



---

20th November 2024

c/- Post Office, Snug, TAS 7054

## **Threat to the natural, scientific and cultural heritage values on Mirning Country / Nullarbor karst**

Attn: Shiloh Peel  
Chairperson MTLAC  
and the MTLAC Board of Directors  
Mirning Traditional Lands Aboriginal Corporation  
1171 Hay Street, West Perth WA 6005

By email only: [admin@mirning.com.au](mailto:admin@mirning.com.au)

Dear Ms Shiloh Peel and MTLAC Board of Directors,

1. With reference to our earlier correspondence sent 25<sup>th</sup> April 2024, when we approached you offering a Zoom meeting to hear more about your concerns for protecting the caves and rock holes on the Nullarbor which you expressed in your interview aired on the ABC News 7.30 Report 23<sup>rd</sup> April. In our email we also offered to share our ideas about protecting the caves, rock holes and other important karst features on Mirning Country / Nullarbor karst.
2. We received a reply from Madison Snow on 29<sup>th</sup> April which stated that a conversation about Mirning Country will likely need to be had with additional MTLAC representatives, and that a response would be forthcoming.
3. We have heard nothing further from you, so we are writing again to remind you of our respectful offer to meet and discuss the protection of caves, rock holes and other important karst features on Mirning Country / Nullarbor karst.

4. Save The Nullarbor Inc. acknowledges and pays respect to the Ancestors who came before, and the Elders emerging and present, of all the Mirning People.
5. Our committee members and advisors represent a wide range of scientific disciplines, environmental law, creative expertise, and cultural experience, united by a deep compassion and respect for the Nullarbor karst region, its Aboriginal Peoples, and its natural, scientific, and cultural heritage.
6. We feel urged to reach out to you again, and especially now, considering a Section 38 Referral for the Western Green Energy Hub (WGEH) by EPA 11<sup>th</sup> November inviting public comment on the level of EIA assessment, which closed 17<sup>th</sup> November.
7. Our committee members and advisors have reviewed WGEH's Supporting Document-26.
8. We have recommended to the EPA that the WGEH proposal be subject to a public environmental review.
9. Despite the restrictive 7-day time frame and 500-word limit imposed by the EPA, we have identified a significant number of deficiencies in WGEH's Supporting Document-26.
10. Some of the deficiencies in WGEH's supporting document include, for example:
  - a. Failure to recognise karst landforms (especially caves and rock holes) as a key environmental factor.
  - b. Failure to recognise that karst, and karst landforms, with their associated qualities and values are the prime reason the Nullarbor was identified 32 years ago as a strong candidate for UNESCO World Heritage nomination. This recommendation was based on the benchmark report commissioned by the Commonwealth of Australia (Davey et al 1992), to assess the World Heritage significance of karst and other landforms in the Nullarbor region. While the commissioned scope of the Davey et al. report was limited to the significance of karst and other landforms, the report emphasises the very rich

cultural heritage in the caves and rock holes and suggests (p. 120) that the Nullarbor represents “exceptional combinations of natural and cultural features” with respect to World Heritage criterion 36(a)iii.

11. Irrespective of even the most strident commitments to Impact Avoidance, Mitigation and Rehabilitation, and even if such measures are made legally enforceable under EPA Conditions of Approval, the proposed WGEH energy development would wreak unavoidable harm - environmental, cultural and social – not only within the proposed development footprint, but very importantly, across the entire Nullarbor region and Great Australian Bight.
12. We believe that Mirning Country / Nullarbor karst deserves to be respected, cherished and protected forever.
13. We support the long-term protection of Mirning Country / Nullarbor karst through National Heritage and World Heritage listing.
14. Any National Heritage or World Heritage nomination necessarily involves full and informed prior consent of Traditional Owners / Custodians and interested parties before it can proceed. In 2018 UNESCO endorsed its *Policy on Engaging with Indigenous Peoples 201EX/6*. This important document includes the role of Aboriginal Peoples in the conservation of natural and cultural heritage and applies to all activities supported by UNESCO – not just World Heritage.
15. We thus believe that World Heritage can co-exist with Traditional land use practises, responsible pastoralism, and nature conservation, enabled via cooperative management between Traditional Owners / Custodians, pastoralists, land conservation agencies, independent scientists, speleologists and other stakeholders.
16. We believe that a sustainable future for Mirning Country / Nullarbor karst depends on fostering environmental, social and economic opportunities and outcomes that benefit both the environment and people, such as minimal impact eco-tourism enterprises owned and run by Aboriginal Peoples.



---

Yours sincerely,

Save the Nullarbor Inc. Executive Committee:

Dr Stefan Eberhard (President)

Bronwen Eberhard (Secretary)

Cindy Mathers (Treasurer)

Andy Spate AM (Executive Committee)

Professor David Gillieson (Executive Committee)

<https://linktr.ee/savethenullarbor>

[www.savethenullarbor.org](http://www.savethenullarbor.org)

**Email:** [admin@savethenullarbor.org](mailto:admin@savethenullarbor.org)