

**Attention:** NTEPA

**Re:** Ichthys Carbon Capture and Storage Project

Thankyou for this opportunity to respond to the recent Inpex referrals. I am a local resident who has engaged in decision making around industrialisation of Middle Arm since Philips Petroleum's EDP for Blaydin Point.

Note today I am purposefully replying to two referrals with a single response.

Both referral documents describe an assessment footprint that is deliberately split between project components, and split by jurisdiction. Together they also pitch a future hub or network whose feeders are not yet concretely specified. This combination creates several very predictable cracks where significant impacts can be dropped, diluted, deferred or treated as someone else's problem.

This approach presents likely perverse outcomes that NT and Commonwealth laws are supposed to be alert to and guard against. Explicit referral provisions for components deemed 'part of a larger project' were formulated before sea dumping of carbon was countenanced, but nonetheless were made precisely for this industry, and precisely for this kind of risk. These two sub-projects should be assessed as a single action with cumulative and failure-mode impacts considered holistically.

The two sub-projects are functionally interdependent components of a single integrated system. The environmental consequences of this system arise most acutely during periods of delayed, constrained, or otherwise non-operational storage. Recent aussie experience shows these to be likely eventualities.

We are directed, via:

### **1.6.1 Ichthys LNG AGRU Upgrades and CCS Preparedness Project**

*Add in context for split referral/staged action. (sic)*

to tangential sections in the Ichthys document. Perhaps the sotto voce note should lead instead to the clearer direct section 1.4 in the Bonaparte document. Curious how the proponent's claimed justification for the split actually requires the reader to address both. Perhaps if the explanation for separation only exists when the two documents are read together, then the documents themselves demonstrate functional integration, not independence.

Justifications offered in the Bonaparte document, circling administrative detail of different joint ventures, are not appropriate grounds for split assessment. Ownership and management structure are orthogonal to environmental impact.

The referrals imply that the feedstock relationship is not exclusive, so that the two are not a single locked-in system. This justification does not survive extrapolation in any direction, be it delay, expansion, partial or even parallel operation.

We are assured that geographic separation justifies analytical separation, but that's not how ecology works: geographic boundaries are not necessarily bioregional. Shared pathways propagate impacts across geographic space. Our shared environment does not know jurisdictional bounds.

The repeated claim that the referrals have considered cumulative impacts is irrelevant: what matters is what the assessments consider, and the inappropriate split referrals invite an approach that carries significant risk of inattention to cumulative impact.

The Ichthys referral explicitly and repeatedly invites us to assume '*constant operability of the CCS system,*' but identifies other scenarios with impacts that fall between the scopes of the two referrals and are therefore at risk of being unassessed. This is precisely the circumstance that "part of a larger project" provisions are intended to address.

None of the weak excuses offered reinforce the others. Together, they are inadequate justification for the risk inherent in split assessment.

Despite the general reliance on a convenient *constant operability* ideal, both documents acknowledge emergency, upset and off-spec scenarios. There is no system-level failure-mode analysis of the integrated system, despite both sub-system referrals acknowledging scenarios off the happy path whose impacts fall between their respective scopes.

These are significant likelihoods for particular consideration re the AGRU plans, transforming the project from carbon waste governance to immediate harm to both the surrounding environment and the human health of nearby suburbs. That likely risk lives precisely in the gap between the two referrals. I note that this may be well informed by relevant pending investigations.

Given this real and significant risk, which has been inadequately managed to date, not only must likely scenarios of late state, low storage, partial operation or temporary shutdown be fully considered, they must be fully considered in the context of the full project, not those components which conveniently align with the proponent's internal administrative configuration. Further, there should be a single cumulative impact study that considers the full Middle Arm Development (MAD) precinct cluster's risk load on Inpex's CCS plans.

The two projects should be assessed as a single action with cumulative and system-level failure-mode impacts considered together and up-front.

I remain interested to contribute to improved decision making around industrialisation of Middle Arm.

Justin Tutty