



10 September 2018

Hon. Richard Wynne MP  
Minister for Planning, State of Victoria  
Level 20, 1 Spring Street  
MELBOURNE VIC 3001

Dear Minister,

**Referral of AGL Gas Import Jetty Project and APA Crib Point Pakenham Pipeline Project for decision on the need for assessment under the *Environment Effects Act 1978***

AGL Wholesale Gas Limited (**AGL**) and APA Transmission Pty Limited (**APA**) are seeking a decision as to whether an Environment Effects Statement (**EES**) under the *Environment Effects Act 1978* (**EE Act**) is required for a proposal comprised of the following projects:

- (a) the AGL Gas Import Jetty Project (**Jetty Project**); and
- (b) the APA Crib Point Pakenham Pipeline Project (**Pipeline Project**).

While we understand that the Minister seeks to make a decision on the overall proposal, enclosed are separate respective referral forms, together with separate supporting technical studies for each of the two related projects. This cover letter includes an overview of both the interrelation of two projects and the potential for cumulative direct and indirect impacts. The attached Cumulative Impacts Assessment Report provides further detail in order for the potential cumulative and indirect impacts from the pipeline and import jetty projects to be considered (as a whole). The report cross references the technical assessments and respective referral forms for each project where appropriate.

While the referral documentation for both projects are being submitted together for consideration, the Jetty Project and the Pipeline Project will each be constructed, owned and operated by different companies (i.e. AGL and APA respectively). The projects also have some specific environmental impacts given their different characteristics and spatial locations (for example, the Pipeline Project primarily has terrestrial impacts whilst the Jetty Project has marine impacts). This means that each company has undertaken separate focused technical assessments to support their respective referral form. Further to this, at the operational level, these technical assessments will form part of the Environmental Management Plans and operational controls each company needs to implement for their respective project.

**The Proponents**

AGL is part of the AGL group and has over 180 years history in the energy industry, operating across the supply chain with investments in energy retailing, thermal electricity generation and renewable projects. It owns and operates two gas storage facilities – Newcastle Gas Storage and Silver Springs Gas Storage Facility and is one of Australia's largest retailers of gas and electricity with more than 3.6 million customers in Victoria, New South Wales, South Australia, Western Australia and Queensland.



APA is part of the APA Group which operates and maintains 15,000 kilometres of natural gas pipelines across mainland Australia. It is the owner of gas storage facilities, gas-fired power stations and wind farms, with extensive 'in-house' expertise in pipeline and facility design and construction, planning and environmental management.

APA and AGL have engaged suitably qualified consultants to undertake a range of specialist investigations relevant to the Jetty Project and Pipeline Project.

### **Jetty Project**

The referral documentation for the Jetty Project relates to AGL's development of a Liquefied Natural Gas (**LNG**) import facility, using a Floating Storage and Regasification Unit (**FSRU**), to be located at Crib Point. The Jetty Project comprises:

- the continuous mooring of an FSRU at the existing Crib Point Jetty, which will receive LNG carriers of approximately 300m in length; and
- the construction of ancillary topside jetty infrastructure including high pressure gas unloading arms and a high pressure gas flowline mounted to the jetty and connecting to a flange on the landside.

### **Pipeline Project**

The referral documentation for the Pipeline Project relates to APA's development of a bi-directional high pressure gas pipeline of approximately 56 km in length between Pakenham and the Crib Point import facility. The initial purpose of the Pipeline Project is to enable the connection of the Jetty Project to the Victorian Transmission System. Separately, the Pipeline Project will also enable gas to be transported from the Victorian Transmission System, to any other future users along the pipeline route.

### **Approval and Regulation of the Projects**

The primary operational regulation of the Jetty Project and the Pipeline Project will also occur under different legislative frameworks. The Jetty Project will be assessed and if approved, operate pursuant to a works approval and an environmental licence under the *Environment Protection Act 1970*, and the Pipeline Project will, once assessed and if granted, operate pursuant to a pipeline licence granted under the *Pipelines Act 2005*.

While the Jetty Project and the Pipeline Project are being referred for decision as to whether an EES is required under the EE Act, further assessment requirements will need to be undertaken in the context of other relevant statutory approval requirements (as outlined above) for each of the two projects.

### **Indirect and Cumulative Impacts**

AGL and APA both recognise the importance of ensuring that the analysis and decision-making under the EE Act for the proposed Liquefied Natural Gas (LNG) import facility at the Jetty and the Pipeline is able to consider all of the relevant direct, indirect and cumulative impacts of the projects, together.

Accordingly, AGL and APA are submitting their respective referral documentation together. Each of the referral documents explicitly identifies the relationship between the projects each company is undertaking, and provides information about the indirect and cumulative impacts of them in respect of the other. The *Cumulative Impact Assessment Report* also provides a comprehensive discussion of the indirect and cumulative impacts between the Jetty Project and the Pipeline Project together. This report cross references the technical assessments of each project where necessary.



The referrals provide a fulsome evaluation of relevant direct, indirect and cumulative impacts of the projects, in order to enable a comprehensive, integrated and transparent assessment to be carried out.

**EES Decision**

AGL and APA both look forward to receiving your decision as to whether an EES is, or is not, required in relation to the proposed Jetty Project and the Pipeline Project.

Please contact Stuart Galway, Senior Manager – Land and Approvals at AGL (02) 9921 2195 or [sgalway@agl.com.au](mailto:sgalway@agl.com.au) if you require any further information regarding the Jetty Project and AGL's referral documentation.

Please contact Marisa Feher, Project Licensing and Environmental Approvals Lead at APA on (03) 8533 2106 or [Marisa.Feher@apa.com.au](mailto:Marisa.Feher@apa.com.au) if you require any further information regarding the Pipeline Project and APA's referral documentation.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Phaedra Deckart'.

Phaedra Deckart

**General Manager  
Energy Supply & Origination  
AGL Wholesale Gas Limited**

A handwritten signature in blue ink, appearing to read 'Rob Wheals'.

Rob Wheals

**Group Executive Transmission  
APA Transmission Pty Limited**