

Submission Opposing Ulan Coal Mine Modification 8

I am writing to object to **Ulan Coal Mine Modification 8**. Although presented as a routine modification, Mod 8 is a major expansion with serious consequences for climate, water, biodiversity and cultural heritage, and it should not be approved.

A major expansion, not a simple modification

The Mod 8 application seeks permission to mine a **further 43 million tonnes of coal**, extending operations **up to 2041**. This is clearly a substantial new stage of the project. It should not be assessed through the “modification” pathway, which limits public oversight and avoids the level of scrutiny such a large expansion requires.

Located inside the Central West Orana Renewable Energy Zone

Ulan Coal Mine sits inside the **Central West Orana Renewable Energy Zone (CWOREZ)**—a region specifically identified for clean energy development. Expanding coal mining in an REZ directly contradicts the zone’s purpose and undermines NSW’s transition to renewable energy. If the state is serious about decarbonisation, fossil fuel expansion in an REZ should simply not be on the table.

We cannot expand coal and maintain a safe climate

The expansion would add **105 million tonnes of CO₂-e**, a **45% increase** on previously approved emissions. Continued coal expansion is incompatible with maintaining a safe and stable climate. The scientific consensus is clear: to limit climate damage, **there must be no further expansion of coal mining**. Approving Mod 8 would lock in decades of additional emissions during a period when rapid reductions are required.

Risks to two major river catchments

The mine spans both the **Hunter** and **Murray–Darling** basins—two heavily stressed water systems essential for communities, agriculture, and ecosystems. Further mining threatens water quality, groundwater levels and long-term water security. These impacts remain under-assessed and carry unacceptable risks.

Expansion of a risky tailings dam

Mod 8 includes enlarging a toxic **tailings storage facility** located near a river. Any seepage or overflow, especially during extreme rainfall, could contaminate waterways and move pollution downstream into a **national park**. With increasing climate extremes, expanding this facility is risky and irresponsible.

Destruction of important habitat and threatened species

The proposal would clear more than **100 hectares of native vegetation**, including **34 hectares of critically endangered Box-Gum Woodland**. This habitat supports species already under serious pressure, such as the **Regent Honeyeater** and the **Koala**. NSW cannot afford further habitat loss for species already hanging by a thread.

Damage to Aboriginal cultural heritage

The expansion would impact **71 Aboriginal cultural heritage sites** on **Wiradjuri Country**, where an active Native Title claim exists. These sites carry deep cultural significance, and their disturbance or loss is unacceptable. Traditional Owners have not been adequately respected or heard in this process.

A flawed process that avoids proper scrutiny

Assessing this expansion as a “modification” is inappropriate for a project of this scale. It limits public input, reduces transparency, and undermines community trust in the planning system. A full and rigorous assessment is required Mod 8 should not be allowed to bypass that process.

Given the scale of emissions, the risks to water and biodiversity, the impacts on Wiradjuri cultural heritage, and the fact that the mine sits inside a **Renewable Energy Zone**, Mod 8 is not in the public interest. NSW Planning should **reject Ulan Coal Mine Modification 8** without delay and require any future proposals to undergo a full and transparent environmental assessment.

Sincerely,

Kim Michelle Hansen

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16th November 2025