

SUBMISSION ON THE NT GOVERNMENT'S GREENHOUSE GAS EMISSIONS OFFSETS POLICY AND TECHNICAL GUIDELINES (NORTHERN TERRITORY OFFSETS FRAMEWORK)

15 October 2021

PRELIMINARY

The Aboriginal Medical Services Alliance NT (AMSANT) represents the community-controlled Aboriginal health services in the NT. Our member organisations provide comprehensive primary health care to Aboriginal people in urban and remote locations, and as such we have a direct interest in issues which impact on the health of the populations they serve.

One of the biggest of those issues is the climate emergency highlighted by the 6th Report of the Intergovernmental Panel on Climate Change (IPCC)¹. AMSANT is aware of the dire situation outlined in that report, and of the fact that there is only a very narrow path available if we are to avoid a catastrophic future for everyone. As the NT Government is aware, an essential element of that path is that drastic action must be taken now to reduce Greenhouse Gas (GHG) emissions produced by fossil fuel industries, including gas. That is the context in which we provide these comments.

MAIN ISSUES

1. AMSANT notes that the Policy is set in the context of, and refers specifically to, the NT Government's goal of achieving net zero emissions by 2050. However, the science is clear that achieving this goal will not make a meaningful difference to keeping global warming levels to 1.5 degrees - the maximum amount of warming under which life on the planet, and indeed the NT, can avoid a catastrophic future. A preferable scenario is that GHG emissions must be reduced by 75% by 2030 with zero net emissions before 2035.² Therefore, the context in which the Policy is set is demonstrably inadequate.
2. The Policy is discretionary. The Policy document is replete with such statements as "the NT Government may..." and "the decision-maker may require...". Discretion may be appropriate in a normal situation. But as the 6th Report of the IPCC is at pains to point out, this is not a normal situation: but one where the opportunity to avoid a catastrophic future is at stake. On such an important topic, discretionary policy is clearly inadequate, because it can easily by default lead to no action, and provides no information to the public about what will in fact happen. Further, no information is provided about the criteria which the Minister or decision-maker will use in making his or her decision. Rather than providing clarity, it obfuscates. The Policy should clearly require that emissions cover the life cycle of the project to be offset, rather than being focused on discretionary decision-making using unstated criteria.

¹ IPCC, 2021: Summary for Policymakers. In: *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* (Masson-Delmotte, V., P.Zhai, A, Pirani, S.L. Connors, C. Pean, S.Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Mathews, T.K. Maycock, T. Waterfield, O. Yelekci, R. Yu and B. Zhou (eds.)). Cambridge University Press. Accessed 12/10/2021.

² <https://www.climatecouncil.org.au/resources/nsw-raises-climate-targets-federal-govt-still-missing-in-action/>
Accessed 12/10/2021

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3. The Policy establishes the category of “indirect emissions offsets”, a category not used anywhere in the world and which has no credibility. It is a step toward legitimising unproven or failed technology. Section 8.2 states “Indirect emissions offsets are offsets delivered by contributing funding towards research and development ... (which) could include research that results in new carbon abatement methodologies that apply in the Territory context.” AMSANT notes that Section 8.2.1.1 states that “there must be reasonable confidence that the R&D will achieve the proposed benefits”. We wish to emphasise that carbon capture and storage technology does not fit this condition – it is an unproven, oft-failed, technology, and widely recognised as such.³ The Policy should explicitly recognise this fact.
 4. The Policy is likely to facilitate a dramatic rise in Australia’s GHG emissions at the very time when the world’s best science is warning of the urgent need to lower GHG emissions if global warming is to be contained at anything like reasonable levels. For example, the proposed fracking project in the Beetaloo Basin, which the Policy could facilitate, will cumulatively result in approximately 1.4 billion tonnes of emissions over the first 20 years, equivalent to more than two and a half times Australia’s total annual emissions.⁴

RECOMMENDATIONS

AMSANT recommends that:

1. The Policy be re-written to address the issue of inappropriate discretion being available to Ministers to avoid requiring genuine emissions offsets. It should state definitively what will actually happen. Where decision-making is required it should define the criteria for such decision-making, and include the specific implications for global warming on which those criteria are based.
2. The Policy be re-written to exclude the category of ‘indirect offsets’. This concept has no intellectual credibility, and risks approving ineffectual offsets technologies. It obfuscates rather than clarifies. If it is decided to keep this category in the Policy, it is imperative that carbon capture and storage technology be excluded by name since it does not meet the criterion of “reasonable confidence...that...it will achieve the proposed benefits.”
3. The NT Government commits to the reality that mining of fossil fuels must stop now, as emphasised in the 6th IPCC Report. This is a fundamental matter of good public policy.
4. The NT Government recognises that the current goal of net zero emissions by 2050 is inadequate. It will inevitably result in a catastrophic future for life on the planet, and must be abandoned in favour of an approach supported by the science – that is, net zero emissions well before 2035.

³ <https://www.climatecouncil.org.au/resources/what-is-carbon-capture-and-storage/> and [As carbon capture, storage commitments near \\$4b, what are the options for heavy industry? - ABC News](#) Accessed 12/10/2021.

⁴ RepuTex Energy, *Analysis of Northern Territory gas basin emissions and carbon costs*, October 2021, page 11 (based on a high use scenario in Australia and overseas).