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Submission of Objection
Mod 8 – Ulan West Continued Operations
MP08_0184-Mod-8

Hunter Environment Lobby Inc.(HEL) is a regional community-based environmental organization that has been active for over 30 years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL does not support the expansion of the coal mining industry in the Mudgee Region because of the cumulative impacts on water sources in the Hunter catchment, ongoing loss of habitat for critically endangered species and ecological communities and the increase in Greenhouse Gas (GHG) emissions at a time when the international community is struggling to contain the social, economic and environmental impacts of worsening climate change.

This submission outlines a number of key reasons for objection:

1. Water impacts on the Goulburn River ecosystem
2. Additional loss of significant irreplaceable habitat
3. The mine expansion should be assessed as a new project
4. Ulan Mod 6 now set aside
5. Continuing coal mining up to 2041 is globally irresponsible.

1. Impacts on Goulburn River

We strongly object to the proposed expansion of the very large Ulan Coal Mine across the headwaters of the Goulburn River, the most westerly rising major tributary of the Hunter River. The ongoing degradation of the Goulburn River catchment through the impacts of three large mining operations intercepting groundwater and baseflows to the river and dependent ecosystems has not been assessed for cumulative impact.

The discharge of mine water into the river has increased the salt load and changed the ecological character of the river. The Goulburn River is a major feature of the Goulburn River National Park. The integrity of the river system will be further threatened by this proposed mine expansion with extraction continuing to 2041.

The Drip is a significant groundwater dependent ecosystem (GDE) and popular regional tourist destination within the Goulburn River National Park. The cumulative regional drawdown of groundwater from consecutive Ulan Mine expansions combined with Moolarben Coal Mine impacts will directly impact water sources supporting The Drip GDE.

1.1 Loss of baseflows

There has been no assessment of the impact of loss of flow to the Goulburn River through longterm predicted drawdown and cracking of Triassic aquifer systems across the headwater catchment. This is a particular concern during the predicted more intensive climate change driven droughts, once mining has stopped. The release of mine water is currently masking this longterm problem. There is no assessment of the changes to river conditions and health once mining and water releases stop.

There was a period of time during the last intensive drought in 2018-2019 when all discharge ceased. The current interception of base flows caused a greater loss of flows in the river than would have occurred naturally and extended the period of no flow, even after rainfall.

The proposal to continue mining through the landscape, wrecking groundwater ecosystems and drawing down base flows has not been assessed in the context of the damage already inflicted by coal mining operations on the Upper Goulburn River catchment.

The loss of base flows has been extensive and will not be ameliorated through the purchase of water licences from across very large areas of associated porous and fractured rock aquifers or from the Hunter Unregulated and Alluvial Water Sharing Plan.

The loss of base flows from previous approvals plus additional interception from this proposed expansion is predicted to be over 140 ML/year. This loss is more pronounced in extended dry times impacting the resilience of water dependent species.

The predictive modelling for each stage of the Ulan Mine expansion has generally proven to underpredict groundwater inflows to the mine and the model is then updated with new calibrated information. The longterm impacts of mining has caused much greater drawdown of groundwater than stated in environmental assessment reports that inform the decision-making process.

The cumulative impact of loss of baseflows from the adjacent Moolarben Mine and downstream Wilpinjong Mine is highly significant and not clearly identified or addressed. The predictive modelling for these projects has also proven to be incorrect and understated once operations commence.

The longterm health of the Goulburn River has not been adequately assessed or protected.

1.2 Increased salt load

The current daily salt load discharged into the Goulburn River from the three mines amounts to approximately 26 tonnes per day.

The discharge from Ulan Mine over the proposed additional six years between 2035 to 2041 will add a potential 30,000 tonnes more of salt to the river system.

The increasing salt load through mine water discharge has implications for the Hunter Salinity Trading Scheme downstream of the confluence of the Goulburn River at Denman.

The issue of increasing salt load in the Goulburn River has not been addressed.

1.3 The Drip GDE

The Ulan Mine Consolidated Consent condition 33 requires that, *“The Applicant **must ensure** that the project has no impact on the water supply to the “Drip”.*

The latest water model is predicting a >10m decline in the piezometer directly above The Drip (PZ29) in the Triassic aquifer and a significant 50m drawdown of deeper Triassic groundwater in the vicinity of the River and The Drip gorge over time.¹

This is an indication that any further interception of groundwater from mining activity will impact on water supply to The Drip and cannot be approved.

1.4 New large tailings dam

The proposal to construct another tailings dam over 132 ha of previously mined land adjacent to the Goulburn River is another reason for the strong objection to this proposed mine expansion.

The issue of leakage of toxic pollution through the associated alluvial aquifer and old river bed has not been assessed. The lack of monitoring of groundwater seepage to the river diversion is a key issue.

There has been no discussion of assessment of alternative sites, with lower risk to groundwater or of monitoring the proposed site next to the river. The disturbance of previously mined and backfilled, revegetated land is a backward step in developing a final mine landform.

Tailings management is an ongoing issue for Ulan Mine. Extending extraction to another 47.5 million tonnes of ROM coal will compound the problem and extend the longterm legacy withing the river catchment.

¹ AGE 8.12 p. 122/312

2. Loss of irreplaceable habitat

The cumulative impact of permanent loss of habitat for species threatened by significant and irreplaceable impacts (SAII), such as the endangered Large-eared Pied Bat and Eastern Cave Bat, across the three mine sites has not been assessed.

The threat of subsidence destabilization to a further 6.5km of rocky escarpments, outcrops and overhangs in this sensitive sandstone landscape cannot be justified. The assessment of these habitats is very poor. The cumulative displacement of microbats through habitat destruction in this regional landscape is a key issue that requires detailed assessment.

The additional loss of the Critically Endangered Box Gum Woodland that provides habitat for the Critically Endangered Regent Honeyeater (both listed as SAI species) has not been assessed for cumulative impact in the region.

3. New project assessment

HEL strongly objects to this large new coalmine expansion being assessed as a modification. It is wholly outside the current mining lease boundary and is a larger expansion both in area and extraction than the Moolarben Open Cut 3 proposal that is being assessed as a new project.

There has been no consistency in the planning assessment and approvals pathways for the three large Mudgee Region coal mines.

This proposed expansion of the Ulan Mine is not substantially the same as the existing approved operations. It impacts an additional 1,734 ha of remote rugged bushland and productive farmland, outside the current mine lease causing additional, cumulative impacts on water sources, threatened species, Aboriginal cultural heritage and private property.

It is critical that this mine expansion is assessed as a new project.

4. Judicial Review of Ulan Mod 6

This expansion proposal is directly connected to Ulan Mod 6 both in the extension of mine life and extension of longwall panels to the north-west of the Ulan West Operations.

HEL understands that the judicial review in the Land and Environment Court has resulted in the Mod 6 approval becoming void. This has immediate implications for the Mod 8 approvals process.

It is mandatory for all fossil fuel projects in NSW to include an assessment of local climate impacts, including environment, social and economic harms caused by climate change to the locality

HEL recommends that this proposal be rejected as unsustainable and unlawful.

5. Increased GHG emissions to 2041

Mod 8 would generate an additional 105Mt CO_{2-e} of Scope 3 emissions which represents an increase of about 44% of downstream GHG emissions for the approved project. This has implications for NSW meeting targets under the Climate Change (Net Zero Future) Act 2023.

Latest reports presented at COP 30 emphasise that no more fossil fuel projects can be approved if a safe climate is to be protected.² The proposal to continue extracting thermal coal until 2041 is irresponsible.

HEL considers that assessment of climate change impacts from this project on the locality has not been undertaken in regard to social, environmental and economic costs.

The Ulan Coal Mine is within the Central West Renewable Energy Zone (REZ) which is a major NSW investment into the reduction of GHG emissions. It is contradictory to approve thermal coal mine expansion within the REZ. Mining is competing with all other major industries for skilled labour. There is a shortfall of labour for renewable energy and housing construction. The jobs argument is not relevant in this region when many mining skills are transferable to other cleaner industries.

Conclusion

HEL objects to the approval of the proposed Mod 8 – Ulan West Continued Operations because the associated Mod 6 approval is not valid. The additional GHG emissions to 2041 are unsustainable and a threat to society. Environmental impacts are too great and have not been rigorously assessed. This proposal should not be determined as a modification but assessed as a new project.

Yours sincerely



Jan Davis
President

² <https://www.theguardian.com/environment/2025/nov/13/world-still-on-track-for-catastrophic-26c-temperature-rise-report-finds>