17 November 2015

Ms L. Develin
Deputy Secretary
Growth, Design and Programs Division
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Develin,

Re: Submission on the draft Guidelines for the economic assessment of mining and coal seam gas proposals

Wingecarribee Shire Council has a long standing interest in the impact of mining activities on our local economy, water, farmlands, tourism and the natural environment. As a result, Council has adopted a number of resolutions on this matter since 2010.

We have provided some comments below on the draft Guidelines that we hope the Department can consider. Our comments reflect our interest in well-informed community decision making and protecting local economic options in the long term.

- Council welcomes the emphasis in the draft Guidelines on a consistent and robust approach to economic analysis and the inclusion of local effects analysis to inform decision making and provide community information.
- A greater emphasis in the Guidelines on the transparency of assumptions and calculations in the economic analysis would enable full understanding and replication of analysis. This would enable the community to be fully informed of the analysis that has been undertaken for the proposal and enable analysis of alternatives for comparison.
- There is currently no guidance on when each of the cost benefit approaches is to be used. The fuller extent of information in approach one would be of public interest.
- The local effects analysis section currently emphasises the employment benefits compared to the effects on local industries. Expanding the information on analysis of the effect on local industries would promote the full consideration of the impact on alternative industry employment.
• Biodiversity offsets are prominent in the Guidelines and we note broader academic and community concern that reliance on offsets may not produce an adequate result or provide any local environmental benefit to offset the local impact.

• There is little focus in the economic analysis on identifying alternative proposals and cumulative impacts, both of which would have a significant impact on the feasibility of the proposal.

Particularly important to Wingecarribee Shire Council is the accurate and robust reporting of local effects. Supporting the Community Strategic Plan 2031, Wingecarribee Shire Council is establishing an economic development framework which identifies emerging and sustainable industries and adapts to losses of traditional industries and workforces due to changing technology and automation, including mining workforces.

Development of the economic framework includes working with the community and businesses to identify projects that could generate an estimated 6500 sustainable jobs to 2031. As mining proposals would adversely impact these emerging activities, along with our existing tourism and agricultural opportunities, the Guidelines and economic analysis should include a mechanism to acknowledge these initiatives and enable this kind of community information to be fully captured in the economic assessment.

Thank you for the opportunity to provide input into the draft Guidelines. If you would like any further information, my contact details are below.

Yours sincerely

[Signature]

Mr Barry Arthur
Manager Environment and Sustainability