



Department of Climate Change, Energy, the Environment and Water

Monday 25th November 2025

To DCCEEW,

RE: EPBC Number 2024/10031: Submarine Rotational Force – West, Priority Infrastructure Work

Thank you for the opportunity to comment on the EPBC referral for proposed works at HMAS Stirling Naval Base on Meeandip (Garden Island) in Western Australia.

This submission is made on behalf of Nuclear Free WA, a registered charity established in 2023. Many of our members live in the local government areas of Rockingham (situated on the border of Whadjuk and Binjareb Noongar peoples' territories), Kwinana, Cockburn and Fremantle which all face Derbal Nara (Cockburn Sound) – the location of HMAS Stirling naval base. Consequently, they are directly and personally impacted by this proposed Bill.

Nuclear Free WA is the latest incarnation of the WA nuclear free movement which began in the 1970's. West Australians have a long standing and proud anti-nuclear history and have resisted against nuclear powered warships, nuclear power, nuclear waste and uranium mining.

Is the proposed development a controlled action?

We are strongly of the view that the proposed actions which seek to facilitate the ongoing presence of nuclear-powered submarines, the generation of nuclear waste and the movement, handling and storage of nuclear waste should be considered a nuclear action under the EPBC Act. Nuclear actions are listed as a Matter of National Environmental Significance and are therefore a controlled action requiring a full whole-of-environment assessment.

We are also concerned about the environmental impacts and potential human health risks associated with the proposed dredging for these works.

The proponent, the Department of Defence, has provided a number of attachments. The comment period for the referral has been insufficient for the public to reasonably review or comment on these documents. There has not been sufficient public consultation about either the details of the proposal, or the full scope of the project, and significant elements of the proposal continually change with little public consultation or engagement. The lack of regard for public consultation shown thus far sets a most regrettable precedent especially for a project of this significance.

A full whole of environment assessment would provide an important mechanism for the proponent to put forward a complete proposal and allow the public to consider and comment on the implications and impacts of the proposed action.

Environmental, cultural and social values in the region

Meeandip and Derbal Nara are part of an important ecological area. The area includes the:

- Listed Critically Endangered community of *Callitris preissii* forests and woodlands of the Swan Coastal Plain
- A genetically distinct population of Little Penguins
- EPBC listed migratory shorebirds
- Priority listed species including the Tammar Wallaby and the Perth Slide
- Threatened Ecological Communities including - Banksia Woodlands, Tuart Woodlands, Thrombolite (microbial community), and Sedgeland in Holocene dune swales - all of the Swan Coastal Plain
- EPBC listed WA seahorse, Indo Pacific bottlenose dolphin, Albatross, Petrel and Marine turtles
- Endangered Australian Sea Lion, Southern Right Whale and Pygmy Blue Whale
- Vulnerable and migratory - Great knot, Grey plover, Ruddy turnstone, and Terek Sandpiper.

The area is host to a great diversity of terrestrial and marine flora, fauna and is in close proximity to the Shoalwater Islands Marine Park. The area is also close to important fisheries and the South-West Marine Region and a Commonwealth Marine area. The area, because of its natural values, is also a critical area for recreation including, boating, fishing, swimming, bush walking, bird watching and more. The area also has significant cultural values for First Nations people. We are not qualified to speak to these issues but urge DCEEW to seek out cultural knowledge holders to better understand the values and risks to their cultural heritage.

We urge DCEEW to require a full assessment of the ecological threats alongside the social and cultural impacts and a full risk assessment from the entire project, including an evaluation of:

- The increase in population and demand on housing and health services, transport and roads.
- Accessibility and security.
- The security risks associated with hosting UK and US nuclear powered submarines in the context of any conflict those foreign nations have with other nations.
- The radiological risks on the environment, workers, community from any accident or any military attack.
- Emergency responses and scenario planning, including the need to evacuate populations or manage radiation exposure.

Nuclear Free WA urges the Minister and DCEEW to not approve the proposal for the Submarine Rotational Force - West. Any further consideration of the proposal should not only require a full whole-of-environment assessment, but a full strategic assessment of the region that considers the additional proposals in the region, including West Port in Kwinana and the Defence Precinct at Henderson. These major developments are likely to have a cumulative impact on the environmental, social and cultural values of Derbal Nara (Cockburn Sound) and the many endangered, priority, vulnerable, migratory species and Threatened Ecological Communities.

The matters raised herein are of extreme significance with long-term, far-reaching risks and consequences. The proposed works at HMAS Stirling Naval Base fully qualify for a full assessment under the EPBC Act.

Sincerely,

KA Garlick and Liam Lilly
Co-Convenors Nuclear Free WA