

Thank you for the opportunity to comment on the referral of Carpentaria Pilot Project (CPP) EP 187

I recommend the proposal is granted the benefit of assessment at the level of EIA.

The proponent, Imperial Oil & Gas, are to be commended for proactively referring their proposed action. Particularly noting that a similar EMP by Tamboran neglected to do so.

Imperial are correct to identify the risk of carbon pollution exceeding 100k t CO<sub>2</sub>-e pa.

This threshold is significant in two jurisdictions:

In the NT, 100kt is the threshold for the Large Emitters Policy.

Fortunately for Imperial, the NT policy merely requires large emitters to self identify; and either  
\* commit to an overarching target of net zero emissions by 2050 **OR**  
\* give a good excuse why not

NT still has no Climate Act, and although successive parliaments have committed to a long term target of net zero emissions by 2050, the NT has not identified any waypoints – not even a date at which pollution will peak.

At a federal level, 100kt is the threshold for the Safeguards Mechanism. This will require Imperial to negotiate emissions intensity parameters and commit to managing carbon pollution over the activity.

But Australia still has no climate trigger: and so despite threatening to exceed the threshold for active management, this proposed action evades Commonwealth assessment.

The referral report admits:

Flaring the expected ~25 TJ/day ... exceeds the threshold for large greenhouse gas emitters

to address this,

Imperial will apply to the NT Minister .. under Section 57AAA of the Petroleum Act

but no contingency is proposed for the eventuality of non-approval.

Such contingency planning would also be relevant if the proponent has to flare for other reasons, such as delays in establishing necessary infrastructure for transmitting the on-sold resource. The proponent must be required to fully explore all such likely obstacles to the neat plan to launder this 'exploration' project of the carbon burden of its product. The Assessment must be informed by description of contingency actions that will be taken in each case.

Rather than simply indicating their intention to apply for an approval under Section 57AAA of the Petroleum Act, Imperial should draft a Greenhouse Gas Abatement Plan that includes this

application, but also the contingencies that will apply not only in the case that this application is not approved, but in the likelihood that this arrangement is delayed or interrupted.

Public assessment in the context of an EIA is required to adequately address this significant weakness in the proponent's plans to manage this significant detriment of their proposed action.

In other matters:

Waste and Wastewater Management Plan (Appendix 6) tells us:

The above-ground tank lid is purpose built and has been designed: ...  
To be easily installed prior to rain events and removed to assist in evaporation during the dry season

The proponent is challenged to describe how this management proposal sits with the Pepper Inquiry's recommendation

I look forward to engaging with the assessment process as it proceeds

Justin Tutty