



Environment Council of Central Queensland Inc.

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To the Committee,
Independent Planning Commission
c/- NSW Government

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Thank you for the opportunity to express objection to the Narrabri Gas Project in the Pilliga Forest near Narrabri as proposed by Santos.

I am writing on behalf of the Environment Council of Central Queensland (ECoCeQ). The issues I have discussed below are not limited to the local Pilliga Forest area. The impact of climate change, the loss and/or contamination of fresh water resources, the potential loss of the 35 threatened animals and 10 threatened plant species in the area, affects us all, in Australia and globally.

Our objections are made on the following grounds:

Climate Change

The science is clear that we must stop burning fossil fuels if there is any hope of keeping global heating under 1.5 degrees above pre-industrial levels. Latest research indicates that we are already on a trajectory to exceed this goal, which will have dire consequences for the Great Barrier Reef, our native fauna and flora, as well as ourselves and our offspring. Rising global temperatures from fossil fuel burning will devastate life as we know it with increases in bushfires, changes in rainfall and a drying landscape. When it is not burning, it will be flooding. Tropical cyclones may be fewer, but more intense and destructive, while rising sea levels and storm surge will make many areas uninhabitable. Right now residents at Wamberal north of Sydney are witnessing their homes slouch into the sea from coastal erosion. Areas susceptible to any of these events are becoming uninsurable, and will very quickly be unliveable once we reach that climate tipping point, which will be irreversible..

Alternatives

NSW or anywhere in Australia does not need more gas. Solar and wind are cheaper and cleaner alternatives, and the argument that gas is less polluting than coal is unfounded. The climate does not discern where the emissions have come from, and it is not appropriate to take the 'lesser of two evils' approach if there are options to avoid all carbon polluting emissions. The Narrabri Gas Project will liberate 5 Million tons of CO2 per year.

Recent CSIRO research on the impact of Coal Seam Gas which put a benign bias on CSG has been discredited and the reputation of CSIRO has been tarnished. The research is not considered independent as it was commissioned, paid for, and communicated via the same gas

industry it was researching. The Gas Industry Social and Environment Research Alliance (GISERA) funded \$2.26 million for the research, and 75% of this was contributed by Santos and Asia Pacific LNG (APLNG) led by Origin. The CSIRO research considered just 6 gas wells, all belonging to and chosen by Origin for the research, of the 19,000 gas wells in Queensland. The IPC must protect their reputation as an independent body.

Jobs

A recent analysis by The Australia Institute on the number of jobs created per \$1 million invested has revealed that the industries with least value in creating jobs were coal, oil and gas. Extraction of oil and gas create fewer than 1 job per \$million invested. Santos has acknowledged that drilling in the Pilliga will result in loss of jobs in manufacturing and agriculture. There is little to no value to NSW or the rest of us, in gas. The Queensland Resources Council is running a campaign for a 'royalties' moratorium in advance of the Queensland election in October. It is inevitable that this chancre will spread to NSW. Without the argument of royalties and the furphy of job creation, approval of these environmentally destructive fossil fuel projects depends on political donations and undue influence on politicians. Politics and industry have created a 'revolving door' between industry lobbyists and government ministers and advisers which is totally inappropriate in a modern Western democracy.

Water

Santos has proven to be incompetent in managing the waste water produced from CSG extraction with 20 leaks and spills so far, including a 7 year un-remediated event with the spillage of 10,000 litres of salty toxic water that has caused forest dieback in the Pilliga Forest. Santos failed to report this breach in 2013. Santos Narrabri Gas Project will produce 117 tonnes of Salt per day from the proposed CSG wells.

The Great Artesian Basin (GAB) is one of the largest underground freshwater resources in the world. The basic modelling undertaken by Santos 'does not hold water' – instead they will waste 37.5 BILLION litres of GAB water from under the Pilliga Forest which is a significant southern GAB recharge area. Santos regards this as having 'no significant impact'. Depletion or contamination of the GAB must be considered, as the Adani mine in Queensland will also have significant impact on this inland underground jewel in the heart of arid central Australia. IPC should consider Santos reputation and history, and consider cumulative GAB impacts from various projects. A 'cut by cut' assessment will see us at the 'death by a thousand cuts' scenario very quickly. The loss or contamination of the GAB water supply cannot be undone.

Biodiversity

Australia has the highest rate of mammal extinction in the world. A United Nations report in 2019 warned of the threat of extinction of 1,000,000 species globally within decades. The 35 threatened animal species in the Pilliga Forest are at further risk from habitat clearing, habitat fragmentation, and access by pests and vehicles facilitated by Santos for this unworthy project.

Habitat loss through the bushfires has meant that the iconic Australian Koalas may be extinct in NSW in 30 years. This has prompted the NSW Energy and Environment Minister Matt Keane to declare the NSW Government will double Koala populations by 2050, mostly through protection of their habitat. It makes no sense at all to allow destruction and fragmentation of any koala habitat, and especially in a State Forest such as the Pilliga. The Megalong Valley Bottlebrush is also an endemic and endangered species that will suffer Serious and Irreversible Impact should the Project be approved, and may face extinction.

Endemic fauna species such as the Pilliga Mouse, Squirrel Glider and Black Striped Wallaby do not occur anywhere else, and their habitat must be protected for them and for all the other fauna and flora, threatened or not. The Department of Planning Industry and Environment (DPIE)

assumption that *'the project is unlikely to significantly impact any of the identified threatened fauna species, given the relatively small area of habitat removal and presence of large areas of suitable habitat in the region'* should be taken with just a pinch of the 117 tons of salt that the project will produce. In this period of extinction crisis, we should be taking every measure to protect what we have left. The Department allegation is like saying *'the loss of the head of this person forms only around 8% of the body, and its removal is unlikely to have a significant impact on the person as a whole'*.

Given that the Serious and Irreversible Impact (SAII) guidelines under which the IPC is directed, it is imperative that the Project must not impact biodiversity values in this category.

We appeal to the IPC to endorse their independent status, and resist political pressure to approve. The ongoing environmental impacts are unable to be calculated.

We urge you to reject the destructive and polluting Narrabri Gas Project.

Yours sincerely,

Christine Carlisle
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