

2 August 2019

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Environment Assessment Branch  
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Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd  
Reference Number: 2019/8484

Dear Referrals Gateway staff,

The Australia Institute welcomes the opportunity to make a submission on the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484). The Pipeline Project should be considered a controlled action under the EPBC Act as it would impact on matters of national environmental significance (MNES).

Most importantly the Pipeline would facilitate the development of coal seam gas projects in the Galilee Basin and the water resource impacts that accompany such development, which is a MNES under the 2013 Water Trigger amendment. These developments in turn are likely to have an impact on other MNES such as nationally threatened species.

While perhaps not required under the EPBC Act, a full environmental impact statement would also allow consideration of the economic impacts of the pipeline project. The development of export LNG terminals at Gladstone has led to increased gas prices in the Australian east coast market, which in turn has increased costs for electricity generation and manufacturing industries. These impacts have been detrimental to the welfare of the Australian community, demonstrating the importance of thorough assessment of energy infrastructure.

Assessment of this project should also consider the potential consequences of locking in carbon emissions from unconventional gas development. While currently not considered a MNES, Australia has an obligation to reduce carbon emissions under the Paris Agreement. Recent increases in Australia's emissions are due largely to gas development.<sup>1</sup> Building new infrastructure that requires ongoing expansion of gas extraction is likely to continue this trend.

Government and gas industry claims that Australian gas exports displace coal generation in importing countries, resulting in lower overall emissions, are not supported by data. For example, the International Energy Agency finds that coal to gas switching contributes just 8% of emissions reductions to their sustainable development scenario. Even this small contribution takes place mainly in the United States, which is unaffected by Australian gas

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<sup>1</sup> Saddler (2018) National Energy and Emissions Audit, September 2018, <http://www.tai.org.au/sites/default/files/NEEA%20electricity%20update%20-%20October%20%5BWeb%5D.pdf>; Swann (2018) Gorgon-tuan Problem, <http://www.tai.org.au/sites/default/files/P635%20Gorgon-tuan%20Problem%20%5BWeb%5D.pdf>



exports. It is renewable energy and efficiency which do the “heavy lifting” according to the IEA.<sup>2</sup>

The Galilee Gas Pipeline Project appears certain to impact on several matters of national environmental significance under the EPBC Act and could have impacts on many other matters of national significance beyond that act. The project should be subject to full environmental impact assessment as a controlled action under the EPBC Act.

We are happy to provide further detail if required.

Regards,

A handwritten signature in blue ink, appearing to read 'Rod Campbell', is centered on the page. The signature is fluid and cursive, with a large loop at the end.

Rod Campbell  
Research Director  
The Australia Institute

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<sup>2</sup> IEA (2019) The role of gas in today’s energy transitions, <https://www.iea.org/publications/roleofgas/>