

The NTEPA exists to protect the environment, it is our agent to protect us from the damaging effects of development. In this case, nothing less than a full inquiry will suffice - for both the pipeline project and the whole Barossa gas project that it will support. I understand that this is enabled by s53(1) of the Environment Protection Act. The Darwin Pipeline Duplication Project and the broader Barossa Project must be assessed at the highest level - a public inquiry. The impact on carbon emissions by the pipeline and Barossa Gas proposal will threaten achievement of the Northern Territory's carbon emission targets and obviously contribute significantly to climate change. The carbon emissions for the pipeline must be assessed as part of the whole Barossa Gas project to obtain the real impact and must not be assessed in a piecemeal manner.

The Barossa Gas Project which is the reason for needing this new pipeline, is potentially the dirtiest most carbon polluting gas project in the world. Santos have not consulted with the NT people, nor the Aboriginal communities who will be most affected by the impact of this project. They have a record of riding roughshod over people's rights and regard for environmental regulation as evidenced by the recent Rallen vs Santos case.

Should this pipeline project be assessed?

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Daniel Tapp recently clearly stated in a letter to the editor of the NT Independent...

*"...We want the NT Government to act as a fracking regulator, not a facilitator..."*

*Santos' admission in the NT Supreme Court would indicate that it is a serial offender at least in the NT. If government fails to act with the big stick in the best interests of the communities, environment and water security, they would fail their duty of care and prove they can't be trusted to act in the best interests of our health, businesses, environment, economy and water security that revolves around sustainable development and clean water security."*

While Daniel was referring to fracking and water security, it echoes my sentiments towards facilitation of development of inappropriate industries, such as petrochemical plants for plastics production, now being heavily subsidised by both our Territory Government and Federal Government. Right now, the NT Government "Have your say" website is seeking comments regarding banning single-use plastics. How do we understand this contradiction?

Our direction for development and environmental protection from it, should align with strong principles to reduce environmental damage and climate change impacts. People WANT climate change action and consistency in developments to support that. Not more filthy, industrial, water hungry, toxic gas belching projects such as the petrochemicals industry, fed by gas piped from pristine oceans.

Darwin Harbour is a pristine environment which supports extensive breeding grounds for survival of many varieties of fish and other sea creatures that underpin our lifestyle, tourism and amenity. Dugongs feed on the sea grass. Hard corals, where golden snapper and jewfish feed, are not clearly identified in the mapping of the Santos proposal. These will all suffer from dumping of tons of dredged harbour mud. These species must be protected from months of dredging that will risk their destruction. Monitoring but not protecting the dolphin population in Darwin Harbour has seen it nearly halve since the Inpex development.

But not just Darwin Harbour is at risk. The pipeline will pass through the Oceanic Shoals Marine Park, through the Charles point reef fish protection zone and within 6km of the Tiwi Islands' western coast. It will pass through Tiwi country, which is subject to native title rights and interests, but the Tiwi have not

given their free, prior and informed consent to the project. The Tiwi Islands' western coastline is a biologically significant area for Olive Ridley turtles and green turtles.

The proposed pipeline will also facilitate transport of gas that poses a risk for explosion if leaked into the Harbour. The NTEPA needs to protect Darwin against this risk. The last environmental impact assessment for the existing Darwin LNG (and hence ongoing regulation requirements for) occurred in 2002. Times have changed, scientific knowledge has advanced and our climate has changed. This previous assessment is now irrelevant. A new and thorough NTEPA assessment is required. Only a 100km section of the proposed 260km pipeline is being assessed which does not include the Darwin LNG facility at Wickham Point. This is also an oversight that must be addressed.

Carbon emissions both direct and indirect related to the pipeline must be taken into account. Barossa gas contains high levels of CO<sub>2</sub> (16-20%) which will result in release of world leading levels of CO<sub>2</sub> by this project and the pipeline. These emissions must be assessed as part of the pipeline project for Barossa Gas and not separated out to minimise the apparent impact.

Carbon Capture and Storage (CCS) is proposed to be facilitated. It is proposed to use this pipeline project to facilitate CCS at Bayu-Undan in the Timor Sea. This requires capturing the CO<sub>2</sub>, drying it, cleaning it and then piping it 100km out to Bayu-Undan through the ageing existing infrastructure and burying it 3.5km under the sea.

This alone is a massively energy intensive project, but unfortunately CCS has not proven to be effective. This technology is a smokescreen to reduce public concerns about carbon dioxide emissions. The technology has not been proven to work at scale anywhere in the world. Despite millions of taxpayer funded dollars invested in the Gorgon state-of-the-art CCS project, it has achieved appallingly low rates of carbon capture.

The Australasian Centre for Corporate Responsibility recently pointed out 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."

My wish is that this pipeline does not go ahead at all. The risks are great, climate change is already happening, and I do not wish to see Middle Arm and Darwin Harbour turned into a toxic chemical plant, facilitated by this gas. Production of plastics and toxic chemicals, for consumer products that the world is trying to reduce consumption of is counter to our environmental future. Petrochemical production also emits large quantities of air pollutants that can form acid rain. This is damaging not just for our marine species but also has major implications for health of our population.

My wish is that our decision makers would invest in innovation for cleaner technology that aligns with our local climate and environment. I want to see development investment following principles of minimal water and energy use, which contributes to a sustainable economy and that would help us lead into the next century. Not gas, not fossil fuels that keep us embedded in the last.