

15 March 2018

IESC Secretariat  
Department of the Environment and Energy  
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Submitted by email: [IESCsecretariat@environment.gov.au](mailto:IESCsecretariat@environment.gov.au)

### **Update to the Information Guidelines and new Explanatory Note, Uncertainty Analysis in Groundwater Modelling**

Dear IESC Secretariat

#### **Introduction**

Cotton Australia welcomes the opportunity to provide comment and, as the industry's representative body to speak on behalf of cotton growers regarding the update to the *Information Guidelines* and new *Explanatory Note, Uncertainty Analysis in Groundwater Modelling*.

The cotton industry is an integral part of the Australian economy, worth over \$2.3billion in export earnings for the 2016-17 season, and employing on average 10,000 people. Our members represent 152 Australian regional communities across NSW, Queensland and now into Victoria.

While we recognise that both the mining and CSG industries offer potential economic benefits to Australia, without proper regulation and enforcement these industries also poses 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.

#### **Information Guidelines**

Cotton Australia acknowledges that IESC updates the Information Guidelines at regular intervals to ensure the content reflects current science and practice. Also that its guidance is clear to understand.

On this occasion we note there are three elements to the revisions:

1. Relocation of the Risk Assessment to the front of the document with the intent of establishing it as an overarching framework that will then guide the entire process.
2. For proposals that are an extension to an existing activity, there is a stronger connection to data from the existing project and with the intent that this is used in the new project's development.
3. Improved transparency about potential impacts and the underlying data used for the Environmental Impact Statement's assumptions.

Cotton Australia welcomes these revisions particularly the emphasis of the Risk Assessment as an overarching framework and reframing the Guidelines to 'join up' projects rather than treat them as discrete activities.

Combined the three changes should expand the Environmental Impact Statement's (EIS) focus to consider the accumulative impacts of a number of projects across a particular landscape. It also compels the project proponent to better substantiate its EIS assumptions.

As a final observation, landholders are long term residents of the community who are of the view that the land concerned is all of the community's asset which is being 'loaned out' as a result of an approved mining or csg extraction project. In that respect landholders want their community's assets returned in fit and proper order for the community to continue to derive aesthetic or economic benefit from it. Similarly they consider that just as they operate within regulatory/compliance requirements, so too should neighbours who are involved in coal of CSG extraction industries.

Since changes to the landscape can be subtle and emerge over time Cotton Australia suggests the IESC reframe the text about modelling to encourage a time frame greater than two to three years.

#### **Explanatory Note, Uncertainty Analysis in Groundwater Modelling**

Regarding the new Explanatory Note, Cotton Australia is restricting comments to how well the document can be understood by concerned members of the wider community. These readers will be concerned about a proposed project and hence will also be reading the Explanatory Note to understand elements of the project's EIS.

The project proponent will have engaged the relevant suite of technically trained experts to interpret and apply the principles around identifying and managing uncertainty. However, these skills are not necessarily held by concerned member of the wider public also referring to the Explanatory Note. In fact use of the terms 'risk' and 'uncertainty' let alone the mere suggestion of 'uncertainty' is likely to be viewed with alarm.

In that respect Cotton Australia would encourage the IESC to insert supporting commentary in the documents for this wider audience and also consider developing separate education materials. The inclusion of a decision-making flow diagram or a summary table are two examples that would help explain the technical process. It would also help the wider community to be confident that regulators are making adequately informed decisions due to the voracity and robustness of the Explanatory Note.

#### **Conclusion**

As a final comment, Cotton Australia is highly supportive of the work IESC undertakes and its significant contribution to the knowledge of groundwater systems and potential management approaches for industry. The opportunity provided by the recent Roundtable to exchange views was appreciated, so too the value of hearing first hand from the regulators themselves about the tools the IESC has updated.

Should you have any questions regarding our submission please do not hesitate to contact me on 02 9669 5222 or via Policy Officer Jennifer Brown at [jenniferb@cotton.org.au](mailto:jenniferb@cotton.org.au).

Yours sincerely,



Adam Kay  
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