

**Submission to the Independent Planning Commission  
Narrabri Gas Project  
Objection**

Dear Independent Planning Commission,

You can include my name and submission on your website.

This is a submission on the Narrabri Gas Project.

I object to the proposed Narrabri Coal Seam Gas Project due to its significant environmental and economic impacts.

I am making this submission as a senior in our society because I am concerned to safeguard the Australian environment for future generations. I would like to address the following issues:

Emissions

Biodiversity

Land and water quality

Economics

**Emissions**

Gas is often talked about as a “transition fuel” to renewables. As a former science teacher, I know that yes, 1kg of CSG yields a little less carbon dioxide than 1kg of coal, as it has less carbon/kg, but, when burnt it still results in a huge amount of carbon dioxide added to the atmosphere in a decade where the rapid advances in both renewable technology and the uptake of these technologies by commercial enterprises means that the harvesting of additional fossil fuels is unnecessary. The October 2019 report from Pegasus Economics states solar and wind is developing faster than expected, reducing in cost and already displacing the need for gas-fired electricity.

Added to this is the fact that CSG projects are notorious for leaking Greenhouse gases, mainly methane. Associate Professor Bryce Kelly, an environmental scientist from the University of New South Wales has said that the proposed Narrabri Gas Project would become one of the top 100 greenhouse gas emitters in Australia if approved. Methane remains in the atmosphere for 10 years at least, and so this project would contaminate our air for the next 35 years. Current research shows that methane is 30 times more potent than CO<sub>2</sub> in its contribution to climate change. This does not accord with the NSW Government strategy for lowering emissions.

**Biodiversity**

The Pilliga is the largest temperate woodland in NSW. Santos proposes clearing nearly 1,000ha of the Pilliga, including habitat for the critically endangered Regent honeyeater and for koalas which have already lost 30% of their habitat within NSW in the Black Summer fires. A Parliamentary enquiry released in June 2020 found that koalas have become extinct in the Pilliga Forest during the last decade. I read today that the NSW Minister for the Environment Mat Keane is committed to restoring koala numbers. We need to save habitat for wildlife, not allow commercial interests to destroy yet more of our precious wildlife heritage.

The Santos Assessment Report states “the project is unlikely to significantly impact any of the identified threatened fauna species, given the relatively small area of habitat removal and the presence of large areas of suitable habitat in the region.” However, the report does not take into

account that the project has the potential to impact threatened fauna through direct habitat clearance, habitat fragmentation, vehicle strike and predation by pest species. This could disrupt the breeding cycle and adversely affect habitat critical to the survival of these species.

Thirty-five threatened species rely on the Pilliga for survival—including the endemic Pilliga Mouse, Squirrel Glider and Black-striped Wallaby. It also forms part of a stronghold for threatened woodland birds including the Glossy Black Cockatoo. The future of the Pilliga Mouse is threatened by this project due to the spread of invasive predator species, and consequent increased rates of predation; the increased fragmentation from access tracks and dispersed clearance potentially creating unfavourable microclimates, open space, and traffic disturbances. The loss of habitat is significant.

In addition, infrastructure of the Narrabri Gas Project poses a serious bushfire risk due to its highly flammable nature and the Assessment Report does not adequately account for how this risk will be managed. Due to the presence of permanently lit gas flares, former Fire and Rescue NSW Commissioner Greg Mullins has expressed concern that the Pilliga could “burn explosively” due to the nature of its vegetation and the project would dramatically increase the risk of fire. This would obviously impact the native flora and fauna dramatically. Surely, we should be trying to save habitat and wildlife, not drive more animals and plants to extinction.

### **Land and Water Quality**

CSG elsewhere has a history of land and water degradation. The Narrabri area feeds into the Great Artesian Basin and landowners in the area are so concerned about the possibility of damage to the Basin and to the land that 98.7% of them opposed the project when surveyed. Would we risk poisoning the very water that makes the area so agriculturally productive?

The Assessment Report concludes the project would not “adversely affect groundwater”. However, Associate Professor Mathew Currell, an environmental engineer from RMIT, has said that the Pilliga region has unusually pristine aquifers which could easily be damaged by drilling, especially after years of drought. Santos’ Bibblewindi water treatment facility has already suffered spills which contaminated bushland and there is a high probability of further similar toxic spills. Prof. Currell has said that neither Santos nor the New South Wales government have enough monitoring wells to ensure groundwater is properly monitored. Even the Narrabri Shire Council has expressed concern about water monitoring and possible environmental impacts. It seems that those dismissing these concerns are those in the employ of Santos (Guardian report).

Adding to water quality issues, there is still no adequate plan to safely and responsibly dispose of salt waste from the project which is set to be 117 tonnes of salts waste daily during peak production. The plan to dispose of it in nearby landfill is inadequate as no capacity evaluation of the landfill has been undertaken. Salty waste will leach from landfill and contaminate groundwater, farmlands and ecosystems. Australia is the driest inhabited continent on earth. We cannot afford to gamble with our water. Underground aquifers, like the Great Artesian Basin, support life across inland Australia. CSG drilling is simply not worth the risk and the studies are inadequate to thoroughly confirm there would be no adverse risk to groundwater.

### **Economics**

The Assessment Report by Santos states the project would “put downward pressure on gas prices.” However, the Institute for Energy Economic and Financial Analysis (IEEFA) states production costs at the Narrabri Gas Project are some of the highest in the country, with estimates to supply major domestic markets as high as \$9-10/GJ. Currently in Australia customers seeking long term contracts are paying between \$9-12/GJ to secure gas, leaving little room for profit generation. The project will clearly be at a globally uncompetitive price for gas.

Indeed, NSW does not need more gas resources which fuel dangerous climate change, especially now the NSW government has approved a plan to nearly double the capacity of the Port Kembla gas terminal. There is at present a global glut in gas supply and Bruce Roberson, an energy analyst, reports that many in the gas industry in the US are experiencing huge financial difficulties. This reinforces the fact that cheap international gas prices could easily price Narrabri out of the market. Why would NSW sponsor a failing industry?

### **In Conclusion**

Already gas is “old technology” as an energy resource. Australia should be looking forwards not backwards to build an energy industry that will last us for decades, not leave us with stranded assets. We can do so much more in the use of our abundant sun and wind, at the same time conserving our precious natural areas and wildlife. The people of Easter Island destroyed their environment to appease their gods. Surely, we should not be risking our natural environment to appease the gods of fossil fuels.

Due to the above reasons I strongly object to the Narrabri Gas Project. Thank you for the opportunity to comment. I look forward to hearing from you in regard to this submission. Thank you for your time and consideration of my submission.

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