

My submission is **against this project** and for the purpose of this response I am going to focus on the koala population in the Pilliga that are poised to be impacted both directly, and indirectly, by Santos' gas mining project.

As a start, I request the Commissioners urgently heed and reconcile the introductory statement in this section about the evaluations of the local koalas by the Applicant with reality:

"The Koala and potential habitat were assessed and described in detail in the NGP EIS."

They have referred you back to their EIS – an environmental impact study undertaken over 4 years ago – before the worst of the drought, and the Black Summer of mega-fires – a study that is accompanied by this alarming Disclaimer:

*'This document may only be used for the purpose for which it was commissioned and in accordance with the contract between Eco Logical Australia PTY LTD and Santos NSW (Eastern) PTY LTD. The scope of services was defined in consultation with Santos NSW (Eastern) Pty LTD, by time and budgetary constraints imposed by the client, and the availability of reports and other data on the subject area. Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information.'*

*Eco Logical Australia PTY LTD accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting party by any third party. Information provided is not intended to be a substitute for site specific assessment or legal advice in relation to any manner. Unauthorised use of this report in any form is prohibited.'*

So let's break down what this disclaimer reveals about this EIS Santos have so confidently referred you to:

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- So, Santos is **the Client** – and Eco Logical Australia PTY LTD **are PAID BY Santos** to produce a report for them...
  - I ask the Commissioners: **Is this client/supplier dynamic EVER going to produce a truly objective report when the paying party in this relationship is relying on a specific outcome from the report to pave the way for their project?**

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- Time/Cost/Quality: I work in the service business and I am only too aware of how restrictions to one of these levers impacts the others. **'time and budgetary constraints imposed by the client'** This is a clear admission that must surely alarm the Commissioners as to what, if any, value this report, has to the people of NSW to protect our water, forests and wildlife from the impacts of this project? My conclusion is that this EIS is incomplete and by deduction, the presentations to the IPC Hearing by Ecologists and others with respect to

evidence of the biodiversity of the Pilliga and the impact of this project to the koalas must be heeded.

*Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information.*

- This supports my request that we must now take into account the 'up to date information' on the current state of our national koala population based on the impact to the species by the ongoing drought and finally the mega fires last summer. A four year old EIS commissioned and paid for by the applicant must not be your guide on this matter.

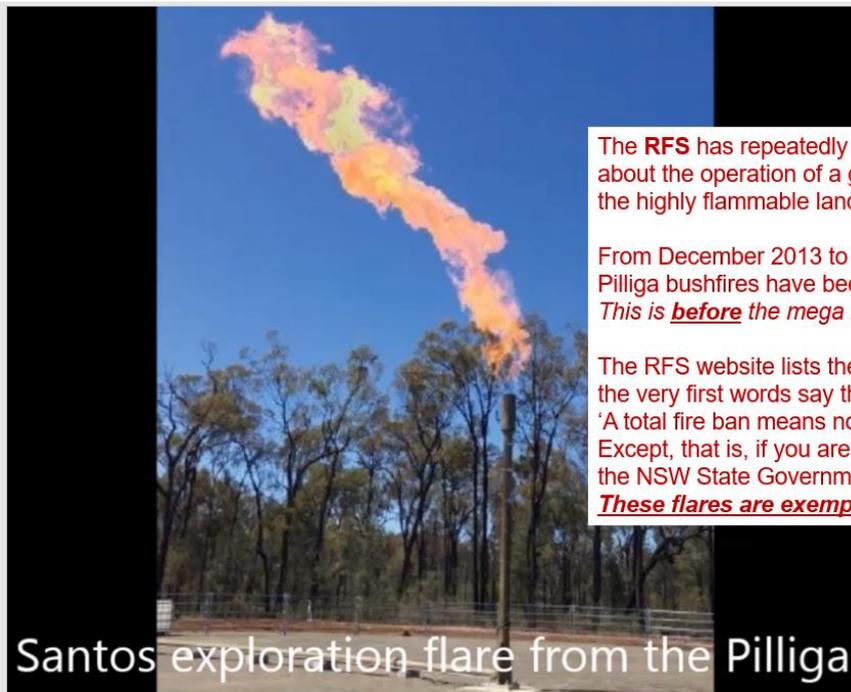
*Eco Logical Australia PTY LTD accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting party by any third party.*

- There you go: 'no liability or responsibility whatsoever' I propose that this is absolute proof that this EIS is a box ticking exercise only and offers no guidance that can be relied upon for decision making by the Commissioners in relation to this project. I suggest this failure of process goes right to the top of our Planning Department in NSW where this challenge to leverage the EIS to obtain genuine information on the state of our environment and the true projected impacts of any development, especially this one, is deeply flawed.

The recent final submission by Santos also states:

“The north-east Pilliga (including the Project area) has been surveyed for Koalas at various times, including during periods when the Koala populations in the Pilliga were considered to have been at historical peaks. Very few koalas have ever been found in the north-east Pilliga. The vast majority of Koala records are in the central and western Pilliga, areas supported by more productive soils, fewer fires, and greater access to permanent water along major drainage lines.”

The issue with this statement is that they claim the koala doesn't travel into the corner of the Pilliga Forest earmarked for the project, but as we saw over last Summer, fires do travel – and now in our hotter drier climate (exacerbated, ironically, by the extraction and burning of carbon based fuels like the gas Santos is pursuing with this project) – the fires have propensity to become mega blazes that devastate entire forests in a matter of days. Last summer fires were recorded travelling as fast as 60 kilometres an hour. To propose that the koalas in the central and western Pilliga are safe from the impacts of gas mining in the north-east Pilliga is delusional; the argument used in this follow up submission is flawed as it is myopically focused on localised activity but fails to account for regional consequences.



The **RFS** has repeatedly expressed serious concerns about the operation of a gasfield and its burning **flares** in the highly flammable landscape of the Pilliga.

From December 2013 to January 2018, at least 17 Pilliga bushfires have been recorded.

*This is **before** the mega bushfire season of 19/20*

The RFS website lists the rules around total fire bans; the very first words say this:

*'A total fire ban means no fires out in the open.'*

Except, that is, if you are a CSG company supported by the NSW State Government.

***These flares are exempt from total fire bans.***

Santos exploration flare from the Pilliga

All it could take to devastate this rare inland temperate forest is one leaf to blow through a gas flare from a well in the north-east Pilliga; a fire started this way would put the central and western Pilliga at risk – along with the resident koala populations in those areas of forest.

Koala's are our internationally beloved 'bear', a high-profile native species, that we have shamefully driven to the brink of extinction since 'settlement'. In the absence of urgent, significant and meaningful planning decisions to protect them, the extinction of the koala is now predicted to occur within our lifetimes. This extinction event we are bearing witness to has been accelerated by the fires across the Eastern seaboard last Summer which are calculated to have killed many as 10,000 koalas – a third of New South Wales' total population. <https://www.abc.net.au/news/2020-02-18/ten-thousand-koalas-could-have-died-nsw-bushfires/11975378>

Your decision on this project, if you approve it, could turn out to be judged by history as a tipping point in their final demise.

I urge you not to fall for the Applicants claims of assurance based on a flimsy and out-of-date Environmental Impact Study. This recent and final submission by Santos also claims: "All surveys of the Koala in recent times (for the Pilliga) have highlighted that population has been declining and this is acknowledged in the NGP EIS."

- Note 'recent times' is not dated – so what period are they referring to?
- They are continuing to reference the NGP EIS that was conducted in 2016!

So if this local population, in our last inland Temperate Forest in NSW, is documented as 'recently declining'; however in the past, this same submission admits that this forest has been demonstrated to support populations of koala that were "increasing from the early 1980s until the late 1990s (van Kempen 1997, Kavanagh and Barrott 2001)" then we need to heed the previously scientifically published proof that this forest is an ecosystem that sustains koala populations, yet with the impacts of climate change it is now delicately and precariously in balance so **we must protect it, not plunder it with this proposed gas field.**

Putting one section of the forest at risk (a 'sacrifice zone') with this gas mine, also does not reconcile with an approach that protects the integrity of not only the local koala population, but the significance of this group of koalas to the overall survival of the species.

Then Santos have aimed to defend their ecological destructive plans in this zone with the promise of biological 'offsets'.

*"Offsets requirements for the Project were calculated in accordance with the Framework for Biodiversity Assessment for all residual impacts on biodiversity values (ecosystem and species credits), following avoid, minimise and mitigate principles as outlined in the NGP EIS."*

Note that **these calculations are based on an EIS that is dated November 2016!!** The Commissioners cannot use this as the basis for their decision on the impact of this project on koala populations, **a report that is almost four years old** and does not account for the drought, or the very real impact of the recent fires that burned much as 30 per cent of koala habitat state-wide, putting the endangered species further at risk of extinction.

The offset scheme is well recognised as woefully inadequate to protect species, and viable areas to be preserved as 'offset' are diminishing day by day in a State where we have witnessed unprecedented rates of deforestation in recent years – with a particularly devastating impact on our koala populations: <https://www.wwf.org.au/news/news/2018/nsw-s-20-deforestation-hotspots-exposed-17-with-koala-habitat#gs.du1xec>

Instead I urge the Commissioners to assess the *cumulative impacts*, combined with the *poor integrity of the NGP EIS report* given the cosy client/vendor relationship between the Applicant (Santos) and the report writers. And then, keeping in mind the information presented at the hearing by ecologists and others on the frontline of protecting our precious and diminishing biodiversity, you must make a ruling.

For these reasons, I reject, as I hope you do, any claims by Santos based on this final submission which references its deeply compromised EIS, that our beloved Koalas are safe from the impacts of this project.

They are not.

The ecologists who presented to the hearing know this.

You know this.

We know that you know this.

So I implore you to please rule on this knowledge accordingly and REJECT the application for this project.

With concern,

Julia Walsh