

To: Department of Industry, Science and Resources

19 February 2026

2025 Otway Offshore Petroleum Exploration Acreage Release

We appreciate the opportunity to provide feedback regarding the proposed petroleum acreage release within the Otway Basin.

About Environment Victoria

Environment Victoria is the leading not-for-profit environmental advocacy organisation in Victoria. With more than 40 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

This consultation invites input on potential impacts from releasing new petroleum exploration acreage in the Otway Basin. The stated intent of the consultation is to inform the Offshore Petroleum Joint Authority's decision whether to offer a permit to an applicant, noting that the Joint Authority has already decided, without consultation, to release Otway Basin acreage.¹

The Commonwealth government's Future Gas Strategy (FGS) has already been heavily criticised – it is a plan for climate chaos that reads as though it was written by the gas companies.² Even under the principles of the gas industry aligned FGS, this proposal to release new acreage for exploration cannot be justified.

¹ "2025 Otway Offshore Petroleum Exploration Acreage Release: Nominated Areas for Comment - Department of Industry, Science and Resources." Accessed February 12, 2026. <https://consult.industry.gov.au/2025-otway-offshore-petroleum-acreage-release>.

² Australian Conservation Foundation. "Gas Strategy a Blueprint for Climate Chaos: ACF." Accessed February 16, 2026. <https://www.acf.org.au/news/gas-strategy-a-blueprint-for-climate-chaos>.

The new acreage goes against international consensus on climate action

The FGS states that “Australia is committed to supporting global emissions reductions to reduce the impacts of climate change and will reach net zero emissions by 2050.” This commitment is simply not consistent with the release of new acreage.

In 2025 the International Court of Justice ruled that countries are legally obliged to prevent harms caused by climate change and that this obligation extends beyond treaties such as the Paris Agreement.³ This ruling originated from work done by law students in Vanuatu – our neighbours.

Furthermore, only late last year Australia joined the Belém Declaration to Transition Away from Fossil Fuels which commits countries to a just, orderly and equitable transition away from coal and gas, consistent with limiting average global heating to 1.5 degrees.

The Intergovernmental Panel on Climate Change (IPCC) is clear that climate pollution from existing fossil fuel infrastructure already exceeds the remaining carbon budget for 1.5 degrees. Projected emissions from existing and planned fossil fuel developments are approximately equal to the remaining budget for 2 degrees.⁴

Today, climate tipping points are either underway or imminent for the Greenland and West Antarctic ice sheets, boreal permafrost, mountain glaciers and parts of the Amazon.⁵ The opening up of new fossil fuel acreage is at odds with a safe climate, international law and with commitments Australia has made under the Belém Declaration and the Paris Agreement.

The new acreage cannot deliver affordable gas

Amplitude Energy’s East Coast Supply Campaign involves prospects within their existing production licenses in the Otway Basin. The company has advised investors that they calculate \$12/GJ as a minimum low price scenario, and are hoping for between \$15.10 and \$18.85/GJ from the Campaign.⁶ Gas produced within the proposed acreage would be more expensive still because it is further offshore and not close to existing infrastructure.

This is not affordable gas. The Victorian gas market average daily weighted price by quarter has not exceeded \$15/GJ since the Russian invasion of Ukraine, which caused a massive price spike.⁷ This directly conflicts with the FGS, which states that gas must remain affordable for Australian users.

³ Moon, Gillian, and Wesley Morgan. “World’s Highest Court Issues Groundbreaking Ruling for Climate Action. Here’s What It Means for Australia.” *The Conversation*, July 24, 2025. <https://doi.org/10.64628/AA.eu6r5h9jm>.

⁴ 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/>.

⁵ Ripple, William J., Christopher Wolf, Johan Rockström, et al. ‘The Risk of a Hothouse Earth Trajectory’. *One Earth*, 11 February 2026, 101565. <https://doi.org/10.1016/j.oneear.2025.101565>.

⁶ Amplitude Energy. “Offshore Otway Basin Investor Seminar.” September 2, 2025. <https://openbriefing.com/AsxDownload.aspx?pdfUrl=Report%2FComNews%2F20250902%2F02988160.pdf>.

⁷ Australian Energy Regulator. “Victorian Gas Market Average Daily Weighted Prices by Quarter.” Accessed February 17, 2026. <https://www.aer.gov.au/industry/registers/charts/victorian-gas-market-average-daily-weighted-prices-quarter>.

The new acreage involves new seismic blasting and new infrastructure

A guiding principle of the FGS is that “exploration and development should focus on optimising existing discoveries and infrastructure”, “minimising seismic surveying where possible.”⁸ However, this proposal involves entirely new acreage requiring new infrastructure. The government has placed no restriction on seismic blasting and industry has confirmed that new seismic blasting would be necessary.⁹

Seismic blasting uses underwater airguns to produce blasts of up to 240 decibels, more than 10,000 times the *maximum possible* sound pressure level through air (194 decibels). There is clear and growing evidence that seismic blasting permanently and cumulatively harms 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.¹⁰ The Otway Basin provides important habitat for such animals including protected sanctuaries for blue whales, southern right whales, and their calves.

Seismic blasts also kill shellfish and zooplankton and cause significant and lasting damage to lobsters and octopus.¹¹ Even studies funded by the seismic blasting companies have found uncontrollable impacts and have been unable to determine a safe operating distance for seismic blasting.¹² Despite this, the acreage areas are directly adjacent to two National Park Zones.

Unsurprisingly, communities care about their marine environment and strongly oppose seismic blasting. Recent consultations on seismic blasting proposals for the Otway Basin attracted 50,000 submissions from community members.¹³ Multiple local councils in coastal Victoria, including Moyne and Glenelg, have voted to oppose seismic blasting.¹⁴

⁸ DISR. Future Gas Strategy. Department of Industry, Science and Resources, 2024.

<https://www.industry.gov.au/sites/default/files/2024-05/future-gas-strategy.pdf>.

⁹ ABC News. “Coastal Communities Delighted by ‘rare’ Seismic Testing Rejection.” February 12, 2026.

<https://www.abc.net.au/news/2026-02-12/regia-3d-mss-project-seismic-testing-rejected-gas-exploration/106334294>.

¹⁰ 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-](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)

[F1727.Ewt%20Research%20&%20Technical%20Paper%201%20-%20Koper%20&%20Plon%20-%20Ocean%20Noise%20Pollution.Pdf](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).

¹¹ 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>.

¹² 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.oceannoise.com/wp-content/uploads/2023/05/Abstract-booklet.pdf>.

¹³ ‘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>.

¹⁴ ‘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

Seismic blasting does not have social licence. Our message to the Joint Authority is that it should be permanently banned, and certainly not be allowed in relation to this acreage.

Households and businesses are turning away from gas faster than forecast

The FGS posits that new sources of gas supply are needed to meet demand, based on projections in the Australian Energy Market Operator (AEMO)'s 2024 Gas Statement of Opportunities (GSOO). However, gas consumption patterns are changing rapidly in Victoria and the states that Victoria exports gas to (New South Wales, Tasmania and South Australia).

Gas demand forecasts have already dropped significantly in the short time since the 2024 GSOO. Between the 2024 and 2025 GSOO forecasts, forecast demand for gas-powered generation in Victoria, NSW, SA and Tasmania for the period 2025-2043 dropped by 21 percent (based on the Step Change scenario). Forecast total demand for fossil gas in Victoria, NSW, SA and Tasmania for the period 2025-2043 dropped by 8.2 percent (based on the Step Change scenario).

Since 2023, the previously predictable relationship between winter temperatures and Victorian gas consumption has broken down. 2025 was comparable to 2011 in terms of effective degree days over April to September yet residential and small/medium business gas consumption was around 16 PJ lower (Figure 1).

Similarly, gas consumption by large industrial and commercial customers is dropping rapidly. Between 2022 and 2025, tariff D gas demand in Victoria has dropped between 5.0 and 7.9 percent year on year, an acceleration of a long-term decline (Figure 2). The other major gas use category, gas-powered generation, is also trending down as more renewable generation and battery storage is added to the national energy market (Figure 3).

The FGS is based on data that has quickly become out of date. Destructive, unnecessary exploration activities are not justified. Gas is a single-use fuel burned in outdated, inefficient appliances necessitating more extraction and making a major contribution to climate change. Governments that are serious about maintaining a safe climate for current and future generations and serious about economic productivity should not be supporting the expansion of the gas industry.

You are welcome to contact me on the details below should you wish to discuss this submission in more detail.

Dr Kat Lucas-Healey
Senior Climate and Energy Advisor
Environment Victoria
k.lucashealey@environmentvictoria.org.au
0404 571 605

April 2024, <https://www.standard.net.au/story/8604146/glenelg-shire-council-calls-for-seismic-testing-moratorium/>.

Figures

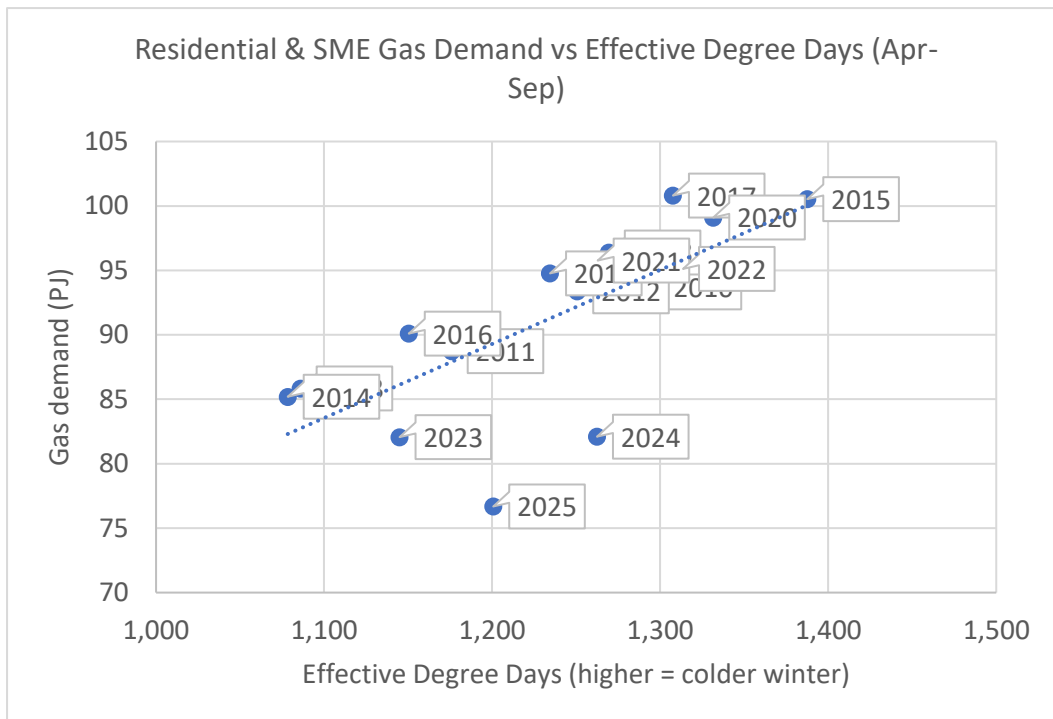


Figure 1: Residential and small/medium business gas consumption versus effective degree days.

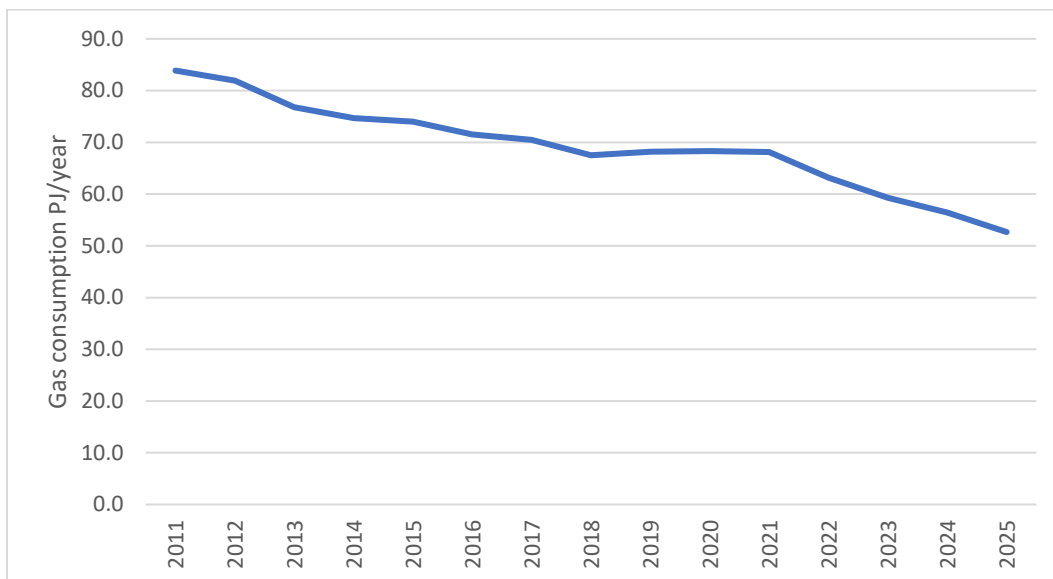


Figure 2: Annual tariff D gas demand in the Declared Wholesale Gas Market (sources: AEMO Quarterly Energy Dynamics Q1-Q4 2025).

Total Renewable Energy versus Gas Generation in the National Electricity Market (NEM)

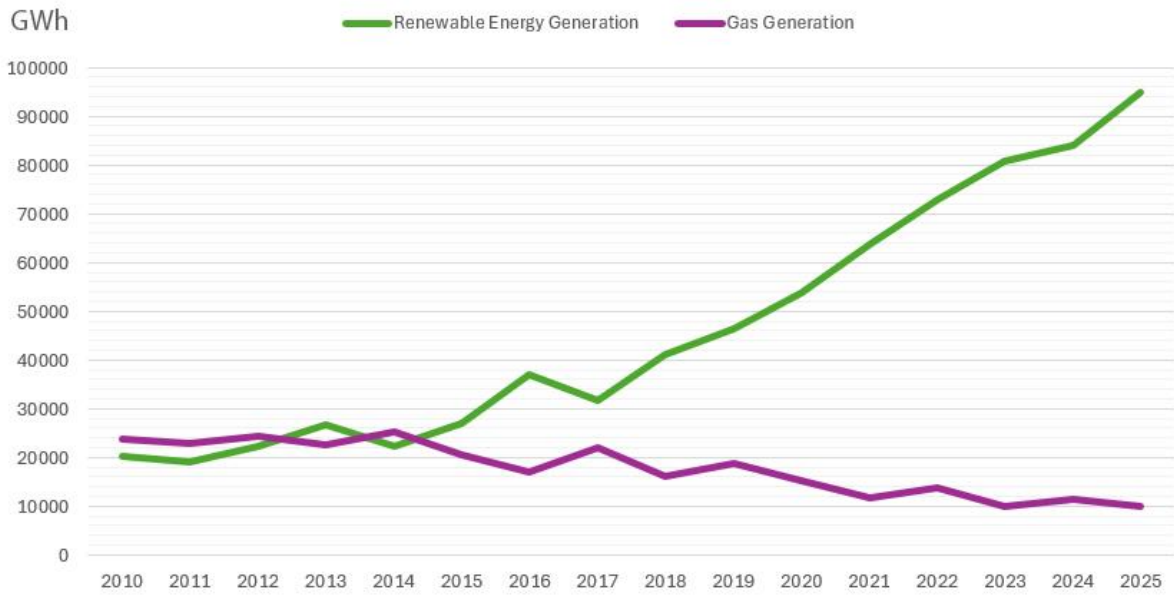


Figure 3: Electricity generation in the national energy market, renewables vs gas.