

# AFANT



AMATEUR FISHERMEN'S ASSOCIATION OF THE NT INC.

Dr Allan Hawke AC  
The Commissioner  
Hydraulic Fracturing Inquiry  
c/- GPO Box 4204,  
Darwin NT 0801

Dear Dr Hawke

## **RE: Inquiry into Hydraulic Fracturing**

The Amateur Fishermen's Association of the NT (AFANT) would like to submit some comments on the inquiry into hydraulic fracturing in Northern Territory.

AFANT has taken a strong interest into the proposed development of unconventional oil and gas development (hydraulic fracturing) in the Northern Territory. Our interest is to ensure that there is minimal or no impact from the development of this industry on the important recreational fishing industry across the top end and the protection of fish habitat.

We have particular interest in ensuring that the regulation and management of this industry is sufficient to ensure no groundwater contamination, that government has appropriate and sustainable management of water extraction and the protection of the near shore coastal areas from unconventional oil and gas development.

We note international experience where unconventional oil and gas hydraulic fracturing has caused a number of unintended side effects, for example; causing earthquakes, groundwater contamination and flow back chemical or gas escape. AFANT is not in a position to make comment if these issues are through poor operational practice on particular sites or if they indicate a greater unmanageable threat from the practices of hydraulic fracturing.

## **Groundwater protection**

Based on the examples in the USA where contamination has occurred to groundwater systems, AFANT is seeking clear evidence that the industry can develop in the NT without any impact on ground water systems. AFANT believes that greater independent scientific research is required to map all ground waters systems and gain a thorough understanding of the areas proposed for exploration and development and the risks to ground water contamination occurring.

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*Representing recreational fishing in the NT and ensuring the quality of our sport*

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This detailed examination must look at the separation between areas holding water and those structures that are likely to hold oil or gas bearing shale's that are earmarked for exploration and development.

AFANT recommendations:

- Independent research is required to identify ground water systems before development occurs
- improvements are needed to require greater regulatory and reporting arrangements around identification of groundwater systems
- rules requiring maintaining a clear separation between areas that exploration and development occurs and layers that contain ground water

## **Water use**

Another potential impact from the hydraulic fracturing is the high water use and demand by the industry. Many of the areas where oil and gas development are occurring are water poor areas and even relatively low levels of surface water extraction could have a major impact on stream flows.

AFANT believes the current water licensing regime in the NT is totally inadequate to address this new industry and its water use. The mining and oil and gas industry water use must be included in catchment wide water planning arrangements and in declared water control districts under the sustainable yield and water license volumes in approved water plans.

AFANT recommendations:

- water use by the mining and oil and gas industry must be included in the Water Act and managed along with other water uses in the catchment
- In areas of low water availability or areas subject to full allocation, new water use must not impact on existing beneficial users including other water users and the environment

## **Coastal and marine areas**

AFANT believes that the sensitive coastal areas around the Northern Territory should be protected from oil and gas development, particularly unconventional oil and gas areas. AFANT believes areas that should be excluded are all embayments, estuaries or coastal areas out to the 2NM limit.

We have real concerns with the use of seismic air guns and the known impact of this activity on a range of aquatic life. It is clear this impact is unacceptable in the most productive nursery areas which are the near shore environment.

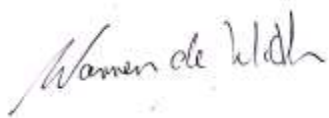
The near shore coastal areas should be completely off limits as any incident spill, uncontained backflow or subsea gas discharge in these areas has the potential to have a much greater impact on a range on Indigenous, recreational and commercial fisheries than any other environment.

AFANT recommendations:

- all near shore coastal areas around the Northern Territory coast should be protected from oil and gas development

I thank you for consideration of this submission.

Yours sincerely

A handwritten signature in black ink that reads "Warren de With". The signature is written in a cursive style with a large initial 'W'.

Warren de With  
President

4 June 2014