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

By email to: ec.sen@aph.gov.au

20 October 2016

Dear Sir or Madam,

RE: Inquiry into the potential environmental, social and economic impacts of BP's planned exploratory oil drilling project, and any future oil or gas production in the Great Australian Bight

Humane Society International (HSI) is pleased to make this submission on behalf of our 65,000 Australian supporters. HSI has been a long-term stakeholder in protecting Australia's marine ecosystems and the threatened and migratory species that depend on them. HSI has also been a strong advocate for improving Australia's environmental governance structures and laws to ensure robust and transparent environmental decision-making, community participation and access to information.

HSI has a number of concerns in regard to the likely environmental impacts that will occur as a result of any exploratory oil drilling projects in the Great Australian Bight, especially in regard to species' critical habitats, such as for whales, sea lions, and other marine species.

HSI has previously raised strong concerns in regard to the decision to accredit the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) to be able to undertake environmental assessments under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). We maintain that NOPSEMA is not an appropriate body to be the sole regulator of environmental approvals for offshore petroleum activities in Commonwealth waters. As a result we have called for the EPBC Act to be amended to revoke the accreditation of NOPSEMA to approve significant impacts on matters of national environmental significance, or at a minimum that amendments be made to ensure that a ministerial 'call-in' assessment and decision-making power be provided.

In the original consultation on streamlining offshore petroleum environmental approvals, HSI raised a number of concerns regarding the proposed changes including a lack of accountability in decision-making and lack of transparency. We believe our concerns remain relevant to this Inquiry, whereby the decision to allow NOPSEMA to assess environmental impact has enshrined a less rigorous process for assessment and approval

of offshore activities that impact nationally significant matters of environmental significance into law, and should again be highlighted in light of any future planned exploration in the Bight.

Also to be considered for this Inquiry are the critical habitats (feeding and breeding areas) for the Australian sea lion, and the world's largest animal the blue whale in the area proposed for oil and gas exploration.

Studies released in 2015 show that the Australian sea lion is displaying continual population decline with recent population estimates indicating population size is now down to 9,652 individuals. A recent nomination by HSI has seen the Australian sea lion listed on the Finalised Priority Assessment List (FPAL) to be considered for listing as Endangered under the EPBC Act. Oil spills are already one of the main threats known to sea lions and further impacts to the species and its habitat as a result of any exploration will limit the ability of this species to recover from even localised mortality as studies believe it is probable that the species' ability to defend against mortality episodes has been compromised. Therefore, further declines in the species will likely lead to critical population levels.

The blue whale, which is listed as Endangered under the EPBC Act could also be heavily impacted by any exploration. The Bight is a known feeding and aggregation site for this species, and supports important breeding stocks. If oil and gas exploration were to occur, this could lead to the disruption of important behaviours for the species including reproduction, which coupled with a loss of habitat used for feeding, could seriously interfere in restoring blue whale populations.

A diverse range of marine life is found within the Great Australian Bight, including white sharks, seals and southern right whales, all of which are protected under the EPBC Act, and which should be considered throughout this Inquiry. The Bight is considered critical habitat for the majority of species found there, and therefore HSI strongly disapproves of any oil and gas exploration proposed now and into the future within this area.

Should you require further input or clarification in relation to this submission please contact Alexia Wellbelove, Senior Program Manager on [redacted] or [redacted]

Yours sincerely

Alexia Wellbelove
Senior Program Manager