



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601

18 December 2014

Dear Sir/Madam,

Reference: 2014/7391

Western Sydney Airport Referral of proposed action – December 2014
(Environment Protection and Biodiversity Conservation Act (EPBC Act))

Preface

Founded in 1961, the Blue Mountains Conservation Society is a community based volunteer organisation with about 800 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains and to increase awareness of the natural environment in general.

The Referral document (p.18) states that –

“A significant impact on the World Heritage values of the Greater Blue Mountains Area is not considered likely.”

The Society strongly disagrees with this conclusion, and believes that the Western Sydney Airport and its attendant infrastructure and associated industries poses a very real threat to the GBMWhA. And as a result, the Airport is a threat to the Blue Mountains communities, tourism and businesses.

The only way that the airport should proceed is for an Environmental Impact Statement (EIS) to clearly show that there is no adverse impact on the GBMWhA. In addition, constraints and controls must be put in place to avoid an impact in the future.

The EPBC Act applies to ‘controlled actions’. A person who wishes to carry out a controlled action must first obtain an approval from the Environment Minister.

A controlled action is an action which is likely to have a significant impact on –

- a matter of national environmental significance, or
- Commonwealth land.

The extensive Referral documents are concerned with the Commonwealth-owned Land at Badgerys Creek, and concludes (p.65) by stating –

“The proposed action is likely to have a significant impact on the environment of Commonwealth-owned land at Badgerys Creek and on areas adjoining the site.”

The Society's submission is concerned with a matter of national environmental significance – the threat to the Greater Blue Mountains World Heritage Area (GBMWhA).

The Referral

The Referral was issued on 4th December. The Act allows 10 business days for public comment, and no such opportunity in the following 20 business days when the Environment Minister makes his decision.

The Referral documentation is over 550 pages and is highly technical in places . Technical in several disciplines, including law, botany, geology, history and zoology.

It is not possible to read, digest, discuss and comment on such a document in two weeks.

It is therefore the considered view on the Society that the Minister requires a broader impartial view that a well initiated, resourced and managed EIS would provide.

Western Sydney Airport

The environmental footprint of a major airport is huge – and the impact of the one being proposed at Badgerys Creek with its 24 hour operation and increasing capacity is enormous.

And it isn't just the impact in the immediate vicinity of the airport, as flightpaths (including approach and departure heights and aircraft types and frequency), as well as emergency incidents and accidents, have the potential of severely impacting the GBMWhA.

The airports are permanent; their impact is permanent – so it is imperative that any potential impact is fully investigated and addressed.

Greater Blue Mountains World Heritage Area

In 2000, the Greater Blue Mountains was inscribed on the World Heritage list due to its bio-diversity.

Its bio-diversity reads like a manifest from Noah's Ark. Its species include -

- over 1,500 flora species
- 52 mammals
- 63 reptiles
- over 30 frogs
- a third (265 species) of Australia's bird species,
- 120 butterfly and 4,000 moth species.

However, it's the 90 Eucalypt species that have pride of place made possible by the "*wide and balanced representation of eucalypt habitats including wet and dry sclerophyll forests and mallee heathlands, as well as localised swamps, wetlands and grassland.*"

The GBMWhA supports many plants of conservation significance including 114 endemic species and 177 threatened species. (source: *UNESCO GBMWhA inscription - whc.unesco.org/en/list/917*]

The GBMWhA's vastness and landscape helps conceal and protect its diversity. That is, it contains a myriad of different ecosystems many of which are inaccessible by foot to all but the most experienced and intrepid adventurer.

The discovery of the Wollemi Pine in 1994 bears testament to that – as does the all too frequent lost bushwalker.

Half of the GBMWhA is declared wilderness. It also provides much of the water catchment for Warragamba Dam – Sydney's main water supply

These ecosystems are fragile and the flora and fauna sensitive to change.

GBMWhA Communities & Tourism

In the year ending September 2014, the Blue Mountains received over 850,000 overnight visitors and nearly 2.3 million daytrip visitors. (*source: Tourism Research Australia*)

Just as Blue Mountains businesses are geared towards tourism, many Blue Mountains residents live there due to the environment.

Impacts

The Referral document (p.18) states that *“A significant impact on the World Heritage values of the Greater Blue Mountains Area is not considered likely.”*

The possibility of a significant impact irrespective how unlikely bears investigation, consideration and amelioration.

A cursory reading of the Referral reveals that no studies that included the GBMWhA were conducted, rather the Biodiversity Report was of Commonwealth-owned Land at Badgerys Creek. Mention was made of studies up to 10 kilometres away. As the GBMWhA is 8 kilometres from the proposed airport, only a miniscule portion of the GBMWhA is included.

Although existing material was used in preparing the Referral, it would appear that only a single field study was conducted – this was in September 2014.

The principal impact on the GBMWhA and Blue Mountains communities of the proposed Western Sydney Airport is aircraft noise.

Aircraft noise is incongruent with natural ecosystems. While natural ecosystems may have their own noise – sometimes inherent (like a waterfall); sometimes occasional (like a storm) – they have evolved over millennia to have this as part of the ecosystem.

Unfortunately, the Referral’s Biodiversity Report (p.72) only looks at the immediate Badgerys Creek area and fails to include the 265 bird species in the GBMWhA – and whether they are threatened or migratory species. The report states -

“The results of the 10 kilometre database searches included numerous migratory species. Many of these species have not been considered in this biodiversity report due to the unsuitable nature of this terrestrial environment to provide any necessary habitat requirements.”

As mentioned above, 265 Australian bird species can be found in the GBMWhA – 111 (42%) of these are migratory or nomadic. A list of these is included as Appendix A. The number is probably higher as this list was compiled on short notice. (*source: Carol Proberts, Immediate Past President, Blue Mountains Bird Observers*)

Some comments on this list.

- a. The Swift Parrot is nationally Endangered, breeds in Tasmania, migrates to mainland in winter. In some years uses Hawkesbury region and eastern Blue Mountains as winter feeding grounds.
- b. The Yellow-faced Honeyeater. Though not threatened, they move through the area in huge numbers every autumn and spring and their migration, along with the White-naped Honeyeater and a few other species, is becoming a well-known spectacle. In fact the Greater Blue Mountains was declared an Important Bird and Biodiversity Area, partly on the basis of being a migratory bottleneck for the Yellow-faced Honeyeater. For more information see: <http://www.bmbirding.com.au/hemig.html>

It should also be noted that the Hawkesbury-Nepean floodplain is a very important corridor for waterbirds and raptors and contains many wetlands significant as drought refuges for a wide range of nomadic waterbirds.

The potential effect of aircraft noise on birds has several consequences, and may include an impact on -

- a. flora - as some birds are pollinators; while others disperse seeds.
- b. their breeding - as they seek out new breeding grounds and become separated
- c. their feeding - as they need to find new food sources, or their nocturnal hunting is disrupted
- d. other birds - as they are either displaced, or become overcrowded.

Some studies exist on the effects of noise on birds, and I would expect that these would be seriously considered in the establishing of runways and flightpaths.

Studies include –

- a. *Noise pollution alters ecological services: enhanced pollination and disrupted seed dispersal.*
Francis, Kleist, Ortega and Cruz. March 2012. Proceedings of The Royal Society, Biological Sciences.
- b. *Negative impact of traffic noise on avian reproductive success.*
Wouter Halfwerk, Leonard J. M. Holleman, C(Kate). M. Lessells and Hans Slabbekoorn
Behavioural Biology, Institute of Biology, Leiden University, The Netherlands.
Published by the British Ecological Society in the Journal of Applied Ecology 2011

If you have any queries in regard to this submission please contact, Alan Page, President on ph 02 4784 1704 or email president@bluemountains.org.au.

Yours sincerely



Alan Page
President
Blue Mountains Conservation Society

Appendix A.

Full (or mostly) migrants – 38 species

Australian Reed-Warbler	Black-eared Cuckoo	Black-faced Monarch
Brown Songlark	Brush Cuckoo	Channel-billed Cuckoo
Cicadabird	Common Greenshank	Dollarbird
Dusky Woodswallow	Eastern Koel	Fairy Martin
Fan-tailed Cuckoo	Flame Robin (altitudinal migrant)	Fork-tailed Swift
Horsfield's Bronze-Cuckoo	Latham's Snipe	Leaden Flycatcher
Masked Woodswallow	Olive-backed Oriole	Painted Honeyeater
Pallid Cuckoo	Rainbow Bee-eater	Rufous Fantail
Rufous Songlark	Rufous Whistler	Sacred Kingfisher
Satin Flycatcher	Sharp-tailed Sandpiper	Shining Bronze-Cuckoo
Swift Parrot	Tree Martin	Western Gerygone
White-browed Woodswallow	White-throated Gerygone	White-throated Needletail
White-throated Nightjar	White-winged Triller	

Partial migrants, evidence of some seasonal latitudinal or altitudinal migration - 26

Black-faced Cuckoo-shrike	Crescent Honeyeater	Eastern Spinebill
Fuscous Honeyeater	Grey Currawong	Grey Fantail
Mistletoebird	Noisy Friarbird	Painted Button-quail
Pied Currawong	Red Wattlebird	Regent Honeyeater
Restless Flycatcher	Rose Robin	Scarlet Honeyeater
Silvereye	Spangled Drongo	Spotted Pardalote
Square-tailed Kite	Striated Pardalote	Welcome Swallow
White-backed Swallow	White-naped Honeyeater	Willie Wagtail
Yellow-faced Honeyeater	Yellow-tailed Black-Cockatoo	

Nomadic (irregular or less understood movements) – 47 species

Australasian Bittern	Australasian Darter	Australasian Shoveler
Australian Crake	Australian Painted Snipe	Australian Pelican
Australian Pied Cormorant	Australian White Ibis	Baillon's Crake
Banded Lapwing	Black Kite	Black Swan
Black-fronted Dotterel	Black-tailed Native-hen	Black-winged Stilt
Blue-billed Duck	Buff-banded Rail	Eastern Great Egret
Freckled Duck	Gang-gang Cockatoo	Glossy Ibis
Great Cormorant	Grey Teal	Hardhead
Hoary-headed Grebe	Intermediate Egret	Lewin's Rail
Little Black Cormorant	Little Button-quail	Little Lorikeet
Little Pied Cormorant	Musk Lorikeet	Nankeen Night Heron
Pink-eared Duck	Plumed Whistling Duck	Red-chested Button-quail
Red-kneed Dotterel	Royal Spoonbill	Spotless Crake
Spotted Harrier	Straw-necked Ibis	Swamp Harrier
Wandering Whistling Duck	Whiskered Tern	White-faced Heron
White-necked Heron	Yellow-billed Spoonbill	