

Submission on Santos additional information in response to public hearings.

Santos claim in Salt Waste P18:

“The average volume of salt produced annually by the Project would be a very small proportion of the overall capacity of any one such facility.”

This is a very generic statement. They do not specify the amount of salt waste each year. They have not accounted for all of the potential toxic chemicals remaining in the salt waste. They have not quantified the capacity of each of the possible landfill locations or what quantities would be going to which locations.

They leave all this to be worked out “on the fly” or more realistically “on the never never”.

They have not answered the criticism made by one expert presenter that the NSW EPA 2014 NSW Waste Classification Guidelines did not envisage disposal of large quantities of contaminated salt from CSG operations? They also do not answer the criticism from that same expert presenter that the salt will dissolve in major rain events releasing toxic chemicals into the surrounding landfill soil.

Disposing of the salt waste in landfill only shifts the problem to somebody else.

Santos, once again, is trying to pass the buck ...

The likely chemical contaminants in the salts pose a health risk to the environment and to people.

The salts disposed of in landfill will dissolve when it rains releasing the chemicals and placing additional strain on the landfill barriers.

To state, as Santos does, that “General solid wastes leach both organic and inorganic substances” is an insult to the intelligence of the community and the Commission.

It ignores the highly toxic nature of some of the likely chemical contaminants of the salt waste.

Exploration of “beneficial use opportunities” is pie in the sky. There is no assurance that the proposed uses are viable or sustainable. If there were suitable, viable and economic beneficial use opportunities then surely the owners of CSG operations in Queensland would have explored and exploited them by now.

The amount of salt waste is now expected to be around 800,000 tonnes over the life of the project.

Concentration of the salt waste in certain geographic areas places additional strains and pressure on the facilities and the local environment.

Transport of the salt waste is also an issue that places all communities along the route at increased risk.

This will increase the levels of contaminants in addition to the salt to be disposed of or treated.

Has Santos checked with local councils that oversee the waste disposal facilities to make sure they are happy to take the waste? Has there been consultation with local communities in which the

landfills are located and along the routes the waste must travel to see whether they are happy about the waste travelling through or into their communities?

I suspect that the answer to both questions is a resounding No!

There are still, and will remain, too many unknowns.

I urge you to reject the proposed development.

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