

Dear Commissioners

Thank you for the opportunity to make a submission and express my views regarding the Narrabri Gas Project.

By way of brief background and context, I have worked in the sustainability sector for nearly 25 years, including considerable work toward creating a sustainable energy system.

Sustainability is scientific and ethical philosophy. In broad terms, it aims to ensure a fair sharing of resource use by and between current generations, plus leaving a legacy for future generations. Sustainability also considers inter-species issues, i.e. for non-human life, both as it pertains to human standards of living and in relation to the lives of flora and fauna in their own right.

Whichever way I look at the Narrabri Gas Project I conclude that it will weaken the sustainability standing of Australia and the world. The project is predominantly destructive, rather than generative, extremely risky, and ultimately not even necessary.

For these reasons, I wish to join with the 98% of parties who made submissions regarding the Environmental Impact Statement, and express my strong objection to this proposed project.

My rationale for making this objection is unpacked below.

Please feel free to contact me should you require any additional information or wish to discuss this submission further with me.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Adam Blakester', with a stylized, cursive script.

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BIODIVERSITY

The 6th Great Extinction has begun, and the primary causes are human-made. This is often named the 'Holocene' or 'Anthropocene' extinctionⁱ.

Beyond the inherent value of these non-human species in and of their own right, there is increasing evidence of how human wellbeing could be negatively affected by these vast losses of biodiversity.

A commonly used metaphor is that the web of life, in all its diversity and inter-relations, is like an airplane. If one rivet comes out of the plane, like one species, the plane will probably still be fine. However, as more and more rivets are lost, the integrity of the entire plane starts to fail.

Given the current global Covid19 pandemic, the Commissions ought be particularly attentive to the growing links between degradation of natural habitat and the rise of viruses and bacteriaⁱⁱ.

The proposed Narrabri Gas Project will negatively impact on a massive area of 95,000 hectares, further fragmenting and degrading the natural capital and biodiversity. While technically, the physical footprint of the gas operations will only require 1,000 hectares, it will nonetheless fragment and further weaken the forest. Furthermore, the stated impacts on threatened and endangered ecology specifically, ought be completely unacceptable for any project, this one included.

In addition to these direct impacts, the proposed project will generate significant waste issues that could further degrade the local ecology, particularly the 840,000t of solid salt waste, including heavy metals.

How could any development that further threatens Australia's iconic koala population be approved in a context such as that we live in today? Surely now is the time to make an end to projects which degrade rather than regenerate Australia's natural capital.

WATER SECURITY

Australia is one of the driest continents on Earth. Water is precious, perhaps sacred even.

The most recent 2017-2019 drought in Eastern Australia has been acknowledged as 'officially the worst on record in the Murray–Darling Basin (MDB)' and had 'exceeded the Federation Drought, the WWII drought and the Millennium drought in terms of its severity through the MDB'.ⁱⁱⁱ

While drought is particularly pertinent to rainfall levels, water security also takes into account ground water. The Great Artesian Basin (GAB) is Australia's most significant ground water resource. Its size and significance arguably make it internationally significant.

However, the GAB has been significantly degraded in recent centuries. Extraction of water is far exceeding recharge, with in excess of ten thousand bores throughout the system. Water pressures are declining and natural springs have dried up. Estimates of the age of water in the

GAB range from thousands to millions of years.

Given this context, it is completely unacceptable to allow a development which is based upon water modelling which has high levels of uncertainty and proposes to:

- Remove 37.5Bn of ground water over two decades
- Physically drill into and through the complex and inter-connected aquifers below the Pilliga Forest, including into parts of the GAB
- Risk impairing of the Pilliga Sandstone recharge aquifer of the GAB.

CLIMATE CHANGE

We are now beginning to see and feel the impacts of the early stages of human-induced climate change.

Eastern Australia's 2017-2019 drought, as referenced above, in turn contributed to the conditions which resulted in Australia's so called 'Black Summer' of bushfires in 2019-2020. There were similarly the most severe bush fires yet recorded. More than 18m hectares of land was burned, an estimated 3Bn land-based animals were killed, thousands of buildings were destroyed and dozens of people died.

Two of the major drivers of this climate change are greenhouse emissions from fossil fuel use and degradation of natural carbon sinks, such as forests and soils.

While a large body of climate scientists concur that we need to limit global greenhouse levels to below 350ppm of CO₂e so as to ensure a healthy climate (for humanity), actual global emission levels have already passed 400ppm (Mauna Lau Observatory, Hawaii, 2013).

In this context, any and all further emissions, be that gross or net emissions, are totally reprehensible for the risks they pose to human life on earth. The inter-generational equity issues on this point are significant.

The proposed project is estimated to emit a further 127.8mt CO₂e over its first 20 years of operation.

This is totally unacceptable. Who speaks and acts for our children and grandchildren who inherit the consequences of our actions today?

ECONOMIC OPPORTUNITIES

There is little doubt that the impacts of Covid19 have heightened the need for immediate economic development in Australia. In regional areas, such as Narrabri, this need was already high before Covid19 emerged.

Ideally, new economic development would be highly sustainable financially as well.

However, the financial character of the proposed development is far from sustainable.

The fact that the risks posed by the proposal are largely uninsurable is a case in point. Why should NSW residents and taxpayers have to underwrite this risk should the proponent not have the financial means to make-good on any and all damages? Why do affected neighbours, such as farming operators, need to carry this risk?

While the project will of course generate investment, employment, procurement, royalties, taxes and other economic values, this needs to be compared and contrasted with other opportunities.

In contrast, it is proposed that a national transition strategy to create a zero-net emissions electricity network, including demand-side and efficiency upgrades, would create far more economic value, including investment and employment, without the unacceptable risks that are inherent with unconventional gas mining projects, including this one.

- i [Holocene Extinction](#), Wikipedia
- ii [To prevent the next deadly disease, we must stop harming nature](#), National Geographic, 20 July 2020
- iii Dr David Jones, Climatologist, Australian Bureau of Meteorology. Source: [Interview with Farm Online National](#), 18 July 2019