

## Carbon capture and storage – committing to EPA conditions

Recently the Western Australian Environmental Protection Authority (EPA) issued its report to the Minister for Environment pursuant to section 44 of the *Environmental Protection Act 1986* (EP Act) on the proposed expansion of Griffin Power 3 Pty Ltd's (Griffin) Bluewaters coal-powered power station. This report has implications for Western Australian projects which require approval under the EPA Act, specifically with regards to carbon capture and storage.

The EPA has recommended the Griffin power station proposal be approved subject to the imposition of a number of conditions, including that the power station be 'Carbon Capture and Storage (CCS) ready'. Specifically, the EPA has proposed conditions which require:

- (a) setting aside land to accommodate carbon capture plant;
- (b) reporting of progress made towards the implementation of CCS every five years;
- (c) retrofitting of carbon capture and storage within five years of technology becoming economically and technically proven; and
- (d) developing a greenhouse gas abatement report prior to the start of construction.

The EPA has proposed that requirements (c) and (d) apply until the EPA and Minister for Environment determine that they are non-complementary to any Commonwealth greenhouse gas emissions trading scheme in force in Western Australia.

Griffin had submitted that the Bluewaters power station expansion would be CCS ready in accordance with the International Energy Agency (IEA) definition of that term, being:

"A CO<sub>2</sub> capture-ready power plant is a plant which can include CO<sub>2</sub> capture when the necessary regulatory or economic drivers are in place...Developers of capture-ready plants should take responsibility for ensuring that all known factors in their control that would prevent installation and operation of CO<sub>2</sub> capture have been eliminated."

Having regard to the information provided by Griffin, the EPA was not satisfied that the expansion would be CCS ready as per the IEA definition. Whilst Griffin stated that it would make sufficient space on land immediately adjacent to each of the new generation plants available to accommodate carbon capture related plant and equipment, the EPA noted that Griffin had not clearly indicated where the proposed delineated land would be located and had not confirmed that this area of land would be safeguarded against the construction of non-carbon capture related plant and equipment in future.

Griffin had also proposed potential geosequestration sites for the proposal. However, the EPA found that Griffin had not confirmed that these sites could accommodate the CO<sub>2</sub> emissions from the Bluewaters Power Station Phase III and Phase IV generating plants over the anticipated life of the proposal. Also, Griffin had not provided any information regarding the identification of potential transport routes to these sites.

With this report, the EPA has made it clear that until an Australia-wide emissions trading scheme is introduced, the Western Australian government will be taking responsibility for regulating carbon pollution and climate change issues. Notwithstanding the current absence of a national scheme, proponents of carbon-sensitive projects should take the Federal government's proposed policy in relation to climate change into account when seeking environmental approvals for such projects.

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