

**NSW Planning Portal**  
**Major Projects: SSD Modifications**  
**Contact Planner: Genevieve Lucas**

**Submission of Objection: Ulan Coal Mine Mod 8 - Ulan West Continued Operations.**

**Introduction**

Glencore's Ulan Coal Mine Mod 8 - Ulan West Continued Operations (Mod 8), seeks to allow an additional 45Mt of coal extraction and extend the mine operations until 2041. Mod 8 proposes an extension of the underground mining area as well as the construction of new surface support infrastructure. It seeks to extend mining operations into new areas, with significant implications for the environment and local communities.

Mudgee District Environment Group (MDEG) objects to the proposed Mod 8 extension.

In May 2025, Ulan Mod 6 was approved. On 14<sup>th</sup> November 2025, that approval decision was declared invalid by the NSW Land and Environment Court. As Mod 8 depends on and is integral to Mod 6, MDEG submits that Mod 8 must be rejected. Nonetheless we provide the following comments.

This objection identifies and analyses significant concerns relating to the initial project assessment, environmental impacts, community and social well-being, and economic implications. The proposed extension raises substantial risks to air and water quality, biodiversity, landscape and cultural integrity, and the health and amenity of local communities. Furthermore, there is no economic justification for the project.

We urge you to reject the Mod 8 proposal.

## **Project Assessment**

### **Initial project assessment**

This large proposed Modification should be assessed as a new project and should be subject to the full rigour of the planning system, including public critiquing of an Environmental Impact Statement provided by the proponent. It is not ‘substantially the same project’ as the existing mine; a condition which is required for an application to be considered as a Modification.

The proposal takes mining into an area that does not have a Mining Lease. The proponent has identified additional mineable resources within Exploration Licences (EL) 8687 and EL 9363 located to the west of their currently approved mining area. The proponent seeks to obtain approval to access this additional coal. The ELs held do not grant mining rights. MDEG contends that it is invalid for this project to be considered a Modification.

The proponent claims that ‘there are no significant changes to environmental impacts’ (O. Modification Report PDFpage53) when comparing Mod 8 to the original project – and thereby claiming a Modification status. MDEG disputes this statement and outlines significant additional environmental impacts later within this document.

The proponent’s supporting documentation reveals several areas of non-compliance or insufficient information, particularly in relation to biodiversity assessment, water management, and community consultation. In colloquial terms the assessment of Mod 8 is ‘very dodgy’. There are numerous claims not supported by evidence, and inconsistencies are identified within the documents with recommendations to ‘revisit the discussion’ (eg, App 6. Groundwater Impact Assessment PDFpage289)

The precautionary principle, as outlined in relevant planning instruments, requires that uncertainty regarding potential harm be resolved in favour of environmental protection. MDEG urges that the precautionary principle be applied.

### **Mod 8 reliance on invalid approval of Mod 6**

The NSW Land and Environment Court declaration that the approval for Mod 6 is invalid, has direct implications for Mod 8.

Mod 6 sought to extend the mine life from 2033 to 2035. As the Mod 6 approval no longer stands, the mine is required to cease operations in 2033. Mod 8 relied on that time extension to seek continuance from 2035-2041. Therefore there is no basis to proceed with Mod 8.

Mod 8 is no longer a workable proposal. The infrastructure within Mod 8 would have been directly connected to the Mod 6 underground longwall panels. That infrastructure cannot exist. Therefore Mod 8 cannot proceed.

## Environmental Impacts

### Greenhouse Gas Emissions

The release of more than 105Mt of additional Greenhouse Gases through this project is contradictory to the intent and actions required for Australian and international emissions reductions targets to be met. It is unprincipled to consider allowing such an increase.

There is insufficient reliable reporting of methane emissions. This is untenable.

### Climate Change impacts on the locality

Local Climate Change impacts are a mandatory relevant consideration for greenhouse gas generating projects. This consideration was emphasised by the recent NSW Court of Appeal decision to reject the expansion of the Mt Pleasant mine. It was reinforced by the NSW Land and Environment Court decision invalidating the approval for Ulan Mod 6.

Climate Change impacts in the Mid-Western locality have been extensive and the costs are massive. We have suffered drought, bushfires and significant flooding in recent years. The immediate emotional trauma and financial costs are borne by the immediately affected residents eg, loss of crops, livestock, fencing, houses and other structures. There is a consequential cost of loss of income and additional expenditure required to reinstate affected assets. This emotional burden and cost is on-going with increased insurance premiums in following years. However, this measurement of costs is merely the 'tip of the iceberg' as social and financial costs ripples through the community with many knock-on affects.

The social and emotional costs of Climate Change must be assessed.

The community also bears the stress and costs of Climate Change impacts through the initial loss and then the restitution of community infrastructure such as roads, bridges, causeways, and wayfinding signage. These matters are dealt with by authorities such as Mid-Western Regional Council and National Parks and Wildlife Service. The community pays for this rebuilding, regardless of the funding coming from a budget allocation or a grant.

The loss of bushland in the 2020 fires has caused staggering reductions in biodiversity, and likely increased the vulnerability of some species. The ['2019–20 Australian bushfires—frequently asked questions \(updates\)'](#) on the Federal Government website states *'The 2019–20 fires had both direct and indirect effects that will have had impacts on the vulnerability of species. Direct effects include the impact of radiant heat, smoke inhalation, and stresses associated with fleeing and coping with passing fires.<sup>[22]</sup> Indirect effects include post-fire impacts such as increased soil erosion and runoff into waterways, reduced availability of, and increased competition for, food resources, lack of shelter from predators, lack of suitable resources for nesting, and destruction of fencing which previously limited the range of invasive species.<sup>[23]</sup>'*

It is likely that mobile species retreated westward from the fires. The remaining Box-Gum Woodland (Critically Endangered Ecological Community) habitat including landscape features such as clifflines and sandstone outcrops is highly significant, and must be conserved as a plant community, with full

recognition of all biota likely to be present. This habitat (1743ha) would be impacted by the Mod 8 proposal, and it should not proceed.

The biodiversity loss due to the Climate Change induced fires must be assessed.

The proponent has not analysed the full impacts and costs of Climate Change on the locality. This must be provided by the proponent, and is a required component of project assessment.

## **Water Resources**

Underground mining causes subsidence and damages groundwater systems that store and transport water in the landscape. This proposal straddles the Great Dividing Range and impacts both the Murray Darling Basin and the Hunter River catchments. This significant and large area of potential impact requires that all water matters be assessed comprehensively. It is recommended that Mod 8 be referred to the Independent Expert Panel for Mining.

MDEG presents the following list of major concerns:

1. Groundwater interception: Mod 8 would extend significant groundwater drawdown and interception of surface flows for an additional 6 years. This continued interference represents a serious long-term dewatering of the landscape over an extensive watershed, that supports numerous springs and seeps critical in dry periods, that are culturally and socially very significant.
2. Water Modelling: There is little confidence in the reliability of the latest modelling predictions for Mod 8 due to insufficient groundwater monitoring, and the significant variations in predicted 'simulated' groundwater levels to observed 'measured' drawdown.
3. Mine subsidence and associated dewatering: The subsidence and associated dewatering caused by Mod 8 will drain water resources in the Blue Springs/Bungaba and Talbragar River area. Modelling predicts 17 properties and 14 private bores will experience greater than 2 metre drawdown, totally dewatering 1 bore. The mitigation proposed by the proponent of supplying water to the affected bore owners does not replicate the loss or ameliorate the landscape dewatering. The loss of flow to the Talbragar River has consequences for the Macquarie River and the Ramsar listed Macquarie Wetlands of International Significance. The Goulburn River would also suffer reduced inflows. This impact should not be permitted.
4. Goulburn River and The Drip – a Groundwater Dependent Ecosystem (GDE): Predicted declines in the regional Triassic groundwater levels of >2 to 50 metres, extending beneath the Goulburn River and The Drip GDE, with loss of groundwater baseflow, are alarming and unacceptable impacts considering the irreplaceable value of these natural features to the community and the environment (6. Groundwater Impact Assessment). Please note Ulan Coal Complex consent conditions 33 requires *'The applicant must ensure that the project has NO IMPACT on the water supply to The Drip'*.
5. Salt load: An additional 6 years of mine water discharge into the Goulburn-Hunter catchment should not be permitted. The reduction of flow combined with a salt load of 8-16 t/day would severely impact the Goulburn River National Park and all downstream water users. The impact on water quality of mine water discharge and associated salt load from the

combined Ulan, Moolarben and Wilpinjong mines must be comprehensively monitored and fully assessed for cumulative impact, by individual operation and as a whole.

6. New tailings dam: The detail provided for this major infrastructure covering 132ha is insufficient and the assumptions made are unsubstantiated. The proponent has not given construction details, or seepage prevention plans, or management and monitoring plans. This significant aspect of the proposal requires rigorous detailed planning. A tailings dam of 132ha adjacent to the Goulburn River diversion risks polluted seepage into the River for generations to come. Mod 8 should not be approved.

The proponent has not demonstrated adequate understanding of the cumulative impacts on regional water resources, particularly in the context of Climate Change and prolonged dry periods. The long-term dewatering of the landscape and risk of water pollution to the Goulburn River and downstream National Park from polluted groundwater seepage are unacceptably high, and MDEG does not support Mod 8 proceeding.

### **Biodiversity and Ecosystems**

The Mod 8 proposal would disturb an additional 1743ha of habitat for native flora and fauna. This includes sandstone escarpments, overhangs and caves.

There are significant concerns about the quality of the assessment undertaken in the Biodiversity Development Assessment Report (8. BDAR) and discrepancies with the Matters of National Environmental Significance report (20. MNES)

These issues are further outlined in the appended independent ecologist review (Appendix 1)

The key issues of concern are poor assessment of species listed as entities impacted by Serious and Irreversible Impacts (SAII) under the NSW Biodiversity Conservation Act 2016. Key species of concern include Large eared Pied Bat (*Chalinobolus dwyeri*), Eastern Cave Bat (*Vespadelus troughtoni*) and White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

Other threatened species with potential habitat such as Regent Honeyeater (*Anthochaera phrygia*), Koala (*Phascolarctos cinereus*) and New Holland Mouse (*Pseudomys novaehollandiae*) have not been assessed as required.

Mudgee-Wollar is listed as an [Important Bird Area](#) (IBA). The listing states '*This IBA consists of land around Goulburn River National Park, north of Wollemi National Park, inland from Newcastle. The IBA includes Goulburn River National Park, Munghorn Gap Nature Reserve and private land west to Gulgong and Mudgee, being defined by a number of woodland remnants used by Regent Honeyeaters around Mudgee, Buckeroo, Home Rule, Meroo, Ulan, Wollar, Windemere Dam and Murrumbidgee.*

There are known Regent Honeyeater records near the area of disturbance and known breeding populations in the district. A recent breeding event of Regent Honeyeater on the Goulburn River is a strong indication of this critically endangered species' presence in the district.

There are known Koala records near the Mod 8 site, and recent research has identified a large area of suitable habitat nearby ([Science for Wildlife](#)). MDEG suggests that the survey conducted would

have likely found Koala if the survey had not been relatively limited to the beginning of the breeding season.

The New Holland Mouse should have been included in the assessment. A breeding population of the species has been recorded to the East of Ulan mine.

Box-gum Woodland, the Large-Eared Pied Bat and the New Holland Mouse are all highly susceptible to the impacts of subsidence. The actual impacts on fauna particularly within subsided areas has not been investigated in detail.

It is estimated that the major fire season of 2019-2020 destroyed up to 24 million ha of bushland. The remaining habitat, flora and fauna, must be preserved. It is likely that fire to the East of Ulan caused some species to move westward and seek refuge in remaining pockets of bushland. Box-Gum Woodland subject to the impacts of Mod 8 must be conserved and all potential species surveyed adequately.

Mod 8 would impact species and ecosystems of importance. It cannot be permitted.

See also Appendix 1: Review of BDAR and EPBC report for Mod 8 - Ulan West Continued Operations. David C Paull. 10/11/2025

## **Community and Social well-being**

### **Impacts on Local Residents**

The Mod 8 area contains 17 private landholdings that will be directly impacted. The proponent has a history of purchasing impacted private property after approval has been granted. This has caused an incremental depopulation of the area and has not been assessed as a cumulative impact with the additional property acquisition in the region from the Moolarben Coal Mine and Wilpinjong Coal Mine operations.

Community cohesion and resilience has been diminished. Formal community organisation and informal neighbour support has been reduced. The loss of volunteers from the Rural Fire Service and loss of community functionality, agricultural activity and services and neighbour support networks has had a significant impact on the Ulan district that is not identified.

The Mod 8 proposal would undermine 4 houses and directly impact 6 private bores. The loss of farm water is of concern for the sustainability of farm enterprises and the potential further depopulation. This diminishes fire-fighting and other emergency response capacity.

### **Cultural Heritage**

There is evidence of continuous Wiradjuri occupation and connection to country within the Ulan mine area and surrounds. The headwaters of the Goulburn River is a highly significant cultural region. Any further disruption to cultural and spiritual links is untenable.

The impact on 71 known sites, which includes rock art, is a blatant addition to the cumulative impact of the 3 mines along the Goulburn River. The Wiradjuri nation has endured on-going disregard for and minimisation of their culture. This further impact should not occur. Mod 8 should be rejected.

## Cumulative Impacts

The proponent claims that :

‘The likelihood of significant cumulative impacts associated with the UWCO Modification is low due to:

- the nature of underground mining
- the minimal impacts predicted to amenity issues (air, noise, visual)
- the absence of changes to traffic movements or coal transportation from existing approved levels.’ (O. Modification Report PDFpage183)

This claim is disingenuous as it does not include impacts relating to additional Greenhouse Gas emissions, Climate Change impacts including costs, water interception, mine water discharge, risk of groundwater contamination, biodiversity loss, social impacts, and loss of cultural heritage. The ‘likelihood of significant cumulative impacts’ is high.

The lack of assessment of cumulative impacts in the region is of great concern. Moolarben Coal Complex and Wilpinjong Coal Mine are nearby and assessing each of the three mines and each new project individually, makes a mockery of any attempt to measure, monitor, mitigate and manage the environmental degradation and negative social, community and cultural impacts which occur.

Cumulative impacts on the social fabric and resilience of small rural communities are significant, especially given the historical legacy of resource extraction in the region. It is the extent of the total impact that is relevant.

## Economic Implications

The proponent claims that the Mod 8 will deliver substantial economic benefits. These claims are not balanced against the potential economic costs associated with Climate Change impacts, environmental degradation, and negative social, community and cultural impacts. The long-term costs of rehabilitation, potential liabilities for water loss and contamination or biodiversity loss, and the risk of stranded assets in a transitioning energy market have not been adequately considered. A more holistic economic assessment would weigh the short-term benefits of continued coal extraction against the long-term interests of the environment and community.

Mod 8 is situated within the Central West Orana Renewable Energy Zone (REZ). It is incongruous that additional coal mining would be permitted there - that would tie up labour, community resources and local government energy, limiting and retarding the development of the REZ, thus opposing government policy.

There is a major labour shortage in the region and workers are urgently needed for renewable industries and supporting additional construction and housing. Extending or expanding coal mining is contrary to facilitating and achieving the needed energy transition.

## **Conclusion and Recommendations**

In light of the significant regulatory, environmental, social, and economic concerns outlined above, this submission strongly objects to the Mod 8 proposal. The risks and uncertainties associated with the project outweigh the purported benefits, and the proponent has not demonstrated compliance with key legislative and policy requirements.

It is recommended that the regulatory authorities refuse approval for Mod 8 for the following reasons:

- This Mod 8 proposal relies on the unapproved Mod 6
- This project is not a Modification as claimed by the proponent – it is a large new project
- There are substantial risks to air quality (particularly Greenhouse Gas emissions and the consequent Climate Change impacts and costs on the locality), water quality, biodiversity and landscape and cultural integrity
- There are significant community and social well-being impacts
- There is no economic justification for the project.

This submission is made with the intention of supporting evidence-based decision-making that reflects the best interests of current and future generations.

Sincerely

Rosemary Hadaway

President: Mudgee District Environment Group

## **Review of BDAR and EPBC report for Mod 8 - Ulan West Continued Operations.**

David C Paull

10/11/2025

PO Box 67 Coonabarabran NSW  
10 November 2025

### **Summary**

The Proposed Modification is a controlled action, as well as requiring adherence to the Biodiversity Conservation Act (NSW), which requires assessment under the Bilateral Agreement and determination under the EPBC Act due to the listed threatened species and communities who are present. The proponent has failed to undertake these assessments for some matters according to parameters outlined in these methodologies. The conclusions regarding impact on certain species in the BDAR report and the MNES report on Commonwealth matters are different. In this respect, the proponent has failed to resolve questions, particularly regarding two MNES entities:

- Impacts on potential breeding habitat of Large eared Pied Bat *Chalinobolus dwyeri*
- Impacts on the New Holland Mouse *Pseudomys novaehollandiae*
- And other matters.

### **SAIL entities**

There are three SAIL entities identified by the NSW authorities:

- White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland
- Large-eared Pied Bat (breeding habitat only)
- Eastern Cave Bat (breeding habitat only)

These are also entities which conform to the relevant EPBC-listings. Other threatened species identified in the project area include the White-throated Needle-tail, Painted Honeyeater, Southeastern Glossy Black-Cockatoo, Grey-headed Flying Fox, Corben's Long-eared Bat, Powerful Owl, Barking Owl and Ausfeld's wattle. In addition, two species have been identified within a short distance of the footprint and have suitable habitat within this area, the Broad-headed Snake and the New Holland Mouse.

→ Importantly, the proponent only considered the SAIL impacts on Box Gum Woodland in the BDAR and not the cave bats because, "*Large-eared Pied Bat was identified within the Subject Land; however, breeding habitat was not detected despite extensive field survey. Therefore the SAIL is not applicable and no further SAIL assessment has been undertaken.*"

However, as pointed out in the EPBC Report,

*"Caves and overhangs are present throughout the Referral Area. Tensile cracking and shear movements may cause minor dislocation of rock material, reducing the stability of overhangs*

*and steep slopes (SCT Operations Pty Ltd, 2023). Rock falls may occur on up to 20% of the length of the sandstone formations located directly over longwall panels and chain pillars between panels (SCT Operations Pty Ltd, 2023). Rock falls may result in damage to roost sites and maternity populations (if determined to be present). There is approximately 6.5 km of sandstone escarpments throughout the Referral Area that will be undermined (Umwelt Australia Pty Ltd, 2009) that contain suitable roosting sites for Large-eared Pied Bat. A 20% impact to the length of sandstone escarpments equates to a potential impact to 1.3 km of roosting habitat.*

***Whilst breeding habitat may be present within sandstone escarpments, not all roosting habitat is breeding habitat. The impact to breeding habitat has not been quantified yet and is subject to the completion of field surveys.”***

In other words, breeding habitat may exist, but adequate surveys have not been undertaken to determine their presence in the footprint. This is further admitted in the BDAR, that while “Compliance is expected” and that “...No change to forecast of maximum effects or impacts and consequences expected from the proposed mining, **other specialists (are required) to assess impacts to biodiversity.”**

### **Scope of impacts**

The proponent expects the effects of subsidence as one of the key impacts on biodiversity as a result of the project as it may have significant impact on:

- sandstone formations directly above the longwall panels may experience cracking and rock falls; natural features including vegetation, water flow (surface and groundwater) and landscape features such as clifflines,
- man-made structures such as roads, houses, buildings, fences and utilities,
- items of Aboriginal heritage through damage to clifflines/rock structures which may house sites of cultural value.

The installation of surface infrastructure and associated roads and utilities to service the Proposed Modification will require land clearing and will have direct impacts on biodiversity, including up to a maximum of 101.45 ha of native vegetation in the Development Footprint. This includes 31.77 ha of BC Act listed Box Gum Woodland, and 2.43 ha of EPBC Act listed Box Gum Woodland. Most of the BC Act listed Box Gum Woodland (92%) is located within open cut mine rehabilitation planted in 2017, which is of lower biodiversity value compared to remnant woodland and forest. These require offsetting under the NSW Biodiversity Offset Scheme (BOS).

Additional impacts to biodiversity as a result of subsidence could potentially include:

- loss of habitat associated with changes to groundwater systems (e.g. stygofauna and other groundwater dependent ecosystems) and surface water regimes (aquatic and hyporheic fauna impacted through loss of or changes to surface flows and loss of base flow
- direct impacts associated with subsidence remediation work, including clearing for access tracks and earthworks required for physical repair to land deformation and subsidence cracks.

Other indirect impacts include, edge effects, the potential introduction of invasive species associated with clearing vegetation.

Prescribed impacts which are likely to occur, as outlined in the Biodiversity Conservation Regulation 2017 (BC Regulation), also includes effects on habitat connectivity, and water quality.

## **Mitigation**

(Box Gum Woodland) has been prioritised through the preferential locating of the UWCO Modification Area in areas not classified as Box Gum Woodland, or where the vegetation/habitat is in low condition (i.e. Derived Native Grassland (DNG) areas). In addition,

*“Further mitigation measures are proposed to be adopted to manage the extent and severity of the remaining residual impacts during construction and operational phases. These include management measures, monitoring and adaptive management measures. UCMPL are committed to delivering an offset strategy that appropriately compensates for the unavoidable loss of biodiversity values and residual impacts of the UWCO Modification. The strategy will be developed in consultation with DPHI and based on options available under the BC Act and BC Act Regulations.”*

In other words, no offset strategy has yet been submitted, nor any assessment to the feasibility of such an offset strategy being able to fulfil offset requirements.

## **Survey shortfalls**

The assessment undertaken to confirm the presence/absence of breeding locations for the Large-eared Pied Bat needs to be questioned. Despite several kilometres of suitable habitat within the development footprint and surveys of the species undertaken that identify 67 different locations, the BDAR states, *“Breeding habitat was not detected within the Subject Land despite extensive survey effort. Therefore, a species polygon for breeding habitat was not generated”*.

In contradiction, the discussion on this species in the MNES report states, *“Whilst breeding habitat may be present within sandstone escarpments, not all roosting habitat is breeding habitat. The impact to breeding habitat has not been quantified yet and is subject to the completion of field surveys.”*

Table 2-5 of the BDAR states that 28 hours of roost searches were undertaken for this species, but what criteria were used to make this identification is not clear. The MNES report was finalised in February 2025 and the BDAR was submitted in October 2025. These surveys could have been undertaken in 2025 after the finalisation of the MNES report, but if so would have been done outside the recommended survey period for this species. No dates for the surveys are provided. No expert advice was sought for this species.

*Delma vescolineata* (Hunter Valley Delma) was not assessed as part of this BDAR due to the timing of its inclusion as a candidate species in the Biodiversity Assessment Method Calculator which occurred on the 4 August 2025, after the completion of field surveys for the Modification.

The proponent, however goes on to say that, “*It is considered this species is unlikely to occur within the Development footprint, based on the known extent being approximately 120 km from the UCC.*”

This statement is difficult to justify from an ecological perspective. The habitat within the footprint is consistent with known habitat in areas of the Hunter Valley. A recently described species is likely to have unknown extant populations.

Surveys, whether targeted or general, were not undertaken for the New Holland Mouse, *Pseudomys novaehollandiae* despite records from near the development footprint and suitable habitat being available in the affected area. Elliott trapping is the most effective method of detection and does not appear to have been undertaken. This species has a burrowing habitat so would be greatly affected by mine subsidence. Its EPBC listing means that according to the Bilateral Agreement, this species should have been targeted in the field assessment process.

### **Assessments of significance**

Assessments of significance were undertaken just for the nine MNES occurring within the Subject Land in accordance with the Matters of National Environmental Significance significant impact guidelines 1.1 (DoE 2013). None were done in conjunction with the BC Act. The assessments of significance found that the Modification **is likely to have a significant impact** on the following MNES:

- Box Gum Woodland CEEC
- Large-eared Pied Bat

Despite an assertion in the BDAR that a significance assessment test was undertaken for the New Holland Mouse, none was found in the MNES compiled by consultants Umwelt.

The New Holland Mouse was listed as a threatened species in NSW in April 2025, some six months prior to the submission of the Environmental Assessment for the Modification. Yet no account has been made of this species within the BDAR or the MNES report. It is now listed as a Vulnerable species under NSW and Commonwealth legislation.

Habitat for this species is described variously as, “open heathlands, woodlands and forests with a heathland understorey and vegetated sand dunes.” (New Holland Mouse, <https://threatenedspecies.bionet.nsw.gov.au/profile?id=20253>). Habitat at the Modification 8 area is consistent with these characteristics, within several vegetation communities.

The species has been detected just east of the Ulan Mine area, near Wilpingjong Creek in 2014. The account of the capture shows that there is a local breeding population, “*Two females captured in Elliott trap on successive days and on retrapped. One female was pregnant, the*

*other was lactating. A male had captured at this same location a year prior.”* (Bionet Atlas record data).



BioNet Record of New Holland Mouse (accessed 10 November 2025).

Both the New Holland Mouse and the Large-eared Pied Bat are highly susceptible to the impacts of subsidence. While the proponent states the impacts of subsidence from the Modification will fall within acceptable and predicted levels of surface tilting, cracking and damage to sub-surface environments, the actual impacts on fauna within subsided areas have not been investigated in detail. Any comments made in relation to this should be taken with caution by the consent authority.

Similar statements can be made regarding the impacts on Box Gum Woodland. The proponent's earlier conclusions in the MNES report that there will be a significant impact are not borne out by the SAI assessments undertaken in the BDAR.

## **Conclusion**

The assessments for Ulan Modification 8 appear to have undertaken in some haste, with not all aspects adequately covered consistently in the NSW and Commonwealth assessments. Along with some important omissions, the consideration of important species has suffered as a result, appearing to undermine the results for a transparent and robust assessment.