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Submission – Ulan (08_0184) Mod 4

This is a submission in objection to the proposed Ulan Mod 4 project.

Lock The Gate is concerned that the cumulative impacts on the Goulburn River from multiple mining projects in the region, including Ulan, have still not been assessed. The piecemeal approach to water impact assessments, involving multitudinous small studies for mines, mine extensions, and endless modifications (such as this project), do not allow for proper understanding of the risks of all this mining activity to water users and the natural environment.

Ulan is an area of highly significant groundwater resources, and the Mod 4 project will further increase the pressures on these resources, and the risks to water users and ecosystems, including the groundwater dependent (and much loved regional icon) Drip gorge, less than 8km from the modification project area.

We submit that no further mining projects – including Mod 4 – should be approved in the Goulburn River catchment until a proper cumulative assessment of the impacts and risks of mining has been carried out.

We are also concerned that the proponent may be downplaying the risks of the Mod 4 project to Aboriginal heritage, in particular to the Mona Creek rock shelters, which the proponent is required to protect from mining impacts under the current approval. The Environmental Assessment states that monitoring of existing operations indicates that longwall panels can be extended closer to the Mona Creek shelters without putting them at risk, but provides insufficient evidence, in our view, to support this claim.