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Submission details:

Thank you for the opportunity to make a submission on the Ichthys Onshore Carbon Capture and Storage referral. I am a long-term Territory resident and parent of young children. I write to express serious concern that this referral does not meet the NT Environment Protection Act's requirement to protect human health as a recognised environmental value, considering potential impacts through air, water, soil, and community wellbeing. A primary concern is the proposed removal of existing acid gas incinerators (AGIs), which currently manage hazardous air toxics like benzene (a BTEX compound) and hydrogen sulphide (H<sub>2</sub>S).

The referral replaces this with reliance on carbon capture and storage (CCS) offshore injection of a CO<sub>2</sub> stream that contains these pollutants. This removal creates a significant risk to air quality and human health, as any malfunction, maintenance outage, or underperformance of CCS would cause the venting or flaring of toxic gases directly into the atmosphere of Darwin and Palmerston. The referral understates this risk by assuming continuous, flawless CCS operation and does not adequately assess emissions during system outages or commissioning phases. Inpex's documented history of underreporting benzene emissions further amplifies concern. The World Health Organization states there is no safe level of benzene exposure, a known carcinogen linked to blood disorders and respiratory illnesses. Children, in particular, are vulnerable to these impacts. Soil impacts are also likely as the pipeline traverses acid sulphate soils, which can release heavy metals and alter pH when disturbed, yet the referral does not sufficiently address these risks or how they may affect local ecosystems and human health. Community wellbeing is jeopardised by the increased risk of air toxics exposure and the lack of contingency if CCS fails.

The project thus fails to uphold the NT EPA's mandate to protect human health across all relevant pathways. Further, the referral assesses only the onshore pipeline and infrastructure in isolation, without accounting for its integration with the much larger Bonaparte Basin CCS project. This fragmented assessment obscures cumulative risks and the true environmental footprint. For these reasons, this referral should be determined unacceptable under section 57(2)(d) of the NT Environment Protection Act 2019. More comprehensive assessment of human health risks via air, water, soil, and community wellbeing pathways must be undertaken before approval.