

Failings by Federal and NSW Governments which should prevent further consideration of this project until they are completed.

The failure of government to complete and/or implement recommendations from the following government investigations is not acceptable. The inability to demonstrate significant economic benefits to the State is not acceptable. Where and how will this gas commodity be marketed? And, the lack of resource capacity to ever enforce compliance of any likely conditions of approval mean this project should be opposed and rejected.

- A Bioregional Assessment Plan has not been completed for the Namoi Subregion, and the necessary financial resources for CSIRO to fund the assessment apparently will cease on June 30th 2017. The necessity to complete this assessment before this project is approved is essential.
- The Namoi Catchment Water Study July 2012 found several groundwater monitoring criteria need to be commenced and provide sufficient data before an informed judgement could be made on such a project as this. The monitoring recommendations have not been completed.
- On September 30th 2014, the Chief Scientist of NSW, Professor Mary O'Kane, released her Final Report into Coal Seam Gas (CSG) mining. The report concluded there are genuine risks to water supplies and public health from CSG development specifically. The report identified the following possible risks from coal seam gas mining:

1. Pollution of surface waters and drinking water supplies;
2. Reduction in surface water flows;
3. Reduction, depressurisation or contamination of groundwater;
4. Significant seismic events;
5. Reduction in air quality;
6. Soil erosion and contamination;
7. Contamination of the food chain;
8. Salt permeation of soil and water resources; and
9. Human exposure to dangerous chemicals.

In response to these risks, the report called for a complete overhaul of every single aspect of CSG mining in NSW. It recommended extraordinary and far-reaching reforms to the regulation and management of unconventional gas mining in this state. The report states, "There is a need to understand better the nature of risk of pollution or other potential short- or long-term environmental damage from CSG and related operations, and the capacity and cost of mitigation and/or remediation and whether there are adequate financial mechanisms in place to deal with these issues." The report also highlights, "the need for Government and industry to approach these issues with eyes wide open, a full appreciation of the risks, complete transparency, rigorous compliance, and a commitment to addressing any problems promptly with rapid emergency response and effective remediation."

Most notably, the report recommended:

1. The development of an entirely new legal framework for unconventional gas mining and other extractive industries;
2. Restricting CSG to 'carefully designated' areas, taking into consideration factors such as geology, hydrogeology and land use;
3. Revised arrangements for land access to increase fairness and strengthen protections for landholders;
4. The creation of a new and thoroughly independent environmental regulator for the industry, a regulator that is responsible for setting health and environmental targets;

5. Thorough health risk assessments prior to project approval to identify risks to human health;
6. Comprehensive environmental monitoring, including baseline monitoring, with data to be held in a publicly accessible data repository;
7. Further research into the fate and transport of chemicals and their biological interactions;
8. The development of an effective and transparent reporting and compliance regime;
9. The development of a robust and comprehensive policy of appropriate insurance and environmental risk coverage, including an environmental rehabilitation fund; and
10. The establishment of a standing body of experts to advise government on the industry.

The Chief Scientist recommended, "**All of this needs to take place within a clear, revised, legislative framework which is supported by an effective and transparent reporting and compliance regime and by drawing on appropriate expert advice.**"

Even if all of the recommendations above were implemented, the report found that **CSG could still only be considered with two substantial provisos: if a solution can be found to the vast amounts of toxic waste water and salt which it produces, and in circumstances where geology and hydrogeology can be adequately characterised.** Neither of these two provisos have been met.

In light of the findings and recommendations of this final report by Chief Scientist of NSW, Professor Mary O'Kane, into coal seam gas (CSG) mining why isn't the NSW Government employing the precautionary principle?

I require my government; to stop this development; to buy back the PEL licenses, and focus government energy and funding on encouraging renewable energy sources.