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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 6

Application: SSD-6697-Mod-6

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 pay our respects to Elders past and present and acknowledge that this land was never ceded.

This submission outlines our strong opposition to the Amended Modification 6 for the Ulan Coal Mine. We assert that **this proposal, especially when considered in conjunction with the proposed Modification 8, poses an unacceptable risk to our region's water resources, biodiversity, and cultural heritage, and is incompatible with a safe climate future.**

Cumulative Impacts and the Need for a Holistic Assessment

The current proposal for Modification 6 is inextricably linked to the larger expansion proposed in Modification 8. Together, these modifications would disturb approximately 2,368 hectares of new land and extend mining operations until 2041. Assessing these two functionally inseparable proposals as separate modifications allows for the circumvention of a comprehensive and cumulative impact assessment, which would be required for a new project application. This piecemeal approach

undermines the integrity of the planning process and fails to account for the full environmental and social costs of the mine's expansion.

We strongly urge the Department to assess Modifications 6 and 8 together as a single project to ensure a transparent and robust evaluation of their combined cumulative impacts.

Unacceptable Water Impacts and the Newly Listed Macquarie Marshes Endangered Ecological Community

The most critical concern for Healthy Rivers Dubbo is the project's impact on water resources. The underground mining activities would cause subsidence and land collapse, leading to permanent damage to groundwater systems. This would result in a significant loss of base flows to the Talbragar River, a major tributary of the Macquarie River.

On January 15, 2026, the Australian Government officially listed the wetlands and inner floodplains of the Macquarie Marshes as an Endangered Ecological Community under the Environment Protection and Biodiversity Conservation (EPBC) Act. This listing recognises the immense ecological significance of the Marshes, which are a vital refuge for over 70 species of waterbirds and numerous nationally protected species.

The flows of the Talbragar River are directly connected to the Macquarie Marshes. Any reduction in these flows will have a direct and detrimental impact on this newly protected, internationally significant wetland. The proposed expansion of the Ulan Coal Mine, which will cause further loss of flow to the Talbragar River, is therefore in direct conflict with the conservation objectives of this new listing.

Inadequate Groundwater Modelling

The Federal Independent Expert Scientific Committee has previously expressed a lack of confidence in the groundwater model used to predict the impacts of the Ulan Mine, stating that "modelled predictions of water interception from Ulan Mine have consistently underestimated impacted volumes". The Independent Expert Advisory Panel on Mining (IEAPM) also identified significant deficiencies in the groundwater model and monitoring programs. Glencore's response to these concerns has been inadequate, proposing to monitor damage after it has already occurred,

which is not a sustainable or responsible approach to protecting our precious water resources.

Greenhouse Gas Emissions and Climate Change

Glencore has not provided a transparent and comprehensive assessment of the greenhouse gas emissions associated with this project. The company's assertion that Ulan Mine is a "low emitter" and that there are no feasible measures to reduce fugitive methane emissions is inadequate and does not meet the requirements of the NSW Environmental Planning and Assessment Act.

The failure to properly assess all greenhouse gas emissions, including Scope 3 emissions, is a significant omission, particularly considering the Land and Environment Court's recent rulings emphasizing the need for such assessments. **The proposal will produce an additional 18.8 million tonnes of coal, and when combined with Mod 8, will result in a more than 45% increase in total emissions from the Ulan Mine.** This is unacceptable during a climate crisis.

Irreversible Impacts on Biodiversity

The proposed expansion will have a direct and irreversible impact on threatened species and ecological communities. The proposal will impact the habitat of the Large-eared Pied Bat, Eastern Cave Bat, Powerful Owl, Barking Owl, and Southern Myotis. Furthermore, the cumulative loss of the critically endangered Box Gum Woodland ecological community has not been adequately assessed as a Serious and Irreversible Impact.

First Nations Cultural Heritage

The proposal fails to assess the cumulative loss of significant First Nations cultural heritage in the Ulan area. There is ample evidence of the continuous occupation of this region by the Wiradjuri people and their enduring spiritual connection to Country. The extension of the mine would impact an additional 48 First Nations cultural sites. The cumulative impacts of this and other mining operations in the region on cultural heritage values have not been properly identified or assessed.

The Project is Not Justified

There is no demonstrated need for the extension of coal mining in this region to support local jobs. In fact, the mining industry is competing with the burgeoning renewable energy sector for a skilled workforce, particularly with the development of the Central West Orana Renewable Energy Zone. There are many opportunities to diversify the economy in the Mudgee region.

Conclusion

The Ulan Coal Mine Amended Modification 6 is a deeply flawed proposal that fails to adequately address its significant and irreversible impacts on water resources, biodiversity, cultural heritage, and the climate. The recent listing of the Macquarie Marshes as an Endangered Ecological Community under the EPBC Act adds further weight to the argument that this project should not proceed.

Healthy Rivers Dubbo urges the NSW Department of Planning and Environment to reject this proposal and to prioritise the long-term health of our rivers and the communities and ecosystems that depend on them.

Thank you for the opportunity to comment.

Yours sincerely,

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Convenor

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