



darebin climate action now

Submission regarding *Valhalla Gas Exploration and Appraisal Program*

I am writing on behalf of Darebin Climate Action Now (DCAN), which is a community group based in the northern suburbs of Melbourne. DCAN has campaigned for a safe climate future since 2007 and has over 6,000 supporters. We work with the community, all levels of government, and community leaders to provide information and put forward strategies to mitigate the risks posed by the climate emergency.

DCAN is extremely concerned about the current proposal by the Texas-based Black Mountain Energy, through its subsidiary Bennett Resources, to drill 20 gas wells for its Valhalla project west of Fitzroy Crossing, near a creek that flows into the national heritage-listed Fitzroy River.

We are aware that the WA Environmental Protection Authority has recommended approval of the development under state laws, but we are also aware that the federal environment department has itself repeatedly, over many months, raised concerns about the standard of the company's environmental assessments.

As you would be aware, last year federal officials advised Black Mountain Energy on multiple occasions that it had not done enough work to identify the region's surface water and groundwater resources or "characterise" ecosystems in the area that relied on groundwater for survival. Nor had they consulted with additional traditional owner groups with cultural and spiritual connections to the Fitzroy River.

Officials wrote that these failures prevented them from being able to fully assess the impacts that fracking could have on the region's environment and vulnerable species, including the critically endangered northern blue-tongued skink and the endangered large-tooth sawfish, which has an important nursery area in the Fitzroy River.

The department wrote that, despite Black Mountain arguing there would be no impact on the Fitzroy River, there was "insufficient evidence" that this was the case. Officials said the company therefore needed to "demonstrate assessment of all impact pathways associated with the Rainbow Serpent Tradition Values".

DCAN members have read the Independent Expert Scientific Committee report¹ into the proposed project, released in December last year. We are frankly amazed that, in the words of the IESC, Black Mountain's "limited and disjointed assessment" with its "largely unsupported" conclusions regarding the project's

¹ <https://www.iesc.gov.au/sites/default/files/2025-12/iesc-advice-valhalla-gas-exploration-appraisal-project.pdf>

potential impacts to surface water and groundwater resources, and related groundwater dependent ecosystems, was not enough for the WA EPA to demand more data, in order to properly assess the proposal. Clearly it should not have been approved.

Fortunately, as the IESC advises, the EPBC Act water trigger gives the federal government the right to insist on these data being provided, and, significantly, the right to reject the proposal.

The clear failures of the Black Mountain application should be enough to ensure that the proposal is rejected by the federal government. There are, however, additional reasons to reject this proposal.

Documented risks of this project to endangered species and the overall Kimberley environment

- Toxic fracking wastewater spills from storage tanks and overflowing waste ponds (from extreme rain events) and general chemical spills creating a high risk of polluting ground and river/creek/flood waters.
- Use of billions of litres of clean groundwater, creating risks to the Martuwarra-Fitzroy River and the ecosystem it supports.
- Black Mountain relied on modelling to claim it will not alter the freshwater hydrology of the area. But without local data, groundwater depletion cannot be ruled out, which would impact the critically endangered Northern Blue-tongue Skink as well as the broader ecosystem. The freshwater Sawfish is at serious risk of extinction, and the Martuwarra-Fitzroy River is one of five “irreplaceable rivers” that are critical to its survival. Contamination and drawdown of an important tributary like Mount Hardman Creek could push it closer to the brink.
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- If approved, this project would most certainly lead to an expansion of fracking in the Kimberley and be the start of industrialising the region with access roads, pipeline easements and well pads, which would fragment this amazing and healthy landscape and create easier access for predators like foxes and cats who kill small mammals like Bilbies.

Gas contributes significantly to global warming

There is a lie being promoted by fossil fuel lobbyists that gas makes a useful ‘transition’ fossil fuel. But as a former Australian chief scientist wrote in 2020, “Gas is not a transition fuel to a safe climate. That ship has sailed.”²

Methane, the main component of “gas”, is itself a very powerful greenhouse gas, responsible for around 30 per cent of current post-industrial era warming.

The CSIRO states, ‘Clearly, current upward trends in methane emissions are incompatible with meeting the goals of the Paris climate agreement. But methane’s short lifetime in the atmosphere means any action taken today would bring results in just nine years. That provides a huge opportunity for rapid

²https://www.researchgate.net/publication/371925287_Gas_is_not_a_transition_fuel_to_a_safe_climate_That_ship_has_sailed

climate change mitigation. In Australia, methane emissions from fossil fuels are rising due to expansion of the natural gas industry, while agriculture emissions are falling'.³ This is a very significant statement and should not be lightly disregarded. It is also significant that agriculture is genuinely essential but is managing to decrease its emissions while gas is, outside vested interest groups, largely regarded as inessential/replaceable, and definitely obsolete in the foreseeable future.

Other sections of the business community are also recognizing the need to move away from the gas industry. Suncorp, one of Australia's largest insurers, in 2025 stopped underwriting, financing or directly investing in new oil and gas exploration and extraction.⁴ It recognizes that climate change is having an impact on its profits through the huge payouts following fire, flood and hail damage. Inevitably gas projects will become uninsurable as the result of existential, financial and possibly also legal risks. There is no reason to think that the Black Mountain project will be an exception.

New gas fields development is being discouraged by the International Energy Agency

The IEA was created in 1974 to help co-ordinate a collective response to major disruptions in the supply of oil. While oil security remains a key aspect of their work, the IEA has evolved and expanded significantly since its foundation. It sees itself as, "Taking an all-fuels, all-technology approach" and "recommends policies that enhance the reliability, affordability and sustainability of energy".

In a May 17th 2021 announcement the IEA wrote:

"The IEA's pathway to (a) brighter future brings a historic surge in clean energy investment that creates millions of new jobs and lifts global economic growth. Moving the world onto that pathway requires strong and credible policy actions from governments, underpinned by much greater international cooperation."

"The contraction of oil and natural gas production will have far-reaching implications for all the countries and companies that produce these fuels. No new oil and natural gas fields are needed in the net zero pathway".

In conclusion

The proponent has wholly failed to provide required and reliable information to allow an informed decision that the project could proceed in compliance with the objects and requirements of the EPBC Act.

DCAN calls on the Minister for the Environment, Senator Murray Watt, to show the strong and credible policy choices that the IEA urges and use his Ministerial powers to reject the 'Valhalla' fracking proposal.

³ <https://www.csiro.au/en/news/all/articles/2020/july/emissions-of-methane-are-rising>

⁴ <https://www.insurancebusinessmag.com/au/news/environmental/suncorp-on-decision-to-end-support-for-gas-and-oil-sector-232315.aspx>

In the 2018 words of Professor Hans Schellnhuber, Founding Director (1992-2018) of the Potsdam Institute for Climate Impact Research, "Climate change is now reaching the end-game, where very soon humanity must choose between taking unprecedented action or accepting that it has been left too late and bear the consequences". Eight years later, we are even closer to the moment when we lose control. We must choose action, not acquiesce to projects that we know are both unnecessary and dangerous.

In May 2021 in Australia, Federal Court Justice Mordecai Bromberg wrote that the anticipated climate-related devastation will "largely be inflicted by the inaction of this generation of adults, in what might be described as the greatest injustice ever inflicted by one generation of humans upon the next."

Please choose wisely, for all of us, future generations and our unique environment.

Yours sincerely.

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