

**CITY OF GREATER GEELONG**

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Attention: Inquiry and Advisory Committee

**Re: Environmental Effects Statement for the proposed Viva Gas Terminal Project**

The City of Greater Geelong (the City) is pleased that the Victorian and Australian governments have determined that the Viva Gas Terminal Project will require an Environmental Effects Statement (EES) under the *Environment Effects Act 1978* and the *Environment Protection and Biodiversity Conservation Act 1999*. It is appropriate that this project is tested by both levels of government which allows the community the opportunity to provide feedback.

The City, represented by its manager of City Development, has been a member of the Technical Reference Group (TRG) and has provided advice regarding statutory planning matters. The City is making a detailed separate submission regarding the draft planning scheme amendment which forms part of the project.

The City, through extensive consultation, has developed a vision to be a clever and creative city-region that is forward looking, enterprising and adaptive, which cares for its people and the environment. Given this context, and as the level of government closest to the community, we feel that we have an important role to share with the IAC the variety of views we have heard from our community regarding the proposal.

Given the size and complexity of issues raised in the EES, which is contained across several volumes and thousands of pages, the City is keen for as many community members as possible to have their say on the proposal. We therefore suggest that a proactive grass-roots stakeholder engagement process be undertaken by the State with the feedback to become a key pillar for this evaluation process.

In early 2021, the City established a Sustainability Advisory Committee - consisting of interested community members and industry representatives - to engage with the Council on sustainability topics. The purpose of the committee is to draw upon local expertise, experience, and networks to inform Council decision-making by providing a formal pathway created to collect community and stakeholder input, regular feedback, and recommendations. The Sustainable Advisory Committee has reviewed the EES and have

provided feedback to our Councillors and this sentiment is included within the community feedback provided.

As is the process with the EES, the proponent prepares this document. Some members of the community have represented to us that the EES has been prepared to favour of the project and omits a broader global environmental view.

We also acknowledge some members of the community voicing to us that they are supportive of the proposal.

We are appreciative of the community and Sustainability Advisory Committee for raising their concerns regarding the proposed project which the City encourages the IAC to appropriately consider:

### **1. Safety**

Whilst Viva is an experienced operator of a major hazard facility, there has been considerable community feedback regarding safety. This includes increased risk of collision, massive explosion, frequency of gas container shipping, widening of exclusion zones in shipping channels, possible terrorist activity and consequent armed close protection of gas container shipping. There are substantial added risks for nearby residents, businesses, ferries, other shipping, and community general health and wellbeing.

### **2. Local Amenity**

Whilst the City acknowledges the proposal location is within a developed Port and Industrial area, it is also closely located to sensitive uses such as residential housing and school grounds like Geelong Grammar. Community feedback is that the proposal will increase the frequency of heavy vehicles in this area and increase both noise and air pollution in this area.

Impacts on the visual amenity of this and surrounding areas have been raised, particularly with respect to vistas from the Geelong Waterfront, a major tourism destination, and the Spirit of Tasmania terminal, currently under construction.

Consideration of the local community's use and enjoyment of the waterways and likely impacts on fishing, boating and water sports, and related repercussions to local business and tourism operators is also sought.

### **3. Sustainability and Greenhouse Gas Emissions**

Our Council, through the adoption of the Climate Change Response Plan, has set a target of net zero emissions in Greater Geelong by 2035. The net zero target is consistent with current science and needs a coordinated and collective response from the whole community. This requires an increase in renewable energy production, the rapid phasing out of fossil fuels and conversion to appropriate heating and industrial infrastructure.

The community has told the City that the analysis on sustainability and greenhouse emissions should not just be directly analysed regarding the project but should also consider the impact of the proposal on the broader region. Questions have been raised by the community that the assessment and impact outlined in the EES may be significantly undervalued, and that the true impact would be higher than that stated, if a broader, and more appropriate analysis was undertaken. This would include fugitive

emissions from mining, transport emissions, fracking, and the diverse costs of sourcing gas (as reported) from overseas.

The community has also advised the city of the latest IPCC and UN increased urgency in reports advocating rapid phase out of fossil fuel energy.

#### **4. Marine Environment**

As noted in the ESS the proposed gas terminal is proximate to a Ramsar wetland and its habitat. The community has raised, and the City agrees, that it is vital the wetland and Corio Bay flora and fauna be protected and preserved. The community has also raised concerns regarding the release of chlorinated water into the bay and the impacts this will have on seagrasses, habitat and to nearby Ramsar Wetlands.

#### **5. Land Local Environment**

Whilst Viva notes that its goal will be to avoid, minimise and/or offset potential adverse effects on land, surface water, groundwater resources, native flora and fauna and their habitats, the community is seeking reassurance that any impacts are avoided or minimised. Offset of any impact is not appropriate given the significance of the habitat of the area and the importance of these assets to current and future generations.

#### **6. Changes to Refinery Pier**

As noted in the EES, the significant works proposed to Refinery Pier will require localised dredging. Whilst we note that dredging is a routine part of port maintenance and operations, the community has raised concerns that this be managed to the highest standards in line with the National Assessment Guidelines for dredging, and shipping channels.

#### **7. Social and Economic Benefits**

The City welcomes major investment by Viva in its Geelong operations. Viva is a major employer within the region and this proposal, along with the recent announcement regarding the investment into a hydrogen service station on its site, gives optimism for its future growth. Whilst we welcome investment, the community is aware that the current proposals do not have a significant long-term impact on local employment levels. Geelong, through Viva and other investments, is well placed to be a leading energy hub with a long-term focus on renewable energy with consequential substantial increase in local renewable energy industries and employment.

#### **8. Aboriginal and Cultural Heritage**

It is imperative that the Registered Aboriginal Party has ongoing engagement throughout the life of the project, in addition to the Cultural Heritage Management Plan.

Our councillor group welcomes a balanced and thorough analysis of all elements of the Environmental Impact Statement and feedback provided broadly through the process and as outlined above by our community and Sustainability Advisory Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Trent Sullivan', with a stylized flourish at the end.

**CR TRENT SULLIVAN**  
**DEPUTY MAYOR**  
**CITY OF GREATER GEELONG**