

# **BROWSE CARBON DUMPING SUBMISSION GUIDE**

SUBMISSIONS CLOSE 24 JULY



**Conservation  
Council of WA**

## Document Overview

Woodside has submitted its Browse Carbon Capture and Storage (CCS) proposal for carbon dumping at Scott Reef for the Federal Environment Minister's assessment.

The Minister must decide whether the project needs further environmental assessment to determine if it will significantly impact matters of national environmental significance.

**The public now have until July 24th to make submissions about this proposal.**

The most effective means of engaging in this process is to write your own unique high-quality submission, and this guide has been designed to support you to do just that.

## Context

As part of its proposed Browse gas development at Scott Reef, Woodside must abate a small portion of the 1.6 billion tonnes of carbon pollution it is expected to produce. Woodside has submitted a proposal to dump around 3% of its Browse carbon pollution at Scott Reef over a 50-year period.

Carbon dumping is a proven failure at abating emissions from large scale gas projects. Globally, approximately 78% of carbon capture projects have been cancelled or put on hold<sup>1</sup>. Projects that do manage to become operational severely underperform by up to 90%<sup>2</sup>.

The Browse carbon dumping project near Scott Reef could have unprecedented impacts on marine and terrestrial environments through decades of piping, injecting and seismic blasting to monitor carbon pollution in an area already hard hit by the warming impacts of climate change, and proposed industrial development.

**This is a separate but related proposal to the Browse to NWS proposal for 50 gas wells for extraction and export of LNG. The Browse extraction proposal relies on the CCS proposal. As such, the cumulative risks to the marine environment should be assessed together.**

You can find all the project documents [here on the EPBC Portal](#).

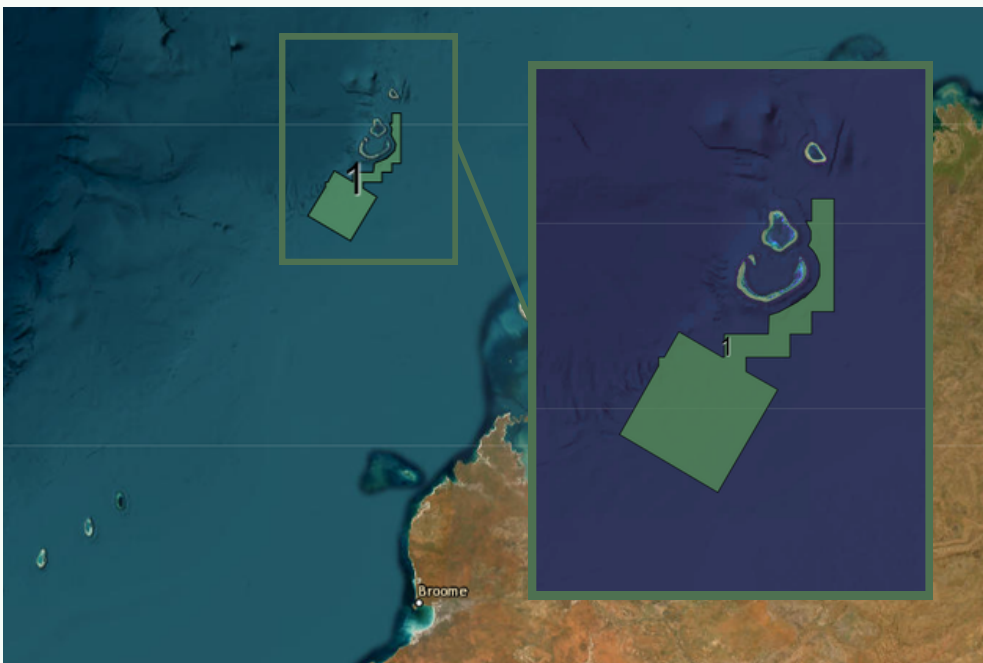
## Project Overview

**Name:** Browse Carbon Capture and Storage Project (EPBC 2026/10569)

**Location:** 6kms from Scott Reef, 270 NM north of Broome, WA

**Proponent:** Woodside Energy

**Proposal:** The Browse Carbon Dumping Project proposes to capture and store up to 4 million tonnes of CO<sub>2</sub> per annum from the proposed Browse gas development in a deep offshore geological formation beneath the seabed, just over 6kms from the Scott Reef complex. The project would involve a 130 km subsea CO<sub>2</sub> pipeline, multiple injection wells and long-term seismic blasting.



Map of proposed Activity. Source: [Department of Climate Change, Energy, the Environment and Water](#)

## Why make a submission?

Making a submission on this project is an important way to send a message to regulators and the Government that communities across Australia want proposed carbon dumping projects to be subject to a high level of scrutiny.

The Minister needs to decide whether this proposal will significantly impact a matter of national environmental significance (MNES). The relevant MNES for this referral are:

- Nationally threatened species
- Migratory species
- Commonwealth marine areas

## How to make a submission

1. Go to the [EPBC Portal Website](#)
2. Select Make Comment
3. Provide title for your comment (e.g. 'Reject Browse Carbon Dumping at Scott Reef')
4. Enter your name and email address
5. Do you consider this is a controlled action? **Answer YES**
6. Provide reasons for why you believe this is/is not a controlled action. **Enter your submission points here or attach a document in step 9. See our submission notes below.**
7. Is your response confidential? **(your choice)**
8. Confirm you've read the privacy note and declaration
9. You may wish to write additional information and upload it as a supporting document
10. Enter the code from the image
11. **Submit** your comment
12. Let us know you've made a submission by emailing [greta.carroll@ccwa.org.au](mailto:greta.carroll@ccwa.org.au)



Image: Scott Reef, Nush Freedman

## Submission Notes

You should address your submission to the Environment Minister Murray Watt and explain in your own words why he should refuse to accept the referral.

**Recommendation 1: The Minister should not accept this referral in line with section 74A, as Browse CCS is a component of the Browse to North West Shelf (NWS) Project to capture and store the carbon dioxide (CO<sub>2</sub>) from the processing of Browse gas.**

**Reasoning:** This proposal is a necessary component for Woodside's proposed Browse to North West Shelf Project, as such the risks and impacts of the two projects should be considered together when assessing the Browse CCS referral.

**Recommendation 2: If the Minister accepts the Referral under s74(1), the Minister should decide in accordance with s74B(1)(b) that it is clear the Proposed Action would have unacceptable impacts on matters of national environmental significance.**

**Reasoning:** This project should be rejected because it would have will have impacts on protected matters under the EPBC Act. These include:

- More than 25 threatened species, including
  - Sei, pygmy blue, and fin whales
  - Loggerhead, green, leatherback, hawksbill, olive ridley, and flatback turtles
  - Whale and scalloped hammerhead sharks
- More than 41 migratory species, including humpback whales and manta rays
- At least 13 biologically important areas for turtles, sharks, and whales
- Breeding habitat critical to the survival of Scott-Browse green turtles
- Commonwealth Heritage Place: Scott Reef and surrounds
- Kimberley Marine Park

**Unacceptable Impacts:** The Department's own Conservation Advice for the endangered Dusky Sea Snake recognises the Scott Reef complex as the last remaining stronghold for the dusky sea snake population and recommends protecting [the species] from damaging impacts from the local fossil fuel industry and marine activity, including the development of the Torosa gas field.<sup>3</sup>

This proposal contravenes the primary conservation objective for this threatened species.



Image: Scott Reef, Nush Freedman

Seismic blasting, required at regular intervals for 50 years for this project, would put the marine environment at Scott Reef – including endangered and threatened species – at unacceptable risk of injury, displacement and mortality<sup>4,5</sup>.

Of note, seismic surveys have been shown to kill zooplankton at least 1.2 kms away from the active source<sup>6</sup>. As the foundation of the marine food web at Scott Reef, ongoing and repeated surveys will impact the availability of food for all species that rely on Scott Reef's unique upwelling system for foraging, including the pygmy blue whale and green sea turtle populations.

Passive Acoustic Modelling (PAM) is an unacceptable seismic mitigation measure by Woodside as it can misidentify a lack of pygmy blue whales in the area while foraging, as deep feeding dives are not accompanied by vocalisation<sup>7</sup>.

Carbon leakage can create localised acidification, threatening shell-forming organisms such as coral, molluscs and crustaceans. While Woodside's assessment is that this is a low-probability but high-consequence risk, carbon dumping has proven a failure previous and other trials have experienced leaking<sup>8</sup>.

**Recommendation 3: Apply the precautionary principle. Where there is uncertainty about long-term containment, leakage consequences, cumulative impacts or impacts on protected matters, the Minister should adopt a precautionary approach and should not rely on claimed climate benefits unless they are demonstrated to be genuine, verifiable and durable. On this basis, the Minister must refuse to accept the referral under s74B(1)(b) of the EPBC Act.**

## References

1. Nan Wang, Keigo Akimoto, Gregory F. Nemet (2021), What went wrong? Learning from three decades of carbon capture, utilization and sequestration (CCUS) pilot and demonstration projects
2. IEEFA. Carbon Capture and Storage: An Unproven Technology. (n.d.). <https://ieefa.org/ccs>
3. DCCEWW, 2024, Conservation Advice for Aipysurus fuscus (dusky sea snake), pg 24. Online <https://www.environment.gov.au/biodiversity/threatened/species/pubs/1119-conservation-advice-04092024.pdf>
4. De Lestang. S, How. J, Rushworth. K, and Erbe. C. (2024). Boom, shake the room: Seismic surveys affect behaviour and survival of western rock lobster. DPIRD.
5. Knuckey, I. A., Koopman, M., Kelaher, B., Millar, R. B., & McShane, P. E. (2026). Seismic acquisition causes substantial decrease in catch rates of commercially-important fish. Marine Environmental Research, 216, Article 107886.
6. McCauley, R., Day, R., Swadling, K. et al. Widely used marine seismic survey air gun operations negatively impact zooplankton. Nat Ecol Evol 1, 0195 (2017). <https://doi.org/10.1038/s41559-017-0195>
7. Fitzpatrick, B. and Meynecke, O. (2026). *Technical Assessment of Woodside's Browse Pygmy Blue Whale Management Plan*. Oceanwise Australia, prepared for Greenpeace Australia Pacific. [https://www.greenpeace.org.au/static/planet4-australiapacific-stateless/2026/04/67460273-woodside-pygmywhale-report\\_converted-1.pdf](https://www.greenpeace.org.au/static/planet4-australiapacific-stateless/2026/04/67460273-woodside-pygmywhale-report_converted-1.pdf), p.13
8. Peter Milne, 2017, Gorgon CO2 injection stopped by leaks and corrosion, Boiling Cold.