

We honour the Larrakia People as Traditional Owners of Darwin and we honour all Traditional Owner groups across the Northern Territory. We pay our respects to the Elders past, present and emerging. We recognize that all the Northern Territory is Aboriginal land and that sovereignty was never ceded from these lands and waters.

Darwin Pipeline Duplication Project - NTEPA submission

Dear NTEPA,

Thank you for giving the public the opportunity to make comment on the proposed project by Santos – the Darwin Pipeline Duplication Project (DPDP) – which is a key component of Santos’ future proposal to develop the offshore Barossa gas field.

This submission has been lodged on behalf of Australian Parents for Climate Action Darwin and NT. We represent over 150 (and counting) local parents and carers of children in Darwin and elsewhere around the Territory who are deeply concerned about climate change and what the future will look like for our children. Our only agenda is that we want a healthy, liveable climate for our kids to grow up in – with every opportunity to know and love the ‘Nature Territory’ as our childrens parents, grandparents and Elders have.

Santos’ referral report claims that the project will have minimal environmental and social impacts. Australian Parents for Climate Action Darwin and NT have read Santos’ referral report thoroughly and find this assertion absurd. Both the social and environmental impacts of this project are highly significant and will have profound negative impacts on future generations of Territorians and our natural environment.

As such, we strongly urge the NTEPA to take this assessment through the highest possible scrutiny in order to genuinely allay community concerns – and that is through a Public Inquiry.

Specifically, we wish to see the NTEPA:

- (a) call in a referral under s53(1) of the Environment Protection Act of the broader Barossa Project as a whole;**
- (b) if, the NTEPA does not call in the proposal, the Darwin Pipeline Duplication Project and the broader Barossa Project must be assessed at the highest level – a public inquiry.**

We have addressed several issues of deep concern within this submission and sincerely request that the NTEPA consider these concerns within the current context of the climate catastrophe – and the fact that this is our last decade to limit irreversible damage to our climate and all our futures.

Context in which the NTEPA must assess this pipeline proposal:

Santos has referred the construction of new pipeline for assessment by the NTEPA. However, the construction of any new gas pipeline must be assessed

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within the context of its intended use – to transport and utilise the worlds dirtiest, most methane-polluting gas.

Should the NTEPA assess the construction of the DPDP without consideration of its intended purpose – to exploit climate wrecking fossil fuels in the very last decade we have for meaningful climate action – then this would be akin to a Doctor carefully assessing and checking a broken finger, while the patient succumbs to terminal cancer.

1. Greenhouse gas emissions will rise

The DPDP will facilitate more gas, a significant source of greenhouse gas (GHG) emissions. Santos claims that gas is 'cleaner than coal' when burned but this is not the whole story. Methane is a more portent GHG, rapidly warming the atmosphere faster than CO₂, and there are significant fugitive emissions along the entire chain of production. Furthermore, the offshore Barossa gas field in the Timor Sea, north of the Tiwi Islands, has the highest carbon dioxide (CO₂) content of any gas field.

Santos has not addressed how they will monitor for fugitive emissions along the pipeline and at each state of processing the gas from beneath the sea floor to the ships to the harbour. In the DPDP this chain of production is well over 100km long through sensitive marine environments and Endangered marine mammal and turtle breeding grounds. Santos' referral report has no information to reassure us of these huge climate risks due to fugitive methane emissions and massive amounts of CO₂ produced once the pipeline is in use.

We ask what is the point of only assessing the impacts of the construction of the pipeline, without consideration of the devastating impacts of its intended use?

2. The NT may become unliveable

The NT is already too hot for many people to live in and is a key reason why the population remains transient. Under a midrange global emission scenario Darwin is predicted to have an average of 43 days a year above 35 degrees by 2030 (as a point of reference, in 2015 there were 11 days above 35 degrees). And by 2090 – within the lifetime of our children – Darwin is predicted to have an average of 111 days above 35 degrees under a midrange scenario and 265 days a year above 35 degrees under a high emissions scenario. Or as a 2020 CSIRO report for the NT government predicts, "By mid-century (2050), warming will range from 0.7 to 1.6°C under a low emissions pathway to 1.4 to 2.4°C under high emissions. At the end of the century (2090) warming will range from 0.6 to 1.8°C under low emissions to 2.8 to 5.1°C under a high emissions pathway."

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If we do nothing to reduce emissions, and instead continue to support the fossil fuel industry, including approving infrastructure such as this pipeline, we are looking at a possible five degree increase in temperatures. This is a shocking projection and a shocking burden to place on our children. Every government agenda and policy and all NTEPA assessments should be designed with that prediction firmly in mind, as this is an existential crisis for Territorians where the heat is already unbearably oppressive for much of the year.

3. Minimal long-term jobs

The Federal and NT Governments like to tout that more gas and more gas wells and pipelines will create an abundance of jobs. This is a persistent narrative. However, in reality the increase in jobs is relatively small and short-term, and not always locally sort. The Australia Institute has looked at best value-for-money when it comes to investment of public money into certain industries in order to create jobs. They found for every million dollars spent the gas industry employs approximately 0.4 people compared to health or education where for every million dollars more than 10 people are employed. Overall, the gas industry only employs 0.2% of the national workforce. By comparison the arts and recreation sector employ 1.9% of the total workforce and it is a gender-balanced sector, while the gas industry is heavily male-dominated.

Santos's statement pertaining to jobs (social impact) is: *"The Project will positively contribute to the Northern Territory economy during construction and ongoing operations phases, without causing significant environmental or social impacts"* (Table 11 page 185 of the referral report). This provides no information whatsoever. How many jobs? For how long? In terms of the social impact assessment criteria Australian Parents for Climate Action Darwin and NT do not find any supporting evidence in the referral documents that demonstrate social advantages such as additional, long term job security for Territorians.

Darwin residents are well acquainted with the boom/bust cycles of the gas industry, as in the case of the Inpex project. Then, there was a sudden increase in jobs during a construction phase which then swiftly dried up. This leaves families without job security and has flow-on effects throughout the community and local economy. When construction of Inpex was completed, house prices plummeted, people left the NT in droves, the Darwin CBD was left virtually deserted and many small businesses had to close up. In 2022, the next bust will be permanent as the entire world moves away from fossil fuels – including gas.

Why would the Northern Territory tie itself to this rotten legacy, which would forego genuine ecological sustainable development opportunities, such as solar energy, sustainable agriculture, ecotourism, education and biodiversity conservation-based land management?

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4. Gas is a bad investment and risks becoming a stranded asset – future carbon capture and storage does not justify the DPDP

The rest of the world is fast moving away from gas towards renewables making it a volatile investment and this pipeline is at high risk of becoming a stranded asset. In May last year the traditionally conservative International Energy Agency (IEA) released a report stating that there should be no new coal, oil or gas projects if the global energy sector is to reach zero net emission by 2050.

Australian Parents for Climate Action Darwin and NT request that the NTEPA assess the DPDP proposal with consideration of the pipeline being at serious risk of becoming a stranded asset in the near future.

Should the risk to marine wildlife, benthic ecosystems, mangroves and breeding grounds for endangered marine turtles and marine mammals be put at risk for such a short-term climate wrecking project? Environmental groups, Territorians, and importantly traditional owners in the region are broadly concerned about this pipeline project and will not accept these risks.

On page 184 of the referral report Santos asserts:

“The Project presents an opportunity to achieve emissions reduction targets consistent with the NT EPA objective. Specifically, the development of the Project preserves the Bayu-Undan to Darwin pipeline for life extension and/or repurposing opportunities. The current repurposing opportunity being investigated is the transfer of carbon dioxide from DLNG to Bayu Undan reservoir for Carbon Capture and Storage (CCS). Re-purposing of the Bayu-Undan facilities represents one of a portfolio of options being explored by Santos to achieve our net zero emissions by 2040 target. In addition, the contribution of gas to DLNG as part of the Project will be within the existing capacity licence of DLNG and the Project will therefore not be increasing the production of gas or GHG emissions over what is already approved for the DLNG facility.”

Australian Parents for Climate Action Darwin and NT have major concerns with this proclamation. In order to properly assess the DPDP the NTEPA will need to request significantly more detail from Santos. There is approximately 18% CO₂ in the Barossa reservoir, which is incredibly carbon-intensive LNG. It has been deemed the worlds dirtiest in fact, which is incompatible with the NTGs own emissions reduction targets. Santos claim they can undertake carbon capture and storage of the Barossa CO₂ emissions back into the Bayu-Undan facility. If the DPDP is to be used for this untested and unproven at scale proposal, the community will need to see detailed modelling of how the CCSU component of the project would work. Australian Parents for Climate Action Darwin and NT request that the NTEPA transparently show their detailed assessments including cost/benefit analysis and modelling of the many risks associated with sequestering such immense amounts of CO₂

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permanently under the sea floor, after being transported over 100km through pipeline to an ageing facility; and, what impacts would occur should the inherent climate risks come to bear.

Santos has provided only the bare minimum of basic information pertaining to these high-risk plans in the referral report. The community would be horrified to know that such complex, high risk, high stakes CCSU proposals are not being thoroughly investigated by the NTEPA as part of this submission. We understand that the NTEPA is only assessing the pipeline within Northern Territory waters, and a separate authority is assessing Santos' plans outside of Territory waters. This piecemeal approach across different jurisdictions will not provide an accurate overall picture of the entire project and the likely impacts at every stage. The entire project must be assessed as a whole for all risks to be adequately assessed.

Furthermore, CCSU is not a justification for pursuing more dirty fossil fuels. Carbon capture and storage will lock us into decades more of fossil fuels and is not feasible at any scale close to what will be required to sequester the emissions generated from the project, let alone reduce current emissions.

5. Poor consultation with Traditional Owners

We understand that Tiwi Islander Traditional Owners are seriously concerned about the DPDP and do not believe that Santos has consulted adequately with them about this proposal. The new pipeline will be laid within 6km of the Tiwi Islands, right through important feeding and breeding grounds for marine sea turtles, which are culturally significant species.

Australian Parents for Climate Action Darwin and NT point the NTEPA to the Tiwi Islander locals publicly voicing their concerns about this project: <https://www.youtube.com/watch?v=p63M3T9BVv0>

These concerns have also been reported by the SBS: <https://www.sbs.com.au/news/why-these-tiwi-islanders-are-worried-about-one-of-australia-s-newest-gas-projects/66e605aa-6a33-48b8-9e81-b98e6664de28>

The NTEPA must travel to the Tiwi Islands to discuss Santos' DPDP in person to engage respectfully with them on this issue. Rather than accept Santos' claims of appropriate engagement, the NTEPA must ask the Traditional Owners themselves.

The Larrakia People are the Traditional Owners of the Darwin Harbour and must also be genuinely consulted in this way. This will be the third pipeline laid in Darwin Harbour, which has significant biocultural values for Larrakia, and previous consultation with Larrakia Traditional Owners does not "cover off" on new developments.

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6. Habitat destruction

Santos has demonstrated mangrove monitoring including permanent photo point monitoring in their referral documents. While the small number of individual mangrove trees look to be healthy at the site in Darwin Harbour, we draw the NTEPAs attention to the massive mangrove die off that has impacted hundreds of kilometres of mangrove forests along the Gulf of Carpentaria and elsewhere in the Top End in recent years. These priceless mangrove ecosystems – vital breeding grounds for innumerable fish, prawn and crab species -- ensure the health of our estuaries and are the basis for the Top End's productive fishing industry.

The mangrove die-off experienced in recent years is directly attributable to climate change. Although Santos' construction footprint for the DPDP is >100km of pipeline from the Darwin Harbour through Tiwi Islander waters to the Barossa reservoir, the impacts on First Nations peoples of the Northern Territory is far reaching. The majority of the coastline of the Northern Territory is now owned and cared for by Aboriginal people. Mangrove forests are of immense cultural and ecological value.

The NTEPA must consider how the DPDP will impact the Territory's precious mangrove forest ecosystems, and how the project will have far reaching impacts on these important cultural resources, well beyond the site of their photo monitoring points.

Santos asserts that the DPDP will be 'smaller' than other pipelines already in use in the harbour. But the fact is this will be the third major pipeline construction. The cumulative impacts of increasing infrastructure in this already highly developed area cannot be dismissed. Just because old data from previous Inpex surveys found that some animals returned after construction work, does not mean that they will come back or not be impacted after a third pipeline is laid with all the associated dredging, noise, pollution and heightened activity. The NTEPA must assess the cumulative impacts of additional construction and infrastructure in the harbour and the synergistic effects this will have on natural systems and biota.

We reject that the pipeline construction will have no negative effects on Critically Endangered Olive Ridley turtles, other species of sea turtles and marine mammals. Santos relies on old data from Inpex to assert that all these species of conservation significance will not be impacted. Up to date research and surveys must be undertaken by an independent expert in order to determine what the anticipated impacts will be on the animals themselves and their critical habitat areas.

In conclusion

It is obvious this DPDP is simply Santos delaying the expensive decommissioning of the Bayu-Udan facility. As part of the impact assessment

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the NTEPA has a responsibility to all people of the Territory to ensure genuine ecological sustainable development (ESD), as per the Environmental Protection Act 2019. This project does not satisfy any of the principles of ESD and in fact will be incredibly damaging socially, environmentally and culturally should the proposal go ahead.

Climate change is a genuine threat to the health and safety of our children and induces real anxiety among many parents. For the reasons highlighted above, Australian Parents for Climate Action Darwin and NT cannot accept the NTEPA assessing the DPDP proposal by Santos in isolation, and urgently request that the entire project is thoroughly scrutinised, including total greenhouse gas emissions, before any components are approved.

As concerned community members and carers of the next generation of Territorians, we sincerely request the NTEPA to take this assessment through the highest possible scrutiny.

Specifically, we wish to see the NTEPA:

- (a) call in a referral under s53(1) of the Environment Protection Act of the broader Barossa Project as a whole;**
- (b) if, the NTEPA does not call in the proposal, the Darwin Pipeline Duplication Project and the broader Barossa Project must be assessed at the highest level – a public inquiry.**

Yours sincerely,

On behalf of
Australian Parents for Climate Action, Darwin and NT

