

19th August 2020

Sarah Harris
Land and Tenures Director

Sent via: Sarah.Harris@Tri-StarGroup.com

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Dear Sarah

RE: Simpson and Pedirka Regions EIR & SEOs

As South Australia's peak environment body, the Conservation Council of SA is an independent, non-political organisation that acts on behalf of its 60 member groups. We have been advocating for a healthier environment for South Australia since 1971.

Please find below our response to your request for feedback on the Simpson and Pedirka Regions EIR & SEOs.

Overall Comments

Your proposal to conduct petroleum exploration activities in the Simpson and Pedirka Regions is completely unconscionable.

It is hard to imagine a more inappropriate area within which to conduct these activities, and the outcome, if successful, will significantly increase the release of greenhouse gas emissions into the atmosphere at a time when the world is fast running out of time to respond to climate change.

This region, encompassing the Goyder Lagoon and the floodplains of the Kallakoopah Creek in the Simpson Desert is unique, breathtaking and spectacular. It is critically important for the range and quality of its biodiversity, providing a vital corridor between a range of regional reserves, public conservation reserves, reserves managed by private conservation groups and spectacular habitat such as the Coongie Lakes.

The values of this region have been recognised for decades, with ongoing and widespread community advocacy for permanent protection. Prior to the 2018 state election, the Marshall Government made a clear, public commitment to "Protect the iconic Kallakoopah Creek wilderness in the Simpson Desert Regional Reserve via a proclamation under the Wilderness Protection Act (1992)".

It is deeply disappointing that TriStar has failed to assess the huge political and social licence risks attached to proceeding with their activities.

Your proposal is vague, lacks essential detail, grossly and inappropriately downplays risks and does not deserve community or regulatory support.

Water

After reviewing your documentation it is unclear what the impact will be on surface water, particularly during periods of flood (the most recent flood in the region was only last year), what activities you will conduct in the Kallakoopah Creek channel, what impact you will have on the Great Artesian Basin and the myriad of mapped and unmapped springs in the region, and how you will deal with waste water.

Biodiversity / Threatened Species

Your description of the prevalence and impact on threatened and other listed species is poor. Comprehensive ecological surveys must be conducted to fully understand the likely impact of these activities on listed threatened species.

The proposed activities have the potential to:

1. alter habitat selection of threatened species,
2. drive increased risk of predation,
3. alter surface water drainage patterns within an important flood zone,
4. deplete groundwater systems,
5. contaminate ground and surface waters through leakages during the drilling or fracking processes, and
6. create additional water sources that could change feeding and migratory patterns of listed migratory bird species.

Risk Assessment

The risk assessment methodology presented in the EIRs is flawed.

The overall risk profile of this project is HIGH.

Climate Change

It is reprehensible that you are seeking to identify and exploit a brand-new fossil fuel play. If we have any chance to keep within the Paris Agreement targets of 1.5 – 2 degree Celsius temperature rise then current known reserves of petroleum, gas and coal will need to be retired, let alone the identification of new, additional areas for production.

It is time to stop. Tristar needs to re-direct its business activities to less greenhouse gas intensive ones.

Consultation

Your consultation process has tried to minimise community reaction and avoid public scrutiny.

There is enormous community opposition to your plans, which will only grow.

We urge you to withdraw your application.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Craig" followed by a stylized flourish.

Craig Wilkins
Chief Executive