

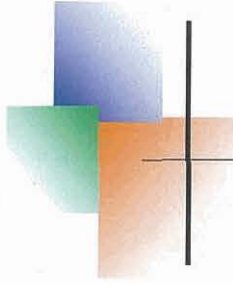
**Submission
No 162**

INQUIRY INTO COAL SEAM GAS

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NWES

Promoting ecologically sustainable development

North West Ecological Services

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RE: NSW Upper House Inquiry into coal seam gas mining

Dear Reader

There is a great deal of concern amongst residents of the Namoi catchment regarding the proposed expansion of coal seam gas mining. There is an application for some 550 well heads in the Narrabri area alone, and it seems that is the tip of the iceberg for what is to come.

People are concerned because it is seen as a threat to agricultural land, community way of life, flora and fauna, underground aquifers, and the great artesian basin.

Initially gas was seen as the clean green saviour that would provide the transitional energy source to allow phasing out of coal. But it is becoming increasingly apparent that there are major drawbacks, as I recently observed at the test bores in Pilliga State Forest.

The major drawbacks include;

- Potential of cross contamination and polluting of ground water
- Likelihood of losing ground water resources by drilling through aquifers
- Saline water spillage resulting in tree deaths, salt scalds and contaminated soils.
- Overflow of drill ponds leading to contamination of creeks.

- Treated waste water changing the ecology of local creek systems and reducing water quality.
- Use of large volumes of water for drilling and fracking, when the water resource is already over allocated.
- Construction of major toxic water storage impoundments and associated environmental impacts.
- Toxic water storages left open to wildlife, leading to animal deaths.
- Clearing and fragmentation of high conservation value vegetation.
- Destruction of large areas of habitat for threatened species.
- Dramatically increased fire risk.
- Threats to important groundwater dependent ecosystems and wetlands
- Pipelines degrading important agricultural lands and degrading high conservation value areas such as Travelling Stock Routes
- Spreading invasive plants through areas of high conservation value.

For the residents of the area these concerns far outweigh the potential economic benefits. They feel threatened that they have no rights to stop the drilling on their land, they are worried about the security of their water entitlements, and they don't want their community to change for the worse.

Allowing the coal seam gas industry to go ahead will:

- Transform rural landscapes into industrial zones
- Forever change the socio-economic profile of communities, with a fly-in/fly-out workforce that does not participate in the community.
- Undermine regional communities who depend on cohesion and resilience
- Represent a serious threat to water resources, including the Great Artesian Basin
- Result in farmers losing control of their land
- Provide property rights to miners rather than the custodians of the land
- Undermine the rights and interests of Traditional Owners
- Represent a health risk due to methane leakage and aquifer contamination.

The potential economic gain cannot justify the risks involved. There should be a full moratorium on all forms of coal seam gas drilling until the environmental, social and health impacts have been rigorously and independently assessed.

People view the clearing of remnant vegetation for mines as the government creating one law for farmers and another for miners. Coal seam gas exploration and mining must be subject to all relevant environmental legislation, including the native vegetation and water management laws. The community must also have full legal rights to challenge and enforce environmental laws under which the coal seam gas companies are operating.

Landholders should not be made feel second rate citizens with no rights. Agriculture has been the backbone of the nation and will continue to be, unlike coal and gas mining. Landholders must be given the right to refuse consent for coal seam gas exploration or production on their land.

An assessment is required to identify areas of least environmental concern where exploration and mining are unlikely to have a significant impact. Such an assessment would identify all areas of important bushland, valuable farmland, groundwater aquifers, residential areas and public lands to be excluded from coal seam gas exploration and mining.

There are real concerns about ground water pollution that could destroy the artesian water resource. All chemicals used in coal seam gas drilling or fracking must be assessed by the chemical regulator for use for that purpose before being approved for use.

BIODIVERSITY IMPACTS

The Namoi catchment has numerous threatened species of flora and fauna, and endangered ecological communities which are listed for protection under the Threatened Species Conservation Act and Environment Protection and Biodiversity Conservation Act.

Those species and communities have been listed for protection because they have declined to the point of becoming rare, largely because of the impacts of clearing, feral predators, and the change of land use to agriculture.

The majority of the rare species and communities in the region now occur in the less disturbed areas of State Forests, State Conservation Areas, Roadsides, and Travelling Stock Routes.

The proposed mining for coal seam gas will directly impact on those locations, impacting on the habitats of many of the threatened species and endangered ecological communities.

Look at the aerial photos of the small area of test bores in the Pilliga State Forest. The proposed gas production is going to be at a much larger scale, with up to 2,400 hectares of clearing of remnant vegetation required, which could blow out to 8,000 hectares if the whole licence area becomes a gas field.

The clearing of 2,400 hectares of threatened species habitat (which is already limited in the region), is a significant impact that will reduce the viability of populations of threatened species, and reduce their chance of recovery.

The actual area of impact will be far greater than that, when the impacts of fragmentation, edge effects, feral animal invasion, and potential for weed invasion are added to the equation, it becomes obvious that the proposal could destroy the integrity of the forest over the lease area.

The clearing for well heads, access tracks, and pipe lines will provide inroads for feral animal and weed invasion, and the cleared edges will enable aggressive and territorial species such as the Noisy Miner to displace other birds.

Viable areas of habitat that are currently occupied as territories of breeding pairs will be fragmented by the cleared areas, effectively reducing potential territories considerably.

Fire is already a problem in the forest, adding gas pipe lines, well heads and human presence will increase the risk of catastrophic fire. Surface water availability is limited throughout the forest, increasing water points that could then be polluted could affect the distribution and health of fauna.

Travelling Stock Routes and roadsides are well known to be hot spots for rare plants and the most intact examples of several endangered ecological communities. These locations are currently being considered as potential alignments for the gas pipeline.

Whilst these areas don't have the integrity that the Pilliga State Forest has, they are none the less highly valuable for their contribution to the conservation of flora and fauna and endangered ecological communities, and are vital as corridors to enable gene flow across the landscape, which will be essential for plants and animals to adapt to climate change.

Any earthmoving disturbance in Travelling Stock Routes and roadside reserves could eliminate rare plants and degrade endangered ecological communities. The threat of introducing serious environmental weeds via the construction machinery and vehicles is very high. Such environmental weeds have already destroyed thousands of hectares of endangered ecological communities elsewhere in the region.

Often off sets are proposed by mining companies as compensation for clearing of native vegetation. From a fauna and flora point of view then are not worth the paper they are written on. Nothing can replace the loss of suitable habitat that often takes centuries to create.

From a biodiversity point of view the Namoi catchment cannot afford to loose more native vegetation. The current destruction of Leard State Forest has already made it impossible for the Namoi CMA to meet its biodiversity targets.

Yours sincerely
Phil Spark