

NT Environmental Protection Authority
Level 1, Arnhemica House
16 Parap Road PARAP NT 0820

Submission on Santos' Barossa Darwin Pipeline Duplication Project

Dear NT EPA,

Thank you for the opportunity to comment on the Supplementary Environment Report (SER) of the Darwin Pipeline Duplication Project.

I am writing today to express my strong concern for the risks and impacts this project will facilitate as a key and smaller piece of a larger and high-risk project – the Barossa project. In particular, I am concerned with the following issues:

- **The amount of Greenhouse Gas (GHG) emissions this project will facilitate:** This project will facilitate the emission of an amount of GHG emissions that is unacceptable in our current climate crisis context, ignoring international calls from the United Nations, the Intergovernmental Panel on Climate Change and the International Energy Agency (IEA) to stop developing or expanding new fossil fuel projects. Although the GHG emissions of this specific pipeline duplication project may be relatively small, according to Santos' own estimates, the lifecycle emissions of the Barossa project would be 296Mt Co₂-e, which is at least 16 times higher than NT's total annual emissions for 2018 (18Mt Co₂-e). Further, Barossa gas has an extremely high Co₂ content (at 18%), which means that very little gas will be produced per tonne of emissions produced.
- **The lack of detail and uncertainty around the rationale of the project - capture and storage (CCS) at Bayu-Udan:** As stated in the SER, the purpose of the Darwin pipeline project is to "allow for the repurposing of the existing Bayu-Udan to Darwin pipeline to facilitate carbon capture and storage (CCS) options" (pg.17). However, there is still no guarantee that CCS will be implemented at Bayu-Udan. Further, there is no evidence that Santos is serious about pursuing its CCS project at Bayu-Udan; Santos have stated that they are willing to use offsets to meet their requirements under the Safeguard Mechanism until Bayu-Udan CCS is in operation, but are not pursuing required approvals to realize the CCS project. Santos' justification does not detail the expected amount of Co₂ to be captured, the additional emissions created, and net emissions reduction anticipated from a CCS project. CCS is notorious for being unreliable and underperforming on emissions reduction promises. Further, previous analysis of potential for CCS at Bayu-Udan has suggested no net reduction in emissions because of the high level of emissions involved in transporting and compressing carbon dioxide. If this is the case, this project is unnecessary and poses unacceptable risk. In addition to this, there is no confirmation that the existing pipeline infrastructure is appropriate for transporting carbon dioxide, which requires reengineering to avoid corrosion and other effects of concentrated Co₂. At the time of publishing the SER, Santos is still awaiting a

Statement of Conformity to establish the possibility of using existing infrastructure for CCS.

- **The poor alignment with and application of the key principles of Ecological Sustainable Development:** this project does not respect some of the key principles of Ecological Sustainable Development (which are addressed in the SER). This includes the Precautionary Principle and the Principle of evidence-based decision-making, in particular in regards to uncertainty around CCS at Bayu-Udan referred above and overall data deficiency in relation to marine megafauna and ecosystem dynamics in the Harbour. The GHG emissions this project will facilitate also does not respect the Principle of intergenerational and intragenerational equity, due to the impacts this will have on our climate, and the health and wellbeing of our children.

For the reasons provided above, I request that you reject Santos' proposal to build a new Darwin pipeline.

Kind regards,

Janina Catalao Dionisio Murta