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Introduction

The *United Nations Intergovernmental Panel on Climate Change (IPCC)* released the sixth assessment report on 9 August 2021¹. Every region on the planet is affected by anthropogenic climate change, and extreme droughts, floods, wildfires, heatwaves and storms are all set to increase in frequency and severity if global heating continues. If drastic and immediate action is taken we may prevent a global temperature rise above 1.5°C. Even in the best-case scenarios, some of the changes are irreversible for millennia, including rises in sea levels. The World Alliance of Scientists published their 2021 review of the planet's health based on vital signs on 28 Jul 2021² - it has worsened since their first report in Jan 2020³, in which they posed a 6-point plan for climate action. Given the extent of damage and expected ongoing climate damage, we cannot act too extremely, or too urgently; nothing will be an over-reaction.

We must act with urgency and extreme responses to have any impact on the extent of climate damage. We must address the drivers of climate damage, including use of fossil fuels, which includes gas.

Three major crises are threatening life on Earth - biodiversity emergency, climate emergency, emerging diseases (*e.g.* COVID-19)^{4,5}. Animal agriculture, and the way we use and abuse animals, nature and the planet's resources are at the centre of them all⁶. The Victorian Government's policy and governance must include appropriate, immediate and timely actions to address these three existential crises.

Climate change is one of the five major drivers of biodiversity loss and ecosystem decline^{7,7}. The *United Nations Global Biodiversity Outlook 5* report recognises the Biodiversity Emergency and that we need to act with urgency to modify our actions in key areas⁸. It identifies eight critical transitions that are required to shift to a "sustainable coexistence with nature". One of these

¹ IPCC (2021) Sixth Assessment Report - AR6 Climate Change 2021: The Physical Science Basis. <https://www.ipcc.ch/report/ar6/wg1/>

² Ripple WJ, *et al.* (2021) World Scientists' Warning of a Climate Emergency 2021, *BioScience*, 2021,;biab079, <https://doi.org/10.1093/biosci/biab079>

³ Ripple WJ, *et al.* (2020) World Scientists' Warning of a Climate Emergency, *BioScience*, 70(1): 8-12, <https://doi.org/10.1093/biosci/biz088>

⁴ Grandcolas P. & Justine J-L. (2020) COVID-19 or the pandemic of mistreated biodiversity. *The Conversation* 30/4/2020 <https://theconversation.com/covid-19-or-the-pandemic-of-mistreated-biodiversity-136447> accessed 11/8/2021

⁵ Armstrong F. Capon A. & McFarlane R. (2020) Coronavirus is a wake-up call: Our war with the environment is leading to pandemics. *The Conversation* 31/3/2020 <https://theconversation.com/coronavirus-is-a-wake-up-call-our-war-with-the-environment-is-leading-to-pandemics-135023> accessed 11/8/2021

⁶ Intergovernmental Panel on Climate Change 6th Assessment Report <https://www.ipcc.ch/report/ar6/wg1/> accessed 13/8/2021 ⁷ IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany. 56 pages. <https://ipbes.net/global-assessment>

⁷ IPBES (2020) Models of drivers of biodiversity and ecosystem change. <https://ipbes.net/models-drivers-biodiversityecosystem-change>

⁸ Secretariat of the Convention on Biological Diversity (2020) Global Biodiversity Outlook 5. Montreal. <https://www.cbd.int/gbo/gbo5/publication/gbo-5-en.pdf>

transitions is *climate action*, five of the transitions are *related to industry*, and one specifically addresses *infrastructure*. If Victoria can act with urgency to employ this plan, we will be well-placed to preserve biodiversity and ecosystems, tackle the climate emergency and support the health and well-being of all Victorians, regardless of species. The eight transitions are:

1. The land and forests transition: conserve intact ecosystems, restore ecosystems, combat and reverse degradation, and avoid and reduce land-use change.
2. The sustainable fisheries and oceans transition: protect and restore marine and coastal ecosystems, and manage all ocean activities to ensure sustainability.
3. The sustainable freshwater transition: an integrated approach to guarantee water for nature and people, improve water quality, protect critical habitats, control introduced species and safeguard connectivity to allow the recovery of freshwater systems from mountains to coasts.
4. The sustainable agriculture transition: redesign agricultural systems through agro-ecological and biodiversity-sensitive practices.
5. The sustainable food systems transition: enable sustainable and healthy diets with an emphasis on diverse foods, mostly plant-based, and reduce consumption of animal products and production of waste.
6. The biodiversity-inclusive One Health transition: manage ecosystems, including agricultural and urban ecosystems and wildlife, through an integrated approach to promote healthy ecosystems and healthy people
7. The sustainable climate action transition: employing nature-based solutions, alongside a rapid phase-out of fossil fuel use, to reduce the scale and impacts of climate change, while providing positive benefits for biodiversity and other sustainable development goals.
8. The cities and infrastructure transition: deploy 'green infrastructure' and make space for nature within built landscapes to improve the health and quality of life for citizens and to reduce the environmental footprint of cities and infrastructure.

Victoria has adopted a climate change strategy which is working towards net zero emissions targets by 2050⁹. As part of creating this roadmap for positive change to reduce our impact on climate change, there have been recent consultations that included Victoria's energy system; 'Towards 2050: Gas infrastructure in a zero emissions economy'¹⁰, 'Help us build Victoria's gas substitution roadmap'¹¹ and 'Building a climate resilient Victoria'¹³, which consisted of seven consultations. All consultations are ongoing, but overwhelmingly they have rightly identified that Victoria must end its reliance on gas, and indeed all fossil fuels, as energy sources and

⁹ <https://www.climatechange.vic.gov.au/victorias-climate-change-strategy>

¹⁰ <https://engage.vic.gov.au/towards-2050-gas-infrastructure-zero-emissions-economy>

¹¹ <https://engage.vic.gov.au/help-us-build-victorias-gas-substitution-roadmap>

¹³ <https://engage.vic.gov.au/aaps>

explore other options if we are to meet our net zero emissions targets and effectively address climate damage and biodiversity loss.

Therefore, investing in new gas exploration at this point in time is illogical and baffling.

It runs the real risk of creating stranded assets which will be a potential burden for taxpayers, it ignores the environmental and climatic impact of promoting and continuing a reliance on natural gas for energy, and it creates infrastructure which has little or no ability to be repurposed in a zero emissions system.

Victoria has a high reliance on gas usage, primarily due to historical ready availability and affordability¹². Oil and gas account for over 60% of all energy consumption in Australia¹³. If the goal was to continue to rely on natural gas as a significant source of energy for the state, then encouraging onshore conventional petroleum resource exploration and development in Victoria would be a timely action.

However, in 2017-18, natural gas contributed to 17% of Victoria's carbon dioxide emissions and of this, 70% was used in direct combustion, for example domestic space heating and water heating, and domestic and commercial cooking to a lesser degree. Therefore, a reduction in natural gas use will have a significant effect on our emissions, and help us work towards our net zero emissions target with a view to decommissioning its use. To therefore state that '*The program's environmental studies showed that developing these gas resources to secure local gas supply...would also have a negligible impact on Victoria's greenhouse gas emissions*'¹⁴ is utter madness and calls into question the accuracy of every other statement made throughout this *Petroleum Regulatory Impact Statement* report.

Investing in onshore conventional petroleum resource exploration and development in Victoria is a *poor economic decision*, considering our ultimate aim is to move towards electrification and alternative, clean forms of energy.

As we move towards alternative sources of energy in the short-to-medium-term, any exploratory infrastructure will become obsolete and money spent on exploration will be

¹² https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/4916/2622/6516/Gas_Infrastructure_Advice_-_Interim_Report_FINAL_4.PDF

¹³ <https://www.appea.com.au/industry/oil-and-gas-explained/oil-and-gas/>

¹⁴ Proposed Petroleum Regulations - Regulatory Impact Statement. Proposed Petroleum Regulations 2021.

https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7216/2813/2068/Petroleum_RIS.pdf

¹⁷ Victorian Government (2021) Regulatory Impact Statement for draft Petroleum Regulations.

<https://engage.vic.gov.au/regulatory-impact-statement-draft-petroleum-regulations>

wasted; the company responsible for these actions will likely require compensation to recoup their costs at taxpayers' expense.

The **[Redacted]** believes this *Statement of Regulatory Intent* should be rewritten to detail how the industry will be entering caretaker mode and planning to wind down operations to align with the long-term emissions goals of the Victorian Government.

According to the documentation provided for this consultation^{16, 17}:

This Regulatory Impact Statement (RIS) was prepared to facilitate consultation on new proposed Petroleum Regulations 2021 (proposed regulations) to support the orderly restart of the onshore conventional gas industry.

This RIS analyses three options in detail, which are compared to the Base Case of allowing the regulations to sunset:

- *Status Quo – reinstate the current Petroleum Regulations 2011 for a further 10 years with no changes. The Status Quo would consist of a remake of the Petroleum Regulations exactly as they currently stand for a further 10 years with no changes. In other words, the existing regulations would be reissued in their current form, until October 2031.*
- *Option 1 – Outcomes focussed regulations . Option 1 would involve introducing regulations that reflect the amendments to the Petroleum Act and the requirement to restart the industry, and at the same time are more outcomes and objectives focussed than the Status Quo.*
- *Option 2 – Standards based regulations. Option 2 would involve introducing regulations that reflect the amendments to the Petroleum Act and the requirement to restart the industry, but which are more prescriptive than both the current regulations and Option 1. This Option also includes the making of a legislative Code of Practice on drilling and well management³.*

Our submission discusses the questions posed by the consultation survey; recommendations are provided throughout our submission. This submission is guided by our mission and vision and underpinned by our policies. The **[Redacted]** has policies on animals, environment and human

issues¹⁵. Our policies on climate change¹⁶, energy¹⁷, environment¹⁸, land clearing¹⁹, natural gas²⁰, wildlife and sustainability²¹ and waste²² are particularly relevant to this consultation.

Thank you for the opportunity to contribute to this consultation.

1. Do you believe the proposed regulations will encourage investment in the onshore conventional petroleum sector in Victoria?

The proposed regulations detail the steps required to facilitate the orderly restart of the onshore conventional gas industry²³. This methodical explanation of how to recommence operations will likely encourage those who value personal economic gain over the environmental future of our state and what is best for all Victorians.

Recommendations:

1. Do not expand natural gas use, whether from coal seam or other sources²⁴.
2. Do not invest in existing gas infrastructure upgrades or developments.
3. Implement a carbon tax on fossil fuels.
4. Prohibit any fossil fuel expansion²⁵.
5. Immediately cease subsidies of non-clean energy.
6. Create a strategic plan to decommission Victoria's gas infrastructure. Include an assessment of the costs involved and how these will be borne.
7. Include the impact on animals, the environment and human and planetary health in the selection criteria for all clean energy sources.
8. Eliminate vested interests in decision-making.

¹⁵ [Redacted]

¹⁶ [Redacted]

¹⁷ [Redacted]

¹⁸ [Redacted]

¹⁹ [Redacted]

²⁰ [Redacted]

²¹ [Redacted]

²² [Redacted]

²³ [Redacted]

²⁴ [Redacted]

²⁵ [Redacted]

9. Prioritise long-term solutions which will help us meet our climate emissions target.
 10. Consider the environmental impact of these proposed changes on wildlife and wildlife habitat.
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2. Do you believe the proposed regulations adequately support community engagement and consultation?

A process for public consultation was offered through the use of a consultation on Engage Vic which welcomed public comment as well as stakeholder engagement. We note this consisted largely of those with a vested interest in this proposed gas exploration: 11 authority holders, 6 government departments, 3 industry associations and only 3 spots given to traditional owners groups, Environment Vic and local community members²⁶. We note the absence of any wildlife, environment or climate change stakeholders.

It is unclear how widely this consultation was advertised to local communities who will be affected by onshore gas exploration, or interested community groups, especially those who wish to protect the environment. Without a detailed summary of how and where the consultation was advertised and promoted, this question cannot be accurately answered.

The fact that *'The consultations found that the majority of affected communities were at least tolerating onshore conventional gas, but improvements could be made through increased transparency and genuine engagement opportunities'*²⁷ is hardly a ringing endorsement of support from the community.

Recommendations:

11. Ensure ALL guidelines for an effective online consultation are met²⁸
12. Ensure particular attention is given to the requirements for 'sufficient planning and lead time' (6), 'Combine online consultation with other methods' (7), 'Communicate your consultation widely. Share and link users to the page' (8)²⁸

²⁶ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7216/2813/2068/Petroleum_R_IS.pdf

²⁷ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7216/2813/2068/Petroleum_R_IS.pdf

IS.pdf

²⁸ <https://www.vic.gov.au/set-public-consultation>

3. What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of the application process for authorities (e.g. retention and production titles)?

It is unclear what, if any, consultation requirements there are with the community in the areas of retention and production titles.

Whilst parts 3 and 4 of the 'Draft petroleum Regulations 2021' detail that the following information must be presented:

- (a) the likely regional economic, social and environmental risks and impacts of the program;*
and
- (b) the likely regional benefits of the program relative to its likely risks and impacts; and*
- (c) the extent to which these risks and impacts can be managed at the regional level and how the applicant proposes to do this²⁹,*

which would be of interest to communities affected by proposed onshore gas exploration, the details of how the results of this are to be communicated to the community are either lacking, or difficult to find, which leads us to question their dedication to ensuring that true community consultation occurs.

Recommendations:

13. Ensure adequate opportunities for community consultation are embedded in each step of the process.
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²⁹ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7916/2745/8231/Draft_Petroleum_Regulations.pdf

4. What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of Operation Plan?

Part 7 of the 'Draft petroleum Regulations 2021' contains considerable detail regarding information that must be provided to the Minister, but significantly less about involving the community³⁰.

The documents state that an authority holder must provide:

- (a) the name and postal address of the holder of the authority;*
- (b) a contact name, telephone number and email address of a representative of the holder of the authority to which requests for further information may be made;*
- (c) the form in which written submissions must be made, and the physical address or email address to which any submission may be conveyed or submitted;*
- (d) the date on which the holder of the authority proposes to commence considering the submissions³³;*

This is insufficient without also detailing HOW and WHERE this information will be provided and promoted to the community to enable sufficient opportunities for comment.

Recommendations:

- 14. Ensure detailed methods of community consultation are included in 'Draft petroleum Regulations 2021'.

5. What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements for community engagement during the life of exploration, retention and production titles (as required in the title application)?

It's very unclear what, if any, consultation requirements there are with the community in relation to ongoing activities in the areas of retention and production titles.

³⁰ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7916/2745/8231/Draft_Petroleum_Regulations.pdf

Recommendations:

15. Include clear, detailed requirements for ongoing community consultation opportunities to be conducted at regular intervals throughout the life of any gas exploration processes within the *'Draft petroleum Regulations 2021'*.
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6. What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements to describe community engagement during operations (as required in the Operation Plan)?

The requirement to provide *'a summary of how the authority holder proposes to ensure the community is consulted over the life of the petroleum operation³³'* is theoretically a positive step, but unfortunately is not vastly useful to a community largely unaware of the proposed operation due to insufficient processes of notification earlier in the process.

Recommendations:

16. Ensure requirements for ongoing community consultation follow on from adequate requirements in the earlier stages of the application process in the *'Draft petroleum Regulations 2021'*.
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7. Do you have any suggested improvements to the proposed regulations?

These proposed regulations should be focused on how we should be transitioning away from our reliance on natural gas and how Victoria plans to wind up current gas supply networks.

In the absence of this occurring, *e.g.* if onshore gas exploration is to recommence, the proposed regulations must include a detailed procedure for how local communities are to be consulted which includes how these opportunities are to be promoted and conducted.

Additionally, the requirement for environmental management plans must include greater details about what information is to be included. This must contain a detailed analysis of all species, plants, animals (vertebrates and invertebrates) and fungi, in the surrounding area, an

assessment of wildlife habitat that may be affected and biodiversity and environmental impact studies.

There must also be a requirement for how rehabilitation works will be carried out which includes how initial baseline assessments will be conducted, how and over what time period rehabilitation works will be carried out, and how the success will be measured in the short and long-term.

Recommendations:

17. Establish an independent body to assess all environmental management plans prior to commencement of any exploration projects. Ensure members have no vested interests that could affect their decision-making.
18. Investigate conflicts within the aims of various government departments and how to untangle these. For example, the RIS acknowledges Victoria's 'gas substitution roadmap' which aims to lead us away from gas usage in Victoria, yet still promotes future onshore gas exploration.

8. Do you believe the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for grant of Exploration, Retention and Production Titles?

The proposed 'Draft petroleum Regulations 2021' require that applications contain information on :

- (a) *the likely regional economic, social and environmental risks and impacts of the program; and*
- (b) *the likely regional benefits of the program relative to its likely risks and impacts; and*
- (c) *the extent to which these risks and impacts can be managed at the regional level and how the applicant proposes to do this.*

These requirements are so broad and lacking in detail, that they are nearly useless.

Recommendations:

19. Expand the requirements within the '*Draft petroleum Regulations 2021*' to provide sufficient detail about the information that must be included regarding the social, economic and environmental impacts.
 20. Compile this list of required information in conjunction with the independent advisory body.
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9. Do you believe that the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for Operation Plan approval/variation and authority surrender?

It is unclear who is responsible for assessing that social, economic and environmental factors have been met in order to allow authority surrender. Nor is it clear over what time period rehabilitation works must be conducted.

The description of how social, economic and environmental factors are to be assessed lacks sufficient detail. Initially it is stated that the risks and impacts on these areas must be summarised. Later there is a more detailed list of information required, however it still does not go far enough towards providing a clear picture of environmental impacts. This does not provide sufficient information for effective, accurate, transparent decision-making.

Recommendations:

21. Expand the requirements within the '*Draft petroleum Regulations 2021*' for social, economic and environmental risks and impacts to be sufficiently detailed to guide decision-making.
22. Include a requirement to conduct an independent study to identify all wildlife populations along the proposed area of land clearing, including invertebrates.
23. Include a requirement to investigate the impact on each population from loss of wildlife habitat.
24. Include a requirement for modelling to assess the impact on biodiversity from land clearing and habitat loss.
25. Include a requirement to investigate the potential impact on health from changes to air quality and the subsequent costs to the health system.

26. Include a requirement to conduct an independent study to quantify carbon sequestration loss from deforestation and soil disturbance.
 27. Include a requirement to model the impacts on water quality, habitat and flood risk from proposed land clearing and waterway changes.
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10. Are the proposed operation plan requirements to manage risks and impacts likely to be effective specifically as they relate to environment management plans, well operation management plans, code of practice of well operations management and rehabilitation plans?

The proposed operations plans have varying degrees of effectiveness in these areas.

The environmental management plans do not contain a requirement to list all flora and fauna within an area before destruction works commence, therefore accurate evaluation of risks and impacts is impossible.

Well operation management plans are outside our scope of expertise, however we note a lack of requirement to detail environmental impacts caused by wells.

The environmental rehabilitation plans lack sufficient detail to be truly useful and enforceable. On a positive note, they specify a requirement to *'include measurement methods for determining whether those objectives and standards have been met'*³¹. However there is no detail about who is responsible for this monitoring, nor is there sufficient detail listing the standard or rehabilitation that must be undertaken.

Recommendations:

28. Expand the description of environmental rehabilitation requirements within the *'Draft petroleum Regulations 2021'*
29. Include a requirement for environmental assessment of well-related activities in the *'Draft petroleum Regulations 2021'*
30. Include a requirement for comprehensive flora and fauna assessment of gas exploration affected and surrounding land in the *'Draft petroleum Regulations 2021'*

³¹ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7916/2745/8231/Draft_Petroleum_Regulations.pdf

11. Are the proposed information and reporting requirements likely to be effective specifically as they relate to progress against a work program?

The details for the requirement to consult with *'the community and if relevant Traditional Owners'*³², appears to be very sparse in detail, which will impact their effectiveness.

Recommendations:

31. Consult with representatives of different Traditional Owners groups and Community groups to ensure that the requirements in the *'Draft petroleum Regulations 2021'* for consultation are deemed sufficient.

12. Are the proposed information and reporting requirements likely to be effective specifically as they relate to rehabilitation undertaken and changes in liability?

The proposed requirements for changes in liability appear to refer to satisfying the Minister as to their sufficiency. There is no mention of satisfying those potentially affected, such as Traditional Owners, or the independent body who would hopefully be considering the best interests of plants, animals and environment generally.

The requirements for rehabilitation reporting are insufficient as it is unclear who the authority holder is accountable to in this area.

Recommendations:

³² https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/7916/2745/8231/Draft_Petroleum_Regulations.pdf

32. Ensure there is a clear chain of command and responsibility detailed in the '*Draft petroleum Regulations 2021*'

13. Are the proposed information and reporting requirements likely to be effective specifically as they relate to results of monitoring undertaken?

It is unclear who is responsible for overseeing, evaluating and reporting on monitoring activities.

Recommendations:

33. Ensure accountability of authority holders by detailing the requirement for monitoring to be conducted by an independent body.

14. Are the proposed information and reporting requirements likely to be effective specifically as they relate to community engagement undertaken?

As they stand, the requirements for community consultation represent a starting point.

There is insufficient detail on requirements for how community consultation opportunities will be promoted, what degree of credence will be given to community concerns, and who the authority holder is ultimately accountable to if the community is unhappy with the results of their consultation. Additionally, since the environmental impacts affect climate change in terms of biodiversity loss and emissions production, the definition of community must be broadened, as all of Victoria is affected by the decisions to recommence gas exploration.

Recommendations:

34. Expand the description of community monitoring requirements .

15. Are the proposed information and reporting requirements likely to be effective specifically as they relate to operational activities?

The *'Draft petroleum Regulations 2021'* contain provisions for information reporting and a process of self review which is to be submitted to the Minister. However, there is no requirement or provision for oversight by an independent body, which decreases the effectiveness of these requirements.

Recommendations:

35. Include a requirement to involve an independent body in an oversight capacity to ensure there is a process of 'checks and balances'.
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16. Are the proposed information and reporting requirements likely to be effective specifically as they relate to incidents?

A clear definition of what constitutes an 'incident' would clarify this requirement.

Recommendations:

36. Review terms used within the *'Draft petroleum Regulations 2021'* to identify unclear or ambiguous words or phrases.
 37. Include clear definitions in the glossary.
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17. Are the proposed information and reporting requirements likely to be effective specifically as they relate to geological data?

It is unclear whether there are sufficient requirements for geological data and this is outside our scope of expertise. We note the lack of requirement to consult with a geologist or expert in this field.

Recommendations

38. Ensure expert opinion is sought where required for effective decision-making.

18. Do you believe that the new regulations will provide a clear and effective administrative framework that facilitates petroleum development activities?

The new regulations provide increased clarity compared to the previous version to facilitate petroleum development activities. However, there are many gaps and areas that require improvement. Rather than waste time on improving this, we should focus on moving Victoria away from its reliance on gas usage.

Recommendations:

39. Create a list of priorities for energy production in Victoria, in conjunction with independent bodies, to guide allocation of resources for the future.

19. Would you like to comment on any other aspects of the proposed regulations?

In light of the need to reduce our reliance on gas usage in Victoria, we would like to raise the futility of spending time on encouraging the recommencement of gas exploration activities and suggest this time and energy be put into exploring alternative forms of clean, renewable energy instead.

Recommendations:

40. Immediately commence decommissioning of gas infrastructure.

41. Shift the focus of future exploration to alternative, clean, renewable energy sources.

Conclusion

Victoria has set a net emissions target of zero by 2050 and identified a move away from gas usage as one of the key features to achieve this goal. As part of the strategic plan, or roadmap, that will guide us over the next 30 years we need to employ long-term, future-thinking and stop trying to find new ways to access gas to meet our current needs. Instead we need to investigate and encourage methods to lessen Victoria's reliance on gas, and help people, companies and industry to move towards cleaner forms of energy.

We must stop trying to find ways to 'keep doing what we are doing' and greenwash our actions and instead start seriously considering how to create a more sustainable future for Victoria, starting with our methods of energy consumption. Collaboration between departments and a genuine desire to do what is best for all Victorians is imperative, including consideration for the environment and the effects on biodiversity and climate change.

This *Regulatory Impact Statement* for draft Petroleum Regulations must be rewritten to detail how Victoria will move away from its reliance on gas, not how to open up more gas exploration.