

2 May 2018

Hunter Branch
hunter@npansw.org.au

NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001
Lodged at <<http://majorprojects.planning.nsw.gov.au>>

Dear Sir/ Madam

ULAN CONTINUED OPERATIONS PROJECT - MODIFICATION 4

The Hunter Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on the Ulan Continued Operations Project - Modification 4 Longwall Optimisation Project.

Established in 1957, NPA is a community-based organisation dedicated to the protection and conservation of nature. Our activities are particularly focused towards advancing:

- long-term protection of biodiversity and its supporting ecological processes
- an expanded network of protected natural areas
- better systems of environmental law, policy, and planning
- evidence-based natural resource management
- a closer connection between people and nature.

The project represents a further expansion to the Ulan Mine, which has been operating since the 1980s. Currently approved mine operations, together with those of the neighbouring Moolarben and Wilpinjong mines, are having a major cumulative impact on streamflow in the Goulburn River. This is due to extensive groundwater extraction by each mine, thereby depriving the river of its natural base flow and substituting instead treated mine water discharge.

The project seeks to further increase the volume of permitted groundwater extraction by 4%. This is being proposed without any assessment of wider regional / cumulative impacts on the Goulburn River. For example, we are particularly concerned about the likelihood of further degradation of aquifers that supply "The Drip" and downstream areas of Goulburn River National Park.

Approvals to date have been made on a piecemeal mine-by-mine, modification-by-modification basis, with no proper consideration of overall upper limits to resilience in the downstream environment. We therefore call for the appropriate investigations to be undertaken before further mine expansions are approved. This should be carried out independently from the mine proponents. Mine water discharges should be regulated in accordance with clear environmental flow rules that mimic natural flows.

Due to the significant impacts referred to above, we wish to record a formal objection to the project.

Yours faithfully



Ian Donovan

**President, Hunter Branch
National Parks Association of NSW**