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Ms Tracey Godwin  
Minerals - Titles  
NSW Department of Primary Industries  
PO Box 344  
Hunter Region Mail Centre NSW 2310

CM052-08

27 November 2008

Dear Ms Godwin

**Re: Applications for Exploration Licences by Energie Future Pty Ltd under the Commonwealth Offshore Minerals Act 1994**

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the Applications for Exploration Licences by Energie Future Pty Ltd under the Commonwealth Offshore Minerals Act 1994. The SCCG supports the submissions of its Member Councils, including Pittwater and Manly Councils, on the applications and believes that approval of these applications should not be granted on the grounds that:

- The potential environmental impacts of the applications on the near and off shore environments of the proposed licence areas can not be fully assessed based on the information provided; and
- Approval of the applications would be inconsistent with the intent of all spheres of government to ensure the efficient and sustainable use of energy as outlined in documents including the NSW Greenhouse Strategy 2005 and Local Government Strategic Plans.

The sustainable use of the planet's natural resources by and for the benefit of current and all future generations is an important strategic goal for all SCCG Member Councils. To assist in achieving this goal a number of SCCG Member Council strategies identify specific actions that promote the efficient and sustainable use of energy and the protection and conservation of natural resources including coastal zone resources and biodiversity.

The SCCG believes the applications should only be considered after the extent of environmental impacts is understood. Approval of the four applications with limited understanding of potential environmental impacts is likely to have a significant negative impact on the environmental management practices employed in the coastal zone across local, state and national jurisdictions.

As outlined in the NSW Greenhouse Plan (2005), achieving efficient and sustainable use of energy and the conservation of natural resources requires a significant reduction in the global use of and reliance upon non-renewable energy sources such as fossil fuels.

Approval of the four applications would be inconsistent with the plan as well as the actions of councils to identify, apply and promote sustainable energy practices.

In conclusion the SCCG does not support the granting of the four mineral exploration licences sought by Energie Future Pty Ltd on the basis that:

- insufficient information has been provided by the applicant regarding the specific potential environmental impacts that may result from the exploration process or the underground coal gasification process;
- abundant coal and gas reserves are currently available onshore to meet domestic and export needs well into the foreseeable future and underground coal gasification technologies can be equally applied to these resources;
- no feasible, economically viable or practical technology currently exists to capture and store the large quantities of CO<sub>2</sub> that are produced by the extraction, production and use of coal and natural gas;
- in the interests of intergenerational equity and the sustainable use of non-renewable resources, existing onshore coal resources should be developed and utilised before offshore resources are exploited, particularly in the absence of appropriate technologies to mitigate the impacts of the greenhouse gases that will be produced; and
- much greater emphasis should be placed on efficient energy use and the development of renewable energy technologies rather than funding the continued exploitation of and reliance upon non-renewable fossil fuels for our future energy needs.

I trust that the information provided in this letter will receive appropriate attention. If you wish to clarify any matter in the submission or require further information, please contact Craig Morrison (Coastal Projects Officer) on 9246 7702 or [craig@sydneycoastalcouncils.com.au](mailto:craig@sydneycoastalcouncils.com.au)

Yours sincerely



Wendy McMurdo  
**Chairperson**