880 Coramba Road Dorrigo NSW2453

25th June 2020

## I object to the proposal for because of the following issue’s which have not been adequately addressed.

## 1. This project is the most controversial in the history of the Environmental Planning and Assessment Act 1979. The Environmental Impact Statement attracted 22,721 submissions, of which 98% were objections. The majority (63%) of the 470 submissions from the immediate local area were also objections.

## 2. *Water*

* Santos has used the most basic level of groundwater model because of how little is known about the deep aquifers they will dewater to extract gas.
* Over 20 years, Santos will remove 37.5 billion litres of water from deep below the Pilliga and removing this water will cause depressurisation and loss of water in the Pilliga Sandstone, the southern recharge of the Great Artesian Basin, which outcrops in the Pilliga.
* The model has been described by the Government’s own water agency as having a “**high level of inaccuracy**”**1** and “**not able to provide output at the scale and accuracy to assess the project’s impacts against the minimal impact considerations of the Aquifer Interference Policy**”**2**. The Department of Planning’s Water Expert Panel said it was concerned the model “**may have poor predictive capacity in relation to the impact of production of the surrounding impacted water sources.**”**3**
* The approach taken by the NSW Government and its experts is to grant Santos approval to proceed, and let the company drill 25 more appraisal wells while gathering baseline data to inform a more accurate upgraded model before proceeding to full development.
* There are serious anomalies and unknowns regarding:
  + The degree to which deep aquifer dewatering for coal seam gas will disrupt recharge of the Lower Namoi Alluvium by the Pilliga Sandstone;
  + The presence of faults that might accelerate movement of water or methane;
  + Santos’ ability to obtain licences to account for the water the gasfield will take over decades and centuries into the future since the productive groundwater sources affected are fully allocated and have limited water trading.
* The Department of Planning is downplaying the importance of the Pilliga Sandstone as a recharge aquifer of the Great Artesian Basin and claims that there will be “no significant impact” but in reality, there is not enough information for them to make this claim.

3. The Chief Scientist’s recommendations

* The Government’s failure to implement the 2014 recommendations of the NSW Chief Scientist and Engineer amplifies the risks of this project and means it must be refused.
* A NSW Legislative Council inquiry in February 2020 found that Government had fully implemented **only two of the 16 recommendations** and half had not been implemented at all. 4
* The Chief Scientist recommended enhanced insurance coverage for the coal seam gas industry but this has not been implemented. The parliamentary inquiry described the industry as “**uninsurable.**” The NSW EPA’ says getting insurance is “not straightforward” and “Operators choosing not to hold relevant insurance will be required to instead prove to the EPA the existence of sufficient potential clean up funds.”5 There is no mention of this “requirement” in the Assessment Report or draft consent prepared by the Department.
* The Department’s own Water Expert Panel noted that the Chief Scientist urged that “drilling is allowed only in areas where the geology and hydrogeology can be characterised adequately” but that the Panel is not confident the information provided by Santos meets that threshold.

*4.Waste*

* Treatment of water brought up from underground will produce up to 840,000 tonnes of solid salt waste, laced with heavy metals, which will need to be disposed of.
* Santos and the EPA claim this salt will be non-hazardous, but it will have concentrated elements of whatever heavy metals are in the coal seam water they bring to the surface. Santos will also need to find disposal area for 720,000 cubic metres of coal-based drill cuttings.
* The salt waste will predominately be sodium bicarbonate and its estimated volume has roughly doubled since the first estimates in the EIS, totalling 840,000 tonnes.
* The NSW government’s approach is to approve the gasfield first and trust Santos to prepare a strategy for reuse or disposal of this waste before full development, but as the EPA has pointed out, Councils who run waste disposal facilities do not have to accept Santos’ salt waste

5.Social impacts

* Coal seam gas brings upheaval and division to rural communities. In southern Queensland, a CSIRO survey in 2014 found that only 6% of local people living in gasfield areas thought that the industry has improved their lives. In comparison, 42% said that they were “not coping” or “only just coping” with the changes the industry has made to their lives.6
* Santos’ own assessment found that there would be “almost certain” impacts on housing affordability for Narrabri residents, which will disproportionately affect low-income households and Indigenous people, who are far more likely to be renters.
* During the construction period, the presence of a predominately male non-resident workforce will change the gender balance in the community from roughly equal men and women to 56% men, 44% women. This “masculinisation” has been observed to have negative social consequences in other communities with a fly-in fly-out mining workforce.

6. Aboriginal cultural heritage

* The Pilliga is a hugely significant landscape for Gomeroi people. Santos’ Aboriginal cultural heritage assessment identified 90 known Aboriginal cultural heritage sites in the area, as well as areas of potential cultural heritage sensitivity, which the company has committed to avoiding when it situates its drill pads and infrastructure, but this is based only on already-known areas.
* No detailed new surveying of the area for Aboriginal cultural heritage has taken place yet.
* Santos proposed to undertake detailed surveys after it gets approval and avoid newly found sites of high significance, but this is a highly risky strategy and once granted, the approval will not be able to be revoked.

7. Biodiversity

* The Pilliga is the largest temperate woodland in eastern Australia and Santos proposes to industrialise 95,000 hectares of it, clearing close to a 1,000 hectares in small patches and connecting lines, including removal of several endangered ecological communities.
* Only limited surveys were done for the assessment of the gasfield, but these found 10 threatened plants and 35 threatened animals in the gasfield area, including pygmy possums, koalas and the Pilliga mouse.
* The Pilliga once hosted one of the most important koala populations in New South Wales, but the species in now on an extinction trajectory in the area. With so much habitat and lives lost to recent bushfires, it is crucial to the survival of the koala that its bushland habitats be spared industrialisation.

8.. Economic impacts

* The Department claims Narrabri gasfield will bring “additional supplies” of gas, but the assessment material provided by Santos makes it clear that “ it was assumed that the project did not add to total gas supply at a national level.”7 Furthermore, Santos clarifies, “it was assumed that the project itself did not drive change to gas market prices.”
* Claims of job creation are crucial to the project’s justification, with an anticipated average 190 jobs created locally and 322 in the rest of the state, but this increase comes at other industries’ expense. The economic assessment found that there would be lost employment in agriculture, manufacturing and mining as a result of the project.

9. Fire

* The RFS has repeatedly expressed serious concerns about the operation of a gasfield and its burning flares in a highly flammable landscape like the Pilliga.
* The assessment estimated the likelihood of a loss of containment in the gasfield creating a fire in the Pilliga was once in 70 years. That equates to a 35% chance during the life of the gasfield, or a 1.4% chance that this will happen in any year.8
* From December 2013 to January 2018, at least 17 Pilliga bushfires have been recorded.

10. Chemicals and spills

* The National Industrial Chemicals Notification and Assessment Scheme (NICNAS) conducted a National assessment of chemicals associated with coal seam gas extraction in Australia found that 48 of 113 chemicals used in coal seam gas operations could harm the health of workers in the CSG industry that come into contact with harmful quantifies of them in mixing or blending chemicals to produce formulations, or in the event of an industrial accident.
* They found that 11 of 21 chemicals used for drilling were of a potential concern for public health following a bulk spill during transport.

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