**Narrabri Gas Project Submission**

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**Introduction**

Dear Commissioner

I am writing this submission as a concerned citizen and as a member of an environmental organisation (The Wilderness Society) which has been extremely active in its campaigning surrounding the present gas project proposed by Santos.

As the members of the panel will be aware, coal seam gas (CSG) production has become an intensely controversial subject both internationally and domestically. Headlines abound regarding public frustration and outcry, disruption of hydrological functions, and geological destabilisation, all as a result of CSG extraction and production. Despite the controversy, Santos is now aiming to establish up to 850 gas wells throughout the Narrabri/Pilliga region.[[1]](#footnote-1) With this assessment process, however, we have been gifted with an opportunity to stop the headlines before they are written.

To demonstrate the need for such precaution, I will draw on two broad areas of concern: the inadequate environmental assessment in the proponent’s EIS; and the non-existent social license of the Narrabri Gas Project.

**Environmental Assessment in Santos’ EIS**

To begin, as noted by the IESC in its appraisal of the EIS, there exist significant knowledge gaps regarding the hydrological implications of the project, gaps which have been inadequately addressed by the proponent.[[2]](#footnote-2) First, the plan for the management and storage of produced water from CSG extraction is highly questionable[[3]](#footnote-3) Here, the EISC has identified discharge of ammonia-tainted water as a particularly pressing, yet unanswered, concern.[[4]](#footnote-4) Further, data regarding the effects of such discharge on biota is limited to mammals and birds, an oversight which betrays a misunderstanding of the networked nature of ecosystems.[[5]](#footnote-5) Second, given the noted impacts of CSG extraction on groundwater reserves, it should be assumed that comprehensive groundwater monitoring systems would be in place and the local impacts well-understood; however, this is not the case.[[6]](#footnote-6) Notably, the proponent’s assessment of groundwater dependent ecosystems in the region is incredibly lacklustre, gathering little field data on potential ecosystems of this sort and assigning them low ecological values despite this lack of data.[[7]](#footnote-7)

There is also reason to be weary of the role this project may play in exacerbating existing trends of climate change. It is increasingly well documented the relationship between CSG production and methane emissions through both burning and supply chain leakage.[[8]](#footnote-8) Indeed, prior to the marked increase in natural gas production in this new millennium, atmospheric methane was plateauing, whereas now we observe, once again, a sharp rise.[[9]](#footnote-9) In the short-term, this increasing concentration of atmospheric methane is incredibly troubling. As a greenhouse gas, methane is 86 times more potent than CO2 over a 20-year period, and around 30 times more potent over a 100-year timeline.[[10]](#footnote-10) Unfortunately, however, the proponent has done little to assuage these concerns, choosing instead to deny their legitimacy. Here, we can point to two key claims in the EIS intended to downplay the climatic significance of the project. Firstly, it is argued that the emissions of the project are low relative to Australia’s total emissions, implying that action against the project in the name of climate mitigation is unnecessary.[[11]](#footnote-11) Such an argument ignores the acknowledged need for small mitigatory steps in fighting climate change and has been deemed irrelevant in several recent cases, most salient of which being the Bylong Coal Project determination in which the IPC dismissed a similar appeal to scale.[[12]](#footnote-12) Secondly, the proponent claims that natural gas is valuable as a climate mitigation option due to its low relative greenhouse gas intensity.[[13]](#footnote-13) Indeed, the proponent touts CSG as a low-carbon energy source which is key to the realisation of ecologically sustainable development.[[14]](#footnote-14) While these arguments are not without merit – CSG is certainly low-carbon compared to coal production and consumption – the proponent downplays their responsibility for downstream emissions and overlooks the potential scale of fugitive emissions.[[15]](#footnote-15) If these sources of methane are taken into account, the climatic benefits of CSG as compared to coal production may be negated.[[16]](#footnote-16)

We can see, then, that there is a distinct lack of scientific certainty regarding major components of the proposal, with the proponent likely underestimating the breadth and severity of the project’s potential impacts.

**Social License**

The community in Northwest NSW has responded to these uncertainties with widespread anxiety. Indeed, of the 23,000 submissions submitted during the assessment of the project, 98% opposed Santos’ plans.[[17]](#footnote-17) Unfortunately, however, opportunities for genuine public participation have been scarce, with key information being suppressed and Santos’ plans for water management left largely undescribed.[[18]](#footnote-18) While the public hearing and current submission process are promising moves, it remains the case that community fears regarding impacts on groundwater and local flora and fauna have not been addressed by the proponent.

Santos has aimed to dispel these community worries by pointing to the economic benefits of the project, promising 1300 jobs and $1.2bn in royalties among a slew of other claims.[[19]](#footnote-19) Yet, the economic virtues of gas extraction are less clear than Santos would suggest. Indeed, there is good reason to believe that CSG production is swiftly becoming an economic burden rather than a benefit. Santos’ recent business decisions are evidence of this, withdrawing from its proposed projects in the Northern Territory, delaying its Barossa field project for the foreseeable future, and reducing its capital expenditure by 38% for 2020.[[20]](#footnote-20) Further, since 2014, Santos has been forced to write off close to $7bn relating to its CSG operations.[[21]](#footnote-21) Would it really be in the Government’s best interests to invest in an industry which shows such visible signs of downturn? More importantly, would it really be good for the community to have a large scale, environmentally risky remnant of a waning industry in the local area? To these questions, I would answer “no”.

**Conclusion**

At this stage, with the failure of Santos to provide adequate management plans, the overwhelming community opposition, and the questionable economic basis, approval of the Narrabri Gas Project would be unwise. This project has already generated headlines regarding its assessment process, let’s not allow any to be written about its impacts.

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