



2nd May 2024

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

By email: ec.sen@aph.gov.au

Dear Committee

Western Queensland Alliance of Councils – Submission to Inquiry into Glencore’s proposed carbon capture and storage project

Background:

The Western Queensland Alliance of Councils (WQAC) welcomes the Committee’s Inquiry into Glencore’s proposed carbon capture and storage project and is grateful of the opportunity to make a submission.

By way of introduction, the [WQAC](#) is a collaboration between the three regional organisations of councils in Western Queensland – the North West Queensland Regional Organisation of Councils ([NWQROC](#)), the Central West Remote Area Planning and Development Board ([RAPAD](#)), and the South West Queensland Regional Organisation of Councils ([SWQROC](#)).

Our three bodies represent 24 Councils that stretch from the Gulf of Carpentaria in the far north to the New South Wales/South Australian borders in the south. This area covers 60 percent of Queensland and represents some of the most remote, but also productive communities in Australia.

WQAC provides a united voice for issues facing communities, economies and industries in Western Queensland, and in this instance, together, we represent communities deeply reliant on the benefits of a healthy Great Artesian Basin (GAB).

WQAC communities are unanimous in our opposition to the Glencore-owned carbon capture and storage (CCS) project and in our concern regarding the detrimental and irreversible effects that polluting groundwater will have on the communities and economies of Western Queensland.

It is for this shared concern that we strongly oppose Glencore’s CCS project, as proposed by its subsidiary Carbon Transport and Storage Corporation (CTSCo).

This submission will outline, in accordance with the Inquiry’s terms of reference, the reasons for WQAC’s opposition.



WQAC Positions:

1. Decision not to classify the project as a controlled action under national environment law

The decision not to classify the project as a “controlled action” under the Commonwealth’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is incomprehensible.

It is our view that, the CTSCo proposal should be considered a “controlled action” under the EPBC Act, as national law providing for environmental assessment and approval of actions impacting matters of national environmental significance.

While CCS is not expressly mentioned in the EPBC Act, the negative potential impacts on groundwater in sections specifying “*unconventional gas development*” and “*large coal mining development*” are not dissimilar to the potential impacts by CCS.

Indeed, a “*water trigger*” applies under Section 24 of the EPBC Act for proposed unconventional gas or large coal mining developments that has, will have, or is likely to have a significant impact on water resources to refer the proposal to the Minister for the Environment for assessment and approval under the Act.

It is for these reasons the previous Minister for Environment, the Hon Sussan Ley MP should have used her powers to assess this proposal under the EPBC Act; and whether the current Minister for the Environment and Water, the Hon Tanya Plibersek MP can use powers under Section 78 of the EPBC to reconsider a decision.

The 2019 *Great Artesian Basin Strategic Management Plan*, prepared by the Australian, New South Wales, Queensland, South Australian and Northern Territory governments in consultation with the Great Artesian Basin Coordinating Committee, identified the “*injection of gases*” as an emerging challenge for the Basin.

To avoid future confusion, the EPBC Act should be amended to include CCS projects and others proposing the injection of gases in the definition of “*water trigger*”, just as it was amended in December 2023 to apply to all types of unconventional gas, including shale and tight gas related developments.

2. Potential risks and impacts on groundwater quality within the Great Artesian Basin

Any review of literature will highlight the significance of the GAB. It is one of the largest underground freshwater resources in the world and covers approximately one-fifth of the Australian continent.

Today, it is vital in supporting municipal, agricultural and industrial water supply in the interior of the continent. Furthermore, it has supported the inhabitation of the driest parts of the Australian continent by Aboriginal people for approximately 60,000 years.

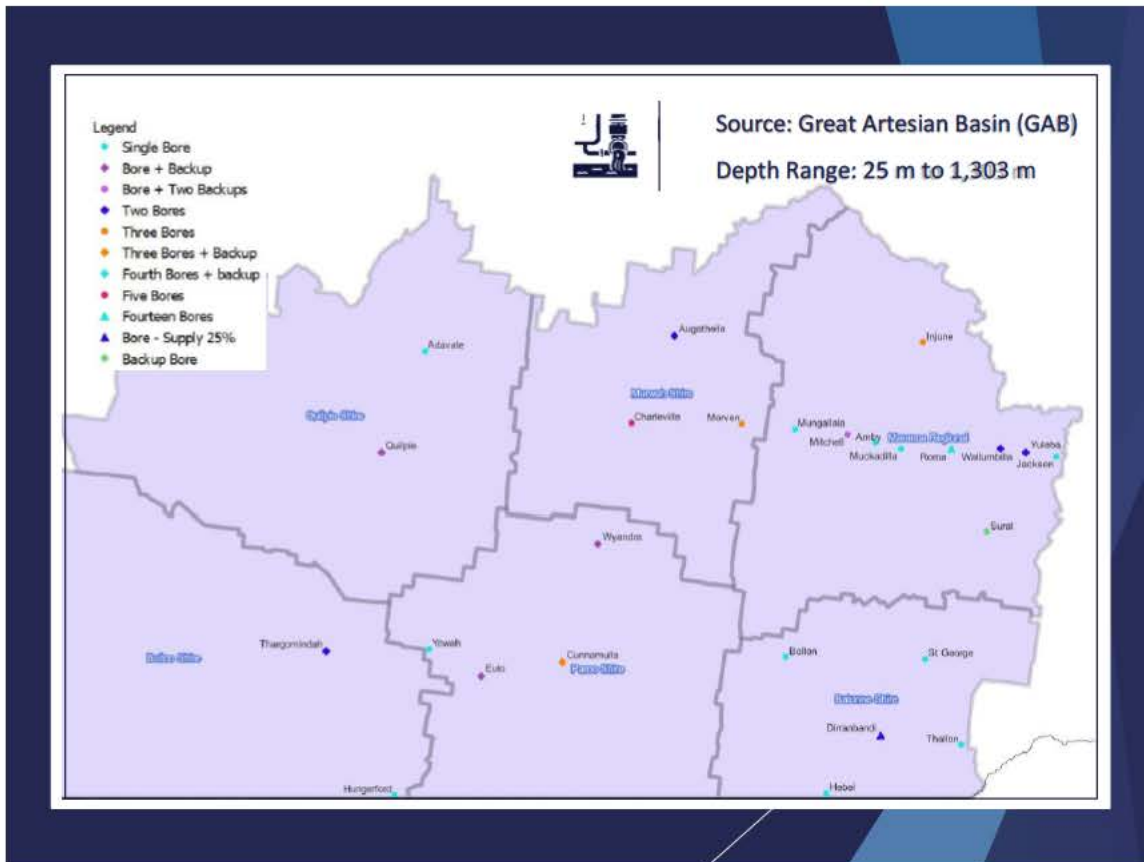
As the Department of Climate Change, Energy, the Environment and Water recognises:

“The Basin generates approximately \$13 billion per year. It is a vital resource for 180,000 people, 7,600 businesses and 120 towns”.

As noted above, the GAB is a vital resource for town water supplies, and in many instances is the ONLY form of potable water supply across communities. Figure 1 below illustrates this point for South West Queensland where all communities are reliant on bores that source water from the GAB. In this region there is no contingency through river sources or surface water such as dams – the GAB literally is the lifeblood of these communities.



Figure 1: Overview of GAB bores across South West Queensland communities as the single source of potable water



Chapter 9 of CTSCo’s Environmental Impact Statement (EIS) contains the risk assessment for groundwater near the proposed site of the CCS project. At a number of the studied locations, there is a notable increase in both the lead and arsenic concentrations near the location of the greenhouse gas plume over both the short and long-term.

Any error or fault in construction may have the potential to increase the concentration of lead and arsenic in groundwater resources, thus negatively impacting the health of residents reliant on groundwater. The detrimental impact on agricultural industries should this occur would be disastrous for producers and local economies more broadly.

Furthermore, CTSCo’s own report (Executive Summary, Chapter 8 and Chapter 9) states that the impact of CCS will reduce pH levels in groundwater from 8.4 (alkaline) to 4 (acidic). The effects on municipal and agricultural water supply from acidification would be detrimental to communities and economies in Western Queensland.

Similarly, the peak body for the agricultural industry in Australia, the National Farmers’ Federation (NFF) has expressed strong concerns about CTSCo’s CSS proposal and the impact it would have on agricultural water supply from the GAB. In a media release on 29 November 2023, NFF President David Jochinke said:



“By injecting coal mine waste into this vital water source, it puts food production at serious risk. Once you pollute the Basin with toxic waste from a coal mine, there’s no going back from that... This is in a region renowned for producing safe, high-quality beef. We simply cannot risk the health of the Basin or the health of this important source of farming water. The Queensland Government needs to listen to the experts and say no to injecting coal mine waste into the Great Artesian Basin.”

Elsewhere in the NFF’s media release, they state:

“...a hydrologist had advised the corrosive nature of the carbon dioxide fluid injected into the Precipice aquifer would cause a 10,000-fold increase in groundwater acidity, dissolve the aquifer rock and cause the leaching of heavy metals, including lead and arsenic.”

It is for these reasons that the protection of the GAB’s health is paramount. Ingress into groundwater of foreign substances is a significant risk presented by CCS, and as such, may impact the health of residents in communities reliant on groundwater in both the short and longer term.

3. Potential socioeconomic impacts on agriculture and regional communities

Despite its small population base, Western Queensland contributes significantly to state and national economic and employment outcomes, delivering \$16.27 billion in gross regional product. The region is a major primary industry hub in Queensland producing an abundance of commodities and exports, with mining and agriculture representing almost 76 percent of economic activity and around 1 in 3 jobs across the region. Access to the GAB is a major contributor to this level of economic activity and productivity as noted earlier in this submission.

The leaders of Western Queensland towns, with intimate knowledge of their local communities and regional economies, rightly voice their concerns about the potential adverse impacts of CCS on the GAB.

The new Mayor of the Western Downs Regional Council, Cr Andrew Smith, representing the local government area where the CTSCo project is proposed – an area that boasts significant cropping, cattle, and energy industries, said:

“In [Western Downs Region], which is where the trial is happening, we have 40 per cent of cattle in Australia on lot feed in our region. It’s important to us; it’s important to our economy, and we don’t want to risk the Great Artesian Basin”.

The Leadership Group within WQAC have also added to the concert of concerns with Longreach Region Mayor, Tony Rayner, Chair of the CWQ Remote Area Planning and Development Board stating:

“It is beyond belief that something like this would be considered - gambling with the lifeblood of Queensland’s regional and remote communities, industry and economy and beyond”.

Balonne Shire Mayor, Samantha O’Toole, Chair of the South West Queensland Regional Organisation of Councils said:

“The councils of the west are acutely aware of the international, Australian and State-based initiatives to achieve net zero targets by 2050, as well the trials and feasibility studies underway, and are actively engaged in Queensland’s Energy and Jobs Plan. We also acknowledge that this kind of process is emerging globally as a potential tool to lower emissions. However, amongst various red flags most notable is from QFF research that indicates the application of this process within a usable water resource is unprecedented. The GAB is simply too precious to act as a test case in these untested circumstances”.



Carpentaria Shire Mayor, Jack Bawden, Chair of the North West Queensland Regional Organisation of Councils said:

“The injection of industrial waste into a usable water resource such as the GAB is extremely alarming and should be for all Australians given its significance to vast areas of country, its communities, its food supply and economy. To do so would at least be irresponsible and perhaps even fool hardy. Such an action is not worth the risk with one of Queensland and Australia’s most significant natural and economic assets no less important than the Great Barrier Reef”.

There are significant and widespread concerns about damaging critical water resources by allowing a CCS trial in the GAB. Noting these concerns by all sectors of the community as well as key industry sectors across all GAB regions, it is incumbent on Governments (both Commonwealth and State) to increase scrutiny of CTSCo’s CCS proposal, by, at a minimum, requiring such proposals to be subject to the requirements of the EPBC Act.

4. The consultation process

WQAC acknowledges that there has been community consultation about this proposal through two key mechanisms. First, the release (Public Notice) of the Environmental Impact Statement (EIS) through the Queensland Department of Environment and Science and second, dedicated community consultation sessions carried out by CTSCo.

With respect to the EIS, it has been well documented in Queensland that one of the lessons learnt from the rapid expansion of the resources sector including CSG was that the community’s ability to comprehend and respond to the EIS process was limited. In this instance, given the scientific nature of CTSCo’s proposal, it was extremely difficult for community members and / or individual councils to be able to respond adequately to the issues identified in the EIS.

With respect to the CTSCo engagement process it is acknowledged that the organisation provided stakeholders with a range of information and conducted several consultation forums across various regions.

However, WQAC would point to the nature of the information offered and question whether CTSCo provided unbiased information, especially in light of the contested science being circulated across community and industry sectors.

Whilst ‘greenwashing’ is no doubt too strong a description, feedback from community members points to information from CTSCo focussing on the merits and safety of the proposed project.

In this regard, WQAC believes the consultation process was bound to be inadequate from the start. Environmental Impact Statements are not community friendly documents. Coupled with competing scientific claims around the information provided by CTSCo, it has been difficult for communities to feel properly informed and engaged leading to mistrust and ambiguity.

5. Potential precedent

WQAC has significant concerns that should the current process for approving CCS projects continue unamended and unabated, communities located in the GAB will be damaged irrevocably, as will the rural and agricultural industries that support them.



According to Glencore's website, there is an implied desire for CTSCo's current proposal to be the first step on the way to a large-scale CCS industry – possibly using the GAB as its long term host:

"The project is intended as a first step toward large-scale CCS, with the potential for emissions from multiple other industrial sources being captured and safely stored. A deep sandstone formation within the Surat Basin provides the right conditions for long-term geological storage of large volumes of CO₂".

This is a precedent that must not be allowed.

At a State level, CCS is termed as "GHG storage" in the Queensland *Environmental Protection Act 1994* (EPA Act) and is a "prescribed environmentally relevant activity" that requires an environmental authority from the Department of Environment, Science and Innovation (DESI).

It is difficult to accept that State legislation specifically mentions GHG storage as an environmentally relevant activity, but despite a statutory review of the EPBC Act, no such inclusion was made for CCS as a controlled action.

As a comparative example, it is important to identify the significant number of projects that have been designated as controlled actions and subsequently rejected, such as Central Queensland Coal Pty Ltd's proposed coal mine and gas project northwest of Rockhampton. The uncertain impacts to water resources and the Great Barrier Reef were key reasons that the Hon Tanya Plibersek MP, Minister for the Environment and Water rejected that particular proposal.

Federally, the EPBC Act needs to be amended to ensure that CCS projects are covered as a controlled action.

6. The role of CCS in Australia's climate change mitigation strategy

According to CTSCo literature, *"The International Energy Agency (IEA) and the UN Intergovernmental Panel on Climate Change (IPCC) both regard CCS as essential if the world is to achieve its emission reduction goals. The Australian Climate Change Authority also supports CCS, and this year stated that governments should pursue policies that "scale-up engineered and geological sequestration, both onshore, and offshore".*

Yet, WQAC is also aware of literature that states:

"Carbon capture and storage (CCS) is an expensive and unproven technology that distracts from global [decarbonisation] efforts while allowing the oil and gas industry to conduct business as usual. Even if [realised] at its full announced potential, CCS will only account for about 2.4% of the world's carbon mitigation by 2030, according to the Intergovernmental Panel on Climate Change (IPCC). It's worth noting that not one single CCS project has ever reached its target CO₂ capture rate" (The Institute for Energy Economics and Financial Analysis).

The above illustrates the complexity of communities fully understanding the issues and what source of information to trust and rely on.

What WQAC does want to emphasise, is that many communities in Western Queensland are already undertaking a number of small-scale renewable energy projects, in conjunction with larger private investment, or are adopting energy efficiency measures as a means to reduce carbon emissions. It is already clear, that Western Queensland understands it needs to contribute to State and Federal emission reduction targets.



What is even clearer though, and as evidenced in the widespread public opposition to the CTSCo project, is that Western Queensland communities are not prepared to tolerate or risk damaging the GAB as a pathway to achieving net zero emissions by 2050.

Concluding Comments

As emphasised throughout this submission, the water resources within the GAB are critical to the social, economic and environmental sustainability of Western Queensland and no doubt other inter-state regions that are likewise served by the GAB.

Further, our First Nations communities have a strong cultural connection to water and conservation values, through both water quality and quantity.

Putting at risk the health of the GAB through CCS will have enormous detrimental and long-term impacts on the economic, social, environmental and First Nations heritage of Western Queensland, all for very little gain (it seems) in helping reduce the impact of CO₂ emissions.

As a nationally significant water resource, successive Governments have rolled out policies, plans and programs coupled with significant funding to protect the sustainability of the GAB. As such, it appears counter intuitive that the Government is not employing the pre-cautionary principle with regard to the CTSCo proposal or at the very minimum subjecting CCS projects to the requirements of the EPBC Act.

In summary, WQAC strongly urges all levels of Government to do everything in their powers to stop CCS activities, whether it be the present CTSCo proposal or future proposals from occurring in the GAB.

We hope the issues outlined in WQAC's submission are of assistance to the Committee in formulating its recommendations and we look forward to the outcome of the Inquiry in due course. In the interim, the WQAC would appreciate the opportunity to meet with the Committee or host a meeting in Western Queensland noting the Committee has been granted an extension to its reporting timelines until 2nd July 2024.

Yours sincerely

NWQROC

RAPAD

SWQROC

Cr Jack Bawden
Mayor
Carpentaria Shire Council
Chair, NWQROC
Ph:

Cr Tony Rayner
Mayor
Longreach Regional Council
Chair, RAPAD
Ph:

Cr Samantha O'Toole
Mayor
Balonne Shire Council
Chair, SWQROC
Ph:

Greg Hoffman PSM
Executive Officer, NWQROC
Ph:

David Arnold
CEO, RAPAD
Ph:

Simone Talbot
Executive Officer, SWQROC
Ph: