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Narrabri Gas Project Submission to NSW Independent Planning Commission from PECAN

The Port Phillip Emergency Climate Action Network (PECAN) is a network of environment and community groups in the Melbourne municipality of Port Phillip which have joined together out of the shared awareness of the realization that we are indeed facing a climate emergency.

Our Statement

As the NSW Independent Planning Commission (IPC) has invited public comment regarding the Narrabri Gas Project, we would like to have our community groups' comments put on record. We believe that the NSW Department of Planning, Industry and Environment (DPIE) has not completely taken into consideration certain aspects of the planned Santos development as well as the detrimental long-term impacts on the environment. Although the Department, through the Water Expert Panel (WEP,) consulted with varied interest groups to allay concern for the land and water supply in the area, we do not feel confident that the overwhelming opposition to this project was given sufficient consideration in the formulation of the Department's recommendations. As was pointed out in the DPIE's assessment report¹ to the IPC during the exhibition stage, this proposal received nearly 23,000 submissions, with 98% opposed to the project. While the Department states that the local area shows a broader spectrum of views, it is clear that the overwhelming majority in the community does not hold a great deal of confidence in Santos and the certainty of it meeting all requirements stipulated during the public hearing.

Why we oppose the Narrabri Project

Safety and environmental impacts

With the fossil fuel industry having a less than stellar record of protecting both environment and communities, it's not surprising that so many are critical of the undertakings expressed by Santos with regard to this project. It is not an understatement in saying that although there are stipulations that Santos will implement measures to ensure that safety will be ensured and environmental impact minimised, there is no guarantee that these measures

¹ <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/03/narrabri-gasproject/referral-from-the-department-of-planning-industry-and-environment/dpie-final-assessmentreport.pdf>

will or can be effective. This has even been pointed out in the report by WEP through their recommendations:

“While the WEP identified some uncertainties, principally due to the lack of detailed information about the deeper geological substrata, it concluded these uncertainties “could be addressed through ongoing monitoring, adaptive management and a robust regulatory regime that is rigorously and effectively enforced”.

The point is, we do not have a robust regulatory regime when it comes to monitoring and enforcement and the idea it will be rigorously enforced in the future is naive at best.

Emissions Issues

We support the position taken by former Chief Scientist Professor Penny Sackett from the ANU that approving a new fossil fuel project with a life of 25 years is indefensible. Professor Sackett points out that the Narrabri Gas Project alone would burn through 11 per cent of NSW’s carbon budget if it is to do its part to meet Paris targets.

“The Project will add about 5 MtCO₂ [million tonnes of greenhouse gases] annually to Australia’s direct emissions at a time when Australia needs to find about 7.5 MtCO₂ new reduction every year to meet its 2030 goal, as well as maintaining the reductions found in previous years.”

“About 50 per cent of Australian gas reserves must remain in the ground to achieve a 2°C [global warming] scenario. Thus, approval of new fossil fuel development or expansion is incompatible with keeping global warming to 2°C, and will ‘lock in’ emissions and warming far beyond the end of mining operations.” As we are increasingly aware, gas is not a transition fuel “to a future world that stays well below 2°C of warming”.

She said gas was a fossil fuel that had only marginal benefits over coal on greenhouse gas emissions, and “perhaps very little at all when methane emissions are fully and realistically accounted.”

Employment

There is an abundance of evidence that a cleaner and more prosperous future Australia can be forged by an early transition away from fossil fuels, with a focus on rapid renewables development. This pathway has been spelled out by numerous public institutions, think tanks and economists - AEMO, CSIRO, Grattan Institute, Climate Council, Climate Works, Australia Institute, BZE, Ross Garnaut and John Quiggin and all major Australian University Sustainability Centres. While details and timing may vary between their designs they all propose rapid uptake of renewables, supported by pumped hydro, battery storage and DER systems with firming gas playing a decreasing role as penetration of the other firming systems increases. Between now and 2040 this pathway can realistically enable electricity to 3 be based on 100% renewable production, gas for commercial, residential and industrial

processes to be phased out, and the transport sector to become electrified or green hydrogen based.

And there are numerous analyses of the future employment opportunities in the renewables transition process, including in coal mining communities like the Hunter and Central Queensland, from BZE and the Climate Council for example.

The evidence is very clear on the impact fossil fuel extraction processes are having on the environment in Australia, yet we still see that it does not suit our governments' agendas to curtail further development of these projects. At present Australia is trying to negotiate a free trade agreement with the EEC which will penalize trading partners who do not have similar commitments to phasing out fossil fuel use – we are penalizing ourselves by further development of projects like Narrabri. We don't want to have to rely on this failed system any longer - we want better ways of generating energy. And the majority of Australians do as well, with commercial leaders, industry groups and professional associations showing their opposition to gas and other fossil fuel industries. It is becoming increasingly clear that the majority of Australians want to plan for a cleaner future based on the industries and manufacturing that can guarantee Australia a more prosperous future.

Conclusion

There is a sense of bias in the final assessment report and the sentiment throughout it keeps expressing the need for jobs. But the jobs in question are not the jobs of the future. In the current pandemic crisis, concern about our future is felt more than ever. The general public, as well as industry and communities across Australia cannot see our governments providing a clear roadmap providing a coherent direction over both the short and long term. If people felt governments were making decisions looking to the future and building recovery from this crisis, then there wouldn't be so much apprehension about what that future may look like. Moving ahead with fossil fuel projects is not part of a prosperous future, it is short sighted, damaging, only benefits a few, and most importantly represents a lost opportunity to set a prosperous new course for Australia.

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