

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.

We have had Wilpinjong coal mine expansion. Peabody Energy is proposing to extract an **additional 34 Mt of ROM** coal from the Wilpinjong coal mine until December 2033.

Ulan Coal (Glencore) has approval already to mine **20 Mt/year thermal coal** and are seeking to mine a further **43 Mt up to 2041**.

Moolarben- Yancoal is seeking to extract an **additional 40 Mt of ROM** (run-of-mine) coal 2025 to 2034.

I mention this so as to understand and factor in the context of the situation of 3 large so-called 'modifications' that should be in their own right classed as new projects.

The proposed mine expansion should not be assessed as a modification because it falls entirely outside the current mining lease causing new previously unassessed environmental impacts and therefore differs substantially from the current approved mine. This 'modification' proposal should be assessed as a new project so that it receives a full independent merit assessment. This is absolutely crucial because of its severe negative impacts.

The **Mod 8** application is to mine a further **43 Mt up to 2041**. Ulan Coal Mine falls within the Central West Orana Renewable Energy Zone (CWOREZ). There must be no more expansion of coal mining to maintain a safe climate. The Mod 6 approval 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. This changes the situation completely now.

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**.

Mod 8 cannot proceed without Mod 6 approval.

Additionally these other points are also key to my **rejection** of this project in its entirety. **My objections are-**

1. Methane monitoring – Scope 1 emissions

Glencore does not report methane emissions and altered the baseline calculation for annual CO₂ -e emissions in 2014 to below requirement for offsets under the Federal Safeguard Mechanism, with no explanation. This indicates a lack of transparency and honesty.

2. New Tailings Dam

A 132 ha new tailings dam area (and associated stockpile) is additional to the current approved mining impacts. 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. The chosen site is an old revegetated open cut mine, backfilled with coal rejects and disturbed soils. This is a new toxic legacy in the landscape further risking river health. No details are provided on how this significant infrastructure will be managed or groundwater leakage monitored.

3. Water Impacts

Subsidence or land collapse caused by underground mining damages groundwater systems that store water in the landscape. Groundwater provides base flows to rivers and creeks. This mine expansion will cause a predicted additional loss of 26.5 million litres per year of flow to Talbragar River and this does not report cumulative loss of flows from current approvals. The Talbragar River is a major tributary of the

Macquarie River in the Murray Darling Basin that flows in below Burrendong Dam. These flows are directly connected to the internationally significant Macquarie Marshes.

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 the three large coal mines on the Goulburn River has never been fully assessed.

4. **Aboriginal cultural heritage impacts**

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. Ulan Mod 8 will impact an additional 71 recorded sites.

5. **Biodiversity impacts**

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. The cumulative loss of irreplaceable microbat habitat across the three adjacent mines is not assessed.

The cumulative loss of mature, healthy Box Gum Woodland CEEC in the region through mine clearing has not been assessed. This ecosystem provides important habitat for a range of threatened woodland animal species.

Large-eared Pied Bat- The large-eared pied bat's contribution to nature is primarily through **insect control**, as it preys on a variety of flying insects, which helps to control pest populations. As a member of a threatened species, its conservation is also important for maintaining overall **biodiversity** and forest ecosystem health, as well as providing valuable services like pollination and seed dispersal.

Eastern Cave Bat - The Eastern Cave Bat contributes to nature by controlling insect populations, such as mosquitoes and moths, which helps manage pest outbreaks. It plays a role in the local ecosystem by acting as a predator for insects, and as a small mammal, it is part of the local food web.

Regent Honeyeater- The ongoing loss of important habitat in NSW for the critically endangered Regent Honeyeater is not recognised or assessed. There are approximately 300 birds that remain in the wild. There are current records of breeding activity in the district that are not identified in the assessment report.

Koala- listed as endangered and situation is currently getting worse due to sustained heavily industrialised logging of native forests across NSW even within the proposed boundaries of the Great Koala National Park until recently. Ongoing disturbance of Koala habitat from mining is not assessed.

Barking Owl- The Barking Owl contributes to nature as a predator and is crucial for maintaining the health and balance of its woodland and forest ecosystems, and it is considered a flagship species for the conservation of these mature forests.

Powerful Owl- Acts as an apex predator and maintains ecosystem balance. They are also vital for conservation efforts, with habitat protection benefiting other species.

Flora – Grassy Box Woodland- provides habitat for diverse flora and fauna including many endangered and critically endangered species like the Koala and Regent Honeyeater and supports a productive understorey of grasses and wildflowers. These woodlands are also vital for environmental services such as erosion control, salinity management, and soil formation, and they serve as crucial wildlife corridors for animal movement, which is increasingly important as the climate changes.

6. **Final Mine Plan**

The final placement of infrastructure in the landscape has not yet been provided because of ongoing negotiations with private landholders. This issue should have been resolved before the proposal was lodged and accepted by the Department of Planning. A final mine plan should be submitted for consideration.

7. Social impacts

The proposal will impact 17 private properties, directly under-mining 4 houses and lowering water availability in 6 private bores including total dewatering of one. The mitigation measure of providing replacement water will not continue after mining is finished. The Ulan Mine has bought out a large number of properties over time because of severe impacts of subsidence and noise from ventilator fans. This diminishes the local community and removes neighbourhood support in a remote rural area.

8. Not substantially the same project

The proposed extension should not be assessed as a modification because it is not substantially the same as the current Mine approval:

- Falls entirely outside the current mining lease
- Introduces new infrastructure eg new 132 ha tailings disposal area, additional ventilators, tracks
- Impacts an additional 1,734 ha landscape
- Increases impacts on groundwater, creeks and rivers
- Destroys irreplaceable endangered species habitat
- Causes additional biodiversity impacts under Federal environmental law
- Destroys a new area of Aboriginal cultural heritage significance
- Directly impacts 17 private properties, threatens built structures and private bores
- Releases 105 Mt additional greenhouse gas emissions

9. Not Justified

There is no need for extended coal mining in the region to provide local jobs. Mining is now competing for skilled labour urgently required in the construction, housing and renewable energy industries. There is a major labour shortage in the Central West with local workers needed for the CWO REZ construction.

The NSW Government has prioritised the Central West Future Jobs and Investment Authority to manage the transition away from coal mining. The Mudgee region has many opportunities to diversify the economy.

Approval of 3 successive coal mines that will damage environmental values, destroy species habitat, lead to species extinction, exacerbate and make climate change worse and that also focuses on coal that will be exported anyway is not in Mudgee's interest or the interests collectively of NSW.

We have renewables that we have made a commitment to in line with NSW targets, that should be a focus for our state with its sun and vast landscape that can be utilised to create cleaner, cheaper ongoing power for NSW residents. 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.

The Ulan West Modification 8 involves exploration in areas EL 8687 and EL 9363 has been assessed as part of the Ulan West Continuation Project, which involves an additional 7 underground longwall panels extending westward. These panels are predicted to produce approximately 38 million tonnes of coal, with operations continuing until 2041.

There are significant potential impacts on water resources, biodiversity, Aboriginal cultural heritage, and the local community. Many small farms and properties in the area depend on springs and a high water table, which are already under pressure from groundwater drawdown due to ongoing Ulan Mine operations. And with the current poor health of the Murray-Darling River System, approval of this coal mine will only exacerbate the situation more, making it almost impossible for our inland river systems to recover that will affect farmers, communities and wildlife to survive long term.

I strongly reject this project and I urge the NSW government to do the same.

Thank you for considering my submission

Janice Haviland