



Submission

NARRABRI GAS PROJECT ENVIRONMENTAL IMPACT STATEMENT MAY 2017

Contact:

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1. Introduction & Background

The Country Women's Association is the largest women's organisation in Australia. It aims to improve conditions for country women and children. The CWA does this by advocating for its thousands of members, helping local communities, creating a network of support and meeting together in towns and cities. The CWA of NSW ("CWA") has a vital interest in the protection of agricultural land and water and as such, holds a strong interest in the Narrabri Gas Project. In terms of this specific project, it is relevant to mention that the CWA also hold representation on the Community Consultative Committee associated with the project, as well as being consulted on the NSW GISERA Project.

That said, the consultation time and process afforded to regional communities to respond to an environmental impact statement ("EIS") of this magnitude is totally inadequate. There is no question that the EIS, on the face of it, appears to be extremely thorough, although it is, in essence an advocacy document. Government policy dictates that even though Santos has had years to prepare this document, the public and the communities impacted the most by this project, are only given months to respond.

These consultation issues point to wider flaws within the NSW government planning process. All of these issues cannot be canvassed in this submission, however, we do hope that the government notes the serious inadequacies in the consultation that are created not by the proponent, but by its own policy.

Given the length of the EIS and the highly technical nature of its contents, the CWA is only able to respond briefly with our comments below. Although our comments are brief and somewhat general, they are important. As the state's largest network of country women and communities, we do hope that they will be taken seriously by the decision makers.

2. CWA of NSW Policy on Coal Seam Gas Extraction

The CWA of NSW objects to any adverse environmental and social impact resulting from coal seam gas activities and infrastructure, including the impact on property rights and just terms compensation.

In addition, the CWA of NSW supports positive action on climate change. We are calling for and supporting the implementation of a plan for transforming regions, communities and workers from fossil fuel extraction, processing and burning sectors to new, inclusive and sustainable economies. We encourage the use of renewable energy resources in order to reduce greenhouse gas emissions.

It is also the organisation's position that we support research, development and investment into renewable energy in rural Australia as a way of adapting and reducing the risk of climate change in rural areas while scoping and establishing additional, yet sustainable, productive industries for rural populations.



These are all sensible and well-grounded policy positions that have been discussed and debated within our membership. These positions are supported by a majority of members. We ask that consideration of these policies be given when deciding on the suitability of the Narrabri Gas Project.

3. Specific concerns in relation to the Narrabri Gas Project

3.1 Environmental Impacts

Our members are concerned about the potential for the project to cause major damage to water systems, particularly the underground aquifers. Questions also remain about the treatment and handling of produced water during the extraction period. We must be assured that this contaminated water won't make its way back into the uncontaminated aquifers. We are highly concerned with the notion of disposing of produced water into the Bohena Creek. Overall, the EIS does not clearly articulate the breakdown of exactly how specific quantities of produced water will be dealt with. In addition, there appears to be little in the way of a risk assessment in relation to produced water management. The CWA of NSW would like to see more scenario planning on produced water risks.

3.2 Economic impacts

We acknowledge that Santos has voluntarily come on board as a signatory to the "Principles of Land Access" document, which reinforces that when placing wells, land access will not be forced. We are also signatories to this document. This initiative is a welcome one. What is not covered in this agreement, however, are infrastructure and easement issues associated with having a gas field of this size.

This issue is particularly concerning when considered in conjunction with the proposed Field Development Protocol ("FDP") within the EIS. Santos state that the FDP will be developed further as an iterative and ongoing activity. This is unacceptable. Landholders and the community need certainty and specific information about where infrastructure is to be placed and how the linkages between infrastructure sites are to be established. It is not good enough for a 7000-page document to completely gloss over this issue, especially when considering the time given to Santos to develop their EIS.

Landholder rights must be respected at all times when designing the layout of the field. These rights extend not only to access issues but also to the right to have private land values protected. The landholder engagement section of the FDP is totally absent. We do note that Chapter 17 of the EIS covers the issue of land access and property management plans, however it is very important that landholder impact issues in relation to the layout of the field are covered specifically. To not do so demonstrates a lack of genuine understanding of the potential impacts on landholders, their concerns and their questions. This entire FDP needs reviewing and preferably, rewriting to make it



absolutely clear what the impacts are to be and to confirm a genuine willingness from Santos to engage with landholders on the issues.

On the other hand, the CWA of NSW do acknowledge that there are some positive economic impacts to the region as a result of the jobs and industry created from this project. Regional development opportunities of this magnitude are often rare in rural NSW. However, these economic benefits should not be assessed in isolation of other impacts such as social and environmental ones.

We note the GISERA Health Effects of CSG Study Design Report is due for peer review in August 2017. It would be highly beneficial for the findings and recommendations from this study to be included in the government's deliberations on this project.

3. Conclusion

Thank you for the opportunity to comment. This project has the potential to improve the economic viability of the whole Narrabri Shire, but inadequately addressed concerns and a lack of attention to detail will further fuel community angst. We strongly request that our concerns in relation to the project EIS be taken into consideration. Our comments reflect the concerns of our members, which are based on a genuine understanding of and empathy for rural communities.