As a concerned Australian and global citizen who has been aware of the progress of the unconventional gas industry in Australia for a couple of years now and as a student of Sustainable Development with great concern for Australia's long term economic, social and environmental longevity and well-being, I urge you to make the following amendments to the Senate Inquiry into the Federal Government's Environment Protection and Biodiversity Conservation Amendment Bill 2013.

1.
Amending the Bill to cover all unconventional gas mining, including shale gas and tight gas, and unconventional coal mining. The Bill only covers coal seam gas mining, and will not cover other forms of unconventional gas mining such as shale gas and tight gas, which both utilise fracking and involve serious risks to water resources. Shale/tight gas exploration permits and applications currently cover almost 99% of the Northern Territory, and large areas of South Australia and Western Australia, including the Kimberleys and the Ningaloo hinterland. It is estimated that there are 300 trillion cubic feet of shale gas in Western Australia alone. It creates a very piecemeal regulatory system to regulate one form of unconventional gas mining and not another. There are also new coal mining techniques that represent a serious threat to water resources, that will not necessarily be captured by the scope of the Bill. The definitions need to be amended to ensure that all unconventional coal mining methods, including the extremely risky process of underground coal gasification, are covered by the Bill.

2.
Strengthen the role of the Independent Expert Scientific Committee (IESC)
The Committee still has only a weak, advisory role under the new scheme. The IESC should be required to advise on whether a project should be approved, and that advice should be binding on the Minister. Failing that, the IESC should be given a decision making role. IESC advice should be required to be made public prior to a final decision being made on a project.

3.
Define significant impacts on water resources and/or introduce a set of requirements under Part 9 of the EPBC Act for the Minister to consider when making his decision in relation to water resources The National Partnership Agreements signed between state and Federal governments in relation to coal and coal seam gas mining, provide a comprehensive definition of a significant impact on water resources. However, the Bill does not seek to include that

definition in the EPBC Act. Furthermore, under Part 9 of the EPBC Act, requirements are provided for the Minister to consider when making his decision about an activity for each of the existing controlling provisions. However, the Bill does not seek to introduce any requirements under Part 9 in relation to water resources. The robustness of the amendments, and the ability of the courts to protect water resources in the future, will depend on the provision of a strong definition or requirements under Part 9 for water resources.

4.
Include a requirement for bioregional assessments which assess cumulative impacts. There should be a requirement for bioregional assessments to be conducted prior to the Minister approving a coal or gas development. These assessments should address the cumulative impacts of all current and proposed mines, and other developments, on water resources, as well as other ecological values.

5.
Remove the circularity from definitions of large coal and coal seam gas projects. The definitions of large coal and coal seam gas projects as currently contained in the EPBC Act 1999, relate to a project that 'has, or is likely to have, a significant impact on water resources'. However, the Act sets up a whole assessment process to determine whether such mining developments are likely to have a significant impact on water resources. There is considerable circularity involved, which if removed, may improve the legal clarity of the instrument.

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