

Submission on the referral

Imperial Oil & Gas Pty Ltd – Carpentaria Pilot Project

This submission is made under regulation 53 of the Environment Protection Regulations 2020

Government authority: Department of the Chief Minister and Cabinet

Summary: Information in the Referral indicates that the proposed activity has the potential to generate significant economic and social impacts, both positive and negative. The Referral requires additional information to support assessment of potential significant impacts.

Section of Referral	Theme or issue	Comment
Referral report p41. Referral Appendix 00 EMP p54 Sec 1.5 Table 1.5-1; p57 Sec 1.6 Figure 1.6-2; p151 Table 3.10. Appendix 10 Part 1 p18	Community and economy Issue: Overall workforce impacts and employment impacts	<p>The project's workforce could have a significant impact (positive or negative) resulting from the temporary influx of people into the region and from opportunities for local, regional and NT employment.</p> <p>The project requires a significant peak workforce of ~275 in 2024 and workforces of 50 - 150 in the 2025 and 2026 dry seasons. After this, a workforce of ~50 in the 2027 dry season reduces to ~7 jobs ongoing which is a significant decline.</p> <p>The Referral briefly describes local/regional employment opportunities including through contracted activities, and stakeholder engagement indicates expectations for such jobs.</p> <p>Recommendation: Assessment of the significance of potential impacts resulting from the project workforce would be supported by including further information on:</p> <ul style="list-style-type: none"> proposed workforce numbers and composition, for construction and separately for operation, including proposed geographic source (e.g. FIFO/DIDO), skill level and employment duration. local/regional/NT training and employment opportunities, including for those under contracting arrangements.
Referral Appendix 00 EMP p115 Sec 3.4.5, p148 Sec 3.10, p274.	Issue: Workforce accommodation impacts	<p>Workforce numbers over the first two to three years of the project have the potential to result in significant accommodation impacts. Details of workforce accommodation, including the workers camp, and of the assessment and mitigation of associated potential impacts and risks, are limited in the Referral and Appendixes.</p> <p>Recommendation: Assessment of the significance of the potential impacts of workforce accommodation demands, and of onsite workforce accommodation, would be supported by additional and consolidated information, including:</p> <ul style="list-style-type: none"> accommodation requirements (local, regional and Darwin/Alice Springs requirements) and plans for the proposed workforce, including the workforce related to contracted activities associated with the project details on the workers camp, such as accommodation capacity, workforce transport, and strategies to manage alcohol, other drugs and other potential impacts and risks related to camp accommodation. where the workforce is to be accommodated elsewhere to the workers camp, details on the availability of accommodation and any associated potential impacts and risks.

Environmental impact assessment under the Environment Protection Act 2019

<p>Referral Appendix 00 EMP p18-19 , p149 Appendix 10 – Part 1, p.17, 18,</p>	<p>Community and economy Issue: Procurement and business opportunities.</p>	<p>The Referral briefly describes procurement opportunities which have the potential to provide significant opportunities for businesses in the region and the NT. Stakeholder engagement also indicates expectations for such opportunities. Limited information is however provided on how opportunities will be achieved (beyond the business register on the Industry Capability Network webpage) and on any competitive risks associated with an increased demand for goods and services.</p> <p>Recommendation: Assessment of the significance of the potential impact of procurement opportunities and risks associated with the activity (including through contracted activity) would be supported by additional information, including:</p> <ul style="list-style-type: none"> • specific opportunities for procuring goods and services through regional/NT suppliers and potential quantum of demand and regional/NT economic benefit • baseline assessment of existing suppliers in the region and capacity to engage in opportunities resulting from the project.
<p>Referral Appendix 00 EMP p. 149 - 152</p>	<p>Community and economy Issue: Cumulative impact</p>	<p>The region is experiencing significant investment and economic development interest and activity. Assessment of cumulative impacts requires consideration of the project within a broader spatial and temporal context, ideally with regard to the objectives of the NT EPA's <i>Guidelines for the preparation of an economic and social impact assessment</i> (NT EPA, 2013).</p> <p>Recommendation: Assessment and analysis of the significance of potential cumulative impacts of the proposal would be supported by consideration of baseline information on the regional community and economy, current and near future developments in the region. This work could build on the Strategic Regional Environmental and Baseline Assessment (SREBA) and include consideration of:</p> <ul style="list-style-type: none"> • local, regional and NT-wide sector workforce demands and supply capabilities • local Aboriginal employment, existing skills and supply, competing sectors, educational attainment levels and training opportunities • the current base for local, regional and NT businesses, current and future demand and supply capabilities • the socio-economic and cultural context of the region including community priorities and aspirations • cumulative traffic impacts, especially for the Carpentaria Hwy (building on and explaining Table 3.10 App 00 p151 data)
<p>Referral Form, p3 Referral Appendix 10, Part 1, 2.4.1, p.9; Appendix 10, Part 3, p.18)</p>	<p>Community and economy Issue: Stakeholder engagement</p>	<p>The Referral includes a stakeholder engagement and consultation plan and a report and log of consultation that has occurred up to December 2023. The Referral references consultation being progressed with Traditional Owners of EP 187 through the NLC on the Annual Work Program and the negotiation of a Beneficial Use Agreement. The outcomes of this negotiation, and a further application for Ministerial approval, is required to determine options to be progressed for project activities related to the recovery of petroleum during the appraisal phase.</p> <p>Recommendation: Assessment of the significance of potential impacts of the proposal would be supported by confirmation of Traditional Owner agreement for project activities and required Ministerial approvals.</p>

(Note, the material presented in EMPv1 differs from that used in EMPv1a so page number referrals may need adjusting)