



Conservation
Council SA

Committee Secretary,
Senate Standing Committees on Environment and
Communications

Via email: ec.sen@aph.gov.au

RE: Oil or Gas Production in the Great Australian Bight

The Joinery
Level 1, 111 Franklin Street
Adelaide, SA, 5000
(08) 8223 5155
general@conservationsa.org.au
www.conservationsa.org.au
ABN: 22 020 026 644

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Dear Sir or Madam,

Conservation Council SA is an independent, non-profit and, strictly, non-party political organisation representing nearly 60 of South Australia's environment and conservation organisations and their 90,000 members.

Conservation Council SA has developed a comprehensive view of environment policy in *South Australia in a Changing Climate: A Blueprint for a Sustainable Future - Second Edition*¹. This document sets out, at a strategic level, policy positions in six key environmental areas. Our policy position on oil and gas exploration and production in the Great Australian Bight is set out as Recommendation CM14 on page 28 of the Blueprint document. (refer also to Attachment 1 for the full text of the recommendation and on pages 23 to 28 of the Blueprint for supporting references).

South Australia's coastline extends more than 3,800 kilometres, ranging from cliffs, rocky shores and sandy beaches in the South East and West Coast to mud flats, seagrass, and sapphire and mangrove habitats in the upper St Vincent and Spencer Gulf regions.

South Australia's waters are among the most biologically diverse in the world. They provide habitat for a variety of plants and animals, including internationally and nationally important species such as Southern Right Whales, Australian Sea Lions, dolphins and the Leafy Seadragon. Our waters support between 12,000 to 14,000 invertebrate species, 1,500 algae, 612 fish species (occurring in <50 metres depth), 16 breeding seabird species, 33 mammal species and 12 seagrass species.

In our waters, 75% of the red algae, 85% of the fish species and 95% of seagrasses are found nowhere else in the world, giving them local, national and international significance. In comparison, the Great Barrier Reef shares more than 80% of its fish, coral reefs and other marine organisms with other countries in the tropics.

Our coastal and marine environments are a valuable economic resource, supporting large commercial and recreational fisheries and an aquaculture industry, all directly worth more than \$420 million a year.

Our key concern is that oil and gas exploration (and subsequent exploitation) poses significant threats to the coastal and marine environment of the Great Australian Bight. If environmental mishaps occur, then there will be significant flow-on effects to the environment and to the communities which rely upon these and associated waters for their livelihood.

http://www.conservationsa.org.au/images/CCSA_Policy_Blueprint_2013_Final.pdf¹

In an effort to understand the impact of an oil spill from this area, Conservation Council SA has examined the report entitled *Stochastic analysis of deep sea oil spill trajectories in the Great Australian Bight* prepared by Laurent C.M. Lebreton in October 2015 and commissioned by The Wilderness Society South Australia. This report indicates that a spill of 5000 barrels per day for 87 days (a small fraction of amount in the Gulf of Mexico spill, in which BP was directly involved), would result in an area of greater than 213,000 sq. km. having a surface oil thickness above levels likely to trigger the closure of fisheries (80% probability). Significant marine parks and coastline in South Australia would be severely impacted.

In addition, a number of endangered species – including Southern Right Whales, Blue Whales, Loggerhead and Leatherback sea turtles and several sea petrel and albatross species – would also be severely impacted.

Conservation Council SA understands that in its EPBC Act Referral for the oil and gas exploration, BP outlined a 35-day process to cap wells should a loss of well control be experienced in its Great Australian Bight operations. Conservation Council SA considers that this is an overly optimistic response time and is manifestly inadequate: the Great Australian Bight is a most physically challenging area in which to conduct operations.

The Great Australian Bight is not only deep, but swell and winds make any activity in the area extremely challenging, and containment of any spill virtually impossible to contain with current technology.

Added to that is the remote nature of this area. BP's most recent marine oil disaster occurred on the doorstep of a highly populated oil industry region. Virtually all the infrastructure, supplies and staff used in the containment efforts were on hand. Sadly, this proved ineffective in mitigating the impacts of the oil on local fisheries, tourism and ecosystems. In comparison, the Great Australian Bight has a low population base, extremely limited infrastructure, and hundreds of miles of high cliff and inaccessible coastline.

In addition, we are gravely concerned about the climate change implications from the opening up of a brand new fossil fuel source. If we are to have any chance of limiting climate change well below 2 degrees - as per the recent Paris climate change summit agreement - a significant majority of the already-known fossil fuel reserves must stay safely in the ground. Yet this proposal is to begin exploration to potentially expand those reserves further. This cannot be supported.

To conclude, in response to the terms of the references in the Inquiry:

- a. the effect of a potential drilling accident will be devastating on the rich marine and coastal ecosystems of the Bight and the broader coastal environment of South Australia.
- b. up to 80% of South Australia's livelihoods based on coastal and marine resources will be placed at risk.
- c. the Lebreton report presents a compelling case for the community to be alarmed at the proposed exploration and production program, which, in an oil spill, is likely to affect an area the same size as Great Britain.
- d. the response program proposed by BP in its EPBC Referral is completely inadequate for the potential scale of impacts of a spill and the conditions in which a spill would need to be addressed.

Conservation Council SA strongly recommends that the proposed oil and gas program does not proceed. If, however, it were to do so, Conservation Council SA recommends that:

- a full complement of BP's well control and oil spill equipment and personnel be on site **throughout the duration of the program.**
- an independent audit of oil spill procedures and facilities be established **prior to the commencement of exploration.**
- a rehabilitation fund be established by BP to pay for cleanup costs and offset environmental losses.
- BP to establish a scientific research fund to fund research into understanding of the coastal and marine environment in the Great Australian Bight.

Conservation Council SA is happy to present to the Committee directly, in support of this submission.

Yours sincerely,

Craig Wilkins
Chief Executive

Attachment 1

CM14: Prevent environmental damage from the oil and gas industry

CCSA notes the ongoing interest in oil and gas exploration off the South Australian coast and is concerned about potential negative impacts to the environment and biota. Recent incidents in the Gulf of Mexico have demonstrated the damage caused and costs incurred by these operations when they fail. Industry and government preparedness to an oil spill event is critical to minimising damage and CCSA recommends that:

- research be undertaken on the marine animals likely to be affected by the exploration or extraction processes to ensure their safety, before exploration takes place
- oil spill contingency plans are independently approved and publicly accessible before oil extraction operations commence
- regular 'dry runs' of oil spill emergency management procedures and exercises are undertaken by industry and government members
- licensing of oil and gas exploration and drilling includes financial commitment to a rehabilitation fund.