

North West Shelf Project Extension

Background

Woodside's North West Shelf is one of the oldest and most polluting gas processing and export facilities in Australia, located on Murujuga (also known as the Burrup Peninsula) in the Pilbara, Western Australia.

Woodside and its joint venture partners had permission to process gas at the North West Shelf until the current gas fields are depleted (this decade), but they are now seeking to extend the life of this facility until 2070. This request is commonly referred to as the 'North West Shelf Extension' proposal.

The North West Shelf facility is the biggest industrial emitter in Western Australia. The ongoing operation of the North West Shelf facility until 2070 will emit an additional 4.395 billion tonnes of carbon pollution. That's equivalent to 12.1 million car journeys, around the world, every year, for the next 50 years. The scale and emissions intensity of this extension is enormous and will have a significant impact on our climate.

What's happened?

On 4 November 2022, the federal government announced that it would be reconsidering the environmental impacts of the North West Shelf Extension.

The announcement also invited the public to submit comments to the Federal Minister for the Environment, Tanya Plibersek.

Why is this happening?

In May 2019, the Commonwealth announced that the North West Shelf Extension required federal approval due to its potential impacts on the World Heritage nominated Murujuga rock art. However, this original decision about the project's impacts did not properly consider the climate impacts of its greenhouse gas emissions on the climate.

In July 2022, the Environment Council of Central Queensland (ECoCeQ) made a request for the new Labor government to reassess 19 coal and gas proposals across Australia, based on new information about the risk of harm to the environment from climate change. Earlier this month, federal environment officials agreed to look at 18 of those proposals. The North West Shelf Extension is one of them.

How can the Minister reconsider the North West Shelf extension?

The Environment Minister is able to re-examine the North West Shelf Extension and the other 17 proposals because of a clause in the *Environment Protection and Biodiversity Conservation Act 1999* – commonly known as the EPBC Act.

Section 78A of the act allows the Federal Minister for the

Environment to consider whether a proposal – like the North West Shelf Extension – could have a significant impact on Matters of National Environmental Significance (MNES) and which MNES, specifically, are potentially at risk.

What happens next?

The Federal Minister for Environment, Tanya Plibersek, is now inviting the community to make public comments on whether she should reconsider the environmental impacts of the North West Shelf Extension to include the climate impacts of the project's greenhouse gas emissions.

Public comment is open until 8:59pm AWST on 24 November 2022.

Once the window for public comment has closed, the Minister will make her decision.

The Minister can choose to either uphold or revoke the original decision – and make another, new decision in its place. This will depend on the provision of substantial new information about the impact of the North West Extension on MNES.

What can I do to help?

You can make a public comment to help influence Minister Plibersek's decision about whether to reconsider the environmental impacts of the North West Shelf Extension.

Please spread the word and encourage others to do the same.

What to include in your comment

Processing gas until 2070 is totally incompatible with the review that has been triggered by an application under section 78A of the EPBC Act.

Under the act, the Federal Minister for the Environment has a duty to review any 'substantial new information' relating to 'significant impacts' on 'Matters of National Environmental Significance'. Therefore, your public comment should include all three of these elements to be considered by the environment minister.

What are Matters of National Environmental Significance?

Matters of National Environmental Significance (MNES) are nationally significant animals, plants and places protected under federal environmental laws. The MNES relevant to the North West Shelf Extension include:

- World heritage properties
- National heritage places
- Wetlands of international importance, often called 'RAMSAR' wetlands, after the international treaty under which they are listed
- Nationally threatened species and ecological communities
- Migratory species
- Commonwealth marine areas
- The Great Barrier Reef Marine Park

The Federal Minister for the Environment is legally obliged to protect the thousands of MNES across Australia.

What does the EPBC Act consider a 'significant impact'?

A significant impact is an impact that is important, notable or of consequence in regard to its context or intensity. Note that the impact of an action does not need to be direct; an impact which occurs later in time or across the country is still an impact. For example, the North West Shelf Extension would emit billions of tonnes of greenhouse gas emissions, contributing to climate change, which will in turn have an impact on the Great Barrier Reef.

What does the EPBC Act consider 'substantial new information'?

Substantial new information means information that has come to light since the original decision was made in May 2019. "Substantial" means information that is real and not trivial, and which is a form of factual evidence. For example, the IPCC's Sixth Assessment Report.



Step-by-step guide to making your public comment

The Minister for the Environment is obliged to take public comments into consideration when making her final decision, so this is a very important opportunity for you to have your say.

You don't need to be an expert to make a public comment. While it is important to make a clear, logical argument, you can also refer to personal experiences of the impacts of climate change on matters of national environmental significance, especially in the **Any other comments** section. You can copy and paste example arguments from this guide, but you are encouraged to personalise your comment as much as possible.

Note: you might like to draft your public comment on your computer in a Word document, then copy it onto the government webpage.

CLICK HERE TO OPEN THE EPBC PORTAL AND MAKE YOUR COMMENT

1. Click 'Make a Comment'

2. Fill in your details

- Provide title for your comment, such as "Please reassess the environmental impacts of the North West Shelf Extension"
- Provide your full name and email address

3. For the 'substantial new information' box – select YES

Do you consider there is **substantial new information** available about the impacts the action has, will have or is likely to have on a matter protected under Part 3* of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)?

If unsure, skip this question and provide your comments in the comment box below.

Yes	No
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ECoCeQ and their Environmental Justice Australia legal team assert there is substantial new information about the climate harm from the NWS Extension. This means that the new information is real, not trivial, and is a form of factual evidence.

4. Provide reasons for your answer and/or any comments in the box provided

This is where it is important to urge the Minister to recognise that the material that ECoCeQ provided in their reconsideration request clearly meets the threshold of 'substantial new information'.

You can copy and paste sections from below, as well as choose to include evidence of potential impacts on 'matters of national environmental significance' that you care most about. [You can find a list of MNES on the Living Wonders website here.](#)

Since the original decision about the North West Shelf Extension was made in May 2019, substantial new scientific information has been collated, detailing the significant climate impacts of greenhouse gas emissions on matters of national environmental significance (MNES) in Australia.

Since 2019, the Intergovernmental Panel on Climate Change (IPCC) has published its Sixth Assessment Report, which provides the most recent comprehensive assessment of the current state of scientific knowledge about observed and projected future climate change, impacts and adaptation to climate change, and approaches to reducing human-caused climate change.

Step-by-step guide to making your public comment cont.

As detailed in the report, there is now a global scientific consensus that the greenhouse gas emissions created by the burning of fossil fuels are causing widespread and irreversible harm to people, ecosystems, species and the biosphere as a whole.

Limiting the potential impacts of climate change on MNES requires deep and immediate reductions in greenhouse gas emissions. Every tonne of carbon dioxide emissions adds to global warming, and every fraction of a degree of global warming causes clearly discernible increases in the intensity and frequency of hot extremes, precipitation events and ecological droughts.

The physical effects of increased global warming in Australia, caused by the burning of fossil fuels, are likely to have a significant impact on thousands of MNES, as outlined by the Environment Council of Central Queensland in its reconsideration request.

If the North West Shelf Extension goes ahead, the emissions from this project –projected to be approximately four billions tonnes of CO₂-e in total –will likely result in significant impacts, as every tonne of CO₂ is material to global warming.

Please reconsider the original decision made about the North West Shelf Extension in 2019, taking into consideration the overwhelming evidence in the form of substantial new information provided by ECoCeQ, which demonstrates the extensive and irreversible impacts the North West Shelf Extension would have on countless matters of national significance. It is critical that the thousands of MNES affected by climate impacts are taken into account when making a federal approval decision about a fossil fuel proposal of this magnitude.

5. The ‘substantial change in circumstances’ box – select NO

ECoCeQ is not relying on this argument, so this question is irrelevant.

Do you consider there has been a **substantial change in circumstances** that was not foreseen at the time of the first referral decision and that relates to the impacts the action has, or will have or is likely to have on a matter protected under Part 3* of the EPBC Act?

If unsure, skip this question and provide your comments in the comment box below.

Yes	No
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6. Provide reasons for your answer and/or any comments in the box provided

ECoCEQ is not relying on this argument, so you can type ‘N/A’ into the comment box provided.

7. Add any other comments

If applicable, **provide any other comments** on whether you consider there are reasons to revoke the first referral decision and substitute a new decision. This may include any other comments on whether a matter referred to in any of paragraphs 78(1)(a) to (ca) of the EPBC Act applies in relation to the action. (The current version of the EPBC Act can be accessed through the [Department's website](#)).

This is your opportunity to have your say on why you think it is important for Tanya Plibersek to reconsider the environmental impacts of the North West Shelf Extension. Why do YOU think that climate impacts of the project should be considered?

You can choose to copy and paste sections from below, as well as share your thoughts on the significance of potential climate impacts of the North West Shelf Extension. If there is something that is particularly important to you, such as personal anecdotes and experience of climate impacts on the environment, please include these whilst also referring to the data and evidence of climate change.

Step-by-step guide to making your public comment cont.

Approving the North West Shelf Extension to process gas until 2070 is completely incompatible with goals to achieve net-zero emissions, which is necessary to stabilise human-induced global warming at any level.

The North West Shelf Extension is likely to have significant adverse impacts on thousands of matters of national significance (MNES), as outlined by the Environmental Council of Central Queensland (ECoCeQ), due to the project's contribution to climate change via cumulative greenhouse gas emissions.

As the Federal Minister for the Environment, you are required to take into account the precautionary principle when assessing fossil fuel projects, which means that measures must be taken to prevent harm to the environment when there are threats of serious or irreversible environmental damage.

In order to fulfil your obligation to protect the thousands of MNES across Australia, it is critical that the climate impacts of the North West Shelf Extension on each MNES are taken into consideration when deciding whether the project requires federal approval, under which controlling provisions. For example, the significant impacts of climate change on RAMSAR wetlands, the Great Barrier Reef and Ningaloo Reef, our oceans, as well as threatened species and ecological communities across Australia.

8. Final steps: confidentiality and privacy

Tick the Yes/No box to indicate whether your comment is confidential.

Then read the privacy statement and declaration.

9. Submit your comment

Thank you for taking this important action for our climate and environment. Please spread the word and encourage others to do the same.

Have any questions?

If you would like further assistance in writing your public comment, you can attend [one of the several writing parties held by Living Wonders](#) before Thursday 24 November 2022.

Please don't hesitate to contact the staff at CCWA if you have any questions!

Phone: 08 9420 7266
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