

Request to be heard?: No - but please email me a copy of the Timetable and any Directions

Full Name: Anthony Smith

Organisation:

Affected property:

Attachment 1:

Attachment 2:

Attachment 3:

Comments: Thank you for the opportunity to make this submission. In their EES Summary Report (page 16), Kalbar have calculated their Scope 2 carbon emissions (no mention of Scope 1), but have not mentioned any form of mitigation. Scope 2 emissions are those generated by electricity use. To not mitigate Scope 1 & 2 emissions goes against the objects of the Climate Change Act (Vic) and the state approach to Zero Net Emissions (ZNE) by 2050. It is also inconsistent with Kalbar's own environmental policy, in which it "acknowledges its responsibility to the environment and is committed to implementing practices that promote environmental sustainability". The policy also says that "we will undertake all necessary environmental assessments for our operations and use the best available evidence to identify how we can prevent, minimise, mitigate or remediate any harmful effects of our operations on the environment". To rehabilitate and restore the land for agriculture and native grassy woodlands is one thing – but to produce greenhouse gas emissions unabated is another. Scope 2 Emissions Kalbar's EES states that during construction, the project is anticipated to use 265,073 gigajoules (GJ) of energy and emit about 18,600 tonnes of carbon dioxide equivalent greenhouse gases (t CO₂-e). In operations, the annual anticipated energy use ranged from 487,346 to 745,305 GJ and annual greenhouse gas emissions ranged from about 57,500 to 80,100 t CO₂-e. Over its lifetime, the project is anticipated to use 9,006,435 GJ of energy and emit 1,046,400 t CO₂-e. Kalbar then states that "by way of comparison, the maximum annual greenhouse gas emissions from the project represent 0.01% and 0.07% of national and state emissions respectively". While this may be so, this still represents an additional million t CO₂-e at a time that the state is on a pathway to ZNE. In order to not add to the state's carbon budget and achieve Scope 2 ZNE for the project, Kalbar has the opportunity to purchase green energy (capitalise the cost during construction, consider as OPEX during its proposed 15 - 20 year operations). Alternatively, Kalbar could put in a renewable energy facility (totally capitalised) and save the grid electricity cost. This is an even better result – no Scope 2 emissions and reduced OPEX costs. Scope 1 and 3 Emissions Kalbar should also calculate their Scope 1 (direct) emissions in advance (as best as possible) and implement measures to minimise emissions, and seek to offset the remainder. For a truly carbon neutral operation (to be faithful to their environmental policy), Scope 3 emissions should also be calculated and addressed.