

Memorandum

To	Chris Wiseman	Page	1
CC	Allan Klindworth		
Subject	Response to EPA West Gate Tunnel Project Inquiry and Advisory Committee Presentation (14 August)		
From	Will Symons		
File/Ref No.	60338862	Date	17-Aug-2017

Dear Chris,

This memo provides our response to the following greenhouse gas related 'new matters' outlined in the EPA's presentation to the West Gate Tunnel Project Inquiry and Advisory Committee on 14 August, 2017 (slide 17):

"It is unclear how the fulfilment of, Environmental Performance Requirement GGP1, a GHG related objective of the EMF, could be established.

1. EPA recommends EPR GGP1 should be reworded to clarify its purpose and how its progress can be tracked as part of the EMF.
2. Establish a 'base case' against the Project case to improve the transparency of the assessment and clearly indicate where GhG and energy reductions are being targeted.
3. Consideration of the alignment of the Project with National, State and local policies relating to GhG emissions."

In addition, we have responded to the following comment from the notes that accompanied the presentation slides:

Paragraph 70: The greenhouse gas impact assessment should be amended or a supplementary report prepared to detail the design specifications of the ventilation system, options analysis and how it achieves best practice in terms of energy use compared to other options considered and determined to be inferior. (p16)

Response to presentation item #1

The intention is for the progress of the Environmental Performance Requirement (EPR) GGP1 to be tracked through the application of the Infrastructure Sustainability Council of Australia's (ISCA's) Infrastructure Sustainability (IS) rating framework. The following text from page 13 of *Technical Report Q – Greenhouse Gas* (the Assessment Report) describes the IS rating requirements that have been set for the project.

"To guide the optimisation of the design, the West Gate Tunnel Project commits to achieve Excellent 'Design' and 'As Built' ratings under the Infrastructure Sustainability Council of Australia's (ISCA's) Infrastructure Sustainability (IS) rating framework. This would include achievement of mandatory credits and levels associated with minimising energy use and greenhouse gas emissions (credit Ene-1 (Level 2)) and reducing lifecycle impacts of materials (Mat-1 (Level 2)). Project Co is targeting the achievement of Ene-1 (Level 2.7) which is above the minimum project requirement of Level 2 and relates to approximately a 25 per cent reduction in energy use from the base case, (anticipated to be the Reference Design). Project Co is also targeting Ene-2 (Level 1), which relates to investigating the use of renewable energy, but does not require the implementation of actions that may be identified."

Response to presentation item #2

The scope of the greenhouse gas assessment was to estimate the emissions associated with the construction and operation of the project relative to a 'no project' case. Section 5.1 *Existing Conditions* of the Assessment Report (p30) provides greenhouse gas emissions at the national, state and regional level as basis for comparison (i.e. the no project scenario).

The scope of the greenhouse gas assessment did not include the identification of potential options for minimising the greenhouse gas emissions associated with the project. The greenhouse gas assessment identified the EPRs that are required to be achieved (e.g. achievement of mandatory credits under the IS rating framework). The specifics of how the EPRs will be achieved are to be determined by the contractor during the detailed design process. For reference, Section 2.4 *Greenhouse Gas Emissions Considerations in the Design* (p13 of the Assessment Report) identifies actions that were identified by the Project Co in its design submission that would be undertaken to improve the sustainability outcomes of the project.

Response to presentation item #3

Section 4.0 *Legislation and Policy* (pp26-29 of the Assessment Report) includes a list of Commonwealth, State and Local legislation and policy that were considered in the assessment.

An assessment of the project against the *Transport Integration Act 2010* was not part of the scope of the greenhouse gas assessment.

The scope of the greenhouse gas assessment was to estimate the emissions associated with the construction and operation of the Project relative to a 'no project' case. The assessment of alternative projects (e.g. projects with a different mix of public transport versus private vehicle use) to enable a comparison of their relative emissions profile was beyond the scope of the greenhouse gas assessment

Response to paragraph #70

EPR GGP1 (p37 of the Assessment Report) includes a requirement to "Include mandatory actions under the Protocol for Environmental Management (Greenhouse Gas Emissions and Energy Efficiency in Industry) for selection of best practice energy usage for the Tunnel ventilation and lighting systems." The evidence to support the achievement of this EPR is beyond the scope of the greenhouse gas assessment.

Thank you for the opportunity to provide this response.

Yours faithfully



Will Symons
Practice Leader, Sustainability and Resilience
will.symons@aecom.com

Mobile: +61 408 993 475
Direct Dial: +61 3 9653 8449
Direct Fax: +61 3 9654 7117