

We have had Wilpinjong coal mine expansion (Peabody) presented to the public already. Peabody Energy is proposing to extract an **additional 34 Mt of ROM** coal from the Wilpinjong coal mine before it is due to close in December 2033.

**The next in line is Ulan Coal (Glencore) that has approval already to mine 20 Mt/year thermal coal, and with their current modification are seeking to mine a further 43 Mt up to 2041.**

This will be followed by Moolarben (Yancoal)- Yancoal who is seeking to extract an **additional 40 Mt of ROM** (run-of-mine) coal from the Moolarben coal mine between 2025 and 2034.

All of these projects are three of the state's biggest coal mines (Moolarben, Wilpinjong and Ulan) in operation today.

**This submission concerns the Ulan Coal (Glencore) Mine Mod 8.** Its modifications are large in size, so should be considered as a new project. The extended timeframe to operate to 2041 is another reason why this project is not a modification as this represents a significant change in the duration or timeframe of this project. This project should be viewed as separate new project thereby needing a higher level of scrutiny. This must be called out for what it is a deceitful way to obtain approval.

This operation now covering 120 km<sup>2</sup> was first established in the early 1980's as a large open cut mine that diverted 3km of the Goulburn River. At the time it was the largest coal mine in the southern hemisphere. Subsequent approvals in 1998 and 2010 allowed for two large underground longwall mines to extract up to 20 mtpa until 2035. This is operates as an export mine only.

Glencore has submitted Modification 8 to extend the longwall operations to the west into EL 8687 over 1994 ha (Bungaba area). A drilling program has been carried out on private property since 2019. Another small exploration lease EL7542 is directly to the north of the Bungaba EL. An operational release (ELA 6253) was approved to the north of the current mining lease in May 2022 covering 4145 ha (now EL 9419) with a term of six years to 2028. Looking at its history it shows that Glencore is continually 'changing the goal posts' and asking for more. What astounds me is that Glencore's requests are always approved by the government.

This Ulan Mod 8 project is an extension of the Ulan Mod 6, which was recently approved by the Department of Planning. However, the Mudgee District Environment Group have just won a legal appeal in court to stop Mod 6.

**What is important is that Mod 8 cannot proceed without Mod 6 approval. Because Mod 6 has now been overturned, Mod 8 is no longer valid.**

#### **Significant reasons for my objection to the project**

Key concerns with Ulan Mod 8 mine expansion are-

- **Extends Coal Mining:**
  - Seeks to extend thermal coal mining for a further sixteen years (to 2041), extracting an additional 43 million tonnes of coal.
  - Minimises cumulative impacts of coal mining that straddles the Great-Dividing-Range affecting two major catchments Murray-Darling Basin & Hunter River.
- **Climate Impact:**
  - Would add 105 Mt CO<sub>2</sub>-e of Scope 3 emissions, an additional 45% on the currently approved operations (*including Modification 6*).
- **Water & Groundwater Damage:**
  - Reduces base flows to Talbragar River, threatening Macquarie Marshes (Ramsar-listed wetland) and Goulburn-Hunter catchment. The Talbragar River in Murray-Darling catchment will be significantly impacted.

- It introduces a dangerous and toxic legacy to this landscape risking the long-term river health and viability of the Goulburn and Hunter River ecosystems.
- Will export over 15,000 tonne salt loads to the Goulburn and Hunter River system by extending Mine water discharge for six years.
- Plans to significantly increase toxic tailings dam infrastructure to the river edge (132 ha area), risking seepage to river flow and downstream Goulburn River National Park and The Drip Gorge ecosystem.
- **Biodiversity Loss:**
  - The project will impact 101.45ha of native vegetation, including 34ha of **critically endangered** Grassy Box Gum Woodland whereby less than only 5% remains untouched in NSW. This flora is crucial to the survival of many threatened species.
- **Threatened Species:**
  - It will affect habitats of endangered species, including the Large-Eared Pied Bat and Eastern Cave Bat.
  - Direct impacts on critically endangered Regent Honeyeater (habitat in Mudgee-Wollar Key Biodiversity Area).
  - Risks to endangered Koala and Brush-tailed Rock Wallaby.
- **Cultural Heritage Risk:**
  - Project is on Wiradjuri Country subject to a Native Title Claim and will impact 71 known Aboriginal sites.
  - The area holds cultural significance for the Wiradjuri people.
- **High risk placement of Tailings Dam**
  - Expands toxic waste storage adjacent to the Goulburn River, risking seepage downstream into the National Park.
  - The Ulan West Continued Operations (UWCO) Modification proposes the construction of 132 hectare new tailings disposal area (with associated overburden stockpiles) to be built within an old open-cut pit that has been partially rehabilitated and revegetated with native trees, plantings date back to before 2000. The proposed boundary of the tailings disposal area goes to the edge of the Goulburn River. The old rehabilitated pit – Ulan Open Cut -1 - was backfilled in the 1990s with coal rejects and overburden.
  - The map presented by Glencore was an *out-of-date aerial map that misrepresents the current mine layout*. **The stated rationale** for the location of the proposed tailings storage facility to ‘*minimise impacts*’ is based on assumptions and unsubstantiated claims to be.... ‘*feasibly practicable*’. The Soils, Land and Agriculture Report (p.29) states it did not assess the proposed 131 ha new infrastructure Tailings Disposal Area.

Other concerns- What is a serious concern is that Glencore Ulan Coal has provided **no details** on how this significant infrastructure will be constructed, how it will be lined to stop seepage of toxic groundwater, how it will be managed or monitored for groundwater leakage to avoid contamination of the river over 100s of years, post mining. Mitigation measures must be mandatory but Glencore always gets away with the least and asks for the most.

There is no information on what investigations were undertaken to confirm substrate characteristics, and groundwater levels, where excavated overburden will be placed, or what alternate sites were considered? Surface Water (App 7) refers to a report by Aurecon (2025) but there is no link to this reference.

The justification for this expansion is very poor. Although Ulan Mine has approval to extract up to 20 million tonnes of coal annually until 2035, it only managed to extract 9.29 million tonnes in 2024. The promised public benefits such as royalties and economic contributions are not being met, while the environmental, social, and cultural costs continue to escalate.

**This project will longterm:**

- Impact the Murray–Darling basin, the backbone of Australia's agriculture industry.
- Impact 1,734 ha including 191 ha of vegetation clearing.
- Undermine 6.5km of rugged sandstone escarpment.
- Create cumulative impacts on the Talbragar and Goulburn Rivers through groundwater and surface water interception.

These are serious ongoing negative impacts to our environment that will continue decades into the future well after this coalmine ceases operating. The negative effects for nature especially on our already compromised Murray -Darling River system that sustains communities and wildlife in regional NSW will be huge. Along with the high level of salt discharge for another six years that will carry over 15,000 tonnes of salt (7 tonnes per day) into the Goulburn /Hunter River ecosystem.

I strongly urge the NSW government to think seriously about this project and **reject** it completely. Prioritise the protection of communities, nature and especially our river systems that will be significantly impacted by this project.

Your sincerely