

**SUBMISSION TO THE INDEPENDENT PLANNING COMMISSION ON THE
NARRABRI GAS PROJECT SSD 6456**

21 August 2020.

I wish to lodge the following comments OPPOSING approval of the Project.

Comments are confined to points made in the Department's "Response to IPC Questions."

No new material of any significance has been provided. The Department has ignored or disregarded submissions concerning the many possible negative aspects of the Project.

. **ESD** A point made by the Dept. to claim justification and avoid responsibility.

" as Santos would be liable for meeting all the costs associated with avoiding and/or minimising the impacts of the project, with monitoring and reporting on its environmental performance during operations, and with fully rehabilitating the site following operations."

Santos has just recorded a half-year loss of more than \$400 million, and has written down the value of assets by up to \$1.1 billion in July. To trust that Santos will be in a position to afford the cost of managing damage control and the rehabilitation of the site is fanciful at best. Santos CEO Kevin Gallagher states Santos "is a low-cost producer". Surely this indicates that saving on the cost of ensuring safe operating procedures will be a priority.

The Precautionary Principle

"While there is some scientific uncertainty" and "due to limited information available ". These are typical phrases used by the Dept. in its response, but it has not provided any further evidence that these concerns have been addressed. At the same time the Dept. claims speakers at the hearing failed to provide evidence of what damage could occur.

Intergenerational Equity

"Several speakers at the public hearings claimed the Narrabri Gas Project was contrary to the principle of intergenerational equity because there should be no new extraction and use of fossil fuels, or because the cumulative greenhouse gas emissions (scope 1, 2 and 3 emissions) of the project would exceed the carbon budget approach to climate stabilisation and contribute to

unacceptable impacts on the global climate, which would have adverse effects on current and future generations “ and

“Climate change is a critical global issue requiring urgent action, and the success of this action will be essential for ensuring intergenerational equity.”

The Dept. states the Project is approved in line with Government policy on limiting greenhouse gas emissions. Complying with a policy to NOT limit greenhouse gas emissions is not difficult.

Chief Scientist and Engineer Review

“Responding to “ , is not implementing recommendations .

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