

Narrabri Gas Submission to the NSW Independent Planning Commission

I object to the Narrabri Gas Project because I believe the close relationship between Santos and the NSW Government will hinder the ability of the government to regulate, monitor and enforce compliance.

The NSW Government's Narrabri Gas Project Assessment Report says "with suitable controls, the Narrabri Gas Project is **unlikely** to harm the environment or adversely affect the health and safety of the local community."

This depends upon

1. The relationship between Santos and the NSW and Federal Governments
2. Santos' trustworthiness and the ability of its employees to follow the correct procedures
3. NSW government's ability to regulate, monitor and enforce compliance

What is the relationship between Santos and the NSW and Federal Governments?

- The National Party and some members of the Liberal Party have been pushing for this project's approval since they won government in 2011.
- Santos and the Minerals Council have had easy access to politicians unlike the project's opposition.
- Ex Santos and other gas executives work for the Federal Government, are on boards of government institutions and head the Covid-19 recovery commission.

Should the community trust Santos?

The company has

- donated nearly \$150,000 to political parties 2018/19
- paid no corporate tax in 2018/19
- paid no royalties on the gas it uses in the Wilga Park Power Station due to a royalty deduction scheme
- applied pressure on the NSW government to fast track the approval process, while at the same time, refused to provide requested data. www.smh.com.au/politics/nsw/i-won-t-be-pushed-around-resources-minister-warns-santos-over-gas-20190624-p520r2.html
- misled the public and the government by claiming east coast gas supplies were running out when Australia was soon to become the largest exporter of gas in the world
- syphoned off gas, usually used domestically, for its hungry LNG export plants, resulting in high domestic gas prices and business closures
- objected to a domestic reservation policy which would have kept prices lower
- not provided accurate up to date information on the impacts of the project
- will not disclose a proven disposal method for salt waste
- claimed to but never reported a leak or spill before the public did
- claimed but have not established a good relationship with the local and broader community over eight years

- claimed but not provided extensive community engagement to keep the community informed
- claimed but not provided environmental monitoring data to the public. A report by a parliamentary inquiry into the implementation of the recommendations contained in the NSW Chief Scientist's Independent Review of Coal Seam Gas Activities in NSW was published in February 2020. It found Santos and the Australian Petroleum Production and Exploration Association agreed that Recommendation 10 had been fully implemented with the establishment of SEED (Sharing and Enabling Environmental Data) portal in 2017. Based on the evidence received at the inquiry, the committee found this recommendation partially complete. Industry data was not included and community access to data was limited. <https://www.parliament.nsw.gov.au/lcdocs/inquiries/2557/Final%20Report%20-%20Implementation%20of%20the%20recommendations%20of%20the%20NSW%20Chief%20Scientist%20on%20CSG%20activities%20-%2027%20February%202020.pdf>

Can the government regulate, monitor and enforce compliance?

The NSW government has

- accepted donations from Santos and from the gas industry
- not acted quickly on spills reported by the public
- ignored the latest findings on methane emissions from gas fields
- ignored the latest health warnings on domestic gas
- claimed to have the best regulations for coal seam gas in the world, but they are useless unless companies comply and are independently monitored and enforced. EPA's gas regulation budget for 2019/20 was \$3.75 million. Who will pay these costs?
- banned evaporation ponds but water has been left in the ponds at Leewood to evaporate
- banned the use of BTEX (benzene, toluene, ethylbenzene and xylene) chemicals but these chemicals are found naturally in the coal seam and are brought to the surface in wastewater
- failed in their attempts at community consultation as seen by the numbers of people in the region objecting to the project. The seat of Barwon was lost to the National Party at the last election because of this government's policies on gas and water.
- failed to provide the community with access to monitoring data collected by the government and Santos as recommended by the Chief Scientist.
- failed to instil community confidence in the Environment Protection Authority (EPA), the lead regulator for all coal seam gas development in NSW, responsible for monitoring and enforcing compliance with any conditions of approval.
- failed to assure landholders in North West NSW that they will be adequately recompensed for damage from CSG. Australia's largest insurance company says it will no longer cover farmers for public liability if they have coal seam gas (CSG) infrastructure on their property. Landholders fear insurance companies will not cover them for public liability, environmental damage in relation to food production and quality, and that future bank loans will be denied or existing loans called in due to an inability to secure adequate insurance. <https://>

www.abc.net.au/news/2020-06-10/coal-seam-gas-farmers-queensland-insurance-pull-out-iag/12337156

- Failed to implement the Chief Scientist's Recommendation 9 'that Government consider a robust and comprehensive policy of appropriate insurance and environmental risk coverage of the CSG industry to ensure financial protection short and long term. Government should examine the potential adoption of a three-layered policy of security deposits, enhanced insurance coverage, and an environmental rehabilitation fund.' This now appears to not be impossible.
<https://www.parliament.nsw.gov.au/lcdocs/inquiries/2557/Final%20Report%20-%20Implementation%20of%20the%20recommendations%20of%20the%20NSW%20Chief%20Scientist%20on%20CSG%20activities%20-%2027%20February%202020.pdf>

Name
Date