



29<sup>th</sup> January, 2015

To the Department of Environment,

**RE: The Wilderness Society Newcastle Campaign Centre Submission to the Independent Review of the 'Water Trigger' Legislation**

Thank you for the opportunity to reiterate our support for the 'water trigger' legislation and detail its effectiveness in protecting water resources and it's importance to upcoming Development Applications for coal and coal seam gas projects.

This legislation fills a gap in current Federal Environmental Law in that it looks specifically at transboundary water resources such as the Murray Darling Basin and Great Artesian Basin. These transboundary waters cannot be assessed by any one State Government in as the impacts will extend across to other States.

There are water supplies that may not cross State boundaries that also rely on the 'water trigger'. This is because they support Nationally significant industries, such as groundwater that supports prime agricultural land or major drinking water catchments for cities and towns. The impacts to these water resources must therefore be assessed at a Federal level.

In addition to addressing transboundary and nationally significant impacts the 'water trigger' legislation is essential as it fills gaps in the State assessments including thorough assessments of the social, cultural, environmental and economic uses of water and the cumulative impacts to large water resources.

The water trigger was very important in highlighting the risks from the additional 6000 coal seam gas wells proposed for Queensland by Santos. The impacts to local ecology, cumulative impacts on basins and changes to water quality would not have been given the research and attention required to prevent environmental damage should IESC not been involved.

The 'water trigger' legislation needs to be further strengthened. Ensuring that there are clear 'trigger levels' for impacts to water bodies that must not be surpassed would be one example of how the legislation could be even more effective. For example, major groundwater resources need 'trigger levels' that they must not be exceeded such as the lowering of groundwater due to coal seam gas extraction activities or increases in river methane levels. The lowering of groundwater levels in the Condamine Alluvium in Queensland due to coal seam gas activities is a devastating impact of coal seam gas. These proposed groundwater 'trigger levels' would be particularly important for the Great Artesian Basin as the Environmental Impact Statement for the Narrabri Gas Project is due to be released and this project has been designated a 'controlled action' and the 'water trigger' legislation has been applied.

Exclusion zones would be another way to strengthen the 'water trigger' legislation. For example excluding coal seam gas activities within recharge zones of important groundwater resources.

Should you wish to discuss this submission further please contact me on the details below.

Yours sincerely,

Prue Bodsworth

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