

“Balarinji”

156 Strang Road

Tambar Springs NSW 2381

10TH August 2020

Office of the Independent Planning Commission NSW

Level 3, 201 Elizabeth Street

SYDNEY NSW 2000

Submission to the Independent Planning Commission Objecting to the Narrabri Gas Project (NGP)

Dear Commissioners,

Thank you for the opportunity to object to this proposed NGP. Our farming property has been home to our family for 97 years located on the beautiful Liverpool Plains 60kms South West of Gunnedah, in the proposed Bando Gasfield should this uninvited proposal be approved. It defies gravity that this project has even progressed to this point when there is no need or social license. Gas is a dinosaur industry and Santos are flogging a dead horse at not just to our personal expense now but for generations and generations of Australians to come.

Farmers in the North West of New South Wales have endured many droughts, floods, fires and pest plaques. This resiliency is due to constant assessment of current and future risks, and community members supporting one another. For over ten years we have researched this horrible threat of Coal Seam Gas (CSG) on our productive food bowl of the nation and not once have we been convinced that Santos has acted in any ones interest but for their own. We certainly know when a proponent is trying to pull the wool over our eyes.

We totally disagree with aspects of the NSW Department of Planning, Industry and Environment (DPIE) Final Assessment Report on the NGP quoted by Santos’ Activities Update August 2020 Narrabri Gas Project (PEL 238), as highlighted below:

1. It is critical for energy security and reliability:

Energy analysts have questioned the feasibility of the NGP, due to estimated extraction cost coupled with the global oversupply of gas pushing prices increasingly lower. Gas reached its peak usage in 2012, with the reported gas use in our national electricity market over the past 5 years being down 60 per cent, demonstrating a decreased in demand due to attractiveness of the renewable energy sources.

2. Delivers significant economic benefits to NSW and the Narrabri region or stimulate economic recovery from the effects of COVID-19:

Proponents overstate their value to the economy and employment, with the significant local 'economic benefits', such as employment, only occurring in the construction phase of a gas project as demonstrated in Chinchilla, Queensland. In fact, it creates a "boom and bust" market, by inflating property values and pricing locals out of the market and subsequently after the construction phase, the value of these homes have substantially decreased, effectively creating an unstable housing market for the local community.

This is only a 20 year project versus the sustainability of the agricultural industry, which has been supporting the local Gunnedah community for over a hundred years. This is not only demonstrated through the regions impact on the national economy, with Gunnedah shire's total value of agricultural output in 2015/16 being \$182 million, but its contribution to the local economy. We cannot tell you the amount of times a local business has said to us "If it wasn't for the farmers in the district, we would not have a business".

3. Has been designed to minimize any impacts on the regions significant water resources, including the Great Artesian Basin (GAB), the biodiversity and heritage values of the Pilliga Forest, and health and Safety of the local community; and would not result in ANY Significant impacts on people or the environment:

This is interesting when The Environmental Impact Statement (EIS) attracted 22,721 submissions, of which 98% were objections to the project.

This was further demonstrated during the IPC hearings, with NGP rightfully attracting strong objections from a diverse group of people, from locals, to farmers, to environmental specialists, to mayors locally and regionally, all voicing their concern for the environment and the people, and ours are no different.

The NGP threatens the water supply of communities in the NW of NSW. The DPIE have acknowledged the water modelling has inconsistencies and is insufficient to provide stakeholders any confidence that there will be no adverse impacts.

Additionally, the findings of the Chief Scientist have not been fully implemented. The NSW Parliamentary Committee tabled a report on 27 February 2020 on the failure of the government to implement important Chief Scientist recommendations. The Parliamentary Committee's report identified:

- Major flaws in regulation and knowledge of CSG Industry
- Two recommendations had been implemented, six partially implemented with only a minority of what was recommended carried out and eight not implemented at all.
- Risk of environmental damage is uninsurable: and landholders are left to bear the risks posed by CSG activities.

We are concerned with the pollution and health risks of chemicals used in CSG production. During a Country Women's Association (CWA) of NSW Tour of the Santos NGP Facilities in October 2019, the Environmental Officer stated Santos was still looking for somewhere to dump their solid waste at sites within 200kms radius or possibly a landfill near Sydney. That's 117 tonnes per day, or 41,900 tonnes yearly. This salt will be contaminated with concentrated elements from the coal seam. Now just before the IPC Hearings commenced Santos announce this waste may become baking powder, with Santos and a US Company who have a memorandum of understanding (MOU) and are

investigating the ability to have a plant in Narrabri. An MOU and an 'investigation' are not a concrete plan, particularly when there are significant concerns associated with the risk of the waste to the environment. With the 'backup plan' identified by the CEO of Santos, Kevin Gallagher, stating if it is not successful, they'll use it for irrigation. Interestingly, during the CWA tour, it was noted that for a Santos facility irrigated Lucerne crop failed two years ago...

CSG development also mobilizes fugitive methane into the water, soil and air and contributes to the climate crisis, an impact that Santos or the Planning Department have not adequately addressed. Satellites are now travelling 600 kilometres above Earth, completing a circuit every two days mapping gas methane over every two square kilometres of land surface on the planet. The amount of methane emissions detected is evidence that gas leakage is far and beyond what the industry has been reporting. CSG is not a clean fuel.

These 'insignificant' impacts to the authors of the NGP Assessment Report will be very significant to individuals and their communities. Why should we accept that our farmland could be rendered worthless through no fault of our own, when Santos cannot even demonstrate to meet the requirements above?

4. Expired Petroleum Licenses (PEL's)

The NSW government has not only failed to implement all the chief Scientist recommendations released 6 years ago, they have not even followed through protocol on expired PEL's. What other industry gets such a free rein to call the shots?

There are 12 Petroleum Licenses (PELs) in North West NSW. All twelve have expired, but continue in force unless or until a decision is made on the renewal despite 11 of the 12 being largely 'inactive'. These Licenses extend from the Upper Hunter and Liverpool Plains north to Moree and west to Coonamble.

These are old licences that pre-date the recommendations of the Chief Scientist report, which recommended the government "designate those areas of the state in which CSG activity is permitted to occur". A new framework to do this has since been created but none of these licences have been through such an assessment. These licenses spread across some of our most vital ground water resources, including the productive groundwater of the Liverpool Plains and aquifers of the Great Artisan Basin (GAB). The Licences are creating uncertainty for farmers across 4.6 million hectares of land who deserve action rather than being left at the mercy of gas companies with PEL's that extend indefinitely.

Petroleum title holders are required to comply with minimum standards and failure to comply with those grounds for not renewing titles. Minimum standards require a work program which includes active work being undertaken and community consultation. None of the 11 titles have been the subject of active exploration in the last 5 years and none appear to have current active work programs.

The NSW National Party passed the motion, "That Conference calls on the NSW Government to extinguish Petroleum Exploration Licenses as soon as they expire" at the State Conference in July 2019. Our elected National Party representatives have not also followed grassroots Policy having recently received communication stating they are waiting for the NGP outcome and if approved will renew these PEL's.

We are proud Australian farmers producing some of the best food in the world with the most stringent guidelines. So therefore we ask, why should we jeopardise an industry and family assets that have supported the community and the nation for its food security for hundreds of years to a 20 year industry that cannot even demonstrate to meet safeguards for the community and environment?

Yours's faithfully,

Handwritten signatures of Andrew and Helen Strang. The signature on the left is 'A. Strang' and the signature on the right is 'H. Strang'.

Andrew and Helen Strang