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Wednesday 14 December 2022

**Submission of Objection**  
**Ulan Coalmine Modification 6 – underground mining extension**  
**SSD MP08\_0184-Mod-6**

**Introduction**

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

CWEC objects to the proposed extension of underground mining at Ulan Coalmine because the cumulative impacts of existing operations are already too great. The loss of groundwater, loss of biodiversity, loss of Aboriginal cultural heritage and increase in greenhouse gas emissions is already unsustainable.

It is negligible of the NSW Government to approve an extension of coal extraction for an additional 2 years up to 2035 at a time when the global community is striving to reduce global warming.

Ulan Coalmine falls within the Central West Orana Renewable Energy Zone (REZ). It is inconsistent with NSW Government renewable energy targets to continue expanding coal extraction in this region.

Glencore should be turning attention to establishing renewable energy generation on the large mine site. There is opportunity to be an active participant in the REZ with transmission lines passing through mine-owned land.

## **Key Issues:**

### **1. Additional Greenhouse Gas (GHG) emissions**

CWEC objects to the proposal to cause the release of a further 64.97 Mt of GHG through the lifetime of the proposed extension

Another 2 years of mining will add 377,000 t CO<sub>2</sub>-e in Scope 1 and 2 emissions from the Ulan Coalmine. This mine appears to have the 2nd highest Scope 2 emissions of any coal mine in NSW (2nd only to South32's Bulli Seams / Appin mine).

Scope 2 emissions increased - year on year - for the last three years in a row. There is no evidence that renewable energy is being considered or purchased to lower Scope 2 emissions.

Former Chief Scientist of Australia, Professor Penny Sackett in recent expert evidence provided to the NSW IPC has stated:

*"the effects of climate change – which are caused by anthropogenic GHG emissions – are already serious; more than that, they are in fact dangerous. Furthermore, some of these effects are already irreversible and more will become so with even relatively small amounts of additional warming beyond that of 1.5°C, which is already locked in. Every tonne of GHG emission leads to (more) dangerous warming. It is not possible to know which amount, from which source, will precipitate environmental subsystems, including those in NSW, to tip irreversibly. In this context, the Precautionary Principle certainly applies."*<sup>1</sup>

The extension proposal must be rejected on the grounds of Intergenerational Equity.

### **2. Biodiversity impacts**

The proposed mine extension will cause the loss of a further 24.7 ha of remnant woodland and 993.2 ha of additional mine subsidence.

CWEC objects to the further loss of critically endangered Box Gum Woodland and Koala habitat from the region. It is also imperative that all remaining habitat for the critically endangered Regent Honeyeater and Swift Parrot is maintained in the Wollar-Mudgee Important Bird Area.

<sup>1</sup> Dr Penny Sackett, Distinguished Honorary Professor, ANU Institute for Climate, Energy and Disaster Solutions, 14 July 2022, 'Expert Report Regarding the Greenhouse Gas and Climate Implications of the proposed Mt Pleasant Optimisation Project (SSD - 10418)', pg 115

Annual monitoring reports for the vulnerable large-eared pied-bat (*Chalinolobus dwyeri*) have demonstrated a decline in the population over time on the mine site.<sup>2</sup> Further disturbance of irreplaceable cliff line habitat through mine subsidence cannot be justified.

The cumulative impact on biodiversity from coal mining operations in the region has not been adequately assessed and cannot be offset. Increasing pressure on threatened species habitat within Goulburn River National Park and Munghorn Gap Nature Reserve has not been investigated.

The extension proposal must be rejected on the grounds of increasing native species extinction rates in Australia.

### **3. Water source impacts**

Ulan Coalmine has had a significant cumulative impact on the integrity of regional groundwater sources and base flows to the easterly flowing Goulburn River and the westerly flowing Talbragar River. Additional drawdown with impacts of up to 3,000 years on neighbouring bores is irresponsible and denies opportunities for future generations to have access to water in a drying climate.

CWEC objects to the misinformation provided in the assessment report regarding the significant groundwater dependent ecosystem (GDE) known as 'The Drip.' There is evidence that the GDE is connected to the regional groundwater source and not just to a perched aquifer.

The report also does not identify that the regional groundwater source has a predominantly easterly flow direction.

It is not clear that adequate water licences have been gained to cover additional drawdown of the NSW Murray Darling Basin Porous Rock Groundwater Sources 2020 - Sydney Basin MDB.

The assessment report predicts an additional drawdown of up to 8,339 ML/yr from this water source. It is also not clear that some of this impact could be on base flows to the Goulburn River.

The assessment of cumulative impacts of Ulan Coalmine on regional water sources is deficient and cannot be used to make an informed decision on the proposed extension of mine impacts.

### **4. Other cumulative impacts**

There is a huge loss of and threat to Aboriginal cultural heritage across the region.

<sup>2</sup> Fly by Night Bat Surveys Pty Ltd, 2019. *Microbat Monitoring of the Ulan Coal Mine Lease for 2019*

The impact of three adjacent large mining operations has had a significant impact on the many important sites indicating Aboriginal occupation and spiritual connection to the Goulburn River valley.

The impact of subsidence on important rock shelters and disturbance of the landscape in general has caused a major disruption to the connection to country for traditional owners. This enormous loss of cultural value has not been recognised and cannot continue.

Cumulative social impacts from mining include loss of community through ongoing property acquisition, large volumes of traffic on local roads, large number of train movements plus noise and dust from coal handling infrastructure.

### **Conclusion**

CWEC strongly objects to an extension of Ulan Coalmine operations. The costs of the project far outweigh any benefits, particularly in regard to increasing costs of extreme weather events caused by coal driven climate change.

Your sincerely

A handwritten signature in cursive script that reads "Cilla Kinross". The signature is written in black ink on a light-colored, slightly textured background.

Cilla Kinross  
On behalf of CWEC