SUBMISSION ON DRAFT TERMS OF REFERENCE – ICHTHYS CARBON CAPTURE AND STORAGE 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.

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1. Introduction

The Ichthys CCS Project should not be assessed as a stand-alone emissions reduction proposal. It forms part of a broader suite of projects associated with continued LNG production and export. The EIS should therefore assess not only direct project impacts but also the role of the project in supporting continued fossil fuel production.

2. Climate Change and Continued Fossil Fuel Production

The EIS should assess direct, indirect and lifecycle greenhouse gas emissions, including downstream emissions from exported LNG. It should evaluate whether the project contributes to extending the operating life of LNG infrastructure and whether it is consistent with Australia's climate commitments, the Paris Agreement and the Global Methane Pledge.

3. Reliance on CCS versus Direct Emissions Reduction

The EIS should assess whether CCS is being used as a substitute for direct emissions reduction measures. Alternatives such as electrification, renewable energy substitution, energy efficiency and reduced production scenarios should be rigorously evaluated.

4. Dependence on Bonaparte CCS

The Ichthys CCS Project appears operationally dependent on the Bonaparte CCS Project. The EIS should assess risks associated with delay, underperformance or non-delivery of Bonaparte and evaluate contingency arrangements and cumulative impacts.

5. Carbon Capture Performance and the Gorgon Experience

The EIS should not assume projected capture rates will be achieved. Lessons from Australian and international CCS projects, including the Gorgon Carbon Dioxide Injection Project, should be assessed. Independent expert review should be required for performance modelling and storage assumptions.

6. Greenhouse Gas Accounting and Additionality

The EIS should demonstrate that claimed emissions reductions are genuine, measurable and additional. Leakage, incomplete capture, verification arrangements and long-term integrity of claimed emissions reductions should be assessed.

7. Cumulative Impacts and Climate Lock-In

The Ichthys CCS Project, Bonaparte CCS Project, AGRU Upgrades Project and associated LNG developments should be assessed cumulatively. The EIS should examine whether the availability of CCS infrastructure facilitates continued fossil fuel expansion and contributes to climate lock-in.

8. First Nations Rights, Sea Country and Cultural Heritage

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

9. UNDRIP and Native Title Reform

The assessment should be informed by 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 discussions regarding reform of the Native Title Act future acts regime.

10. Alternatives Assessment

The EIS should assess direct emissions reduction options, renewable energy alternatives, reduced production pathways and options that avoid the need for CCS. Alternatives should not be dismissed solely because they may reduce LNG output.

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 performance assumptions; assessment of climate lock-in; robust alternatives assessment; comprehensive First Nations engagement; and application of the precautionary principle.

13. Conclusion

The burden should remain on the proponent to demonstrate that the project will deliver genuine and enduring emissions reductions without creating unacceptable environmental, cultural, climate or intergenerational risks. Where uncertainty exists, the precautionary principle should apply.