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Subject: Narrabri Gas Project Submission to the IPC
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Submission to the IPC on the Narrabri Gas Project
AGAINST THE PROJECT

Tom Walker

I am a 60 year old farmer on the Western Slopes Pipeline route where it crosses the Macquarie River at Warren.

I have had experience with Planning (Social, Environmental and Economic) Macquarie Floodplain Management Plan Western Slopes Pipeline Community Consultation Committee.

The media's constant repetition of unsubstantiated claims by industry and Government does not somehow make them accurate. Now there is increased access to independent, credible information from highly qualified sources in recent years with help from natural disasters there has been a dramatic shift in public opinion against projects such this. The Narrabri Gas Project has seen unprecedented public interest with acute awareness of the risks and a mistrust of any claimed benefits. There is no going back. The Department's Assessment Report does not add clarity but instead raises more questions than it answers. There is little public confidence in the entire process.

FLAWS

The Department's Assessment Report

Riddled with ambiguous Subjective Terminology. Particularly in key areas (example unlikely to be significant).

Inadequate Data That is outdated "cherry picked" missing not local.

Acceptance of untested claims assumptions and assurances. Shifting onus of proof away from Santos.

Over reliance on desk top modelling fed by inadequate data with subsequent low predictability value and high degree of inaccuracy.

Understated risks overstated benefits.

Have evaluated risk separately and proportionate to size of project. Rather than cumulative.

Assumed any damage will be incremental and therefore allowing time for adaptive response, and assumes any remedial actions will work.

The department assumes it already knows where and how to locate intensive future modelling to get improved relevant data.

Failed to invoke "Precautionary Principle" "not significant enough risk". Insult to public expectations and undermines credibility of entire report. Conveniently by passes sufficient scrutiny and undermines public confidence.

Ignores Inter-Generational Equity concerns, risks to Biosecurity and water.

Community Consultation flawed. Characterised by misrepresentation, misinformation, withheld or delayed access to information, and avoidance of concerned stakeholders.

Power Imbalance has also led to claimed intimidation and bullying of vulnerable by Santos and Government, example by withholding funding.

Assurances rather than practical operational plans ready to be implemented in regard to Heritage, Fire, Insurance, Biosecurity, Processed Water, Salt and Underground Water.

WATER

Assumes level of knowledge that does not exist in regard to:

Impact of Depressurising

Degree of drawdown

Interconnection, conductivity and faults between stratum.

Ability to find, treat and minimise contamination.

BIODIVERSITY

Seriously inadequate fieldwork and needs to be done before not during or after project starts
Ignores impact of recent fires and that Australia leads the world in species loss and extinction rates.

Fails to address fragmentation issues, diminishing capacity as major refuge and highest order landscape.

Ignored repeated claims offsets will not work.

Ignores contribution farming already making and associated opportunity costs. For example investment on hold, food and water security risk, compromising work to date, for example cap and bore scheme. Potential loss of land value and erosion of rights.

No accounting for unstoppable shift to renewables already cost competitive and with huge potential and opportunities in regional areas. For example Renewable Energy Zones.

Although Pipelines are a prerequisite, somehow, their cost and impact have been completely ignored at this time. This despite already claiming them as a crucial benefit from this project.

Legacy issues unknown despite fact all wells fail at some time a case of not if but when. May be short term project but department happy to accept as satisfactory that any issues will not become apparent for years.

REGULATION AND COMPLIANCE

Very little detail. Responsibility passed to EPA as Lead Regulator, which flies in face of Chief Scientist key recommendations, notably new independent skilled and adequately resourced body to be set up.

No contingency fund in place.

No clear monitoring measures in place to ensure transparent and thorough ongoing governance of project.

Over reliance on Santos to provide further data when “reasonable, feasible” or deemed “necessary” or “required”.

Absence of significant penalties that act as meaningful deterrent for non compliance.

CREDIBILITY OF CLAIMED BENEFITS?

Use of gas as transitional fuel is already past.

Now under question as could be as dirty as coal especially with methane leakage.

Reliance on sensitivity testing to avoid dirtiest Carbon Dioxide wells just assume 10% 0.2% emissions lacks all credibility even by industry standards.

No new fossil fuel projects to meet agreements and

Narrabri gas deal and dirtier than Surat Basin.

Already talking down potential of Narrabri Gas Project to reduce gas price.

Domestic shortage is by manipulation or market. There are alternatives.

Narrabri Gas not locally available and therefore cheaper ignores need for and cost of pipeline.

Renewables with storage already cost effective alternative.

Gas glut, demand decreasing. Gas can be sourced elsewhere or shifted from residential to industrial.

Australia domestic gas security mechanism always available as backup.

Take investment away from future options

Risk stranded asset and Government bailout required to make project viable

Surprisingly poor argument to support project figures do not stack up and claimed benefits fail scrutiny.

SUMMARY

Assumption based and lacks scientific rigour. Department Assessment failed duty of care to community.

High Degree of Uncertainty remains with many unanswered questions.

Reliance on adaptive management being realistic and workable.

Ignores track record of Santos and Government to safely manage and protect resources.

Completely lacks social licence and situation is getting worse not better as claimed.

Illogical for this to gain approval

Should be overwhelmingly rejected