Submission to the Jemena Northern Gas Pipeline Environmental Impact Statement consultation

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Healthy planet, healthy people.

Doctors for the Environment Australia (DEA) is an independent, self-funded, non-government organisation of medical doctors in all Australian States and Territories. Our members work across all specialties in community, hospital and private practices. We work to prevent and address the diseases - local, national and global - caused by damage to our natural environment. We are a public health voice in the sphere of environmental health with a primary focus on the health harms from pollution and climate change.

Based upon our public health expertise DEA has made many submissions into unconventional gas developments including our submission to the Hawke Report in 2014.[1]

We acknowledge the Northern Territory Government for the consultation and education sessions offered in the development of its oil and gas sector, and for opportunity to contribute to this critical part of NT's economic and energy development.

We note that the new ALP government is continuing the previous government's response to the development of onshore oil and gas. However we believe that in the current situation of increasing recognition of the short and long term problems arising from oil and gas, it is timely for a new government to question the rationale for such commitment and demonstrate a difference between the major political parties. We have entered a new era. Health, economic, ecological and employment costs and benefits of oil and gas development need to be questioned.

The Terms of Reference of this Inquiry do not address the issues raised by DEA in our submission around the link between the pipeline project and the onshore gas development required to make the project viable. Nonetheless we have responded to this EIS. We are particularly concerned about the impacts of the project in exacerbating climate change by enabling on-going investment in fossil fuel extraction.

Comment, the need for this development

We question the assumption that there is a need for the Northern Gas Pipeline to meet energy demands in Queensland and New South Wales. This unjustified assumption underpins the entire project. If energy demands on the eastern seaboard can be met more efficiently without this project then the considerable investment involved over decadal time frames could be better used elsewhere, particularly in renewable energy.

The assumption that stimulating gas exploration will result in economic development opportunities also requires further examination. The experience of Queensland is that the gas industry boom has not provided the anticipated long term benefit for rural people, particularly Aboriginal people.

The Institute for Energy Economics and Financial Analysis, a US based think tank, concluded that the project itself is not economically viable, since there is already a glut of gas worldwide, and would be based on government subsidies through PWC (Power and Water Corporation), the only customer for the gas to date. The reduction in proposed pipe diameter is evidence of its dubious economic viability.[2]

These issues should be fully addressed in the justification of the project before it is allowed to proceed further.

Climate change implications

We raise these concerns in the context of global agreement about the urgent need to respond to climate change. This requires dramatic reductions in fossil fuel extraction, and speedy adaptation to changing climatic conditions, including extreme weather events that can threaten infrastructure built to traditional standards.

Climate change is a serious health issue. It affects health directly through extreme events such as heat waves, floods, bushfires, and indirectly via worsening air quality, changes in the patterns of infectious diseases, threats to food and water supplies, and effects on mental health.[3]

We believe that the justification for the Northern Gas Pipeline must also be framed in a larger context than supply, demand and economic cost-benefit. This project will contribute to facilitating the large scale extraction of fossil fuels and the broader impacts of this for climate change at a global level. It will lead to stranded assets and huge loss of investment, when effective carbon pricing is implemented. We are also concerned about the considerable contribution of unconventional gas extraction to methane emissions from fugitive emissions at the wellheads and leakages from or breakages of pipelines. The minimisation of these requires strict monitoring. Methane is a potent greenhouse gas about 25 times stronger than carbon dioxide.

Ecologically sustainable development

In relation to ecologically sustainable development, we make the following points in relation to the precautionary principle.

1. When there is uncertainty we should ensure that human health and the environment are protected
2. Those who would like to undertake a potentially damaging project must demonstrate the lack of harm - not those who would face the risk of the damage
3. We should explore many different alternatives to possibly harmful actions
4. The public should participate in decision making about potentially damaging projects

The key issue here is that the proponents must demonstrate that the process of unconventional gas extraction is safe, rather than the community demonstrate the risk. Alternative options, particularly renewable energy development exist, so it needs to be demonstrated that this project is really the best alternative.

The EIS claims that, consistent with the principles of inter-generational equity, 'the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations', and that the project is 'unlikely to have any residual significant impacts on the environment'.

We argue that the relationship between the pipeline and development of the onshore gas industry, with its inherent methane and carbon dioxide emissions will have a significant impact on the environment into the future. The project cannot be seen to be consistent with the principle of inter-generational equity. Alternative investment in solar and wind energy will have a much more equitable impact on Territorians in the future and will be cost effective as a result of progressively falling costs of renewable energy.

The EIS must address the broader ramifications of the project rather than narrowly maintaining that the impacts are limited to constructing the pipeline.

The principle of integration requires that decision making processes should effectively integrate both long-term and short term economic, social, environmental, and equitable considerations. The EIS for the project must address the long-term economic, social, environmental and equitable considerations associated with climate change. An intensification of the current climate change situation will have a significant impact on communities across the globe, in most cases inequitably. Recent unprecedented storms and widespread blackouts in SA are evidence of the vulnerability to extreme weather events which will increase with climate change.

To be in accordance with the Principle of Integration, the EIS must demonstrate that the Northern Gas Pipeline has integrated the short term and localised justification for the project with the global and long term impacts of further fossil fuel extraction.

The EIS fails to address any alternatives to carry out the project which might better comply with the principles of ecologically sustainable development (as specified in Section 2.5 of the Terms of Reference).

Both in Australia and globally the importance of renewable energy sources is being recognised as we respond to the urgent need to mitigate climate change. This EIS should note such alternatives, as part of its core environmental impact assessment. The possibility for stranded assets and associated environmental degradation is a key to comprehensive assessment of alternatives.

Health impacts

Section 5.3 of the Terms of Reference for the EIS require the assessment of cumulative impacts 'in the context of existing and foreseeable future developments'. Given the intent of the project to stimulate the development of onshore gas exploration, a specific concern that should be addressed as a cumulative effect is the impact of hydraulic fracturing for unconventional gas. The cumulative risks including those to health of unconventional gas development in the Territory should be assessed using the current scenario with 84% of the Northern Territory under application for gas exploration.

In relation to direct health and safety impacts, we note with concern the potential for extensive use of groundwater in very barren environments and the disposal of large amounts of wastewater with contamination potential. It has been noted that with the construction phase there will be an increased risk of traffic accidents causing injury and general increased burdens on local health services. We are not convinced by the evidence presented in the EIS that these risks have been adequately addressed. Furthermore the project needs to be considered as part of the development of unconventional gas in the NT which will impose health burdens on many communities as demonstrated in Chapter 4 of the Interim report of the Parliamentary Enquiry into unconventional gas[4] with inevitable costs to NT health services.

We have recently reviewed the potential health impacts of the unconventional gas industry in evidence given to the Parliamentary Enquiry into unconventional gas mining[5] and we strongly recommend that this evidence is taken into account in the further consideration of the pipeline proposal.

Conclusion

From the perspective of medical practitioners caring for people of NT, DEA is concerned that this project presents a range of risks that have not been adequately considered and which relate directly or indirectly to health and well-being. The larger view of impacts on the climate from unconventional gas development is one of these risks.

References

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[2] http://ieefa.org/wp-content/uploads/2016/05/Pipe-Dream-A-Financial-Analysis-of-the-NEGI-MAY-2016.pdf
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