

**Submission
No 97**

INQUIRY INTO COAL SEAM GAS

Name: Mr Ian Simpson
Organisation: Northern Rivers Catchment Management Authority
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LEGISLATIVE
COUNCIL

Our Ref: OUT11/156
Your Ref: General Purpose
Standing Committee No.5

Ms Beverley Duffy
Director
Legislative Council
Parliament House
Macquarie Street
SYDNEY NSW 2000
gpscno5@parliament.nsw.gov.au

Dear Ms Duffy,

RE: COAL SEAM GAS INQUIRY - SUBMISSION

The following is a submission by the Northern Rivers Catchment Management Authority (NRCMA) to the NSW Legislative Council's General Purpose Standing Committee No.5 inquiry into Coal Seam Gas and letter dated August 18, 2011.

The NRCMA's objective is to minimise the impacts of mining and coal seam gas extractive operations on the natural resources of the northern rivers.

The term "mining" in the context of these guiding principles refers to operations such as quarrying, sand excavating, dredging or tunneling for the extraction of minerals, ore, precious stones, aggregate, fill or sand. Coal Seam Gas extraction is self explanatory in that it focuses on methane or gas extraction from coal seam deposits.

Mining has a long history of activity across the northern rivers and has provided significant social and economic inputs into the area. Mining can, if managed inappropriately, cause serious environmental damage to the natural resources of the region. It is in this context that the NRCMA has developed these guiding principles to be applied into development assessment processes for new proposals to assist in the environmental management of this industry.

The CMA understands and acknowledges that mining and extractive operations are highly regulated under NSW and Australian government legislation and policies which aim to minimise potential environmental impacts. Mining is nevertheless perceived by the community as a significant and growing threat to the regions natural resources if managed inappropriately.

The CMA recommends the following guiding principles be considered in the approval process for new developments and across existing operations. There are also significant derelict mines across the area, which need to be recognised and systematically addressed to minimise adverse impacts in accordance with these principles.

PRINCIPLES

1. Any mining or coal seam gas proposal needs to have a detailed assessment and investigation of any potential negative environmental impacts at the site and also offsite. Detailed assessment needs to be based on best practice, be evidence based and adequately address all environmental aspects and impacts of the proposal.
2. The assessment needs to specifically address potential negative impacts on:
 - surface water flows and alteration to the hydrological flow regime,
 - aquifers and inter-connected groundwater dependent ecosystems,
 - terrestrial ecosystems and corridors,
 - threatened species,
 - Aboriginal cultural heritage/culturally significant landscapes and
 - Prime Agricultural Land.
3. Any such detailed assessment should also incorporate consideration of the cumulative impacts of past and future proposals on environmental values within the context of the development consent for that specific proposal. Consideration also needs to be given to the impact that climate change may have in relation to escalating mining impacts into the future.
4. The precautionary principle needs to be applied to proposals where the environmental impacts are unknown or unclear with further research and investigation instigated to assist and guide the assessment process.
5. The NRCMA supports and endorses the application of "the maintain and improve" principle to proposals and the need for the impact on CAP targets to be considered and addressed in the assessment process.
6. The NRCMA acknowledges community concern in relation to the potential impacts on agricultural and environmental land as well as the impact mining activity can have on community capacity to embark and engage in NRM
7. Proposals which are approved following the assessment process require adequate consent conditions applied to ensure that there are no adverse environmental impacts. Consent conditions need to address and offset likely impacts with the intention of improving or maintaining environmental outcomes.
8. Consent conditions need to address the development and management of adequate buffers between mining activity and adjacent environmental, Aboriginal cultural and prime agricultural assets
9. Consent conditions need to apply adequate monitoring is in place to identify any emerging threats or issues as well as outlining mitigation processes to be applied to address adverse environmental impacts identified. The monitoring program needs to cover the life of the project and beyond (planning, operation and post closure). The monitoring program needs to be open, transparent and reported to the relevant stakeholders including the broader community.

10. Consent conditions also need to address post-mine rehabilitation to ensure that there is progressive and final rehabilitation to minimize the potential for environmental degradation and return the land affected by mining to at least its former productive condition in accordance with best management practice.
11. The NRCMA recognized the issue of derelict mine's across the northern rivers and their ongoing impact on natural resources. Derelict mining across the northern rivers needs to be addressed through partnership arrangements and in consultation with the community.
12. The NRCMA recognizes the need and encourages further research into the environmental impacts of mining and new approaches to mitigating these impacts.

The NRCMA appreciates this opportunity to participate in providing feedback in relation to the coal seam gas inquiry through this submission. The NRCMA trust that the principles raised will assist in future magagement of the environmental, economic and social impacts of coal seam gas activities, including exploration and commercial extraction activities, allowable under the NSW Petroleum Act 1991.

Yours sincerely

Ian Simpson
Acting General Manager

7 September 2011