SUBMISSION ON DRAFT TERMS OF REFERENCE – ICHTHYS LNG AGRU UPGRADES AND CCS PREPAREDNESS PROJECT

15 June 2026

About Beyond Gas Network

Beyond Gas Network is a national network of community organisations, climate groups and concerned citizens advocating for a rapid and equitable transition away from fossil gas and towards renewable energy. The Network supports climate action, protection of nature, respect for First Nations rights and a just transition.

1. Introduction

The AGRU Upgrades and CCS Preparedness Project should not be assessed as a routine plant modification. The proposal forms part of a broader strategy intended to support carbon capture and storage and the continued operation of LNG infrastructure. The EIS should assess the project's strategic role in enabling future CCS operations and associated fossil fuel production.

2. Climate Change and LNG Expansion

The EIS should assess direct, indirect and lifecycle greenhouse gas emissions associated with the project and linked LNG operations. The assessment should consider whether the proposal facilitates continued LNG production and expansion and whether this outcome is consistent with Australia's climate commitments, the Paris Agreement and the Global Methane Pledge.

3. AGRU Upgrades as Enabling Infrastructure

The project appears designed to prepare the Darwin LNG facility for future CCS operations. The EIS should explicitly assess the implications of enabling future CCS-dependent LNG production and whether approval of the upgrades creates expectations for future fossil fuel development. The environmental consequences of the infrastructure enabled by the upgrades should be considered.

4. Dependence on Ichthys CCS and Bonaparte CCS

The AGRU Upgrades Project is closely linked to both the Ichthys CCS Project and the Bonaparte CCS Project. The EIS should assess risks arising if those projects are delayed, underperform or fail to proceed. Assessment should include contingency arrangements, stranded infrastructure risks and cumulative impacts.

5. Greenhouse Gas Consequences and Additionality

The EIS should demonstrate that claimed emissions reductions are genuine, measurable and additional. It should examine capture assumptions, storage assumptions, leakage scenarios and verification arrangements. The assessment should explain how claimed climate benefits remain credible if CCS performance differs from projections.

6. CCS Performance and the Gorgon Experience

The EIS should evaluate lessons from Australian and international CCS projects, including the Gorgon Carbon Dioxide Injection Project. Publicly reported delays and performance issues demonstrate the need for caution when relying on projected capture and storage outcomes. Independent expert review should be required.

7. Alternatives Assessment

The EIS should rigorously assess alternatives including direct emissions reduction measures, electrification, renewable energy substitution, energy efficiency improvements and reduced production scenarios. Alternatives should not be dismissed solely because they reduce LNG output.

8. Cumulative Impacts and Climate Lock-In

The AGRU Upgrades Project, Ichthys CCS Project, Bonaparte CCS Project and associated LNG developments should be assessed cumulatively. The EIS should examine whether the availability of CCS-ready infrastructure contributes to climate lock-in by facilitating continued fossil fuel production that may otherwise decline.

9. First Nations Rights, Sea Country and Cultural Heritage

The EIS should contain a comprehensive assessment of impacts on First Nations peoples, Country and Sea Country. Traditional Owners should have meaningful opportunities to influence project design, mitigation measures, monitoring arrangements and assessment methodologies.

10. UNDRIP and Native Title Reform

The assessment should be informed by the principles of the United Nations Declaration on the Rights of Indigenous Peoples, including participation in decision-making and protection

of lands and waters. The EIS should also recognise the relevance of ongoing discussion regarding reform of the Native Title Act future acts regime.

11. Consistency with Emerging National Environmental Standards

The proposal should be assessed against principles underpinning emerging National Environmental Standards, including precaution, transparency, cumulative impact assessment, climate risk assessment and First Nations participation.

12. Recommendations

Require cumulative assessment of linked projects; independent review of CCS assumptions; assessment of climate lock-in risks; robust alternatives assessment; comprehensive First Nations engagement; transparent greenhouse accounting; and application of the precautionary principle.

13. Conclusion

The AGRU Upgrades and CCS Preparedness Project should be assessed as enabling infrastructure for CCS and continued LNG production rather than as a minor modification. The burden should remain on the proponent to demonstrate genuine environmental benefit and consistency with climate, biodiversity and First Nations objectives. Where uncertainty exists, the precautionary principle should apply.