Deputy Secretary
Growth, Design and Programs Division
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

20 November 2015

Dear Sir/Madam

DRAFT GUIDELINES FOR THE ECONOMIC ASSESSMENT OF MINING AND COAL SEAM GAS PROPOSALS (DRAFT ECONOMIC GUIDELINES)

The Draft Economic Guidelines has strong relevance to existing and proposed mining and coal seam gas (csg) operations within the Wollondilly Local Government Area (LGA) (See Map 1). The opportunity provided to Council by the NSW Department of Planning and Environment to lodge a submission on the draft Economic Guidelines is therefore appreciated.

Council is supportive of economic development and the carrying out of mining activities provided such development does not adversely impact on the natural, cultural or built environment as well as addresses the concerns of the local community. Council is also of the view that the social, economic and environmental impacts associated with both mining and csg operations need to be reimbursed to the community.

The draft Economic Guidelines is therefore supported in principle as a means of enabling a consent authority to determine the overall benefits and impacts of both mining and coal seam gas (csg) projects on a localised scale. However, a review of the Guidelines by Officers identified a number of inconsistencies with Council’s adopted position as well as the expressed concerns of the local community it represents. A draft submission has consequently been prepared (attached) which contains a wide variety of requested amendments consistent with this adopted position. The submission also contains summary Council position statements on key aspects of the Guidelines that include:

- The approach adopted by the draft Guidelines has considered deficiencies in providing an accurate identification of social and economic impacts associated with mining and csg projects on a localised scale.
- The highly technical nature of the Economic Assessment prepared in accordance with the exhibited Guideline will not be readily understood and interpreted by the broader community.
Should you have any enquiries regarding aspects of the attached submission, please contact Council's Environment Assessment Planner, David Henry, on (02) 4677 9687 or via e-mail david.henry@wollondilly.nsw.gov.au.

Yours faithfully

Brad Staggs
Environmental Services Manager
ENVIRONMENTAL SERVICES
Submission the Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals

This submission provides comments on the Economic Assessment of Mining and Coal Seam Gas Proposals (Economic Guidelines) that are consistent with previous Council resolutions and lodged submissions within a localised structure. The submission is divided into the following components:

- Background information Council's position on mining and coal seam gas operations and the economic, social and social benefits and impacts of these operations.
- General comments on the Guidelines and the Cost Benefit Analysis approach adopted.
- Comments on individual; components of the Guidelines that are consistent with previous Council submissions of relevance to mining and coal seam gas projects within the Wollondilly Local Government Area.

1) Background information

(i) Council position on mining and coal seam gas activities in the Wollondilly LGA

A significant proportion of the Wollondilly Local Government Area (LGA) is the subject of current coal seam gas (csg) and underground coal mining operations. A map showing the location of these operations and status as well as locations of individual gas wells is presented in Map 1 (Attachment 1).

Council has not adopted a formal position on underground coal mining or the three mining projects currently operating within the Wollondilly LGA. However, the general adopted position is that mining activity is not opposed provided it can occur without adverse impacts to the natural, cultural and built environment. Council has also taken a proactive approach in advocating the expressed concerns of the local community in regard to regarding these impacts.

In relation to coal seam gas operations, Council initially adopted a position that is defined by 6 resolutions at its meeting in June 2011. These resolutions occurred in response to the increasing deficiencies in scientific knowledge in risks associated with these operations and community concern that were occurring at this period. Council resolved at its meeting on 21 November 2014 to reaffirm its position following a review of the findings and recommendations of the Final Report by the NSW Office of Chief Scientist and Engineer on the Review into Coal Seam Gas Activities in NSW. This position includes a resolution that the NSW Government: “Impose an immediate moratorium on all further csg development until it can be demonstrated that the industry will not have any unacceptable social and environmental impacts”.

Resolutions of Council that define its position on coal mining and csg operations as well as the legislative and regulative framework for these activities are presented in Attachment 2.
Comments and recommended amendments to the Economic Guidelines provided in subsequent sections of this submission are consistent with the above positions of Council.

(ii) **Council position on economic issues associated with mining and csg by the Economic Guideline**

Council’s overall position on economic development is best defined by its Mission Statement: "To create opportunities in partnership with the community and to enhance the quality of life and the environment, by managing growth and providing sustainable services and facilities". This position is further illustrated by the following objectives of its Community Strategic Plan:

- **Strengthen and diversify Wollondilly’s economic base by attracting and supporting the development of a diverse range of industries.**

- **Protect natural resources so as to contribute to the Shire’s economic well-being.**

Council recognises the contribution that the mining and coal seam gas industry provides to the local and state economy as well as the employment both directly and indirectly that the industry provides. The latest information available to Council in the *Economy - ID - Profits* 2014 indicates that mining was biggest economic contributor worth $299m or 22.1% of the total economic value of the Wollondilly LGA, which is a significant decrease from the preceding year. This economic value is almost entirely coal mining, at $272m, with another $19m worth of mining and exploration support services. Mining activity is also recognised as being the highest employment sector within the Wollondilly LGA by a significant margin although this is also noted to be decreasing in recent years.

Data obtained from the NSW Department of Industry shows that approximately $55 million in royalties was reported for projects within the Wollondilly LGA during the 2014/15 financial year. Council has adopted the position that at least an appropriate portion of these royalties collected by the NSW Government should be returned. In this regard, Council lodged a submission in December 2013 to the NSW Trade and Investment that requested Council’s inclusion into the Resources for Region scheme. The submission expressed the view that mining activity imposes certain effects on the Wollondilly community and that these effects need to be addressed through additional Government support. Key recommendations contained in this submission were:

- **The financial position/asset backlog of affected councils should also be taken into account, in order to ensure that funding goes to those councils that have an identified need for additional funding support.**

- **The social and economic impacts to our community should also focus on the social impacts and disruption associated with damage to homes caused by mining, while it should also be acknowledged that residents face higher housing construction costs to cope with future mining subsidence impacts.**

Council also lodged a submission on the recently gazetted Community Funds Guideline associated with the NSW Gas Plan. Council did not oppose this Guideline in principle provided it did not apply to any new gas wells in accordance with its resolution that requests a moratorium on new coal seam gas activities.
(iii) Council position on social and environmental aspects

Council has lodged a high number of submissions on applications associated with local mining and csg projects as well as Government reforms to the policy and regulatory framework associated with each of these industries. These submissions have raised a number of inconsistencies in the assessment approach and/or level of approach with the concerns and position of Council and the local community. The major areas of concern for Council and the community outlined in these submissions are:

- The adequacy of baseline data and scientific basis of the assessment of potential impacts to water sources by both csg and underground mining activities.
- Emissions and associated health impacts associated with csg operations (both venting and fugitive emissions) and underground mining operations (including emissions from gas drainage programs).
- The assessment, management and rehabilitation of subsidence related impacts to the natural, cultural and built environment.

SUMMARY STATEMENT ON COUNCIL POSITION

Council is supportive on economic development and the carrying out of mining activities within the Wollondilly LGA provided such development is carried out in a manner that addresses the concerns of the local community and does not adversely impact on the natural, cultural or built environment. Council is opposed to any new coal seam gas activities until it can be demonstrated that the industry will not have any unacceptable social and environmental impacts.

2) Council position on the Economic Assessment Guidelines

The application of the Guidelines to both coal mining and coal seam gas is consistent with views expressed in Council’s submissions on documents associated with the IMP and the NSW Gas Plan. In this regard however, a number of these submissions have requested clarification over the relevance of the application of the Strategic Regional Land Use Policy to both these Policies. They have also suggested that the Policies be integrated given both csg and mining projects are assessed and approved under the same legislative framework. A response by the DP&E to these matters prior to the finalisation of the Guidelines would be appreciated.

Council’s submissions on mining and csg applications have expressed its view and advocated the concerns of the local community that EIS’s must contain a rigorous appraisal of all economic, social, environmental and cultural factors. They have also requested more specific localised and detailed assessment as well as more consultation with Council and the local community. The Guidelines are consequently supported in principle as a means of responding to these concerns by providing an overview of the impacts and benefits of mining and csg projects within a localised context.

In relation to this matter, an absence of specific guidelines for applications where Council is the determining authority has been observed to often result in large commercial development applications being deficient in the assessment of associated economic, social
and environmental impacts and benefits. The extension of the broad approach adopted by the Economic Guidelines to such applications would therefore be supported in principle.

3) General comments on the Guidelines for the Economic Assessment of Mining and Coal Seam Gas Proposals

(i) Purpose of the document

The purpose of the Guidelines is noted to be to “assist proponents with providing the necessary information to allow consent authorities to consider certain requirements of Section 79c of the Environmental Planning and Assessment Act 1979 in determining a development application”. Council does not require Benefit/Costs Analysis for commercial type developments where it is the consent authority. However, the stated purpose of the document is agreed as having benefit in enabling the Government agency consent authorities to obtain a detailed understanding of the likely environmental, social and economic impacts of a development in a certain locality.

(ii) Comments on the approach adopted by the Guideline

The use of the CBA to assess the public interest of a particular project to the NSW community through the calculation of a Net Present Value is not opposed in principle. The procedures outlined in the Economic Guidelines have been identified by Council’s Economic Development Section as being consistent with the standard practice of economic assessment. However, Officers are aware of statements by economists with experience in CBA’s regarding the difficulties of this approach in adequately quantifying the benefits and costs of environmental and social issues. It is noted the exhibited Peer Reviews contain a number of statements to this effect. The approach is therefore considered subjective without sufficient scientific basis and open to different degrees of interpretation.

The Guidelines is noted to contain a number of statements to the effect that the purpose of the Local Effects Analysis is to identify the potential benefits and impacts of projects to communities on a localised scale as well as to inform communities on these matters. However, the ability of the broader community to understand an Economic Assessment is viewed as being hindered by the highly technical and jargon based nature of the document. It is therefore recommended that the document be amended or alternatively a Plain English summary be produced that is easy to understand without an understanding in the principles of Benefit-Cost Analysis.

Summary statement on Council’s position regarding the Economic Guideline

The adopted approach is recognised as having benefit in enabling a consent authority to determine the overall benefits and impacts of mining and csg projects on a localised scale. However, there are strong concerns that the Guidelines as exhibited will not provide an accurate identification of social and economic impacts associated with such projects. Council also has concerns that the highly technical nature of the Economic Assessment prepared in accordance with the exhibited Guideline will not be readily understood and interpreted by the broader community.
4) Comments on specific components of the Guidelines

(i) Estimating the broad economic value of a particular project (Section 3)

Council’s Economic Development Section has reviewed the intended procedures for the analysing of the economic value of mining and csg projects. This review identified the approach as being broadly adequate in identifying the broad economic value of these projects within a localised context. The following comments consistent with previously expressed concerns of Council are however provided for consideration and response by the DP&E during the finalisation of the Economic Assessment Guidelines:

- Members of the community are noted to have raised questions over the accuracy of previous mining applications in calculating the employer multiplier effect. To strengthen confidence in Economic Assessments and to ensure economic risk and benefits of the are correctly identified, Council consequently suggests that such Assessments be required to contain:
  - A sensitivity analysis of the multiplier variable within +/- 10%;
  - A literature review identifying situational analysis of high and low range of multipliers used for similar projects; and
  - An explanatory note as to why the multiplier variable is appropriate for the project scenario.

- Council is strongly pursuing the inclusion of Wollondilly LGA in the expanded version of the Resources Region to allow for the reimbursement of social, economic and environmental impacts and benefits associated with mining and csg operations to the local community.

(ii) Surrounding land uses (Section 2)

The Wollondilly LGA is a peri-urban LGA with a range of competing land uses that include agriculture activity, water supply catchment areas, existing and proposed residential development in addition to mining and csg activities. It is therefore viewed as important that Economic Assessments consider coexistence issues to enable an accurate identification of the benefits and impacts of mining and csg projects on a localised scale. The inclusion of a Section in the Economic Guidelines requires the consideration of these issues is consequently welcomed in principle.

The Economic Guidelines is however noted to state “focus should be placed on impacts that are likely to be of material relevance the CBA”. It is further noted to state in this regard “where third party impacts of the existing land use are not quantified, a CBA of a mining or csg project implicitly assumes no third party impacts under the existing land use”. Officers have concerns this intended approach may result in Economic Assessments concluding that proposals do not have ‘third party’ social and environmental related impacts as discussed below.

(a) Socio-economic considerations

It is acknowledged that an economic value can be assigned to monitor in part social impacts of mining in terms of expenses incurred in the rehabilitation of structures impacted by mine subsidence. It is also acknowledged that an economic value can be assigned to expenses incurred and income obtained in regard to property access issues associated with both
mining and csg operations. However, the recognised shortcomings of the CBA approach in accurately identifying social impacts is considered to have potential adverse implications to accurate identification of the relationship in terms of potential impacts (and any benefits) of mining and csg operations to adjoining land uses. The following recommendations consistent with the previously expressed position and concerns of Council are consequently provided for response by the DP&E during the finalisation of the Economic Guidelines.

- The potential socio-economic impacts of mining and csg projects to the value of agricultural land and its productivity should be required to be considered and quantified by Economic Assessments.
- Consultation with applicable local governments and Government agencies to obtain an accurate understanding of all current land uses potentially impacted by proposed projects (including current and future development) should be required during the preparation of Economic Assessments.
- ‘Third party’ socio-economic impacts should be quantified during the appraisal of environmental, heritage, social and transport impacts (Section 5 of the Guidelines).

(b) Environmental considerations

Council has expressed the view in a number of submissions on mining and coal seam gas proposals that the assessment process needs to consider environmental off-site potential impacts such as receiving water sources. In relation to this matter, the World Heritage listed Thirlmere Lakes National Park located in close proximity to current mining operations contains a number of groundwater dependent lakes. Council shared the concerns of the local community over the impacts of aquifer interference activities on the condition of these lakes which occurred during 2012. Council has resolved in response to these concerns “to advocate on behalf of the Community for research to be undertaken to understand the water losses at Thirlmere Lakes and the impacts of that on the community and natural environment of the area”. It is consequently recommended that the DP&E amend the Guidelines to require Economic Assessments:

- Consider as accurately as possible all potential projects to existing land uses including existing and future residential development.
- Consider off-site impacts to environmental assets as third party impacts and that these impacts be listed in the requested (by Council) summary of social and environmental impacts with the completed Economic Assessment.

(iii) Local effects analysis (Section 4)

The stated broad purpose of the Local Effects Analysis to “Translate the effects estimated at the State level to the impacts on the communities located near the mine site” is consequently supported in principle. However, the following provides comments and requested amendments to enhance the consistency of this Section of the Guidelines with the previously expressed position of Council based on the structure of this Section of the Economic Guidelines.

(a) Informing the community
The Economic Assessment Guidelines is noted to propose that the Statistical Area Level 3 be utilised to define the locality of a proposal in accordance with the requirements of the Environmental Planning and Assessment Act 1979. This Statistical Area is however not considered suitable to obtain a sufficiently accurate understanding of the features of a local region where a project is proposed as well as the identification of impacts and changes. **It is recommended in this regard that Local Government Areas be utilised as the basis to define the locality of a region.** This approach would have benefits in allowing the Economic Assessment and related consultation to be consistent with applicable local government documents and policies such as the Community Strategic Plan.

The Economic Guidelines is noted to list ‘inform communities’ as one the intended objectives of the Local Effects Analysis. However, there is an apparent absence of detail within the Guidelines on the purpose of such community notification and how this will occur. Wollondilly Council in relation to this matter has a Community Engagement Policy, which provides an overall framework for community type activities it carries out. **The DP&E is consequently recommended to require community notification activates be carried in accordance with any procedures or guidelines adopted by applicable councils.**

*(b) Estimation of local economic impacts and changes*

**Local economic impacts and changes**

It is considered the Guidelines do not include sufficient detail to assist Economic Assessments in evaluating the economic impacts from subsidence attributable to underground coal mining operations. In this regard, subsidence associated with underground mining operations within sections of the Wollondilly LGA routinely result in impacts to Council owned assets (largely roads) as well as private structures. Recently released reports associated with the Greater Macarthur Investigation Area are noted to contain a detailed management process for the management of these impacts. It is strongly considered that any expense in relation to this matter should be viewed as an economic impact associated with a particular proposal.

In relation to this matter, the Mine Subsidence Board (MSB) has been observed to fully reimburse Council for expenditures incurred as a result of subsidence which largely relate to road maintenance. Any future reduction in this full reimbursement by the MSB would be of great concern to Council. It is recommended in this regard that any expenditure incurred by councils that are not reimbursed be considered as an economic impact by Economic Assessments.

**Local social and environmental impacts and changes**

The Guidelines is noted to state on Page 31 that "Externalities (environmental and social impacts) is thoroughly investigated by Section 5 of the Guidelines". The procedures for individual issues outlined in this Section are considered broadly consistent with the applicable policy and legislative framework. However, recommended amendments to enhance the consistency of these procedures and level of detail of analysis with issues raised in previous Council submissions are outlined in below in regard to Section 5 of the Guidelines.
It is the view of Council that expressed community concerns regarding social impacts of csg (including health impacts) and mining (such as subsidence related impacts) should be analysed by Economic Assessments. However, Section 5 of the Guidelines is viewed as not containing specific requirements for the investigation of these impacts by Economic Assessments. Council's submission on Stage 1 of the Integrated Mining Policy in this regard, recommended that EIS's contain a Social Impact Statement consistent with Best Practice Guidelines. It is consequently recommended that the identification of local social impacts from mining as well as csg proposed projects as part of the Local Effects Analysis as well as Appraisal of specific impacts be informed by such a Statement.

The stated intent for "Local employment and income effects" and "other local industry effects" to be analysed to identify the effects experienced by local people as a result of the proposal is supported in principle. However, these items while supported are viewed as not analysing indirect social impacts and changes of mining and csg proposals such as changes to the character and amenity of the local neighbourhood. **It is therefore recommended that the Local Effect Analysis also be required to consider indirect social impacts that are identified in consultant with the applicable council.**

(iv) **Appraisal Guidelines for environmental, heritage, social and transport impacts**

(Section 6)

(a) The overall approach for the appraisal

The intention for Economic Assessments to contain an appraisal of environmental impacts is supported in principle. This in-principle support is however on the strict condition that the Assessment and adopted CBA approach must not in any form adversely impact the adequacy, and scientific rigour of assessment of the assessment of all potential impacts associated with proposals by Environmental Impact Statements. Table 1 in this regard provides comments on identified areas of concern on the proposed approach by the Guidelines consistent with the previously expressed position of Council and the local community.

**Table 1: Comments and recommendations on aspects of the proposed approach**

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<th>Identified issue</th>
<th>Adequacy comments</th>
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<td>The Guideline is noted to state that &quot;impacts across the various types of costs and benefits (for a project) will be converted into a common unit (Net Present Value)&quot;.</td>
<td>The supply of a Net Present Value is not considered suitable to provide a definitive objective transparent statement to enable a consent authority and other stakeholders to assess the economic, social and environmental impacts and changes on a local and regional scale.</td>
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<td>The Guideline is noted to state that &quot;it is not appropriate to include the value of environmental impacts that will be mitigated or managed by strategies implemented as part of the project's operations&quot;.</td>
<td>Mitigated impacts such as biodiversity offsetting are viewed as still resulting in impacts associated with a proposal. It is therefore the preferred view of Council that all impacts (whether mitigated or un-mitigated) for a particular proposal be appraised</td>
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To address concerns raised in Table 1, it is considered appropriate that Economic Assessments be required to contain a more objective, transparent description of environmental and social impacts derived from an Environmental Assessment for individual
mining and csg projects. It is strongly recommended in this regard that such Assessments address all issues raised and recommended amendments contained in Council's submission on the Standard Secretary Assessment Requirements. It is further recommended that Economic Assessments be required to contain an accompanying "Environmental and Social Impact Statement (or equivalent) which provides a definitive statement on potential impacts that can be readily understood and interpreted by members of the community.

(b) Comments on the proposed Workbooks

The need for a Workbook approach is acknowledged as being appropriate to obtain a level of uniformity in the identification of environmental impacts and changes associated with mining and csg projects. However, the adoption of this approach is considered likely to result in a Unit that does not adequately quantify a particular impact given that the subjective nature of the criteria and their openness to a range of interpretation.

A number of statements in the Guideline to the effect that the appraisal does not replace the Environmental Impact Assessment Approach is supported. However, the Economic Guideline is further noted to state in relation to this matter that "More detailed analysis or completion of primary studies may be required only in certain circumstances namely when the proposed project is likely to be significant or when the site specific environmental impacts are not adequately captured by existing economic values". Officers have concerns that this proposal may only result in detailed analysis only occurring in certain circumstances with potential adverse implications for the identification of environmental as well as social impacts associated with mining and csg projects. It is therefore recommended that the appraisal for individual impacts be informed by Environmental Impact Statements under all applicable circumstances.

(c) Comments in regard to individual items

The above discussion has highlighted in principle support by Council Officers to the consideration of social and environmental impacts by Economic Assessments. This discussion has also raised the deficiencies of the BCA in adequately identifying these impacts. However, the appraisal guidelines and associated Workbooks have been reviewed in terms of consistency with the concerns of Council and the local community in regard to those impacts of relevance to the Wollondilly LGA. In this regard, Table 2 provides recommended amendments to the Appraisal Guidelines to address identified inconsistencies with these concerns.

Table 2: Comments on appraisal guidelines in regard to impacts of relevance to the Wollondilly LGA

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<th>Key potential impacts of csg and mining operations</th>
<th>Comments regarding attended appraisal approach for key potential impacts</th>
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<td>Potential impacts of mining and coal seam gas operations on surface and groundwaters and the level of understanding of the features and behaviour of groundwater.</td>
<td>The Appraisal be consistent with current scientific knowledge and research as well as consider assets associated with the Commonwealth Department of Environment's Bio Regional Program. The Appraisal be informed by detailed modelling of groundwater behaviour in a later and vertical context which is supported by suitably extensive groundwater monitoring.</td>
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<tr>
<td>Key potential impacts of csg and mining operations</td>
<td>Comments regarding attended appraisal approach for key potential impacts</td>
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| Potential air quality emissions associated with coal mining (including emissions as part of gas drainage) and coal seam gas (including venting and fugitive emissions). | The Appraisal consider baseline monitoring and modeling for any mining development that involves the emission of pollutants.  
The Appraisal consider any carbon based pollutants (including methane) associated with a mining development as well as coal seam gas (venting and fugitive emission) given their potential health and environmental risks. |
| Potential impacts of mining (including subsidence related impacts) and coal seam gas operations on biodiversity including the implementation of adequate measures to avoid or mitigate impacts prior to pursuing offsetting. | The appraisal consider local government strategies and mapping of biodiversity to obtain local data and identify localised impacts.  
The appraisal identify measures on a localised scale to avoid and mitigate biodiversity impacts on a localised scale prior to pursuing biodiversity offsets.  
The appraisal consider localised potential subsidence related impacts based on detailed groundwater analysis. |
| Potential subsidence related impacts from underground mining operations on the natural, cultural and built environment and the adequate rehabilitation of these impacts | The appraisal consider subsidence related impacts to all potentially affected structures as well as associated social impacts based on latest scientific knowledge and applicable Guidelines.  
The appraisal consider any out-of-pocket expenses not reimbursed by the Mine Subsidence Board or equivalent process.  
The appraisal consider the rehabilitation of impacts that are attributable to mine subsidence to the built and natural environment. |

It is recommended that the DP&E consider the concerns and position of Council and the local community it represents outlined in Table 2 during the finalisation of the Economic Assessment Guidelines. The provision of the viewpoint of the DP&E to Council in relation to these concerns would be appreciated.

Summary statement regarding individual components of the Economic Guidelines

The Economic Guidelines are viewed as being broadly adequate in identifying potential economic benefits and impacts apart from those related to subsidence attributable to underground mining operations. Recommended amendments are provided to enhance the adequacy of the Local Effects Analysis and investigation of social and environmental impacts to address identified consistencies with the concerns of Council and the community that it represents.

5) Concluding statement

Council welcomes the preparation of the Economic Assessment Guidelines in principle as a means of obtaining an understanding of the social, economic and environmental impacts and benefits associated with mining and coal seam gas operations within the Wollondilly LGA. The adopted Cost-Benefit Analysis approach has been identified as being adequate in identifying and quantifying the economic benefits and values of mining and coal seam gas operations in a localised context.
However, as is noted to be recognised by exhibited peer reviews, the Cost-Benefit Analysis has shortcomings in the quantification of social and environmental impacts of both mining and coal seam gas operations. This submission consequently recommends that Economic Assessment applications also provide a summary of these impacts which is informed by studies associated with the development assessment process to enhance their objectivity as well as its interpretation by the broader community. This submission also outlines a number of recommended amendments to the identification of third party impacts and intended appraisal process for specific impacts to enhance consistency with the concerns of Council and the community it represents outlined in previous submissions.
ATTACHMENT 2

RESOLUTIONS OF COUNCIL

Coal Seam Gas Exploration and Production

Resolutions of Council at its meeting of November 2011

Wollondilly Shire Council recommends that The NSW Government should:

1. Impose an immediate moratorium on all further Coal Seam Gas development until it can be demonstrated that the industry will not have any unacceptable social and environmental impacts.

2. Implement a robust, transparent and independent assessment of the environmental impacts of Coal Seam Gas extraction.

3. Establish an Assessment Commission to undertake this independent assessment.

4. Investigate the impact of the levels of water extraction on the aquifers, surface waters and their connectivity and the security of the water resource for both consumptive and environmental purposes in the short, medium and long term.

5. Investigate concerns about the use and disposal of salt and other materials contained within coal seam gas generated waste and waste water and develop systems to ensure its reduction, treatment and disposal compliance.

6. Develop robust regulations for the Coal Seam Gas industry ensuring parity to Local Government Planning controls and other environmental regulations, including State controls, placed on landholders and the community including water access rights.

Resolution of Council at its meeting of March 2012

1. That the Federal Government are written to regarding a right of an individual to shut the gate on their property in regards to resources and choose whether or not to allow entry to anybody or organisation.

Resolutions of Council at its meeting of April 2012

1. That Council be proactive in its response to CSG exploration and extraction licence applications in the Shire.


3. That council continue to lobby the State and Federal Governments to give communities and Local Government a more appropriate role in the consultation, assessment and possible approvals of CSG operations in their areas.

4. That Council extend an invitation to the surrounding local Councils of Campbelltown, Camden, Wollongong and Wingecarribee to become a regional voice in the advocacy role in understanding and commenting on CSG within the area.
Resolution of Council at its meeting of 18 June 2012

1. That Council write to State Member Mr Jai Rowell MP, requesting that the Minister for Planning develop a strategy for Strategic Regional Land Use Planning for the Wollondilly Local Government Area.

Resolution of Council at its meeting of October 2012

1. That Council propose a special community forum to discuss the impact of CSG on the Shire, especially in the drinking water catchment. That this forum be videotaped.

Resolutions of Council at its meeting of October 2013

1. Wollondilly Shire Council write to the Mayor of Wollongong City Council and pledge support in his endeavour to get Sydney’s drinking water supply protected from Coal Seam Gas exploration and extraction.

2. Wollondilly Shire Council representatives join with Mayor Bradbury, or as an individual council, meet with The Premier to request a ban on CSG mining and exploration in the Catchment.

Resolution of Council at its meeting of June 2014

1. Wollondilly Shire Council joins with Griffith and Wollongong Councils in their action to lobby Federal Government to ban CSG in our drinking water areas and if unable to attend a letter of support be sent to both Councils and the Executive.

Resolutions of Council at its meeting of 17 November 2014

1. That Council reaffirm its six resolutions of its meeting on 21 November 2011 defining its position on the CSG industry in response to the findings and recommendations of the Final Report produced by the Chief Scientist that includes a request:

   That the NSW Government impose an immediate moratorium on all further Coal Seam Gas development until it can be demonstrated that the industry will not have any unacceptable social and environmental impacts*.

2. That the State Government review and alter its NSW Gas Plan to accommodate Wollondilly’s concerns.

3. That pursuant to Recommendations 1 and 2, Council send correspondence to the NSW Premier that:

   - Welcomes the release of the Final Report and provides broad support to the findings and conclusions of the Review.
   - Advises the Government of its reaffirmation of its adopted position regarding the CSG industry in response to the findings and Recommendations of the Review.
   - Requests that the NSW Government support all recommendations of the Review subject to these recommendations being considered and implemented in conjunction with Council’s adopted position and issues raised in its submissions.
   - Opposes the implementation of Recommendation 5 of the Review regarding the designation of low risk areas in NSW where CSG is permitted until
Council is in receipt of independent advice that demonstrates applicable Council resolutions as well as findings of the Review have been adequately addressed.

Resolutions of Council associated with Mining Exploration and Production

Resolutions of Council at its meeting of 16 March 2009

1. That Council write to the Minister and Shadow Minister for Mining requesting that Councils be compensated through mining royalties and the Mine Subsidence Board for the additional cost of infrastructure projects.

2. That Council support the Association of Mining Related Councils in their endeavour to get a percentage of the mining royalties for such instances.

Resolution of Council at its meeting of 14 August 2009

1. That Wollondilly Shire Council write to the Minister for Primary Industries and Shadow Minister for Climate Change and Environmental Sustainability expressing its concerns over the recent cracking of Myrtle Creek.

Resolution of Council at its meeting of 19 October 2009

1. That Wollondilly Shire Council write to the Minister for Planning and Shadow Minister for Planning calling for third-party appeals to be allowed for Part 3A processes or that Part 3A be removed from NSW Government Policy.

Resolution of Council at its meeting of 15 November 2010

1. That Council send correspondence to the Minister for Planning requesting that a new Part 3A application be lodged for the Bulli Seam Project, given the significant changes to the original application by the proponent and the flaws in the original exhibition process.

Resolution of Council at its meeting of March 2013

1. That Wollondilly Council write to the Minister of Regional Infrastructure and Services requesting a review of the methodology used to classify the ‘tiers’ of Mining Affected Communities and expressing its concern at the relegation of Wollondilly’s Community to Tier 3, excluding it from any support from the Resources for Regions Programs.

Resolution of Council at its meeting of 11 December 2014

1. That Council write to the Minister for Primary Industries and the Minister for Planning requesting that the impacts on communities and infrastructure from coal mine gas drainage be included in the criteria for Local Government assistance through the Resources to Regions Program.

Resolution of Council at its meeting of 16 March 2015

1. Council convene a meeting with invited community members of Douglas Park and representatives of Illawarra Coal to facilitate a consultation between the parties regarding Illawarra Coal’s proposed gas extraction and power plant development in the Douglas Park area.

Resolution of Council at its meeting of 20 July 2015
1. That Council write to the Federal Minister for Environment, the Federal Minister for Agriculture, the NSW Minister for Planning, the NSW Minister for Primary Industries and the NSW Minister for Industry Resources and Energy in regard to the approval of the Shenhua Watermark mine on the Liverpool Plains to:
   • Express dismay regarding the approval of the mine on the Liverpool Plains by the Federal Government given the region's major role in Australia's food production balanced with a vulnerable environment and the unacceptable risk to this balance that the mine may cause.
   • Express its concerns that in a local context, the productive peri-urban areas of Sydney are also being threatened by unsympathetic land uses.

Resolutions of Council at its meeting of 20 July 2015

1. That Council endorse the submission on exhibited components of the draft Integrated Mining Policy.

2. That Council send correspondence to the NSW Minister for Planning tat:
   (a) Acknowledges the benefits in introducing the Integrated Mining Policy.
   (b) Expresses disappointment that the exhibited Policy has not addressed issues raised in previous Council submissions.
   (c) Advises that Council is not able to finalise its position until all documents associated with the Policy have been publicly exhibited and submissions received.
   (d) Stresses the importance of the inclusion of all stakeholders in the notification process.

Resolutions of Council at its meeting of 8 September 2015

1. That Council continue to monitor the Douglas Park Mine Gas Drainage and Power Plant Proposal by South 32 and that Council continue to engage with residents of Douglas Park regarding their concerns about the proposal.

2. That Council throughout the process, advocate on behalf of the community, communicating their concerns to the consent authority, our state member, mining authority, and any other applicable minister/authority.