



Section 16

EIS Sustainability

The respondent comments provided in this section have been collated from all stakeholder submission comments relating to EIS Section 16 Sustainability. Please refer to **Attachment A** for copies of all submissions received.

16.1 Introduction

No submissions were received for this section.

16.2 The Concept of Sustainable Development

16.2.4 Principles of ESD

Respondent Comment

Capricorn Conservation Council states that emissions generated in exportation (shipping, trucking, etc.) should be determined and an environmental cost calculated that can be compared against the environmental benefit of domestic use. Capricorn Conservation Council requested that the likely impact of an emissions trading scheme on the Australian demand for LNG be considered, the expected size of the demand be determined and that a proportion of LNG production be reserved for domestic use to meet the demand and prevent unnecessarily high price increases.

Santos Response

Santos has set objectives to ensure that the GLNG Project is a leader in sustainable energy development. Santos' approach to sustainability includes four key focus areas: environment, community, our people and economic. The climate change objective is to apply energy efficient production and processing methods to produce a low carbon intensity energy product.

In September 2009, the Queensland Government released a draft policy framework for the emerging liquefied natural gas (LNG) industry entitled "Blueprint for Queensland's LNG Industry", to provide the community with a clear understanding of the Queensland Government's plans to develop the coal seam gas to LNG export industry. The Blueprint is a comprehensive policy framework covering all aspects of policy which may affect the development of the industry, and included measures to ensure the supply of domestic gas to Queensland homes and industry. The Blueprint outlined two domestic gas reservation policy options being considered by government.

The first option was a Gas Reservation Policy whereby gas producers would be required to sell or make available to the domestic market the equivalent of between 10 per cent and 20 per cent of gas production.

A second option was a Prospective Gas Production Land Reserve, which involved:

- a) Holding back from the market certain prospective gas production areas in order to amalgamate/secure areas for orderly future use;
- b) Stricter application of the requirements that applicants demonstrate, during the assessment of applications for a petroleum lease or a potential commercial area (both of which halt automatic relinquishment), the appropriateness of the area sought for the proposed activities;
- c) Where more active management of relinquishment results in an area being handed back, the State considering if it should then be put back out to the market with a condition that it is to be used only to supply the domestic market; and
- d) Basing decisions to condition such leases for domestic use only on regular estimation of gas supply and demand, combined with market soundings of the availability of gas.

Each of these options were detailed in a Regulatory Impact Statement which was also released on 17 September 2009.

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On 14 November 2009 the Queensland Government announced its decision to set aside future gas fields for future domestic supply if needed (second option) and its rejection of the option to require a percentage of gas from all fields to go to domestic supply (first option).

Respondent Comment

Capricorn Conservation Council states that a key concept of ecologically sustainable development is the Precautionary Principle. It should be adopted legally and morally when assessing whether this project is ecologically sustainable. The Precautionary Principle is provisioned at the Commonwealth level in the EPBC Act and at a state level in the Integrated Planning Act (section 1.2.3) and as such, is very enforceable.

Santos Response

The principles of sustainable development, including ecologically sustainable development (ESD), have played an integral role in Santos' decision making processes in respect of the planning and design of the GLNG Project. Santos is committed to continue to take into account the principles of ESD during the construction, operational, decommissioning and rehabilitation phases of the GLNG Project.

Additionally, as noted this is a key consideration for the Commonwealth and State Governments when assessing this project against the relevant legislation.

Respondent Comment

Capricorn Conservation Council requests that Santos modify site plans to retain RE's 12.2.2 and 12.3.3 on Curtis Island.

Santos Response

The LNG facility site footprint has been modified to minimise impacts to RE 12.2.2 and 12.3.3. Impacts to the Endangered RE 12.3.3 have been reduced by 5.7 ha (a 13 % reduction), and all impacts to Critically Endangered semi-evergreen vine thicket (SEVT) have been removed entirely (**Attachment F2**, Section 3.1.1, Table 3-2).

Unavoidable impacts have been analysed (**Attachment F2**, Section 3.1) and will be offset as per the Environmental Offsets Management Plan (**Attachment D5**, Part 4). The development of an Environmental Offset Management Plan has been undertaken by Santos in conjunction with the 'Ecofund Queensland' state government offset advisory group. The plan being developed specifically addresses the requirements for offsetting under both state and commonwealth legislation. Further, specific detail of the Environmental Offset Management Plan is provided within the **Attachment D5** Part 4.

16.3 The Global Context of the GLNG Project

No submissions were received for this section.

16.4 Santos' Commitment to Sustainable Development

No submissions were received for this section.

16.5 Project Initiatives with Respect to Sustainability

No submissions were received for this section.

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16.6 Review against the Principles of ESD

No submissions were received for this section.

16.7 Matters of National Environmental Significance – Sustainability Considerations

No submissions were received for this section.

16.8 Conclusions

No submissions were received for this section.