

Submission on additional material submitted by Santos and DPIE following public hearings.

I urge you to reject the proposed Narrabri Gas Project.

The additional submissions by Santos and DPIE do not add anything substantial to the body of knowledge surrounding this proposed development. They have, in effect, simply restated their position on a number of aspects.

Neither Santos nor DPIE have adequately addressed the concerns addressed by presenters in the public hearings.

In particular, they have not addressed the concerns and criticisms presented by numerous expert presenters.

Having watched and/or listened to as much of the public hearings as possible, I am convinced that there are no experts who support the project except for those paid by Santos or retained by DPIE. As far as I can recall, every expert presenter, other than those retained by Santos or DPIE, had concerns about the project and urged that it be rejected.

There is a message here!

The overwhelming community response, whether local or remote, is in opposition to the project.

There is a message here!

DPIE has not adequately addressed issues of Ecologically Sustainable Development in its consideration of the project.

DPIE refers to preconditions for the application of the precautionary principle as being:

1. Threat of serious or (ir)reversible environmental damage; and
2. Scientific uncertainty as to the nature and scope of the threat of environmental damage.

After listening to the expert presenters at the public hearings on Thursday 23 July it became very apparent that both of those pre-conditions had, despite the opinion of the DPIE, been met.

Expert presenters made repeated references to scientific uncertainty in relation to the geological structures beneath the Pilliga and to the connectivity and behaviour of water in the aquifers. Repeated references were made to the risk of serious and irreversible damage to the Great Artesian Basin and other, more local, aquifers.

Even the DPIE has now acknowledged that there is no shortage of gas in NSW and that gas produced through the Narrabri Gas Project will not be "cheap gas".

All that this gas will do is to replace gas currently supplied from interstate so that gas can be sent to the LNG terminal at Gladstone for export.

The DPIE submission also refers to the recommendations of the NSW Chief Scientist and Engineer in 2014. In a number of instances, they have arbitrarily stated that the recommendation does not apply.

This is just not good enough.

It is my contention that, until all the recommendations have been implemented then there should not be any approvals granted for any CSG (or unconventional gas) projects in NSW.

Either the recommendations are required to ensure the safety of the industry or they are not.

If the Chief Scientist has said that the recommendations should be put in place, then I would rather take their word than that of DPIE.

In the additional submission by Santos all they do is state that they disagree with presenters who opposed the project in the public hearings. That Santos claim a presenter was in error does not make it so.

They have also failed to adequately address concerns raised in relation to salt waste, both in terms of the quantum and the contaminants contained within it.

The proposed "beneficial reuse options" to which Santos refers are by no means assured. Even they acknowledge that their prospects are uncertain at best.

Despite what Santos or the DPIE may claim, there is no "social licence" for this project. The overwhelming majority of community-based (rather than expert) submissions, both in writing and at the public hearings, have opposed the project.

For all of these reasons, I urge you again to reject the Narrabri Gas Project.

It is not wanted.

It is not needed.

It is not justified on social, scientific or economic grounds.

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