Environment Centre NT

Public Submission Guide for the Darwin Pipeline Duplication Project

Make your submission here by 15th of February

Summary

The Darwin Pipeline Duplication Project is a new component of Santos' proposed Barossa gas project.[1] Santos has referred it for assessment to the NTEPA under the *Environment Protection Act 2019* (NT).

The Barossa gas project, if it goes ahead, may be the dirtiest gas project in the world. The offshore Barossa gas field in the Timor Sea, north of the Tiwi Islands, has the highest carbon dioxide (CO2) content of any gas field. The life cycle greenhouse gas emissions of the Barossa project will be 15mtpa, producing more CO2 than LNG.[2] Economist John Robert has called the project a "carbon dioxide factory with an LNG by product".

The Barossa is thus a significant, controversial and high risk project, and ECNT believes its impacts should be rigorously assessed and reviewed by the NTEPA.[3]

ECNT believes that the NTEPA should:

(a) call in a referral under s53(1) of the *Environment Protection Act* of the broader Barossa Project as a whole;
(b) if, the NTEPA does not call in the proposal, the Darwin Pipeline Duplication Project and the broader Barossa Project must be assessed at the highest level – a public inquiry.

What is the project?

Santos already operates a liquefied natural gas (LNG) processing plant at Wickham Point in Darwin (Darwin LNG). Darwin LNG currently processes up to 10 million tonnes per annum of methane gas from the Bayu-Undan field for export as LNG. LNG is a fossil fuel primarily used for combustion to create energy.

Santos now seeks to develop a new fossil fuel resource, the Barossa field, which is 300km north-northwest of Darwin. Methane gas would be extracted from the Barossa field and transported by pipeline to Darwin LNG for processing into LNG for export. The pipeline will traverse two areas within the Oceanic Shoals Marine Park, and will come within 6km of the Tiwi Islands' western coast. It will pass through Tiwi sea country, which is subject to native title rights and interests, but the Tiwi

[1] For more information, see https://stopbarossagas.org/.
[2] For more information, see https://www.jubileeaustralia.org/storage/app/media/uploaded-files/jbic-submission-on-santos-barossa-project-2021.pdf.
[3] For more information, see https://www.jubileeaustralia.org/storage/app/media/uploaded-files/jbic-submission-on-santos-barossa-project-2021.pdf.

have not given their free, prior and informed consent to the project. The Tiwi Islands' western coastline is recognised as a biologically significant interesting area for Olive Ridley turtles and green turtles.

The pipeline for transporting the gas would be either:

a. A 260km pipeline from the field to a tie-in point on the existing Bayu-Undan to Darwin pipeline (Original Pipeline); or
b. A 330km pipeline from the field to Darwin, including a new 100km segment in NT waters and lands, to enable potential use of the Original Pipeline for carbon sequestration (CCS) in the Bayu-Undan field once depleted.

The Pipeline proposed in Santos' referral to the NTEPA is the second option. This will be the third gas pipeline in Darwin Harbour.

The Barossa Project is proposed to first deliver LNG in 2025 and to produce until 2045, subject to potential further expansion to nearby fields for additional fossil fuel production after this period.

What is the submission process?

The Northern Territory Environmental Protection Authority (NTEPA) are inviting public comment on the referral submitted by Santos to construct and operate the 100 km gas pipeline from Darwin to the Barossa gas field in the Timor Sea – this is to facilitate the use of the current pipeline to Bayu-Undan for carbon capture and storage (CCS).

This means that Santos have submitted their plans to the NTEPA, who are now asking the public to comment on these plans so that the NTEPA can decide what level of assessment will be required for the project. Depending on the NTEPA's estimation of the project's impacts, they can require Santos not to have to undergo an environmental assessment (the lowest level of assessment), submit a Supplementary Environment Report, undergo a full Environmental Impact Assessment, or be subject to an Inquiry (the highest level of assessment). We believe that this project should be referred at the highest level of assessment – an Inquiry - and this is what we are calling for in our submission.

What are the problems with the referral and the project?

The Barossa Project is a carbon bomb

The Barossa Project will generate significant global greenhouse gas emissions.

An extreme climate is already threatening key ecosystems in the Northern Territory, including marine ecosystems. Given the critical juncture at which the world finds itself in relation to limiting the worst impacts of human-induced climate change, it is important that the carbon risks posed by the Barossa project are adequately considered.

If approved, Barossa could produce the most carbon intensive LNG in Australia, potentially among the most polluting LNG projects in the world.[4] Adding to the processing emissions, the Barossa gas

[4] https://www.jubileeaustralia.org/storage/app/media/uploaded-files/jbic-submission-on-santos-barossa-project-2021.pdf.

field has very high levels of CO2 (16-20%), which would be vented into the atmosphere. Life cycle emissions could be in the vicinity of 15 million tonnes per annum.[5]

However, the referral document contains no figures or estimates for greenhouse gas emissions associated with the pipeline and broader Barossa project and does not make any reference to the indirect emissions associated with the combustion of produced LNG. This is unacceptable, and must be part of any assessment of the project.

CCS is an unproven technology to reduce greenhouse gas emissions

The Darwin Pipeline Duplication Project is needed to facilitate Santos' plans for carbon sequestration (CCS) at Bayu Undan. However, this technology currently does not work at scale, and is completely untested in an offshore gas reservoir such as Bayu Undan.[6]

Indeed, CCS is being used by Santos to "rationalise – and subsidise – continued investment in fossil fuel infrastructure that would lock in emissions of CO2 and other pollutants for decades to come."[7] The Climate Council has said that CCS is a "licence to ramp up emissions".[8] The Australasian Centre for Corporate Responsibility states that "the rate of CCS project failure is striking: a recent study of all CCS developments in the United States of America (home to a significant majority of the world's CCS capacity) found that more than 80% had ended in failure.[9]

It would be foolhardy and irresponsible for the NTEPA to assess or approve the project without an extensive investigation into the feasibility of the project, through an inquiry. Proceeding with the Darwin Pipeline Duplication Project without a thorough investigation could risk irreversible and significant impacts on Darwin Harbour for zero benefit in terms of reducing emissions from the project.

The last environmental impact assessment for the Darwin LNG facility occurred 20 years ago

The last environmental impact assessment for the Darwin LNG facility (a component of the Barossa Project), occurred in 2002. The operation of the facility is regulated under instruments that are no longer fit for purpose by contemporary standards and in particular the scientific consensus on the growing urgency of the need to reduce greenhouse gas emissions in order to avoid catastrophic climate change.

The project will have significant environmental impacts on Darwin Harbour

The Darwin Pipeline Duplication Project will establish a third significant pipeline in Darwin Harbour, which will have marine impacts on marine ecosystems that are already under pressure from existing gas developments. For example, the number of resident dolphins in Darwin Harbour has almost halved since construction of the Inpex gas plant and shipping channel in 2011.[10] The dredging operation requires 750,000m3 of seafloor in Darwin harbour to be removed and dumped off Lee point. Dredging takes 15 months and means some areas will be off limits to recreational fishers. The

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[5] For more information, see https://www.jubileeaustralia.org/storage/app/media/uploaded-files/jbic-submission-on-santos-barossa-project-2021.pdf

[6] https://ieefa.org/wp-content/uploads/2021/10/How-To-Save-the-Barossa-Project-From-Itself_October-2021_3.pdf.

[7] https://www.ciel.org/reports/carbon-capture-is-not-a-climate-solution/.

[8] https://www.climatecouncil.org.au/resources/what-is-carbon-capture-and-storage/.

[9] https://www.accr.org.au/downloads/accr-ccs-erf-method-submission_july-2021.pdf.

[10] https://www.abc.net.au/news/2018-11-30/darwin-harbour-dolphin-population-decline-worries-scientist/10157960.

pipeline will be laid through the middle of the Charles Point reef fish protection zone. Further industrialisation of Darwin Harbour is likely to be opposed by the community and must be subjected to the most rigorous assessment by the community.

What should I include in my submission?

Your submission should clearly state your answer to the question that the NTEPA is asking, which is: *whether the proposed action requires environmental impact assessment, and if so the required method of assessment.*

Your submission should clearly and emphatically state that the project:

(a) should be called in by the NTEPA, or
(b) should be assessed at the *highest* level of assessment – an Inquiry.

There are many different angles you could take concerning the argument that the project will have **significant impacts** (which is ultimately the criterion the NTEPA will use to determine the level of assessment). You could discuss the greenhouse gas emissions of the project, , the impact on endangered species, the impact on Darwin Harbour. There is more information about each of these areas below and in the links provided.

Important background information

Darwin Pipeline Duplication Project | NTEPA

- This section of the Barossa gas pipeline being assessed only covers the section in NT waters (100km) and does not cover the offshore section out to the Barossa gas field (160km) or the Darwin LNG facility at Wickham point
- The original Darwin LNG (DLNG) facility was given approval in 1998 under the defunct and inadequate Environmental Assessment Act (1982) to produce 3 million tonnes pa of LNG.
- In 2002 DLNG was reassessed under a PER to expand to 2 LNG trains with a capacity to produce 10Mtpa using gas from any field within the Timor Sea
- DLNG received an exceptional development permit to operate in 2002 which has been extended in 2018 for the facility to operate until 2050
- The dredging operation requires 750,000m3 of seafloor in Darwin harbour to be removed and dumped off Lee point. Dredging takes 15 months and means some areas will be off limits to recreational fishers. The pipeline will be laid through the middle of the Charles Point reef fish protection zone.

If you want to talk more broadly about the impacts of the Barossa project as a way to argue for an assessment of the overall project at the highest level, the following resources may be of use: https://stopbarossagas.org/ , Barossa impacts brochure, IEFA report .

How do I make a submission?

Submissions close on 15 February 2022. You can fill out this form on the NTEPA's website to make a submission.

Is there anyone I can ask for help about writing the submission?

Our energy campaigner Jason Fowler is an expert on the Barossa gas project and can answer any detailed or technical questions you have about the project. Jason.fowler@ecnt.org

Naish Gawen at the Environment Centre NT is happy to read over submissions and help you craft the submission so that it is as effective as possible. Don't hesitate to contact him at naish.gawen@ecnt.org