



Blue Mountains Bird Observers Inc.

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Executive Director, Resource Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Submission: Objecting to the Narrabri Coal Seam Gas Project

Dear Director

Blue Mountains Bird Observers Inc (BMBO) is a community-based organisation whose main objectives are to encourage birdwatching, knowledge about and appreciation of birds, and to promote the conservation and protection of native birds and their habitat. The club has over 180 members.

While our club is based in the Blue Mountains in the Greater Sydney Area, members have interests, including property ownership, in other Areas such as Central Tablelands (Capertee Valley and Cowra) and travel on club trips and individually to most parts of New South Wales and other parts of Australia. We are affiliated with BirdLife Australia and maintain close links with a large number of groups in New South Wales through the Bird Interest Group Network.

Many members are actively involved in maintenance and restoration of native bird habitat, both privately on their own properties and through Bushcare and Landcare activities. BMBO conducts regular surveys in dozens of locations under the **Key Biodiversity Area** (KBA) umbrella, specifically for Rockwarbler habitat and Honeyeater migration pathways.

BMBO is therefore intimately concerned with any potential for reduction in bird habitat, particularly but not exclusively relating to threatened species.

Background

Addressing our concerns with the proposed Santos Coal Seam Gas project in The Pilliga, we note the presence in the target area of a number of threatened bird species. The Pilliga was listed as an Important Bird Area under international covenant, and this has recently been upgraded to the current **Key Biodiversity Area** listing. Threatened or seriously declining woodland bird species that breed in or migrate through the Pilliga area include: Rainbow Bee-eater, Barking Owl, Regent Honeyeater, Swift Parrot, Diamond Firetail, Hooded Robin, Speckled Warbler and Great Egret. The Pilliga is a major refuge resource for these and other less-threatened bird species and key Australian Fauna species. It should be noted that

the endangered Mallee Fowl is already extinct in the Pilliga, but could be revived with suitable effort and maintenance of habitat.

Specific Objections to this Project

1. Damage to Biodiversity:

The Pilliga is the largest remaining temperate woodland in New South Wales. Santos propose clearing nearly 1,000ha of the Pilliga, including habitat for critically endangered Regent honeyeater and for koalas, which are already in decline in the Pilliga. The segmented nature of this clearing will fragment much larger areas of habitat, so affecting an area an order of magnitude larger than the proposed clearing. The gasfield will clear breeding habitat for **Pilliga Mouse**, which **lives only in the Pilliga**, and breeding habitat for other wildlife. It will fragment and degrade the forest. Without specific information about where the wells and lines will be located, a proper ecological impact assessment can't be completed. Regardless, the Pilliga is a cherished natural and cultural icon and must be protected from becoming an industrial gasfield.

2. Making the ecosystem in the area even harder for native wildlife, **Air Quality** will also be degraded. The air quality assessment fails to include health-damaging fine particulate pollution with a diameter of 2.5 microns or less (known as PM2.5). With diesel generators at each well pad and at the water treatment and gas compression plants, there will be significant PM2.5 emissions. The air quality assessment and greenhouse section also fail to model the likely substantial escape of fugitive methane emissions.

3. Dark Sky:

Australian mammals such as the Squirrel Glider are nocturnal and are accustomed to dark skies for foraging. Light pollution generated by flares, compressor stations and the water treatment plant will ruin this dark sky, which is also vital to the functioning of the internationally renowned Siding Spring Observatory nearby.

4. **Groundwater and the Great Artesian Basin:** Santos' project is expected to remove 37.5GL of groundwater over the life of the gasfield, mostly in the early years. The coal seam needs to be dewatered to release the gas, but this aquifer lies beneath the Pilliga Sandstone, part of the Great Artesian Basin recharge. Santos' EIS admits that the project will result in a loss of water from the GAB recharge aquifer over time. CSG in Queensland has drawn down GAB aquifers already. We can't afford to risk this crucial resource.

5. **Salt:** The water removed from the ground by Santos will be treated, but this creates another problem: what to do with the salt? Peak salt production at Narrabri CSG will be 115 tonnes *per day*, or two and a half B-double truckloads per day. In the peak year, this would mean the creation of 41,900 tonnes of salt for disposal, which Santos says will take place in landfill. Noise and dust from this activity will further disturb native wildlife.

6. **Cultural heritage and the Pilliga:** The Pilliga is a spiritual, cultural and social icon for Gomeroi/Gamilaraay people. Fragmentation and industrialisation cuts people off from their heritage and connection to country.
7. **Climate change:** recent research by the Melbourne Energy Institute shows that Australia may be dramatically under-estimating the fugitive methane emissions from unconventional gas, including coal seam gas. It's not needed or useful as a source of energy: we have the technology we need to replace gas with renewable energy sources. In addition, climate change is seen as a major challenge for Australian native flora and fauna.
8. **Social and health impacts:** Santos' social impact assessment is three years old and utterly inadequate. The compendium of health studies produced by the Concerned Health Professionals of New York shows mounting evidence for health damage by unconventional gas operations, including water contamination and respiratory illness. The Government must insist that Santos conduct a proper health impact assessment including modelling exposure pathways, reviewing literature and engagement with the Narrabri community. In Narrabri, this project will have negative impacts on cost-of-living, the labour and housing markets. The latter is cited in as a *benefit* of the project but it will not benefit low-income renters. The effect of the project on cost-of-living in the Shire needs to be modelled, assessed and considered, as do the labour dynamics of the project. The project entirely surrounds Yarrie Lake, and Santos propose that wells might come as close as 200m from the Lake.

Summary

This project should not be allowed to go ahead.

Santos' EIS is very short on detail. It does not provide maps indicating where these 850 wells and the lines and infrastructure that run between and around them will go. Santos is seeking a blank cheque consent for this gas field on the promise that it will decide where the wells will go afterward using a "Field Development Protocol." No project has ever been assessed this way before in NSW and the constraints Santos propose are weak and subject to change later on. This is not an appropriate way to assess the largest development project ever undertaken under the Environmental Planning and Assessment Act and the Government must insist that Santos release details to the public about the placement of its wells, pipelines and some other infrastructure.

There is no justification: The significant harm on the social, environmental and economic values of the Narrabri Shire and New South Wales that this project will inflict needs to be weighed against the economic justification for the project, but there is no such economic justification. Santos is one of several large gas companies that threw the east coast gas market and the industries that rely on it into turmoil by opening up CSG fields in Queensland and contracting to sell more

gas than those fields can produce to overseas customers. They drove up the price of gas and are plundering supplies previously available to manufacturers and power stations.

The gas produced at Narrabri might be as little as 4.9% of the volume contracted for sale out of Gladstone. It's not going to bring down prices. In fact, it will force prices up, because unconventional gas like CSG is so expensive to produce and yields are so low. Research undertaken by gas company AGL shows that gas from the Pilliga would be the most expensive gas of anywhere in the current east coast gas market. The number of jobs the project will support once the construction is over is just 145. Weighed against damage to the land, and the Great Artesian Basin, this makes no sense. We need sustainable jobs, not plunder for profit.

Blue Mountains Bird Observers concentrates on risk to birdlife when looking at environmental issues. This is our Objective as stated in our constitution is:

"... to encourage birdwatching and knowledge about and appreciation of birds, and to promote the conservation and protection of native birds and their habitat."

It is our responsibility to object and oppose wherever we see major threats to native birdlife, particularly those species under threat or unnecessary pressure.

We therefore hope our concerns are carefully considered and the project not approved.

Thank you for the opportunity to comment.

Sincerely

A handwritten signature in blue ink that reads "Paul Vale". The signature is written in a cursive style and is positioned above a horizontal line that extends to the right.

Paul Vale

Conservation Officer

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