

# Crib Point IAC presentation

Phillip Island Conservation Society (submitter 2915)

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Jeff Nottle & Jane Jobe

*PICS acknowledges and pays respect to the region's first people, the Bunurong and Boon Wurrung, part of the Kulin Nation, who are the traditional custodians of these lands and waters.*

# Introduction

- PICS: Protecting and conserving Phillip Island & Western Port since 1968
- Today, we'll cover:
  - PICS position re Crib Point gas import project
  - Phillip Island context
  - Ramsar context
  - Key environmental concerns

# PICS position

- Strongly oppose the project—environmental, economic, and social grounds
- Inconsistent with community vision—biodiversity conservation, sustainable development, carbon neutrality
- No credible rationale
- Uncertainties and risks of unacceptable environmental damage not addressed
- The project should not proceed

# Phillip Island context

- Second-most tourism dependent economy in Australia
- Nature-based: penguins, seals, shearwaters, whales
- Our environment is our economy
- We need to preserve and enhance it

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**Demand for food relief soars**  
PICAL responds with community help

Greg Thompson, centre manager at PICAL said the local community response to the Coronavirus pandemic has been "incredible".

When restrictions and lockdowns were introduced in March, he said demand for food from the Phil Dixon Pantry soared.

While State and Federal governments were pouring money into the larger, more well recognised food relief organisations, Greg said the money wasn't coming out at the bottom, with neighbourhood houses and community centres "not seeing a cent".

At the same time, calls for assistance increased dramatically, with PICAL's food bill jumping to \$3000 per month.

Since March, he said PICAL has provided 5000 frozen meals to vulnerable people in the community and is now the largest provider of emergency food relief in the South Gippsland area.

"Our entire community just banded around this service gap, to make sure food was available to the most needy in our society," he said.

A group of volunteers, under the very capable leadership of Steph Thornborrow, came together to cook, package and help distribute the meals.

"Bass Coast Council provided free use of the commercial kitchen at the Cowes Cultural Centre for the volunteer cooking program," Greg said.

"With many local cafes and restaurants closing during the lockdowns, some offered their kitchens and cooking staff to assist in our cooking program. The biggest of these was the CVC Adventure Resort, which has provided nearly 2000 meals in the last three months.

"Other organisations and individuals in our local community, including Phillip Island Lions Club, Phillip Island Rotary Club, Heard of Cowes Butchery, The Island Grocer, Phillip Island Community Orchard, Bass Coast Landcare, Bimbadeen Farm, Master TV Audio-Visual, local supermarkets and many others have also been regularly donating fresh produce for our cooking programs and emergency relief food hampers.

"In addition to our own volunteer drivers, the congregation from Cowes Baptist Church were also home-delivering emergency food hampers.

**Our visitors are back!**

# Phillip Island context

- No social or economic impact assessment
- Deep anxiety, grief and opposition to the project

**Island economy, jobs trump AGL gas: shire**

**AGL gas plans ignore social, human impacts: psychologist**

Source: Phillip & San Remo Advertiser



*The potential for economic loss is significant when Phillip Island is "so heavily reliant on nature-based tourism".*

**Phillip Island tourism  
at risk from AGL project**

**AGL bay project could be “catastrophic”**

**No confidence in AGL plans: barrister, experts**

**AGL bay project will kill fish populations: anglers**

**AGL dismissive of safety risk: councillor**

**“Shonky maths” used to calculate whale collisions**

**Phillip Island will be “massively” impacted by gas “factory”**

Chlorine discharge  
in bay is legally  
unprecedented: EPA

Source: Phillip & San Remo Advertiser

# Ramsar context

- Obligation to maintain the Western Port Ramsar ecological character
- Port operations are listed as a threat in the ecological character description
- The Crib Point project is a major intensification of port-related pressure
- At some point, cumulative effects mean new projects should not proceed
- There needs to be a proportionate intensification in risk management

# Crib Point project: key environmental concerns

- Spills
- Marine pests
- Entrainment and fish
- Light pollution and birds
- Whales

## Whale collision risk increased with bay “gas factory”

Southern right whales would be under threat from AGL's proposed gas project in Western Port, according to the Phillip Island Conservation Society.

PICS members have been wading through AGL's 10,000-page Environment Effects Statement (EES), with submissions due August 26, concluding the company has failed to properly address the potential for whale strike in Western Port.

"We believe the AGL response to the threat to whales is not nearly adequate and southern right whales that only exist in the southern hemisphere are particularly under threat," said PICS president Jeff Nottle.

"AGL appear to have not even considered the Conservation Management Plan for the southern right whales."

Mr Nottle said the whale species were protected both federally and internationally and the management plan highlighted they were particularly at risk from vessel collisions in the southern hemisphere.

He added they were also a growing part of Phillip Island's tourist economy.

"When whales are under threat it not only adversely impacts the ecosystems it also impacts our eco-tourism," Mr Nottle said.

"PICS believes this is another illustration that we will be hearing the



Southern right whales off Phillip Island credit: Lisa Shonberg. "When whales are under threat it not only adversely impacts the ecosystems it also impacts our eco-tourism."

AGL's plans would see liquefied natural gas transported on up to 40 LNG super tankers – about 300 metres long and 49 metres wide – per year from interstate and overseas.

The FSRU would be approximately 300 metres long by 50 metres wide with capacity to store 170,000 cubic metres (m<sup>3</sup>) of LNG.

AGL's EES states "a few whales visit Western Port during their seasonal migrations".

"These same whales are at risk of whale strike from thousands of ships and recreational vessels in Bass Strait waters and tens of thousands of vessels in Australian waters generally.

"The increase in likelihood of strike of whales resulting from the addition of up to 40 LNG carriers to the existing and future shipping traffic in these areas is not significant."

The EES states Western Port is not recognised as a meeting point or breeding area for humpbacks, southern rights or killer whales, and most visits to Western Port Bay are "usually the result of general wandering from the main migration paths".

It says the Port of Hastings currently has about 150 vessel movements per year.

"Large vessels, such as the proposed LNG Carriers, are the vessel type with the lowest recorded number of whale strikes – even less

Source: Phillip & San Remo Advertiser

# Spills

- Increased spill risk—oil, diesel, fire foams
- Spill consequences potentially catastrophic
- Not possible to acceptably mitigate this risk, so the project should not proceed
- At minimum, a more thorough risk assessment, updated emergency response plan, and funding for augmented response capacity is required

# Marine pests

- Increased risk of infestations
- High priority threat to ecological character
- Increased effort is required to manage the risk before the project proceeds
  - Baseline study
  - Monitoring and response plan that requires eradication of infestations
  - Funded for life of project

# Entrainment and fish

- Western Port fish nursery—critical component of ecological character
- Peak entrainment will occur in the month of peak fish egg abundance (Aug)
- There is no method to determine the species that will be entrained
- The proponent has under-estimated entrainment
- We do not have Ramsar “limits of acceptable change” for fish in Western Port
- There is a knowledge gap re fish spawning in Western Port

# Entrainment and fish cont.

- Uncertainties and potential for significant damage—project should not proceed
- At minimum, the project should not proceed without:
  - Further sampling of fish eggs and larvae to confirm seasonal abundance
  - Further analysis of the extent of egg and larvae entrainment
  - Use of the results to refine entrainment mitigation (EPR ME02)
  - Assessment of projected loss of mature fish and ecosystem effects
  - An adaptive monitoring program

# Light pollution and birds

- Birds, including the Short-tailed Shearwater, are a critical component of ecological character
- Short-tailed Shearwater is abundant in Western Port (approx. 250,000 birds)
- Fledglings are highly vulnerable to artificial light sources as far as 20 km away
- Detailed lighting design should have been completed before EPBC and EES referral to enable adequate risk assessment

# Light pollution and birds cont.

- Before the project proceeds further:
  - A detailed lighting design that meets minimum safety and security requirements must be assessed for shearwater impact assessment
  - Sky glow must be modelled
  - Local shearwater experts must be consulted
- If the project proceeds, the Crib Point facility must be monitored for grounded birds to enable adaptive management

# Whales

- Whales enter Western Port each winter, which coincides with peak gas demand and shipping. The project should not proceed without:
  - Improved vessel strike mitigation measures, including funding for marine observers and acoustic receivers, revision of port and harbour master documents, and lower speed limits when whales are present
  - Fully addressing the threats in the SRW conservation management plan

# Conclusion

- The project would degrade Western Port and damage our communities
- It must not proceed
- Thank you

## In support of Western Port

In the decade Dr Laura Brearley and her husband Terry Melvin have lived on Phillip Island, they have become known as a dynamic duo. Laura co-founded the Shearwater Biyadin Festival eight years ago, then in 2018 she established the intercultural arts program of the Whale Festival. Laura is also co-ordinating an environmental arts project, Coastal Connections, funded by Bass Coast Shire, which is focussing on "special places in the natural world that local community members love". In their spare time, Laura - a musician and researcher - and Terry a film maker, photographer and former psychologist - have most recently compiled a series of four films dedicated to Western Port bay. Available on their YouTube channel, the films were initially inspired by the couple's walks in the first COVID lockdown, capturing on video the bay's beauty. "The star of the film is Western Port itself and the many beautiful

Environmental Effects Statement for the gas project. "We have a special love for the birdlife and the peace of Western Port. It is that love that led to our decision to develop a creative submission for the Save Westernport from AGL campaign," she says. "We strongly believe that Western Port's eco-system is too fragile and significant to risk the damage that AGL's project would cause." The entire film project has been a massive undertaking, almost a full-time project for Terry, while Laura wrote four songs used in the films, also acting as narrator. The couple harnessed the talent and knowledge of about 50 contributors including Phillip Island residents, musicians Lyndal Chambers and Brian 'Strat' Stratting and members of the Gippsland-based Climate Calamity Choir, led by Jane Coker, and the Melbourne Climate Choir, led by Jeannie Marsh. Given the second lockdown, the choir performed on Zoom in the



Source: Phillip & San Remo Advertiser