



Franciscan Friars
Provincial Office

Province of the Holy Spirit
incorporating
Custody of St Anthony
Region of St Andrew
www.franciscans.org.au
Association of the Franciscan Order of Friars Minor ABN 63 004 232 633

Australia
Malaysia Singapore Brunei
Aotearoa - New Zealand

Franciscan Provincial Office
47 Victoria Street Waverley NSW 2024 Australia
Tel (02) 9369 9300 + 61 2 9369 9300
Fax (02) 9369 9322 + 61 2 9369 9322

Mining and Industry Projects
Department of Planning
GPO Box 39
SYDNEY NSW 2001
Tel: (02) 9228 6111
Fax: (02) 9228 6455
Email: plan_comment@planning.nsw.gov.au

Attention: Mr Clay Preshaw

Re: Submission on the proposed Camden Gas Project - Northern Expansion (Stage 3)
Project Application 09_0048

Dear Sir,

On behalf of the *Association of the Franciscan Order of Friars Minor*, (the Franciscan Friars), I object to AGL's Project Application 09_0048 to mine for coal seam gas (CSG) in Campbelltown and Camden. The key reasons for my objection and that of the Franciscan Order, owner of land in the affected area, are stated below.

1. CSG mining is a technologically-evolving industry whose impacts have not been independently and scientifically fully researched and remain largely unknown.

This view is supported by professional organisations and academics in evidence to the NSW Upper House and Senate Inquiries into Coal Seam Gas Mining in 2011 and by subsequent research here and overseas. We have had to rely on the industry for much of our information when the industry has a vested interest in one outcome. AGL is no different. It claims that the Camden Gas Project has been safely operating for 10 years. Yet during that time, scientifically valid monitoring of groundwater and air has not been conducted and though AGL has been operating under an Environmental Protection Licence (EPL No. 12003), it has also been allowed to self-monitor its compliance, self-investigate incidents and self-report, such that we do not know what true impacts it may have had.

Third party consultants and external laboratories that are engaged and paid for by the industry are not independent. Nor is any funded or co-funded research by the CSG mining industry. The National Water Commission in its Position Statement (3rd December 2010) said that impacts may not be known for up to thirty years. Along with many other concerned citizens, we Franciscan Friars fear that the costs of unforeseen environmental problems will be borne by the community and taxpayers after AGL is long gone from the area. This is grossly irresponsible.

2. Doctors for the Environment Australia www.dea.org.au claims that health impacts from CSG mining have not been assessed.

In 2010, Doctors for the Environment Australia first raised concerns about the potential health impacts of coal seam gas mining in Australia. They detailed their concerns in a submission to the Senate: *Submission to the Rural Affairs and Transport References Committee Inquiry into management of the Murray Darling Basin – impact of mining coal seam gas*, 27th June 2011, and to the NSW Parliament: *Submission 412: Inquiry into Coal Seam Gas*, 16th Sept 2011. Please see:

[http://dea.org.au/images/uploads/submissions/MDB CSG Senate submission June 2011.pdf](http://dea.org.au/images/uploads/submissions/MDB_CSG_Senate_submission_June_2011.pdf) and <http://www.parliament.nsw.gov.au/prod/parlament/committee.nsf/0/f96d076732225603ca25791b00102098/%24FILE/Submission%200412.pdf>

The fundamental public health issue is the potential for water contamination by chemicals which could seriously affect human health decades after exposure. Health impacts may arise from the use of fracking chemicals or from the release of hydrocarbons and other contaminants from the coal seams. Pollutants – particularly volatile organic compounds – may be released into the air at the well head. In the United States, control measures determined by the US EPA in response to elevated levels of pollutants measured in several gas fields will be phased in by January 2015.

In Tara, Queensland, it seems possible that the high recorded levels of fugitive methane may also reflect the presence of pollutants which are causing illness in local communities eg. a number of Tara residents have been reporting symptoms such as headaches, rashes, nausea and vomiting, nose bleeds and eye and throat irritation. The cause of these symptoms is unknown but investigation of health complaints can be very difficult in the absence of a significant investment in comprehensive environmental monitoring. Similar symptoms are under investigation by the US EPA.

Early research from Queensland (eg. by Southern Cross University in Tara) and overseas is deeply concerning, especially where fracking has been used. As at December 2011, 85% of the production wells in the Camden Gas Project had been fracked (evidence from the NSW Upper House Inquiry) with inadequate monitoring of its impacts. AGL claims that the use of horizontal wells in the proposed Stage 3 will reduce the need for fracking, but it seems that this is not entirely true since it has reserved the right to frack these wells in the future if/when the technology becomes available. The size of the proposed well clusters and any fracking of horizontal wells are both new and untested here. It will therefore be entirely experimental with unknown outcomes on health and property including the possibility of subsidence under so many urban properties.

3. I am also concerned about evidence from Queensland and overseas on air quality, and the cumulative impact of AGL's expansion into an area that already experiences incidents of unacceptable levels of air pollution (ozone and fine particles) associated with respiratory problems (NSW Environmental Protection Authority).

AGL's past performance gives no confidence that it has not already contributed to this level of air pollution or that it can be managed in the future, having admitted in July this year that it had not conducted continuous air monitoring at its Rosalind Park Gas Treatment Plant for three years in breach of its EPL No.12003.

4. Allowing CSG mining in areas that are not zoned for heavy industry undermines zoning controls and confidence in the planning process, and creates severe land use conflicts, economic instability and inequity.

Examples of the impact in the Camden-Campbelltown area of undermining zoning controls by allowing CSG mining include:

(i) the disruption of religious communities such as ours and several others which fall within the bounds of the Camden Gas Project Stage 3. Up till now, the Scenic Hills and Campbelltown City Council zoning has protected our use of this land in ways consistent with our religious vocations and our service to the many people from all over the Sydney region who have attended religious celebrations on our properties over many decades and who continue to do so. Should the several water bodies on our properties become contaminated as a result of CSG mining, this will create further and unacceptable risk to not only the residents of these properties but to the many visitors who use them.

For example, the Stations of the Cross on our property of "Maryfields" located at 168 Narellan Rd, Campbelltown is currently Heritage listed in the Local Environmental Plan (Gazette No. 48, Page 1049). These Stations attract many visitors (including children) for religious celebrations and are in close proximity to several water bodies that are easily accessible by these visitors.

(ii) the placing of an undue burden on small rural allotments whose capacity to cope is severely reduced by size, thereby threatening the survival of the entire historic Scenic Hills.

(iii) the creation of an unsightly and unsafe living environment in urban areas with a potential escalation in CSG mining incidents and accidents associated with the more intense urban activity (traffic, people etc.), the presence of children, and potential for vandalism.

(iv) the likely devastating impact on land and house values for existing land and home owners. For many people, the home is their largest asset and is often leveraged to support small business. Any devaluation by bank assessors may destroy livelihoods and life savings. This should be of concern in any neighbourhood but particularly so in the Campbelltown-Camden area which has a significant proportion of young families and lower income households.

5. The NSW Government's new regulations for CSG mining will not ensure its safe operation here.

AGL's Project Application 09_0048 has been transitioned from the former Part 3A assessment system into the State Significant Development (SSD) assessment system under Part 4 of the EP&A Act. However, as the only commercially producing CSG field in NSW, the Camden Gas Project has already been operating under consent conditions. Yet the NSW Government has not been able to ensure compliance, as evidenced by ongoing breaches by AGL of its licence conditions, and the discovery of incidents that might not have been reported were it not for community vigilance, such as the Sugarloaf well incident in May 2011 in Menangle near Campbelltown that also affected Sydney's water channel and nearby houses.

6. AGL's proposal poses risks to Sydney's water in general and to the South West in particular that have not been adequately assessed.

While AGL claims that the *geology of the Sydney Basin is well known*, AGL's rationale for the constant modification of prior stages of the Camden Gas Project contradicts this, as does its admission to the Scenic Hills Association that it does not know where the aquifers here run to but *probably Sydney Harbour*. Potential impacts on Sydney Harbour, on the nearby Sydney Water Catchment, and AGL's proposal to run its gas gathering pipeline along Sydney's Upper Canal on public land are unacceptable risks to Sydney's water, and are an abuse of public property for the benefit of private investors.

Conclusion

AGL will only ever supply 5% of NSW's gas from the Camden Gas Project according to evidence it gave under oath at the NSW Upper House Inquiry. The risks and potential costs to the community do not justify this, particularly since over 150,000 people already live and work in the immediate affected area, and this is Sydney's south west growth corridor.

Therefore, I wish to strongly submit that AGL's proposed Northern Expansion of the Camden Gas Project (Project Application 09_0048) is socially, environmentally and economically unjustified, and AGL has no social licence to operate here.

I acknowledge that my name will appear on my submission when publicly exhibited.

Yours sincerely,

Name	Fr Paul Smith OFM, Provincial Minister, on behalf of the <i>Association of the Franciscan Order of Friars Minor</i> ABN 63 004 232 633
Business Address	47 Victoria St Waverley, NSW 2024
Affected Property Address	168 Narellan Rd, Campbelltown, NSW 2560
Signature	<i>Paul Smith OFM</i>
Date	December 17 th 2012