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Independent Planning Commission
Panel for the Narrabri Gas Project
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Submission objecting to the Narrabri Gas Project

Dear Commissioners,

I submit the following information in support of my view that the NARRABRI GAS PROJECT should be rejected.

This information is from the Sydney Environment Institute at Sydney University.

Opinion

What's at Stake in Approving the Narrabri Gas Project?

Following on from an expert report submitted to the IPC last month, SEI researchers explore the social, economic and environmental risks posed by the Santos Narrabri Gas Project.



Bibblewindi wastewater ponds, Narrabri. Image courtesy of Jonathan Moylan.

By Dr. Rebecca Lawrence, The Sydney Environment Institute; Professor Susan Park, Department of International Relations; Dr. Madeline Taylor, Sydney Law School; The University of Sydney

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In July, the Independent Planning Commission of New South Wales held [public hearings](#) into Santos' \$3.6 billion prospective coal seam gas project covering approximately 98,000 hectares, 20 kilometres south-west of Narrabri. Known as the Narrabri Gas Project (NGP), 60% of the project is located in the Pilliga forest, [the largest forest and woodlands in western New South Wales](#) that is home to a number of threatened species including the koala, while [40%](#) of the project is adjacent to prime local farmland that is part of Australia's food bowl. It is also located on the traditional lands of the Gomeroi people. The project seeks to provide unconventional gas to Australia to secure our energy needs. If approved, it would be one of Australia's [largest emitters of greenhouse gas](#).

The project is highly controversial, attracting [23,000 submissions](#), 98% of which oppose the project at a national scale, with local communities overwhelmingly opposing the project.¹ A multidisciplinary team at the Sydney Environment Institute along with commercial energy industry and civil society experts, provided a [submission](#) to the IPC demonstrating key flaws in evidence basis used by the NSW Department of Planning, Industry and Environment's (DPIE) recommendation to approve the project.

The basis of our submission is that any determination by the IPC should necessarily be informed by adequate evidence and take a risk-based approach to prevent significant potential impacts to the region in determining whether the Narrabri Gas Project is in the public interest.

Our submission analyses three central claims made DPIE's Narrabri Assessment Report:

- That the Narrabri Gas Project will not contribute to gas security for New South Wales.
- That the project is highly likely to have significant impacts on the region's significant water resources, including the Great Artesian Basin, the biodiversity and heritage values of the Pilliga State Forest, and the health and safety of the local community; and
- The Narrabri Gas Project will result in a significant impact on people and the environment.

Our submission interrogates the evidence provided by DPIE in its Assessment Report providing the basis for the recommended approval of the project. In particular, we document flaws in DPIE's assessment process for providing robust evidence supporting its findings that the NGP will contribute to gas security for New South Wales, that it will not have significant environmental impacts, and that it will not result in a significant impact on people.

The first flaw is DPIE's argument that the Narrabri Gas Project is in the public interest on the basis that it will contribute to gas security for New South Wales. DPIE relies on the proposed unconventional gas development proponent Santos 'providing all the gas from the Narrabri Gas Project to the domestic market and agreed to accept a condition to this effect on any petroleum production lease granted for the project under the *Petroleum (Onshore) Act 1991*.'. However, this statement refers to gas being reserved for the Eastern Gas Market as a whole. This indicates the

proponent will not be committing its gas solely to NSW in the first instance. Moreover, the DPIE Recommended [Conditions for Approval to the IPC](#) make no mention whatsoever of Santos' commitment to the domestic gas market or recommend a condition to legally compel Santos to reserve gas domestically if the project is approved. DPIE cannot rely on the NGP providing increased domestic gas supply as the proponent has no corporate or financial motivation to do so, and there is no legally binding agreement currently in place requiring it.

The second flaw is that the assessment does not provide critical evidence that the NGP will not result in significant risk to high-quality groundwater resources in a region and ecosystem highly dependent on them. The NGP involves extensive drilling below the Great Artesian Basin, including within a groundwater recharge zone for the Pilliga Sandstone, creating a major risk of groundwater, land, and surface water contamination. Despite Santos and the DPIE assumptions that risks will be minimal, new research demonstrates how methane contamination of groundwater occurs due to changes in pressures during water and gas extraction.² This creates health and safety risks and compromises water quality. Wastewater has already leaked in the proposed project area during pilot exploration and production activities, which is of significant concern and demonstrates the high risks of the proposed project.

DPIE's assessment is not robust in relation to threats to the water table and management of waste brine, and its approval of adaptive management approach is insufficient to address significant potential impacts that are highly complex and therefore likely impossible to mitigate.

The third flaw is that DPIE's assessment does not provide robust evidence that it will not result in a significant impact on people and the environment. Specifically, DPIE's assessment report relies almost exclusively on a review by Professor Deanna Kemp of Santos' own Social Impact Assessment and takes the view that Professor Kemp's review constitutes support of the project. Our concern is that Professor Kemp has not actually undertaken a comprehensive assessment of the social impact merits of the case, nor was she commissioned to do so. In our submission, we reference correspondence between Dr. Lawrence at University of Sydney (co-author to our submission) with Professor Kemp. We detail Professor Kemp's concerns that the Department has "misconstrued" her advice to the Department, and misinterpreted it as giving the project a "green light", when Professor Kemp has stated that her advice in no way constitutes recommending an approval of the project. There is sufficient evidence outlined in our submission, where we rely on [evidence provided by Gemma Viney and Dr Alison Ziller](#), to suggest that the social impacts in the short and long term will be unmanageable. Such impacts specifically pertain to social conflicts over the proposed gas project, loss of rural livelihoods, impacts on Aboriginal people, and the impacts on the Narrabri community as an already socially disadvantaged and vulnerable community.

With the hearings now complete, the IPC must consider community opposition and the evidence mounted by interest groups as to whether to approve the Narrabri Gas Project. Our submission highlights the failure of DPIE to provide robust evidence that the coal seam gas project will provide the benefits DPIE says it does compared with significant economic, environmental, and social costs.

References

1. Ziller, A., and G. Viney, 2020, *Social Impacts Review Report: Narrabri Gas Project*, p. 14.
2. Iverach et al., 'Constraining source attribution of methane in an alluvial aquifer with multiple recharge pathways', *Science of the Total Environment*, (2020).

This project is being led by Michelle St Anne, Deputy Director and Operations Manager – Programming, Impact and Engagement at the Sydney Environment Institute.

[Rebecca Lawrence](#) is a Senior Research Fellow at the Sydney Environment Institute. Rebecca joins the institute in 2020 after her time at the [Department of Political Science, Stockholm University](#) as Research Fellow. She is Chief Investigator for a major research project funded by the [Swedish Research Council](#) for Sustainable Development on the impacts of mining on local and Indigenous communities in Sweden, Norway, Finland and Australia. Rebecca is the Research Lead on [Resource Legacies and Impacted Communities](#).

[Susan Park](#) is Professor of Global Governance at the University of Sydney. She focuses on how state and non-state actors use formal and informal influence to make the Multilateral Development Banks (MDBs) greener and more accountable. She is a Senior Research Fellow of the ESG, an affiliated Faculty member of the Munk School's Environmental Governance Lab at the University of Toronto, an External Associate of the Centre for the Study of Globalisation and Regionalisation at Warwick University, and a research affiliate of the Sydney Environment Institute at the University of Sydney. Susan is the Research Lead on [The Global Shift to Renewables](#) and [Environmental Disasters and Just Governance](#).

[Madeline Taylor](#) specialises in Energy and Natural Resources Law and specifically on the intersection between unconventional gas regulation, energy policy, and landholder rights. In particular, her research advances a novel examination of transitioning energy regulation from a comparative and socio-legal perspective, including the strategic governance of energy and the fragmentation of ownership rights between the state, corporations and landholders. Her recent book entitled, [Agricultural Land Use and Natural Gas Extraction Conflicts: A Global Socio-Legal Perspective](#), examines the socio-regulatory dimensions of coexistence between agricultural and onshore unconventional gas land uses in the jurisdictions with the highest concentration of proven unconventional gas reserves.

I ask that you reject this project.

Kind regards

Alastair Kennedy