



Submission Writing Guide – Middle Arm Sustainable Development Precinct Referral

[Make your submission here by the 10th of June](#)

Summary

The NTEPA is calling for public engagement with the proposal for a Middle Arm Sustainable Development Precinct (MASDP). At the Environment Centre NT (ECNT) we are concerned about this proposal.

What is being proposed is an intensified industrialisation of Darwin Harbour over many decades with the introduction of multiple, high-risk industries. We believe that the environmental, social, cultural, and recreational values of Darwin Harbour are seriously threatened by this proposal and that the public should be fully informed about the potential impacts. We know that the residents of Darwin and Palmerston love Darwin Harbour and want to see it remain safe and healthy for the decades to come, and that any development needs to be compatible with the long-term sustainability of the Harbour.

What is the MASDP project?

The **proponent** of the project is the Northern Territory Government.

The MASDP proposal involves the development of approximately 1,500 ha of land on Middle Arm Peninsula, over a period of 50 years, including development and maintenance of land and marine infrastructure. The Precinct would contain petrochemicals, renewable hydrogen, carbon capture and storage, and minerals processing industries. The MASDP would be located within 3kms from the City of Palmerston.

Currently, the Santos-owned Darwin LNG facility is located at Middle Arm and processes gas from the Bayu-Undan gas field, and the INPEX-owned Ichthys LNG facility processes gas from the Browse Basin. The Bayu-Undan gas field will be depleted by the end of 2022 and as a result Santos is trying to open the Barossa gas field to back-fill Darwin LNG. Gas is piped from these offshore gas fields into Middle Arm for processing and is then exported as LNG. Gas will also be used as a feedstock for the other proposed industries at Middle Arm, like petrochemicals.

A particularly concerning aspect of the proposal is the petrochemical hub. The four petrochemicals that are named by the proponent are ammonia, ethylene, urea, and methanol, and they would be produced using gas either from the offshore Barossa field or fracked Beetaloo gas as a feedstock.

What are the problems with the project?

Petrochemicals threaten human health

In the proponent's own documents, they have identified that *"significant adverse impacts to human health may occur from dredging, major hazardous facilities, operations and shipping"*. The development of a petrochemical hub poses the most serious risks to human health, in terms of

pollution and air quality. More studies are needed to fully investigate the link, but there is evidence to indicate that “human exposure to certain carcinogenic pollutants emitted from petrochemical industries might increase the incidence of some cancers and cancer mortality”.¹ In the few places around the world where petrochemical development is situated close to residential areas, as is proposed at MASDP, those places have been dubbed “cancer alley” and have been met with enormous community opposition due to concern around health impacts.²

Petrochemical hubs pose a serious risk of explosions, with numerous deadly explosions having occurred in high-regulation jurisdictions just this year. This is a workplace safety issue as well as a threat to the broader public given the proximity of the proposed plant to residential areas. No one wants a petrochemical plant on their back doorstep.

More information about petrochemicals is available [here](#).

The project will lead to an increase in emissions, risking the climate

The expansion of the onshore and offshore gas industries in the Territory will drastically increase greenhouse gas emissions, undermining the NT’s emissions reductions targets and increasing the risk of catastrophic climate change. The MASDP proposal facilitates this gas industry expansion in multiple ways, including through the greenwashing of carbon capture and storage (CCS), increasing demand for gas through use as a feedstock for petrochemicals, and expanding gas processing.

CCS is not a proven or effective technology for reducing emissions. Indeed, CCS is being used by Santos to “rationalise – and subsidise – continued investment in fossil fuel infrastructure that would lock in emissions of CO₂ and other pollutants for decades to come.”³ The Climate Council has said that CCS is a “licence to ramp up emissions”.⁴ The Australasian Centre for Corporate Responsibility states that “the rate of CCS project failure is striking: a recent study of all CCS developments in the United States of America (home to a significant majority of the world’s CCS capacity) found that more than 80% had ended in failure.”⁵

Massive amounts of public funding are subsidising the expansion of the polluting gas industry

Significant amounts of public funding have been committed to this proposal, from the Territory and Commonwealth governments, and supported by both the Territory and Commonwealth opposition. Barnaby Joyce announced \$1.5 billion for Middle Arm, including \$300m for hydrogen and CCS infrastructure in Darwin Harbour and \$200m for common user infrastructure at Middle Arm (in Energy Security and Regional Development Plan). \$100m would go directly to Santos for CCS—despite Santos having made a profit of almost a billion dollars last year.

There will be significant and detrimental impacts to Darwin Harbour

The proponent’s own [Statement of Reasons for a Strategic Assessment](#) have identified the following potential areas of significant impact:

Terrestrial environmental quality	Soil quality may be significantly impacted through land clearing over the term of the Program; erosion; leaks and
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¹ <https://pubmed.ncbi.nlm.nih.gov/32283337/>

² <https://www.theguardian.com/us-news/2021/aug/18/louisiana-plastics-plant-toxic-emissions-cancer-alley>

³ <https://www.ciel.org/reports/carbon-capture-is-not-a-climate-solution/>

⁴ <https://www.climatecouncil.org.au/resources/what-is-carbon-capture-and-storage/>

⁵ https://www.accr.org.au/downloads/accr-ccs-erf-method-submission_july-2021.pdf

	spills of hazardous materials and/or disturbance of contaminated soils
Terrestrial ecosystems	Threatened species, and sensitive and significant vegetation, will be impacted by vegetation clearing.
Hydrological processes	Direct disturbance from land clearing and operations will result in alteration of surface water and ground water and may impact freshwater discharge into the Darwin Harbour
Inland water environmental quality	Direct disturbance from land clearing, construction and operations may result in impacts of groundwater quality.
Coastal processes	Changes to physiology of Darwin Harbour seabed from dredging, marine infrastructure construction and shipping operations may result in impacts to hydrodynamics and indirect impacts to water quality and sediment deposition.
Marine environmental quality	Significant impacts to marine water and sediment quality in Darwin Harbour may occur due to dredging and shipping.
Marine ecosystems	Significant impacts to marine ecosystems and threatened species may occur due to disturbance of habitat during dredging, marine infrastructure construction and shipping.
Air quality	There is the potential for significant impact to air quality through industries establishing in the precinct and shipping.
Atmospheric processes	Significant impact to achieving NT greenhouse gas emissions targets may occur due to land clearing, dredging construction, operations, and shipping.
Community and economy	The activities proposed under the Program has the potential to significantly impact communities, including Aboriginal Peoples communities both adversely and beneficially.
Culture and heritage	Sacred sites and cultural and heritage sites may be impacted during dredging, land clearing, shipping and operations

What is the approvals process?

Usually, when the NTEPA seeks public feedback at the first stage of a proposal for a project, they are looking to determine what level of assessment is required based on how significant the impacts will be. However, the process for the MASDP is different. The MASDP is undergoing what is called a **Strategic Environmental Assessment**. This means that what is being assessed is not individual projects but an overall “policy, plan, and program” for an area. According to the EPA, the strategic environmental assessment process:

was developed as a way to address challenges associated with applying project-level assessments at the landscape scale. SEA recognises that assessments of individual projects are typically unable to sufficiently address the broader issues of cumulative impacts, regional impacts to environmental values and threatening processes. Assessing policies, plans and programs means that environmental and social matters are taken into consideration more proactively and holistically than when assessing individual development proposals. SEA also allows policies and plans to better guide project assessments around environmental outcomes.

A concern that the Environment Centre NT has about the Strategic Environmental Assessment process is that it **reduces transparency and accountability for individual projects**. Once the overall envelope of projects is given approval by the NTEPA, then individual projects within this strategic

area will only need to apply for licenses, approvals for which can be given in just sixty days; **they won't have to go through separate environmental impact assessments**. This means the public has less ability to scrutinise the individual companies, industries, and specific proposals for development at Middle Arm.

The proponent has already initiated an **Environmental Impact Statement (EIS)** and the documents currently before the public for consultation are the **terms of reference** for this EIS. This means that we can expect another round of consultation during which the public will be able to read the full EIS of the project, which is expected in March 2023.

What should I include in my submission?

The most important thing to convey in your submission is your concern about possible negative impacts of the project and your interest in seeing the environmental, cultural, social, and recreational values of Darwin Harbour protected.

This is the first opportunity the public has to engage with the MASDP proposal. You can discuss any of the impacts listed above that concern you. It is powerful to discuss the issues that are relevant to you through your recreational, professional, or cultural connection to Darwin Harbour.

The Northern Territory Government **avoid using the word 'petrochemical' in any public statements made about the MASDP**. It is only in the proposal documents before the NTEPA that we see the word 'petrochemical' used, because they are legally required to disclose the details of the proposal. We need to demand transparency and accountability and ensure that the public are fully informed about the toxic petrochemical plans for Darwin Harbour, including the specific projects, industries, and companies.

How do I make a submission?

Submissions close on the 10th of June, and can be made at the NTEPA website here: [Make your submission here by the 10th of June](#)

Ensure you also email the submission eia.ntepa@nt.gov.au and CC the Environment Centre NT at admin@ecnt.org

Is there anyone I can ask for help about writing the submission?

Our energy campaigner Jason Fowler can answer any detailed or technical questions you have about the project. Jason.fowler@ecnt.org