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2 May 2024

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

Email: ec.sen@aph.gov.au

Dear Sir/Madam

Re: Senate Inquiry into Glencore's proposed Carbon Capture and Storage Project

AgForce Queensland Farmers Ltd (AgForce) is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$10.4 billion in on-farm value of production in 2021-22. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,500 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

AgForce thanks the Australian Senate for the opportunity to lodge a submission into the implications of Glencore's proposed carbon capture and storage (CCS) project by its subsidiary, Carbon Transport & Storage Corporation (CTSCo), in the Great Artesian Basin (GAB).

AgForce has launched legal action in the Federal Court seeking a judicial review of the 9 February 2022 decision to the *Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)* to waive through the Glencore/CTSCo project proposal. With a court appearance pending, AgForce is limited in what the organisation can say, but suffice to say, AgForce's members are concerned about irreversible damage that could result to one of the world's largest water resources, a resource that is relied upon by communities and industry across vast swathes of Australia.

Of note, AgForce is not opposed per se to the technology of carbon capture and storage albeit we are seeking to ensure any application is considered through the lens of the 'Precautionary Principle' applied more broadly to projects with potential environmental impacts. Rather, our primary concern in seeking judicial review of the 9 February 2022 decision and our broader action is protection of one of the natural wonders of the world.

SENATE INQUIRY TERMS OF REFERENCE

a) Environmental Impact Assessment Process

AgForce's current legal action seeks a judicial review of the 9 February 2022 decision that the CCS project was not captured by the Matters of National Environmental Significance (MNES) provisions of the EPBC Act and was therefore considered "Not a Controlled Action".

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This decision has raised serious concerns about the adequacy of the Federal government's assessment considerations regarding environmental matters, given technical reports such as an Environmental Impact Statement or Technical Water report were not considered as part of the initial assessment.

The Federal government's February 2022 assessment and decision was not well known to the general public and was rushed through in under four weeks and passed on to the Queensland government for final assessment.

The Queensland government's environmental impact assessment process (EIS) for the CCS project has also lacked transparency and thoroughness. For example, post submissions closing on the EIS process, Glencore was allowed to provide additional information into their application that the broader community had no visibility of, or ability to consider and reflect on to make further comment on.

b) Risks and Impacts to Ground Water Quality

The potential risks and impacts from the Glencore CCS project on groundwater quality in the GAB are significant, where hydrogeologist studies¹ have highlighted the potential for groundwater acidification and mobilisation of heavy metals such as lead and arsenic, thus posing significant threats to both the environment and human health.

The University of Queensland has also released a report highlighting the potential mobilisation of lead and arsenic in groundwater, their modelling showing that the injected CO₂ and associated 10-000-fold acidification could significantly elevate groundwater metal concentrations (including lead, arsenic and cadmium) to levels unsafe for human and animal consumption, for more than 100 years.

Robust assessments of these risks are essential, along with the implementation of effective mitigation measures to safeguard groundwater quality.

c) Scientific Basis of Safety Claims

The scientific basis and transparency of safety claims made by CTSCo must also be rigorously evaluated.

Critiques by independent hydrogeologists and aqueous geochemists raise doubts about the reliability of the data and analysis presented by CTSCo. Glencore has labelled the water at the project site as "saline" and "non-potable", implying that it may be unsuitable for livestock and human use. However, Glencore's own water testing has indicated that the salinity levels fall within safe limits for livestock use.

The contradiction raises concerns about the potential for Glencore to mislead stakeholders regarding the suitability of the water for agricultural purposes. It is essential to ensure that safety claims are based on sound scientific evidence and that all stakeholders have access to transparent and accurate information.

d) Socioeconomic Impacts

The CCS project could have significant socioeconomic impacts on agriculture and regional communities reliant on the Great Artesian Basin for water. Disruptions to water access and usage rights could affect agricultural productivity and rural livelihoods.

Our regional communities, families and industries rely on this water source. The potential for destruction of the water source that supports 180,000 people cannot be understated. Significant damage to a water source(s) may occur should the CO₂ plume move, shift, transform or create an eruption, potentially impacting many of our regional areas who have no other reliable source of water for their families and their livestock.

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¹ <https://www.abc.net.au/news/rural/2023-11-23/great-artesian-basin-carbon-capture-project-opposition/103080402>

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Comprehensive assessments of these impacts, including their implications for existing and future water use rights, are necessary to mitigate adverse effects on affected communities.

e) Consultation processes with Stakeholders

The consultation processes undertaken with stakeholders, including farmers, Indigenous landholders, environmental groups and the broader public, must be inclusive and responsive to concerns. There are indications that stakeholders' input has not been adequately considered in project planning and decision-making, highlighting the need for improvement in consultation processes.

AgForce members and our Land Use Protection Committee have had significant past interactions with Glencore in relation to their earlier Wandoan project, including ensuring good communication and exchange of views. That earlier project was discontinued, at least partly in response to community concerns about the use of an aquifer containing good quality water for that CCS initiative. Those experiences do not seem to have informed the current project proposal, which seeks to again access an aquifer containing usable water resources.

In relation to the current Project, only limited interaction by Glencore has occurred with our Land Use Protection Committee, who only have an advisory role to the AgForce Board. There has been no engagement with senior elected representatives at AgForce, at either a state-wide or regional level (our Southern Inland Queensland Council for example), nor with affected AgForce members close to the Project site.

In our view this does not represent best practice consultation processes.

f) Precedent Setting and Strategic Implications

CCS projects in the GAB could set a concerning precedent with far-reaching implications. The GAB is crucial for supporting ecosystems and rural communities and permitting industrial activities such as CCS could compromise the GAB's integrity. The Senate Committee should carefully consider the potential precedent set by this project and its implications for Australia's environmental and strategic interests.

If Glencore is successful in changing regulations, it will open avenues for anybody to take up sequestering technology and inject their carbon waste into the GAB.

The Australian and State/Territory governments are well aware that the GAB must be carefully managed to ensure water security for a large geographical area of Australia.

g) Role of CCS in Climate Change Mitigation

The role of CCS technology in Australia's climate change mitigation strategy requires careful evaluation. While it holds promise for reducing carbon emissions, its efficacy, risks and alternatives must be thoroughly assessed. Alternative approaches such as renewable energy development and energy efficiency measures may offer more sustainable solutions to mitigate climate change.

A report prepared by Investment Analyst, Bruce Robertson, for the Institute for Energy Economics and Financial Analysis², sheds light on the dismal performance of many CCS projects worldwide, where a majority have failed to meet expectations. The report states that out of 13 large-scale CCS projects examined, seven underperformed, two failed outright and one was mothballed.

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² The carbon capture crux: Lessons learned <https://ieefa.org/resources/carbon-capture-crux-lessons-learned>

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Conclusion

This submission has highlighted several critical concerns, including the inadequacy of the project's approval process, risks to groundwater quality, a lack of scientific transparency, concerning socioeconomic impacts, poor consultation processes, potentially negative precedent setting and the ineffective role of CCS in Australia's climate change mitigation strategy.

We urge the Committee to prioritise environmental protection, community interests, and sustainable solutions in its deliberations on this important issue.

The GAB is the world's largest underground potable water source. It covers 70% of the area of Queensland and is the life blood of many rural communities and the agricultural sector in Queensland. To contemplate compromising this vital water asset on the earth's driest habitable continent is unthinkable.

As a final comment, attached as an appendix to this submission is AgForce's February 2023 submission to the Queensland Department of Environment and Science on the *Environmental Impact Statement for the Surat Basin Carbon Capture and Storage Project*.

Should you wish to discuss this matter further, please do not hesitate to contact me on phone or via email

faithfully

Michael Guerin
Chief Executive Officer

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