

Local Government
Association of NSW



Shires Association of NSW

**SUBMISSION TO THE LEGISLATIVE COUNCIL INQUIRY
(GENERAL PURPOSE STANDING COMMITTEE NO. 5.) INTO
COAL SEAM GAS**

DATE

September 2011

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Introduction

The Local Government Association of NSW and Shires Association of NSW (the Associations) are the peak bodies for NSW Local Government.

Together, the Local Government Association and the Shires Association (LGSA) represent all the 152 NSW general-purpose councils, the special-purpose county councils and the regions of the NSW Aboriginal Land Council. The mission of the Associations is to be credible, professional organisations representing Local Government and facilitating the development of an effective community-based system of Local Government in NSW. In pursuit of this mission, the Associations represent the views of councils to NSW and Australian Governments, provide industrial relations and specialist services to councils and promote Local Government to the community.

The Associations are pleased to provide a submission to the Legislative Council Inquiry into Coal Seam Gas. Mining has historically been viewed by Governments and communities as a valuable source of employment and wealth generation. Mineral, coal, oil and gas assets have also been seen to be the property of the Crown, to be exploited for the benefit of all, not the surface land holder. The Associations acknowledge that this is still the case, however strong and rapid development of these assets will also present significant local and regional impacts that will require allocation of resources, communication, consultation and the imposition of policy and regulatory measures to manage the negative impacts effectively.

The perceived rapid pace at which coal seam gas development is taking place is a factor contributing to communities' anxiety and resistance to this sector of the mining industry. Even industry commentators have reported on bad management by several of the companies involved that is feeding community fears and threatening the industry. The Associations would like to see leadership from the State government to moderate the perception of urgency and rapid expansion of the coal seam gas industry. It is time to take control of decision making and ensure that proper processes are put in place to require a robust assessment of all the impacts (social, environmental, economic) of coal seam gas extraction. Decision makers, as well as affected communities, councils and other stakeholders, need time to understand, assess, plan and prepare for the potential growth of this relatively new industry.

Mining is site-specific, and each surrounding community has its own particular set of complexities and attributes. The Associations therefore hold the view that while a broad-brush approach may provide uniformity and address some of the issues, mining will have different impacts on each Local Government Area. It is therefore essential to recognise and understand the distinction between these mining regions and assess and plan within each region on its merits.

Communities have developed a greater recognition of the issues that have the potential to affect them, as a result of increased public knowledge, awareness and concern about environmental, food security, health and climate change risks. This has led to the need for higher levels of social and community interaction at the development and planning stages of both exploration and mining assessments. Local Government would like to see processes put in place at the outset to ensure that mining and exploration companies undertake a complete assessment of their proposals prior to commencing their activities, to identify not only the impacts on towns but also the impacts on individuals, their lifestyles and their futures.

The Associations see the following issues as contributing to the controversy about mining presently witnessed across NSW:

- A perception of a lack of communication between Government, industry and the community.
- A sense of powerlessness among communities, councils and land owners over the decisions that are being made that affect them.
- Lack of strategic assessment of cumulative impacts of multiple developments (both mining and non-mining related), particularly the social, cultural and community impacts.
- Lack of coordinated strategic planning and identification of land for future activities (e.g. mining versus

agriculture).

To address these concerns the Associations submit that the following initiatives are needed:

- Development of regional plans to provide a strategic framework within which assessments of individual resource development proposals can be made. The Associations support the Government's proposal to develop *effective* and *meaningful* Strategic Regional Land Use Plans as a tool for such strategic/regional planning/decision making.
- A new approach to approval processes for exploration licences and coal seam gas approvals which allows for community consultation.
- Thorough assessment of social, economic and environmental impacts and more effective management requirements for mining approvals.

The Associations' submission focuses on the key issues for Local Government and their communities that are critical to the future of planning and preparing for balanced economic development in their regions.

In regions that are currently the focus of potential coal seam gas development such as the Gunnedah Basin, it is not too late to ensure that this development occurs more strategically, to ensure that any negative impacts are mitigated and its communities can take maximum advantage of the opportunities presented.

Local Government stands ready and prepared to work with the NSW Government and coal and gas companies to address the significant issues raised in this submission, especially in the areas of cumulative impacts, housing supply, labour market, infrastructure/transport impacts and seeing a share of mining royalties returned to the region.

1. Cumulative Impacts

Many communities in NSW have more than one exploration or mining project occurring at the same time. However, with each proposal being received, processed and considered in relative isolation of the others, it is the concern of Local Government that the collective impact of a number of such proposals is not assessed, and often only the Local Government Area where the proposal is located is given the opportunity to participate in the process, whereas the cumulative impacts of individual applications often extend to neighbouring Local Government Areas.

The cumulative issues are particularly poignant in relation to social impacts. Individually, one coal seam gas or coal mining development might bring economic benefits to a region or Local Government Area, with the impact on infrastructure and services able to be accommodated by the local community along with the assistance of contributions from the mine proponent. However, *cumulatively*, resource developments have a direct impact on the liveability (specifically noise, dust and visual amenity) and social elements of a locality. Nevertheless, no extensive or quantifiable assessment of this impact is generally undertaken in the decision making process for such proposals.

The cumulative effect of multiple, unrelated projects can result in some social and community disruption because of a lack of accommodation, increased road transport, social impacts because of large migration of outside work forces and enhanced community uncertainty of activities. The Associations consider that exploration and mining companies should be required to review community and regional activities in their *entirety* and to identify cumulative impacts. This would allow unrelated projects that may increase the need for accommodation or resources in an area to be considered (e.g. a coal seam gas project, a mine extension and exploration activities occurring at the same time). A community impact statement has been proposed by Gloucester Shire Council¹ as a possible tool that that could be used by mining companies in identifying cumulative impacts.

¹ *Consideration of Exploration and Mining Applications – A New Approach, Submission to NSW Draft Coal and Gas Strategy*, Gloucester Shire Council April 2011

In summary, in relation to cumulative impacts, the Associations recommend that:

- The assessment of each application for coal seam gas development includes consideration of the cumulative impacts, which could be assessed using a tool such as a community impact statement.
- The process for assessing and consulting on each application for coal seam gas development formally includes neighbouring Local Government Areas for consideration of individual cumulative impacts within the sub-region.

2. Land Use Conflicts and Impact on Agriculture

Successive NSW governments have not identified the areas of the state that should be protected from mining activity, nor have they identified the value of agricultural land and the production capacity of the land for food production, stocking or industrial cropping. Local Government backs other stakeholders in calling for recognition of the importance of food security and the protection of productive agricultural land and water resources. The need to value the long term returns of agriculture and water as opposed to the relatively short term one-off returns from mining, must be factored in to decisions about how and where such mining should take place. A process or policy needs to be developed by the Department of Planning and Infrastructure, in association with other stakeholders and relevant government agencies, to manage conflicting land uses arising from mining, coal seam gas extraction and associated developments. The Environmental Defenders Office (EDO) NSW has recognised the need to document other values besides mining opportunities, and has suggested that the development of a detailed policy may assist in ensuring that appropriate land use options are developed and that areas of high agricultural, environmental or cultural value are recognised². The EDO reports that Queensland has embarked on developing a land use conflict policy to identify high value areas, such as those of high agricultural value (strategic cropping land), which have the potential to preclude mining operations from operating in an area.

It is essential that provision is made to address the land use conflict, macroeconomic and other cumulative issues prior to incremental assessment of coal seam gas proposals. This issue is further evidence of the need for upfront strategic planning in regional plans, prior to decisions being made about individual proposals.

The reservation of high quality agricultural land must be a major priority of any long term strategy to manage the expansion of coal mining and gas extraction industries. A process needs to be established – most appropriately this would be part of the strategic regional land use planning process – to explore mechanisms to identify areas of high agricultural potential and value and establish criteria that ensure productive agricultural land is not compromised by mining or gas development.

Local Government supports the NSW Government's recently announced requirement that all new coal and coal seam gas extraction applications be accompanied by an Agricultural Impact Statement. The Government will need to design a robust framework for these Agricultural Impact Statements, that can be readily implemented, independently assessed and is supported by the agricultural community. When preparing these statements, proponents should be required to identify the current land use activities and their benefit to the local and regional community, review the potential land use impacts of the exploration phase and identify the long term impacts at a local level from the removal or disturbance of land if mining is to occur in an area. Local Government would consider that the 'disturbance' factors should also take into account the relocation of farm operators due to land acquisition, and the reduced production capacity due to the shrinkage of agricultural land areas.

The Associations are also pleased to see the Government's commitment to implement an Aquifer Interference Regulation, and its announcement of the ban on the use of toxic chemicals in coal seam gas extraction in NSW and a moratorium on the controversial hydraulic fracturing process which has been put in place until December 2011.

² Environmental Defenders Office NSW, *Submission on the NSW Coal and Gas Strategy*, April 2011

3. Infrastructure and Labour Market Issues

Transport Impacts

The issue of impacts on regional transport networks including local roads and the need to analyse movement, whether that be commercial haulage of freight or movements of employees to mine/resource developments and associated industries, requires detailed region-wide studies.

The implications for small rural towns and regional centres from increased rail and road traffic are considerable. Councils conduct their own traffic studies to establish the impact of such changes on the local road network. It is essential that there is analysis and monitoring of the impacts of increases in rail and road traffic and that appropriate contributions to mitigate these impacts are applied to new coal seam gas developments or the expansion of existing resource developments within a framework that looks at the cumulative impacts rather than incremental impacts of individual proposals.

Housing

With potentially multiple coal seam gas proposals, combined with other major mining developments in some rural Local Government Areas, there will be a need for additional housing. Councils in mining areas already report that the growth in demand is also adversely impacting housing affordability (rental and ownership) for those outside the mining industry competing in the same market for accommodation as mining industry employees.

Local Government is also cautious about proposals for 'mining work villages' as an accommodation option. Concerns have been expressed by some councils that such developments can have social impacts, provide little economic return and formalise a clear divide between resource development employees and the balance of the community. The development of any housing solutions should integrate effectively with the existing urban fabric and while being cost effective, they should also demonstrate permanency and be in keeping with the adjoining neighbourhood and urban landscape. Local Government would like to see commitments established with resource development companies in association with councils prior to lodgement of environmental assessments, as to how accommodation needs of the development will be met.

Labour Market

Councils have reported anecdotal evidence that in some mining regions, limited labour supply and high demand for labour has increased the price of labour which in turn appears to have flowed into prices more generally. The variation between mining and non-mining labour forces is exacerbated due to the significant differences in remuneration, with mining operations often securing employees from the non-mining sector due to their higher wages. This has significantly impacted on non-mining businesses and councils being able to retain or source appropriate labour and skills, as they are in competition with the mines for these limited labour resources. The flow-on effects for the local economy include the depletion of qualified trades people being available for the domestic/non-mining sector.

In many instances the labour market analysis in the preparation of environmental assessments is limited to the immediate demands of the resource development proposal, and the analysis often has little regard for other developments which may be competing for the local labour resources. Local Government sees a broader analysis of the implications of resource development on existing local businesses as essential. A significantly higher level of analysis of socio-economic issues within environmental assessments is required to deal with the future cumulative impacts or resource development in regional localities.

4. Environmental Issues

Due to the infancy of the coal seam gas industry in NSW, there is uncertainty surrounding the specific short and long term impacts that may arise from mining the resource in both regional and urban centres. The key environmental concerns of communities include the potential water management risks and impacts, air and noise quality, biodiversity impacts and loss of agricultural land.

Local communities are particularly concerned about the potential impacts on and risks to sustainable water

management. Given the combination of uncertainty about water impacts, the significance of potential impacts, and the long term period over which they may emerge and continue to have effect, the Associations believe that coal seam gas development represents an as yet unquantified risk to sustainable water management. The Associations therefore call for thorough, transparent and integrated consideration of water-related impacts in all approval processes.

The consequences of not managing the water are substantial, therefore Local Government recommends an adaptive and precautionary management approach to allow for progressive improvement in the understanding of impacts, including cumulative effects, and to support timely implementation of mitigation and management arrangements. Local Government also supports calls from other organisations, in particular the Association of Mine Related Councils, for baseline data on water resources to be developed.

A collaborative and coordinated approach to working with resource development companies to reduce cumulative impacts of dust, noise and blasting is essential.

In relation to biodiversity impacts, where possible, offsets should remain in the region affected, so the community receives the benefit directly. In addition, a more strategic approach (e.g. a whole of catchment basis) needs to be established. It is important to ensure not only that quality agricultural land is not consumed for biodiversity offsets, and also to provide a more coordinated approach to this matter by resource development companies. Similarly, the Associations support the utilisation of strategic environmental assessment that is now occurring in the Hunter region with the air quality monitoring network.

Substantial areas of agricultural land can directly and indirectly be affected by mining. Once mined, this land will not sustain the same levels of agricultural productivity. Experience has also shown that mining operations purchase large areas of agricultural land to act as buffers. This land is consequently alienated from productive agricultural use and is often poorly managed resulting in weeds infestation and general degradation. There is a need to ensure that acceptable land management regimes are put in place.

5. Mining Royalties

Mining royalties are a major revenue source for the NSW Government, raising an estimated \$1 billion in 2009/10, with forecasts that they will rise to \$1.6 billion in future years. This is largely the result of the boom in coal exports. Gold and other mineral exports have also been growing. Mining royalties are currently paid into state consolidated revenue.

It is acknowledged that the NSW Association of Mine Related Councils (AMRC) has been developing and promoting a regional grants scheme currently known as “Royalties for Regions”. The proposal is to return a share of mining royalties to regional communities. The LGSA are generally supportive of the proposal. At this stage the AMRC are advocating the return of 30% of mining royalties to regional communities. This would amount to \$300 million per annum at present but would escalate to up to \$500 million based on royalty forecasts.

The proposal was originally based on the Western Australian “Royalties for Regions Program”. This program shares a percentage of royalties with Local Government in regional areas generally (whether they are directly affected by mining or not), while providing additional funding to those communities that are directly affected. It also funds regional services and key regional infrastructure through Western Australia’s Regional Development Commissions.

Local Government needs additional sources of revenue if it is to address infrastructure funding shortfalls and to remain financially viable. A permanent share of mining royalties would provide one such source. It is fair that the NSW Government’s revenue windfall generated by the mining boom be shared with Local Government generally and with additional recognition of those communities impacted by mining.

LGSA note that the NSW Government has established the Resources for the Regions program to provide up to \$160 million over the first term of government for infrastructure projects in mining affected communities.

However, this equates to only \$40 million per annum and is only available to councils directly affected by mining activities.

The Associations advocate the establishment of a “Royalties for Regions” scheme (incorporating the Resources for the Regions program) with two funding pools, the first for Local Government generally, to help address the identified infrastructure renewal backlogs and the second to help address the major impacts that mining has on the communities surrounding the mine sites (e.g. damage to roads and the environment, and increased demands for infrastructure and services).

6. Social and Community Infrastructure

The Associations are concerned at the absence of socio-economic analysis of mining and coal seam gas activities at a local, regional, state-wide and catchment-wide level. Local communities where mining is set to expand and coal seam gas extraction is proposed will potentially experience a significant population influx over the next 3 to 5 years, either as new full time residents, or those who ‘fly in-fly out’. In addition to the previously mentioned housing and ‘liveability’ impacts, this will place significantly greater strain on a variety of community support services (e.g. health, community support, education, law and order). In some smaller townships, this might only compound existing efforts to cope with community demand for these services.

It is critical that demand and improvement to service levels is addressed in the socio-economic analysis of proposals. This would lead to a requirement for financial commitments from resource development industries and the State Government to support any necessary upgrades to social/community infrastructure to meet the increasing demands generated as a consequence of the industry. Councils such as Gunnedah Shire have expressed the view that there should be compulsory community contribution programs established by companies which receive project approval from the government. These programs would be administered at arms-length from the company, by the community and provide financial support for community programs and events for the full life of the approved project.³

To determine the community and individual impacts, the Associations propose that consideration be given to requiring mining companies to prepare social impact studies prior to exploration, and as part of an environmental assessment for all new mining projects. This issue has been given significant consideration by some councils, most notably, Gloucester Shire Council⁴.

The detailed social impact assessment could lead to preparation of a social impact management plan, developed by the proponent for the life of the project, to promote a dynamic role for communities, local authorities and all levels of government through the construction, operation and decommissioning stages. The AMRC has recommended that consideration be given to implementing social impact management plans, similar to a scheme introduced in Queensland as part of mine development lifestyle approval processes.⁵

The Associations encourage the Government, communities and industry to consider the merits of this proposed approach to lead to a more rigorous assessment and management strategies for the social impact of mining and exploration.

7. Strategic/Regional Planning

The issue of cumulative impact assessment discussed previously is evidence of the need for upfront strategic planning. The Associations believe there is a need to establish a specific process for strategic state wide land-use planning for mining projects in NSW to identify competing land-uses, future coal seam gas potential, and create certainty for Local Government, communities and mining proponents and to enable better account to be taken of the cumulative impacts. The introduction of strategic regional planning for coal seam gas and

³ “Council to air CSG concerns at inquiry”, Media Release, Gunnedah Shire Council, 25 August 2011

⁴ *Consideration of Exploration and Mining Applications – A New Approach, Submission to NSW Draft Coal and Gas Strategy*, Gloucester Shire Council April 2011

⁵ *Submission to NSW Coal and Gas Strategy Scoping Paper*, Association of Mining Related Councils, April 2011

other mining operations in NSW would assist both in better addressing land use conflicts, and also to adequately address cumulative impacts. As previously stated, Local Government is arguing for a move from the ad-hoc process of assessing mining projects on an individual basis, to one where proposals are considered in the context of environmental impacts of both existing and likely future projects in the area.

The Associations support the Government's intention that triple bottom line assessments be undertaken for the key regions which are currently the focus of growth in coal mining and coal seam gas extraction (Hunter Valley, Western coal resource areas, Gunnedah Basin, Illawarra). The data collected from this assessment should be used to develop evidence based strategic regional plans for mining operations in NSW. This triple bottom line assessment should also lead to the identification of areas where mining operations should be prohibited due to their environmental/agricultural/cultural values. The Associations therefore support the case for developing a strategic regional planning approach that identifies mining exclusion zones where appropriate.

Local Government considers the NSW Government's *Strategic Regional Land Use Policy* as a positive step toward achieving a balance between the State's major land uses. The Policy outlines a commitment to state-wide strategic planning, through the development of Strategic Regional Land Use Plans which aim to provide a framework for future development right across NSW – not just those regions currently under the most development pressure.

The transitional arrangements announced as part of the Government's *Strategic Regional Land Use Policy* include a period of tougher assessment new coal and coal seam gas exploration licences and approvals in NSW. This decision by the Government recognises the need to pause, take stock and assess the current levels of mining and coal seam gas activity, and the ways in which these activities are – or are not – regulated and enforced across the state.

The transitional arrangements also include a requirement for all applications for coal and coal seam gas exploration licences to be exhibited for public comment. This acknowledges the importance of community engagement in the process, to allow landholders and communities more broadly to learn about an exploration licence before it is granted and an exploration company is actively seeking property access. Local Government looks forward to receiving more information from the Government as to exactly how this process will operate in practice. In the case of coal seam gas exploration applications, extensive tracts of land are involved, affecting potentially tens of thousands of community members.

In summary, Local Government would like to see a moratorium on coal seam gas extraction and exploration while a strategic plan for coal seam gas extraction in NSW is developed with full community and independent scientific input.

8. Approval Processes – Coal Seam Gas Exploration and Developments

A major catalyst for community concerns about coal seam gas has been the granting of exploration licences without proper consideration of the environment, heritage and social aspects.

The work of some councils in regions that are affected by the potential expansion of coal seam gas developments has identified that there are alternative ways to view mining and exploration projects and to ensure that from the outset, community and individual consultation is paramount to long term mining decisions.⁶

The Associations consider that environmental assessments for coal seam gas extraction should be undertaken upfront at the beginning of any exploration stage, thereby revealing many of the concerns before they become major issues for the Government, mining company and community.

For the coal seam gas industry to proceed more sustainably there is a need to review the processes as currently set out in legislation for assessing the impacts that accompany mining applications. This should

⁶ *Consideration of Exploration and Mining Applications – A New Approach, Submission to NSW Draft Coal and Gas Strategy, Gloucester Shire Council April 2011*

include prescribing a clear process for assessing potential cumulative impacts, identifying appropriate land use management options for local areas based on a range of criteria, and implementing triple bottom line decision-making so that the relevant strategic regional plan takes into account social and environmental impacts as well as economic considerations.

9. Improved Communication/consultation

The Associations consider that meaningful public consultation and participation in relation to coal seam gas is a critical foundation for generating positive collaboration and mutual benefits for communities, governments and developers. Better communication and consultation will be essential to negotiate a path through the multitude of differing knowledge, views and expectations amongst stakeholders of the coal seam gas extraction industry. There may be a need to review existing legislation to provide for and formalise more effective communication between Government, industry and the community throughout the mining decision making process.

The Associations would like to see communication enhanced in the following areas, as a starting point:

- Formal consultation with councils by the relevant State government agencies assessing coal seam gas project applications, to discuss the proposals before determinations are made.
- Improvements in consultation between industry and the community. For example, councils report that many people feel they are at a significant disadvantage and feel pressured when dealing with large and well-resourced companies. Gunnedah Council has suggested that a standard compensation arrangement (or template agreement) for landholders on whose property exploration and/or project infrastructure is proposed could provide a basis for negotiations between industry and landholders.⁷
- There is a need for clear guidelines to be developed for companies to set up and run community consultative committees to enable truly effective representation from across the community in which they operate. Community consultative committees (both during exploration and after development approval has been granted) are dependent on the diversity of the local community they represent and the personalities of the group.

10. Baseline Data, Benchmarking and Monitoring

The Associations support other agencies (such as NSW Farmers Association⁸) in calling for benchmarking of water quality, air quality, health and other parameters before mining and/or coal seam gas exploration activities take place. A standard set of parameters needs to be developed for benchmarking and ongoing monitoring, to enable regional and catchment wide analysis of health, environmental and community indicators before, during and after mining and coal seam gas development. This data collection is a crucial part of undertaking a comprehensive triple bottom line assessment, as proposed by Government, to ensure that all potential environmental and social impacts are also identified.

11. Conclusion

One of the main issues for Local Government that has been raised in this document in relation to coal seam gas exploration and development relates to a greater need to determine the cumulative social and economic impacts of resource developments at a local level. There is a need to undertake community impact and social impact assessment prior to the exploration approval being issued and a need for a higher level of community and landholder engagement.

A strategic analysis of mineral resources and potential land use conflicts and competing interests should be a priority to decide future development. While there are some common themes regarding the impact of mining across the State, the actual manifestation of those impacts differs from place to place. The Associations

⁷ "Council to air CSG concerns at inquiry", Media Release, Gunnedah Shire Council, 25 August 2011

⁸ *Submission to the Senate Standing Committees on Rural Affairs and Transport - The Management of the Murray darling Basin – impact of coal seam gas*, NSW Farmers' Association, July 2011

therefore maintain the view that a blanket approach is not the solution to finding an acceptable balance, and each regional area needs a regionally focused strategic plan that will identify and include benefits for the community as well as measures to plan for, manage and mitigate the negative impacts.

The Associations recognise the economic benefits and efforts towards responsible environmental management of current coal mining operations. However, despite these economic benefits, Local Government is of the view that any commitments to coal seam gas operations should not be supported until a proper process to assess all impacts has been carried out, adequate provisions /resources have been made to meet stringent environmental and social expectations, and extensive community consultation has taken place. The Associations also consider that such proposals must be carefully considered and weighed up against their potential to compromise the aesthetics of the locality and the lifestyle of its communities.

Throughout this submission, the Associations have advocated the introduction of a pause on new mining exploration and production licences as a transition to the Government's proposed new strategic regional land use planning approach. The Associations interpret the NSW *Government's Strategic Regional Land Use Policy*, with its set of transitional principles, as favouring such a transitional phase.

It has been well-documented that the potential impacts of coal seam gas developments, particularly the cumulative effects of multiple projects, are not well understood. The Associations therefore recommend that industry and governments adopt a precautionary approach, with a moratorium placed on new mining exploration and production licences until and unless the environmental risks particularly to the water resource, as well as social and economic impacts have been assessed, and we can ensure that these cumulative impacts can be carefully and effectively managed.

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