



Viva Supplementary EES Submission Guide

Viva Energy is pushing ahead with their proposal to build a floating gas import terminal in Corio Bay, Geelong. The company has submitted a revised environment statement – and **submissions are due Thursday 24 October**.

We've pulled together this assessment on behalf of the Geelong Renewables Not Gas Alliance, which includes ACF Geelong, Environment Victoria and Geelong Sustainability.

Now's the time to have your say – please read through the guide and make a quick submission **before 11:59 pm on Thursday 24 October**.

What's this about? (Background)

A couple of years ago, Viva Energy put forward a proposal to build a huge floating gas terminal in Corio Bay, which would import large amounts of gas into Victoria – the equivalent of up to 600,000 tonnes of climate pollution.

In March 2023, the Victorian Planning Minister announced that Viva Energy's environment statement for the project had serious deficiencies – sending them back to the drawing board to redo crucial studies on marine ecology, noise impacts, air pollution and cultural heritage.

Now Viva Energy has come back with new studies, prompting a 'supplementary' Environment Effects Statement. Which means the community has to check their homework all over again – and make more written submissions to the inquiry.

We know not everyone has time to read through thousands of pages of highly technical scientific data 😊 So we've worked with academic experts to identify and summarise the issues, which you can reference for your quick submission.

How to make a submission

1. Open up a text-editing document like MS Word
2. Read through this webpage, noting things that concern you
3. Turn that information into a short letter addressed to the 'Inquiry and Advisory Committee'
4. Open up this government survey in your web browser:
<https://engage.vic.gov.au/project/Viva-Supplementary-EES-IAC/survey/5276#sub-nav>
5. Tick the privacy/consent boxes, fill in your details
6. Copy and paste your submission into the text box (less than 500 words) or upload as attachment

(image below)

Submission

How would you like to make your submission? Required

You may select both options.

- I would like to enter it into a textbox
- I would like to upload it as an attachment

Add your Submission Required

Type your submission into the text box. If your submission is more than 500 words, please upload your submission as an attachment by selecting that option above. If you are attaching a document and not using the text box, please either unselect this option or write "see attached submission" in the box below (otherwise your submission form will not submit). Important: Please do not include personal information in your submission that could identify you or other individuals, such as email and phone details or photographs, unless you (or they) consent to that information being publicly available.

7. Tick if you want to appear at the Hearings (e.g. give evidence in person or over Zoom)
8. Submit

What to include in your submission

Begin by introducing yourself and why you care about this issue. If you live in or nearby Geelong, regularly visit Corio Bay, or have some other connection to the area, you should mention that.

Keep the language polite and reasonable. You don't have to be an expert, just a concerned citizen. The following might be useful information.

General community concerns

- **Safety:** Corio Bay is not an appropriate location for a gas terminal. It is too close to 30,000 residents, recreational & commercial Bay users. The shipping channel is not wide enough to accommodate large LNG tankers if something goes wrong, and Viva Energy hasn't modelled what would happen if there is an incident or spill. Viva is also yet to release a navigational and safety risk assessment.
- **Recreation:** Viva Energy's proposal would double the area of the recreational boating exclusion zone around the refinery jetty, removing access to fishing grounds.
- **Visual impact:** LNG ships are 300 metres long and 49 metres high (for locals, that's longer than Cunningham Pier, and taller than the Giant Sky Wheel near Eastern Beach).
- **Cultural heritage:** Impacts to Aboriginal cultural heritage are still unknown as Viva has not provided the Cultural Values Assessment as directed by the Minister.
- **Climate change:** Gas is a polluting fossil fuel. The Viva Energy gas terminal would import enormous amounts of it, responsible for 600,000 tonnes of carbon pollution per year. Locking in high gas use for decades is inconsistent with Victoria's climate targets. A smarter alternative is government action to help people switch to efficient electric appliances – like reverse cycle air con for heating – instead of expensive imported gas.
- **Marine environment:** Corio Bay is a unique marine environment, different from the broader Port Phillip Bay, and home to an internationally significant Ramsar wetland close to the proposed location for this gas terminal. Further details on marine environment concerns are below.

Specific concerns

Dredging could be much larger than the estimated amount. A typical LNG tanker ship is 300 metres long and 43 metres wide. The bottom extends 12 metres underwater. The Geelong Channel is 11.9 metres deep *with tide* and 10.6 metres deep *without tide*. The channel is not deep enough for a 'typical' LNG ship and will need to be dredged. Rival LNG company Vopak [rejected Corio Bay as a location](#) (paywalled \$) for a gas import terminal due to concerns about significant dredging and marine impacts. We consider that the monitoring

of dredging impacts in Viva's proposal is not consistent with the Victorian Dredging Guidelines.

Insufficient baseline monitoring done. Viva Energy already operates a refinery, which dumps 'wastewater' into Corio Bay. For this EES, they were asked to do a better job estimating the environmental impacts of this existing wastewater. We have many concerns about these new studies, including:

- Insufficient details on chlorine plumes.
- Marine surveys have not been carried out over a full annual time period to account for different species life cycles and seasonal variability.
- The monitoring of dredging impacts on seagrass has not been done adequately with further assessment required.
- The science is highly subjective and does not show existing values and impacts.
- Field surveys were poorly designed or not enough surveys were done to give an accurate representation of baseline knowledge and therefore impact.

The impact on seagrass is not measured properly. The ecology of Corio Bay is highly dependent on seagrasses. Nitrogen is mostly sourced from microbes associated with seagrass roots. Even when storms or grazing birds detach seagrass leaves, they tend to stay within the bay. It's a different environment to broader Port Phillip Bay, and this hasn't been adequately accounted for. We have the following concerns:

- Seagrass distribution is not adequately mapped.
- Some analysis uses a 'generic' seagrass category rather than individual species, which biases the outcomes.
- The areas impacted face East and are sheltered from prevailing wind and waves, but the reference sites face South West and are exposed.

There is no safe threshold for air pollution. Along with greenhouse gas pollution from burning gas, potential methane leakage and dredging, we are concerned about Volatile Organic Compounds (VOCs), which can lead to the formation of secondary air pollution in the area. There is no safe threshold for air pollution exposure, as supported by numerous epidemiological studies. The monitoring station is located in South Geelong and may not accurately capture the variations in air quality around North Shore.

Lodging your submission

Have you drafted your submission? Great! Follow this link to the government survey <https://engage.vic.gov.au/project/Viva-Supplementary-EES-IAC/survey/5276#sub-nav>

Important: if you have a bit to say, or feel passionate about this issue, tick the box to appear at the Hearings (see image).

Hearing preferences

Do you wish to become a party so you can participate in and speak at the Public Hearing? Required

The Hearing may be convened in person or by video conference. Parties will be advised of the arrangements in advance of the Hearing.

Yes

No

Next steps

Thank you in advance for making a submission! Submissions will be made public later on in November or December. The inquiry hearings will begin on 9 December, and we're expecting the Planning Minister to make a decision in the first quarter of the new year. We'll keep you updated on progress via email and social media - stay tuned!

If you would like a Geelong Renewables Not Gas campaign coreflute sign for your fence or a bumper sticker, please send a request to secretary@acfgeelong.com

Questions

Got questions about the campaign? Email one of the lead groups involved:

ACF Geelong president@acfgeelong.com

Environment Victoria action@environmentvictoria.org.au

Geelong Sustainability info@geelong sustainability.org.au