Heather Ferguson

GPO Box 1252

Darwin NT 0801

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NT EPA

Ichthys Consultation

Dear Sir/Madam,

Re: Ichthys Carbon Capture and Storage Submission

Thank you for the opportunity to submit to this proposal regarding Carbon Capture and Storage (CCS).

I have lived in the Territory for over 14 years and grown to love our wildlife, our lifestyle and the iconic geography of the NT. Unfortunately, I am seeing and experiencing detrimental changes that are impacting on our environment, our wildlife and our health.

Darwin has become noticeably hotter. In 2019, over 43 days were over 35°C and future projections predict that Darwin will be virtually unliveable for part of each year (Northern Territory Government). Heat impacts include increased death rates, heat-related hospital admissions, exacerbation of mental health conditions, violence and suicide (Northern Territory Government).

Burning of fossil fuels, is a major contributor to the rising CO_2 levels in our atmosphere that are driving temperature change. Mining, production and processing of gas results in massive CO_2 emissions, however CCS is not the most effective solution to reducing these. Only Scope 1 emissions can be impacted by CCS but Scope 2 and Scope 3 emissions are by far the major source of CO_2.

CCS is proven to be a costly, unreliable, inefficient and marginally effective technology that can deal ONLY with the lesser percentage of Carbon Dioxide (CO_2) that is released from the gas field or Scope 1 emissions (Morrison, 2024). Chevron's Gorgon CCS project is the largest in the world. It has continued to fail to meet target sequestration despite Millions in government tax payer funded subsidies and Billions of investment expense (Mercer, 2024).

The referral is silent on this actual effectiveness of CCS and its contribution to a low carbon society globally, which is likely to be insignificant. Hence the rationale for the project is largely irrelevant and the project should not proceed at all.

A far more effective and impactful solution to carbon reduction, is to not mine the gas in the first place, reduce reliance on fossil fuels and accelerate investment in renewable energy sources, such as wind and solar.

Darwin Harbour quality

Dredging, clearing of erosion protecting mangroves, disturbance of acid soils and toxins, water quality and turbidity and other impacts on the harbour are all discussed in the Ichthys referral

report. Around 100 pages of the referral are devoted to detailing the flora and fauna of the area to be dredged and pipeline laid. The proposal states that nine of the fourteen environmental issues identified by the NT EPA have the potential to be significantly impacted (Table ES-1). Remarkably, self- assessment by the referrer indicates that NONE of these represent any risk or significance. In a referral of this importance, this assessment must be done by independent expert investigators to ensure the greatest rigour. It is possible that the proponent's view of what is significant is quite different from what the community thinks is significant. The risk assessment should be done by independent experts.

Endangered species

Migratory birds will be impacted significantly by loss of habitat. The project footprint runs directly through a site of national significance for the critically endangered Far Eastern Curlew. These birds rest and feed after migrating thousands of kilometres and clearing of habitat will reduce their capacity to recover for their return journey, resulting in loss of breeding capacity. Protecting habitat for these birds is critical. The risk is high and significant, quite unlike what is considered by the referrer.

Marine and terrestrial species will be impacted by loss of habitat due to land clearing, soil disturbance and acidification, weed infestation and risk of pipe rupture releasing toxins. These do not appear to be addressed other than that a plan will be developed to minimise disturbance. Any plans developed by the proponent must have identifiable, measurable targets and frequent public reporting for the community to have confidence that "minimisation" meets community requirements.

Toxic Gas Leakage

The risk of toxic gas leakage is high, with toxic leaks already having been experienced at this site. Release into the atmosphere of toxins, including Benzene a known carcinogen and Volatile Organic Compounds has been underreported for some years. These toxins can exacerbate respiratory illness and asthma, particularly in children. This site is close to Palmerston, a growing population centre. Again, the risk of harm is real, high and significant.

Alternatives

A far more effective and less costly solution to both our energy needs and impact on the environment, is rapid investment in renewable wind and solar energy. These, unlike gas, do not result in massive emissions, nor toxic by-products. Australia does not have a shortage of gas; it has a policy problem regarding supply and preservation of gas for citizens.

In summary, this process is not effective, it only addresses Scope 1 emissions from gas production, it will itself be energy costly, it will cost Billions (subsidised) to create over many years and ultimately will be too little too late to have any impact on our climate. The project should not go ahead.

Yours Sincerely,

Heather Ferguson

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