

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

**This is a submission to the Narrabri Gas EIS.  
We object to this project and believe it should be rejected.**

Concerned Communities of Falkirk (CCoF) are a group formed of individuals from various communities in the Falkirk area of Central Scotland. Our website is [www.faug.org.uk](http://www.faug.org.uk). Our group formed in early 2013 in response to a planning application by Dart Energy, to drill for coal bed methane (CSG) locally – very close to our homes. This application was the first for commercial production of CSG in the UK (16 test wells have already been drilled in our area over the past 20 years). The application was the subject of a Public Inquiry in 2014. CCoF presented evidence at the Public Inquiry and our legal team represented 9 of Falkirk's Community Councils. In 2015, the Scottish Government imposed a moratorium on all forms of unconventional oil and gas extraction, pending further research and a full public consultation (which runs until 31<sup>st</sup> May 2017). We still do not know the outcome of the Dart Energy planning application.

We have spent the past 5 years educating ourselves about the unconventional gas industry, and its potential impacts - particularly on public health and the environment and its contribution to climate change.

**We object to the Narrabri Gas Project on the following grounds:**

- 1) It will extract billions of litres of toxic groundwater and put the Great Artesian Basin at risk. This is a critical water source for inland Australia. Extracted groundwater will contain vast amounts of salt which will need to be disposed of. Santos has provided no information about its salt disposal plan.
- 2) There is a growing body of evidence showing that unconventional gas extraction is harmful to health. Research on important topics relevant to social, community and health impacts have been published in recent months, strengthening the case for a precautionary approach. (Ref: Physicians For Social Responsibility Compendium of Evidence now in its 4<sup>th</sup> Edition <http://www.psr.org/assets/pdfs/fracking-compendium-4.pdf>).

Children are particularly vulnerable to exposure to environmental toxins, and at greater risk from endocrine-disrupting chemicals at key stages in their development. Endocrine-disrupting chemicals can have major impacts on health which may not become evident for many years. This is concerning since the unconventional gas industry has not been operating for long enough to enable long-latency impacts to be apparent.

We strongly recommend that the evidence, the basis of bans in France, Germany and New York State is heeded and the Precautionary Principle applied to this application.

The Wingspread Declaration on the Precautionary Principle counsels that *'When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not established scientifically. In this context the proponent of the activity, rather than the public, should bear the burden of proof'* (Science and Environmental Health Network 2016'

- 3) Regulation is often proposed as a safeguard, however in our experience the industry is often left to self-regulate. Regulatory frameworks are inadequate and regulatory bodies are under-resourced.

The global alert released in 2012 by United Nations Environment Programme acknowledged that it is impossible to regulate this industry into safety and unintended impacts are inevitable:

*'UG exploitation and production may have unavoidable environmental impacts. Some risks result if the technology is not used adequately, but others will occur despite proper use of technology. UG production has the potential to generate considerable GHG emissions, can strain water resources, result in water contamination, may have negative impacts on public health (through air and soil contaminants; noise pollution), on biodiversity (through land clearance), food supply (through competition for land and water resources), as well as on soil (pollution, crusting).'*' - UNEP Global Environmental Alert System 2012

- 4) The climate impacts of coal seam gas extraction will be considerable. Research shows that unconventional gas extraction may have a worse impact on the climate than coal, when fugitive methane emissions are taken into account. Methane is approximately 85 times more potent than CO<sub>2</sub> over a twenty year period. Global warming scenarios all point to the fact that the majority of fossil fuel reserves must remain unused if global temperature rises are to be kept to the Cop21 agreement of 2°C.

## **Conclusion**

The environmental and health effects /impacts both short term and long term of the proposed development are not properly understood or known yet (latent), given its scale and the opposition of local communities under threat Concerned Communities of Falkirk respectfully recommend refusal of the application.