

For the last two years, in Mudgee, three of the state's biggest coal mines (Moolarben, Wilpinjong and Ulan) have been working to push through massive expansions. All three are lining up for public exhibition, one after another. Wilpinjong mine by Peabody has only a few weeks ago closed their submission process. Now we have Ulan followed by Moolarben coal mine.

Ulan Coal Mine Mod 8 – Ulan West Continued Operations has been referred to as a modification. It is not a modification. Due to the size of this project it will have a further detrimental impact on communities, nature and our climate. Presenting as a modification conveys the ideas of a slight change. This is a sneaky disingenuous way for big industry to get approval quickly as they attract less scrutiny. All 3 projects will cause cumulative damage if passed, so considering them separately gives false information as to the cumulative impact that they will cause the Mudgee community, biodiversity and our climate.

Another important reason for disallowing this project to proceed is that the **Ulan Coal Mine Mod 8** project is an extension of the recently approved by Department of Planning Ulan Mod 6. A legal appeal was sought and won in court recently about a week ago by the Mudgee District Environment Group.

The Mod 8 cannot proceed without Mod 6 approval. Because Mod 6 has now been overturned, Mod 8 is no longer valid. I make a formal objection to the Mod 8 Modification that MUST be rejected by the government on this basis alone.

Key points of objection:

- **Mod 6** extended the mine's life from 2033 to 2035.
- **Mod 8** relies entirely on that time extension — it covers 2035 to 2041. Now that Mod 6 has been overturned, Mod 8 has no basis to proceed.
- **Mod 8's** proposed infrastructure is also **directly attached** to Mod 6's underground longwall panels. Without Mod 6, that infrastructure cannot exist — meaning **Mod 8 is fundamentally unworkable.**

As there is a formal process for submissions still on the government's website these points are also key to my **rejection of this project in its entirety.**

1. Releasing over 105 Mt of additional Greenhouse Gas emissions, poor monitoring and reporting of methane emissions. Glencore does not report methane emissions and altered the baseline calculation for annual CO2 - emissions in 2014 to below requirement for offsets under the Federal Safeguard Mechanism, with no explanation. They therefore cannot be trusted to be transparent and honest.
2. Outside existing mine boundary with additional infrastructure disturbance - should be assessed as a new project.
3. Constructing a large new tailings dam area of 132 ha within a revegetated, rehabilitated old open cut pit next to Goulburn River that risks leakage of toxic contaminants into river systems is unacceptable. The proposed area for storage of coal waste from the washery abuts the Goulburn River with no monitoring points to measure seepage into the river. This is a threat to The Drip gorge and downstream water users including Goulburn River National Park.
4. Wholly west of Great Dividing Range within the Murray Darling Basin - loss of flows to Talbragar River, tributary of Macquarie River feeding into significant Macquarie Marshes. This mine expansion will cause a predicted additional loss of 26.5 million litres per year of flow to Talbragar River. This does not report cumulative loss of flows from current approvals.
5. Extended water releases into Goulburn River increasing salt load downstream to Hunter. The Goulburn River will also be impacted by additional loss of base flow. Most importantly, it will add another six years of mine water discharge carrying over 15,000 tonnes of salt (7 tonnes per day) into the Goulburn /Hunter River ecosystem. The cumulative impact of these three large coal mines on the Goulburn River has never been fully assessed.

6. Loss of Aboriginal cultural heritage and spiritual landscape for Wiradjuri Nation – impacting 71 known sites, including rock art. The cumulative loss of significant Aboriginal cultural heritage in the Ulan area is not assessed. There is ample evidence of continuous Wiradjuri occupation of the region with spiritual connection to country.
7. Disturbing an additional 1743 ha with sandstone escarpment, caves and overhangs.
8. The proposed extension of mine disturbance will impact areas of fragile sandstone landscape including 6.5 kms of escarpment with rocky outcrops and cliff lines higher than 10m. These provide important habitat for the endangered Large-eared Pied Bat and Eastern Cave Bat. This habitat loss cannot be offset.
9. The destruction of Box Gum Woodland where only less than 5% remains untouched in NSW will affect the critically endangered Regent Honeyeater (only 300 left in the wild) as this is their habitat and food source. The Barking Owl is listed as vulnerable in New South Wales. It inhabits open woodlands like the Box Gum Woodland and forests. The Powerful Owl is Australia's largest owl and is vulnerable in NSW. It relies on remnant bushland like the Box Gum Woodland and requires large tree hollows for nesting as in forest areas. Both these owl species will be effected by this project's approval and extension. The endangered Koala is also affected as the ongoing disturbance of Koala habitat from mining is not assessed. This therefore represents cumulative ongoing impact on nature.
10. Final layout of surface infrastructure not yet determined – mine plan not finalised .
11. Undermining 17 private properties directly impacting 4 houses and 6 private bores.
12. Increasing social impacts, loss of farm water and ongoing disturbance of rural way of life.
13. This project is not needed to provide regional jobs – there is a huge workforce shortage for renewable energy projects and other industries in the Central West. The NSW Government has prioritised the Central West Future Jobs and Investment Authority to manage the transition away from coal mining. Approving more coal mine extensions contradicts the NSW government's strategy.
14. Renewables are the future. The government has set NSW net zero targets that cannot be achieved if we extend more coal mines. The focus should be on cleaner, cheaper ongoing power for NSW residents provided by renewables. This pathway is also better for nature, our trees, vital ecosystems, and communities as well as better for our climate. We do NOT need more coal.

I strongly reject this proposal as it is a **flawed approval process** that should be assessed as a New Project – not a Modification, that removes scrutiny by the Independent Expert Panel for Mining. A sneaky tactic that was employed by Glencore to get their proposal passed with minimal scrutiny. Ulan West Mod 8 presents severe risks to water, biodiversity, and cultural heritage. Despite underperforming coal production, the expansion threatens local communities and ecosystems, with limited public benefits not outweighing significant environmental, social, and cultural costs.

Thank you for considering my submission.

Lucia Smith