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To: info@frackinginquiry.wa.gov.au
Subject: Independent Scientific Panel Inquiry into Hydraulic Fracture Stimulation in WA - Public Submission
Date: Monday, 19 March 2018 8:55:21 PM

Mr and Mrs Davies

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To the Independent Scientific Panel,

We thank the Panel for the opportunity to provide input into the Inquiry into Hydraulic Fracture Stimulation (Inquiry) on the onshore environment of Western Australia, outside of the Perth metropolitan, Peel and South West Regions. We understand that the primary two areas that have been identified as potential resources for hydraulic fracture stimulation include the Perth Basin, and the Canning Basin in the midwest and Kimberly regions. As per the terms of reference for the Inquiry, we wish to comment on the potential impacts that will guide the assessment of overall risk of hydraulic fracture stimulation in these and other potential regions, and the potential regulatory framework.

There is a risk that a significant amount of greenhouse gases could be released during hydraulic fracturing and associated activities. However, there is no policy or regulatory framework established by the Government of Western Australia to guide the assessment of proposals that result in significant greenhouse gas emissions, nor any mandatory mitigation measures that are required should proposals be approved. A significant climate change policy vacuum exists within the Western Australian Government, with negligible coordinated leadership and long-term planning across all areas. We are concerned that the lack of clear State government policies and priorities, including emission reduction targets, will mean that the long-term climate change impacts of hydraulic fracturing will not be given adequate consideration by the Inquiry.

There is also the potential risk of impacts to surface and groundwater quality. In Western Australia, groundwater aquifers are among the most valuable potable water resources. It is imperative that a thorough understanding of any potential impact of hydraulic fracturing on short and long-term water quality is understood, including following the decommissioning of wells and ponds. In addition, while the amount of water required for hydraulic fracturing varies according to the type of well, it is anticipated that significant amounts of water will be required. It is critical that the impact of water extraction on groundwater-dependent ecosystems is understood, so that environmental water provisions are maintained. Many ecological communities are already experiencing stress from reduced rainfall in Western Australia, which could be exacerbated by further licence allocations and push ecosystems over the critical threshold for survival.

Direct impacts on biodiversity are anticipated through vegetation clearing and fragmentation for wells and associated infrastructure. However, indirect impacts through increased exposure to weeds and feral animals are also expected, as aided by disturbances. This should be considered by the Inquiry, particularly for pristine condition vegetation in remote areas.

We are also concerned that hydraulic fracturing and its associated activities could impact Aboriginal heritage through damage to sites of cultural significance. We feel it is important to support Aboriginal land custodians in the traditional management of culturally significant lands,

and endeavours to keep this ancient culture alive and thriving. Hydraulic fracture stimulation is not compatible with traditional land management techniques or the preservation of culturally significant sites.

We also feel that the industrial scale of hydraulic fracture stimulation and number of wells required means that the likelihood of well failures that can irreversibly pollute the environment is significant. If the moratorium for the State is to be lifted, we believe the regulatory mechanisms related to greenhouse gas emissions and environmental pollution must be strengthened, including State government auditing and monitoring of compliance, strong and enforceable penalties for breaches of regulations, and sufficient bonds from proponents for rehabilitation and decommissioning of sites.

We also believe that it is important for the Panel to consider the cumulative impact of all the potential environmental and social risks for each prospective region in Western Australia. In the absence of full scientific evidence or certainty, the precautionary principle should be applied by the Panel while undertaking the Inquiry. If there is uncertainty in any of the environmental or social impacts that may be affected by hydraulic fracture stimulation, the Government of Western Australia should uphold the moratorium for the State, or impose a ban for the remaining areas not currently covered.

Yours sincerely,
Mr and Mrs Davies