



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

6 August 2025

Dr Rosemary Dillon
General Manager
Blue Mountains City Council
Locked Bag 1005
KATOMBA NSW 2780
Email: council@bmcc.nsw.gov.au

Dear Dr Dillon,

Draft Compliance and Enforcement Policy

The Blue Mountains Conservation Society is a community volunteer organisation with over 900 members, which has been in existence for over 60 years. The Society's aims are to help conserve the natural environment of the Blue Mountains and to increase awareness of the natural environment in general.

The Society thanks you for the opportunity to make a submission in relation to the draft *Compliance and Enforcement Policy* presently on exhibition (the **draft Policy**).

The Blue Mountains Conservation Society welcomes the draft Policy and congratulates the Council for addressing many of the issues that previously concerned the Society.

The Greater Blue Mountains World Heritage Area is one of only 231 natural World Heritage sites on Earth.

The City of Blue Mountains is wholly surrounded by the Greater Blue Mountains World Heritage Area, and virtually every significant detrimental impact on the environment that occurs within the City of Blue Mountains has the potential to have a serious impact on the World Heritage Area, particularly water pollution, environmental weed distribution and large-scale tree/vegetation clearing.

The following recommended amendments (in **blue text**) to the draft Policy are intended to emphasize the unique role of the Council in relation to World Heritage.

Recommended amendments to ‘Scope’

Insert a new sub-clause (h) and adjust existing sub clause (e) as follows:

- (h) *protection of all watercourses from pollution and other types of environmental degradation, particularly those flowing into the World Heritage Area or other ecological significant areas.*
- (e) *dumping of weeds, encroachment on natural areas and other environmental health and pollution issues.*

Recommended amendments to Proactive Compliance (clause 2)

Insert a new sub-clause (n):

- (n) *inspections of encroachment on public natural areas*

Recommended amendments to Reactive Compliance (clause 3) to give greater emphasis to matters impacting on World Heritage Area and values

Insert the text in blue in the (otherwise excellent) Prioritisation Category matrix.

PRIORITISATION CATEGORY			
CRITICAL	HIGH	MEDIUM	LOW
...	...	...	...
Example of issues			
... <i>Large-scale tree or vegetation clearing in progress</i>	... <i>Rubbish or pollution incidents which may affect the World Heritage Area and other reserves</i>	... <i>Encroachment on natural areas</i>	...

Recommended amendments to Compliance and Enforcement Decisions (clause 4)

Insert a new sub-clause (d) to give greater priority to allegedly unlawful activities which are ‘live’, and adjust the following sub-clauses according:

- (d) *whether the alleged unlawful activity is:*
 - *posing a risk to public health and safety;*
 - *having or has had a detrimental impact on the*

environment;

- *posing a risk to public amenity;*
- *is presently underway or is ongoing;*

Thank you for the opportunity to make submissions in relation to the draft Policy.
Please do not hesitate to contact me on president@bluemountains.org.au

Yours sincerely

A handwritten signature in dark ink, appearing to read 'A. Cam', written in a cursive style.

Annette Cam
President
Blue Mountains Conservation Society