



environmentally concerned citizens of orange

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Director, Regions, Central West & Orana
Dubbo, NSW, 2850
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Dear Sir/Madam

Re: Draft Central West/Orana Regional Plan

Thank you for providing our organization the opportunity to comment upon the above document.

Environmentally Concerned Citizens of Orange is a community based not-for-profit organization launched in 2006. ECCO is made up of volunteers committed to promoting environmental values in Orange and surrounding district. As such we welcome the opportunity to make comment on the Draft Plan , and to express the following concerns.

Inadequate protection for the environment

It is commendable that the plan recognizes that areas of high environmental value exist within our region. However, having done so, it does not go beyond identifying them (figure 17: Environment. p. 66/67). There is no mention of places that are off limits completely, nor are there clearly stated restrictions on development which could jeopardise their existence.

Failure to resolve land use conflicts

As well as areas of high environmental value, the plan identifies land which is valuable as water catchment. Areas such as biophysical agricultural land, forestry, mineral resources, coal mining, petroleum etc are also identified. This is obviously a mixture of land uses which are not always compatible. Unfortunately, apart from identifying the various areas and stating the obvious, i.e. that conflict is likely to occur concerning the values inherent in such diverse land use, the report does not mention any planning or direction concerning how this conflict may be resolved, preferring to defer such concerns.

Failure to link catchment management planning and natural resource management

Important catchment management plans already exist. These plans have goals and objectives which have been thoughtfully developed using input derived from thorough research and existing knowledge going back many years. The report makes no reference to these plans, giving the impression that those who compiled it were unaware of the wealth of knowledge that is currently available to assist with management., or, alarmingly, deliberately chose to ignore such information.

Coal mining

It should be alarming to any environmentally concerned individual or group to read in the report that coal mining is regarded as an ongoing priority industry for the region. There exists abundant evidence that coal is a major contributor to climate change, and a serious obstacle to our commitment to keep global temperatures below two degrees centigrade. We are also confronted with evidence that coal prices are falling as the world moves away from investment in coal. It is therefore irresponsible to identify coal as an industry which should be given priority in our region. Instead there should be a plan for how this region can transition away from fossil fuels.

Water resources and drinking water catchments

Water management in this region is a constant source of concern. There are severe constraints placed on water availability and use in this region. Priority must be given to environmental and potable water management. There is currently in this region too much importance placed on water use for mining, and the threat to the water table through coal seam gas has not been adequately addressed.

The draft plan does not provide adequate protection from mining for the region's water. The only way this can be done is to specifically ban coal and coal seam gas mining from identified important water catchment areas. Witness recent damage from coal mining to the Waragamba catchment.

Preservation of traveling stock reserve network

We congratulate the report for acknowledging the importance of the preservation of the traveling stock reserve network. The environmental, cultural and social value of such reserves is well documented.

We look forward to receiving further information about how adequate preservation and maintenance of these important areas is to be achieved, and how traveling stock reserves are to be protected from inappropriate use.

Climate Change

We note that the plan acknowledges the existence of climate change and the fact that our region will be impacted, as will the rest of the planet. We support the ideas associated with building resilience to anticipated changes in our climate. We feel that there should be more mention about what we as a region can do about reducing our regional effect on climate and how we can reduce our regional emissions. We also would have liked to see more emphasis on how we as a region can respond to the challenges and opportunities provided by a future climate change scenario.

Renewable energy

One such opportunity is that of the development of renewable energy in our region. The document is supportive of renewable energy. However, while the plan acknowledges the renewable energy assets in the Central West and Orana regions, it does not outline a clear strategy about how our region is to develop a future renewable energy industry.

Summary:

The draft plan has the potential to be a valuable document that has the capacity to inform and guide future management of the resources in our region. However, if the plan is to operate to its full potential, and the environmental assets and values of our region are to be protected, the above issues need to be given more careful consideration.

Nick King

President, Environmentally Concerned Citizens of Orange.