



environmentally concerned citizens of orange

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Re: Ulan Coal Mine Mod 8-Ulan West Continued Operations
November 17, 2025

Dear Sir/Madam

I am writing to you on behalf of Environmentally Concerned Citizens of Orange to express our opposition the proposed extension of the Glencore Ulan Coal mine. ECCO is an environmental group which has consistently opposed any applications to extend the lives of existing coal mines. We do so for the following reasons.

Increased carbon emissions: It is anticipated that if approved to operate, the extension would be responsible for the release of over 105MT of additional greenhouse gas emissions. This is unacceptable. Not only will the mine extension be contributing to the already severe effects of global climate change, it also flies in the face of our national commitments to net zero. Australia is currently negotiating to host COP 31. It would be difficult to support our application should we approve such obvious contrary projects.

The project should not be assessed as a modification: The Mod 8 Ulan West proposal involves the development of a site situated outside the current Ulan Mine lease. It should therefore be assessed as a new project, and as such be subject to the environmental impact study and a full independent merit assessment.

Risk of water contamination: Part of the proposal involves the construction of a new tailings dam which proposes to occupy 132 ha of rehabilitated previously mined land next to the Goulburn River. The proximity of the dam could result in toxic contamination leaking into the river.

Loss of flows to the Talbragar River: If successful, mining operations on the proposed site will result in loss of flows to the Talbragar River, which is a significant tributary of the Macquarie River and a major contributor to flow to the Ramsar listed Macquarie Marshes.

Loss of Aboriginal heritage: The site proposed for Ulan coalmine extension will impact 71 known sites significant to Aboriginal heritage, sites which include ancient Aboriginal rock art.

Biodiversity impacts: Australia leads the world in rates of species extinction. One reason is habitat destruction caused by projects such as the Ulan Coal mine Extension. This current proposal threatened the habitat of endangered species such as the Large Eared Bat and the Eastern Cave Bat. It does so through impacting areas of fragile sandstone which provided vital habitat for these already threatened species. Recent research advocates that we need to prioritise

the needs of nature over those of economic gain if we are to reverse the current threats to our native biodiversity. We need to emphasise the need to put nature first when approving future projects such as the one in question.

Lack of biodiversity assessment: It is worth noting that the cumulative effect on the habitat upon which the microbats depend caused by mining operations in the area has not been assessed, nor has that of the cumulative loss of mature grassy box woodland caused by mining in the area. This is also important habitat for a range of threatened woodland species. It is also worth noting that the losses mentioned cannot be offset like for like.

The project cannot be justified: A frequent justification for such projects is that they provide much needed employment for regional communities. Such a justification is not supported in the case of mining extensions in the region. There is no need for extended coal mining to provide jobs. The mine extension is located within the Central West Orana Renewable Energy Zone. As such the labour force required for the mine extension would be competing with the Renewable Energy Zone for workers.

The community needs to transition away from a coal dependent economy: Coal dependent economies such as the Mudgee community need to prepare for the time when coal is no longer a viable commodity. Rather than support a failing industry the community needs to concentrate on the opportunities available to allow for a transition away from coal. The NSW Government is prepared to assist the transition by prioritising the Central West Future Jobs and Investment Authority to assist with the management of a transition away from coal mining.

Conclusion: The Ulan Mod 8 extension should not be approved. It cannot be justified environmentally, nor does it have a social licence to proceed. Rather than support such projects that will only prop up an industry ultimately doomed to oblivion, we should be concentrating on transition to industries which are sustainable and will provide future community economic and environmental sustainability and social wellbeing.

Yours sincerely
Stephen Nugent
President. ECCO