

18 August, 2022

The Honourable Catherine King MP  
Parliament Office  
PO Box 6022.  
House of Representatives  
Parliament House  
Canberra ACT 2600  
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Also sent by email to: [Minister.King@mo.infrastructure.gov.au](mailto:Minister.King@mo.infrastructure.gov.au)

Dear Minister,

Can we take this opportunity to express our gratitude to the Australian Labor Party for legislating a strengthened emissions reduction target.

The No 3rd Tulla Runway coalition ([www.no3rdtullarunway.net.au](http://www.no3rdtullarunway.net.au)) is an alliance of community groups concerned about the harmful impacts of the proposed Melbourne Airport Third Runway, including, pollution, noise and global warming emissions.

Our coalition members have previously submitted feedback to Melbourne Airport during its 1 February to 16 May 2022 consultation period, on both its preliminary Draft Master Plan 2022 and preliminary Draft Melbourne Third Runway Major Development Plan (M3R MDP).

We therefore ask for you to accept this letter as a supplementary submission, addressing new developments that we believe should be taken into account in assessing Ministerial approval for the Draft Plans.

Specifically:

1. The Climate Change Act 2022, once it is in force, commits Australia to reducing greenhouse gas emissions by 43% below 2005 levels by 2030. The Draft M3R MDP of the applicant, Australian Pacific Airports Melbourne (APAM), does not factor in or respond to this legislation;
2. Climate Change Minister, Chris Bowen, on 29 June 2022 at the National Press Club in Canberra, specifically ruled out the use of offsets in achieving emissions reductions of 43% across the transport sector.

The Draft M3R MDP includes no assessment of the way in which, with a Third Runway, APAM can reduce global warming emissions, that Melbourne Airport enables, by 43% below 2005 levels by 2030, and without using offsets.

APAM's preliminary Draft M3R MDP emissions assessment responds with no reduction of any percentage. Alarming, we note it understates actual total flight emissions increases enabled by the Third Runway by assessing only Landing and Takeoff (LTO) CO2 emissions.

As such, we would argue that it would be inappropriate for the Transport Minister to approve a Draft M3R MDP that includes neither a response to this legislation or the Climate Change Minister's ruling re offsets.

We also note that, if the current Draft M3R MDP is not approved, it will not delay the applicant's schedule for the development, since it is asking, as you will be aware, for an additional 5 years to complete M3R anyway\*.

In conclusion, we trust you will consider the above information and reject the application by APAM. As you will understand, we will have to consider our legal options to any Ministerial decision approving the current M3R MDP.

Yours sincerely,  
Mark Carter  
for the No 3rd Tulla Runway coalition  
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*\*See M3R MDP Chapter A2 The need for the project A2.4.1.1 Overview "Melbourne Airport is therefore seeking an extended period of approval in the Minister's decision for this MDP – from the usual five years to 10 years – to account for this short-term uncertainty and allow for delayed recovery and development scenarios."*