Dear Sir/ Madam

Comments on the Draft Great Artesian Basin Strategic Management Plan 2018

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to forward comments regarding the Draft Great Artesian Strategic Management Plan 2018.

Wildlife Queensland is one of the longest established and most respected wildlife-focused conservation groups in Queensland. With over 6500 supporters spread across branches throughout the State, Wildlife Queensland is a strong voice for our wildlife and its habitat. Wildlife Queensland is apolitical. Our aims include:

- **Preserve** the flora and fauna of Australia by all lawful means
- **Educate** the community in an understanding of the principles of conservation and preservation of the natural environment
- **Discourage** by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- **Encourage** rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

Our aims reflect a strong interest in conserving our biodiversity and natural landscape. Wildlife Queensland is not opposed to the sustainable use of ground water and the waters of the Great Artesian Basin (GAB). The emphasis is on sustainable. However recent research by CSIRO indicated the GAB is a declining resource and no longer is in ‘steady state’ as once assumed. The GAB has been the life blood of many pastoral activities and natural springs in Queensland and other states for many years and strategies must be put in place for that to continue.

Wildlife Queensland takes this opportunity to provide comment on the Draft Strategic Plan. Comments will focus on matters of particular interest to Wildlife Queensland. Furthermore because Wildlife Queensland has elected not to comment on various components of the draft strategy it should not be construed necessarily as acceptance. In addition Wildlife Queensland comments will be directed to the Queensland situation as there are organisations in other jurisdictions with far better knowledge and expertise. With regard to Aboriginal and Torres Strait islander values, cultural heritage and other community values Wildlife Queensland has
no rights to speak on behalf of these First Nation peoples. However we urge that their goals and aspirations be not only listened to but acted upon.

The draft plan highlights major achievements since 2000. Such findings include an improvement in the awareness of the Basin water management, pressure stabilising under certain conditions, reduction in uncapped bores and bore drains and advice to Ministers responsible for overall management. The draft plan also addresses the issues and challenges facing the GAB. In light of these findings, issues and challenges Wildlife Queensland continues to be amazed at the attitude displayed by the Queensland Government with regard the use of the GAB by mining and gas extraction industries and the proposed CO₂ injection into the Precipice Sandstone aquifer.

There is no doubt that some mining and unconventional gas extraction industries pose a serious risk to the GAB. The draft plan does not address the unsustainable and totally inequitable arrangement that allows the mining and gas industries for all practical purposes unfettered access to the GAB waters. Access to the waters from the GAB should have the same conditions and any costs imposed regardless of the user-user pays principle. Wildlife Queensland strongly suggests that the draft plan be expanded so that the water take by all mining and gas extraction industries are fully accountable. The accumulated impact of mining and drilling activities must be taken into consideration. There should be no impact on existing water rights of pastoral or agricultural enterprises and town requirements. All natural springs relying on the GAB must be fully protected. There must be strong compliance and enforcement programs in place.

It is not only direct use of the water that is a concern. The reinjection of waters and waste by products may have long term impacts in the future and caution needs to be exercised. The question of possible fracturing of geological fault structures from mining and drilling activities that could cause connectivity to the GAB must be addressed.

In Queensland there is no doubt that the Great Artesian Basin Sustainability Initiative (GABSI) program greatly assisted in reducing groundwater extraction and that will benefit the GAB in the long term. The recent Great Artesian Basin and Other Regional Aquifers Water Plan mandating all uncontrolled bores and drains be made watertight by 2027 is to be commended. Such a strategy should be adopted Australia wide where relevant.

Finally until the rolling five-year plan as outlined in the implementation of this draft plan is developed and not only endorsed but implemented by those jointly responsible for the management of the GAB it is not possible to give a comprehensive assessment of this draft strategic plan.

Yours faithfully

Des Boyand, Policies and Campaigns Manager

5th October 2018