

Ms. Miranda Lello
Assistant Director
Department of Environment

Via electronic mail:
Miranda.Lello@environment.gov.au

17 January 2014

Dear Ms. Lello,

Re: Significant Impact Guidelines 1.3: Coal seam gas and large coal mining developments - impacts on water resources

The NSW Irrigators' Council would like to comment on the *Significant Impact Guidelines 1.3: Coal seam gas and large coal mining developments - impacts on water resources* which were released 14 January 2014.

While NSW Irrigators' Council welcomes many of the amendments that were made to the draft Significant Impact Guidelines, we are disappointed that some of our key recommendations have not been included in the final document.

The first key recommendation was to require all large scale mining and coal seam gas operations to submit a water impact referral to the department. Without a mandatory provision for referrals, NSW Irrigators' Council believes that water resources remain at considerable risk of mining and coal seam gas activities.

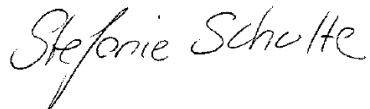
The second key recommendation was to extend the impact criteria so it refers to any changes to the beneficial use characteristics of a water resource as a 'significant impact' and not just hydrology and water quality. We note that the final Significant Impact Guidelines remain limited in this respect and hence are insufficient to comprehensively protect water resources and irrigated agricultural producers.

Finally, we are disappointed that section 5.2.1. does not explicitly list irrigated agriculture as an important water user. The potential impact large scale mining and coal seam gas operations can have on irrigated agriculture is immense and we consider it crucial that the importance of irrigated agriculture as water users are explicitly recognised and acknowledged in the Significant Impact Guidelines.

As such, NSW Irrigators' Council requests that the Significant Impact Guidelines are reviewed after a two year timeframe and further considerations are given to NSW Irrigators' Council recommendations outlined above.

Should you have any comments or wish to discuss any of the above items further, please do not hesitate to contact our office.

Yours sincerely,

A handwritten signature in black ink that reads "Stefanie Schulte". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Stefanie Schulte

Economic Policy Analyst
NSW Irrigators' Council