



# Blue Mountains Conservation Society Inc

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## Nature Conservation Saves for Tomorrow

Wednesday, 19 November, 2014

**Anthony Roberts,**  
**Minister for Resources and Energy**  
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**Pru Goward,**  
**Minister for Planning**  
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**Rob Stokes,**  
**Minister for the Environment & Heritage**  
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**Dear Ministers,**

### Protection of the Gardens of Stone

The Blue Mountains Conservation Society (BMCS) has a proud history of successful environmental and heritage activism. Its current membership of about 850 is predominantly located in the Greater Blue Mountains area, but some are drawn from Sydney and other NSW population centres, while a few are from inter-state. However, the reach of BMCS is substantially greater than its membership, because of its affiliation to and close working relationships with other environmental organizations including the Nature Conservation Council, Environmental Liaison Office (ELO), Colong Foundation, Lithgow Environment Group, and Protect Sydney's Water.

As you are assuredly aware, following rejection of the Coalpac Consolidation Project (CCP) by a Planning Assessment Commission Merit Review (2012) and the Department of Planning and Infrastructure (DPI) (2013), Coalpac withdrew the CCP before it was referred to a PAC for final determination. The latter action is consistent with Coalpac recognising that the PAC would have refused the CCP.

Coalpac next entered Voluntary Administration and, apparently under a Deed of Arrangement involving (amongst others) ANZ and EnergyAustralia, lodged less grandiose Modifications focused on Invincible and Cullen Valley Mines. The DPE conditionally approved these Modifications, seemingly in accordance with a suggestion contained in its negative assessment of the CCP, despite the Modifications heavily impacting the environmentally unique land system which was previously given as the reason for rejecting the CCP. The DPE noted that the Division of Resources and energy (DRE) and Treasury strongly supported the Modifications, and that the DRE saw the Modifications opening the door to subsequent extensions which would result in progressive development of the previously-refused CCP. The DPE was aware of this possibility and specifically rejected the notion of CCP development by stealth!

Despite the DPE's positive assessment of the Modifications, the independent PAC carefully assessed all issues and rejected the Modifications. This outcome has resulted in lobbying of the Premier and Ministers for the decision to be overturned. The NSW Minerals Council (NSWMC), sections of the 'Murdoch' press and 'talkback' radio jocks have accused the Government of shying away from its responsibilities by using an independent PAC to make final determinations. This would be amusing were it not for the fact that the

integrity of the carefully designed planning system is being challenged. So, despite the vast majority of coal proposals being recommended for approval by the DPE, and then subsequently being approved by the Minister, DPE senior staff by ministerial delegation, or an independent PAC, the current rejections of the Coalpac Modifications and the Drayton proposal have generated hysteria. The system which has favoured the miners is now deemed totally unacceptable. Communities will experience gross unemployment, government will lose revenue, and share prices will suffer from lack of certainty.

Nowhere in the above thinking is there recognition that the issues propounded by Coalpac and other proponents were carefully considered by the PAC and deemed to lack credibility. Nowhere is there recognition that Coalpac's mining of 9000 million tonnes of low grade coal would seriously damage a unique land system, thereby detracting from existing tourism and undermining the capacity to expand tourism for the direct and indirect economic benefits of the affected communities. Nowhere is serious thought given to declining power needs and the impact this will have on the viability of existing mines at a time when an oversupply of thermal coal has caused some miners to opt for extended Xmas-New Year shut downs, and others to enter long-term care and maintenance. Rather than prolonging the agony by pursuing a short-term unsustainable dependence on coal mining, there is much merit in transitioning the Lithgow and other communities of the Western Coalfield into an economy based on tourism and mining heritage.

Since 2004, the Society has campaigned to conserve the Gardens of Stone region of the western Blue Mountains and its escarpment terrains. As part of this, the Society is committed to reserving Ben Bullen State Forest (BBSF), Wolgan State Forest (WSF) and Newnes State Forest (NSF) as State Conservation Areas within the parks system of NSW. Such reservation is compatible with low-impact environmentally sensitive underground mining and does not compromise existing and proposed underground mining operations. This point is made because Centennial Coal has placed the Angus Place mine on care and maintenance due to the low export price of thermal coal. Indeed, Angus Place's General Manager anticipates re-opening the mine when the supply/demand imbalance changes and the coal-price increases.

The Society strongly urges you to acknowledge the unbiased views of the PAC and OEH regarding the magnificent values of the Gardens of Stone, and move towards the reservation of the BBSF, WSF and NSF. It is long overdue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Brian Marshall', with a stylized flourish at the end.

**Brian Marshall, PhD, BSc (Hons), ARCS, Grad Dip Mgt.  
For the Management Committee.**