



Environmental Defenders Office

21 August 2020

Steve O'Connor
Panel Chair, Narrabri Gas Project
Independent Planning Commission

CC: Casey Joshua, Planner

By email: ipcn@ipcn.nsw.gov.au

Dear Mr O'Connor,

Narrabri Gas Project (Project) - Supplementary independent expert reports in relation to new information received from Santos Ltd (Applicant) and the Department of Planning, Industry and Environment (DPIE)

1. We confirm we act for North West Alliance in relation to the Project.
2. We refer to the Commission's statement on 14 August 2020, which opened public comment on:
 - a. the document entitled 'Submission to IPC following public hearing' (including its attachments) provided by the Applicant on 10 August 2020 (**Applicant's Submission**); and
 - b. the Department's 'Response to Independent Planning Commission Questions' provided to the Commission on 14 August 2020 (**DPIE Response**).
3. In response to the Applicant's Submission and the DPIE Response, we enclose supplementary expert reports prepared by the following independent experts engaged by EDO on behalf of NWA:
 - a. Associate Professor Matthew Currell – Groundwater impacts;
 - b. Dr Alistair Davey – Economics;
 - c. Professor Penny D Sackett – Climate change;
 - d. Dr Alison Ziller – Social impacts;
 - e. Mr David Paull – Terrestrial ecology; and
 - f. Dr Peter Serov – Aquatic and Groundwater Dependent Ecosystems.
4. NWA wishes to record its disappointment that on 10 August 2020, the final day for submissions to the public hearing (before the Commission reopened public comment), the Applicant submitted a substantially different economic assessment to that previously submitted as part of its environmental impact statement and subsequently discussed during the public hearing. The Applicant's Submission was provided to the Commission without prior notice to members of the NSW public and in a manner that was procedurally unfair for all objectors who gave evidence during the public hearing. In any case, the evidence NWA has previously submitted to the Commission, and the supplementary expert report of Dr Alistair Davey, evidences that there is no demonstrated economic need for the Project.
5. Moreover, we note that due to the constrained timeframe for NWA to respond to the Applicant's Submission and the DPIE Response in light of the deadline for public comment set by the Commission, if the supplementary expert reports do not address a point raised in either the Applicant's Submissions or the DPIE Response, it should not be taken to mean that NWA concedes that point.

6. NWA submits that neither the Applicant's Submission nor the DPIE Response have altered NWA's position that there is no demonstrated need for the Project, the Project is not in the public interest, and the Project is contrary to the principles of ecologically sustainable development.
7. NWA reiterates its request that IPC refuse development consent to the Project.

Yours sincerely,

Environmental Defenders Office

A handwritten signature in black ink, appearing to read 'Elaine Johnson', with a long horizontal flourish extending to the right.

Elaine Johnson

Principal Lawyer

Reference number: 1724807