**Written submission to the** **Narrabri Gas Project IPC 10-07-2020**

**By Angela Burrows**

In my video online presentation, I addressed two main pints,

1. Respect for the sacred nature of the land, water, biodiversity and the interconnectedness of everything as known over millennia by the First Nations people – the Gomeroi in the Pilliga area. Preservation for present and future generations is the first priority.
2. The current climate emergency requires a halt to all new fossil fuel projects.

The decision of the IPC is both a moral and existential one. The Narrabri Gas project lacks global, Australian, state, local and personal intergenerational equity and is against the wider public interest in multiple ways some of which I will address more fully in this written submission,

Having listened to the hearing over seven days of powerful, moving, deeply felt and well researched presentations from a huge variety of people from local, surrounding and regional areas and more widely across NSW, together with recent evidence from many highly regarded scientific professionals I am even more convinced that this project does not have public license and is definitely not in the public interest.

The DPIE recommendation suggests that it is a state significant project because it will bring investment and jobs to NSW and stabilise gas supply. In imposing conditions and monitoring requirements on Santos the Department acknowledges that the project brings with it many risks which they dismiss as minimal, acceptable or remediable. They offer an ‘approve first and fix it up later’ approach, a sort of ‘have now pay later’ scenario whilst also recognising that so many of the possible adverse effects especially those associated with water and biodiversity are not able to be reversed.

Alas, what is not presented is a clear vision for the future. This project is very short lived at best whereas Australia is an ancient land and the First Nations culture is amongst the oldest in the world and their communities presented strong opposition to drilling 850 csg wells in their cultural lands.

It seems that the DPIE are unable, or refuse, to grasp the gravity of accelerating global climate change or the imperative to protect our land, water, air and biodiversity for the future generations.

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Addressing claims - bullet points and in bold - made in the report Summary

***The community has raised significant concerns about the project saying it would damage the region’s water resources, cause significant biodiversity impacts on the Pilliga State Forest, generate substantial greenhouse gas emissions, and adversely affect the health, safety and cohesion of the local community***

The vast majority of live online and written submissions presented to the IPC back up this previously expressed community concern making it abundantly clear that these concerns are in fact valid and strongly held throughout the community. The DPIE report has increased concerns especially around water and climate concerns following the severe drought and damaging summer 2019-20 bushfires. We heard around 400 presentations based on sound evidence and many years of detailed, time consuming and painstaking personal and group research constantly being brought up to date. Speaker after speaker explained the serious irremediable nature of risks, especially to groundwater posed by drilling of 850 csg wells in the Narrabri/Pilliga forest are nearby framing area.

Communities from nearby regional areas also presented their concerns that approval of he Narrabri project may lead to opening up of further existing PELs in their areas allowing the whole of the NW NSW to become an industrial gas field - this concern was increased by Kevin Gallagher’s statement - *The outcome will play a role in determining where Santos makes its next investments in natural gas development, and we want to invest here, in New South Wales. Since 2011, we have spent more than $1.5 billion acquiring, appraising, developing, 30 and operating gas assets in the Narrabri region.*

Of further concern to locals and surrounding areas is the need for a pipeline causing enormous disruption to multiple land owners. Yet another strong reason not to approve this gas project.

Addressing further the points made in the report’s Overview summary:

• **is critical for energy security and reliability in NSW as it would: o provide essential gas supplies to the domestic market to address forecast shortfalls from 2024**;

NSW had a stable, reliable, cheap gas supply until a small group of private companies, led by Santos, were allowed to develop an export industry in Qld. When in 2014 the Australian Pipeline Association APA reversed the direction of gas flow from Moomba to Sydney so the cheap gas from Victoria and South Australia could flow to the Qld export terminal instead and NSW prices increased [Mark Ogge Crikey 2-10-2017] Now, 70% of local gas is sold overseas and NSW gas has more than doubled in price [DPIE report p.x]. Supplying half of NSW gas needs from the Narrabri project would only benefit the gas companies as gas that would have been supplied to NSW will instead be supplied to the export market. Opening up new gas fields will obviously increase the overall amount of CO2 and CH4 emissions.

Recently two overseas import terminals have been approved in NSW so we can import our own gas back again! The way governments have been manipulated by the gas cartel is beyond belief and the Australian public and industries are paying the price.

This must stop**. NSW energy security should be remedied by government regulation reserving domestic gas supply and capping the price**. There is plenty of supply for Australian needs during transition to low carbon economy. Extracting more gas is not the answer, it will only increase the power and profit of the gas industry.

Shortfalls in 2024 are now in doubt. The gas situation has changed, gas usage is falling both locally and worldwide.. Many presenters gave updated reports recognising that there is currently an international gas glut, prices are dropping and investors are running away from gas due to the climate consequence of investments in fossil fuels. In recognition of the imperative to reduce greenhouse gas emissions the ACT plans to phase out gas supply in coming years.

The Narrabri gas project is just not needed for NSW energy security. A recent AEMO report states that Australia can be 94% powered by renewable energy by 2040 and earlier if constructive planning was implemented

The exciting new NSW renewable energy zones will enable the government to progress and support modern technological advances demonstrating renewable energy applications in industry for Australia to become a world leader!

The report does not recognise the basic problem: the Australian public have been hijacked by our governments in favour of the gas industry and this project is yet another instance of a big company trying to ride roughshod over local communities throwing largess around to buy their way in.

The gas industry is ramping up its use for plastic production despite the fact that plastic pollution is amongst our greatest waste creators. Coupled with this is the recent push for Incinerators to burn the plastic waste…yet another dangerous polluting industry merry-go round!

o **put downward pressure on gas prices;**

This is not an important issue according to Mr Kitto’s response to questioning by Mr Beasley on day one of the hearing where he said

*MR KITTO: And I think it would be fair to say, you know, no one is saying in our – well, we’re certainly not saying in our assessment that that – the Narrabri Gas Project will reduce gas prices.*

In fact, gas prices have recently fallen as global supplies have increased. The extraction costs in Narrabri would make it impossible to lower the domestic gas prices in NSW.

Santos is responsible for the increases in NSW gas prices. Despite claiming in the 2009 Gladstone LNG EIS *- that it will not divert gas from local markets to export markets*, that’s exactly what did happen - *‘the Santos led GLNG project has diverted natural gas from domestic users to export markets … and has been the major contributor towards any natural gas shortfalls withing the Eastern Gas Region’ [*Pegasus Report on the Narrabri Gas Project (Aug *2019*)*]*

Having caused this disruption in the eastern gas market Santos is now seeking to recoup some of its losses by inflicting this destructive csg project on the rich agricultural and natural forest area of NSW. It is like rubbing salt into a wound. We can’t trust this company.

o **facilitate the extension of the existing gas pipeline network to northern NSW, bringing it closer to the strategic gas supplies in both Queensland and the Northern Territory;**

Reservation of domestic gas would solve any supply problems and does not require more pipelines. It was working quite satisfactorily before the export facility opened.

Pipelines are yet another unwanted impost on the many regional communities There is enormous opposition to any new pipeline and many of the local farmers explained why – refer presentations by …Doug Storer, Colin Irving, David Walis, Helen Carrigan, Annette Wallis, David Quince, and many others described the damaging effects of laying pipeline in the vulnerable soils in the area. Many of them felt their concerns were not regarded as important in this whole process

**o support the development of gas-fired power stations in NSW to provide dispatchable energy to the National Electricity Market (NEM**) as it transitions away from a long-term reliance on coalfired power stations to a greater reliance on renewable energy; and.

The success of the Tesla ‘big battery’ in SA shows that future back up is most likely to come from batteries. The inclusion of battery and pumped hydro back up is rapidly decreasing the need for peaking gas plants.

Gas generators have frequently been the cause of price rises. *As*[*Giles Parkinson has reported*](https://reneweconomy.com.au/aemc-sees-no-market-gaming-but-says-batteries-will-lower-prices-42472/)*, the deliberate manipulation of capacity, availability and bidding strategies that ensures that incumbent fossil fuel generators maximise their profits, at the expense of consumers, is considered one of the biggest jokes in Australia’s energy industry*. The inclusion of the five minute rule will further change the dynamics of back up supply. <https://reneweconomy.com.au/batteries-the-winner-as-5-minute-rule-promises-to-end-gas-market-gaming-70704/>

• **deliver significant economic benefits to NSW and the Narrabri region and stimulate the economic recovery from the effects of the COVID-19 pandemic, including**:

o creating jobs and attracting investment to the region; o providing up to $14.5 million to Narrabri Shire Council for community projects and infrastructure;

o setting up a Community Benefit Fund with up to $120 million to share the benefits of the project with the local community; and

o facilitating economic development in Narrabri, including the development of a new industrial estate;

Recovery from the pandemic must be forward looking not based on an out of date ‘quick fix’ which at best would only last for 25years. Somewhat overlooked in the DPIE report are the adverse health effects of the NGP itself. There is total lack of baseline date. The Department did not think this important, regardless of the increase in adverse respiratory and cardiovascular ailment recorded in Qld bu Geralyn McCarrol. Presenters like Dr bob Vickers, Dr Helen Redmond, Dr Gary Lyford, pointed out the folly and future concerns around both physical and manetal health impacts if this NGP goes ahead.

This project suggests UPTO 1300 jobs would be created in the development stage. It would bring people and possibly a short term boom to the Narrabri area but based on experience in small towns in Qld it is likely to be a boom and bust scenario. The potential for local ongoing jobs as been contested and numbers as low as 50 have been quoted,

The jobs mentioned further research on using the Soda Ash biproduct to create bicarbonate of soda – this sounds like a hastily sewn together idea to bolster this project as good for Covid 19 recovery. It is very far from any concrete proposal.

Better options for Covid recovery are to be found in reports addressing the future Jobs including the Beyond Zero Emissions *Million Jobs plan* and the Climate Council’s *76.000 jobs.*

Whilst

From questions of Kevin Gallagher at hearings it sounds like the Community Benefit fund is yet to be finalised. Whilst some of it may benefit the community, much of it appears to be expenditure needed for Santos to pursue its business.

• **has been designed to minimise any 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;

*‘Water is Life’* as I said in my onscreen presentation. This is the single greatest concern of the majority of local presenters. Without water neither people nor agriculture can survive. North west NSW is often referred to as our food bowl and agriculture is of paramount importance. The soils in the area are amongst the best in the world and along with water are our most precious resource. Locals with personal experience of generations living in the area and others have done tremendous ongoing research into the Great Artesian Basin and its vital Pilliga recharge zone and experts like Matthew Currell in his online 23-08 presentation gave recent experimental data. All are agreed that any risk of damage to the essential water resources is too serious to allow and could not be remediated.

It is also clear that the hydrology of the area is very complex and not clearly understood with need for further measurements. Where there is any possibility of risk to this irreplaceable, millions of years old water resource it is powerfully argued that the Precautionary principle should be applied despite protestations of David Kitto to the contrary.

Remember Santos said the GLNT export facility would not jeopardise local domestic gas supplies!

• **would comply with the relevant requirements and standards in government legislation, policies and guidelines**;

As emphasised by many speakers, the recent Parliamentary report on Implementation of the 2014 NSW Chief Scientist’s sixteen recommendations was critical of the limited completion of these recommendations *there is clearly more work to be done. Where the committee has identified that the government has not implemented the recommendations of the NSW Chief Scientist in full, we have recommended that all outstanding aspects of each recommendation be implemented.* ‘*…*

The parliamentary report also highlighted lack of transparency and inability to access information *‘it also became apparent to the committee that in the five years since the release of the NSW Chief Scientist's report, public communication and access to information about coal seam gas activities has not improved, with efforts by stakeholders to gain information often unsuccessful. The committee has therefore recommended that the NSW Government commit to further improving the accessibility and transparency of information relating to coal seam gas and the wider gas sector….’* This is of serious concern for monitoring of the many conditions for approval included in the DPIE report.

Later Environment minister Matt Kean stated that csg mining in NSW should not be allowed to proceed without full implementation of the chief scientist recommendations.

This project can not receive approval at this time.

• **would not result in any significant impacts on people or the environment; and that**

What would constitute a significant impact? Drilling 850 coal seam gas wells and associated infrastructure will have serious impact on the people and environment. It could only be described as insignificant by people who do not live in or visit the area. Roads and well pads, settling ponds, reverse osmosis plant and other infrastructure will compact the land and cause fragmentation of the forest ecosystems and increased movement of vehicles and people will affect biosecurity. Flaring gas towers will create light damage and affect surrounding wild life and humans and risk compromising the exceptional ‘dark sky’ area of Siding Springs observatory. Additionally flares, gas wells and shallow gas pipelines and are in themselves a serious fire hazard, especially in tines of increasing temperatures and drought.

Santos has no plans in place to deal with the vast quantities of toxic salt waste. Spills of the produced water from the coal seams contain all types of toxic compounds and have already caused irreparable damage to areas of the forest as described in words and pictures to the IPC.

Santos say there may be manufacturing uses but no definite plans in place. Their suggestion that this could be classed as general waste and sent to 11 local landfill facilities is not substantiated by any agreements with such facilities. This is a very serious situation. Toxic salt is a risk to all land types and ecosystems. Should it be sent to landfill/waste disposal sites it will be a contamination risk to surrounding and water resources. Refer presentation by Anna Christie, Hugh Barrett, JohnTough,

• **any residual impacts of the project can be reduced to an acceptable level by capping total water extraction to 37.5 gigalitres (GL) over the life of the project and requiring Santos to comply with strict standards, rehabilitate the site to a high standard and offset the biodiversity impacts of the project** The Department has recommended a comprehensive suite of strict conditions, which have been developed in consultation with key government agencies and independent experts, to ensure this occurs. Based on this assessment**,**

As stated above the toxic salt waste will pose a lifelong impact wherever it is stored. The linings of holding ponds eventually break down and leak. There is no economically feasible way residual impacts be reduced to an acceptable level.

Any conditions imposed and requirements for monitoring are only as good as the personnel available to do the monitoring. This is costly and would cut deeply into either state of Santos budget but there is no commitment plan in this report for funding this process.

Monitoring of compliance by fossil fuel companies is notoriously poor and mostly left to the companies themselves to report. Santos have already breached regulations and caused contamination of land and water once approval is given what would change? It is simply not adequate for Santos to do monitoring. It would be akin to having the fox in charge of the hen house.

**the Department considers the project is in the public interest and is approvable subject to strict conditions.**

Having worked with the Knitting Nannas and local groups in the Narrabri area over the last six years, listened to around 400 verbal presentations and read many written submissions and other reports this statement cannot be accepted regardless of conditions, however strict. It is definitely not in the public interest on any level at all. Even the relatively few jobs are mostly short lived and not likely to benefit local communities over the longer term.

When questioned by Mr O’Connor on day one regarding ESD principles in the DPIE report Mr Kitto’s response that it is throughout the report highlights the Department’s one sided focus and failure to fully understand the importance of all three aspects.

Conditions look good on paper but are seldom upheld and it is again left to local people ti report breaches. Santos has failed to remedy past leaks and spills despite many years of trying.

This community has had over ten years of worry and stress caused by this proposal, it does not have social license.

While the WEP identified some uncertainties, principally due to the lack of detailed information about the deeper geological substrata, it concluded these uncertainties “could be addressed through ongoing monitoring, adaptive management and a robust regulatory regime that is rigorously and effectively enforced.” P ix Dept Narrabri report

As outlined by several experts on various disciplines it is completely unacceptable to say there might be problems but we’ll approve it and keep an eye on things. All uncertainties are risks. All monitoring of such uncertainties should be completed prior to any approval being given.

And lastly recent statements by insurance companies that they will not provide public liability insurance for properties with CSG infrastructure on them should sound very loud warning bells to all land owners. The risks are uninsurable! Why would this project receive approval.