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Submission to the Senate Inquiry on the 'Environment Protection and Biodiversity Conservation Amendment Bill 2013 [Provisions]'

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Please note the following:

I **do not** want this submission to be treated as **confidential** and/or **anonymous**.

This submission does not contain personal information of third party individuals.

Introduction

The Nature Conservation Society of South Australia (NCSSA) is a community based, not for profit organisation with a diverse membership drawn from all parts of the State. The Society's primary objective is to "foster the conservation of the State's wildlife and natural habitats through effective scientific research and education".

Since its' inception in 1962, the NCSSA has taken an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities.

The NCSSA welcomes the opportunity to provide a submission to the Senate Inquiry on 'Environment Protection and Biodiversity Conservation Amendment Bill 2013' and our unequivocal support for the establishment of a new matter of national environmental significance in relation to the potential significant impacts of coal seam gas (CSG) development and large coal mining (LCM) development on a water resource. We believe that the proposed amendment will enable more robust and transparent environmental impact assessment processes for future developments and transitional provisions for existing projects with regard to our water resources and groundwater dependent ecosystems.

The NCSSA offers the following comments for consideration by the Senate Standing Committee:

The NCSSA strongly supports the views of the National Water Commission Position Statement that the potential impacts of CSG developments, particularly the cumulative effects of multiple projects, are not well understood. The Society also supports their views that an adaptive and precautionary management approach is essential to allow for progressive improvement in the understanding of impacts. We emphasise the critical importance of effective and adequate monitoring of surface and groundwater systems (including baseline assessments) to provide a benchmark for assessing cumulative impacts on other water users and water-dependent ecosystems. Such data is fundamental for guiding and informing future decisions and policy in relation to CSG and LCM developments.

The NCSSA commends the Australian Government for the establishment of the Independent Expert Scientific Committee (IESC) on CSG and LCM Development to fund scientific research on the potential water-related impacts of these activities. The Society believes that the Committee fulfils an crucial role in providing independent advice on both existing and future developments and identifying priorities for research to address critical gaps in scientific understanding of the water-related impacts associated with CSG and LCM activities. The NCSSA would therefore recommend that the Senate Committee grant the IESC a realistic timeframe to undertake the necessary research before any further developments are approved.

The NCSSA strongly supports the objectives of the National Partnership Agreement between the Australian Government and the Queensland, New South Wales, South Australian and Victorian governments to strengthen the regulation of CSG and LCM development by ensuring that future decisions are informed by substantially improved science and independent expert advice. We believe this agreement is fundamental to ensuring that future developments are undertaken in accordance with ESD principles as defined in Section 3A of the EPBC Act.

The NCSSA strongly supports the proposal for bioregional assessments to be undertaken in areas where CSG and/or LCM developments are underway or planned to provide fundamental scientific data on the ecology, hydrology and geology of an area and assess the potential risks to water resources as a result of intended developments. As the driest state in the driest continent on earth, protection of South Australia's critical groundwater resources is essential, particularly in terms of the Great Artesian basin (GAB) and Dilwyn Basin, the latter that provide approximately one third of the state's potable water.

A major project funded by the National Water Commission into the management of water in the GAB (Project Title: Allocating water and maintaining springs in the Great Artesian Basin) has shown this resource is in decline due to much greater discharge than recharge and that the rate of recharge is actually 10 times lower than the current management models predict. It is essential that any planning for water intensive industries such as CSG and LCM developments is informed by the latest scientific advice on sustainable extraction limits.