

## Onshore Gas regulation submission

### *Introduction*

I am a concerned citizen, serious for Victoria to appropriately address climate change. I am a [Redacted].

In general:

1. Any regulation involving fossil fuels needs to be flexible due to the urgency of addressing climate change and need for resilience.
2. Often review the contextual situation with regard for climate impacts and aim for reduced demand for gas.

### *Managing environmental impacts*

The areas under consideration for onshore gas need to consider alternate requirements for the land or conflicting objectives of climate change mitigation and adaption plans:

1. In the RIS assessment all the environmental, social, and economic benefits need to be measured properly.

**Recommendation 1: Use the UK Government (2021) Dasgupta Review on biodiversity to measure the true worth of the biodiversity present and carbon store, whether it be on public land, or private.** This includes using an international recognised standard for measuring natural capital and carbon accounting. In tandem with this would be social and other benefits such as tourism and health impacts included.

2. Decision-making needs to include whether the land is required for climate adaptation and climate risk mitigation.

**Recommendation 2: Assess for potential role and value of the area under assessment as part of the Victorian Climate Adaptation planning and implementation. Include linkage to the Climate Adaption focus areas.<sup>1</sup>**

3. The land may be suitable for carbon farming markets.
  - a. Examples are engagement with private organisations for offsets including the Aboriginal Carbon Foundation<sup>2</sup> and Firesticks<sup>3</sup> for cultural burning.

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- b. As part of the Federal Emission Reduction Fund (ERF) for carbon abatement.<sup>4</sup>

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<sup>1</sup> <https://storymaps.arcgis.com/stories/a1571ecb3aef4d668ea663975aa339f1>

<sup>2</sup> <https://www.abcfoundation.org.au/>

<sup>3</sup> <https://www.firesticks.org.au/>

<sup>4</sup> <http://www.cleanenergyregulator.gov.au/ERF/Choosing-a-project-type/Opportunities-for-the-land-sector>

**Recommendation 3: Assess the land for alternate value for carbon farming markets and abatement.**

The Petroleum Act [the Act] states:

(c) fiscal regimes that offer petroleum explorers a fair return while benefiting all Victorians.

Therefore, the above recommendations are required to ensure the undertaking has a justified business case and to ensure that all Victorians will benefit in line with the Victorian Government's Climate Change Strategy<sup>5</sup> and Climate Change Act 2017.

**Recommendation 4: Identify climate strategy conflict impacts and do not approve exploration licenses where this occurs. Where this does not apply, review every 3 years to determine if this now applies and if so stop renewal of licenses.**

***Managing social impacts***

These need to cover health impacts.

**Recommendation 5: Plans and measurement of gas leakage needs to be performed and made real-time available to public stakeholders. This is to be included in implementation plans.**

**Recommendation 6: Undertake a health review of local communities every 3 years. This is to be included in implementation plans.**

***Economic assessment: Reduced demand and stranded asset risk***

Currently, the Victorian government is planning a Gas Substitution Roadmap that is expected to significantly reduce demand for domestic gas.<sup>6</sup> Under "petroleum rights", the 15-year potential viability needs examination by economists and scientists due to future climate risk and avoidance of stranded assets.

**Recommendation 7: Re-assess the commercial viability timeframe based on current knowledge and update every 3 years.**

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<sup>5</sup> <https://www.climatechange.vic.gov.au/victorias-climate-change-strategy>

<sup>6</sup> <https://engage.vic.gov.au/help-us-build-victorias-gas-substitution-roadmap>

***Land access arrangements***

The owner would need to be advised the alternate uses for their property and benefits for an informed decision.

**Recommendation 8:** The information from the RIS assessment and recommendations under *Managing environmental impacts* need then to be provided to the property owner.

***Compensation***

Compensation needs to include health costs should they be incurred from the gas exploration site.

**Recommendation 9: Compensation needs to include liability for health costs by the land owner, their occupants and local community attributed to incidents or gas leakage from the property. This includes poorly performed rehabilitation and decommission of the gas well site.**

***Implementation date***

There is only a short time between close of consultation September 3 and proposed implementation of the regulation. Outcomes on climate commitments out of COP26 have not been taken into account.

**Recommendation 10: Defer the implementation date to late 2022 due to the complex nature of these regulations and potential outcomes from COP26 being held in November 2021.**

Thank you for considering my submission

**References**

UK Government. (2021). The Economics of Biodiversity: The Dasgupta Review.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/962785/The\\_Economics\\_of\\_Biodiversity\\_The\\_Dasgupta\\_Review\\_Full\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf)