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

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

31 October 2023

Dear Committee Secretary on Environment and Communications,

Queensland Conservation Council is deeply concerned about the climate and cultural heritage impacts of the Middle Arm Industrial Hub. This project is fundamentally incompatible with the climate action the Australian people voted for in 2022, and which Australian Governments have committed to through the Paris Agreement.

Queensland Conservation Council is the peak body for environmental groups in Queensland and has been supporting communities to protect their environment since 1969. We believe that Queensland can and must be powered by 100% renewable energy by 2030 to achieve a safe climate future. To achieve this, Australia must build new renewable energy, not keep approving, and supporting, fossil fuel infrastructure anywhere in the country, including at Middle Arm.

We are deeply concerned by the representation of this project as a “sustainable” precinct, when it would facilitate the development of new gas fields and divert money from proven emissions abatement through renewable energy into costly, unproven and environmentally risky Carbon Capture and Storage projects.

We further do not believe that the consent of the Larrakia people, on whose land this will be built, has been gained, and are deeply concerned that the Middle Arm project would allow gas development to occur in Tiwi Island sea country and the Beetaloo Basin against the wishes of First Nations peoples and with high risk of destruction of their heritage and environment.

We call on you to:

1. Ensure that free, prior and informed consent of Larrakia Traditional Owners is obtained for the precinct, starting with requiring a Larrakia-led and designed cultural heritage and values assessment to be completed for any Environmental Impact Statement (EIS)
2. Recognise the significant impacts of this project on the local environment and national climate and require the highest scrutiny available under the EPBC Act, a Public Inquiry
3. Mandate that any Federal funding not be used for gas related industries at the Middle Arm Industrial Hub (including LNG processing, petrochemical production, blue hydrogen



and carbon capture and storage). This includes the funding of infrastructure to enable supply of renewable energy to gas-based industries at Middle Arm.

4. Require that an EIS includes peer-reviewed offset methodology and climate risk methodology, which can be subject to public scrutiny and comment

We refer you to the submissions from the Environment Centre for the Northern Territory (ECNT) for detailed suggestions on the local environmental and cultural impacts and how to appropriately understand and publicise those.

Queensland is already facing the impacts of climate change, currently in the form of devastating bushfires in southern Queensland, after several flood ravaged years. We need the Federal Government to be leading State and Territories to develop renewable energy and associated industries in a way that protects nature and communities. To do this, we need to stop focusing on building new fossil fuel infrastructure like the Middle Arm Industrial Hub which will only lock us into further climate destruction.

In his expert opinion, Dr Michael Petroni found that the Middle Arm Industrial Hub could increase the NT's emissions by 75%, or 15 megatonnes CO₂e/year¹. That's three quarters of the emissions from the entire Queensland agricultural industry in 2021 (20 Mt CO₂e)². If this is allowed to occur, the emissions reduction task to achieve Australia's climate ambition of a 43% reduction by 2030 and net zero by 2050 will become significantly harder, and the cost placed on households and businesses, while allowing huge corporations to endanger our lifestyles.

Based on the above concerns about global climate change, cultural heritage and the ability of Australia to meet our emissions reduction targets, we urge you to ensure this project undergoes the most rigorous assessment through a Public Inquiry.

Yours sincerely,

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Conservation
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¹ Dr Michael Petroni (2022) [*Expert Opinions Related to Potential Environmental and Human Health Impacts of the Middle Arm Sustainable Development Precinct as well as the Adequacy of the Draft Terms of Reference for Strategic Assessment*](#)

² Qld Government (2023) [*Emissions and targets*](#)