

Knitting Nannas New England North West (KNNENW) form one of over 40 local groups of Knitting Nannas bringing attention to invasive and destructive mining to save our land and water for future generations.

Our group started at a camp in the Billiga Forest around September 2013.

Currently we have 90 members on our mailing list and 1,327 followers on FaceBook which would correspond to over 2,500 members and 37,000 followers in Sydney, respectively.

There are numerous fundamental problems with the Narrabri Gas Project in general and the report of the NSW Department of Planning, Industry and Environment in particular.

I will focus on Section 6.6 Greenhouse Gas Emissions and Climate Change. The summary states *the project has the potential to assist in reducing NSW's greenhouse gas emissions intensity, and be a key component of NSW's future energy supply mix.*

The Department bases this assessment on the following claims:

1. ... *fugitive methane emissions from gas production in Queensland are lower than previously thought, at less than 0.5% of coal seam gas production.*

The Department failed to include references to support this claim and the only relevant and compatible one I could find is a CSIRO case study which states

*Although this is a very low figure, it's important to note that this is only a pilot study, encompassing less than one per cent of the existing CSG wells in Australia. Another important consideration is that emissions were only measured from well pads, so cannot give a full representation of the whole-of-life emissions. [1]*

2. ... *on a life cycle basis, domestic coal seam gas produced electricity would produce up to 50% less carbon emissions compared to coal fired electricity production.*

The Department attributes this claim to the CSIRO but it comes from GISERA, an alliance of the CSIRO with five of the largest coal seam gas companies operating in Australia, including Santos. The Institute for Energy Economics and Financial Analysis stated in March this year

*GISERA's claim of 50% less emissions from gas is at best dishonest and designed to mislead and deceive the public, investors and gas consumers. [2]*

Thus it is no surprise that the independent NGO Doctors for the Environment Australia arrived at the opposite conclusion on the basis of a comprehensive review of the available scientific and technical literature commenced in 2013:

*In 2019, there are many reasons to be seriously concerned about the climate change implications of continued reliance on and expansion of gas production for energy purposes. Unfortunately, early claims that using unconventional gas for energy will have positive impacts on greenhouse gas emissions are no longer justified. [3]*

3. *Total project-related Scope 1 to 3 emissions would also be low relative to Australian emissions, at approximately 0.9% of the nation's total emissions.*

The first problem with this claim is that it rests on the assessment provided by Santos and GHD which fails to take into account migratory emissions as well as those from accidents and those occurring after the project's conclusion.

Secondly, it fails to mention Santos' ambitions to extend the Narrabri Gas Project into six additional basins stretching from the Queensland border to the upper Hunter Valley, as declared to shareholders at a seminar in November 2014 (and shown in the figure below).

Finally, we must ensure that total national emissions stay within the budget to keep warming below 1.5 or 2° C. Even emissions which are low relative to current total national emissions can cause total national emissions to exceed this budget. Science tells us that we must avoid this to maintain a liveable environment for future generations.

In conclusion, the Department’s report fails to provide an independent critical analysis of the Project’s impacts on Greenhouse Gas Emissions and Climate Change. Due to these impacts alone and contrary to the Department’s assessment, the project is neither in the public interest nor is it approvable.

On behalf of the Knitting Nannas New England North West and in solidarity with the Aboriginal Custodians, the Gomeroi People, and with farmers and communities across the North West, I call on you to reject the Department’s recommendation to approve the Project.

- [1] CSIRO Case Study: *Fugitive emissions from coal seam gas*, last updated 21st October 2019 <https://www.csiro.au/en/Research/EF/Areas/Oil-and-gas/Onshore-gas/Coal-seam-gas-fugitives>
- [2] *Is the Gas Industry Facing Its Volkswagen Moment? Gas Is More Emissions Intensive Than the Gas Industry’s Marketing Arm Suggests*, Institute for Energy Economics and Financial Analysis, March 2020, [https://ieefa.org/wp-content/uploads/2020/03/Is-the-Gas-Industry-Facing-its-Volkswagen-Moment\\_March-2020.pdf](https://ieefa.org/wp-content/uploads/2020/03/Is-the-Gas-Industry-Facing-its-Volkswagen-Moment_March-2020.pdf)
- [3] *Onshore Oil and Gas Policy Background Paper 2019*, Doctors for the Environment Australia, <https://www.dea.org.au/wp-content/uploads/2018/12/DEA-Oil-and-Gas-final-28-11-18.pdf>

**Acreage with potential to underpin NSW Energy Supply**

Santos acreage covers seven sub-basins across the Gunnedah Basin

