

Submission to the IPC very strongly objecting to the proposed Santos Narrabri Gas Project

1. I am an urban resident of the inner Western Sydney suburb of Petersham. I consider myself to have a direct interest in the question of whether or not this Project should be approved or disapproved, mainly on the ground that I am an Australian citizen. As such I firmly believe that I owe a duty of care to future generations of Australians with respect to guarding and preserving the natural resources of this country. This duty includes protecting those natural resources from the depredations of private corporations while in pursuit of profits in the short term for their shareholders.
2. In 1976 I studied and sat for the NSW Higher School Certificate. I attained results good enough to comfortably qualify for university entrance. One of my HSC subjects was physical geography and while I cannot claim expertise in that subject, I have distinct memories of having learned that it was very well established and accepted that Australia is the driest inhabited continent on earth, of the great importance that ground water has always had for its inhabitants, and of some of the features pertaining to the Great Artesian Basin (GAB). Among these were that the GAB is the largest artesian basin in the world, that it is vast, that it underlies several Australian states and territories, that it is the only source of fresh water there is for a great deal of inland Australia, and that it took millions and millions of years for the GAB to form.
3. When it came to my attention quite recently that Santos proposes to sink more than 800 wells into the GAB in the Narrabri area for the purpose of extracting coal seam gas, I was astounded. My initial thoughts were that either: (a) my memories of the importance of ground water and the GAB to Australians as taught to me are badly faulty; (b) that my information about the intentions of Santos must be incorrect; or (c) that technological and scientific advances in the field of mining since 1976 must have been so remarkably successful that such activities by Santos would pose no threat whatever to those large numbers of Australians who are dependent for their lives and livelihoods on the waters of the GAB, to say nothing of the population of Narrabri and surrounds.
4. I began some research with the object of finding which, if any, of my initial conclusions (3 (a), (b) or (c) above) was correct. I turned, as I suspect most Australians would these days, to the internet. I was quickly relieved to discover that there was nothing wrong with my memory with respect to ground water and the GAB. That my information about the intentions of Santos was broadly correct, and that there have most definitely not been advances in the field of mining of the kind I speculated about in 3 (c) above, and in fact there seems to be an extraordinary degree of opposition to the proposed Santos Project from the population of Narrabri itself and surrounds. All of this information was readily available to me on the internet, therefore I make the presumption that it is well known to you gentlemen, who form the IPC.
5. Talking of “form”, as I understand matters, it took approximately **250 million years** (give or take a few million either way) for the GAB to form. I am unable to quote precise figures as to how many Australian primary producers are directly dependent upon the GAB for their produce, but I am very sure it is a highly significant number. Once I had absorbed this (to me) new information, I began to wonder about what rational motivation any Australian government, federal, state or territorial, could possibly have for taking any risk whatever with a natural asset that had taken aeons to form. I had no immediate and satisfactory answer to that question. In order to attempt to find one, I resolved to watch and listen to as much as I could of the public hearing concerning the Santos Narrabri Gas Project.

6. From 20 July to 1 August 2020 I watched and listened to a very large proportion of the public hearing. Subsequent to that I read a very great proportion of the transcript of that hearing. I would like to respectfully offer my congratulations to the commissioners for the manner in which they have, thus far, conducted themselves in performing their onerous task. I would also like to respectfully offer my professional admiration to Mr Beasley for the manner in which he discharged his duties. Above all, I wish to express my dumbfounded admiration for the overwhelmingly excellent quality of the contributions of the majority of the objectors to the Project. At times they brought tears to my eyes, but what stood out consistently was: their sincerity; their eloquence; the effort obviously put in to the research they had done; and their common sense.

7. Turning my mind to the assessment report prepared by the Department of Planning, Industry and Environment, I regret to say that I have not yet had the opportunity to read that report in anything like the depth it obviously requires. However, I have now heard a great number of apparently cogent criticisms of that report from a great number of people who obviously have read it in depth. Also, I did see and hear Mr Kitto of the Department address the Commission, and I have since carefully read transcript of Mr Kitto's address. In doing so I was surprised to find the number of times my own marginal notes indicate that I found references to matters that: are clearly uncertain; imprecise to the point of vagueness; in the process of being done but not actually done; not even in the process of being done but that Santos is "committed" to doing; clearly call upon the reader to be wildly optimistic and to place in Santos as much faith as the average religious maniac places in his or her own particular deity. On the other hand, I was amazed (and amused) to find the following (starting at line 23, P-10 of Transcript, Day 1):

"One of the things the department has found difficult to reconcile is the significant community concerns about the project with the technical advice from experts and the findings of its own detailed assessment of any – that the -that the risk of any significant impacts occurring is generally low and can – can be controlled using standard engineering practice and strict conditions"

While I would imagine that the designers of the Titanic might have expressed similar sentiments prior to hearing about the iceberg, Mr Kitto then went on to speculate about possible reasons for what he had called the "*significant opposition to gas development in general in New South Wales*" (line 30, P-9 Transcript, Day 1) including the public having been alerted to actual impacts of coal seam gas in other jurisdictions. This patronising attitude displayed by the DPIE did nothing to persuade me of the Department's omnipotent wisdom when it comes to taking risks with the GAB, and I am sure the same would apply to the significant numbers of primary producers in Narrabri and environs who are acutely aware that they live and work in a re-charge zone for the GAB.

8. I did of course see and hear the presentation made to the Commission by Mr Gallagher of Santos. I do not wish to be offensive, but I do feel compelled to state my mind. I found Mr Gallagher's self-serving presentation to be riddled with dubious non-scientific propositions and statements, misrepresentations, half truths, and outright lies. I think I am quoting Mandy Rice-Davies when I say: He would say that, wouldn't he?

9. I now wish to return to the puzzle I posed in 5 above. The question, simply stated, is: why would anyone in their right mind wish to subject a natural asset which has sustained flora and fauna (including human beings) in untold numbers for thousands of years, which is unique and took 250 million years to form, to treatment which **could** result in severely damaging, and/or poisoning it? To my mind if ever there has been a case to fully engage the precautionary principle, this is it, and it follows that the IPC should refuse this development application. If there is one thing we should

have learned from human history it is that from time to time, even with the best of intentions (and unfortunately I find myself unable to credit Santos with the best of intentions) the plans of humans go catastrophically wrong. This intended project poses an unacceptable threat to the GAB.

10. Having followed these IPC proceedings as carefully as I was able, I believe I now have arrived at a rational answer to the question of what might motivate any Australian government to take risks with the GAB. In my opinion that answer is captured in two words: money; power. Australian governments are made up of politicians. The great majority of Australian politicians are members of particular parties, and as we all know the major parties (Liberal, Labor and National) are the regular beneficiaries of large sums of money donated to them by the fossil fuel industry. I understand that Santos is one of those regular donors. I am not suggesting that individual politicians personally profit from such donations, but I am suggesting that individual political parties are heavily influenced by such donations in relation to the policies they adopt or advocate for in seeking to achieve or retain political power. I am also suggesting that those political parties in pursuit of power sometimes forget, or are blinded to, their duty to the public who put them in their current positions of power. While I am firmly of the view that our Australian democratic institutions have been badly eroded over the last thirty to forty years or so, I am encouraged to see that they have remained sufficiently robust so as to have resulted in the establishment of this Independent Planning Commission by the New South Wales Government. I am now placing my faith in the integrity of your Commission and in it being truly independent.

11. I have largely confined this submission to the question of possible risks to the GAB because that was the matter which first drew my attention to the deliberations of this Commission, and one I thought I might know a tiny bit about. As you are well aware, there are a large number of other grounds upon which grave objections to this Project have been made: e.g. toxic waste disposal; ecologically sustainable development; biodiversity management; public liability insurance; climate change – the complete list would be very long indeed. There is also a long list of objectors who spoke far more eloquently and expertly about these and other matters than I ever could, and I wish to place on record my general support for all of those objectors.

12. Finally, I respectfully urge this Commission to refuse consent for this development application.

Yours sincerely

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