

# Appeals Guide: North West Shelf Extension

**Help stop Woodside's climate disaster by submitting an appeal online by 11:00pm AWST on 21 July**

## Background

Western Australia's environmental agency (EPA) has just recommended approval for Woodside's proposal to extend operation of its massive North West Shelf gas processing facility. This means Woodside would be allowed to keep it operating until 2070 - 20 years after Australia is meant to be at net zero emissions. If approved, it is estimated the extension would pump out 4.3 billion tonnes of pollution from climate-wrecking gas through to the 2070s.

The North West Shelf extension is part of Woodside's bigger climate-destroying Burrup Hub proposal. It plans to exploit two new sets of fossil fuel gas fields off the pristine coast of Western Australia: Scarborough and Browse. Gas from these fields would be piped back to shore and then processed at two onshore plants: Pluto and the North West Shelf. The Burrup Hub mega project would add a staggering 6.1 billion tonnes of climate pollution to our atmosphere, right at a time when the world needs to rapidly reduce emissions to have any chance of limiting warming to 1.5°C.

The North West Shelf is one of Australia's oldest and most polluting gas processing plants. Opened in the 1980s, it was due to be decommissioned within the next decade. Instead, Woodside is dusting it off and seeking approval to extend the life of this facility to keep processing gas until 2070.

The EPA recently released a report containing its assessment of the North West Shelf extension and recommending that the project be approved. This report is used as the formal assessment information that both the state and federal Environment Ministers will use to decide whether or not to approve the project.

We now have a narrow window of time in which to appeal this recommendation and have the project reassessed based on the best and most up to date science.

## Next steps

We have until 21 July 2022 to appeal the EPA's assessment and recommendations. Greenpeace believes that the EPA has failed to properly consider the impacts of this project on the climate and environment, and has failed to recommend conditions that will adequately address the significant environmental harm that extending the life of the North West Shelf facility will cause. Given these significant impacts, we believe that the proposal should be sent back to the EPA for additional assessment.

# How you can help

---

## Lodge an appeal to the WA Appeals Convenor to investigate concerns with the EPA's report

You can read the EPA's report here: [https://www.epa.wa.gov.au/epa-assessment-reports?combine="+1727](https://www.epa.wa.gov.au/epa-assessment-reports?combine=)

Appeals must focus on inadequacies with the EPA's assessment or recommendations. Your appeal should list the grounds of appeal (what you believe the EPA did wrong or did not consider) as well as the remedy you are seeking. You could suggest new evidence to be assessed, conditions to be added or amended or for a recommendation against the acceptance of the project. You can also emphasise that the EPA may not have acted according to their duties as described in the *Environmental Protection Act 1986 (WA)*, namely, to protect the Western Australian environment (s4A) and to prevent, control and abate pollution and environmental harm (s15).

For the greatest impact, we suggest personalising your appeal by paraphrasing and rephrasing the grounds below, or adding your own. **Some potential grounds for appeal that you could include are:**

### **Lack of proper consideration of scope 3 greenhouse gas emissions**

Scope 1 emissions are those produced by the North West Shelf facility, such as processing the gas to make it ready for sale and export. Over the 50-year life of the extension proposal, total scope 1 GHG emissions are estimated to be up to 385 million tonnes (Mt) of CO<sub>2</sub>-e (Woodside 2021b). Scope 2 emissions are those produced by the electricity used to run the North West Shelf facility and are quite small. Scope 3 emissions are all other upstream and downstream emissions associated with the product, such as when the end user burns the gas.

The proponent estimates that the extension proposal's scope 3 GHG emissions from the third-party consumption of LNG, LPG, Domgas and condensate (e.g. combustion of LNG to produce energy), will be approximately 80.19 Mt of CO<sub>2</sub>-e per annum based on currently available and quantifiable information (Woodside 2021b). This would be around 4 billion tonnes of emissions over the fifty year operating life described in the EPA's report, although the total lifetime figure is not included in the report.

The EPA's report does not assess whether the project's scope 3 emissions impacts are acceptable. This is alarming given that it appears that the project could emit at least 3.5 billion tonnes of CO<sub>2</sub> emissions, maybe nearly as much as 4.4 billion tonnes. That's equivalent to approximately 8 years' worth of Australia's current annual emissions.

The EPA should be required to reassess the possible scope 3 impacts of the project (including the potential global temperature increase and its impacts on the environment) and recommend against accepting the project due to its anticipated climate harm.

## **Lack of proper consideration of indirect impacts on Matters of National Environmental Significance**

Under the *Environment Protection and Biodiversity Conservation Act 1999*, s527E stipulates that indirect consequences of an action are defined as an impact of the action, providing they are a substantial cause of the impact. For instance, this section should be applicable as it is clear that: processing gas at the North West Shelf is done for the purpose of selling this gas for use (combustion) as energy; processing and using gas releases greenhouse gas emissions; rising greenhouse gas emissions are warming Earth's atmosphere; and global warming is resulting in a broad suite of devastating consequences for Matters of National Environmental Significance (e.g. threatened species or World Heritage Areas like Ningaloo Reef).

Following this logic, the EPA has failed to assess the climate-related impacts of scope 1, 2 and 3 emissions on Matters of National Environmental Significance. Matters of National Environmental Significance include World Heritage Areas like the Great Barrier Reef and Ningaloo Reef, and threatened species like blue whales, koalas and green turtles. The EPA should be required to reassess the potential climate-related impacts on these important species and places and recommend against accepting the project due to its anticipated climate-related harm to the environment. You could personalise your appeal by presenting your favourite places and animals that you are concerned could be impacted.

## **Lack of proper consideration of Australia's emissions reduction commitments**

The EPA determined that the project's annual scope 1 emissions were approximately 8.3% of WA's total emissions for 2019 and 1.4% of Australia's total emissions for 2019. Several recommendations were made to reduce the project's scope 1 emissions to net zero by 2050, with most of these reductions relying on offsets. However, no assessment has been conducted on whether the project is consistent with 1) Australia's commitment to the Paris Agreement to "[hold] the increase in the global average temperature to well below 2°C above pre-industrial levels and pursu[e] efforts to limit the temperature increase to 1.5°C above pre-industrial levels", and 2) the federal government's commitment to the United Nations Framework Convention on Climate Change Secretariat to reduce domestic emissions by 43% by 2030 and to reach net zero emissions by 2050.

The EPA could be asked to reassess the proposal with a proper analysis of whether the project aligns with the assumptions underlying the federal government's emissions reduction targets and whether it is consistent with pathways to limiting warming to 1.5°C (such as the International Energy Agency's Net Zero Emissions by 2050 scenario).

# How to lodge your appeal

---

**Appeals can be lodged via an online portal.** It costs \$10 to lodge an appeal and payments can be made through the portal using a credit or debit card.

1. Go to <https://www.appealsconvenor.wa.gov.au/Lodge-appeal>
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'
5. Click 'Next'
6. Type your full appeal into the box under 'What are your concerns'. Alternatively, write your appeal into a document and click 'Add document'.
7. Click 'Next'
8. Enter your name and contact details into the boxes provided. If you are making this appeal on behalf of yourself, choose 'Individual'. If you are making an appeal on behalf of an organisation, choose 'Corporation'. If you are lodging one as yourself and one on behalf of an organisation, please be sure to use different email addresses for each appeal.
9. Click 'Review your appeal'
10. Check that your lodgement details are correct
11. Click 'Proceed to payment'
12. Enter your payment details into the payment portal. You can pay using a credit or debit card.
13. Once the payment has been processed, you will be provided with a receipt number. Make a note of this number as you will be immediately asked to enter it into the appeals portal.
14. Once your appeal lodgement is finalised, you will receive a confirmation email.
15. You will receive correspondence from the Appeals Convenor as they process the appeals. This may take several weeks.