

To: The NSW Independent Planning Commission Panel for the Narrabri Gas Project

The submissions provided to the IPC provide overwhelming justification to reject this project, based on direct (local/regional) environmental and social risks.

I would like to address a different issue – the poor governance inherent to this planning process.

Please reject this application because its just wrong to go ahead with this project in isolation from a credible national decarbonisation plan that puts public interest including inter-generational equity, ahead of vested political and commercial interests. I humbly ask you to consider the bigger picture of our future energy, economics and environment. Please think beyond this gasfield – important though it is

The IPC has been charged with the decision about one specific proposal, the Narrabri Gas Plan (NGP).

This is a deeply flawed approach and I am asking the commissioners to point this out very clearly. If you feel you are unable to do this because you are bounded by the restrictions of your terms of reference then I ask you to consider your duty as professionals.

Energy management is fundamental to our well-being. Energy is broadly a state responsibility, but grids have become inter-connected and a National Energy Market operates. Moreover, the Federal government intervenes on a regular basis in terms of policy and investments. For example, NSW has planned large scale Renewable Energy Zones but the infrastructure for these needs Federal funds. Access to these has been tied to NSW increasing its gas supply.

This is all in the context that Australia has no national energy strategy. The good news is that the states and feds have recognised this at COAG meetings and set up the Energy Security Board to develop a national approach. However, the energy ministers now meet under national cabinet rules under which the agenda and deliberations are secret and the ESB is excluded.

This background should convince the commissioners that a narrow, localised or even state, focus on the NGP is flawed, given the overall poor governance of Australia's energy system. Until there is a robust plan to fix this on an accelerated timescale, it would be highly inappropriate to sign off on a gasfield development on the basis of perceived energy management needs of NSW.

Other poor energy governance we have inherited is a grid not fit for purpose. Faulty government policies caused massive mis-investment – gold-plating a grid designed for yesterday not tomorrow. We have also inherited a gas production industry that is not fit for purpose – mostly exported into a flooded market and yet still inflating domestic prices and incorrectly stated as unable to meet NSW gas needs.

Commissioners, you have the opportunity to put a stop to this downward spiral of criminal stupidity. History shows that if you only pay lip service to these overarching issues then you may as well not bother. Please note your predecessor IPC in 2014 – they were charged with deciding on the exploratory drilling at Narrabri, but recognised broader concerns and commented on what should be taken into account in assessing future projects. None of this is even mentioned in this Assessment.

In making a decision about decision about one specific proposal, the Narrabri Gas Plan (NGP), the IPC is to assess the Assessment Report by the NSW Department.

The onus is on the IPC to critique this document. This is a fundamentally flawed approach when the assessment represents the government bending over backwards to support the proponent, rather than being a balanced analysis considering the well-being of the local, state-wide and Australian communities.

As an example, let me share just the example of Salt Management, which I referred to in my presentation on day 5 of your hearings¹.

¹ IPC MEETING 24.7.20 p-87 quotes me “Just read the top management brush off is one example”, where “top” should read “salt”

This is dealt with in 11 paragraphs, including:

394. To further illustrate the predicted salt volume, the WEP notes that the total volume over the 25-year project would be equivalent to the volume of a large aircraft hangar. In comparison, the Department notes that the Murray Darling Basin Authority's salt interception scheme generates about 500,000 tonnes of salt per year. (WEP = Water Expert Panel)

The WEP, just like the IPC, is charged with assessing a localised project and yet chooses to insert statistics about an unrelated source of salt generation from the MDB, which covers one-third of Australia. This misleading and gratuitous statement alone demonstrates the tenet of this process - to trivialise the concerns of the community.

399. The Department agrees and has recommended conditions requiring Santos to investigate beneficial use options for the salt product. It has also recommended conditions requiring Santos to comply with a number of performance measures in relation to salt management, and to prepare and implement a detailed Salt Management Plan

After years of preparation and planning for the NGP and years of experience of developing similar gasfields elsewhere, Santos are empty-handed in terms of real solutions for the salt issue. The doubling of salt load (p392) is mentioned in passing as if unimportant. Yet p399 states this is all to be addressed sometime in the future by a "Salt Management Plan".

With all of Santos' experience, the only indications given for salt disposal in p 396-398 are the number of licenced landfills within reach and some vague ideas of starting a sodium bicarbonate industry. This clearly demonstrates an unbalanced and undemocratic level of trust in the proponents versus very real environmental concerns of the public.

Gerard McEvelly

10th August 2020