Make a submission against the Narrabri Gas project

The Independent Planning Commission will soon make its decision about the Narrabri coal seam gasfield. Make sure you lodge your objection by visiting the IPC's website here. The closing date for submissions is Friday 31 July.

What you need to know

- Santos plans to develop 850 new coal seam gas wells across 95,000 hectares in the north eastern part of the Pilliga forest near Narrabri, clearing close to 1,000 hectares of the forest in small patches and connecting lines in the process.
- There are two pipeline options associated with the gasfield: an eastern Queensland-Hunter Gas Pipe to Newcastle and Western Slopes Pipeline to join the Moomba-Sydney pipeline. The government is proposing a condition requiring one of these to be approved before Santos proceeds to full development of the gasfield.
- A decision about the gasfield will be made by the Independent Planning Commission, which is asking for public submissions and speakers at a public hearing into the project.
- This project is the most controversial in the history of the NSW planning law. The Environmental Impact Statement attracted 22,721 submissions, of which 98% were objections. The majority (63%) of the 470 submissions from the immediate local area were also objections.
- The release of the Assessment Report by the Department of Planning also included a list of recommended Conditions of Consent, should the project be approved.
- Of the 16 recommendations made by the NSW Chief Scientist in 2014 to guard against the risks of coal seam gas, only 2 have been fully implemented, and half haven't been done at all.

Your submission should be unique and focus on your area of interest, but here are some background facts to help you.

Water

- Over 20 years, Santos will remove 37.5 billion litres of water from deep below the Pilliga and treat it in the Leewood water treatment facility. This treatment will produce up to 840,000 tonnes of solid salt, laced with heavy metals, for which Santos still has no disposal plan.
- Removing this water will cause depressurisation and loss of water in the Pilliga Sandstone, the southern recharge of the Great Artesian Basin, which outcrops in the Pilliga.
- Santos has used the most basic level of groundwater model because of how little is known about the deep aquifers they will dewater to extract gas.
- Santos anticipates leakage from the precious alluvium that lies above the coal seams despite claiming there is no linkage between the water sources. Landholders that rely on the GAB, the Gunnedah Oxley Basin and other groundwater in the area are strongly opposed to the project.

Social and economic impacts

- Coal seam gas brings upheaval and division to rural communities. A CSIRO survey in 2014 found that only 6% of local people living in Queensland gasfield areas thought the industry had improved their lives while 42% said that they were "not coping" or "only just coping".[1]
- Santos' own assessment found that there would be "almost certain" impacts on housing affordability for Narrabri residents, which will disproportionately affect low-income households and Indigenous people, who are far more likely to be renters.

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[1] Walton, A., McCrea, R. and Leonard, R. (2014). *CSIRO survey of community wellbeing and responding to change: Western Downs region in Queensland*. CSIRO Technical report: CSIRO, Australia. https://gisera.csiro.au/wp-content/uploads/2018/03/Social-2-Final-Report.pdf

- Claims of job creation are crucial to the project's justification, with an anticipated average 190 jobs created locally and 322 in the rest of the state, but this comes at other industries' expense. Santos' own assessment admits there would be lost employment in agriculture and manufacturing as a result of the project, despite unsubstantiated claims of flow on jobs in NSW.
- Santos claims the gasfield is needed to "increase supplies" of gas, but there's a glut of exported gas from Queensland and ships of Australian gas are sitting idle unwanted.[2]
- The majority of social impacts are proposed to be mitigated through the use of the Gas Community Benefit Fund, the use of the Community Consultative Committee and a range of Landholder Compensation agreements, ignoring many of the negative impacts of the project.

Aboriginal cultural heritage

- The Pilliga is a hugely significant landscape for Gomeroi people. Santos' Aboriginal cultural heritage assessment identified 90 known Aboriginal cultural heritage sites in the project area, including rock shelters, burials and historic camps and hearths.
- Santos promises its drill pads and infrastructure will avoid these sites, but they're based only on previous work. No detailed new surveys for Aboriginal cultural heritage have taken place yet.
- Santos proposed to undertake detailed surveys *after* it gets approval and avoid newly found sites of high significance but by that time it will be too late to stop the gasfield.

Biodiversity

- The Pilliga is the largest temperate woodland in eastern Australia and CSG will industrialise 95,000 hectares of it, clearing nearly 1,000 hectares in small patches for well-pads, infrastructure and gaslines, including removal of several endangered ecological communities.
- Only limited surveys were actually undertaken as part of the assessment of the gasfield, but these found 10 threatened plants and 35 threatened fauna in the gasfield area, including pygmy possums, koalas and the Pilliga mouse.
- The Pilliga once hosted one of the most important koala populations in New South Wales, but the species is now on an extinction trajectory in the area. With so much habitat and lives lost to recent bushfires, it is crucial to the survival of the koala that its bushland habitats be spared industrialisation.

Greenhouse gases and climate change

- Total greenhouse gas emissions produced by the project could be 127.8 million tonnes of carbon dioxide equivalent, or 5 million tonnes a year. In a time when Australia is struggling to meet its commitments under the Paris Climate Agreement, this one gasfield would *increase* Australia's greenhouse gas emissions by nearly 1% per year!
- Mobilising methane in coal seams could lock in ongoing fugitive emissions of this potent greenhouse gas for decades to come.
- Globally, the UN Environment Program's *Production Gap Report* in 2019 found that, "With average lifetimes of 20 years or longer for pipelines, terminals, wells, and platforms, the time to begin planning for a wind-down of gas production is, as with other fossil fuels, already upon us."
- Their report found that to achieve the Paris Climate Agreement goal of keeping average global warming well below 2 degrees, global gas production needs to peak by 2030 and decline after that. To meet the safer 1.5 degrees warming limit, gas production needs to peak this year.[3]

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[2] See Toscano, Nick "Australia's LNG tankers sitting idle as global supply glut, COVID start to bite." 17 June 2020. *Sydney Morning Herald*. https://amp.smh.com.au/business/the-economy/australia-s-lng-tankers-sitting-idle-as-global-supply-glut-covid-start-to-bite-20200615-p552oh.html

[3] UNEP, *The Production Gap Report*. 2019.