

La'ó Hamutuk

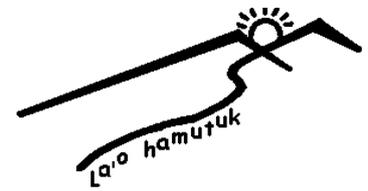
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Submission to the
Northern Territory Environment Protection Authority

from the
Timor-Leste Institute for Development Monitoring and Analysis
La'ó Hamutuk

regarding the proposed
Darwin Pipeline Duplication Project

28 June 2023

Greetings from your neighbours across the Timor Sea.

La'ó Hamutuk (the Timor-Leste Institute for Development Monitoring and Analysis) is a Timorese, independent, non-partisan civil society organization. For two decades, we have closely followed issues in Australia and Timor-Leste, including many oil and gas activities which affect both of our peoples and environment. La'ó Hamutuk has made a dozen submissions to government agencies in Australia, as well as hundreds to Timor-Leste's government and its international development partners. We hope that our information and analysis will help you make wise decisions which protect the environment and the people of both the Northern Territory and Timor-Leste.

La'ó Hamutuk analyzes and monitors the activities of the Timorese Government and its neighbours and development partners, advocating for sustainable and equitable economic and social development. Through this work, we try to ensure that our country's hard-won sovereignty is recognized and that all of Timor-Leste's people – both women and men, current and future generations – can participate in sustainable, just, inclusive and transparent development which respects human rights and people's cultures.

In February 2022, we made a submission to the NT EPA on the scope of the DPD evaluation process, and we thank you for following some of our suggestions, especially in regards to asking for some information about Scope 3 greenhouse gas emissions and the entire pipeline-Barossa-Bayu-Undan CCS project. However, we remain concerned about the impacts of this project on global climate change and on Timor-Leste, so we are making another submission to this round of consultation.

Relationships across the Timor Sea

As you know, Timor-Leste and Australia have had a troubled history for most of the last half-century. We believe that the 2018 Maritime Boundary Treaty marked a change to a more respectful and considerate relationship, which your oversight of this DPD project can exemplify.

Like the Northern Territory and the Australian people, Timor-Leste has received substantial benefits from the Bayu-Undan oil and gas field and the Wickham Point LNG plant, which we appreciate. Nevertheless, we remain aware that Australia has taken in about \$6 billion from oil and gas fields that your government now agrees are in Timor-Leste's territory, and that Australia has prosecuted 'Witness K' for trying to make the negotiations between our countries less unfair. However, we would like to move forward.

Apparently, Santos does not consider our organization, or anyone in Timor-Leste, to be a "stakeholder" in this project. This may not be important, as the company appears to believe that the role of stakeholders is to listen to their plans, not to influence them. We hope that NTEPA has a different view.

This project will impact yourselves, your neighbours and the world.

Our submission is written from a Timor-Leste perspective, and we don't presume to speak for the people of the Northern Territory. We encourage you to carefully consider issues raised by people there, including by Aboriginal and environmental organizations.

The NTEPA should examine the entire Barossa-pipeline-LNG-CCS project, not only the part of it which is within the Northern Territory, since it affects your neighbours and the global climate. Environmental risks don't stop at state boundaries or three miles offshore; they are not constrained by the 200-mile EEZ. In the SURF proposal for Barossa, the potentially affected area (EMBA) includes much of Timor-Leste's coastline.

Gas extraction from Barossa and carbon storage at Bayu-Undan may be outside your territorial jurisdiction, but they are intrinsic elements of the proposed DPD project, which is why NTEPA asked Santos to provide more complete information on project-level GHG emissions. Please consider the impacts outside the Northern Territory, some of which could endure for centuries, while you look into the local implications of this project.

A piecemeal approach to a project across multiple jurisdictions does not adequately protect our common welfare. Overarching issues might fall outside of each authority's localized mandate and be overlooked – there is more to this project than the pipelines currently before you. Furthermore, if some regulators are less experienced or are overly influenced by corporate pressure, others, including yourselves, need to step up and exercise their responsibilities effectively.

As you know, the DPD has no purpose if Barossa is not developed, or if the Bayu-Undan CCS project in Timor-Leste does not go ahead. Our people have just elected a new Parliament; a new government will take office next week, with changes in leadership at ANPM and other agencies. It remains to be seen if they will continue promotion of CCS begun by the outgoing

Government – and whether the people of Timor-Leste will find it in their interest to do so. Although Santos may want to proceed with the DPD component to build momentum and investment in the entire project, regardless of its utility, that should not be the goal of regulators like yourselves.

Carbon Capture and Storage is not a solution.

Santos floated the idea of Carbon Capture and Storage (CCS) at Bayu-Undan to enable developing the carbon-intensive Barossa gas field, a greenwashing strategy to confuse the public about the damage they will inflict on the global climate. CCS is not “proven as a large-scale CO₂ storage solution.” Santos’ claim is not borne out by worldwide experience – and CO₂ “storage” is not the same as reducing CO₂ emissions. Please do not be taken in by Santos’ assertions, and do your own objective, environmentally-focussed research.

NTEPA’s mandate is to protect the environment, not to facilitate public relations efforts intended to prolong the operations (and profits) of the globally-environmentally-destructive fossil fuel industry. In the project alternatives described in Santos’ Supplementary Environmental Report, they failed to consider the “no project” option. Please do not make the same mistake.

“Net Zero” is a misleading concept. Even if the CCS project at Bayu-Undan works as Santos promises, it may not reduce the overall carbon dioxide emissions from extracting and liquefying the natural gas from Barossa, which is one of the dirtiest gas fields in the world. Furthermore, inevitable leaks of methane from the wells, pipelines and LNG and regasification facilities, as well as the CO₂ released by burning Barossa-sourced gas elsewhere on our planet, will significantly exacerbate the consequences of global climate change.

Climate change is real.

Please do not enable long-lasting devastation of the climate, with severe human consequences, to enable a few decades of financial gains by Santos and their partners. Although we have not experienced the impacts of climate change on the Northern Territory, we know only too well the calamities it has already brought to Timor-Leste, including the floods which killed more than 40 people and displaced 15,000 two years ago, and the increasing precariousness that unpredictable wet seasons inflict on our agricultural production every year. The future will be far worse if environmental regulators like yourselves lack the courage to take serious action.

Each person in Timor-Leste is responsible for about 0.5 tons of CO₂ emissions per year. Each Australian is responsible for 30 times that much, not counting the Scope 3 emissions where each of our fuel exports are burned. Santos rationalizes the additional GHG which will be emitted from Barossa and the DPD because it is only ~0.02% of Australia’s total emissions – as if adding fuel to a forest fire was a good idea. Australia needs to drastically reduce its role as a climate destroyer – not justify adding to the destruction because it is already so damaging. Mere compliance with legislative requirements is not good enough.

Table 7-3 of the SER itemizes the “consequence categories adopted in the risk assessment” but has no entry for Atmospheric Processes, even though they are listed in section 7.4.2. Whether or not Santos considers its GHG emissions to be “planned,” they should not be overlooked – they will have impacts both outside and within the 25-km radius of Darwin Harbour “selected” by Santos.

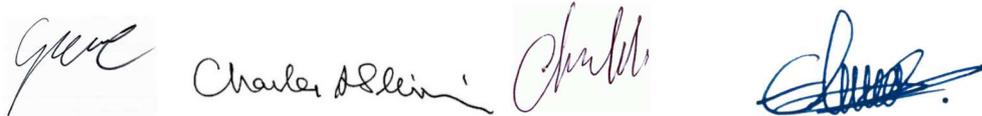
Why should Timor-Leste be saddled with the responsibility, and the risks, of Barossa’s CO₂ so that Australian companies can extract and export more fossil fuels from deposits under Australian waters?

Conclusion

We trust that the good people of the Northern Territory will put a stop to this effort at “carbon colonialism” before it gets too far. Thank you.

This concludes our submission to the NT Environmental Protection Authority, and we are grateful for your attention to our concerns. We are happy to answer any questions or to provide additional information regarding issues discussed in this submission.

This submission is authorized by our organization, including for publication.



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