



6 July 2023

To the Committee,

Submission to the Inquiry into the Environment Protection (Sea Dumping) Amendment (Using New Technologies to Fight Climate Change) Bill 2023 [Provisions]

Thank you for the opportunity to make this submission. 350.org Australia is a registered charity, and our charitable purpose is to inform and educate the general public about climate change, its impact on the natural environment, and the need to reduce fossil fuel emissions and adopt renewable energy solutions. We are growing a grassroots movement to end fossil fuels and create community-led solutions to the climate crisis. We have 60,000 supporters across the country.

350.org Australia is concerned that this amendment has overlooked multiple issues with carbon capture and storage (CCS), including but not limited to Traditional Owner opposition, climate impacts, and greenwashing. We urge the Committee to note our concerns below and amend the Bill to ensure that they are appropriately addressed.

Traditional Owner opposition

350 Australia acts in solidarity with Traditional Owners all over Australia as they seek to protect Country from fossil fuel expansion. Many of the projects that will benefit from this amendment are opposed by Traditional Owners. For example, the Bayu Undan CCS project would service:

- Santos' Barossa gas project: Tiwi Traditional Owners have run two high profile and successful federal court cases to stop the drilling.¹
- Tamboran Resources' Beetaloo Basin gas project: Traditional Owners across the Northern Territory have opposed fracking the Beetaloo Basin for more than a decade, however Texas-based corporation Tamboran Resources continues to take the project forward.

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<https://www.smh.com.au/environment/climate-change/gas-giant-santos-loses-appeal-against-tiwi-islands-traditional-owners-20221202-p5c32g.html>

- Middle Arm petrochemical hub: Larrakia Traditional Owners oppose the project, which is proposed near the only known Larrakia rock art site,² however this project has received a \$1.5 billion subsidy from the Albanese Government.³

As gas corporations have operated without the consent of Traditional Owners in the past and continue to do so today, there is a risk that they will under-consult the East Timorese and operate the Bayu Undan CCS project without their free, prior, and informed consent.

Climate impacts

The Intergovernmental Panel on Climate Change's (IPCC) Sixth Assessment Report was released last year. It shows how the most vulnerable communities are already impacted by climate change.⁴

350 Australia works with the Our Islands Our Home campaign, a Torres Strait Islander-led climate justice campaign. In the Torres Strait, communities are experiencing increased flood risk, water insecurity, and the destruction of ancestral burial grounds, and Torres Strait Islanders are calling for rapid emissions reductions.

The IPCC makes it clear how important it is to avoid any additional emissions, stating "with every additional increment of global warming, changes in extremes continue to become larger". Climate vulnerable communities should be at the heart of policymaking.

CCS poses multiple climate risks:

- Increase in emissions: CCS enables highly polluting projects to continue to operate. Tamboran's Beetaloo project is expected to release 1.4 billion tonnes of total emissions globally,⁵ and with between 16% and 20% CO₂ content, Santos' Barossa field is more polluting than any other gas field in Australia.⁶

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<https://www.theguardian.com/australia-news/2023/may/11/another-juukan-gorge-darwins-middle-arm-hub-threatens-indigenous-rock-art-traditional-owners-say>

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<https://www.theguardian.com/environment/2023/may/18/darwins-sustainable-middle-arm-development-is-key-to-huge-fossil-fuel-projects-documents-show>

⁴ <https://www.ipcc.ch/assessment-report/ar6/>

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<https://www.theguardian.com/australia-news/2023/may/23/nt-government-knew-it-could-not-reduce-climate-risk-when-it-green-lit-carbon-bomb-gas-production-in-beetaloo-basin>

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<https://australiainstitute.org.au/wp-content/uploads/2023/05/P1392-Barossa-Costs-Under-Safeguard-Mechanism-WEB.pdf>

- Unproven: To date, carbon capture and storage has not been successfully executed at scale. CCS technologies in Australia have already received an estimated \$4 billion, however have not yet cut emissions.⁷
- Minimal benefit: Even if it were to be successful, CCS would only store a fraction of the emissions released by these projects. Analysis shows that even with CCS, Santos' Barossa emissions will remain unchanged.⁸
- Delay the transition: Committing to CCS enables gas corporations to expand operations rather than wind them down, which will delay the transition to clean energy.

Greenwashing

Earlier this year, the Australian Competition and Consumer Commission (ACCC) found that many businesses engage in the practice of greenwashing – environmental claims that may be 'false, misleading, or have no reasonable basis'.⁹

When fossil fuel corporations engage in this practice, they extend their social licence and appear to meet their environmental conditions, which means they can continue to operate or even expand their operations with minimal social or political barriers.

To date, CCS has not been viable at scale. The majority of projects, including the largest in the world – Chevron's Gorgon gas project in Western Australia – have either failed or captured far less carbon than expected.¹⁰ Therefore when corporations claim to cut emissions through CCS, these claims fit the ACCC definition of greenwash as they have no reasonable basis.

On behalf of all of our members, 350 Australia calls on the Committee to note our concerns and amend the Bill accordingly. It is imperative that the voices of Traditional Owners are heeded, and that CCS does not provide an opportunity for further climate damage or greenwashing.

Sincerely,

Lucy Manne
CEO, 350 Australia

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<https://www.theguardian.com/environment/2023/apr/21/emissions-wa-gas-project-chevron-carbon-capture-system-pilbara-coast>

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<https://ieefa.org/articles/ieefa-australia-even-duplicate-pipeline-and-ccs-emissions-santoss-proposed-barossa-project>

⁹ <https://www.accc.gov.au/system/files/Greenwashing%20by%20businesses%20in%20Australia.pdf>

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<https://www.newscientist.com/article/2336018-most-major-carbon-capture-and-storage-projects-havent-met-targets/>