NATIONAL PARKS ASSOCIATION OF NSW
protecting nature through community action

PROPOSAL: THE WILPINJONG COAL MINE EXTENSION PROJECT SSD 6764.

SUBMISSION BY THE NATIONAL PARKS ASSOCIATION OF NSW

SUMMARY OF OBJECTION

The National Parks Association principally objects to the proposed extension to the Wilpinjong open cut coal mine due to the adverse impacts on the natural and cultural values of the Munghorn Gap Nature Reserve, the Goulburn River National Park and the loss of connectivity between the reserves. In addition, use of coal from this mine will result in significant CO_2 emissions.

BACKGROUND

The National Parks Association of NSW (NPA) was formed in 1957 to promote the concept of a network of national parks in NSW legislated through a National Parks and Wildlife Act and managed by a professional National Parks and Wildlife Service. A major step forward in the Association's work was achieved with the passage of the NSW National Parks and Wildlife Act and the establishment of the NSW National Parks and Wildlife Service (NPWS) in 1967.

Today NPA continues to build on this work through a network of branches and over 20,000 members and supporters.

A key objective of NPA is to ensure that management of areas secured for nature conservation maintains their natural values and restores degraded areas to provide for ecological processes to be maintained in perpetuity. NPA is also working to achieve improved management of nature across the landscape including improving connectivity between reserves.

THE VALUES OF MUNGHORN GAP NATURE RESERVE AND GOULBURN RIVER NATIONAL PARK.

The values of these protected areas are well set out in the adopted Plan of Management.

The importance of Goulburn River National Park and Munghorn Gap Nature Reserve in a regional context is outlined under section 2.3.2 on the Geographic and Geomorphic Setting.

> *"The establishment of Goulburn River National Park was a major step in the development of a system of protected areas that conserves the remarkable sandstone central tablelands of NSW and extends north from the Wollondilly River to the Goulburn River and Munghorn Gap. This system of protected areas includes the large Kanangra-Boyd, Blue Mountains, Yengo and Wollemi National Parks and Gap Nature Reserve. These reserves provide corridors between the major botanical divisions of the Central Western Slopes, the Central Tablelands, the North Coast and the Central Coast.*
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> *Goulburn River National Park and Munghorn Gap Nature Reserve lie within the Central Goulburn River group of land systems, one of eight such groups identified by the Commonwealth Scientific and Industrial Research Organisation (CSIRO) in a report to the Hunter Valley Research Foundation in 1963. The Central Goulburn Valley group of land systems, of which Goulburn River National Park occupies a large proportion, is totally dominated by the major geographical feature of the Upper Hunter Valley: the Goulburn River and its headwaters.*

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Munghorn Gap Nature Reserve lies in the headwaters of Cumbo, Wilpinjong and Moolarben Creeks, which are three tributaries of the Upper Goulburn River. Its southern margins are drained by Cooyal Creek which flows into the Talbragar River, part of the Murray-Darling Basin of inland Eastern Australia. Thus, Munghorn Gap straddles the watershed between the coastal eastward-flowing streams and the inland westward-flowing streams."

Subsequent sections of the Plan of Management document specify natural, cultural and historic values of these reserves.

The intervening Wilpinjong Valley retains remnant habitat links within the predominantly rural landscape and thus provides an important element of biological connectivity between the two protected areas.

SPECIFIC OBJECTIONS

The NPA objects to the proposed Peabody Energy Wilpinjong open cut Mine Extension on the following grounds:

1 expansion of extraction and mobilisation of fossil fuels resulting in release of additional greenhouse gases so contributing to further climate change impacts with consequent adverse impacts on the natural environment globally and locally. It is noted that the environmental impact studies indicate some 20 million tonnes of greenhouse gas p/a will be released should this extension go ahead.

2 the adverse impact on the integrity of Munghorn Gap Nature Reserve and Goulburn River National Park. The impacts, in perpetuity and during the course of mining operations, are not adequately addressed in the Environmental Impact Studies. The impacts of the 24/7 mining operation include dust, flyrock, blast vibration, light and noise. Munghorn Gap Nature Reserve in particular will be directly affected by removal of the buffer zones on the northern side identified in the original mining proposal. Additionally permanent removal of protective vegetation will increase air movement resulting in drying above and below ground level, effectively shrinking the nature reserve. Accordingly, NPA questions the statement that '*the approved Wilpinjong Coal Mine successfully operates in close proximity to the Munghorn Gap Nature Reserve.'* (EIS Main Report p 6 - 24) or that '*The Project would not directly impact the Munghorn Gap Nature Reserve.'* (p 4-83) in the absence of supporting evidence.

3 the adverse hydrological impacts have not been adequately addressed. The creation of new permanent deep voids has potential implications for the water regime through the valley and downstream. Specifically, the permanent drainage modification along the northern side of Munghorn Gap Nature Reserve will exacerbate the drying effects of exposure referred to above.

4 permanent obliteration of the current valley landscape will profoundly affect the important biological and visual linkage between Munghorn Gap Nature Reserve and Goulburn River National Park. The proposal will clear 354 ha of remnant vegetation including areas directly adjacent to Munghorn Gap NR. These contain three Endangered Ecological Communities (EECs) and habitat for 20 threatened fauna species including the critically endangered Regent Honeyeater and one threatened plant listed under the EPBC Act.

5 the proposed biodiversity offsets fail to mitigate the long-term implications of removal of existing vegetation. These offset parcels include important elements of remnant vegetation and habitat for wildlife. The area is a known hotspot for Regent Honeyeater breeding and feeding yet the proposed offsets fail to meet requirements to compensate for loss of core Regent Honeyeater

habitat. It is noted that some of the proposed 'offsets' would appear to be cleared pasture including 'improved' pasture.

6 the EIS fails to consider the adverse implications on the unique biophysical values of the area which underpin current and potential social and economic wellbeing for the long term.

7 the EIS fails to consider the declines in the number of local residents, resulting from the impacts of the mine which will reduce the viability of emergency service volunteers so crucial to bushfire management in rural areas.

CONCLUSION

The National Parks Association urges that the proposed extension be rejected due to the extent of permanent adverse environmental impacts that cannot be mitigated.

10 March 2016