

26 October 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, reference 2014/7133

The National Parks Association of NSW (NPA) welcomes recognition of the adverse potential impacts on World Heritage listed Wollemi National Park by the proposed KEPCO coal project as a matter warranting consideration as a controlled action in accordance with the provisions of the Environment Protection and Biodiversity Conservation (EPBC) legislation.

NPA, established over sixty years ago, is the leading community organisation concerned to promote the establishment, protection and best practice management of high conservation value areas in NSW and beyond. NPA supports the role of the World Heritage Convention, to which Australia is a signatory, as an important tool in keeping with these objectives.

NPA notes that World Heritage listing of the Blue Mountains National Park complex, which includes Wollemi, demonstrates international recognition of its important values and that Australia has a responsibility to protect these values. Accordingly, NPA is deeply concerned by actions and developments that are predicted to undermine the intrinsic values and integrity of Wollemi National Park.

We therefore call on the Minister to reject the Bylong Coal Project as proposed by KEPCO Bylong Australia to develop a coal mine in the Bylong Valley, northeast of Mudgee.

In making this call, NPA draws attention most particularly to concerns regarding:

1 Hydrological impact

Coal mining has been demonstrated to affect the natural water regime in an area as sodden coal deposits are extracted and dewatered. Drawdown of natural surface waters and subsurface aquifers, affecting groundwater dependent ecosystems and surface habitats, is incompatible with protection of World Heritage values. Disposal of dewatered effluent loaded with salts and other pollutants is similarly unacceptable.

It is noted that the Bioregional Assessment for the Hunter subregion identified potential drawdown of [REDACTED] that could affect 137 square kilometres of the identified World Heritage area.

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2 Pollution and disturbance from sound, air quality, light and human intrusion.

Air quality, light pollution and noise from the active Bylong Coal Project site will inevitably affect the adjacent World Heritage areas directly to a greater or lesser extent, in part depending on the prevailing wind and weather conditions. The intrusion of a major mechanised activity and workforce adjacent to the National Park also has carries a change of likely human intrusion that risks detrimental effects on the protected area World Heritage values of the Wollemi National Park.

3 Overall reduction of fossil fuel emissions

The urgent need to reduce, rather than increase, mobilisation of fossil fuels – including through mining of coal for power generation – is imperative. Activities and works that enable more greenhouse gas emissions increases the global threat of climate change temperature changes and weather instability. This impinges on the long-term sustainability of World Heritage value protection world wide, as well as other important values addressed by international conventions to which Australia is a signatory. At a local level, unfortunately the Blue Mountains World Heritage area has already been subject to the number of adverse impacts from coal mining around its perimeter, such as water drawdown at Thirlmere Lakes; pollution from Clarence and Springvale mines; and subsidence risks from the Wambo coal mine near Singleton. Yet another new coal mining venture is the last thing needed in terms of upholding World Heritage values.

Yours faithfully

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Anne Dickson

**President
National Parks Association of NSW**