



28 July 2020

Office of the Chief Executive Officer

Reference File: F05736 - 20/152268

Office of the Independent Planning Commission NSW  
Level 3, 201 Elizabeth Street  
SYDNEY NSW 2000

Dear Sir/Madam,

**SUBJECT                    Blue Mountains City Council Submission Regarding the  
                                  Narrabri Gas Project**

At the ordinary meeting of the Council of the City of Blue Mountains on 30 June 2020, the Council resolved:

1. *That Council notes that:*
  - i. *The NSW and the Federal governments recently signed a deal in which NSW will receive over \$2 billion for energy projects on the condition they are gas.*
  - ii. *That there have been CSG exploration and drilling licenses in the Blue Mountains that could be revived.*
  - iii. *The Council strongly opposes Coal Seam Gas exploration and production in or near the Mountains and has created an information page on its website to expound this. [Council Meetings 14 May 2013 (Item 11), 27 November 2012 (Matter of Urgency), 6 November 2012 (Matter of Urgency), 18 August 2009 (Item 25)]*
  - iv. *Council has declared a climate emergency which cannot be addressed if fossil fuels continue to be Australia and the world's main power source.*
  - v. *The technology and natural resources exist for Australia to be 100 per cent renewable now.*
  - vi. *The Federal and NSW government should be advancing renewable energy not fossil fuels as an essential response to climate change.*
  - vii. *The proposed duplication of the highway from Katoomba to Lithgow to consolidate the Great Western Highway as the main freight route with the West, suitable for B-doubles up to 30m, means the Highway would be a freight corridor for infrastructure construction and contaminated waste to and from CSG fields.*
  - viii. *This month the NSW government endorsed its Planning Department's recommendations that Santos' Narrabri coal seam gas project at Narrabri be approved and has referred it to the Independent Planning Commission for a decision within a 12 week period.*

- ix. *There is no social licence for this project as there were 23,000 public submissions regarding its Environmental Impact Statement with around 98% opposed.*
  - x. *The project spans 95,000 acres of the Pilliga Forest and surrounding farmland and will drill into a significant recharge zone of the Great Artesian Basin on which farming and ecosystems rely.*
  - xi. *Santos will be licensed to extract 4 million litres a day for 20 years in a massive drain on groundwater.*
  - xii. *There would be a significant risk of contamination of aquifers, the Great Artesian Basin and the land.*
  - xiii. *Salt waste is expected to amount to 840,000 tonnes over the lifetime of the project and no disposal solution had been identified to prevent salinization of soil.*
  - xiv. *As renewable energy is the fastest growing energy sector worldwide, it is likely that the Government will ultimately have to bail out Santos as has happened with oil and gas companies in the USA.*
  - xv. *Insurance companies' have recently refused to provide public liability and farm insurance to landholders arising from the risk of a spill or gas infrastructure failure.*
  - xvi. *The project may destroy 1,000 hectares of koala habitat which has already been dramatically reduced in NSW by bushfires and logging.*
2. *That the Council makes a submission to the Independent Planning Commission on the Santos Narrabri Coal Seam Gas project noting these and any other relevant matters; and*
  3. *That the Council encourages members of the community to also make submissions opposing the Narrabri project.*

[Minute no. 195]

This letter therefore represents a submission from Blue Mountains City Council (Council) in relation to the Narrabri Gas state significant development project.

Council is part of a growing number of councils that have taken the step of declaring that a climate emergency is occurring. In 2018 the Intergovernmental Panel on Climate Change warned that there is less than 12 years to reduce global CO<sub>2</sub> emissions by at least 50% or face irreversible damage to our planet.

The required reduction in emissions will never be achieved if fossil fuels continue to be both Australia's and the world's main power source. Council believes that the technology and natural resources exist for Australia to be 100 per cent renewable now and that the Federal and NSW governments should be advancing renewable energy, not fossil fuels, as an essential response to climate change. Council strongly supports a green renewable energy lead as part of the COVID-19 recovery.

Council believes there is a real risk that CSG projects such as the Narrabri gas project will become a future liability for the state of NSW as they become stranded assets. With renewable energy being the fastest growing energy sector worldwide, and with decarbonising of our economies an increasing imperative in the face of dangerous climate change, there is a real risk that the NSW Government will ultimately be forced to bail out CSG companies such as Santos as has happened recently with oil and gas companies in the USA.

In addition to contributing negatively to Australia's climate change response, the Narrabri gas project will result in significant environmental impacts including the destruction of up to 1,000 hectares of the Pilliga forest. The Pilliga is the largest continuous remnant of semi-arid to temperate woodland in NSW. Santos' proposal will cause significant fragmentation within the forest, including impacts on the 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.

The fact that the project has been recommended to proceed despite a currently undetermined threat to the indigenous heritage of the Pilliga region is also a cause of concern. In the light of the recent destruction of significant aboriginal cultural heritage sites by Rio Tinto, providing approval for a resource extraction project before a complete cultural heritage impact assessment has been undertaken would seem to be both highly insensitive and inadvisable.

The Narrabri gas project also threatens the living heritage of Gamilaraay peoples. The proposed approach taken by Santos to site its facilities with the intention of avoiding "*areas of high cultural heritage value to local Aboriginal groups*" fails to understand the landscape scale connection to Country and the holistic responsibility as protectors of Country that is intrinsic to Gamilaraay culture. The Santos proposal to undertake detailed surveys after it gets approval and then to avoid newly found sites of high significance, is a highly risky strategy.

CSG projects such as the Narrabri Gas Project also represent a significant threat to the Australia's vital agricultural sector. The Narrabri gas project will drill into a significant recharge zone of the Great Artesian Basin, on which farming and ecosystems rely. Santos will be licensed to extract 4 million litres of water a day for 20 years, creating a massive drain on groundwater resources. Associated, salt waste is expected to amount to 840,000 tonnes over the lifetime of the project and no disposal solution had been identified to prevent salinisation of soils.

Council is highly concerned that approval of this project would set dangerous precedent for further exploration and drilling licenses in the Blue Mountains LGA, and in areas adjacent to the Greater Blue Mountains World Heritage Area. Council continues to be strongly opposed to the granting of any exploration or production licences for CSG in the broader Blue Mountains region.

In conclusion Council would like to express its strong opposition to the Narrabri Gas project for a variety of reasons including:

- The significant environmental impacts on the biodiversity and water resources of the Pilliga region arising from the project.
- The undetermined risk to significant indigenous heritage sites in the Pilliga region which should be assessed before the project is considered for approval.
- The significant contributions that gas extraction projects such as the Narrabri Gas Project will make to Australia's greenhouse emissions which are contributing to environmentally damaging climate change, which Council believes should be addressed as a climate emergency.
- Concerns that the Narrabri Gas Project will be the test case for reversing bans of CSG exploration across areas where it was previously prohibited, including the Blue Mountains and surrounding areas of the Greater Blue Mountains World Heritage Area.

I thank you for the opportunity to provide comment on these matters. Should you require any further information or clarification, please contact us via [council@bmcc.nsw.gov.au](mailto:council@bmcc.nsw.gov.au).

Yours faithfully

A handwritten signature in dark ink, appearing to read 'R. Dillon', with a long horizontal flourish extending to the right.

ROSEMARY DILLON  
Chief Executive Officer