



22nd June 2012

Carl Dumbleton c/- David Kitto re: Coalpac Consolidation Project
Department of Planning
GPO Box 39
Sydney NSW 2001

Submission objecting to the Coalpac Consolidation Project

TEC has commissioned the Institute of Sustainable Futures (ISF) to conduct an independent review of the Coalpac Environmental Assessment for the Coalpac Consolidation Project.

This review focused upon:

- Application of triple bottom line and ecological sustainable development principles;
- The rationale for the consolidation project;
- The setting of physical boundaries for the assessment of the benefits and cost, specifically the accounting for GHG emissions over the full life-cycle of the coal mine;
- The setting of time frames for the assessment of the benefits and costs, especially those that have the potential to be cumulative; and
- The valuation of environmental and social costs in the economic assessment.

The conclusions of the ISF review have led TEC to oppose the Coalpac Consolidation Project.

The proposed mining footprint contains outstanding heritage values suitable for inclusion in an expanded Gardens of Stone National Park. The proposed destruction of Ben Bullen State Forest should be seen in the same context as the demolition of a public asset. It is TEC's view that the area's biodiversity, scenic and carbon storage functions outweigh the removal of those values with a mine anticipated to increase Australia's carbon emissions by over 1%.

Kind regards,

David Burgess
Natural Areas Campaigner