



Environmental
Defenders Office

HAVE YOUR SAY ON WOODSIDE'S PROPOSAL TO PRODUCE FOSSIL GAS TO 2070

URGENT: you can file your appeal by 21 July



What is Woodside's NWS Extension Project?

The North West Shelf Extension project (NWS Extension) is part of Woodside's plan for a massive regional gas processing hub on the Burrup Peninsula / Murujuga, WA.

The facility was due to be shut down this decade. But alarmingly, WA's environmental agency (EPA) has recommended approval of Woodside's plan to continue processing gas for 50 more years.

According to EPA and Woodside documents, this project will cause a massive 4.3 billion tonnes of greenhouse gas emissions over 50 years – more than eight times Australia's 2021 annual emissions!

Burning fossil gas until 2070 is not compatible with a safe climate. If the EPA's decision was aligned with the science, it would have recommended refusal of Woodside's proposal due to its significant climate impacts.

You have a small window of opportunity to have your say about Woodside's dangerous NWS Extension. You can let decision-makers know your views on the EPA's decision by filing an appeal by July 21.

What can I do to about it?

The EPA's report can be found here: <https://www.epa.wa.gov.au/epa-assessment-reports?combine=+1727>

Any person can file a merits appeal if they disagree with anything in the EPA's assessment report or its recommendations regarding the NWS Extension. This is a relatively simple process and creates a legally binding obligation on decision makers to hear your concerns.

The appeal should identify your concerns with the EPA's assessment report/recommendations (what you believe the EPA did wrong or did not consider) and include recommendations for how those problems can be resolved.

All that needs to be filed by this 21 July are the appeal "grounds" – meaning at a minimum you only need to briefly state what issues you are appealing. It is better to keep your grounds broad, and you can provide further submissions on your grounds later.

For the greatest impact, we recommend including things that matter the most to you. Personalising your appeal makes a difference.

Grounds for appeal

It is important to introduce yourself and why you are interested in the project. Although the NWS Extension is based in Western Australia, it is likely to have nationally (and globally) significant impacts, particularly with regards to climate change. This makes the project relevant to all Australians.

EDO's legal experts have reviewed the EPA's report and prepared some basic grounds of appeal. Members of the public can use these, and/or come up with their own grounds of appeal.

1. Greenhouse gas emissions

According to EPA and Woodside documents, the project will cause a total of 4.3 billion tonnes of greenhouse gas emissions (scope 1, 2 and 3) over 50 years – that's more than eight times Australia's 2021 annual emissions. This makes the project one of the most climate polluting projects currently proposed in Australia.

The EPA has suggested some conditions to mitigate the scope 1 and 2 emissions (those arising directly from the project), which would make the project's total emissions 4.128 billion tonnes. However, scope 3 emissions, which result from the gas being burnt for energy, represent the bulk of the emissions from this project and there is no plan to reduce those emissions.

The EPA report includes the total lifetime figure for scope 1 and 2 emissions, but it only includes the annual figure for scope 3 emissions, which means the staggering total figure is not being made available for government decision-making and public scrutiny.

Further, this project would facilitate the development of the Browse Basin gas fields. Development of new gas fields is incompatible with Australia's commitments under the Paris Agreement which require rapid and deep cuts to our emissions.

The EPA did not adequately consider the most-recent science when assessing the impact of extending the life of the North West Shelf facility and its associated emissions on our climate, and in particular the cumulative impact this will have on the environment.

Recommendations

- The EPA should have rejected the project outright. The EPA should have applied the science which has said there can be no new gas developments if we are to limit global warming to 1.5 degrees and avoid catastrophic climate change.
- The EPA should have included information on the project's total greenhouse gas emissions, including emissions resulting from scope 3 emissions (arising from the combustion of the gas produced), and the impacts these are likely to have with respect to climate change.
- The EPA should have recommended conditions that, at a minimum, require the proposal to be made net zero over its lifetime. It is a new fossil fuel project being proposed at a time when emissions must be drastically reduced if Australia and the world are to have any chance of meeting the temperature goals of the Paris Agreement.
- The EPA should have recommended conditions that require Woodside to report on emissions reductions more regularly.
- The EPA should not have relied on the concept of "net zero by 2050" as this is not based on current climate science with respect to required emissions reductions, and is meaningless without being linked to any carbon budget relevant to the goal of the Paris Agreement.
- The EPA should be required to reassess the project with proper regard to the most recent science on warming trajectories from bodies such as the Intergovernmental Panel on Climate Change (IPCC) and to make appropriate recommendations on whether the project is acceptable in the context of up-to-date carbon budgets.

2. Air quality

It is not evident whether the EPA considered the most recent science and standards in relation to air emissions from the project, and particularly their impact on human health. Air quality is already known to be a significant issue, particularly with regard to Benzene and Nitrogen Oxides as a result of current operations.

The EPA has not applied conditions to adequately address air emissions. There are no conditions that require Woodside to take reasonable steps to remove or reduce air emissions from the North West Shelf plant. There are no conditions that require transparent and open air quality monitoring and reporting to enable public scrutiny and accountability for these emissions. There are also no conditions requiring the upgrade of mechanical plant components that would reduce such emissions and improve air quality. There are a range of new technologies that have been developed since the NW Shelf facility was first commissioned that should already have been implemented if Woodside were committed to addressing air quality concerns.

Recommendation

The EPA should have recommended stronger controls on air emissions, including requiring Woodside to retrofit their ageing infrastructure with more appropriate components that can reduce emission sources that are harmful to air quality.

3. Determination

The EPA has recommended that the project may be approved.

Our experts disagree. They believe the EPA should have recommended that the project should not be approved as proposed because it is environmentally unacceptable on a number of grounds.

If the project is approved, it must be subject to more stringent conditions to mitigate the risk of harm to the environment, climate and human health.

Recommendation

The EPA should have stated that the impacts of the proposal are environmentally unacceptable and recommended that the Minister refuse to approve the NWS Extension or, in the alternative, that any approval be subject to more stringent conditions.

The EDO recognises that this project is on Murujuga, which are the lands of the Ngarluma, Yaburara, Mardudhunera, Yindjibarndi and Wong-Goo-Tt-Oo language groups, and Traditional Owners. We pay our respects to their Elders past, present and emerging.

How to lodge your appeal

Lodge your appeal by the deadline – 11:59pm Thursday 21 July 2022.

Appeals cost \$10 and can be made online, via email or post, or in person.

Online

Appeals can be lodged via this website using the [online form](#) however we suggest writing your appeal in a Word document first to ensure you have a saved copy in case any of your work is lost by a technical issue with the website. You can either attach your Word document when submitting the appeal, or write into the box within the online appeal form. When you have submitted your appeal you will receive automatic notification to your nominated email address that your appeal has been received.

1. Go to: <https://www.appealsconvenor.wa.gov.au/Appeal-form>
2. Under 'Type of appeal', select 'Report of Environmental Protection Authority (EPA)'
3. Under 'Report number', enter '1727'
4. Under 'Proposal', enter 'North West Shelf Project Extension'

By email

Appeals can lodged by email to admin@appealsconvenor.wa.gov.au

In person

You can also post or deliver your appeal to the Appeals Convenor, Level 22 Forrest Centre, 221 St Georges Terrace, Perth WA 6000.

If you are not lodging your appeal using the online form, please remember to pay the \$10 fee via the Appeals Convenor's online payment system here:

<https://www.bpoint.com.au/pay/dower.sf/?BillerCode=1586296>.

For any queries about lodgement, please contact the Office of the Appeals Convenor on 08 6364 7990.

If you are running short on time, just submit your broad grounds of appeal. You can provide the supporting detail in written submissions at a later date.

What to expect after you lodge an appeal

Once you have submitted your appeal, the following steps typically take place (usually over several months):

- The Appeals Convenor acknowledges all properly submitted appeals
- Each appellant is given an opportunity for a face-to-face (or online) meeting with the Appeals Convenor to discuss their appeal. You can choose whether or not to take up this opportunity.
- The EPA submits a report to the Appeals Convenor with its responses to all the appeals
- Each appellant who has requested a copy of this report is given an opportunity to submit a written response
- The Appeals Convenor provides its report on the appeals, including recommendations for how the appeals should be disposed of, to the Minister for Environment
- The Minister determines the appeals (each appellant is sent a letter advising of the decision), and publishes their decision and the Appeals Convenor's report online

You can withdraw your appeal at any time by providing written notice.



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