



Blue Mountains Conservation Society Inc.

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

Ref: BMCS 9-April-2013

The Director Strategic Regional Policy
Department of Planning and Infrastructure
GPO Box 39
Sydney 2001

Re: Draft amendment to the State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) (Coal Seam Gas Exclusion Zones) 2013

Dear Sir/Madam,

I write on behalf of the Blue Mountains Conservation Society, having reviewed the public consultation draft of the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) Amendment (Coal Seam Gas Exclusion Zones) 2013* and its associated documents.

The draft SEPP amendment constitutes a first step in the right direction in rationalising CSG activity in NSW. It also provides a firm government response to the demonstrated health, environmental and economic costs of CSG activities, and serves as a government admission to these costs. These aspects are to be commended.

Despite this effective admission, the amendments fall seriously short of managing these threats in any rational or coherent manner. There is no evidence presented to justify the selected exclusion zones. Rather, these variously seem to align with certain marginal electorates and high-profile or 'iconic' industries. The amendments must be revisited on the basis of an evidence-based assessment. Such an assessment would need to extend proposed exclusions to include Sydney Catchment Authority (SCA) water catchment & Special Areas, Conservation estate, groundwater dependent ecosystems, bore-dependent agricultural systems and other sensitive key resources.

The amendment restricts its charter to conventional Coal Seam Gas operations. This fails to address the comparable impacts of tight gas (presently being explored in parts of the Northern Rivers). The SEPP amendment should be extended to cover all unconventional natural gas. Furthermore, the public costs arising from other extractive industries (such as coal) are known to be equal to or greater than those of CSG. The public of NSW still awaits a comprehensive and fair planning response to the management of extractive industries that recognises the burden of such extractive industries on our natural environment, productivity and social amenity.

The amendment to permit local government to "opt out" of the proposed exclusion zone protections is concerning. This loophole undermines the entire purpose of the draft SEPP amendment – that is to exclude key assets from damage through CSG – suggesting that the amendment package is for the purpose of window-dressing rather than constituting a serious policy response. This option must be removed to ensure public confidence in the proposed amendment and the NSW planning system.

We support in principle the proposed amendment, but strongly urge that an expanded and evidence-based response be provided to address the impact of extractive industries on our landscapes.

Yours sincerely,

A handwritten signature in black ink, reading "P. Ridgeway". The signature is written in a cursive, flowing style with a long, sweeping tail on the letter "y".

Peter Ridgeway
President, Blue Mountains Conservation Society

9 April 2013