



Blue Mountains Conservation Society Inc

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To: The Independent Planning Commission

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Blue Mountains Conservation Society submission to the Independent Planning Commission in opposition to the Narrabri CSG project

Blue Mountains Conservation Society

Blue Mountains Conservation Society is a community organisation with over 800 members working to preserve the natural environment of the Greater Blue Mountains.

As a Conservation Society we oppose the proposed Narrabri CSG project for the following reasons:

- the release of greenhouse gases including methane increasing Australia's contribution to climate change
- the excessive use of water and the by-product of solid salt waste
- detrimental impacts on biodiversity of this region
- destruction of Aboriginal cultural heritage

Contribution to Climate Change

Associate Professor Bryce Kelly, an environmental scientist from the University of New South Wales has drawn on information from the Australian government's National Greenhouse and Energy Reporting Scheme to argue that this project would be responsible for approximately 1 million tonnes of greenhouse gas emissions each year. This would make it the 54th largest source of emissions in Australia. Professor Kelly also claims that Santos have underestimated the amount of greenhouse gas emissions in their modelling,

Scientific consensus is that the world is facing a climate emergency and consequently, the world needs to move to net zero carbon emissions. In line with this, Australia needs to meet its commitments under the Paris Climate Agreement. If the Narrabri CSG project were to go ahead it would increase Australia's greenhouse emissions by almost 1% annually. In his submission to the IPC, Climate Scientist, Professor Will Steffen has stated: "The fossil fuel industry cannot continue to

expand. Allowing any new gas development is fundamentally at odds with protecting Australians from the impacts of climate change”.

The impact of climate change in the Blue Mountains was made evident during the summer of 2019/20 when Australia experienced bushfires of unprecedented extent, duration, and ferocity. Over 75% (806,351 ha) of the Blue Mountains World heritage area was fully or partly burnt during the 2019-20 fires. Areas of adjoining bushland on Crown land or private property were also burnt. An estimated 135 million mammals, birds and reptiles were impacted by the fires.

The increasing bushfire risk applies to the Pilliga region where the Narrabri CSG project would be situated. Greg Mullins, former commissioner of Fire and Rescue NSW explains that as well as the Pilliga region becoming increasingly flammable and subject to extreme fire weather, the presence of CSG gas flares and mining activities introduce new potential ignition sources.

Water

As well as concerns about the immense quantity of water required for this project and the 800, 000 tonnes of solid salt waste by-product, the Society is concerned about the critiques of Santos’ groundwater model. Advice provided by the Water Expert panel as part of the NSW government assessment of the project included critiques of the inaccuracy of the model as well as its ‘poor predictive capacity in relation to the impact of production of the surrounding impacted water sources’. The Pilliga Sandstone is a recharge aquifer of the Great Artesian Basin, and the Society argues it is not acceptable for a project to be granted approval without accurate modelling of the impact of CSG mining on groundwater being carried out.

Furthermore, the removal of the solid salt waste remains a contentious issue. Santos has not provided a satisfactory strategy for reuse or disposal of this waste. In 2015, a Federal Government Department of Environment report titled ‘Hazardous Waste in Australia’ pointed out that CSG waste ‘occur in very large tonnages’ and ‘solid salts are a difficult problem for the waste industry, which often relies on landfill. While they are present in significant quantities in rising numbers, these are probably dwarfed by what is currently in storage, awaiting an acceptable fate option (vii).

Biodiversity

Another significant outcome from this project would be the devastating impact on the biodiversity of the proposed site. The Pilliga is the largest contiguous native semi-arid forest and woodland west of the Great Dividing Range. It hosts a multitude of fauna and flora, including 10 threatened plants and 35 threatened animals including the Pilliga mouse, pygmy possums and koalas. The 2019/20 bushfires caused incalculable loss to fauna and flora and irreparable damage to ecosystems across Australia, and this makes it even more imperative that a biodiversity refuge such as the Pilliga is preserved at all costs.

Aboriginal cultural heritage

The Gomeroi people of the Pilliga region are opposed to the Narrabri CSG project. The project's cultural heritage assessment included identification of over 90 Gomeroi cultural heritage sites, and this is not exhaustive.

The NSW Department of Planning, Industry and the Environment states: We work with Aboriginal communities to preserve, protect and renew culture and heritage.

If the proposed project were to be approved, its impact on the culture and heritage of the Gomeroi people would be the antithesis of this statement.

For the reasons outlined above, the Blue Mountains Conservation Society urges the Independent Planning Commission to refuse consent for the Narrabri CSG project.

Yours sincerely,

A handwritten signature in black ink that reads "T. Cameron". The signature is written in a cursive, flowing style.

Tara Cameron

President