



## Submission on the Environmental Protection and Biodiversity Conservation Amendment (Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Project) Bill 2012

19 April 2012

### Submission to:

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### ABOUT BSA

The Basin Sustainability Alliance was established in early 2010 to represent landholder, community groups and individuals with serious concerns about the unrestrained development of the coal seam gas industry across Queensland and the associated environmental, health and social impacts. . BSA is committed to ensuring the sustainability of water resources, agricultural land and regional communities for future generations. The industry must not come at any cost.

### INTRODUCTION

BSA supports the principles behind the EPBC amendment because of the urgent need for independent scientific investigation into the numerous serious environmental concerns held by rural and regional communities about the long term cumulative impact of the massive scale of the CSG industry (especially considering the unprecedented volumes of water and salt likely to be brought to the surface over the next 25 to 50 years).

BSA has been asking from the day of its formation that "science leads the debate". Through this legislation we hope to see independent scientific experts investigate the numerous sub surface concerns and drive the implementation of sustainable management practices that give confidence to communities that their highly valued ground water and productive farm land will be protected.

We do not want to see "experts" brought in to manage a disaster caused by poor practices as a result of a lack of understanding of potential impacts from CSG extractions.

Landholders and the businesses and communities that rely on a profitable and productive agricultural sector must have confidence that their future is secure.

### PRIMARY CONCERN THAT THE SCIENTIFIC COMMUNITY WILL ONLY ADDRESS NEW PROJECTS

Despite our support of the concept of an independent scientific committee, we were extremely concerned to learn that the intention is for this independent committee to have no jurisdiction over projects already approved and those in the EIS process. This is a critical and huge disappointment to us. For most of the Queensland regions impacted by CSG, this will mean that this amendment will have little or no effect on activities in our region. We urge the Senate committee to review the charter of this independent scientific committee and enhance its powers to review previously approved activities. It must have the authority to look at activities already underway and have the capacity to retrospectively amend Environmental Authorities, if deemed necessary, for the safeguarding of our water and land resources. Just because the horse has already bolted doesn't mean we should try and rein it back in.

## OUR KEY CONCERNS

BSA, in its Blueprint for Sustainable CSG operations, outlined our key concerns as:

1. Over-exploitation of water in the Great Artesian Basin (GAB) and impacts on the sub artesian aquifers – water depletion and contamination.
2. Land impacts – contamination, loss of productivity, loss of amenity and reduction in land value.
3. Land access and compensation – unfair rights of entry and compensation, inadequate make good arrangements for groundwater impacts and uncertainty about the extent of future CSG developments.
4. Social impacts – uncertainty, increased costs of living to sections of the community and increased demand on community resources such as roads and health services.

For more details, we invite you to review our full blueprint document at:

[www.basinsustainabilityalliance.org/cms-assets/documents/19054-662631.notatanycostbsablueprintweb.pdf](http://www.basinsustainabilityalliance.org/cms-assets/documents/19054-662631.notatanycostbsablueprintweb.pdf)

(a copy is attached along with this submission)

## WHAT ARE KEY RESEARCH GAPS?

- Generally, BSA has concerns about the current understanding around groundwater systems, long-term sustainability considerations and, therefore, the governance of the Coal Seam Gas (CSG) industry in Queensland.
- Aquifer connectivity and transmissivity of various strata formations is not known. Comprehensive modelling and scientific research is required to understand the cumulative impacts from the change in aquifer water pressure and any potential increase in inter-aquifer flows that could be a result of the vast quantities of water extracted.
- The location of major faults, load cracks, folds and fissures, which are potential pathways for gas and water to move, are not known.
- Landholders are not willing to lose their capacity to put in replacement water bores at other sites on their properties in the future.
- The “Make-good provision” applies to the water bore not the aquifer, yet it is the aquifer which is the water resource not the water bore
- Concerns about the disposal of salt. We seek scientific clarity and a sustainable management plan for the salts produced from coal seam gas.
- Cumulative impacts on groundwater aquifers must be understood on a local, regional and catchment basis to minimise the risk of over-exploitation of current water reserves. The activities of all CSG companies and other groundwater users must be assessed as a whole.
- People in our communities need access to water to live and operate their businesses in these areas. Community has no confidence in CSG company’s capacity to make good “water”. There is a need for a scientific process to be able to make good in advance of impact.
- We have major concerns about the hydraulic fracturing – monitoring and safety of the process.
- We want to ensure that any changes made to the Great Artesian Basin (GAB) Resource Operations Plan (ROP) of 2007 (which is up for review in 2012) are based on a clear scientific process ensuring that changes do not go against the long term sustainability principles of the current GAB ROP.

## **PRIORITY AREAS FOR RESEARCH**

### **1. REINJECTION / MAKE-GOOD IN ADVANCE**

Because of the time lag between extraction and impact, water may not be available to “make good”. BSA would like scientific studies to explore “make good in advance”. Landholders and other current water users do not want to wait for an aquifer to run out of water before the CSG companies “make good”. If proven safe, “make good in advance” would increase water levels in aquifers likely to be impacted, prior to the impact, guaranteeing existing users access to water. We need to be confident in assessments of long term effects into adjacent aquifers.

### **2. A CLEARER UNDERSTANDING OF THE TRANSMISSIVITY AND INCONNECTION OF AQUIFERS.**

### **3. A SURAT BASIN GROUNDWATER MANAGEMENT PLAN**

CSG water, artesian water and surface water are interrelated and must be looked at as a whole. Research work undertaken by the Queensland Water Commission (QWC) and reported in the underground water impact report (UWIR) for the Surat cumulative management area, and other research centres must to be incorporated into the proposed ‘whole of basin’ plan. An assessment process must be developed to clearly identify the priority use of the treated CSG water so that we mitigate impacts and maintain or improve groundwater reserves so to ensure local environmental, agricultural and community sustainability. Different regions will have different priorities depending on hydrology and current water demands. This assessment process must be based on the scientific understanding of groundwater systems and must involve stakeholder agreement on the prioritised sustainable use. Surat basin groundwater management plan must take note of MDB plan in that process.

*BSA Chair Ian Hayllor  
19<sup>th</sup> April 2012*

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