



Australian Marine Sciences Association Inc.

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Paul Purdon
Executive Director
Environmental Assessment and Policy
NT Environment Protection Authority

By email: eia.ntepa@nt.gov.au

1st June 2023

Dear Mr Purdon

Re: Santos Darwin Pipeline Duplication Supplementary Environmental Report – Formal Request for Extension of Public Submission Period

In relation to the call for formal public and stakeholder comment on the recently released Darwin Pipeline Duplication (DPD) Supplementary Environmental Report (SER) on 24 May 2023 by the NT EPA - under regulation 50 of the Environment Protection Regulations 2020 (EP Regulations) – we would like to kindly request a 3-4 month extension of the public submission period.

The Australian Marine Sciences Association Inc. (AMSA) is of the firm belief that a total of 35 days (or 25 days, excluding weekends) is grossly insufficient time to read, adequately assess/review and provide appropriate technical comment on DPD SER. AMSA notes that the current documentation includes almost 3,000 pages of detailed technical documents and appendices, including several new detailed assessments/studies (see Table 1).

The Australian Marine Sciences Association Inc. (AMSA) is Australia's peak professional body for marine scientists from all disciplines and for over 50 years has promoted all aspects of marine science in Australia. Including "dissemination of knowledge about the marine environment to the wider public."¹ It also has a long history of providing expert scientific advice to Federal and State/Territory governments, industry and other key marine environmental stakeholders, on a wide range of scientific and environmental issues and activities in the marine environment (including environmental impact assessments, marine pollution, Marine Parks, marine threatened species, marine biodiversity and climate change). All of our Submissions are publicly available here: <https://www.amsa.asn.au/submissions>.

The AMSA Northern Territory Branch is based in Darwin and in recent years has been active in providing technical input to the management of the North Marine Parks Network in northern Australia, as well as providing formal submissions on a range on marine science, marine environmental, Indigenous sea country and marine industry-related issues. Including providing inputs on proposed offshore oil/gas developments.

To-date AMSA (and also, Professor Karen Edyvane, President of the AMSA-NT) has already provided detailed scientific and technical comments and feedback on the Santos Offshore Gas Project, and the Santos Darwin Pipeline Duplication Project – and also, the proposed Middle Arm Sustainable Development Precinct. We note that many of AMSA's comments have also improved the overall technical quality and robustness of the environmental assessments.

¹<https://www.amsa.asn.au/mission-objectives-and-values>

| SANTOS 'Darwin Pipeline Duplication Supplementary Environmental Report' (SER) | |
|--|--------------|
| Title of Document | Pages |
| Guidance for Stakeholders - Public Submissions on Environmental Impact Assessment (NT EPA) | 10 |
| Darwin Pipeline Duplication Project - Supplementary Environmental Report (SER) | 433 |
| SER Executive Summary | 43 |
| Appendices | |
| Appendix 1: Additional information requirements for the Supplementary Environmental Report | 5 |
| Appendix 2: Register of all submissions and responses received for the DPD Project | 46 |
| Appendix 3: Sediment Dispersion Modelling Report | 165 |
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| Appendix 5: Treated Seawater Discharge Modelling Report | 35 |
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| Appendix 7: Draft Marine Megafauna Noise Management Plan | 112 |
| Appendix 8: Underwater Noise Modelling Report (Talis Consultants, 2023) | 142 |
| Appendix 9: Underwater Noise Modelling Report – Rock Breaking Tools (Connell et al., 2023) | 74 |
| Appendix 10: Traffic Impact Assessment | 116 |
| Appendix 11: Draft Onshore Construction Environmental Management Plan (CEMP) | 107 |
| Appendix 12: Draft Acid Sulfate Soil and Dewatering Management Plan | 59 |
| Appendix 13: Stakeholder Engagement Plan (SEP) | 45 |
| Appendix 14: Darwin Harbour Lighting Impact Assessment | 15 |
| Appendix 15: Hydrocarbon Spill Modelling Report | 151 |
| Appendix 16: Maritime Archaeology Heritage Assessment | 228 |
| Appendix 17: Threatened and Migratory Species Likelihood of Occurrence Assessment | 18 |
| Appendix 18: Draft Offshore Construction Environmental Management Plan (CEMP) | 231 |
| Appendix 19: SER Contributors – Qualifications and Experience | 7 |
| Total Pages | 2807 |
| Total Pages (Appendices) | 2321 |
| NT EPA Notification - 24 May 2023 | |
| Closing Date for Submissions - 28 June 2023 (35 days total - or 25 days, excl. weekends) | |
| Review Period for Public Submissions = 35 days total (or 25 days, excl. weekends), ie. <u>112 pages per day</u> | |

Table 1 – Overview of the technical documentation (and time for stakeholder consultation) for the Santos Darwin Pipeline Duplication Supplementary Environmental Report.

AMSA looks forward to the opportunity to provide detailed technical comment on this very important development. And as requested, an extended public submission period on the Santos Darwin Pipeline Duplication SER – to enable appropriate and adequate consultation and review of all the relevant detailed information provided.

Yours Sincerely



Karen Edyvane, PhD

On behalf of Australian Marine Science Association