

# The Georges River Environmental Alliance

The Georges River Environmental Alliance is a community and environmental coalition representing individuals and groups from both the upper and downstream catchment of the Georges River, home to more than a million people.

c/-14 Marine Drive

Oatley, NSW, 2223

[go\\_river@hotmail.com](mailto:go_river@hotmail.com)

## **Attention; Director, Mining and Industry Projects**

### **An Objection to the Apex Gas Exploration Project (Mod.2) Proposal 07\_103 MOD2**

#### **Northern Illawarra**

The Georges River Environmental Alliance (GREA) represents a network of individuals and groups that aim to protect and advocate for the natural lands, biodiversity and water quality of the Georges River catchment. Our interest in this project stems from the fact that the Woronora Special area, its water catchment and drinking water dam, fall within the greater Georges River catchment. Further the Woronora Dam is part of greater Sydney's drinking water resource.

We argue that the ecological integrity and water of the Woronora Plateau in general, and the Woronora Special Area in particular, should remain protected and intact. Drinking water is without substitute in terms of life support. The same cannot be said for CSG.

We object in the strongest possible terms to any exploration or subsequent production consents given for CSG drilling in relation to this proposal.

Firstly, there is an emerging body of credible evidence in Australia and overseas, where this novel technology is being rolled out, of damage and unacceptable levels of risk to water, productive land and sensitive natural areas. See for example Submission No. 330 from Dr Stuart Khan to the NSW Parliamentary Coal Gas Seam Inquiry. Much more research needs to be done, and in the meantime the Precautionary Principle should be applied. We do not accept that this gasfield is needed in order to meet NSW energy needs, and in any case gas production involves far too many risks.

Since the initial approval in 2009 there has been an increasing level of community alarm and objection, and any past assumption that there is a social license for this or any other CSG activity in this area has demonstrably been proved wrong. There have been a number of well attended mass public demonstrations and a petition signed by 30,000 has been presented. All the local councils of Wollongong, Campbelltown and Sutherland object to CSG activity in their LGAs.

In the GREA presentation to the Planning Assessment Commission of 2011 for the approval of a 16<sup>th</sup> borehole in this project area, the following 4 important points were.

- Endorsement of the NSW Office of Water's concerns, in regard to the significant upland swamp within 40 metres of this proposed borehole. We believe no upland swamp in a drinking water catchment should be exposed deliberately to a level of risk, at this stage impossible to quantify, when avoidance of damage, in the first place, is the better alternative. The 'negligible damage' standard can only be ensured by non approval.
- Endorsement of the NSW Office of Waters recommendation that a network of groundwater monitoring bores be established before exploration. Surely before any disturbing CSG activity, base-line data should be acquired, so as to ensure that future decisions can be based on scientific knowledge.
- GREA was deeply disturbed that the general public is locked out, and thus will be unable to in any way observe or be aware of the performance of this operation, if approved. It is in an area of our interest, it is both of incredible utility as a drinking water supply, and of intrinsic natural values as well.
- GREA was deeply disturbed at the possibility of any waste or produced, water on-site. The very idea of contaminated water kept on-site in a drinking water catchment remains totally unacceptable. Common sense suggests it is as stupid as householders keeping toxic chemicals in kitchen food cupboards or in the refrigerator.

GREA completely re-iterates these former concerns, and up-dates them with reference to the current proposal.

Even the act of data collection would be damaging in upland swamps. Exploration and any subsequent commercial production operation of CSG drilling, is unacceptable. The conservation value of these swamps has been further recognised in March 2012 with them being listed as Endangered Ecological Communities.

We question the adequacy of any of the sumps, mud-pits (lined or unlined), baffle tanks, spill control equipment and stormwater detention basins in relation to this proposal. Whilst seemingly essential, they will still be at risk of failure, and magnify the extent of the disturbance footprint on the landscape. No risk management plan, nor elaborate range of engineered solutions will eliminate the unacceptable level of risk posed in this drinking water catchment, by CSG operations.

Overall GREA does not accept that any proposed remediation of damaged swamps and disturbed vegetation is appropriate. Avoidance of damage is desirable through non-approval. There is no proposed remediation in any case, for the greatest of the unquantified and so far unmeasurable risk, and that is groundwater and aquifer depletion and contamination.

We also are concerned for the threatened species, Prickly Bush Pea.

We would finally urge this approval process take into account the precedent established by the PAC for the BSO in 2010. Some of its findings are generally applicable to other approval processes for projects characterized by high levels of novelty, risk and uncertainty.....that certainly applies to CSG around Darkes Forest.

To quote directly;

*It is 'no longer a viable proposition to do more than negligible damage to water resources'*

*The 'benefits to the whole society of protecting significant natural features, is of a similar magnitude to the mining profits given up'*

*Where there is both a significant threat and a substantial level of uncertainty the principle requires... 'a significant degree of precaution, with the safety margin falling on the side of the environment'.*

Those 3 benchmark statements should be applied to CSG in relation to damaging impacts on swamps, streams and aquifers, most particularly in drinking water catchments.

Yours Faithfully

Sharyn Cullis

Secretary, GREA

14/9/2012