



Narrabri Gas Project – Responding to the EIS

Boggabri and Narrabri

27 March 2017

Emily Ryan – Outreach Director – Professional Programs



About EDO NSW

- Non-government, not-for profit community legal centre specialising in public interest environmental law
- We help people to protect the environment through law
- Services extend to all of NSW – Offices in Sydney & Lismore
 - Legal advice and casework
 - Policy & law reform
 - Community legal education
 - Professional development
 - Aboriginal, scientific and international programs
- EDOs of Australia

Workshop overview

- Narrabri Gas Project – How to have your say
- Next steps



Information, not advice

- The information contained in this workshop is a guide only and is no substitute for legal advice relating to your particular issue.
- If you need legal advice about your particular issue, please call our Environmental Law Line on 1800 626 239.

NARRABRI GAS PROJECT – HOW TO HAVE YOUR SAY

EDDO

What is proposed?

- The Narrabri Gas Project involves the progressive development of a coal seam gas field comprising up to 850 gas wells on up to 425 well pads over 20 years, and the construction and operation of gas processing and water treatment facilities, including:
 - a central gas processing facility for the compression, dehydration and treatment of gas;
 - a water management facility for the storage and treatment of produced water;
 - an in-field gas compression and water management facility; and
 - water and gas gathering pipelines and ancillary infrastructure.

Who is the decision-maker?

- NSW Department of Planning and Environment assesses the application.
- Planning Assessment Commission (PAC) determines the application where more than 25 objecting submissions received, or Council objects, or reportable political donations declared.
- To date, over 2,700 submission have been received by the Department.

What has the process been for the current DA?

- Santos submitted request for Environmental Assessment Requirements submitted to Planning Department in March 2014.
- Department issued Environmental Assessment Requirements (DGRs) in August 2014 following correspondence with Department of Primary Industries, Resources and Energy, EPA, OEHL, RMS, Narrabri Shire Council, Commonwealth Environment Department.
- Department re-issued Environmental Assessment Requirements (SEARS) in September 2016 following further consultation with these stakeholders.
- Application lodged 1 February 2017.
- Submissions extended – now due 22 May 2017.

How do I set out my submission?

- Introduce yourself or your group. What is your background and experience?
- Explain why are you interested in and how you will be affected by the development
- Give recommendations – tell the decision-maker what you want them to do

How do I set out my submission?

- Personalise the submission – it's OK to a sign pro forma submission, but ensure you personalise it a bit
- Talk about how the proposal will affect
 - you
 - your family
 - the environment
 - the local economy
 - existing industry

What documents am I commenting on in my submission?

- Everything that makes up the DA – (SSD 6456), including Environmental Impact Statement and all appendices
- All documents are available on the NSW Planning and Environment Major Projects website:
 - http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6456

Major projects website – EIS and other relevant docs

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6456

Narrabri Gasfield

Narrabri Gas Project

EIS Exhibition

The Narrabri Gas Project involves the progressive development of a coal seam gas field comprising up to 850 gas wells on up to 425 well pads over 20 years, and the construction and operation of gas processing and water treatment facilities, including:

- a central gas processing facility for the compression, dehydration and treatment of gas;
- a water management facility for the storage and treatment of produced water;
- an in-field gas compression and water management facility; and
- water and gas gathering pipelines and ancillary infrastructure.

For more information, please contact the Department via email at narrabrigas@planning.nsw.gov.au or phone on 1800 616 493

Attachments & Resources

- + Website Links (1)
- + Request for Secretary's Requirements (1)
- + Secretary's Requirements (6)
- + Development Application (3)
- + Environmental Impact Statement (38)
- + Environmental Impact Statement Appendices (35)

Key dates and other information



Key issues – SEARs

- Water – including:
 - Likely impacts on quantity and quality of ground and surface water
 - Likely impacts on aquifers, watercourses, riparian land, water-related infrastructure, groundwater dependent ecosystems, and other water users
- Land – including:
 - Agricultural Impact Statement
 - Compatibility of the development with other land uses in the vicinity (including recreational uses of the Pilliga)

Key issues – SEARs

- Biodiversity – including:
 - Likely biodiversity impacts
 - Proposed regime for minimising, managing and reporting
 - Offset strategy
- Heritage – including:
 - Likely Aboriginal and historic heritage impacts
 - Adequate consultation with Aboriginal stakeholders

Key issues – SEARs

- Air Quality – including:
 - Likely air quality impacts
 - Likely Greenhouse gas impacts (including baseline and fugitive emissions)
- Noise – including:
 - Likely operational noise impacts
 - Justification for claim for construction noise criteria
 - Likely road noise
- Transport – including:
 - Likely transport impacts on capacity, condition, safety, and efficiency of local and State road network

Key issues – SEARs

- Visual – including:
 - Likely visual impacts on private landholders in the vicinity and key vantage points in the public domain
 - Likely lighting impacts on Dark Sky Region
- Public safety – including:
 - Likely risks to public safety (especially bushfire risks, gas leaks, transport, handling and use of dangerous goods)

Key issues – SEARs

- Social and economic – including:
 - Likely social impacts (including management of social impacts once development ceases)
 - Likely economic impacts
 - Demand for provision of local infrastructure services and housing generated by the project

Key issues – Focus

- Water
- Economics
- Ecology – both plants and animals
- Fugitive Emissions
- Gas Resource Markets

How do I go about preparing a submission?

Read proposal and supporting documents

Identify key issues/concerns

Clearly set out your concerns and support with facts/evidence

Tell the decision maker what you want them to do

Submit before deadline

Engage the reader

- *Think about your strategy. What will motivate people?*
- *Keep submissions on-topic.*
- *Give insights into analysis or experiences from elsewhere that make your case.*
- *Point to innovative ideas.*
- *Make your submission short and punchy.*
- *Get the reader engaged early.*
- *Be objective and outcome focussed.*
- *Have a civilised and interesting conversation.*

- Tom Grosskopf, Director Metropolitan Branch,
Regional Operations, Office of Environment and Heritage

Engage the reader

- *Include a summary at the top of your submission.*
- *Use headings within your submission to structure your argument.*
- *Use clear language.*
- *One idea per paragraph.*
- *Put your idea in the first sentence, then explain it in the rest of the paragraph.*

- Tom Grosskopf, Director Metropolitan Branch, Regional Operations, Office of Environment and Heritage



CURRENTLY VIEWING: [Home](#) » [Have Your Say](#)

Have Your Say

A community guide to influencing environmental outcomes

[View current opportunities to have your say now](#)

Law and policy has a critical role to play in the sustainable management of the environment. Successful environmental policy depends on good regulation, which in turn requires community engagement. The importance of community engagement and public participation is recognised in many of our environmental laws. This resource aims to facilitate community engagement in environmental decision-making processes, and by doing so, help to achieve the objectives of environmental laws.



PAGES IN THIS SECTION:

[Have Your Say](#)

[Ongoing Opportunities to Have Your Say](#)

[Have Your Say Now - Current Opportunities](#)

[Featured Opportunity - Senate Inquiry - Landholders' Rights to Refuse \(Gas and Coal\) Bill 2015](#)

[Featured Opportunity - Landholder compensation for gas exploration and production](#)

[How Can I Have My Say?](#)

[Fact Sheets - Have Your Say](#)

[Tell Us What You Think](#)

NEXT STEPS

E

D

O

What happens after I have made my submission?

- Likely timeline:
 - Department of Planning and Environment provides Santos with submissions or a summary of submissions
 - Santos prepares response – may take a few months – depends on complexity of issues raised
 - Department assesses application and prepares an assessment report (likely if it's going to PAC). Will engage independent experts to peer-review application
 - PAC may be asked to review the project
 - PAC likely to hold a public hearing
 - Final determination will be made by PAC – likely to be 12 months away
 - Federal Environment Minister's determination

Concurrence from other agencies

- Before the application can be determined, concurrence may be required from:
 - Office of Environment and Heritage
 - Potential to affect threatened species, populations or ecological communities
 - Potential to impact Aboriginal heritage
 - EPA
 - Pollution licence/licence variation
- Consider contacting these agencies to voice your concerns

Other approvals required

- Additional permits and approvals may also be required:
 - Department of Primary Industries – Water
 - Water use approval
- Consider contacting these agencies to voice your concerns

What happens after I have made my submission?

- It's likely that the PAC will hold a public hearing
- Community members and groups can register to speak
- If a PAC hearing is held, merit appeal rights to the Land and Environment Court after final determination are extinguished
- Some communities have recently put together PAC hearing programs including a barrister, experts, one community representative

Gathering evidence

- Take baseline readings now so that you can track the impact of any future operations:
 - Surface water
 - Groundwater
 - Native vegetation
 - Plants and animals
 - Air
 - Noise

Report suspected breaches



Wednesday August 17, 2016

News | Local News

Aa Larger / Smaller ☾ Night Mode

Narrabri gets EPA office to watch over coal seam gas projects



Jamieson Murphy

[@jamiesonmurph](#)

20 Jul 2016, 11:25 a.m.

[f Share](#) [Tweet](#) [Email](#)

More information about the EIS and assessment process

- You can contact the Department via email at narrabrigas@planning.nsw.gov.au or on 1800 616 493

Free initial legal advice, website, fact sheets and updates

- Free Environmental Law Line Monday-Friday
 - 1800 626 239
- Fact sheets and other resources on our website
- Free weekly eBulletin – updates on environmental law, policy and decisions
- <http://www.edonsw.org.au/>

Support our work

- Your support for EDO NSW will help us to:
 - Provide legal advice and representation
 - Promote changes to environmental laws
 - Provide community legal education
- Donations over \$2 are tax deductible
- Forms here today
- You can also donate online
 - www.edonsw.org.au/donate