

9 March 2016



Hunter Branch

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Development Assessment Systems & Approvals,
NSW Dept of Planning and Environment
GPO Box 39
Sydney NSW 2001

Lodged at: <<http://majorprojects.planning.nsw.gov.au>>

Dear Sir/ Madam

WILPINJONG MINE EXTENSION PROJECT SSD 6764

The Hunter Branch of the National Parks Association of NSW (NPA) strongly objects to the Wilpinjong Continuation Project (SSD 6464). NPA is a non-profit community organisation with a particular interest in the protection of the State's biodiversity and its supporting ecological processes.

The project will involve the clearing of 354 ha of remnant native vegetation comprising dry sclerophyll forests and grassy woodlands in moderate to good condition. This includes three listed threatened ecological communities, as well as habitat for 21 listed threatened species, comprising 13 birds, seven bats and one plant. The area is a hotspot for breeding and feeding by the critically endangered Regent Honeyeater, whilst the adjacent Munghorn Gap NR is important for many ornithological records.

A significant feature of the project is expansion of the existing mine footprint immediately adjacent to, and in many cases, by way of narrow fingers fully enclosed within the indented boundaries of Munghorn Gap NR. The stated rationale for this is to 'maximise the recovery of economically viable coal resources' (EIS page 6-24). However, no consideration has been given to the severe impact that this has on the purpose and values of Munghorn Gap NR. The statement on page 4-83 of the EIS that 'The Project would not directly impact the Munghorn Gap Nature Reserve' beggars belief, and falls well short of the standard of competence expected in a major project EIS.

Munghorn Gap NR is a nature reserve set aside under Part 4 of (NSW) *National Parks and Wildlife Act 1974* to promote the following purposes and management principles:

- (1) The purpose of reserving land as a nature reserve is to identify, protect and conserve areas containing outstanding, unique or representative ecosystems, species, communities or natural phenomena so as to enable those areas to be managed in accordance with subsection (2).
- (2) A nature reserve is to be managed in accordance with the following principles:
 - (a) the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena,
 - (b) the conservation of places, objects, features and landscapes of cultural value,
 - (c) the promotion of public appreciation, enjoyment and understanding of the nature reserve's natural and cultural values,
 - (d) provision for appropriate research and monitoring,

It is difficult to see how 24-hour open cut mining undertaken immediately adjacent to a gazetted nature reserve could not create conflicts with a wide variety of the matters listed above. For this reason, existing approvals relating to the Wilpinjong Mine expressly set aside buffer zones to reduce impacts on Munghorn Gap NR. The current proposal seeks to completely remove these buffer zones. We strongly object to this erosion of existing protection measures. The effect of the project will be to substantially degrade the integrity and conservation values of some of the State's outstanding natural areas.

There has been no assessment of the impacts of fly rock, blast vibration, dust, noise and night-time light emissions on Munghorn Gap NR and its fauna. We do not support the proposal to modify the existing consent conditions so that noise limits in Munghorn Gap NR and Goulburn River NP are only applicable at designated visitor sites. Our organisation conducts outdoor activities within these reserves from time to time, which typically are not confined to 'designated visitor sites'. Similarly, we submit that the assessment of visual impact is flawed, as both Munghorn Gap NR and Goulburn River NP were not treated as 'relevant viewpoints'. Impacts on fire management have also not been considered.

The effect of the proposal is a substantial and cumulative devaluation of the immediate setting and ecological context of the Munghorn Gap NR and Goulburn River NP. This has not been reflected in the economic evaluation of costs and benefits resulting from the project, which assumes that the adjoining reserves have no economic value. This represents a failure to place appropriate values and prices on environmental resources, as required under the principles of ecologically sustainable development.

Yours faithfully



Ian Donovan
President, Hunter Branch
National Parks Association of NSW