

## **SUSTAINABLE AGRICULTURE & COMMUNITIES ALLIANCE**

**C/- SACA Secretary  
649 Warrumyea Rd  
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**30<sup>th</sup> January, 2016.**

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And the Independent Scientific Committee,  
Water Trigger Review,  
Environmental Assessment Division,  
Dept. of Environment,  
GPO Box 787. *Canberra* ACT 2600

### **SUBMISSION: WATER TRIGGER REVIEW**

Thank you for the opportunity for our organization to make a submission to the Independent Expert Scientific Committee (IESC) for their review of the water trigger.

The Sustainable Agriculture & Communities Alliance consists of farmers and community members spread across the Western District of Victoria. We have been active for over ten years on water conservation, soil health and sustainable farming issues.

#### **Our concerns are as follows:**

**The current legislation in most states does not include a trigger relating to water consumption by the fossil fuel industries of coal, unconventional gas mining, oil, or uranium mining.**

There are also questions relating to water consumption, leaching, pollution and treatment, methods of industries using acid-leachate mining, such as for uranium, gold and other metals.

As members of the farming community, we are also aware that the sale of large areas of farmland to overseas interests may lead to over-extraction from aquifers for the purposes of large-scale irrigation. This could possibly be in areas unsuitable for this form of agriculture. This is also a question that should be considered in the water trigger review.

Recent reports from the USA are that a combination of drought and over-extraction made much worse by the fossil fuel industry have resulted in areas such as California and Texas running out of water. (1)

**State legislation around Australia also needs to be updated in order to ensure compliance by industry regarding both pollution of water and over-extraction:**

At present any proposed unconventional gas or fossil fuel developments do not automatically trigger processes to assess, prevent or lessen the impacts of the fossil fuel industries on the amounts or purity of water supplies if industrial development is approved.

### **Cumulative Effects:**

The practice of some industries to use the “salami principle”, with a series of smaller scale applications rather than an application for the eventual area that will be encompassed needs to be taken into account; that is the **cumulative effects** and likelihood of further activities need to be assessed when applications for developments are received .

*Not only are the large amounts of water used by the fossil fuel industries a problem, but the water from unconventional gas mining by its very nature contains heavy metals and radioactive elements and salt from deep rocks, as well as the chemicals added for the drilling/extraction process.*

*Studies from Duke University, as well as a pollution incident here in Australia last year, confirm pollution with radioactive elements as a result of fracking.*

*Essentially, the fossil fuel industries convert water that could be used by future generations into water that is too polluted with chemicals, heavy metals and/or radioactive elements to be used for agriculture or potable drinking water.*

### **Over-Use and Official Under-Estimation Of Risks Of Pollution and Over-Extraction:**

Evidence from the USA is that the fossil fuel extraction industries are using more water than all other industries combined, including agriculture.

Due to pollution effects, the majority of water used for fracking is not re-used, and authorities also cannot account for all of the huge amounts of water extracted. Some of the polluted water is disposed of by using it on roads, ostensibly for keeping dust under control. This method of “disposal” is used in Australia, and poses a problem for health of people and agriculture. The pollution of water by coal mining has also hit the headlines in Australia.

**The vast amounts of water used by the fossil fuel industries here and overseas are now public knowledge and indisputable.**

**We believe that the review should recommend that the IESC conduct a review of the state and territory legislation, in order to include the fossil fuel industries in the water trigger process. Any legislative changes should also include an assessment of all the risks and preclude approval where over-extraction and pollution are deemed likely.**

### ***Long-Term Needs versus short-term industry:***

***The long-term values of clean water and productive soils need protection from the impacts of comparatively short-term unconventional gas and coal mining industries:***

There will be long and short-term catastrophic impacts on water, soils, agriculture and people’s health, if the unconventional methods of methane gas extraction are allowed to take place in Victoria. *This is not a mere possibility, but has already happened both in Australia and overseas.*

*The fossil fuel industries are now becoming “stranded assets” as the world is now making the change away from fossil fuels and converting to renewable energy such as solar, wind, co-generation, tri-generation, and energy conservation methods.*

*Land-based gas extraction of methane from coal, shale and tight gas formations is now feeling the beginning of this downturn, and it is now public knowledge that gas from unconventional sources runs out after fifteen years or even earlier.*

*In contrast, clean and abundant water supplies will always be in demand, and even more so as this century progresses. Drinking water and water for agriculture will be more and more valued and it is particularly important to protect our aquifers, rivers, and other water resources. Government needs to get its priorities right on this issue.*

### **Legislation alone will not be enough:**

There is a wealth of evidence from the USA that where gas wells pass through aquifers, well failure can result in contamination of water resources by chemicals, heavy metals and radioactive substances. The incidence of well failures is high.

There have also already been accidents in Australia involving the unconventional gas industry, as well as underground coal gasification.

The history of the fossil fuel industry is full of incidences of contamination, leaks, spills and industrial cover-ups. Legislation will not be enough unless the heads of corporations responsible for environmental problems are made personally legally culpable and liable to face imprisonment for over-extraction and pollution incidents.

**Summary: Any review of the legislation regarding the water trigger should include coal, oil, gas, underground gasification and uranium mining. All these industries have already caused depletion and/or pollution of water resources. Australia's water resources are needed now and into the distant future for food production and drinking water.**

Gillian Blair  
SACA Secretary

### References:

1. <https://www.rt.com/usa/fracking-water-drought-shortages-768/>