

Submission on the draft update of the IESC Information Guidelines

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Healthy planet, **healthy people.**

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Doctors for the Environment Australia

Doctors for the Environment Australia (DEA) is an independent, self-funded, non-government organisation of medical doctors in all Australian States and Territories. Our members work across all specialties in community, hospital and private practices. We are supported by a Nobel laureate, recipients of the Australian of the Year award and many other distinguished health professionals. We are committed to bringing health risks from climate change and pollution to the frontline of attention, to minimise public health impacts and to address the diseases local, national and global caused by damage to our natural environment.³

Preamble

The Earth's fresh water supply is a finite source upon which human health, wellbeing and indeed survival depends. The work of the IESC is integral to ensuring that its use is sustainable. IESC decisions therefore depend not only on hydrology and related sciences but also on climate change science and its impacts through reduced precipitation and increased evaporation. In turn these depend on climate modelling and also on the rate of climate change which relate to effectiveness of government action by many governments which at present time is inadequate. So, risk assessments are necessary for possible outcomes. We regard water management as a health issue and we evoke the application of the precautionary principle because of the number of variables or 'unknowns'.

Climate change is already a major issue in Australian decision-making: several regions of West Australia and South Australia have a Mediterranean climate which has already become drier and will be increasingly so; therefore, water availability is an increasing concern. Other subtropical and tropical regions where resource development takes place will be subject to more extreme rainfall events increasing the number of flooding and potential contamination events.

Some proponents through their organisations state or believe that the IESC is part of 'green tape' or 'red tape', an impediment to progress and part of a conspiracy to prevent development. Some governments are reluctant to use the IESC in case it delays development. They may disregard or contest the report once made and the public is easily swayed by their statements when they indicate that their economic future is threatened if development does not proceed.

Ignorance is an important factor leading to conflict and unnecessary conflict has existed for 15 years in relation to unconventional gas development. During this time, DEA has made analyses and submissions on the health aspects via the EIS process when one was called for. We will develop this issue further below.

The relevance to your specific area of work and any views on its uptake and adoption.

This submission is written by health professionals and we regard the work of IESC as essential to the maintenance of human health.

It is our understanding that the IESC was instituted by a previous government to assuage concerns from farming and health groups (DEA was one of the latter). Subsequently, requests for more specific health input over chemicals and coal hydrocarbons resulted in the intent to form a health group through NICNAS, but this never came to fruition due to change in government.

However, the need for health input has subsequently increased with peer-reviewed research papers indicating health impacts in US gas fields. The current situation on health and CSG is detailed in our submission on Narrabri⁴ and several submissions on proposed unconventional gas projects in NT classified as 'Shale gas'.^{5, 6, 7, 8}

We have noted the reports of IESC on Narrabri but unfortunately there is no report from the IESC on the NT because the gas is regarded as 'shale gas'. Yet there are great concerns about the availability of water in NT and accordingly it would be important that IESC was requested to report.

We have health concerns regarding coal mining in most states. For example, we have worked for 5 years with submissions to governments and letters to Ministers on the New Hope Coal (NHC) proposal which has been subject to successive reports for IESC.⁹ We have provided evidence of persistent air and noise pollution over several years at Acland with inadequate action by the proponent and Queensland government. We had expert witnesses at the Land Court. There are many other cases of equal concern in Australia.

This summarises our role as health professional in the realm of fossil fuel usage. With regard to 'adoption' of the Information Guidelines we have no evidence for or against, but in general we can say human health is commonly sacrificed in the joint interests of governments and the fossil fuel industry and we suspect that some state governments would prefer the IESC was not consulted. Increased education of the community on the role of the IESC would increase pressure for the IESC to be used.

In conclusion, having read the hundreds of pages of the Land Court judgement¹⁰ in the NHC case, we find it amazing that the indolence of governments and proponent continued despite a succession of reports from IESC and from DEA. A case study on the NHC mine by experts using evidence from many sources might indicate ways in which both DEA and IESC might gain more traction on water and on health in the future.

The content of the draft update of the Information Guidelines, particularly any areas where further explanation would be useful

The Title of the Guidelines

This is confusing. We note the introduction of the word 'proponent' since the previous edition. Are these the Guidelines for government as well? If so they are not a proponent; under EIS and HIA guidelines they should be the arbiter. It is clear that often they act as a proponent, but this should not be so and indeed it is one cause of conflict with communities. This leads to the question as to whether there should be simpler guidelines for Government and elected representatives for, in our discussions with many, it is clear many do not understand the need for the IESC or its role.

Introduction to the Guidelines

This needs an educational introduction along the lines of the first two paragraphs of the preamble to this submission.

Baseline water studies

It is apparent that when contamination occurs during development it is sometimes contended by proponents that the abnormality is not due to the development, yet no baseline studies are available. The word "*should*" in the sections on water must be changed to "*mandatory*". Further, the analysis must be extended to include coal seam hydrocarbon contaminants and other bioactive substances, for example carcinogens.

Guidelines must include more restrictions on the chemicals used which might contaminate water and those used must be reported and not allowed to be hidden under commercial-in-confidence. This information is essential for any long-term studies if future health effects are reported. The same Guidelines on chemicals should apply to all states; in our view WA should be commended for its position.

The Guidelines on chemicals might also use some educative statements for industry leaders, some of whom propound some chemicals as safe, because they are in the cupboard under the kitchen sink in most of our houses. Long term exposure to traces of a chemical is also an issue, beyond acute exposure, in delayed health impacts.

Health Risks with Shale/ CSG development

The health risks of both Shale gas and CSG are similar and differ only quantitatively. Perhaps this is for the IESC to explain to government using its own expertise and that of public health experts, assisted by NICNAS. Potential harms to human health and agriculture are arising because Shale gas development is not within the remit of the IESC e.g. in the Limestone Coast of South Australia. Hopefully governments will ask for the IESC's view on this issue. We are also concerned that some developments are defined as Shale to avoid scrutiny by the IESC.

Potential options to increase uptake and adoption

The guidelines need a much more reader-friendly approach to increase understanding and acceptance of process. Simplified guidelines for elected representatives, most of whom do not have a background or understanding of science, would be helpful, so also would a leaflet for community organisations. IESC is not a decision or policy maker and does not engage directly with community stakeholders, therefore supply of informative material is essential for hundreds of community groups concerned by fossil fuel development.

Any Guideline to the vital work of the IESC should include an educative message of its importance, for many proponents, governments, elected representatives and interested members of the public do not accept or understand the work of the IESC.

It is also essential that acceptance of IESC reports by community groups is enhanced by impartiality. As an example, the 2015-2016 IESC Report stated: "*The expected production of the proposed coal mining developments ranged from 4.2 million to 55 million tonnes per year and represents a sum total of 122.7 million tonnes per year.*" There was no mention of protection of water resources for agricultural land as a key outcome, for example, on the Liverpool Plains.

References

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