

To: Resources Victoria

8 September 2025

Petroleum exploration permit tender

Thank you for the opportunity to provide feedback on the two petroleum exploration permit tenders proposed for the Gippsland and Otway basins.

About Environment Victoria

Environment Victoria is the leading not-for-profit environmental advocacy organisation in Victoria. With 96 grassroots member groups and over 200,000 individual supporters, we've been representing Victorian communities on environmental matters for over 55 years. Through advocacy, education and empowerment, Environment Victoria seeks significant and enduring solutions that will safeguard the environment and future wellbeing of all Victorians.

Introduction

The consultation flags two areas for exploration:

- In the Otway basin, 52 km² offshore from the Bay of Islands Coastal Park between Warrnambool and Peterborough, in Eastern Marr Country.
- In the Gippsland basin, 199 km² onshore around Jack Smith Lake south of Seaspray in Gunaikurnai Country.

The consultation also notes that seismic blasting would be allowed, although companies would be encouraged to use existing data.

Seismic blasting is an unacceptable practice

Seismic blasting uses underwater airguns to produce blasts of up to 240 decibels, which is more than 10,000 times the *maximum possible* sound pressure level travelling through air (194 decibels). There is clear and growing evidence that seismic blasting permanently and cumulatively harms a very broad range of marine life.

Seismic blasting causes temporary and permanent hearing loss, abandonment of habitat, disruption to mating and feeding, beach strandings, and even death, to whales, dolphins and seals.¹ The Otway basin provides important habitat for such animals including protected sanctuaries for blue whales,

¹ RP Koper and S Plön, 'The Potential Impacts of Anthropogenic Noise on Marine Animals and Recommendations for Research in South Africa' (Endangered Wildlife Trust, 2012), <https://biblioteca.biofund.org.mz/wp-content/uploads/2018/11/1542889906-F1727.Ewt%20Research%20&%20Technical%20Paper%201%20-%20Koper%20&%20Plon%20-%20Ocean%20Noise%20Pollution.Pdf>.

southern right whales, and their calves. Seismic blasts also kill shellfish and zooplankton and cause significant and lasting damage to lobsters and octopus.² Even studies funded by seismic blasting companies have found uncontrollable impacts and have been unable to determine a safe operating distance for seismic blasting.³

Unsurprisingly, communities strongly oppose seismic blasting. Recent consultations on seismic blasting proposals for the Otway basin attracted 50,000 submissions from community members.⁴ Multiple local councils in coastal Victoria, including Moyne and Glenelg, have voted to oppose seismic blasting.⁵

Seismic blasting does not have social licence. Our message to the Victorian government is that it should be banned – and it certainly should not be allowed in relation to these exploration permits.

Gippsland's water is under increased pressure

Conventional onshore gas development was restarted based on findings of the Victorian Gas Program, despite the fact that Program's studies of groundwater impacts found that even low levels of gas extraction would cause levels of groundwater to decline, beginning in six to 18 months and lasting up to 30 years.⁶

In the time since the Victorian Gas Program studies were completed, the pressures on Gippsland's water systems have only increased, meaning that additional precaution and understanding is warranted. Currently, coal miners are seeking new 30-year water entitlements for mine rehabilitation that if approved will result in significant net loss to West Gippsland rivers. In addition, the latest Victorian Climate Science Report found a long-term drying trend is likely for the region.⁷

² Ryan D Day et al., *Examining the Potential Impacts of Seismic Surveys on Octopus and Larval Stages of Southern Rock Lobster - Part A Southern Rock Lobster* (Fisheries Research and Development Corporation, 2021), <https://www.frdc.com.au/sites/default/files/products/2019-051-Examining-potential-impacts-of-seismic-PART%20A-SRL-larval-stages-15July2021.pdf>; Robert D. McCauley et al., 'Widely Used Marine Seismic Survey Air Gun Operations Negatively Impact Zooplankton', *Nature Ecology & Evolution* 1, no. 7 (2017): 7, <https://doi.org/10.1038/s41559-017-0195>.

³ Day et al., *Examining the Potential Impacts of Seismic Surveys on Octopus and Larval Stages of Southern Rock Lobster - Part A Southern Rock Lobster*; Ryan D Day et al., 'Physiological and Behavioural Effects of Exposure to a Commercial Seismic Survey on the Pale Octopus, *Octopus Pallidus*', paper presented at OceanNoise 2023, Barcelona, *Programme & Abstract Book*, 2023, <https://2023.oceanoise.com/wp-content/uploads/2023/05/Abstract-booklet.pdf>.

⁴ 'Port Fairy Has Seen off Energy Developers before. Jock Serong Is Part of the Community - He Shares What It's Been Like', *ABC News*, 12 June 2024, <https://www.abc.net.au/news/2024-06-13/jock-serong-port-fairy-big-weekend-of-books/103947438>.

⁵ 'Council to Oppose Seismic Testing', accessed 2 September 2025, <https://www.moyne.vic.gov.au/News-and-media/Council-to-oppose-seismic-testing>; 'Shire Moves Motion Opposing Seismic Testing in Otway Basin', 24 April 2024, <https://www.standard.net.au/story/8604146/glenelg-shire-council-calls-for-seismic-testing-moratorium/>.

⁶ M Hocking et al., *Gippsland Groundwater Model (GGM v1.1) Groundwater Impact Assessment - Conventional Gas Scenarios, Onshore Gippsland Basin, Victoria*, Victorian Gas Program Technical Report (Geological Survey of Victoria, 2020).

⁷ Victorian Government, *Victoria's Climate Science Report 2024* (2024), <https://www.climatechange.vic.gov.au/victorias-changing-climate/Victorias-Climate-Science-Report-2024.pdf>.

Most of the proposed area in Gippsland has already been assessed as unsuitable for gas

The Victorian Gas Program included a land use assessment of West Gippsland. It found that most of the proposed Gippsland exploration area is classified “Extremely Constrained” due to the Jack Smith Lake Wildlife Reserve, Mullungdung State Forest and other areas, “Highly Constrained” or “Very Constrained” (Figure 1).

The last use assessment was conducted prior to the establishment of the Victorian Transmission Plan and Renewable Energy Zones. If the Gippsland Shoreline Renewable Energy Zone is overlaid, only “Extremely Constrained” areas are left.

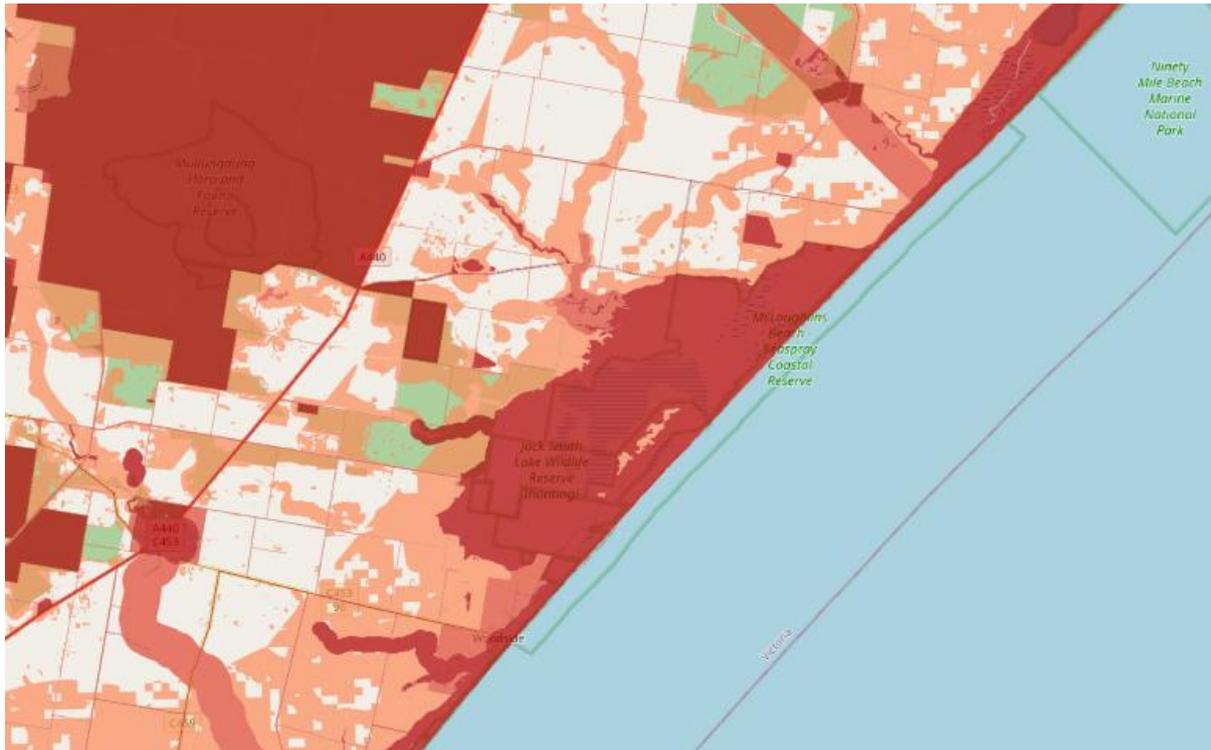


Figure 1: Otway Basin proposed exploration permit area with extremely, highly and very constrained areas shaded in reds. Source: Victorian Gas Program (2021) Resource land use planning model - Gippsland Basin.

New gas is not compatible with a safe climate

Meeting Victoria’s climate targets requires a transition off gas. We note that the Victorian government attempted to justify its decision in 2020 to overturn the moratorium on onshore conventional gas on the basis of climate pollution – by ignoring 88 percent of emissions in the gas supply chain.⁸

In reality, the opening up of new Victorian gas fields is incompatible with climate action. The Intergovernmental Panel on Climate Change (IPCC) are clear about this, stating that existing fossil fuel infrastructures already exceed the carbon budget for 1.5 °C, and existing and planned fossil fuel infrastructure have already used up the carbon budget to limit global heating to 2 °C.⁹

⁸ Mark Ogge and Tom Swann, *Emissions from Onshore Gas in Victoria* (The Australia Institute, 2020), <https://australiainstitute.org.au/wp-content/uploads/2020/12/P891-Victorian-Onshore-Gas-Emissions-Briefing-Note-Web.pdf>.

⁹ Intergovernmental Panel on Climate Change, ‘Summary for Policymakers’, in *AR6 Synthesis Report: Climate Change 2023* (2023), <https://www.ipcc.ch/report/sixth-assessment-report-cycle/>.

Gas companies also can't be trusted to manage or report their emissions. Recently it is alleged that ConocoPhillips, which is part of the consortium currently drilling in the Otway basin, covered up a massive, 18-year methane leak at its liquefied natural gas (LNG) export hub in Darwin.¹⁰ Under-reporting of leaks and methane emissions is systemic within the gas industry and compromises climate pollution reduction targets worldwide.¹¹

We have better alternatives to gas, and Victorians need certainty

Victoria is quickly moving away from gas due to the wide availability of better and more affordable alternatives. Most gas consumed in Victoria is wasted in inefficient activities such as space heating and water heating – activities which can be done much more affordably and using far less energy to achieve the same outcome using efficient electric technology.

Victorian businesses and householders still need to understand that our energy system is changing rapidly and they need to make plans to electrify now, before the gas companies cut and run, as is already happening.¹² Exploration for new gas only serves to send confusing market signals and risks leaving people stranded.

We would be pleased to discuss any aspects of this submission in more detail should you wish.

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¹⁰ Josh Robertson et al., “Huge” Leak from Gas Plant Kept Secret from Public in “National Scandal”, *ABC News*, 31 August 2025, <https://www.abc.net.au/news/2025-09-01/methane-leak-darwin-Ing-plant-kept-secret-from-public/105692718>.

¹¹ Kevin J. Kircher, ‘Accounting for Methane from Natural Gas Infrastructure in United States Greenhouse Gas Emission Estimates’, *Energy Policy* 206 (November 2025): 114747, <https://doi.org/10.1016/j.enpol.2025.114747>.

¹² Kat Lucas-Healey, *Putting Gas Companies in Charge Leaves Communities Unprepared*, 7 August 2025, <https://environmentvictoria.org.au/2025/08/07/putting-gas-companies-in-charge-leaves-communities-unprepared/>.