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NSW Department of Planning, Housing and Infrastructure
Via Planning portal

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**Submission Against the Ulan Coal Mine Mod 8 – Ulan West
Continued Operations Project**

Application: MP08_0184-Mod-8

Status: OPPOSE

Introduction

Healthy Rivers Dubbo is a grassroots community group providing a strong voice for our rivers, aquifers, and wetlands — for the benefit of wildlife, plants, and people..

We strongly object to Glencore's Ulan Coal Mine Modification 8 – Ulan West Continued Operations Project, which would extend underground mining west of the Great Dividing Range, within the Murray–Darling Basin, until 2041.

This project poses unacceptable risks to groundwater systems, rivers, and the ecological integrity of the Talbragar, Goulburn, and Macquarie Rivers. It also undermines the integrity of the Macquarie Marshes, one of Australia's most important wetlands.

This proposal should not be assessed as a modification. It falls outside the current mining lease, introduces new infrastructure, and creates unassessed hydrological and ecological impacts. It must therefore be assessed as a new project through a full Environmental Impact Statement (EIS).

Water Impacts — Core Grounds for Objection

The Ulan Mod 8 expansion will cause major, irreversible impacts on rivers, aquifers, and catchment health.

a. Groundwater drawdown and flow loss

Longwall mining causes subsidence that fractures rock strata, disrupting aquifer structure and storage. This modification is predicted to cause an additional loss of 26.5 million litres per year of flow to the Talbragar River, a tributary of the Wambuul/Macquarie River. These flows feed the Macquarie Marshes, an internationally significant Ramsar-listed wetland.

Cumulative flow loss from three major coal mines (Ulan, Wilpinjong, Moolarben) has never been properly assessed, despite their interconnected impacts on the region's groundwater and surface water systems.

b. Cross-catchment water interception

The Ulan Mine spans the Great Dividing Range, directly affecting both the Murray–Darling Basin and the Hunter River catchment. The Mod 8 expansion would extend operations further west, increasing water loss from the Murray–Darling Basin system, already over-extracted and climate-stressed.

c. Contaminated discharges to the Goulburn River

The proposal extends mine water discharge for another six years, adding an estimated 15,000 tonnes of salt (7 tonnes per day) into the Goulburn/Hunter system. This threatens downstream water quality, including The Drip Gorge, Goulburn River National Park, and agriculture.

The cumulative increase in salinity and heavy metal concentrations has not been independently assessed, violating basic precautionary and intergenerational equity principles.

d. New tailings dam next to the Goulburn River

The proposed 132-hectare tailings dam will be built in a rehabilitated open-cut void beside the Goulburn River. This poses a serious contamination risk from seepage and failure. There are no proposed monitoring points for seepage into groundwater or the river. This infrastructure will create a new toxic legacy site in the landscape,

threatening surface water, groundwater, and the ecological health of the Goulburn River for decades.

Healthy Rivers Dubbo opposes this proposal on water grounds alone. The impacts on river flows, aquifer recharge, and water quality are incompatible with sustainable catchment management and breach *NSW Water Management Act 2000* objectives.

The Proposal Is Not a Genuine "Modification"

The project should not be treated as a simple modification. It:

- Falls entirely outside the current mining lease,
- Adds 1,734 hectares of new disturbance,
- Introduces major new infrastructure (tailings dam, ventilators, haul roads),
- Extends mining by six years, and
- Causes new hydrological, biodiversity, and cultural heritage impacts.

This scale of change constitutes a new project under planning law and requires a comprehensive EIS with cumulative catchment-level impact analysis.

Threats to Rivers, Wetlands, and the Murray–Darling Basin

The Ulan Mod 8 project sits wholly within the Murray–Darling Basin, a water system already under critical stress. The predicted reduction of baseflows to the Talbragar River will diminish contributions to the Wambuul/Macquarie River and Macquarie Marshes, a cascade of impacts with national ecological significance.

Continued coal mining in this headwater zone jeopardises efforts to recover river health under the Murray–Darling Basin Plan, undermining billions of dollars of public investment in water recovery and wetland protection.

Cumulative Water Pollution and Ecological Risk

For decades, the Ulan complex has contributed to chronic salt pollution and water interception in the Goulburn and Talbragar systems. The Mod 8 proposal continues this trend, extending discharge and disturbance for an additional six years with no clear water management improvements.

There remains no independent monitoring of water quality impacts on The Drip or Goulburn River National Park, despite evidence of cumulative salinity increase and algal growth linked to mine discharges.

Healthy Rivers Dubbo calls for:

- A moratorium on new discharges,
- A comprehensive cumulative water impact study across the three adjacent mines, and
- A catchment-scale water recovery plan prioritising ecosystem and community water security.

Impacts on Aboriginal Cultural Heritage

The area holds extensive Wiradjuri cultural sites, including rock art and occupation shelters that demonstrate continuous connection to Country. The Mod 8 expansion would destroy or damage 71 additional recorded sites, deepening the cumulative loss of heritage across the Upper Goulburn and Talbragar regions.

This erasure of cultural landscapes undermines Aboriginal self-determination and the cultural recovery now underway in the region.

Biodiversity and Landscape Impacts

The expansion would clear an additional 1,743 hectares of native vegetation, including Box Gum Woodland CEEC and sandstone escarpment habitat vital for the Large-eared Pied Bat, Eastern Cave Bat, Regent Honeyeater, and Koala.

Cumulative habitat loss across the Ulan, Wilpinjong, and Moolarben mine sites has pushed several species toward local extinction, yet these impacts remain poorly quantified and unmitigated.

Climate and Transition Considerations

The project would release 105 million tonnes of greenhouse gas emissions, primarily methane from underground seams. Glencore has failed to accurately monitor or report methane emissions, having altered baselines to avoid Federal offset requirements.

This project contradicts NSW's Net Zero by 2050 target and the purpose of the Central West Orana Renewable Energy Zone (CWOREZ), which overlaps the Ulan area. Every additional year of coal mining delays the clean energy transition and worsens climate-driven water insecurity across the Basin.

Social and Economic Implications

The mine will directly undermine 17 private properties, dewater six private bores, and damage local infrastructure through subsidence. Replacement water access is temporary and fails to ensure long-term water security for landholders post-mining.

There is no economic justification for the extension. The region faces severe labour shortages in renewable energy, construction, and land management.

Conclusion

The Ulan Mod 8 proposal represents a major new incursion into the Murray–Darling Basin headwaters. It will:

- Further deplete river and groundwater flows,
- Pollute the Goulburn and Talbragar systems,
- Destroy cultural heritage and wildlife habitat, and
- Undermine NSW's transition to a clean and sustainable future.

Healthy Rivers Dubbo therefore calls on the Department to:

1. Reject the Ulan Coal Mine Mod 8 – Ulan West Continued Operations Project; and
2. Require a new Environmental Impact Statement (EIS) with independent hydrological and ecological assessment of cumulative impacts across the Goulburn, Talbragar, and Wambuul/Macquarie catchments.

Thank you for the opportunity to comment.

Yours sincerely,

Healthy Rivers Dubbo Committee

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