



Australian Government  
Defence

# Submarine Rotational Force – West Priority Infrastructure Works

EPBC 2024/10031

Preliminary Documentation  
Public Comment Submissions Report, February 2025





## Publication of Public Comment Submissions Report

In accordance with Section 95(2) of the EPBC Act, public comment was invited on the action proposed to be taken at HMAS Stirling, Garden Island, Western Australia. The Department of Defence has finalised the Public Comment Submissions Report, summarising and responding to public comments received.

The finalised report is made available for **public information only**, under Section 95B(2) of the EPBC Act.



## Acknowledgement of Country

Defence acknowledges the Traditional Custodians of Country throughout Australia.

Defence recognises their continuing connection to traditional lands and waters and would like to pay respect to their Elders both past and present.

Defence pays respect to the Aboriginal and Torres Strait Islander men and women who have contributed to the defence of Australia in times of peace and war.



**Image:** Navy's Indigenous Advisor Lieutenant Commander Samuel Sheppard soaks up the smoke during the smoking ceremony at Camp Markham, HMAS *Stirling*, Western Australia. Photo: LSIS Richard Cordell, Department of Defence, 2022.

## Defence Privacy Statement

The Department of Defence must comply with Australian Privacy Principles contained in the *Privacy Act 1988*, which govern the handling of personal (including sensitive) information. As such, no personal information is disclosed in this report. For further information about how Defence handles personal information, refer to the [Defence Privacy Policy webpage](#).



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## Acronyms

Acronyms	Meaning
<b>ASA</b>	Australian Submarine Agency
<b>ARPANSA</b>	Australian Radiation Protection and Nuclear Safety Agency
<b>AUKUS</b>	Trilateral security partnership between Australia, the United Kingdom and the United States
<b>DCCEEW</b>	Department of Climate Change, Energy, the Environment and Water
<b>DHA</b>	Defence Housing Australia
<b>EPBC Act</b>	<i>Environment Protection and Biodiversity Conversation Act 1999</i>
<b>EPR</b>	Emergency preparedness and response
<b>IAEA</b>	International Atomic Energy Agency
<b>RFI</b>	Request for information
<b>TEC</b>	Threatened Ecological Community
<b>SRF-West</b>	Submarine Rotational Force - West
<b>SSN</b>	Ship Submersible Nuclear
<b>UK</b>	United Kingdom
<b>US</b>	United States
<b>WA</b>	Western Australia



# 1 Introduction and background

The Department of Defence (Defence) is delivering the Submarine Rotational Force – West (SRF-West), Priority Infrastructure Works Project (the Project) to support conventionally armed, nuclear-powered submarines at HMAS *Stirling*, Garden Island/*Meeandip*, Western Australia.

Defence referred the Project to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) in October 2024 (EPBC Act number 2024/10031). The Project comprises:

- upgrade and install new maritime infrastructure including, pier and wharf improvements, mooring dolphin, new small vessel pontoons and berthing, and associated dredging works and piling.
- construction and operation of a Controlled Industrial Facility (CIF) to manage and temporarily store low-level radioactive material and waste. Associated infrastructure and works include:
  - hardstands
  - roads
  - buildings
  - water tanks
  - utility building
  - in-ground infrastructure and drainage
  - vegetation removal
  - piling
  - lay down areas.

The proposed action was determined by DCCEEW to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) with assessment by Preliminary Documentation. The relevant controlling provision is Section 28 – Commonwealth Action.

## 2 Purpose of this document

Section 95(2) of the EPBC Act requires public comment to be invited on the proposed action by Defence.

The Deputy Prime Minister announced the public comment period and the availability of the Preliminary Documentation for review on 29 January 2025. Defence provided notice of the public comment period in state and local newspapers from 1 February 2025 and invited public submissions and comments during the period 1 to 14 February 2025. During this period, Defence received 45 public submissions relating to the referral from interest groups, businesses and individuals. This report documents the public comment process, submissions received, and Defence's response to public comments related to the proposed action.



## 3 Preliminary Documentation display

Defence exhibited the Preliminary Documentation in electronic and hard copy. The information exhibited included copies of the EPBC 2024/10031 referral submission and the following attachments:

- Environment and Heritage Assessment
- Biodiversity Values Report
- Heritage Impact Assessment
- Consultation Action Plan
- Consultation Outcomes Main Report A1-3
- Consultation Outcomes Report A4-10
- Underwater Noise Modelling Report
- Terrestrial Noise Impact Assessment
- Terrestrial Contamination Assessment and Sampling Analysis and Quality Plan
- Dredge Disposal Option Study
- Dredge Plume Modelling Report
- Marine Sediment Sampling and Analysis Plan Implementation Report
- HMAS *Stirling* Little Penguin Survey and Management Report
- Penguin Protection Strategy
- Benthic Habitat and Seagrass Values Autumn Survey Report
- Terrestrial Flora Fauna Survey
- Marine Fauna Desktop Report 1
- Marine Fauna Desktop Report 2
- Marine Fauna Desktop Report 3
- Garden Island Targeted Bird Survey Report
- Socio Economic Impact Assessment
- EPBC 2024/10031 RFI Questions and Responses (including attachments A through T)

### 3.1 Details of the display

Hard copies of the Preliminary Documentation were available to view between 31 January 2025 and 14 February 2025 at the following locations:

- State Library of Western Australia, 25 Francis St, Perth, WA 6000
- Rockingham Public Library, Dixon Road, Rockingham, WA 6168

Electronic versions of the documentation were made available to be viewed or downloaded in portable document format from the Project website <https://www.defence.gov.au/about/locations->





property/infrastructure-projects/submarine-rotational-force-west-infrastructure-project between 29 January 2025 and 14 February 2025.

During this period, the Project website received a total of 729 unique users, of which 288 (39.5%) were local to the Perth area.

To ensure documents were accessible, persons with accessibility needs (for example those for whom English is a second language or who have a vision impairment) were invited to contact the Project team by phone for assistance in accessing the documentation.

## 4 Invitation for public comment

Members of the public were invited to make a submission by:

- Emailing [srf-west.infrastructureproject@defence.gov.au](mailto:srf-west.infrastructureproject@defence.gov.au), or
- Sending a hard copy to PO Box 7925, CANBERRA, ACT, 2610.

### 4.1 Advertising

The public display was advertised in local and state-based newspapers as follows:

- *West Australian* – Saturday 1 February 2025
- *Fremantle Herald* (North & East) - Saturday 1 February 2025
- *Sound Telegraph* – Wednesday 5 February 2025
- *Perth Now Fremantle-Cockburn* – Thursday 6 February 2025
- *Fremantle Herald* (South & West) - Saturday 8 February 2025.

## 5 Consideration of public submissions

Defence received 45 submissions by the closing date and time of 10.00 pm AEDT Friday 14 February 2025. Each submission was examined individually, and the matters raised in the submissions have been collated and grouped by theme. A summary of the submissions by theme, is provided in sections 5.1 and 5.2 of this report.

### 5.1 Summary of key points raised in submissions

Submissions focused on a number of common themes, and were largely consistent with comments and feedback received from the community and stakeholders during previous extensive public consultation activities in 2023 and 2024. The key themes raised have been grouped and summarised in the table below, with Defence's response to each.



**Table 1.** Submission themes, noting a total of 45 separate submissions received in total.

#	Theme	No of submissions referencing theme
1	Little penguins	31
2	Nuclear safety procedures	27
3	Assessment of potential impacts and protection of EPBC Act protected matters	25
4	Consideration of impacts on the Cockburn Sound/ <i>Derbal Nara</i> region including cumulative impacts	22
5	Potential increased security risks, the AUKUS program, and nuclear power and weapons safety	21
6	Assessment and potential impacts to local terrestrial flora and fauna	21
7	Radiological waste management	17
8	Marine environment and seagrass protection	9
9	Indigenous heritage values	7
10	Community consultation and EPBC Act process	7
11	Nuclear safety and the environment	6
12	Pollutants, chemicals and toxic substances	3
13	Economic and employment factors	3
14	Housing	3
15	Recreational fishing and access	2
16	Nuclear technology	2
17	Traffic	2



## 5.2 Responses to public submissions

Submissions provided feedback related to potential environmental impacts of construction and operation to little penguins, the marine environment and seagrass, and several EPBC listed flora and fauna species. Submissions noted concerns about radiological waste management, nuclear waste, nuclear safety, and risks associated with nuclear activities in the region. Submissions also raised concern with AUKUS and geopolitical matters.

Matters raised in submissions were similar to those received during previous community consultation activities for the Project. Previous consultation reports are available on the SRF-West Infrastructure Project Documentation webpage as Att 5.1 and 5.2.

<https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/submarine-rotational-force-west>

Given the extensive community and stakeholder consultation already conducted for the Project, much of the feedback received is already incorporated into project planning.

Defence is proud of the relationships the Project has and continues to build with key stakeholders including across all levels of Government and in the community, and of the positive impact this has had on Project development.



**Table 2.** Submission themes and Defence responses.**Little penguins**

No.	Theme	Summary of comments	Number of submissions referencing theme
1	Little penguins	<ul style="list-style-type: none"> <li>Concern about potential impacts to the broader little penguin population, including Penguin Island.</li> <li>Concern about proximity of proposed works to the little penguin colony on Garden Island/<i>Meeandip</i> including potential impacts to habitat, breeding grounds and nesting sites.</li> <li>Concern about the potential impact of construction on little penguins including vegetation clearing, noise, vibration, turbidity and water quality, including from dredging.</li> <li>Concern about potential impacts on foraging in Cockburn Sound/<i>Derbal Nara</i> from increased shipping activities.</li> </ul>	31
<b>Response to comments</b>			
<p>Defence has a proud history of protecting and managing the little penguin population at HMAS <i>Stirling</i>. This will continue with the proposed mitigation measures for the Project.</p> <p><u>Potential impacts to broader little penguin population</u></p> <p>Defence is committed to the protection of little penguins. The little penguin colony on Garden Island/<i>Meeandip</i> has a long co-existence with Defence activities. Defence has supported the safeguarding of the colony including by providing fencing, nesting boxes and feral predator control, and by supporting longstanding and ongoing research and monitoring of the colony by a local penguin expert.</p> <p>The Project does not involve any works near Penguin Island, and will not impact the Penguin Island colony.</p> <p>In acknowledgment of the pressure on the population of little penguins at Penguin Island, there has been careful consideration of construction methodology, timing and other controllable variables that are described in detail below.</p> <p><u>Controls to limit potential construction impacts</u></p> <p><i>Dredging:</i> Several controls and mitigations are in place to avoid and reduce the potential impacts of dredging to the little penguins. This includes having monitoring specialists in place and shut down procedures, and limiting the times when dredging can occur. Dredging within Careening Bay will be planned for times when little penguins are off-colony foraging, which is generally in March. Dredging at the Armament Wharf is not expected to be of any risk as there is not a breeding colony in that area; therefore it is suitable for a dredging schedule outside of the March timeframe. The Framework Construction Environmental Management Plan and the framework Penguin Protection Strategy developed specifically for the Project set out these controls to ensure dredging has minimal potential impact to little penguins and other marine animals.</p> <p><i>Piling:</i> Piling activities for the pier and wharf are specifically designed to have minimal impact on the environment. For example, to reduce impacts the construction project has planned to limit piling in Careening Bay while also applying construction techniques to reduce the potential impacts of noise or vibration. This reduces the risk of potential impacts to little penguins.</p>			



**Other construction activities:** In recognition of the sensitive little penguin nesting areas, no works have been proposed to the existing seawall where the main colony nests are. Some works to other areas within Moresby Harbour are required, which involve temporary disturbance to small areas along the harbour walls. To protect nesting areas there will be physical barriers installed and signage to ensure the areas are avoided. Monitoring and adaptive management activities will be implemented to avoid any potential direct or indirect impacts during construction.

**Monitoring:** Defence has existing annual monitoring and management plans in place to help protect little penguins on Garden Island/*Meeandip*. These activities will continue during and after the proposed construction.

**Increased shipping activities:** The operation and movement of vessels at Garden Island/*Meeandip* will remain in accordance with existing Defence operational activities and are not expected to have a significant impact on little penguins.

## Nuclear safety procedures

#	Theme	Summary of comments	Number of submissions referencing theme
2	Nuclear safety procedures	<ul style="list-style-type: none"> <li>Concerns that as HMAS <i>Stirling</i> is an 'agreed facility and area' under the Force Posture Agreement.</li> <li>Concern that a low-level nuclear accident could have devastating environmental and health effects.</li> <li>Concerns regarding a potential increased risk profile of the base, including given its proximity to the Kwinana industrial precinct.</li> <li>Concern about emergency management plans and transparency of information related to radiological waste management.</li> </ul>	27

### Response to comments

The Australian Government is committed to maintaining the highest levels of nuclear stewardship to protect the health and safety of people and the environment. SRF-West will occur under the 2014 Force Posture Agreement, with activities occurring at the invitation of Australia and with full respect for Australian sovereignty.

Safety is paramount, and the Australian Government, Defence and the Australian Submarine Agency (ASA) are committed to safe and secure nuclear propulsion technology for nuclear-powered submarines.

The decades of experience offered by the UK and US naval nuclear propulsion programs will enable Australia to become a responsible steward of its conventionally armed nuclear-powered submarines. The UK and US have never experienced a reactor accident or release of radioactive material that has had an adverse effect on the public or the environment. Australia is committed to upholding these standards.

The *Australian Naval Nuclear Power Safety Act 2024* enables the establishment of a dedicated, fit-for-purpose nuclear safety framework to support Australia's nuclear-powered submarine enterprise. This will include an independent regulator focused on the safety of our submariners, Australian and international communities, and the environment. It will impose clear nuclear safety obligations on personnel involved in the enterprise, backed with civil and criminal penalties if contravened.



Australia is working with AUKUS partners to mature its stewardship planning, operation, application and management of nuclear material, technology and facilities. Working with industry partners and State and Territory Governments, Australia will build a highly trained and experienced workforce, with a rigorous nuclear safety assurance regime across emergency preparedness and response, radiological controls, environmental monitoring and radioactive waste management.

In preparation for the commencement of SRF-West, a comprehensive emergency preparedness and response (EPR) system will be developed, implemented, validated and sustained at HMAS *Stirling*. The comprehensive EPR capability will provide efficient and timely response to any nuclear or radiological emergency whether on board an SSN or within the CIF.

The emergency response capability will be consistent with International Atomic Energy Agency safety standards, integrated with both the WA State Hazard Management Framework and the Australian Government Crisis Management Framework. The EPR capability will also meet the requirements of AUKUS partners, and the new Australian Naval Nuclear Power Safety Regulator (ANNPSR) which is required to certify EPR capabilities as fit for purpose prior to a nuclear licence being granted for NPS to operate at HMAS *Stirling*.

The HMAS *Stirling* EPR capability is centred upon a Nuclear Emergency Response Organisation (NERO) that will be established in 2026-27 and will maintain a persistent, first response capability in the highly unlikely event of a nuclear emergency or radiological incident. The NERO is controlled from an Emergency Control Centre to be built on Garden Island/*Meeandip* and will be fully integrated with the WA State Hazard Management Agency's practices and coordinated with the ARPANSA in their role as the Australian Government Coordinating Agency. These responses will be rigorously tested through small - and large - scale exercises prior to the ANNPSR being satisfied to certify the capability and grant a licence to operate for NPS.

## Assessment of potential impacts and protection of EPBC Act protected matters

#	Theme	Summary of comments	Number of submissions referencing theme
3	Assessment of potential impacts and protection of EPBC Act protected matters	<ul style="list-style-type: none"> <li>• Concern about potential impacts to habitats, breeding grounds and protected species, including:               <ul style="list-style-type: none"> <li>○ EPBC listed migratory shorebirds (such as osprey) and mammals (such as humpback whales, sperm whales and whale sharks).</li> <li>○ EPBC listed threatened birds (fairy tern), mammals (southern right whales and pygmy blue whales, Australian sea lions) and sharks (scalloped hammerhead sharks, great white shark).</li> <li>○ EPBC listed marine species (such as rainbow bee-eater, loggerhead turtles, leatherback turtles, penguins, <i>Syngnathids</i>).</li> </ul> </li> <li>• Concern about potential impacts from activities including dredging, vessel strikes, noise and movement limitations, light pollution, loss of habitat and foraging grounds, risk of ingesting pollutants.</li> </ul>	25



- Concern about specific construction methods including dredging, piling and seismic blasting on marine environment.

#### Response to comments

Defence is aware that Cockburn Sound/*Derbal Nara* and Garden Island/*Meeandip* are home to a number of native flora and fauna, some of which are listed as threatened, migratory or marine species under the EPBC Act. Defence is committed to ensuring the Project meets the requirements of the EPBC Act in all its activities.

Planning for the Project has included detailed analysis of EPBC listed species and potential impacts to the environment more broadly. Details of these assessments are included in the Environment and Heritage Assessment, Biodiversity Values Report and supporting documents for those reports. These set out the comprehensive process Defence has undertaken to identify species likely to be present in the Project area and surrounds, based on targeted field surveys and existing scientific assessment of the area including information available from DCCEEW.

The design and planning for construction has included controls to avoid and mitigate the potential for impacts to EPBC listed threatened and migratory species. This includes careful planning for potential impacts from dredging, vessel movement, noise, light pollution, loss of habitat and foraging grounds and risk of exposure to pollutants. Seismic blasting was never considered nor relevant to the Project.

Planning for construction included controls and carefully selected methods to avoid and mitigate potential impacts of works, as much as possible. Examples of controls in place to avoid and mitigate potential impacts of construction include staging and timing piling to reduce impacts on nesting little penguins and marine animals. Dredging has been reduced to the minimum volume and area possible and land-based piling will use screw, rather than impact piling to further reduce the potential noise and vibration impacts. The Framework Construction Environmental Management Plan developed for the Project includes examples of these controls and will continue to be informed by ongoing environmental monitoring throughout construction.



## Consideration of potential impacts on the Cockburn Sound /Derbal Nara region including cumulative impacts

#	Theme	Summary of Comments	Number of submissions referencing theme
4	Consideration of potential impacts on the Cockburn Sound region including cumulative impacts	<ul style="list-style-type: none"> <li>• Concern about further development to Garden Island/<i>Meeandip</i> and potential impacts on the environmental, cultural and social values of Garden Island/<i>Meeandip</i> and Cockburn Sound/<i>Derbal Nara</i>, including on:               <ul style="list-style-type: none"> <li>○ Terrestrial and marine flora and fauna on Garden Island/<i>Meeandip</i> and in Cockburn Sound/<i>Derbal Nara</i></li> <li>○ Amenity value for local community and visitors.</li> </ul> </li> <li>• Concern about potential cumulative impacts on Cockburn Sound/<i>Derbal Nara</i> from this proposal with other proposed projects in the region and intensification of industrial activities in Kwinana, particularly on marine species and marine ecosystem and amenity of local area, including Outer Harbour Port Development (Westport).</li> <li>• Concern about potential impact on Ramsar-listed wetlands in Rockingham Lakes Regional Parklands and Belcher Wetlands.</li> </ul>	22

### Response to comments

#### Consideration of social and cultural impacts to the Cockburn Sound/*Derbal Nara* region

HMAS *Stirling* is an operational Navy base on Garden Island/*Meeandip* and was commissioned in 1978. It is an enduring maritime operational base that is home to Fleet Base West, a homeport for approximately half of the Navy's major fleet units, including surface ships, submarines and embarked helicopter detachments. The base's primary purpose is to provide operational and logistics support to Royal Australian Navy ships, submarines and aircraft based in Western Australia. The proposed infrastructure is in alignment with the existing development and these operations at Garden Island/*Meeandip*. As proposed infrastructure works are aligned with current operations, it is unlikely that local residents will notice a marked change in naval shipping activities in Cockburn Sound/*Derbal Nara*.

The Environment and Heritage Assessment considers potential impacts to cultural and social values throughout, and the Heritage Impact Assessment considers the impacts to natural heritage values in more detail.

#### Consideration of other projects in Cockburn Sound/*Derbal Nara*

Defence recognises that there are other planned works by the West Australian Government within Cockburn Sound/*Derbal Nara*. The Environment and Heritage Assessment recognises this, as well as the community's connection to the natural environment of Cockburn Sound/*Derbal Nara*.

The scale of the Outer Harbour Port Development works (also referred to as Westport) at Kwinana are much greater than that proposed by Defence at HMAS *Stirling*. This is in terms of proposed dredging areas and volume, new infrastructure development, duration of works and introduction of new vessel movements





in Cockburn Sound/*Derbal Nara*. The works are also not currently scheduled to occur at the same time as SRF-West Priority Infrastructure Project.

#### Consideration of Ramsar-listed wetlands

The Ramsar-listed Wetlands of Rockingham Lakes Regional Parklands and Belcher Wetlands are a substantial distance from Garden Island/*Meeandip*, with the closest site located 15 km to the north-east on the mainland. There is no connection between the catchments of these wetlands (located on the mainland) and Garden Island/*Meeandip*. The proposed action will not impact the hydrological regime or water quality of the wetlands, or their catchments, or any native species dependent on these wetlands.

## Potential increased security risks, the AUKUS program, and nuclear power and weapons

#	Theme	Summary of comments	Number of submissions referencing theme
5	Potential increased security risks, the AUKUS program, and nuclear power and weapons	<ul style="list-style-type: none"> <li>• Opposition to and concern about AUKUS, calling for access to more information, engagement with community and public debate about policy decisions.</li> <li>• Concerns about security risks of nuclear-powered, conventionally armed submarines in region.</li> <li>• Concerns about use, or housing, of nuclear weapons at HMAS <i>Stirling</i> or on-board nuclear-powered submarines, and due to risk of nuclear accidents and impacts to local area.</li> </ul>	21

### **Response to comments**

While the call for comments was specific to the environmental assessment process for the action prescribed in the referral documentation for the SRF-West Project, and not related to broader Australian Government strategy and geopolitical events, Defence is able to provide the below response.

#### Non-proliferation of nuclear weapons – Australia's obligations and commitments

Australia does not have and will not seek to acquire nuclear weapons. Australia is committed to setting the highest non-proliferation standard for the acquisition of its conventionally armed, nuclear-powered submarines. Australia will continue to fulfil its international legal obligations, including as a non-nuclear-weapon state, under the *Treaty on the Non-Proliferation of Nuclear Weapons* (NPT) and as a party to the *South Pacific Nuclear Free Zone Treaty* (Treaty of Rarotonga). Naval nuclear propulsion is consistent with both the NPT and the Treaty of Rarotonga.

Australia's conventionally armed nuclear-powered submarine (SSN) program will occur within the framework of Australia's safeguards agreements with the International Atomic Energy Agency (IAEA), including its Comprehensive Safeguards Agreement and Additional Protocol. As part of these safeguards obligations, Australia is negotiating an arrangement with the IAEA to enable it to continue to verify there has been no diversion of nuclear material, no misuse of nuclear facilities and non-declared nuclear material or activities occurring in Australia.

A number of fundamental elements underpin our non-proliferation approach, including:

- Australia will not enrich uranium or reprocess spent fuel
- Australia will not produce nuclear fuel for its SSNs



- The UK and US intend to provide Australia with nuclear material in complete, welded power units that will not require refuelling during their lifetime; and
- The nuclear fuel that Australia receives cannot be used in nuclear weapons without further chemical processing. Such processes would require facilities that Australia does not have and will not seek. The IAEA will be able to verify the absence of these facilities at all times.

Australia, the UK and the US will work closely to ensure that all activities are fully consistent with their respective domestic law and international obligations while also recognising Australia's obligations under international law, including the NPT and Treaty of Rarotonga.

The ASA is committed to engaging with communities in Western Australia to understand their concerns and provide information about Australia's acquisition of nuclear-powered submarines. This engagement is ongoing and ensures the work to deliver nuclear-powered submarines is mindful of, and benefits, local communities.

For more information regarding the use of conventionally armed, nuclear-powered submarines please refer to the Australian Submarine Agency website <https://www.asa.gov.au/>.

## Assessment and potential impacts to local terrestrial flora and fauna

#	Theme	Summary of comments	Number of submissions referencing theme
6	Assessment and potential impacts to local terrestrial flora and fauna	<ul style="list-style-type: none"> <li>• Concern about vegetation clearing and potential impacts to habitat for birds.</li> <li>• Concern about potential impacts to range of ecological communities including sedgeland in holocene dune swales of the Swan Coastal Plain; thrombolite (microbial) community of coastal freshwater lakes of the Swan Coastal Plain (Lake Richmond); banksia woodlands of the Swan Coastal Plain; and tuart (<i>Eucalyptus Gomphocephala</i>) woodlands and forests of the Swan Coastal Plain.</li> </ul>	21

### Response to comments

#### Considerations of potential impacts to birds:

Defence assessed the potential impacts to birds, including on habitat for foraging, breeding and nesting, in the Environment and Heritage Assessment and Biodiversity Values Report, and found that potential impacts to birds is not likely.

#### Consideration of potential impacts to Threatened Ecological Communities

Potential impacts to a range of terrestrial local flora and fauna are assessed in the Environment and Heritage Assessment, including EPBC listed Threatened Ecological Communities (TEC). Ground surveys have confirmed that there are no EPBC listed TEC, WA Biodiversity Conversation Act listed TEC or WA Department of Biodiversity, Conservation and Attractions listed Priority Ecological Communities within or adjacent to the proposed action area. This includes banksia woodland of the Swan Coastal Plain ecological community.



## Radiological waste management

#	Theme	Summary of comments	Number of submissions referencing theme
7	Radiological waste management	<ul style="list-style-type: none"> <li>Concern about storage of nuclear, radioactive, radiological and low-level industrial waste at HMAS <i>Stirling</i> and impacts to safety, human health, water contamination (ground water, drinking water and ocean) and environment from spills and leakage. Some concern about consideration of impacts of sea level rise, coastal erosion and extreme weather events on management of radioactive material.</li> <li>Concern about temporary storage of radiological waste becoming long-term storage.</li> </ul>	17
<b>Response to comments</b>			
<p>As a responsible nuclear steward, Australia will manage all radiological waste from its own Virginia Class and SSN-AUKUS submarines domestically, in accordance with Australia's international legal obligations and commitments and strict limitations prescribed under Australian regulations. As the AUKUS Naval Nuclear Propulsion Agreement makes clear, Australia will be responsible for the management, storage and disposal of radioactive waste resulting from its own Virginia Class and SSN-AUKUS submarines. Australia will draw on its 70 years of experience of safely and securely managing radioactive waste from facilities like the multi-purpose nuclear reactors managed by the Australian Nuclear Science Technology Organisation (ANSTO) at Lucas Heights.</p> <p>The SRF-West initiative will help Australia build the necessary operational capabilities and skills to be sovereign ready, so Australia can safely and securely own, operate, maintain and regulate a fleet of nuclear-powered submarines from the early 2030s. Australian sailors will deploy on UK and US boats to develop at-sea experience with naval nuclear propulsion, while Australian maintenance personnel will support these submarines at shore.</p> <p>Australia will not manage, store or dispose of spent nuclear fuel or other high-level radioactive waste from the UK, US or any other country. No intermediate or high-level radiological waste, including spent nuclear fuel will be generated or stored at HMAS <i>Stirling</i>.</p> <p><u>Managing low-level waste at HMAS <i>Stirling</i></u></p> <p>Australia will manage low-level radiological waste generated through day-to-day submarine operations and maintenance of Australia's Virginia Class and SSN-AUKUS and US and UK nuclear powered submarines on rotation at HMAS <i>Stirling</i>.</p> <p>In 2024, the Australian Parliament passed legislation focused on ensuring Australia maintains the highest level of nuclear safety in respect of nuclear-powered submarines, including the establishment of a new regulatory framework, including an independent regulator, to ensure nuclear safety within Australia's nuclear-powered submarine enterprise and capability lifecycle.</p> <p>Pending the necessary approvals and licences in accordance with Australian regulations, the CIF will be constructed at HMAS <i>Stirling</i> to undertake radiological maintenance activities safely and securely. It will be a technical and engineering industrial workshop for the servicing and repair of naval nuclear propulsion components and tools.</p>			



Low-level radioactive waste will comprise waste like personal protective equipment, such as gloves, materials including wipes, as well as test equipment used during submarine maintenance. Items will be packaged appropriately and moved from the submarine to the CIF. Waste will be characterised and sorted, reduced in size, and where possible, the level of radioactivity reduced prior to temporary storage, ready for future transport once a safe and secure disposal solution is determined. A safe and secure disposal solution for radiological waste will take time to be determined, with community consultation and deep consideration of technical requirements, and will not be required until Australia's first conventionally armed nuclear-powered submarine reaches its end-of-life in the 2050s.

The proposed action is not a nuclear installation on the basis that the facility is for storage of radioactive waste with an activity level that is less than the activity level prescribed in the *Environment Protection and Biodiversity Conservation Regulations 2000*. This is calculated based on activity values for the relevant nuclides set out in Part 1 of Schedule 1 to the *Australian Radiation Protection and Nuclear Safety Regulations 2018*. ARPANSA is responsible for assessing and regulating the conditions for obtaining and maintaining a licence for all nuclear activities including safe operations, training, personnel competency management and emergency response. This includes substantive plans and detailed emergency plans.

Additional information related to this theme can be found in theme 11: Nuclear safety and the environment.



## Marine environment and seagrass protection

#	Theme	Summary of comments	Number of submissions referencing theme
8	Marine environment and seagrass protection	<ul style="list-style-type: none"> <li>Concern that seagrass protection had not been addressed.</li> <li>Concern about potential impacts to marine environmental values, ecological communities and marine species of Garden Island/<i>Meeandip</i> and Cockburn Sound/<i>Derbal Nara</i>, including seagrass meadows.</li> <li>Concern about potential impacts to spawning, breeding and nursery grounds, and fish populations as a food source for a range of marine species including pink snapper and whitebait, penguins, sea lions, dolphins and sharks, and other significant benthic communities and habitats.</li> <li>Concern about potential impacts from dredging works on seagrass and seahorses, including around Diamantina Pier and Armament Wharf, and risk of boat-strike and underwater noise impacts on dolphins and other marine species.</li> </ul>	9

### Response to comments

Defence recognises that seagrass meadows are a key ecological focus for the environmental management of Cockburn Sound/*Derbal Nara*. Defence has designed works to avoid and minimise potential impact to seagrasses. This has been informed by multiple studies and assessments. Seagrass and benthic habitats have been assessed in the Environment and Heritage Assessment, Biodiversity Values Report, and Benthic Habitat and Seagrass Values Reports completed for both Autumn and Spring. A dredge plume modelling assessment was undertaken to predict potential impacts to benthic habitats within Cockburn Sound/*Derbal Nara*. The modelling indicates there are not likely to be impacts to seagrasses from dredging. In addition, the dredge disposal areas are at depths where seagrass does not grow.

Proposed works for the Project require a small area of seagrass to be removed in the Moresby and Southern Boat Harbour disturbance areas. The area proposed for clearance represents an upper estimate, as it is likely the actual footprints of the final structure design and dredging will be less, or avoided completely if possible.

Given the small footprint of dredging proposed, the time anticipated for suspended sediment to settle and the limited duration of activities, it not likely that spawning, breeding and nursery grounds will be significantly impacted. Detailed description of this analysis is set out in the Environment and Heritage Assessment and Biodiversity Values Report for the project.

Seahorses and pipefish (*syngnathids*): Along with other marine species, potential impacts to the West Australian Seahorse and pugnosed pipefish have been considered and assessed in the environmental planning and surveys for the Project. The Framework Construction Environmental Management Plan (CEMP) details the objectives and example mitigation measures that will be developed into a CEMP by the construction contractor to manage the potential impacts of the proposed action on *syngnathids*.



## Indigenous heritage values

#	Theme	Summary of comments	Number of submissions referencing theme
9	Indigenous heritage values	<ul style="list-style-type: none"> <li>Concern about potential impacts to amenity, historical and cultural significance of area for local Indigenous people, including Whadjak people.</li> <li>Concern about level of consultation with Traditional Owners.</li> </ul>	7
<b>Response to comments</b>			
<p>Defence has a longstanding and strong track record of heritage protection across Garden Island/<i>Meeandip</i>, and takes its responsibility as stewards of heritage values seriously. Defence has conducted and is committed to ongoing, engagement with the Gnaala Karla Booja and Whadjuk people during planning and design activities, and into construction. Investigations and consultation to inform the values within the proposed action area have occurred and are continuing.</p> <p>More information about the level of consultation undertaken to date with Traditional Owners is detailed in attachment 5.1 – Consultation Outcomes Main Report A1-3 of the Preliminary Documentation.</p> <p>More information about the heritage impacts is available in the Environment and Heritage Assessment and Heritage Impact Assessment which discusses Indigenous heritage values, and the Indigenous tradition of the Crocodile and Waugal Dreaming.</p> <p>Consultation will be ongoing and is aligned to the DCCEEW <i>Interim Guidelines for Engaging with First Nations People and Communities on Assessments and Approvals (2023)</i>.</p>			

## Community consultation and EPBC Act processes

#	Theme	Summary of comments	Number of submissions referencing theme
10	Community consultation and EPBC Act process	<ul style="list-style-type: none"> <li>Concern about extent and transparency of consultation with residents in Rockingham, as well as Traditional Owners.</li> <li>Concern that consultation did not include letters, phone calls or public meetings to address concerns and respond to requests for consultation and information.</li> <li>Concerns around the short time frame for public consideration and comment.</li> <li>Concern that the Referral is only focused on short term impacts.</li> </ul>	7
<b>Response to comments</b>			
<p><u>Community Consultation</u></p> <p>Defence is committed to keeping the community and stakeholders informed, and has conducted and will continue to conduct ongoing consultation. Formal consultation conducted as part of the EPBC Act referral and assessment, the ARPANSA licensing processes, and the Parliamentary approval processes has been undertaken in accordance with statutory requirements. Face-to-face consultation sessions were held by Defence specifically for this infrastructure project in March 2024 across the cities of Kwinana, Cockburn and Rockingham, and within the City of Rockingham in May and July 2024. All consultation sessions have</p>			



been advertised in local newspapers, with Councils notified by letter. An email inbox is being maintained and monitored throughout the project's duration.

#### Methods of communication and consultation

All information about the Project is shared in plain English with maps and diagrams. The Project utilised factsheets, advertisements, display boards and a dedicated project website to update the community at each public consultation session about changes to the project and potential impacts. A range of face-to-face and online methods are used to provide opportunities for stakeholders and communities to find out more about the Project, ask questions and provide feedback. These include:

- Letters and emails to stakeholders offering briefings and meetings or providing notification of upcoming community information sessions
- Stakeholder briefings and meetings
- Drop-in information sessions
- Pop-ups in high traffic areas such as shopping centres and local markets
- A project email inbox for community and stakeholder questions and feedback.

For more information about the consultation that has been undertaken to date, please refer to the following attachments to the Preliminary Documentation:

- Att 4: Consultation Action Plan
- Att 5.1: Consultation Outcomes Main Report A1-3
- Att 5.2: Consultation Outcomes Report A4-10
- Att 18: Socio Economic Impact Assessment.

Defence and the ASA has committed to ongoing community information and consultation on the project as it continues. The ASA has established dedicated and enduring engagement teams based in Rockingham, close to HMAS *Stirling* committed to providing information about Australia's acquisition of conventionally armed nuclear-powered submarines to the local community and public. The ASA attends a range of community events in Western Australia and will continue to reach out to communities throughout the State.

Defence has been engaging with, and will continue to engage with, Traditional Owners in the Cockburn Sound/*Derbal Nara* region to identify, safeguard and mitigate impacts to cultural heritage. The Project's engagement approach is aligned to DCCEEW's 2023 *Interim Guidelines for Engaging with First Nations People and Communities on Assessments and Approvals* under the EPBC Act.



## Nuclear safety and the environment

#	Theme	Summary of comments	Number of submissions referencing theme
11	Nuclear safety and the environment	<ul style="list-style-type: none"> <li>Concern about nuclear activities including handling and storage of nuclear waste, operation of naval nuclear reactors, uranium mining and nuclear accidents, spills or leakage.</li> <li>Concerns about potential impacts of nuclear activities on public health and safety of local community in Rockingham, EPBC protected matters, and WA listed Threatened Ecological Communities.</li> </ul>	6

### Response to comments

#### Nuclear safety

In 2024, the Australian Parliament passed legislation focused on ensuring Australia maintains the highest level of nuclear safety in respect to nuclear-powered submarines, including the establishment of a new regulatory framework. The framework includes an independent regulator, to ensure nuclear safety within Australia's nuclear-powered submarine enterprise and capability lifecycle.

The Australian Naval Nuclear Power Safety Regulator will draw on the experience of the US and the UK to deliver international best practice in nuclear safety. The Regulator will independently observe, assess and certify all emergency plans and responses as fit-for-purpose, including prior to the first rotation of UK and US nuclear powered submarines from 2027.

The Regulator will be independent from the ASA, the Department of Defence and the ADF, industry partners and other potential entities responsible for managing the unique circumstances with naval nuclear propulsion. The Minister may give directions to the Regulator in very limited circumstances, if the Minister is satisfied it is in the interests of national security, and in an emergency. The Minister must table a statement in both Houses of Parliament. The nuclear safety duties imposed by the ANNPS Bill still apply and are not altered even under these limited circumstances.

Having the Regulator accountable to the Defence Minister will ensure nuclear safety in the unique context of Defence operations. This is broadly consistent with the US and UK's regulatory models, which have separate defence nuclear safety regulators.

The selection of the site for the CIF within the operational precinct at HMAS *Stirling* was driven by the requirement to manage low-level waste from the nuclear-powered submarines close to the pier where they berth and conduct maintenance activities. This limits the need to transport low-level radioactive material over long distances.

Site selection was subject to assessment by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), and a licence to prepare a site for a Prescribed Radiation Facility at HMAS *Stirling* was granted in July 2024.

#### Environmental Monitoring

In designing and delivering support facilities for Australia's sovereign conventionally armed, nuclear-powered submarines, the ASA is prioritising the highest standards of safety, security and safeguards for our people, the public and the environment.





Comprehensive radiological and environmental monitoring will be undertaken to assure the protection of people and the environment, and confirm no adverse impact on human health or the quality of the environment. Environmental baseline monitoring is being undertaken to establish a baseline radiological level prior to the stand up of SRF-West. This will then move onto a continuous environmental monitoring regime based on the baseline results and includes:

- Doses in public areas
- Water sampling
- Sediment sampling
- Biota sampling
- Airborne monitoring
- Shoreline surveys.

#### Impact of nuclear activities on EPBC listed species

The impact of nuclear activities on EPBC listed species and the broader flora and fauna of Garden Island/*Meeandip* was assessed and is set out in the Environment and Heritage Assessment. This includes the continuous environmental monitoring regime discussed above.

Additional information can be found in theme 7: Radiological waste management, and theme 2: Nuclear safety procedures.

## Pollutants, chemicals and toxic substances

#	Theme	Summary of comments	Number of submissions referencing theme
12	Pollutants, chemicals and toxic substances	<ul style="list-style-type: none"> <li>• Concern about risk of disturbing pollutants and toxic chemicals during the construction process, including PFAS, asbestos and TBT [Tributyltin], and impacts to human health and environment.</li> <li>• Concern about risks to marine fauna from chemical or oil spills.</li> </ul>	3
<b>Response to comments</b>			
<p>Detailed assessment of the potential for pollutants from marine sediments or other sources have been completed. These results inform mitigation measures where required to avoid impacts to the environment and/or health and safety. HMAS <i>Stirling</i> is an operational Defence base which already demonstrates effective management of potential risks from spills, pollution or contamination.</p> <p>Dredging for the Project will involve the management and handling of marine sediments. Sampling of this material has been undertaken in line with the <i>National Assessment Guidelines for Dredging 2009</i> (DCCEEW) and <i>Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000</i> (ANZECC and ARMCANZ) to inform appropriate disposal management requirements. A risk assessment was undertaken to inform the risks to marine life from PFAS in marine sediments to be dredged, and concluded that risks associated with PFAS from dredging and disposal to the designated spoil grounds is low.</p> <p>The potential risk and impact of chemical, fuel and oil spills is assessed in the Environment and Heritage Assessment. To avoid and mitigate risks during construction, a spill management plan will be implemented within the Construction Environment Management Plan for the Project.</p>			



## Economic and employment factors

#	Feedback theme	Summary of feedback	Number of submissions referencing theme
13	Economic and employment factors	<ul style="list-style-type: none"> <li>Concern about potential impact of infrastructure works on tourism.</li> </ul>	3
<b>Response to comments</b>			
<p>The proposed action area under assessment is located on Garden Island/<i>Meeandip</i> and the nearshore environment immediately adjacent to the coastline. All SRF-West works are in naval waters and on the base, which are not accessible by the public. Impacts to marine fauna and habitat are assessed and management strategies are presented in the Environment and Heritage Assessment.</p> <p>The Environment and Heritage Assessment addresses potential impacts to people and communities, with an understanding of tourism as a local economic driver. The Project is not expected to impact tourism opportunities available to the region, including the Shoalwater Islands Marine Park.</p>			

## Housing

#	Theme	Summary of comments	Number of submissions referencing theme
14	Housing	<ul style="list-style-type: none"> <li>Concern around existing housing availability and affordability and lack of Government investment in Defence housing to offset the increase in workforce housing requirements.</li> <li>Concern about ensuring housing and accommodation supply, in a market already under pressure in terms of affordability and availability for local community.</li> </ul>	3
<b>Response to comments</b>			
<p>Defence is committed to working with community and local councils to ensure potential impacts are minimised, and take into consideration the local housing market. Defence Housing Australia (DHA) has signed contracts with Western Australian businesses to deliver 550 additional new residences for Defence personnel and their families over the next 5 years. The new homes will be leased to DHA and provide accommodation close to HMAS <i>Stirling</i>.</p> <p>These agreements form part of DHA's New Builds Volume Leasing Program and importantly will see developer Parcel Property, alongside local home builders Forma Homes and Plunkett Homes, expand local housing supplies. The agreements follow an expression of interest period seeking industry participants who can deliver new properties using their own land, land sourced from the market, or a combination of both. Defence is also constructing additional on-island accommodation for Australian and international service members.</p>			



## Recreational fishing and access

#	Theme	Summary of comments	Number of submissions referencing theme
15	Recreational fishing and access	<ul style="list-style-type: none"> <li>Concern about potential impacts to recreational access for diving, in particular access to Point Peron, water quality, undersea noise and boat strikes.</li> <li>Opposition to development on Garden Island/<i>Meeandip</i>, including tourism activities.</li> </ul>	2
<b>Response to comments</b>			
<u>Continued access for recreational activities</u>			
<p>The Project does not propose any changes to how access to Garden Island/<i>Meeandip</i> is currently managed. All SRF-West works are in naval waters and on the base, which are not accessible by the public. HMAS <i>Stirling</i> and other Defence establishments occupy approximately 30% of Garden Island/<i>Meeandip</i>, with the remaining 70% available to the public. The areas occupied by Defence are restricted areas. The public areas are accessible to the general public during daylight hours by boat, via designated shorelines. The publicly accessible areas are managed by Defence for purposes of nature, conservation and passive forms of recreation.</p> <p>As there are no vessel movements included west of the causeway, there is no potential risk of boat strikes or vessel interactions with divers at Point Peron. Assessments for dredging and noise show it is unlikely there will be increased sediment/silt at Point Peron or noticeable noise impacts.</p>			

## Nuclear technology

#	Theme	Summary of comments	Number of submissions referencing theme
16	Nuclear technology	<ul style="list-style-type: none"> <li>Opposed to pursuit of nuclear energy instead of transition to renewable energy.</li> <li>Concern that there has not been factual information about the risks and dangers of nuclear waste and nuclear reactors.</li> </ul>	2
<b>Response to comments</b>			
<p>The pursuit of nuclear energy is not related to the Project.</p> <p>Information on potential risks and dangers of nuclear waste and nuclear reactors is provided by ARPANSA. ARPANSA is responsible for assessing and regulating the conditions for obtaining and maintaining a licence for all nuclear activities including safe operations, training, personnel competency management and emergency response. This includes substantive plans and detailed emergency plans.</p> <p>The ASA and Defence will continue regular community engagement to understand and address questions and concerns in the community, particularly around nuclear technology.</p>			



## Traffic

#	Theme	Summary of comments	Number of submissions referencing theme
17	Traffic	<ul style="list-style-type: none"> <li>Concern about congestion, existing impacts of traffic and oversized vehicles on local roads around Peron - particularly Parkin Street - and impact of the Project.</li> <li>Welcomed Defence's recent recognition of importance of adequate transport and local road upgrades, as reported in a Rockingham City Council newsletter.</li> </ul>	2
<b>Response to comments</b>			
<p>Defence recognises the importance of adequate transport planning and local road upgrades in line with the increase in Defence activities at HMAS <i>Stirling</i>. As such, Defence is working closely with the City of Rockingham and WA State Government on transport studies, including identifying opportunities for road upgrades to improve traffic flow for the local community. This cooperation includes a specific study on the Cape Peron Transport Needs that has been developed by the City of Rockingham under the Cape Peron Planning Investigation Area. Defence will ensure construction traffic is appropriately managed and reduced during the construction period. Traffic considerations are identified in the Environment and Heritage Assessment, and Defence will be developing a traffic management plan to avoid and mitigate impacts.</p>			



## 6 Conclusion

Engaging with all stakeholders, including the community, is an important part of Defence's planning, design, and statutory approval processes. Defence is committed to ensuring all stakeholders remain informed and heard, and that engagement continues as the SRF-West Infrastructure Project progresses.

All public comments received on the EPBC Act Preliminary Documentation assessment package have been carefully reviewed and considered, and have been provided to DCCEEW in line with statutory obligations.

Defence will continue to engage stakeholders as the Project progresses, and wishes to thank the community for their interest in this important project.



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