

Campaign submission

To Whom it May Concern,

Victoria has the opportunity to adopt best practice regulations for the fossil fuel industry that will ensure the wellbeing and safety of Victorian communities and our environment.

This can be achieved by the inclusion of the following considerations in the Petroleum Regulations going forward.

Between 2010 and 2016, some 75 Victorian communities ran door-knock consultations within their own towns to test community sentiment towards gas development. There was overwhelming support for the proposal to declare towns and regions Gasfield Free. Victoria's regulations should compel gas developers to meet the same or a higher standard of community consultation.

Industry should be required to conduct thorough consultation with communities by:

- * comprehensive letterboxing of all residents and community organisations throughout any region where gas development is proposed within a 50km radius of any proposed gas development;
- * direct outreach to all additional and relevant stakeholders who may not be within the immediate region;
- * public access to application documents in every town and locality within 50km of any proposed gas development;
- * notification of all applications for exploration permits, retention leases, and production licences published in all local, regional and state-wide newspapers; and
- * publication of all applications for exploration permits, retention leases, and production licences, on Engage Victoria.

Gas development should not be allowed to proceed unless all valid community concerns are adequately addressed and updates are provided to those stakeholders on the investigations, processes, and decisions that have taken place in response to the concerns.

The International Energy Agency report 'Net Zero by 2050' states that if we are to have a hope of limiting global warming to 1.5 °C then 'from today, no investment in new fossil fuel supply projects' can occur.

Gas developers should be required to explain how the extraction of fossil gas will help Victoria achieve the legislated interim Emissions Reduction Targets for 2025, 2030, and beyond, and net zero emissions target by 2050.

Risk assessments should not be limited to the regional economic, social, and environmental risks and impacts. The risks and impacts of climate change must also be included in all risk

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assessments, as the effects of climate change are global and extend well beyond the region of gas development.

The requirement in the Regulations for “minimisation, so far as is reasonably practicable, of the environmental, public amenity and safety hazards and risks involved in undertaking petroleum operations over the life of those operations” is insufficient. Hazards and risks must be required to be negligible.

Gas developers must be required to report regularly on environmental management plan compliance and on all gas emissions.

Sufficient rehabilitation bonds must be required to ensure bonds will cover the cost of managing impacts on both public and private land and the surrounding environment from gas exploration and extraction, in perpetuity where required.

Penalties for breaches of regulations must be in proportion to the risks accompanying the breaches and of a sufficient amount to provide deterrence to breaches. Penalties of 20 penalty units, which in 2021 is \$181.74 each, totalling \$3,634.80 for serious breaches of the Regulations, is grossly inadequate. Penalties should be scaled according to the seriousness, for instance to 2000 penalty units for serious breaches.

The assessment and approvals system is geared towards providing positive outcomes for companies wishing to mine for fossil fuels, whilst producing negative outcomes for communities and the environment.

It is essential that any amendment to the Petroleum Regulations include the ability for communities to express their opposition to mining and drilling in a meaningful way. Where there is a clear lack of social license for specific proposals, Earth Resources must be willing to refuse applications.

I will be following this process closely and look forward to seeing how community feedback is incorporated into state regulation of the industry.

Yours sincerely,
[Redacted]

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