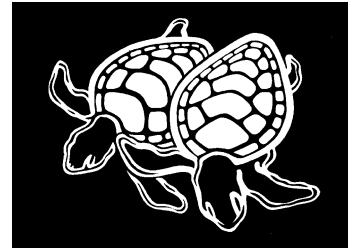


The Environment Centre N.T. Inc

GPO Box 2120 Darwin NT 0801 Unit 3/98 Wood St Darwin NT 0800

Telephone: (08) 8981 1984 Facsimile(08)8941 0387

ecnt@octa4.net.au <http://www.ecnt.org>



Blacktip Project: Draft Environmental Impact Statement, Woodside, October 2004.

A submission by the Environment Centre of the Northern Territory.

Overall Comments

The Environment Centre NT is the peak non-government conservation body in the Northern Territory. We have some major concerns about the Blacktip Project as laid out in the Environmental Impact Statement. First and foremost we consider it to be premature to approve this project on environmental grounds when the associated Trans-Territory Pipeline (TTP) project is currently going through a separate EIS process. There is an obvious need to step back and examine the cumulative impacts of the three related projects – Blacktip, TTP and the Alcan alumina refinery expansion at Gove. Indeed we note the following statement in the EIS that confirms the inter-relatedness of these projects : ‘The Blacktip Project is linked to two other major proposed projects...Without the Blacktip Project, Alcan’s proposed gasification of the refinery will be delayed...Should the Blacktip Project not proceed the TTP will not proceed and vice versa’ (5.2. *No Development Option*, p136). None of the EIS’s we have seen so far considers the cumulative impacts of the three projects. We therefore strongly recommend that approval for Blacktip is contingent upon a much broader strategic environmental review of the three related projects taking place.

Specific Concerns

We also have some more specific concerns about the Blacktip Project which are detailed below. We believe these are sufficient justification in themselves for the project not to receive environmental approval at this stage.

- It is highly probable that, despite the listed mitigation measures, the local turtle population at Yelcherr Beach will be severely impacted by loss of habitat, noise, and lights. Onshore construction of the pipeline will occur in the dry season when the flatback turtles are nesting. According to the EIS, there are possibly less than 20 turtles which nest on Yelcherr Beach. Flatback turtles are also said to be ‘common throughout northern Australian waters’ (7.3.9. *Sea Turtles*, p203). Why then is it listed as vulnerable? There is also evidence, according to local Aboriginal people, of an Olive Ridley turtle nest found at a nearby beach (p204). This was reported during the survey period (*Appendix C*: p6). According to *Appendix C*, it is anticipated that they would nest on Yelcherr Beach as well. Olive

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Ridley turtles are listed as endangered under the International Red List 2000 and the EPBC Act (*Appendix C*, p8).

- There is no discussion in the EIS of the cumulative impacts on the seafloor and benthic and fish communities of all the different drilling wastes such as cuttings, water-based muds and their chemical additives. Drilling waste, including 5764 cu metres of mud and 689 cu metres of drill cuttings, will be largely discharged to sea (*4.4.2. Well Construction*, p59).
- 90,000 tonnes pa of greenhouse emissions will be produced during the normal operations phase. But there is no estimate of flare emissions during commissioning and the early phase of operations which 'will be significantly higher' (*6.3.1. Greenhouse Gases*, p161). 4.5Mtpa of greenhouse emissions will result from Blacktip gas and condensate being used as a fuel source by Alcan and other consumers. Considering 2.2Mtpa of this will result from Alcan's alumina refinery expansion (refer to the Alcan EIS 2004), most of the remaining emissions will result from the consumption of condensate overseas. This is highly significant and represents a 0.6Mtpa increase in Alcan's current emissions as well as a substantial increase in the NT's contribution to global greenhouse emissions. The greenhouse benefits of this project are being overstated in the Executive Summary (pES2). The EIS also states that if required, potential climate change impacts will be investigated in the Greenhouse Gas Management Plan (*12.6.1. Greenhouse Gases*, p427). This should indeed be a prerequisite and is currently a glaring omission.
- Woodside has not yet decided where the packaging and general construction waste will go. It has not assessed if Wadeye landfill has sufficient capacity. Very little detail about the hazardous waste generated in construction phase is provided, especially the quantities of waste (*6.2.1.3 Hazardous Waste*, p156). Hazardous waste will 'most likely' be returned to Darwin in the commissioning phase (p158). This needs to be clarified before any approvals are given for this project to proceed.
- No Social Impact Management Plan (SIMP) is in place yet. There are a lot of social impacts identified that will have negative consequences as well as there being obvious deficiencies in consultation processes. There seems little reason for confidence that a further 2 day workshop, leading to the development of an SIMP, will adequately address these issues. Again one has to question the speedy approvals process for this and related projects (*14. Social Impact Assessment*, p471-475).
- 21 management plans are still to be developed! No approvals should be granted until the bulk of these are completed (*Tables ES-1, ES-2, ES-3, Executive Summary*, pES-15 to ES-21) .
- Some design details of the Project are not confirmed yet e.g the flare at the onshore gas plant (*4.7.2.2. Excess Gas and Flare*, p114).
- There will be two laydown areas on the beach approx 100m by 50 m, yet the exact location is not yet confirmed (*4.5.6. Shore Crossing*, p78). We

wonder if this is due to the turtle nesting sites, but no explanation is offered.

- It very much sounds like the offshore platform will be dumped at sea ('decommissioned') – see 4.9.4 *Wellhead Platform*, p130-131. The options are given as either dumping in deep water as an 'artificial reef' or leaving on-site with the top removed. Both options will permanently alter the marine environment, which is unacceptable. The platform must be completely removed. Yet there is no discussion of this option in the EIS.
- Noise offshore at the Jack-up could reach 182 db and be detected up to 30km away (6.4.3. *Construction Phase Emissions*, p165). This seems very excessive and is likely to be of detriment to marine mammals. The area is potentially dolphin and whale habitat (7.3.7. *Whales and Dolphins*, p195-196). Noise associated with the laying of the pipeline at sea has not even been modelled yet as the exact equipment and vessels that will be used are not currently known. Dugong are known to inhabit areas closer to shore (7.3.6. *Dugongs*, p194).
- There are habitats where threatened species could be found i.e. false water-rat, Northern Brush-tailed phascogale, Red Goshawk, Brush-tailed tree-rat - but none were recorded during the fauna surveys. Field surveys in the region have been extremely limited (8.3.1. *Regional Ecological Setting*, p230). No fish surveys were completed in offshore areas it appears, as the only information provided is from outside the Joseph Bonaparte Gulf (7.3.5. *Fish*, p193). With such limited information it is impossible to adequately assess the impacts on wildlife, including protected species.
- A spill of 100,000 cubic metres of condensate (complete rupture of tanker) 'will not be allowed to happen' says Woodside (11.19. *Hydrocarbon Spills*, p366). Therefore it does not even bother to provide an assessment of this worst-case scenario. This is not good enough. Accidents do happen and the risks must be properly assessed and considered. Furthermore, a contingency plan must be developed.

Instead in the main report only an 8 cubic metre spill is modelled as this is 'likely to occur'. Under this scenario 900 kg of condensate became stranded on shorelines affecting about 1 km of beach, but is expected to evaporate and disperse within 3 days. What, however, are the likely impacts within that 3 day period? The EIS also states that the modelling indicates that even for large spills, oil does not extend to the important turtle nesting sites around Cape Hay and Point Pearce (11.19.2. *Effects on Biota*, p372). But what about the effects on Yelcherr beach nesting sites?

- Modelling of a 500 cubic metres spill of heavy fuel oil is not discussed in the Main Report. Appendix K notes, 'adverse effects from a heavy fuel spill are more likely to be related to coating of wildlife dwelling on the water surface, smothering of intertidal organisms, and long-term sediment contamination'. 400,000kg of oil were predicted to be washed ashore and would impact 50km of beach. This is a significant risk which requires serious consideration. Instead the EIS glosses over this risk.

- The EIS states that ‘source levels of the highest components of humpback whale song are 192 dB re 1 Pa², above the levels generated by drilling and support vessels, indicating that noise generated by drilling will not have an impact on whales’ (11.22. *Noise and Vibration*, p382). This does not necessarily follow logically. What about the duration of the noise?
- 2ha of sand dune habitat will be disturbed and 74 ha of tropical savanna woodland will be cleared. These figures do not include disturbance arising from borrow pits or the upgrade of access tracks to the project area (12.3.1. *Vegetation Clearing and Habitat Loss*, p400-401). What will this entail? There are no details provided in the EIS. Cycads, a protected species, also occur in the savanna woodland to be cleared.
- Nearshore export pipe laying activities may impact the area in the vicinity of the offshore Walpinhthi Reef. There are no details provided as to the level of impact on the reef yet it is acknowledged that this is a sensitive Aboriginal cultural site (13.9. *Aboriginal Heritage*, p459). Discussion of what might be part of the Cultural Heritage Management Plan is somewhat vague. Will Woodside support projects to strengthen environmental cultural values, knowledge and practices or not? (13.10.3. *Summary of Impacts and Management Measures*, p464).
- The EIS does not say how much employment will be generated (13.12. *Economic Environment*, p465). However it is stated that there will be only a minimal number of fulltime jobs after the construction phase (*Exec Summary*, pES2). Only 12% of the predicted \$450 million in capital will be spent in the NT. The revenue benefits to the Australian economy during operations are not even quantified (13.12. *Economic Environment*, p466).
- The offshore risk assessment apparently satisfies ‘Woodside’s corporate acceptance criteria’. (16.2.3. *Summary of Potential Impacts*, p517). How do we know? There is no detail provided in the EIS Main Report or the Appendices. What are the possible consequences of a hydrocarbon explosion at the onshore gas plant? We are told that onshore ‘societal risk contours satisfy the acceptance criteria’. What does this mean exactly? There is an unacceptable lack of information provided about the risks of major accidents in the EIS.
- We also have serious concerns about the following impacts. Approval should not be granted until best-practice management plans are developed to prevent and/or mitigate each of these.
 - the 1-1.4 kilometre wide construction corridor for the pipeline offshore. An estimated 200,000 cubic metres of material will be displaced during trenching (at least).
 - produced water from the onshore plant to be discharged at sea approximately 3km offshore. Up to 7800 bpd of produced water is to be discharged during the start up phase of the pipeline.
 - fauna falling into the pipeline trench during construction.

- Weeds being introduced into the Wadeye area by workers, trucks etc.

Summary

This EIS is incomplete and inadequate. It does not provide a sound basis for any government approval of the project. It does, however, raise many serious questions about the impacts of gas-based industrialisation in the Northern Territory. ECNT therefore strongly recommends that, together with the TTP and the Alcan expansion, the Blacktip Project undergo a much higher level of strategic environmental assessment.

ECNT
18/1/05