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Coal and Gas Strategy
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**Feedback on the Coal and Gas Strategy Scoping Paper
from Rylstone District Environment Society**

In addition to the issues outlined in the Scoping Paper, Rylstone District Environment Society believes that the Strategy should address the following:

Better information for the community

- The strategy should address how to provide greater transparency about the exploration process – and the whole process of approving mining applications. Local communities need accessible, easy-to-understand and site-specific information about potential impacts of coal and CSG exploration. We need better access to good information about what is proposed, where, when and by whom. This information needs to include maps identifying land, properties, townships, natural assets and infrastructure that could be affected. The strategy should be informed by an information audit which asks ‘What do communities need to know?’ and ‘How can government (or development proponents) best provide this?’.

Climate change

- The strategy should address the contribution of coal and CSG to greenhouse gas emissions, and require that mining and energy companies include in their exploration licence applications information about long-term costs to the community associated with climate change.
- The strategy should require that budget forecasts of government revenue from mining and CSG taxes and royalties should also include forecasts of long-term costs to the community associated with climate change.

Broader context – and a means of comparing energy sources

- The strategy should be part of a broader Energy Strategy which mandates a protocol for full, whole-of-life costing for all energy sources, including metrics that allow comparisons of long-term social, environmental and economic impacts. This costing method needs to take into account all pollution caused by an energy source, including greenhouse gas emissions. At present this is in effect a free subsidy to the coal and CSG industries. ('Putting a price on carbon will remove an unfair subsidy that industry has enjoyed for too long' Deutsche Bank's Mark Lewis reported in the *The Sydney Morning Herald*, 2 April 2011; <http://www.smh.com.au/business/carbon-price-fair-20110401-1crq7.html>.)

Cost-benefit analysis

- Cost-benefit analysis of competing land uses should be carried out in all the areas where coal and CSG activities are proposed – not just in the areas mentioned in the Scoping Paper (Gunnedah Basin and Singleton-Scone).

Environmental impacts

- The strategy should include a requirement for an in-depth regional water study to be undertaken by an independent party, approved by the relevant local catchment management authority, before an exploration licence is granted. The study needs to look at rivers and groundwater resources and long-term water security for affected communities.

Health impacts

- The strategy should require that coal and CSG proposals include projections of long-term health costs to the community. Research from the US suggests that the long-term health costs to the community can be five times greater than the short-term benefits.
- The strategy should be informed by detailed scientific research into the local and regional health impacts of coal and CSG. This should include a review of published research – worldwide.
- The strategy should include reference to the known health impacts relating to dust from coal mining. For example, the rate of autism in Singleton is 1 in 15; in Japan this rate is 1 in 15,000. Other health affects that should be discussed are high rates of respiratory conditions including asthma, and depression.
(Dr Dick van Steenis interviewed on Radio National, 8 March 2011: <http://www.abc.net.au/rn/latenightlive/stories/2011/3158266.htm>.)
- The strategy should include an assessment of the risks associated with possible future compensation cases relating to health impacts – who will bear these risks?

Planning requirements

- The strategy should require that any expansion of the coal & CSG industry is informed by a comprehensive Land Use and Planning Strategy. This preliminary work should involve extensive community consultation and input.
- The Land Use and Planning Strategy should address the cumulative impacts of the coal and CSG industries on federal, state and local infrastructure, and how proposed upgrades in infrastructure will be planned, implemented and paid for. New project approvals should require a detailed Infrastructure Plan.

Approval process

- The strategy should be informed by a thorough review of the existing approval process for mining activities. The review should look at the changes that take place after approvals have been granted: changes to conditions of approval, pollution licences, operating plans and mining activities. The review should also address how to ensure that consultants' reports are not biased in favour of mining proponents.
- The strategy should require that communities are given more time and better resources to review the environmental impact statements that accompany mining applications.

Compliance

- The strategy should address the numbers of regional EPA staff required to make sure that companies comply with their approval conditions.

Post-impact reviews

- The strategy should require that actual environmental impacts from coal and CSG activities are reviewed against predictions made in the environmental impact assessments that accompany licence applications – with appropriate actions taken to address any discrepancies.

Errors

- The Scoping Paper states that land within the Western coal resource area is not considered to be prime agricultural land. This is not correct. The Bylong Valley contains prime agricultural land. Land around the Mudgee area is prime agricultural land. The strategy needs to address the conflicts between coal and CSG activities and rural industries such as wine grape and olive growing. Agriculture is of prime importance to all the communities in the Mid-Western Region.
- Key issues for the Western coal resource area need to include impacts on the tourism industry. Mudgee region tourism is a vital part of our economy. Tourism is already being impacted by the expanding mining industry, e.g. by competition for short-term accommodation.