

Hunter Environment Lobby Inc.

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SUBMISSION

Draft Integrated Mining Policy - Stage 1

Hunter Environment Lobby Inc. is a regional community-based environmental organization that has been active for over 20 years on the issues of environmental degradation, species and habitat loss, and climate change.

We have witnessed over that time a rapid expansion of large coal mining operations in the Hunter Region that have been assessed and approved with no consideration of the cumulative impacts on the environment or the community.

For an Integrated Mining Policy (IMP) to be effective it must give high priority consideration to clear and consistent assessment of cumulative impacts across the industry.

We recommend that a comprehensive set of cumulative impact assessment guidelines be provided to the mining industry to ensure that there is adequate consideration of this important planning measure.

The guidelines should include methodology for assessing cumulative impact on biodiversity, water sources and associated licence availability, air quality and noise pollution, blasting, communities, other industries, Aboriginal and European heritage and transport infrastructure.

The expansion of existing projects, and the application for a new project that will be the first stage of a larger project over time, should clearly assess the cumulative environmental, social and perverse economic impacts.

An effective IMP should also provide clear guidelines for the assessment of social impact and for conducting adequate community consultation. This would assist in improving community trust in the industry and in the planning process.

We are of the opinion that the Hunter Region has possibly reached a tipping point that has impacted on the environmental and social resilience to fully recover from the cumulative impact of current mining operations.

The cumulative impact of final voids as a permanent legacy in the landscape is of particular concern. It is critical for the NSW Government to develop a policy that prevents the approval of new final voids in post mining landforms in the Hunter.

The attempt at developing an Upper Hunter Strategic Regional Land Use Plan has failed to protect key environments, the long term integrity of the Hunter River, communities and other industries in the region.

The planning system for state significant mining development needs a much larger overhaul than proposed in the IMP.

The proposed offsets policy for upland swamps and associated threatened species is entirely inappropriate and will cause long term irreversible damage to sensitive ecosystems. These important groundwater dependent ecosystems must be identified as 'no go zones' for longwall mining and trigger a 'red flag' within the approvals process.

Yours sincerely

Jan Davis

Jan Davis President