Please find attached submission.
16th December 2012

Dear Sir/Madam,

Re: Camden Gas Project Stage3, Project Application 09_0048

I strongly object to AGL’s project application 09_0048 to mine coal seam gas in Campbelltown and Camden. The reasons for my objection are stated below.

Introduction
I do not wish to be a guinea pig for AGL, the NSW Liberal government, the wealthy or the rest of the state in AGL’s plan to mine coal seam gas for huge financial gain. The idea of Campbelltown and Camden residents having to fight to defend their right to live in a clean and safe environment is deplorable, and the height of arrogance. Independent research and testing, based on scientific principles, must be done before this project is even considered and to date it has not!

CSG Mining a Technologically-Evolving Industry
I am alarmed that CSG mining is a technologically-evolving industry whose impacts have not been independently and scientifically fully researched and tested. They remain largely unknown. This view is supported by professional organisations and academics in the evidence to the NSW Upper House Senate inquiries into Coal Seam Gas Mining in 2011 and by subsequent research here and overseas.

Self Monitoring by AGL
We have had to rely heavily on industry for much of our information when industry has a vested interest in pursuing projects for financial gain. AGL claims that the Camden Gas Project has been safely operating for 10 years. Yet we understand that the groundwater and air quality have not been adequately monitored, and while AGL has been operating under the Environmental Protection Licence (EPL No.12003), it has been allowed to self-monitor its compliance, self-investigate incidents and self-report such that we do not know true impacts it may have had.

Lack of Independent and Scientific Testing
Research and testing is not independent or ethical when the entire process including monitoring is carried out by industry itself. Nor is funded or co-funded research by CSG mining industry. Third party consultants and external laboratories that are engaged and paid for by the industry make this process highly suspicious and non-transparent. The NSW state government has been remiss in allowing this to happen. These lessons should have been learnt with asbestos in Australia and with ‘Big Tobacco’ in the
USA. The National Water Commission in its Position Statement (3rd December 2010) said that impacts may emerge over a long period of time. I am seriously concerned that the community and taxpayers will bear the costs of any unforeseen problems long after AGL is gone from the area. This is grossly irresponsible, especially considering that AGL will not be held accountable for any damage, danger or ill health.

Impacts on Health and the Environment

The science has not yet been established to determine the possible damage to the environment and our health that may be caused by gas mining, especially under our homes. Related problems such as accidents and subsequent injuries also need to be investigated. Doctors for the Environment Australia claims that health impacts from CSG mining have not been assessed. Preliminary research from Queensland (e.g. by Southern Cross University in Tara) and overseas is deeply concerning, especially when fracking has been used. As at December 2011, 85% of the production wells in the Camden Gas Project had been fracked (evidence from the NSW Upper House Inquiry) with inadequate monitoring of its environmental impacts, especially on water. AGL claims that the use of horizontal wells in the proposed Stage 3 will reduce the need for fracking, however, this is not true as AGL has reserved the right to frack these wells in the future if and when the technology becomes available. The size of the proposed well clusters and any fracking of horizontal wells are both new and untested here. It will therefore be entirely experimental with unknown outcomes on health and the environment. The National Toxics Network says many of the chemicals used in fracking and drilling are not approved for safe usage. The needs and quality of life of a large population of people is being totally overlooked by AGL and the NSW Liberal government. Also the possibility of land subsidence under so many urban properties would be a huge burden for families.

Impacts on Air Quality

The Nature Conservation Council has already determined that the project should not go ahead without having a clear idea on emissions impacts of CSG, especially when AGL has already to using the controversial fracking process at Camden. I am concerned about evidence from Queensland and overseas on air quality and the cumulative impact on AGL’s expansion into an area that already experiences unacceptable levels of air pollution. That is, ozone and fine particles associated with respiratory problems (NSW Environmental Protection Authority). AGL’s past performance has probably already contributed to this problem. In August this year AGL admitted that it had failed to carry out continuous air monitoring at its Rosalind Park Gas Treatment Plant for three years in breach of its EPL No.12003. So it gives no confidence that it can be relied upon in the future to carry out such testing or even cares about the consequences.

Impacts on Water Quality

Project 09_0048 poses risks to Sydney’s water in general and to the South West in particular that have not been adequately assessed. While AGL claims that the geology of the Sydney Basin is well known, AGL’s rationale for the constant modification of prior stages of the Camden Gas Project seems to contradict this, as does its admission to the Scenic Hills Association that it does not know where the aquifers here run to but probably Sydney Harbour. Potential impacts on Sydney Harbour, on Sydney Water Catchment, and AGL’s proposal to run its gas gathering pipeline along Sydney’s Upper Canal on public land are unacceptable risks to Sydney’s water, and are an abuse of public property for the benefit of private investors.

Effects on Land, Land Values and Quality of Life for Affected Residents

As a long term resident of Campbelltown and a rate payer I am deeply concerned and extremely
annoyed that such a project is even being considered in residential areas. Residential areas with dense populations are no place for mining. Allowing mining in areas that are not zoned for heavy industry undermined zoning controls and confidence in the planning process. It creates severe land use conflicts, economic instability, inequality and an unsightly mess. It will disrupt religious communities whose vocations have so far been protected by the Scenic Hills zoning. It will threaten the survival of the entire historic scenic hills by placing undue burden on small rural allotments whose capacity to cope is severely reduced by size. CSG mining is unsightly and unsafe in urban areas with a potential escalation in mining accidents associated with more intense urban activity, the presence of children, and potential for vandalism. Gas leaks and potential explosions where fires burn continuously have not been ruled out. The impact on land and house values as a consequence of CSG mining could be devastating for home owners as has been seen in Queensland and the Hunter Valley. It seems it is very difficult if not impossible to sell land that has been mined for CSG due to a trail of devastation and destruction left by mining companies. For many people the home is their largest asset and is often leveraged to support small businesses. Any devaluation by bank assessors may destroy livelihoods and life savings.

Non-Compliance of AGL with Regulations
In my opinion the NSW Government’s new regulations for CSG mining will not ensure its safe operation in Camden and Campbelltown. As the only commercially producing gas field in NSW, the Camden Gas Project has already been operating consent conditions. Yet the NSW Government has not been able to ensure compliance, as evidenced by on-going breaches by AGL of its licence conditions, and the discovery of incidents that might not have been reported were it not for community vigilance, such as the Sugarloaf incident in May 2011 in Menangle that allowed well contents to drift over Sydney’s water channel and to nearby Glen Alpine houses. The Adaptive management process allows damage and accidents to occur.

The Process of Assessment
I believe that the process of assessing State Significant Developments is severely flawed and lacks transparency. There seems to be a conflict of interest as members of the Independent Planning Assessment Commission are appointed by the Minister. Brad Hazzard recently showed bias in favour of AGL and absolute contempt for residents of Camden and Campbelltown on national television. He should be stood down for his appalling behavior and lack of impartiality. The Land and Environment Court would have been a more appropriate place to test any government approval of AGL’s project. The current process has taken away our democratic to go to the courts and if the PAC approves this project then we will be proved right. Even if this were a fair process AGL cannot be relied upon to comply with the relevant regulations and the state government allows this to happen. AGL is breaking the law by not following the appropriate regulations and the state government is turning a blind eye.

Gas Production and Associated Risks
AGL will continue to produce about 5% of NSW’s gas from the Camden Gas Project according to evidence it gave under oath at the NSW Upper House Inquiry. The risks and potential costs to the community do not justify this, particularly since 150,000+ people already live and work in the immediate affected area, and this is Sydney’s south west growth corridor. It is socially, environmentally and economically unjustified, and has no social licence to operate here. Coal seam gas mining is simply not worth the risk. There are potential dangers to the environment and wildlife, to property and homes and to the safety and health of residents from such things methane leakage, water contamination, land subsidence, poisoning of underground water resources and aquifers from the toxic chemicals. . It must be obvious to AGL and the NSW Liberal government that Macarthur residents are strongly opposed to mining under their homes due to the potential risks already discussed.
**Conventional Gas Mining – Plentiful Supply**

Conventional gas mining (such as in Bass Straight) has fewer environmental problems than CSG. BHP has indicated that there is enough conventional gas available to keep the entire east coast supplied almost indefinitely. So why do we need to urgently exploit the very dodgy CSG when we have vast alternatives elsewhere? Is AGL, an extremely wealthy and greedy corporate, setting the agenda for the NSW Liberal government? This project has no benefits for local residents. It is interesting to note that CSG has been banned in France.

**Lack of Communication and Consultation with Affected Residents**

AGL has failed to adequately communicate and consult with the public on the northern expansion project, and many have found it difficult to acquire specific information pertaining to the project. Residents were not informed of the meetings nor did they receive letters from a letterbox drop. In Campbelltown only one public meeting was held, with the majority of residents not knowing it was on. They have the right to be properly informed and consulted on issues that directly affect them their families, particularly when it comes to their homes. The deadline date for submissions to the PAC is totally unreasonable, being just before Christmas. It seems that AGL and the NSW Liberal government are hoping the majority of residents won’t respond.

**Feedback from Land Owners**

Many land owners who were affected by the initial stages of the Camden Gas Project have given first hand information on their dissatisfaction with the project. They claim to have been given little information on the environmental and health impacts of CSG mining, and to have been coerced into submission, with AGL threatening legal action if land owners didn’t co-operate. There was little consensus and harmony. Only those with the funds to do so could fight AGL in court. The AGL project could be likened to the “Erin Brockovich” saga with the wealthy and powerful, benefitting from the poor and unaware. South Western Sydney is quickly becoming a dumping ground for the rich.

**Comments on Motivation for and Safety of the Project**

The motivation for this project is pure greed and self interest. If CSG extraction is as safe as AGL claims it is then let AGL executives and NSW Liberal politicians test it in their own local areas and back yards. I suspect in the leafy blue ribbon liberal seats of the northern and eastern suburbs of Sydney. Also the NSW Liberal government and AGL should be prepared to give a water tight guarantee that they will be liable for and provide compensation for all damage, destruction, personal losses and ill health by affected residents. Why should AGL have the right to potentially destroy our environment, and then walk away? We wish to preserve our beautiful environment for future generations.

**Conclusion**

Campbelltown City Council and local federal MP Bryan Doyle strongly oppose AGL’s northern expansion project because it is an extremely bad idea. This project requires more thorough independent and scientific testing by people with the appropriate technical and scientific expertise. The PAC needs to demonstrate integrity and accountability in its assessment of this project. Any committee who would recommend a project where processes and materials have not been fully and independently tested is irresponsible.

I do not want my name made public on the Department’s website or to AGL.

Yours sincerely,