

By email

[works.approvals@epa.vic.gov.au](mailto:works.approvals@epa.vic.gov.au)

12 October 2016

To the EPA,

**RE: Loy Yang B works approval application, number 1002253, IPM Operation & Maintenance**

I am writing to provide the formal submission of Environment Victoria on the application by Loy Yang B for works approval to retrofit its turbines.

IPM is proposing to retrofit existing turbines to increase electricity generation capacity from 1026 MW to 1140 MW. Despite a reduction in emissions intensity of carbon dioxide, this project would still lead to an *increase* in CO<sub>2</sub> emissions of approximately 320,000 tonnes per year. The project will cost \$50-55 million and is proposed to take place in 2019-2020.

The application indicates that air pollution will also increase, including a 6% increase in fine particulate matter, which contributes to a range of respiratory illnesses. Even if increases in air pollutants are within existing EPA licences, this is still a bad outcome for the health of Latrobe Valley residents.

The application claims that improving efficiency at LYB will displace “higher carbon intensity power from black coal generators in NSW”. Even by reducing emissions intensity at LYB to 1.17, the power station would remain in the top four dirtiest power stations in Australia (behind only the three other Latrobe Valley generators). Black coal plants in NSW all have lower emissions intensity than 1.17, so this is a misleading claim by IPM.

While improvements in emissions intensity are commendable, ultimately approval of this project would still lead to an increase in coal generation capacity and an increase in CO<sub>2</sub> emissions, precisely at a time when both of these need to be decreasing rapidly to avoid the worst impacts of climate change.

The Victorian government has announced a target of net zero emissions by 2050. Analysis of carbon budgets suggests we need to decarbonise much more quickly than that to limit global warming to under two degrees.

In the absence of a clear government plan to rapidly reduce CO<sub>2</sub> emissions, in particular from the electricity sector, the EPA should reject this application.





Instead, the EPA should urgently develop regulations and require proposals from each generator to ensure that total CO2 emissions from each power station is being reduced.

Victoria has a climate problem, not an electricity problem. Government decision making, including the EPA's consideration of this works approval application, needs to focus on reducing total CO2 in Victoria.

A handwritten signature in black ink, appearing to read "N. Aberle".

Regards,

Dr Nicholas Aberle  
Campaigns Manager  
Environment Victoria  
[n.aberle@environmentvictoria.org.au](mailto:n.aberle@environmentvictoria.org.au)  
03 9341 8112

