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Submission contents:

Please accept this submission on the referral of the Carpentaria Pilot Production Project by Imperial Oil and Gas. The following point should impact your decision: Imperial claims falsely that the impacts of greenhouse gas will be reduced or completely removed by the sale of appraisal gas, but shifting emissions downstream does not alter the impacts of those emissions on climate change. Details critical to your understanding in regard to your objective of zero emissions by 2050 have NOT been noted in Imperial's submission, or indeed when they would occur. Imperial has omitted to note the significant additional potential impacts relating to groundwater extraction, risks of crosscontamination and the induced seismicity caused by hydraulic fracking and the wastewater storage management system proposed in the EMP. The referral documents provide insufficient information to fully assess the potential risks of the Pilot Project for your organisation to be completely satisfied about the acceptability of those risks. Information missing includes groundwater testing and drawdown modelling, surface water hydrology and detailed plans for the waste water management system. Conclusions that this industry will not pose a significant threat to nationally threatened and migratory species is contrary to evidence, and the work provided to the EPA by Imperial shows serious flaws in the survey effort and assessment of these species. Due to a postponed meeting with Traditional Owners due for late 2023, it seems that Traditional Owners have not been provided opportunities to contribute vital local knowledge about water impacts and biodiversity to this decision making process. I would be obliged if you would carefully consider these points in reaching a decision in line with your stated aim of net zero emissions by 2050.