



Goulburn River Stone Cottages

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Coal & Gas Strategy
Dept Planning - Premiers Department
GPO Box 39
SYDNEY NSW 2001

Re: NSW Coal & Gas Strategy Scoping Paper.

Terms of Reference - Ministerial Subcommittee:

- A fundamental objective of the Strategic Plan must be the requirement for ECOLOGICAL sustainable development where current and future environmental, social and economic values are fully accounted for in the planning and assessment process.
- The stated aim of the Strategy is for the continued development of the mining industry "*based on the community's commitment to co-existence*" this has not been established and should not be assumed.
- The terms should not assume that all environmental impacts can be successfully managed or mitigated. Past experience and widespread community outrage suggest this is not the case (e.g. climate change, permanent degradation of groundwater systems, cliff collapse due to subsidence).

Point 1 a) Strategy context should include underground mining and gas extraction.

Point 2 f & d) Identify key impacts – reference to water resources must include the fracturing and interference to aquifers due to mining and loss of connectivity with river systems (that may occur many kilometres outside the mining footprint).

Point 3 Assessment of existing regulations and legislation needs to include:

- Methods used to determine offsets for loss of biodiversity, mechanisms for their legal protection and long term management and whether claimed biodiversity outcomes are equitable to the losses.
- Failure of regulators to ensure progressive, integrated and effective mine rehabilitation that restores functional ecosystems and productive landscapes and land uses
- Noise and dust emissions are typically understated by mining projects. Low frequency sound is not required to be reported under the NSW Industrial Noise policy this needs to be addressed as does the reporting of fine dust emissions (PM2.5) to ensure regulations protect the health and well-being of surrounding landholders and their capacity to co-exist.

- Inconsistencies in the application of state and federal water regulations and policies to mining projects as opposed to other water users (e.g. interference and fracturing of aquifer systems)
- Lack of transparency and community consultation in granting Exploration Licences

Point 4 Identify options and initiatives that will:

- Provide long term protection of sensitive and significant landscapes that are valued by the community (ie exclude them from mining development). For example river systems and connected groundwater resources, natural areas of high conservation or cultural value, productive agricultural land.
- Publicly record the location of mining offsets (database system) and monitor biodiversity gains (or losses). Including offsets from past development approvals.
- Support regular and transparent environmental audits of mines to ensure the effectiveness of the regulations and assess compliance (e.g. independent panel comprised of expert and community representatives).

Point 5 Cost-benefit analyses of mining projects must factor in the long term costs and externalities. These include the destruction of irreplaceable natural systems (ie water resources and biodiversity) and associated ecological services; loss of productive well-watered agricultural land; the displacement of communities and the decline in the diversity of local business enterprises.

Point 7 – There needs to be a formal review process within a set timeframe

Scoping Paper

The paper refers to **‘emerging’** community concerns about coal mining impacts and threats - these issues are not emerging but **systemic** to the coal industry.

Coal & Gas Industry Prospects

The scoping paper provides an unbalanced perspective of the costs and benefits of coal and gas mining in NSW. It has failed to include cost-benefit analyses that include cost externalities particularly those related to the interference to and permanent degradation of groundwater and surface water systems, loss of endangered native species, further clearing in already over-cleared landscapes as well as cost to health and community infrastructure.

Coal and Gas mining are extractive industries with a finite resource totally dependent on (and vulnerable to) overseas markets. The continuing growth of coal and gas mining requires considerable sacrifice by communities in coal mining areas. **Long term impacts go well beyond the 25 years stated in the scoping paper and well beyond the mine footprint.** The current expansion in the coal industry has created an overheated, two-speed economy which is placing unacceptable pressure on community services and infrastructure and displacing sustainable local industries that employ a wider demographic of workers over a longer period.

The Scoping paper bases its strategy on industry figures that optimistically forecast significant growth in coal and gas use by 2030. These figures are debatable and based on a business as usual approach. Countries all around the world are already moving to renewable power, China leads the world in the production and installation of clean energy

technologies. Wind power in Spain¹ has just reached 21% of electricity demand. The Hon Greg Combet AM MP in a recent speech in Cairns made the following comments:

“The countries that develop the technologies and products that allow the world to decouple production from pollution will be the countries that will prosper most in the 21st Century”².

The Strategy should not be based on industry figures assumptions that fossil fuel use will significantly increase while ignoring the over whelming evidence of catastrophic climate change.

Future Growth Areas and Issues

Key issues - Western coal resource area:

Managing cumulative impacts from the Moolarben-Ulan-Wilpinjong mining complex and the proposed Bylong projects should be scrutinized as an integral part of the Hunter Catchment as these mines lie geographically within the Hunter Valley.

Key issues should include:

- Need for an Independent Hydrological Study of the Upper Goulburn catchment (this has been called for since 2004 at the beginning of the new expansion phase)
- Interference and fracturing of aquifers and permanent damage to the “*significant regional groundwater system*” that provides base flow to the Goulburn and Hunter rivers. Depressurisation of this groundwater system is predicted to take in excess of 200 years to ‘rebound’ resulting in a significantly degraded resource (a lowered water table with loss of connectivity with river system and reduced water quality)³
- Providing maximum protection for high conservation and culturally significant landscapes. The inclusion of the iconic landscape known as The Drip Corner Gorges and Goulburn River into the adjoining Goulburn River National Park has widespread community support and should e a bare minimum as an offset.
- Distance of DECCW office to mine complex (>2 hours drive), reliance on self-regulation - Mine Management Plans not proactively implemented (e.g. Moolarben Erosion and sediment Control Plan) dependence on community members to alert EPA of breaches (and collect evidence).
- Numerous major mine modifications are made after original approval has been granted that have substantially increased mine footprint and impacts.
- Biodiversity offsets should be located within the affected catchment/bioregion.

The Key Initiatives of the Strategy

Potential Growth of the industry & Land use conflicts

Options should look beyond 25 years and investigate limiting coal extraction to moderate

¹

http://www.google.com/hostednews/afp/article/ALeqM5jpLZh_9Ue7GAQDgb4lc220dyHnZw?docId=CNG.23a428af6162593a585797da96657677.c1

² Greg Combet speech Greenhouse 2011, Cairns April 4, 2011

³ Ulan Coal Continued Operations, Groundwater Assessment July 2009 Mackey Environmental Research

environmental impacts, avoid a boom and bust economy and encourage alternate sustainable industries to function and develop.

The strategy needs to address post mining land use options and potential opportunities for later industries (e.g solar farms).

5. Land rehabilitation

Mines that fail to meet set rehabilitation benchmarks acceptable to the community should have their clearing approvals revoked and further development approvals restricted.

Mine offset strategies need to address landscape resilience and have ongoing monitoring and maintenance.

6. Community facilities and services in the regions

Assessment of services and facilities should not just look at benefits and comparative benchmarks but include the costs of externalities as mentioned above, displacement of small communities and other decentralised industries. There needs to be a strategy that will assist the set up of education, training and manufacturing facilities to support an orderly transition away from coal-dependency towards renewable energy sources.

8. Strategic biodiversity planning

Offsets and impacts should address cumulative losses on biodiversity that is valued by the community not just those deemed “high biodiversity value”. It is not possible to offset endangered ecological communities.

9. Water resource management

Policy should (not could) be prepared to address the long term impacts on groundwater/surface water interaction including fracturing and interference of aquifers and loss of base flow to river systems. There is also need for regional baseline studies on water resources in potential and current coal mining areas.

11. Regulation and standards

There should be independent monitoring of consent condition compliance, streamlining of penalties appropriate to the breaches and less reliance on self monitoring.

Mining should not be exempt from major environmental legislation. For example the Native Vegetation Act and Water regulations which has created significant inequities between mining and other industries.

12. Improving communication

Improve public access to latest monitoring information and assessment reports plus the provision of independent experts to interpret technical information. There needs to be a commitment by government to listen and actively respond to community concerns.

Yours faithfully,

Two handwritten signatures in black ink. The first signature, on the left, is 'John Imrie' written in a cursive style. The second signature, on the right, is 'CD Imrie' also in a cursive style.