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Central Petroleum's Amadeus Basin EMP: ALEC Submission

The Arid Lands Environment Centre (ALEC) is Central Australia's peak community environmental organisation that has been advocating for the protection of nature and ecologically sustainable development of the arid lands since 1980. ALEC actively contributes to the development of energy and resources policy through written submissions and advocacy within the community.

ALEC welcomes the opportunity to make a submission on Central Petroleum's (CPs) Northern Territory Drilling Campaign (NTDP). ALEC would like to recognise the comprehensive nature of CPs EMP and the range of environmental impacts in which it plans to mitigate.

However, ALEC does not support the nature of CPs EMP which has grouped together five different projects under the one EMP. The nature of the grouping of five different projects has made it confusing to distinguish the potential environmental impacts. CPs EMP conflates: four separate gas fields (Dingo, Orange, Palm Valley, Mereenie), one oil field (Surprise) including both exploration, development and production activities across three different bioregions (Finke, West Macdonnell and the Great Sandy Desert) and separated by over 300kms.

According to *Petroleum (Environment) Regulations 2016* Section 8(2) "A plan must relate to only one regulated activity, regardless of whether the activity is to be carried out in one or more locations". ALEC considers CPs EMP to combine five separate regulated activities. ALEC considers that each of these five different projects should be dealt with individually, rather than as one EMP. ALEC is of the view that CP in the completion of their EMP is focused on streamlining their operations, rather than completing an EMP in their required intentions.

ALEC considers CPs EMP to play down the cumulative and climate impacts of its five separate proposed projects. ALEC considers that it is important that CP support the local community and landholders in managing changes to

biodiversity, water and climate.

In addition, ALEC does not support an expansion of oil and gas exploration and development in the Amadeus Basin as it runs counter to the definition of Ecologically Sustainable Development as outlined in the *Environment Protection Act*. In addition, the expansion of fossil fuel reserves goes against Australia's international climate commitments to the Paris Agreement and its goal to limit global temperature increases to 1.5°C.

ALEC urges the Minister to not approve this EMP in its current form as it does not meet the definition of a single regulated activity and instead conflates five separate projects into one.

ALEC is happy to be contacted to discuss our comments further.

Alexander Vaughan

(Policy Officer)