



EIS General Comments



## General Comments

The respondent comments provided in this section have been collated from all stakeholder submission comments relating to overall comments on the EIS. Please refer to **Attachment A** for copies of all submissions received.

### General

#### Respondent Comment

*Central Highlands Regional Council supports the Gladstone Liquid Natural Gas Project and commends Santos on their initiative in undertaking a resource project of this scale in Central Queensland.*

#### Santos Response

Santos appreciates your support for our project.

#### Respondent Comment

*Department of Environment and Resource Management states that there are components of the project undergoing Front End Engineering Design and in many cases this, along with detailed mitigation measures, are required before a satisfactory assessment of the proposal can be made. Additionally, the information provided in the EIS and draft EMPs is inadequate to enable the DERM to develop conditions that could be applied to the project, should the Coordinator-General recommend it proceed.*

#### Santos Response

Following the publication of the EIS in June 2009, Santos has:

- Continued to refine its design; and
- Undertaken further studies and impact assessment and to complete guidelines and plans for the development to respond to the issues raised in the submission.

This work is reflected in the EIS supplement which includes updated impact assessment; revised mitigations measured and amended EMPs. Through this work it is anticipated that the Coordinator-General and the relevant government agency will have sufficient material to complete the required assessment and to frame conditions that apply to the GLNG Project.

#### Respondent Comment

*Department of Environment and Resource Management states that due to the substantial material to be assessed across the Department and the timeframes imposed, it may be that other issues will come to light as assessment of the project progresses. However, DERM has made every effort to be comprehensive in its submission.*

#### Santos Response

Ongoing discussion with DERM has been helpful in identifying further issues and this has assisted in resolving this concern.

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### Respondent Comment

*Queensland Gas Company supports the strategic development of a major CSG-to-LNG industry in Queensland. Our analysis, which is supported in the GLNG EIS, indicates significant potential demand in Pacific Basin LNG markets, particularly for those projects which can supply LNG commencing between 2012 and 2015. We also believe that Queensland faces considerable competition for this uncontracted demand from projects under development or in advanced planning in Western Australia, the Northern Territory and competing countries.*

### Santos Response

Santos appreciates your support for the Queensland CSG-to-LNG industry.

### Respondent Comment

*Queensland Gas Company states that the GLNG Project along with the QC LNG Project are currently the only two projects of the several proposed for Queensland with significant LNG supply contracts in a market where new LNG contracts are increasingly harder to secure. QGC believes that these two projects represent the most commercially advanced and engineered projects of the several that have been proposed in Queensland. The GLNG and QC LNG projects are in the best position to proceed and to meet the critical LNG supply window identified for uncontracted LNG demand.*

### Santos Response

Santos appreciates your recognition of the GLNG Project.

### Respondent Comment

*Queensland Police Service states that the issues identified in this submission highlight areas of concern to the QPS as identified in the EIS. This submission provides discussion on matters which have been excluded from the EIS or where further information is sought from the proponent.*

### Santos Response

Santos appreciates your feedback on our EIS and QPS comments have been covered throughout this EIS Supplement. The main concerns covered in QPS' submission are addressed in the following sections:

- Cumulative impacts from Santos and other related projects (Part 2, Section 1);
- Heavy and oversized loads (Part 2, Section 4);
- Consultation with QPS regarding strategic planning and resourcing (Part 2, Section 9);
- Engagement with QPS while developing the project's Transport and Traffic Management Plan (Part 2, Section 11); and
- Engagement with QPS while developing the project's Emergency Response Plan (Part 2, Section 13).

### Respondent Comment

*WWF-Australia states they would like to acknowledge the efforts made by Santos Limited to address the likely threats presented by the Gladstone Liquefied Natural Gas Project. We do not doubt the determination of Santos and other joint ventures to manage these risks but are concerned that no amount*

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*of goodwill and effort will reduce the imminent risks to a reasonable level. We would like to confirm that WWF-Australia is not opposed to LNG production in principle; we see LNG as an important source of energy as the global economy begins its transition to sustainable sources of energy. We are interested in minimising the footprint of development in this region and would encourage the Queensland and Australian Governments to help proponents to better achieve this. We would like to make it clear that this submission in no way should be read as a summary of the full range of concerns that WWF-Australia has with this proposal - it does not attempt to be encyclopaedic. Instead we focus only on those concerning impacts on key marine species (marine turtles & inshore dolphins).*

### Santos Response

Santos is committed to using best practice environmental standards and working closely with all stakeholders to ensure the impact of the GLNG Project is minimised. Santos in particular acknowledges the concerns of WWF in relation to the marine species. Since the publication of the EIS, Santos has undertaken additional studies to put in place comprehensive management plans including a detailed Turtle and Dugong Management Plan (**Attachment F5**) which it is hoped will provide further confidence to WWF-Australia.

### Respondent Comment

*The Department of Employment, Economic Development and Innovation recognises the potential benefits of the LNG industry to the regional development of Queensland. The proposed development will contribute to the Queensland Government's job creation target, both through direct employment in construction and operation, and through flow-on employment in the supply chain. The project will increase the value of regional exports and generate income through purchasing goods and services across the region.*

### Santos Response

Santos appreciates your support for and recognition of our project.

### Respondent Comment

*The Department of Employment, Economic Development and Innovation states that this proposed development is a major catalytic development and will contribute to sustainable regional economic development and diversification in both the Roma and Gladstone regions. This will provide significant flow-on effects to supply chain businesses from mining services and other sectors including construction, infrastructure, transport and logistics. Regional economic impacts are comprehensively described and appropriate mitigation strategies provided. The proposed development will contribute to the delivery of Queensland Government initiatives including Centres of Enterprise and Queensland and Australian Government regional development strategies.*

### Santos Response

Santos appreciates your support for and recognition of our project.

### Respondent Comment

*Queensland Treasury states that they wish to advise that they have no comment on the EIS.*

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### Santos Response

Noted.

### Respondent Comment

*Queensland Primary Industries and Fisheries (Department of Employment, Economic Development and Innovation) comments that it generally supports the intent of the project and the significant economic, employment, and regional development outcomes it will deliver amongst a number of other Coal Seam Gas projects to be developed in the near future. However, with these positive opportunities also comes a significant risk for primary industries, fisheries and biosecurity. Throughout the following assessment, a number of recommendations are made with the purpose of minimising the risk of serious impacts whilst capitalising on any opportunities for the following:*

- *Natural resources such as soil, water, aquatic and terrestrial ecosystems which primary industries and fisheries rely upon;*
- *The profitability and productive capacity of agricultural operations in the region; and*
- *The social fabric of associated rural and regional communities which provide the foundation of primary industries.*

### Santos Response

Santos appreciates your support and feedback on our EIS and believes QPIF comments have been covered in the EIS Supplement. The main concerns covered in QPIF's submission are addressed in the following sections:

- Gas transmission pipeline construction and water supply (Part 2, Section 3);
- Avoidance of Class A GQAL in the CSG fields (Part 2, Section 6);
- Impacts of associated water (Part 2, Section 6);
- Impact on marine ecology (Part 2, Section 8);
- Social impact of the CSG fields (**Attachment D1**).

### Respondent Comment

*Submitter number 45 states that they are aware that this project will be a world first for its type (that is CSG to LNG) and as such consider that the Queensland Government should immediately establish an LNG Industry Environmental Management regime, which complies with Commonwealth Government standards.*

### Santos Response

The GLNG Project is to be developed in accordance with the regulatory regimes currently in place at a State and a Commonwealth level and in compliance with applicable industry and other standards. The amendment of the statutory regime is a matter for the State and Commonwealth.