

Sarah Moles



**There is nothing confidential in this submission and I consent to it being made public.**

I make this submission as a member of the Great Artesian Basin Coordinating Committee (GABCC) representing the conservation sector and I endorse the GABCC's group submission.

To those sentiments I wish to add the following:

Since 2013 there has been no Standing Committee on Environment & Water. GABCC advice has therefore had no formal mechanism, process or structure via which to feed into the COAG process. The GAB is a resource of national importance and all levels of government need to understand this and to be aware of emerging issues and challenges.

The start of the Strategic Management Plan (SMP) preparation period coincided with a changing of the guard and a significant decrease in the number of jurisdiction representatives. Much corporate knowledge has therefore been lost from the GABCC in the past 5 years as governments cut funding, as highly experience staff in all jurisdictions have retired or moved to other agencies and because the Water portfolio was moved from the Environment to the Agriculture Department for political purposes. A key result of the latter, in my opinion, is that the current generation of Commonwealth staff has little 'skin' in the area of water policy particularly where the GAB is concerned.

That would be fine if the Commonwealth was willing to listen, learn and rebuild its understanding of the GAB and those who live with it. And it would be fine if the Commonwealth accepted, respected and valued GABCC's collective input and advice. But in my opinion this has not been the case.

I strongly concur with the statement that the Draft SMP is not a strategic plan but a draft plan for governments to make a plan.

While I support the vision, it is cloudy and could be subject to a range of interpretations. Its intent would become much clearer if the draft SMP included targets.

When I joined the GABCC more than a decade ago, the target pressure surface was a key strategic issue and the subject of much discussion. The Roma SMP consultation meeting provided evidence that the target pressure surface remains an issue of great interest to GAB landholders.

There are gaping holes in the governance section and scant detail on roles, responsibilities and accountabilities. These gaps must be filled to give the community clarity about who is doing what, the timelines for those tasks and performance indicators to gauge progress.

While I have seen - and continue to see – real value in occasional joint meetings with the Lake Eyre Basin CAC, I do not support the amalgamation of these 2 very different bodies.

In addition to the lack of detail on governance, I am concerned that key data has not been incorporated into the SMP. Bore rehabilitation and maintenance costs are going to increase substantially in coming years. The bore audit data was completed during the preparation of the SMP and should be incorporated into the document. This information should form the basis of a long

term works program to ensure the rehabilitation and /or maintenance of bore infrastructure across the basin. It should also be used to develop an investment strategy to ensure funds are available to undertake these works.

Finally, I'm disappointed that the draft entirely missed the opportunity to deal with the serious challenges facing the GAB from increased mining and unconventional gas extraction. The lack of detail around protecting existing GAB water users from the impacts of large new users worries me greatly. If we are to rely on States' Water Plans to manage or mitigate these (quantity and quality) impacts I fear there will be significant detrimental impacts on existing users and the resource itself.

I hold a strong view that the Draft SMP is not adequate in its current form and considerable work needs to be done before it will gain community confidence and acceptance.

Yours sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the bottom, positioned above a solid horizontal line.