



RIVERS SOS

P.O. Box 73  
Douglas Park 2569

## **SUBMISSION RE COAL AND GAS STRATEGY**

### **Introduction**

The Rivers SOS Alliance of 47 groups around NSW welcomes the opportunity to have input into the Coal and Gas Strategy. We hope that the incoming NSW Government will continue this current process, and in this hope we have prepared the following submission.

The Rivers SOS Alliance was formed with 13 groups in 2005, and the network has grown ever since. Coal mining, underground and open cut, has been our major pre-occupation. We campaign to stop the irreversible damage done by mining to our water sources. However as coal seam gas operations have expanded rapidly, and as the damage that CSG methods and chemicals do to groundwater and agricultural land has become apparent, we now have a number of groups focussing on CSG in our network as well.

We seek a balance between the environment and the mining industry. We call for a 1 km safety zone around NSW's river systems in order to protect the state's water resources from loss of both quantity and quality due to mining operations of all kinds. For more information and evidence of past damage please see our web site: [riverssos.org.au](http://riverssos.org.au)

We hope that this process will help to redress the current imbalance, in which so many rivers, streams and swamps are suffering water loss and pollution due to reckless approval of 99% of mine plans put to the government. A responsible and balanced strategy would be an important move in the right direction. Such a strategy is long overdue and we look forward to swift government action.

Given our connection with so many community and environmental groups campaigning on this issue, we feel that we deserve to have a place on your Reference Group. Unlike other groups, we are entirely independent of government grants, and can speak out fearlessly on behalf of our grass roots organisations. The former Water Minister Phil Costa undertook to lobby for our inclusion on your Reference Group but of course is now out of office. We hope that you will consider this request.

### **The Planning Assessment Commission and its Panels of Experts**

It is our understanding that the O'Farrell government will overhaul and reform, but not abolish, Planning Assessment Commissions. Therefore we repeat a serious complaint which we previously put to Kristina Keneally when she was the Minister for Planning, and have subsequently put to current Minister for Planning, Brad Hazzard.

The PAC process of approving mine plans involves the appointment of so-called "independent" Panels of Experts to assess each plan and advise the government via their final reports.

Submissions from community groups as part of this process seem to have little effect on final outcomes. For example, where an EA has made it clear that certain mine plans will crack river

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*Rivers SOS is an alliance of over 40 groups committed to the protection of the integrity of river systems and water sources against the impacts of mining and other extractive industries*

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beds, submissions from groups like Rivers SOS call for extended safety zones around rivers. But our calls for damage prevention go unheard by the Panels of Experts in most cases.

Rivers SOS has analysed the makeup of these panels since the inception of the PAC in 2008, and we can give chapter and verse regarding a number of conflicts of interest concerning the personnel who are appointed. A majority of experts on these panels are men who have worked and will continue to work as consultants for the mining industry. In one case, a member of a panel assessing a Peabody mine in one area was at the time working for a Peabody mine in another area. This is patently unacceptable, and helps explain why most mine plans are approved with inadequate conditions attached to prevent unacceptable environmental damage, especially to river systems.

We provided the Minister and the Department of Planning with a list of experts who are truly independent and are willing to serve on these Panels, but no notice was taken and the same faces continue to be appointed.

We request that these Panels should at the very least be balanced. If not, we will continue to campaign against this obvious corruption of due process.

### **Representation of Key Stakeholders at the Coal and Gas Strategy Forums**

Rivers SOS representatives have attended the forums in all areas of the state. At the Wollongong forum it was noted and commented upon that the Sydney Catchment Authority was not present. We subsequently found out from an SCA senior manager that they were neither informed of the forum nor invited but that they certainly would have attended if they'd known about it.

As the SCA is the largest land manager and stakeholder in the Southern Coalfield we cannot understand why their attendance at the forum was not considered relevant. Their lack of representation detracted from an otherwise worthwhile event.

The following comments refer to specific sections of the Scoping Paper:

### **Government Initiatives to Address Community Concerns**

- **Clean coal** - We reject the notion of "clean coal". In our view coal can never be "clean" while its extraction methods cause the environmental damage to river systems that we see all the time. The Government would make better use of taxpayers' money if it invested the money going to clean coal research into renewable energy.
- **Rehabilitation of derelict mines** – We are well aware of the huge number of derelict mines throughout the state, especially those causing acid mine drainage into our river systems. A glaring example is on the Cox's R. within Sydney's drinking water catchment. Rehabilitation of these mines is proceeding at a snail's pace. The Derelict Mines Program needs a big increase in funding and resources to effectively tackle this ongoing legacy of past mismanagement.

### **Coal and Gas Industry Prospects**

The statistics presented on the projected growth of these two industries over the next 25 years are frightening. We know that key government agencies are currently struggling with the huge number of new development proposals before them, as well as maintaining their oversight of existing operations.

In order to adequately assess and monitor current coal and gas developments there needs to be an immediate significant increased resourcing of these key government agencies. This resourcing will need to continue to increase in order to keep pace with the projected growth of the industries.

### **Key Initiatives of the Strategy**

#### **13. Improving Communication**

- \* Improvements in the consultation between industry and the community -
- \* Improvements to the transparency of the industry, and public access to key information –

We note that Community Consultative Committees (CCCs) are not mentioned here at all. Rivers SOS has many representatives of our member groups on these committees throughout the state and we are aware that there is a wide disparity in their effectiveness in representing and dealing with community concerns to the extent that some committees are quite dysfunctional.

We are currently compiling information about the operations of CCCs in the coal and gas industry in NSW and intend to prepare a report with recommendations that should be useful to the Government regarding this aspect of the Coal and Gas Strategy.

### **Conclusion**

We welcome the initiative of the Strategy and expect the new government to continue its implementation. However, Rivers SOS would not like to see the Strategy develop primarily as a means of facilitating the massive predicted growth of the coal and gas industry.

There was a depressing feeling at the Forums that this growth was accepted (at least by the Dept of Planning) as inevitable and unstoppable. We would like to see much more focus and expenditure by the Government on lifting renewable energy targets so that this growth of the coal and gas industry is not required and the threats to our river systems and water resources are decreased.

Caroline Graham  
Vice President  
Rivers SOS

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