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Our reference: 261-14SS
Your reference: T08-0163/0164/0165/0166

16 December 2014

Mr. David Campbell,
Manager, Coal and Petroleum Titles, and Systems
NSW Trade and Investment
PO Box 344
HUNTER REGION MAIL CENTRE 2310

Email: webcoaltitles@trade.nsw.gov.au

Dear Mr. Campbell,

RE: Applications for Mineral Exploration Licences (MELAs 6, 7, 8 & 9) by Sydney Basin Pty Limited (previously known as Energie Future Pty Ltd) under the Commonwealth Offshore Minerals Act 1994

Thank you for your recent letter (undated), received by us on 11 November 2014, inviting comments in relation to the above applications. Similar applications were lodged by the Applicant, Energie Future Pty. Limited as it was then known, in 2008. We provided comments in relation to those applications by letter dated 27 November 2008.

We note that a number of our members, have provided comment on the above applications and we concur with and support those comments.

We do not support the granting of the licences sought for the following key reasons:

1. The absence of robust scientific information which identifies and assesses the actual and reasonably foreseeable direct environmental, socio-economic, cultural and health impacts of the proposed activities, including future cumulative impacts.

As a result, an independent assessment and consideration of the merit of the applications cannot be undertaken.

Potential impacts are considerable and may include to:

- a) marine life, for example through:
 - i) vibrations and shocks
 - ii) pollution from spills, leaks, discharges and noise
 - iii) increase in turbidity and total suspended solids
 - iv) disruption to habitat, feeding and migration patterns etc
- b) water quality
- c) beach and ocean use and amenity
- d) navigation
- e) existing economic activities such as fishing
- f) geology and the natural and built environments.

2. The absence of robust financial information which verifies the financial viability of the Applicant and its ability to meet the costs of addressing environmental impacts that may result from the proposed activities.
3. The absence of robust scientific information which identifies, quantifies and addresses likely greenhouse gas emissions from conducting the activities.
4. The absence of a robust, transparent and publically available monitoring and evaluation program.
5. The absence of community consultation.
6. The grant of licences would be inconsistent with the spirit and intent of the NSW 2021 and related policies.

We respectfully suggest that comment also be sought from the Marine Estate Management Authority established under the *Marine Estate Management Act 2014*, an Act whose objects are *to provide for the management of the marine estate of New South Wales consistent with the principles of ecologically sustainable development ... (s.6).*

The concerns of local government have been clearly articulated in response to the Applicant's former applications. However, the Applicant has not availed itself of the opportunity to address these concerns when making the current applications.

Kindly take the above into account when considering the applications.

If you wish to discuss any element of the above or require any further information or documentation, please do not hesitate to contact Stephen Summerhayes on 9246 7326 or via email at Stephen@sydneycoastalcouncils.com.au.

Yours sincerely,



Geoff Stevenson
Chairperson

