

Crib Point Gas Import Jetty and Crib Point-Pakenham Gas Pipeline Inquiry and Advisory Committee

Thank you for the opportunity to contribute to the inquiry that this committee is undertaking in accordance with the request by the Minister for Planning to review and report on the environmental effects statement that AGL and APA have prepared regarding their joint proposal at Crib Point.

My position

I wish to express my deep dismay that these companies are considering such an environmental damaging project and ask that this committee give close attention not only to the direct effects of the project but also to its indirect, long term and cumulative effects.

I am also concerned that the most significant impact of this proposal has been ignored and unlikely to be assessed under any relevant approval process. The contribution this project will make to greenhouse emissions and consequently to climate change in the form of so-called Scope 3 emissions falls outside all regulation and legislation that could apply here.

Environmental impacts

Westernport Bay is an environmentally significant but delicately balanced area. Its significance is highlighted in a recent report by Melbourne Water¹:

Western Port is a unique feature on the Victorian coast, a large, semi-enclosed embayment on an exposed coastline, formed by complex geological processes ... Superficially similar to Port Phillip Bay, it is more complex than its western neighbor, with a greater tidal range, extensive intertidal mudflats, and two large islands (Phillip Island and French Island). The tidal flats are cut by deep channels, with several catchments draining (some artificially connected) into the northeastern and eastern parts of the bay. All of this makes for complex oceanographic circulation. Much of its coastline is fringed by mangroves and saltmarshes, and there are extensive seagrass meadows on mudflats and below the low tide level.

According to the Melbourne Water report, it has three of Victoria's 13 Marine National Parks and Westernport and its surrounds have also been recognized internationally by UNESCO as combining outstanding natural values with intense interactions with human populations. Westernport is an important Ramsar Site comprising a large proportion of the bay to the north of Phillip Island. It consists of large shallow intertidal areas, dissected by deeper channels and covers approximately 60,000 hectares.

All this complex beauty and diversity are under threat from this massive project and its many outcomes. The high degree of concern over the project's environmental impacts that has been expressed by many is illustrated by the submission made the

¹ https://www.melbournewater.com.au/sites/default/files/2018-02/Understanding_the_Western_Port_Environment_0.pdf

Mornington Shire Council to this inquiry ². These impacts include damage to the marine ecology and biodiversity, terrestrial ecology, biodiversity and native vegetation and groundwater, including potential impacts on aquifers and groundwater dependent ecosystems. Such damage is likely to be irreversible whereas the loss of an economic opportunity can easily be repaired and replaced.

Ecologically Sustainable Development

The *Ministerial Guidelines for assessment of environmental effects under the Environment Effects Act 1978* indicate that the principles and objectives of Ecologically Sustainable Development (ESD) are significant underpinnings of the EES assessment process. I believe that ESD is no longer an adequate concept for assessing actions for their environmental impact. This is because of the priority it gives to economic growth over environmental outcomes.

Projects such as this at Crib Point are being justified on the grounds that they could assist in the transition away from the use of fossil fuels without causing too much economic disruption. However, many scientists and others have pointed out that this is a very poor strategy for tackling climate change. Natural gas is a rapidly growing and significant source of greenhouse gas emissions. Investment in gas for energy generation would lead to much higher transition costs in the future and the immediate diversion of funds away from renewable sources.

Gaps in the assessment process

The final Scoping Requirements FAQs published on the DEWLP website state that:
*An EES is the most comprehensive and robust assessment process available and will provide for an integrated and transparent examination of the proposed project and its effects, which is necessary because of the array of potential effects, the substantial public interest and the different statutory approvals required for this type of major project.*³

This statement of purpose suggests that an Environmental Effects Statement (EES) provides a effective tool for protecting the environment. I note, however that the Act authorising this process was first passed in 1978 and has not been amended since 2012. As such, it fails to reflect the growing threat of climate change in its definition of the environment or to recognise the obligations set out in the Victorian Climate Change Act 2017.

On first glance, the definition given in *Ministerial Guidelines for assessment of environmental effects under the Environment Effects Act 1978* appear quite comprehensive:

*[The environment] ...includes the physical, biological, heritage, cultural, social, health, safety and economic aspects of human surroundings, including the wider ecological and physical systems within which humans live.*⁴

² <https://www.mornpen.vic.gov.au/About-Us/News-Media-Publications/News-Media/AGL-Crib-Point-gas-project-an-unacceptable-risk>

³ https://www.planning.vic.gov.au/_data/assets/pdf_file/0019/410509/Crib-Point-Scoping-requirements-FAQ.pdf

⁴ https://www.planning.vic.gov.au/_data/assets/pdf_file/0026/95237/DSE097_EES_FA.pdf

An important omission is greenhouse gas emissions generated through the use of the natural gas such as that imported through Crib Point. Such gases are not regulated either at the State or Commonwealth level and are treated differently to other emissions which are treated under State law as pollutants.

Westernport is a significant and irreplaceable component of Victoria's environment. This project threatens the beauty and diversity of this area. I ask that you closely examine the long term impacts of this project and give priority to protecting the natural environment and all its components.

Joy Mettam

25 August 2020