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Via online submission: <https://www.planningportal.nsw.gov.au/hawkins-rumker>

**Preliminary Regional Issues Assessment Hawkins Rumker**

I am writing to indicate my objection to the granting of any new coal exploration and mining leases at a time when our society must be doing everything possible to mitigate climate change impacts; new coal mines are completely incompatible with this most critically important goal.

I wish to express my concern in relation to potential negative impacts of coal mining in the proposed Rumker and Hawkins lease areas north and northeast of Rylstone, proposed for release for coal exploration and mining under the Strategic Release Framework; these areas are directly adjacent to Wollemi National Park, part of the Greater Blue Mountains Area World Heritage Property (GBMA), and include ecosystems contiguous with the GBMA. Coal mining adjacent to the GBMA poses a threat to the World Heritage values of this Property.

The threat to aquatic ecosystems in the area, particularly groundwater dependent ecosystems, is exemplified in the now well-documented, catastrophic impacts of underground longwall coal extraction on the nearby Newnes Plateau Shrub Swamps (NPSS), listed as an Endangered Ecological Community under the NSW *Biodiversity Conservation Act 2016*, and part of the Commonwealth Temperate Highland Peat Swamps on Sandstone (THPSS) Endangered Ecological Community (*EPBC Act* *1999*). Baird and Benson (2020)[[1]](#footnote-1) reported “*increasing evidence of the lowering and loss of water tables in undermined NPSS swamps and resulting impacts on groundwater-dependent flora and fauna*.” They noted that following the 2019 bushfires, “*observations of the impact of the longwall mining-related lowering of water-tables and subsequent fire impacts in these swamps provides dramatic evidence of the irreversible damaging impacts of longwall mining. Unlike the reference swamps, the undermined swamps failed to respond to good rains since January 2020, with almost no resprouting of typical and often long-lived, resprouter sedgeland and shrub species…. the dead swamps provide clear evidence of the impacts of longwall mining*.” The loss of groundwater on groundwater-dependent fauna species at the western edge of their distributions, such as the Endangered Blue Mountains Water Skink (*Eulamprus leuraensis*) and Endangered Giant Dragonfly (*Petalura gigantea*), has resulted in, or is expected (based on current monitoring trajectories) to result in extirpation of all populations of these species in undermined swamps1.

The Rumker and Hawkins strategic coal exploration areas include all of the upper Cox’s Creek, Breakfast Creek and Reedy Creek catchments. The significant biodiversity values of the endangered and unique montane peat swamps in the upper Cudgegong River catchment east of Rylstone (including Cox’s Creek), have previously been highlighted[[2]](#footnote-2),[[3]](#footnote-3). These peat swamp ecosystems form part of the Montane Peatlands and Swamps in NSW Endangered Ecological Community (NSW *Biodiversity Conservation Act 2016*) and although not specifically identified as such, will form part of the THPSS Endangered Ecological Community. Due to their high biodiversity values, some of these areas (e.g., Coricudgy State Forest and its significant montane peat swamps), have been proposed for addition to the GBMA[[4]](#footnote-4).

In view of the extensive evidence of the destructive impact of longwall coal mining on the Endangered NPSS1,[[5]](#footnote-5) and well documented damage to watercourses and Coastal Upland Swamps of the Woronora Plateau south of Sydney, the potential for irreversible damage and destruction of these regionally important and poorly documented, groundwater dependent peat-swamp ecosystems along Cox’s Creek and in the upper Lawson Creek catchment along Breakfast Creek and Reedy Creek, and rare spring ecosystems such as around Bald Mountain[[6]](#footnote-6),[[7]](#footnote-7), is extremely high. There is also a high risk of negative impacts on stream hydrology, biodiversity, and ecology across the area, including into the GBMA.

The potential for threatened species, e.g., the Endangered Giant Dragonfly, to be present in parts of these ecosystems is also high2,3. The 2017 description of a recently discovered new species of giant spiny crayfish in headwater streams draining Mt Coricudgy in nearby Coricudgy State Forest[[8]](#footnote-8) highlights the potential for rare, threatened, and as yet undiscovered aquatic species to be present elsewhere in the proposed lease areas. McCormack and Ahyong (2017) suggested this species qualified for listing as Critically Endangered. The occurrence of isolated populations of the rare mallee, *Eucalyptus camphora* subsp. *camphora*, in and around swamps in the proposed lease areas, further highlights the biodiversity values of this area and the threat associated with any lowering of water tables associated with coal mining.

The World Heritage Committee is unambiguous in stating that mineral exploration or exploitation is incompatible with World Heritage status. The World Heritage Committee’s decision in 2019 (43 COM 7B.2[[9]](#footnote-9)) “*notes with concern that several mining projects exist in the vicinity of or adjacent to the property, and that some mining activities have resulted in impacts on the property, as evidenced by the incident at the Clarence Colliery, and also requests the State Party to undertake an assessment of potential cumulative impacts of all existing and planned mining projects in the vicinity of the property through a Strategic Environmental Assessment (SEA) or a similar mechanism*”.

CSIRO has been contracted by the Department of Agriculture, Water and the Environment, to conduct the Greater Blue Mountains Area Cumulative Impact Assessment project which aims to identify risk to the Outstanding Universal Value of the GBMA from mining and analyse the protection and management arrangements. The outcomes of the CSIRO cumulative impact assessment project, which is currently being finalised, may have models that will assist with assessing potential impacts to the GBMA. We recommend the model be used should a Preliminary Regional Issues Assessment, as described in the Strategic Release Process, be determined.

Yours sincerely,

Ian Baird

1. Baird, I.R.C. and Benson, D. (2020). Serious impacts of longwall coalmining on endangered Newnes Plateau Shrub Swamps, exposed by the December 2019 bushfires. *Australasian Plant Conservation* **29**(1):12-15. [↑](#footnote-ref-1)
2. Baird, I.R.C. & Benson, D. (2017). *Survey and estimation of biodiversity values in relation to National Heritage listing for Rollen Creek swamp, Coricudgy State Forest, Central Tablelands, NSW*. Unpublished report. Available from https://doi.org/10.13140/RG.2.2.24271.48800. [↑](#footnote-ref-2)
3. Baird, I.R.C. & Benson, D. (2018). *Hydrogeomorphology, floristics, classification, and conservation values of the little-known montane mires of the upper Cudgegong River catchment, Central Tablelands, New South Wales*. *Cunninghamia*, 18, 001-021. [↑](#footnote-ref-3)
4. Benson, D. & Smith, J. (2015). Protecting biodiversity values in response to long-term impacts: additional areas

   recommended for inclusion in the Greater Blue Mountains World Heritage Area. In: *Values for a new generation:*

   *Greater Blue Mountains World Heritage Area* (ed Benson, D.) pp. 48-75: Greater Blue Mountains World Heritage

   Area Advisory Committee. Available from

   <http://www.environment.nsw.gov.au/protectedareas/values-new-generation.htm> [↑](#footnote-ref-4)
5. Keith, D.A., Benson, D., Krogh, M., Watts, L., Simpson, C.C., Baird, I., Mason, T. L., (2021) *Newnes Plateau Shrub Swamps: Monitoring responses to the 2019-2020 bushfires and interactions with other threatening processes*. Update Report March 2021. Centre for Ecosystem Science, University of NSW, Sydney. [↑](#footnote-ref-5)
6. Lillis, S. (2002). Cudgegong River & Tributary Vegetation Mapping Project. Report prepared for The Cudgegong

   Catchment Committee (s.355 committee of Rylstone Shire Council) August 2002. Sj Landscape Constructions,

   Wollar, NSW. [↑](#footnote-ref-6)
7. Lillis, S. (2003). Lawsons Creek Vegetation Mapping Project. Report prepared for the Cudgegong Catchment

   Committee (s.355 committee of Rylstone Shire Council) November 2003. Sj Landscape Constructions,

   Wollar, NSW. [↑](#footnote-ref-7)
8. McCormack, R.B. & Ahyong, S.T. (2017). *Euastacus vesper* sp. nov., a new giant spiny crayfish (Crustacea,

   Decapoda, Parastacidae) from the Great Dividing Range, New South Wales, Australia. *Zootaxa*, 4244, 556-567.

   doi:10.11646/zootaxa.4244.4.6 [↑](#footnote-ref-8)
9. https://whc.unesco.org/en/decisions/7430/  
    [↑](#footnote-ref-9)