To The Independent Planning Commission 19th July 2020

This is a submission on the Narrabri Gas Project.

I am a 67 year old resident of the Blue Mountains, married with children and grandchildren. I have family history in the Narrabri region and have spent time holidaying in the Pilliga Forest area because of its natural beauty and accessibility.

I object to the proposed Narrabri Gas Project (NGP) due to its significant environmental, heritage, social and economic impacts.

1. NSW does not need more gas resources which fuel dangerous climate change. Especially now the NSW government has approved a plan to nearly double the capacity of the Port Kembla gas terminal. This project could easily access cheap international gas prices and price Narrabri out of the market. Furthermore, an October 2019 report from Pegasus Economics states solar and wind is developing faster than expected, reducing in cost and already displacing the need for gas-fired electricity. Santos claims the gasfield is needed to “increase supplies” of gas, but there is a glut of exported gas from Queensland and ships of Australian gas are sitting idle unwanted. (See Toscano, Nick “Australia's LNG tankers sitting idle as global supply glut, COVID start to bite.” 17 June 2020. Sydney Morning Herald. <https://amp.smh.com.au/business/the-economy.>
2. I support developments that have unarguable benefits for communities and society as a whole and guaranteed safety and protection of natural resources. I do not believe the NGP meets these criteria. Even if the NGP was viable (which is highly contentious as outlined above) **the project endangers the water table** and has already affected the local farming community which is absolutely dependent on clean water table. Over 20 years, Santos would remove 37.5 billion litres of water from deep below the Pilliga and treat it in the Leewood treatment facility. There is still no plan to safely and responsibly dispose of an estimated 840,000 tonnes of salt waste (laced with heavy metals) from the project which is set to be 117 tonnes every day during peak production.

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. Santos has used the most basic level of groundwater model because of how little is known about the deep aquifers they will de-water to extract gas.

Santos itself anticipates leakage from the precious alluvium that lies above the coal seams despite claiming there is no linkage between the water sources. So it is totally justifiable that landholders that rely on the GAB, the Gunnedah Oxley Basin and other groundwater in the area are strongly opposed to the project.

 Australia is the driest inhabited continent on earth and **we can not afford to gamble with our water**. The claim from the Assessment Report and recent CSIRO report are based that the project would not adversely affect groundwater, however the studies are inadequate to thoroughly confirm there would be no adverse risk to groundwater. Coal Seam Gas drilling is simply not worth the risk.

1. I am deeply concerned about the world my children and grandchildren will be living in especially in relation to greenhouse gases and climate change.

Total greenhouse gas emissions produced by the project could be 127.8 million tonnes of carbon dioxide equivalent, or 5 million tonnes a year. Just one gasfield would increase Australia's greenhouse gas emissions by nearly 1% per year!

This would compromise Australias commitments under the Paris Climate Agreement.

Mobilising methane in coal seams could lock in ongoing leaked emissions of this potent greenhouse gas for decades to come. Globally, the UN Environment Programs Production Gap Report in 2019 found that “With average lifetimes of 20 years or longer for pipelines, terminals, wells, and platforms, the time to begin planning for a wind-down of gas production is, as with other fossil fuels, already upon us.” Their report found that to achieve the Paris Climate Agreement goal of keeping average global warming well below 2 degrees, global gas production needs to peak by 2030 and decline after that. To meet the safer 1.5 degrees warming limit, gas production needs to peak this year.

1. Coal seam gas brings upheaval and division to rural communities. A CSIRO survey of community wellbeing in 2014 found that only 6% of local people living in Queensland gasfield areas thought the industry had improved their lives while 42% said that they were “not coping” or “only just coping”(Walton, A., McCrea, R. and Leonard, R. (2014). )

I have spent time in the area as an adult and earlier as a child and I have seen that the community is largely supported by farming, light industry and tourism. Many farmers are justifiably opposed to the NGP and feel their rights and concerns are overridden by interests that want to impose an unnecessary and destructive project on their land. 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.

Claims of job creation are crucial to the projects justification, with an anticipated average 190 jobs created locally and 322 in the rest of the state, but this comes at other industries expense. Santos’ own assessment admits there would be lost employment in agriculture and manufacturing as a result of the project, despite unsubstantiated claims of flow on jobs in NSW.

I reject the argument that the majority of social impacts would be mitigated through the use of the Gas Community Benefit Fund, the use of the Community Consultative Committee and a range of Landholder Compensation agreements because many of the negative impacts of the project are ignored.

Other grounds for objection :

Aboriginal heritage is not adequately assessed and consent has not been obtained.

Potential to impact threatened fauna through direct habitat clearance, habitat fragmentation, vehicle strike and predation by pest species.

The Pilliga is the largest temperate woodland in eastern Australia and CSG will industrialise 95,000 hectares of it, clearing nearly 1,000 hectares in small patches for well-pads, infrastructure and gaslines, including removal of several endangered ecological communities. Only limited surveys were actually undertaken as part of the assessment of the gasfield, but these found 10 threatened plants and 35 threatened fauna 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 is now on an extinction trajectory in the area. With so much habitat and lives lost to recent bushfires, it is crucial for the survival of the koala that its bushland habitats be spared industrialisation.

Yours Sincerely

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You may include my name and submission on your website.