

EIA Improvement Project
Department of Planning
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Submission: Discussion Paper, Environmental Impact Assessment Improvement Process

Firstly, let me apologise for the lateness of our comment on the discussion paper outlining the Department's "Environmental Impact Assessment Improvement Project." This is a prime example in fact of how the process is flawed. As a volunteer, I must do this kind of work outside of my work, business and family commitments and thus, I am sitting here on a Sunday night in an attempt to protect my community. The endless necessity to write hundreds of submissions is just one way that this process damages communities. However, we will write another one in the hope that this is the one that will stimulate genuine change.

Furthermore despite our group's past personalised involvement with the Department and our members' active participation in the Narrabri Gas Project, Whitehaven Maules Creek Mine and Whitehaven Narrabri Underground Mine Community Consultative Committees, the Departments' call for submissions on the EIS Improvement Project had NEVER been mentioned to any of our members. We ended up finding out through other groups like ours, not through the appropriate channels of the CCCs or directly from the Department. We question if the Department really wanted written submissions from groups like ours?

Firstly I would like to reiterate how incredibly important it is that all facets of the EIS are undertaken with the strictest attention to detail and the highest level of scrutiny and utilizing the most accurate and up to date data as possible because, once approved, the conditions generated out of the EIS is what people and communities must live with, as a minimum, for the next 25 years. Inaccurate modeling, slightly over-exaggerated or under-exaggerated information can directly correlate to the quality of the health and lives of the people and environments around these mining and gas developments. This is serious stuff and it all hinges on the EIS process. Therefore it is absolutely critical that the EIS process is of the highest standard.

From the perspective of a volunteer community organization trying to navigate the EIS of major projects with little or no support is almost impossible.

In the Narrabri region, we have lived under the shadow of the Narrabri Gas Project (NGP) EIS's imminent arrival for two years now, following the Government's announcement that it would "fast track the approval process of the NGP". The toll that this has taken on our community is difficult to describe.

When I consider why the current EIS is damaging my community, I come back purely to trust and integrity. In a perfect world (one I used to believe in) the Department in charge of the EIS process would be acting purely with the best interests of the community at heart after all, as a tax funded body it should be acting for the tax payers. However time and time again we see multiple examples

at all levels of government and at all angles of the development process that undermine our trust and lead us to question if the Department is acting in the best interests of the community.

Why is this process destroying our community?

Firstly, we know once the EIS is unleashed upon us we will have only six weeks to familiarise ourselves with the tens of thousands of pages of information. In this time we must research, seek assistance and respond. Within these 42 days, the majority of us have at least 30 days of full time work or businesses to run, aside from other family and community commitments.

Not only is this an outlandish ask for a group of volunteers, further salt is added to the wound by recent revelations that other stakeholders often have had access to parts of the EIS document well in advance of the community. This was revealed recently when GISERA quoted verbatim lines from the NGP EIS that is still not released. This further undermines the community's faith in this process.

Secondly, should we find elements of the EIS that is threatening to our community, lacking in quality data and/or providing questionable results, we must provide counter scientific evidence. How do we match this level of data with no funding or resources? We must raise the funds ourselves or call on the good favour of experts who share our deep concern about the impacts of the project/s on our communities.

Furthermore, a large component of the EIS is the reliance on industry funded research and/or consultants. The use of this data to base the decision that holds the fate of the community is completely flawed and counter-intuitive. Why would hired guns provide any information that suggests the project would be damaging to community, when it is obviously not in the best interests of the industry that is paying their bills and determining their future career direction? It is our understanding that the Queensland system in terms of water monitoring is that the proponents pay into a government system that undertakes the monitoring. There needs to be complete transparency and independence (and protection) for those that research and monitor these developments so that the data can be without reproach and relied upon by all.

Whilst the current legislation already makes a mockery of a "level playing field" giving mining companies the right to access land owned by individuals, the EIS process should be the one time that levelness could be created.

The EIS should be the process that genuinely provides an "assessment process" for a proposed project rather than an "approval process". We recently witnessed this with the Referral of Environmental Factors (REF) process for the Leewood Wastewater Treatment Facility. A number of the NSW government departments raised serious concerns about elements of the facility following the public submission process. These concerns were not addressed in the second submission to the REF by the proponent, and yet it was approved. The community is once again left wondering if these processes are actually properly scrutinised by Departments acting in the best interests of the community.

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The deep and multi-faceted involvement that the coal and gas industries have in government processes can never be matched by communities. We rely on governments to act in the best interests of the people, not of corporations and our trust is shattered by the last two year's involvement in the EIS process for the NGP. We look forward to the Department genuinely fixing this process.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Sally Hunter', with a stylized flourish at the end.

Sally Hunter

Secretary People for the Plains