Thank you for the opportunity to comment on the TGS Otway Basin 3D Multi-Client Marine Seismic Survey (‘seismic survey’) Environmental Plan.

I am the Chair/President of the [Boardriders Club], a surfing club based in [Location]. [Describe how many members in the Club].

As surfers, all our members are marine users of the coastal environments and sea country that span Victoria’s western coast from Melbourne (Naarm) to the South Australian border. The physical and natural resources that cover these environments are critical to our wellbeing, individually and as a community. Our health, wellbeing and social connections rely on these environments and any disruption to them, whether temporary or permanent, has significant impacts for us.

We also acknowledge the continuing connection and cultural practices of the First Nations peoples who have been stewards of the Sea Country extending across the coastal areas now known as Victoria since time immemorial. We note that their ability to practice their culture is a human right protected by Australian and international human rights law. Accordingly, we do not support any disruption to cultural practices and songlines of those First Nations peoples related to whale migration pathways and breeding cycles which are at high risk due to the seismic survey.

About [Boardriders Club]

[Provide a description of your club]

[Boardriders Club] is a ‘relevant person’ under regulation 11A(d) of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Cth), as it is an organisation whose functions, interests and activities may be affected by the seismic survey to be carried out under the Environmental Plan. Specifically, the functions, interests and activities of [Boardriders Club] involve supporting the participation of our members and supporters in surfing and the Environment that May Be Affected (EMBA) includes beaches, breaks and surf spots that are used frequently by our members and for surf events and gatherings held by [Boardriders Club]. This includes the coastline from the Bellarine Peninsula to Port Fairy and further west of the Otways.

Comments on TGS Otway Basin 3D MC MSS Environmental Plan

For the reasons outlined below, [Boardriders Club] considers that the Environmental Plan does not meet the criteria for NOPSEMA’s acceptance, set out under regulation 10A of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* and should, therefore, be refused.

The nature and scale of surfing within the broader EMBA is not sufficiently described in the Environmental Plan and the Environmental Plan is silent regarding any of the social, economic and cultural impacts that are a significant risk as a result of the proposed seismic survey.

Relevant consideration has not been made for the social wellbeing of coastal communities. Indirect impacts from the seismic surveying on coastal areas have not been outlined. Impacts have the potential to disrupt social and recreational users of these spaces.

We are of the view that key critical environmental impacts and risks have not been identified within the Environmental Plan, and where environmental impacts and risks have been outlined, the controls proposed to mitigate them are insufficient.

Oil spills and other marine pollution at sea by TGS in undertaking the seismic survey and in potential oil and gas production activities are an unnecessary risk, particularly for surfers. The EMBA zone shows oil spills may reach much of the Victorian and Tasmanian coastlines that are inaccessible to enable amelioration of the damage. Further, many of the chemical dispersants utilised by industry to clean up oil spills are known carcinogens. The risks to human health, marine life and coastal ecologies have not been adequately addressed in the Environmental Plan, and we believe that a precautionary approach is required given the presence of these risks is reasonably foreseeable.

The proposal to conduct seismic surveying for oil and gas exploration in our oceans will cause direct harm to ocean ecosystems. As seismic surveying is a pathway to fossil fuel extraction, plans to continue exploration go directly against Australia's commitments to reduce greenhouse gas emissions by 43% from 2005 levels, and net zero emissions by 2050.

The Environmental Plan does not address performance outcomes, measures and targets related to the impacts of the seismic survey on surfing, as well as to surfing clubs, surfing schools and the related surfing industry that contributes significantly socially, recreationally and economically to Victoria and Australia. The environmental performance outcomes, standards and measures set out at section 7.1.7 of the Environmental Plan focus primarily on commercial fishing operators, and controls have not been identified for other marine users, including [Boardriders Club] (and any other surf or boardriders club) as ‘relevant persons’ within the meaning of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009*.

As stated above, [Boardriders Club] is a ‘relevant person’ under regulation 11A(d) of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009*. [Boardriders Club] has not been contacted by TGS in relation to proposed activities, and in particular, no prior information has been provided to [Boardriders Club] to support an informed assessment of the possible consequences of the seismic survey on [Boardriders Club]’s functions, interests or activities. Because there has been no consultation with [Boardriders Club], the Environmental Plan does not identify nor address any measures to mitigate or manage the foreseeable impacts and risks on [Boardriders Club]’s activities as a consequence of the seismic survey.

For the reasons set out above, [Boardriders Club] does not believe that the Environmental Plan complies with relevant law and regulations and therefore should not be accepted.

Should there be any further questions in relation to this submission, or to consult in relation to the proposed seismic survey, please contact [Contact person] at [email address].