QUEENSLAND CONSERVATION COUNCIL

PROTECT CONSERVE SUSTAIN

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20 June 2025

RE: QCC Comments on the Gas Supply Security Project Draft Public Environmental Report (EPBC 2020/8856)

Queensland Conservation Council Inc. (QCC) welcomes the opportunity to comment on Australia Pacific LNG Pty Limited's Gas Supply Security Project Draft Public Environmental Report (EPBC 2020/8856).

QCC is the peak body for environmental groups in Queensland. Since 1969, we have worked to support communities in protecting their environment and climate. Today we represent 61 groups and more than 20,000 members across the state, of which many are already experiencing the impacts of climate change and unsustainable development on their communities, threatened species, and landscapes.

QCC urges the Department not to approve the project due to unacceptable impacts on Matters of National Environmental significance and groundwater. At the very least, the proponent must be required to address substantial deficiencies in the Public Environment Report around impacts on groundwater and surface water resources and climate**.** Our concerns are detailed further below.

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1. Misleading and incomplete information

The Public Environment Report (PER) contains major omissions and contradictions that render it unfit for decision under the EPBC Act. This includes:

- Discrepancies in the number of wells assessed and facilities proposed. The proponent is seeking to drill up to 4,435 wells and 8 new gas processing facilities, yet the greenhouse emissions assessment is based on the drilling and operating of 916 wells and one facility[1], while the economic assessment is based on 805 wells (161 per year for five years)[2]. This must be clarified before a decision can be made.
- Greenhouse gas reporting is not consistent with recent legislative changes, for example, the requirement for Queensland projects to complete a Greenhouse Gas Assessment, because it does not break down annual emissions. include any assessment of downstream (Scope 3) emissions, or outline any proposed actions to reduce emissions. It also omits known high-emissions sources such as flaring, wastewater ponds, and fugitive methane leaks, despite fugitive methane from oil and gas contributing 2.6 megatonnes of CO2 equivalent in 2022, or more than 2 percent of Queensland's emissions[3]. There are three Safeguard Mechanism facilities related to this project which will have to reduce emissions in line with national targets over the next 36 years, should approval be granted, but no actions are given as to how this will be achieved. Any reference to emissions reductions are based on defunct and discredited climate change policies and targets.
- The proponent has used groundwater modelling from 2020 which suffers from severe limitations, particularly in the northern part of the Surat Basin where this development is concentrated. Queensland's Office of Groundwater Impact Assessment (OGIA) updated their cumulative groundwater model in 2021[4], and the Independent Expert Scientific Committee (IESC) advised the proponent to conduct local modelling for each

[1] https://aplng.com.au/wp-content/uploads/2025/05/DRAFT-PER-Appendix-J-GHG-Inventory_Rev-0_FINAL.pdf
[2] https://aplng.com.au/wp-content/uploads/2025/05/DRAFT-PER-Appendix-L-Economic-Assessment_Rev-2_FINAL.pdf
[3] https://www.qld.gov.au/environment/climate/climate-change/climate-science,-analytics-and-reporting/emissions-data
[4] https://www.dlgwv.qld.gov.au/__data/assets/pdf_file/0003/1591725/modelling-groundwater-impacts-surat.pdf

development area four years ago[5]. The proponent has not complied with either of these and continues to use out of date groundwater modelling.

- Indicative estimates of habitat clearing for threatened wildlife and ecosystems have been used, without site-specific, ground-truthed assessment of harm in the areas that will actually be cleared.

Given the lack of transparency and out-dated modelling in the referral documentation, QCC challenges the information they have provided is insufficient to make a defensible decision under the EPBC Act. The Minister should reject the referral on this basis alone, or require a full and credible reassessment of the PER before proceeding.

2. Greenhouse gas emissions and climate impact

The Greenhouse Gas Emissions Inventory supplied with the PER estimates a total scope 1 emissions production of 3.7 megatonnes CO2e, based on 916 wells, and between 0.58 - 3.26 megatonnes CO2e scope 2 emissions depending on grid decarbonisation.

If the project actually drills 4,435 wells, the Scope 1 and 2 emissions could be 20.7 - 33.7 megatonnes CO2e, assuming a constant carbon intensity per well.

The PER seems extremely low, given that it would equate to an average emissions over the years 2025 - 2061 of 102,000 tonnes CO2e scope 1 emissions. Origin's reported upstream Scope 1 emissions in the Safeguard Mechanism data for 2023-24 totalled 572,211 tonnes carbon dioxide equivalent (CO2e).

The APLNG project's reported emissions are wildly different from the original 2010 EIS. In 2010, the proponent estimated that "In 2023, the Project's gas fields will produce a forecast maximum of 633PJpa, with projected scope 1 GHG emissions totalling 3.3Mt CO2-e/yr"[6]. While in 2024, APLNG did produce 700PJ of gas, the scope 1 emissions for the upstream gas

[5] https://www.iesc.gov.au/sites/default/files/2022-07/iesc-advice-gas-supply-security-2021-129.pdf
[6] https://aplng.com.au/eis/

fields were 0.57 megatonnes CO2e as reported to the Safeguard Mechanism. This raises serious concerns about the validity of the reporting, with methane cameras showing that coal seam gas pipelines and wells may be gassier than reported[7].

Australia is planning to reach net zero by 2050. We cannot afford this uncertainty in emissions projections to continue to 2061. This project will also enable the LNG terminal to operate until 2061. The International Energy Agency's latest World Energy Report identifies a significant oversupply of natural gas under construction under stated international policies[8]. This is a stranded asset risk for Queensland, as well as a carbon risk. An additional fifteen years of operation, beyond the originally anticipated 30 year lifespan for the APLNG terminal, from 2015 - 2045, would add an additional 429 million tonnes CO2e to the global atmosphere, locking in climate chaos beyond the net zero target date.

There is no justification for extending operations fifteen years beyond the original project scope to 2061, and locking in decades of new pollution as global gas demand is forecast to decline. Australia must prepare for its transition away from gas prior to that time, reducing demand and ensuring AP LNG does not enter into unsustainable and damaging new LNG contracts.

This scale of climate pollution is at odds with Queensland and Australia's climate change commitments under Paris. The 2023 update of the IEA's Net Zero Roadmap is clear that we need to stop approving new gas fields to meet the Paris Agreement[9].

The impact of this project on the Great Barrier Reef and other matters of national environmental significance at risk from 1.5 degrees of global warming must be assessed and considered.

3. Risks to water resources and aquatic ecosystems

The project crosses alluvial lands and steep escarpments, and poses unacceptable risk to the roughly 211,000 hectares of country it covers across two river basins (the Fitzroy in the North,

[7] https://www.acf.org.au/news/methane-camera-reveals-widespread-potent-gas-leaks
[8] https://www.iea.org/reports/world-energy-outlook-2024/executive-summary#abstract
[9] https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-0c-goal-in-reach

and Condamine in the south). The proponent proposes to extract 72 billion litres of groundwater, including in sensitive areas feeding the Dawson and Condamine Rivers. 21 groundwater-fed springs, including those connected to the Great Artesian Basin, are expected to lose water due to the project.

As mentioned, the proponent's modelling fails to incorporate the most recent cumulative groundwater modelling from Office for Groundwater Impact Assessment and ignores specific Independent Expert Scientific Committee (IESC) recommendations. The IESC warned the cumulative impacts from the project ran a "high risk of exceeding an ecological 'tipping point' for one or more threshold ecohydrological requirements" of ecosystems that depend on groundwater for their survival, calling for site-specific local-scale modelling instead[10]. The proponent calls this advice "unreasonable" and claims the impacts on water users, springs, and rivers are "not significant" because the springs are already beyond threshold drawdown limits.

This project risks irreversible damage to water systems and sets a dangerous precedent for ignoring expert advice, the precautionary principle, and regulatory requirements.

4. Destruction of critical habitat for threatened species

The project has a combined development footprint of 16,670 hectares - three times the size of the largest coal mine in Australia. This includes extensive areas of habitat for endangered and vulnerable wildlife.

Modelled clearing includes over 1,300 hectares of Koala habitat, 923 hectares for Greater Glider, and over 1,000 hectares each for multiple threatened reptiles (e.g. Collared Delma, Dunmall's Snake, Yakka Skink).

[10] https://www.iesc.gov.au/sites/default/files/2022-07/iesc-advice-gas-supply-security-2021-129.pdf

However, this assessment is entirely inadequate and based on regional modelling rather than site-specific surveys. The extent and location of habitat clearing is not specified, and the presence or use of habitat by listed species has not been confirmed.

The project would significantly fragment habitat, clearing hundreds of small areas for well sites. This is particularly devastating for small and sedentary species and reptiles. The cumulative impact from the existing and proposed gasfields has not been properly considered.

The failure to ground-truth biodiversity values or assess ecological function contravenes EPBC Act requirements for rigorous and precautionary assessment of listed species and communities.

Recommendation

The Gas Supply Security Project represents a major expansion of Australia's gas industry at a time when science and international policy demand the opposite. QCC urges the Minister to refuse the application in light of its unacceptable climate, ecological, and water impacts.

At the very least, the proponent must be required to withdraw this PER and resubmit the application with full and credible EIS to assess groundwater, climate and threatened species impacts.

Yours sincerely,

Dave Copeman

Director, Queensland Conservation Council