

July 2025

Submarine Construction Yard Environmental Impact Statement

Response Document

Planning, Development and Infrastructure Act 2016

AUSTRALIAN NAVAL INFRASTRUCTURE





Environmental Impact Statement Response Document

We acknowledge and pay our respects to the Traditional Owners, the Kurna people of the Adelaide Plains. It is upon their ancestral lands that the development is proposed.

We pay respect to Elders past and present. We respect their spiritual beliefs and connection to land, waters and culture which are of continuing importance to the living Kurna people today. We further acknowledge the contribution and important role that First Nations people continue to play in our shared community.

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Contents

1.	Response Document.....	1
1.1	Purpose	1
1.2	EIS Process Next Steps	3
2.	Background to the SCY and EIS.....	4
2.1	Background to the SCY.....	4
2.2	The Development.....	4
2.3	Summary of the EIS Findings.....	6
3.	Engagement Approach.....	3
3.1	Purpose of the Engagement	3
3.2	Impact Assessed Engagement Requirements	4
3.3	Engagement Activities	4
3.4	Concurrent ASA engagement.....	7
4.	Engagement Outcomes Summary	8
5.	State Government, Agency and Local Council Feedback	10
5.1	Written Submissions	10
6.	Community Feedback.....	16
6.1	Written Submissions and PlanSA Forms	16
6.2	Online Survey	25
6.3	Drop-in Sessions.....	42
6.4	General Enquiries.....	43
7.	Our Response and Recommendations	44
7.1	Clarification on Nuclear-Related Matters, Capital Dredging and Out of Scope Matters	44
7.2	Community Feedback	48
7.3	Key Stakeholder Feedback	65
8.	Conclusion.....	73
8.1	Summary	73
8.2	Additional Information Provided	74
	Appendix A – Engagement Collateral.....	95

Appendix B – PlanSA Form	96
Appendix C – YourSAy Survey	97
Appendix D – Response to Agencies	98
Aboriginal Affairs and Reconciliation	98
Department for Environment and Water.....	100
Department for Health and Wellbeing.....	130
Department for Infrastructure and Transport	133
Department of Primary Industries and Regions.....	139
Environment Protection Authority.....	152
South Australian Metropolitan Fire Service	161
South Australian Police	163
Native Vegetation Council.....	166
Appendix E – Technical Reports	172

Acronyms

Acronym	In full
ADS	Adelaide Dolphin Sanctuary
ADS Act	<i>Adelaide Dolphin Sanctuary Act 2005</i>
AEP	Annual Exceedance Probability
AH Act	<i>Aboriginal Heritage Act 1988</i>
AHD	Australian Height Datum
ANI	Australian Naval Infrastructure Pty Ltd
AQMP	Air Quality Management Plan
ARPANS Act	<i>Australian Radiation Protection and Nuclear Safety Act 1998</i>
ARPANSA	Australian Radiation Protection and Nuclear Safety Agency
ANNPA	Australian Naval Nuclear Power Safety Act 2024
ANNPSR	Australian Naval Nuclear Power Safety Regulator
ASA	Australian Submarine Agency
ASS	Acid Sulfate Soils
ASSMP	Acid Sulfate Soil Management Plan
BMP	Biosecurity Management Plan
CAQMP	Construction Air Quality Management Plan
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CT	Certificate of Title
CTMP	Construction Traffic Management Plan
CWMP	Construction Waste Management Plan
DA	Development Application
dB	Decibels
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEW	Department for Environment and Water
DIT	Department for Transport and Infrastructure
DMP	Dredge Management Plan
DMPA	Dredge Material Placement Area
EIA	Environmental Impact Assessment

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Acronym	In full
EIS	Environmental Impact Statement
EP Act	<i>Environment Protection Act 1993</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment, Protection and Biodiversity Conservation Act 1999 (cth)</i>
GGERS	Greenhouse Gas Emissions Reduction Strategy
GHG	Greenhouse Gas
IAEA	International Atomic Energy Agency
KV	Kilovolt
MCEMP	Marine and Coastal Environmental Management Plan
Minister	Minister for Planning
NEPM	National Environment Protection Measure
NPW Act	<i>National Parks and Wildlife Act 1972</i>
NSRP	Nuclear Stream Rising Plant
NV Act	<i>Native Vegetation Act 1991</i>
OEMP	Operational Environmental Management Plan
ONS	Osborne Naval Shipyard
PASS	Potential Acid Sulfate Soils
PDI Act	<i>Planning, Development and Infrastructure Act 2016</i>
PDI Regulations	<i>Planning, Development and Infrastructure (General) Regulations 2016</i>
PIRSA	Primary Industries and Regions South Australia
PM	Particulate Matter
PPE	Personal Protective Equipment
SAQP	Sampling Analysis and Quality Plans
SCAP	State Commission Assessment Panel
SCY	Submarine Construction Yard
SEB	Significant Environmental Benefit
SECMP	Soil, Erosion and Contamination Management Plan
SIA	Social Impact Assessment
SMP	Stormwater Management Plan
SPPs	State Planning Policies

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Acronym	In full
SSIEPs	State Significant Industrial Employment Precincts
SSN-AUKUS	Submersible Ship Nuclear
STEM	Science, Technology, Engineering, Maths
TFFMP	Terrestrial Flora and Fauna Management Plan
TMP	Traffic Management Plan
WMMP	Waste Management and Minimisation Plan
WSUD	Water Sensitive Urban Design

Glossary

Term or phrase	Meaning
Assessment Requirements	The project specific assessment requirements set by the State Planning Commission which identify the major potential issues associated with the development which the EIS should address
AUKUS	Trilateral security partnership between Australia, the United Kingdom, and the United States of America.
Baseline	Existing baseline: conditions that currently exist within the development site and surrounds. Future baseline: the likely evolution of the baseline conditions without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort based on the availability of environmental, social and economic information and scientific knowledge.
Commission	State Planning Commission
Conditions (of approval)	A requirement imposed by a relevant authority as part of a development approval under the PDI Act. Conditions must be satisfied in the delivery of the development.
Cumulative effect	Potential cumulative effects are categorised into two types: <ul style="list-style-type: none"> • Intra-project effects: The combined effects of individual effects resultant from the development upon a set of defined sensitive receptors, for example, noise, dust and visual effects; and • Inter-project effects: The combined effects arising from another project(s), which individually might be insignificant, but when considered together, could create a significant cumulative effect. For example, dust effects from multiple construction sites affecting the same receptor.
Dewatering	The removal of water from a location.
Development	The nuclear-powered Submarine Construction Yard development as assessed for the purpose of the environmental impact assessment in the Environmental Impact Statement – ie. Area 1, 2 and 3 and associated construction and operation of these areas.
Development site	The site area assessed for the purpose of the environmental impact assessment in the Environmental Impact Statement – ie. Area 1, 2 and 3.
Effect	Used to express the consequence of an impact (refer definition for impact). For example, removal of underlying soils (impact) has the potential to disturb underlying buried heritage receptors (effect).

Term or phrase	Meaning
Environmental Impact Statement	This document is the Environmental Impact Statement (EIS). The EIS process is the highest level of assessment under the <i>Planning, Development and Infrastructure Act 2016 (PDI Act)</i> and enables the holistic consideration of projects that are considered to be of economic, social or environmental importance to South Australia.
Environmental Impact Assessment	The Environmental Impact Assessment (EIA) process provides a comprehensive assessment of a development or project proposal and the expected effects on the receiving environment and within the broader context of its setting, which could relate to a local area, region, state or nation.
Impact	<p>A change that is caused by an action. For example, excavation works would lead to a removal of underlying soils (impact).</p> <p>There are multiple types of impact:</p> <ul style="list-style-type: none"> • Direct impact: an event or circumstance that is caused by the action. • Indirect impact: an event or circumstance that is substantially caused by the action. • Facilitated impact: an event or circumstance that occurs because of a separate and unrelated party (that is, not related to the person that took the original action) undertaking a separate action that is able to occur because the original action occurred. • Cumulative impact: the effect of the action in combination with other known development impacts, or other projects or activities to occur concurrently in the region of the development.
Impact Assessed Development	On 15 February 2024, the Minister for Planning declared that the proposed development of a Nuclear-Powered Submarine Construction Yard (SCY) by proponent Australian Naval Infrastructure Pty Ltd at Osborne (subject land identified in Figure 1.1) be assessed as an Impact Assessed development pursuant to section 108(1)(c) of the <i>Planning, Development and Infrastructure Act 2016</i> .
Land-based portion of the development site	The terrestrial portion of the development site, located outside of the Port River.
Magnitude of impact	Magnitude of impact takes into account the spatial extent, duration, frequency and reversibility of an impact.
Marine-based portion of the development site	The portion of the development site located within the Port River.

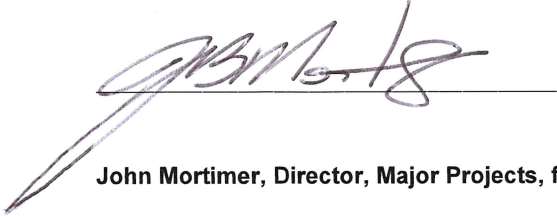
Term or phrase	Meaning
Mitigation measures	<p>Measures that aim to avoid, reduce, or offset potential adverse effects and maximise potential beneficial effects.</p> <p>There are several categories of mitigation measures considered in the EIS:</p> <ul style="list-style-type: none"> • Inherent mitigation measures - those which are modifications to the location or design of the development during the pre-application phase that are 'designed in' or an inherent part of the development and do not require additional action to be taken. • Additional mitigation measures - those that require further action to be taken to achieve the anticipated outcome or those that require a controlling mechanism or legal undertaking to be implemented, but are under the control of the ANI, the Contractor (during construction), the Shipbuilder (during operation) or statutory agencies, e.g. Monitoring and Reporting; Operating Procedures; Agreements; Separate Licenses and Approvals; and Stakeholder Engagement and Agreements. • Standard mitigation measures – those that would occur notwithstanding the EIA to meet with legislative requirements or standard practices, e.g. construction mitigation with a high degree of certainty over delivery, e.g. measures to be included in the Construction Environmental Management Plan ('CEMP'). <p>Inherent and standard mitigation measures are considered as 'embedded mitigation' for the EIA.</p>
Nuclear-powered propulsion system	Nuclear power units (reactors) that will be sourced from overseas to provide submarines power for the entire design life of the vessel. Also known as the nuclear steam raising plant (NSRP).
Optimal pathway	Timing and phasing to achieve the construction and delivery of the nuclear-powered submarines.
Osborne Naval Shipyard	Refers to the Osborne Naval Shipyard facilities currently under operation and in construction on property administered by Australian Naval Infrastructure.
Practise Direction 17	Rules for the assessment process for impact assessed development applications.
Project	The entire SSN-AUKUS submarine project, including all works required to support Australia to acquire conventionally-armed nuclear-powered submarines. The scope of the project is larger than that of the development assessed in the Environmental Impact Statement.
Residual effects	Residual effects are those that remain following the consideration of mitigation within the assessment (i.e., once all Embedded Mitigation and secondary mitigation is taken into account).

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Term or phrase	Meaning
Sensitive receiver	<p>Sensitive receivers are affected persons, premises or matters. They can include:</p> <ul style="list-style-type: none">• Human beings (e.g. existing surrounding residential / future site users).• Built resources (e.g. houses, buildings, heritage structures, other premises or open areas).• Natural resources (e.g. plants, animals or ecosystems).
Significance of effect	<p>'Significance' reflects the relationship between the magnitude of an impact and the sensitivity (or value) of the affected resource or receptor.</p>
SSN-AUKUS	<p>A planned class of nuclear-powered fleet submarine intended to enter service with the United Kingdom's Royal Navy in the late 2030s and Royal Australian Navy in the 2040s.</p>
Subject site	<p>The site area gazetted on 15 February 2024 when the development was declared as an Impact Assessed development. This area is larger than that actually assessed in the Environmental Impact Statement due to change in scope of the development following gazettal.</p>

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Approved by the Designated Entity:

A handwritten signature in black ink, appearing to read 'J Mortimer', is written over a horizontal line. The signature is stylized and cursive.

John Mortimer, Director, Major Projects, for and on behalf of Australian Naval Infrastructure

Date: 7 August 2025

1. Response Document

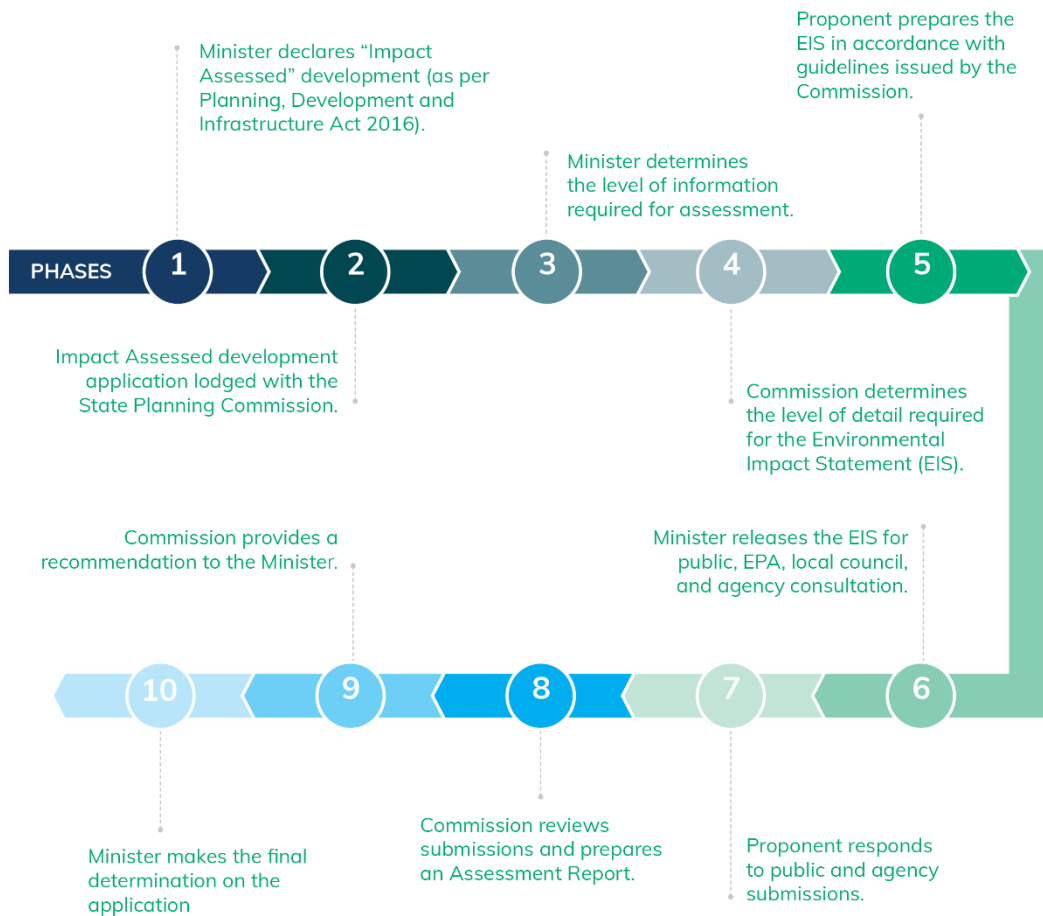
1.1 Purpose

On 14 March 2023, the Commonwealth Government announced the acquisition of a conventionally armed nuclear-powered submarine capability for Australia, and that a preferred site for the nuclear-powered submarine construction yard had been identified at Osborne, South Australia.

The site is adjacent the existing Osborne Naval Shipyard (ONS), which is the most advanced and modern shipbuilding hub in Australia and is owned and managed by Australian Naval Infrastructure (ANI).

On 15 February 2024, the Minister for Planning declared the preferred site for the Nuclear-Powered Submarine Construction Yard (SCY or development) as an Impact Assessed development under section 108 (1)(c) of the *Planning, Development and Infrastructure Act 2016* (PDI Act). The Impact Assessed development process is outlined below:

Figure 1: NPSCY Impact Assessed development process



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The Impact Assessed pathway is the most rigorous level of development assessment in South Australia. It is reserved for major projects of economic, social or environmental importance to the State. The proposal included the following components:

- Development associated with the construction and operation of the SCY.
- Development associated with any change in the use of land and coastal waters.
- Development associated with the construction, installation or provision of specified infrastructure, facilities and services.
- Development associated with any excavation or filling of land associated with any development.
- Development associated with the division of land associated with the development.
- Any related or ancillary development.

A key component of the Impact Assessed process is the preparation of an Environmental Impact Statement (EIS) which addresses the expected environmental, social and economic impacts and effects of the proposed development.

An EIS was prepared by URPS and a team of technical specialists on behalf of ANI (the Proponent) for the SCY in 2024 and made publicly available for 30 business days, in line with Regulation 71 of the *Planning, Development and Infrastructure (General) Regulations 2017* (the PDI Regulations), in early 2025, Wednesday 3 February 2025 to Monday 17 March 2025, to ensure the community had an opportunity to understand and provide their feedback.

As the Designated Entity and Proponent for the EIS, ANI engaged URPS' Engagement Team to design, manage and implement a suitable engagement process. Public consultation was completed on 17 March 2025.

This formal response document (the Response Document) has been prepared in accordance with Section 113(8) of the PDI Act to respond to, (a) matters raised by a Minister, and any authority or body specified by the Minister, for consideration by the Proponent; and (b) all submissions referred to the Proponent under subsection 7 of Section 113. At the direction of the PlanSA, copies of submissions received under subsection 7 of Section 113 are not included in this Response Document. Redacted versions of these submissions will be published separately by PlanSA alongside this Response Document on the PlanSA [Portal](#).

As such, the Response Document includes:

- Details of the engagement process undertaken.
- A summary of the feedback received under subsection 7 of Section 113.
- A response to the feedback.

This Response Document, therefore, represents the Proponent's written response to the EIS submissions. In preparing the Response Document, similar issues raised across multiple submissions have been addressed collectively by topic, rather than individually. This approach

minimizes duplication and repetition throughout the Response Document, this is outlined in further detail within Section 3 to 6.

Additionally, it is important to acknowledge here that there have been no amendments to the findings of the significance of effects assessment within the EIS nor any changes or amendments to the SCY development as a result of the feedback received and matters raised during the engagement process. However, some feedback has been addressed through suggested conditions or reserved matters on the development approval, and additional clarification on key topics provided.

ANI, as the Designated Entity has signed and adopted this Response Document, which will be submitted to the Minister. The Minister must consider this Response Document when deciding whether to grant a development authorisation under Section 115 of the PDI Act.

1.2 EIS Process Next Steps

The EIS, within Section 3.2 of Chapter 3: Legislation and Procedural Requirements, outlined the EIS process under the PDI Act, which also included a breakdown of the key steps for the EIS process.

The key steps are replicated below, and Figure 1 above, noting that consultation on the EIS and preparation of the Response Document are now completed. The next step in the process is the Preparation of Assessment Report by the State Planning Commission.

- ✓ Declaration by the Minister for Planning.
- ✓ Preparation of a Scoping Development Application by the applicant.
- ✓ Preparation of assessment criteria by the State Planning Commission.
- ✓ Preparation of an EIS that responds to the assessment criteria (this document) by the State Planning Commission.
- ✓ Consultation on the EIS (public, councils, agencies).
- ✓ Response to public comment and preparation/review of Response Document by applicant.
- Preparation of Assessment Report by the State Planning Commission.
- Recommendation to the Minister for Planning.
- Decision by the Minister for Planning.
- Variations following decision / Satisfy conditions and reserve matters.

2. Background to the SCY and EIS

2.1 Background to the SCY

The background to the AUKUS trilateral security partnership (AUKUS) is outlined within Chapter 1: Introduction and Need for the Development (Chapter 1) of the EIS. The AUKUS partners agreed to support Australia to acquire conventionally-armed nuclear-powered submarines to meet Australia's defence requirements for future decades. Australia will begin building its first SSN-AUKUS in Adelaide, South Australia, by the end of this decade. Australia plans to deliver the first Australian-built SSN-AUKUS to the Royal Australian Navy in the early 2040's¹.

SSN-AUKUS will incorporate the best submarine technology from all three nations to deliver a world-class submarine. SSN-AUKUS will be operated by both the UK and Australian Navies, and will be equipped for intelligence, surveillance, under-sea warfare and strike missions. They will enhance the ability of our three nations to deter aggression and contribute to stability in the Indo-Pacific and globally.

Importantly, the United Kingdom and United States have demonstrated operation of more than 500 naval nuclear reactors that have collectively travelled more than 150 million miles without incident or adverse effect on human health or the quality of the environment. A sophisticated security and safety architecture will surround Australia's nuclear-powered submarine program to uphold these same standards².

The preferred site for construction of the SCY is near the existing ONS facility, about 19km north-west of the Adelaide CBD, on the north-eastern side of the Lefevre Peninsula (the subject site).

As noted within Section 1.8 of Chapter 1 of the EIS, the Project partners for SCY include ANI, the Australian Submarine Agency (ASA) and The Shipbuilder (a Joint Venture between ASC Pty Ltd and BAE Systems). Collectively, the Project partners will design, construct and operate the SCY on behalf of the Commonwealth of Australia.

2.2 The Development

Chapter 2: Description of the Development (Chapter 2) of the EIS provides a description of the development which forms the basis of the EIS. The development is expected to require more than 50 buildings on the subject site providing a range of manufacturing and associated activities including fabrication, welding, painting, warehousing, storage, assembly and testing, general workshop operations and component fit out.

The development is structured into three key areas as shown as shown in Figure 2 below, consisting of:

¹ Australian Submarine Agency 2024, AUKUS, accessed via <https://www.asa.gov.au/aukus>

² The White House 2023, FACT SHEET: Trilateral Australia-UK-US Partnership on Nuclear-Powered Submarines, accessed via <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2023/03/13/fact-sheet-trilateral-australia-uk-us-partnership-on-nuclear-powered-submarines/>

- Submarine fabrication (Area 1) which includes buildings and workshops to manufacture submarine components.
- Submarine outfitting (Area 2) which includes buildings used to fit out the submarine sections.
- Submarine consolidation, launching, testing and commissioning (Area 3) which includes a launch facility and wharf.

Figure 2: Area 1, 2, and 3 of the Subject Site



Section 2.7 of Chapter 2 provides an overview of the anticipated construction process across the subject site. Construction of the development is expected to take approximately 10 years with works commencing in 2025, subject to development authorisation being granted. Three main phases (Figure 3) of construction works are expected:

- Phase 1 - Site Establishment and Preparation Works - This involves site establishment works, bulk earthworks and services to make the subject site ready for construction and includes excavation, piling, services and drainage.
- Phase 2 - Onshore Construction - This involves construction of onshore infrastructure (such as services, roads and carparks, lighting, security, submarine launch facility, wet basin and wharf) and buildings (such as warehouses, offices, commercial canteen, health centre and other amenities).

the potential to exceed the capacity of certain existing roads in the area if appropriate management strategies are not adopted. Whilst identified within the EIS, operational traffic impacts are not anticipated to be fully realised until the SCY is fully operational, expected late 2030's, and, as a result there is opportunity and time to plan for anticipated potential changes to traffic.

The EIS recommended that traffic and transport options be progressed in partnership with Commonwealth, State and Local Government Agencies to increase capacity to cater for this additional demand and consider operational measures to reduce traffic generation.

Opportunities to minimise potential traffic noise impacts will also be considered during the development of new traffic and transport options in accordance with the South Australian Department for Infrastructure and Transport (DIT) Road Traffic Noise Guidelines.

2.3.2 Local, Regional and State Economies

There are significant long- and short-term benefits to the South Australian economy through construction and operation of the development, however to maximise these, the EIS identifies the need for the development's skilled labour and land requirements to be realised.

To address this, the Commonwealth and South Australian Government are working collaboratively to develop a new Skills and Training Academy Campus at Osborne, increase university places targeted at STEM disciplines as well as a range of other measures to grow the submarine and naval shipbuilding workforce including developing skills required for the construction of the SSN-AUKUS submarines.

2.3.3 Construction Noise

During construction, the EIS identifies that some nearby properties could experience short-term noise effects during the daytime, however this is manageable within acceptable limits and expected for a development of this size and scale.

3. Engagement Approach

URPS prepared an Engagement Plan on behalf of the Designated Entity that covered both the statutory and non-statutory engagement aspects to be delivered as part of the EIS assessment process.

The engagement approach was designed specifically for the EIS in response to the needs of the identified stakeholders and community. This approach focused on delivering information through multiple channels and encouraging meaningful participation through accessible and inclusive feedback mechanisms.

The engagement activities outlined in Section 3.3 occurred as set out in the Engagement Plan.

3.1 Purpose of the Engagement

The purpose of the engagement was to ensure that key stakeholders were able to provide feedback on the EIS, prior to its finalisation. The identified stakeholders included State Government departments, City of Port Adelaide Enfield, City of Salisbury and City of Charles Sturt, local Members of Parliament, First Nation stakeholders, neighbours of the development area and the broader community.

The community engagement specifically sought to:

- Raise awareness about the SCY project;
- Provide details about the SCY and the requirements of the Impact Assessment pathway;
- Provide information about the potential impacts of constructing and operating the SCY at the subject site (including specific details of the proposed changes);
- Allow the community and stakeholders to understand the potential implications of the proposed SCY, and any impacts this may have on them;
- Provide an opportunity for stakeholders and community to identify issues and opportunities, so that they can be considered in finalising the EIS;
- Enable stakeholders and community to provide feedback on the EIS and for that feedback to be submitted to the State Planning Commission and considered by the Minister for Planning;
- Meet statutory requirements as they relate to engagement on an Impact Assessed developments;
- Close the loop with stakeholders and community to inform them of the outcomes of the engagement process, via this Response Document, and how they can access the final version of the EIS; and,
- Build relationships to support future activities (i.e. construction) at the subject site.

URPS worked with ANI and PlanSA to facilitate the engagement process undertaken over six weeks from Wednesday 3 February 2025 to 5pm Monday 17 March 2025.

3.2 Impact Assessed Engagement Requirements

The Impacted Assessed development engagement process includes both statutory and non-statutory elements.

The statutory elements are specified in section 113 (5)(b) of the PDI Act, and Part 2 (7) of Practice Direction 17, and outline that:

- A copy of the EIS is published on the SA Planning Portal;
- The EIS must be made available for public inspection and purchase for a period of at least 30 business days;
- An advertisement/public notice in The Advertiser and local newspapers;
- Invite interested persons to make written submissions; and,
- Any other requirements specified by the Minister.

All statutory consultation requirements have been met.

Additional non-statutory elements of this engagement were designed in accordance with the Community Engagement Charter and Engagement Plan. They are outlined in Section 3.3 below.

3.3 Engagement Activities

ANI supplemented the statutory engagement process with a range of initiatives designed to enhance the level of awareness within the community, such as through a direct letter box drop and the design of several project specific fact sheets. The executive summary of the EIS was also drafted in plain English to help stakeholders understand the key project impacts.

The engagement activities undertaken for the EIS are summarised in Table 3.1.

Table 3.1: Engagement activities

Activity	Description/objectives	Stakeholder
YourSAy website and PlanSA Portal	The YourSAy website was used as the ‘one stop shop’ webpage for all details relating to the EIS including engagement collateral and submission information. The PlanSA Portal also listed information under its Impacted Assessed Development webpage.	All audiences
Fact sheets and FAQs	Two fact sheets were prepared to explain the EIS and outline its findings, including the residual significant effects of traffic, economic and noise impacts.	All audiences

	<p>Two frequently asked question sheets were prepared to answer general queries about the EIS and the impacted assessment process.</p> <p>All collateral was made available to stakeholders, local property owners, and the wider community via the YourSAy website and available in hard copy at the community drop-in sessions.</p> <p>The documents were written in plain English and used images and infographics to clearly explain the EIS process, and the potential impacts of the SCY development, so that stakeholders were well informed and understood the process. These documents can be found in Appendix A.</p>	
<p>Letterbox drop</p>	<p>The EIS factsheet was letterbox dropped to 2300 properties on the Lefevre peninsula covering Victoria Road, Osborne Road and Lady Gowie Drive from Largs Bay to Outer Harbour. A map of the letterbox distribution area is included in Appendix A.</p>	<p>Local property occupiers</p>
<p>Direct mail / Electronic Direct Mail (EDM)</p>	<p>PlanSA distributed a direct mail letter to MPs, service providers and other key stakeholders such as government agencies and council. The EIS fact sheet was included with the distribution.</p> <p>A YourSAy EDM was sent to subscribers promoting the EIS consultation.</p> <p>A copy of the stakeholder letter and EDM is included in Appendix A.</p>	<p>Charles Sturt Council, Government Agencies, utility providers, State and Federal MPs.</p>
<p>Public Notice</p>	<p>A public notice was published in The Advertiser newspaper on Monday 3 February 2025 to promote the opening of the consultation period, community drop-in dates and how to make a submission. A copy of the public notice is included in Appendix A.</p>	<p>All audiences</p>

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Stakeholder meetings	<p>In person meetings were undertaken with key stakeholders to provide an opportunity to discuss the EIS.</p> <p>The Proponent has held meetings with the following Stakeholders:</p> <ul style="list-style-type: none">• City of Port Adelaide Enfield staff;• City of Sailsbury staff;• Environment Protection Agency staff;• Department for Infrastructure and Transport; and,• Department for Environment and Water.	<p>Councils, Government Agencies, utility providers, State and Federal MPs.</p>
Online survey	<p>A link to an online survey was included on the YourSAy website to obtain specific feedback about elements of the EIS.</p> <p>158 survey responses were received.</p>	<p>All audiences</p>
Written Submissions	<p>Key stakeholders, community groups and members of the community could provide their feedback via written submission.</p> <p>12 written submissions were received from key stakeholders (i.e. government agencies and council).</p> <p>18 written submissions were received from other non-government/business organisations (2), community/environment groups (7) and individuals (9).</p>	
Submission form	<p>The PlanSA website included an online submission form to provide feedback on the EIS.</p> <p>4 PlanSA submission forms were received.</p>	<p>All audiences</p>

<p>Drop-in sessions</p>	<p>Four 2-hour drop-in sessions were held at three public venues: The State Library, Port Adelaide Plaza and Lefevre Community Stadium to enable members of the broader community to ask questions and discuss the EIS directly with members of the project team.</p> <p>156 people attended the four drop-in events.</p>	<p>Community group members, local property owners/occupiers and members of the public</p>
<p>Hard copy for public view and purchase</p>	<p>A hard copy of the EIS, Executive Summary and Investigations were made available at the Port Adelaide library and at Planning and Land Use Services for members of the public to view. Hard copies were also available to purchase on request and on display at the drop-in sessions.</p>	<p>All audiences / residents near the development.</p>
<p>Email and Phone enquiries</p>	<p>PlanSA staff were available to receive feedback or enquiries by phone and email throughout the engagement period.</p>	<p>All audiences</p>
<p>Feedback acknowledgement</p>	<p>An automatic acknowledgement of feedback received was sent to all who provided a submission.</p>	<p>Those who provided feedback</p>
<p>What we heard report</p>	<p>A ‘What We Heard Report’ will be published on the YourSAY website and distributed to engagement participants prior to the final determination of the EIS.</p>	<p>Those who provided feedback</p>

3.4 Concurrent ASA engagement

Commonwealth agency, the Australian Submarine Agency (ASA) conducted concurrent engagement via a separate [strategic assessment process](#) to consider and assess the impacts of the Nuclear-Powered Submarine Construction Yard’s development and operations on nationally and internationally listed plants, animals, habitats and places under *the [Environment Protection and Biodiversity Conservation Act 1999](#)*.

This engagement was undertaken during the same timeframe as the EIS public consultation period from 3 February 2025 to 17 March 2025. This included joint attendance at the community drop-in sessions outlined above within Table 3.1. Submissions received as part of the EIS consultation that commented on the strategic assessment were shared with ASA.

4. Engagement Outcomes Summary

The engagement approach for this EIS was designed to provide multiple ways for information to be accessed and feedback to be provided. Both targeted and broad communications methods were used.

A total of **187 submissions** were received consisting of **12 government agency submissions** and **175 businesses, community group or individual submissions** during the engagement period broken down as shown below. Overall the number of responses was considered moderate despite the level of direct engagement and notification:



12 written submissions were received from government agencies and a local council, namely:

- Aboriginal Affairs and Reconciliation
- Department for Environment and Water
- Department for Health and Wellbeing
- Department for Infrastructure and Transport
- Department of the Premier and Cabinet
- Department of Primary Industries and Regions
- Environment Protection Authority
- Minister responsible for the Adelaide Dolphin Sanctuary (ADS)
- City of Port Adelaide Enfield council
- South Australian Metropolitan Fire Service
- South Australian Police
- Native Vegetation Council

In addition, the following government agencies were consultant, but no formal response was received:

- MaDSA,
- Safework SA,
- Department for Energy and Mining,
- Coast Protection Board
- Defence SA
- Department of State Development,

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- Renewal SA,
- Australian Rail Track Corporation, and
- Department of Climate Change, Energy, the Environment and Water.



18 written submissions were received from businesses, community groups and individual members of the community.*



158 online YourSAy surveys were completed.*



4 online PlanSA submission forms were submitted.*



2 email enquiries from community members were received and responded to by PlanSA during the engagement period.



156 community members attended 4 face-to-face drop-in sessions where they provided verbal feedback and had the opportunity to ask questions of the project team.

ANI and URPS also met with staff from the following government agencies and local councils during the engagement period to discuss aspects of the EIS:

- City of Port Adelaide Enfield - 18 February 2025,
- Environment Protection Authority - 26 February and 11 March 2025
- Department of Environment and Water - 26 February 2025.

* note: some community members made submissions via multiple channels.

The feedback from stakeholders and community groups/members is discussed in Sections 5 and 6. Copies of the submission forms are appended to this report as follows:

- Appendix B contains a copy of the PlanSA submission form.
- Appendix C contains a copy of the online YourSAy survey.

5. State Government, Agency and Local Council Feedback

The following section provides a summary of the feedback received from State Government departments, other State Agencies and the local Council.

State Government departments, other State Agencies and the local Council were **generally supportive** of the EIS, noting that a variety of technical matters were raised.

URPS' response and recommendations arising from this feedback is summarised in Section 7 'Our Response and Recommendations'.

5.1 Written Submissions

In total, **12 stakeholders** provided feedback with **5 supportive**, and **7 supportive with request for future additional action/clarification**. The key points raised within the stakeholder submissions are outlined below, listed in alphabetical order.

5.1.1 Aboriginal Affairs and Reconciliation

Aboriginal Affairs and Reconciliation (AAR) confirmed the risk of discovering Aboriginal heritage during the development as low as stated in the Aboriginal Heritage Assessment and accepted the future Construction Environment Management Plans (CEMPs) prepared for the development as an appropriate way for managing unexpected discoveries of Aboriginal heritage during construction.

AAR recommends a demonstrated commitment to engaging with Aboriginal stakeholders ideally through the development of an Aboriginal Engagement Plan, or alternatively strategies, to ensure appropriate engagement and information sharing with relevant Aboriginal stakeholders during the design, delivery and operation of the development.

Overall, this stakeholder's submission is considered **supportive with request for future additional action**.

5.1.2 Department for Environment and Water

The Department for Environment and Water (DEW), including Green Adelaide, confirmed it was generally satisfied that the EIS had addressed the Assessment Requirements. DEW's submissions highlighted two aspects of the proposal where additional information was sought, namely:

Dredging – DEW sought additional information to better understand the impact of dredging on dolphins in the Adelaide Dolphin Sanctuary (ADS) during construction of the wharf, details of the mitigation measures to be applied and the potential cumulative impact of future dredging on the Port River marine environment.

Hazard risk management – DEW considers the EIS inconsistent in how it represents finished floor levels and sought clarification on the final site levels to better understand flood risk on the development and surrounding areas as well as details on how increased stormwater runoff will be managed and mitigated, including potential impacts on Mutton Cove. DEW is concerned that the EIS underestimates future flood risk due to the likelihood of sea level rises and more frequent

emergency wet weather events. It recommends the EIS consider sea level rise at 2100 as a minimum.

Overall, this stakeholder's submission is considered **supportive with request for further information**.

5.1.3 Department for Health and Wellbeing

The Department for Health and Wellbeing (DHW) welcomes the opportunity to review CEMPs once available with the objective of mitigating impacts on human health and working with the EPA on any public health risk communications relevant to the project.

DHW noted the low/negligible risk to public health from existing air quality modelling but noted the need to monitor NO₂ levels and TSP (nuisance dust). Additional comments were made regarding the potential for contaminants in waterbodies and fish caught for human consumption and the area being a highly mosquito prone environment.

Overall, this stakeholder submission is considered **supportive**.

5.1.4 Department for Infrastructure and Transport

The Department for Infrastructure and Transport (DIT) noted in its submission that the proposal is supported by a Traffic Impact Assessment (TIA) and that a new grade separated link road to the facility and access to Victoria road car parks have previously been approved/are being progressed.

DIT requested additional updates to the TIA including:

- Increased detail about access into the submarine construction yard and its traffic impacts (including traffic volumes and distributions along key roads)
- Details of the PM peak and daily volume impacts (only AM impacts have been provided).
- Assessment on how a "partially-constrained" wider road network is able to service the SCY precinct.
- Details of the plan to support the traffic generated by the development on the surrounding network, including master planning, shift management, traffic management plans for the individual phases of the development (e.g. construction, commissioning and full operation).
- Discussions about promotion of active travel modes like public transport, walking and cycling being supported by the provision of suitable end of trip facilities on site.

In addition, DIT sought clarification on the likely impacts on existing maritime activities and the management and mitigation measure for hazardous substance spills into adjacent waterways as well as specific land parcel details.

DIT also sought clarification on the locations where dredging works will be required to determine if the transfer of seabed land between the Minister for Infrastructure and ANI is required, and confirmation of storm water pipes and perimeter security arrangements.

Overall, this stakeholder submission is considered **supportive with request for further information**. Further meetings have been held with DIT to further progress traffic modelling to support the development.

5.1.5 Department of the Premier and Cabinet

The Department of the Premier and Cabinet (DPC) acknowledged the provision of feedback from other SA government agencies on the EIS. Additionally, DPC recognise that the EIS assessment process forms part of a broader suite of approvals required to design, construct and operate the SCY, including the Commonwealth's assessment of protected matters and additional nuclear licences and permits. It also acknowledges broader matters being considered via the Lefevre Peninsula Master Plan. Key themes within DPC's submission included road network capacity and flood risk as well as ensuring the highest standards of nuclear safety and security.

Overall, this stakeholder submission is considered **supportive**.

5.1.6 Department of Primary Industries and Regions

The Department of Primary Industries and Regions (PIRSA) raised concerns about the presence of or introduction of new marine and terrestrial pest species and the risk of transporting these pests from the site to other areas of the state via vessel traffic.

PIRSA requested that the EIS state their responsibility for the review and approval of Biosecurity Management Plans. Overall, this stakeholder submission is considered **supportive**.

5.1.7 Environment Protection Authority

The Environment Protection Authority (EPA) indicated it is generally satisfied with the EIS, however sought further information on the following topics:

- Coastal and Marine, in respect of the proposed dredging during construction of the wharf
- Nuclear Propulsion Systems
- Site and Groundwater Contamination, in respect of site contamination investigations.

In addition, the EPA highlighted minor concerns with the following:

- Air Quality, in respect that the assessment does not consider all applicable criteria
- Noise/Vibration, in respect to areas defined as quiet localities

Overall, this stakeholder submission is considered **supportive with additional information requested**. Further meetings have since been held with the EPA to provide additional information or clarification in response to their comments. The final correspondence was supportive with one minor remaining issue in relation to ground water contamination which will be dealt via a condition on the development approval.

5.1.8 Minister responsible for the Adelaide Dolphin Sanctuary

The Honourable Susan Close MP, Deputy Premier and Minister for Climate, Environment and Water provided a submission in her capacity as the Minister responsible for the ADS.

The Minister's submissions noted additional information was required to:

- better understand the impact and mitigation measures that would minimise risk to dolphins within the ADS associated with the proposed dredging during construction of the wharf at Area 3 (proposed dredging); and
- consider cumulative impacts associated with current and proposed dredging in the Port River (necessary future dredging).

In addition, the submission highlighted that the EIS should demonstrate how the proposed development will be consistent with the objectives of the ADS Act and Management Plan.

Overall, the submission is considered **supportive with additional information requested**.

5.1.9 City of Port Adelaide Enfield Council

The City of Port Adelaide Enfield Council (CoPAE) has adopted a Decision-Making Framework for AUKUS to guide its input and uses this framework to inform Council's EIS submission.

Council's overarching concern relates to the impacts of AUKUS on existing residents, including the potential to displace existing communities due to land value increases and the potential for social economic disadvantage if development impacts such as traffic volumes, noise and air quality, and health inequities are not appropriately addressed.

CoPAE also raised concerns about the reliance on desktop assessments and conceptual design, the degree of further assessment required and provision of future management plans as well as the reliance of the Lefevre Peninsula Masterplan to manage impacts on the wider peninsula.

CoPAE sought further information on:

- Timeframes for the scheduling of the development i.e. what is happening when and where for community awareness purposes.
- Confirmation of who the 'relevant authorities' are, as referenced throughout the EIS.
- Confirmation of what the various 'approvals', 'safeguards', 'licences' and 'permits' are, as referenced throughout the EIS.

Council's submission made 23 individual recommendations which are addressed in Section 7.

Overall, this stakeholder 's submission is considered **supportive with additional information requested**.

5.1.10 South Australian Metropolitan Fire Service

The South Australian Metropolitan Fire Service (SAMFS) provided a submission in relation to section 1.15 Dangerous Substances, advising that input into the design of dangerous goods and hazardous chemical storage should involve the SAMFS Built Environs Department and that local SAMFS crews and hazmat staff conduct regular exercises. In addition, the SAMFS Guideline for Emergency Services Information Package should be referenced in section 4.2.3B of the EIS and the MFS should be involved in reviewing emergency plans.

Overall, this stakeholder submission is considered **supportive**.

5.1.11 South Australian Police

The South Australian Police (SAPOL) provide comments relating to the Department of Defence Operations Manual (OPSMAN 1) requirements for Nuclear-Powered Warship visits and the need for ongoing radiation air quality monitoring whilst in port. SAPOL sought to have similar monitoring requirements included in the EIS.

SAPOL also raised concerns with the transportation of dangerous goods on the SA Road network and alternative route approaches from the southern suburbs should a vehicle accident occur.

Overall, this stakeholder submission is considered **supportive**.

5.1.12 Native Vegetation Council

The Native Vegetation Council's (NVC) submission noted that:

- NVC approves a Significant Environmental Benefit (SEB) under Regulation 13—Clearance for major developments and projects.
- The *Native Vegetation Act 1991* does not apply to terrestrial native vegetation within the proposed development area, however, it applies to marine native vegetation within Area 3.
- The Native Vegetation Clearance Data Report for clearance of native vegetation will be prepared once the final design of the development and the quantity of seagrass or other native vegetation impacted by the development has been confirmed.

Without the Native Vegetation Clearance Data Report Council raised concern that information in the EIS was inadequate to comment fully on the potential impact on native vegetation but provided the following points:

- The impacted area, especially areas of seagrass, samphire and mangrove, has high biodiversity values. The project will need to demonstrate what measures it took to firstly avoid, then minimise the impact on native vegetation, before offering to rehabilitate/restore ecosystems, and offset the clearance.
- Data Report, prepared by an accredited consultant, must describe any potential cumulative impact, both direct and indirect, that is reasonably likely to result from a proposed clearance activity.
- Council requested further information on:
 - the impact of increased turbidity on light diffusion, prospectively reducing aquatic plant photosynthesis and disrupting the health of underwater ecosystems
 - the risk of algal blooms due to increased nutrient loading, which could degrade water quality and compromise marine life
 - the direct loss of sea meadows from dredging, affecting local biodiversity and disrupting marine habitats

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- the potential for seagrass degradation, negatively affecting fish nurseries and aquatic food chains with flow on effects for species that rely on these habitats such as the local dolphin population within the ADS.
- Council is required to ensure that the clearance of vegetation will not cause significant harm to the ADS and will seek comments from the Minister administering the *Adelaide Dolphin Sanctuary Act 2005* once the Native Vegetation Clearance Data Report is received.

Overall, this stakeholder submission is considered **supportive with request for further information**.

6. Community Feedback

The EIS consultation was communicated publicly via direct notification, print advertising, and online promotion. The consultation offered multiple ways for the community to provide their feedback including via written submission, PlanSA form, YourSAy survey, email, post, or at face-to-face drop-in sessions.

The community were advised of the commencement of the EIS consultation in the following ways:

- **2,300 community members were directly notified** via a letterbox drop of the factsheet to residential addresses on the Lefevre Peninsula on 3 February 2025.
- A quarter page advertisement/public notice was published in **The Advertiser newspaper** on Monday 3 March 2025 providing details on how to provide feedback and the dates of the community information sessions. The Advertiser's mid-week print **circulation is 229,000**.
- The State Government's YourSAy platform included advice of the EIS engagement in its **YourSAy newsletter** distributed electronically to **over 36,000 subscribers** on 13 February 2025 with the **newsletter opened over 14,000 times**.

A copy of the direct mail letter, public notice and YourSAy newsletter is contained in **Appendix A**.

6.1 Written Submissions and PlanSA Forms

A total of 22 written responses were received from businesses, community groups and individuals during the engagement period. Of these 18 were email submissions and four were submitted via the online PlanSA form.

Of the 22 community submissions, two were supportive, two were supportive with changes, 16 did not support the proposal and two were neutral.

Several respondents provided feedback by more than one method. Where duplicate submissions from the same person were identified, only one submission was counted.

6.1.1 Businesses/Non-Government agencies

Two local businesses/non-government agencies provided written submissions which are summarised below:

Electranet

Electranet's submission highlighted the extensive electricity transmission infrastructure located on Lefevre Peninsula, including within the subject land for the proposed SCY development.

ANI has been actively engaging with ElectraNet regarding the potential relocation of existing utility services to enable the development to proceed. The relocation of utility services is excluded from this EIS and, where required, will be the subject of a separate development application.

Overall, this stakeholder submission is considered **supportive**.

Flinders Port Holdings

Flinders Port Holdings (FPH) are the owners and operators of the Flinders Adelaide Container Terminal in the Port of Adelaide and several regional ports in SA. FPH generates \$4.5b in economic contribution and 24,000 jobs in the State.

FPH supports many of the outcomes outlined in the EIS and is keen to ensure that during development and operation of the SCY, trade can continue to move throughout the State.

FPH's submission provided comments about the following aspects of the EIS:

- SCY dredging activities – recommends synergies be found with other dredging requirements in the inner and outer harbor to minimise impact and work with existing parties who are familiar with the river ecosystem to ensure best outcomes pre and post dredging activities.
- Transport Management – states that it is critical the Lefevre Peninsula Master Plan includes adequate alternative freight routes on and off the Peninsula.
- Critical Services – outlines the urgent need for stormwater and electrical services to ensure the development can proceed in a timely fashion.
- Air Quality – stresses the importance of managing emission and particulate matter with mitigation measures outlined in the project's CEMP and Operational Environmental Management Plan ('OEMP').
- Water Transport – security and access to key facilities is critical to ensure trade through the state's only container terminal is not interrupted.
- Noise and Vibration – importance of assessing and monitoring noise and vibration impacts during construction and operation.
- Biosecurity – ensure all water activities consider disease mobilisation as well as management strategies on land for first ports of call.
- Flora & Fauna – acknowledges that some impacts to seagrass is unavoidable due to dredging and operation. FPH seeks to work with ANI for long-term restoration of flora such as sea grasses, saltmarsh and mangrove habitat and explore opportunities for fauna monitoring.
- Climate Change – essential that the development is consistent with current practices for climate change and sea level rise and considers alternative solutions to land-based dredge management.

Overall, this stakeholder submission is considered **supportive**.

6.1.2 Community Group Submissions

Seven community groups/member organisations provided written submissions which are summarised below.

Some community groups chose to provide their feedback via the online survey, including the Independent and Peaceful Australia Network SA, Western Adelaide Coastal Residents Association and OzFish Unlimited.

These are included in Section 6.2 below.

Australian Conservation Foundation

The Australian Conservation Foundation (ACF) submission raised broad concerns with radioactive waste management; First Nation and wider community consultation; and nuclear security, safety and non-proliferation considerations. In particular, the submission addressed three aspects in detail:

- Inadequate emergency planning and response analysis.
- Poor representation of the impacts of radiation exposure.
- Inadequate radioactive waste detail and management strategy.

ACF specifically called for:

- The adequate provision of detail around potential radiation and accident/emergency risks and scenarios.
- The full application of ARPANSA's *Guide for Radiation Protection in Emergency Exposure Situations* and *Nuclear-Powered Vessel Visit Planning* guidance documents at Osborne.
- The withdrawal of the assertion that there is 'no evidence of human health effects' from exposures of up to 10 mSv which is not consistent with detailed evidence and good practise.
- Provision of detail about the nature of radioactive materials at the Osborne Yard, and consideration of urgent protective action zones and a local evacuation plan.
- Rejection of the rationale that as Osborne is 'a defence high security precinct, not all information is publicly available'.
- Advice that the repeated use of 'out of scope' and deferred assessments undermines the EIS assessment.
- An open approach to future AUKUS HLW management in Australia informed by consideration of domestic ILW management.
- All AUKUS related legislation and approvals processes must explicitly recognise and reflect the foundational management principle of free, prior and informed consent (FPIC).

Overall, this community group submission is considered **not supportive**.

Friends of the Earth, Adelaide

The submission from Friends of the Earth Adelaide stated the EIS is "seriously deficient" in that it fails to properly address the risks associated with radioactive waste and the potential for nuclear accidents as well as the economic risk of the project failing. It advocated for the project to be "abandoned" as it is not in Australia's security interests and will make Australia "less secure".

The Friends of the Earth, Adelaide submission specifically called for:

- The removal of explicit and implicit expressions of support about the strategic benefits of nuclear-powered submarines for Australia.
- An assessment of the risk of failure of the nuclear submarine construction project and the economic and employment impacts of such a failure.
- An analysis of the risks and consequences of incidents and accidents that could lead to a release of radioactive material into the environment, published as part of the EIS process.
- For the public to be informed about the potential for exposure to radiation and the levels of radiation they could be exposed to.
- The development of a response plan for radiological emergencies by the state government in consultation with other state agencies, emergency services and the public.
- The publication of plans for the management, storage and disposal of radioactive waste, including its plans for intermediate and high-level waste and spent nuclear fuel.

Overall, this community group submission is considered **not supportive**.

Friends of the Earth, Australia

The Australian chapter of the Friends of the Earth stated that the EIS failed to recognise the effects and impact of a potential nuclear accident and lacked evacuation planning. It raised concern that nuclear safety studies had not been made public placing Defence security interest over public health and safety. The submission stated that federal and state labour governments had failed in their responsibility to be transparent and accountable on public safety. The submission also called for greater recognition of the rights of Indigenous People in having hazardous material stored or disposed on their land.

Note: Some aspects of the submission related to the ASA consultation on the strategic assessment and are not considered further within this report.

Overall, this community group submission is considered **not supportive**.

Friends of the Port River

The Friends of the Port River (FPR) submission suggested that the EIS understates the importance of the local environment and the risks to Mutton Cove and the ADS.

The Friends of the Port River submission included comments on its shared support with the City of Port Adelaide Enfield's submission and concerns for:

- Relying on the Lefevre Masterplan process to manage wider impacts on the peninsula.
- Discounting climate change and flooding risks in Table 4.9 (page 80).
- Not delaying planning which is needed now for transport and traffic management.
- Needing to give more consideration to Mutton Cove and the development interface.

Of primary concern is the potential deterioration or collapse of the seawall at Mutton Cove. The submission called for a range of measures to ensure its protection.

Overall, this stakeholder submission is considered **neutral**.

Medical Association for Prevention of War (MAPW)

MAPW is an association of health professionals concerned with the elimination of nuclear weapons, and reduction in armed conflict, nuclear power and radioactive waste. The MAPW submission called for:

- The EIS to be rejected due to the possibility of a nuclear accident.
- International best practice in nuclear safety to be applied to the project.
- Regulation of the project to be independent of the Minister implementing it and transparent reporting.
- Release of nuclear safety records by the UK Ministry of Defence to the SA government and Australian public.
- Public consultation on and selection of a site for the disposal of naval LLW.
- Commitment by SA and federal governments to the UN Declaration on the Rights of Indigenous Peoples.
- Removal of the false claim the LLW from naval reactors is the same as nuclear waste from hospitals in all current and future project communications.

Overall, this stakeholder submission is considered **not supportive**.

Port Adelaide Resident's Environment Protection Group (PAREPG)

PAREPG's submission raised concerns that residents will face increased traffic congestion, decreased housing and health options, and reduced access to environmental space with very few compensable benefits.

Rising rents and the potential for homelessness if people are forced out of the area due to increased demand of housing in the locality was highlighted as a major concern. In addition, the submission highlighted growing community concern about the project as evident by the formation of the Port Adelaide Community Opposing AUKUS (PACOA) with the lack of transparency on the nuclear issues was considered the dominant issue within the community.

PAREPG made the following recommendations:

- Further investigations to identify the scale of households at risk and actions to address housing security.
- In the interests of transparency, the EIS should recognise the risk involved in the test and commissioning procedure.

- That the basis (if any) of excluding the assessment of radioactive waste from the EIS be defined prominently within the EIS.
- That the EIS not be approved until a suitable repository is capable of receiving the project's low-level waste.

Overall, this stakeholder submission is considered **not supportive**.

Port of Adelaide National Trust Tree Group

The Port of Adelaide National Trust Tree Group submission sought for greater priority to be given to green infrastructure through:

- The establishment of a connected green corridor along Victoria Road.
- Use sustainable development principles that promotes increase tree canopy, water sensitive design and protection of biodiversity.

The submission identified that Victoria Road has capacity for trees either side of the road and on the wide medium strip with large sections of the road currently bereft of trees. The submission proposed that the community should be compensated for increases in traffic with enhanced green spaces. The submission highlighted that DIT's Lefevre Peninsula Upgrade Project did contain an adequate environmental response noting that City of Port Adelaide Enfield has the lowest green canopy (8.08%) in the second lowest city canopy cover, Adelaide (16.7%) in Australia.

Overall, the Group called for enhanced tree canopy, understorey vegetation and biodiversity along Victoria Road corridor to provide a more liveable green environment for the community considering the SCY development. Overall, this stakeholder's submission is considered **supportive with concerns**.

6.1.3 Individual Community Member Submissions

Nine individuals provided written submission, and four individuals provided a PlanSA form. The following issues were raised:

Air quality

Community submissions disagreed with the EIS statement that there would be no significant impact on air quality highlighting that Victoria Road already has high levels of PM_{2.5}³ and PM₁₀, and that the increased rate of vehicular traffic as well as manufacturing activities at the Osborne site would decrease air quality further in the vicinity.

Biosecurity

Some submissions expressed concern at the potential for ship-building activities to aid the redistribution of exotic species that currently live in the Port River to other locations, suggesting that

³ The submission referenced PM₃; however, it is presumed that the intended reference was to PM_{2.5}.

the EIS needed to be expanded to include this concern in addition to the risk of introducing or importing new exotic species.

Community well-being

Community submissions did not agree with the EIS claim that there would be no significant effects on community well-being. This was primarily due to the potential for an unplanned incident or nuclear material leakage as well as potential health consequences from poorer air quality.

Contamination

Community submissions raised concern that construction activities such as dredging could introduce contaminants such as heavy metals, hydrocarbons, plastics, excess sediment and other pollutants. Other submissions were concerned about contaminants entering the marine environment resulting in water turbidity, seagrass impacts, bioaccumulation of toxins in the Port River dolphin population and other local fish/shellfish posing a risk to human health if consumed.

Some submissions called for independent monitoring and stringent control measures including spill response protocols and sediment containment strategies. Others called for remediation strategies and financial offsets/investment.

Some community submissions opposed the proposal due to environment impacts, whilst other called for a balanced approach that prioritised protection and restoration.

First Nations Engagement/Rights

Several community submissions called for more engagement with First Nations people about the proposal and protection of Aboriginal heritage on the SCY site.

Some submissions highlighted that indigenous people have a UN recognised human right to say no to nuclear waste citing the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, adopted by UNGA, Sept 2007) in Indigenous People's Article 29 Rights to "Free, Prior and Informed Consent" over storage or disposal of hazardous materials on their lands.

Flooding/Climate Change

Some community submissions highlighted concerns around future sea level rises due to climate change and potential impact on Osborne and the surrounding areas. One community member supplied a copy of the State Emergency's Flood Hazard Risk Reduction Plan 2024 advising the Osborne development would not meet expected sea level rise predictions and therefore could not be considered a 'compliant development'. This community member also requested that LiDAR mapping be used to illustrate the potential for flooding at future public consultation events.

Marine Flora and Fauna

Some community submissions opposed the proposal due to impacts on aquatic habitats. There were concerns around the SCY being located within the Port River estuarine system that supports "one of the most extensive and stable 'Zostera spp. Seagrass meadows'" and "potentially the sole intertidal razor clam" as well as mangrove forests.

Community members were concerned that seagrass meadow degradation would negatively impact fish habitat and the populations of over 25 fish species including bream, whiting, salmon, prawns, blue swimmer crabs, rays, tommyes, squid and snapper. There was concern the development would negatively impact recreational fishing. One submission called for clear mitigation strategies including real-time monitoring of fish populations. Another suggested minimising habitat loss by undertaking dredging operations during the cooler winter months.

Other submissions were concerned about the impact on marine fauna, in particular the Port River's Indo-Pacific Bottlenose dolphin and Australian sealions. One submission raised concerns about the potential for tritium to leak into the water resulting in potential beta radiation of the mammals.

National Security

Some community members indicated they were concerned that the SCY and the Lefevre Peninsula could become a military target if Australia went to war.

Noise

Community members were concerned that industrial noise would increase with the SCY development, noting that in some areas it is considered a problem on the Peninsula where industry operates in proximity to sensitive receivers.

Nuclear Waste/Material

Many community submissions raised concerns about the safety of nuclear waste/material and the potential environment, health and social impacts of radioactive contamination. Some submissions raised specific concerns about the nuclear power modules including transport and delivery, storage, commissioning, testing and safety systems, in addition to radioactive waste production, storage and transportation. Others called for no nuclear waste or nuclear-powered submarines to be allowed in Australia.

Many community submissions expressed frustration with the lack of information and avoidance of discussion of the nuclear aspects of the proposed development in the EIS. Community members felt the EIS should fully address this matter and were not reassured by statements that it would be addressed through other documents and consultation opportunities. Some felt the EIS finding that 'no' possibility of nuclear exposure for residents or the environment was untrue or wrong, and that the potential for risk, even if slight, should be acknowledged and planned for.

The omission of the word 'accident' in the EIS report was considered to be a deliberate attempt to avoid acknowledging the nuclear issue. Community members called for an acknowledgement of risk and demonstration of appropriate planning and mitigation measures should exposure to nuclear waste occur.

One submission suggested the creation of a 'Nuclear Hazard Overlay' in the Planning and Design Code be considered if the EIS was approved by the Minister.

Radiation Exposure

The potential for exposure to radiation was one of the biggest concerns for members of the community. Many submissions disagreed with the EIS assessment that radioactive waste stored at

Osborne would be “similar to hospital waste” and felt this statement was misleading the public about the known health effects of radiation exposure.

The proposed temporary storage of radioactive waste at the SCY and transportation off-site to a yet-to-be-determined facility was considered to pose unacceptable risks to the community. It was felt that the EIS contained inadequate information about how radioactive material would be stored onsite and transported through highly populated suburban areas. Other submissions cited concerns regarding the health and safety of workers, and the possible potential for personal injury claims due to radioactive exposure.

Questions were raised about the availability and distribution of iodine prophylaxis as a protective health measure for the community in the event of a radioactive release. Some community member submissions referenced a research paper by Susanna Cottagiri entitled “*The risk of thyroid cancer in relation to residential proximity to nuclear power plants: a systematic review and meta-analysis*” published on 24 November 2024 with calls for a long-term study to be undertaken on the potential effects of cancer in relation to residential proximity on the peninsula.

Risk Levels, Emergency Response and Contingency Plans

Community submissions included concerns around insufficient risk assessment levels and associated mitigation measures in particular the risk of noise as well as vegetation clearing and the implications for local fauna and bird populations.

Some submissions suggested the EIS failed to inform the public of ‘catastrophic risks’ or ‘high consequence’ events, highlighting the lack of emergency and contingency plans including an evacuation zone plan for the Lefevre Peninsula residents should it prove necessary. It was felt that the rapid evacuation of residents would be problematic, and that comprehensive contingency planning had not been considered.

Project Costs

Some submissions raised concerns about the financial cost of the project, with one describing it as “financially wasteful”. Others proposed redirecting the AUKUS budget would have a “profound impact on Australians’ health, housing, education, international relations and alleviating social disadvantage.” Several submissions called for the project to be abandoned regardless of the financial investment in the project to date.

Public Transparency

Some submissions voiced concern that there had been insufficient public consultation on a national level around the AUKUS program and that the Australian population had not been given adequate opportunity to debate the issue by current federal and state governments which was an “affront to the basic precepts of democracy”.

Other submissions felt that the EIS process had little public visibility or accountability, relying on future management plans, licences and approval. Some called for ongoing consultation with local knowledge experts, conservation groups and the public as well as the release of monitoring data to ensure transparency and accountability. Other submissions wanted the Federal Government to

disclose specific information about the project's nuclear waste management and release "quality and clear information on the risks of nuclear accidents."

Traffic

Submissions suggested that there is already considerable traffic on Victoria Road coinciding with the end of shift for the current workforce at defence facilities at Osborne. Speeding on Victoria Road was also mentioned as being problematic. Submissions suggested doubling Victoria Road in size, reducing the speed limit as well as additional road infrastructure (such as overpasses).

Visual Amenity

One community submission disagreed with the EIS finding that the SCY will not result in a significant detriment to the visual amenity of the peninsula. The submission noted that coastal sections on the eastern side of the peninsula are now closed and large swathes of vegetation immediately to the east of Biodiversity Park had been razed.

6.2 Online Survey

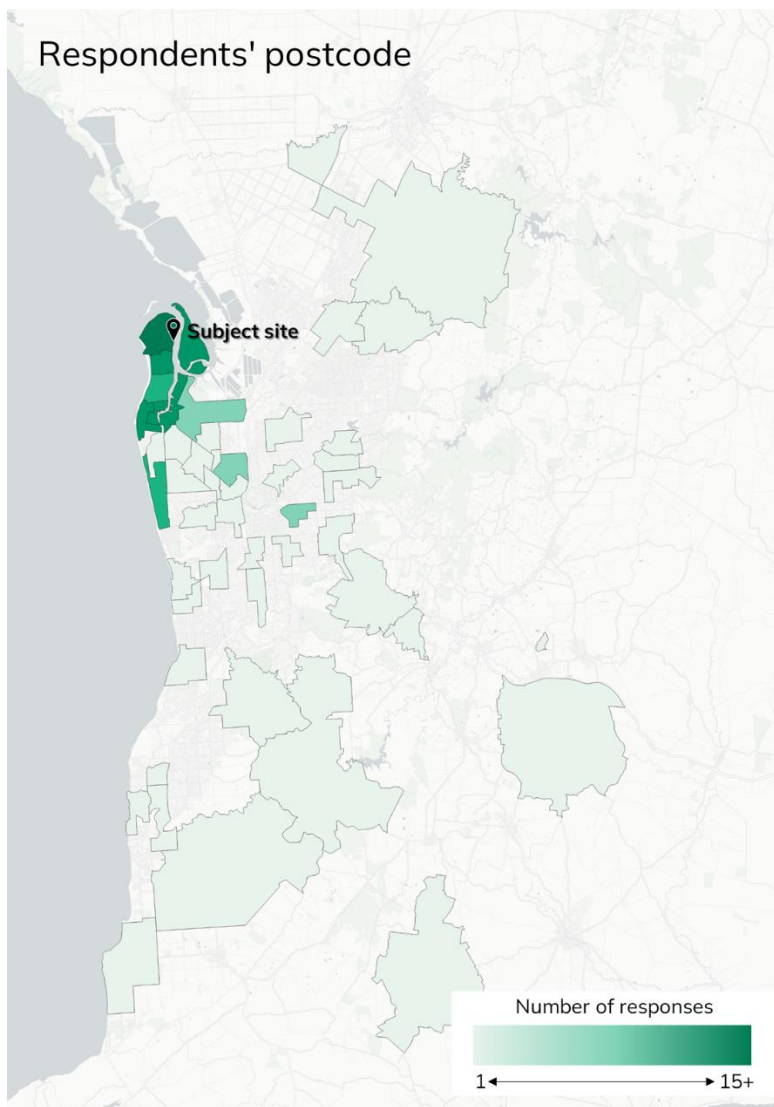
The online YourSAy survey proved the most popular way for community members to provide their feedback. In total, 158 responses were received via the online survey with the key results summarised in this section. A copy of the online survey form is contained in **Appendix C**.

6.2.1 Who we heard from

Overall, responses were received across a broad area of the Greater Adelaide region as shown in Figure 4 below. The highest number of respondents who provided postcode information were from North Haven and Outer Harbor (postcode 5018), at 12%. Together, the suburbs along the Lefevre Peninsula accounted for over 38% of respondent locations (postcodes 5018, 5017, 5015, 5019).

There were responses from regional areas (not pictured in Figure 4), including McLaren Vale (5203), Kapunda (5373), Port Lincoln (5606), and Quorn (5433). There were also three responses from interstate, including two from Victoria and one from New South Wales.

Figure 4: Online Survey – Respondents postcode



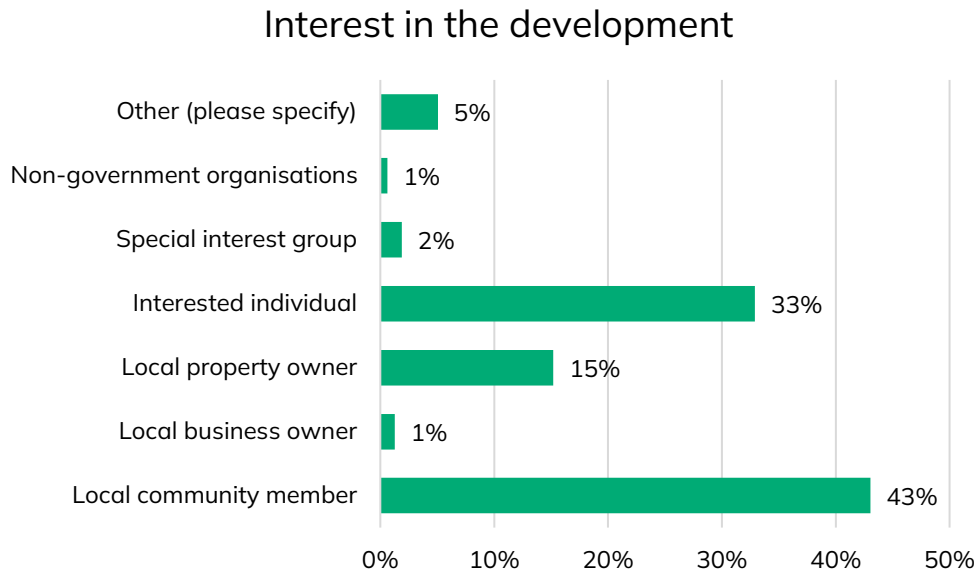
6.2.2 Interest in the development

Respondents were asked to select their interest in the development. Over half of all respondents were local community members (43%) or local property owners (15%), with interested individuals accounting for 33%. Special interest groups, non-government organisations and local business owners, together accounted for just 4% of responses.

Those who specified 'other' had interest in the development such as being residents of the wider area, South Australian citizens and people with family in the area. There were also responses from people who specified affiliations with groups such as peace groups and the Australian Defence Force.

No survey respondents selected the option to describe their interest in the development as 'Represent a company or organisation affected by the proposal', 'Member of Parliament', 'Local government', or 'State agency'.

Figure 5: Online Survey - Interest in the development

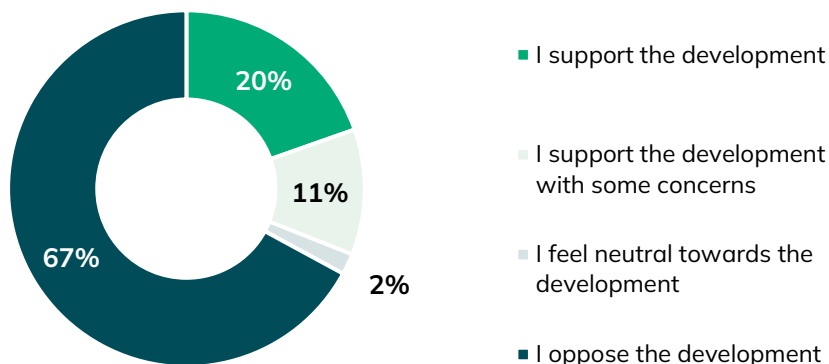


6.2.3 Level of support for the development

When asked ‘do you support the proposed development?’ a majority of respondents (67%) were opposed, while an additional 2% felt neutral towards the development. Overall, 31% of respondents support the development (20%) or support the development with some concerns (11%), as demonstrated in Figure 6 below.

Figure 6: Online Survey - Do you support the proposed development?

Do you support the proposed development?

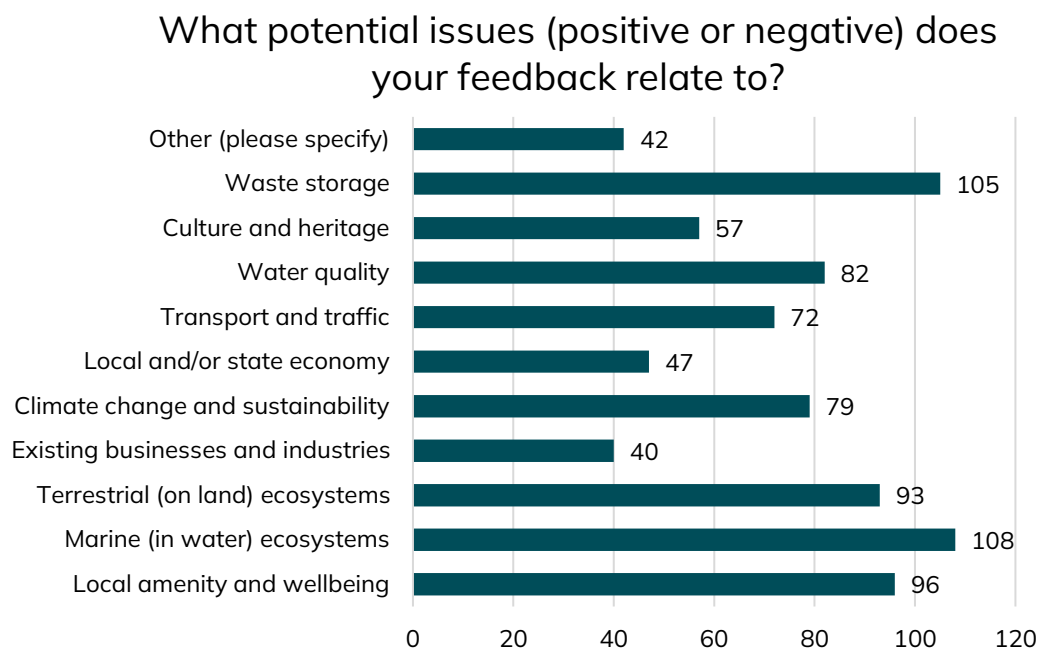


6.2.4 What potential issues (positive or negative) does your feedback relate to?

Respondents were asked to select the potential issues (positive or negative) that their feedback relates to by choosing from multiple options as displayed below in Figure 7.

Overall, Marine (in water) Ecosystems and Waste Storage were the most selected issues with 68% and 66% respectively. Local Amenity and Wellbeing and Terrestrial (on land) Ecosystems were also highly selected issues. Business and Economy related issues were the least selected, with Local and/or State Economy selected by 30% of respondents and Existing Business and Industries selected by just 25%.

Figure 7: Online Survey - What potential issues (positive or negative) does your feedback relate to?



27% of respondents selected 'other' and nominated the following potential issues:

- National security, foreign policy and global politics.
- Waste storage, safety and emergency management.
- Ethics and cost to government.
- Limited access to information about the project.
- Property value.
- Quality of life, health and wellbeing, impact to residential population.
- Transport infrastructure.
- Local jobs for residents.
- End of asset life considerations.

6.2.5 Feedback on interaction with businesses and people living and working nearby

Respondents were asked to provide feedback on how the proposal may interact with nearby businesses and/or those who live and work on the Lefevre Peninsula. Overall 114 people (or 72%) provided feedback on this topic, while 44 people provided no response or stated that they had no feedback.

Of the feedback provided, six responses reiterated support for the development. 37 responses were predominantly relating to the decision for the use of nuclear power (which is outside of the scope of this engagement and EIS). Overall, these responses raised issues and concerns regarding:

- National security, foreign policy and global politics.
- Waste storage, safety and emergency management.
- Ethics and cost to government.
- Limited access to information about the project.

Environment and wellbeing

Aside from concerns about the use of the Propulsion Systems, the most common theme in the responses to this question related to environmental and wellbeing issues, with 31 responses addressing this topic.

The built environment, and location of the development in proximity to established residential areas was the most frequently raised concern. Some respondents noted that a more remote location would be preferred, with risks and flow-on impacts to the desirability of the area to live, work and do business.

Comments included:

- *"It is surrounded by waters, camping grounds, and is near a beautiful historically important town (Port Adelaide) setting"*
- *"It will have a negative impact on the environment. I would move as I don't want to live near nuclear anything."*
- *"Build it where it is more remote, with less impact on infrastructure, people and nature"*
- *"Very concerned about the dangerous toxics in the environment so close to animals and humans"*

Several concerns were raised regarding the impacts to the natural environment and ecosystems, and the flow-on impacts this has to people living on the peninsula and other businesses and industries. Respondents were particularly concerned with impacts to significant ecosystems such as the ADS, International Bird Sanctuary and mangrove environments at Mutton Cove. The use of water and uncertainty around climate change and sea level rise were also noted as key issues.

Comments included:

- *"The Peninsula is an undervalued ecosystem....What about tourism of coastline, wildlife e.g. dolphins and birds, and water activities?"*
- *"It also is likely to be affected by climate change issues as it will need water to run. Water is scarce. This is also an area likely to be impacted by sea level rise."*
- *"The new site takes up a huge area and stops people having any access to Mutton Cove, a fabulous river and mangrove area."*

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Human health and safety was raised as a key concern, particularly regarding the impact of transporting and storage of radioactive waste. The potential for spillages, leakages and more serious incidents were also raised in the context of human health and safety. Some respondents felt that the proposed development puts economy over community safety.

Comments included:

- *"The health and well being of everyone living on the Lefevre Peninsula could be affected, especially if nuclear waste is stored at the site."*
- *"there is a risk from the waste storage for radiation spillage in soil and water, and more importantly dust blowing over the areas my grandson would be playing."*

Other comments relating to this theme included the lack of consultation with Kaurna elders and the effects on sites of cultural significance to First Nation people, and concern that the development unfairly impacts already marginalised people, with a higher than average representation from low socioeconomic backgrounds on the Lefevre Peninsula.

Infrastructure

Infrastructure was a common theme raised in the feedback provided by respondents, with 22 responses relating to this topic.

Traffic impacts were frequently raised, particularly in the context of increased heavy vehicle traffic (including during construction) and pressure on road-based infrastructure from increased activity at the site. These issues were raised in terms of both impact to travel times, but also amenity impacts such as increased noise and air pollution, and reduced safety and liveability, particularly for children and the elderly. Key locations of concern include Victoria Road, Osborne Road and Pelican Point Road. Comments included:

- *"I live very close to the Sub Corp. The increase in trucks is scary. I have mobility issues crossing Victoria Road is unsafe at times. I live in the housing trust units a lot of older less mobile people live here. What is going to happen to them."*
- *"The area will need road and rail upgrades particularly on Victoria road. There are little safe crossing zones and sometimes congestion at the Shipyard clock on and clock off times annoys the locals."*

A number of respondents discussed the increased demand for social infrastructure.

Some noted that the development may be a catalyst for increased investment in social infrastructure on the peninsula, while others were uncertain whether existing provision and level of service would be sufficient to accommodate increased demand. Comments included:

- *"... It is imperative that the living standards and amenities for the people in the area are maintained or improved. Schools, shops, leisure and sports facilities need to be catered for."*
- *"I believe that the North Haven shopping centre will become even busier than it is now. That being great for the shops but very tricky for locals .."*

Economic impacts

Economic impact was a common theme raised in the feedback provided by survey respondents, with 18 responses relating to this topic.

The potential positive impacts to local businesses and employment were raised by several respondents. Comments included:

- *"I am hoping it makes a hub for existing businesses to provide services directly or indirectly."*
- *"It can create jobs and those workers will likely use local cafes, shops and other amenities."*
- *"It will have a major effect on employment in the Port area and the future development of Port Adelaide."*

The economic impacts that may flow-on from changes to the area's liveability, desirability and amenity were also raised by respondents including concerns regarding impacts to property values, and existing businesses and industries.

Comments included:

- *"...lack of attractive environment for living, running a business and attending school and community recreation."*
- *"Hospitality and tourism will be devastated. No one in their right mind will want to be anywhere near it in case there is an accident - and an accident will also poison our waterways, soil and the environment. Lifestyles will be decimated as no one (who cares about more than money) will want to live, work or play in the area."*

6.2.6 Feedback on interaction with water and land-based environments

Respondents were asked to provide feedback on how the proposal may interact with water and/or land-based environments, such as impacts to plants, animals or important habitats. Overall, 125 people (or 79%) provided feedback on this topic, while 27 people provided no response and 6 people stated that they had no feedback.

Of the feedback provided, 12 responses reiterated support for the development, expressing that the environmental impacts seemed negligible, and that environmental management and standards will be sufficient to mitigate any potential issues. Six responses were predominantly relating to the decision for the use of nuclear power (which is outside of the scope of this engagement and EIS). Overall, these responses raised issues and concerns regarding:

- National security, foreign policy and global politics.
- Ethics and cost to government.

Negative environmental impacts

The most common theme from the feedback provided to this question was related to negative environmental impacts, with 38 responses. These responses ranged from those that expressed belief that there will be negative impacts, to those that detailed an array of specific negative impacts to both terrestrial and marine ecosystems such as radiation exposure, habitat disruption, and long-term impacts.

Respondents were particularly concerned with impacts to significant ecosystems such as the ADS, International Bird Sanctuary and mangrove environment including Mutton Cove. Some responses suggested that the development has not been adequately assessed for cumulative environmental impacts.

Comments included:

- *“An environmental disaster. Stop it now. Too much of our fragile environmental and wildlife is already struggling. It break my heart that future generations will never see the beautiful Australia I came to know. Environmental vandalism is totally unacceptable.”*
- *“Industrial works, land reclamation and increase in HV traffic will threaten migratory birds, dolphins, native plant species and possibly release toxins into the Port River and waterways.”*
- *“The proposal and its impacts are inappropriate for the site and established wildlife ecosystems surrounding.”*
- *“Climate change resilience of the region may be undermined, as the destruction of wetlands removes natural carbon sinks that help mitigate emissions.”*

Risk of contamination

The risk of contamination and/or accidents was a key theme, receiving 25 responses. These responses raised a number of concerns regarding the potential for leaks, spills and the risks of storing radioactive waste. Respondents noted the probability of human error, referencing historical and international incidents. Some respondents did not agree that radioactive waste could be 'low-level' as described in the EIS.

Comments included:

- *“Any escape of radioactive or other toxins such as mollusc-repellants and fuel oils could be damaging”*
- *“Any leakage would be devastating to the environment for centuries to come.”*
- *“Again I am concerned about nuclear accidents and the impact on the people and environment”*
- *“Leakage of radiation from an accident on site is likely to have devastating impacts on the natural water and land based environments, leading to contamination of water, air and soil. Remediation would be near impossible, leading to a significant longer term habitat damage and the instigation of an exclusion zone for human safety.”*

Impact to Marine Ecosystems

The impact to marine ecosystems was a key topic, with 25 responses. In addition to concerns raised specifically regarding impacts to the Port River, ADS and Mutton Cove Reserve, concerns also extended to the use of water required in operations, and interface with rising sea levels.

Comments included:

- *“I am very concerned about the scope of construction and later activity in relation to the Port River system & dolphin Sanctuary.”*

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- *“Large-scale industrial activity may alter coastal water flow, sediment deposition, and increase erosion along the Port River shoreline. Changes in tidal movement could also impact seagrass meadows, crucial for marine biodiversity. Alternative locations, preferably far away from my family, but with less risk, would be more appropriate.”*
- *“Nuclear submarines require large amounts of water for cooling, increase on the already raising sea temperature will have an adverse effect on the marine environment. It’s a sanctuary for dolphins it needs to be protected at all costs, not a nuclear waste facility.”*
- *“I have significant concerns about the potential negative environmental impacts of the proposed nuclear-powered submarine construction yard near the Port River, particularly given its proximity to protected areas like Mutton Cove Reserve and the Adelaide Dolphin Sanctuary.”*

Reduced public access

Reduced public access to the river and key environmental locations was raised as a concern, receiving [13 responses](#). This was particularly relevant for the Mutton Cove Conservation Reserve.

Comments included:

- *“The project will restrict public access to key conservation areas, reducing community interaction with natural spaces and coastal environments.”*
- *“Why have nuclear subs in a special urban environment with a well-known pod of resident dolphins that are important to the community, their cultural and natural heritage values, their recreation and tourism.... A lot of work has gone into making the habitat safe so that the dolphins are safe. It is a travesty to undermine and endanger all of this work.”*

Existing Industry

[Six responses](#) referenced the current poor state of the environment because of existing industrial land uses. Respondents raised concerns about the potential for additional contamination further polluting the environment and suggested that environmental monitoring should be conducted.

Comments included:

- *“The Port River is already contaminated with industrial toxins. This project will see radioactive substances added to the list of contaminants.”*
- *“Should be monitored more frequently than today”*

6.2.7 Feedback on affects to social and community infrastructure

Respondents were asked to provide feedback on how the proposal may affect existing service levels or social and community infrastructure.

Overall, [114 people](#) (or 72%) provided feedback on this topic, while 40 people provided no response and four people stated that they had no feedback.

Of the feedback provided, seven responses reiterated support for the development, noting that existing businesses will benefit from further investment in the area. Eight responses related to the decision for the use of nuclear power (which is outside of the scope of this engagement).

Overall, these responses raised issues and concerns regarding:

- National security, foreign policy and global politics.
- Ethics and cost to government.

Transport Infrastructure

Transport infrastructure was the most common theme raised by respondents, with 54 responses.

Road infrastructure was the most prominent issue within this theme, with respondents raising concerns about increased traffic, particularly heavy vehicles. Some respondents note that existing road infrastructure is already at capacity and will not be able to withstand additional demand without a range of upgrades. This was particularly an issue for Victoria Road. Responses also identified the potential for safety issues for other road users.

Comments included:

- *“A lot of older people live in the area with the increase of trucks on Victoria Road will be so dangerous to people in the area. Crossing to the road to get to the bus stop is getting harder with the increase of trucks with the Sub Corp expansion. You want to add more. Outrageous. Someone is going to get killed by a truck.”*
- *“Heavy vehicles servicing the base will result in increased wear and tear on roads and constant high noise levels.”*

A number of suggestions for improvements to transport infrastructure were made, including traffic lights at key intersections, and new road connections to the peninsula. A route between the northern expressway and Victoria Road was a common suggestion.

Comments included:

- *“During and post construction, traffic along Victoria Road will increase immensely. Have alternate access routes to LeFevre Peninsula been considered? new access bridge heading east to connect to Northern Connector?”*
- *“Victoria Rd is extremely busy as it is. Alternative traffic solutions do need to be explored such as an additional bridge over to St Kilda area for example to aid in moving traffic from the northern suburbs”*

Respondents noted the impact of shift change at the shipyard on traffic congestion in the local area, suggesting that this will worsen with additional workers if shift times are not staggered, and infrastructure is not upgraded.

Comments included:

- *“Traffic on Victoria Road and Port River Expressway is noticeably busier at the Shipyard shift change. Driving behaviours are often not safe. Having workers shifts more staggered would be beneficial.”*
- *“Consider workers shift hours and avoid the 3pm-4pm madness on the roads each day and Osborne evacuates. Working to avoid these times, i believe, is important to the entire peninsula.”*

Some respondents suggested enhancements to public transport options to accommodate increased transport demand on the peninsula. This included building upon the existing Outer

Harbor passenger rail service, and better utilising rail to transport goods in and out of the area. Incentives for workers to utilise public transport options were also suggested. Comments included:

- *“The future development (extension?) of the Outer Harbor Train Line is not adequately addressed in the EIS as it has the potential for development to off-set road traffic congestion during the SCY development and operation phase”*
- *“Victoria Road is already an extremely busy thoroughfare... I recommend that more use should be made of rail transport as the rail line runs right through the site.”*

The road network and constrained geography of the peninsula were raised in terms of the impact to transport and access. A number of respondents voiced concern about the feasibility of evacuation (at shift change and as part of any emergency scenario) given the spatial constraints of the peninsula. Comments included:

- *“Because it's a peninsula it would not support the infrastructure needed as far as medical and evacuation corridors.”*
- *“Being a long skinny peninsula, the road and bridge infrastructure is limited. I have been in major traffic jams on the Port River express and Northern Expressway, with no-one able to enter or leave the Port Adelaide area. If there was a major incident, it would be difficult to evacuate the residents of the Peninsula.”*

Quality of life and amenity

Additional noise and air pollution, and subsequent impact on amenity of the area, was raised as a key concern by 29 respondents.

This included concerns for the impacts on lifestyles of existing residents and the community's quality of life, as well as health impacts, particularly from diesel emissions, with references to worsening respiratory conditions.

Comments included:

- *“As a local resident, I am already troubled by impacts of the existing traffic and industrial activity on the Lefevre Peninsula. The noise and pollution of trucks along Victoria Rd and industrial operations are already incessant, disturbing my ability to sleep or feel at ease. We do not need more traffic, more industry, more noise, more pollution.”*
- *“Additional security restrictions in the local area will have adverse effects on lifestyle, living in the area, people coming in and out of the area. Life on the Peninsula will be changed forever.”*

Waste Transport

The risk of transporting nuclear waste through the suburbs of Adelaide and through a range of sensitive land uses was a key consideration for six respondents, with concerns regarding community safety and the potential for accidents.

Comments included:

- *“It's terrifying thinking materials for and from this project and then the waste from these submarines will be driven through residential suburbs. Too many potential dangers and risks.”*

Social Infrastructure

Five respondents raised concerns regarding the impact to levels of service for social infrastructure, such as health, education, retail and utilities, noting an existing poor level of service in these areas.

Comments included:

- *“Our Local shops are not adequate to service the extra cars / people that are using them”*
- *“An increased workforce will put additional strain on community, council, health and school facilities as well as electricity, water and waste management. This puts financial strain on everyone in City of PAE.”*

Catalyst for Development

Five respondents noted the positive impact in terms of investment and development on the peninsula and wider Port Adelaide area. Some responses highlighted the need for key worker housing.

Comments included:

- *“It will help the economy and redevelopment of the Port area. It will also help remove the cement works into a more suitable area Eg Wingfield and let the cement works area be used for housing which will stop the fallout over Port Adelaide”*
- *“All developments have some sort of effect on the local area. EG Roads and traffic, the installing of all services, and the like, but that is progress!”*

6.2.8 Feedback on economic benefits and challenges

Respondents were asked to provide feedback on the economic benefits or challenges the development could have on the local Port Adelaide community, Adelaide Metropolitan area or South Australia more generally. Overall, 119 people (or 75%) provided feedback on this topic, while 36 people provided no response and three people stated that they had no feedback.

Of the feedback provided, nine responses reiterated support for the development, noting that existing businesses will benefit from further investment in the area. Nine responses were related to the decision to use nuclear power (which is outside of the scope of this engagement). Overall, these responses raised issues and concerns regarding:

- Plans for end of asset life.
- National security, foreign policy and global politics.
- Ethics and cost to government.

Suitability of Industry

A number of respondents suggested that the industry of nuclear defence is not preferred for the peninsula, with 51 responses related to this topic.

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A high number of these responses expressed the desire for investment in other manufacturing and energy industries that are seen as more sustainable. These were viewed as being more suitable for the local area and the State economy.

Comments included:

- *“There are other ways to create jobs. A better way would be to embrace green manufacturing in order to facilitate the energy transition to renewable energy.”*
- *“A conventional submarine build really tailored for the defence of Australia’s coast would bring jobs at much less cost and long-term economic benefit.”*

A considerable number of these responses referenced the high cost and public investment required to support the industry, with the belief that this will divert funding from other essential services, projects and programs.

Comments included:

- *“The few jobs created on the project could be better spent on peaceful purposes such as more money for public hospitals, schools etc.”*
- *“Much of the Lefevre Peninsula is a low-socio-economic area A massive public investment in war manufacturing to benefit the US, likely this will divert funding from direly needed services and potential projects in welfare, health, education, housing and social programs. In other words: in meeting human needs.”*

Some respondents felt like the risks of the industry outweigh the proposed economic benefits, and suggested that the government is putting the economy ahead of human and environmental wellbeing.

Comments included:

- *“Not opposed to economic growth in the manufacturing industry. My question is, At what cost to the local environment and health and safety of the community? Do the economic benefits outweigh the catastrophic risks?”*

Respondents also felt that the nuclear defence industry was not suitable as it would be detrimental to quality of life.

Comments included:

- *“Not appropriate development. Not sustainable development or long term job creation. Potentially devastating to existing amenities, lifestyles and attractions - and the environment.”*

Employment

Employment was a common theme of feedback with [45 responses](#). This was raised from both positive and negative perspectives.

There were a range of positive responses related to employment. These were primarily focused on benefits to local workers through an increase in local jobs, and opportunities for partnerships with educational institutions for training and developing new skills for the industry.

Comments included:

- *"It should be positive, partnering with local schools is essential to fill some of the skill shortage gaps."*
- *"Hopefully it will inject money into the area creating employment and other communal facilities."*

There were a number of respondents who viewed these employment impacts negatively. This included disbelief that the proposed jobs will be suitable for locals and benefit the community, concerns that skilled workers will need to be brought in to fill these positions adding to existing pressures on housing and infrastructure.

A number of respondents suggested that most jobs will be within the construction phase only, and therefore not ongoing and some suggested that other industries would have been more appropriate for job creation on the peninsula.

Comments included:

- *"I am concerned that the local workforce is not skilled and therefore will benefit very little from this project. Even though there are training programs in place, I don't believe it will adequately full the 'thousands' of job placements. We will need to bring in additional people at a time when we have a housing/ rental crisis."*
- *"Any jobs created would be mainly in the construction phase with very few jobs needed into the future."*

Housing Demand

Housing was raised as a key theme by 8 respondents. These responses were a mixture of positive and negative regarding the additional demand for housing in the local area due to the development. While some believed this to be positive for the economy and investment in the area, others had concerns regarding increased demand for housing and impacts to housing affordability in the context of a housing crisis.

Comments included:

- *"Port Adelaide and the Western suburbs have the capacity to cover the expansion"*
- *"The jobs will be welcome I'm sure. Housing is tough as it is, will there be extra accommodation available somewhere? Or FIFO workers?"*
- *"I understand the need for more housing developments however I am sorry there are not more trees and green space and river access incorporated into such developments."*

Transport Infrastructure

Some respondents reiterated the need for significant investment in transport infrastructure, with six responses relating to this topic. Some of these respondents raised concerns regarding the impact of increased traffic on the amenity of the area.

Comments included:

- *“Significant state and federal gov investment in Port Adelaide, Largs and Semaphore required. In particular, parking and public transport. Tram line and /or buses between Port Adelaide, Semaphore Largs and North Haven”*
- *“Traffic management is a big issue”*

6.2.9 Feedback on management of nuclear-powered propulsion systems

Respondents were asked to provide feedback on how the nuclear-powered propulsion systems are managed. Overall, 112 people (or 71%) provided feedback on this topic, while 34 people provided no response and four people stated that they had no feedback.

Of the feedback provided, 15 responses related to the decision for the use of nuclear-powered propulsion systems (which is outside of the scope of this engagement and EIS). Overall, these responses raised issues and concerns regarding:

- Foreign policy and global politics.
- Ethics and cost to government.

Risk

Risk was a key concern for 55 respondents when considering the proposed management of nuclear-powered propulsion systems. These responses spanned risks to human health and the environment in the event of an accident, security risk posed by transporting nuclear products, emergency management, and waste storage.

Most responses in this topic focused on the risk of accidents and the impact on people and the environment. Many respondents had concerns for human error and noted that any malfunction or accident could release radioactive materials, posing serious risks to both human health and the environment. A number of people referenced historical incidents, such as submarine reactor failures, as a reminder of these risks.

Comments included:

- *“Accidents happen regardless of how well managed things are. The nuclear aspect is a bit scary and unknown for me”*
- *“Every step of Nuclear-powered production, transport and storage creates more chances for things to go wrong”*

Some respondents were concerned for the security risk for the local area, and Adelaide more broadly. These responses noted that these systems are potential targets for theft or sabotage, raising serious concerns about security.

Comments included:

- *“It is hard to believe that transporting the units to Port Adelaide can be guaranteed to be entirely risk free... Construction and docking of nuclear submarines will make Port Adelaide a potential target in the case of conflict”*

Concerns were also raised by respondents about the lack of detail provided regarding emergency management and evacuation procedures in the case of an incident. Some of these respondents questioned the robustness of the assessment as a result.

Comments included:

- *"I complain vigorously about the lack of public consultation and the lack of information for the public on safety, what will be stored on site, what evacuation and emergency plans are..."*
- *"Local emergency services may not be adequately trained or resourced to handle nuclear-related incidents, posing serious risks to the surrounding community."*

A number of responses were concerned with the risks of storing radioactive waste. Respondents noted that the disposal or storage of this waste can result in environmental contamination, causing long-lasting ecological harm.

Comments included:

- *"There is no publicly available long-term plan for managing radioactive waste, including contamination risks associated with maintenance, testing, and decommissioning."*
- *"There is no safe way to store nuclear waste (temporary or long term). Not in my backyard!!!"*
- *"I am more concerned about waste than new, sealed, inactive equipment. There needs to be a clear strategy and a transparent system so that the "nuclear debate" is not adversely fuelled."*

Support for Approach

18 responses supported the proposed management of nuclear-powered propulsion systems, suggesting that they trust the technologies and controls in place to suitably manage the risks.

Comments included:

- *"... Although this is new technology to Australia, this is not new technology throughout the world. It's been proven to be safe, no concerns from me"*
- *"There is no risk to the community. These are well designed and controlled units. People just require further education to aid in dismissing myths"*

Suitability of Location

15 responses related to the suitability of the proposed location, as a densely populated suburban area and in close proximity to Greater Adelaide and a range of sensitive land uses.

Comments included:

- *"Yes, we do not want anything nuclear stored a stone's throw away from local residences, schools and businesses"*
- *"Not within 10km of any school, kindy or homes!!!"*
- *"The levels of security that will surround this development will severely impact on local access to the estuarine environment. Equally, the visual presence of such security measures will transform"*

the northern end of the peninsula into a militarized security zone as demanded by the American suppliers of the propulsion systems.”

External Management

Five respondents noted concerns about the management of nuclear-powered propulsion systems due to the systems being externally managed by another country. These responses noted the lack of control that Australia will have in management and decisions related to these systems.

Comments included:

- *“No...it appears they are managed externally and we have no control...this is outrageous...madness.”*
- *“Manage them in the countries they came from. Don’t let them into Australia.”*

Time and Cost

Five responses related to the time and cost of the proposal. These respondents doubted the feasibility of the development due to the time and cost involved in building supporting infrastructure. Comments included:

- *“If the nation doesn’t have the skilled labour and facilities required to build the infrastructure than how is it expected to be maintained and improved without significant cost. Operational costs will continue to blow out taking an already expensive endeavour and making it fiscally irresponsible”*
- *“A short time is years, let’s be honest, building a submarine of this complexity takes years and they will be built as a production line meaning a nuclear reactor will be there all the time.”*

6.2.10 Any other feedback or information

Respondents were asked if they had any other feedback or information to share about the proposed nuclear-powered submarine construction yard and the EIS.

Overall, 108 people (or 68%) provided additional feedback, while 46 people provided no response and three people stated that they had no other feedback.

The majority of responses to this question reiterated themes and concerns raised in other survey questions.

A breakdown of the ‘other’ feedback received is as follows:

- Support for the development: 17
- Against the development: 61
- Transparency of process: 20
- Other (Traffic, Safety, Sustainability etc.): 8

Transparency of process

20 respondents raised issues with the decision-making process that could enable the proposed development. This was raised both in terms of the EIS documentation and more broadly regarding a lack of democracy in political decision making on the project.

Comments included:

- *"The EIS doesn't adequately address the issues of waste. There is no discussion of an emergency response or what would be done in the event of an accident. There is a general lack of detail. Many community concerns are ruled as 'out of scope' of the report."*
- *"The report also gaslights the whole local community. It acknowledges that the local community "may feel perceived impacts", but that these don't count because the study apparently thinks it didn't "identify any significant effects" and in fact the project will result in "social and community benefits and impacts". Ignoring the community's legitimate questions and concerns is not a good pathway to support buy-in."*
- *"Information has not been widely disseminated across the whole of SA, and much of the report is sadly lacking in some details particularly around Waste Management, Waste Storage, Nuclear Accident. Whilst it is in a local area and much too close to this area, there are also implications for the whole of SA and these are not being made public..."*
- *"Australians were NEVER consulted about this. Australians have never had to chance to properly vote on AUKUS. The major parties haven't allowed this. This flies in the face of democracy."*
- *"There was no consultation with the community just another deal with the US to waste tax payers money and put us in danger."*

6.3 Drop-in Sessions

Four drop-in sessions were held in February 2025 at three public venues with a total attendance of 156 people:

- State Library, Wednesday 19 February, 11.30am to 1.30pm, 33 attendees.
- Port Adelaide Plaza, Thursday 20 February 2025, 5pm to 7pm, 47 attendees.
- Lefevre Community Stadium, Friday 21 February 2025, 1pm to 3pm, 30 attendees.
- Lefevre Community Stadium, Saturday 22 February 2025, 1pm to 3pm, 48 attendees.

These sessions provided an opportunity for the community to meet the project team and ask questions. They were spread over four days and held at different times to cater for people's schedules.

Of the 156 people who attended the drop-in sessions, 1 provided a written submission at the session.

The general feedback at the drop-in sessions included:

- Construction timelines.

- Business and employment opportunities.
- Training facilities.
- General interest in the project and what would be built on site.

Concerns raised by attendees included:

- Traffic implications and the need for road upgrades.
- Environmental concerns including flood risk and the potential for site contamination and spills.
- Lack of Emergency Response Management Plans in the EIS.
- River dredging and other river impacts.
- Nuclear waste storage.
- Fear that the SCY facility would increase the threat risk and make the Peninsula a military target.
- Consultation process including First Nations engagement.
- Government transparency particularly the exclusion of protected matters in the EIS.

6.4 General Enquiries

There were 2 email enquiries received from community members during the engagement period which were responded to by PlanSA staff.

7. Our Response and Recommendations

7.1 Clarification on Nuclear-Related Matters, Capital Dredging and Out of Scope Matters

7.1.1 Nuclear-Related Matters

The SCY has generated public interest and comment, particularly in relation to nuclear safety, radioactive waste, and potential environmental hazards as a result of the temporary protected storage of the Propulsion Systems within the SCY. The Proponent acknowledges this interest and the importance of these matters.

As outlined in the EIS within Chapter 1: Introduction, Chapter 3: Legislation and Procedural Requirements and Chapter 4: General EIS Requirements, these matters fall outside the jurisdiction of the State's planning assessment and approval process and are addressed under Commonwealth requirements.

Whilst the EIS has addressed these issues to the extent possible, it is important to reaffirm that:

- Nuclear components that form part of the wider SCY project, including Propulsion Systems, are subject to Commonwealth regulation under the *Australian Radiation Protection and Nuclear Safety Act 1998* (ARPANS Act) and the forthcoming Australian Naval Nuclear Power Safety Act 2024. This includes the transport and delivery, storage, commissioning and testing of the submarine and safety systems, in addition to radioactive waste production, storage and transportation.
- The State based EIS cannot and does not approve or license defence related nuclear activities. These are the responsibility of the relevant Commonwealth authorities.
- The Strategic Assessment being undertaken at the Commonwealth level has excluded certain nuclear matters (e.g., the storage and disposal of low-level waste and Propulsion Systems) until further detailed information is available. These matters will be assessed and approved under separate Commonwealth approval processes.

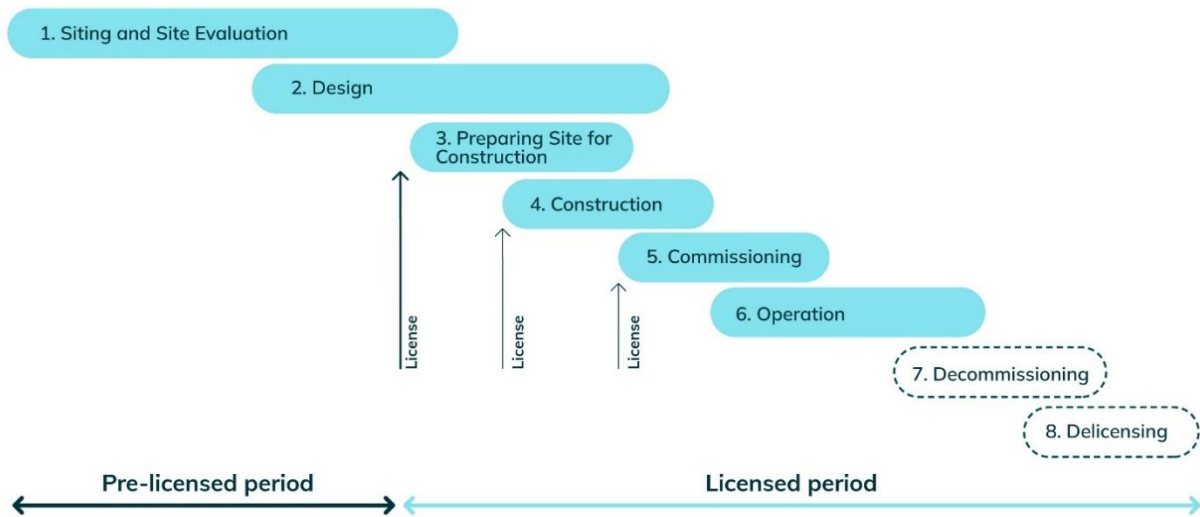
Importantly, an emergency preparedness and response system will form an important component of the ARPANSA assessment and licensing process. This includes detailed assessment and modelling of potential accident scenarios, emergency preparedness measures, and public protection strategies in accordance with international best practice. These processes are governed by the International Atomic Energy Agency (IAEA) Safety Standards and the Safety of Radioactive Waste Management, to which Australia is a signatory.

The ARPANSA licensing process includes multiple stages, from site preparation and construction through to operation, decommissioning, and disposal (See Figure 8 below), and ensures that nuclear safety and emergency management are embedded throughout the lifecycle of the SCY. Consultation is part of this process, and therefore the community will be further consulted on these aspects of the project. These measures will be independently assessed and regularly reviewed by ARPANSA and the Regulator. The Licensing Process is outlined in detail on the ARPANSA

website⁴. Several licences are to be sought through the course of the planning, construction and operation phases of the SCY. These include:

- Prepare a site.
- Construct facility.
- Possess or control a facility.
- Operate a facility.
- Decommission.
- Dispose of or abandon a facility.

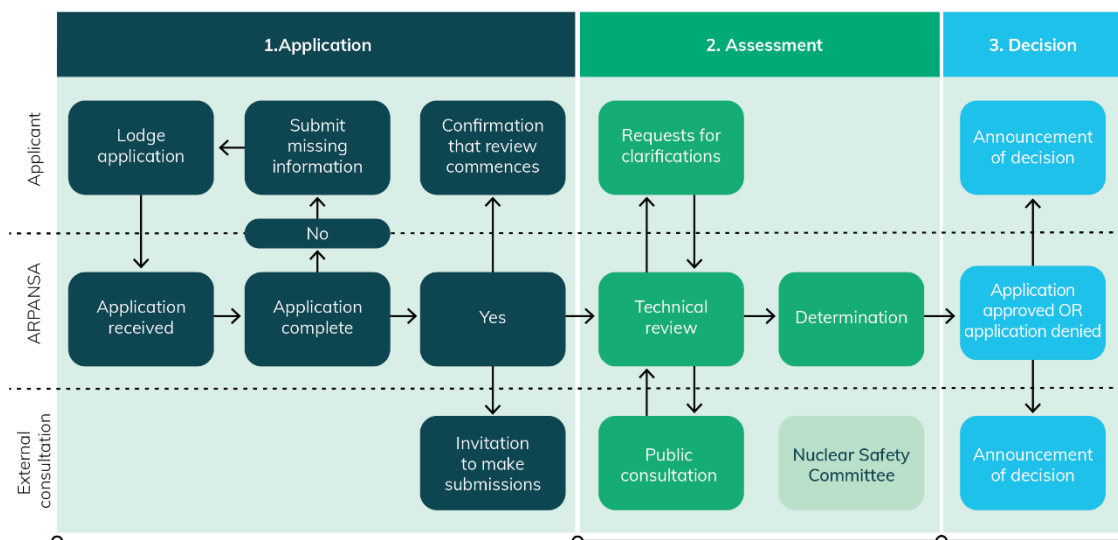
Figure 8: Process for Gaining a Site License for a Controlled Activity (note this figure was Figure 3.2 of Chapter 3 of the EIS)



The ARPANSA Regulatory Assessment Process for each licence application is shown within Figure 9 below. A key step in the ARPANSA Regulatory Assessment Process is consultation. Consultation under the ARPANSA Act ensures decisions on licence applications are transparent, well-informed, and robust, while acknowledging that stakeholder views inform, but do not determine, the outcome.

⁴ <https://www.arpansa.gov.au/regulation-and-licensing/safety-security-and-transport/radioactive-waste-disposal-and-storage-3>

Figure 9: ARPANSA Regulatory Assessment Process (Source: ARPANSA.gov.au⁵)



Baseline monitoring is currently underway to establish existing radiological levels prior to the establishment of the SCY. This information will contribute to an ongoing monitoring program informed by the baseline results during the operation phase of the SCY. The baseline and future radiological and environmental monitoring program is one of a number of measures to be implemented to ensure the protection of people and the environment. Monitoring is part of the ARPANSA Licensing Process.

Accordingly, no further significant responses will be provided regarding nuclear specific concerns within this State level Response Document, as these are not within the remit of the State planning system. These concerns will be fully addressed through the ARPANSA licensing process and associated Commonwealth approvals, which are comprehensive, transparent, and based on international best practice, including standards set by the IAEA.

Consultation responses received for the EIS and Strategic Assessment relating to these matters have been captured and will however be included for further consideration and inclusion in the assessment and approvals process under the ARPANS Act.

7.1.2 Dredging

A number of submissions raised questions about capital dredging activities required to support vessel egress/access to the SCY via the Port River. The Proponent acknowledges this interest and provides the following clarification. As outlined within the EPA SA Dredge guideline⁶, “Capital dredging is the excavation of solid matter (including organic matter) that occurs in an area which

⁵ ARPANSA Information for stakeholders - 4. The Licensing Process. <https://www.arpansa.gov.au/regulation-and-licensing/safety-security-and-transport/radioactive-waste-disposal-and-storage-3>

⁶ EPA South Australia Dredge guideline, 2020. https://www.epa.sa.gov.au/files/14712_dredge_guideline_2020.pdf

has previously not been dredged.”, and generally concerns projects aimed at creating new or expanding existing navigation channels, berthing areas, or turning basins.

As outlined within Chapter 1: Introduction of the EIS and the Government Gazette Notice declaring the SCY an Impact Assessed Development, capital dredging of the Port River navigational channel and basin, as well as maintenance dredging, were excluded from the scope of the EIS. The Gazette Notice (Schedule 1(a)(iv)) makes clear that while dredging related to the construction and operation of vessel berths at the SCY is included, dredging for the purpose of deepening the Port River Channel is not. This position remains unchanged due to the following reasons:

- **Uncertainty around final design specifications:** At the time of project declaration, and still currently, the submarine designs are not finalised. As such, it is not yet possible to define the exact channel depth requirements needed to support their movement.
- **Timing of future dredging needs:** Dredging for operational purposes will not be required for at least a decade, given the anticipated shipyard construction timeline and commissioning of the first submarine. Approvals for dredging would therefore be more appropriately sought closer to the time of actual need.
- **Emerging alternative technologies:** Other technological innovations that may reduce or eliminate the need for dredging altogether. These options are not yet confirmed but could significantly change the need and potentially scope of any future dredging works.
- **Potential for separate or collaborative dredging efforts.** Future dredging may be undertaken by Flinders Ports Corporation as part of broader port maintenance or improvement works. Should future dredging for the port be required in the future it is possible that the extents required could address the project related requirements in full or in part, or be coordinated through a joint dredging program.

Importantly, any future dredging activities will be subject to their own separate environmental assessment and approval processes, in accordance with applicable legislation and guidelines at the time.

It is also noted the Port of Adelaide has been subject to previous dredging and has a long-established track record of successful dredging operations. Given this, the ability to establish navigable access to the SCY is not considered a fundamental development constraint. For these reasons, no further assessment of capital dredging has been included in the current EIS, and no additional responses is contained within the Response Document.

7.1.3 Out of Scope Matters

As part of this engagement, several themes have been raised which, while understandable given the nature of the SCY, fall outside the legislative and technical remit of the EIS. These include:

National Security, Foreign Policy and Global Politics

Matters relating to national security, foreign policy, and global geopolitical considerations are the responsibility of the Australian Government and relevant defence and diplomatic authorities. The EIS cannot assess or respond to policy or strategic defence decisions.

These matters are not within the scope of an EIS assessment process, which is primarily concerned with the assessment of environmental, social and economic impacts resulting from the construction and operation of the SCY infrastructure.

Ethics and Cost to Government

Concerns regarding the ethical justification for AUKUS tri-lateral security partnership, the program or its cost to the government fall within the realm of broader public policy debate and decision-making by elected representatives. The EIS process is not a mechanism for financial analysis or ethical review, its focus is limited to identifying, assessing, and mitigating potential environmental, social and economic impacts as defined under the South Australian planning legislation.

Limited Access to Project Information

While it is recognised that the public may wish for more detailed information regarding certain aspects of the SCY, some details are not able to be provided due to national and project security requirements.

The EIS includes sufficient information necessary for the purpose of environmental, social and economic assessment, to respond to regulatory requirements. Transparency has been maintained to the fullest extent permissible under those constraints.

End of Asset Life Considerations

Comments relating to the decommissioning or end-of-life management of the submarines and the Propulsion Systems have been received. However, these considerations were explicitly scoped out of this EIS, because the SCY is specifically for the construction of submarines not decommissioning. Should future stages of the submarine's life require environmental approvals, they will be subject to separate assessment processes in accordance with applicable legislation at that time.

7.2 Community Feedback

The Proponent acknowledges the valuable feedback provided by the community. A number of common themes and concerns emerged across multiple submissions. To provide a clear and comprehensive response, we have grouped the feedback into key topics/themes and addressed each collectively, rather than responding to individual submissions separately. This approach allows us to more effectively address shared concerns and highlight the broader context around each issue.

No response to submissions which are **supportive** of the SCY have been provided. However, as outlined within Section 6.2.3 of this Response Document, 20% of community feedback received was supportive of the SCY, with an additional 11% supportive provided that their concerns can be addressed. It is considered that all concerns raised have either already been address within the EIS or can be addressed via the commitments outlined within this Section of the Response Document. As such, it is considered that over 30% of respondents who provided feedback are supportive of the SCY.

7.2.1 Air quality

In response to comments raised regarding the potential for reduced air quality along Victoria Road and the area surrounding the subject site, Chapter 7: Air Quality of the EIS provides a detailed assessment of air quality, which was informed by the Air Quality Assessment provided within Appendix 1.1 of the EIS.

The Air Quality Assessment for the development has been undertaken in full accordance with the EPA guidance and the Air Quality Environmental Protection Policy 2016 (Air Quality EPP 2016). The air quality criteria established in the Air Quality EPP 2016 are based on scientific evaluation and are designed to be protective of human health, including sensitive populations. The EPA has also confirmed that they have no specific concerns in relation to the overall approach and findings of the Air Quality Assessment. This indicates that the SCY, as proposed, is not expected to result in significant air quality impacts and aligns with regulatory expectations and current health-based standards. The EPA agreed that there will be a need for additional assessment work as the design develops to inform the preparation of management plans and EPA licenses for the SCY.

Additionally, as noted within the EIS, the traffic model that informed the Air Quality Assessment was intentionally conservative, representing a worst-case scenario for initial assessment purposes. The findings of the operational transport emissions assessment within Appendix 1.1 found that the maximum predicted concentrations of the primary air pollutants associated with vehicles projected to be travelling on Victoria Road and access routes were assessed below relevant criteria at all receptors modelled in 2034.

The traffic model accounts for regional growth (including Metropolitan Adelaide and the Lefevre Peninsula Masterplan), existing ANI operations, and the SCY development site but does not yet factor in mitigation measures such as public transport usage by construction workers, fleet electrification, or sustainable fuels. Importantly, even under this worst-case scenario, the modelling demonstrated that all predicted pollutant concentrations remain below the thresholds established in the Air Quality EPP 2016 at the sensitive receptors assessed.

Therefore, regardless of the potential implementation of further mitigation measures such as increased public transport usage by construction workers, electrification of the vehicle fleet, or adoption of sustainable fuels, the assessment has demonstrated that air quality outcomes are acceptable under the current assessment framework.

Commitment:

As detailed in Section 7.6.1 of Chapter 7: Air Quality, the Project partners will ensure the SCY undertakes the following:

Construction

A Construction Air Quality Management Plan (CAQMP) will be developed and included in the CEMP. The CAQMP will document dust control measures and monitoring where required during construction.

Operation

An Operational Air Quality Management Plan (AQMP) will be incorporated into the OEMP. The AQMP will document relevant infrastructure's air quality control strategies embedded in the design, as well as any maintenance and monitoring requirements.

Other Approvals/Licensing

The SCY will be constructed and operate in accordance with the necessary EPA licences under the *Environmental Protection Act 1993* (EP Act) for activities of environmental significance, ensuring compliance with regulatory requirements.

7.2.2 Biosecurity

In response to comments raised that the SCY has potential to result in the spread of exotic species or pests, Chapter 11: Biosecurity of the EIS undertakes a detailed assessment of biosecurity concerns associated with the SCY.

The EIS acknowledges broader biosecurity considerations and outlines the comprehensive management measures that will be implemented through a Biosecurity Management Plan (BMP) to prevent the introduction and spread of marine and terrestrial pests. These measures ensure that construction and operational activities, including submarine vessel movements, do not contribute to the transport of pests or diseases to other locations. Given these robust controls, which will be secured by planning condition on the development approval, the risks of exotic species, pests or disease transfer are considered to have been appropriately addressed and mitigated within the EIS.

Additional, in the marine context, while vessel traffic within the Port River is high, the submarines will be constructed on the subject site and launched directly into the Port River. The SCY will not generate high vessel traffic, as no docking of vessels from overseas or interstate at the subject site is required. This is not feasible for two key reasons: during construction, no docking facilities will be available, as the development itself will not yet exist and, during operation, the development is not designed to accommodate container ships or facilitate the direct delivery of significant quantities of materials by sea.

While some vessels will transport goods and materials for the development, these vessels will not be owned or operated by the Project partners, nor will they dock at the subject site or the existing ONS facility as outlined above. All operational maritime vessel movements related to material deliveries will be coordinated with the Port Operator (Flinders Ports Holding), following routine practices for importing and receiving materials into South Australia and in full compliance with regulatory biosecurity requirements.

Given these considerations, the potential for exotic species or pests to spread from the subject site to other locations throughout the State (both marine and terrestrial) has been addressed in the EIS, with further detail to be provided in the forthcoming BMPs which would be secured by condition on the development approval. Additionally, any biosecurity risks associated with general imports into the Port are managed under existing regulatory requirements and industry frameworks. As such, broader biosecurity controls for vessel movements and imported materials fall under established existing State and national biosecurity regulations.

Commitment:

As outlined in Section 11.6.1 of Chapter 11: Biosecurity, the Project partners commit to the following measures to address biosecurity risks:

Construction

A Biosecurity Management Plan (BMP) will be developed and included in the CEMP. The BMP will set out strategies and procedures to manage biosecurity risks during construction where they apply to the development, aligned with established terrestrial and marine industry practices.

Site soils and imported fill will be managed under a Materials Management Plan, also part of the CEMP, to ensure effective weed management, including Declared Plants.

A Dredge Management Plan (DMP) will be prepared, including provision to address and minimise biosecurity risks associated with dredging activities.

Operation

A BMP will be incorporated into the OEMP to manage biosecurity risks during operation. This will include weed management as part of routine maintenance, consistent with routine practices at the existing ONS.

7.2.3 Community well-being

Public submissions raised concerns primarily relating to the potential for an unplanned incident or nuclear material leakage as well as potential health consequences from poorer air quality.

Please Refer to the Air Quality response above in relation to health consequences from poorer air quality.

Regarding the concerns related to unplanned incident or nuclear material leakage and community well-being, Chapter 23: Community Wellbeing/Social Impact Assessment and Appendix 1.19 provide an assessment of the SCY in relation to these matters. Additionally, as outlined within Section 7.1 above, emergency preparedness and response system in relation to nuclear-matters for defence projects is an important consideration of the ARPANSA licensing process.

Additionally, as outlined within Figure 9 above, a key step in the ARPANSA Regulatory Assessment Process is consultation, which would allow for members of the public make representations on the emergency preparedness and response system and the licence application.

7.2.4 Site Contamination

Public submissions raised concerns relating to potential for contamination impacts from the proposed construction activities, particularly those involving dredging and the historic land reclamation activities. Specific issues included potential water turbidity, seagrass degradation, bioaccumulation of toxins in local marine life (including dolphins), and human health risks through the consumption of affected fish.

The EIS has thoroughly assessed these issues, refer to Chapter 19: Contamination and Chapter 12: Marine Flora and Fauna. The content includes both consideration of historical contamination and

the risks associated with proposed construction and operational activities on human and marine receptors.

These assessments were informed by site investigations, including targeted studies conducted specifically for the EIS as included within Appendix 1.14. Key findings included:

- While historic land uses in the area have resulted in some known contamination, recent investigations for the EIS did not identify significant contamination, with only isolated detections of copper (in one sample from Area 1) and lead (in one sample from Area 2).
- Groundwater in the area has been impacted historically, and potential risks to both human-controlled waters (groundwater and surface water) and ecological waters (such as habitats for flora and fauna) have been fully assessed.
- The EIS concluded that potential environmental effects as a result of existing contamination and future construction and operation activities are not significant.

To ensure protection of the environment, the following environmental management plans as part of the CEMPs and OEMPs are to be implemented. These include:

- Soil, Erosion and Drainage Management Plan (SEDMP) – during construction
- Spoil Management Plan – during construction
- Acid Sulfate Soil Management Plan (ASSMP) – during construction
- Dewatering Management Plan – during construction and, should it be required during operation
- Stormwater Management Plan (SMP) – during construction and operation.

These management plans will be specifically designed to prevent and control any potential contamination or water quality impacts, including through containment strategies, spill response protocols, and stormwater management. Supplementary site investigations are anticipated that will be undertaken during detailed design to confirm and refine existing data.

While some community members have expressed opposition to the SCY due to perceived environmental risks, it is important to note that the EPA has reviewed all existing data, findings, and proposed management measures presented in the EIS in relation to contamination. The EPA is satisfied that the assessment provided within the EIS is sufficient and that the proposed mitigation and management strategies are appropriate. With these controls in place, the development has demonstrated it can proceed without causing significant environmental harm to human and marine receptors.

Commitment:

As outlined in Section 19.6.1 of Chapter 19: Contamination, the Project partners are committed to the provision to the above-mentioned management plans which form part of the CEMPs and OEMPs address contamination risks.

7.2.5 First Nations Engagement/Rights

Public submissions raised concerns that more engagement with First Nations people about the proposal and protection of Aboriginal heritage on the SCY should have been undertaken.

The Proponent, in partnership with ASA, commenced ongoing engagement with Kurna Yerta Aboriginal Corporation, as the nominated registered native title bodies corporate (RNTBC), focusing on project design and delivery, in addition to broader opportunities and outcomes for Aboriginal people beyond the requirements of the Aboriginal Heritage Act (AH Act). This approach ensures that Aboriginal engagement has been embedded in the development from its early stages and will continue from design, construction and ultimately operation.

Additionally, Chapter 22: Aboriginal Cultural Heritage and Appendix 1.18 has assessed the subject site as being at low risk of encountering unknown Aboriginal heritage sites. There are no known registered Aboriginal heritage sites within the subject site. Therefore, there are no direct or indirect impacts to known Aboriginal heritage sites as a result of the SCY and this was not required to be subject to further assessment in the EIS.

The Aboriginal Affairs and Reconciliation (AAR) confirms the risk of discovering unknown Aboriginal heritage during construction for the SCY as low and accepts as appropriate, that the CEMPs will embed strategies and procedures to ensure parties understand their legal obligations under the AH Act in the unlikely event of unexpected discoveries of Aboriginal heritage during construction.

Commitment:

The Project partners are committed to ongoing engagement with the Kurna Yerta Aboriginal Corporation for design and construction of the project. During construction, the CEMP will also include specific strategies and procedures to ensure construction personnel are aware of the potential to encounter unknown Aboriginal heritage sites, and that appropriate processes are followed in accordance with a documented site discovery procedure.

7.2.6 Flooding/Climate Change

Public submissions identified the potential risks regarding future sea level rises due to climate change and potential impact on the surrounding areas as a result of flooding.

The Proponent recognises these concerns regarding climate change, and climate change adaptation has been a key design consideration for the SCY as outlined within Chapter 14: Climate Change Adaptation. The SCY has and will continue to be designed in accordance with all relevant South Australian planning policies, flood risk assessments, and mitigation guidelines, as prescribed by the PDI Act and the State Planning Policies, including relevant provisions under the Coastal Protection Branch and the broader DEW as outlined within the EIS. The SCY, through its design has, and will continue to take all reasonable and necessary steps to mitigate risks associated with climate change within the subject site boundary, ensuring that the SCY site itself remains resilient to such events. DEW has acknowledged this position in its response to Chapter 14: Climate Change Adaptation. All relevant South Australian planning policies, flood risk assessments, and mitigation guidelines will continue to be reviewed as the SCY design evolves and is finalised.

In addition, the legal and planning framework in South Australia establishes that developers are responsible for addressing the direct impacts of their developments, not for pre-existing or external natural hazards. The design, construction and operation of the SCY has no control over the broader climate change related risk events outside the subject site and cannot be held accountable for how climate change related risk events interact with other areas within the surrounding area as a result of naturally occurring events.

With respect to flooding, the Lefevre Peninsula is recognised as being susceptible to storm and tidal surge flooding due to its low-lying topography, with many areas sitting below recorded high tide levels. The flood risk assessment, included within Chapter 18: Flooding, undertaken for the SCY has demonstrated that, based on the current design as outlined within Chapter 2: Description of the Development, the SCY will not increase storm or tidal flood risk to surrounding area. While it is acknowledged that the development will alter how water is distributed across the subject site and potentially within the broader peninsula, these changes are not considered to be sufficient to introduce additional risk and remain consistent with the peninsula's existing flood context.

The surface water management modelling presented within the Stormwater Management Plan (SMP), Appendix 1.14, has been prepared using the currently available design information to establish evidence of concept for the stormwater management at the subject site.

This preliminary modelling demonstrates that the SCY is capable of managing its own surface water without increasing flood risk to surrounding or downstream areas. As the design of the SCY progresses, more detailed hydrological and hydraulic modelling will be undertaken to inform the final SMP and strategy for the subject site. This future work will ensure stormwater management remains integrated with the development of the design and aligned with contemporary best practice, as well as any future requirements subsequently identified for the Peninsula. A condition on the development approval will secure the requirement for this additional modelling, the development of a final management plan, ensuring appropriate oversight and implementation, and sustainable stormwater management outcomes as outlined within the findings of the EIS.

Commitments

In addition, as outlined within Chapter 14: Climate Change Adaption and Chapter 19: Flooding, the SCY will be designed to manage flood risks by setting ground levels above the 1% AEP storm tide and overland flow events, or a minimum of 3.30 m AHD. Building floor levels will be at least 300 mm above the 1% AEP flood level or 3.55 m AHD, in line with the Planning and Design Code. A safe evacuation route will be maintained, or a shelter-in-place option will be provided above flood levels. Off-site flood impacts will be limited to a ± 20 mm change during major events. Final levels will be refined through detailed flood risk assessments, which will consider climate change, sea level rise, and other long-term factors. Critical infrastructure will also be protected against more extreme flood events, with final design levels to be confirmed.

Separately, and in addition to the design and EIS investigations to date, the SCY will be built to nuclear licensing requirements, which include provisions to ensure protection against extreme weather events.

Additionally, the Proponent will work with the DEW to ensure that the SCY remains aligned with broader regional flood management objectives and that wider regional flood behaviour, particularly

in the context of storm surge events, remains under the jurisdiction of State and local authorities. While the SCY will be integrated within this broader context, it is not expected nor able to address or resolve existing regional hydrological challenges that are not a consequence of the SCY itself.

7.2.7 Marine Flora and Fauna

The Proponent appreciates the concerns raised in relation to the impacts on marine flora and fauna, including seagrass meadows and dolphins, and the ADS. These concerns have been carefully considered and assessed in the EIS, even if they are not immediately apparent without a detailed reading of the EIS. The assessment of impacts on marine flora and fauna, including resident and transient dolphins and whales and seagrass, was assessed in detail within Chapter 12: Marine Flora and Fauna (Chapter 12).

Regarding the potential effect to seagrass, Chapter 12 provides an assessment of the baseline marine environment within the subject site, covering approximately 12 hectares of the Port River. However, the potential actual area of the Port River to be affected by the SCY will likely be significantly smaller, and as such the EIS documents a worst-case assessment. High-level mapping (Figure 12.2 of the EIS) identifies the primary benthic habitat as sand, with some patches of sparse to moderate density seagrass (i.e., native vegetation), microalgae, and rock ledges. Given the already disturbed nature of the Port River, subject to regular dredging and stormwater inflows, the benthic habitat in the subject site and surrounding area is classified as being a 'Very Low' sensitivity receptor.

The assessment within Chapter 12 identifies only a few small patches of sparse seagrass (see Figure 12.2) and a very limited area of moderate-density seagrass within the marine-based portion of the development site in Area 3. These may require removal to accommodate the SCY. Additionally, other seagrass beds and potentially fringing mangroves in the wider Port River could experience indirect impacts due to increased water turbidity. The magnitude of impact from direct seagrass removal, resulting from construction dredging and coastal infrastructure development, is classified as 'High'. However, the magnitude of indirect impacts on seagrasses and mangroves is assessed as 'Very Low,' given that these effects are temporary, short-term, and reversible.

As such the assessment within Chapter 12 concludes that the significance of effects from direct removal of seagrass is classified as a Long-term, Minor Adverse Effect, while indirect effects from increased water turbidity are assessed as Short-term, Negligible Effect. Additionally, the construction of marine infrastructure in Area 3, where potential seagrass removal may be required, is not scheduled to occur for several years. During this time, the baseline condition of seagrass in the area will naturally change, with seagrass coverage potentially expanding, contracting, or shifting due to environmental factors. Furthermore, depending on the final design and the location of seagrass at that time, it is possible that no seagrass removal will be necessary.

The proposed marine infrastructure works within Area 3, the only part of the SCY that affects the marine environment, will be highly localised, covering just 0.1% of the total area of the ADS.

The resident dolphins, as well as other fauna, of the Port River are known to move freely throughout the river and estuary system, which will continue to offer suitable habitat. The dolphin population is already accustomed to the commercial and ongoing port-related activity along the Port River, which the SCY will replicate along the river frontage of Area 3.

Based on this information, and considering the findings of the baseline environmental studies, these short-term, small-scale activities are not expected to displace the dolphin population or cause significant impacts. While minor, temporary avoidance behaviour may occur during construction, the dolphins are anticipated to return to that part of the Port River once construction activities conclude. Concerns that the SCY will force dolphins or other marina fauna to permanently leave the area and cause significant long-term impacts are not supported by current evidence or past experience.

The EIS outlines specific mitigation measures to reduce the risk of disturbance, including scheduling of works and management of noise and vibration.

Commitment:

As outlined within Section 12.6.1 of Chapter 12: Marine Flora and Fauna, the Project partners are committed to the following to ensure that effects with respect to marine flora and fauna are addressed.

Construction

A Marine and Coastal Environmental Management Plan (MCEMP) (or equivalent) will be developed and incorporated into the CEMP. The CEMP will also include:

- A Construction Stormwater Management Plan (SMP) to manage discharge of stormwater and construction wastewater and minimise any potential for impact to the adjacent protected ADS.
- A BMP covering management of invasive or harmful marine flora and fauna.
- A Dredge Management Plan (DMP) covering mitigation and management of potential dredging impacts to the marine environment, flora and fauna.
- Measures to manage lighting, and all temporary external lighting will be designed to minimise the risk of light spill outside the area it is desired to illuminate; and particular care will be taken to minimise light spill into surrounding habitat.

Operation

A MCEMP will be developed and incorporated into the OEMP for the development. The OEMP will also include a BMP addressing management of invasive or harmful marine flora and fauna.

A SMP will be prepared during detailed design that takes into account climate change and will ensure that surface runoff from the development are controlled, that infiltration of runoff incorporated during detailed design (where possible and practical) and that any potential pollution events from the development during operation are appropriately managed through the use of settlement basins, filtration areas, interceptors and / or silt traps etc.

7.2.8 Noise

Public responses identified the potential that industrial noise would increase with the SCY development, citing that in some locations, from some commercial and industrial sites it was already a problem on the Peninsula.

The operational noise assessment included within Chapter 8: Noise and Vibration of the EIS confirmed that the noise levels from the operation of all facilities at the SCY site, in combination with the existing ONS facility, can comply with the relevant EPA Noise Environment Protection (Commercial & Industrial Noise) Policy criteria. As such, no new impacts were identified. The EPA has reviewed all data, findings, and proposed management measures presented in the EIS in relation to operational noise and are satisfied that the assessment provided within the EIS is robust and that the proposed mitigation and management strategies are appropriate. With these controls in place, the SCY can proceed without causing significant environmental harm to noise sensitive receptors.

Commitment:

As outlined within Section 8.6.1 of Chapter 8: Noise and Vibration, the Project partners are committed to the following to ensure that effects with respect to noise and vibration are controlled within acceptable limits.

Construction

A Construction Noise and Vibration Management Plan (CNVMP), as part of a broader CEMP, that considers the adopted assessment criteria and sensitive receptors will be prepared and implemented during construction. The CNVMP will include mitigation measures to minimise noise and vibration including that best practicable means will be applied during construction works to minimise noise and vibration at neighbouring residential properties and other sensitive receptors.

A DMP, required for the marine and coastal interface works, will be prepared and will include practicable means to minimise noise and vibration impacts during construction for the marine infrastructure works, including construction methodology and equipment chosen for the development.

Other Approvals/Licensing

South Australian EPA licence/s will be necessary for the SCY for prescribed activities of Environmental Significance under the EP Act to ensure compliance with environmental regulations and standards.

7.2.9 Nuclear waste/material

Please see Section 7.1 in response to comments raised in relation to this topic.

7.2.10 Radiation Exposure

Please see Section 7.1 in response to comments raised in relation to this topic.

However, in response to submissions that disagreed with statement that limited quantities of low-level radioactive waste would be “similar to hospital waste” and was misleading the public about the known health effects of radiation exposure. It is important to distinguish between informed scientific assessments and public perception when evaluating complex technical matters.

The statement in the EIS that the low-level radioactive waste to be stored at the SCY is “similar to hospital waste” is based on rigorous analysis by professionals with expertise in radiological

science, environmental safety, and health risk assessment. These comparisons are not made lightly, they are grounded in well-established scientific classifications and safety protocols.

The accuracy and credibility of information, particularly on technical issues like radiation exposure, depend on the qualifications and expertise of the source. Radiation protection standards are determined by decades of international research, and the experts contributing to the EIS have drawn upon this collective knowledge.

7.2.11 Risk Levels, Emergency Response and Contingency Plans

Community submissions raised concerns around insufficient risk assessment levels and associated mitigation measures in particular the risk of noise as well as vegetation clearing and the implications for local fauna and bird populations.

While such concerns are understandable, it is important to clarify that these matters have been comprehensively assessed within the EIS, in line with regulatory requirements and industry best practice. These issues are specifically addressed in the following EIS chapters:

- Chapter 8: Noise and Vibration – provides detailed modelling and impact assessment, including for both construction and operational phases.
- Chapter 12: Marine Flora and Fauna – includes discussion of ecological sensitivities and the effects of underwater noise.
- Chapter 13: Terrestrial Flora and Fauna – covers habitat loss, species disturbance, and ecological connectivity.

Each of these chapters outlines the assessments and their justification, supported by field surveys, modelling and expert input. The assessments have identified potential impacts and proposed evidence-based mitigation measures that will be implemented through a series of targeted management plans during both construction and operation. These management plans will detail practical strategies, procedures, and best-practice measures to reduce or avoid adverse impacts. While all feedback is welcome and considered, the EIS process is grounded in technical analysis, and the findings demonstrate that risks have been appropriately assessed and can be effectively managed.

Concerns were raised about the feasibility of a rapid evacuation and a belief that comprehensive contingency planning had been overlooked. These concerns have been considered, and it is important to clarify that emergency and contingency planning have not been ignored, and in fact is addressed in detail throughout the EIS.

For Nuclear-Related Matters, refer to Section 7.1 of the of this Response Document.

For other potential risks, such as fire, flooding, spills, or other emergency scenarios, emergency response and contingency plans are proposed as integral components of both the CEMPs and the OEMPs. These documents will be developed and implemented for all phases of the SCY and will ensure that SCY meet the highest safety standards. Examples of these measures include:

- Emergency Flood Response Plans to maintain safe access and egress in extreme weather events

- Spill response protocols and containment strategies to manage accidental releases of materials
- Fire and safety plans to mitigate risks and ensure swift and coordinated responses if required
- Evacuation procedures and site safety protocols, designed in coordination with emergency services and relevant authorities.

These plans are discussed within the EIS across multiple chapters and embedded within the topic-specific assessments where relevant. They reflect best-practice risk management and align with statutory requirements for emergency planning.

In many cases, public concerns appear to reflect a general fear of worst-case scenarios, often without reference to the actual content of the EIS. While such concerns are taken seriously, the EIS is based on an evidence-based assessment, and emergency planning has been tailored accordingly to the real and plausible risks associated with the SCY within the remit of the State based approvals.

The SCY remains committed to the safety and wellbeing of the local community and will continue to work with relevant authorities and stakeholders to ensure robust, transparent, and adaptive emergency response arrangements are in place throughout the life of the SCY.

Commitment:

See Section 7.2.7 and 7.2.8 for commitments made in respect of Noise and Vibration and Marine Flora and Fauna.

As outlined within Section 13.6.1 of Chapter 13: Terrestrial Flora and Fauna, the Project partners are committed to the following to ensure that effects with respect to terrestrial flora and fauna are controlled.

Construction

A Terrestrial Flora and Fauna Management Plan (TFFMP) will be developed and incorporated into the CEMP for the development. The CEMP will also include:

- Measures to manage construction lighting, and all temporary external lighting will be designed to minimise the risk of light spill outside the area it is desired to illuminate; and particular care will be taken to minimise light spill into surrounding habitat.
- Construction SMP (or equivalent), measures to manage the discharge of site stormwater and /or surface wastewater, into adjacent areas.
- A BMP identifying management of terrestrial flora and fauna pests as required.

Operation

A TFFM will be developed and incorporated into the OEMP for the development. Operational lighting will be directed within the development site limits away from sensitive receptors and will include maintaining the designed features to reduce light spill beyond the areas required to be lit.

A BMP will also be incorporated into the OEMP, identifying management of terrestrial flora and fauna pests as required.

An SMP (or equivalent) documents the design of the development that takes into account climate change and will ensure that peak rates of surface runoff from the development are controlled, that infiltration of runoff is encouraged (where possible and practical) and that low levels of pollution from the development are appropriately managed through the use of settlement basins, filtration areas, interceptors and / or silt traps etc.

7.2.12 Public Transparency

Some submissions expressed concern about the level of national public consultation regarding the broader AUKUS program, whilst others questioned the transparency and accountability of the EIS process itself.

The EIS is being undertaken as part of a State based planning pathway under South Australia's PDI Act. The EIS is not the mechanism for determining the national level consultation process or policy debate around the AUKUS program, nor is it responsible for evaluating the Federal government's approach to public engagement on defence related matters.

What the EIS does do, is provide a comprehensive assessment of the SCY at the State level. The Impact Assessed pathway under the PDI Act represents the highest level of environmental and planning assessment in South Australia, specifically designed to allow for the holistic consideration of projects of significant economic, social or environmental importance to the State. It is a robust and transparent process that includes statutory public consultation periods and opportunities for feedback and input from a broad range of stakeholders.

As outlined in Section 3 of the Response Document, the Proponent has undertaken multiple opportunities for public and stakeholder engagement as part of the EIS process. This demonstrates a clear commitment to transparency, inclusion, and responsiveness to community concerns.

Regarding the concern that the EIS relies on future management plans, approvals, and licences, this is a standard and accepted approach within the EIS framework. It allows for the appropriate and adaptable management of environmental risks and project impacts in circumstances where certain design details may still be evolving or need to be refined during future stages of development. These plans, such as the CEMP and OEMP and EPA Licences, are not optional, they are required commitments that are subject to review, approval, and, where appropriate, enforcement by regulatory authorities.

In response to calls for ongoing consultation, the Proponent acknowledges the value of local knowledge and community insight and is committed to continuing engagement with stakeholders (including First Nations peoples), conservation groups, and the public throughout the SCY's lifecycle.

Finally, regarding nuclear waste management and the disclosure of risk-related information, these are matters governed by Commonwealth legislation and regulatory frameworks and fall outside the scope of this EIS. Refer to Section 7.1 above.

7.2.13 Traffic

Public submissions raised concerns about traffic impacts on the existing road network, particularly during peak periods aligned with workforce shift changes at the existing ONS facility.

The EIS has appropriately identified and assessed these concerns, recognising that traffic impacts during the operational phase of the SCY require careful consideration. The assessment concluded that significant effects on the existing road network may occur, especially when combined with projected population and employment growth on the Lefevre Peninsula.

To address these issues, the Proponent has undertaken updated traffic modelling (see Appendix E), which builds on the original EIS assessment and incorporates a range of potential indicative mitigation measures. This modelling, developed in consultation with the Department for Infrastructure and Transport (DIT), demonstrates that effective interventions can be implemented to manage and reduce impacts on the road network. See Section 8.2.4 of this Response Document for the updated assessment of significance.

Importantly, the construction and operation of the SCY will occur in phases over time. Major increases in operational traffic volumes are not anticipated until the early 2030s through to the late-2030s, providing a window of opportunity for infrastructure and operational planning to respond to future demands.

The Proponent is actively working with DIT and other stakeholders to explore solutions that balance operational needs with community impacts. These potential solutions are likely to include a combination of:

- Staggered workforce scheduling.
- Enhanced public transport services to reduce reliance on private vehicles
- Road infrastructure upgrades to improve capacity and safety
- Off-site parking with shuttle services to ease congestion at peak times

This collaborative and staged approach ensures that traffic impacts are being actively managed, with sufficient time to implement the right mix of strategies and infrastructure solutions.

Commitment:

As outlined within Section 9.4.2 of Chapter 19: Traffic and Transport, the Project partners are committed to the following to ensure that effects with respect to traffic and transport are minimised.

Construction

A Construction Traffic Management Plan (CTMP) will be prepared in consultation with statutory agencies prior to the commencement of construction. The CTMP will set out the strategy and approach to traffic routing and management to minimise disruption effects on the local community and environment.

The CTMP would include details of:

- The routing of construction and delivery vehicles to/from the development site.
- Details of parking and turning areas for construction and delivery vehicles and site personnel.

- Timing of deliveries including the avoidance of traditional AM peak hour (07:00-09:00) and PM peak hour (17:00-18:00).
- Management of abnormal (larger or longer) loads.
- Temporary traffic management / signage.

Operation

As outlined within Chapter 2: Description of Development of the EIS, the design of the SCY and the future submarines is still in progress. As such the final details regarding future worker numbers and construction material qualities are also not yet confirmed. As a result, the EIS was prepared in accordance with functional requirements for similar submarine construction yards using conservative assumptions around vehicle usage.

Consequently, whilst an indicative mitigation scenario traffic modelling exercise has been provided (Appendix E), it is not possible to confirm or commit to a final mitigation strategy for the SCY at this time. As such, further traffic investigations will continue to be progressed as a reserved matter in partnership with DIT and other State and Commonwealth Government's departments to inform the selection of final mitigation measures.

Further traffic investigations will include:

- Ongoing traffic model development and refinement as data is confirmed consistent with that needed for more detailed option assessment and comparison.
- Ongoing refinement of data assumptions for the ONS precinct (e.g. workforce demand, shift times etc) as the parallel process of progressing the site operational planning occurs.
- More detailed modelling and assessment of specific options aimed at short-listing to a small number of viable approaches ahead of progression towards a preferred overall network mitigation approach.

7.2.14 Visual Amenity

Some submissions disagreed with the EIS finding that the SCY would not significantly impact the area's visual amenity.

The EIS has thoroughly assessed potential impacts on landscape and visual amenity during both the construction and operational phases of the SCY. The subject site currently comprises flat, cleared land that has been prepared for industrial use. The site is fenced, not publicly accessible, and situated within an already industrialised environment that includes significant infrastructure such as the existing ONS, commercial port operations, power stations, rail infrastructure, grain silos, and fuel storage facilities.

Given this context, the subject site itself is not considered to have significant characteristics such as natural tranquillity, rarity, or scenic amenity, nor does it play a prominent role in defining the broader community's sense of place.

The EIS acknowledges that some visual impacts will occur, particularly due to the scale of infrastructure required. However, these impacts are not considered significant as the buildings will

be consistent with the scale and function of the existing ONS facility and are in keeping with the subject site's current industrial zoning under the Planning and Design Code.

Whilst changes to visual amenity are acknowledged, they are considered appropriate for the context and not significantly detrimental to the broader visual amenity of the Lefevre Peninsula. The design and scale of the SCY are consistent with the surrounding infrastructure.

7.2.15 Location of the SCY

While the selection of the preferred site for the SCY was determined by the Australian Government. The ASA conducted an in-depth analysis of potential locations to guide the government's decision. As outlined in the Strategic Assessment:

"The Australian Submarine Agency undertook a comprehensive analysis of potential locations to inform a government decision on a suitable site for the nuclear-powered submarine construction yard. The preferred site location is the Strategic Assessment Area located on the Lefevre Peninsula, South Australia."

The subject site on the Lefevre Peninsula was identified as the preferred location due the:

- **Strategic co-location:** The subject site is adjacent to the existing ONS facility, Australia's most advanced shipbuilding precinct, enabling direct access to established infrastructure and a highly skilled workforce.
- **Prepared Industrial Land:** The area selected is land previously prepared for industrial development and made available by the Australian and South Australian Governments, supporting its appropriateness for major infrastructure projects.
- **Existing Capability and Infrastructure:** The existing ONS facility, managed by Proponent, already supports previous and current naval programs, including the Hobart Class Destroyers, Offshore Patrol Vessels, and Hunter Class Frigates, as well as the Collins Class Submarine sustainment activities. These capabilities provide a strong foundation for the AUKUS program.
- **Alignment with Planning Frameworks:** The subject site aligns with key planning instruments, including the State Planning Policies, Greater Adelaide Regional Plan, and the Planning and Design Code.

As a result the preferred site for the SCY offers significant strategic advantages and is well positioned to support the delivery of the AUKUS program and the continued growth of Australia's sovereign shipbuilding capability.

7.2.16 Access to Mutton Cove

The Proponent acknowledges the community concerns raised in relation to changes in public access to Mutton Cove.

This has been considered and addressed in the EIS, which recognises both the existing use of the area and the potential implications of future security requirements. On land, the construction and operation of the SCY are anticipated to result in changes to access and security. Changes limiting the availability for public access to areas that are currently publicly accessible, including Mutton

Cove, Falie Reserve and the Snapper Point carpark should be anticipated with the development of the SCY.

Opportunities for public access, once the SCY is fully operational, are yet to be confirmed, as any access will be subject to security requirements for the SCY and any site licencing requirements under the ARPANSA Act and the incoming Australian Naval Nuclear Power Safety Act 2024.

It is important to note, however, that access to Mutton Cove currently involves only a limited number of recreational users accessing the site by land. There are currently no plans to limit water-based visitors via the Port River to the shoreline or mudflat zones of Mutton Cove.

Commitment

The Proponent acknowledges the importance of continued conservation efforts within Mutton Cove and commits to working collaboratively with relevant agencies and stakeholders to ensure that access for conservation management requirements.

7.2.17 Social Infrastructure and Economics

The Proponent acknowledges the concerns raised by community members regarding the potential impacts on local social infrastructure, liveability, economic activity, and property values on the Lefevre Peninsula.

The EIS has assessed potential social and economic impacts of the SCY, including anticipated population changes and resulting pressure on local services and infrastructure. However, the Proponent does not have control over the provision or planning of social infrastructure such as housing supply, education, health services, or public transport. These remain the responsibility of State and Local Government and are managed through established planning and service delivery frameworks.

In recognition of these broader impacts, the South Australian Government has established the Office for AUKUS to coordinate whole-of-government responses to the AUKUS program. An initiative of this office is the preparation of the Lefevre Peninsula Masterplan, which is anticipated to assess and consider many of the issues raised by the community.

The Masterplan, being developed in collaboration with the ASA, the Proponent, State and Local Government agencies and stakeholders, will provide a structured approach to consider and manage future growth on the Peninsula and respond to needs identified by key stakeholders, including the Proponent. It will:

- Guide future investment in housing, transport, and public infrastructure,
- Ensure appropriate planning for education, health, and community services,
- Support ongoing industrial activity while protecting and enhancing local liveability,
- Inform updates to the Greater Adelaide Regional Plan, ensuring alignment with the needs of both the SCY and the broader community.

The overarching goal of the Masterplan is to ensure that future growth is sustainable and supports vibrant, liveable, and economically resilient communities. Work on the plan is underway, with delivery and implementation from 2025 onwards.

Commitment

The Project partners are committed to working closely with all levels of government and stakeholders to support coordinated planning and ensure that the SCY contributes positively to the region's social and economic future.

7.2.18 Increased Military Target Risk

Concerns have been raised regarding the perception that the development of the SCY may increase the likelihood of the Northern Lefevre Peninsula becoming a military target. The Proponent acknowledges these perceptions but disagrees with the suggestion that the SCY significantly alters the strategic risk profile of the area.

The existing ONS is already Australia's most advanced and strategically significant naval shipbuilding precinct. The existing facilities at ONS support several major defence programs, including:

- The Hobart Class Air Warfare Destroyers,
- The Offshore Patrol Vessels,
- The Hunter Class Frigates, and
- The full-cycle docking and sustainment of Collins Class Submarines.

These are critical capabilities within the Australian Defence Force's existing naval operations and represent significant defence infrastructure. Given the scale and strategic importance of these existing programs, the presence of the SCY is not considered to materially increase the Northern Lefevre Peninsula's profile as a potential military target. The introduction of nuclear propulsion does not, in and of itself, represent a fundamental shift in risk either. It is not the presence of nuclear propulsion that elevates strategic value, but considered to be a function and integration of these assets within national defence, which is already well established on the Northern Lefevre Peninsula.

The addition of the SCY is a continuation and expansion of Australia's shipbuilding capability that currently exists at the ONS and is not considered to be a significant escalation of risk for the Northern Lefevre Peninsula.

7.3 Key Stakeholder Feedback

The Proponent acknowledges the detailed feedback received from stakeholders and government agencies. These contributions have been considered and have informed ongoing work.

Given the technical and specific nature of many of these submissions, we have provided detailed responses to each point raised within Appendix D of this Response Document. This allows for a clear and transparent account of how stakeholder input has been addressed.

This section of the Response Document provides a response to the main matters raised by the stakeholders, drawing on the responses provided within Appendix D.

7.3.1 Aboriginal Affairs and Reconciliation

The Proponent acknowledges AAR confirmation that the risk of discovering Aboriginal heritage during the development is low, as stated in the EIS, and that the use of CEMPs is an appropriate mechanism for managing any unexpected discoveries during construction. The Proponent will ensure that the final CEMPs for the project includes clear procedures for the identification, protection and management of any Aboriginal heritage finds in accordance with relevant legislation.

In response to AAR's recommendation for ongoing engagement with Aboriginal stakeholders, the SCY commits to preparing an Aboriginal Engagement Plan (AEP) to guide communication and information sharing during for the SCY. The AEP will identify relevant Aboriginal stakeholders, outline engagement protocols, and provide mechanisms for incorporating stakeholder feedback where appropriate, ensuring respectful and meaningful engagement for the SCY.

Accordingly, the Project partners support a condition requiring the preparation and implementation of an AEP post-approval to ensure continued consultation with Aboriginal stakeholders throughout the final design, and delivery of the project.

7.3.2 Department for Environment and Water

In response to feedback received from the DEW on the EIS, five key themes emerged through the consultation.

One of the primary themes raised by DEW was the potential impact of construction noise and vibration on marine mammals, particularly the resident dolphins of the ADS. DEW emphasised the need for stronger mitigation measures, including prioritising the use of bubble curtains during piling. In response, the Proponent clarified that while bubble curtains were not modelled in the EIS (to provide a conservative, worst-case assessment), their application, where demonstrated to be effective, will be re-examined during final construction planning and embedded in the CEMPs and Dredge Management Plans were identified as being effective.

Another theme was the assessment of cumulative impacts from dredging projects in the Port River. DEW expressed concern that multiple dredging activities could compound environmental effects on the local dolphin population and marine habitats. The Proponent explained that dredging associated with Area 3 is not scheduled to commence for approximately ten years, well after the completion of other known projects such as the Venice Energy dredging. As such, direct cumulative impacts are not anticipated. Regardless, a commitment was made that further, detailed environmental assessments would be undertaken at the time dredging approvals are sought, ensuring the most current scientific data and regulatory requirements are incorporated.

DEW also requested clarity on the potential impact of the SCY on native marine vegetation, including seagrass beds within the Port River. To which, clarification was provided that the EIS provides a sufficient 'worst-case' assessment of potential impacts to native marine vegetation based on the available information for the current level of design, noting that only small, sparse patches of seagrass are present within Area 3. Additionally, given that detailed design has not yet

been finalised and seagrass coverage may naturally change over time, the EIS defers the preparation of the Native Vegetation Clearance Data Report (NVCDR) closer to construction once the final design is known and the precise area of seagrass to be removed can be confirmed. This requirement will be secured by a condition of development approval. This ensures the final mitigation strategies will be tailored to current conditions, avoiding unnecessary duplication and outdated data.

Flood hazard risk management formed another theme of DEW's feedback. Concerns were raised regarding the adequacy of flood modelling, particularly in the context of future sea level rise projections to the year 2100 and beyond. In response, it was confirmed that finished floor levels for all development areas are designed to significantly exceed the Coast Protection Board minimum recommended elevations. The SCY design will continue to evolve with further refinement of flood modelling, ensuring consistency with the latest coastal hazard guidance and site licencing requirements, and maintaining a level of resilience against extreme weather events.

Finally, DEW highlighted the importance of biosecurity and stormwater management, particularly in protecting the sensitive environment of the ADS. The Proponent has advised that biofouling management protocols consistent with existing Royal Australian Navy practices will be implemented and that the SCY's stormwater management plan will incorporate water-sensitive urban design principles and will be refined alongside final designs to ensure runoff quality and volumes are carefully managed to minimise the potential impact to the marine environment.

7.3.3 Department for Health and Wellbeing

The Proponent acknowledges the DHWs focus on key public health aspects of the SCY, including air quality, dust management, water quality, and mosquito control.

The Air Quality Assessment included within the EIS have been undertaken following the current South Australian regulatory standards, specifically the EPA's Air Quality EPP 2016. While the assessments indicate low to negligible health risks, the Proponent recognises the value of monitoring NO₂ levels, particularly given the existing asthma prevalence in North Haven, and will incorporate strategies into future management plans to address short-term dust events, public health communication, and ongoing air quality monitoring.

Further, the Proponent has considered potential water contamination impacts and confirms that mitigation measures will manage water discharge to protect recreational water uses. Integrated mosquito management practices, where identified as being required will also be applied at the SCY.

Any additional assessments or updates to management plans, including air quality measures, will be aligned with applicable standards and guidelines current at the time of preparation.

Collaboration with relevant agencies will continue as part of the post-approval development of management plans and operational protocols.

7.3.4 Department for Infrastructure and Transport

In response to feedback from DIT regarding the EIS, the Proponent undertook a further indicative mitigation scenario traffic modelling exercise to assess the range of potential mitigation measures outlined in Section 9.7 of Chapter 9: Traffic and Transport of the EIS. The aim of this modelling was to evaluate how these measures could reduce traffic impacts associated with the SCY and

minimise effects on the road network. The findings of the indicative mitigation scenario is discussed in further detail below within Section 8.2.4 and Appendix E.

The EIS has scoped out impacts on shipping and vessel access, except for launching and commissioning. These limited occurrences, similar to those of the existing ONS will be low in frequency and coordinated with existing Flinders Ports Corporation operations to avoid disruption. The SCY will not generate high vessel traffic, as there will be no docking of vessels from overseas or interstate at the site. This is not feasible for two key reasons: during construction, no docking facilities will be available, as the development itself will not yet exist and during operation, the development is not designed to accommodate container ships or routinely facilitate the direct delivery of quantities of materials by sea, as these facilities already exist at nearby Outer Harbor.

Hazardous substance management, including spill prevention and response, has been addressed through existing EPA regulations and considered in several EIS chapters. Dredging activities have been planned within existing approved land titles, with any additional approvals to be managed through the EPA licensing process as required. The design for the marine infrastructure works are proposed within ANI-owned land parcels, and if design changes require works outside these areas, the necessary land tenure approvals will be sought.

Opportunities to minimise potential traffic noise impacts will be considered during the development of traffic and transport options in accordance with the South Australian DIT Road Traffic Noise Guidelines. Stormwater management for the SCY and road network will be confirmed through detailed design.

Security planning for the proposed SCY and existing ONS facility is ongoing, with no significant impacts on transport networks identified to date, and future arrangements will continue to involve relevant agencies to ensure broader network considerations are addressed.

7.3.5 Department of Premier and Cabinet

The Proponent acknowledges the DPCs support for the SCY and notes that no specific comments were provided on the EIS.

7.3.6 Department of Primary Industries and Regions

While PIRSA suggested consideration for broader consideration of pest transfer risks across the State, the EIS acknowledges broader biosecurity considerations and outlines the comprehensive management measures that will be implemented through the Biosecurity Management Plans (BMPs) to prevent the introduction and spread of marine and terrestrial pests. These measures ensure that construction and operational activities, including submarine vessel movements, do not contribute to the transport of pests or diseases to other locations. Given these plans that document the required controls, the risks of exotic species, pests or disease transfer have been appropriately addressed and mitigated within the EIS.

Additionally, whilst non-project vessel traffic within the Port River is high, the submarines will be constructed on the subject site and launched directly into the Port River. The SCY will not generate high vessel traffic, as there will be no docking of vessels from overseas or interstate at the subject site. This is not feasible for two key reasons: during construction, no docking facilities will be available, as the development itself will not yet exist and during operation, the development is not

designed to accommodate container ships or facilitate the direct delivery of quantities of materials by sea.

While some vessels could potentially transport goods and materials for the development to nearby Outer Harbor, these vessels will not be owned or operated by the Proponent, nor will they dock at the subject site or the existing ONS facility. All operational maritime vessel movements related to material deliveries will be coordinated with the Port Operator (Flinders Ports Corporation), following standard practices for importing materials into South Australia and in full compliance with existing regulatory biosecurity requirements.

Given these considerations, the potential for exotic species or pests to spread from the subject site to other locations throughout the State (both marine and terrestrial) is considered to have been addressed in the EIS, with further detail to be provided in the future BMPs which would be ensured by condition on the development approval. Additionally, any biosecurity risks associated with general imports into the Port are managed under existing regulatory requirements and fall under established State and national biosecurity regulations.

While PIRSA raised concerns about the perceived short-term classification of some risks, the EIS justifies this based on established impact assessment methodology and site conditions. All relevant biosecurity risks will be monitored and managed through enforceable conditions tied to the planning approval, with sufficient consultation time allocated to ensure agency input prior to operations commencing.

7.3.7 Environment Protection Authority

The EPA sought clarification on matters relating to air quality, noise, and site contamination during its review of the EIS. In response, additional information was provided to address the EPA's queries and ensure that all technical matters were sufficiently considered. Following review of the additional information, the EPA confirmed that it is satisfied with the assessment and proposed management measures for these topics.

The matter of Propulsion Systems and the storage of low-level radioactive waste within the SCY site has been discussed with the EPA in more detail. As outlined in Section 7.1.1 above, it was clarified that a State based EIS cannot and does not approve or license defence related nuclear activities. Nuclear components of the SCY project, including propulsion systems and the storage of low-level radioactive waste, are subject to Commonwealth regulation under the ARPANS Act and the forthcoming Australian Naval Nuclear Power Safety Act 2024. This regulation covers transport, delivery, storage, commissioning, testing, safety systems, as well as radioactive waste management. The EPA has accepted that the Proponent has provided what information on the matter is can and confirmed that the EIS sufficiently addresses the questions raised in the Assessment Requirements based on the information currently available.

The EPA also confirmed that, in relation to the proposed dredging activities required for the construction of the SCY, a dredging licence will be secured through a reserved matter attached to the development approval. It was discussed and agreed during workshop meetings that, due to the current level of design detail, it is not currently possible to provide the detailed modelling typically required for a dredging licence application within the EIS at this time.

Additionally, the EPA has confirmed that several licences, as required under the *Environment Protection Act 1993*, will be applied for throughout the life of the SCY. These licences will be secured through conditions attached to the development approval, ensuring that all necessary environmental protections and regulatory requirements are met during both the construction and operational phases.

7.3.8 Minister responsible for the Adelaide Dolphin Sanctuary (ADS)

The Proponent acknowledges the Minister's comments regarding the ADS, noting that the response was informed by the feedback provided by the DEW and the NVC.

In response to the comments raised by both DEW and NVC, the Proponent has reviewed and responded to the concerns identified. Many of the matters raised by DEW and NVC have already been addressed in the EIS, with the Proponent providing further detailed clarifications to ensure all relevant environmental and ecological considerations are fully addressed. The Proponent is confident that, through these responses, all concerns raised by DEW, NVC, and the Minister have been effectively addressed.

The Project partners are committed to ensuring that the SCY meets the required environmental standards, and that the protection of the ADS is a priority throughout the design, construction and operation of the SCY.

7.3.9 Port Adelaide Enfield Council (PAE)

The majority of the comments raised by the PAE are considered to have been sufficiently addressed within the EIS through detailed assessment, identification of management strategies, and mitigation measures.

Where further clarification or elaboration has been identified as being required, this has been provided within this Response Document, within Section 7, to common topics and concerns. Accordingly, the following response only addresses those specific matters raised by PAE that were not already addressed within the EIS or clarified elsewhere in this Response Document.

Lefevre Peninsula Masterplan

The EIS recognises the Lefevre Peninsula Masterplan as part of the broader strategic planning context but does not rely on its finalisation for the assessment or approval of the SCY development. The EIS has been prepared in accordance with relevant legislative and policy requirements, with all technical assessments and impact mitigation strategies developed independently of the Lefevre Peninsula Masterplan.

Where reference has been made to the Lefevre Peninsula Masterplan, specifically in relation to upgrades to State managed transport infrastructure, this reflects the Proponent's acknowledgement that it does not have the authority to implement changes to infrastructure outside the project area. Instead, the Proponent has committed to continue to work in partnership with the State Government to address the potential traffic impacts identified in the EIS. This includes ongoing engagement with relevant State agencies to ensure appropriate mitigation measures are implemented as the development progresses.

Whilst the Lefevre Peninsula Masterplan is relevant to the broader planning context, and the area around the SCY, the EIS does not depend on its finalisation and can proceed through the approval process independently, supported by the commitments made within the EIS and ongoing coordination with local and State government stakeholders.

7.3.10 South Australian Metropolitan Fire Service

The Proponent acknowledges the important role of the SAMFS in the SCY and is committed to early and ongoing engagement, particularly with the Built Environs Department.

The Proponent will ensure the SCY works closely with SAMFS throughout the design progression for dangerous goods and hazardous chemical storage and will seek their input once quantities are determined. Regular engagement with local crews, hazmat staff, and routine emergency response exercises will be undertaken and incorporated into the CEMPS and OEMPs. The SCY will ensure it complies with the SAMFS Guideline for an Emergency Services Information Package and involve SAMFS in reviewing emergency plans and ESIPs.

7.3.11 South Australian Police

The Proponent acknowledges the important role that SAPOL will have throughout the lifecycle of the SCY.

Matters relating to radiation will be addressed under Commonwealth legislation, including the ARPANS Act and ARPANSA licensing requirements. Air quality monitoring specific to dangerous goods transport is not considered to be required, with transport impacts addressed within the traffic assessment and regulated under existing statutory requirements.

Traffic assessments have been undertaken in consultation with the DIT, with key freight routes considered, although alternate routing in the event of accidents and vehicle technology risks fall outside the EIS scope.

7.3.12 Native Vegetation Council

The Proponent acknowledges the NVC's comments and confirms that the EIS provides a sufficient assessment of potential impacts to native vegetation, based on the available information for the current level of design.

The EIS includes a detailed, 'worst-case' assessment of impacts on native vegetation, particularly seagrass within Area 3, noting that only small, sparse patches of seagrass are present. The requested NVCDR will be prepared by an Accredited Consultant once the final design is confirmed and prior to any clearance, ensuring compliance with the *Native Vegetation Act 1991*. This requirement will be secured by a condition on the development approval.

The EIS demonstrates that the design seeks to minimise impacts, with marine infrastructure following the existing coastline and avoiding significant seagrass areas where possible. Should clearance be required, the Proponent will ensure a NVCDR is prepared that addresses the mitigation hierarchy, and apply for a Native Vegetation Clearance Permit (NVCP) as required.

The EIS also assesses potential environmental impacts, including turbidity, risk of algal blooms, direct seagrass loss, and effects on marine life. These impacts are expected to be minor to

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negligible, short-term, and reversible, and will be managed through appropriate mitigation and management measures secured through conditions on the development approval.

8. Conclusion

8.1 Summary

The Proponent would like to thank all stakeholders, agencies, and community members who took the time to review the EIS and provide feedback.

The Proponent has reviewed all submissions received during the engagement process and acknowledges the range of views and concerns raised by stakeholders and community members. In response, the Proponent has carefully considered each topic and provided detailed responses, clarifications, or explained commitments where appropriate. The following topics/matters were raised in submissions by the public and have been responded to by the Proponent:

- Air quality
- Biosecurity
- Community well-being
- Contamination
- First Nations Engagement/Rights
- Flooding/Climate Change
- Marine Flora and Fauna
- National Security
- Noise
- Nuclear Waste/Material
- Radiation Exposure
- Risk Levels, Emergency Response and Contingency Plans
- Public Transparency
- Traffic
- Visual Amenity
- Location of the SCY
- Access to Mutton Cove
- Social Infrastructure and Economics
- Increased Military Target Risk

It is important to note that some submissions included some topics that were outside the scope of the EIS. In particular:

- Nuclear-Related Matters (Section 7.1.1)
- Capital Dredging (Section 7.1.2)
- National Security, Foreign Policy and Global Politics (Section 7.1.3)
- Ethics and Cost to Government (Section 7.1.3)
- Limited Access to Project Information (Section 7.1.3)
- End of Asset Life Considerations (Section 7.1.3)

The Proponent has provided responses and clarifications explaining why these matters are not addressed within the EIS. Where appropriate, the Proponent has outlined how these topics will be considered through other relevant assessment or approval processes.

8.1.1 Amendments to the EIS

All comments received have been carefully considered, however no amendments to the findings of the significance of effects assessment contained within the EIS have been required, nor has the SCY development required any amendments as a result of the feedback.

8.1.2 Additional Information

Additional information has been provided in this Response Document, see Section 8.2 below, to address specific queries and provide further detail where appropriate in response to government agencies.

8.2 Additional Information Provided

The following additional information has been provided in response to feedback received from the EPA and DIT.

8.2.1 Air Quality

Table 3-2 of Appendix 1.1: Air Quality Assessment was updated to include the following criteria as the request of the EPA:

- 12-month ground-level concentration (GLC) criterion for benzene ($10 \mu\text{g}/\text{m}^3$)
- 12-month GLC criterion for benzo(a)pyrene (0.3 nanograms/ m^3) and $0.8 \mu\text{g}/\text{m}^3$ as the 3-minute average GLC.

In addition, Section 6.3 and relevant Appendices of Appendix 1.1 have been updated to include a comparison of the predicted concentrations of these pollutants with the annual average criteria. An additional table demonstrating that the 12 month GLC of these pollutants have been met have been incorporated into Appendix 1.1. The updated Appendix 1.1: Air Quality Assessment is provided within Appendix E of this Response Document.

The proposed updates to Appendix 1.1 of the EIS, have been reviewed in the context of the significance assessment provided in Chapter 7: Air Quality of the EIS. No updates to Chapter 7: Air Quality are required as the additional information provided within Appendix 1.1 remain consistent with the previous assessment (i.e., no exceedances of the relevant pollutant criteria under the Environment Protection (Air Quality) Policy 2016). Consequently, there is no change to the Magnitude of Impact or Significance of Effect reported within Chapter 7: Air Quality.

8.2.2 Noise

Appendix 1.2: Noise and Vibration Assessment was updated at the request of the EPA to include a new section under Section 6.3: Predicted Noise Levels to address the predicted L_{max} at the nearest affected receivers, which also includes a table of results as presented for the predicted L_{eq} . The updated Appendix 1.2: Noise and Vibration Assessment is provided within Appendix E of this Response Document.

The updates to the Appendix 1.2 of the EIS, have been reviewed in the context of the significance assessment provided in Chapter 8: Noise and Vibration of the EIS. A minor update to Table 8.11:

Predicted Noise Levels in Chapter 8: Noise and Vibration is required to include the predicted L_{max} levels provided within the updated Appendix 1.2. This is provided as Table 8.1 below. However, as the relevant Noise EPP criteria for L_{max} are met, no change to the Magnitude of Impact or Significance of Effect is required within Chapter 8: Noise and Vibration of the EIS.

Table 8.1: Predicted Leq and Lmax noise levels during operation

Prediction location	Relevant Criteria Leq dB(A) / Lmax dB(A)	Predicted noise level Leq dB(A) / Lmax dB(A)	Below Noise EPP criteria
Daytime (L_{eq})			
Closest Residential Receptor	52	43	Yes
Nighttime (L_{eq})			
Closest Residential Receptor	45	44	Yes
Nighttime (L_{max})			
Closest Residential Receptor	60	49	Yes

8.2.3 Contamination

Since the release of the EIS for consultation, the Proponent undertook further site investigations of the subject site to address known data gaps. Two addendums, below, to the Site Contamination Assessment, included as Appendix A of Appendix 1.14: Physical Environment, were completed and provided to the EPA. These addendums are provided within Appendix E of this Response Document.

- Addendum to Site Contamination Assessment.
- Hazardous Ground Gas (HGG) Assessment for Area 1 and Area 2.

As a result, the only remaining site investigations to be completed for the subject site is in relation the HGG assessment for Area 3. This assessment is scheduled for completion in 2025, following use and decommissioning of the dredge ponds (scheduled at the end of April 2025), as raised groundwater levels at the time of assessment prevented its previous completion alongside Areas 1 and 2. However, given the findings of the HGG Assessment for Areas 1 and 2, it is not anticipated that the results for Area 3 will differ significantly. Once completed, the HGG Assessment for Area 3 has been completed, the report will be provided to the EPA.

These addendums to the Site Contamination Assessment were reviewed in the context of the significance assessment provided in Chapter 19: Contamination of the EIS. No updates to Chapter 19: Contamination are required, as the findings of these reports do not alter the previously assessed Magnitude of Impact or Significance of Effect within Chapter 19: Contamination.

8.2.4 Traffic and Transport

In response to feedback from DIT on the EIS, the Proponent undertook a further indicative mitigation scenario traffic modelling exercise to assess a range of potential mitigation measures outlined in Section 9.7 of Chapter 9: Traffic and Transport of the EIS. The findings of the indicative mitigation scenario (the 'Revised Traffic Model') are included within Appendix E of this Response Document, and an assessment of significance in accordance with the EIA methodology outlined in Chapter 6: Impact Assessment Methodology of the EIS is provided below against the road design capacity for road receptors.

Additionally, the assessment of significance has been supplemented with a review of projected travel times for workers travelling to / from the existing ONS and future SCY (hereafter referred to as the Future ANI Precinct). The comparison of the travel times allows an additional level of assessment in understanding how potential mitigation measures could improve the performance of the road network and reduce impacts on other road users.

Modelling Approach

The initial study area proposed for the transport model, as outlined with Chapter 9: Traffic and Transport of the EIS (the 'EIS Traffic Model'), was reviewed and deemed suitable by DIT. However, through subsequent discussions during the consultation period for the EIS, the transport model was updated to align with a revised methodology that employed alternative pathing techniques. This updated approach was designed to better reflect the uncertainty associated with congestion observed in the EIS Traffic Model and provided a broader range of results for analysis for DIT.

Details of the Revised Traffic Model methodology are provided in Section 2.3 of Appendix E. However, one of the key changes to the Revised Traffic Model was to the model time periods assessed. The EIS Traffic Model time periods were:

- 7am to 9am; and
- 4pm to 6pm.

The Revised Traffic Model time periods are:

- 6am to 10am; and
- 3pm to 7pm.

The rationale for including an additional hour either side of the originally modelled time periods are:

- 6am-7am is the first hour where traffic from the Future ANI Precinct is expected to impact the network;
- 9am-10am does not include any demand from the Future ANI Precinct, but enables an understanding of how long it would take for all employees to reach work;
- 3pm-4pm is the first major release of vehicles from the Future ANI Precinct due to shift changes, and coincides with the highest volume in an hour (i.e., afternoon peak) across the modelled area; and

- 6pm-7pm covers the full release of traffic and provides a complete understanding of how easily traffic will be able to exit the Future ANI Precinct in the evening.

Assumptions and Limitations (i.e. Uncertainties)

Updated assumptions and limitations have been applied to the Revised Traffic Model within Section 2.1 of Appendix E. Notable assumptions from Section 2.1 are provided below:

- The Revised Traffic Model assumes the Future ANI Precinct demand is spread across morning shifts starting between 6am and 9am and departing between 2pm and 7pm. Afternoon shifts are also included within the modelling where it accounts for workers arriving between 1pm and 4pm and departing between 11pm and 1am.
- An assumption that every worker that uses private vehicles will drive i.e. a vehicle occupancy of 1 for vehicles carrying workers is applied. This is considered to be a conservative assumption.

Baseline Conditions and Sensitive Receptors

The following existing road receptors have been assessed within the Revised Traffic Model to provide an updated assessment of effects for the users of the existing road network. The location of the road receptors is shown in Figure 8.1.

- Victoria Road (A16) - between Osborne Road and Veitch Road (Victoria 1).
- Victoria Road (A16) - north of Wills Street (Victoria 2).
- Port River Expressway Bridge (A9).
- Francis Street (PRExy) (A9) – east of Perkins Drive (Port River Expressway 1).
- Port River Expressway (A9) – between Hanson and Eastern Parade Interchanges (Port River Expressway 2).
- Lady Gowrie Drive - north of Osborne Road
- Military Road - south of Strathfield Terrace
- Semaphore Road - west of Nelson Road
- St Vincent Street - west of Commercial Road

Note that the Revised Traffic Model retains the following road receptors from the EIS Traffic Model:

- Victoria 1
- Victoria 2
- Port River Expressway Bridge
- Port River Expressway 1
- Semaphore Road

Figure 8.1: Existing traffic volumes (2021 Baseline Conditions) show the current vehicles per hour across nine locations during both the AM and PM period.

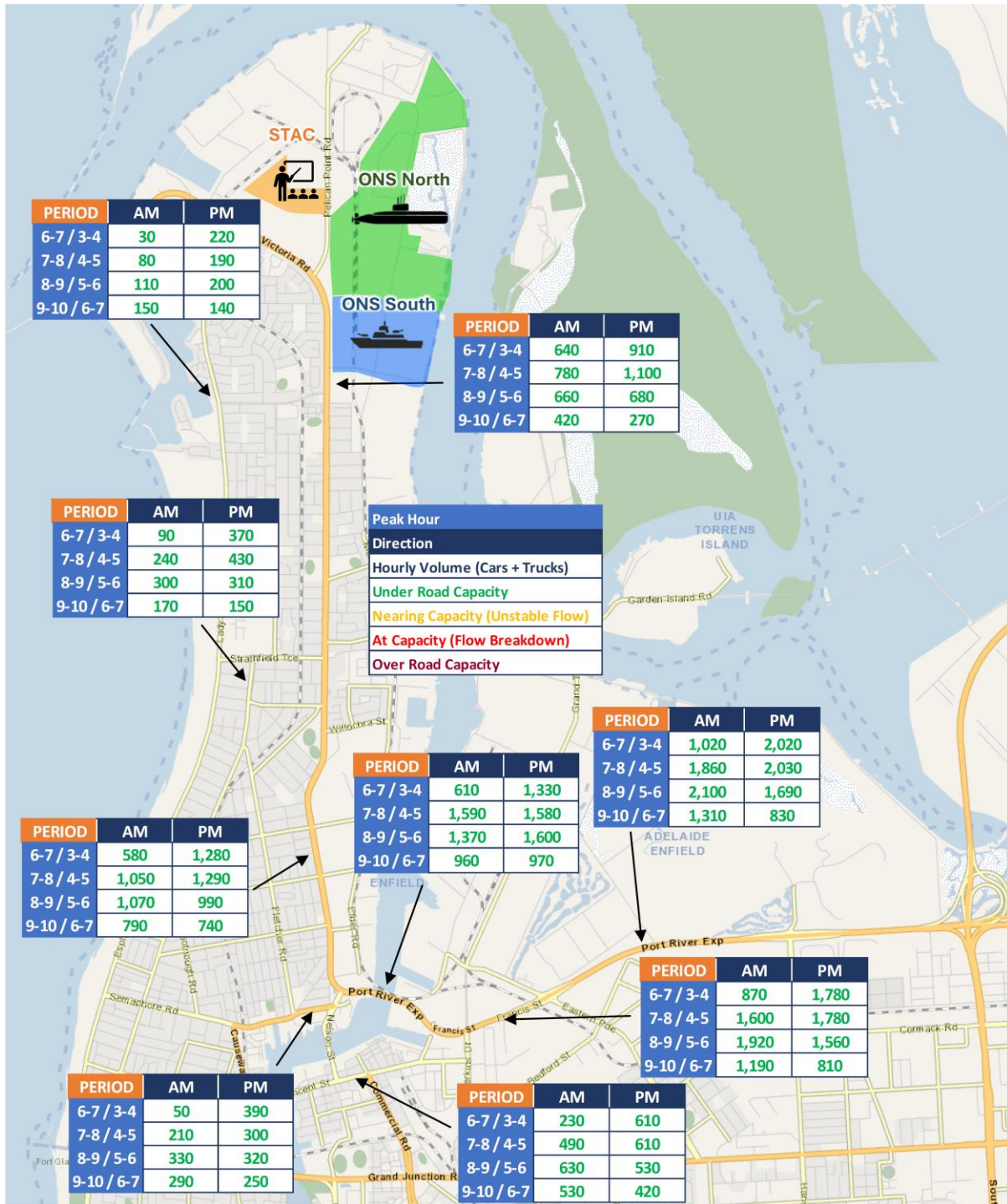


Table 8.2 below provides a summary of the existing traffic peak volumes between 6am and 10am and 3pm to 7pm for the above receptors as shown within Figure 8.1.

Table 8.2: Summary of existing traffic volumes between 6am to 10am (AM) and 3pm to 7pm (PM)

Receptor	Existing traffic movements per hour 6am to 10am (AM)	Existing traffic movements per hour 3pm to 7pm (PM)
Victoria 1	640/780/660/420	910/1100/680/270
Victoria 2	580/1050/1070/790	1280/1290/990/740
Port River Expressway Bridge	610/1590/1370/960	1330/1580/1600/970
Port River Expressway 1	870/1600/1920/1190	1780/1780/1560/810
Port River Expressway 2	1020/1860/2100/1310	2020/2030/1690/830
Lady Gowrie Drive	30/80/110/150	220/190/200/140
Military Road	90/240/300/170	370/430/310/150
Semaphore Road	50/210/330/290	390/300/320/250
St Vincent Street	230/490/630/530	610/610/530/420

Table 8.3 below provides the sensitivity of the road network receptors based on the lowest and highest existing traffic movement figures provided within Table 8.2 for the AM and PM, compared against the design capacity range of the road to determine the sensitivity. This provides a sensitivity range for each road receptor.

Table 8.3: Summary of for Receptor Sensitivity

Receptor	Lowest/ Highest existing traffic movement (AM)	Lowest/ Highest existing traffic movement (PM)	Design Capacity Range	% of the modelled design capacity range used AM*	% of the modelled design capacity range used PM*	Sensitivity AM/PM**
Victoria 1	420/780	270/1100	2,500 to 2,800	17% to 31%	11% to 44%	Very Low to Low (AM/PM)
Victoria 2	580/1070	740/1290	2,500 to 2,800	23% to 43%	30% to 52%	Very Low to Low (AM) Low to Medium (PM)

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Receptor	Lowest/ Highest existing traffic movement (AM)	Lowest/ Highest existing traffic movement (PM)	Design Capacity Range	% of the modelled design capacity range used AM*	% of the modelled design capacity range used PM*	Sensitivity AM/PM**
Port River Expressway Bridge	610/1590	970/1600	2,700 to 3,000	23% to 59%	36% to 59%	Very Low to Medium (AM) Low to Medium (PM)
Port River Expressway 1	870/1920	810/1780	2,700 to 3,000	32% to 71%	30% to 66%	Low to Medium (AM/PM)
Port River Expressway 2	1020/2100	830/2030	3,600 to 4,000	28% to 58%	23% to 56%	Low to Medium (AM) Very Low to Medium (PM)
Lady Gowrie Drive	20/150	140/200	1,050 to 1,150	2% to 14%	13% to 19%	Very Low (AM/PM)
Military Road	90/300	150/430	1,050 to 1,150	9% to 29%	14% to 41%	Very Low to Low (AM/PM)
Semaphore Road	50/330	250/390	2,500 to 2,800	2% to 13%	10% to 16%	Very Low (AM/PM)
St Vincent Street	230/630	420/610	950 to 1,050	24% to 66%	44% to 64%	Very Low to Medium (AM) Low to Medium (PM)

*Calculated against lowest number of the design capacity range.

** Descriptors for Receptor Sensitivity is provided within Table 9.2 of Chapter 9: Traffic and Transport of the EIS.

Assessment of Effects - 2041 Do Nothing Scenario

The 2041 modelling for the Do Nothing Scenario (i.e., no implementation of mitigation measures) within the Revised Traffic Model reconfirms that there is potential for development traffic demand to exceed the overall design capacity on certain roads within the existing road network (Figure 8.2). This will result in congestion / delays to the existing network. The magnitude of impact to receptors based on the modelled demand is provided within Table 8.4.

Figure 8.2: 2041 Do Nothing Scenario future traffic volumes show the projected vehicles per hour across nine locations during both the AM and PM period.

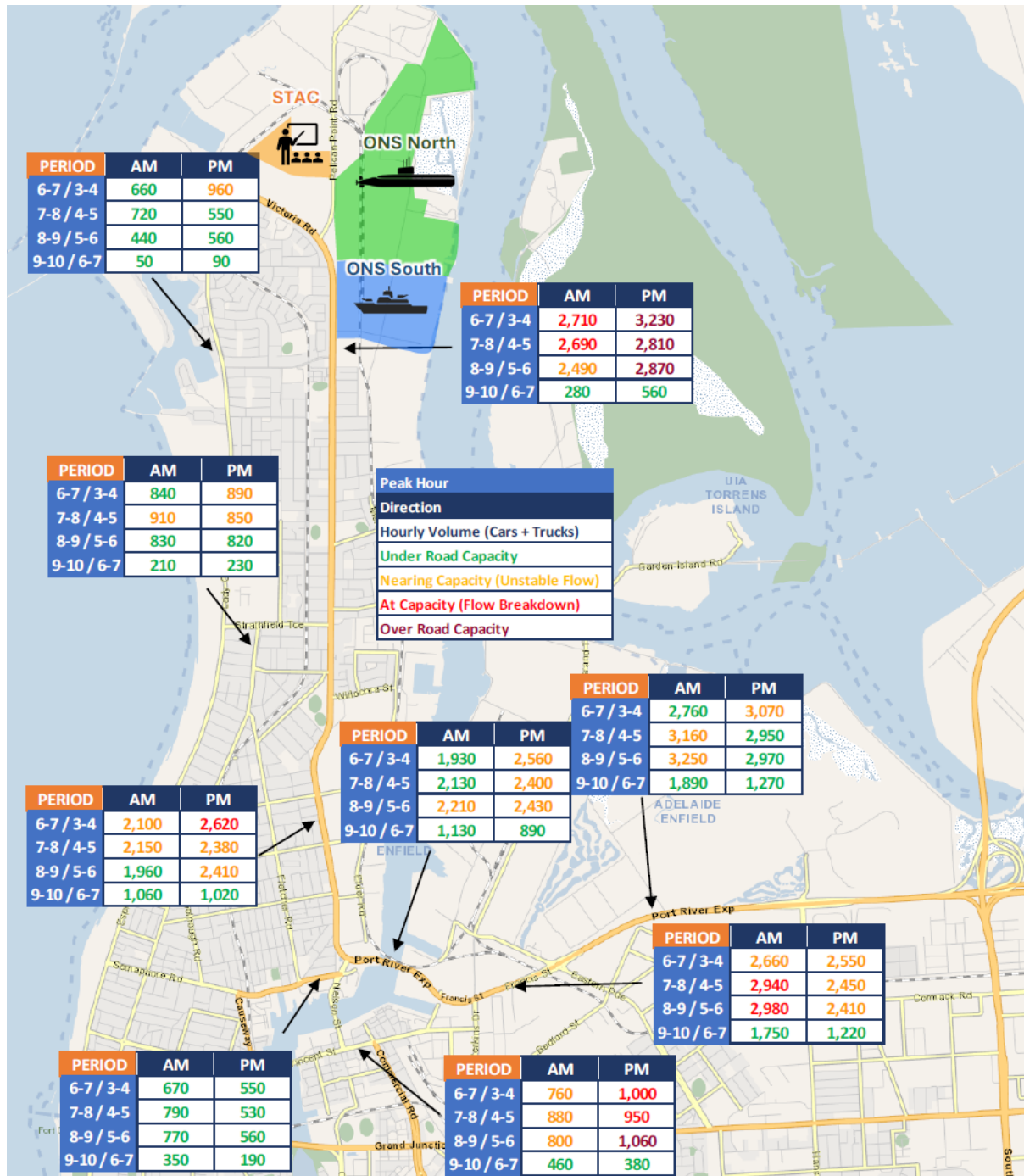


Table 8.4: Summary of Do Nothing Scenario impact magnitude for volumes

Receptor	2041 modelled development traffic movement (AM) *	2041 modelled development traffic movement (PM) *	Design Capacity Range	Predicted traffic demand as % of the modelled design capacity range (AM) **	Predicted traffic demand as % of the modelled design capacity range (PM) **	Impact Magnitude AM/PM***
Victoria 1	2710	3230	2,500 to 2,800	97%	115%	Low (AM) Medium (PM)
Victoria 2	2150	2620	2,500 to 2,800	77%	94%	Very Low (AM) Low (PM)
Port River Expressway Bridge	2210	2560	2,700 to 3,000	74%	85%	Very Low (AM/PM)
Port River Expressway 1	2980	2550	2,700 to 3,000	99%	85%	Low (AM) Very Low (PM)
Port River Expressway 2	3250	3070	3,600 to 4,000	81%	77%	Very Low (AM/PM)
Lady Gowrie Drive	720	960	1,050 to 1,150	63%	83%	Very Low (AM/PM)
Military Road	910	890	1,050 to 1,150	79%	77%	Very Low (AM/PM)
Semaphore Road	790	560	2,500 to 2,800	28%	20%	Very Low (AM/PM)

Receptor	2041 modelled development traffic movement (AM) *	2041 modelled development traffic movement (PM) *	Design Capacity Range	Predicted traffic demand as % of the modelled design capacity range (AM) **	Predicted traffic demand as % of the modelled design capacity range (PM) **	Impact Magnitude AM/PM***
St Vincent Street	880	1060	950 to 1,050	84%	101%	Very Low (AM) Medium (PM)

*Highest number used to determine impact magnitude

**Calculated against highest number of the design capacity range.

*** Descriptors for Magnitude of Impact is provided within Table 9.3 of Chapter 9: Traffic and Transport

The significance of effects for the 2041 Do Nothing Scenario for the existing road receptors is provided within Table 8.5.

Table 8.5: Summary of significance of effect for Do Nothing Scenario

Receptor	Sensitivity	Impact Magnitude	Significance of Effect
AM Period			
Victoria 1	Very Low to Low	Low	Negligible
Victoria 2	Very Low to Low	Very Low	Negligible
Port River Expressway Bridge	Very Low to Medium	Very Low	Negligible
Port River Expressway 1	Low to Medium	Low	Negligible to Minor Adverse
Port River Expressway 2	Low to Medium	Very Low	Negligible
Lady Gowrie Drive	Very Low	Very Low	Negligible

Receptor	Sensitivity	Impact Magnitude	Significance of Effect
Military Road	Very Low to Low	Very Low	Negligible
Semaphore Road	Very Low	Very Low	Negligible
St Vincent Street	Very Low to Medium	Very Low	Negligible
PM Period			
Victoria 1	Very Low to Low	Medium	Negligible to Minor Adverse
Victoria 2	Low to Medium	Low	Negligible to Minor Adverse
Port River Expressway Bridge	Low to Medium	Very Low	Negligible
Port River Expressway 1	Low to Medium	Very Low	Negligible
Port River Expressway 2	Very Low to Medium	Very Low	Negligible
Lady Gowrie Drive	Very Low	Very Low	Negligible
Military Road	Very Low to Low	Very Low	Negligible
Semaphore Road	Very Low	Very Low	Negligible
St Vincent Street	Low to Medium	Very Low	Negligible

Comparison of the EIS Traffic Model and Revised Traffic Model for 2041 Do Nothing Scenario

Within the EIS Traffic Model, the significance of effect was judged to range from Minor Adverse to Major Adverse for six road receptors assessment in 2041, because the development would result in perceptible changes to the road network and may affect travel behaviour for users of the road network to some degree, such as changing route choice.

Under the Revised Traffic Model, the significance of effect is assessed to range from Negligible to Minor Adverse. A like-for-like comparison between the EIS Traffic Model and the Revised Traffic Model is not possible due to several inherent differences in the modelling approach. In short, the reason the Revised Traffic Model results appear more favourable, or indicate less significant impacts, than those of the EIS Traffic Model is primarily due to:

- The design capacity range of the road receptors was adjusted to align with the TAM coding. This change affects the sensitivity of each receptor, as sensitivity is determined by comparing the existing volume of road users to the road’s design capacity. Therefore, any increase or decrease in road capacity directly influences the assessed sensitivity.
- The Revised Traffic Model also incorporates updated baseline vehicle volumes across the road network. Similar to the design capacity adjustment, this update impacts receptor sensitivity, since it is based on the ratio of existing traffic volumes to a roads design capacity.
- The Revised Traffic Model assumes the Future ANI Precinct related traffic demand is distributed across arrival time starting between 5:15 AM and 9:00 AM, compared to the narrower arrival time of 6:00 AM to 9:00 AM window used in the EIS Traffic Model. This broader distribution results in a lower impact magnitude during any given hour, as vehicle volumes are spread over a longer time period.

While the Revised Traffic Model identifies a lower level of significance for the road network, it still indicates that the development would lead to perceptible changes. These changes may influence travel behaviour to some extent, such as altering route choices for road users. This is more effectively illustrated through the predicted travel times for workers commuting to and from the FANIP.

2041 Do Nothing Scenario Travel Times

Figure 8.3 below illustrates the key travel time routes for workers commuting to and from the FANIP, as well as key locations where traffic flow and demand are compared. The corresponding travel time results for these routes are presented in Table 8.6.

The minimum travel time serves as a benchmark for expected conditions during periods of low traffic, such as the beginning of the morning peak or the end of the evening peak. Comparing this with the average and maximum travel times provides insight into the types of delays likely to occur due to network performance. The results in Table 8.6 highlight that the road network is currently saturated and struggling to accommodate the proposed demand effectively.

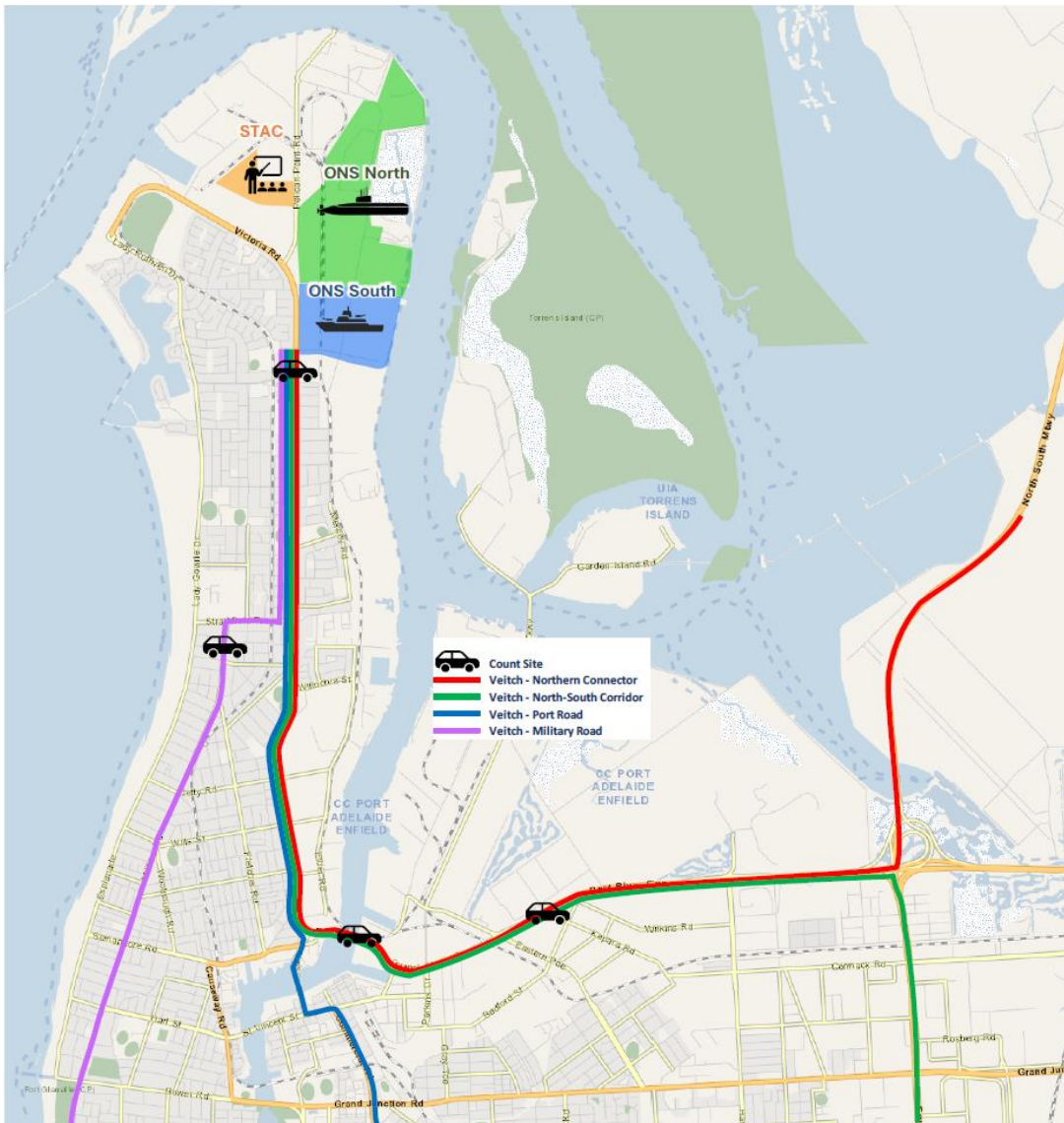
Table 8.6: 2041 Do Nothing Travel Time Results

Route (Figure 8.3)	Minimum Time*	Average Time*	Maximum Time*	Minimum Time*	Average Time*	Maximum Time*
	AM Period			PM Period		
Red Route: Northern Connector to Veitch	19 minutes	45 minutes	100 minutes	17 minutes	39 minutes	56 minutes
Green Route North: South Corridor to Veitch	18 minutes	27 minutes	73 minutes	18 minutes	39 minutes	56 minutes

Route (Figure 8.3)	Minimum Time*	Average Time*	Maximum Time*	Minimum Time*	Average Time*	Maximum Time*
	AM Period			PM Period		
Blue Route: Port Road to Veitch	13 minutes	19 minutes	41 minutes	14 minutes	36 minutes	58 minutes
Purple Route: Military Road to Veitch	12 minutes	13 minutes	16 minutes	14 minutes	27 minutes	59 minutes

*Times rounded to nearest minute.

Figure 8.3: Travel Time Routes



Assessment of Effects - 2041 Do Something Scenario

The 2041 modelling for the Do Something Scenario (i.e., implementation of mitigation measures) within the Revised Traffic Model accounts for the following indicative mitigation measures, these are displayed within Figure 8.4.

- Inclusion of four new signalised intersections along Victoria Road.
 - Osborne Road
 - Gedville Road / Dimboola Street
 - Strathfield Terrace
 - Kolapore Avenue
- Upgrade of three existing signalised intersections. These upgrades have involved the inclusion of a third through lane for the primary movement i.e. to/from the FANIP. An additional right turn lane into Nelson Street was also included.
 - Victoria Road / Wills Street
 - Victoria Road / Nelson Street / Port River Expressway
 - Port River Expressway / Perkins Road / Francis Street
- Upgrade of frequency of Outer Harbor Rail services. The upgraded rail services are assumed to triple the existing mode share. This equates to a modest reduction in workers driving to site (80 passengers).
 - Inclusion of a dedicated shuttle from Osborne Station to the FANIP
 - Inclusion of subsidised fares for FANIP workers
- Offsite car park for FANIP workers.
 - 1,500 space car park
 - Dedicated bus services for FANIP workers between the carpark and the FANIP
 - The indicative location of the offsite car park is outside of Lefevre Peninsula

It should be noted that there is no commitment on DIT nor the Proponent to implement or deliver these mitigation measures. The Do Something Scenario is included solely for the purpose of understanding how the road network may perform in the future, if mitigation measures were included to help address the impacts identified. As outlined previously, traffic investigations will continue to be progressed in partnership with DIT. It is proposed that the requirement to complete this will be secured by a Reserve Matter on the development approval, and other State and Commonwealth Government's departments, to inform the selection of final mitigation measures to be implemented.

Figure 8.4: 2041 Do Something mitigation measures



The 2041 Do Something assessment shows that with mitigation measures in place, there are no road receptors operating over their design capacity (Figure 8.5). This is an improvement over the Do Nothing Scenario (Figure 8.2), although it is noted that a number of road receptors are still operating at or near capacity. The magnitude of impact to receptors based on the modelled demand is provided within Table 8.7.

Figure 8.5: 2041 Do Something future traffic volumes show the projected vehicles per hour across nine locations during both the AM and PM period.

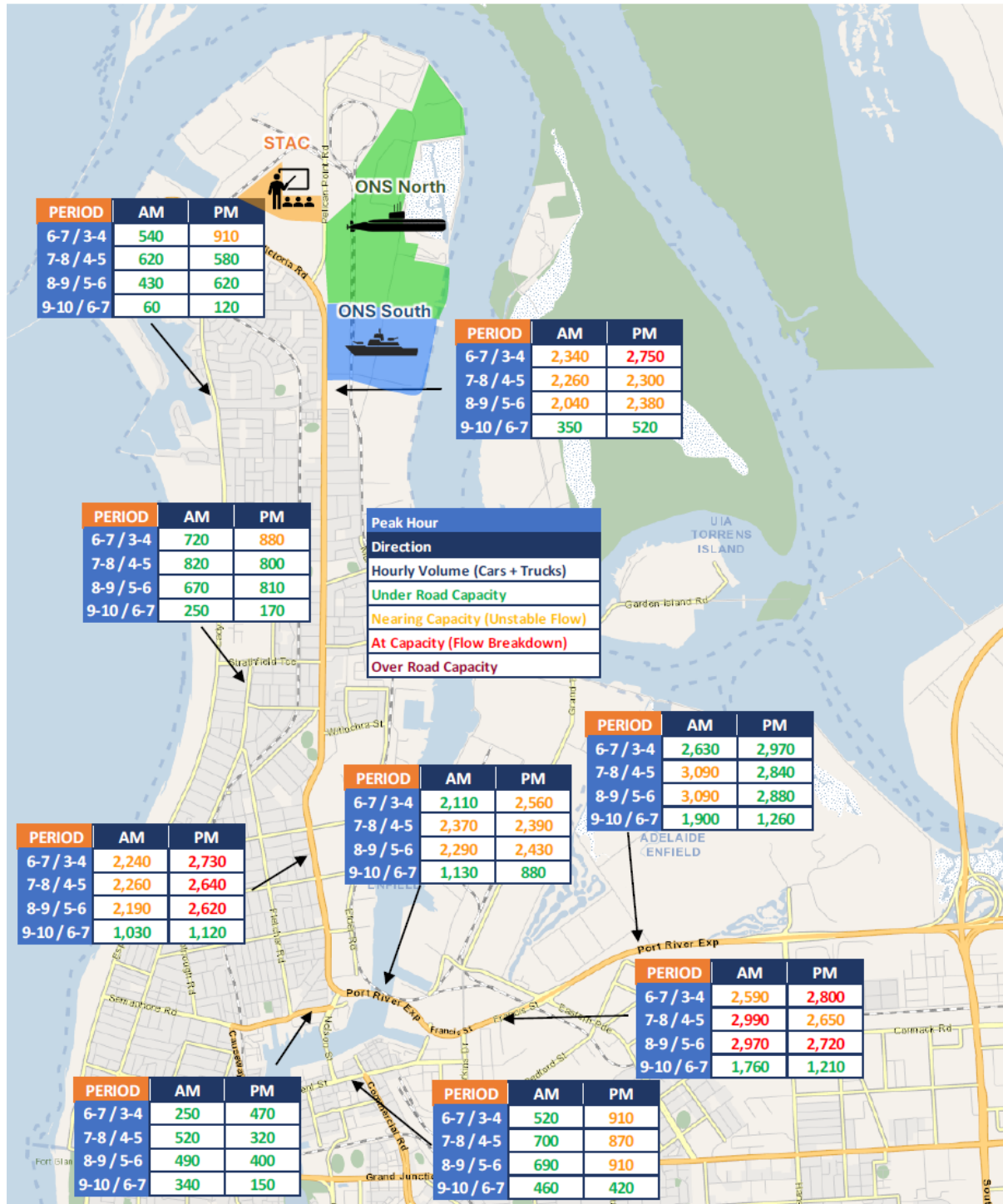


Table 8.7: Summary of Do Something Scenario impact magnitude for volumes

Receptor	2041 modelled development traffic movement (AM) *	2041 modelled development traffic movement (PM) *	Design Capacity Range	Predicted traffic demand as % of the modelled design capacity range (AM) **	Predicted traffic demand as % of the modelled design capacity range (PM) **	Impact Magnitude AM/PM***
Victoria 1	2340	2750	2,500 to 2,800	84%	98%	Very Low (AM) Low (PM)
Victoria 2	2260	2730	2,500 to 2,800	81%	98%	Very Low (AM) Low (PM)
Port River Expressway Bridge	2370	2560	2,700 to 3,000	79%	85%	Very Low (AM/PM)
Port River Expressway 1	2990	2800	2,700 to 3,000	100%	93%	Medium (AM) Low (PM)
Port River Expressway 2	3090	2970	3,600 to 4,000	77%	74%	Very Low (AM/PM)
Lady Gowrie Drive	620	910	1,050 to 1,150	54%	79%	Very Low (AM/PM)
Military Road	820	880	1,050 to 1,150	71%	77%	Very Low (AM/PM)
Semaphore Road	520	470	2,500 to 2,800	19%	17%	Very Low (AM/PM)

Receptor	2041 modelled development traffic movement (AM) *	2041 modelled development traffic movement (PM) *	Design Capacity Range	Predicted traffic demand as % of the modelled design capacity range (AM) **	Predicted traffic demand as % of the modelled design capacity range (PM) **	Impact Magnitude AM/PM***
St Vincent Street	700	910	950 to 1,050	67%	87%	Very Low (AM/PM)

*Highest number used to determine impact magnitude

**Calculated against highest number of the design capacity range.

*** Descriptors for Magnitude of Impact is provided within Table 9.3 of Chapter 9: Traffic and Transport

The significance of effects for the 2041 Do Something Scenario for the existing road receptors is provided within Table 8.8.

Table 8.8: Summary of significance of effect for Do Something Scenario

Receptor	Sensitivity	Impact Magnitude	Significance of Effect
AM Period			
Victoria 1	Very Low to Low	Very Low	Negligible
Victoria 2	Very Low to Low	Very Low	Negligible
Port River Expressway Bridge	Very Low to Medium	Very Low	Negligible
Port River Expressway 1	Low to Medium	Medium	Minor to Moderate Adverse
Port River Expressway 2	Low to Medium	Very Low	Negligible
Lady Gowrie Drive	Very Low	Very Low	Negligible
Military Road	Very Low to Low	Very Low	Negligible
Semaphore Road	Very Low	Very Low	Negligible

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Receptor	Sensitivity	Impact Magnitude	Significance of Effect
St Vincent Street	Very Low to Medium	Very Low	Negligible
PM Period			
Victoria 1	Very Low to Low	Low	Negligible
Victoria 2	Low to Medium	Low	Negligible to Minor Adverse
Port River Expressway Bridge	Low to Medium	Very Low	Negligible
Port River Expressway 1	Low to Medium	Low	Negligible to Minor Adverse
Port River Expressway 2	Very Low to Medium	Very Low	Negligible
Lady Gowrie Drive	Very Low	Very Low	Negligible
Military Road	Very Low to Low	Very Low	Negligible
Semaphore Road	Very Low	Very Low	Negligible
St Vincent Street	Low to Medium	Very Low	Negligible

Under the Revised Traffic Model, the significance of effect is judged to range from Negligible to Minor Adverse for all but one road receptor. A Minor to Moderate Adverse effect has been identified in the AM for the Port River Expressway 1. The reason for the Moderate Adverse effect is due to the rounding of the percentages within Table 8.7, which has rounded the predicted traffic demand to 100% of the modelled design capacity range. The actual percentage for the Port River Expressway 1 for the highest predicted traffic volumes in the AM is 99.7%, and thus should be classed as a 'Low' magnitude of impact as outlined within Table 9.3 of Chapter 9: Traffic and Transport. This is due to the predicted traffic demand being within the modelled design capacity range of the road.

As with the Do Nothing Scenario, whilst a reduced level of significance is identified for the road network, it is not possible for a like for like comparison to be made between the Do Nothing Scenario and Do Something Scenario based on the impact to the existing road receptors. This is better illustrated through the predicted travel times for workers commuting to and from the FANIP, as outlined below.

2041 Do Something Scenario Travel Times

Figure 8.3 displays the key travel time routes for workers travelling to / from the FANIP and key locations where flow and demand are compared. The travel time results for those routes within Figure 8.3 are provided within Table 8.9 for the Do Something Scenario.

Table 8.9: 2041 Do Something Travel Time Results

Route (Figure 8.3)	Minimum Time*	Average Time*	Maximum Time*	Minimum Time*	Average Time*	Maximum Time*
	AM Period			PM Period		
Red Route: Northern Connector to Veitch	17 minutes	22 minutes	29 minutes	17 minutes	23 minutes	30 minutes
Green Route North: South Corridor to Veitch	15 minutes	21 minutes	34 minutes	17 minutes	24 minutes	30 minutes
Blue Route: Port Road to Veitch	12 minutes	17 minutes	20 minutes	14 minutes	23 minutes	34 minutes
Purple Route: Military Road to Veitch	14 minutes	16 minutes	17 minutes	13 minutes	17 minutes	22 minutes

*Times rounded to nearest minute.

Comparison of Travel Times - Do Something vs Do Nothing

Table 8.10 presents a comparison of travel times between the Do Something and Do Nothing Scenarios. It shows the change in minutes between the two scenarios, based on data from Table 8.9 (Do Something) and Table 8.6 (Do Nothing). A negative value indicates an improvement in travel time (i.e., a reduction in minutes) for the Do Something Scenario compared to the Do Nothing Scenario.

Table 8.10 clearly demonstrates that the proposed mitigation measures have a significant impact in alleviating congestion and improving the overall performance of the road network.

Table 8.10: Comparison of Travel Times

Route (Figure 8.3)	Minimum Time*	Average Time*	Maximum Time*	Minimum Time*	Average Time*	Maximum Time*
	AM Period			PM Period		
Red Route: Northern Connector to Veitch	-2	-23	-71	0	-16	-26
Green Route North: South Corridor to Veitch	-3	-6	-39	-1	-15	-26
Blue Route: Port Road to Veitch	-1	-2	-21	0	-13	-24
Purple Route: Military Road to Veitch	2	3	1	-1	-10	-37

Conclusion and Residual Effects

While the mitigation measures modelled within the Revised Traffic Model are indicative, the scenario demonstrates that feasible and effective options are available to manage and reduce the potential traffic impacts associated with the SCY development as was highlighted within the EIS. Therefore, with appropriate mitigation measures in place, it is considered that the overall significance of residual effects relating to traffic and transport for the SCY can be reduced to a non-significant level.

Traffic investigations will continue to be progressed in partnership with DIT. It is proposed that the requirement to complete this will be secured by a Reserve Matter on the development approval, which will inform the selection of final mitigation measures.

This ongoing work will include further development and refinement of the traffic model to support detailed assessment and comparison of mitigation options as operational planning progresses and is finalised. Additionally, more detailed modelling and evaluation of specific mitigation options will be undertaken to support shortlisting and ultimately identify a preferred network approach.

Appendix A – Engagement Collateral

- Direct letter to stakeholders
- Engagement fact sheets and FAQs
- Letter box catchment area
- YourSAy EDM
- The Advertiser public notice
- Community drop-in session images
- Community drop-in display panels



Ref: 22690501

3 February 2025

Ms Jane Citizen
Role
Organisation

By email: [email]

**Planning & Land Use
Services**

Level 10
83 Pirie Street
Adelaide SA 5000

GPO Box 1815
Adelaide SA 5001
DX 171

Tel 08 7133 2804

Dear Ms Citizen

Have your say: nuclear-powered submarine construction yard

I am writing to let you know that the Environmental Impact Statement for the proposed nuclear-powered submarine construction yard at Osborne has been released for public consultation and invite you to provide feedback.

In March 2023, the Australian Government announced the pathway for the acquisition of a conventionally-armed nuclear-powered submarine capability for Australia. The preferred site for building the submarines is near the existing Osborne Naval Shipyard, about 19 km north-west of the Adelaide CBD.

Australian Naval Infrastructure (ANI) submitted a development application for the nuclear-powered submarine construction yard's construction and operation, and the Minister for Planning has declared that an Impact Assessed development process will apply.

This is the most rigorous and comprehensive level of development assessment in South Australia and is reserved for projects that are of economic, social or environmental importance to the state.

A key component of the Impact Assessed process is preparing an Environmental Impact Statement, which addresses the expected environmental, social and economic impacts and effects of the proposed development.

We are seeking feedback on the Environmental Impact Statement, prepared by ANI, for building and operating the Nuclear-Powered Submarine Construction Yard, associated launch and berthing facilities, and other infrastructure needed on site to build the submarines.

A detailed fact sheet is attached, which helps explain the process and outcomes of the Environmental Impact Statement.

Consultation on the Environmental Impact Statement is open until Monday, 17 March 2025.

Where to view the draft Environmental Impact Statement

A digital copy of the Environmental Impact Statement report and Executive Summary is available on the YourSAy website at: yoursay.sa.gov.au/submarine-construction-yard-eis.

A hard copy of the Environmental Impact Statement report and Executive Summary is also available to view at:

- Planning and Land Use Services (PLUS), Level 9, 83 Pirie Street, Adelaide
- Port Adelaide Library, 2-4 Church Street, Port Adelaide.

How to share your feedback

You can provide feedback on the Environmental Impact Statement by:

- completing our online survey:
yoursay.sa.gov.au/submarine-construction-yard-eis.
- completing the PlanSA online submission form:
plan.sa.gov.au/have_your_say/notified_developments/state_developments
- emailing: SPCreps@sa.gov.au with the subject “Submarine Construction Yard EIS submission”.
- posting your written submission to:
Attention Robert Kleeman, Manager State Assessment
Planning and Land Use Services
Department for Housing and Urban Development
GPO Box 1815, Adelaide SA 5000
- in-person, at one of the following information sessions:
 - Wednesday 19 February 2025, 11:30 am-1:30 pm, State Library, Corner North Terrace and Kintore Avenue, Adelaide
 - Thursday 20 February 2025, 5 pm-7 pm, Port Adelaide Plaza, 200-220 Commercial Road, Port Adelaide
 - Friday 21 February 2025, 1 pm-3 pm, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne
 - Saturday 22 February 2025, 1 pm-3 pm, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne.

Strategic Assessment

In November 2023, the Commonwealth Minister for Environment and Water and the Australian Submarine Agency entered into an agreement to undertake a Strategic Assessment of the Osborne Submarine Construction Yard under the *Environment Protection and Biodiversity Conservation Act 1999*.

Consultation on the Strategic Assessment is taking place at the same time as the South Australian Government’s consultation on the Environmental Impact Statement.

Details can be found at: asa.gov.au/projects/osborne-submarine-construction-yard.

Next steps

All feedback will be reviewed by ANI and considered by the State Planning Commission in their recommendation to the Minister for Planning.

The final decision will be published on the PlanSA website: plan.sa.gov.au.

Further information

For further information about the Submarine Construction Yard visit: ani.com.au/nuclear-powered-submarine-construction-yard.

Should you have any questions about the Environmental Impact Statement assessment process, contact PlanSA by:

- visiting the PlanSA website: plansa.sa.gov.au
- calling 1800 752 664
- emailing PlanSA@sa.gov.au

Yours sincerely

Robert Kleeman
MANAGER STATE ASSESSMENT
PLANNING AND LAND USE SERVICES







Attached: fact sheet






Environmental Impact Statement



Conclusions Factsheet



This factsheet provides a summary of the stated conclusions for each effect as assessed in the Environmental Impact Statement for the proposed Submarine Construction Yard located on the preferred development site in Osborne, South Australia.

Effect	Conclusion
 Local, Regional and State Economies	The finding from the assessment is that there are significant benefits to the South Australian economy at all levels through construction and operation of the development. However, the South Australian Government and Australian Government will need to give consideration and manage competition for skilled labour and land requirements.
 Air Quality	No significant air quality effects have been identified. Air quality can be maintained within acceptable limits for the environment and community through the adoption of infrastructure design (including controls and filtration) and standard construction and operation mitigation and management measures, as currently implemented on the existing Osborne Naval Shipyard.
 Transport and Traffic	No significant adverse effects on transport and traffic network during construction is anticipated. Traffic generated as a result of the development workforce during the operational phase, in combination with other planned growth on the Lefevre Peninsula, has the potential to exceed the road network design capacity from Port Adelaide, northwards up the Lefevre Peninsula if appropriate mitigations strategies are not adopted. Planning will need to be progressed, including partnerships with a number of government agencies, to manage capacity and cater for future demand to offset the future planned growth of the Lefevre Peninsula.
 Noise and Vibration	During construction, nearby receivers could experience short-term noise effects during construction however this is manageable and anticipated for development of this size and scale. Operational noise levels are expected to be the same as the existing Osborne Naval Shipyard facility, and with good infrastructure design, and application of the required design standards, are predicted to comply with relevant noise criteria. Traffic noise is expected to increase along the road network in the future as planned growth in the Lefevre Peninsula increases. Planning will need to be progressed, including partnerships with a number of government agencies, to manage capacity and cater for future demand to offset the future planned growth of the Lefevre Peninsula. No significant vibration effects are anticipated.
 Visual Amenity	There will be some long, medium and short views of the development where change will occur and infrastructure will be visually prominent. However, no significant effects have been identified given the existing industrial character of the development site and existing infrastructure in the surrounding area.
 Biosecurity	No significant effects have been identified in relation to biosecurity for both the construction and operational phases. Biosecurity can be controlled through the adoption of existing standard mitigation measures. These measures are the same as those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.
 Marine Flora and Fauna	No significant effects have been identified in relation to marine plants and animals. Potential impacts can be mitigated and controlled through the adoption of standard construction and operation mitigation measures. These measures are the same as those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.

Effect	Conclusion
 Terrestrial Flora and Fauna	<p>No significant effects have been identified in relation to terrestrial flora and fauna. Impacts can be controlled through the adoption of standard construction and operation mitigation measures. These measures are the same demonstrated successfully for those implemented during construction and in operation for the existing Osborne Naval Shipyard.</p>
 Climate Change Adaptation	<p>The climate adaptation and resilience measures identified and adopted by the development seek to minimise climate risks due to future climate change. The assessment has found that the development is resilient to likely climatic changes with no significant effects currently identified.</p>
 Greenhouse Gas Emissions	<p>No significant greenhouse gas emissions effects have been identified. The development's greenhouse gas emissions are considered to be a small component of State carbon budgets over the development's lifecycle. The development has the opportunity to adopt good practice measures to avoid and minimise greenhouse gas emissions during the construction and operation phases and will support South Australia's transition to net zero by or before 2050.</p>
 Waste Management	<p>No significant waste management effects have been identified. The development will adopt good practice measures to avoid and minimise waste and will follow the waste hierarchy (avoiding, reducing, reusing, recycling and recovering waste as a priority over treating and disposing waste). These measures are the same those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.</p> <p>All radioactive waste will be managed in accordance with international best practice and in accordance with Australia's international and domestic legal obligations and commitments.</p>
 Flooding	<p>No significant effects have been identified in relation to flooding for both the construction and operational phases.</p>
 Site and Groundwater Contamination	<p>Extensive site and groundwater investigations have been undertaken over time across the development site. Sampling, testing and reporting has to date confirmed that potential soil and groundwater contamination impacts during the construction and operational phases can be effectively and appropriately managed such that no significant effects are expected.</p> <p>Management measures required are the same as those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.</p>
 Coastal and Marine	<p>No significant effects have been identified in relation to the placement of dredged material within the Gulf St Vincent, nor from changes to coastal processes during operation of the development.</p>
 Surface Water and Groundwater	<p>No significant effects have been identified in relation to surface water and groundwater quality during the construction and operational of the development.</p>
 Aboriginal Cultural Heritage	<p>There are no known Aboriginal heritage sites within the development site. The development site has been assessed as having a low risk of works impacting unknown Aboriginal heritage sites. Any potential risk of encountering unknown Aboriginal heritage sites can be managed with standard construction mitigation measures.</p> <p>Overall, no significant effects have been identified on Aboriginal heritage sites. Management measures required are the same as those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.</p>

Effect	Conclusion
 <p>Community Wellbeing / Social Impact Assessment</p>	<p>It is acknowledged that the community may feel perceived impacts as a result of the development, however the assessment has not identified any significant effects. The development will generate social and community benefits and impacts, with most of these being beyond the area under the control of the development and Australian Naval Infrastructure (ANI). ANI, in partnership with the shipbuilder, will work with Local, State and Commonwealth Government to support the community through this change, to ensure locals and broader South Australians enjoy the benefits of the development, and negative impacts are minimised. For this reason, the Commonwealth, State and Local Government are working together to minimise social impact and maximise social opportunities. Management measures required are the same as those demonstrated successfully during construction and in operation for the existing Osborne Naval Shipyard.</p>
 <p>Heritage Places and Areas</p>	<p>No significant effects have been identified in relation to Heritage places and areas. There is no reasonable cause to suspect that excavation of the development site will result in an archaeological artefact of significance being discovered.</p>

For further details relating to each effect please read the Environmental Impact Statement Report or Executive Summary available at www.yoursay.sa.gov.au/submarine-construction-yard-eis.

If you have any questions about the Environmental Impact Statement process you can contact PlanSA on 1800 752 664 or email PlanSA@sa.gov.au.

For further information about the Submarine Construction Yard visit www.ani.com.au/nuclear-powered-submarine-construction-yard.

Environmental Impact Statement

Frequently Asked Questions



Issues important to the community

The Lefevre Peninsula is bound by Gulf St Vincent to the west and the Port River to the north and east. The Environmental Impact Statement for the Submarine Construction Yard considers the following sensitivities of the area:



Landscape - Historically, the Lefevre Peninsula comprised swamps, mangroves and sandy ridges. Whilst much of the land on the Peninsula has been modified and reclaimed through landfill, Mutton Cove is the last remaining area of remnant mangroves and samphire on the Peninsula.



Traditional ownership - Although the site is now highly modified reclaimed land, the Lefevre Peninsula is part of the traditional lands of the Kaurna people and closely tied to the Tjilbruke dreaming, a creation story that provides a set of rules to live with each other and the land.



Soils - Contamination of soils in the region is common due to a history of dredge spoil disposal or storage, fill or soil importation, wetlands or detention basins, and industrial burial. Soil subsidence has also been identified as a potential issue in the area.



Heritage - There are two State Heritage Places and three Local Heritage Places located in the area but are well beyond the site.



Water - Surface water on the Lefevre Peninsula is limited to stormwater basins that drain into the Port River at three main locations. Groundwater in the locality is known to be impacted by a number of contaminants.



Community - The broader Lefevre Peninsula precinct is a well-established residential area which is serviced by a range of community facilities.



Noise - The area is dominated by industrial and traffic noise, and background noise along the Port River from shipping movements and power stations.



Light - Power stations, container storage facilities and carparks contribute to artificial lighting on the Peninsula, however the site is currently vacant industrial land with no artificial lighting.



Flora and Fauna - There are several high ecological value sites in the region, which contain intact remnant vegetation or rehabilitation sites that support flora and fauna including some threatened and protected species.



Public Transport - There is one public railway line between Adelaide and Outer Harbour, two public bus services between Port Adelaide and ASC or North Haven, and no public river transport to the site.



Marine Life - The Port River and surrounding Barker Inlet is part of the Adelaide Dolphin Sanctuary which was established to support approximately 30 resident Indo-Pacific bottlenose dolphins (*Tursiops truncatus*) and a further 400 transient dolphins which visit at different times of the year.



Economics - The Lefevre Peninsula is an industrial and trade hub in the areas of manufacturing, services, retail, transport and logistics.

How will impacts to the Adelaide Dolphin Sanctuary be minimised?

The Port River and surrounding marine area includes the Adelaide Dolphin Sanctuary which is protected under the Adelaide Dolphin Sanctuary Act 2005 and managed by the Adelaide Dolphin Sanctuary Draft Management Plan 2024. The objectives of the Act and Sanctuary are to protect the dolphins in the Port River and Barker Inlet area and to protect the habitat on which they rely.

Specific consideration has been given to the Adelaide Dolphin Sanctuary and protection of the Indo-Pacific bottlenose dolphins (*Turisops aduncus*) in the Environmental Impact Statement.

The area impacted by the development is extremely small in the context of the entire Adelaide Dolphin Sanctuary. This area is approximately 11,800ha in total, representing just 0.1% of the total area of the Sanctuary. It is also a highly modified habitat in that it is used as South Australia's main shipping port and is exposed to human impacts, marine traffic, noise, light spill and stormwater pollution on a daily basis.

Impacts to the local population of Indo-Pacific bottlenose dolphins and other dolphins from construction activities will be a combination of direct (habitat removal) and indirect effects (turbidity, sedimentation, noise, vibration, water quality). Impacts from operation of the site will be more limited, including a combination of direct (lighting) and indirect (noise, water quality) from site maintenance and management operations.

Impacts will be managed through a range of mitigation measures including a Marine and Coastal Environmental Management Plan, a Storm Water Management Plan, a Biosecurity Management Plan and a Dredge Management Plan.

As such, there are no significant effects on the Adelaide Dolphin Sanctuary. Potential impacts can be mitigated and controlled through the adoption of standard construction and operation mitigation measures.



Figure 1: Adelaide Dolphin Sanctuary

How will Protected Areas be managed?

There are a number of protected areas and important areas of open space in or near the development site, including.

- › Torrens Island Conservation Park – lies across the Port River from the development site and is protected under the NPW Act and ADS Act.
- › Barker Inlet - St Kilda Wetland – lies within the marine based portion of the development site and is protected under Ramsar Convention and EPBC Act.
- › Mutton Cove Conservation Reserve – lies adjacent the development site and is protected under Crown Land Management Act and ADS Act.
- › Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara.
- › Biodiversity Park, Falie Reserve and Kardi Yarta.
- › Port Gawler and Buckland Park Lake.

Potential effects on protected areas and open spaces include the impacts of vegetation clearance, noise, light, air quality, contamination events, stormwater runoff, vehicle movements, excavation, restricted access, litter, and increased human activity.

All impacts will be managed through a range of mitigation measures including a Terrestrial Flora and Fauna Management Plan, a Storm Water Management Plan, a Biosecurity Management Plan and a Dredge Management Plan.

Will public access to Mutton Cove change?

Changes to publicly accessible areas, including Mutton Cove, Falie Reserve and the Snapper Point carpark, should be anticipated with the development of the Submarine Construction Yard.

Opportunities for public access to these areas will be confirmed once the site is fully operational. Public access will be subject to site security and license requirements under the Australian Radiation Protection and Nuclear Safety Act 1998 and the Australian Naval Nuclear Power Safety Act 2024 as well as general public safety requirements.



Figure 2: Aerial of Lefevre Peninsula

How will the Nuclear-Powered Propulsion System be managed?

The nuclear-powered propulsion systems for the submarines will be delivered to the development site as a fully manufactured and sealed package that is dry and inert.

At the development site the system will be stored inside a purposely constructed, safe and secure area until the submarine is ready to have the propulsion system installed in its hull.

It is anticipated the submarine construction, test and commissioning activities planned for Osborne will generate small amounts of low and very low-level radioactive waste. This will comprise waste like personal protective equipment, such as gloves, and materials including wipes, rags and plastic bags, which is similar to the waste generated by hospitals and research facilities around Australia. This low-level radioactive waste will need to be managed and temporarily stored in a licenced facility at the Osborne Submarine Construction Yard, in accordance with regulatory requirements

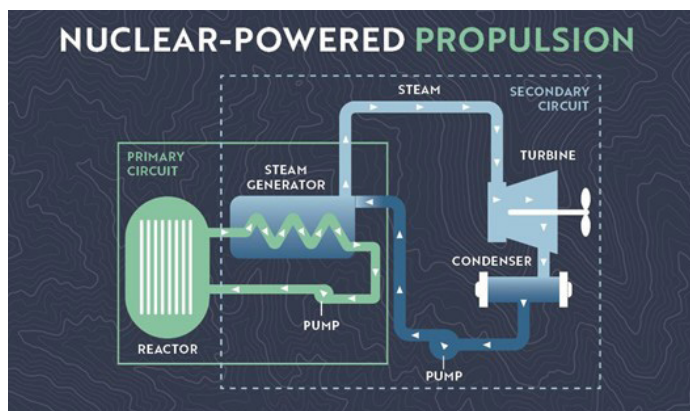


Figure 3: Diagram of nuclear-powered propulsion system

How will increased traffic be managed?

The Environmental Impact Statement identifies that during operation of the Submarine Construction Yard, traffic generated by the development workforce in combination with other planned growth on the Lefevre Peninsula, has the potential to increase and exceed the capacity of certain existing roads in the area and also increase road traffic noise if appropriate management strategies are not adopted. Traffic impacts generated by operations will not be felt for some time and therefore there are significant opportunities to plan for this change.

The Environmental Impact Statement recommends the traffic and transport options be progressed in partnership with government agencies and organisations to increase capacity to cater for this additional demand.

The SA Government has committed to the preparation of the Lefevre Peninsula Master Plan, which will ensure opportunities arising from the project can be maximised, including opportunities for improved public infrastructure.

In addition, to support the development of this region, the Department for Infrastructure and Transport (the Department) is already upgrading transport infrastructure in the area with a \$100 million commitment to road and rail infrastructure improvements jointly funded by the South Australian and Australian governments (50:50).

Visit: www.dit.sa.gov.au/infrastructure/road_projects/LefevreUpgradeProject

Will there be any impact on local heritage sites or shipwrecks?

The Environmental Impact Statement assessment determined that there are no state heritage places, state heritage areas, local heritage places, historic areas or known sites of historical archaeology located within the development site.

There are two state heritage places and three local heritage places in the vicinity of the development site. The closest of these is the Former Glen Arif House on Victoria Road which is 660m from south-west of the site. Due to the distance of these places from the site, there are no impacts likely to occur to these state and local heritage places because of the development.

There are five shipwrecks (the Corsair, Sigrid, Wildflower, Enchantress and Napperby) mapped within the marine-based portion of the subject site and two shipwrecks (Excelsior and Jupiter) located adjacent the development site on land in Mutton Cove as shown in the Figure below.

Six of these shipwrecks are unlikely to be affected by the development. The Excelsior is a historic shipwreck (over 75 years old) and is protected under the Historic Shipwrecks Act 1981. Potential impacts to the Excelsior are limited to vibratory impacts from construction activities for the development.

A Construction Vibration Management Plan will be developed and incorporated into the Construction Environmental Management Plan for the development.



Figure 4: Excelsior shipwreck

For further details relating to each effect please read the Environmental Impact Statement Report or Executive Summary available at www.yoursay.sa.gov.au/submarine-construction-yard-eis.

If you have any questions about the Environmental Impact Statement process you can contact PlanSA on 1800 752 664 or email PlanSA@sa.gov.au.

For further information about the Submarine Construction Yard visit www.ani.com.au/nuclear-powered-submarine-construction-yard.

Do you need these materials translated?

If you require translation services to help you understand this information, please contact:

- > Australian Government Translating and Interpreting Services: 13 14 50
- > South Australian Government Interpreting and Translating Centre: 1800 280 203.



Environmental Impact Statement

General Fact Sheet



Introduction

On 14 March 2023, the Commonwealth Government announced the acquisition of a conventionally-armed nuclear-powered submarine capability for Australia, and that a preferred site for a Submarine Construction Yard had been identified at Osborne, South Australia.

The Minister for Planning has declared that an Impact Assessed development process under section 108(1)(c) of the Planning, Development and Infrastructure Act 2016 will apply to construction of the nuclear-powered Submarine Construction Yard located at Osborne.

Subject to further assessment of the suitability of the preferred site, the Submarine Construction Yard will be built adjacent the existing Osborne Naval Shipyard, which is the most advanced and modern shipbuilding hub in Australia, and is owned and managed by Australian Naval Infrastructure.

Impact Assessed Development

The Impact Assessed pathway is the most rigorous level of development assessment in South Australia. It is reserved for major projects of economic, social or environmental importance to the State.

A key component of the Impact Assessed process is the preparation of an Environmental Impact Statement which addresses the expected environmental, social and economic impacts and effects of the proposed development.

The Environmental Impact Statement has now been prepared by Australian Naval Infrastructure for the Osborne Submarine Construction Yard.

As part of the process, an Environmental Impact Statement is required to be made publicly available for 30 business days to ensure the community have an opportunity to understand and comment on what is proposed.

Following public consultation, ANI will prepare a formal response document. The State Planning Commission will then undertake an assessment of the proposal and make a recommendation to the Minister for Planning.

What will be located on the Submarine Construction Yard?

More than 50 buildings will be on the site providing a range of manufacturing and associated activities including fabrication, welding, painting, warehousing, storage, assembly and testing, general workshop operations and component fit out.

The Submarine Construction Yard site will be divided into three areas as shown in Figure 1 below, consisting of:

- › Submarine fabrication (Area 1) which includes buildings and workshops to manufacture submarine components.
- › Submarine outfitting (Area 2) which includes buildings used to fit out the submarine sections.
- › Submarine consolidation, launching, testing and commissioning (Area 3) which includes a launch facility and wharf.



Figure 1 - Preferred development site divided into key areas.

What is the Submarine Construction Yard timeframe?

Construction of the yard is expected to take more than a decade with site establishment works starting in 2025, and completed in three phases as illustrated in Figure 2 below:

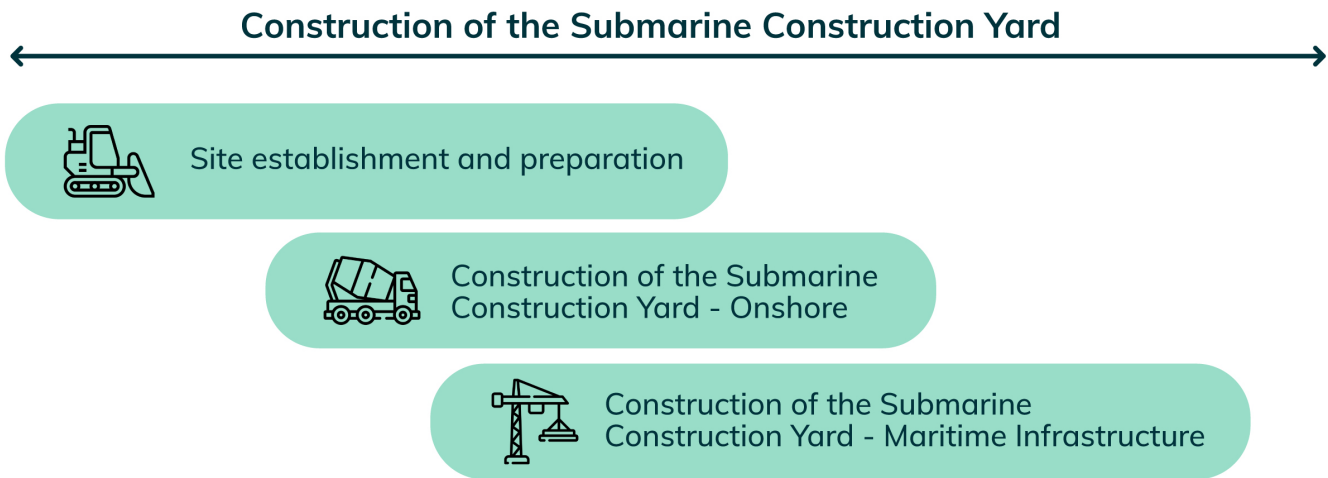


Figure 2 - Construction phases

Once built, the Submarine Construction Yard will be in operation for more than 30 years enabling five world-class submarines, known as the SSN-AUKUS, to be delivered to support security, peace and economic prosperity in the Indo-Pacific. The first Australian built nuclear-powered submarine is expected to be delivered by the early 2040s.

How will the submarine nuclear-powered propulsion systems be managed?

The nuclear-powered propulsion systems for the submarines will be delivered to the development site as a fully manufactured and sealed package that is dry and inert. At the development site the system will be stored inside a purposely constructed, safe and secure area until the submarine is ready to have the propulsion system installed in its hull.

It is anticipated the submarine construction, test and commissioning activities planned for Osborne will generate small amounts of low and very low-level radioactive waste. This will comprise waste like personal protective equipment, such as gloves, and materials including wipes, rags and plastic bags, which is similar to the waste generated by hospitals and research facilities around Australia. This low-level radioactive waste will need to be managed and temporarily stored in a licenced facility at the Osborne Submarine Construction Yard, in accordance with regulatory requirements.

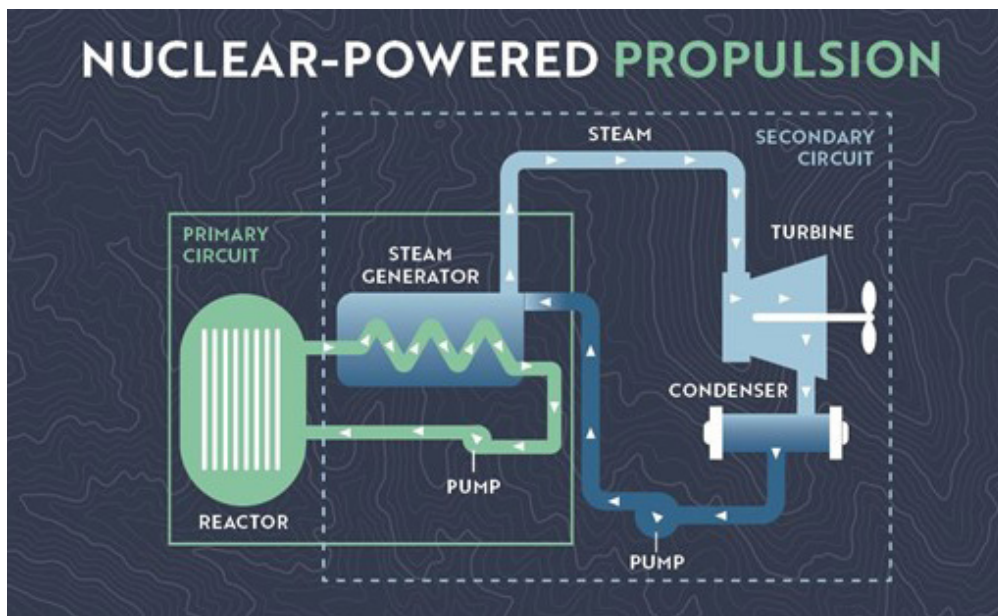


Figure 3 - Diagram of the nuclear-powered propulsion system

What effects did the Environmental Impact Statement identify?

The Environmental Impact Statement comprehensively assessed a range of sensitivities and any potential effects caused by the development during both the construction and operational phases of the Submarine Construction Yard.

Most of the effects were found to be minor in nature and can be addressed by standard mitigation measures. Some positive effects, particularly the economic benefits of the development, were also identified.

Overall, the Environmental Impact Statement identified that the development would have no significant effect on:

- › Air Quality
- › Vibration
- › Visual Amenity
- › Biosecurity
- › Marine Flora and Fauna
- › Terrestrial Flora and Fauna
- › Climate Change Adaption
- › Green House Gas Emissions
- › Waste Management
- › Flooding
- › Contamination
- › Coastal and Marine interface
- › Surface water and Groundwater
- › Aboriginal Cultural Heritage
- › Community Wellbeing
- › Heritage Places and Areas

Three residual significant effects, which are those effects that remain following the implementation of mitigation measures, have been identified by the Environmental Impact Statement, namely:

› Local, Regional and State Economies

There are significant long- and short-term benefits to the South Australian economy at all levels (local, regional and state) through construction and operation of the development. To maximise these, the Environmental Impact Statement identifies the need for the South Australian Government and Australian Government to consider the development's skilled labour and land requirements.

To address this impact and maximise the benefits to our community, the Commonwealth and South Australian Government are working collaboratively to develop a new Skills and Training Academy at Osborne, increase university places targeted at STEM disciplines as well as a range of other measures to grow the submarine and naval shipbuilding workforce including developing skills required for the construction of the SSN-AUKUS nuclear-powered submarines.

› Operational Traffic and Traffic Noise

During operation of the Submarine Construction Yard, traffic generated by the development workforce in combination with other planned growth on the Lefevre Peninsula, is expected to increase and the potential to exceed the capacity of certain existing roads in the area and also increase road traffic noise if appropriate management strategies are not adopted. These impacts can be addressed through a range of operational measures such as timing of shifts, public transport, and infrastructure improvements to be adopted as the workforce in the precinct grows. Traffic impacts generated by operations will not be felt for some time and therefore there are significant opportunities to plan for this change.

The SA Government has committed to the preparation of the Lefevre Peninsula Master Plan, which will ensure opportunities arising from the project can be maximised, including opportunities for improved public infrastructure. In addition, to support the development of this region, the Department for Infrastructure and Transport (the Department) is already upgrading transport infrastructure in the area with a \$100 million commitment to road and rail infrastructure improvements jointly funded by the South Australian and Australian governments (50:50). www.dit.sa.gov.au/infrastructure/road_projects/LefevreUpgradeProject

› Construction Noise

During construction, the Environmental Impact Statement identifies that nearby properties could experience short-term noise effects during the daytime however this is manageable and expected for a development of this size and scale.

During operation of the Submarine Construction Yard, noise levels are predicted to comply with relevant criteria for plant and equipment.

Strategic Assessment

On 24 November 2023, the Commonwealth Minister for the Environment and Water and the Australian Submarine Agency entered into an agreement to undertake a Strategic Assessment of the Osborne Submarine Construction Yard under the Environment Protection and Biodiversity Conservation Act 1999.

The Australian Submarine Agency is undertaking concurrent engagement on the Strategic Assessment for the Submarine Construction Yard from Monday 20 January 2025 to 5pm, Monday 3 March 2025.

Details can be found at www.asa.gov.au/projects/osborne-submarine-construction-yard

How can I find out more?

You can view the Environmental Impact Statement Report and supporting documents by scanning the QR code below:



Or visit the YourSAy website: www.yoursay.sa.gov.au/submarine-construction-yard-eis

A hard copy is also available to view at:

- › Planning and Land Use Services – Level 9, 83 Pirie Street, Adelaide
- › Port Adelaide Library – 2-4 Church St, Port Adelaide

You can talk to a member of the project team at a community drop-in session at the following dates, times and locations:

- › 11.30am-1.30pm, Wednesday 19 February 2025, State Library, Cnr North Terrace & Kintore Ave, Adelaide
- › 5pm-7pm, Thursday 20 February 2025, Port Adelaide Plaza, 200-220 Commercial Road, Port Adelaide
- › 1pm -3pm, Friday 21 February 2025, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne
- › 1pm-3pm, Saturday 22 February 2025, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne.

If you have any questions about the Environmental Impact Statement process you can contact PlanSA on 1800 752 664 or email PlanSA@sa.gov.au

For further information about the Submarine Construction Yard visit www.ani.com.au/nuclear-powered-submarine-construction-yard

Consultation closes 5pm, Monday 17 March 2025.

Undertaking meaningful, authentic engagement with the local community and stakeholders is an important part of the Impact Assessed development process. The engagement has been designed in accordance with the Community Engagement Charter.

How can I have my say?

We would like to hear your views on the Environmental Impact Statement Report which is available for public feedback from **Monday 3 February to Monday 17 March 2025**. During this time you can lodge a written submission about any aspect of the Report.

You can provide your feedback in the following ways:

- › **Via our online survey** at www.yoursay.sa.gov.au/submarine-construction-yard-eis or scan the QR code.
- › **By completing the PlanSA submission form** available at www.plan.sa.gov.au/have_your_say/notified_developments/state_developments
- › **By email:** SPCreps@sa.gov.au with “Submarine Construction Yard EIS submission” in the subject line.
- › **In writing addressed to:**
Attention Robert Kleeman
Manager Crown and Impact Assessment
Planning and Land Use Services
Department of Housing and Urban Development
GPO Box 1815, Adelaide SA 5000.

How will I know my feedback has been used?

Each submission will be registered, and you will receive an email confirming receipt. Your responses will be made available on the PlanSA and YourSAy website. Personal addresses, email addresses and telephone numbers will not be published, however, business information will be.

What are the next steps?

A What We Heard Report will be prepared, summarising all the feedback received during this engagement process and published on the PlanSA and YourSA websites.

Your feedback will be important in developing ANI's Response Document. The State Planning Commission will also consider your input when making a recommendation to the Minister for Planning. The Minister's final decision will be published on the PlanSA and YourSAy websites.

We are required to evaluate this engagement process to ensure that it is genuine, fit for purpose and transparent. Participants will be contacted and asked to complete a short evaluation survey after the engagement process has finished.

Do you need these materials translated?

If you require translation services to help you understand this information, please contact:

- › Australian Government Translating and Interpreting Services: 13 14 50
- › South Australian Government Interpreting and Translating Centre: 1800 280 203.



Client Contact: Emma Williams

Project Name: Aust Naval Infrastructure – EIS

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Environmental Impact Statement General Fact Sheet

How can I find out more?

You can view the Environmental Impact Statement Report and supporting documents by scanning the QR code below.



Or visit the YourSA website: www.your.sa.gov.au/submarine-construction-yard-its

A hard copy is also available to view at:

- Planning and Land Use Services – Level 9, 83 Flies Street, Adelaide

- Port Adelaide Library – 2-4 Church St, Port Adelaide
- You can talk to a member of the project team at a community drop-in session at the following dates, times and locations:
 - 11.30am-1.30pm, Wednesday 19 February 2025, State Library, 100 North Terrace & Kinross Ave, Adelaide
 - 5pm-7pm, Thursday 20 February 2025, Port Adelaide Plaza, 200-220 Commercial Road, Port Adelaide
 - 1pm-3pm, Friday 21 February 2025, Lefevre Room, Lefevre Community Stadium, 514 Victoria Road, Osborne
 - 1pm-3pm, Saturday 22 February 2025, Lefevre Room, Lefevre Community Stadium, 514 Victoria Road, Osborne

What are the next steps?
A What We Heard Report will be prepared, summarising all the feedback received during this engagement process and published on the PlanSA and YourSA websites.

Your feedback will be important in developing the Response Document. The State Planning Commission will also consider your input when making a recommendation to the Minister for Planning. The Minister's final decision will be published on the PlanSA and YourSA websites.

We are required to evaluate this engagement process to ensure that it is genuine, fit for purpose and transparent. Participants will be contacted and asked to complete a short evaluation survey after the engagement process has finished.

Consultation closes 5pm, Monday 17 March 2025.

Undertaking meaningful, authentic engagement with the local community and stakeholders is an important part of the Impact Assessed development process. The engagement has been designed in accordance with the Community Engagement Charter.

Do you need these materials translated?

- For more translation services to help you understand this information, please contact:
 - Australian Government Translating and Interpreting Service 13 14 60
 - South Australian Government Interpreting and Translating Centre 0800 980 586



Environmental Impact Statement General Fact Sheet

What is the Submarine Construction Yard timeframe?

Construction of the yard is expected to take more than a decade with site establishment works starting in 2025, and completed in three phases as illustrated in Figure 7 below.

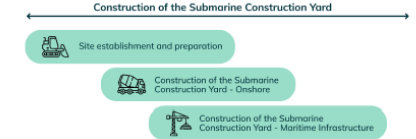


Figure 7 - Construction phases

Once built, the Submarine Construction Yard will be in operation for more than 30 years enabling five world-class submarines, known as the SSN-AUKUS, to be delivered to support security, peace and economic prosperity in the Indo-Pacific. The first Australian built nuclear-powered submarine is expected to be delivered by the early 2040s.

How will the submarine nuclear-powered propulsion systems be managed?

The nuclear-powered propulsion systems for the submarines will be delivered to the development site as a fully manufactured and sealed package that is dry and inert. At the development site the system will be stored inside a purposely constructed, safe and secure area until the submarine is ready to have the propulsion system installed in its hull. It is anticipated the submarine construction, test and commissioning activities planned for Osborne will generate small amounts of low and very low-level radioactive waste. This will comprise waste like personal protective equipment, such as gloves, and materials including pipes, tags and plastic bags, which is similar to the waste generated by hospitals and research facilities around Australia. This low level radioactive waste will need to be managed and temporarily stored in a licensed facility at the Osborne Submarine Construction Yard, in accordance with regulatory requirements.

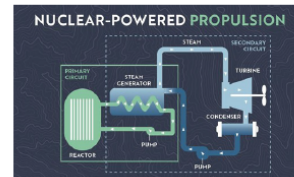


Figure 8 - Diagram of the nuclear-powered propulsion system

Environmental Impact Statement
General Fact Sheet



Introduction

On 14 March 2023, the Commonwealth Government announced the acquisition of a conventionally-armed nuclear-powered submarine capability for Australia, and that a preferred site for a Submarine Construction Yard had been identified at Osborne, South Australia.

The Minister for Planning has declared that an Impact Assessed development process under section 100(1)(c) of the Planning, Development and Infrastructure Act 2016 will apply to construction of the nuclear-powered Submarine Construction Yard located at Osborne. Subject to further assessment of the suitability of the preferred site, the Submarine Construction Yard will be built adjacent the existing Osborne Naval Shipyard, which is the most advanced and modern shipyard built in Australia, and is owned and managed by Australian Naval Industries.

Impact Assessed Development

The Impact Assessed pathway is the most rigorous level of development assessment in South Australia. It is reserved for major projects of economic, social or environmental importance to the State.

A key component of the Impact Assessed process is the preparation of an Environmental Impact Statement which addresses the expected environmental, social and economic impacts and effects of the proposed development.

The Environmental Impact Statement has now been prepared by Australian Naval Industries for the Osborne Submarine Construction Yard.

As part of the process, an Environmental Impact Statement is required to be made publicly available for 30 business days to ensure the community have an opportunity to understand and comment on what is proposed.

Following public consultation, ANI will prepare a formal response document. The State Planning Commission will then undertake an assessment of the proposal and make a recommendation to the Minister for Planning.

What will be located on the Submarine Construction Yard?

More than 50 buildings will be on the site providing a range of manufacturing and associated activities including fabrication, welding, painting, wireworking, storage, assembly and testing, general workshop operations and component fit out.

- The Submarine Construction Yard site will be divided into three areas as shown in Figure 1 below, consisting of:
 - Submarine fabrication (Area 1) which includes buildings and workshops to manufacture submarine components;
 - Submarine outfitting (Area 2) which includes buildings used to fit out the submarine sections;
 - Submarine consolidation, launching, testing and commissioning (Area 3) which includes a launch facility and wharf.



Figure 1 - Preferred development site divided into key areas.

Environmental Impact Statement General Fact Sheet

What effects did the Environmental Impact Statement identify?

The Environmental Impact Statement comprehensively assessed a range of cumulative and any potential effects caused by the development during both the construction and operational phases of the Submarine Construction Yard. Most of the effects were found to be minor in nature and can be addressed by standard mitigation measures. Some positive effects, particularly the economic benefits of the development, were also identified.

Overall, the Environmental Impact Statement identified that the development would have no significant effect on:

- Air Quality
- Vibration
- Visual Amenity
- Biosecurity
- Marine Flora and Fauna
- Terrestrial Flora and Fauna
- Climate Change Adaptation
- Green House Gas Emissions
- Waste Management
- Flooding
- Contamination
- Coastal and Marine Interface
- Surface water and Groundwater
- Aboriginal Cultural Heritage
- Community Wellbeing
- Heritage Places and Areas

There remain a number of effects, which are those effects that remain following the implementation of mitigation measures, have been identified by the Environmental Impact Statement, namely:

- Local, Regional and State Economics
- There are significant long- and short-term benefits to the South Australian economy at all levels (local, regional and state) through construction and operation of the development. To maximise these, the Environmental Impact Statement identifies the need for the South Australian Government and Australian Government to consider the development's skilled labour and land requirements. To address this impact and maximise the benefits to our community, the Commonwealth and South Australian Governments are working collaboratively to develop a new Skills and Training Academy at Osborne, increase university places targeted at STEM disciplines as well as a range of other measures to grow the submarine and naval shipbuilding workforce including developing skills required for the construction of the SSN-AUKUS nuclear-powered submarines.

Operational Traffic and Traffic Noise

During operation of the Submarine Construction Yard, traffic generated by the development workforce in combination with other planned growth on the Lefevre Peninsula, is expected to increase and the potential to exceed the capacity of certain existing roads in the area and also increase road traffic noise. If appropriate management strategies are not adopted, these impacts can be addressed through a range of operational measures such as timing of shifts, public transport, and infrastructure improvements to be adopted as the workforce in the precinct grows. Traffic impacts generated by operations will not be felt for some time and therefore there are significant opportunities to plan for this change.

The SA Government has committed to the preparation of the Lefevre Peninsula Master Plan, which will ensure opportunities arising from the project can be maximised, including opportunities for improved public infrastructure. In addition, to support the development of this region, the Department for Infrastructure and Transport (the Department) is already upgrading transport infrastructure in the area with a \$300 million commitment to road and rail infrastructure improvements partly funded by the South Australian and Australian governments (S300). www.dit.sa.gov.au/infrastructure-road-projects/lefevre-peninsula-project

Construction Noise

During construction, the Environmental Impact Statement identifies that nearby properties could experience short term noise effects during the daytime however, this is manageable and expected for a development of this size and scale.

During operation of the Submarine Construction Yard, noise levels are predicted to comply with relevant criteria for noise and equipment.

Strategic Assessment

On 24 November 2023, the Commonwealth Minister for the Environment and Water and the Australian Submarine Agency entered into an agreement to undertake a Strategic Assessment of the Osborne Submarine Construction Yard under the Environmental Protection and Biodiversity Conservation Act 1999.

The Australian Submarine Agency is undertaking ongoing engagement on the Strategic Assessment for the Submarine Construction Yard from Monday 21 February to Monday 17 March 2025.

Details can be found at www.sa.gov.au/projects/submarine-construction-yard

- **ALL COMMERCIAL AND RESIDENTIAL PROPERTIES**, every property must get a letter unless otherwise noted, please distribute along (inner side only) and within the red boundary line
- Report any non deliveries on map and also in extranet when uploading.



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- Report any non deliveries on map and also in extranet when uploading.



Find out what government decisions you can influence this month

13 February 2025

yourSAy



South Australian Tourism Commission

Your February update has landed

As we usher in the vibrant festival season and get ready for the excitement and celebration all around, we invite you to take a moment to explore various SA Government projects and initiatives open for consultation.

In this edition we highlight opportunities for you to have your say on key issues covering regional healthcare, environmental protection, biodiversity, design and code planning, plus much more.

Get involved in shaping our community's future. Your views matter - get involved and have your say!

[Explore YourSAy](#)

Current engagements



Nuclear-Powered Submarine Construction Yard Project – Environmental Impact Statement

We are seeking feedback on the Environmental Impact Statement for building and operating the Nuclear-Powered Submarine Construction Yard, associated launch and berthing facilities, and other infrastructure needed on site to build the submarines.

The Environmental Impact Statement, prepared by [Australian Naval Infrastructure \(ANI\)](#) identifies and considers potential impacts due to the development, its operations and any associated changes in land use, both on land and in coastal waters.

The consultation will consider impacts on plants, animals, heritage, community and the economy, and how these impacts can be mitigated or minimised during the construction and operation of the Submarine Construction Yard.

Get involved

**your
SAY**

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Class action 'rip-off' fury

Lawyers slammed on payout share

Clare Armstrong

Australians are growing increasingly sceptical about how much class actions really help mum-and-dad claimants, with three in four people fearing lawyers and their funders are the real big winners.

With class actions on track to hit a record high in 2024-25 – with, on average, one suit filed every five days in the six months to December – there is overwhelming support to tighten current laws to ensure victims are receiving the biggest benefit from legitimate claims.

About 73 per cent of people back capping the amount litigation funders and lawyers can take from a payout, according to a Resolve survey of 1600 people commissioned by the Menzies Research Centre.

Only 25 per cent surveyed believed claimants are the main beneficiaries of claims, and just 19 per cent agree law firms charge "reasonable" fees.

There is widespread scepti-

cism around the so-called "business model" of litigation funders covering legal fees in exchange for a percentage of any successful payout award, with fewer than one in four people believing this is appropriate.

By comparison, about 74 per cent supported a "no-win, no-fee" model, 43 per cent were in favour of crowd-funding via campaigns, and 31 per cent backed self-funding.

It comes as 2024-25 is on track to become the biggest year for class actions in Australia, with 35 new lawsuits launched so far against businesses including BHP, Rio Tinto, Jetstar, Harvey Norman, Sportsbet, Google, Coles, Johnson & Johnson and Woolworths.

The current record for a full financial year was in 2020-21 when 65 suits were filed.

Menzies Research Centre executive director David Hughes said Australia's class-action system was designed to "deliver justice to people, not to funnel mega-profits to lawyers

and litigation funders". "Far too often, claimants are forced to wait years for class actions to settle or be resolved in court, only to watch lawyers and funders walk away with half the payout," he said. "This is an old-fashioned rip-off."

Mr Hughes said Australians wanted the class-action system "fixed" so claimants could "get a fair go".

"Our research shows overwhelming support for capping payouts to big law firms and foreign litigation funders."

In 2022, the Labor government scrapped oversight of the litigation-funding industry by the regulator, the Australian Securities and Investments Commission, removed the requirement for funders to hold an Australian Financial Services Licence, and exempted funders from transparency and disclosure obligations.

These changes have been blamed for accelerating the growth of Australia's litigation funding industry.



Lenny Deacon and his dog Lucky are riding around Australia for mental health. Picture: Kelly Barnes

Epic ride for great mate

Agnes Gichuhi

It was the tragic death of a close friend that changed Lenny Deacon's life – propelling him to turn his pain into purpose to help other men tackle their mental health.

"I still miss him all the time, but time does make the pain fade a bit and you learn how to deal with it," Mr Deacon said, speaking about Simon Wheaton, who died by suicide three years ago.

"He was an awesome role model and community spirit,

community person and loved his footy club. He was always, hands on, right in the thick of it, sort of a bloke."

Mr Deacon masterminded a "shearathon" to help channel the "hurt and loss into something positive".

He's riding 16,000km around Australia on a Greenspeed GTR recumbent bike, with his beloved sidekick dog Lucky and a support crew.

"It just fuels me to keep going. I can't stop now even if I wanted to, it wouldn't sit

right with me," the 46-year-old said.

As he prepares to go to Kangaroo Island on Monday, the Perth-born traveller said it had been "absolutely amazing" to meet people along the way, many of whom had opened up about their own mental health challenges.

Mr Deacon has raised more than \$8000 for The Breakthrough Mental Health Research Foundation and hopes people have learned to open up if they're struggling.

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Government of South Australia

Department for Housing and Urban Development

PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

NUCLEAR-POWERED SUBMARINE CONSTRUCTION YARD PROJECT – AUSTRALIAN NAVAL INFRASTRUCTURE – IMPACT ASSESSED DEVELOPMENT RELEASE OF AN ENVIRONMENTAL IMPACT STATEMENT FOR PUBLIC COMMENT

On 15 February 2024, the Minister for Planning declared the Nuclear-Powered Submarine Construction Yard Project by Australian Naval Infrastructure (ANI) at Mersey Road North and Pelican Point Road, Osborne, an Impact Assessed Development pursuant to section 108(1)(c) of the Planning, Development and Infrastructure Act 2016 (the PDI Act).

Note: an amended declaration was made on 10 October 2024 to exclude certain related works from the current assessment process.

A development application was received from ANI and was referred to the State Planning Commission for consideration in accordance with the requirements of the PDI Act.

The proposal can generally be described as development involving a change in land use (both on land and coastal waters) and building work associated with the construction and operation of a submarine construction yard, and related facilities and infrastructure (as outlined in the declaration notice available at plan.sa.gov.au).

On 8 August 2024 the State Planning Commission issued Assessment Requirements to guide the preparation of an Environmental Impact Statement (EIS) by ANI.

ANI has now prepared the EIS, which has been released for public comment from Monday 3 February 2025 until Monday 17 March 2025.

How to access the Environmental Impact Statement

The EIS can be accessed online at plan.sa.gov.au and yoursay.sa.gov.au/submarine-construction-yard-eis.

Hard copies are available to view at:

- Department for Housing and Urban Development, Planning and Land Use Services: Level 9, 83 Pirie Street, Adelaide (please call the PlanSA Help Desk on 1800 752 664 beforehand to confirm access and visitation arrangements)
- Port Adelaide Library, 2-4 Church Street, Port Adelaide.

To purchase a hard copy, please contact PlanSA on 1800 752 664.

Community Information Sessions

Join our information sessions with Planning and Land Use Services and ANI representatives to learn about the project and the impact assessment process:

- 19 February 2025, 11:30 am-1:30 pm, State Library, Cnr North Tce and Kintore Ave, Adelaide
- 20 February 2025, 5 pm-7 pm, Port Adelaide Plaza, 200-220 Commercial Road, Port Adelaide
- 21 February 2025, 1 pm-3 pm, Lefevre Community Stadium, 541 Victoria Road, Osborne
- 22 February 2025, 1 pm-3 pm, Lefevre Community Stadium, 541 Victoria Road, Osborne

For further information and to attend a session, visit yoursay.sa.gov.au/submarine-construction-yard-eis or plan.sa.gov.au.

Submissions

Submissions are invited until Monday, 17 March 2025 via:

- Online: plan.sa.gov.au and yoursay.sa.gov.au/submarine-construction-yard-eis
- Email: spcreps@sa.gov.au (Subject: Nuclear-Powered Submarine Construction Yard EIS Submission)

Written:

Minister for Planning
Attention: Robert Kleeman, Manager, Crown and Impact Assessment
Planning and Land Use Services, Department for Housing and Urban Development
GPO Box 1815, ADELAIDE SA 5000

All submissions will be made available to ANI to prepare a Response Document, and then published on the PlanSA website. Personal details such as names and email addresses will not be published.

Next Steps

Following submission of the Response Document, an Assessment Report will be prepared by the State Planning Commission, which will be provided to the Minister for Planning for consideration. A decision can then be made on the proposed development.

Tracks of my youth

From previous page

Then there were occasions when he and/or the fireman removed ash and cinders from the collection tray beneath the firebox using a very long scraper, so we “helped” them here too. Sometimes, to relieve pressure from the boiler, the engine driver released steam through large horizontal pipe below the cabin, not far above the ground, resulting in a blast of water vapour billowing across the ground at great speed for a good 60 feet or so – making a dickens of a noise.

RARE OPPORTUNITY

Finally, at last our prayers, or rather our pleading stares, were answered. One glorious Saturday afternoon, the driver – ensuring that the guard was looking the other way – invited Barry and I to climb aboard this huge fire-breathing, screeching Mikado

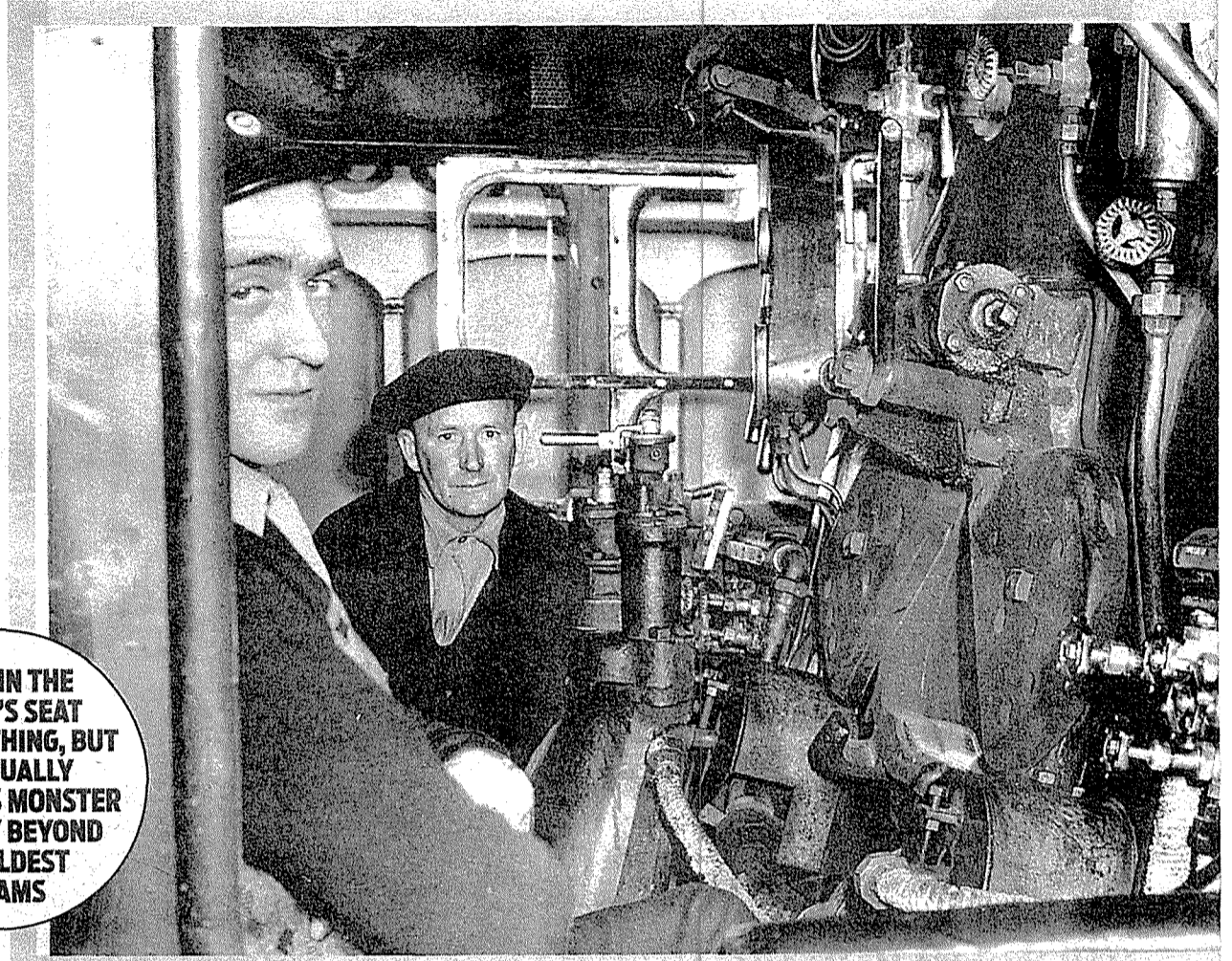
steam engine. We knew that the driver was taking a bit of a risk because kids were not allowed on the train. We were ecstatic!

Even climbing up the huge metal steps, high above the ground, was exciting. This was heaven. Barry took the fireman’s seat on the right hand side of the cabin, and I sat in the engine driver’s seat on the left.

We took turns shoveling heavy coal into the firebox. It was quite an effort to get the shovel through the firebox door without spilling coal.

It was equally challenging to spread the coal evenly across the floor of the firebox simply because the vacuum created by the fire sucked the coal off our shovel.

TO SIT IN THE DRIVER’S SEAT WAS ONE THING, BUT TO ACTUALLY DRIVE THIS MONSTER WAS WAY BEYOND MY WILDEST DREAMS



WORK EXPERIENCE

This wasn’t an easy job – but then we were only kids. Still, our respect for the fireman’s lot increased dramatically after that brief work experience.

The big moment arrived when the engine driver instructed me to release

the air brakes. To sit in the driver’s seat was one thing, but to actually drive this monster was way beyond my wildest dreams.

After releasing the brakes I pulled on a piece of rope from the roof operating the whistle. Whacko! Then the driver instructed me to firmly

grasp a large vertical lever, and ever-so-gently pull it towards me. It was like an oversized handbrake in a car, hinged from the upper part of the furnace bulkhead.

With superheated steam screeching into both cylinders way up front, the engine reluctantly started



Australian Government
Australian Submarine Agency



Public Notice

Environment Protection and Biodiversity Conservation (EPBC) Act 1999 – Part 10 Draft Strategic Impact Assessment Report available for public comment

This notice is published in keeping with Part 10 section 146(2)(b) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Australian Submarine Agency (ASA) invites the community to review the Draft Strategic Impact Assessment Report (Draft Report) for the Osborne Submarine Construction Yard (SCY) and submit a comment during the Public Comment Period. Comments may be submitted via the ASA website, email or in-person at our community drop-in sessions.

The Public Comment Period is specified by the Commonwealth Minister under section 146(2)(b) of the EPBC Act. In accordance with the provision of the EPBC Act, the ASA is required to publish the Draft Report for public comment. The Draft Report is available for comment until **Monday 17 March 2025**.

The ASA will review and consider submissions received as part of the Public Comment Period. The Draft Report can be viewed here: www.asa.gov.au/projects/osborne-submarine-construction-yard-environmental-approvals

The Draft Report outlines proactive measures to mitigate impacts to Protected Matters and includes findings from environmental assessments to better understand the surrounding environment.

During this period, the ASA will host community drop-in sessions where you can talk to members of the ASA Project Team, ask questions and learn more about the Draft Report. Please register your interest to attend one of the community drop-in sessions. You can register and find more details about session dates and times on our website.

Hard copies of the Draft Report are available for review at Port Adelaide Library (2-4 Church St, Port Adelaide) during the Public Comment Period.

For further information, including access for persons with special needs or assistance in accessing the material, please contact the ASA:

asa.osborne.enquiries@defence.gov.au

1800 DEFENCE (1800 333 362)



Scan for more details

EIS Community Drop-In Session Images:



LeFevre Community Centre



Port Adelaide Plaza



State Library Foyer

Submarine Construction Yard

The Submarine Construction Yard is proposed to be built at a preferred site in Osborne, 19kms north of Adelaide, on the north-eastern side of the Lefevre Peninsula.

It will be built adjacent the existing Osborne Naval Shipyard, which is the most advanced and modern shipbuilding hub in Australia, and is owned and managed by Australian Naval Infrastructure (ANI).

The site is divided into three areas, consisting of:

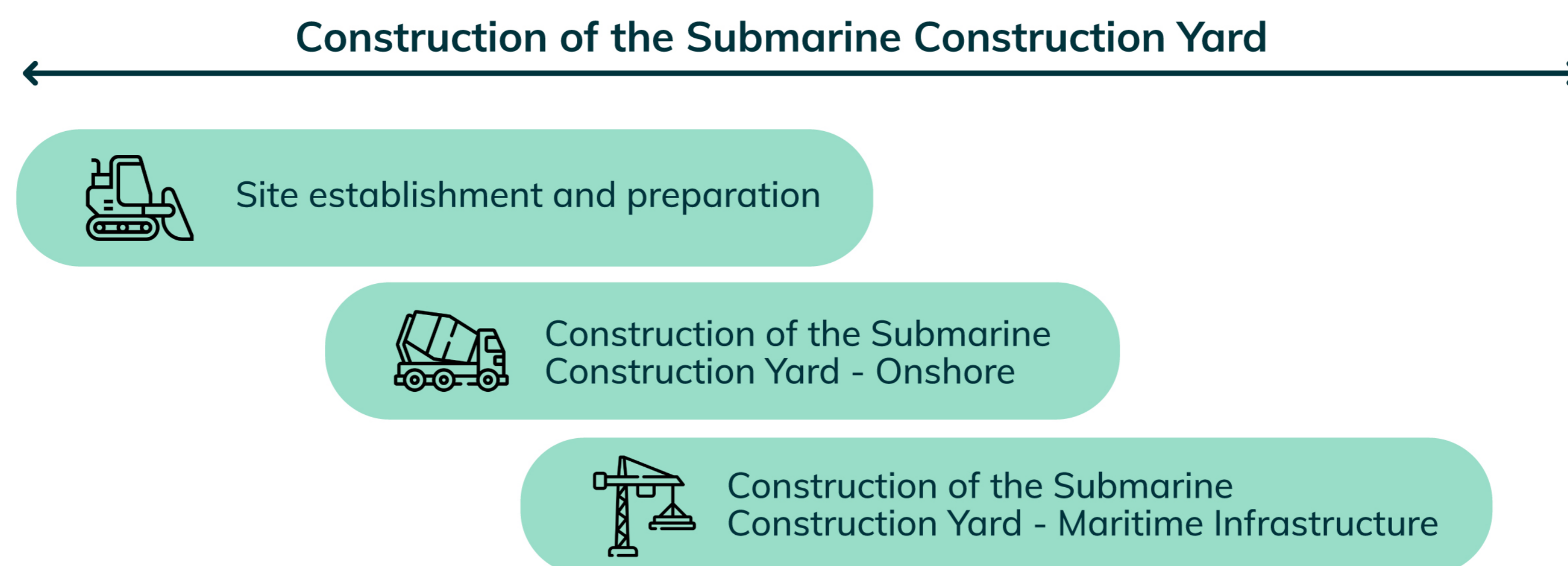
- › Submarine fabrication (Area 1) which includes buildings and workshops to manufacture submarine components.
- › Submarine outfitting (Area 2) which includes buildings used to fit out the submarine sections.
- › Submarine consolidation, launching, testing and commissioning (Area 3) which includes a launch facility and wharf.



Submarine Construction Yard

Construction of the yard is expected to take more than a decade with works starting in 2025, and completed in three phases.

- › Site Establishment and Preparation Works - This involves site establishment works, bulk earthworks and services to make the site ready for construction and includes excavation, piling, services and drainage.
- › Onshore Construction - This involves construction of onshore infrastructure (such as services, roads and carparks, lighting, security, submarine launch facility, wet basin and wharf) and buildings (such as warehouses, offices, commercial canteen, health centre and other amenities).
- › Marine Construction - This involves construction of maritime infrastructure within the Port River and includes dredging and hardening the edges along the waterfront of Area 3.



Submarine Construction Yard Master Plan

More than 50 buildings will be on the site providing a range of manufacturing and associated activities including fabrication, welding, painting, abrasive blasting, warehousing, storage, assembly and testing, general workshop operations and component fit out.



Impact Assessed Development

The Impact Assessed pathway is the most rigorous level of development assessment in South Australia. It is reserved for major projects of economic, social or environmental importance to the State.

A key component of the Impact Assessed process is the preparation of an Environmental Impact Statement which addresses the expected environmental, social and economic impacts and effects of the proposed development.

The Environmental Impact Statement has now been prepared by Australian Naval Infrastructure for the Osborne Submarine Construction Yard.

As part of the process, an Environmental Impact Statement is required to be made publicly available for 30 business days to ensure the community have an opportunity to understand and comment on what is proposed.

Following public consultation, ANI will prepare a formal response document. The State Planning Commission will then undertake an assessment of the proposal and make a recommendation to the Minister for Planning.



Environmental Impact Statement

The Submarine Construction Yard (SCY) will deliver a significant expansion to the capability and capacity of shipbuilding infrastructure on the Lefevre Peninsula, and more broadly bring significant social, environmental and economic benefits to South Australia, including:

- › At least \$2 billion invested in infrastructure in South Australia.
- › Significant local employment opportunities with up to 4,000 Australian workers employed to design and build the infrastructure for the SCY in Osborne and a further 4,000-5,500 direct jobs created to build nuclear-powered submarines in South Australia.
- › Local community and business benefits such as increased property values, upgraded roads, public transport, public spaces, schools, health facilities and retail services.
- › Environmental measures that contribute to biodiversity, habitat and species protection.

ECONOMIC AND EMPLOYMENT BENEFITS

Nuclear-powered Submarine Construction
Design and build infrastructure at Osborne Naval Shipyard over four years

Up to **4000** Workers

\$2bn Programs

At least \$2 billion invested in infrastructure in South Australia.

At its peak, up to 4,000 Australian workers employed to design and build the infrastructure for the SCY in Osborne.

Significant employment opportunities
Program will create about 20,000 Australian Jobs over the next 30 years (not including tier two and three supply chain).

4000 → **5000**
A further 4,000-5,500 direct jobs created to build nuclear-powered submarines in South Australia when the program reaches its peak.

Jobs include

- › Engineers
- › Technicians
- › Scientists
- › Tradespeople
- › Administrators

20,000 Australian Jobs

Environmental Impact Statement

Overall, the Environmental Impact Statement identifies that the Submarine Construction Yard will have no significant effect on:

- › Air Quality
- › Vibration
- › Visual Amenity
- › Biosecurity
- › Marine Flora and Fauna
- › Terrestrial Flora and Fauna
- › Climate Change Adaption
- › Green House Gas Emissions
- › Waste Management
- › Flooding
- › Contamination
- › Coastal and Marine interface
- › Surface water and Groundwater
- › Aboriginal Cultural Heritage
- › Community Wellbeing
- › Heritage Places and Areas

Three residual significant effects, which are those effects that remain following the implementation of mitigation measures, have been identified, namely:

Local, Regional and State Economies

There are significant long- and short-term benefits to the South Australian economy through construction and operation of the development, however to maximise these, the Environmental Impact Statement identifies the need for the development's skilled labour and land requirements to be considered.

To address this, the Commonwealth and South Australian Government are working collaboratively to develop a new Skills and Training Academy at Osborne, increase university places targeted at STEM disciplines as well as a range of other measures to grow the submarine and naval shipbuilding workforce including developing skills required for the construction of the SSN-AUKUS nuclear-powered submarines.

Operational Traffic and Traffic Noise

During operation of the Submarine Construction Yard, traffic generated by the development workforce in combination with other planned growth on the Lefevre Peninsula, is expected to increase and has the potential to exceed the capacity of certain existing roads in the area if appropriate management strategies are not adopted. Traffic impacts generated by operations will not be felt for some time and therefore there are significant opportunities to plan for this change.

The Environmental Impact Statement recommends that traffic and transport options be progressed in partnership with government agencies and organisations to increase capacity to cater for this additional demand and consider operational measures to reduce traffic generation.

It is expected that potential impacts from traffic noise can be minimised through the involvement of the Department for Infrastructure and Transport and other stakeholders in the Lefevre Peninsula Master Plan process.

Construction Noise

During construction, the Environmental Impact Statement identifies that nearby properties could experience short-term noise effects during the daytime, however this is manageable within acceptable limits and expected for a development of this size and scale.

During operation of the Submarine Construction Yard, noise levels are predicted to comply with relevant criteria for plant and equipment.

Important Community Issues

Adelaide Dolphin Sanctuary

The Port River and surrounding marine area includes the Adelaide Dolphin Sanctuary which is protected under the Adelaide Dolphin Sanctuary Act 2005 and managed by the Adelaide Dolphin Sanctuary Draft Management Plan 2024. The objectives of the Act and Sanctuary are to protect the dolphins in the Port River and Barker Inlet area and to protect the habitat on which they rely.

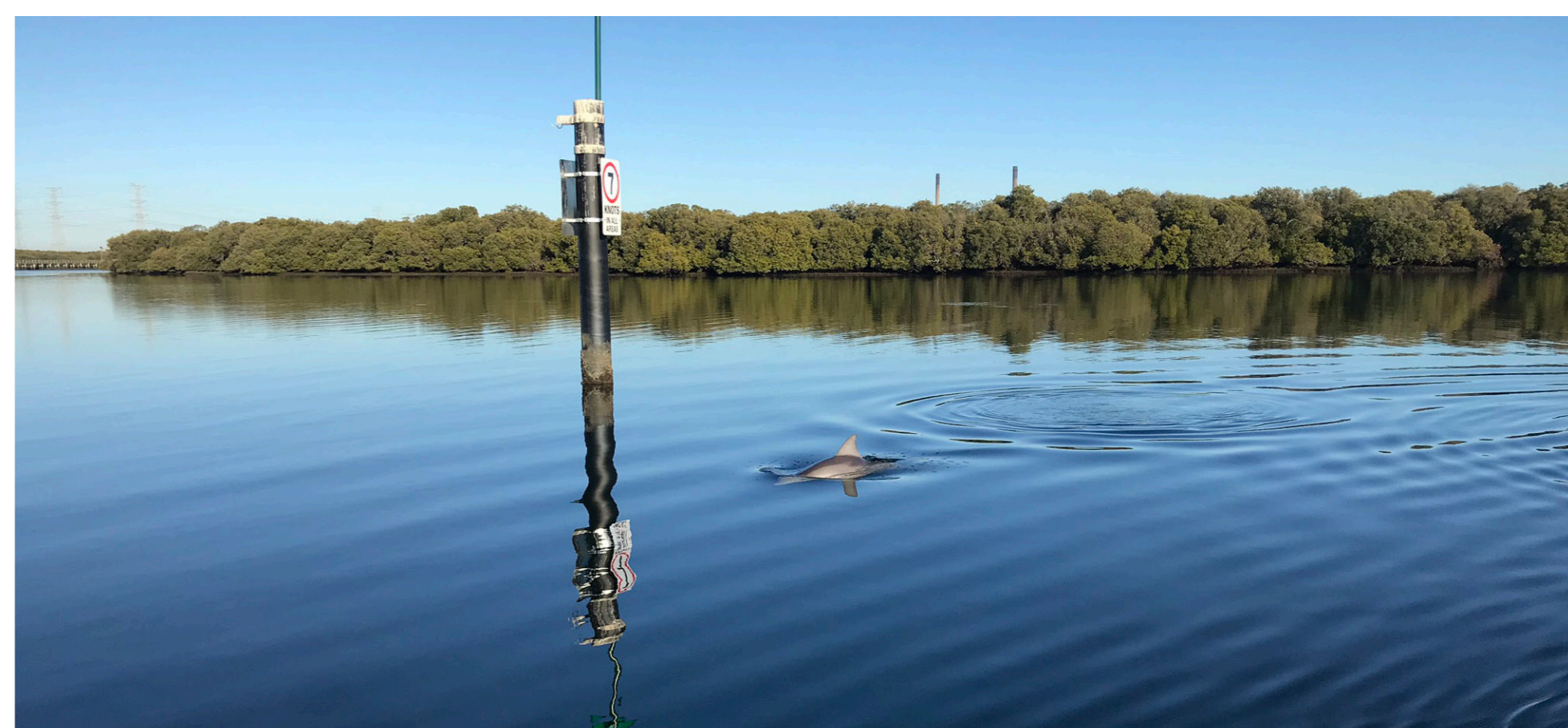
Specific consideration has been given to the Adelaide Dolphin Sanctuary and protection of the Indo-Pacific bottlenose dolphins (*Tursiops aduncus*) in the Environmental Impact Statement.

The area impacted by the development is extremely small in the context of the entire Adelaide Dolphin Sanctuary. This area is approximately 11,800ha in total, representing just 0.1% of the total area of the Sanctuary. This part of the Sanctuary is also a highly modified habitat in that it is used as South Australia's main shipping port and is exposed to human impacts, marine traffic, noise, light spill and stormwater pollution on a daily basis.

Impacts to the local population of Indo-Pacific

bottlenose dolphins and other dolphins from construction activities will be a combination of direct (habitat removal) and indirect effects (turbidity, sedimentation, noise, vibration, water quality). Impacts from operation of the site will be more limited, including a combination of direct (lighting) and indirect (noise, water quality) from site maintenance and management operations.

Impacts will be managed through a range of mitigation measures including a Marine and Coastal Environmental Management Plan, a Storm Water Management Plan, a Biosecurity Management Plan and a Dredge Management Plan.



Protected Areas and Mutton Cove Access

There are a number of protected areas and important areas of open space in or near the development site, including.

- › Torrens Island Conservation Park – lies across the Port River from the development site and is protected under the NPW Act and ADS Act.
- › Barker Inlet - St Kilda Wetland – lies within the marine based portion of the development site and is protected under Ramsar Convention and EPBC Act.
- › Mutton Cove Conservation Reserve – lies adjacent the development site and is protected under Crown Land Management Act and ADS Act.
- › Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara.
- › Biodiversity Park, Falie Reserve and Kardi Yarta.
- › Port Gawler and Buckland Park Lake.

Potential effects on protected areas and open spaces include the impacts of vegetation clearance, noise, light, air quality, contamination events, stormwater runoff, vehicle movements, excavation, restricted access, litter, and increased human activity.

All impacts will be managed through a range of mitigation measures including a Terrestrial Flora and Fauna Management Plan, a Storm Water Management Plan, a Biosecurity Management Plan and a Dredge Management Plan.

Publicly accessible areas

Changes to publicly accessible areas, including Mutton Cove, Falie Reserve and the Snapper Point carpark, should be anticipated with the development of the Submarine Construction Yard.

Opportunities for public access to these areas will be confirmed once the site is fully operational. Public access will be subject to site security and license requirements under the Australian Radiation Protection and Nuclear Safety Act 1998 and the Australian Naval Nuclear Power Safety Act 2024 as well as general public safety requirements.

Important Community Issues

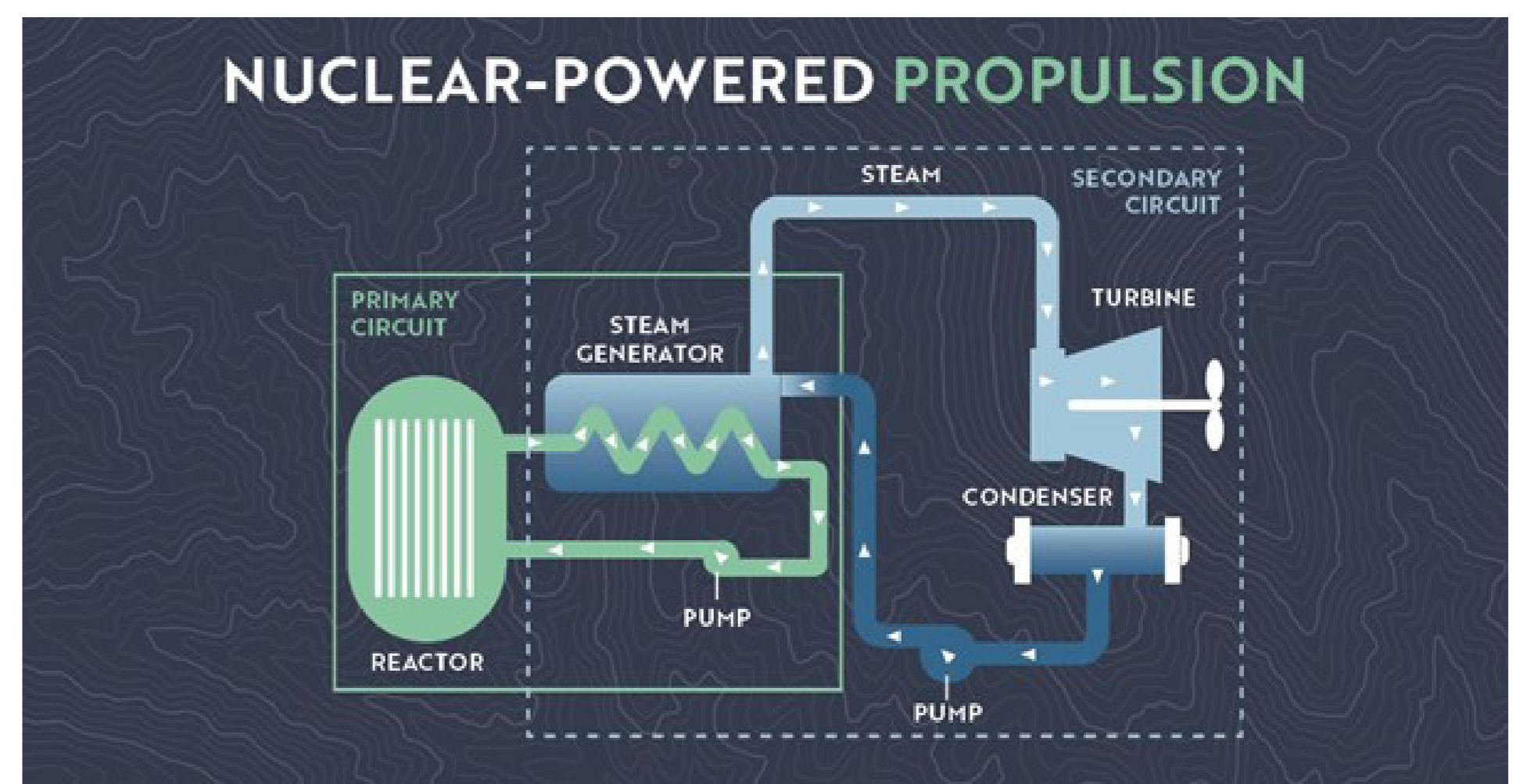
Nuclear-Powered Propulsion System

The nuclear-powered propulsion systems for the submarines will be delivered to the development site as a fully manufactured and sealed package that is dry and inert.

At the development site the system will be stored inside a purposely constructed, safe and secure area until the submarine is ready to have the propulsion system installed in its hull.

It is anticipated the submarine construction, test and commissioning activities planned for Osborne will generate small amounts of low and very low level radioactive waste. This will comprise waste like personal protective equipment, such as gloves, and materials including wipes, rags and plastic bags, which is similar to the waste generated by hospitals and research facilities around Australia.

This low-level radioactive waste will need to be managed and temporarily stored in a licenced facility at the Osborne Submarine Construction Yard, in accordance with regulatory requirements.



Operational Traffic and Traffic Noise

During operation of the Submarine Construction Yard traffic generated by the development workforce in combination with other planned growth on the Lefevre Peninsula is expected to increase and has the potential to exceed the capacity of certain existing roads in the area and also increase road traffic noise if appropriate management strategies are not adopted.

There are a range of mitigation options that could reduce these impacts:

- › Road infrastructure upgrades: Upgrade the existing road network to suitably accommodate the demand.
- › Public transport: Establish new or enhanced public transport services (rail and/or bus) to the precinct to reduce the private car transport demand.
- › Car park and dedicated ANI precinct services: Provide dedicated services for ANI precinct staff (bus or train) which could include off-site car parks, to enable simple and effective transfer from car to dedicated public transport service.
- › Operations: Changes to workforce demand, shift allocations and start and finish times and on-site car parking facilities.

The optimal solution is likely to be a combination of the above approaches is considered likely to provide the optimal solution.

Traffic impacts generated by operations will not be felt for some time and therefore there are significant opportunities to plan for this change.

The SA Government has committed to the preparation of the Lefevre Peninsula Master Plan, which will ensure opportunities arising from the project can be maximised, including opportunities for improved public infrastructure.

In addition, to support the development of this region, the Department for Infrastructure and Transport (the Department) is already upgrading transport infrastructure in the area with a \$100 million commitment to road and rail infrastructure improvements jointly funded by the South Australian and Australian governments (50:50).

www.dit.sa.gov.au/infrastructure/road_projects/LefevreUpgradeProject

More Information

You can view the Environmental Impact Statement Report and supporting documents by scanning the QR code below:



Or visit the YourSAy website: www.yoursay.sa.gov.au/submarine-construction-yard-eis

A hard copy is also available to view at:

- › Planning and Land Use Services – Level 9, 83 Pirie Street, Adelaide
- › Port Adelaide Library – 2-4 Church St, Port Adelaide

You can talk to a member of the project team at a community drop-in session at the following dates, times and locations:

- › 11.30am-1.30pm, Wednesday 19 February 2025, State Library, Cnr North Terrace & Kintore Ave, Adelaide
- › 5pm-7pm, Thursday 20 February 2025, Port Adelaide Plaza, 200-220 Commercial Road, Port Adelaide
- › 1pm -3pm, Friday 21 February 2025, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne
- › 1pm-3pm, Saturday 22 February 2025, Function Room, Lefevre Community Stadium, 514 Victoria Road, Osborne.

If you have any questions about the Environmental Impact Statement process you can contact PlanSA on 1800 752 664 or email PlanSA@sa.gov.au

For further information about the Submarine Construction Yard visit www.ani.com.au/nuclear-powered-submarine-construction-yard

Have Your Say

We would like to hear your views on the Environmental Impact Statement Report which is available for public feedback from **Monday 3 February to Monday 17 March 2025**. During this time you can lodge a written submission about any aspect of the Report.

You can provide your feedback in the following ways:

- › via our online survey at www.yoursay.sa.gov.au/submarine-construction-yard-eis
- › by completing the PlanSA submission form at www.plan.sa.gov.au/have_your_say/notified_developments/state_developments
- › by email: SPCreps@sa.gov.au with “Submarine Construction Yard EIS submission” in the subject line

› in writing, addressed to:

Attention Robert Kleeman
Manager Crown and Impact Assessment
Planning and Land Use Services
Department for Housing and Urban Development
GPO Box 1815, Adelaide SA 5000.

All submissions will be published on the PlanSA and YourSAy websites.

Translation Services

If you require translation services to help you understand this information, please contact:

- › Australian Government Translating and Interpreting Services: 13 14 50
- › South Australian Government Interpreting and Translating Centre: 1800 280 203.

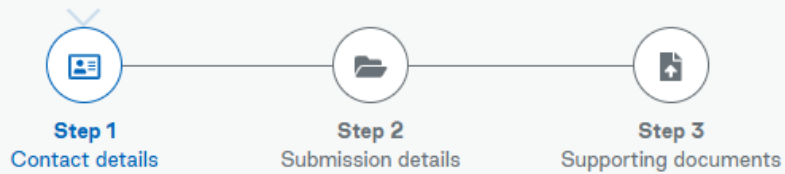
Next Steps

Your feedback will be important in developing ANI’s Response Document. The State Planning Commission will also consider your input when making a recommendation to the Minister for Planning. The Minister’s final decision will be published on the PlanSA and YourSAy websites.

Appendix B – PlanSA Form

EIS SUBMISSION FORM

Public comments are now invited from the community on this proposed development. Your feedback will inform the assessment of the development by the State Planning Commission.



! **A representation that has been confirmed to be 'valid' is provided to the proponent at the conclusion of the public notification period and may be made publicly available.**

Contact Details

Name*

Daytime Phone*

Please enter a phone in format of 0412345678 or 0812345678

Email*

Postal Address*

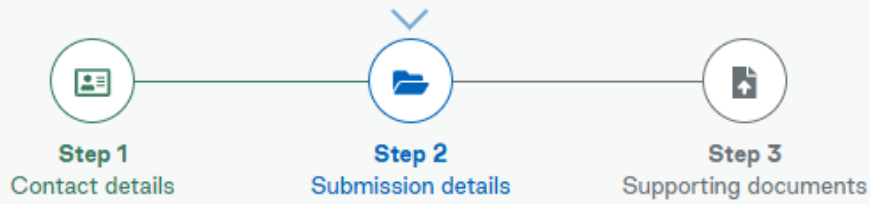
Affected property

(if different from postal address)

*The contact details you have provided will be used to clarify your representation (if required) and to notify you of the decision outcome.

Next Step →

Public comments are now invited from the community on this proposed development. Your feedback will inform the assessment of the development by the State Planning Commission.



Submission Details

I am*

- an owner of local property
- an occupier of local property
- a representative of a company/other organisation affected by the proposal
- a private citizen
- other

My position is*

- I support the development
- I support the development with some concerns
- I oppose the development
- neutral

Do you have concerns regarding the proposed development?

What could be done to address your concerns?

Other general comments

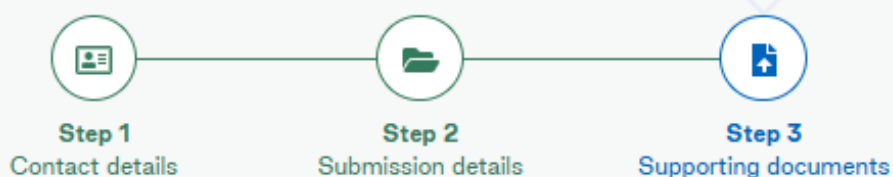
Would you like to present your submission in person at a hearing?

- I do not wish to be heard in support of my representation**
- I wish to be heard in support of my representation**

*You may be contacted if you indicated that you wish to be heard by the relevant authority in support of your representation

← Previous	Next Step →
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Public comments are now invited from the community on this proposed development. Your feedback will inform the assessment of the development by the State Planning Commission.



Supporting documents

Uploading documents


Use this section if you want to attach supporting documentation to your submission.

- select up to 5 files
- pdf, doc, docx, png, jpg or jpeg file types only permitted
- maximum combined file size of 25MB
 - should your files be larger than the maximum, please contact spcreps@sa.gov.au

Choose File	No file chosen
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Choose File	No file chosen



A representation that has been confirmed to be 'valid' is provided to the proponent at the conclusion of the public notification period and may be made publicly available.

<input type="checkbox"/>	I'm not a robot	 reCAPTCHA Privacy - Terms
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Confirm you are not a robot

← Previous	Submit →
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Appendix C – YourSAy Survey

Survey: Nuclear-Powered Submarine Construction Yard Project

Environmental Impact Statement

You are invited to share your views on the Environmental Impact Statement regarding the proposed development of a nuclear-powered submarine construction yard at Osborne.

This survey should take approximately 5-10 minutes to complete depending on the level of detail you would like to provide in your answers.

Name:

Email address:

Postal address (optional):

1. Interest in the development:

- Local community member
- Local business/property owner
- Interested individual
- Special interest group
- Local government
- State agency
- Non-government organisation
- Represent a company or organisation affected by the proposal
- Member of Parliament
- Other (please specify)

2. Do you support the proposed development:

- I support the development
 - I support the development with some concerns
 - I feel neutral towards the development
 - I oppose the development
-

3. What potential issues (positive or negative) does your feedback relate to:

- Local amenity and wellbeing
 - Marine (in water) ecosystems
 - Terrestrial (on land) ecosystems
 - Existing businesses and industries
 - Climate change and sustainability
 - Local and/or state economy
 - Transport and traffic
 - Water quality
 - Culture and heritage
 - Waste storage
 - Other (please specify)
-

4. Being near Adelaide's existing naval manufacturing precinct and other maritime and export related businesses was a key consideration in site selection. Do you have any feedback on how the proposal may interact with nearby businesses and/or those who live and work on the Le Fevre Peninsula?

5. The proposed nuclear powered submarine construction yard is located near the Port River and a number of protected areas, including Mutton Cove Reserve and the Adelaide Dolphin Sanctuary. Do you have any feedback on how the proposal may interact with water and/or land-based environments, such as impacts to plants, animals or important habitats?

6. The proposed nuclear powered submarine construction yard will generate additional traffic movements and require new or expanded services to support its construction and operation. Do you have any feedback on how the proposal may affect existing service levels or social and community infrastructure?

7. The proposed nuclear powered submarine construction yard is expected to create thousands of jobs during the design, construction and operational phases of the project. Do you have any feedback on the economic benefits or challenges the development could have on the local Port Adelaide community, Adelaide Metropolitan area or South Australia more generally?

8. The nuclear-powered submarine propulsion systems are not made in Australia. They would be delivered from overseas as a fully constructed, sealed unit to the Osborne facility. Following delivery, the inactive units would be securely stored for a short time before installation, testing and commissioning processes are undertaken, prior to delivery to the Royal Australian Navy. Do you have any feedback on how the nuclear-powered propulsion systems are managed?

9. Do you have any other feedback or information about the proposed nuclear powered submarine construction yard and the Environmental Impact Statement that you would like to share?

Thank you and next steps

Thank you for completing this survey and sharing your feedback. Your feedback will be provided to ANI for their consideration and review.

ANI will then prepare a “response document”, which outlines the feedback received, addresses issues raised during consultation (including mitigation and management measures) and outlines any changes to the project.

The State Planning Commission will then consider the whole proposal, including the Environmental Impact Statement, council and state agency comments and public feedback, and prepare an assessment report.

The Commission will provide the assessment report with recommendations to the Minister for Planning for consideration in making a decision on the proposal.

Outcomes from the consultation will be posted on the YourSAy and PlanSA websites.

If you would like to be kept informed about the outcomes of this consultation, please provide your email address:

Appendix D – Response to Agencies

Aboriginal Affairs and Reconciliation

AAR comment	Proponent/technical subconsultant response
<u>Main Letter</u>	
<p>AAR confirms the risk of discovering Aboriginal heritage during the Project is assessed as low, as stated in Integrated Heritage Services' Aboriginal Heritage Desktop Assessment (IHS Assessment), of which AAR has been provided with a copy.</p>	<p>Response: Thank you for the confirmation.</p>
<p>The EIS confirms, and AAR accepts as appropriate, that the Project's Construction Environment Management Plan (CEMP) will embed strategies and procedures to ensure parties understand their legal obligations under the <i>Aboriginal Heritage Act 1988 (SA)</i> in the event of unexpected discoveries of Aboriginal heritage during construction.</p>	<p>Response: Thank you for the confirmation.</p>
<p>AAR refers to its previous advice dated 11 June 2024, which followed a meeting with Planning and Land Use Services and URPS on behalf of ANI, stating early and ongoing engagement with Aboriginal stakeholders should be integral to the EIS process.</p>	<p>Response: The Proponent acknowledges and has accepted AAR's previous advice regarding early and ongoing engagement with Aboriginal stakeholders as an integral part of the EIS process. As outlined in the EIS, the Proponent, in partnership with ASA, has commenced ongoing engagement with Kurna, focusing on project design and delivery, as well as broader opportunities and outcomes for Aboriginal people beyond the requirements of the AH Act. This approach ensures that Aboriginal engagement remains embedded in the project from its early stages through to implementation.</p>
<p>AAR's recommendation, included in the Standard Assessment Requirements, was that an Aboriginal Engagement Plan should be prepared to include steps that will be taken to facilitate meaningful and effective consultation with identified Aboriginal stakeholders throughout Project design, delivery, and operations.</p>	<p>Response: The EIS process is the highest level of assessment under the <i>Planning, Development and Infrastructure Act 2016 (PDI Act)</i> and ensures that planning decisions are made holistically, considering the likely significant effects and incorporating input from statutory agencies, stakeholders, and the public.</p> <p>The Proponent acknowledges AAR's recommendation regarding the preparation of an Aboriginal Engagement Plan (AEP) and recognizes the importance of</p>

	<p>meaningful engagement with Aboriginal stakeholders. Given the extensive consultation requirements of the EIS process, Aboriginal engagement was integrated into the overarching Engagement Plan, which addresses the requirements outlined by AAR (EIS, p. 365).</p> <p>The Proponent remains committed to ongoing engagement and acknowledges that an AEP will be particularly valuable during the construction and operational phases. Accordingly, the Proponent supports a condition requiring the preparation and implementation of an AEP post-approval to ensure continued consultation with Aboriginal stakeholders throughout the final design, delivery, and operation of the project.</p>
<p>AAR notes that an Aboriginal Engagement Plan has not been developed to date, and that the EIS states at page 365 that Aboriginal engagement is included in the general Engagement Plan, which is not included with the EIS.</p>	<p>Response: Please refer to response above.</p>
<p>AAR supports the consultation ANI in partnership with the Australian Submarine Agency that has commenced with Kaurua for the project; however, AAR reiterates its advice about the importance of engagement with Aboriginal stakeholders, both in acknowledgement of the general cultural significance of the area, as outlined in the IHS Assessment, and more broadly in relation to Community wellbeing and social license.</p>	<p>Response: The Proponents notes the AAR position. Please refer to the comments above regarding the Engagement Plan for the EIS and the proposed commitment to prepare a AEP post-approval for the final design, delivery and operation phases of the development, which would be secured by planning condition.</p>
<p><u>EIS Referral Comments</u></p>	
<p>AAR accepts the proposition in the EIS that protocols in the event of unexpected discoveries of Aboriginal heritage will be embedded in the Construction Environment Management Plan rather than being incorporated into the EIS.</p>	<p>Response: Thank you for the confirmation.</p>
<p>Early and ongoing engagement with Aboriginal stakeholders remains highly desirable to the development given the cultural importance of the area, as outlined in the IHS report. This is also important from a social licence perspective and is relevant to SC2 given the large numbers of Aboriginal people residing in the area.</p>	<p>Response: The Proponents notes the AAR position. Please refer to the comments above regarding the Engagement Plan for the EIS and the proposed commitment to prepare a AEP post-approval for the final design, delivery and operation phases of the development, which would be secured by planning condition.</p>
<p>AAR recommends a demonstrated commitment to engage with Aboriginal stakeholders ideally through an Aboriginal Engagement Plan</p>	<p>Response: The Proponents notes the AAR position. Please refer to the comments above regarding the Engagement Plan for</p>

developed for this purpose, or alternatively strategies to ensure appropriate engagement and information sharing with relevant Aboriginal stakeholders during the design, delivery and operation of the development incorporated into the general Engagement Plan.

the EIS and the proposed commitment to prepare a AEP post-approval for the final design, delivery and operation phases of the development, which would be secured by planning condition.

Department for Environment and Water

DEW comment	Proponent/technical subconsultant response
<p><u>Noise / Vibration</u></p> <p>More detail is needed about mitigating the impacts of noise and vibration on whales and dolphins.</p>	<p>Response: We acknowledge DEW’s request for more detail on mitigating noise and vibration impacts on whales and dolphins.</p> <p>The EIS has included a detailed assessment of potential impacts on marine fauna, using the best available information at the time of submission and adopting a conservative worst-case assessment for construction methods. A comprehensive underwater noise assessment was conducted as part of the EIS (Section 5.7 of Appendix 1.2: Noise and Vibration), which evaluates noise impacts on marine fauna. We would like to reiterate that the Port River is not a quiet or noise-free environment. As outlined within Appendix 1.2: Noise and Vibration, the underwater baseline noise primarily consists of snapping shrimp sounds, overlaid with continuous low-frequency mechanical noise (<250 Hz). This background noise is often masked by vessel traffic, which is significant and occurs 24/7. Vessels typically traverse the centre of the channel and produce source levels ranging from 150 to 175 dB re 1 µPa² at 1m, which is comparable to the sound levels for aircraft taking off.</p> <p>The impact of noise on marine mammals, including resident and transient dolphins and whales, is assessed in Chapter 12: Marine Flora and Fauna (Chapter 12), following standard EIA methodology outlined in Chapter 6: Impact Assessment Methodology (Chapter 6). The assessment, informed by baseline conditions in the Port River, concludes that effects will be short-term and minor adverse, which are not significant and can be appropriated managed as has been done</p>

	<p>during the construction works for the extension of the wharf at the existing ONS facility.</p> <p>To ensure appropriate mitigation, Construction Environmental Management Plans (CEMPs) and Dredge Management Plan (DMP) for marine works will be developed as part of the dredging licence application or construction approvals process. These CEMPs and DMP will specify mitigation measures and strategies and procedures for managing potential impacts on marine fauna, incorporating best-practice measures.</p> <p>As discussed in the workshop meeting on 27 February 2025, further assessment and approvals will be undertaken and submitted to the EPA as part of the dredging and disposal licence application under the <i>Environment Protection Act 1993</i> (the EPA Act). The requirement for a dredging licence application will be a reserved matter in the development approval, and detailed mitigation measures will be provided to the EPA and DEW at that stage as part of the CEMP and DMP.</p>
<p>With regard to noise and vibration impacts on marine mammals, it is noted that efforts will be made to avoid piling and dredging during whale season.</p>	<p>Response: The final construction program will be determined once the detailed design is finalised. As noted, efforts will be made to avoid piling and dredging during whale season where feasible. The CEMPs/DMP will outline specific mitigation measures and strategies to ensure best-practice environmental management throughout the construction phase.</p>
<p>Whale season is from May – October, however there are records of Southern Wright Whales in the Port River across many whale seasons (most recently August 2023).</p>	<p>Response: We acknowledge the comment regarding whale season from May to October and the recorded presence of Southern Right Whales in the Port River. However, it is important to note that whale occurrences within the Port River are rare and not the norm. While occasional sightings have been recorded, including in August 2023, the Port River is not recognised as a key habitat or migration corridor for Southern Right Whales or other whale species. The EIS has assessed potential impacts on marine mammals, including whales, within the context of baseline conditions, concluding that effects will be short-term and minor adverse. Mitigation measures will be incorporated into the CEMPs</p>

	<p>and DMPs to further minimise potential impacts during construction.</p>
<p>Adelaide Dolphin Sanctuary (ADS) dolphins are known to breed over summer months so extra caution may need to be taken if undertaking marine construction in November – April if newborn calves are in the vicinity (National Parks and Wildlife Rangers will be able to advise of the presence of newborn calves at the time works are undertaken).</p>	<p>Response: We acknowledge the comment regarding the breeding season of ADS dolphins, particularly the potential presence of newborn calves from November to April. The Proponent understands the importance of exercising extra caution during this period to protect marine fauna given that the existing ONS facility has been operating for many years and undergone numerous upgrades without incident during this period. The Proponent has demonstrated a strong commitment to being a good neighbour to the ADS and the dolphins. While this project will expand the shipbuilding facilities on the peninsula, it is important to recognize that the Proponent is unlikely to jeopardize the social license it has worked hard to establish since 2010.</p> <p>As previously outlined, once final design and construction methods are known, the CEMPs/DMPs will be prepared to include specific strategies to monitor and address potential impacts on the dolphins, including provisions for consulting with National Parks and Wildlife Rangers to confirm the presence of newborn calves before and during construction activities. These measures will ensure that construction activities are undertaken in a way that minimizes disturbance to the dolphins and their calves.</p>
<p>Page 105 of the Noise and Vibration Technical Report states that ‘However, bubble curtains may not be as effective in shallow water, and care is required in these situations so as not to overprescribe expected attenuation performance. At this stage, we envisage that a bubble curtain is unlikely to be reasonable and practicable. However, the merits of utilising a bubble curtain are expected to be assessed while preparing the construction noise and vibration management plan’. Given that the piling activity is occurring within the ADS, in a location dolphins are known to reside, DEW considers that all possible measures must be taken to mitigate the noise impact from piling on the dolphins. Specifically, the use of bubble curtains should be prioritised, even if their implementation may be more challenging or require additional resources. Additionally,</p>	<p>Response: We appreciate the concerns raised and understand the importance of ensuring robust mitigation measures for marine mammals, including dolphins within the ADS. It appears there may have been a misunderstanding regarding the intent behind the quoted text.</p> <p>To clarify, the discussion around the effectiveness of bubble curtains was not meant to exclude their use during construction or as a mitigation measure. Rather, it was included to explain why bubble curtains were not factored into the noise modelling for the assessment. This decision was made to ensure the assessment reflected a reasonable worst-case scenario, as incorporating bubble curtains in the modelling could have resulted in an</p>

DEW advises the use of silt curtains for the minor dredging works proposed, in order to reduce turbidity and protect water quality, which aligns with Objective 3 of the Adelaide Dolphin Sanctuary Act 2005 (ADS Act) (improving water quality). Taking these precautionary steps will help minimise disturbance to the dolphins and their habitat. Providing more detail about what practical measures will be undertaken to minimise impacts on whales and dolphins should be provided to address AEQ2 dot point four 'describe what reasonable and practicable measures will be taken to minimise vibration impacts on sensitive receivers, including marine mammals...'.

overly optimistic prediction of noise attenuation.

As previously outlined, once final design and construction methods are confirmed, the CEMPs/DMPs will be developed to include targeted strategies for managing and monitoring potential impacts on dolphins. This will include assessing the feasibility of using bubble curtains and silt curtains, in line with best-practice environmental management.

Additionally, it is worth noting that similar works have recently been undertaken at the existing ONS as part of the Common User Facility Marine Development (CUF) Works, which included a wharf extension. The mitigation measures applied to those works are expected to be broadly comparable to those proposed for this project, which were reviewed and agreed with by agencies. The Proponent remains committed to working collaboratively to ensure that effective and practicable measures are implemented to protect the marine environment.

The primary concern in relation to the adjacent State Heritage Places is physical impact due to vibration. Vibrations are addressed in Appendix 1.20 of the EIS and DEW is satisfied that the EIS addresses the Assessment Requirement and the approach to monitoring and managing vibration impacts to surrounding State Heritage Places is supported.

Response: Thank you for confirming.

Biosecurity

While Government and Defence Vessels are exempt from a Ballast Water Management Plan and Certificate Requirements, DEW considers it would be good practice to implement biofouling management for Defence and Government Vessels even if such measures are not required under existing legislation.

Response: Noted. The EIS has considered the potential for biofouling accumulation during the fit out of the submarine. However, this is not considered a significant risk or impact, as the Royal Australian Navy adheres to comprehensive biofouling management protocols that minimize hull fouling during fit-out and commissioning. These protocols, which will be integrated into the Biosecurity Management Plan (BMP) for the Operational Environmental Management Plan (OEMP), ensure that hull antifouling coatings are maintained in optimal condition to minimize biofouling growth while the submarine is in the water during commission and fit out.

	<p>As the submarine would be launched directly into the Port River, any biofouling that has accumulated on the hull would only have been exposed to Port River waters. Therefore, any in-water cleaning required (such as hull grooming or macrofouling removal) would not introduce new biofouling or invasive species into the Port River. The in-water cleaning process will not change the baseline conditions, nor will it increase the risk of spreading invasive aquatic pests.</p> <p>The development of the OEMP, including the BMP, will be a condition of the development approval. Further consultation on the detailed management plans will be undertaken with relevant agencies, including PIRSA and DEW, at the appropriate time before operation commencing.</p>
<p><u>Marine Flora and Fauna</u></p>	
<p>Assessment Requirement BE2 asks that the potential impact, including cumulative on marine fauna, including the dolphins, be detailed. The EIS does not adequately consider the cumulative impact of dredging projects in the Port River and what impact that might have on the dolphins and their habitat – see PE1 for further details.</p>	<p>Response: Please see cover letter for further information on capital dredging and cumulative assessment.</p> <p>Additionally, Section 6.7 of Chapter 6 provides a detailed explanation of how the cumulative impact assessment was conducted, including the methodology for identifying relevant projects. It is critical to recognize that cumulative impact assessments must be guided by clearly defined parameters, the first of which in the EIS is the temporal scope, specifically, whether a given project will be constructed concurrently with the NPSCY. Without a temporal overlap, direct cumulative impacts cannot occur.</p> <p>In this case, dredging for the marine infrastructure within Area 3 is not expected to take place for at least ten years. Publicly available information indicates that dredging for the Venice Energy project will be completed well before dredging activities associated with this development begin. Given the lack of overlap in timing, there is no potential for cumulative dredging impacts between these projects.</p>
<p>The recently released Adelaide Dolphin Sanctuary Management Plan 2025 should be taken into account and the latest scientific research should be used to better reflect</p>	<p>Response: It is acknowledged that the Adelaide Dolphin Sanctuary Management Plan 2025 (ADSMP) was formally adopted on 15 January 2025. However, the EIS was produced prior to its approval.</p>

<p>potential impacts and consequentially the likely mitigation measures.</p>	<p>That said, the draft version of the ADSMP was reviewed as part of the EIS process and referenced within Table 12.1: Summary of Legislation and Policy of Chapter 12, and its relevant measures were considered and incorporated into the assessment. As a result, the EIS inherently reflects these considerations, and no further updates are considered to be required.</p> <p>Additionally, the development of the CEMPs and DMPs will take the ADSMP into account, ensuring that the latest scientific research and best-practice mitigation measures are incorporated into project implementation</p>
<p>In addition, information about native vegetation clearance associated with the proposed wharf dredging and commentary about cumulative impacts associated with dredging is missing from the EIS.</p>	<p>Response: Please see cover letter regarding cumulative effects and response below that discusses native vegetation clearance.</p>
<p>The Native Vegetation Act 1991 (NV Act) applies to marine vegetation in the Port River that is part of Area 3 of the proposed development (within an existing shipping channel). The Native Vegetation Data Report has not yet been prepared so at this stage the impact on native vegetation is not mapped or known.</p>	<p>Response:</p> <ul style="list-style-type: none"> • Chapter 12: Marine Flora and Fauna (Chapter 12) provides a comprehensive assessment of the baseline marine environment within the subject site, covering approximately 12 hectares of the Port River. • The actual area of the Port River to be affected by construction activities will be significantly smaller, and as such the EIS is a worst case assessment. High-level mapping (Figure 12.2) identifies the primary benthic habitat as sand, with some patches of sparse to moderate density seagrass (i.e., native vegetation), microalgae, and rock ledges. Given the already disturbed nature of the Port River, subject to regular dredging and stormwater inflows, the benthic habitat in the subject site and surrounding area is classified as being a 'Very Low' sensitivity receptor. • The assessment within Chapter 12 identifies only a few small patches of sparse seagrass (see Figure 12.2) and a very limited area of moderate-density seagrass within the marine-based portion of the development site in Area 3. These may require removal to accommodate the development. Additionally, other seagrass beds and potentially fringing

mangroves in the wider Port River could experience indirect impacts due to increased water turbidity. The magnitude of impact from direct seagrass removal, resulting from construction dredging and coastal infrastructure development, is classified as 'High'. However, the magnitude of indirect impacts on seagrasses and mangroves is assessed as 'Very Low,' given that these effects are temporary, short-term, and reversible.

- The assessment within Chapter 12 concludes that the significance of effects from direct removal of seagrass is classified as a Long-term, Minor Adverse Effect, while indirect effects from increased water turbidity are assessed as Short-term, Negligible Effect.

Additionally, even if the final design of the development were available at this stage, which it is not, preparing a Native Vegetation Clearance Data Report (NVCDR) now would be premature and ineffective. The construction of marine infrastructure in Area 3, where potential seagrass removal may be required, is not scheduled to occur for several years. During this time, the baseline condition of seagrass in the area will naturally change, with seagrass coverage potentially expanding, contracting, or shifting due to environmental factors.

Given these natural variations, any NVCDR prepared now would become outdated and require reassessment closer to construction, resulting in unnecessary duplication of effort. The most practical and scientifically valid approach is to undertake the detailed assessment once the final design is confirmed, and a final survey of the seagrass area is completed to determine the actual extent of clearance required.

Furthermore, depending on the final design and the location of seagrass at that time, it is possible that no seagrass removal will be necessary. If this is the case, a Native Vegetation Clearance Permit (NVCP) would not be required at all.

As such, the NVCDR will be undertaken once the final design of the development is

	<p>confirmed, and the extent of seagrass is known. Furthermore, this requirement will be secured as a condition of the development approval, ensuring compliance with regulatory obligations. However, the impact on native vegetation has been fully assessed, given that no more than 12 hectares could be removed from the development, with the existing seagrass only covering approximately 3 hectares of the marine area as shown within Figure 12.2.</p>
<p>DEW acknowledges that the capital dredging is not being considered as part of this EIS and will be subject to separate assessment and licencing in the future.</p>	<p>Response: Please see cover letter that discusses this matter in further detail.</p>
<p>Despite the area proposed for development being highly modified, this marine environment supports resident bottlenose dolphins who have a small home range and do not venture into adjacent areas. The EIS should acknowledge that development here may have a greater impact upon these resident animals with small home ranges. Despite the area being highly modified and industrialised, dolphins are regularly observed feeding and socialising in this area of the river, and any human activities may cause disruptions to these critical behaviours. While it is agreed the overall impact of this development to the ADS is low, it may be of greater consequence to these inner resident dolphins (Newman et al., in prep. Ranging patterns and mortality of an at-risk marine mammal resident to a highly urbanised estuary: Port River SA).</p>	<p>Response: Thank you for confirming DEW’s position that the overall impact of the development on the ADS is considered low.</p> <p>We acknowledge the concern regarding the potential impact on the inner resident dolphins. Chapter 12 of the EIS provides a detailed assessment of the resident bottlenose dolphins, recognizing them as the most sensitive marine fauna receptor within the subject site and surrounding area. To ensure a robust assessment, the sensitivity of all <i>Cetacea</i> using the Port River was benchmarked against the resident bottlenose dolphins.</p> <p>While we recognize that these dolphins may have a defined home range, they are also highly mobile and capable of temporarily relocating in response to short-term disturbances such as dredging and noise. Additionally, the immediate project area represents a small and already highly modified portion of their habitat, with alternative higher-quality habitat available in the broader locality. These factors contribute to the assessment that, despite their national protection status, the overall sensitivity of these receptors remains within the ‘Medium’ category.</p> <p>The EIS has taken these considerations into account, and the forthcoming CEMPs/DMP, will incorporate appropriate mitigation strategies to further minimize potential disturbances to the dolphins and their habitat. The Proponent remains committed to ensuring best-practice</p>

	<p>environmental management throughout the project.</p>
<p>Given that dolphins are particularly vulnerable to cumulative long-term impacts as they are long lived, take a number of years to reach sexual maturity, have few offspring, long gestations and typically take two to three years or longer between giving birth. There is no discussion in the EIS for decision makers to determine why the future dredging was excised from this application. This means that potential impact from that dredging on the marine environment, nor cumulative impacts from other Port River dredging, have been considered in this EIS. Given that future dredging is likely to have the most significant impact on the ADS marine environment and dolphins and that the project depends on the future dredging, the EIS should briefly discuss this risk and also acknowledge the potential for cumulative impacts of future dredging.</p>	<p>Response: Please see cover letter that discusses cumulative impacts in further detail.</p>
<p>DEW considers that additional information on the dredging associated with the wharf area should be provided that indicates how much native vegetation will be impacted and what avoidance and mitigation measures are likely to reduce impacts on the seagrass. DEW acknowledges that the preparation of the Data Report is likely to occur once the final design has been settled but considers that there is enough information available about vegetation in Port River for the proponents to be more specific about the likely impacts on native vegetation.</p>	<p>Response: Please see previous response above that addresses comments regarding native vegetation.</p>
<p>The EIS should also address the risks of development-based sedimentation and silting of the Port River. This includes impacts/challenges of maintenance dredging long-term and dewatering and disposal of contaminated material. And it should consider a consolidated pressure analysis to assess risks to marine species in the Port River complex in addition to cetaceans and pinnipeds. This is important for resident taxa and those that may be seasonally migratory (e.g Sygnathids, Port Jacksons) and others. This could include identifying marine biologically important areas. If not already proposed a Soil Erosion and Drainage Management Plan (SEDMP) with appropriate mitigation measures should be prepared as</p>	<p>Response: Please see cover letter for further information on capital dredging and cumulative assessment.</p> <p>Dewatering and disposal of contaminated material have been assessed in detail within Chapter 19: Contamination and Chapter 16: Waste which informed assessments included within Chapter 12 and Chapter 13: Terrestrial Flora and Fauna.</p> <p>A Soil, Erosion and Contamination Management Plan (SECMP), which will form part of CEMPs for the project, is proposed and has been included as part of the construction phase mitigation measures.</p>

<p>part of the Construction Environmental Management Plan (CEMP), based on the EPA requirements.</p>	
<p>Further section 6.7 Cumulative Effects (page 123) of the EIS does not provide adequate information about the potential cumulative impact of dredging, from this project and others in the area e.g. Venice Energy dredging project, in the Port River on the marine environment and dolphins. And section 12.9 Cumulative Effects under Chapter 12 Marine Flora and Fauna fails to discuss the cumulative impacts associated with dredging projects in the Port River. While DEW understands that the majority of the dredging associated with this project won't be required for at least a decade, it would still be appropriate to make stronger connections between the stages of the project and what that means for cumulative impact on the environment, particularly the ADS.</p>	<p>Response: Please see cover letter for further information on capital dredging and cumulative assessment.</p> <p>Additionally, Section 6.7 of Chapter 6 provides a detailed explanation of how the cumulative impact assessment was conducted, including the methodology for identifying relevant projects. It is critical to recognize that cumulative impact assessments must be guided by clearly defined parameters, the first of which in the EIS is the temporal scope, specifically, whether a given project will be constructed concurrently with the SCY. Without a temporal overlap, direct cumulative impacts cannot occur.</p> <p>In this case, dredging for the marine infrastructure within Area 3 is not expected to take place for at least ten years. Publicly available information indicates that dredging for the Venice Energy project will be completed well before dredging activities associated with this development begin. Given the lack of overlap in timing, there is no potential for cumulative dredging impacts between these projects.</p>
<p>Table 14 page 53 refers to whale season as May – September, it should read May – October.</p>	<p>Response: Noted, and thank you for bringing this to our attention.</p>
<p>See comment in AEQ2 noting that there are records of Southern Right Whales in the Port River across many whale seasons (most recently August 2023).</p>	<p>Response: See previously response on this matter.</p>
<p>Page 41 Appendix 1.6 - Unnecessary italics in table on <i>Stigmatopora nigra</i> "the species".</p>	<p>Response: Noted, and thank you for bringing this to our attention.</p>
<p>Page 111 of the EIS, there is an incorrect reference to the species of bottlenose dolphin in the ADS as <i>Tursiops truncatus</i> it should read <i>Tursiops aduncus</i>.</p>	<p>Response: Noted, and thank you for bringing this to our attention.</p>
<p>Note that the ADS Management Plan has recently been released Adelaide Dolphin Sanctuary Management Plan 2025. Update the EIS accordingly – e.g. table 12.1 page 205.</p>	<p>Response: See previous comment on the ADSMP.</p>

Terrestrial Flora and Fauna

With regard to wildlife (fauna) protected by the South Australian National Parks and Wildlife Act 1972 (NPW Act), little reference is made to fauna other than 'threatened'. Permission is required to interact (i.e. 'Take') with all fauna protected under the NPW Act. The proponent and their contractors should refer to: Department for Environment and Water - Planning for a development.

Response: The EIS excluded non-listed fauna species and communities from detailed assessment on the basis that their populations are not of significant ecological importance due to their size, composition, or lack of threat or rarity.

Any potential impacts on these species would have no discernible effect on their overall range or conservation status at any formal administrative scale in the long term. As such, the development is considered to result in Negligible effects on these species, and further assessment was not deemed necessary.

The Proponent acknowledges DEW's position regarding the protection of fauna under the NPW Act and recognizes that a permit is required to interact with fauna, including activities such as taking, keeping, moving, or relocating animals or their eggs.

The necessary permits will be obtained as required, and any fauna management actions during construction will be incorporated into the CEMPs to ensure compliance with regulatory requirements and best-practice environmental management.

Further, depending on the nature of the land tenure (cf. section 47(1) of the NPW Act), plant protection provisions under the NPW Act may also apply and should be considered – noting the reference in the EIS (page 238 13.7.1) to NPW listed flora not requiring approval. DEW can provide advice about whether approval is required to remove any NPW Act listed flora species as the project progresses.

Response: While the EIS notes that NPW Act listed flora is not expected to require approval for removal, we appreciate DEW's offer to provide further advice as the project progresses. The Proponent remains committed to ensuring compliance with all relevant legislative requirements and will engage with DEW as needed to confirm any necessary approvals for NPW Act listed flora.

Note that the NV Act does not apply to terrestrial vegetation in the development area.

No response required.

In relation to light spill and wildlife the Australian Government has produced a number of fact sheets about the impact of light pollution on Australian wildlife, the fact sheet about impacts of lighting on native Australian mammals provides some useful information about potential impacts and how to avoid them. The Australian Government has also produced the National Light Pollution Guidelines for Wildlife Fact Sheet which provides useful information about how to plan a lighting design to minimise impact on native

Response: The design team is aware of the National Light Pollution Guidelines for Wildlife and the associated fact sheets, and these are being considered in the development of the project's lighting design. As the design progresses, lighting measures will be further refined to align with these guidelines, ensuring that light spill is appropriately managed to reduce potential disturbances to local fauna.

<p>wildlife using 6 best practice lighting principles (the full guidelines document can be found here National Light Pollution Guidelines for Wildlife).</p>	
<p>The regulatory requirements under the NPW Act should be reflected in the EIS.</p>	<p>Response: Section 3.5.10 of Chapter 3 summarises the regulatory requirements of the NPW Act, it states “<i>The National Parks and Wildlife Act 1972 (NPW Act), administered by the Department for Environment and Water provides formal legal recognition for threatened flora and fauna species in South Australia, including those that are endangered, vulnerable or rare.</i></p> <p><i>Relevance</i></p> <p><i>There is potential, albeit low, for threatened fauna species protected under the NPW Act to occur within the development site. Should they need to be locally relocated during the development a permit may be required. So this Act could potentially apply to the development site.”</i> Additionally, Appendix 1.6 Terrestrial and Marine Flora and Fauna Ecological Report and Appendix 1.7 Terrestrial Flora and Fauna Requirements Analysis both outline the regulatory requirements under the NPW Act as required.</p>
<p><u>Climate Change Adaptation</u></p>	
<p>It is positive that the assessment has considered projections for sea level rise and temperature increases out to 2100 and makes reference to development guidance provided by the Coast Protection Board (CPB).</p> <p>EIS page 277 - suggested edit underlined "Given the location <u>of</u> the development site next to the Port River and Gulf St Vincent, it is considered that any additional urban heat effect by cumulative developments will be minimal."</p>	<p>Response: Thank you for confirming, and noted on the omission which will be updated.</p>
<p>The EIS appears to adequately consider relevant policy and legislation.</p>	<p>Response: Thank you for confirming.</p>
<p>Climate impact mitigation measures detailed in the EIS appear to be sufficient.</p>	<p>Response: Thank you for confirming.</p>
<p>EIS Chapter 14 section 14.5.1 talks about the future baseline. This section should refer to the latest guidance in Australian Rainfall and Run off 2024 and use Shared socio-economic</p>	<p>Response: As outlined within Chapter 14. Climate Change Adaption, GHD prepared a climate risk assessment for the construction and operational phases of the development for</p>

pathways (SPP) scenarios for rainfall, rather than the old Representative Concentration Pathways (RCP).

<https://www.arr-software.org/arrdocs.html>.

Amend the EIS to include reference to the latest guidelines.

the EPBC Strategic Assessment. The climate risk assessment is contained within the Climate Review Report and was included as Appendix 1.8 of this EIS and was used to inform the assessment within the EIS.

Appendix 1.18 outlines that RCPs are the internationally agreed, scientific climate models. The Climate Review Report, and EIS, assessed high emission (RCP8.5) and moderate emission (RCP4.5) scenarios to project future climatic conditions. It also considered Shared Socioeconomic Pathways (SSPs) to refine models; accounting for future developments in society, economy, and environment. RCPs and SSPs are internationally agreed-upon standard for climate modelling set by the Intergovernmental Panel on Climate Change (IPCC).

The climate review considered the RCP4.5 and SSP2-4.5 (intermediate scenario), and RCP8.5 and SSP5-8.5 (worst-case climate change scenarios), over mid-term (2050) and long-term (2100) timeframes.

As such we believe that the EIS and Climate Review Report has already done this.

Site level alignment with CPB policy to be determined - clarification and further detail is sought of what the “standards”/“requirements” are that would protect against extreme weather events. For example, would they require filling to a site level beyond those that the CPB recommend (to 2100 and beyond as per DEW comments) and those stated in the EIS in relation to Areas 1, 2 and 3 (page number 34, pdf 53), or other type of mitigation measure/s?

Response: We are unsure what DEW is requesting. Embedded measures to mitigate Impacts are shown within Table 14.6 of Chapter 14.

The project design is still evolving, and final design details, are not yet finalised. Consequently, the final construction method, including levels, remains undetermined at this stage. However, Chapter 14 outlines that minimum building floor levels shall be set a further 300 mm above the 1% AEP design flood level or above an elevation of 3.55 m AHD (minimum elevation of 3.30 m AHD specified in Council’s planning requirements under the Lefevre Peninsula Stormwater Management Plan). The concept design however anticipates finished floor levels would be in the order of 3.5-3.9m AHD in Area 1, 4.5-4.6m AHD in Area 2 and 5.0m AHD in Area 3. These levels are significantly above the recommended levels set by the CPB.

It is also noted that the Nuclear Qualified Facilities standards impose a higher burden on developments, which will further inform the

	<p>final design and mitigation measures as the Nuclear Licensing process progresses.</p> <p>These standards, in conjunction with the recommendations from CPB, DEW, and other relevant authorities, will be considered in the final design process to ensure that all necessary precautions are taken to mitigate against extreme weather events. As the design evolves, additional details regarding flood protection, site elevation, and other relevant measures will be finalised in alignment with the applicable standards and requirements.</p>
<p>Chapter 14 of the EIS, section 14.6.1 pages 252-253 indicate that the development will be built to nuclear licensing requirements which include protection against extreme weather events. It is recommended that the proponent undertake investigations to confirm that the nuclear actions associated with the proposed facility (particularly temporary waste storage – including ancillary low level radioactive waste associated with construction of the submarines) would not be at risk of coastal hazards, including sea flood inundation during a 1% Annual Exceedance Probability (AEP) storm surge event, taking into account sea level rise to the year 2100 (at a minimum), based on the very high greenhouse gas emissions scenario as per the Intergovernmental Panel on Climate Change’s Sixth Assessment Report - Shared Socio-economic Pathways 5-8.5. The outcome of the investigations should also identify any relevant requirements (e.g. siting and site level) required under any Commonwealth legislation to protect nuclear materials and/or radioactive materials from coastal flood hazards and the environment. Further this investigation should provide detail on how this requirement then aligns with the finished floor levels that would be required by the CPB.</p>	<p>Response: Agreed that this analysis is required and will be undertaken as part of the <i>Australian Radiation Protection and Nuclear Safety Act 1998</i> (ARPANS Act) approvals process.</p> <p>As mentioned in the workshop meetings, consultation responses received for the EIS and Strategic Assessment relating to these matters are being captured for further consideration and inclusion in the assessment and approvals process under the ARPANS Act.</p>
<p><u>Greenhouse Gas Emissions</u></p>	
<p>EIS Chapter 15 and GHG assessment (Appendix 1.9) - the preliminary Green House Gas (GHG) assessment (Appendix 1.9) has been drafted in the absence of "bills of quantities for expected materials or energy usage during project construction and operating phases and/or activities." DEW is</p>	<p>Response: As previously outlined in responses above, the EIS outlines that due to the high security nature of this defence project, some project details are not publicly available. Additionally, the project design is still evolving, and design details are not yet finalised. However, the EIS has included a detailed</p>

concerned by the large margin of error noted in the emissions assessment of $\pm 30-40\%$.

assessment of potential impacts using the best available information (the Infrastructure Master Plan as discussed within Chapter 2) at the time of submission and adopting a reasonable worst-case assessment.

As noted within the EIS, the GHG Emissions assessment provides an initial estimate of emissions associated with the project; however, it is important to acknowledge the large margin of error inherent in such assessments. The final outputs are highly dependent on key assumptions, including the source of materials (local, interstate, or overseas), the energy mix used in production and operations (renewable vs. fossil fuels), and other specific variables.

Given these factors, the assessment results should be interpreted as indicative rather than absolute, which is why the error margin is acknowledged. This initial analysis is intended to inform planning and decision making, with further, more detailed modelling to be undertaken as the project progresses. This additional assessment will refine the GHG inventory and form the basis of the project's GHG Emissions Reduction Strategy, ensuring that mitigation measures are appropriately targeted and effective.

The proponent notes that once greater design detail is determined, an updated GHG emissions assessment will be prepared along with a GHG Emissions Reduction Strategy. This is supported.

Response: Thank you for confirming.

Chapter 15 of the EIS and Appendix 1.9 should include reference to South Australia's Net Zero Strategy and updated emissions reduction targets.

Response: The EIS acknowledges that the South Australian Government was in the process of amending the *Climate Change and Greenhouse Emissions Reduction Act 2007* (the CCGER Act). However, at the time of writing the EIS, the *South Australia Climate Change and Greenhouse Emissions Reduction (Miscellaneous) Amendment Bill 2024* (the Amendment Bill) had not been adopted. Additionally, the amendments to the CCGER Act only took effect from 28 March 2025, meaning the EIS and Appendix 1.9 were prepared in alignment with the net zero strategy and emissions reduction targets applicable at the time.

Importantly, while the Amendment Bill accelerates the target for 100% renewable

	<p>energy, this policy shift does not materially change the findings of the EIS. The EIS already considers South Australia’s existing trajectory towards net zero emissions, and the key environmental impacts assessed, particularly in relation to greenhouse gas emissions and energy use, remain valid. The proposed changes do not alter the fundamental assessment outcomes, nor do they introduce new or unforeseen environmental risks requiring reassessment.</p> <p>As such, there is no requirement to update the EIS or Appendix 1.9. Furthermore, the final GHG Emissions Reduction Strategy, which will be secured as a condition of approval, will ensure consistency with the updated legislative context while maintaining the project's commitment to responsible environmental management and emissions reduction.</p>
<p>Page 279 - Incorrect reference to the 100% renewable energy generation target date of 2030. Should be 2027. Appendix 1.9:</p>	<p>Response: As outlined above, this was correct at the time of preparation. Target date only changed as of 28 March 2025 when the CCGER Act was officially updated.</p>
<p>- Page 3 - 2.a. Lists incorrect 100% renewable energy generation target date. 2030 should be 2027. Repeated throughout document, particularly in section four and figure 4-1.</p>	<p>Response: As outlined above, this was correct at the time of preparation. Target date only changed as of 28 March 2025 when the CCGER Act was officially updated.</p>
<p>- Page 22 - 4.2.1.4 typo in title "Nett Zero"</p>	<p>Response: Thank you for identifying this, this will be updated.</p>
<p><u>Sustainable Use of Resources</u></p>	
<p>Appendix 1.10 appears to adequately consider relevant legislation and policies available when the EIS was drafted.</p>	<p>Response: Thank you for confirming.</p>
<p>DEW supports the measures included in table 4-1, page 30, in particular the suggestion to seek a Green Star building rating. The proponent is strongly encouraged to consider and aim for 6 star Green Star rating for buildings and communities and remove the ambiguity which appears to suggest that in practice 5 stars will be considered.</p>	<p>Response: Thank you for confirming. As the project design is still evolving and final details have not yet been finalized, it is not possible to elaborate further or make any further commitments at this stage regarding this matter.</p>
<p>Appendix 1.10: Table 3-3 The SA Climate change actions have been replaced by the Net Zero Strategy and South Australian Government Climate Change Resilience and Adaptation Actions</p>	<p>Response: As outlined above, the EIS was prepared using the relevant legislation and policies in force at the time.</p>

Waste Management

<p>EIS Chapter 16 and Appendix 1.11 - DEW notes the high ($\pm 50\%$) margin of error in Tables 3-2 and 3-3 detailing preliminary assessments of waste streams in the construction and operational phases of development. Once the detailed design and further information is available a further assessment can be made.</p>	<p>Response: The EIS provides a detailed assessment of potential impacts based on the best available information at the time of submission (the Infrastructure Master Plan, as discussed in Chapter 2) and adopts a reasonable worst-case scenario approach.</p> <p>The Waste Management Report provides an initial estimate of the waste associated with the project. It is important to note that this estimate comes with a margin of error due to various uncertainties, such as the source of materials (e.g., locally sourced, interstate, or overseas), the types and quantities of waste generated during production and construction, the methods of waste management and disposal, and other project-specific factors like transportation logistics and waste processing technologies. Given these variables, the results should be viewed as indicative rather than definitive, which is why the error margin is acknowledged.</p> <p>This initial assessment is intended to inform early stage planning and decision making. As the project progresses, more detailed modelling will be undertaken, and the data from this initial analysis will be refined. This will form the basis for the project's Waste Management and Minimisation Plans, ensuring that mitigation measures are appropriately tailored, and effective as more accurate data becomes available once the final design is confirmed.</p>
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Flooding

<p>The information provided is inadequate to reassure DEW that once developed the site is safe from flooding and that access to the site during a flood event is maintained or that the development of the site doesn't adversely impact surrounding properties by transferring flood hazard risk.</p>	<p>Response: Please see cover letter that discusses this matter in further detail.</p>
<p>As DEW is the appointed Flood Hazard Risk Reduction Leader under the State Emergency Management Plan, it is particularly interested in effective flood management. The EIS should acknowledge the shared responsibility everybody has under the Emergency Management Act 2004 for emergency prevention and preparedness.</p>	<p>Response: Please see cover letter that discusses this matter in further detail.</p> <p>Table 18.1 - Summary of legislation and policy of Chapter 18: Flooding states, "This Act defines responsibilities for local councils and State agencies in flood disaster response and preparedness." Thus this is already acknowledged within the EIS. However, the</p>

	<p>Proponent is committed to contributing to DEW's strategic flood modelling for the Lefevre Peninsula and is eager to continue engaging with DEW to foster a collaborative approach to flood risk management under the <i>Emergency Management Act 2004</i>.</p>
<p>The report has identified historic tidal inundation flood extent, and also continued land subsidence over at least the next 30 years from the date of that assessment, as a result there is a likely additional 60mm of inundation over the site which will increase the extent of flooding.</p>	<p>Response: We acknowledge DEW's comment. As highlighted within the cover letter, the project design is still evolving, and final design details have not yet been confirmed. The EIS provides a detailed assessment of potential impacts based on the best available information at the time of submission (the Infrastructure Master Plan, as discussed in Chapter 2) and adopts a reasonable worst-case scenario approach.</p> <p>Please see cover letter that discusses this matter in further detail.</p>
<p>The Tonkin report referred to in the EIS was prior to 2016 when there was the highest tidal water level recorded as well as intense rainfall which resulted in significant flooding around the Port Adelaide area. This provided significant examples of combined storm surge and stormwater flooding occurring in South Australia. There is also guidance in Australian Rainfall and Runoff 2024 on how to assess the joint probability of tide levels/storm surge and stormwater flooding. As mentioned in CCRE1 the Australian Rainfall and Runoff 2024 is what should be used as latest guidance and using SPP scenarios for rainfall, rather than the old RCP. https://www.arr-software.org/arrdocs.html.</p>	<p>Response: Further information on this matter is provided in the accompanying cover letter.</p> <p>We acknowledge DEW's comment and note that the Tonkin report referenced in the EIS was prepared prior to May 2016, when the highest recorded tidal water level (2.51 m AHD) occurred in South Australia. However, we highlight that this highest observed sea level has been acknowledged within the SMP (Appendix 1.13, Section 2.3.2).</p> <p>While the Tonkin report predates this event, the SMP incorporates available and relevant data, and it evaluates the joint probability of a storm tide event occurring in conjunction with a design rainfall event. This combination is recognised as being extremely rare (i.e., with an annual exceedance probability smaller than 1%).</p> <p>We also note that the SMP has been prepared to support both the Strategic Assessment and the EIS processes. As such, any change to the approach or assumptions within the SMP would impact both processes. The project has been designed in accordance with current standards and guidance, and this will continue to be the case as the design is refined.</p>
<p>This needs to be updated in the document (Table 2 in section 5.2) at present it is vague:</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>

<ul style="list-style-type: none"> •the 1% AEP extreme tide, in combination with wave effects and stormwater runoff from the development; or •the 1% AEP overland flow event, with due allowance for the effect of tidal surge. 	
<p>This needs to specify the AEP of stormwater runoff in the first and tide level or AEP in the second.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>Any consideration of joint probability has been removed from the current report resulting in an unaddressed potential risk.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>The 2005 report for the City of Port Adelaide Enfield by Tonkin on Storm Tide inundation shows inundation of most of the submarine site under scenario 4. There needs to be consideration of this report, and the scenarios. None of these scenarios included stormwater inflows. After this report, the 2016 tidal event also had rainfall at the same time exacerbating flooding with stormwater. The national guidance on joint probability of storm surge and riverine flooding leading to the recommendations in Australia for Rainfall and Runoff was prepared by engineering professors including at the University of Adelaide. Hence the assertion that this does not need to be considered is no longer reasonable. Given this DEW considers the current analysis of the flood risk of the site is underestimated.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p> <p>We acknowledge DEW’s comment regarding the 2005 Tonkin report and the more recent 2016 tidal and rainfall event. We note that there are two key matters raised which we address below:</p> <ol style="list-style-type: none"> 1. Site-specific flood risk and design response: <p>The development has specifically addressed the risk of storm tide inundation to the subject site through the application of appropriate design measures. As outlined in Chapter 14 and Table 14.6, minimum finished floor levels are to be set at least 300 mm above the 1% AEP design flood level or above 3.55 m AHD, exceeding the minimum elevation of 3.30 m AHD identified in the Lefevre Peninsula Stormwater Management Plan. The indicative design anticipates finished floor levels of 3.5–3.9 m AHD in Area 1, 4.5–4.6 m AHD in Area 2, and 5.0 m AHD in Area 3, well above the levels recommended by the CPB. In addition, the design of the project is being informed by Nuclear Qualified Facilities standards, which require a higher standard of risk mitigation than typical development, with final levels being fixed as the design progresses.</p> 2. Regional flood context and broader implications: <p>We acknowledge that the Lefevre Peninsula is inherently susceptible to storm and tidal surge flooding due to its low-lying topography, and that parts of the peninsula, including areas outside the subject site, are already at risk</p>

	<p>under extreme events such as those outlined in the 2005 Tonkin report and the 2016 flood event. The flood risk assessment undertaken for the project has demonstrated that the project, based on the current design, will not increase storm or tidal flood risk to surrounding properties. While it is recognised that the development may alter local flow paths within the subject site and broader peninsula, these changes are consistent with the existing flood context and do not introduce additional flood risk.</p> <p>As the design is refined, further modelling and assessment will be undertaken to confirm this position and inform final SMP. The Proponent is committed to working with DEW and other relevant agencies to ensure that the project remains aligned with broader regional flood management objectives.</p>
<p>It is noted that the council has provided advice on site and floor levels which could be based on advice from the CPB which would have only considered the tide and storm surge, not additional stormwater flooding.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>The EIS should include a plan of the current site levels and final contours/proposed finished floor levels would provide detail on how much fill is needed. Increasing the site levels would enable the basins inverts to be left just above the shallow groundwater but effectively be deeper and have a greater storage volume. This will only work for basins constructed on site with dedicated outfall pipes, otherwise there would be an increased risk of flooding land adjacent to other basins.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>The EIS should also consider whether the development, as a result of fill to support the finished floor levels, will result in transference of flood risk and stormwater runoff flows on adjoining sites and downstream. This includes any additional impacts on Mutton Cove which remains at pre-fill levels and is vulnerable to inundation and receiving increased surface water runoff.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>For context, DEW advised during consultation on the draft Technical Reports, that 2020 DEW bathtub flood mapping for the region uses the following storm tide heights; 2020 1% AEP =</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>

<p>2.7m AHD, 2050 1% AEP = 3m AHD and 2100 1% AEP = 3.7m AHD.</p>	
<p>Table 2.4 'Phase 1 Construction Stages' on page 34 of the EIS, against the column 'Stage 2 Excavation and filling of land' provides that finished floor levels would be in the order of 3.5m-3.9m AHD in Area 1, 4.5-4.6m AHD in Area 2 and 5.0m AHD in Area 3. This table is the only part of the EIS and appendices that refer to those specific floor levels, while throughout the remainder of the EIS and appendices there is reference to the site being filled to a minimum site (surface) level of 3.30m AHD and building floor levels set above a minimum level of 3.55m AHD (which allows for sea level rise at 2050, not 2100 as sought by the Coast Protection Board for a development with this lifespan).</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>Whilst the levels stated for Areas 2 and 3 would allow for a 1% AEP storm at 2100 (3.7m AHD based on 2020 DEW bathtub flood mapping), the levels stated for Area 1 would only be suitable for 2050. It is therefore recommended that Area 1 achieve a minimum site (surface) level of 4.0m AHD and finished floor level of 4.25m AHD, to allow for sea level rise at 2100.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>Due to the expected lifespan of the development (10-15 years construction and 30+ year operation, i.e. minimum year 2065), coastal flood risk assessments and any mitigation measures should consider sea level rise at 2100 as a minimum, and potentially sea level rise beyond 2100 should it be intended that operations continue beyond 30 years.</p>	<p>Response: Please see response above and the accompanying cover letter for further information on this matter.</p>
<p>DEW acknowledges the statement on page 252 of the EIS that the "minimum surface and building levels specified above [site 3.30m AHD / floor 3.55m AHD] may be raised at a later stage as the design develops and the site-specific flood risk assessment is completed". To assist in determining appropriate site (surface) and floor levels, DEW can offer to share flood mapping information (which is not currently publicly available) under a Data Licence Agreement, or have a meeting to show the mapping.</p>	<p>Response: We acknowledge DEW's offer to provide access to flood mapping information to assist in determining appropriate site and floor levels. The Proponent would be open to entering into a Data Licence Agreement or arranging a meeting to view the mapping, and will follow up with DEW to progress this accordingly.</p>
<p><u>Dangerous Substances (excluding Nuclear)</u></p>	

<p>Refer to CCRE1 comments in relation to coastal hazard risk and radioactive waste.</p>	<p>Response: See previous responses on these matters.</p>
<p><u>Land tenure, protected areas and land use</u></p>	
<p>Minor inaccuracy and questions the statement that there will be no direct impact on Mutton Cove.</p>	<p>Response: See responses below.</p>
<p>Page 219 of the EIS states that there is no public vehicle access to Torrens Island Conservation Park. It is noted that some vehicle access does occur down a public road, past the power station, and into the park. This vehicle access is used by members of the public seeking to access the historic Quarantine Station, usually as a part of a tour group.</p>	<p>Response: The EIS correctly states that there is no public vehicle access to Torrens Island Conservation Park, as confirmed by the National Parks and Wildlife Service, South Australia. The EIS does not state that there is no vehicle access at all, rather, it clarifies that public vehicle access is not permitted. Access to the park is managed and restricted, rather than open to the public for private vehicle use.</p>
<p>Mutton Cove is unallocated Crown Land that lies within the boundary of the ADS, with daily care and control shared by the Crown Lands Branch and National Parks and Wildlife Service. Mutton Cove will be surrounded by AUKUS development on its landward boundaries and by an AUKUS-controlled area of the Port River on its eastern boundary. It is understood from the EIS that it is to be retained as a conservation area. DEW supports Mutton Cove being retained and managed for conservation purposes. DEW is currently working with ANI to determine the best way to manage Mutton Cove in the future, given that the land is likely to largely be situated within the ANI secure site.</p>	<p>Response: It is noted that DEW supports the continued conservation management of Mutton Cove. The Proponent recognises the importance of ongoing collaboration with DEW, the Crown Lands Branch, and the National Parks and Wildlife Service to determine the most appropriate management approach, given the site's location within an area that would be subject to tighter security.</p>
<p>The EIS states (page 224) in relation to Mutton Cove that “No direct impacts are expected to occur to Mutton Cove as a result of the development. Potential impacts would be indirect and reversible (i.e., temporary and short term) and likely be disturbance from noise, increased workforce presence and surface water runoff.” Given the filling of Area 3 to the north of Mutton Cove the EIS does not make it clear how this, or the additional stormwater runoff from hard surfaces associated with future development surrounding Mutton Cove, was assessed to draw this conclusion. Without this detail it is difficult for DEW to support that there is no direct impact on Mutton Cove. DEW acknowledges that it is proposed to deal with the detail in the CEMP and OMP, given this,</p>	<p>Response: The EIS provides detailed assessments of flooding and surface water runoff within Chapter 18: Flooding and Chapter 21: Surface Water and Groundwater Quality, which have informed the assessment of potential impacts on Mutton Cove. These assessments consider the filling of Area 3 and the additional stormwater runoff from hard surfaces associated with future development.</p> <p>Additionally, Section 12.6.1: Embedded Mitigation Measures in Chapter 12: Marine Flora and Fauna outlines mitigation measures to manage potential impacts, including those related to surface water management.</p> <p>The conclusion that no direct impacts are expected is based on these comprehensive assessments and embedded mitigation measures. The potential for indirect and</p>

<p>DEW suggests that the direct impact be unknown until further information is available.</p>	<p>temporary impacts has been fully considered, and appropriate controls are already embedded in the project design. While further detail will be developed through the CEMPs, OEMPs and SMP, this does not indicate that impacts are unknown, rather, it reflects the standard approach of refining management strategies as the project progresses, based on site-specific conditions and best practice environmental management.</p>
<p><u>Coastal and Marine</u></p>	
<p>Lack of information about dredging, both proposed in this EIS and the future dredging this project is dependent on.</p>	<p>Response: Please see cover letter for further information on capital dredging and cumulative effects.</p> <p>Additionally, Section 6.7 of Chapter 6 provides a detailed explanation of how the cumulative impact assessment was conducted, including the methodology for identifying relevant projects. It is critical to recognize that cumulative impact assessments must be guided by clearly defined parameters, the first of which in the EIS is the temporal scope, specifically, whether a given project will be constructed concurrently with the SCY. Without a temporal overlap, direct cumulative impacts cannot occur.</p>
<p>DEW notes that the EIS does not include the dredging of the Port River and navigational channel and basin and ongoing maintenance dredging activities for the project, except for those associated with the wharf at Area 3. This has meant that all potential impacts on the marine environment from dredging have not been considered at this time. DEW understands that the operational dredging won't be required for at least 10-15 years and acknowledges that the Port River marine environment could change over that time and dredging processes and mitigation measures could advance so it makes sense to leave the assessment of the operational dredging until closer to the time it is required.</p>	<p>Response: Please see cover letter for further information on capital dredging.</p>
<p>This project is dependent on the future dredging, and it is the future dredging that is likely to have the biggest impact on ADS marine environment and dolphins. The lack of information and assessment possible at this stage means that DEW has to provide advice in the absence of knowledge about those impacts and about the cumulative impacts of</p>	<p>Response: Please see cover letter for further information on capital dredging and cumulative effects.</p> <p>With regards to dredging associated with the marine infrastructure of Area 3, as discussed in the workshop meeting, due to the nature of this project as a high-security defence project,</p>

the various Port River dredging works. There is an obligation to further the objectives of the ADS Act and new Management Plan, the EIS should provide a response as to how the project is doing that. In addition, further information should be provided about the potential impacts and mitigation measures from the dredging associated with the Area 3 wharf. DEW supports the EPA response on PE1.

not all information is publicly available. Additionally, the project design is still in progress, and final design details are not yet available. Consequently, it is not possible at this time to provide the detailed modelling that would typically be submitted as part of a dredging licence application.

The qualitative assessment provided in Chapter 20: Coastal and Marine of the EIS, which draws on findings from the Flinders Ports Holdings' dredging activities in 2005 and 2017, was deemed the best available option to assess the likely significance of effects of the dredging of the project.

As outlined and agreed with the EPA during the workshop meeting, further assessment and approvals will be undertaken and provided to the EPA as part of the dredging and disposal licence application under the *Environment Protection Act 1993*. The requirement for the Project to obtain a dredging licence will be a reserved matter in the development approval.

Note that the Proponent has responded to the EPA in relation to PE1 comments with the text above, with the EPA confirming they are satisfied with the current assessment and that further assessment and approvals will be undertaken and provided to the EPA as part of the dredging and disposal licence application under the *Environment Protection Act 1993*.

The most significant risk to the ADS is noise and vibration on the marine environment and dolphins from dredging. Which could be exacerbated by the cumulative impact of dredging works. There are several other dredging projects planned for the Port River and these dredging works could have been assessed in this EIS for their potential cumulative impacts on important habitats within the ADS. For example, Venice Energy have an approval to dredge 2.2 million cubic metres from the Outer Harbor and if the NPSCY dredge of 1 million cubic metres occurs at the same time, there could be significant impacts that may be very difficult to resolve. Addressing cumulative impact is a requirement in BE2 Marine Flora and Fauna but is also relevant here in relation to the proposed and future dredging projects that have the

Response: Please see cover letter for further information on this matter. Additionally, see responses to noise and vibration comments that address these concerns.

<p>potential to impact the marine environment and dolphins.</p>	
<p>Dredging from the construction activities is included in this EIS and comprises a large amount of sediment with the intention to dispose to sea. DEW note that the EPA will require a dredge management plan through the licensing process for this work and will also likely require substantial reductions in dredge volumes through strategies such as dredging the shiplift and wet dock via a coffer dam or similar with land disposal of soil. The offshore dredge material disposal area is limited to marine sediments, not land based soil. DEW supports the EPA submission in relation to PE1 and the need to provide additional information about the dredging associated with the wharf area.</p>	<p>Response: See response above that addresses this matter.</p>
<p>The risks associated with the temporary displacement of resident dolphins from their established habitat during the proposed marine construction and future dredging operations also needs to be more thoroughly addressed within the EIS. These operations may pose not only direct disturbance risks to the dolphins, but also potential secondary impacts on community interests. If the dolphins are displaced and potentially forced to temporarily or permanently relocate, it could lead to both economic consequences and broader community impacts. An assessment of these risks should be incorporated into the EIS to ensure that all potential repercussions are fully considered.</p>	<p>Response: The EIS has thoroughly assessed the potential impacts of marine construction and future dredging operations on resident dolphins, including the risk of disturbance. It is important to clarify that displacement in ecology terms generally refers to the permanent or long-term exclusion of a species from its habitat due to habitat destruction or significant alteration that prevents its continued use. Temporary avoidance of an area due to construction noise or activity does not constitute displacement, as animals can and do return once the temporary activity ceases.</p> <p>The proposed marine infrastructure within Area 3 (the component impacting the marine environment) will occur within a highly localised area, covering only 0.1% of the ADS, and are of short duration. Given the wide ranging nature of dolphins and the availability of suitable habitat within the Port River system, these temporary activities are not expected to displace the resident dolphin population.</p> <p>The EIS also outlines mitigation measures, including noise and vibration management and construction scheduling considerations, to minimise potential disturbance. Furthermore, the dolphins in this region are already habituated to industrial and Port activities, and there is no evidence to suggest that similar</p>

	<p>temporary works in the past have resulted in permanent displacement.</p> <p>The assertion that these works could force dolphins to permanently relocate and cause economic and community impacts is not supported by the available evidence. While temporary movement in response to construction activities may occur, the resident dolphins are expected to return to their usual habitat once works are completed. As such, the risk of permanent displacement and associated economic consequences is negligible.</p> <p>Ongoing monitoring and adaptive management measures, as outlined in the EIS, will ensure that any potential impacts remain minimal and appropriately managed throughout the construction period.</p>
<p>Regarding noise and vibration impacts from piling, DEW requires all reasonable and practicable mitigation measures that minimise risks to dolphins within the ADS. This is in accordance with Underwater piling and dredging noise guidelines prepared by the Department for Infrastructure and Transport.</p>	<p>Response: See responses to noise and vibration comments that address these concerns.</p>
<p>Chapter 20 table 20.1 on page 338 should reference the Adelaide Dolphin Sanctuary Act 2005 and the Adelaide Dolphin Sanctuary Management Plan 2025.</p>	<p>Response: See responses to Marine Flora and Fauna comments that address these concerns.</p>
<p><u>Surface Water and Groundwater</u></p>	
<p>Modelling is inadequate in describing the alteration to surface water flows as a result of the development or in detailing how stormwater runoff will be managed. This is related to DEW comments on HR2 Flooding as there is a relationship between how stormwater will be managed post development and whether or not that would increase the risk of flooding.</p>	<p>Response: Please see cover letter for further information on modelling.</p>
<p>The EIS does not fully address this Assessment Requirement with regard to describing the state of the known groundwater related environmental conditions including quality and significance of groundwater in the area of the development and any surrounding area (comments 1-3 in Comment column).</p>	<p>Response: We note that the EPA is the lead agency responsible for groundwater quality, particularly in relation to contamination and pollution control under the EP Act. The EPA has confirmed that sufficient information has been provided in the EIS to satisfy the relevant Assessment Requirement at this stage, including the state of the known groundwater related environmental conditions. The EPA's response also notes that future work will</p>

	<p>include the preparation of a Dewatering Management Plan, to be developed to the satisfaction of the EPA, as outlined in the EIS. In addition, the Stormwater Management Plan (Appendix 1.13) will be updated to incorporate the final design information, and other information provided in the EIS, and to address both stormwater quality (treatment) and quantity (flooding) considerations.</p>
<p>Missing information regarding whether a water licence will be required for the taking of any groundwater for industrial uses (as the subject land is in the Central Adelaide Prescribed Wells Area) (comment 4 in Comment column).</p>	<p>Response: The EIS does not include reference to a water licence because no groundwater extraction is currently proposed as part of the operation of the project.</p>
<p>Missing information regarding establishing a baseline groundwater quality according to published SA guidelines (comment 5 in Comment column).</p>	<p>Response: Baseline groundwater information, including quality, was included within the EIS. A groundwater investigation to assess the contamination status of groundwater beneath the subject site was also undertaken as part of the scope of work completed in 2024. This information is included within JBS&G Site Contamination Assessment Contamination, Appendix 1.14 as referenced within Chapter 21 and was used to inform the assessment of effects within Chapter 21.</p> <p>Additionally, as discussed in the workshop meeting, since the submission of the EIS, ANI and JBS&G have been undertaking further work to address known data gaps. An Addendum to Site Contamination Assessment, and Hazardous Ground Gas (HGG) Assessment for Area 1 and Area 2 have been provided to the EPA.</p> <p>The EPA has reviewed the updated reports and confirmed that sufficient information has been provided in the EIS to satisfy its requirements.</p>
<p>Previously DEW has suggested a number of measures to assist in manage stormwater associated with the development, which is adjacent and discharging to the ADS, these were:</p> <ul style="list-style-type: none"> • Consideration could be given to limiting the average annual runoff from the site post-development as the most effective means of minimising stormwater impact on the marine 	<p>Response: The EIS addresses stormwater management measures in detail within the embedded mitigation measures section of Chapter 21 and in the Stormwater Management Plan (SMP) (Appendix 1.13). These documents incorporate water-sensitive urban design (WSUD) principles and identify measures aimed at minimising impacts to the ADS, including controls on runoff quality and volume.</p>

<p>environment. 50mm average annual runoff would be a reasonable target.</p> <ul style="list-style-type: none"> Traditional car parks have significant stormwater impacts. They do provide excellent WSUD opportunities to mitigate their impacts as well as contribute to cooling and greening. Consider requiring that no runoff be generated from carpark areas in the 1 EY rain event (1 EY means “one exceedance per year on average”, or the amount of rain that you’d only expect to get once a year, on average). 	<p>Specifically, the SMP outlines design objectives that consider limiting post-development average annual runoff and managing runoff from car parking areas, aligning with DEW's previous recommendations. The principles behind the suggested 50mm average annual runoff target and zero runoff in the 1 EY event from car parks have been taken into account in the development of stormwater strategies.</p> <p>As the final design of the project is still being developed, detailed stormwater modelling to confirm final performance against these targets cannot be completed at this stage. However, this modelling will be undertaken once design is finalised and will inform the finalisation of stormwater infrastructure and mitigation measures within the final SMP to ensure they are appropriate and effective in protecting the adjacent marine environment.</p>
<p>The EIS has not addressed these measures that were aimed at reducing the stormwater impact on the estuary environment.</p>	<p>Response: See response above.</p>
<p>Appendix C of the stormwater management plan contains the following: “External sites draining to the same system that would service the NPSCY were excluded from the MUSIC modelling, as it is assumed these external areas would manage the quality of their own stormwater prior to discharging to the NPSCY’s drainage system.”</p> <p>This assumption might be suitable for Viterra with a basin on their land, but considered unreasonable for the rest of the adjacent land as it is most likely that in the past the other basins would have been constructed as flood mitigation basins for the existing development and roadways to cope with storm surge and not being able to discharge to the sea without consideration for the future development of the NPSCY site. As a result, DEW considers that the modelling should address the water quality for all areas draining to these basins including roads.</p>	<p>Response: See response above. As the final design of the project is still being developed, final stormwater modelling cannot yet be completed. However, we confirm that the final SMP will incorporate a more comprehensive approach to modelling surface water, including external catchments that discharge into the shared system, such as roadways and other surrounding land uses.</p> <p>This will ensure that the final SMP reflects the final assessment of surroundings properties and provide appropriate mitigation measures to protect the adjacent marine environment.</p>
<p>There are no geological or hydrogeological cross sections of the site presented. DEW highly recommends the development of such cross sections to support hydrogeological conceptualisation. Similarly, a schematic diagram and related discussion describing the source-impact-receptor relationships inherent</p>	<p>Response: This level of detail has not been requested by any relevant authority to date, and given that the subject site is not known to be highly contaminated, the inclusion of geological or hydrogeological cross sections and a source-impact-receptor schematic</p>

<p>on the site would also aid risk assessment argument.</p>	<p>would not materially change the outcome of the assessment.</p>
<p>DEW suggests extending groundwater studies to include the Q2 aquifer, inclusive of: determining connection or otherwise to the Q1 aquifer ASS characterisation, and establishment of a fit-for-purpose monitoring network and associated Groundwater Monitoring and Management Plan.</p>	<p>Response: As discussed in the workshop meeting, since the submission of the EIS, ANI and JBS&G have been undertaking further work to address known data gaps. The following updated reports have been provided to the EPA:</p> <ul style="list-style-type: none"> • Addendum to Site Contamination Assessment. • Hazardous Ground Gas (HGG) Assessment for Area 1 and Area 2. <p>These reports serve as addendums to the Site Contamination Assessment included as Appendix A of Appendix 1.14: Physical Environment, with the completed works aligning with those outlined by JBS&G in Appendices B and C of Appendix 1.14.</p> <p>This updated work included assessing the quality of groundwater in the second Quaternary aquifer in Area 3 where significant excavation and dewatering is likely to be required.</p> <p>Additionally, these addendums to the Site Contamination Assessment, i.e., Appendix C and D, have been reviewed in the context of the significance assessment provided in Chapter 19: Contamination of the EIS. URPS confirms that no updates to Chapter 19 are required, as the findings of these reports do not alter the previously assessed Magnitude of Impact or Significance of Effect.</p> <p>The EPA has reviewed the updated reports and confirmed that sufficient information has been provided in the EIS to satisfy its requirements. The EPA has also noted that the CEMPS will be developed for the various stages of the development and will be prepared in accordance with EPA guidance. These will incorporate an Acid Sulfate Soil Management Plan (ASSMP) and a Dewatering Management Plan to address contamination of groundwater in the Q1 and Q2 aquifers.</p>
<p>Information concerning location, status and purpose as stored in WaterConnect (SA_Geodata) is not routinely audited and updated because of the very large number of</p>	<p>Response: It is important to note that the information obtained from WaterConnect was part of a desk-based data search. A groundwater investigation was undertaken in</p>

<p>wells. Consequently, the proponent should conduct an audit of nearby wells to develop a contemporary picture of groundwater users for risk assessment purposes.</p>	<p>2024, as detailed in Appendix 1.14 of the EIS, across the subject site to assess both the quality and contamination status of groundwater. The results from the groundwater investigation have been used to inform the assessment within the EIS. As such, conducting a separate audit of nearby wells is not deemed necessary, as the Appendix 1.14 provides the most up-to-date and relevant information for the risk assessment of the subject site.</p>
<p>With respect to potential requirements for dewatering of the Q2 aquifer for construction purposes, the proponent is advised that they should contact Water Licencing at DEW prior to ensure that there are no water licensing requirements.</p>	<p>Response: See previous comment on this matter.</p>
<p>DEW notes the presentation of water quality and hydrochemistry data and also notes the assessment regarding the source of discussed contaminant. DEW suggests that the proponent review the “Guidelines for Establishing Baseline Groundwater Quality” recently published by the EPA to ensure adequate baseline chemistry data is collected so pre- development impacts may be defensibly established.</p>	<p>Response: The EPA has confirmed that sufficient information has been provided in the EIS to satisfy its requirements, including the assessment of known groundwater-related environmental conditions.</p>
<p>There are minor editorial corrections to be made in Appendix 1.14 regarding references to other appendices. E.g., Appendix H should be Appendix I and Appendix I should be Appendix J.</p>	<p>Response: Noted.</p>
<p><u>Heritage Places and Areas</u></p>	
<p>As indicated in AEQ2 DEW is satisfied with the response included in the EIS in relation to monitoring and managing vibration impacts to surrounding State Heritage Places.</p>	<p>Response: Thank you for confirming.</p>
<p>There is no State Heritage Place with archaeological designation within the site, and the archaeological assessment in the EIS concludes that the archaeological potential is low. No archaeological permit is required under the Heritage Places Act 1993 prior to commencing works. Nevertheless, statutory obligations for reporting the discovery of any archaeological artefact of significance remain in place.</p>	<p>Response: This is noted, and the projects CEMPs will embed strategies and procedures to ensure parties understand their legal obligations under the <i>Heritage Places Act 1993</i> in the event of unexpected discoveries.</p>
<p>DEW is satisfied with recommendations in the EIS for inclusion of an unexpected finds</p>	<p>Response: Thank you for confirming.</p>

<p>protocol and staff inductions for historical archaeology in the relevant contractor Construction Environmental Management Plans.</p>	
<p>Six historic shipwrecks – four located in the Port River and two situated in Mutton Cove Conservation Reserve – are identified by mapping with potential to be impacted by the proposed works. Only one of the river shipwrecks (Napperby) is likely to have extant material remains, but these are likely to lie further south and closer to the opposite bank, thus well outside the dredging footprint and unlikely to be impacted.</p>	<p>No response required.</p>
<p>DEW has concern that the Excelsior shipwreck in Mutton Cove, which is located less than 100 m from the site could be at risk from vibration impacts generated by piling, compacting and other construction works. Currently, the types of construction work for the development and their exact distance to the wreck are unknown, but DEW is satisfied with the response included in the EIS including, the proposed mitigation measures and the approach to monitoring and managing vibration impacts to the wreck. Importantly, this includes inspection and photographic recording of Excelsior and preparation of a dilapidation record/report of the wreck prior to any construction works.</p>	<p>Response: Thank you for confirming.</p>

Department for Health and Wellbeing

DHW comment	Proponent/technical subconsultant response
<p>The Environment Protection Authority is the lead agency within South Australia for environmental matters, including air quality, water quality and noise. Notwithstanding, Officers of the EPA and DHW work collaboratively on range of issues where there are associated impacts on human health.</p>	<p>Response: The Proponent acknowledges the relationship between the EPA and DHW, with the EPA leading on environmental matters, while collaboration with DHW ensures human health impacts are also considered.</p>
<p>Officers of DHW welcome the opportunity collaborate with the EPA on the review the Construction Environmental Management Plans (once available) with the objective of mitigating impacts on human health, such as those that have been associated with other large scale industrial developments in this region and other parts of South Australia.</p>	<p>Response: The Proponent welcomes the proactive engagement of the DHW alongside the EPA in the development of CEMPs following planning approval.</p>

DHW particularly looks forward to collaborating with the EPA and other agencies in the development of any public health risk communication activities relevant to this important project. It should be noted that while the existing air quality modelling indicates a low/negligible risk to public health, the community's perception of human health risks associated with this project may differ given the presence of other heavy industries in the area.

Response: This is acknowledged. The Proponent welcomes DHW's involvement during the delivery and operational stage of the development, particularly in shaping and communicating public health risk messaging as part of ongoing community engagement following planning approval.

Based on modelling, the primary air quality risk appears to be NO₂ (especially from increased traffic). Whilst the modelling shows that in general, all the receptor residential sites meet the relevant NO₂ criteria, there is 1 site that exceeds the 1 hr NO₂ criteria. It is however acknowledged that the model is highly conservative and is likely to be overestimating the levels. However, given that the 2021 Census shows that the percent of the population in the North Haven area with asthma (9.8%) is relatively higher than in South Australia (8.9%) and Australia (8.1%) this pollutant should be closely monitored and clear risk communication/management options should be provided to people with pre-existing conditions such as asthma in the area.

Response: As noted, the traffic model that informed the Air Quality Assessment was intentionally conservative, representing a worst-case scenario for assessment purposes. The traffic model accounts for regional growth (including Metropolitan Adelaide and the Lefevre Peninsula Masterplan), existing ANI operations, and the NPSCY development site but does not yet factor in mitigation measures such as public transport usage by construction workers, fleet electrification, or sustainable fuels.

The Proponent is actively engaging with the Department of Infrastructure and Transport, the Office for AUKUS, and other agencies who are involved in the preparation of the Lefevre Peninsula Masterplan. The Lefevre Peninsula Masterplan will provide a structured approach to transport and infrastructure planning on the Lefevre Peninsula. This process aims to minimize potential traffic-related impacts, including air quality.

Given the existing asthma prevalence in North Haven, the Proponent acknowledges the importance of monitoring NO₂ levels and ensuring clear risk communication. The Proponent will continue working with relevant agencies to explore appropriate monitoring strategies and community engagement approaches to address potential concerns, particularly for residents with pre-existing condition.

Consideration should be given to using the 2021 WHO air quality guidelines for PM₁₀, PM_{2.5} and annual NO₂ which is lower than the 2016 Air Quality EPP and likely to be more protective of the health of sensitive population or those with pre-existing conditions such as asthma.

Response: The Air Quality Assessment for the development has been undertaken in full accordance with the EPA guidance and the *Air Quality Environmental Protection Policy 2016* (Air Quality EPP 2016). The assessment approach was agreed upon

	<p>with the EPA, which is the lead agency responsible for setting and regulating air quality standards in South Australia.</p> <p>The air quality criteria established in the Air Quality EPP 2016 are based on scientific evaluation and are designed to be protective of human health, including sensitive populations. While the 2021 WHO air quality guidelines provide aspirational global targets, they are not currently adopted as regulatory standards in South Australia. As such, the assessment has appropriately used the mandated South Australian criteria.</p>
<p>Other potential air quality issues are likely to be associated with nuisance dust (TSP). While there is provision for TSP and deposited dust monitoring in the Air Quality Assessment report, the guidelines for these are based on annual averaging. Consideration should be given to short-term high-level dust emissions that may occur from time to time, which have the potential to result in significant health impacts on communities. Consideration should be given to including a 24-hour guideline for TSP. In addition, ongoing monitoring of PM10 and PM2.5 is supported by SA Health based on the health effects associated with exposure to these.</p>	<p>Response: A Construction Air Quality Management Plan (CAQMP) will be developed and incorporated into the CEMPs for the NPSCY. The CAQMP will outline specific strategies and procedures for controlling emissions, with a primary focus on dust management throughout the construction phase. Best practice measures will be implemented to mitigate dust generation, ensuring compliance with relevant guidelines and minimising nuisance impacts.</p> <p>The CAQMP will also establish a monitoring framework, which will include provisions for total suspended particulates, deposited dust, and PM10/PM2.5 monitoring, consistent with the Air Quality Assessment recommendations in Appendix 1.1 of the EIS and EPA guidelines. Consideration will be given to short-term dust events, and appropriate measures to manage high-level emissions will be incorporated.</p> <p>The development of the CEMPs, including the CAQMP, will involve engagement with relevant agencies to ensure that monitoring and mitigation strategies align with regulatory expectations and community health considerations. This would occur post planning approval of the NPSCY once the final design has been confirmed.</p>
<p>Give the duration of this project plan, there should be a provision to amend the guidelines to reflect the most recent Environment Protection (Air Quality) Policy (Air Quality EPP) or other guidelines that have been adopted in the Air</p>	<p>Response: The Air Quality Assessment has been undertaken as part of the planning approval process for the NPSCY and is based on the current Air Quality EPP 2016 and relevant guidelines in force at the time of assessment. Any planning approval will be determined based on this assessment,</p>

<p>Quality Assessment report as the project progresses.</p>	<p>and the Air Quality Assessment within the approval will not be updated over the course of the NPSCY lifecycle.</p> <p>However, additional assessment work will be undertaken as necessary for the preparation of management plans and EPA licences for the NPSCY. These assessments will be conducted in accordance with the guidelines and regulatory requirements in force at the time of their preparation, ensuring that air quality management remains aligned with the current standards and best practices.</p>
<p>It is noted that this project falls within an area where there is significant recreational fishing in surrounding waterbodies. The potential for the mobilisation of contaminants in these waterbodies and the subsequent contamination of recreationally caught fish for human consumption should also be considered.</p>	<p>Response: The EIS has undertaken a comprehensive assessment of potential contamination impacts on surface and groundwater for the NPSCY. The assessment within the EIS confirms that, with the implementation of the proposed mitigation measures, including management plans, Water Sensitive Urban Design features, and mechanical filtration devices, water quality will be effectively managed, ensuring that any discharge into the Port River is treated and meets relevant environmental standards.</p> <p>The mitigation measures outlined in the EIS ensure that water quality remains protected, thereby safeguarding both ecological and human health receptors. Given these measures, the potential for mobilisation of contaminants is considered to be Negligible, and the NPSCY does not pose an increased risk to human health through the contamination of recreationally caught fish for human consumption.</p>
<p>It is also noted that this project will be in a highly mosquito prone environment, where there may be significant nuisance biting impacts (particularly at dawn and dusk throughout the peak mosquito period (October – April)). Integrated mosquito management principles and practices should be applied accordingly.</p>	<p>Response: We acknowledge the comments from the DHW regarding the potential for mosquito-related nuisance impacts, particularly during the peak mosquito period (October – April). These measures will be incorporated into the CEMPs and OEMPs for the NPSCY, ensuring that appropriate mosquito management strategies are in place throughout both the construction and operational phases of the NPSCY.</p>

Department for Infrastructure and Transport

DIT comment	Proponent/technical subconsultant response
<u>Traffic and Transport</u>	
<p>Whilst the Department is supportive of the development, it is considered that the assessment provided is too brief and does not provide the level of detail required to describe the full impacts and mitigation measures required. The Department has been working with the applicant as part of this application and other related activities associated with the AUKUS project and has advised of the above.</p> <p>The Department considers that the TIA needs to be updated to include the following content:</p> <ol style="list-style-type: none"> 1. Increased detail about access into the submarine construction yard and its traffic impacts (including traffic volumes and distributions along key roads), drawing from the work undertaken for the Link Road mentioned in the reports. 2. Details of the PM peak and daily volume impacts (only AM impacts have been provided). 3. Assessment on how a “partially-constrained” wider road network is able to service the SCY precinct. 4. Details of the plan to support the traffic generated by this development on the surrounding network, including master planning, shift management, traffic management plans for the individual phases of the development (e.g. construction, commissioning and full operation). 5. Discussions about promotion of active travel modes like public transport, walking and cycling being supported by the provision of suitable end of trip facilities on site. <p>Upon the provision of the above information the Department will be able to provide further comment and advice.</p>	<p>Response: The Proponent acknowledges DIT’s response regarding the assessment.</p> <p>As discussed and agreed at the meeting held on 16 April 2025 between DIT, URPS, and ANI, additional traffic assessment and modelling will be undertaken. The purpose of this modelling is to respond to the feedback raised by DIT and to evaluate how the potential mitigation measures outlined in Section 9.7 of Chapter 9: Traffic and Transport could reduce traffic impacts associated with the SCY and minimise effects on the road network.</p> <p>Once the modelling is complete, a follow-up meeting will be held with DIT to discuss the results.</p> <p>Traffic investigations are anticipated to continue in partnership with DIT. It is proposed that the requirement to complete this work be secured as a Reserved Matter under the development approval. This process will also involve other relevant State and Commonwealth Government departments as required.</p> <p>This ongoing work will include further development and refinement of the traffic model to support detailed assessment and comparison of mitigation options as operational planning progresses. Additionally, more detailed modelling and evaluation of specific mitigation options will be undertaken to support shortlisting and ultimately identify a preferred network approach.</p>
<u>Marine Impacts</u>	
<p>As part of the Assessment Guidelines, an assessment on the impact on existing and projected shipping, recreational and other</p>	<p>Response: As outlined within Section 9.4.2, Scoped Out, of Chapter 9: Traffic and Transport of the EIS, it was determined that</p>

maritime/water vessel access to the Port of Adelaide, Torrens Island and Port River (including impacts of security considerations / exclusion zones including information and understating of anticipated maritime/vessel impacts) was required, however this appears not to have been included within the EIS. This assessment is required to be included in the EIS to understand the likely impacts on existing maritime activities.

maritime vessel movements during the operational phase would not occur at a frequency that would result in a noticeable impact on existing maritime activities within the Port River.

Furthermore, of those limited operational maritime vessel movements, i.e., those associated with the launch of the submarines and movements during sea trails, would be coordinated with the Port Operator (Flinders Ports Corporation), as is standard practice in South Australia. This coordination ensures there are no adverse effects on shipping, recreational, or other vessel access.

The Proponent has no control over the selection, scheduling, or movement of vessels transporting materials to South Australia or Australia for use in the Project, during both the construction and operational phase. As a result, the Proponent should not be required to undertake an assessment within the EIS on matters wholly outside the Proponent's control, and for an aspect that the Project does not significantly impact on.

Notwithstanding, the EIS has appropriately justified the scoping out of these matters, demonstrating that the existing maritime transport infrastructure has sufficient capacity and that operational coordination measures are in place to prevent any significant impacts occurring.

The EIS also needs to make reference to facility precinct measures to manage hazardous substances and to avoid or mitigate potential oil and hazardous substance spills or contamination into the adjacent Port River and waterways. This should highlight the need to ensure facility arrangements and responsibilities that manage, respond and recover to oil and noxious substance spills that may impact, or are likely to impact, South Australia's coastal waters.

Response:

The Proponent acknowledges the comment regarding hazardous substances and DITs role for marine spill response under the South Australian Marine Spill Contingency Action Plan (SAMSCAP).

The matters raised regarding the management of hazardous substances, including measures to prevent and respond to potential spills, have been documented within the EIS in multiple chapters, including Chapter 12: Marine Flora and Fauna, Chapter 13: Terrestrial Flora and Fauna, Chapter 16: Waste Management, Chapter 19: Contamination and Chapter 21: Surface Water and Groundwater Quality.

	<p>These sections outline the proposals measures to manage hazardous substances, mitigate potential spills, and ensure appropriate response and recovery mechanisms are in place to prevent impacts to the Port River and waterways.</p> <p>As such, the Proponent considers that the EIS has appropriately addressed the relevant considerations within its scope.</p>
<p>The information about dredging activities also needs to provide references of specific land parcel number between the existing riverbank and shipping channel. This is to assure that these activities are not affecting or within the broader Port Operating Agreement area for Port Adelaide.</p>	<p><u>Response:</u></p> <p>The Proponent acknowledges the comment regarding land parcel extent and the broader Port Operating Agreement area for Port Adelaide.</p> <p>The dredging activities have been planned to ensure that all relevant land parcels have been appropriately captured as part of the gazettal process for the proposal as Impact Assessment development.</p> <p>Additionally, any remaining matters related to final dredging activities will be addressed through reserved matters in consultation with and as agreed with the EPA, as further assessment and approvals will be undertaken and provided to the EPA as part of the dredging and disposal licence application under the <i>Environment Protection Act 1993</i>. The requirement for the Project to obtain a dredging licence is anticipated to be a Reserved Matter in the development approval.</p>
<p><u>Land Tenure</u></p>	
<p>The development of the coastal edge into the submarine launch facility, wet basin and wharf will require piling to establish foundations and stabilise the area for development. This application excludes dredging of the Port River Channel and only relates to dredging that is required to accommodate the launch facility, wet basin and wharf.</p>	<p>Acknowledged. No response required.</p>
<p>The Department assumes that the “hardening of the coastal edges to accommodate marine infrastructure” in Area 3 will only occur within the boundaries of CT 6295/379 and CT 5856/14.</p> <p>In the event that this is not the case, the Department is highlighting that, on the understanding that this infrastructure must be located on land owned by Australian Naval</p>	<p><u>Response:</u></p> <p>The Proponent acknowledges the comment regarding land parcel extent and the broader Port Operating Agreement area for Port Adelaide.</p> <p>The current design of the proposal shows that all marine infrastructure works within</p>

Infrastructure (ANI), a transfer of seabed land between the Minister for Infrastructure and ANI would be required. In addition, as occurred with the recent acquisition by ANI of the seabed land described in CT 6295/379, the required area would have to be excised from the existing Port Operating Agreement by amending the Harbors and Navigation Regulations 2023. This process will require Cabinet’s and the Governor’s approval.

Area 3 will be located within the boundaries of CT6289/763, CT6295/379, and CT5856/14. The boundary of the CT 6295/379 extends approximately 90m from land within CT6289/763 and this provides sufficient area to provide the marine infrastructure within Area 3. However, it is acknowledged that this is subject to change as part of the evolving design of the proposal and should works need to extend beyond CT 6295/379 would be subject to additional consideration and approval processes.

From the documentations provided, it is also difficult to determine if the proposed dredging will take place entirely within the confines of CT’s 6295/379 or CT 5856/14.

In the event that this is not the case, ANI will be required to liaise with Flinders Ports as the designated Port Operator for any related permits which may also require the consent of the Minister for Infrastructure and Transport.

In view of the above, clarification of the location of these works is required.

Response:

The Proponent acknowledges the comment regarding dredging extent.

The current design of the proposal shows that all marine infrastructure works within Area 3 will be located within the boundaries of CT6289/763, CT6295/379, and CT5856/14. The boundary of the CT 6295/379 extends approximately 90m from land within CT6289/763 and this provides sufficient area to provide the marine infrastructure within Area 3.

However, it is acknowledged that this is subject to change as part of the evolving design of the proposal and should works need to extend beyond CT 6295/379 would be subject to additional consideration and approval processes.

Noise and Vibration

With respect to noise and vibration, it is noted that table 63 of the report states that “It is the responsibility of DIT to implement suitable noise mitigation as required” for “Traffic noise from operation of the SCY facilities on residential and other sensitive receptors”. This statement is not correct. It is the responsibility of the proponent to consider and outline any measures both during construction and operational phases of the SCY.

Response:

The Proponent acknowledges the comment regarding noise and vibration and appreciates the opportunity to clarify the statement in Table 63.

It is acknowledged that the Proponent is responsible for identifying and addressing potential noise and vibration impacts during both the construction and operational phases of the SCY on the SCY site itself, including outlining appropriate mitigation measures.

The reference in Table 63 relates specifically to traffic noise generated on the broader public road network, beyond the SCY site itself. In this context, it is understood that DIT

	<p>is responsible for implementing noise mitigation measures where infrastructure upgrades are identified as being required, in accordance with the Road Traffic Noise Guidelines (RTNG), for roads under its care and control. Such mitigation would typically be triggered if road upgrades meet the thresholds outlined in the RTNG.</p>
<p><u>Stormwater</u></p>	
<p>The Stormwater Management Plan states there are three DN1050 pipes under the train line to link the basins to the western side to Falie Reserve basin. However, DIT records shows that only one pipe was installed. Consequently, it is necessary for the applicant to confirm the number of pipes and update the stormwater modelling if required.</p> <p>It is noted that there is an existing swale on the eastern side of Pelican Point Road that terminates near the southern end of the Quantem site. It is unclear if this swale will discharge into the existing western basin. This will need to be confirmed.</p>	<p><u>Response:</u></p> <p>The Proponent acknowledges the comment regarding stormwater.</p> <p>The Stormwater Management Plan has been developed based on the best available information at this stage of the project. As detailed design progresses, the final stormwater management approach, including confirmation of existing infrastructure and any necessary refinements to the stormwater modelling, will be further reviewed and discussed with relevant agencies.</p> <p>Regarding the DN1050 pipes, the information for the DN1050 was obtained from the DRAINS model that was prepared for the Northern Lefevre Peninsula Strategic Stormwater Plan (GHD, 2022). As part of the detail design, the design team will verify all existing conditions, and if discrepancies are identified, the stormwater modelling will be updated accordingly in consultation with DIT and other agencies. Similarly, the function and discharge of the existing swale near the Quantem site will be confirmed as part of the detailed design phase to ensure effective integration with the broader stormwater management strategy.</p> <p>These matters will be secured through planning conditions on the development application, ensuring that all necessary verification and refinements are undertaken prior to construction. Ongoing coordination with agencies will continue to ensure that the final stormwater management plan meets all relevant requirements and maintains effective drainage outcomes.</p>
<p><u>Security</u></p>	

The EIS does not indicate potential effects of precinct (perimeter) security arrangements that may impact the public domain and transport networks. Whilst discussions have occurred between agencies, these are indicative and future determination of planning for security arrangements should consider not impacting the wider transport networks.

Response:

The Proponent acknowledges the comment regarding security and the transport network.

The EIS has considered the potential impacts of the proposal on the transport network, including access and road functionality. While the comment raises concerns about the potential influence of perimeter security arrangements on the public domain and transport systems, the assessment to date has not identified any evidence to support this concern.

There have been ongoing discussions with relevant agencies, including DIT, regarding security requirements. To date, no significant issues have been raised in relation to impacts on the transport network. Future planning and determination of security measures will continue to involve key stakeholders to ensure alignment with broader transport and planning objectives.

At this stage, there is no indication that the proposed security arrangements will adversely affect the transport network. Should any mitigation measures be required, they will be addressed through established coordination and approval processes.

Department of Primary Industries and Regions

PIRSA comment

Proponent/technical subconsultant response

General comments

In general, the document is focussed on biosecurity risks at the development site (sensitive receptors). Assessing all risk against the sensitive receptors is unhelpful. Given the substantial number of marine and terrestrial pest species already present at the proposed development site, the EIS should be adjusted to better consider the risks of transporting pests or diseases from the site to other areas throughout the state. For example, in the marine context, risks include possible movement of pests/disease from the Port River to other areas during sea trials.

Response: The purpose of the EIS and the broader Environmental Impact Assessment (EIA) process is to evaluate the potential effects of a proposed development on the environment, with a focus on the development site and its immediate surroundings. This approach aligns with standard EIA methodologies, which assess environmental impacts in relation to identified sensitive receptors.

Sensitive receptors are typically defined as environmental features, ecosystems, or communities that may be affected by a development. In the context of biosecurity, this means assessing the potential for

introduced pests or diseases to impact receptors within or in proximity to the development site.

The assessment presented in the EIS follows this established methodology by focusing on the risks posed to the development site and its surrounding environment (including the Port River). The EIS also acknowledges broader biosecurity considerations and outlines the comprehensive management measures that will be implemented through the Biosecurity Management Plans (BMPs) to prevent the introduction and spread of marine and terrestrial pests. These measures ensure that construction and operational activities, including submarine vessel movements, do not contribute to the transport of pests or diseases to other locations. Given these robust controls, which will be secured by planning condition on the development approval, the risks of off-site pest or disease transfer have been appropriately addressed and mitigated within the EIS. As such, the primary function of the EIA and EIS as decision-making tools in planning, used to evaluate and mitigate the potential environmental effects of a proposal, has been fulfilled

The introduction of a new pest to a sensitive receptor may also have flow on impacts if it is then spread from the receptor to further locations throughout the state. In the marine context, risk is created due to high vessel traffic within the Port River.

Response: The EIS acknowledges the potential risk of pest introduction to sensitive receptors and the possibility of further spread. However, the EIS also outlines management measures, including BMPs, that will be implemented to prevent such occurrences.

In the marine context, while vessel traffic within the Port River is high, the submarines will be constructed on-site and launched directly into the Port River. The development will not generate high vessel traffic, as there will be no docking of vessels from overseas or interstate at the subject site. This is not feasible for two key reasons. During construction, no docking facilities will be available, as the development itself will not yet exist. Likewise, during operation, the development is not designed to accommodate container ships or facilitate the direct delivery of significant quantities of materials by sea.

While some vessels will transport goods and materials for the development, these vessels will not be owned or operated by ANI, nor will they dock at the development site or the existing ONS facility as outlined above. All operational maritime vessel movements related to material deliveries will be coordinated with the Port Operator (Flinders Ports), following standard practices for importing materials into South Australia and in full compliance with regulatory biosecurity requirements.

Given these considerations, the potential for pests to spread from the site to other locations throughout the State has been addressed in the EIS, with further detail to be provided in the forthcoming BMPs which would be secured by condition.

Additionally, any biosecurity risks associated with general imports into Port are managed under existing regulatory requirements and industry frameworks. As such, broader biosecurity controls for vessel movements and imported materials fall under established State and national biosecurity regulations.

There is a risk of introduction of pest species present at other ports or defence facilities within Australia via transport on vessels servicing the development (e.g. *Didemnum vexillum*). *Didemnum vexillum* is an important and relatively new biosecurity incursion in Australia and so existing standard mitigation measures are unlikely to sufficiently address risk related to this species.

Response: The comments raised are incorrect as they assume that materials for both the construction and operation of the development would be transported directly to the site by vessel. This is not feasible for two key reasons. During construction, no docking facilities will be available, as the development itself will not yet exist. Likewise, during operation, the development is not designed to accommodate container ships or facilitate the direct delivery of significant quantities of materials by sea.

Additionally, as outlined in Chapters 1 to 6 of the EIS, once a submarine has been constructed, commissioned and released to the Royal Australian Navy, it will not return to the NPSCY for maintenance or servicing. All ongoing maintenance and sustainment activities will take place at alternative locations, ensuring vessel movements associated with the development are limited to the initial construction and commissioning phase. This approach minimizes ongoing operational interactions with the subject site

and reduces potential biosecurity risks related to vessel return and servicing.

As previously stated in the comments above, while some ships will transport goods and materials for the development into the Port, these vessels will not be owned or operated by ANI and will not dock at the development site or the existing ONS facility. All maritime vessel movements related to material deliveries will be coordinated with the Port Operator (Flinders Ports), following standard practices for importing materials into South Australia and complying fully with regulatory biosecurity requirements.

As such, any biosecurity risks associated with general imports into the Port will be managed under existing regulatory requirements and industry frameworks and are outside the scope of the EIS.

Consideration should be given to how any potential incursion could be managed with state and/or national regulators given the sensitive nature of the facilities.

Response: As previously outlined, given that materials for both the construction and operation of the development will not be transported directly to the site by vessel, the potential incursion of *Didemnum vexillum* is not considered a direct risk associated with this development or the subject site. The coordination of material deliveries to the Port with the Port Operator (Flinders Ports) ensures adherence to standard importation and biosecurity protocols already in place within South Australia.

Any biosecurity risks related to general imports into the Port, including the management of marine pest incursions, are governed by existing regulatory frameworks and industry standards. As such, engagement with State and/or Commonwealth regulators on this matter falls within the remit of broader biosecurity management of PIRSA and Flinders Ports rather than the specific scope of this EIS or ANI.

The EIS should specifically state that Biosecurity Management Plans will be reviewed/approved by PIRSA.

Response: The requirement for BMPs to be reviewed and approved by PIRSA will be secured through conditions on the development approval. As such, it is not necessary for the EIS to explicitly state this requirement. The EIS outlines the commitment to developing BMPs to manage biosecurity risks, with the approval process

	<p>to be addressed as part of the regulatory framework associated with the development.</p>
<p>Specific comments</p>	
<p>Pg 196/197: Vertebrate pest mitigation should be considered during both construction on operational embedded mitigation measures.</p>	<p>Response: Noted. As outlined in Chapter 11: Biosecurity (Chapter 11), BMPs will be developed as part of the Construction Environmental Management Plans (CEMPs) and Operational Environmental Management Plans (OEMPs) for the development. The BMPs will outline specific strategies and procedures for managing and mitigating biosecurity risks during both construction and operation, ensuring alignment with existing terrestrial and marine biosecurity industry practices.</p> <p>The BMPs are intended to be comprehensive. While vertebrate pest mitigation is not explicitly stated in the text of the EIS, it is not excluded from consideration.</p> <p>The development of CEMPs and OEMPs, including the BMPs, will be a condition of the development approval. Further consultation on the detailed management plans will be undertaken with relevant agencies, including PIRSA, at the appropriate time before construction or operation commencing.</p>
<p>Pg 197: Marine pest and disease mitigation should be considered during operational embedded mitigation measures as part of ongoing operational maintenance.</p>	<p>Response: Please see response above.</p> <p>The BMPs are intended to be comprehensive. While marine pest and disease mitigation is not explicitly stated in the text of the EIS, it is not excluded from consideration.</p>
<p>Pg 197: Consideration of declared plants should also take into account vehicles/machinery/equipment being used on site and then leaving the site. BMPs should outline vehicle and equipment hygiene procedures for both entering and leaving the site.</p>	<p>Response: Please see response above.</p> <p>The BMPs are intended to be comprehensive. While declared plants mitigation is not explicitly stated in the text of the EIS, it is not excluded from consideration.</p> <p>Additionally, as stated within Chapter 11, one of the first activities during site preparation and clearance activities during the construction phase of the development would be to eradicate all Declared Plants and other weeds within the construction area. Following their removal, ongoing management of the construction site would</p>

occur through procedures captured in a BMPs as part of the CEMPs. It is also noted within Chapter 11, site soils and material sourced for fill would be managed in accordance with a Materials Management Plan, part of the CEMPs, which will be consistent with industry-standard best practices. These management plans will ensure that the necessary management measures for weeds, including Declared Plants, is implemented.

Response: It is assumed that PIRSA has reviewed the EIS in full, including Chapter 6: Impact Assessment Methodology (Chapter 6), which outlines the assessment framework used in the EIS. However, this comment suggests that further clarification on the applied methodology may be beneficial.

In EIA practice, significance is determined by the relationship between the magnitude of an impact and the sensitivity of the affected resource or receptor. Section 11.7.1 of Chapter 11 notes that much of the terrestrial environment of the subject site is already degraded due to weed incursion, including Declared Plants.

The development may initially contribute to a short-term risk of spreading pest plants and animals within the subject site and surrounding areas. However, this impact will be managed through standard procedures detailed in the BMPs, as part of the CEMPs.

Over the longer term the development may have a positive effect on pest fauna distribution by reducing suitable habitat through clearance, increased human activity, artificial lighting and other management measures.

Given the above, the potential magnitude of impact of spreading pest plants and animals is classified as Very Low, and the terrestrial environment is classified as Very Low Sensitivity due to its existing level of disturbance.

Based on Table 6.4 in Chapter 6, a Very Low Sensitivity Receptor experiencing a Very Low Magnitude of Impact results in a Negligible Significance of Effect.

Pg 198: It is unclear why the spread of terrestrial pest plants and animals would be considered a short term, negligible effect given that several nationally significant pest plant species have been recorded at the site – need to consider the impacts if these species were spread to a sensitive area off site as a result of the development.

As outlined in Chapter 6, construction phase impacts are classified as:

- Short-term: Up to 2 years
- Medium-term: 2 to 5 years
- Long-term: More than 5 years

Since the potential for pest plant and animal spread primarily exists in the first two years of construction, before habitat conditions change due to clearance and site development, the impact is classified as short-term. The removal of Declared Plants and weeds during construction and the establishment of hardstand areas will further reduce the subject site's suitability for pest species over time.

Thus, the Negligible significance of effect and Short-Term classification are consistent with the EIS methodology and standard EIA practice.

Pg 198: The Port River is a disturbed environment; however, it is also subject to a high level of vessel traffic. If a new marine pest was introduced into the Port River, there is risk that vessel traffic would see it spread to other sensitive areas.

Response: This concern appears to be based on the assumption that vessels will transport materials directly to the subject site, which is not the case as previously outlined in comments above. No overseas or interstate vessels will dock at the subject site for either construction or operational activities. As such, the introduction of a new marine pest it is not considered a direct risk associated with this development or the subject site that could occur. The coordination of material deliveries to the Port with the Port Operator (Flinders Ports) ensures adherence to standard importation and biosecurity protocols already in place within South Australia.

Any biosecurity risks related to general imports into the Port, including the management of new marine pest incursions, will be governed by existing regulatory frameworks and industry standards. As such, engagement with State and/or Commonwealth regulators on this matter falls within the remit of broader biosecurity management of PIRSA and Flinders Ports rather than the specific scope of this EIS or ANI.

Pg 199 (and throughout): It is unlikely that the introduction of marine pests would result in a short-term effect, eradication of new incursions

Response: The Proponent acknowledges the challenges associated with the eradication of marine pests, particularly in the Port River,

of marine pests most often do not result in eradication.

as outlined in Chapter 11. While eradication of many existing species in the area is not considered feasible, it is important to prevent their spread and avoid introducing new invasive species. This is the primary focus of the EIS assessment.

As noted previously, no overseas or interstate vessels will dock at the subject site, meaning that the introduction of a new marine pest through such vessels is not a direct risk associated with this development. The only potential for new invasive species introduction would arise from dredging activities in Area 3.

However, dredging equipment will be sourced from interstate (not overseas), and any dredging vessel procured must adhere to stringent biosecurity protocols, including:

1. Complying with biosecurity requirements under the *Biosecurity Act*, *Australian Ballast Water Management Requirements*, and Flinders Ports protocols before arriving at the Port. These regulatory frameworks, which are outside the control of the Proponent, reduce or eliminate the risk of introducing new marine pests.
2. Upon arrival at the Port, the dredging vessel will implement the Dredge Management Plan (DMP) for the development, which will include a detailed BMP prepared in consultation with PIRSA. This further mitigates the risk of introducing new pests during dredging operations.

Given that dredging will occur over a period of weeks or months, and will be subject to rigorous biosecurity controls, any potential impact from the introduction of a new marine pest is a short-term effect (i.e., short-term less than two years as outlined in Chapter 6).

Thus, the potential risk of marine pest introduction is limited to a short-term effect during dredging, with significant mitigation measures in place to reduce this risk and effect to Negligible.

Pg 201: Assessment should consider how long submarines are in-water for fit out etc. prior to sea trials or delivery. Accumulation of biofouling during this time could result in spread of marine

Response: The EIS has considered the potential for biofouling accumulation during the fit out of the submarine. However, this is not considered a significant risk or impact,

pests/disease from the Port River to other locations. If in-water cleaning is required (hull grooming or removal of macrofouling) this must also meet requirements of the Fisheries Management Act.

as the Royal Australian Navy adheres to comprehensive biofouling management protocols that minimize hull fouling during fit-out and commissioning. These protocols, which will be integrated into the BMP for the OEMP, ensure that hull antifouling coatings are maintained in optimal condition to minimize biofouling growth while the submarine is in the water during commission and fit out.

As the submarine would be launched directly into the Port River, any biofouling that has accumulated on the hull would only have been exposed to Port River waters. Therefore, any in-water cleaning required (such as hull grooming or macrofouling removal) would not introduce new biofouling or invasive species into the Port River. The in-water cleaning process will not change the baseline conditions, nor will it increase the risk of spreading invasive aquatic pests.

Additionally, if in-water cleaning is required, it will comply with all relevant regulatory frameworks, including the *Fisheries Management Act* and other biosecurity regulations, to ensure that no marine pests or diseases are introduced into the environment.

Given these mitigation measures and the controlled nature of submarine maintenance activities during fit out and commissioning, the risk of biofouling accumulation leading to the spread of marine pests or diseases is negligible and is effectively managed through the OEMP and BMP.

Pg 201: Should consider area of sea trials and proximity to commercial aquaculture operations that may be impacted by the spread of marine pests/disease.

Response: Sea trials of the submarines will be conducted in full compliance with State and Commonwealth marine biosecurity regulations. These biosecurity measures are designed to prevent the spread of marine pests and diseases, and there is no evidence to suggest that the submarine's sea trials would increase the risk of such spread.

Additionally, the risk of marine pest or disease transmission during the sea trials is negligible when compared to the existing baseline conditions in the Port River, which

	<p>already supports between 1,000 and 2,500⁷ vessels annually. Given that these vessels, including interstate and overseas ships, operate in the same waters, the presence of a single submarine would not pose a unique or increased risk to marine biosecurity, nor would it exacerbate impacts on commercial aquaculture operations.</p> <p>Furthermore, as the submarine is built and launched directly into the Port River, the biofouling on its hull will only have been exposed to Port River waters. As a result, there is no added risk of introducing new marine pests or diseases from the submarine's activities.</p> <p>The State and Commonwealths existing marine biosecurity frameworks are robust and comprehensive, and these protocols will be adhered to throughout the sea trials and any associated activities. Therefore, there is no justification to delay or stall the project based on concerns about the spread of marine pests or disease, particularly given the extensive and ongoing vessel traffic in the area.</p>
<p>Appendix 1.5 Biosecurity Report: Should also consider state guidelines on biofouling. Significant resources available on PIRSA website, including for in-water cleaning.</p>	<p>Response: The Biosecurity Report references several guidelines including national and state biofouling guidelines. The PIRSA In-water cleaning guidelines (Dec 2024) were not available at the time of issuing the Biosecurity Report (Oct 2024). Where relevant, these guidelines can be utilised in the creation of the BMPs that form part of the OEMP.</p>
<p>Appendix 1.5 Biosecurity Report: Section 6.2.1. the Livestock Act 1997 is the primary legislation for notifiable pathogens.</p>	<p>Response: The Livestock Act and its relevant provisions (notifiable disease) are described in the Biosecurity Report on pages 13, 21 & 23.</p>
<p>Appendix 1.5 Biosecurity Report: The EIS notes that the biosecurity risk from bilge water is low, rather, the risks it poses centre around water pollution. Can the risk assessment be included to support this estimation or a suitable reference.</p>	<p>Response: As previously outlined, the risk associated with bilge water is considered to be low for this development, primarily due to the fact that no overseas or interstate vessels will dock at the subject site. Therefore, the introduction of bilge water as a biosecurity risk is not deemed a direct impact for the development or subject site.</p>

⁷ Based on information from [Shipnet](#) and [Australian Maritime Safety Authority](#) for 2021.

Any biosecurity risks associated with general imports into the Port, including the management of bilge water, will be managed in accordance with established regulatory frameworks, including the *EPA Code of Practice for Vessel and Facility Management (Marine and Inland Waters) 2019* and other relevant industry standards. These frameworks are designed to address water pollution risks and biosecurity threats.

The EIS also assesses the potential for bilge water spillage during dredging activities in Area 3. However, it is important to note that the dredging equipment will be sourced from interstate, not overseas. The dredging vessel will be required to:

1. Comply with biosecurity requirements under the *Biosecurity Act, Australian Ballast Water Management Requirements*, and Flinders Ports protocols before arriving at the Port. These regulatory frameworks, which are outside the control of the Proponent, reduce or eliminate the risk of introducing new marine pests.

2. Upon arrival at the Port, the dredging vessel will implement the DMP for the development, which will include a detailed BMP prepared in consultation with PIRSA. This further reduces the risk of biosecurity concerns, including bilge water spillage and introduction of new pests during dredging operations.

Through these robust biosecurity measures, the risk associated with bilge water is effectively managed in accordance with regulatory requirements, and the likelihood of significant biosecurity impacts is low resulting in a negligible effect.

Appendix 1.5 Biosecurity Report: Notes that Government and Defence vessels are exempt from a Ballast Water Management Plan and Certificate Requirements. Noting that non-defence vessels will be engaged on this project and considering best practice, the Biosecurity Management Plan should still consider ballast and bilge water (particularly discharge in sensitive areas). In addition, the Commonwealth (DAFF) has an expectation of all visiting international and domestic military vessels, or vessels that fall under Article 3.2(e) of the ballast

Response: The comments raised are incorrect as they assume that materials for both the construction and operation of the development would be transported directly to the subject site by vessel. This is not feasible for two key reasons. During construction, no docking facilities will be available, as the development itself will not yet exist. Likewise, during operation, the development is not designed to accommodate container ships or facilitate

water convention and the Biosecurity Act 2015 - Sect 263(a) undertake measures to manage any biosecurity risk that may be related to the vessel's ballast water management.

the direct delivery of significant quantities of materials by sea.

The coordination of any vessel that is delivering materials for use in the development or at the subject site will be with the Port Operator (Flinders Ports), as vessels would be docking within the Port, and will have to ensure adherence to standard importation and biosecurity protocols already in place within South Australia.

Any biosecurity risks related to general imports into the Port, including the management of ballast and bilge water, will be governed by existing regulatory frameworks, including the *EPA Code of Practice for vessel and facility management (marine and inland waters) 2019*, and industry standards.

Appendix 1.5 Biosecurity Report: marine pest reporting processes need to include reporting to state authorities (PIRSA).

Response: This is already outlined in the Biosecurity Report, page 23, "*Report Declared Noxious species to PIRSA.*"

Appendix 1.5 Biosecurity Report: The Asian Date Mussel (ADM) is listed to have been recorded 15 times within 5km of the development site, however, these detections were the result of cross reactivity in the previous assay. A new assay has since been developed by SARDI and the samples re-tested which all returned negative for the ADM.

Response: Thank you for the new information. This information can be reflected in the production of the BMPs, where relevant. However, this new information does not result in a material change to the findings of the Biosecurity Report nor EIS.

Appendix 1.5 Biosecurity Report: Table 7 and Figure 3 - PIRSA appreciate that the Biosecurity Management Plan and Dredge Management Plan are yet to be developed. PIRSA note that during its development, PIRSA will be consulted.

Response: This is correct. Further assessment and approvals will be undertaken and provided to the EPA as part of the dredging and disposal licence application under the *Environment Protection Act 1993*. The requirement for the proposal to obtain a dredging licence will be a reserved matter in the development approval. As part of the dredging and disposal licence application the DMP, which will include a BMP, will be prepared and consulted on with agencies, including PIRSA.

Appendix 1.5 Biosecurity Report: Section 7 – "The recommended management measures, in contrast, are derived from subordinate legislative instruments (e.g. guidelines) or developed by experts to achieve compliance against the relevant Acts and Regulations. These management measures are optional and not

response: All Management Plans are expected to be secured through planning conditions or reserved matters and will require consultation and approval from the relevant agencies.

enforced under South Australian and/or Commonwealth law.” If recommend management measures are implemented to achieve compliance against the relevant Acts and Regulations, then they are enforceable under legislation.

As such, these become enforceable under the development approval, as well as any relevant legislation that requires their implementation to mitigate adverse impacts on the environment. This ensures that the Proponent adheres to the specified measures to mitigate adverse environmental impacts.

Appendix 2: The development of a Biosecurity Management Plan is noted but no detail is provided on how the Plan will be assessed for suitability. As above, suggest that Biosecurity Management Plans will be reviewed/approved by PIRSA, particularly as only high-level consideration of how biosecurity risks will be mitigated is provided in the Environmental Impact Statement, substantial mitigation measures are suggested in Appendix 1.5 Biosecurity Report, and risks have not been fully considered in the Environmental Impact Statement (outside of sensitive receptors).

Response: As previously outlined, the requirement for BMPs to be reviewed and approved by PIRSA will be secured through conditions on the planning approval. As such, it is not necessary for the EIS to explicitly state this requirement. The EIS outlines the commitment to developing BMPs to manage biosecurity risks, with the approval process to be addressed as part of the regulatory framework associated with the development.

Regarding the assertion that biosecurity risks have not been fully considered in the EIS, the Proponent respectfully disagrees. The EIS thoroughly addresses potential biosecurity risks and outlines mitigation measures in line with industry best practices. Several of the comments from PIRSA appear to be based on the assumption that materials for construction and operation would be transported directly to the subject site by overseas or interstate vessels. However, the EIS clearly states that no overseas or interstate vessels will dock at the subject site, which significantly mitigates biosecurity risks associated with vessel traffic.

Had PIRSA fully reviewed the detailed information provided in the EIS, it is likely that some of the comments would not have been raised, as they appear to be based on misconceptions or factors not directly relevant to this specific development.

Appendix 2: Timing is stated as “prior to operations commencing”. Sufficient time should be allowed for meaningful consideration, feedback, and edits to Biosecurity Management Plan.

Response: This is noted. The requirement for BMPs to be reviewed and approved by PIRSA will be secured through conditions on the planning approval. Given the engagement and consultation will have to occur with numerous agencies on Management Plans, it will be up to the Proponent to ensure that management

plans are provided to agencies with sufficient time for review and feedback.

Environment Protection Authority

EPA comment	Proponent/technical subconsultant response
Air quality	
<p>The EPA reviewed the Nuclear Powered Submarine Construction Yard Air Quality Assessment (28 November 2024), prepared by Vipac engineers and Scientists Limited. The air quality assessment has not demonstrated that all applicable criteria in the Environment Protection (Air Quality) Policy 2016 would be met.</p> <p>Some pollutants have multiple ground level concentration (GLC) criteria in the Environment Protection (Air Quality) Policy 2016, with different averaging times, and the proposal should demonstrate that all criteria would be complied with. It is also noted that 'Table 3-2 Air Quality EPP Maximum Ground Level Concentrations' is missing the following criteria:</p> <ul style="list-style-type: none"> - 12-month GLC criterion for benzene (10 µg/m³) - 12-month GLC criterion for benzo(a)pyrene (0.3 nanograms/m³). It is incorrectly stated in the table that 0.8 µg/m³ is the 12-month average GLC; this is the 3-minute average GLC. <p>For some pollutants, the assessment has only considered the 3-minute average GLC, not GLCs with other averaging times. Compliance with the 3-minute average GLC for a pollutant does not necessarily mean that the other GLCs (with different averaging periods) will also be met. In some cases, it can be inferred from the maximum predicted 3-minute average pollutant concentrations that the other GLCs will be met (for example, it can be inferred from the maximum predicted 3-minute average benzene concentrations that the 12-month criteria can also be met, even though it wasn't assessed).</p> <p>However, this is not the case with benzo(a)pyrene, which has a 12-month GLC of 0.3 nanograms/m³ (0.0003 µg/m³). The predicted maximum 3-minute average concentrations at sensitive receivers are greater than this, so are insufficient to demonstrate the 12-month criteria can be met. Hence, it still needs</p>	<p>Response: Vipac proposes to update Table 3-2 of Appendix 1.1: Air Quality Assessment to include the missing criteria identified by the EPA as follows:</p> <ul style="list-style-type: none"> • 12-month GLC criterion for benzene (10 µg/m³) • 12-month GLC criterion for benzo(a)pyrene (0.3 nanograms/m³) and 0.8 µg/m³ as the 3-minute average GLC. <p>In addition, Section 6.3 and relevant Appendices of Appendix 1.1 will be updated to include a comparison of the predicted concentrations of these pollutants with the annual average criteria. An additional table demonstrating that the 12 month GLC of these pollutants have been met will be incorporated into Appendix 1.1, and is included as Appendix B for the EPA review.</p> <p>Response: The proposed updates to Appendix 1.1 of the EIS, as outlined in the Vipac response above, have been reviewed in the context of the significance assessment provided in Chapter 7: Air Quality of the EIS. URPS confirms that no updates to Chapter 7 are required as the amendments to Appendix 1.1 remain consistent with the previous assessment (i.e., no exceedances of the relevant pollutant criteria under the Environment Protection (Air Quality) Policy 2016). Consequently, there is no change to the Magnitude of Impact or Significance of Effect.</p>

<p>to be demonstrated the 12-month benzo(a)pyrene GLC can be met.</p>	
<p>Noise</p>	
<p>The EPA reviewed the Noise and vibration technical report (A240248RP1 Revision B, 28 November 2024) prepared by Resonate (noise report).</p> <p>Whilst the report is generally acceptable, there is a minor information omission that should be addressed. The noise report needs to include Lmax predictions for residential receivers in areas defined as quiet localities.</p> <p>It is important to note that the noise report was not reviewed in relation to road traffic noise or noise impacts on terrestrial or marine fauna as these are excluded from the Environment Protection (Commercial and Industrial Noise) Policy 2023.</p>	<p>Response: Resonate proposes to update Appendix 1.2: Noise and Vibration Assessment to include a new section under Section 6.3: Predicted Noise Levels to address the predicted Lmax at the nearest affected receivers, which will also include a table of results similar to that presented for the predicted Leq.</p> <p>Response: The proposed updates to the Appendix 1.2 of the EIS, as outlined in the Resonate response above, have been reviewed in the context of the significance assessment provided in Chapter 8: Noise and Vibration of the EIS. Given that existing Lmax events are significantly above the criterion in most cases (see Tables 5 to 7 in Appendix 1.2 for baseline noise levels) due to road traffic, the predicted Lmax at the nearest affected receivers is not expected to differ from the existing baseline as a result of the Project.</p> <p>A minor update to Table 8.11: Predicted Noise Levels in Chapter 8 of the EIS is required to include the predicted Lmax levels that will be provided within the updated Appendix 1.2. However, as the relevant Noise EPP criteria for Lmax are expected to be met, no change to the Magnitude of Impact or Significance of Effect is required.</p>
<p>Waste</p>	
<p>No further questions or comments are required, sufficient information has been provided at this stage.</p> <p>The EPA advises that a licence may be required under the Environment Protection Act 1993.</p> <p>Radiation – See comment in HR5 regarding Appendix 1.11 Waste management</p>	<p>Response: Thank you for your confirmation. Please feel free to reach out if any further clarification is needed.</p>
<p>Site and Groundwater Contamination</p>	
<p>Radiation – It is noted that uranium or ‘radionuclides’ was not included in the site contamination assessment. Radionuclides are a listed substance in the Environment Protection Regulations 2023. The EPA acknowledges that it</p>	<p>Response: As discussed in the workshop meeting and outlined in Chapter 4 of the EIS, the ARPANSA licensing requirements for the Project necessitate establishing radiological baseline conditions at the development site</p>

is unlikely that an activity involving those substances occurred within the defined area but, it was an opportunity to capture the existing concentrations of uranium given that a nuclear activity is proposed.

and maintaining through-life monitoring. This ensures that any deviations from the baseline can be detected and quantified.

ANI has confirmed that the Radiological Baseline Assessment of the site and its surroundings is currently underway. This assessment will be incorporated into the Siting and Site Evaluation studies for the Project as part of the ARPANSA licensing requirements.

Site contamination - A sufficient and proportionate assessment of site contamination has yet to be undertaken at the site with known data gaps listed in the Physical Environment EIS Report (JBS&G 2024) provided in Appendix 1.14. The EPA understands that these data gaps are proposed to be addressed through further site contamination assessment outlined in the Sampling, Analysis and Quality Plan for Additional Targeted Site Contamination Assessment provided in Appendix B of the Environmental Impact Statement (EIS).

Any further site contamination assessment must be sufficient to identify:

- a) the nature and extent of any site contamination present or remaining on or below the surface of the land
- b) the likely suitability of the land for the proposed use
- c) what remediation (if any) is necessary for the proposed use.

The EPA notes that methane, a volatile contaminant, has been detected in wells across the site. The site contamination consultant identified that the presence of methane poses a potential risk to human health via the inhalation pathway. The EPA acknowledges that further assessment will be conducted, including the evaluations outlined in the Sampling, Analysis, and Quality Plan (SAQP) for Hazardous Ground Gas, provided in Appendix C of the EIS.

Response: As discussed in the workshop meeting, since the submission of the EIS, ANI and JBS&G have been undertaking further work to address known data gaps.

Appendix C and includes the following reports:

- Addendum to Site Contamination Assessment.
- Hazardous Ground Gas (HGG) Assessment for Area 1 and Area 2.

These reports serve as addendums to the Site Contamination Assessment included as Appendix A of Appendix 1.14: Physical Environment, with the completed works aligning with those outlined by JBS&G in Appendices B and C of Appendix 1.14.

As noted in the workshop meeting, the only remaining work to be completed is the HGG assessment for Area 3. This assessment is scheduled for completion in 2025, following the cessation of dredge pond use (expected by the end of April 2025), as raised groundwater levels at the time of assessment prevented its completion alongside Areas 1 and 2. However, given the findings of the HGG Assessment for Areas 1 and 2, it is not anticipated that the results for Area 3 will differ significantly.

The above should address the EPA's concerns regarding data gaps and provide sufficient confidence that the Project can proceed with appropriate design mitigation in place. Note, once the HGG Assessment for Area 3 has been completed, the report will be provided to the EPA.

Additionally, these addendums to the Site Contamination Assessment, i.e., Appendix C

	<p>and D, have been reviewed in the context of the significance assessment provided in Chapter 19: Contamination of the EIS. URPS confirms that no updates to Chapter 19 are required, as the findings of these reports do not alter the previously assessed Magnitude of Impact or Significance of Effect.</p>
<p>The EPA notes that with regard to the assessment of groundwater, the site contamination consultant has applied the PFAS National Environmental Management Plan (version 2.0, dated January 2020) (NEMP) and Australian and New Zealand guidelines for fresh and marine water quality (2018) (ANZG) 95% species protection default guideline values for fresh and marine waters, which are applicable to slightly to moderately disturbed ecosystems. However, the EPA considers that the Port River Estuary is a sensitive environment of ecological significance which includes high value conservation reserves. Therefore, the 99% species protection default guideline value, specifically designed for high ecological/conservation value systems, must be adopted for the EIS and any future assessments, risk assessments and management plans.</p>	<p>Response: JBS&G have considered the Port River to be a highly disturbed system, given the following:</p> <ul style="list-style-type: none"> • The Port River is a shipping channel which is dredged frequently. • ANZG 2018 lists shipping ports as an example of a highly disturbed system. <p>For a highly disturbed system, 80% to 90% species protection Default guideline values (DGVs) are advised by ANZG 2018. However, ANZG 2018 states that if a toxicant has the potential to be bioaccumulative (such as PFAS), the next most protective DGV than the one that would normally be applied based on the agreed ecosystem condition and associated level of protection should be applied (i.e. the 95% species protection DGV for highly disturbed ecosystems instead of the 90% species protection DGV). This level has been adopted for all chemicals (including those which are not bioaccumulative) for ease of communication to the public.</p>
<p>The EPA understands that a Construction Environment Management Plan (CEMP) will be prepared for the site and adhered to during the construction phase. The CEMP should be prepared by a suitably qualified and experienced site contamination consultant in accordance with the EPA Industry Guideline Construction Environmental Management Plan (CEMP), the EPA Guidelines for the assessment and remediation of site contamination (2019), the ASC NEPM, and any other relevant guidelines issued by the EPA. The CEMP is expected to address the range of potential contamination issues likely to be associated with the site, based on the proposed land use.</p>	<p>Response: As discussed in the workshop meeting, the CEMP will be prepared by a suitably qualified professional or will include input from a suitably qualified professional in respect to contamination issues and mitigation measures. The requirement to prepare and implement the CEMP will be a condition of the development approval, and further consultation on the detailed management plans will be undertaken with the EPA before construction commences.</p>
<p>The EIS identifies that the importation of soils will be required to achieve the required site levels for the development, and that any imported soils will be virgin quarry material or WDF suitable for</p>	<p>Response: Thank you for your confirmation. The CEMP will incorporate the necessary measures to ensure compliance with the Standard for the Production and Use of</p>

commercial / industrial land use, and as such, will not increase the contamination risk over the existing baseline conditions, or further contaminate the development site. Any importation of waste derived fill must be undertaken in accordance with the Standard for the production and use of waste derived fill (2013).

Waste Derived Fill (2013). The requirement to prepare and implement the CEMP will be a condition of the development approval, with further consultation on the detailed management plans to be undertaken with the EPA before construction commences.

Nuclear Propulsion Systems

High-level information was provided in the EIS. It is understood that detailed information would be prepared in support of ARPANSA licencing processes; however, without certain elements (detailed further below), the document cannot be considered a comprehensive EIS as the quantum of potential impacts under planned, reasonably foreseeable and low probability scenarios has not been provided.

Response: As discussed in the workshop, a separate meeting will be arranged to discuss the Nuclear Propulsion Systems.

“For comparison, quantitative assessments..... for authorisation under the ARPANS Act.”

Appendix 1.11 Waste management – section 4.3.5 Radioactive waste and section 5 Radioactive waste.

The requirement for licensing under the SA Radiation Protection and Control Act 2021 (RPC Act) would depend on if the contractors are considered ‘controlled persons’ under the ARPANS Act as section 83 of the ARPANS Act states that a state law (i.e. the RPC Act) does not apply to the controlled person.

Response: Thank you for your confirmation. Please feel free to reach out if any further clarification is needed.

Coastal and Marine

A high resolution, validated sediment plume model incorporating the dredge method and plume generation characteristics across the likely dredge period, tidal and weather/climatic cycles is required. It must be developed using at least 12 months of data collected from the dredge site and demonstrate frequency, magnitude and duration of turbidity intersection with sensitive receivers incorporating best available information on thresholds of impact.

Response: As discussed in the workshop meeting, due to the nature of this project as a high-security defence precinct, not all information is publicly available. Additionally, the project design is still in progress, and final design details are not yet available. Consequently, it is not possible at this time to provide the detailed modelling that would typically be submitted to the EPA as part of a dredging licence application.

The assessment of dredge material disposal must consider the use of coffer dams for the ship lift and wet dock to avoid and/or minimise land-based soils included in the material disposed of in the Gulf. Any intended disposal strategy must include a beneficial use assessment that

The qualitative assessment provided in Chapter 20: Coastal and Marine of the EIS, which draws on findings from the Flinders Ports Holdings' dredging activities in 2005 and 2017, was deemed the best available option to assess the likely significance of effects of the dredging of the project.

<p>considers other uses for the material according to the waste management hierarchy.</p> <p>A sediment characterisation assessment is required which adheres to the Commonwealth of Australia’s National Assessment Guidelines for Dredging (2009) and include adequate assessment of potential and actual acid sulphate soils. This assessment needs to have consideration to any site contamination and groundwater contamination identified.</p>	<p>As outlined and agreed with the EPA during the workshop meeting, further assessment and approvals will be undertaken and provided to the EPA as part of the dredging and disposal licence application under the <i>Environment Protection Act 1993</i>. The requirement for the Project to obtain a dredging licence will be a reserved matter in the development approval.</p>
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<p>A CEMP is required that assesses the risks of underwater noise impacts to sensitive receivers. This plan should cover all impact piling and other significant noise generating activities that have the potential to impact the marine environment. Sensitive receivers include resident or transient dolphins and other marine mammals.</p>	<p>Response: A detailed underwater noise assessment for marine fauna was conducted as part of the EIS. Section 5.7 of Appendix 1.2: Noise and Vibration includes an analysis of noise impacts on marine fauna. Additionally, Chapter 12: Marine Flora and Fauna assesses the impact of noise on resident and transient dolphins, as well as other marine mammals, concluding that the effects will be short-term and minor adverse.</p> <p>The CEMPs for the marine works, to be developed either as part of the dredging license or construction works, will outline specific strategies and procedures for managing and mitigating potential impacts on marine flora and fauna throughout the construction phase, ensuring that best practices are followed.</p>
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Surface Water and Groundwater

<p>Sufficient information has been provided at this stage. Future work should include the preparation of a Dewatering Management Plan to the satisfaction of the EPA, as stated in the EIS, and updating the Stormwater Management Plan (Appendix 1.13) to include the information outlined in the EIS and include both stormwater quality (treatment) and quantity (flooding).</p>	<p>Response: Thank you for your confirmation. Please feel free to reach out if any further clarification is needed.</p>
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EPA comment	Proponent/technical subconsultant response
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Nuclear Propulsion Systems

<p>As discussed at the meeting on 12 March, the EPA notes that URPS have advised the Propulsion Systems and storage and disposal of low-level radioactive waste was considered outside the scope of the Strategic Assessment and EIS, as it would be managed via separate environmental assessment processes and</p>	<p>Response: Your confirmation is appreciated.</p>
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<p>approvals as necessary under the applicable legislation. The EPA notes that further assessment and approvals will be required under the ARPANS Act and the Australian Naval Nuclear Power Safety Act 2024, amongst others. These regulatory processes will ensure environmental risks associated with the nuclear propulsion system are properly and robustly addressed.</p>	
<p>Air Quality</p>	
<p>The proposed response addresses the EPA's comments.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>Noise</p>	
<p>The proposed response addresses the EPA's comments.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>Site Contamination</p>	
<p>Noted. The EPA notes the assessment and approval process that will be required under the ARPANS Act.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>The EPA acknowledges the receipt of these addendums to the EIS and understands (based on the information provided) that the results do not materially change the EIS. The EPA understands that the recent assessments have identified potential acid sulfate soils (PASS) in area 3, and contamination of groundwater in the Q2 (as well as Q1) aquifer, which will be subject to dewatering. The EPA understands that a Construction Environment Management Plan (CEMP) will be developed for the various stages of the development and will be prepared in accordance with EPA guidance. These will incorporate an Acid Sulfate Soil Management Plan (ASSMP) and a Dewatering Management Plan (DMP). It is understood that the EPA will be consulted on these plans prior to commencement of construction. The proposed response addresses the EPA's comments.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>The EPA regulates several sites with PFAS contamination in the Port River Estuary area. The EPA has an established regulatory position on this matter since May 2024 and has provided consistent advice to all relevant entities outlining the EPA's expectations, which would also apply to the ANI Nuclear Submarine Yard development. The EPA notes that the Australian & New Zealand Guidelines for fresh & Marine Water</p>	<p>Response: Thank you for your detailed response on this matter. We acknowledge the EPA's position regarding the application of the ANZG (2018) 95% species protection DGVs for non-bioaccumulative contaminants, and the 99% DGVs for bioaccumulative contaminants, including PFAS, in the Port River.</p> <p>At the time of preparing the EIS, the PFAS National Environmental Management Plan</p>

quality (ANZG 2018) state that level of protection applied to an ecosystem is selected to:

- maintain the existing ecosystem condition, or
- enhance a modified ecosystem by targeting the most appropriate level of condition.

The protection level to be applied to the Port River Estuary system is a 'slightly to moderately disturbed ecosystem', and notes that it contains area of high conservation value to the community (including the protected areas identified in 5.3.3 of the EIS). ANZG 2018 states the 'level of protection' can be defined as the degree of protection afforded to a water body based on its ecosystem condition (current or desired health status of an ecosystem relative to the degree of human disturbance). As such it is the EPA's position that the ANZG (2018) 95% species protection Default Guideline Value (DVGs) (i.e. for slightly to moderately disturbed ecosystems) are applicable for non bioaccumulative contaminants in the Port River Estuary system. For bioaccumulative contaminants the PFAS National Environmental Management Plan 3.0 (NEMP 3.0) specifies that the 99% species protection DGV should be used for assessing bioaccumulation in slightly to moderately disturbed ecosystems. As such it is the EPA's position that the 99% DVGs are applied for bioaccumulation contaminants (including PFAS) in the Port River Estuary system. The EPA considers that ease of communication to the public is not sufficient justification to use the 95% DVG for bioaccumulative chemicals where State and National guidance has provided a clear advice. The use of these DVGs will align with the Project Objectives (1.5.5 of the EIS) which include:

- Protect important environmental assets including Mutton Cove and the Adelaide Dolphin Sanctuary.
- Minimises impacts to ecological communities

(NEMP 2.0) was the applicable guidance, which informed the assessment and the proposed mitigation strategies. This was consistent with the Assessment Requirements under HR3, which stipulated that the site and groundwater contamination assessment be carried out in accordance with the PFAS NEMP 2.0. We acknowledge that NEMP 3.0, which was formalized on 4 March 2025, now reflects updated guidance on PFAS levels, including the 99% DVGs for bioaccumulative contaminants.

While the EIS was based on the guidelines in place at the time, we understand the EPA's updated position and will ensure compliance with NEMP 3.0 moving forward. Importantly, we believe that the findings of the EIS, in terms of overall environmental impact, would remain unchanged if the updated guidance were applied retrospectively to the EIS. The key change would be the final mitigation measures for dewatering effluent. Specifically, applying the 99% DVGs would result in more stringent requirements for PFOS treatment, potentially necessitating treatment to levels of $0.00023 \mu\text{g/L}$ prior to disposal into the Port River or the removal of contaminated effluent for disposal at an appropriate facility.

As such, the Proponent believes this matter can be adequately addressed through a condition on the development approval, requiring the development of a Dewatering Management Plan as part of the CEMP. This plan will ensure dewatering activities are undertaken in accordance with NEMP 3.0 and any other relevant guidelines, legislation, or management plans in force at the time of its preparation. Additionally, as the final project design will be established at this stage, updated groundwater monitoring will be conducted at locations where dewatering activities are required, with findings informing appropriate mitigation measures, including disposal methods.

The Proponent will continue to engage with the EPA and other relevant stakeholders to ensure all measures align with the latest

	<p>environmental standards and effectively protect the Port River.</p> <p>The Proponent hopes this approach is agreeable to the EPA as an effective solution to close out this comment.</p>
<p>The proposed response addresses the EPA's comments.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>The proposed response addresses the EPA's comments.</p>	<p>Response: Thank you for your response and confirmation.</p>
<p>Marine</p>	
<p>Noted. The risk of environmental impact from dredging can be significant but manageable depending on the dredge technology implemented and controls put in place. It is recommended to liaise with the EPA in the early planning phases of the proposed dredging and prepare relevant information according to the requirements within the EPA's Dredge Guideline. This includes (but not limited to) the following:</p> <ul style="list-style-type: none"> • At least 12 months of high-quality water quality data including turbidity to establish background conditions. This data should be from at least three sites, one site up and one down current from the proposed dredge location and one within the nearest sensitive receivers (nominally the Zostera seagrass meadows on the Section Bank unless habitat mapping demonstrates closer seagrass. • High resolution hydrodynamic modelling showing sediment plume magnitude and dispersion to predict potential zones of impact using the WA Technical guidance - Environmental Impact Assessment of Marine Dredging Proposals and SA EPA's Dredge Guidelines. Modelling must incorporate accurate estimates of sediment release from the proposed dredge equipment. • For all proposed dredge areas, testing for contaminants according to the National Assessment Guidelines for Dredging. Beneficial use assessment for any proposed disposal of dredge spoil. • Written approval by the Department for Infrastructure and Transport for any proposal to dispose dredge material at the dredge material disposal area offshore Gulf St Vincent. 	<p>Response: Thank you for your detailed response and confirmation that outstanding items can be addressed through appropriate reserved matters and conditions.</p> <p>The Proponent acknowledges the EPA's Dredge Guideline requirements and confirms that early engagement will be undertaken with the EPA once the project design has progressed sufficiently to support the associated dredging licence application.</p> <p>The Proponent also acknowledges the EPA's advice regarding the need to submit evidence of development approval as part of the dredging licence application process. Dredging associated with the construction of Area 3 forms part of the overall development description and was assessed through the EIS. It therefore will fall within the scope of the development approval for the Project.</p> <p>As such, the reference to a reserved matter has been proposed to require the submission of updated and detailed information to support the EPA's dredging licence application, including finalised dredging methodology, modelling outputs, and the Dredge Management Plan (DMP), rather than to withhold development approval for the dredging itself. The Proponent is open to refining the wording of the reserved matter to ensure it clearly relates to the provision of this information, consistent with the EPA's recommendation.</p> <p>The Proponent also acknowledges the EPA's specific technical requirements, including baseline water quality data, high-resolution hydrodynamic modelling, contaminant testing, beneficial reuse assessment, and seasonal timing constraints relating to</p>

<p>Please note that due to the risk of translocating the Pacific Oyster Mortality Syndrome virus which is known to be infected within the Port River, any dredging must be undertaken when the water temperature is below 16 degrees or the temperature required by PIRSA Biosecurity.</p> <p>Please also note that for an EPA dredging licence to be issued, evidence of development approval is required to be provided with a licence application. Given that a reserved matter withholds development approval in relation to that component of the development approval (e.g. dredging), it is not recommended that the requirement for the Project to obtain a dredging licence be a reserved matter in the development approval. A reserved matter could however be utilised in relation to the provision of certain information.</p>	<p>biosecurity risks. These will be addressed through the preparation of the dredging licence application and associated technical studies and DMP in accordance with the EPA's Dredge Guideline and relevant national standards.</p>
<p>Prior to construction commencing, the EPA will need to understand the likelihood of undertaking impact piling (number, location, method, duration, timing etc) within the coastal or marine environment to assess the risk of dolphins within the Adelaide Dolphin Sanctuary. The EPA recommends that it be engaged early in the preparation/review of the CEMP.</p>	<p>Response: Thank you for your response. The Proponent acknowledges the EPA's requirements and confirms that, once detailed design and final construction methods for Area 3 are confirmed, meaningful engagement will be undertaken with the EPA during the development of the CEMPs. This engagement will ensure the EPA has the necessary information to assess potential risks, particularly in relation to impact piling within the coastal and marine environment, and to fulfil its statutory responsibilities.</p>

South Australian Metropolitan Fire Service

SAMFS comment	Proponent/technical subconsultant response
SAMFS Comments on Dangerous Substances (excluding Nuclear)	
<p>The SAMFS is listed throughout the document as a key stakeholder for engagement. We recommend early involvement, particularly with the Built Environs Department, to provide input into the design of dangerous goods and hazardous chemicals storage.</p>	<p>Response: The Proponent acknowledges the important role that SAMFS will have over the life of the NPSCY and recognises the value of early engagement, particularly with the Built Environs Department. As outlined in the EIS, the NPSCY has been informed by an Infrastructure Master Plan for the NPSCY, which serves as the foundation for the final design. While this is not the final design, the Proponent is committed to actively engaging with SAMFS at the appropriate time during the design progression, particularly</p>

	<p>regarding the storage of dangerous goods and hazardous chemicals, to ensure their input is properly considered.</p>
<p>The document outlines a wide range of activities and chemicals. We can provide further comments once quantities are determined. Given the site's complexity, responding to a hazardous materials incident would be highly challenging. Regular engagement with local crews and hazmat staff, along with routine exercises, is strongly advised.</p>	<p>Response: The Proponent acknowledges the complexity of hazardous materials management at the site and the importance of ensuring effective emergency response planning. SAMFS will have further opportunities to provide input once the quantities of chemicals and hazardous materials are determined. As part of the environmental licensing process under the <i>Environmental Protection Act</i> (EP Act), engagement with SAMFS will be required to address environmental conditions and operational requirements for managing dangerous substances.</p> <p>In recognition of the challenges associated with responding to hazardous materials incidents, the Proponent is committed to regular engagement with SAMFS, including local crews and hazmat staff, and will facilitate routine emergency response exercises to ensure preparedness and coordination. This commitment will form part of the Emergency Preparedness Plan which will form part of the Operational Environmental Management Plans (OEMPs) for the proposal.</p>
<p>Under section 4.2.3B, the SAMFS Guideline for an Emergency Services Information Package should be referenced. Compliance with this guideline will help ensure adherence to regulations 43 and 361 of the Work Health and Safety Regulations 2012.</p>	<p>Response: As outlined in the EIS, detailed Emergency Preparedness Plans will be developed for both the construction and operational phases of the NPSCY. These plans will adhere to all relevant legislative safety requirements and guidelines at the time of preparation, including the Guideline for an Emergency Services Information Package. To ensure effective emergency response planning, the Proponent will actively engage with emergency services, including SAMFS, during the development of these plans, ensuring they are tailored to the site's specific risks and operational requirements.</p>
<p>Additionally, the SAMFS should be involved in reviewing emergency plans and Emergency Services Information Packages (ESIP), as outlined on our website.</p>	<p>Response: The Proponent acknowledges the importance of SAMFS's involvement in emergency planning. As Emergency Preparedness Plans are developed post-planning approval, the Proponent will engage with SAMFS to ensure their input is</p>

	<p>incorporated. Additionally, the Proponent will seek SAMFS’s review of the Emergency Services Information Package (ESIP), as outlined in their guidelines, to ensure alignment with emergency response requirements.</p>
<p>The SAMFS provides support to the Control Agency during marine spills involving oil and noxious substances. The SAMFS has specialised equipment suitable for detection of and response to hazardous and noxious substance spills</p>	<p>Response: Thank you for confirming SAMFS’s role in supporting the EPA during marine spills involving oil and noxious substances. The Proponent acknowledges the importance of SAMFS’s specialised equipment and expertise in hazardous and noxious substance detection and response. This information will be incorporated into the Emergency Preparedness Plans, CEMPs, and OEMPs as they are developed post-planning approval. The Proponent will also engage with SAMFS to ensure effective coordination and integration of their capabilities into spill response planning.</p>

South Australian Police

SAPOL comment	Proponent/technical subconsultant response
<p><u>Air Quality</u></p>	
<p>SAPOL note that the current guidance for the current standards for the visit of Nuclear Powered Warships are contained in the Department of Defence – Defence Operations Manual OPSMAN 1. The OPSMAN 1 (currently Version 11 issued 2023) contains requirements for ongoing radiation air quality monitoring at any time that a vessel is in port. These current guidelines have been applied across Australia in response to visits by foreign owned nuclear-powered warships and provide a range of guidance activities for the overall safe management of a Naval Nuclear Reactor within the Australian sea and land zones over a number of years. There is no similar requirement noted in this document for the period of time that a Naval Nuclear Reactor is either within the new facility or within a submarine under construction or during commissioning (either on land or in the sea water undertaking sea testing). OPSMAN 1 has monitoring and planning distances from a vessel (source) that are included in the OPSMAN monitoring criteria. Inclusion of those distances within the Air Quality monitoring boundaries should be included in the plans. SAPOL would</p>	<p>Response: The Department of Defence – Defence Operations Manual OPSMAN 1 (currently Version 11 issued 2023) is not applicable to the NPSCY.</p> <p>The construction and operation of the NPSCY are subject to a range of legislation and approvals from the Commonwealth and State governments.</p> <p>As outlined within Chapter 3: Legislation and Procedural Requirements of the EIS, all matters relating to the Propulsion Systems and storage and disposal of low-level radioactive waste will require assessment and approval under the <i>Australian Radiation Protection and Nuclear Safety Act 1998</i> (ARPANS Act) and <i>Australian Naval Nuclear Power Safety Act 2024</i>, amongst others. Assessment and approval under the ARPANS Act is separate to the State based land use planning approval and falls under Commonwealth jurisdiction and is not subject to State approval.</p> <p>The ARPANS Act applies to the regulation of Commonwealth entities. It prohibits the</p>

<p>seek consideration of radiation air quality monitoring to be included in this assessment.</p>	<p>construction and operation of a radioactive storage or disposal facility unless the Commonwealth entity has been licenced to do so under Section 32 by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).</p> <p>The ARPANSA licensing requirements for the NPSCY necessitate establishing radiological baseline conditions at the development site and maintaining through-life monitoring. This ensures that any deviations from the baseline can be detected and quantified.</p> <p>Due to the comprehensive site evaluation and licensing process, the facility would be subject to ongoing monitoring and periodic review by the nuclear regulator to make sure that the facility adheres to the site safety requirements of the International Atomic Energy Agency. As such, the SAPOL concern raised will be dealt with appropriately under the ARPANS Act and ARPANSA licensing requirements.</p>
<p>While the assessment includes Transport and on-site emissions of a range of listed chemicals, there is no documented consideration of the increased transport of those dangerous goods on the SA Road network. SAPOL would seek consideration of increased air quality monitoring around those consolidated dangerous goods corridors that will arise in site and vessel construction.</p>	<p>Response: The EIS does not warrant a specific air quality assessment for the transport of dangerous goods, as the movement of such goods will be subject to existing statutory requirements and regulations governing their transport. These regulations, which include those related to safety, handling, and transport, are managed and enforced by the relevant authorities to ensure public and environmental safety, including air quality.</p> <p>Furthermore, the transport of dangerous goods is already incorporated within the broader traffic model developed for the NPSCY as part of the Traffic Assessment. This model accounts for the increased movement of all relevant vehicles, including those transporting dangerous goods, and provides a comprehensive view of the overall impact on traffic within the traffic model area.</p>
<p>SAPOL note that there is no air quality monitoring for any on-site, up to low level, radioactive waste storage, further noting that construction activities use radioactive sources in the industrial welding quality control activities.</p>	<p>Response: Please refer to previous response regarding ARPANSA licensing requirements for the NPSCY.</p> <p>Additionally, any contractor involved with the construction of the NPSCY who will use</p>

	<p>non-destructive testing (NDT) to inspect welds and materials for defects would be required to hold the appropriate licence issued by the Environmental Protection Authority in accordance with the <i>Radiation Protection and Control Act 2021</i> (RPC Act).</p>
<p><u>Transport and Traffic</u></p>	
<p>SAPOL notes consideration of shift times and worker dispersal across potential start and finish times and the impact upon traffic and traffic noise. There does not appear to be consideration of alternate routes for approach from the southern suburbs through West Lakes and adjoining areas or alternate routes along Lefevre Peninsula should a vehicle accident restrict the planned approaches.</p>	<p>Response: The traffic assessment and associated traffic model have been developed in close consultation with the Department for Infrastructure and Transport to ensure a comprehensive evaluation of the potential traffic impacts resulting from the NPSCY. The model specifically analyses the impacts on key surrounding routes, including Semaphore Road, Francis Street/Port River Expressway, and Victoria Road. Both the Port River Expressway and Victoria Road are designed to accommodate industrial traffic and are vital freight routes within the regional network, which are expected to absorb the majority of additional traffic movements.</p> <p>In response to the comment regarding alternate routes and the potential impact of vehicle accidents, it is important to note that vehicle accidents are typically short-term events that cause temporary disruptions. Additionally, it should be emphasized that the consideration of vehicle accidents and their impact on alternative routes falls outside the scope of the EIS as the Proponent does not have control over any potential increase in accidents.</p>
<p>SAPOL suggest that changes to motor vehicle propulsion systems over the life of the project may decrease noise risks but increase other risks should accidents occur (such as electric vehicle fires or other vehicle fuel sources).</p>	<p>Response: The Proponent acknowledges SAPOL’s comments regarding potential changes to motor vehicle propulsion systems over the life of the NPSCY. While it is recognized that advances in vehicle technology, such as the shift to electric vehicles or other alternative fuel sources, may lead to reduced traffic noise, as outlined with the EIS, the Proponent does not have control over the vehicle fleet or the potential increase in accidents associated with the use of these vehicles.</p> <p>The Proponent’s responsibility is limited to the assessment of the environmental impacts related to the NPSCY itself. The potential risks associated with changes in</p>

	<p>vehicle propulsion systems, such as electric vehicle fires or other hazards in the event of an accident, fall outside the scope of this EIS and are more appropriately addressed by vehicle manufacturers, safety standards regulators, and emergency services. These factors are not within the Proponent's control and are beyond the environmental impacts typically assessed in an EIS.</p>
<p><u>Coastal and Marine</u></p>	
<p>SAPOL note that the current guidance for the current standards for the visit of Nuclear Powered Warships are contained in the Department of Defence – Defence Operations Manual OPSMAN 1. The OPSMAN 1 (currently Version 11 issued 2023) contains requirements for ongoing radiation water quality monitoring at any time that a vessel is in port. These current guidelines have been applied across Australia in response to visits by foreign owned nuclear-powered warships and provide a range of guidance activities for the overall safe management of a Naval Nuclear Reactor within the Australian sea and land zones over a number of years.</p> <p>There is no similar requirement noted in this document for the period of time that a Naval Nuclear Reactor is either within the new facility or within a submarine under construction or during commissioning (either on land or in the sea water undertaking sea testing). OPSMAN 1 has water quality monitoring requirements adjacent a vessel (source) that are included in the OPSMAN monitoring criteria. Consideration of ongoing water quality criteria for when a vessel is within the water may need to be considered.</p>	<p>Response: Please refer to previous response regarding ARPANSA licensing requirements for the NPSCY.</p>

Native Vegetation Council

NVC Comment:

It is Council's strong preference to see the final design of the proposed development and Native Vegetation Clearance Data Report as part of the EIS provided for comment. The Council feels it doesn't have adequate information to fully comment on the proposal and its potential impact on native vegetation.

Response:

The Proponent acknowledges the NVC's comment regarding the provision of a Native Vegetation Clearance Data Report.

Confirming that the NVC has reviewed the EIS in full, including Chapter 2: Description of the Development (Chapter 2), which outlines that due to the nature of this project as a high-security defence precinct, not all information is publicly available. As for all Impact Assessed developments of this scale, the project design detail is still under development, and a final design is not yet available. Consequently, it is not possible currently to provide the final design of the marine infrastructure within Area 3 (being the component of the development that impacts native vegetation) and a final Native Vegetation Clearance Data Report (NVCDR) as part of the EIS. However, the EIS has included a detailed assessment of potential impacts on native vegetation, based on the best available information at the time of submission.

Additionally, even if the final design of the development were available at this stage, which it is not, preparing a NVCDR now would be premature and ineffective. The construction of marine infrastructure in Area 3, where potential seagrass removal may be required, is not scheduled to occur for several years. During this time, the baseline condition of seagrass in the area will naturally change, with seagrass coverage potentially expanding, contracting, or shifting due to environmental factors.

Given these natural variations, any NVCDR prepared now would become outdated and require reassessment closer to construction, resulting in unnecessary duplication of effort. The most practical and scientifically valid approach is to undertake this assessment once the final design is confirmed, and a final survey of the seagrass area is completed to determine the actual extent of clearance required.

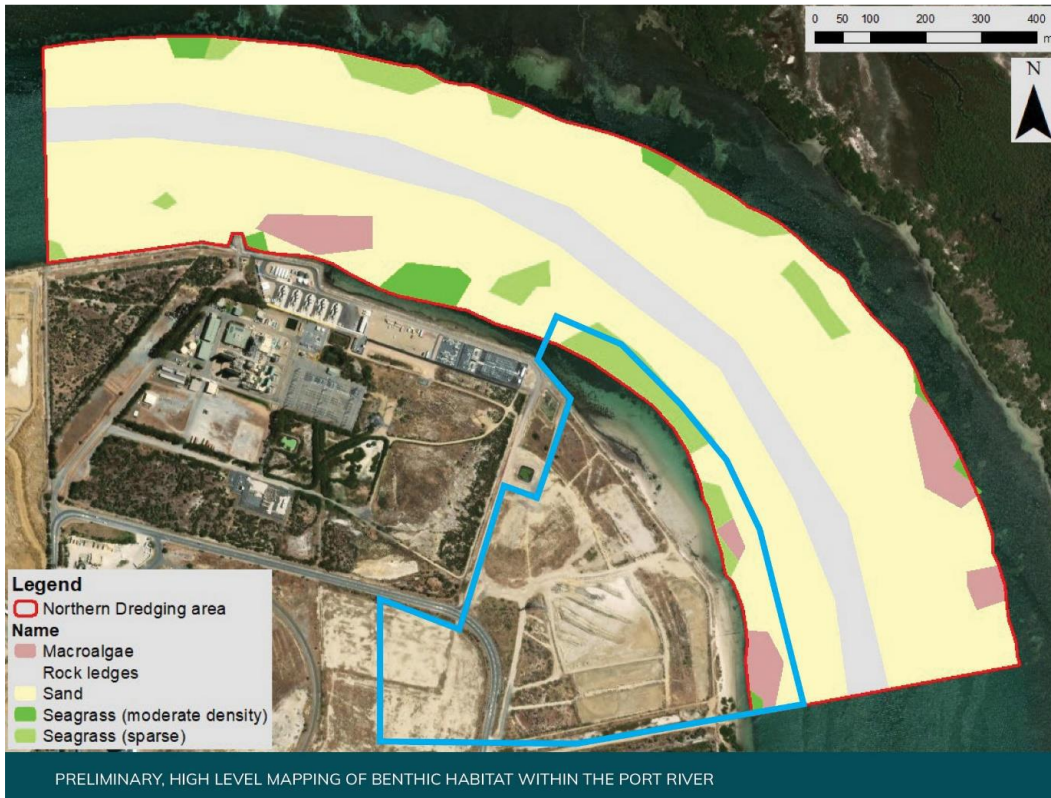
Depending on the final design and the location of seagrass at that time, it is possible that no seagrass removal will be necessary. If this is the case, a Native Vegetation Clearance Permit (NVCP) will not be required.

The EIS correctly confirms that a NVCDR will be prepared by an Accredited Consultant approved by the Native Vegetation Council, in accordance with the *Native Vegetation Act 1991* (NV Act), for any clearance of seagrass or other native vegetation protected under the NV Act, where the NV Act applies. The NVCDR will be undertaken once the final design of the development is confirmed, and the extent of seagrass is known. This requirement will be secured as a condition of the development approval, ensuring compliance with regulatory obligations.

Furthermore, the Proponent believes that adequate information has been provided for the NVC to fully comment on the proposal and its potential impact on native vegetation, as outlined below:

- Chapter 12: Marine Flora and Fauna (Chapter 12) provides a comprehensive assessment of the baseline marine environment within the subject site, covering approximately 12 hectares of the Port River. However, the actual area of the Port River to be affected by construction activities will be significantly smaller, and as such the EIS is a worst case assessment. High-level mapping (Figure 12.2 included below) identifies the primary benthic habitat as sand, with some patches of sparse to moderate density seagrass (i.e., native vegetation), microalgae, and rock ledges. Given the already disturbed nature of the Port River, subject to regular dredging and stormwater inflows, the benthic habitat in the subject site and surrounding area is classified as being a 'Very Low' sensitivity receptor.
- The assessment within Chapter 12 identifies only a few small patches of sparse seagrass (see Figure 12.2) and a very limited area of moderate-density seagrass within the marine-based portion of the development site in Area 3. These may require removal to accommodate the development. Additionally, other seagrass beds and potentially fringing mangroves in the wider Port River could experience indirect impacts due to increased water turbidity. The magnitude of impact from direct seagrass removal, resulting from construction dredging and coastal infrastructure development, is classified as 'High'. However, the magnitude of indirect impacts

on seagrasses and mangroves is assessed as 'Very Low,' given that these effects are temporary, short-term, and reversible.



- The assessment within Chapter 12 concludes that the significance of effects from direct removal of seagrass is classified as a Long-term, Minor Adverse Effect, while indirect effects from increased water turbidity are assessed as Short-term, Negligible Effect.
- Further to the above, the impact to marine fauna has also been assessed within Chapter 12.

As such, the EIS provides sufficient assessment of the potential impacts on native vegetation at this point in time, based on a worse case assessment that native vegetation would need to be removed (i.e. assumes 12 hectares could be removed from the development, however the existing seagrass only covers approximately 3 hectares of the marine area as shown within Figure 12.2.). The information presented aligns with standard environmental impact assessment methodologies and regulatory expectations, ensuring that the NVC can adequately assess and comment on the development. The commitment to preparing a NVCDR at the appropriate stage ensures compliance with relevant legislative requirements, once the final design and area of seagrass to be removed is known.

NVC Comment:

However, based on the available information, the Council provides the following feedback:

- Under Regulation 12 of the Native Vegetation Regulations 2017, impact assessed developments are risk assessed.

Response: No response required.

NVC Comment:

- The proponent must have regard to, and give effect to, the mitigation hierarchy. The impacted area, especially areas of seagrass, samphire and mangrove, has high biodiversity values. The proponent will need to demonstrate what measures it took to firstly avoid, then minimise the impact on native vegetation, before offering to rehabilitate/restore ecosystems, and offset the clearance.

Response:

The Proponent acknowledges the NVC's comment regarding the mitigation hierarchy.

As outlined in the EIS, should native vegetation need to be removed for the development, the Proponent will apply for a NVCP. The NVCDR prepared to support the NVCP would include information that explains how the final design of the development has had regard to the mitigation hierarchy.

It is noted however that the design of the development, as outlined within Chapter 2, shows that the marine infrastructure in Area 3 follows the existing coastline and does not extend significantly into the Port River. The boundary of the development area along the Port River within Area 3 will be hardened, with the affected area primarily located within the intertidal zone. This zone contains limited to no seagrass, which is predominantly located outside the intertidal area. As such, the design minimizes disturbance to native vegetation, given that the patches of sparse to moderate density seagrass area located beyond the intertidal zone.

NVC Comment:

- Data Report, prepared by an accredited consultant, must describe any potential cumulative impact, both direct and indirect, that is reasonably likely to result from a proposed clearance activity. This should include (but is not limited to):
 - o addressing any subsequent impact from the development such as silt/sediment impact on surrounding seagrass habitats and appropriate mitigation measures; this should consider whether clearance of native seagrasses opens an opportunity for the invasive green seaweed (*Caulerpa* spp.) to take over and, if this should happen, whether there is an association between the invasive seaweed and the introduced European Shore Crab
 - o addressing impacts from future dredging of the Port River and navigational channel and basin as well as ongoing maintenance dredging
 - o addressing impacts from other dredging projects approved for the Port River, particularly if undertaken simultaneously.

Response:

Any NVCDR prepared would address potential cumulative impacts as relevant to the development. Any cumulative impact assessment included would typically only consider development with publicly available information sufficient to support a meaningful cumulative assessment. Should information in relation to the capital dredging activities for the channel, which are scoped out of the EIS, not be available or not within the public domain at the time of lodging the NVCP, a detailed cumulative assessment would not be able to be undertaken as part of that NVCP. Instead, the

responsibility for assessing cumulative impacts associated with capital dredging activities and the development will fall upon the development application for the capital dredging activities.

NVC Comment:

- The Council has concerns over and requires further information regarding potential adverse environmental impacts, including:
 - o the impact of increased turbidity on light diffusion, prospectively reducing aquatic plant photosynthesis and disrupting the health of underwater ecosystems
 - o the risk of algal blooms due to increased nutrient loading, which could degrade water quality and compromise marine life
 - o the direct loss of sea meadows from dredging, affecting local biodiversity and disrupting marine habitats
 - o the potential for seagrass degradation, negatively affecting fish nurseries and aquatic food chains with flow on effects for species that rely on these habitats such as the local dolphin population within the Adelaide Dolphin Sanctuary.

Response:

The Proponent acknowledges the NVC's comment regarding potential for adverse environmental impacts.

The EIS, within Chapter 12: Marine Flora and Fauna, Chapter 19: Contamination, Chapter 20: Coastal and Marine and Chapter 21: Surface Water and Groundwater Quality, has addressed these matters. The information provided is sufficient to understand that these impacts can be readily addressed through a range of contemporary design and construction measures.

Impact of increased turbidity:

The EIS assesses the potential for increased turbidity from dredging and construction activities. Given the already disturbed environment of the Port River, and the limited benthic habitat within the subject site and surrounding area, which is not of exceptional quality. The assessment concludes that while turbidity levels may temporarily increase during construction, these impacts are expected to be negligible, short-term and reversible.

Risk of algal blooms:

The EIS assesses the potential for nutrient loading and therefore an increased risk of algal blooms, this is outlined within Chapter 21: Surface Water and Groundwater Quality (Chapter 21). The assessment concludes that the effects of long-term water quality degradation during both the construction and operational phases is considered to be negligible, with mitigation measures such as sediment control and best management practices incorporated into the project design. These measures will be reinforced through appropriate conditions on the approval e.g. the need for Construction Management Plans and Sediment Control Plans.

Direct loss of sea meadows:

The EIS includes an assessment of the direct impacts of the construction of the marine infrastructure for Area 3, including dredging activities, which considers the potential loss of seagrass. The assessment identifies that the area impacted will be minimal, with the direct loss of seagrass being limited to small, sparse areas of lower quantity seagrass. While there is a potential for some loss of habitat, the overall effect on local biodiversity is considered to be minor adverse to negligible, particularly given the limited area affected and the availability of more pristine, unmodified areas of habitat in the wider region.

Potential for seagrass degradation and impacts on marine life:

The potential for seagrass degradation and the impact on marine life, including fish nurseries and species such as the Adelaide Dolphin Sanctuary's (ADS) local dolphin population, has been assessed in the EIS.

The assessment within Chapter 12 concludes that the indirect impacts (such as turbidity) are expected to be low and temporary. The risk to marine life, including fish nurseries, is therefore considered to be short-term and minor adverse during construction and negligible in the long term.

It is also noted that the overall area of the ADS that will be impacted represents just 0.1% of the total area of the ADS. This spatial scope results in the development having no material impact over the wider ADS and in particular the more pristine, unmodified areas. In addition, the portion of the ADS to be used by the development is already a highly modified habitat as it is currently used as South Australia's main shipping port.

The Port River itself has been dredged multiple times and it is fringed by multiple shipbuilding, port and industrial land uses. It has, and is currently, exposed daily to a range of human impacts including marine traffic, noise, light spill and stormwater pollution. Due to historic and current development, stormwater and wastewater are now the primary freshwater inputs to the Port River, and water quality, although better than it has historically been, is still relatively poor as a result.

The EIS demonstrates that all these matters have been thoroughly considered and assessed, with appropriate mitigation measures incorporated into the development to manage and minimise potential impacts. These mitigation measures will be reinforced through conditions and reserve matters for further assessment.

NVC Comment:

- Under section 14(2) of the Native Vegetation Act, the Council, in performing a function, or exercising a power, must not act in a manner that is seriously at variance with the principles of clearance of native vegetation. Under Principle 1(m) of Native Vegetation Act Schedule 1, the Council must ensure that the clearance of vegetation will not cause significant harm to the Adelaide Dolphin Sanctuary. Noting that the portion of the Port River included in the development is included in the Adelaide Dolphin Sanctuary, once the Native Vegetation Clearance Data Report is received, the Council will seek comments from the Minister administering the Adelaide Dolphin Sanctuary Act 2005. The Data Report prepared by an accredited consultant should contain information on this principle where sufficient information or expertise is available.

Response:

The Proponent acknowledges the NVC's comment regarding ADS, and the consideration of native vegetation clearance within its boundaries.

The EIS has addressed these matters, this has been highlighted within the URPS responses above. Chapter 12 of the EIS includes an assessment of the SCY on the ADS and the local population of Indo-Pacific bottlenose dolphins (*Turisops aduncus*).

Appendix E – Technical Reports

- Appendix 1.1: Air Quality Assessment
- Appendix 1.2: Noise and Vibration Assessment
- Appendix 1.3: Traffic Assessment
- Appendix 1.14: Physical Environment - Appendix A Addendum to Site Contamination Assessment.
- Appendix 1.14: Physical Environment - Appendix A Hazardous Ground Gas (HGG) Assessment for Area 1 and Area 2.