

**Submission to the Independent Planning Commission
Re Narrabri Gas Project
21 August 2020**

Dear Commissioners

Thank you for this final opportunity to comment on material submitted to you by Santos and the DPIE after the public hearing days.

While there are still a plethora of issues inadequately addressed by Santos, we would like to focus on just four.

Firstly, Santos' impact on biodiversity in a pristine, publicly-owned, remnant of our Australian bushland has not been adequately addressed. There are endangered and vulnerable species present and no offsets adequately protect the integrity of these species. This is explicitly stated in the Interim Report June 2020, by Professor Graeme Samuel AC conducting the Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Offsets don't work!!

Secondly, as shown in the Australian Competition & Consumer Commission's Gas Inquiry 2017-2025 Interim Report July 2020, there are regular inconsistencies in the gas industry, from variations in price between domestic and exported gas, variations between previously predicted supply to actual (previously over estimated, more recently under estimated) and predictions of usage. The current Interim Report, while suggesting a possible medium term shortage, does not strongly advocate new local fields be developed; rather in the recommendations the focus is on competitive pricing and that *'Governments consider whether further measures are needed to ensure that north-south transportation infrastructure or import terminal investment on the east coast occurs in time to avoid potential supply shortfalls'*.

Thirdly, the ongoing risk to groundwater. Surely, the precautionary principle must be invoked here to protect groundwater for future generations living in this country. Model predictions vary widely. The lack of confidence in the known data re faults and fissures and lack of capacity to predict future land movements makes this whole project untenable. How can impacts be *'be adequately managed through monitoring and adaptive management as prescribed in the recommended conditions of consent which allow for early detection of drawdown effects in the Gunnedah Basin'*, when the groundwater monitoring system is deemed by the DPIE to be inadequate?

And finally, the impact of this project on climate change. CSG is no better than coal when it comes to climate changing emissions (BP report). Moving from coal-fired power stations to CSG-generated electricity for base load is not an ecological-friendly way to go. And Santos is not honest here providing the full picture. Santos cites modelling for the *World Energy Outlook 2018* indicating that under its "Sustainable Development Scenario," global gas demand grows by 14 per cent by 2040 compared to 2016. Santos fails to mention that growth in gas demand since 2016 has already exceeded this amount! The WEO 2018's Sustainable Development Scenario would see gas demand *contract* on 2018 levels by 3.4%.

The WEO 2018 clearly states that “A three-way race is underway among coal, natural gas and renewables to provide power and heat to Asia’s fast-growing economies.” And of course, this argument inevitable leads to jobs...jobs in rural areas vs jobs in industrial settings.

We wish you well with your considerations of this high contentious project. We believe there is only one alternative which properly serves the local, state, national and global needs and expectations. Expectations of people now and the future generations to come. This project must be given the red flag and ended now.

Thank you for your consideration,

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