

## **EIA IMPROVEMENT PROJECT SUBMISSION BY GROUNDSWELL GLOUCESTER**

### **BACKGROUND**

Groundswell Gloucester (GG) is an incorporated association based in the Stroud-Gloucester valley on the NSW mid-north coast. The objects of the association are:

- to protect and preserve those characteristics of our community and environment which are valued by the residents; and
- ensure for present and future residents, a satisfactory level of health and general wellbeing within a liveable environment underpinned by a sustainable local economy.

GG's experience of the EIA process has been in relation to resource extraction projects, particularly coal mining and coal seam gas extraction, and this experience guides the following comments.

The Stratford Extension Project (SSD-4966) exemplifies many of the weaknesses in the present EIA process.

GG has long championed the need for a significant overhaul of the EIA process and generally supports the scope of the project as outlined in the Discussion Paper. Our major concerns are listed below.

### **CONCERNS**

**The EIA is a sham process – being seen to be consultative rather than a genuine opportunity for community views to be considered.**

The EIA is a “done deal” between DPE and the proponent at the scoping stage, with no possibility of the project's being rejected. The subsequent exhibiting of the EIS for public comment is seen to be little more than “process” with objections and suggestions being ignored and projects approved regardless.

In the case of the Stratford Extension Project, both Gloucester Shire Council and the Barrington-Gloucester-Stroud Preservation Alliance made substantive submissions on the EIS. Contributors to those submissions from within the community had expertise in the areas of economics, health, environmental management, ground and surface water hydrology and rural resource management. Consultants were also engaged to assist the evaluation of the acoustic impacts and socio-economic justification of the project.

Yet none of the Council's 85 recommendations concerning proposed conditions of consent was adopted by DPE in its recommendation to the Planning Assessment Commission. It simply endorsed the proponent's proposals as outlined in the EIS. In fact much of the DPE's Assessment Report content was simply lifted directly from the proponent's Response to Submissions.

It beggars belief that the DPE could find absolutely nothing of merit in the Council's submission.

### **The EIA process is too narrow in scope.**

The EIA grossly underestimates the actual “footprint” of a mine – in a quiet rural environment intrusive noise travels a very long way. The decline in property values and saleability of properties within this footprint is ignored, in fact denied by DPE.

Impacts on landholders actually begin at the time an exploration licence is granted, especially in areas where mining is already extant. Coal measures are already well known. The purpose of exploration is to define and quantify the resource for preparation of a development application. It is often the case that a couple of key properties are purchased at this time, often at inflated prices. Remaining landholders are left in limbo.

The most insidious impact is the fact that the landholders’ capital investment in their properties becomes frozen. Proximity to a coalmine and the possible future development of a coalmine does not attract buyers.

Within proximity of the Stratford Mining Complex, landholders have been living in limbo for more than 10 years, unable to sell and uncertain whether to commit to capital investment in their properties.

### **The EIA process is not holistic in its assessment of the socio-economic impacts on a community.**

The socio-economic assessment for each resource extraction project should clearly demonstrate to decision makers that the cost the local community must bear, in loss of amenity, damage to health and reduced financial values of properties, is justified by the benefit to the wider community. Invariably, they do not.

There is never any consideration of the negative economic consequences of landholders being displaced and moving from the area when properties are purchased for mining activities.

There is token consideration given to the impacts of resource extraction development on the existing economic and social fabric of communities.

In Gloucester, Engineering firms have found it difficult to retain apprentices after completion of their training because they have been lured away by the higher wages offered by Stratford Coal. Tourism and life-style relocation, important contributors to the Gloucester economy, will be severely impacted by mining expansion.

### **The EIA process does not consider the cumulative impacts of either multiple resource extraction projects or the forecast future expansion of single projects.**

In 1995 the Gloucester community was asked to accept a “boutique” coalmine that was to have a limited impact and short life, after which the land was to be returned for farming. Instead, as a result of subsequent expansions and developments, mining and attendant coal handling and processing has extended way beyond the time frame that the community was originally asked to support.

Further extensive exploration has apparently identified significant coal reserves - which have been duly reported to the ASX - and Stratford Coal has publicly stated its intention to continue mining until 2030 and beyond.

Yet there was no mention of this in the EIS for the Stratford Extension Project beyond a cursory reference to ongoing exploration. Residents were asked to support the continued and expanded operation of the Stratford Mining Complex for a limited time, without being provided the full facts.

The stress and uncertainty caused by this piecemeal expansion has previously been raised with officers of the DPE who acknowledged the concerns.

The EIA should consider each specific project within a realistic context that explains the proponent's future plans and the cumulative impacts of adjacent mining activity. The documentation should include details about issues such as the identified coal reserves and likely future mining projects.

**The EIS is too long and complex to realistically allow community review and input. It has become an advocacy document rather than an independent assessment of a proposed development.**

In responding to a number of resource extraction projects that have been presented for public comment over the last decade, the Gloucester community has been fortunate to have within its midst, people with expertise in the areas of economics, health, environmental management, ground and surface water hydrology and rural resource management. Where local expertise has been lacking, consultants have been engaged.

In our experience, each EIS has been seriously deficient. In general they overstate the economic benefits of the project, understate the negative health and welfare impacts and ignore or trivialise most of the environmental impacts that will affect the wider community.

**The response to submissions on the EIS is woefully inadequate and neither the project proponents nor the DPE address the substantive concerns raised by objectors.**

In the case of the Stratford Extension Project, the community attempted to deal with the matters raised in the EIS in a constructive manner. Detailed comments about specific issues and proposed alternative mitigations or recommended conditions of consent were provided.

Yet the proponent did not attempt to respond in any meaningful way to the issues raised in the substantive submissions. The standard response was to say that "no one else has raised these concerns" and to then restate the information provided in the EIS.

Perhaps more alarmingly, the DPE's Preliminary Assessment contained surprisingly few references to and very little analysis or discussion about matters raised in the substantive submissions. Much of the text was simply lifted directly from the proponent's Response to Submissions.

One can't help but conclude that in this aspect of the process, DPE is revealing itself to be an industry advocate and apologist rather than an honest broker.

The advice of specialist agencies seems to be similarly ignored. The DPE's Preliminary Assessment noted that while no government agencies objected to the proposal, most raised concerns about potential impacts, and recommended conditions to be applied should it be approved. However many of the issues raised by the specialist agencies were not reflected in the DPE's proposed conditions of consent.

## **RECOMENDATIONS**

A recommendation naturally follows from each of the concerns discussed above and should not need not to be restated.

However, in the interests of clarity Groundswell Gloucester wishes to highlight four imperative recommendations:

- Scope of the EIA process to be broadened considerably;
- Genuinely independent socio-economic, health and environmental impacts to be assessed and presented for public scrutiny;
- Proponents to be required to respond to specific concerns raised by objectors and specialist agencies;
- DPE to be an honest broker, prepared to recommend that a project not be approved if circumstances warrant.

Unless this project seriously addresses these concerns and empowers the community to have serious and influential input to the process, then it will be a complete waste of time.