

NT Environmental Protection Authority
Level 1, Arnhemica House
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Middle Arm Sustainable Development Precinct Referral

To Whom it May Concern,

Thank you for the opportunity to comment on the Terms of Reference (ToR) for the proposed 'Middle Arm Sustainable Development Precinct'. This submission is made by the Darwin Parents for Climate Action group. Our group represents many families in the Top End and we are united by our pressing concern about climate change and the harmful impacts it will have on young people in the NT now and into the future as they grow up in a hotter and more dangerous climate.

Darwin Parents for Climate Action is dedicated to advocating for a safe and healthy environment and climate for our young people. This is our one goal, and that is why we are so alarmed by the proposed 'Middle Arm Sustainable Development Precinct'.

This proposal with the inclusion of petrochemical manufacturing poses a very real and immediate risk to the health of families living in Palmerston, merely three kilometres from the proposed development. It also relies on the development of new gas fields to fuel the proposed industries – gas fields that will significantly increase Australia's Green House Gas (GHG) emissions and contribute to warming our already hot climate.

Petrochemical Manufacturing

We are familiar with the story about an area along the Mississippi in Louisiana dubbed 'cancer alley' where there is a high concentration of petrochemical plants and cancer rates are well above the national average. The Middle Arm Precinct poses a real risk of significant impacts on human health due to carcinogenic pollutants being emitted.

This is hugely concerning for us and it is unfathomable that the Northern Territory Government (NTG) is putting forth such a proposal, and furthermore, that so much public money is being allocated to it. A petrochemical plant should not be allowed to be built so close to a residential area – we do not want our own cancer alley in here in the Territory. We fail to see any public benefit that justifies the risk the proposal poses to people's health.

Increase in GHG emissions

The International Energy Agency (IEA) stated last year that globally we cannot start or expand any new fossil fuel projects beyond 2021 if we are to reach a target of net zero by 2050. The Precinct proposal flies in the face of that warning and appears to be a concerted effort to support and justify the expansion of the gas industry in the NT.

We understand the need for and support industry and jobs in the NT, however, we do not believe the benefits are worth the enormous risk when considering the impacts on health, the environment and the climate that will result from the Middle Arm Precinct and from the related expansion of the gas industry.

Also of concern is the inclusion of a Carbon Capture and Storage (CCS) facility. Our concern is that CCS is being used by fossil fuel companies to 'green wash' their operations and justify further extraction. The largest CCS project in the world was the Gorgon Carbon Storage Facility in WA operated by Chevron. It was revealed last year that this was a total failure barely meeting 30% of their carbon capture target. Furthermore, it remains to be seen how secure the storage is of captured emissions and whether or not there is leakage over time.

We reject CCS as being a genuine carbon offset and believe the Middle Arm Precinct and the related expansion of the gas industry will prevent the NT from being able to meet its target of net zero GHG emissions by 2050.

Transparency

There is concerning lack of transparency around the project. With the NTG as the proponent the public is in the dark about what private companies will be operating from the Precinct. We know the NTG has decided to apply a Strategic Environmental Assessment (SEA) process to this project. However, we would like to see each private company involved to have to go through a separate Environmental Impact Assessment (EIA) process so the impacts of their specific enterprise can be assessed and scrutinised by the public and they can be held to account if communities or the environment is adversely impacted by their operations.

Request for a Public Inquiry

The proponent's own statement of reason for justifying a SEA lists extensive and alarming potential impacts resulting from this development. The list is extremely concerning and suggests 'significant impacts' will occur or may occur as a result of this project, including significant impacts on: air quality, marine and sediment quality, soil quality, biodiversity including threatened species, the NTG's ability to achieve their GHG emissions reduction targets and potential significant impacts on communities including Aboriginal peoples, their cultural heritage and sacred sites. We believe the level of risk is unacceptable and we are taking this opportunity to make it clear that we strongly object to the proposed development.

Given the proponent has listed so many 'significant impacts' that will or may occur we would like to see the NTEPA hold a public inquiry into the environmental, social, cultural and atmospheric impacts of the proposal.

Failing that the ToR must include extensive community engagement including public forums and meetings. We would like to see meaningful consultation with Larrakia Traditional Owners to ensure their cultural values are protected and their wishes for their sovereign lands and waters are respected. We would like to see robust and independent analysis of the emissions this proposal will generate and how it will impact the NT's emissions profile and net zero target. We would also like to see an independent human health impact assessment given the high risk of adverse health impacts from petrochemical manufacturing.

We cannot overstate how alarmed we are about the proposed Precinct development and the irreversible and lasting impacts it could have on public health, our local environment and the climate. It is perverse that more than a billion dollars of taxpayer money is being allocated to support this project, including direct funding to gas companies, which could increase our risk of cancer, threaten our biodiversity and valued recreational activities and

will contribute to making our climate more unstable and dangerous for our children. The Middle Arm Sustainable Development Precinct needs to be subjected to the most extensive and robust assessment process and provide sufficient opportunity for public engagement on the proposal.