Via e-mail to: sreba@nt.gov.au

28 February 2020

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To Whom it May Concern,

FEEDBACK ON THE DRAFT SREBA FRAMEWORK

Thank you for the opportunity to comment on the draft SREBA Framework.

Before giving my feedback please note that I am fundamentally opposed to fracking for on shore gas in any form anywhere in the Territory. Aside from its unacceptable impacts to landscape, culture, ecosystems, water quality and water quantity and the lost opportunities for other more sustainable land activities, I consider the industry is problematic because:

1. It is retrograde to introduce more carbon into the atmosphere when current levels are already too high and introduces unacceptable risks to climate change.

2. In the absence of a price on carbon, which fully passes on the externalised costs of carbon emissions, I see it as incumbent on Government to address the market failure by regulating against carbon extraction, not to enable it.

I believe the recommendations of the Fracking Enquiry already require reconsideration given: the catastrophic 2019-2020 Australian fire season; the drought conditions in the Territory; the stagnation in Australia's emission reductions; and continual improvements in renewable energy technology.

Notwithstanding the above, I agree the SREBA is necessary to more informed decision making and proper regulation and enforcement of the industry. Therefore I consider:

- The SREBA should be comprehensive, fully funded with funding documented upfront, implemented in full, and the information made publicly available.
- The baseline must be established with a high degree of reliability taking into account climate change before any fracking approvals are contemplated.

I believe the information gathered could be of lasting value to understanding the natural resources and social values of the Territory and help to fill other information and regulation gaps (for example the NTG is seeking public input on an offsets policy and this specifically mentions the difficulty in evaluating offsets in the absence of detailed information about environmental condition across the Territory therefore the SREBA framework should be subject to a general scan of natural resources management information needs and that these be included in the SREBA framework.

I provide the following comments of detail on Table 1. Given the size of the document some of my comments may be covered in the text. However, I believe the importance of these issues warrants their being explicitly covered in Table 1.

Domain	Comments
Water quality and quantity	The SREBA should gather information to identify no go zones for water resource quality and quantity protection in the same way as it proposed to do so for aquatic ecosystems. Water quality and quantity no go zones are needed for drinking water supplies, cultural water supplies, high value commercial irrigated water supplies and semi-rural drinking water supplies. The SREBA should gather information to identify no go zones covering groundwater recharge areas and surface catchment areas and not just buffers around wellheads and dams. I consider drinking (and cultural drinking) water supplies are the highest priority for no go zones as the first and most important defence in protecting drinking water assets is to avoid the risk of their contamination in the first place. I consider no go zones around the water assets of the arid zone is especially important given their scarcity. The fresh water resources of the Amadeus Basin are strategic to Alice Spring's future and immense community value is placed upon them. If Government is seen to be not taking every step to protect them then community outrage at a failure of stewardship in my view is entirely appropriate. Monitoring prior to fracking decisions should be for a sufficient period to allow inter annual variability and climate change effects to be observed and understood. I trust that Environmental Health section of the Central Australian Health Service and its equivalents in other regions have been consulted and will be involved design of water quality and quantity monitoring programs for community water supplies.
Aquatic ecosystems	The timeline for monitoring spatial distribution should be sufficient to account for inter-annual variability and not be based on data gathered during droughts or impacted by poor management regimes. The species evaluated should consider local cultural values. There should be prior consultation and involvement of local aboriginal people in surveys.

Domain	Comments
	Cultural monitors should have the opportunity (and be funded) to attend any monitoring activities as a routine requirement.
Terrestrial ecosystems	The timeline should be sufficient to account for inter-annual variability and information should not be based on data gathered during droughts, impacted by poor management regimes or overstocking. The species evaluated should consider local cultural values and historical occurrence of culturally important species. There should be prior consultation and involvement of local aboriginal people in surveys. Cultural monitors should have the opportunity (and be funded) to attend any monitoring activities as a routine requirement.
Greenhouse gas emissions	The baseline assessment should include other greenhouse gases, not just methane.
Human health	I would like to see more information on the arrangements for informed consent and NHMRC ethics approval upfront in the Framework. Mention is made of "regional scale monitoring" how will the impacts on individual communities be monitored?
Social, cultural and economic	The framework should inform no go zones around areas of high cultural value. These could be buffers around sites of cultural significance as well as surface and groundwater catchments where water quality and quantity effect the cultural value and consider ongoing access needs. Surveys/monitoring of overall economic wellbeing should gather sufficient and appropriate information to allow complex consideration and tracking of overall preferences and not just a narrow evaluation of individual livelihoods. This should allow for deliberation and learning in the consideration of the preferences of social groups. This appears to have been successfully captured in the following (Grainger and Stoeckl, 2019): https://www.sciencedirect.com/science/article/pii/S0921800919301855 I strongly consider that consultation should be fully informed and that if individuals and communities are asked to make choices about fracking, then they should have viable alternative pathways to a sustainable livelihood. Consent must never be because of disadvantage which makes the offering up of Country to fracking an option of last resort. I suggest the following pre-conditions should be in place before consultation on fracking ever occurs: • Communities are informed about fracking.

Domain	Comments
	• Communities have access to minimum standards of housing, education, livelihoods and other normal rights. • Communities and individuals have viable choices other than fracking. I believe the SREBA should provide this assurance on the achievement each of these pre-conditions.
New section needed climate change	There should be a separate domain on climate change. Else there should be a "Data Output" within each Domain in Table 1 to report on sensitivities and liabilities resulting from the effects of climate change.

Thank you again for the opportunity to comment. I would be happy to discuss these comments with you and look forward to your response.

Sincerely,

Jacqueline Arnold

REFERENCES

Department of Land Resource Management, Alice Springs Water Allocation Plan 2016-2026, Report No. 01/2016A, p30.

Daniel Grainger, Natalie Stoeckl, The importance of social learning for non-market valuation, Ecological Economics, Volume 164, 2019, 106339, ISSN 0921-8009, https://doi.org/10.1016/j.ecolecon.2019.05.019. (http://www.sciencedirect.com/science/article/pii/S0921800919301855)