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IESC Secretariat
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601
Submitted by email: IESCsecretariat@environment.gov.au

Assessing Groundwater-Dependent Ecosystems: IESC Information Guidelines Explanatory Note

Dear IESC Secretariat

Introduction

Cotton Australia welcomes the opportunity to provide comment regarding the IESC's Information Guidelines Explanatory Note concerning Assessing Groundwater-Dependent Ecosystems (the Explanatory Note).

As previously communicated to the IESC, the cotton industry is an integral part of the Australian economy. It is worth over \$2.3 billion in export earnings for the 2016-17 season and employs on average 10,000 people. Cotton Australia's members recognise that both the mining and CSG industries offer potential economic benefits to Australia.

However it is also Cotton Australia's view that these industries require proper regulation and enforcement, without such they pose significant risks to the Australian cotton industry. Our long-held policy principles include:

- Protecting the sustainability of aquifers and surface water sources that service irrigated and dry land cotton production and their communities.
- Protecting high value agricultural land from CSG extraction and mining activities.
- Minimising the social impacts and implications of all mining project activities on both rural communities and miners themselves.
- Preserving the amenity of traditional cotton growing regions. This includes, but not limited to, impacts from dust, noise, air-blast, light, traffic movements, and vibration.

Cotton Australia is therefore highly supportive of the work IESC undertakes and its significant contribution to the knowledge of groundwater systems as well as potential management approaches for industry.

The Explanatory Note

Cotton Australia notes the IESC's efforts to make the document more accessible to the non-technical reader. Also that the Explanatory Note takes an approach similar to the previous round of guideline revisions open for comment in March this year. That is, the proponent is encouraged to consider the accumulative impacts of the proposed and current projects in the vicinity. In that respect Cotton Australia would strongly encourage the sharing and accessing of existing data sources between projects via the use of online data portals.

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Regarding technical observations, Cotton Australia would draw IESC's attention to some of the Cotton Research and Development Corporation (CRDC) funded research projects. We consider one of our most important roles to be providing research direction, ideas and resolution to issues raised by our growers in order to inform the CRDC's research and development program.

In this instance, the CRDC has funded research specifically identifying how to assess and monitor groundwater ecology (subterranean GDEs) and ecosystem health. This work (now published) provides a framework for assessing subterranean ecosystems, and is currently being trial on cotton farms in north western NSW.

Cotton Australia would encourage the ISEC to incorporate the following into the Explanatory Note:

- Microbial activity and stygofauna impact water quality and Groundwater quality is a known influence on both subterranean and surface aquatic GDEs. The IESC Guideline should be encouraging proponents to monitor water quality (as this directly impacts subterranean GDEs) as well as identify standards when it is likely that water quality will be impacted by development
- Adequate sampling techniques need to be provided in the IESC Guideline, new methodology and sampling techniques for microbial activity and stygofauna have been developed. Reference: Korbel KL & GC Hose (2017) *The weighted groundwater health index: Improving the monitoring and management of groundwater resources*

Finally, with regard to the methodology to identify a potential GDE, this is an area where the knowledge is still developing. Cotton Australia notes that there will be further improvements in accuracy as time goes on (as noted in 5.2.3) and these should be able to be incorporated into future revisions of this Explanatory Note.

Should you have any questions regarding our submission please do not hesitate to contact me on 02 9669 5222 or jenniferb@cotton.org.au.

Yours sincerely,



Jennifer Brown
Policy Officer
Cotton Australia