

28th July, 2020

**From: The Charlestown Wilderness Society Group**

To: The Independent Planning Commission - Narrabri Gas Project

Dear Independent Planning Commission,

We are writing to object to the Narrabri Gas Project and implore you to weight appropriately the overwhelming opposition to this project. It must not be approved and you are in a position to stop the project.

We are writing on behalf of our local community group, the Charlestown Wilderness Society. We are a group of concerned citizens in Newcastle and Lake Macquarie who care deeply about protecting nature and the environment. We do not support coal seam gas mining in Narrabri, and the Pilliga should be saved from this invasive and unnecessary fossil fuel extraction project. Below we have a number of arguments to present for your consideration.

Firstly, we recognise and pay respect to the Gomeroi peoples, the Traditional Custodians of the land impacted by the proposed Narrabri gas project. The cultural importance of the Pilliga in this context is immeasurable. Any so-called economic benefits or resource industry claims do not outweigh the significance of the cultural heritage of the land and people of the Gomeroi nation. The approach taken by the proponent Santos to site its facilities with the intention of avoiding “areas of high cultural heritage value to local Aboriginal groups” fails to understand the landscape scale connection to Country and the holistic responsibility as protectors of Country that is intrinsic to Gomeroi culture.

Secondly, we have deep concerns for the singular focus on the economy in the politicking around CSG mining in Narrabri, and indeed for the state and country as a whole. This project is forest and climate-destroying and the gas is not needed. If the economic modelling was to truly take into account the environmental destruction, all resemblance of viability becomes untenable. The so-called economic viability of the project is at best questionable and at worst misleading.

The economics do not add up, where the gas prices in Australia are pegged to a so-called competitive fixed rate for an international market, that does not guarantee a return on costly investment. We should not be beholden to an international market price far higher than it should cost for us domestically, let alone in an industry that is fast becoming outdated compared with advances in renewable technologies. The commission should consider the very limited market place at play here, with only four main companies in the gas market.

The Department’s Assessment Report states the project would “put downward pressure on gas prices.” However the Institute for Energy Economic and Financial Analysis (IEEFA) states production costs at the Narrabri Gas Project are some of the highest in the country, with estimates to supply major domestic markets as high as $9-10/GJ. Currently in Australia customers seeking long term contracts are paying between $9-12/GJ to secure gas, leaving little room for profit generation. The project will clearly be at a globally uncompetitive price for gas.

We ask who the gas agenda really benefits? Santo’s coal seam gas project should not go ahead. We want to support the broad community objection to the project and we want to see the Pilliga saved.

The so-called economic viability of the project also ignores the compelling need to move towards renewable energy economics. Climate change is the biggest threat here and we have to understand that the way out of this mess is to invest now in a renewables transition. Clean energy is an opportunity and a necessity. For the state government, or any government to continue to ignore the opportunities in favour of outdated and harmful fossil fuel projects is unacceptable. We are in a compelling position both in terms of a post covid recovery and in terms of technological advances to take advantage of clean energy options. If we were able to counter the Pilliga gas project with a more effective, sensible and renewable energy-based project, we would be left with positives, a better way out of our climate change mess, not another project that leaves us with more environmental destruction and global warming emissions yet again.

Thirdly we are deeply concerned about the damaging environmental effects of coal gas seam gas mining in the Pilliga. The damaging effects on the unique and precious native species in the Pilliga, like (but not limited to) the endemic Pilliga Mouse, the Glossy Black Cockatoo, koalas and the very important frogs living in the forest. The proposal to clear nearly 1,000ha of the Pilliga will cause significant fragmentation within the forest. The Assessment Report fundamentally fails to acknowledge the significant impact to species habitat from fragmentation. You will have received numerous and informed submissions asking for consideration on the effects the gas mining will have on the animals and plants of the Pilliga forest, and the farming lands in the area, and we implore you to weigh them appropriately. We would like the Commission to note our concerns too on these matters.

Finally, we would like to finish our submission to your inquiry with our hopes for your consideration. Please do not approve the coal seam gas mining in the Pilliga, and instead make a sound decision which supports actual energy security, namely renewables. The CSG mining in the Pilliga is not going to increase energy security in Australia as some say. Instead, it continues to contribute to an energy industry contributing to climate change. Renewables are the secure option and renewable energy is what will securitise our energy market.

We are committed to stopping CSG in the Pilliga. We hope that you can see that there are too many sound arguments against the project and that it should not go ahead. Your commission is in the most important position to independently see what is essentially a political agenda to constitute fossil fuel extraction. We ask that you give due weight to the very real concerns we have listed above like so many others and say no to this project.

We, of course, would like to thank you for your consideration and the important work you do.

Kind regards,

Charlestown Wilderness Society