



ADVISORY COMMITTEE

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Mr Gordon Kirkby
Chair
Independent Planning Commission Panel
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Via email: ipcn@ipcn.nsw.gov.au

Dear Mr Kirkby

Bylong Coal Project

The Advisory Committee for the Greater Blue Mountains Area World Heritage Area (GBMWAH) is jointly appointed by the NSW and Commonwealth environment ministers to provide advice on the protection, conservation, presentation and management of the GBMWAH and issues concerning surrounding land uses that have the potential to impact on the area.

World Heritage listing is the highest level of international recognition that may be afforded to an area, acknowledging its outstanding universal values and global significance. The GBMWAH contains outstanding examples of ongoing ecological and biological processes significant in the evolution of Australia's highly diverse ecosystems and communities of plants and animals, and significant natural habitats for the in situ conservation of biodiversity, including the eucalypts and eucalypt dominated communities and many rare and threatened plants and animals.

The Advisory Committee is concerned that developments, both within and on lands adjacent to the GBMWAH, should not impact detrimentally on these World Heritage values.

The Bylong Coal Project adjoins the Wollemi National Park which is part of the (GBMWAH). The proponent is KEPCO Bylong Australia Pty Ltd and involves a proposal for both underground and open cut methods for 25 years.

The Committee is aware of new information regarding the potential impacts of the Bylong mine on the values of the GBMWAH. The Bioregional Assessment for the Hunter sub-region, the found that 'There are 137 km² of the Greater Blue Mountains Area World Heritage Area within the zone of potential hydrological change in the Hunter subregion' from new mining proposals. The relevant map from the Bioregional Assessment (page 207) identifies a large area of the GBMWAH adjoining the eastern edge of the Bylong project as potentially experiencing hydrological change.

The Bioregional Assessment identified that Wollemi National Park is an asset that is “more at risk of hydrological changes” (Impact and Risk Analysis page 186) which is defined as “those assets associated with higher probabilities of larger hydrological changes”. The “zone of potential hydrological change” identified in the Bioregional Assessment combines “the area with at least a 5% chance of exceeding 0.2 m drawdown due to additional coal resource development, and the area with at least a 5% chance of exceeding changes in specified surface water characteristics that arise due to additional coal resource development.” (Section 5 Outcome Synthesis).

An examination of the detailed vegetation mapping for the *Native Vegetation of Northwest Wollemi National Park and Surrounds* (2012) suggests three native vegetation communities in the identified area within the GBMWHa which could potentially be negatively impacted by lowering water tables: River Oak Forest (S_FoW13), Western Hunter Flats Rough-barked Apple Forest (S_FoW19) and Hunter Range Grey Myrtle Layered Forest (S_RF13). The potential for lowering water tables to negatively affect other vegetation communities should not be discounted. The potential for such negative impacts upon the natural values of the GBMWHa to occur should be fully considered in the Bylong Coal Project proposal.

The loss of fauna habitat, particularly grassy woodland and remnant trees on relatively fertile soils, adjacent to the GBMWHa will impact negatively on the biodiversity (listed values) within the GBMWHa as well as on the site. Fauna from the adjacent GBMWHa would be dependent in part on these limited fertile habitats eg use seasonal food resources. Genetic exchange between birds within and adjacent to the GBMWHa would be important if populations within the GBMWHa are to be maintained and also not to become inbred. There are currently 33 threatened bird species recorded in the GBMWHa, 15 of these were recorded in the mine study area during the EIS (the Dusky Woodswallow has been listed as threatened since the EIS was prepared). Other threatened species in the GBMWHa eg Varied Sittella most likely also occur on the site. This last dry year has been a very bad year for the critically endangered Regent Honeyeater. These threatened species are not adequately conserved in Wollemi NP or the GBMWHa. The populations in adjacent fertile areas need to be maintained if the species are to persist in the GBMWHa. Other species eg Koala, Common Brushtail Possum are most common on the fringes of the GBMWHa where they range into more fertile adjacent agricultural land.

The Committee is overall concerned about the impacts of the long wall mining which is proposed to be immediately adjacent to boundaries of Goulburn River National Park and Wollemi National Park, as well as directly impacting native vegetation in Bylong State Forest which is part of an important connecting wildlife corridor. In addition, the development will result in more greenhouse gases (regardless of whether coal is burned in Australia or Korea and whether it is or is not counted as part of Australia's emissions). The listed biodiversity values of the GBMWHa are obviously threatened by climate change.

If you require further information, please contact our Executive Officer, Jacqueline Reid via email to jacqueline.reid@environment.nsw.gov.au or by telephone to 0419 307 099.

Yours sincerely,



Bruce Leaver
Chair
Greater Blue Mountains World Heritage Area Advisory Committee

5 November 2018