

HON. ROBIN CHAPPLE MLC

EPA Services
Department of Water and Environmental Regulation

Via Email: Registrar@dwer.wa.gov.au

Dear Registrar

RE: REFERRAL OF COOGEE METHANOL PLANT AND PERDAMAN KARRATHA UREA PROJECT TO EPA UNDER SECTION 38 OF ENVIRONMENTAL PROTECTION ACT 1986

As the Member for the Mining and Pastoral Region and an extremely concerned member of the community, I wish to refer two separate proposals both seeking to locate on the Burrup Peninsula, which is known as Murujuga to the Environmental Protection Authority (EPA) under Section 38 (S38) of the *Environmental Protection Act 1986* (EP Act 1986):

- Coogee Methanol Plant
- Perdaman Karratha Urea Project

This referral is not confidential.

I refer to Ministerial Briefing Note: Burrup Peninsula Issues, April 2018, (MLN D16700) (File Number: J0817/201701), which states that the Department of Jobs, Tourism, Science and Innovation is 'actively working with two projects, led by Coogee and Perdaman respectively, seeking to locate on the Burrup Peninsula'.

Coogee Methanol Plant

The proponents for the Coogee Methanol Plant are Coogee Chemicals Pty Ltd, Mitsubishi Corporation and Wesfarmers Ltd who are undertaking a joint feasibility study to develop a US\$1 billion+ methanol and monoethylene glycol petrochemical plant at Site E in the Burrup Strategic Industrial Area (SIA).

It is my understanding that Coogee was planning to commence gas negotiations with both Woodside and Chevron in May 2018 but were informed in April 2018 that was not possible. This is of extreme concern since the project has not undertaken the environmental impact assessment.

The proposed development would require at least 75 ha of land and consume up to 125TJ/d of natural gas, the use of the bulk liquids jetty, seawater pipelines and infrastructure services corridors.

It should be noted that the Coogee Methanol Plant proposes to be located on site E, which is within the known explosive buffer zone of the Yara Pilbara Nitrates TAN plant.

Perdaman Karratha Urea Project

The proponents for the Perdaman Karratha Urea Project are Perdaman Chemicals and Fertilisers Pty Ltd who have requested land under the Burrup SIA to progress feasibility studies for its proposed US\$3.3 billion+ project.

The Department has provided key land, port and other infrastructure information to Perdaman to inform site selection, and in March 2018 Perdaman began negotiations with a gas supplier. This is concerning since the project has not undertaken the environmental impact assessment.

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Murujuga (Burrup Peninsula)

Two important issues about the Burrup are acknowledged by the government and highlighted in the background information of the Briefing Note. That the Burrup is already a host to industrial infrastructure, and it is a place of 'cultural and archaeological significance as the densest concentration of rock engravings anywhere in the world with more than one million Aboriginal rock art images (petroglyphs). The petroglyphs document human presence in an area over an estimated 45 000 year timespan, the longest continuous production of rock art in the world.'

The Murujuga Aboriginal Council (MAC) is the incorporated body corporate representing the Traditional Owners (TOs) that were party to the *Burrup and Maitland Industrial Estates Agreement* (BIMEA). It is unclear if MAC have been consulted on either of these proposals.

Emissions

The issue here is that the emissions from industry affect the rock art through a very complicated process. Part of what it does is affect the patina on the surface of the rock. Effectively, that undermines the rock art, the carvings and the petroglyphs.

The conditions that were initially set for the Yara Pilbara Nitrates TAN plant to be located on the Burrup were based on a flawed interpretation by the CSIRO. The CSIRO based their interpretation of the impact of the emissions from industry on a study by Cinderby et al on the impact of industry emissions and air pollution on monuments. Even the authors of that study say there is an incorrect use of their work in the interpretation by the Gillett 2008 report—the CSIRO report.

The set of conditions, based on flawed interpretation of data were written to guide the monitoring of the Yara Pilbara Nitrates TAN plant and the conditions that were put on the plant, which has now already been built on the Burrup. Not only that, but the monitoring process that has been undertaken of the previous conditions from the other plants that are on the Burrup has also been found wanting.

Previous data from industry in emissions reporting has been incorrect, as seen in 2003 when Woodside indicated that a technical error led the company to formally under report NOx emissions to the National Pollutant Inventory.

It is imperative to recognise the full extent of the impact of the Yara Pilbara Nitrates plant, particularly its cumulative effect with the existing gas processing plants and fertiliser plants. A study must be done of the cumulative impacts before any other industrial proposal is even considered.

Previous advice from the EPA to the Minister for Environment in 2012 stated that it will continue to have regard to the cumulative impact of air emissions when assessing any further significant development proposals on the Burrup Peninsula.

The evidence is clear that the analysis of rock art monitoring between 2004 and 2014 did not include adequate statistical analysis and that the measurements that were taken were unreliable. The colour of the rock art has changed some 13 per cent over 13 years—a major concern for the preservation of the significant rock art.

World Heritage Listing (WHL) Threatened

I have serious concerns that if the rock art continues to be damaged at the current rate then the possibility of having the Burrup WHL would be threatened. Given that MAC, the overarching TOs of the Burrup

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Peninsula have formally voted in favour of WHL and the process for WHL is lengthy, now is the time to get the site listed.

It is of extreme concern that outlined in the Briefing Note the government is aware that although WHL would have tourism benefits it 'could deter new industrial investment without careful management' and that the 'SIA and associated multi-user infrastructure represents a considerable investment by the government'.

It is my understanding that BHP and Apache both chose to position their projects at Onslow and Devil's Creek respectively and not on the Burrup due to its World Heritage values. The Coogee Methanol Plant project and the Perdaman Karratha Urea Project to be located on the Burrup Peninsula give me great concern, as outlined above, especially when there is an available option at the Maitland Strategic Industrial Area (SIA).

I implore you to send both these projects through the rigorous and transparent EPA process before any further negotiations take place as a matter of extreme urgency. I also request that the EPA, in their assessment, direct the projects to the Maitland SIA, a site the government has already gazetted for heavy industry.

Yours sincerely,



The Hon Robin Chapple MLC
Member for the Mining and Pastoral Region
7 May 2018

CC: Dr Tom Hatton, Chair, Environmental Protection Authority