



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

21 July 2025

Ms Susan Templeman MP

Email: susan.templeman.mp@aph.gov.au

Dear Ms Templeman,

I am writing regarding the Environmental Management Plan (EMP) Western Sydney International (Nancy-Bird Walton) Airport – Part A Conditions Specific to the Action.

Thank you for continuing to advocate for conditions aiming to mitigate the potential damage to the Greater Blue Mountains World Heritage Area and other nearby protected natural areas by the draft WSI flight paths.

Before writing this letter, I liaised with the Joel Dalberger, the CEO of the Blue Mountains World Heritage Institute and Dr Aaron Greenville, School of Life and Environmental Sciences, the University of Sydney to gain an understanding of common concerns in the scientific design of the EMP. I have briefly detailed these here.

Key Concerns

1. **Scientific methodology and implementation of the EMP.** There are few details contained in the conditions of authorisation (<https://www.wsiflightpaths.gov.au/conditions/>) and so the EMP lacks transparency in design and means of execution. This failure will undermine the value of any results and conclusions.

Recommendation: Engage independent, peer-reviewed experts with skills and experience in soundscape ecology, ecoacoustics and biodiversity monitoring and publish the details of their methods for comment.

2. **Absence of baseline data** on both (a) levels of noise from aircraft and (b) species of birds/other animals present in the study areas, which needs to be collected **before** the airport is operational. The EMP states that monitoring is to start in 2026, but it needs to start in 2025 to enable baseline data to be gathered. Without this data, it will not be possible to accurately assess change in natural areas over time.

Recommendation: Monitoring must commence in the second half of 2025 to ensure sufficient baseline data is collected i.e. data reflecting the biodiversity of the area prior to the flights commencing.

3. **Inadequate time frames presented for long-term monitoring.** The current periods included in the EMP are (a) 2026-2031 and (b) 2045-2055. This leaves a 14-year gap between the first monitoring period and the second monitoring period, when no data will be collected and analysed. Fourteen years is a long time; during this period, flights into and out of WSI are predicted to rapidly increase, exposing birds and other animals to a large increase in noise levels and potentially significant detrimental impacts, resulting in a loss of species from the area. The current monitoring strategy will not pick up this potentially devastating impact on biodiversity until it is too late. This design will fail to provide a timely opportunity to put in place mitigating actions to prevent such a loss.
Recommendation: Monitoring must extend continuously through 2026-2060, with regular reviews and publicly available data.
4. **There is no mention of the implementation of any actions being required to mitigate the detrimental impacts discovered during the monitoring study.**
The purpose of monitoring is to ensure that the animals and their populations in the GBMWhA and other the natural areas are not adversely affected by aircraft noise, which will also adversely affect the area's Outstanding Universal Value.
Recommendation: Appropriate actions must be required of WSA Co, Air Services Australia and the Department of Infrastructure to mitigate adverse impacts and these actions must be made public. Such actions may include changes in flight paths to avoid the GBMWhA or other noise abatement modifications.
5. **It is unclear how Traditional Owners and First Nations knowledge holders will be sufficiently represented.** Similarly, it is unclear whether local environmental community groups such as the Blue Mountains Conservation Society will be invited to be a stakeholder under the current definition contained in the EMP. The absence of a voice from such strongly supported community groups with a long and detailed knowledge of the GBMWhA and its ecology, and importance to local people, would be a loss.

The Blue Mountains Conservation Society (the Society) will be writing a more detailed submission to the WSI Master Plan (<https://www.wsimasterplan.com.au>) and we will submit this prior to the 2 September deadline. I will provide a copy to your office.

Thank you for taking the time to read this letter. I would appreciate a response to the recommendations contained in this letter.

Yours sincerely,



Annette Cam
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