

Australian Marine Conservation Society Inc.
PO Box 5815, South Brisbane, QLD, 4101 ph: 07 3846 6777 fax: 07 3846 6788
email: amcs@amcs.org.au website: www.marineconservation.org.au

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Phone: +61 2 6277 3526
Fax: +61 2 6277 5818
ec.sen@aph.gov.au
Via email: ec.sen@aph.gov.au

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Dear Sir/Madam,

Submission to the inquiry into Oil or Gas Production in the Great Australian Bight

The Australian Marine Conservation Society (AMCS) is a leading Australian NGO working towards the conservation of Australia's unique and diverse marine environment.

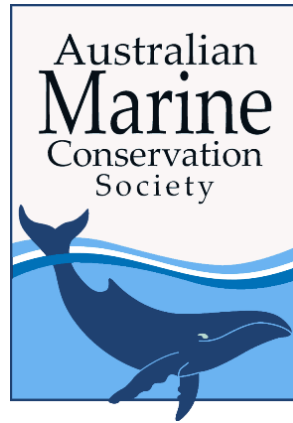
Thank you for the opportunity to make a submission to the Senate Standing Committees on Environment and Communications inquiry into Oil or Gas Production in the Great Australian Bight.

Our submission follows.

Please contact me if we can provide any further information in relation to this submission.

Yours sincerely

Josh Coates
Marine Campaigner, Australian Marine Conservation Society



Inquiry into Oil or Gas Production in the Great Australian Bight

Submission by the Australian Marine Conservation Society

April 2016

1. Introduction/overview of AMCS

The Australian Marine Conservation Society (AMCS) is a national environmental organisation working towards the conservation of Australia's coastal and marine environment and the marine biodiversity they support. Our mission is to help protect Australia's oceans for the sake of current and future generations.

AMCS is a not-for-profit charity listed on the Register of Environmental Organisations (REO).

AMCS has over 100,000 members and supporters who support our work financially, undertaking voluntary activities and through social media.

Since forming in 1965, AMCS has had a long-standing involvement in improving the protection and management of Australia's marine environment.

Throughout our 50 year history we have worked through science based research, policy advocacy, on ground activity, community engagement and education to take effective action to protect Australian's marine and coastal environment. We work with and empower individuals, volunteers and communities to also be voices for marine conservation. We work with industry, stakeholder groups and indigenous organisations to identify solutions to unsustainable use of marine resources. We seek to work with and persuade government to make long term, precautionary and ecosystems-based decisions founded on the principles of ecologically sustainable development.

2. Body of submission

The Australian Marine Conservation Society would like to unequivocally express our opposition to the drilling and exploration for oil and gas in the Great Australian Bight (GAB).

For your convenience we structure our submission to address the 4 of the 5 reference points outlined in our invitation to comment.

(a) The effect of a potential drilling accident on marine and coastal ecosystems.

The Great Australian Bight is an important and diverse marine environment of global conservation significance - wild, unpolluted and critically important to a range of special and threatened marine species. It is globally significant calving and nursery-grounds for the endangered southern right whale and an identified Biologically Important Area for blue whales, sperm whales, sea lions as well as the right whales. It provides critical habitat for a range of other species: around 36 species of cetaceans and other marine mammals including some of the last remaining colonies of endangered Australian sea lions, countless fish, birds, invertebrates and plants. The region has the highest levels of benthic biodiversity and endemism found anywhere in Australia – particularly among red algae (sea weed), ascidians (sea squirts), bryozoans (lace corals), molluscs (shellfish) and echinoderms (sea urchins and sea stars).

The values of the region have been recognised in recent years via the establishment of a number of Marine Protected Areas, which would be threatened by any oil spill or other pollution.

Offshore oil and gas drilling is inherently risky and the tragic Deepwater Horizon blowout and spill in the Gulf of Mexico demonstrates the risks of drilling in environmental, social and economic consequences when things go wrong. It also illustrates the poor environmental track record of BP – one of the main players proposing to drill in the Bight. The environmental and human cost of the BP Deepwater Horizon blowout and spill in the Gulf of Mexico were vast.

In that disaster 11 workers lost their lives. Oil poured into the sea for 87 days, releasing approximately 4.9 million barrels of oil. Marine life was devastated, local fisheries and the tourism industry were

wrecked, and local communities were left desolate. Short term impacts were major in terms of wildlife deaths, but the long term impacts are still being felt.

In the GAB the risks are compounded by the remoteness and exposure to the wild weather and huge waves of the Southern Ocean. We need not and should not expose the South of Australia to the undeniable risks of environmental disaster associated with offshore drilling.

Massive scale drilling for oil and gas is risky at the best of times and the remote and harsh conditions of the Southern Ocean make this a disaster waiting to happen. The cumulative impacts of industrialisation of the Bight for frontier oil and petroleum development, and any oil spill occurring here, could have national or even globally significant impacts for threatened and migratory species, including the southern right whale. At this time, scientists don't know enough about the deep waters of the region to properly understand the impacts an oil spill could have on the endemic ecosystems of the area. However the scientific knowledge we do have indicates the region is significant globally for a number of species and implementation of the precautionary principle should prevent any approval from being given until a fuller understanding is gained.

(b) Social and economic impacts, including effects on tourism, commercial fishing activities and other regional industries.

This region is of vital importance to many coastal communities, supporting fisheries, aquaculture and tourism industries.

In addition to the oil spill risks, proposed activities will have serious negative impact on the marine environment. The loud and disruptive underwater blasts of seismic exploration and drilling into the sea floor will impact on wildlife and cause fish mortality and impact reproductive stress potentially impacting fishing industries (see section e for more detail on seismic testing impacts). Increased shipping would increase risks associated with animal strike, pollution, biosecurity hazards and underwater noise, all of which have social and economic impacts.

The actual and potential (major oil spill) environmental damage impacting on tourism, commercial fishing activities and other regional industries will be compounded by the reputational damage to the 'clean, green' image that supports success in tourism, fisheries and other industries.

Independent expert modelling shows that if a blowout and oil spill were to occur the environmental devastation could impact as far away as West Australia or the Victorian and Tasmanian coastline depending on the scale of blowout, time of year and weather conditions. The potential impacts of a large oil spill in this region could have very large scale impacts across jurisdictions. Given the scale of the risks, it is completely inappropriate that no minister will have direct responsibility for the standards of assessment or final approval of these drilling projects (see section e for more detail on this point).

In addition to strictly economic values the impacts on traditional Indigenous cultural values and the lifestyles and wellbeing of other regional communities should be taken into account. The Bight and adjoining regions are of importance to coastal communities including Traditional Owners who retain living cultural, spiritual, social and economic connections both on land and sea.

Drilling in the Bight could significantly damage not only matters of national environmental significance and the values of protected marine parks in the Bight and elsewhere but also impact on tourism, Indigenous cultural values, commercial fishing activities and other regional industries across much of Southern Australia.

(c) Current research and scientific knowledge.

Despite a general understanding of the Great Australian Bight and universal agreement amongst the scientific and conservation community as to its significance, the area is still a largely unexplored frontier for scientific inquiry. There is much we do not know about the ecology of the region.

Senior scientists and researchers have authored a review of science knowledge of the Bight and have identified a range of key knowledge gaps in our current understanding of the region's physical processes, biodiversity and ecology. This major science review has made it clear that we cannot confidently assess the implications of potential oil spills for the region's ecosystems and reliant industries.

This review noted that "Our current knowledge of the [Great Australian Bight] is not sufficiently developed to confidently assess the implications of potential oil and gas production, including potential oil spills, for the region's diverse marine ecosystems or for its economically important existing marine industries¹".

In light of this the precautionary principle should be applied and further exploration and drilling brought to a halt.

(d) The capacity, or lack thereof, of government or private interests to mitigate the effect of an oil spill.

As noted previously, independent expert modelling shows that if a blowout and oil spill were to occur the environmental devastation could impact as far away as West Australia or the Victorian and Tasmanian coastline, depending on the time of year and weather conditions.

BP has not made its oil spill modelling (including assumptions) or Emergency Response Plans available to key stakeholders or the public, nor explained how the community would be compensated in the event of a disaster.

In the event of a well blowout, BP would have to bring critical response infrastructure from Singapore and/or Houston, Texas and if a relief well was needed this could take 157 days (information obtained by the Wilderness Society through Freedom of Information). We note in the case of the Deepwater Horizon well it took several attempts and nearly three months to cap and that, despite the well's name, it was located in waters as much as 1,500m shallower than the deepest locations in the proposed GAB site.

We do not believe government or private interests have the capacity to swiftly or adequately mitigate the effect of an oil spill. Deployment of traditional oil containment and recovery methods would be hampered and in many cases made impossible by the remote and harsh conditions. The use of dispersants is in our opinion not an acceptable alternative as this involves introduction of more chemicals with negative or unknown effects and essentially just moves the problem from the surface to 'out of sight' under the surface. We would also suggest that there is no possible way that Government or Industry would be able to assemble the personnel and resources needed to address oil spill impacts on the shoreline over such a vast and remote area. We contend that this is a case in which averting risk via not proceeding with this activity is the only satisfactory way to address the inherent risk of oil spill.

(e) Any other related matters.

We are also opposed to this development on the grounds of the climate change impacts associated with the extraction of the large quantity of fossil fuels proposed. The scientific consensus is that we must be reducing the burning of fossil fuels and instead focussing on renewable energy sources – this source of greenhouse gas emissions should remain under the ground and under the deep ocean where it belongs. It

¹ Rogers, P, et. al 2013, 'Physical processes, biodiversity and ecology of the Great Australian Bight region: A Literature Review', GAB Ecosystem Study, CSIRO, SARDI, Marine Innovations SA, and the Government of South Australia, June 2013.

is important that this inquiry consider the climate change impacts of extracting this massive and previously untouched source of greenhouse gas emissions. Opening up the Bight for oil development goes completely against Australia's - and the world's - commitment to the Paris Agreement and the aim of limiting global warming to 1.5 degrees Celsius above pre-industrial levels.

As if the risk of major oil spills associated with exploratory or production drilling is not enough there are the very real impacts of seismic testing to consider. The noise pollution associated with seismic testing has been implicated in cetacean strandings, permanent deafening of mammals leading to death, fish behavioural impacts and reductions in egg and larvae viability (reducing reproductive success) and permanent deafening of a range of species.

A recent scientific review of the as yet limited but growing scientific research into the impacts of seismic testing concluded that "At least 37 marine species have been shown to be affected by seismic airgun noise. These impacts range from behavioural changes such as decreased foraging, avoidance of the noise, and changes in vocalizations through displacement from important habitat, stress, decreased egg viability and growth, and decreased catch rates, to hearing impairment, massive injuries, and even death by drowning or strandings. Seismic airgun noise must be considered a serious marine environmental pollutant."ⁱ

Other serious impacts from the proposal include operational underwater noise, increased shipping risking animal strike, smothering from seabed disturbance and drill cuttings disposal, chemical pollution, discharge of drilling fluids and biosecurity hazards all of which should be considered by the inquiry by accessing independent expert scientific and other advice.

AMCS is concerned about the lack of ministerial accountability regarding threatened species impacts and other impacts and the lack of full public access and consultation in the approvals process. NOPSEMA has been the sole assessor and approver of offshore oil and gas activities since March 2014, There is no longer any ministerial accountability for such decisions and public access and transparency has been lost in the system. The NOPSEMA system abdicates consultation process to proponent oil and gas companies and has no direct mechanism for public consultation. The system also fails in transparency in that little or no information is provided by NOPSEMA about the decisions it makes i.e. approvals are given or rejected without any reasoning/justification provided to the public. Similarly little information is provided publically prior to decisions being made to facilitate public interest input.

Given the vast areas impacted by offshore oil and gas activities and the sensitive ecosystems and vulnerable and iconic species affected, political and ministerial accountability and full public access and consultation should be restored to the approvals process.

Conclusion

The proposed drilling in the Bight is just too risky and does not fit with a sustainable future for our Southern Ocean and coast, our country or our climate.

We request that the Committee recommend an immediate halt to all oil drilling plans in the Great Australian Bight to protect this incredible region from all oil and gas activities and spare our climate from opening up a new fossil fuel basin.

ⁱ Weilgart, L. (2013). "A review of the impacts of seismic airgun surveys on marine life." Submitted to the CBD Expert Workshop on Underwater Noise and its Impacts on Marine and Coastal Biodiversity, 25-27 February 2014, London, UK. Available at: <http://www.cbd.int/doc/?meeting=MCBEM-2014-01>