

EG:VC/Emily Goodworth  
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13 July 2015

Mr Alex O'Mara  
Executive Director, Resources and Industry Policy  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr O'Mara

### **EXHIBITION OF THE INTEGRATED MINING POLICY**

Thank you for the opportunity to provide comment on Stage 1 of the Integrated Mining Policy. Council supports the creation of documentation that intends to improve the coordination and cooperation between government agencies, reduce duplication between the various mining approvals required and provides greater clarification on Government requirements for the mining assessment process.

Please find below, some specific comments in relation to the review of the exhibited material:

1. Council concurs that all ancillary activities and infrastructure should be included as part of the State Significant Development Application even if it is intended that they will be subject to a separate approval process. These ancillary components and their approval process should be clearly identified so as to avoid confusion by government agencies in their assessment of the application or members of the community during the exhibition of the application.
2. With regard to the details of monitoring programs to be included as part of the Environmental Impact Statement (EIS), it is recommended that nominated periods should be specified for the different types of monitoring programs.

### **Swamp Offset Policy**

3. Whilst a minimum of two years pre-mining piezometric measurement of the effect of mine subsidence on the shallow groundwater aquifer has been set, there is an ability to undertake a more conservative assessment in the absence of this data. It is recommended that the proponent should still carry out some piezometric measurement for a nominated period.

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**Exhibition of the Integrated Mining Policy**

4. The framework only refers to longwall mining. Open cut mining also has the potential to affect shallow and deep groundwater systems as well as having the potential to impact on sensitive ecosystems (including threatened fauna/avian habitat) by dust, light and noise emissions.
5. The information relating to reduced offsets and re-crediting of retired/deposited offsets appears inconsistent with the principle of offsetting. It is considered that subsidence or other impacts do not happen within a given timeframe during mining or after mining activities cease. As such, any impact may occur after the period nominated by the policy and the opportunity to retain or implement any new offset requirements has been lost.

Council welcomes the continued opportunity to provide:

- Comment on the Preliminary Environmental Assessment
- Input into the SEAR's
- Advice/comment on the EIS, including the provision of relevant conditions of consent where appropriate.

If you have any further enquiries regarding this matter, please contact me on (02) 4350 5436.

Yours faithfully



Emily Goodworth

**Acting Manager**

**DEVELOPMENT AND REZONING**