

Xanthopoulos, Liz – Wednesday, 29 May 2019 – 10:56:44

Subject	Re: Objection to Origin Energy's Environmental Management Plan (EMP)
From	Liz Xanthopoulos
Sent	29/05/2019 10:56:44 AM

To whom it may concern at the Department of Environment and Natural Resources (DENR),

Re: Objection to Origin Energy's Environmental Management Plan (EMP) for the Kyalla Drilling and Hydraulic Fracturing 2019 Program EP117 N2

Thank you for the opportunity to make a submission regarding this issue.

I write this submission to ask the Department of Environment and Natural Resources to outright reject Origin Energy's EMP to protect the land, water, health and wellbeing of impacted communities as well as our shared future from climate change.

As a member of the community, I am deeply concerned about the risks associated with Origin Energy's plans for drilling and hydraulic fracturing in the Northern Territory. I strongly object to the approval of this EMP for the following reasons:

1. Approval of this EMP will lead to irreversible climate change impacts for people of the Northern Territory and beyond. The Northern Territory is already experiencing the impacts of climate change, and is predicted to be one of the most severely impacted if emissions are not rapidly reduced [1]. Remote Aboriginal communities across the NT feel this first and worst: extreme heat waves, water shortages and more extreme flooding could force many Aboriginal people to move off their country. Approving this EMP, one of nine exploration wells, would signal the Beetaloo Basin as "open for business" to the expansion of the gas industry, potentially leading to emissions 20 times Australia's total current annual emissions [2]. This would pose a serious climate change threat to communities across the NT and beyond.

2. Storage of wastewater in open air tanks poses unacceptable risks and is incompatible with the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory (Inquiry) recommendation 7.12 that stated "enclosed tanks must be used to hold all wastewater." [3] Climate change means that seasons and weather patterns are changing, particularly across the NT in relation to wet season (Oct 2018 to April 2019 was the driest wet season since 1992 and the hottest wet season on record) [4]. This means that there can be big storms out of season, and having open tanks with fracking wastewater (at any time of the year) would put drinking water, wildlife and health of community members and children at risk, including communities up and downstream.

3. Origin Energy have failed to appropriately consult with all Traditional Owners, Aboriginal people and impacted communities. A report from the Jumbunna Institute for Indigenous Education and Research (UTS) found that most, if not all, exploration permits issued in the Northern Territory (including Origin Energy) for unconventional gas were issued in the absence of Free, Prior and Informed Consent from Traditional Owners [5]. Furthermore, the Inquiry found that Aboriginal communities overwhelmingly opposed fracking on their land. The findings from the UTS report suggest reasons for concerns regarding all of Origin Energy's consultation practices, including consultation regarding this Environmental Management Plan with all Traditional Owners, Aboriginal communities and appropriate cultural authorities for the areas impacted both directly and indirectly.

4. The use of dangerous chemicals poses huge risks to the environment, water and community health and are exacerbated by the use of open storage tanks. There are some really concerning chemicals that Origin Energy plans to use down well and store on-site over the dry and wet seasons. This means that the chemicals will not only be used down the well in the high pressure fracking process, but will also pose a risk at the surface when in open storage as flowback fluid.

For these reasons, any plans for drilling and hydraulic fracturing, including exploration, should not be allowed to go ahead under any circumstances.

Below are a list of my recommendations:

1. The DENR should take a precautionary approach to the cumulative climate impacts of this exploration well - knowing the risk of the expansion of the gas industry in the Northern Territory will have dangerous and irreversible impacts on our climate in a time when we need to rapidly decarbonise the global economy and energy system.

2. All waste water should be held in enclosed tanks at all times.

3. We request that additional time, including a consultation period and process, is allowed for Traditional Owners, Aboriginal communities and appropriate cultural authorities for the areas directly and indirectly impacted by this EMP to consider this information and be given a fair chance to ask questions and respond.

4. All chemicals must be adequately health tested before being used in any fracking processes. They should also require companies to publicly disclose the identities and Chemical Abstracts Service numbers of chemicals that are manufactured commercially, and identify oil and gas wells in which the chemicals are used.

I write this submission in support of many Aboriginal communities across the Northern Territory, primarily within the Beetaloo region, who are concerned about the potential damages that fracking could cause to water, to country, to songlines as well as the long term effects of climate change.

I wait with serious concern for your response to these matters.

[1] The Australia Institute "Cooked with gas" 2018
<http://www.tai.org.au/sites/default/files/P510%20Cooked%20with%20gas%20-%20Darwin%20days%20over%2035C%20FINAL.pdf>

[2] The Australia Institute "NT gas compared to coal-fired power plants"
<http://www.tai.org.au/content/nt-gas-compared-coal-fired-power-plants>

[3] Final Report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory 2018 <https://frackinginquiry.nt.gov.au/inquiry-reports?a=494286>

[4] Bureau of Meteorology "Seasonal Climate Summary for Northern Territory"
<http://www.bom.gov.au/climate/current/season/nt/summary.shtml>

[5] Jumbunna Institute for Education and Research "Hydraulic Fracturing and Free, Prior and Informed Consent in the Northern Territory: A Literature Review" <https://accr.org.au/wp-content/uploads/Jumbunna-FPIC-review-final.pdf>

Yours sincerely,
Liz Xanthopoulos

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Please reply to Liz Xanthopoulos at *****.

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