

Action Item 38.6_Response to PFTP Question to DPE 2019_NGP CCC

Question to May 2019 NGPCCC

Question to Department of Planning and Environment and any other NSW Government Department that has authority over the matters raised below.

The Executive of People for the Plains is requesting that the Department of Planning and Environment and any other NSW Department that may have Authority over the matters raised to respond to the listed concerns.

Listed concerns from the People for the Plains Executive.

The cumulative impacts of more than nine state significant fossil fuel projects in the Narrabri region have not been considered. The continual reductionist approach of assessing one individual project's impacts and then another, fails to consider the full network of cascading impacts to a region as a whole.

As we know, the whole is greater than the sum of its parts.

In particular the areas that suffer disproportionately increased levels of negative impacts from multiple projects are:

- 1. Social impacts leading to mental health and community health impacts*
- 2. Water impacts to numerous water sources ultimately impact the hydrology systems of the whole region (and beyond)*
- 3. Land use change impacts ultimately altering the social fabric*
- 4. Air quality impacts from various projects within a landscape*
- 5. Climate impacts from multiple fossil fuel projects*

How will the assessment process for the Narrabri Gas Project take into consideration the cumulative impacts across the region and how will the mitigation and management strategies written into the project approval, manage for these cumulative impacts? Who has strategic oversight of these landscape scale impacts for the future?

These concerns have been brought forward mainly due to the current information that is becoming available with respect to further Coal mine expansions in the Gunnedah/Oxley and Maules Creek Basins. The latest being the Whitehaven Underground Mine Workings Expansion, which according to the Request for SEARs Application will be going under the GAB and GAB Southern Recharge Area and will be removing water at a greater depth from the Hoskissons Coal seam which is part of the Black Jack Group that Santos is intending to remove water and gas from.

Santos has stated in the 2014 EPBC application, that Santos' Operation will have a significant effect on the groundwater in the Gunnedah/Oxley Basin, then it is only logical that another Operation in the same coal seams will greatly enhance the significant effect of the one as well as speeding that significant effect on groundwater.

I trust that the Department/Departments, will respond to the above in a very timely manner and will ensure that the NGPCCC Secretariat distributes the reply to all members of the NGPCCC , also in a very timely manner.

Mr A J Pickard.

Delegate to the NGPCCC for People for the Plains and the wider Community.

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Response

The Secretary's Environmental Assessment Requirements (SEARs) for projects, including the Narrabri Gas Project, require that an assessment of cumulative impacts be undertaken. NSW Government policies, legislation and guidelines provide guidance for undertaking cumulative impact assessment for projects, for example for air (Approved Methods for the modelling and assessment of air pollutants in NSW), noise (Noise Policy for Industry and the former Industrial Noise Policy), social (Social Impact Assessment Guidelines) and water impacts (Aquifer Interference Policy and the Water Sharing Plan framework under the *Water Management Act 2000*).

Santos provided an assessment of cumulative impacts in its Environmental Impact Statement, as required by the Secretary's Environmental Assessment Requirements (SEARs). This included an assessment of the cumulative impacts of the approved Narrabri Coal Mine and other mines in the area. In the case of the Narrabri Coal Mine, the groundwater modelling includes cumulative drawdown impacts from the approved mining operations. Concerns over cumulative impacts were raised in submissions, with Santos providing a response to these issues in its Response to Submissions Report and Supplementary response to submissions. The Department will carefully consider the issues raised in submissions and the information provided by Santos in its assessment of the merits of the project.

In relation to the Narrabri Stage 3 project, the Department recently issued SEARs requiring Whitehaven to assess cumulative impacts, including approved and/ or proposed mining and petroleum development in preparing its EIS for the project as guided by relevant NSW Government policy, guidelines and statutory requirements. In particular the assessment undertaken for the Narrabri Coal Mine would need to assess cumulative impacts as a result of depressurising the targeted coal seams as a result of the proposed extension to longwall mining. Similarly, the Vickery Extension Project currently under assessment was also required to consider cumulative impacts of other approved or proposed projects.

Stephen O'Donoghue
Director – Resource Assessments
Department of Planning Industry & Environment
E stephen.odonoghue@planning.nsw.gov.au



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