

Objection to Ulan West Continued Operations (UWCO) MOD 8 expansion

Thank you for the opportunity to lodge an objection to Ulan Coal Mine Mod 8 – Ulan West Continued Operations.

The proposed mine expansion should not be assessed as a modification; it falls outside the current mining lease causing new previously unassessed environmental impacts and differs substantially from the current approved mine. This project is an extension of the recently approved UWCO Mod 6, but on 14 November approval for Mod 6 was ruled invalid by the Land and Environment Court. Of these two new mining expansion proposals neither is in the public interest and Mod 8 similarly fails to properly consider effects of climate change.

Currently we are swamped by multiple new coal mining expansions dressed up as modifications. If our Ulan/Wollar area is to have any hope for a future beyond the more than forty years endured so far of destructive ever-expanding coal mining I appeal to decision makers to demonstrate that the Planning system can work for the community by not allowing such gaming of the system to be rewarded. This 'modification' proposal should be rejected or at least assessed as a new project.

Coal mining companies putting up a smaller project and then on approval applying for endless modifications (expansions) repeatedly has occurred since the 1980's in the Ulan/Wollar area. This is a cynical manipulation of the planning system, a project-by-project narrow focus allowing cumulative impacts to be minimised or left out entirely from cost/benefit analysis and of course all generational costs borne by the community and the Goulburn/Talbragar River catchment environments.

Coal mining is an established industry that has operated profitably (for shareholders) over many years in NSW and nationally. Despite this, it seems coal operations can only proceed by receiving significant ongoing public subsidy (Grudoff, M. & Campbell, R., *Fossil Fuel Subsidies in Australia 2025*, Australia Institute March 2025) mainly in the form of discounts on diesel and electricity usage as well as numerous tax write offs. Coal Companies and their supporters' claim of public benefit are not credible; coal mining is an established industry but nevertheless can only carry on with State and Federal Government support not declared in the same document. It is no longer to the public benefit approving taxpayer underwritten high-risk mining expansions.

The continuing expansion of coal mining is not needed to provide regional jobs. Ulan Coal Mine falls within the Central West Orana Renewable Energy Zone where there is a huge workforce shortage for renewable energy projects and other industries. Nor is job security dependent on Mod 8 expansion. Regardless of the outcome for Mod 8, the Glencore Ulan Coal Mine has approval to mine 20 Mt/year of thermal coal for years into the future until at least August 2033. The three coal mines already have been given every expansion they have requested over the last 40 years, riding over the wishes of downstream landowners such as myself, First Nations people or local communities in Ulan and Wollar all while visibly degrading our riverine environment. Multiple new expansion applications to 2040 and beyond are clear indications that despite the dire warnings coal companies intend to keep mining coal and water and keep claiming all kinds of Government support, all while putting-off full rehabilitation. They will continue wanting more, until they are forced to stop by catastrophic economic and environmental shifts.

The Mod 8 application is to mine a further 43 Mt up to 2041, releasing over 105 Mt of additional Greenhouse Gas emissions. We are living in a time where the existential threat of climate change no longer is a theoretical prediction: for all sensible people time for debate is over and the need for urgent meaningful action long overdue. Given this alarming existential threat to all life now identified as substantially caused by mining and burning coal (and far worse than expected due to their poor monitoring and under-reporting of methane emissions) known costs of further coal expansion are escalating and cannot in any way be offset. Approving new coal mining expansions such as this, so we can continue exporting subsidised thermal coal to Asia beyond the 2030's and into the 2040's, is acting against all evidence and will be viewed as a hostile act by future generations and our Pacific neighbours. On the grounds of carbon pollution alone, a binding mine closure plan is needed urgently.

Ulan Mine Complex crosses under the Great Dividing Range intercepting water from the Murray-Darling Basin as well as the Hunter catchment, an underground longwall mining operation disturbing over 120 km² of farmland and bushland with high biodiversity values. Extending mining also extends the time and amount of water releases into Goulburn River. This will extend and add to the (staggering) amount of salt load downstream to the Goulburn/Hunter Rivers while continuing to mask the scale and effects of the dewatering that has been going on since the 1980's. There is also loss of flows to the Talbragar River, tributary of Macquarie River feeding into significant Macquarie Marshes.

Since the 1980's mine environmental assessments for the many modifications and expansions have consistently understated impacts by focusing on the 'incremental differences' and avoiding assessment of the whole, landscape scale impacts and serious consequences over time. These impacts represent a serious long-term dewatering of the landscape over an extended watershed that supported numerous springs and seeps critical in dry periods. These features are culturally and socially significant and for life to survive they are the heart of this country. The modelling predictions are unreliable and a poor basis to predict the long-term consequences of mining and the potential for any 'recovery' of useful water resources in this area. The cumulative outcome from dewatering this landscape will be an unjust legacy left to the community and Governments to manage. These mines are also water mines and each approval for these expanding coal mines essentially sterilises water resources in an ever-widening footprint.

This mining expansion will increase social impacts with loss of farm water and ongoing disturbance and degradation of our rural way of life. Added to this is the loss of Aboriginal cultural heritage and spiritual landscape for Wiradjuri Nation impacting 71 known sites, including rock art. Also, it appears that at least 17 private properties are to be impacted by subsidence, four houses and over fourteen private bores affected. The only way this could be seen as acceptable is if local residents and First Nations peoples' life, values and pain are deemed as lesser in importance than those profiting from continued mining expansions and as well seeing the biodiversity on which all life depends as of no value compared to digging up all possible coal. To quote Kev Carmody in 'Thou Shalt Not Steal'...

*And if you think that's progress
I suggest your reasoning is unsound
for you should have found out long ago
you best leave it in the ground.*

Final layout of surface infrastructure is not yet determined; the mine plan is not finalised. Effectively Mod 8 is asking us to sign a blank cheque. Although what is included, but with an inaccurate poorly defined map is construction of a large new tailings dam area of 132 ha within a revegetated, rehabilitated old open cut pit next to Goulburn River risking leakage of toxic contaminants either in the event of a climate change enhanced weather event or after constant management of groundwater levels ceases post-mining.

This Mod 8 will disturb an additional 1743 ha with sandstone escarpment, caves and overhangs: destroying additional important habitat for the nationally threatened Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater and Koala (one was rescued from the open cut west) critically endangered Box Gum Woodland. Such broad scale removal and undermining of intact native forest and collapse of sandstone escarpments is unacceptable. Also the threatened species are representative shorthand for the myriad of forest creatures also at risk on which all of us depend to maintain the health of this country, pollinate vegetation, control insects and act to reduce wildfire intensity by processing potential fuel in the understory.

Yours sincerely,

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