

SUSTAINABLE LIVING ARMIDALE OBJECTION TO NARRABRI GAS PROJECT

Introduction

Sustainable Living Armidale hereby expresses its absolute and total opposition to the Narrabri Gas Project (the Project). Our submission regarding this project is one of absolute objection to even one single coal seam gas (CSG) well being developed, as described in the Project EIS. Therefore this submission of objection is not open to any form of compromise, for example, a lesser number of wells or “stringent conditions” on operations. Any CSG will only increase the likelihood of their proliferation when it is our firm view that all existing CSG wells anywhere should cease production as a matter of great urgency. To develop any more, in any place, is absolutely unacceptable.

Climate Change Contributions

Coal seam gas has been promoted as cleaner than other energy sources that contribute to climate change, such as coal. By all credible scientific accounts, climate change is right now a worsening global emergency with highly significant and far-reaching consequences. Whereas by some methods of emission accountancy CSG compares favourably to, for example, lignite (brown coal) its production and consumption will still contribute significantly to climate change; much more so than renewable energy sources like solar or wind. Development of the Narrabri Gas Project will itself greatly increase emission, yet it will also add momentum for more large-scale CSG projects. This contribution to the cumulative impact of means the Project should certainly not proceed.

One major concern is both the planned and fugitive (accidental) methane emissions from the 850 wells planned. The actual leakage, rather than just the hazard potential, has been well-documented in many CSG fields around the world. Methane is approximately 20 times more potent than carbon dioxide in terms of a per-unit climate change contribution. Given that we are currently experiencing a worsening climate-change emergency, any further development of such sources of methane is absolutely unacceptable, therefore, so is the Narrabri Gas Project.

Water Quality and Extraction

Where Santos proposes to install 850 coal seam gas wells is a major recharge zone for the Great Artesian Basin. One of the most highly significant groundwater resources on the planet should have no coal seam gas wells anywhere near it! Also, the proposed extraction of the massive quantity of 37.5 gigalitres of groundwater over 25 years is an irreplaceable waste of our precious groundwater resources, to the severe detriment of both our environment and agricultural industries.

Santos’ high-risk quest for CSG in the Pilliga so far has produced disastrous results in the “exploration” phase – with over 20 known pollution incidents, including groundwater contamination, waste spills, and continuing leaks from evaporation ponds. Their poor record in relation to contamination of our precious water resources is not consistent with their false claim that the Narrabri Gasfields proposal will not significantly impact on water quality. Water samples collected from Bohena Creek in 2011 directly below the current reverse osmosis plant show many

contaminants as being 100 to 300 times higher than acceptable levels found in uncontaminated water. If the Project was to proceed such unacceptably high levels of pollution would become a normal feature of surface waters over a much wider scale. These impacts alone justify the refusal of approval for this Project.

Biodiversity and Threatened Species

The Project EIS states that a total of 807 terrestrial flora species were identified within the Project area (691 native) of which ten are listed as threatened species. Four of the twenty-two plant communities occurring within the project area are listed as threatened ecological communities under State or Commonwealth legislation. A total of 289 terrestrial fauna species were identified in the Project area, of which 32 species were listed as threatened or migratory under State and or Commonwealth legislation and an additional 25 threatened and/or migratory fauna species had the potential to occur based on the suitable habitat that was identified

The EIS states that approximately 1,169 hectares of native vegetation would be removed for the Project. Santos claims that because only 1.5% of vegetation and only 3 % of all plant types would be removed there would be little impact. However, satellite images of other CSG fields actually show significant fragmentation of the landscape due to road and well construction. The disruption to habitat by vehicular movements will continue on a 24-hour basis for all the wells in the production phase. This would have a significant effect on animal movements through the area, hindering access to food and breeding partners. The certain reduction in numbers will diminish gene pools, resulting in greater vulnerability to disease, leading to further animal losses. Habitat fragmentation will impact on species which are already under threat from other processes, greatly increasing the potential for local extinctions. These impacts alone justify the Project not receiving approval.

False Justifications in Terms of Economic Growth and Employment

Given the highly dubious past record of numerous large-scale mineral projects providing radically over-inflated predictions of jobs to be created. For example the predictions for the Adani Carmichael Mine proposal in Queensland were shown have been inflated by 1000%.

Santos claims that it is committed to employing local people and using local suppliers and businesses, but only “where possible”. The outcome is likely to be that in most cases, it will not be “possible” because the size of the community only sustains a certain number of locals who already have the specialist skills that will be needed. Or Santos will choose not to employ local workers for a whole range of reasons; whatever they decide makes it not “possible” in each specific case.

The Northern Daily Leader newspaper of 02/03/2017 carries a report that only 10% of the 1050 strong construction workforce will actually be employed from the local workforce. It is highly likely that the local community will lose out from numerous socioeconomic impacts of the influx of a temporary non-local construction workforce. This was certainly the case in Gladstone, Queensland where three LNG plants were constructed on nearby Curtis Island in 2010 (The Sun Herald, 19/03/17).

The Gladstone experience was that the fabric of their local society was torn apart by a dramatic and ultimately catastrophic boom/bust effect from a huge influx of workers during the construction phase. Housing rental and purchase prices sky-rocketed in the short-term and many long-term local residents were forced to leave because they could no longer afford the exorbitant rents. Business owners and local services lost staff because workers were unable to afford housing or left to take up substantially higher wages offered by the LNG corporations. Following the boom, and construction of a large number of new houses, approximately 1200 homes have been left empty, housing prices have plummeted and unemployment has risen dramatically.

The severity and scale of the environmental impacts of the proposal mean that consideration of them must outweigh the local economic future of the Narrabri town, LGA or wider New England North West Region. There is no evidence the proposal not proceeding would harm the existing local or regional economy. However, there is no doubt the near-certainty of major groundwater pollution resulting from the CSG wells will have major negative impacts on the region's existing agricultural industries that currently create much wealth and employ many local residents. Currently unfulfilled potential for expanded and diversified agricultural industries, environmental tourism and other-lifestyle related development is greatly reduced by the proposal due to its highly-pollutive impacts.

Apparent Shortage of Domestic Gas Supplies

Political pressure to develop coal seam gasfields has arisen and been sustained by an apparent domestic shortage of gas supplies. That a looming gas supply shortage will rapidly push up prices for both domestic and business customers, with an especially emotive implication that not allowing gasfields is costing jobs. Yet, time and again, this has been shown to be an utterly false argument used as a justification for large-scale resource extraction projects in Australia. As renewable energy sourced output continues to increase, the non-development of gasfields becomes less of a potential threat to regional, state or national economic and social wellbeing. Even more significantly in this matter is the undeniable fact that this proposal, just like other Australian gasfield developments, such as those of central Queensland, are motivated by and geared almost wholly towards the international export market.

Any existing or predicted domestic gas supply problem is not caused by the lack of extraction of coal seam gas from the Pilliga State Forest, but from previous poor decision making by governments, coupled with corporate greed, which have allowed gas extraction companies to commit to high overall levels of gas exports at the expense of domestic supplies. This issue should be solved at a government level, as has been recently stated by Prime Minister Malcolm Turnbull bringing in new gas export restrictions, not by allowing more gas extraction with its resultant environmental devastation. Better policy still is to do everything possible to increase renewable energy generation as quickly as possible due to the climate change emergency.

Stranded Assets and Public Risk

The current political situation includes the reality of an obvious climate change emergency that is rapidly worsening. As a result, political and financial pressures upon projects that contribute to

climate change, such as the Narrabri Gas Project, will continue to increase. Even with some short-term political hostility towards renewable energy within Australia, with barriers erected and incentives removed, renewable energy project development has soared. For many reasons including rapidly-improving technologies, continuation of many incentives plus continued consumer concern over climate change, renewable energy has become increasingly competitive with other sources at a rapid rate.

Certainly over the medium to long term, and probably also in the short term, the momentum of greater renewable energy generation capacity and lower pricing will only increase. Any other scenario appears increasingly unlikely. This means any current CSG proposal involves great financial risks now, including that of the entire project collapsing in bankruptcy, with such risk only increasing in the future. This presents great risk to the public of increasing subsidies (such as royalty ‘holidays’), financial bailouts and governments paying for environmental remediation costs of failed resource extraction projects that they approve. Such risks are now very high for the Narrabri Gas Project, and therefore, on these grounds alone, the Project must not proceed.

What We Have Seen

Several members of Sustainable Living Armidale have witnessed in person the devastation caused by the poisoning of the soils in the Project area from the toxic pollutants of CSG. We have seen how these highly-pollutive toxins have spread outwards from their tiny point source, bringing an seemingly ever-widening area of death to all the flora in its path – that is all the trees, all the shrubs and all the grasses. Such colossal, long-term destruction – that we have seen with our own eyes – is from accidental leakages of fluids that came from a small number of minor “exploration” wells. We are truly frightened by the potential for such appalling pollution over the much larger scale would be affected by a full-production gasfield of 850 CSG wells.

Conclusion

Some of the unacceptable socioeconomic and biophysical environmental impacts and risks of the Narrabri Gas Project are described and discussed above. We have no doubt there are many more. Each of these alone is enough to justify the State Government to exercise extreme caution when considering approval of such a proposal and, on the basis of the precautionary principle, refuse it. Considering the sum total of all these certain and likely impacts and high risks, the Project must absolutely not proceed in any form, under any conditions.

Yours Sincerely.

The Coordinating Committee
Sustainable Living Armidale
Armidale, NSW