



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Tuesday October 23rd, 2018

Referrals Gateway
Assessments and Governance Branch
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

email [REDACTED]

cc: ipcn@ipcn.nsw.gov.au

Dear Sir/Madam,

Bylong Coal Project – your reference 2014/7133

This mine proposal is deemed a controlled action because of groundwater impacts and impacts on nationally endangered threatened species. On further consideration it is possible that listed World Heritage values of the Greater Blue Mountains World Heritage Area are impacted by this proposal due to a depletion of groundwater and the contingent wildlife habitat changes arising from it.

The Colong Foundation requests that the Bylong Coal Project be further listed as a controlled action due to potential impacts on listed World Heritage values. Indeed KEPCO has acknowledged alteration of groundwater due to drawdown effects caused by proposed mining.

Drawdown of groundwater may lead to important plant species, including threatened species, in the World Heritage Area being affected. Rare and threatened plants continue to be found in this part of Wollemi National Park.

This World Heritage Area that must not be further impacted by coal mining. Damage arising by past approvals must not be repeated here. It is unacceptable that the 2015 consent for mining at South Bates extension of the Wambo coal mine will cause cliff instability within the World Heritage Area. This potential damage indicates I have been deficient my duty towards World Heritage. The Colong Foundation accepts it should have challenged this Wambo mine extension at the development consent stage and hopes something can be done to shorten the offending longwall panels.

The acknowledgement of potential impacts to groundwater by KEPCO requires further consideration of impacts to World Heritage values and to the property itself, such as loss of groundwater in remote gully areas.

The Colong Foundation understands that the Regional Groundwater Modelling commissioned by the Department of Environment and Energy found that almost all of the 137 square kilometres of hydrological change is due to new coal mining is due to the proposed Bylong coal project.

I have walked in the affected area. It is called the Bylong Labyrinth. I confirm that there is a strong influence between shallow groundwater levels on the occurrence of plant communities in this area.

If groundwater levels were to drop, perhaps even slightly, then wet forest areas in gullies may disappear, along with unusual plant species found there, including perhaps some awaiting discovery. The difference in vegetation between cypress pines and spinifex-like vegetation of the ridges and moist forests in narrow gullies cannot be more marked. These differences indicate a delicate balance of vegetation types entirely dependent upon groundwater.

Water also controls the presence of fauna and birds some of which depend heavily on flowering streamside vegetation for sustenance. Groundwater losses can affect the entire ecosystem. Water is life is not just a saying. Spend a thirsty night on a ridgetop without knowing where your next water is, and you will understand something of the water problems that daily confront migratory birds in central western NSW.

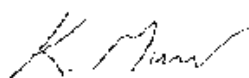
The number of coal mining impacts accumulating on the Greater Blue Mountains World Heritage Area is alarming. The Bylong proposal is just the last in this series. The Clarence Colliery, Springvale, Angus Place, Tahmoor and Wambo mines have approvals that impact on this property. No new mining approvals should impact on the property. Further groundwater impacts must be prevented at the proposed Bylong mine as Australia must respect the World Heritage treaty it signed.

I would like to conclude this submission with some remarks in regard to noise assessment for the Bylong mine proposal in relation to recreation. Any artificial noise intruding into a natural area compromises recreation experience. The noise assessment, its underpinning thinking, threshold values and consideration do not consider the wilderness-style recreation use of the area. To climb a challenging peak and have a high camp spoilt by intrusive noise turns that deeply moving experience into a horror where you feel there is no escape from artificial noise. You feel like a prisoner without walls where there is no escape, anywhere.

The noise experts and regulators have incorrectly applied noise thinking relevant perhaps to coastal camp ground to remote area national park recreation. The entire noise analysis as it applies to the World Heritage Area is erroneous and misleading. It is one where the main consideration is establishment of practical values that can be met without unusual effort, not consideration of actual impacts on real users. Noise pollution licencing is one matter, impact assessment is another. If licencing requirements dictate assessment, then decision makers are misinformed on the matters for consideration. This is just one example of common impact assessment approach that bedevils various aspects of mining proposal determination.

Thank you for this opportunity to comment and together I hope Australia can uphold the currency of World Heritage listing.

Sincerely,



Keith Muir
Director
The Colong Foundation for Wilderness Ltd
[REDACTED], Sydney 2000
emai [REDACTED]