers, heritage and communities that have already borne too much. It is not substantially the same as the existing Ulan approval and must not proceed under the guise of a modification. I urge the Department and decision-makers to reject the Mod 8 application and require Glencore to lodge a new, fully assessable project, subject to complete public scrutiny.

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