

Crib Point gas import terminal and pipeline project Environment Effects Statement (EES)

Submission by the Victorian National Parks Association

Dear Inquiry and Advisory Committee,

Thank you for the opportunity to comment on the Crib Point gas import terminal and pipeline project Environment Effects Statement (EES).

The Victorian National Parks Association (VNPA) have been a community voice for the protection of Victoria's unique natural heritage for over 67 years. VNPA is an independent, non-profit, membership-based group, which exists to protect Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

We will be commenting on the EES as it relates to:

- **Marine biodiversity**, including potential effects on the ecological character and biodiversity values of the Westernport RAMSAR site
- **Terrestrial biodiversity**
- **Other matters**

The VNPA requests the opportunity to make submissions at the public hearings and lead expert evidence.

The VNPA reserves its right to raise additional matters at the public hearings, given the volume and complexity of material and issues raised by the ESS documents.

Key issues:

The EES has failed to address potentially major concerns on the impact to marine biodiversity. The EES is **not** to the standard that a comprehensive, science based environmental assessment should

be. Our expert team of marine consultants and scientists would like to point out the following concerns, which the EES has failed to address:

- AGL's Gas Import Facility has the potential to cause severe biological and ecological harm over large areas, which may be irreversible.
- In our view, the EES fails to directly address the many impacts on marine biodiversity from the gas import jetty facility as directed in the procedures and requirements made under section 8B(5) of the *Environment Effects Act 1978* and the EES Scoping Requirements.
- The methodology of the marine biodiversity components of the EES was fundamentally flawed and are not considered as scientifically valid.
- The structure and implementation of the EES has no scientific rigour and the information is not considered reliable for environmental decisions and management, being largely opinion-based and without supporting evidence.
- The EES has failed to adequately address the following potentially significant impacts on marine biodiversity including:
 - Failure to address catastrophic incidences and threats - ship collisions, oil spills and potential gas explosions;
 - Specific impacts on the variety of Ramsar natural values and listed waterbirds;
 - The impacts on marine biodiversity from chlorine discharge and release of toxicants are overall, unacceptable;
 - Impacts on listed threatened species and communities under the state's FFG Act, and EPBC Act, and other sensitive marine species and communities.
- Critical biological impact assessments were absent from the EES.

We provide further detail in the following sections of our submission.

MARINE BIODIVERSITY

The following comments are relevant to the following reports:

- Chapter 6: Marine biodiversity
- Technical Report A: Marine biodiversity

1. Chlorine discharges and the release of toxicants

Key issues:

- The impacts on marine biodiversity from chlorine discharge and release of toxicants are inadequately assessed and, overall, unacceptable.
- The FSRU operation proposes to use chlorine dosing to prevent biofouling within heater exchange units. Chlorine compounds in seawater can result in the production of hundreds of different types of chemicals - many known as carcinogens, mutagens.
- These chemicals raise the potential contamination as a threat of major concern for Westernport Bay, and are not considered properly in the EES.
- The EES concluded there were low environmental risks, but the conclusions are not supported by valid science and evidence.
- Contaminants that have the potential to cause long-term, irreversible and ecosystem-wide impacts on significant species, communities and ecosystems are not addressed.

a. Chlorine guidelines exceeded for the marine environment

The FSRU operation proposes to use chlorine dosing to prevent biofouling within heater exchange units. Chlorine compounds in seawater can result in the production of hundreds of different types of chemicals - many known as carcinogens and mutagens with long-term toxicity.

CSIRO recommends the guideline value for chlorine release to protect 99% of species for marine waters (as stated in the EES *Technical report A: Marine biodiversity*, page 263) as:

“Where the concentration is intermittent or variable over time, such as the tidally varying conditions in the North Arm of Western Port, the recommended short-term Guideline Value is 6.0 µg/L for 99% species protection.”

What is concerning is these guidelines for chlorine will be exceeded dramatically (94 µg/L over the recommended limit), as stated in *Chapter 6* of the EES:

“The worst-exposed biota would be exposed to chlorine concentrations of zero up to 100 µg/L and down to 10 µg/L in five minutes.”

Adding to our concern is the presence of LNG carriers next to the FSRU, which creates the effect of ‘pooling’:

“The obstruction of the discharge ports by the adjacent LNG carrier reduces dilution in the tidal currents and causes more accumulation of partly diluted discharge under the two vessels”.

b. Potential contamination of Westernport Bay

The FSRU operation proposes to use chlorine dosing to prevent biofouling within heater exchange units. Chlorine compounds in seawater can result in the production of hundreds of different types of chemicals - many known as carcinogens, mutagens.

We have concern for how the suite of chemicals can cause considerable toxic effects and impacts over considerable distances, on the ecosystem of Westernport Bay.

Other studies have shown that considerable concentrations of chemicals have been detected in sediments and benthic fishes, indicating dispersal into bay-wide environments and ecosystems, yet the EES claims it will not be an issue.

These chemicals raise potential contamination as a threat of major concern for Westernport Bay and are not considered properly in the EES.

c. Impacts of chlorine discharge on environmentally sensitive areas and marine species

The EES comments on the minimal impact or dismisses impact entirely that chlorine discharge will have on ecologically significant areas, waterbirds and marine biodiversity with the following statements in *Chapter 6*:

“Under all modelled operating scenarios, chlorine concentrations over 6 µg/L are confined to the dredged port basin within the operating Port of Hastings and are not predicted to extend to the more ecologically significant areas of Western Port including seagrass beds and intertidal mudflats.”

“Only organisms sensitive to a low level and short duration of exposure to chlorine would be affected during the passage through the FSRU or in the plume around the discharge ports – others would survive this short-term event.”

“In summary, in the worst-case scenario, the area of potential impact for residual chlorine and seawater temperature change extends over 20 hectares around the proposed FSRU location. Mangroves, saltmarsh, seagrasses, subtidal reefs and waterbirds (including wading birds) would not be impacted by the seawater discharge associated with the seawater usage of the FSRU.”

There is no evidence to back up these statements, nor is there consideration for the range of environmental factors that can influence this. Furthermore, the EES fails to even identify significant marine species and communities within the project area.

Due to the absence of thorough ecosystem approach to the impact assessment, this raises the question as to the impacts from the use of chlorine and associated toxicants, and the potential impacts up the food chain.

Given the above, it is our view that the EES fails to directly address the impacts of chlorine discharges and other toxicants on marine biodiversity from the gas import jetty facility as directed in the procedures and requirements made under section 8B(5) of the EE Act and the EES Scoping Requirements, as stated on page 21. This impact is therefore inadequately assessed and, overall, unacceptable.

2. Marine pest invasions

Key issues:

- Marine pest invasions have the potential to be catastrophic marine incidents, an issue the EES fails to adequately address.
- The EES fails to properly account for the increased risk of marine pest invasions due to the 25-40% increase in shipping activity (additional 40 ships per year) that would result from the project.

- Marine pest invasions can permanently alter ecosystems – such as Japanese Kelp or Northern Pacific Sea Stars, which have devastated swathes of habitat types in Port Phillip Bay already – this potential impact is not adequately assessed by the EES.

It is well established that the risk of marine pests being introduced has increased due to a rise in international and domestic maritime vessel traffic¹. AGL's gas import facility will exacerbate this existing risk by increasing shipping in the area by up to 40 ships per year. This is an increase of up to 25-40% each year, a substantial and elevated risk to Westernport Bay.

Marine pests can devastate marine ecosystems and can be catastrophic events. The seriousness with which they should be treated was not acknowledged in the EES, considering the significant impacts on maritime industries, the marine environment and the community.¹

It is in the national interest to protect the marine environment from this threat of introduction, establishment and spread of marine pests, as once established, marine pests can rarely be eradicated and their negative effects are long lasting. It is critical to prevent the introduction and spread of marine pests to ensure that potentially significant consequences for Australia's marine environment and industries are minimised.¹

We consider that the potentially catastrophic impacts that marine pest invasions could have on Westernport Bay is severely underestimated. The EES does not adequately address the additional risk for what could be a 25-40% increase in shipping – the prime way marine pest invasions occur.

Given the above, it is our view that the EES fails to directly address the impacts of marine pest invasions from the gas import jetty facility and associated operations, as directed in the procedures and requirements made under section 8B(5) of the EE Act and the EES Scoping Requirements, as outlined for pests on page 15.

3. Matters of national environmental significance – general comments

Key issue:

- The EES fails to address the impacts on matters of national environmental significance.

¹ MarinePestPlan 2018–2023. National Strategic Plan for Marine Pest Biosecurity. Australian Government.

The existing conditions sections in *Technical Report A* of the EES describes the listed species, communities and wetland sites, without any attempt to predict the biological impacts or to properly apply this to the risk assessment.

The risk assessment is also presented before the impact assessment, which presents problems in the validity of the risk assessments in the first instance.

There is no acknowledgement of the gaps in knowledge, and the EES uses speculation to cover up these knowledge gaps.

Minimizing or disregarding conservation issues is not consistent with best practice and the application of the precautionary principle, which underpins legislation such as the *Marine and Coastal Act 2018*, in which it is a:

“...guiding principle for the management of the marine and coastal environment that if there are threats of serious or irreversible environmental and other damage, lack of full certainty should not be used as a reason for postponing measures to prevent environmental or other degradation.”

Best practice impact assessments include holistic ecosystem assessments, particularly with regard to ecologically sustainable development and cumulative impact assessment. In our view the EES fails to address the impacts on matters of national environmental significance.

4. Listed threatened species (under the *Flora and Fauna Guarantee Act 1988* and the *Environment Protection and Biodiversity Conservation Act 1999*) and marine species and communities of high conservation value.

Key issues:

- The EES fails to address the impacts on listed species under the *Flora and Fauna Guarantee Act 1988* (FFG Act) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), and other sensitive marine species and communities.
- The assessment does not meet the guiding principles set out in the *Marine and Coastal Act 2018*, of an ecosystem-based approach, assessment of cumulative impacts and ecologically sustainable development.
- A number of species of high conservation concern found only in the Crib Point region were not recognised or addressed in the EES.

- Literature was decades out of date and little of it is targeted at informing potential impacts and consequences.
- The assessment was overgeneralized and made few actual biological predictions. There was a reliance on the risk assessments, which are scientifically invalid.
- There is a considerable diversity of species and habitat types in the North Arm region, with each of these having differing susceptibilities to different impacts. Some are high priority ecological features and some are of high conservation concern.

a. Protected species listed under the FFG Act and EPBC Act

The EES fails to address the impacts on listed species under the EPBC and FFG Acts in general. We provide a couple of examples below:

Burrnan dolphins (listed as threatened under the FFG Act)

There are knowledge gaps on the status of a potential population of the Burrnan Dolphin (*Tursiops australis*) in Westernport Bay, listed as a threatened species under the state's FFG Act. Without understanding population dynamics of this species, and the areas they utilise, it is impossible to understand the potential impacts that AGL's gas import facility could have, and therefore what mitigation measures to put in place to reduce these risks.

There are two other populations of the Burrnan Dolphin in Port Phillip Bay and Gippsland Lakes, however there are knowledge gaps for Westernport Bay. There has not been thorough surveys to attempt to fill this knowledge gap, and the EES did not attempt to address these knowledge shortcomings, and therefore mitigation to reduce the potential impacts.

Burrnan Dolphins are particularly susceptible to extinction because of the small, localised populations, such as in Port Phillip Bay and Gippsland Lakes, particularly if they occur close to urban areas where there are anthropogenic threats. Such populations are more likely to exhibit low levels of genetic diversity, which leaves them less able to adapt to environmental changes.² The EES fails to adequately assess potential impacts on this significant species and its habitat, either within the immediate project vicinity and more broadly.

² K. Charlton-Robb, A. C. Taylor, S. W. McKechnie (2014). Population genetic structure of the Burrnan dolphin (*Tursiops australis*) in coastal waters of south-eastern Australia: conservation implications

The population in the Gippsland Lakes experiences a three-fold increase in the estimated population in winter, to that which exists in the system for the rest of the year.² If the same were to occur in Westernport, this coincides with peak shipping times and we have concerns this could potentially put this species (a potentially significant population) at risk.

Great White Sharks (listed as vulnerable and migratory under the EPBC Act, and as threatened under the FFG Act)

Great White Sharks (GWS) are known to utilise the northern reaches of Westernport Bay in the Northern Arm, the location of an important food source (largely snapper) for the GWS.

In our view, the EES understates the impact the project could have on the GWS population, as shown in *Technical report A*:

“ They (Great White Shark) are highly mobile, and it is likely that individual great white sharks will pass through the North Arm from time to time.”

There has been no monitoring to back up this claim, and/or the connectivity between the project’s potential impacts and the North Arm of Westernport Bay. Furthermore, the GSW Recovery Plan states that foraging areas, aggregation areas, and sites to which white sharks return on a regular basis may represent habitat critical to the survival of the species.³ With the lack of field work and assessments of project impacts on species such as the GWS, there is potential for impacts to reach this important area for the GWS. The EES fails to consider these impacts.

b. Other high conservation species not considered

We are concerned that there are species of high conservation concern that were not addressed as part of the EES. These include both listed species, and species with high vulnerability to threats.

³ Recovery Plan for the White Shark (*Carcharodon carcharias*) 2013. Australian Government.

c. Inadequate science

We are concerned that much of the literature used as information on marine species was decades out of date and little of it was targeted at informing potential impacts and consequences.

d. Ramsar wetland values

See Section 8 of this Submission, below.

Given the above, it is our view that the EES fails to address potentially significant impacts on listed species under the EPBC Act and FFG Act, and other sensitive marine species and communities. This is a severe oversight, against state and federal legislation.

5. Species movement restrictions in the North Arm

Key issues:

- There is reasonable evidence that the FSRU may restrict the movement for some faunal groups, with potential consequences to biomass, production, and food-webs.
- Impacts to connectivity via North Arm could have ecosystem-level impacts across broad areas of Westernport.
- Combined changes to the environment from seabed scouring from discharge flows, propeller scour, deflection of tidal currents, changes in temperature and turbidity plumes is expected to lead to changes in distribution and the nature of biotopes.

We note that the North Arm has a high diversity of species and habitats, which are inevitably connected to the southern ecosystems of Westernport Bay.

Restriction in the movement of species can be caused from behavioural disruption and barriers including visual, light, noise, vibration, odour, toxicant, temperature, turbidity and other cues.

We are concerned that the FSRU could restrict the movement of faunal groups, with potential consequences to biomass, production, and food-webs.

We are concerned that the EES has failed to assess the combined impacts arising from the project that may restrict species' movements.

6. Failure to address catastrophic incidences and threats - ship collisions, oil spills and gas explosions

Key issues:

- The EES fails to directly address catastrophic threats and events, including a major oil spill, gas explosion or incident. This is concerning given similar events have occurred previously in the region.
- Up to 40 additional ships into Westernport Bay will increase shipping activity by up to 25-40% every year. This increases the risk of these events significantly, as well as risk of ship grounding on sensitive habitats.

a. Catastrophic events not addressed – major oil spills, explosions, ship collisions

The EES fails to directly address catastrophic threats and events, including a major oil spill, gas explosion, incident, or ship collision. This is deeply concerning given similar events have occurred previously in the region, for example:

- Major oil spill – such as the Iron Barren spill in the Tamar Estuary in 1995. Although the FSRU and supply vessels may not carry large quantities of fuel, their operations interact with tankers that do, especially given tankers will pass the FSRU to get to Long Island Point.
- Gas release or gas explosion incident – such as the ethane pipeline rupture in Port Phillip Bay in 2008. Although the ethane rupture event did not lead to catastrophic outcomes, it proves that events such as this can occur are not necessarily rare or unlikely.

A fundamental flaw in the EES is that major spills appear to have been lumped together with minor spills, despite the fact that they differ significantly in terms of impact. This has resulted in a lack of consideration – or glossing over – of catastrophic impacts. This approach of excluding the range of possible events is certainly contrary to the precautionary principle, which is a requirement of state legislation, including the *Marine and Coastal Act 2018*.

We are concerned that the EES acknowledged, rather than genuinely considered, the impact of major oil spills beyond the FSRU area. Given this valuable ecosystem is highly interconnected, this is a severe oversight which has the potential for bay-wide impacts.

The increase in shipping activity was not factored in, with up to 40 additional ships into Westernport Bay increasing shipping activity by up to 25-40% every year. This also increases the risk of ship grounding on sensitive habitats.

The occurrence of a single “rare” event can have serious immediate and long term effects to individuals, communities and the environment and these worst case scenarios were not considered as part of the EES assessments.

We are concerned that the EES dismisses the issue by stating ‘the risk of a collision with another vessel is negligible’ (*Technical Report A, page 400*) rather than properly assessing the impacts on the marine life if this were to occur. This is major oversight.

b. Fuel and chemical spills, discharges

Key issues:

- The EES does not assess potential impacts from diesel spills on sensitive marine communities and marine life, and downplays these impacts on important wetland features such as mangroves and seagrass.
- The EES lacks specific details to accurately assess the impacts of fuel spills on Westernport Bay, thereby significantly compromising the assessment of environmental effects.

We have concerns over the risk of fuel and chemical spills and the lack of specific detail in relation to the impacts of spills on marine life. The lack of specific details significantly compromises the assessment of spill effects.

Equally concerning is the dismissal of the risk of diesel spills, as the EES only considers potential impacts on particular areas.

The EES fails to adequately consider the potential impacts arising from ship collisions, oil spills, gas explosions, ship grounding, and fuel and chemical spills. These potential environmental effects are unacceptable, and we consider that an inadequate assessment of such impacts does not meet the Minister’s scoping requirements for the EES.

7. Hydrodynamic modelling

Key issues:

- Based on the hydrodynamic studies in the EES, we consider that there is likely to be a significant underestimation of, or total failure to address, many factors required to estimate marine biodiversity impacts.
- In general, the claims within the EES regarding hydrodynamic impacts are not supported by evidence or sound methodology.
- The failure to assess impacts due to the above factors is alarming given the hydro-connectivity between Crib Point and the northern channels of Westernport Bay.

The hydrodynamic modelling within the EES is not comprehensive and given the resulting impacts on marine biodiversity, this level of assessment is unacceptable.

8. Westernport Bay – a RAMSAR wetland of international importance

Key issues:

- As set out above, the EES fails to adequately assess marine biodiversity impacts arising from the project. This is unacceptable given the marine environment in which the project is proposed forms part of an internationally significant Ramsar wetland.
- The EES failed to address significant components of marine biodiversity which contribute to Westernport Bay's ecological character.

Westernport Bay was designated a wetland of international significance under the Ramsar Convention on Wetlands of International Importance in 1982. The ecological character of Westernport Bay is unique. It has many critical components, connections and processes that contribute to its ecological character, including important habitat for more than a hundred waterbird species and a diversity and abundance of fish.

Westernport Bay's environment and supporting ecosystem has strong ecological linkages between the coastal and marine habitats across different areas of the bay which drive the ecological character

of Westernport Bay and are fundamental to Westernport Bay's ecological character description, as outlined in Westernport Bay Ramsar Wetland Ecological Character Description.⁴

We are concerned the EES did not address significant components of marine biodiversity which make up Westernport Bay's Ramsar ecological character. We are also deeply concerned that the EES did not adopt an ecosystem-based approach to its assessment of impacts on marine biodiversity.

9. Ecosystem assessments and cumulative impacts – inconsistent with the Victorian *Marine and Coastal Act 2018*

Key issue:

- By failing to consider ecosystem-level impacts, provide for ecosystem-based management and or adequately assess cumulative impacts, the EES is inconsistent with state legislation and policy.

Any project or use of the marine and coastal environment needs to consider ecosystem-based management, which is not only best practice, but a core principle of the *Marine and Coastal Act 2018*, Marine and Coastal Policy and the Westernport Ramsar Management Plan. This means looking at ecosystem connections and impacts.

The EES failed to consider ecosystem-level impacts or provide for ecosystem-based management. The EES also failed to adequately assess cumulative impacts. This directly ignores state legislation and policy and best practice. For example, there was minimal consideration given to the connections between marine life and different areas between the coastal areas, the intertidal areas and the submerged marine environment.

Important principles set out in state legislation and policy were inadequately considered in the EES, such as the principle of ecosystem-based management and the requirement to assess cumulative impacts. Given the significant potential impacts the project poses to marine biodiversity, we consider this to be unacceptable.

⁴ Westernport Bay Ramsar Wetland Ecological Character Description
<https://www.environment.gov.au/system/files/resources/95deb742-85da-4785-8206-7ec139bdfaa8/files/19-ecd.pdf>

10. Poor science

Key issues:

- The marine biodiversity component of the EES was done very poorly.
- The methodology of the EES was fundamentally flawed and cannot be considered as scientifically valid.
- There was either no review of types of impacts on certain aspects of marine or wetland biodiversity, or considerable knowledge gaps in determining what the impacts could be, with no or minimal supporting evidence to be confident in the level of impact the project could have.
- The lack of supporting evidence has led to the downplaying of major issues, such as toxicants, oil spills and marine pests.

Our view is that the marine biodiversity field studies lack adequate scientific backing. For all the types of marine and wetland impacts that could occur, the EES provided insufficient supporting evidence for its predictions. This has led to minimising and downplaying major issues, such as toxicants, oil spills and marine pests.

In many cases there was no supporting evidence for the predictions of impact of the project on biodiversity in the EES field program. This was the case for the risk assessment, mitigation and management framework sections.

The marine section of the EES was done to a very poor standard with no, or minimal, science to back up many issues arising from the project. This resulted in a downplaying of what could ultimately be significant impacts on Westernport Bay.

TERRESTRIAL IMPACTS

11. General concerns

Key issues:

- Native vegetation removed to make way for the pipeline will result in the direct loss of 15 hectares of native vegetation – almost half of which is endangered vegetation types.
- The pipeline is proposed to go through Warringine Park, a covenanted Council reserve of > 100 hectares between Hastings and Crib Point.
- Many predictions of impact (such as artificial light impacts on wildlife) have inadequate supporting evidence to back up the claims within the EES.

12. Threatened species

Key issues:

- The existence and ongoing maintenance of the pipeline is a serious threat to the survival of the Nationally-endangered Southern Brown Bandicoot (listed under the EPBC Act), that has received major investment by governments and community over a long period time. The project will directly result in the removal of vegetation from sites of likely habitat of the Southern Brown Bandicoot. This could result in local extinctions of this species.
- Within the pipeline works area, the project has the potential to impact on large number of threatened species, including:
 - 8 EPBC Act listed species,
 - 19 FFG Act listed species;
 - 30 *Department of Environment, Land, Water and Planning Advisory List species*
 - a total of 32 threatened species potentially impacted.
- Significant species in the gas import jetty works area that the project has the potential to impact on include:
 - 9 EPBC Act listed species,
 - 13 FFG Act listed species;
 - 30 *Department of Environment, Land, Water and Planning Advisory List species*
 - a total of 42+ threatened species potentially impacted.

- The pipeline directly impacts on one of only four-five populations in Victoria of the threatened Merran's Sun-orchid.

Southern Brown Bandicoot (listed as endangered under the EPBC Act, and threatened under the FFG Act)

VNPA supports many parts of the submission made by DG Nicholls, from the Southern Brown Bandicoot Regional Recovery Group, with respect to the nationally-endangered Southern Brown Bandicoot. We support the following statements:

- The existence and ongoing maintenance of this pipeline is a serious threat to the survival of the nationally-endangered Southern Brown Bandicoot (listed under the EPBC Act) that has received major investments by governments and community over a long period time. The project will directly result in removal of vegetation from sites of likely habitat of the Southern Brown Bandicoot. This could result in local extinctions of this species.
- It (the EES) fails to recognise the very substantial efforts by state and local government to manage this environment to provide the conditions for the continued survival for this species (and other species, including the endangered Growling Grass Frog, *Litoria raniformis*).
- These impacts negate the good efforts of the Victorian Department of Environment, Land, Water and Planning as it implements the EPBC legal requirements of the Melbourne Strategic Assessment.
- There are incremental threats that endanger the government and community efforts to secure local populations of the Southern Brown Bandicoot *Isodon obesulus*. These include:
 - vegetation removal or modification for roadside safety or bushfire risk reduction,
 - increased vehicle traffic on quiet rural roads resulting in bandicoot roadkill,
 - increased density of domestic pets (cats and dogs) leading to increased predation,
 - increased property and infrastructure development reduces habitat
 - climate change drying soils thereby reducing bandicoot food supply.
- The AGL/APA EES systematically notes many of these environmental effects, however, there is little evidence in AGL's plans that indicate appreciation of the cumulative loss that occurs with each of these intrusions.

We are also concerned that the project will directly impact on 16/35 sites containing likely habitat for EPBC listed Southern Brown Bandicoot through vegetation removal.

OTHER MATTERS

13. EES process

We wish to draw to the IAC's attention to the particularly challenging nature of the public exhibition period for this EES process.

The public exhibition period coincided with Stage 3, and then Stage 4, restrictions imposed due to the coronavirus pandemic.

We note that the Minister for Planning issued amended procedures and requirements on 1 June 2020 for the public exhibition period. However, circumstances changed markedly after that date, as reflected by the Premier's Declaration of a State of Disaster and the suspension of Parliament and all but essential Court and Tribunal business. The VNPA and other groups requested that the Minister suspend the public exhibition of the EES until the further restrictions were eased, but our request was refused.

We note the above, because we consider that our ability to properly engage in the process has been impacted by the coronavirus lockdown.

Thank you for the opportunity to comment on this EES. We look forward to presenting further detail and evidence at the public hearings.

Yours sincerely,



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