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Submission to the Narrabri Gas Project
Environmental Impact Statement

I object to the Narrabri Coal Seam Gas Project and am convinced that it should not go ahead.

What is Wrong With Santos' EIS?

The EIS is a very flawed document and should be rejected. A new, totally independent EIS should be prepared so as to avoid the structurally corrupt system of 'the developer paying for the EIS that says what the developer wants'.

Some reasons to 'fail' the EIS include:

- On the first page (would you believe it!), in the Foreword: "... the project is not located within a major recharge zone of the Great Artesian Basin." Such an opening lie should be enough to dismiss the entire EIS. Although this statement is contradicted on page 11-10, it certainly alerts the reader to the likelihood of lying and cheating in the following 7,000 pages.
- Neither the Foreword nor the Executive Summary mention the term "coal seam gas", using instead the innocuous-sounding "natural gas". In fact, throughout the entire EIS, Santos never describes the Narrabri Gas Project as a "coal seam gas" project. Except for the necessity of quoting government documents and just a very few technical references, the phrase 'coal seam gas' has been purged from the EIS. This is classic obfuscation. The production of coal seam gas and other unconventional gas resources has a whole set of risks and impacts that are different and greater than conventional gas.
- The EIS (supposedly) deals with the impacts of the project over 25 years. This is totally inadequate. The reality is that this coal seam gas field, if it went ahead, would have serious impacts over a much longer period. Local impacts would disrupt the environment, heritage, social systems and economy for decades. The regional impacts on water, especially the Great Artesian Basin aquifers, would last for centuries. The divisive, neocolonial aspects of the proposed project would set back the cause of Aboriginal self-determined social justice in the region by many decades. Health impacts could last for generations. Through the corrupting effect of going against the public interest in favour of vested private interests, the harmful impact on NSW and Australian democratic social institutions

would last for many decades. The legacy of toxic waste at the project site would last for centuries. The impact on global climate, and international efforts to co-operate to reduce greenhouse gas emissions, would last for more than a century.

- The EIS is very poor on cumulative impacts. It describes a coal seam gas field of 850 wells operating over 25 years as if that is the likely reality. Santos has extensive Petroleum Exploration Licenses covering much of the 'north-west slopes and plains' region. Santos has identified 7 hot spots as likely future coal seam gas fields across the region. The history of coal seam gas fields in south-east Queensland shows clearly that once a coal seam gas field is established, it continues to expand, to its geologically controlled limits, to take advantage of economies of scale and established infrastructure. This also applies to the industry as a whole on a regional scale. So the likely reality is that the Narrabri Gas Project, as proposed, would be a small beginning of an expanding coal seam gas industry that could both spread from the initial gas field and become linked by infrastructure to several other coal seam gas fields across the region. This is the scale of the cumulative impact that needs to be examined.
- The EIS consistently understates the impacts of the proposed project on: the amount of vegetation clearing; the disruption to the local economy; the drawdown of aquifers; the harm to Aboriginal heritage and society; the disturbance of local farming; insurability of farming and other co-located industries; the loss of biodiversity; the likely pollution of aquifers and surface waters; the risk of bushfires in the Pilliga; the perversion of policy direction away from the need to rapidly reduce use of fossil fuel; the effect of light and dust pollution on the internationally significant optical observatory at Siding Spring; and the releases of methane.
- The EIS provides no map or other information to accurately depict where impact would occur and infrastructure would be located.
- The lack of known impact areas, together with the lack of knowledge of cultural site location, means that the EIS has been unable to assess actual impacts on Aboriginal cultural heritage. Instead, the EIS proposes that the project be approved and then cultural heritage be managed by a Santos-controlled management plan with uncertain outcomes.
- The EIS contains no adequate or convincing rehabilitation strategies to repair damage to the local environment or heritage values.
- The EIS has inadequate baseline data and projections for: cultural heritage sites; air quality; water quality; stygofauna; surface water flows (in creeks to be impacted); loss of jobs; loss of affordability of services for local people; composition of treated water; composition of salt waste.
- The EIS contains inadequate and unrealistic information on the cost-effective feasibility and environmental acceptability of the proposed disposal of the huge amount of toxic salt waste that would be produced.
- From Santos' recent statements, the EIS seems to be based on acceptance by Santos that global temperatures will rise by 4°C. This complicity in global climate destruction cannot be accepted and is grounds for rejecting the EIS.

- The EIS does not even attempt to address the need for a social licence for such a controversial project. Clearly there is no social licence. This is evident by the many protests, using every available channel. The movement to oppose coal seam gas in the region is unprecedented in that it involves Aboriginal people, farmers and conservationists standing together for a better future. The lack of social licence is also evident in the many declarations, totalling over 3 million hectares, of 'gasfield free neighbourhoods' across the region.
- The EIS fails to demonstrate that there is 'free, prior and informed consent' in the community for the Narrabri Gas Project. Clearly, such consent does not exist.

What is This EIS Really For?

- Santos' shameful EIS for the Narrabri Coal Seam Gas Project looks more like an investment prospectus or even a sales brochure, rather than a genuine assessment of the risks and possible impacts of the proposal. Santos has dumped the Narrabri Gas Project in its "non-core assets" category and valued it at \$0. The EIS seems like window dressing in preparation for a wished-for sale to a naïve buyer.
- This Santos strategy is not likely to work. Potential buyers will learn that there is wide and unprecedented community opposition. The Narrabri Gas Project may soon be called "a stranded asset" by Santos, but the people of the region know that in truth it is "a stranded liability". Leave it in the ground.

What is Wrong With the Narrabri Gas Project?

- Coal seam gas will always have unacceptably high environmental and social impacts. Because the methane is tightly bound up in fairly level seams of compact toxic coal, many closely spaced drill holes are required to collect the gas. High risks can be expected.
- Once all fugitive emissions are taken into account, coal seam gas is worse than coal for global warming. Neither coal seam gas nor even conventional gas is a transitional fuel that will assist the move from coal to renewables.
- Investment in the massive infrastructure needed to establish a coal seam gas industry will create vested interests that will oppose and slow down the rapid and total transition from fossil fuels to renewable energy. This rapid transition is essential to care for the things we value from the past and to ensure that future generations have a habitable planet.
- There is no good reason to proceed with the Narrabri Gas Project.
- At the local scale it will harm: heritage values; biodiversity; ecosystem function; water; health; farming; and social networks.
- At the regional scale it will: endanger the priceless aquifers of the Great Artesian Basin; sabotage collective efforts for social justice; pervert economic activity into a boom and bust cycle; and ruin the dark skies on which astronomy depends.

- At a national scale this industry threatens democratic institutions and the good functioning of civil society.
- At the global scale, the Narrabri Gas Project, every coal seam gas proposal, every fossil fuel proposal, will add to global warming and undermine the commitments made in the Paris Agreement of 2015.
- There seems to be only one reason driving the Narrabri Gas Project: to get lots of money for a few people. This is not reason enough to proceed. The cost is just too high.

Recommendations: The Alternative

- Do not approve the Narrabri Gas Project.
- Cancel all petroleum exploration licences in NSW.
- Shut down the coal seam gas industry in NSW.
- Ensure that local and regional environments and communities never become 'sacrifice areas' for some larger imagined 'greater good'.
- Support and promote more active local and regional civil society groups seeking sustainable land use and social justice.
- Reform the process of preparing environmental impact assessments to ensure they are independent of 'developer influence'.
- Act to make a rapid and complete transition from fossil fuels to renewable energy.
- Support and promote local community ownership of renewable energy infrastructure.
