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Somers Residents Association Incorporated (“SRA”) is an incorporated, not-for-profit, voluntary organisation, consisting of approximately 300 financial members who all call Somers home in some way.

Located south-east of Melbourne on Western Port bay, Somers is off the main road and enjoys a quiet set of beaches in between Crib Point and Balnarring. We look across to Phillip Island, Flinders, Bass Strait and the nobbies. Surrounded by sea, wineries, farmland and nature reserves, Somers is both an attractive destination for holiday makers and an excellent place to live for those who value a lifestyle amongst nature. Somers is a special place that retains an essentially rural character.

The purposes of the SRA as set out in our Rules are “to preserve the character and amenity of the coastal village of Somers and to support proposals to enhance that character. To investigate concerns of residents about matters which may affect their safety, well-being or lifestyles. To support proposals toward preservation of the natural environment. To examine actions of Authorities, organisations or companies affecting residents. To investigate proposals by Local, State or Federal Governments affecting Somers. To represent all Somers residents in community matters.”

Many Somers residents are very concerned about the Crib Point Gas Import Jetty and Pipeline Project (“the Project”) and the SRA makes this submission on their behalf.

Having regard to the difficulties posed by the Victorian Government’s COVID-19 restrictions on consultations within our community, we look forward to receiving any further feedback from Somers residents in coming months and to making our Submission including any additional points at the Inquiry and Advisory Committee hearing process.

1. Is the Crib Point Gas Import Jetty and Pipeline Project required?

AGL Wholesale Gas Limited (AGL) and APA Transmission Pty Ltd (APA) (“the Proposers”) argue that the Project is required to meet a “projected” or “predicted” gas supply shortfall from 2024. The Proposers rely on AEMO’s predictions of potential issues in gas supply, but ignore the possible other factors at play as to whether or not gas supply to the area will actually be an issue.

Things have changed a lot during 2020, largely as a result of the effects of COVID-19 being felt across the world. Global oil and gas prices have plummeted in response to decreased demand, as well as Russia and Saudi Arabia engaging in a price war in order to push down the price of oil (having direct effects on the price of gas). AEMO has notably pointed to likely lower-than-expected levels of global LNG demand and domestic gas use because of the pandemic.¹

PM Scott Morrison and Federal Energy Minister Angus Taylor have also announced plans to capitalise on globally low oil and gas markets to boost industry, and reduce domestic energy prices.²

Current (other) gas projects under consideration include:

- Narrabri, NSW coal seam gas extraction by Santos, requiring NSW Government and Federal Government approval. The Federal Government is considering ordering that this supply be reserved for the domestic market.
- LNG import terminals on the NSW coast - Port Kembla and Port of Newcastle.
- LNG import terminal – Viva Energy (Shell) Geelong oil refinery, proposed to be repurposed after 65 years in operation.

In addition, Victoria's moratorium on conventional onshore gas exploration is to be lifted from mid-2021 (however, the ban on fracking and coal seam gas exploration in Victoria is to be enshrined in our State's constitution).

Australia is the world's biggest exporter of LNG, so we have the gas. The Federal Government is able to reserve gas to the domestic market, including from the voluminous LNG Gas Export Terminal in Gladstone, Queensland. Australia also has the pipeline infrastructure to move gas to where it is needed. We do not need to be shipping gas into pristine waters and world heritage listed environments like Western Port.

As more renewable projects come online, including investment in residential rooftop solar PV and battery-storage, the pressure on gas as a resource to fire electricity power stations will also become less. Particularly if the bushfires hit eastern Australia again this Summer, the community will move further away from non-renewable energy sources in favour of sustainability and protection of the environment. Indeed, Crib Point was hit with a fire 5 years ago this Summer, and that community will remember that scenario all too well. We have been forced to adapt our lifestyles to fight COVID-19. Victorians would simply use less gas if the alternative was risking ruining one of our last remaining pristine environments.

AGL is predominantly an energy retailer - their access to gas at global wholesale prices will not drive down retail end-user prices. Any difference will just go into AGL's directors' and shareholders' pockets, and fuel AGL as another major supplier in this space. Monetary fines and other available sanctions are not enough to invoke true responsibility for the environmental effects of this project. The available profits and power to AGL are just too high and will overpower any deterrence.

¹ <https://www.afr.com/companies/energy/gas-shortages-could-hit-vic-by-2024-aemo-20200326-p54e91>

² <https://www.smh.com.au/politics/federal/morrison-prepares-a-gas-plan-to-boost-economy-out-of-the-pandemic-20200807-p55jop.html>

In short, the project is not required for Western Port. There are plenty of viable alternatives that would not ruin relatively untouched environmental sanctuaries. AGL could perhaps join in one of the other proposed projects listed above to achieve its own real objectives.

2. Why Western Port? Land and waters of significant pristine beauty and importance

Do the Proposers really appreciate how pristine and beautiful Western Port really is?

As a community, we love and care for our natural environment. We love the resident dolphins like they are our pets. We snorkel, paddle board, sail and kayak enjoying the sea and bird life that is Western Port, whilst respecting this incredible natural environment. We look out across the water and feel so lucky to be privy to one of the last untouched areas on this planet. We feel peace in our bones as a result. Western Port is part of us.

The EES is very much a part of the proposal for the project and is written with a slant of progress and all will be well. Query the objectivity of the technical experts engaged, or perhaps they were just not given enough of a brief by the Proposers to really consider the possible and probable environmental effects. Clearly, the Proposers and technical experts do not fully appreciate how pristine Western Port actually is.

There are real risks to the ecosystems of Western Port and surrounds, including the ecology of the marine environment and the vast and productive mangrove forests. At its simplest, the effects of “wash” (waves) from the huge tankers coming and going will affect the area. There are also the obvious impacts on fish breeding and stress to this ecosystem. Fish larvae and other small organisms are acknowledged in the EES as being threatened (a real concern) but the mangroves largely overlooked. Noise has also been inadequately considered (including, importantly, the effects of underwater noise and vibration) and the effects will only really be known if the project is under operation.

Crib Point is positioned amongst the most southerly occurring mangrove forest in the world. These mangroves are the backbone of the bay and essential for fish breeding and feeding, water filtering, and climate control via their effects on CO₂ levels. They influence much of the marine life and diversity in the bay. Western Port, including all of these mangroves, has been identified as an area to be protected by the Ramsar Convention on Wetlands of International Importance. Western Port is also a UNESCO Biosphere Reserve and there are many internationally protected species.

The thought of allowing huge quantities of chlorinated wastewater to be expelled into Western Port each day, and at possibly vastly different temperatures, is unfathomable. Possible destruction of the mangroves, marine life and associated ecosystems would surely have a massive effect at Somers and around Western Port and also contribute to global warming.

Things can and do go wrong. Risks are not necessarily foreseen and effects are not always avoided/minimised/managed. All this in the context of another possibly extreme bushfire season on its way and incredible stress to multiple communities from COVID-19... None of us foresaw or planned for any of that.

There are far better ways to address any perceived “need” for this project.

Thank you.