

From: Denise Murray  
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NSW 2390      Subject: **OBJECTION** to the Narrabri Gas Project.

I object to the Santos Narrabri Gas Project on the grounds that there are other preferred options to this controversial project without the many negative impacts associated with it.

I have made my assessment of the first nineteen pages from the Executive Summary on the Narrabri Gas Project and have concluded it exaggerates the benefits and trivialises the negatives. In my opinion this assessment report is regurgitated Santos, State and Federal Governments' spin.

In the nineteen pages of the executive summary they use vague words like:-

*'impacts of the project can be reduced'*

*'avoiding to the greatest extent practicable'*

*'minimise the economic, social and environmental impacts'*

These phrases were used on sixty four occasions. This is ample proof there will be negative impacts associated with the Narrabri Gas project, despite the attempts to *'reduce and minimise'* them.

Additional proof that there are risks associated with the Narrabri Gas Project are:

Landholders have been advised by their insurers that their farm businesses, the associated water resources and farm produce are considered "uninsurable" against Coal Seam Gas contamination. Recently Australia's largest insurer IAG and its subsidiaries WFI and CGU, confirmed that public liability cover will not be available to farms that host Coal Seam Gas activities after 2023.

Furthermore Santos have stated publicly during the filming of the SBS Insight programme in Narrabri [***When Coal Seam Gas Comes Knocking-a Town Divided***] that they cannot guarantee their Narrabri Gas Project will not damage the Great Artesian Basin, when asked this question.

This is probably why the Chief Scientist's 2014, recommendation 9, requiring enhanced insurance coverage to ensure financial protection short and long term for the coal seam gas industry has not been implemented after nearly 6 years.

**If the world's greatest risk takers, the Insurance Companies, and Santos, won't provide insurance against these risks then why should communities and landholders have to?**

**For this reason alone the project should not be approved.**

Page 4 of the Executive Summary states: *'any residual impacts of the project can be **reduced to an acceptable level** by capping total water extraction to 37.5 gigalitres over the life of the project'*

This is not a cap to **reduce** impacts **to an acceptable level**; it is exactly the volume of water Santos need to extract over the life of the project as described in their EIS.

Who is going to measure the water that will be extracted and how will it be measured?

Given the track record of resource companies a modification to this cap would be requested if the cap needed to be lifted.

Page 14 of the Executive Summary: trivialises the volume of salts that the project will produce by comparing it with the 500,000 tonnes of salt produced each year by the Murray Darling Basin Authority.

Also during the IPC meeting with Santos Mr N Fox States: **'we anticipate the project will remove 47.5 tonnes of salt per day from the environment'**

**Give us a break: how can bringing up this salt from between 500 to 1,200 meters underground be removing it from the environment ?**

He then goes on to talk about the salt produced by the Murray Darling Basin Authority without mentioning the benefits of this process.

The truth is

Interception of salt before it enters the river system will reduce salinity in the river, improve its environmental health and improve water quality for users, particularly irrigators which will have significant economic benefits. In addition approx 20,000 tonnes is harvested annually; this salt is used beneficially for the production of table salt and several other products. Salts from the Narrabri Gas Project are not wanted and are an additional problem with potential for negative impacts if not contained safely.

Estimates of the volume of salts to be produced by the Narrabri Gas Project were originally 430,000 tonnes and are now expected to be 840,000 tonnes depending on the expected life of the project. These salts need to be disposed of and according to Page 14 of the Department of Planning Executive Summary this can be done at one of the 11 licensed waste facilities within 150 kilometres of the site. Compared with the salts from the Murray Darling Basin, the salts from the Narrabri Gas Project have no economic benefit and it seems that nobody wants them. This includes the Narrabri Shire Council despite the fact it has declared its support for the project. Some shires within this 150 kilometres radius such as Moree, Coonamble, and Coonabarabran are strongly opposed to coal seam gas and therefore less likely to accept the disposal of salts in their waste facilities. Santos has for years spruiked the idea of investigating options for the beneficial use of this salt. Yet Santos has had 9 years to prepare a strategy for the disposal of these salts but have failed to do so.

**It should also be noted that over the life of the project a total of approx 11,400 tonnes of these salts will have been deposited on irrigation lands and into Bohena Creek. Is this really removing salt from the environment?**

**[Ref: Calculated from information in Appendix G2, Concept irrigation design Page 28. Santos EIS].**

The Executive Summary comments on building social licence on Page 18 and again on Page 7 downplaying the overwhelming opposition to the project.

To do this both Santos and the Assessment Report mention that ***'over 70% of the submissions were form submissions'***. This was in reference to the results of submissions to the Santos EIS counted by the Department of Planning and Environment where 98% of 22,949 submissions opposed the Narrabri Gas Project. At the Santos 2020 Annual General Meeting the Chairman Keith Spence went on to calculate that the majority 58 % of submitters in the Narrabri area support the project.

Santos's desperation to create an illusion of a social licence to operate has lead them to dismiss the validity and clearly expressed views of the majority of Narrabri People and an extraordinary 22,639 submissions when the wider community is included.

Of the 296 supporting submissions, the Department of Planning's executive summary failed to mention the **supportive** submissions also included some **form** submissions. If support submissions were in the majority and they contained a large number of **form** submissions then would they have been trivialised?

When focusing on the Local Narrabri area submissions the Executive Summary attempts to paint a positive view by saying '**although a breakdown of submissions from the local area shows a broader spectrum with nearly 37% of these submissions supporting the project**'

A more accurate comment would have been '**of the 499 submissions from the Local Narrabri Area 319 (64%) objected to the project and 180 (36%) supported the project. Therefore those who object to the project outnumber those who support it by two to one**'. When the wider community is included those who object compared to those who support the project blows out to over nine to one against.

Attached are results of eight polls or surveys that support the fact that the majority oppose the Santos Narrabri Gas Project. I urge you to ask any pro gas speaker who claims the opposite what proof they have?

Executive Summary states on Page 6: "That it requires the approval of the Commonwealth minister for the Environment in addition to any State Approvals". That's cold comfort to say the least.

Firstly: the Commonwealth Government recently set up the National COVID Coordination Commission which includes several members with strong links to the gas industry. It was set up to advise the Prime Minister's Office on a gas led economic recovery post the Corona Virus pandemic.

Why set up this Commission when the Prime Minister's Office would have been receiving the same advice from the gas companies? Possibly to give the impression it was at arm's length from the gas industry.

Secondly: The Commonwealth Government has entered into a Memorandum of Understanding with the NSW Berejiklian State Government to provide them with a \$2 billion energy deal which will require NSW to free up gas for domestic use. Ms Berejiklian said the gas supply hinges on final approvals for the Santos Narrabri Gas Project.

Thirdly: The Federal Government has failed in its duty to protect the environment in its delivery of Australia's national conservation laws, a scathing review by the National Auditor General has found. Ref: The Guardian June 2020.

Under these circumstances I cannot imagine the Commonwealth minister deciding not to approve the Narrabri Gas Project.

On Pages 10 and 11 the Executive Summary describes the shortage of gas and the need to put downward pressure on prices. Sadly it does not acknowledge the central role Santos played in creating these circumstances that it claims the Narrabri Gas Project will help alleviate, or the fact that Santos's decision to export gas has been responsible for the **loss of more jobs** than they could ever create with this Project.

There is a far better options **if we need more gas**, and one is to import gas, **as bizarre as this may sound, as Australia is the biggest exporter of gas in the world.** This will eliminate the majority of the negative impacts that need to be 'reduced and minimised.'

Santos would disapprove, but this is the consequence of having made a decision to build the second LNG train without having enough gas to feed it.

The import terminal at Port Kembla has been approved and has the capacity to supply more gas than the Santos Project.

It will cost \$250 million (AFR June 2020) and will connect into existing pipelines. In comparison the Santos Narrabri Gas Project will cost \$3.6 billion(The Guardian June 2020) and that is before they have a pipeline to distribute the gas. With this sort of investment Santos would prefer to delay the transition to renewable energy so as to recoup its investment.

Domestic gas prices are now linked to the International export price so it is highly unlikely Santos can put downward pressure on gas prices unless they are subsidised-or would they want to!

The Department's Assessment Report claims the Narrabri Gas Project will provide '*additional supplies*' of gas and '*put downward pressure on prices*' but this is at odds with information provided by Santos which makes it clear that '**it was assumed that the project did not add to total gas supply at a national level**' Furthermore, Santos clarifies, '**it was assumed that the project itself did not drive change to gas market prices**'. [Ref: DPIE. June 2020. Assessment Report, Appendix H2-B Attachment 1, Response to BAE Economics questions on the Narrabri Gas Project, Page 5].

Even AGL says the Narrabri coal seam gas project won't ease pressure on prices. Ref: The Sydney Morning Herald July 2019.

The only way you are going to get downward pressure on prices is by Government intervention (a gas reservation policy), and new **suppliers**. This is a sentiment expressed by the then Incitec Pivot CEO James Fazzino, who chose to invest \$1 billion in a new plant, not in Australia but in Louisiana, and created a couple of thousand jobs. Ref: The Australian, October 2017.

**So the gas import terminal is the logical solution as we transition to renewables.**

It can supply more gas than the Santos project.

Competition is more likely to put downward pressure on prices.

The many negative impacts associated with the Narrabri Gas Project are avoided.

The final sentence of the Executive Summary states: '**On BALANCE the Department has concluded that the project is in the PUBLIC INTEREST and is approvable subject to strict conditions'**

On **balance** the opposite is true. The **public interest** would be better served if the project was not approved because of the benefits provided by the import option and because the overwhelming majority of the public oppose the project.

These few examples show how weak and unconvincing the Departments of Planning's assessment report is. For these reasons the IPC has a moral and democratic obligation to reject this project.

Thank You

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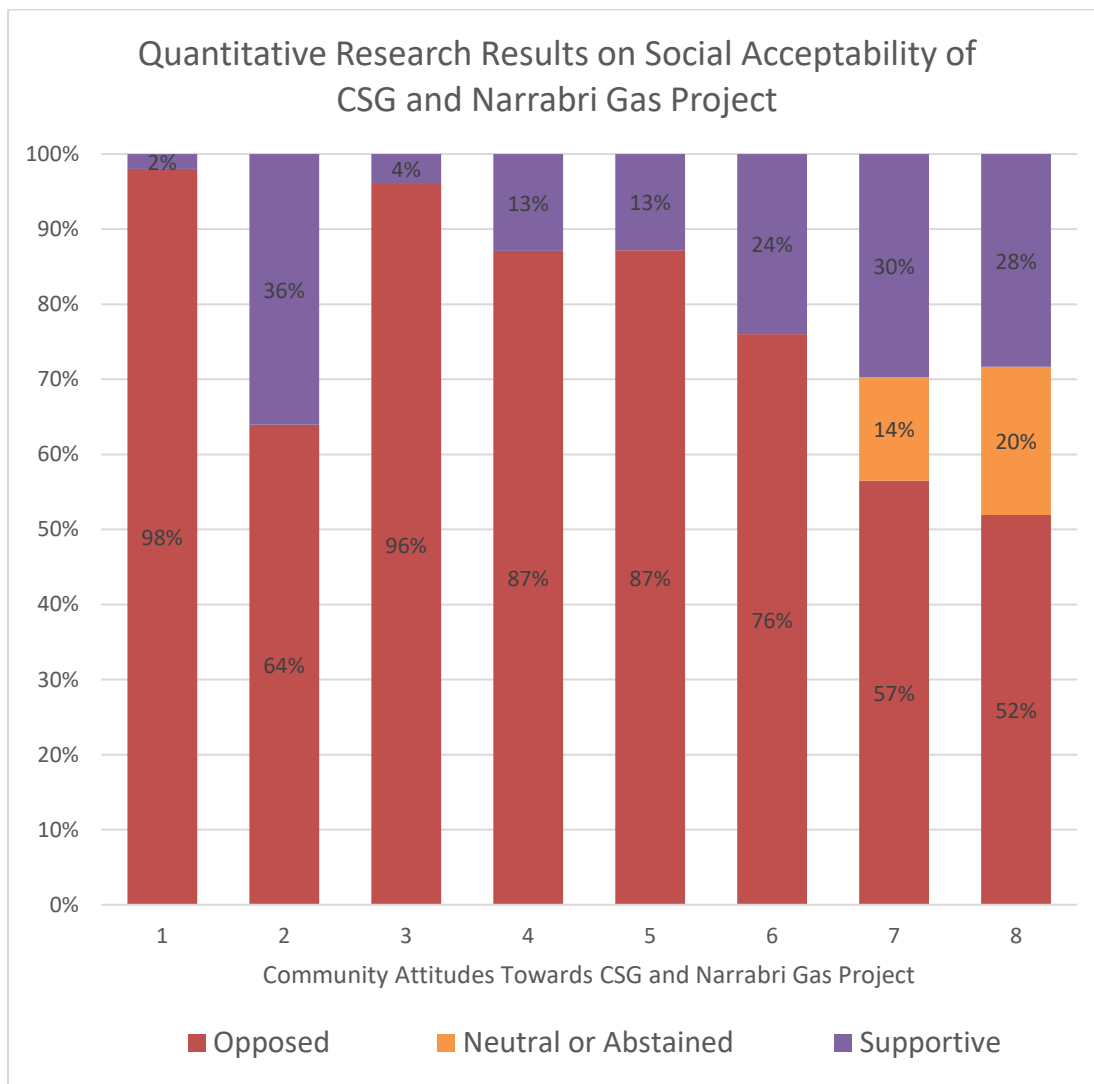
## Part One – Quantitative Data Proving No Social Acceptance of The Proposed Narrabri Gas Project

Numerous surveys have been undertaken over the past five years to assess whether the Narrabri Gas Project has "community acceptance". The results of all surveys show that the project is roundly opposed by the residents of Narrabri Shire and the surrounding region.

The proposed Narrabri Gas Project is the most contentious State Significant development in the history of NSW as evidenced by the almost 23,000 written submissions in response to an open call for public responses to Santos' Environmental Impact Statement (EIS) for the project.

Much controversy has surrounded and continues to surround the project.

People for the Plains is a locally based group of Narrabri Shire residents who have sought to gain a comprehensive understanding of the processes surrounding coal and coal seam gas (CSG) developments, and the impacts of those processes. As part of the wider community, the group has long realised that the project does not have strong community support. This paper analyses all the quantifiable data (survey results) that we have been able to access, to see what the numbers actually say. These results have been graphed, as follows.



The graph shows the eight sets of survey results (note some data sets are different aspects of the same survey) undertaken over the last five years. The following table shows when and where each of the sets of survey results was taken from, and the size of the sample.

No.	Survey Name	Date of Results	Sample Geographical Area	Sample Size
1	EIS Public Submissions (Total)	May 2018	Open to all areas	22,949
2	EIS Public Submissions (Narrabri Shire postcodes Only)	May 2018	Only those in local postcodes (determined by Dept of Planning)	499
3	Lock the Gate Community Surveys	Over the last 5 years	North West NSW Communities	7,024 over 106 communities
4	Reachtel Q4 (Barwon)	17/03/2015	Barwon Electorate Residents	681
5	Reachtel Q2 (Tamworth)	12/03/2015	Tamworth Electorate Residents	686
6	Fairfax Online Survey (7/2/17)	7/02/2017	The Land on-line readers	2,224
7	GISERA Survey	29/05/2018	Narrabri Shire Residents	400
8	North West Alliance Narrabri Town Survey	November 2018	Narrabri Town Residents	839

Each set of survey results are based on different questions and provided different options for answers. However, our analysis has grouped the answers to provide a direct comparison between those answers that either indicate support for, or objection to, the proposed Narrabri Gas Project, or no opinion (where this option was provided). The table below sets out what questions were used for each of the survey results and how the answers were grouped for the use in the graph above.

No.	Question Asked	Negative	Neutral of Abstained	Positive
1	When providing written submission, tick box for support or object to the project proposal	Object (98%)	NA	Support (2%)
2	When providing written submission, tick box for support or object to the project proposal	Object (64%)	NA	Support (36%)
3	Do you want your road/street to remain gasfield free?	Yes (96%)	NA	No (4%)
4	How concerned are you about the risks posed to water supplies and food-growing areas from coal seam gas mining in NSW?	Very concerned and Somewhat concerned (87%)	NA	Not At All concerned (13%)
5	How concerned are you about the risks posed to water supplies and food-growing areas from coal seam gas mining in NSW?	Very concerned and Somewhat concerned (87%)	NA	Not At All concerned (13%)
6	Do you want CSG production at Narrabri?	No (76%)	NA	Yes (24%)
7	Q44 Overall, which best describes your attitude towards this CSG development in the Narrabri Shire. I would:	Reject it, Tolerate it (57%)	Be ok with it (14%)	Embrace it, Approve of It (30%)
8	Do you support the Narrabri Gas Project?	No (52%)	Abstain, don't know (20%)	Yes (28%)

Views have been expressed in the local media, largely from vested interests, that the project carries “strong community support”. However, the eight sets of survey results from the area, and graphed in the figure above, clearly show that the opposite is true.

Support for the project ranged from 2% to 36%. On the other hand, opposition to the project and CSG ranged from 52% to 98%, depending on the set of survey results.

In summary, this is a highly controversial project with vested interests intent on swaying opinion on how “the community” feels about it. This quantitative data shows that, no matter how the data is analysed, the proposed Narrabri Gas Project has only limited support and a high level of opposition.

#### References for each of the Survey Results

No.	Reference
1	All submissions in response to the EIS can be found on the NSW Department of Planning and Environment’s NSW Planning Portal at <a href="https://www.planningportal.nsw.gov.au/major-projects/project/10716">https://www.planningportal.nsw.gov.au/major-projects/project/10716</a>
2	<b>Attachment One</b> – letter from Department of Planning and Environment outlining correct numbers of submissions
3	Results for Australia-wide surveys held by Lock the Gate – north west results
4	<b>Attachment Two</b> – Reachtel Barwon Survey results
5	<a href="https://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/1853/attachments/original/1426560819/Lock_the_gate_-_11_March_2015_-_Tamworth_COAL_CSG.pdf?1426560819">https://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/1853/attachments/original/1426560819/Lock_the_gate_-_11_March_2015_-_Tamworth_COAL_CSG.pdf?1426560819</a>
6	<a href="https://www.theland.com.au/story/4450300/peeling-back-the-layers-narrabri-csg-poll/">https://www.theland.com.au/story/4450300/peeling-back-the-layers-narrabri-csg-poll/</a>
7	<a href="https://gisera.csiro.au/wp-content/uploads/2018/03/Social-7-Phase-3-Report-1.pdf">Community wellbeing and social attitudes to coal seam gas development, Social baseline assessment: Narrabri project – Phase 3 survey report https://gisera.csiro.au/wp-content/uploads/2018/03/Social-7-Phase-3-Report-1.pdf</a> Page 80 – raw data results
8	<a href="https://www.theland.com.au/story/6302272/definition-of-independent-not-up-for-debate/">https://www.theland.com.au/story/6302272/definition-of-independent-not-up-for-debate/</a>

## Part Two – Those Who Say There is Social Acceptance of the Narrabri Gas Project

Over many years the Narrabri community has been subjected to a well-resourced, orchestrated and deliberate process by a range of vested interests to create social acceptance of the proposed Narrabri Gas Project.

According to the CSIRO, an operation is said to have a social licence when it achieves ongoing acceptance or approval from the local community and other stakeholders who can affect its profitability. Even the Minerals Council of Australia describes a social licence to operate as an unwritten social contract. It goes on to say *“unless a company earns that licence, and maintains it on the basis of good performance on the ground, and community trust, there will undoubtedly be negative implications”*.

We have seen evidence of the importance of social licence when in 2014 NSW State Government Minister Anthony Roberts announced that Metgasco’s gas production licence at Bentley on the NSW north coast would be suspended due to “insufficient community consultation”. The fact was that Metgasco did not have a social licence to operate in the area, with massive local protest. Eventually, Metgasco was paid \$25 million as compensation for its cancelled gas licence.

A social licence is a critical component to be considered by consent authorities when evaluating a project.

There are numerous examples of where false and misleading information has been provided about the social acceptability of the proposed Narrabri Gas Project (our underlining added):

- Peter Mitchley, (then) Santos Energy NSW General Manager: “we ... have a social licence to proceed“(with the proposed NGP, Northern Daily Leader 28/2/2014). **Attachment Three.**
- Russell Stewart, Chair of Narrabri Chamber of Commerce in a letter read out to the Upper House of the federal Parliament by then National Party Senator John Williams: “... the vast majority in the Narrabri Shire is pro Santos”. (You Tube <https://www.youtube.com/watch?reload=9&v=Fbt2NGqUziQ>, Published 22/2/2016)
- Louise Tout, Chair of Yes 2 Gas “A quick chat amongst a few people became an overwhelming vote of support” (full page ad in the Narrabri local newspaper The Courier, Annual Review, December 2016). **Attachment Four.**
- Kevin Humphries, State Member for Barwon at the time: “... that the vast majority of people want this project to proceed” (The Courier, Letter to the Editor, 28/2/2017). **Attachment Five.**
- Kevin Gallagher, Managing Director and CEO of Santos, in Santos Environmental Impact Statement Foreword:” Santos has gained a strong level of support within the broader Narrabri community” and “The majority of the Narrabri community recognise that the expansion of this relatively new industry can improve the prosperity of the local area.” This is a subjective opinion by the company which is unsubstantiated. (<https://www.planningportal.nsw.gov.au/major-projects/project/10716> submitted March 2017)
- Yes 2 Gas advertisement: “300 local submissions received in support of the project” (Advertisement in The Courier, Annual Review December 2017) There were 499 local submissions, of which only 180 were in support of the project and 319 against. **Attachment Six.**



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- Hon Don Harwin, then NSW Minister for Energy and Utilities and Minister for Resources told Parliament: “There is *extremely strong* support for the Santos-Narrabri Gas Project in the town of Narrabri.” (<https://youtu.be/lmO0vqOFsE4> 16/5/2018)
- Despite two letters sent to Hon Don Harwin on 16/5/18 and 18/11/18 pointing out the quantitative data available at the time, the record has still not been set straight.