



Australian Government
Australian Submarine Agency



**SUPPLEMENTARY
STRATEGIC IMPACT
ASSESSMENT REPORT**
SUBMARINE CONSTRUCTION YARD
STRATEGIC ASSESSMENT
OSBORNE, SOUTH AUSTRALIA

18 December 2025





Project name	Submarine Construction Yard Strategic Assessment
Document title	Supplementary Strategic Impact Assessment Report

This document has been prepared by GHD Pty Ltd for the Australian Submarine Agency.

Acknowledgement of Country

The Australian Submarine Agency acknowledges the Kurna Meyunna people of Kurna Country, the Traditional Custodians on whose land the Submarine Construction Yard is sited. We recognise their continuing connection to traditional lands and waters and would like to pay respect to their Elders both past and present.

Acronyms and abbreviations

Acronym / abbreviation	Definition
ANI	Australian Naval Infrastructure
ANNPS Act	<i>Australian Naval Nuclear Power Safety Act 2024</i>
ANNPSR	Australian Naval Nuclear Power Safety Regulator
ANSTO	Australian Nuclear Science Technology Organisation
APRANSA	Australian Radiation Protection and Nuclear Safety Agency
ASA	Australian Submarine Agency
EIS	Environmental Impact Statement
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>
EPR	Emergency preparedness and response
Friends of Port River	Estuary Care Foundation
IAP2	International Association for Public Participation
KYAC	Kaurna Yerta Aboriginal Corporation
LGA	Local Government Area
NERO	Nuclear Emergency Response Organisation
NPT	Treaty on the Non Proliferation of Nuclear Weapons
PAREPG	Port Adelaide Residents Environment Protection Group
Project	Submarine Construction Yard Project
SA	South Australia
SIAR	Strategic Impact Assessment Report
Treaty of Rarotonga	South Pacific Nuclear Free Zone Treaty



Supplementary Strategic Impact Assessment Report

Glossary

Term	Definition
AUKUS	Trilateral security partnership between Australia, the United Kingdom, and the United States of America.
Dredge material placement area	The location in Gulf St Vincent where dredged material will be placed. Located approximately 30 km west of the Strategic Assessment Area in water 30 to 35 m deep. The area includes the route to be taken between dredging within the Strategic Assessment Area and the placement area.
Engagement Implementation Plan	The Engagement Implementation Plan was developed to outline the overall approach and actions to support the required engagement efforts under the Strategic Assessment, and includes: <ul style="list-style-type: none"> – Engagement objectives and principles – Stakeholder identification and analysis – Engagement tools and methods – Proposed engagement activities – Evaluation measures.
Public Comment Period	Once the draft Strategic Impact Assessment Report is completed, it is made available to the public for review and comment. This period is called the Public Comment Period. A Public Comment Period must meet criteria for notification and availability of documents for review, as set out in the Strategic Assessment Agreement (Appendix A), Clause 8.4. The Public Comment Period for the Draft Report commenced on 3 February 2025 and closed on 17 March 2025.
Strategic Assessment	A Strategic Assessment is a discretionary and mutually agreed pathway between the Commonwealth Minister for the Environment and Water and a party to the Agreement. It facilitates approval under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) of actions to be taken in accordance with a policy, plan or program. The function of a Strategic Assessment is to enable the evaluation of the overall impacts of several actions to be undertaken under a policy, plan or program.
Strategic Assessment Agreement	The Strategic Assessment Agreement ('the Agreement') is an agreement as per section 146, Part 10 of the EPBC Act between the Commonwealth Minister for the Environment and Water and a party to undertake a Strategic Assessment which sets out the content required for inclusion within the Strategic Assessment Plan.
Strategic Assessment Plan	Strategic Assessment Plan ('The Plan') is a document which details how construction and operation of the Submarine Construction Yard will occur within the Strategic Assessment Area. Key elements included in The Plan are as follows: <ul style="list-style-type: none"> – Roles and responsibilities, actions and classes of actions for construction and operation of the Submarine Construction Yard, as well as actions that are excluded from the scope of The Plan – Protected Matters to which The Plan relates and provides clear and measurable outcomes and commitments for Protected Matters and for the achievement of administrative and regulatory efficiencies – The processes for executing the Plan, including governance arrangements and an assurance framework.
Strategic Assessment Terms of Reference	The Strategic Assessment Agreement Terms of Reference ('Terms of Reference') is a requirement for the Strategic Assessment that considers the Actions and Classes of Actions of the Plan. It outlines what information must be provided to satisfy that potential impacts to which the Strategic Assessment Agreement relates, are appropriately assessed (in accordance with section 146(f)(i) of the EPBC Act).

Term	Definition
Strategic Impact Assessment Report	<p>The Strategic Impact Assessment Report ('The Report') provides an assessment of the potential impacts associated with the Actions and Classes of Actions of The Plan and address the Terms of Reference of the Strategic Assessment Agreement on relevant Protected Matters, over the 50-year timeframe of the Plan. It provides the information to address the Terms of Reference to support the endorsement and approval of The Plan under the EPBC Act, and includes:</p> <ul style="list-style-type: none"> – A description of the environment to which Actions proposed under The Plan relate – An assessment of the potential impacts of implementing The Plan on Protected Matters – Details of how likely or potential impacts will be avoided, mitigated and offset (where necessary or appropriate) to make sure that Protected Matters are protected and managed in the long-term – A draft of The Report which was published for Public Comment Period.
Supplementary Strategic Impact Assessment Report	<p>This document – the Supplementary Strategic Impact Assessment Report ('Supplementary Report') supports comprehensive understanding, informs decision-making for the final Strategic Impact Assessment Report, and includes:</p> <ul style="list-style-type: none"> – An outline of the outcomes of engagement activities undertaken to support the development of the Strategic Impact Assessment Report and their alignment with the Strategic Assessment Agreement – A summary of engagement activities undertaken during the Public Comment Period for the Draft Strategic Impact Assessment Report ('Draft Report'), held between 3 February 2025 and 17 March 2025 – A detailed analysis and additional insights to support the final Strategic Impact Assessment Report – Incorporation of the feedback collected during the Public Comment Period into the final Strategic Impact Assessment Report, where appropriate.
Submission	<p>A submission refers to a formal, written document where an individual or organisation presents their views, information or evidence regarding a project, within a Public Comment Period.</p>



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1. Introduction

1.1 Purpose of this report

As outlined in the Strategic Assessment Agreement for the Submarine Construction Yard, the purpose of the Supplementary Strategic Impact Assessment Report ('Supplementary Report') is to provide a summary of the public comments received in response to the Draft Strategic Impact Assessment Report (the 'Draft Report') during the Public Comment Period, held between 3 February 2025 and 17 March 2025. The Supplementary Report is also required to outline how comments have been addressed, including where modifications have been made to the Draft Report.

1.2 Engagement activities and objectives

This Supplementary Report provides a summary of engagement activities undertaken prior to and during the Public Comment Period. The outcomes of the engagement activities are outlined in this Supplementary Report and supported by a detailed analysis and insights.

Objectives guide engagement activities and outline the desired outcomes. The following engagement objectives were developed to guide the approach for the Public Comment Period for the Draft Report. Key objectives for engagement for the Australian Submarine Agency's (ASA's) Submarine Construction Yard Project (the 'Project') were to:

- Deliver communication and engagement activities in accordance with the requirements outlined in the Strategic Assessment Agreement
- Establish mutual understanding and agreement with project partners to achieve alignment
- Continue engagement with First Nations stakeholders and community interest groups to ensure that their perspectives are included
- Build community awareness through targeted communication and engagement
- Maintain awareness and understanding of the Project within stakeholder groups and the community
- Encourage community participation through public submissions on the Draft Report
- Maintain established relationships with the community and key stakeholders to promote lasting stakeholder and community trust and goodwill by capturing feedback and addressing concerns.

1.3 Engagement requirements and context

The Strategic Assessment Agreement for the Submarine Construction Yard at Osborne contains requirements for the engagement process for the Draft Report. The engagement activities completed to support the Public Comment Period for the Draft Report—and community engagement completed for the Project to date—have been delivered in alignment with the requirements listed within the Strategic Assessment Agreement.

Engagement activities were also designed with consideration of the following guidelines:

- *Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth of Australia 2023)
- *A Guide to undertaking Strategic Assessments* (Commonwealth of Australia 2013a).

Extracts from the Strategic Assessment Agreement that relate to the ASA engagement obligations are referenced in Appendix A. Engagement activities undertaken prior to the Public Comment Period and in alignment with these requirements are outlined in Section 2.

2. Approach to Project engagement

Project engagement was structured to align with key milestones of the Strategic Assessment process. This enabled a structured approach and detail on the necessary activities required at each stage. This section details the engagement activities that have been implemented according to the phases shown in Figure 1.

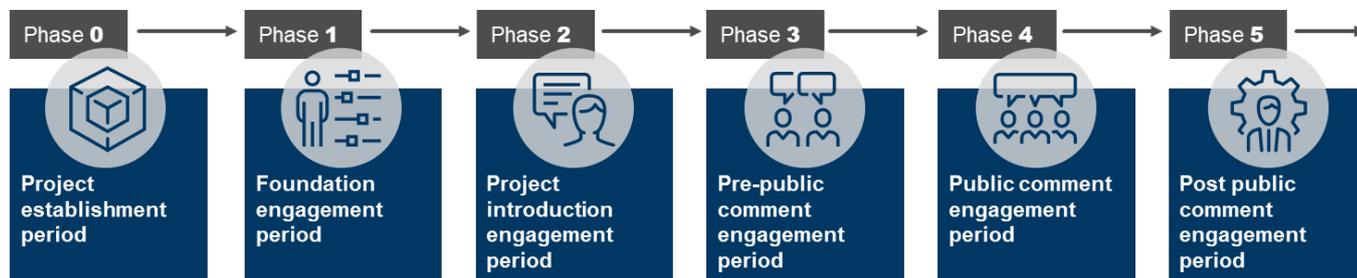


Figure 1 Phases of engagement for the Strategic Assessment

The approach to engagement for the Strategic Assessment by the ASA is aligned with the statutory requirements outlined in the Strategic Assessment Agreement, and took guidance from the International Association for Public Participation (IAP2) and the principles of the South Australian “Better Together” engagement framework (DPC 2024).

The approach to engagement highlighted the importance of the following elements, all of which were addressed as part of the engagement activities and aligned with the Strategic Assessment Agreement. These included:

- Building and maintaining relationships with First Nations stakeholder groups;
- Recognising the importance of building social licence, and community trust in addition to the statutory Project setting;
- Adopting a comprehensive approach to data capture and management for accuracy of reporting and recording feedback; and
- Centralising the State and Commonwealth public engagement periods (Phase 4).

2.1 Summary of engagement activities – pre–Public Comment Period

The ASA undertook community engagement activities throughout the development of the Draft Report. This section provides an overview of activities undertaken at each phase leading up to the Public Comment Period (Table 1). For more details on the outcomes of engagement activities during these phases, refer to Appendix F of the Draft Report.

Table 1 Summary of engagement activities completed prior to the Public Comment Period

Date	Engagement activities	Details
Phase 0: Project establishment period		
4 December 2023 – 28 January 2024	Terms of Reference – Public Comment Period	The draft Terms of Reference for the Submarine Construction Yard were open for public comment from 4 December 2023 to 28 January 2024. Public notifications were made through the Adelaide Advertiser and the ASA webpage. The ASA received one submission to the Terms of Reference during this Public Comment Period.

Date	Engagement activities	Details
3 December 2023	Targeted initial engagement	<p>Targeted initial engagement with key stakeholders. These included:</p> <ul style="list-style-type: none"> – City of Port Adelaide Enfield Council – Australian Naval Infrastructure – Port Adelaide Residents Environment Protection Group (PAREPG) – Estuary Care Foundation (Friends of Port River) – South Australian Government. <p>The Project team held proactive discussions and regular scheduled meetings to provide stakeholders with information about the Project, while introducing them to their point of contact from the ASA.</p>
Phase 1: Foundation engagement period		
February 2024 – to date	'Social Listening' reports delivered fortnightly	Social listening tool, <i>GHDPulse</i> was established to understand stakeholder and community sentiment and track key issues that relate to the Project.
26 February 2024 – 29 February 2024	Introductory meetings with First Nations stakeholders	Meetings with four First Nations stakeholder groups held to introduce the engagement team, the Project team at a high level and to gain an understanding of the role stakeholders play in the Adelaide community. These meetings enabled stakeholders to build an understanding and set expectations, learn about the ASA and its organisational aspirations, as well as protocols regarding ongoing Project engagement.
Phase 2: Project introduction engagement period		
1 April 2024	Community Update letterbox drop	Distributed a 2-page A4 'Community Update' to 65,000 addresses across the Port Adelaide Enfield local government area (LGA). The Community Update provided a general overview of the Submarine Construction Yard, the Strategic Assessment process and timeline as well as answers to some common questions about the Project. It introduced the first Community Webinar session and provided details on how to register.
17 April 2024	Community Webinar	<p>The Project team delivered a 30-minute Community Webinar, designed to provide a brief explanation of the Submarine Construction Yard.</p> <p>A total of 131 registrations were received for the community update session, with 64 attendees on the day. Following the session, a recording was uploaded to the ASA webpage to provide additional access to the information presented.</p> <p>ASA received five emails following the webinar, requesting further information on traffic impacts (one), and procurement opportunities (four).</p>
Throughout Phase 2	Targeted Stakeholder Engagement	<p>Targeted engagement with key stakeholders. These included:</p> <ul style="list-style-type: none"> – City of Port Adelaide Enfield Council – Australian Naval Infrastructure – PAREPG – Estuary Care Foundation (Friends of Port River) – South Australian Government. <p>The Project team held proactive discussions and regular scheduled meetings to provide stakeholders with information about the Project, while introducing them to their point of contact from the ASA.</p>
October 2023 – June 2024	Other social licence activities being delivered by the ASA	<p>The ASA Social Licence team also undertook a few community engagement activities as part of the wider community engagement program, which included:</p> <ul style="list-style-type: none"> – Navy and Shipbuilding Career Expo November 2023 – Kiosk events.
Phase 3: Pre-public comment engagement period		
21 June 2024	Targeted Stakeholder Engagement	<p>Targeted engagement with key stakeholders. These included:</p> <ul style="list-style-type: none"> – City of Port Adelaide Enfield Council – South Australian Government. <p>The Project team provided an update on the Strategic Assessment process and provide a briefing of the upcoming engagement activities.</p>



Date	Engagement activities	Details
22 June 2024	Community drop-in information session	<p>The ASA hosted an in-person drop-in information session at the Port Adelaide Library to communicate details shared in the webinar; and provide the community with an opportunity to raise questions in-person about the Submarine Construction Yard, potential impacts, or other Project-related enquiries.</p> <p>The session was promoted via newspaper advertisement, in the Adelaide Advertiser. It was also promoted via the ASA webpage and social media channels. Invitations were also sent out via email to existing stakeholders.</p> <p>Twenty-three attendees registered for the community drop-in information session, with a total of 40 attendees on the day. Attendees included 34 residents, as well as representatives from three local business, two community / environment groups, and one government agency (Port Adelaide Enfield Council).</p>
5 August 2024	Site walk and Project briefing with Kaurna Yerta Aboriginal Corporation (KYAC) Board	<p>A project briefing and site walk was held with KYAC Board representatives, and provided:</p> <ul style="list-style-type: none"> – KYAC Board members with the opportunity to meet the Project team – Detailed Project overview (i.e., background, process, timeline, progress, next steps) – Answers to questions about the Project – Uphold the principle of free, prior and informed consent.
8 October 2024	Meeting with KYAC Board	<p>Meeting with the KYAC Board to provide an overview of the Draft Report, the upcoming Public Comment Period and how to make a submission.</p>



3. Public Comment Period for the Draft Report

The outcomes from the pre-Public Comment Period engagement activities (as outlined in Section 2.1), informed the development of the Draft Report and facilitated the establishment of relationships with stakeholders. These engagement activities provided a solid foundation to launch the subsequent Public Comment Period for the Draft Report. The following sections outline the engagement approach, objective, and activities undertaken during the Public Comment Period.

3.1 Public Comment Period engagement objective

In planning the engagement activities for the Public Comment Period for the Draft Report, the Project team adopted the following engagement objective to guide the approach.

Objective: Encourage community participation to inform The Report through regular communication and engagement.

Steps taken to achieve this objective:

- Kept stakeholders informed of how their feedback would be considered in The Report by developing communication collateral
- Increased presence in local communities to provide key stakeholders / the community with the opportunity to participate and be heard
- Ensured timely and transparent engagement on the Strategic Assessment to build and maintain relationships and trust with key stakeholders
- Targeted communication and engagement with key stakeholders to build an understanding of The Report and encourage early engagement with the process
- Documented stakeholder interactions relating to the Strategic Assessment to demonstrate extensive community engagement throughout the development of The Report
- Encouraged community members and stakeholders to make submissions about the Project.

3.2 Interagency engagement approach

A collaborative interagency engagement approach was developed to inform stakeholders about similar concurrent projects by streamlining the engagement process for several projects in the area. The ASA exhibited The Report to the public at the same time the Australian Naval Infrastructure Pty Ltd (ANI) exhibited its Draft Environmental Impact Statement (EIS), and the Department of Premier and Cabinet undertook engagement to inform the development of a Masterplan for the Lefevre Peninsula.

Recognising the likely overlap and the shared stakeholder groups between these projects, the ASA led an interagency Public Comment Period in collaboration with ANI and the Department of Premier and Cabinet, meeting the requirements set out in the Strategic Assessment Agreement for the Project (Appendix A). This integrated approach enabled each agency to address relevant enquiries about their respective projects directly, simplifying the engagement process and reducing the demand on the community in navigating separate engagement activities and project interrelations.

3.3 Engagement activities

3.3.1 Public Comment Period

The Public Comment Period enabled stakeholders and the community to review and comment on the Draft Report. The Public Comment Period kicked off on 3 February 2025, following endorsement of the Draft Report by the Department of Climate Change, Energy, the Environment and Water.

Clause 8.4 of the Strategic Assessment Agreement (Appendix A), outlined the criteria for notification and availability of documents during the Public Comment Period. This included:

- a. Notifications posted on the ASA website for a minimum period of public consultation of at least 28 days
- b. Notifications published in a national daily newspaper on the first day of the Public Comment Period
- c. Invitations for comment on the Draft Report, for the period of public consultation
- d. Notification mentions:
 - i. The Draft Report is available for public comment
 - ii. The dates for the Public Comment Period
 - iii. That public comment is invited in accordance with section 146(2)(b) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
 - iv. Where and how copies of the Draft Report may be obtained in electronic and hard copy formats
 - v. Contact details for further information
 - vi. Address to which public comments should be provided.

The following sections outline the activities undertaken during the Public Comment Period.

Notifications

To launch the Public Comment Period, the ASA undertook the following notification activities in accordance with the guidelines outlined in Clause 8.4 of the Strategic Assessment (Appendix A):

- Updates to the ASA webpage
- Publishing a public notice in the Adelaide Advertiser.

To expand the reach of the public notification, and notify stakeholders who had expressed interest in the Project through involvement in previous engagement activities, the ASA also completed additional notification activities, as outlined in Figure 2.

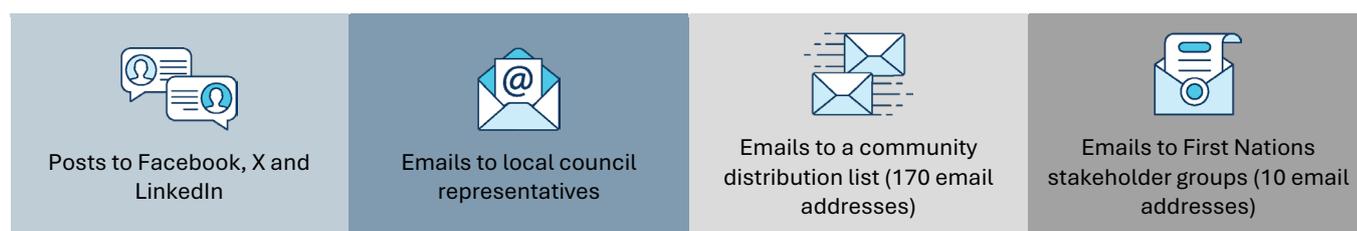


Figure 2 Additional notification activities

Evidence of Public Comment Period notifications for each channel is provided in Appendix B. This listed correspondence notified readers of the following:

- The Draft Report was available for public comment
- The period for public comment (35 days between 3 February 2025 and 17 March 2025)
- The provision of the EPBC Act that requires the Draft Report to be published (i.e., section 146(2)(b))
- Where and how copies may be obtained in electronic and hard copy formats without charge or at a reasonable cost
- Contact details for obtaining further information, including reasonable access for persons with special needs
- The webpage address to obtain digital copies of the Draft Report and details of how to make a submission.

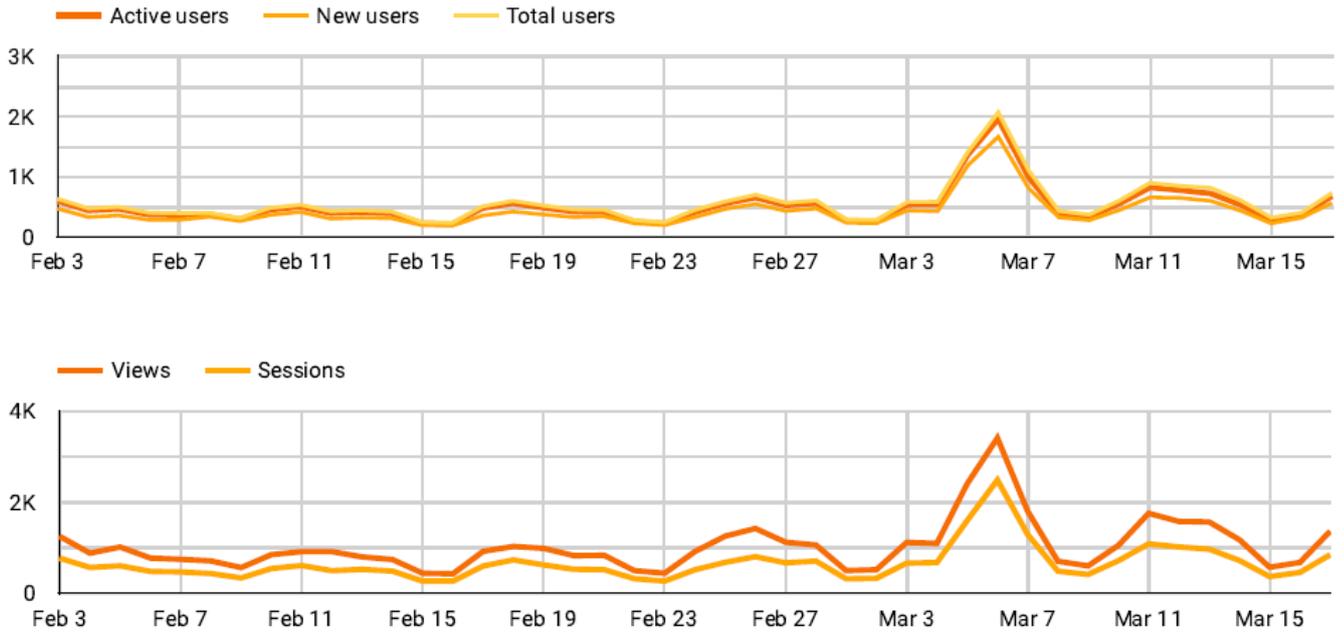


Figure 3 ASA webpage traffic data showing a breakdown of user types and the differences between 'views' and 'sessions'

Key ASA webpage metrics are highlighted in Figure 4. Overall, the webpage analytics indicated consistent interest around the Submarine Construction Yard Strategic Assessment and the Draft Report. Webpage metrics also indicate that the spike around March 5 can be attributed to announcements regarding the Skills and Training Academy Campus. Refer to Appendix C for the detailed webpage analytics report.



During the Public Comment Period

(3 February 2025 to 17 March 2025)



419

The Draft Report was downloaded 419 times



373

The Project Overview factsheet was downloaded 373 times



217

The Overview booklet was downloaded 217 times



3,515

The Osborne Submarine Construction Yard Project webpage was viewed 3,515 times

Figure 4 ASA webpage metrics

3.3.3 Targeted stakeholder briefings

Targeted stakeholder briefings are focused communication sessions designed to share information and gather feedback from specific stakeholder groups who have an interest in or are affected by the Project.

During the Public Comment Period, the ASA maintained and established new relationships via targeted briefings with stakeholders who had an interest in the Project.

These sessions were attended by representatives from the ASA and ANI, to provide continuity and demonstrate the interagency approach to the Public Comment Period. An overview of activities from these sessions are summarised in Table 3 below.



Table 3 Stakeholder briefings

Stakeholder group	Date	Discussion topics
KYAC	7 January 2025	<ul style="list-style-type: none"> – Updates on the Strategic Assessment process – Opportunities for ongoing engagement on the Project and the best mechanisms to seek feedback.
City of Port Adelaide Enfield Council	18 February 2025	<ul style="list-style-type: none"> – Differences between the State and Commonwealth government approval processes for the Project – Climate change mitigations and adaptations – Improvements to the northern and western boundaries of Mutton Cove.
Interested stakeholder groups including: <ul style="list-style-type: none"> – PAREPG – Friends of Port River – Estuary Care. 	18 February 2025	<ul style="list-style-type: none"> – Differences between the State and Commonwealth government approval processes for the Project – Expressed interest in being involved in ongoing engagement for the Project and to help 'problem solve' rather than be told of the outcome after the fact – Understanding future approvals and their timing in reports and communication moving forward where feasible.
City of Salisbury Council	13 March 2025	<ul style="list-style-type: none"> – Requested further briefing on the Skills and Training Academy and STEM / Workforce / Education plans – Employment opportunities within the City of Salisbury LGA – Additional engagement activities and support required for further phases of the Project.

Meetings were also attended by representatives from ANI, who were undertaking engagement to inform their EIS concurrently to the ASA Public Comment Period. Discussion items that relate to the ANI EIS have not been included in the summary above.

3.3.4 Drop-in information sessions



Four community engagement drop-in sessions were held across Adelaide, in the Adelaide CBD, Port Adelaide, and Osborne. These sessions aimed to increase public understanding and awareness, as well as gather public comments and feedback about the Draft Report. These activities took place between 19 February 2025 and 22 February 2025.



As outlined in Section 3.2, these sessions were held in partnership with ANI and the South Australian Department of Premier and Cabinet. The sessions were promoted via a newspaper advertisement on 3 February 2025, and on the ASA's social media accounts and webpage. An email invitation was also distributed to existing stakeholders on 3 February 2025. ANI advertised the jointly-attended information session through flyer distribution to households in the immediate Lefevre Peninsula area.

Session registration

Interested attendees were encouraged to register their interest in attending via an online booking platform (TryBooking). While registration was not mandatory, it provided some visibility about the level of interest and collected some general information about the attendees.

A total of 48 registrations were received across the four sessions. As part of the registration process, respondents were asked to identify which interest category they belonged to. As shown in Figure 5, of these registrations, 40 percent were not from the immediate Port Adelaide area, compared with 25 percent identifying as residents and 19 percent representing various community groups or organisations.

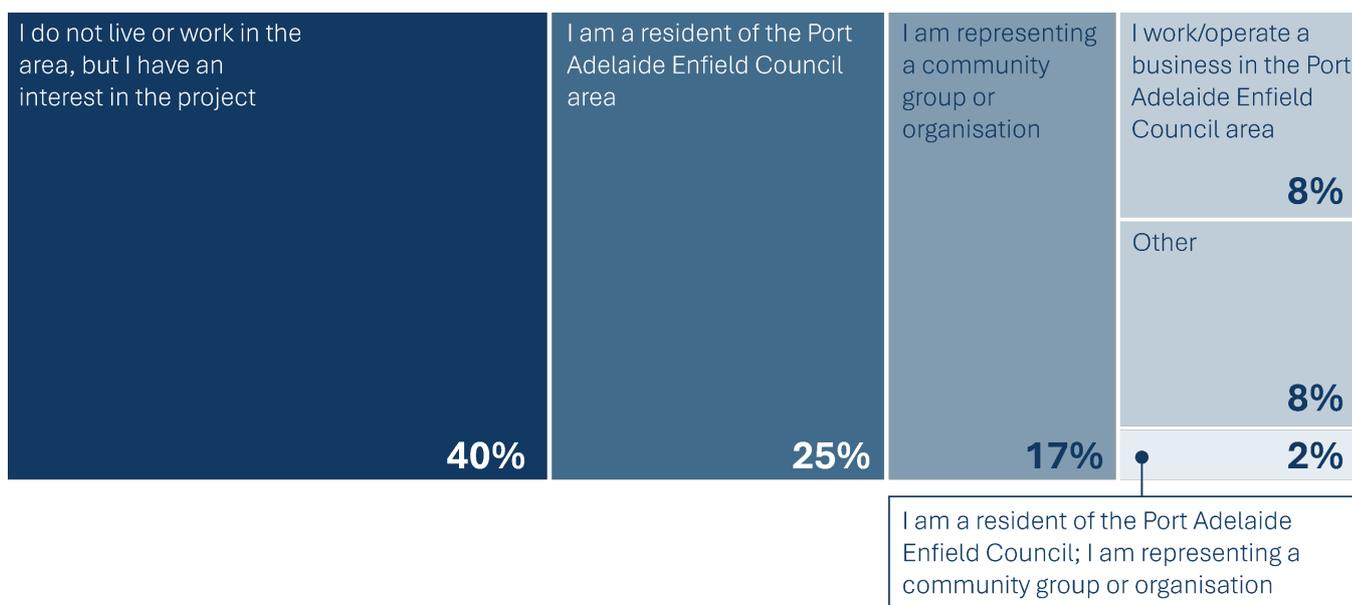


Figure 5 Breakdown of registrations by interest category

Session attendance

Over the four community information drop-in sessions, 158 people attended the sessions. A breakdown of attendees is provided in Table 4.

Table 4 Information session attendees

Session	Date	Time	Location	Number of attendees
Session 1	19 February 2025	11:30 am – 1:30 pm	State Library of South Australia, North Terrace, Adelaide, SA, 5000	33
Session 2	20 February 2025	5:00 pm – 7:00 pm	Port Adelaide Plaza Shopping Centre, 200–220 Commercial Road, Port Adelaide, SA 5015	47
Session 3	21 February 2025	1:00 pm – 3:00 pm	Lefevre Community Stadium, 541 Victoria Road, Osborne, SA 5014	30
Session 4	22 February 2025	1:00 pm – 3:00 pm	Lefevre Community Stadium, 541 Victoria Road, Osborne, SA 5014	48

Session delivery and flow

A series of community information drop-in sessions were held to provide the community with an opportunity to learn about the Project and ask questions of the Project team.

To assist attendees in navigating the sessions, the ASA staff provided support by explaining the layout of the session, and what each agency was exhibiting for engagement. Staff then assisted attendees with introducing them to the relevant team members and directing them to the relevant information.

The sessions included printouts of all collateral items listed in Section 3.3.2, and A1 poster boards that could be used to guide discussions. Session collateral items are outlined in Appendix B-3.

During the sessions, attendees were encouraged to speak with staff about their questions and concerns in relation to the Project. The ASA had at least six staff members available at the session at any time to speak to attendees for as long as they needed. Factsheets, posters, maps and hard copies of the Draft Report were used to guide discussions.

Capturing feedback during the sessions

Staff who attended the session and engaged with attendees captured notes that summarised their interactions, as outlined in Table 5 below.

Table 5 Discussion themes from community drop-in information sessions

Key themes	Details
Theme 1: Nuclear safety / waste	<p>A number of participants voiced concerns about the perception that radioactive waste might be accepted from AUKUS partners.</p> <p>Others questioned how and where the low-level radioactive waste generated within the Submarine Construction Yard will be stored, and asked for clarification on what is meant by 'safe' levels in relation to radiological material.</p> <p>Concerns were raised about the exclusion of the <i>Australian Naval Nuclear Power Safety Act 2024</i> (ANNPS Act) and Nuclear Safety Assessment in the Strategic Assessment.</p> <p>Additionally, there were concerns about the proximity of radiological activities to populated areas and perceived health and safety risks.</p> <p>The transport of the nuclear reactor to the Submarine Construction Yard in Port Adelaide, a declared no nuclear zone, was also a topic of concern.</p>
Theme 2: Environmental impacts	<p>Concerns included the effects of dredging on the local ecosystem, the impact on mangroves, and water supply on the peninsula.</p> <p>Concerns were raised regarding the issues of noise, dust and air quality from the construction and operation.</p> <p>Stakeholders also flagged concerns about the potential impact on the Dolphin Sanctuary, Biodiversity Park, Falie Reserve and Mutton Cove.</p> <p>Additionally, there were concerns about king tide movements affecting the Port Adelaide River system.</p>
Theme 3: AUKUS / National Security	<p>There were comments about the level of United States (US) engagement and the perceived threats posed by the AUKUS agreement.</p> <p>Concerns were expressed about the economic and political motives behind the initiative and the potential loss of national sovereignty.</p> <p>Some community members were generally opposed to AUKUS, fearing that Osborne could become a military target, and that Australia could be further drawn into international conflicts.</p>
Theme 4: Consultation concerns	<p>Sentiment that plans were rushed through without adequate public engagement.</p> <p>There was a perception of 'piecemeal' engagement and a lack of thorough public dialogue.</p> <p>Some members of the community described the engagement process as disappointing and tokenistic, especially concerning the commitments made by State representatives.</p> <p>Concerns were also expressed about a perceived lack of engagement with local councillors.</p>
Theme 5: More Project details	<p>The community sought more information about the general approvals process for the Project, including further transparency and clarity on how decisions are being made.</p> <p>Specifically, there were enquiries about the interface between the Submarine Construction Yard and understanding the new layout of the Collins-Class yard.</p>
Theme 6: Traffic / access issues	<p>There was a general concern for the safety of traffic movements due to the absence of signalised crossings.</p> <p>Comments were made about the Submarine Construction Yard creating additional traffic in an already congested area, with specific mentions of Victoria Road.</p>
Theme 7: Jobs / employment	<p>Comments were made about estimated job opportunities and how they have been calculated.</p> <p>There was a positive outlook on the potential for new jobs and the growth of the industry, with some individuals expressing a direct interest in gaining employment through the Project.</p>

4. Submissions

A submission refers to a formal, written document where an individual or organisation presents their views, information or evidence regarding a project, during a Public Comment Period.

The ASA and ANI Project teams were simultaneously collecting public submissions to their respective draft reports. Recognising the interconnected nature of the approval processes, both organisations agreed to share the submissions they received to ensure there was comprehensive consideration of all relevant comments.

Section 4.1 provides a summary of public feedback on the Draft Report, including modifications made in response to these comments. Section 4.20 summarises feedback related to the Draft EIS received by ANI.

A total of 41 submissions were received on the Draft Report including:

- One handwritten submission
- 19 webform submissions
- 21 emailed submissions.

4.1 ASA submissions analysis

Once submissions were received, they were analysed in order to understand the key themes and how they related to the Strategic Assessment requirements.

The tables below outline the analysis undertaken for submissions on the Draft Report provided directly to the ASA. They also highlight the issue category (which is based on key headings in the Draft Report), a summary of the comments received in relation to that issue category, the unique identifiers of the submissions from which the comments originated, the ASA's response to the comments, and a reference to where the comment is addressed in The Report.

4.1.1 Submissions analysis approach

Following the closure of the Public Comment Period on 17 March 2025, the ASA collated submissions and analysed these against a series of themes and subthemes, which align with key headings in the Draft Report.

The following sections provide an analysis of the submissions by theme and subtheme. Each subtheme is presented in individual tables summarising:

- The comments received for the subtheme
- The number of submissions that made a comment relating to the subtheme
- The ASA's response to those comments
- A reference to where the comment has resulted in an amendment to The Report.

Figure 6 outlines an overview of the submission analysis process. Table 6 summarises the number of submissions coded to each theme and subtheme.

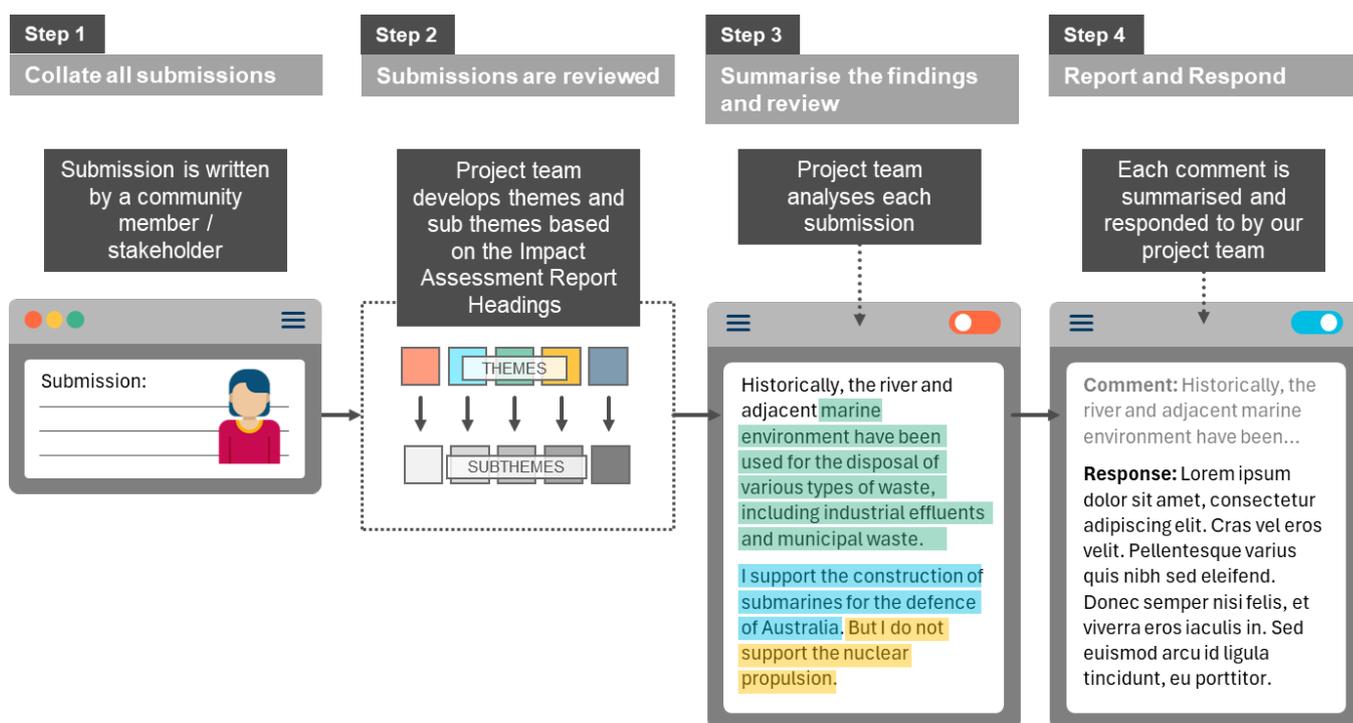


Figure 6 ASA submissions analysis process overview

Table 6 Number of submissions summarised by theme and subtheme

Theme	Subtheme	Number of submissions
Matters of national environmental significance	Listed threatened species and ecological communities	2
	Migratory species	4
Theme subtotal		6
The environment	People and communities	10
	Animals	8
	Coastal landscapes and processes	7
	Ocean forms, ocean processes and ocean life	7
	Water resources	7
	Plants	6
	Pollutants	4
	Landscapes and soils	3
	Natural heritage	2
	Historic heritage	2
Indigenous heritage	1	
Theme subtotal		57
Sections of the Draft Report	Mitigation measures	4
	Legislative context	2
	Risk assessment	1
	Outcomes and commitments	1
Theme subtotal		8



Theme	Subtheme	Number of submissions
Agreed excluded actions	Commissioning of the power module	22
	Waste facility	17
	Long-term disposal of radioactive waste	12
	Manufacture and delivery of the reactor power module	4
	Skills and training academy campus	1
	Decommissioning of the Submarine Construction Yard	0
	Development associated with existing shipyard buildings	0
	Existing operations and services	0
	Maintenance dredging	0
	SSN-AUKUS Operation	0
	Sustainment of the SSN-AUKUS	0
Theme subtotal		56
Other	Consultation	16
	Future assessment	14
	Australia's National Defence Strategy	12
	Defence spending	12
	Military threat	11
	Jobs / employment	3
	Existing / future infrastructure	1
	Local and/or State economy	0
	Funding considerations	0
	Business impacts	0
Theme subtotal		69

4.1.2 Matters of national environmental significance

Under the EPBC Act, 'matters of national environmental significance' are specific elements of the environment that are protected due to their national importance. The Draft Report includes an assessment of the likely potential impacts of the Submarine Construction Yard on matters of national environmental significance.

This section outlines the comments in submissions received by the ASA that relate to 'matters of national environmental significance'.

Subthemes

Table 7 outlines the two subthemes that the submissions were analysed against regarding comments relating to matters of national environmental significance.

Table 7 Subtheme definitions – matters of national environmental significance

Subtheme	Definition	Table reference	Number of submissions
Listed threatened species and ecological communities	<ul style="list-style-type: none"> – Comments relating to Commonwealth EPBC Act listed species – Comments relating to Commonwealth EPBC Act listed threatened ecological communities. 	Table 8	2

Subtheme	Definition	Table reference	Number of submissions
Migratory species	<ul style="list-style-type: none"> – Comments relating to migratory species including birds and turtles – Comments relating to migratory bird habitat including the Adelaide International Bird Sanctuary – Comments relating to impacts to migratory bird habitat due to climate change – Comments relating to impacts to other migratory species habitat. 	Table 9	4

Submission analysis – matters of national environmental significance

Table 8 Comments received – listed threatened species and ecological communities

Theme	Summary	Number of submissions
Listed threatened species and ecological communities	<ul style="list-style-type: none"> – Comment raised about potential impacts to the local Australian sealion population from Actions or Classes of Actions – Comment raised about potential impacts to feeding and roosting activities of threatened bird species in the vicinity of the Submarine Construction Yard due to noise. 	2

Response to comments

The ASA is aware that the region surrounding the Strategic Assessment Area provides habitat for a number of listed threatened species, including the Australian sealion and threatened bird species.

Potential impacts

Indirect and direct impacts to listed threatened species have the potential to occur in relation to Actions associated with the Construction of the Submarine Construction Yard Class of Action.

Disturbance associated with the Submarine Construction Yard is limited to undertaking works within the Strategic Assessment Area, and the movement of vessels containing dredged material for disposal in Gulf St Vincent, and does not include direct impacts to threatened species habitats on Mutton Cove or Torrens Island.

The Report has included detailed assessment of EPBC Act listed threatened species and potential impacts to the environment more broadly. Details of these assessments are included in The Report and other supporting reports. These set out the comprehensive process the ASA has undertaken to identify species likely to be present within the Strategic Assessment Area and surrounds, based on targeted field surveys and existing scientific assessments of the area, including information available from the Department of Climate Change, Energy, the Environment and Water.

The ASA acknowledges the potential impacts that activities associated with the construction and operation of the Submarine Construction Yard may have on the environment.

The Report has been updated to include clearer identification and description of the assessment, including potential impacts to the roosting and foraging of the Australian fairy tern and eastern hooded plover as a result of dredging activities. With the mitigations outlined in The Report in place, impacts to these species are not expected to be significant.

Controls to limit potential impacts

Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard including scheduling dredging activities to minimise encroachment into the breeding and nesting season of the Australian fairy tern and eastern hooded plover.

Changes to Draft Report

- Additional description of dredging activities has been incorporated into The Report
- Specific descriptions of mitigations to be implemented to manage potential impacts have also been added.

Table 9 Comments received – listed migratory species

Theme	Summary	Number of submissions
Listed migratory species	<ul style="list-style-type: none"> – Comment about potential impacts to feeding and roosting activities of migratory bird species in the vicinity of the Submarine Construction Yard due to noise – Comment that the risk rating for migratory species in Appendix H of the Draft Report could be revised to be higher – Comment requesting that beyond best practice measures be applied for the management of migratory species. 	4
Response to comments		
<p>The ASA is aware that the region surrounding the Strategic Assessment Area, including Gulf St Vincent, provides habitat for a number of migratory bird species.</p> <p><u>Potential impacts</u></p> <p>Indirect and direct impacts to listed migratory species have the potential to occur in relation to Actions associated with the Construction of the Submarine Construction Yard Class of Action.</p> <p>Disturbance associated with the Submarine Construction Yard is limited to undertaking works within the Strategic Assessment Area, and the movement of vessels containing dredged material for disposal to Gulf St Vincent. Potential impacts to southern right whales migrating through Gulf St Vincent during dredging activities have been identified.</p> <p>Indirect impacts to migratory bird species which use Bird Island and Mutton Cove due to noise, are not likely to significantly impact on these species.</p> <p>The Report has included detailed assessment of EPBC Act listed migratory species and potential impacts to the environment more broadly. Details of these assessments are included in The Report and other supporting reports. These set out the comprehensive process the ASA has undertaken to identify species likely to be present within the Strategic Assessment Area and surrounds, based on targeted field surveys and existing scientific assessments of the area, including information available from the Department of Climate Change, Energy, the Environment and Water.</p> <p>The ASA acknowledges the potential impacts that activities associated with the construction and operation of the Submarine Construction Yard may have on the environment.</p> <p>Approval of dredging activities is required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.</p> <p><u>Controls to limit potential impacts</u></p> <p>Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Potential mitigations include well-established practices within the construction industry to manage risks, such as the development and implementation of a Dredge Management Plan and the use of suitably-qualified marine fauna spotters to avoid potential collisions with dredging vessels.</p>		
Changes to Draft Report		
<ul style="list-style-type: none"> – Additional description of dredging activities has been incorporated into The Report – Specific descriptions of mitigations to be implemented to manage potential impacts have also been added. 		

4.1.3 The environment

‘The environment’ is defined under section 528 of the EPBC Act. The Draft Report includes an assessment of the likely potential impacts of the Submarine Construction Yard on the environment, as defined under the EPBC Act. The subthemes in this section align with the *Significant Impact Guidelines 1.2* (Commonwealth of Australia 2013b).

This section outlines the comments in submissions received by the ASA that relate to ‘the environment’.

Subthemes

Table 10 outlines the subthemes that the submissions were analysed against regarding comments relating to the whole of environment.



Table 10 Subtheme definitions – the environment

Subtheme	Definition	Table reference	Number of submissions
People and communities	<ul style="list-style-type: none"> – Comments relating to impacts to people and communities, including: <ul style="list-style-type: none"> • Impacts during construction • Impacts during operation • Access to Mutton Cove • Traffic impacts • Amenity impacts (i.e., noise, dust and vibration) • Impacts to utility infrastructure (i.e., water, sewage, electricity). 	Table 11	10
Animals	<ul style="list-style-type: none"> – Comments relating to State and locally important animals and habitat values. 	Table 12	8
Coastal landscapes and processes	<ul style="list-style-type: none"> – Comments relating to the hardening of the shoreline, movement of sand / sediment, dredging, and sea level rise. 	Table 13	7
Ocean forms, ocean processes and ocean life	<ul style="list-style-type: none"> – Comments relating to the Adelaide Dolphin Sanctuary – Comments relating to marine animals. 	Table 14	7
Water resources	<ul style="list-style-type: none"> – Comments relating to water quality – Comments relating to water supply – Comments relating to impacts to surface water – Comments relating to impacts to groundwater. 	Table 15	7
Plants	<ul style="list-style-type: none"> – Comments relating to State and locally important plant species and vegetation. 	Table 16	6
Pollutants	<ul style="list-style-type: none"> – Comments relating to the disturbance of pollutants during construction – Comments relating to the management of pollutants, contaminants and hazardous materials, excluding radioactive material associated with the power module. 	Table 17	4
Landscapes and soils	<ul style="list-style-type: none"> – Comments relating to landscapes of the Submarine. Construction Yard and surrounding area, including changes to ground levels and movement of soils. 	Table 18	3
Natural heritage	<ul style="list-style-type: none"> – Comments relating to impacts to natural heritage values, including the Nationally Important Wetland, Barker Inlet. 	Table 19	2
Historic heritage	<ul style="list-style-type: none"> – Comments relating to impacts to historic heritage values. 	Table 20	2
Indigenous heritage	<ul style="list-style-type: none"> – Comments relating to impacts to Kaurua heritage values. 	Table 21	1

Submissions analysis – the environment

Table 11 Comments received – people and communities

Theme	Summary	Number of submissions
People and communities	<ul style="list-style-type: none"> – Comments about the long-term impacts of construction and operation on the surrounding environment, due to the value placed on the region as a recreation location for fishers, paddlers and other waterway users – Comment about potential health impacts resulting from temporary sediment dispersion from dredging, specifically regarding the consumption of fish caught in the waterways – Comment that communities already facing amenity impacts from works on the Lefevre Peninsula, including the risk of displacement due to house prices; noise, vibration and dust from traffic movements; and quality of life. – Comment about impacts to visual amenity resulting from the Project – Comments about public access to Mutton Cove. 	10



Response to comments

The ASA is committed to providing transparency to the process wherever possible and will be providing further information and updates to the community as different stages in the development of the Submarine Construction Yard progress.

Potential impacts

Water quality and marine habitats within the Port Adelaide River will be monitored during dredging activities, and adaptive management processes will be implemented, to meet guideline values which will be established prior to undertaking the activity. Dredging will be scheduled to minimise impacts to fisheries by minimising encroachment into seagrass flowering periods.

Approval of dredging activities is also required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.

The ASA recognises the importance of adequate transport planning and network upgrades, where required, that can accommodate the increase in workers for shipbuilding activities at the Submarine Construction Yard once operational. As such, the ASA is working closely with the South Australian Government and with ANI to identify opportunities for infrastructure upgrades to improve traffic flow for the local community. In parallel to The Plan, a master planning process has been initiated by the South Australian Government. Planning and investment in infrastructure is intended to improve service delivery to the community.

The ASA understands the desire from the community to maintain a level of connection and access to Mutton Cove. As an outcome of the Strategic Assessment, the ASA is committed to developing a process to assess the potential for access to Mutton Cove for specified purposes.

Controls to limit potential impacts

Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Potential mitigations include well-established practices within the construction industry to manage risks.

The ASA is committed to working with the community and local councils to minimise potential impacts to the community during the construction and operation of the Submarine Construction Yard. As an outcome of the Strategic Assessment, the ASA intend to provide information to the community as construction progresses, and measures are implemented to manage potential construction impacts on local residents.

Changes to Draft Report

- Additional detail provided on dredging activities and mitigations to manage potential impacts.

Table 12 Comments received – animals

Theme	Summary	Number of submissions
Animals	<ul style="list-style-type: none"> - Comment about potential impacts to animals due to construction activities - Comments calling for further ecological advice to understand and mitigate impacts to fauna in conservation areas and sanctuaries - Comment about the importance of auditing, monitoring and future compliance reporting throughout the duration of the development. 	8

Response to comments

The ASA is aware that the region surrounding the Strategic Assessment Area provides habitat for a number of animals.

Potential impacts

Indirect and direct impacts to animals have the potential to occur in relation to Actions associated with the Construction of the Submarine Construction Yard Class of Action.

Disturbance associated with the Submarine Construction Yard is limited to undertaking works within the Strategic Assessment Area, and the movement of vessels containing dredged material for disposal to Gulf St Vincent.

The Report has included a detailed assessment of potential impacts to animals and to the environment more broadly. Details of these assessments are included in The Report and other supporting reports. These set out the comprehensive process the ASA has undertaken to identify species likely to be present within the Strategic Assessment Area and surrounds, based on targeted field surveys and existing scientific assessments of the area, including information available from the Department of Climate Change, Energy, the Environment and Water.

The ASA acknowledges the potential impacts of activities associated with the construction and operation of the Submarine Construction Yard can cause on the environment. Impacts to species which use Bird Island, Mutton Cove and the Port Adelaide River may occur as a result of noise disturbances. Appropriate controls have been identified.

Approval of dredging activities is also required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.



Controls to limit potential impacts

Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Potential mitigations include well-established practices within the construction industry to manage risks. The timing of activities such as dredging will be scheduled to minimise encroachment into dolphin calving periods, in order to minimise impacts to the resident dolphin population of the Adelaide Dolphin Sanctuary.

Lighting design for construction and operation would be undertaken in accordance with relevant standards and guidelines to meet safety requirements. The relevant standards and guidelines that will be considered in the design of lighting within the Strategic Assessment Area are outlined in The Report.

Changes to Draft Report

- Additional detail provided on dredging activities and mitigations to manage potential impacts
- Additional description and context of existing lighting conditions has been added to Section 6.10 of the Draft Report (now Section 6.12 of The Report) to provide information on potential light pollution impacts.

Table 13 Comments received – coastal landscapes and processes

Theme	Summary	Number of submissions
Coastal landscapes and processes	<ul style="list-style-type: none"> – Comment about dredging resulting in the disturbance of potential legacy contaminants on the bed of the Port Adelaide River and causing impacts to water quality – Comments about existing impacts to the area resulting from previous dredging activities – Comment about the potential impact to the Submarine Construction Yard in the event of sea level rise – Comment about the potential future risk of collapse of the Mutton Cove seawall and associated potential impacts to the Submarine Construction Yard, surrounding infrastructure, local environment and community – Comment about the importance of auditing, monitoring and future compliance reporting throughout the duration of the development. 	7

Response to comments

The ASA is aware that existing water quality within the Port Adelaide River estuary has been the subject of past investigations and review.

Potential impacts

Water quality and marine habitats within the Port Adelaide River will be monitored during dredging activities, and adaptive management processes will be implemented, to meet guideline values which will be established prior to undertaking the activity.

Approval of dredging activities is required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.

The ASA recognises the potential risk of rising sea levels associated with climate change, including the increased risk of coastal flooding and storm surges across the Strategic Assessment Area.

The Submarine Construction Yard will be designed such that finished ground levels are above the predicted sea level rise.

Controls to limit potential impacts

Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Potential mitigations include well-established practices within the construction industry to manage risks.

The Submarine Construction Yard will be designed to include measures to manage stormwater and the use of pollutants and chemicals. Careful consideration has been given to how the proposed measures will integrate with the local environment, in order to develop a design that can be readily implemented.

Changes to Draft Report

- Additional detail provided on dredging activities and mitigations to manage potential impacts.

Table 14 Comments received – ocean forms, processes and ocean life

Theme	Summary	Number of submissions
Ocean forms, processes and ocean life	<ul style="list-style-type: none"> – Comment about the existing health of dolphins due to pollution from the Port Adelaide River – Comments about potential impacts to dolphins resulting from the Project – Comments about existing water quality and concern about the Project exacerbating this issue – Comments about potential impacts to marine life resulting from dredging. 	7
Response to comments		
<p>The ASA is aware that existing water quality within the Port Adelaide River estuary has been the subject of past investigations and review.</p> <p><u>Potential impacts</u></p> <p>The ASA understands that previous dredging campaigns undertaken by others, including Flinders Ports, within the Port Adelaide River estuary have resulted in decreased water quality within the Port Adelaide River. The ASA also acknowledges that any future dredging within the Port Adelaide River estuary and Barker Inlet must consider the requirements of the Adelaide Dolphin Sanctuary.</p> <p>Approval of dredging activities is required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.</p> <p><u>Controls to limit potential impacts</u></p> <p>Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Potential mitigations include well-established practices within the construction industry to manage risks. The timing of activities such as dredging will be scheduled to minimise encroachment into dolphin calving periods, to minimise impacts to the resident dolphin population of the Adelaide Dolphin Sanctuary.</p> <p>The Submarine Construction Yard will be designed to include measures to manage stormwater and the use of pollutants and chemicals. Careful consideration has been given to how the proposed measures will integrate with the local environment, in order to develop a design that can be readily implemented.</p>		
Changes to Draft Report		
<ul style="list-style-type: none"> – Additional detail provided on dredging activities and mitigations to manage potential impacts. 		

Table 15 Comments received – water resources

Theme	Summary	Number of submissions
Water resources	<ul style="list-style-type: none"> – Comments about stormwater runoff and requests for further information about how local hydrology, groundwater movement, and stormwater will be impacted by the development – Comments about the existing water quality of the Port Adelaide River and concerns about the cumulative impact of this development. 	7
Response to comments		
<p>The ASA is aware that existing water quality within the Port Adelaide River estuary has been the subject of past investigations and review.</p> <p><u>Potential impacts</u></p> <p>The ASA understands that previous dredging campaigns undertaken by others, including Flinders Ports, within the Port Adelaide River estuary have resulted in decreased water quality within the Port Adelaide River.</p> <p>Approval of dredging activities is required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.</p> <p><u>Controls to limit potential impacts</u></p> <p>Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Proposed mitigations include well-established practices within the construction industry to manage risks. Potential impacts associated with drainage and hydrological changes will be managed through design and operational management of the Submarine Construction Yard. That is, potential hydrological effects would be avoided or reduced through design and management, as is currently affected by the existing stormwater management system.</p>		



The Submarine Construction Yard will be designed to include measures to manage stormwater and the use of pollutants and chemicals. Careful consideration has been given to how the proposed measures will integrate with the local environment, in order to develop a design that can be readily implemented.

Changes to Draft Report

- Additional detail provided on dredging activities and mitigations to manage potential impacts
- Additional detail of existing contaminants within the Port Adelaide River.

Table 16 Comments received – plants

Theme	Summary	Number of submissions
Plants	<ul style="list-style-type: none"> - Comments about potential impacts to mangroves, saltmarsh and seagrass - Comment about the current weed management issue on the site, and the opportunity to rectify this - Comment that the removal of seagrass should be included as a vegetation clearing activity, and the impact should be offset - Agreement with the risk rating of 'high' for vegetation clearing noted in Appendix H of the Draft Report. 	6

Response to comments

The ASA recognises that seagrass meadows, mangroves and saltmarsh perform important ecological functions within the region surrounding the Strategic Assessment Area.

Potential impacts

Direct impacts to plants, including the clearing of vegetation, have the potential to occur in relation to Actions associated with the Construction of the Submarine Construction Yard Class of Action.

Disturbance associated with the Submarine Construction Yard includes works within the Strategic Assessment Area and the transfer of dredged material to Gulf St Vincent.

The Report has included a detailed assessment of potential impacts to plants and to the environment more broadly. Details of these assessments are included in The Report and other supporting reports. These set out the comprehensive process the ASA has undertaken to identify species likely to be present within the Strategic Assessment Area and surrounds, based on targeted field surveys and existing scientific assessments of the area, including information available from the Department of Climate Change, Energy, the Environment and Water.

The ASA acknowledges the potential impacts of activities associated with the construction and operation of the Submarine Construction Yard can cause on the environment. The removal of seagrass within the Strategic Assessment Area constitutes clearing of native vegetation under the South Australian *Native Vegetation Act 1991*. The appropriate approvals will be sought prior to the removal of seagrass within the Strategic Assessment Area.

Approval of dredging activities is also required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.

Controls to limit potential impacts

Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard, including scheduling dredging activities to minimise encroachment into seagrass flowering periods.

Changes to Draft Report

- Additional detail provided on dredging activities and mitigations to manage potential impacts.



Table 17 Comments received – pollutants

Theme	Summary	Number of submissions
Pollutants	<ul style="list-style-type: none"> Comments about existing poor water quality due to pollution from legacy industrial use and resulting pollution impacts from dredging activities. 	4
Response to comments		
<p>The ASA is aware that existing water quality within the Port Adelaide River estuary has been the subject of past investigations and review.</p> <p><u>Potential impacts</u></p> <p>The ASA understands that previous dredging campaigns undertaken by others, including Flinders Ports, within the Port Adelaide River estuary have resulted in decreased water quality within the Port Adelaide River.</p> <p>Water quality and marine habitats within the Port Adelaide River will be monitored during dredging activities, and adaptive management processes will be implemented, to meet guideline values which will be established prior to undertaking the activity.</p> <p>Approval of dredging activities is also required under South Australian legislation prior to the commencement of the action. This approval will require the development of a Dredge Management Plan to detail how the activity will be managed to minimise potential impacts.</p> <p><u>Controls to limit potential impacts</u></p> <p>Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Proposed mitigations include well-established practices within the construction industry to manage risks.</p> <p>The Submarine Construction Yard will be designed to include measures to manage stormwater and the use of pollutants and chemicals. Careful consideration has been given to how the proposed measures may integrate with the local environment, in order to develop a design that can be readily implemented.</p>		
Changes to Draft Report		
<ul style="list-style-type: none"> Additional detail provided on dredging activities and mitigations to manage potential impacts. 		

Table 18 Comments received – landscapes and soils

Theme	Summary	Number of submissions
Landscapes and soils	<ul style="list-style-type: none"> Comment about the need for the development of a soil erosion drainage management plan for construction Comment about the potential for soil disturbance leading to acidification of surrounding environments. 	3
Response to comments		
<p>The ASA recognises the importance of appropriate management of soils during the construction of the Submarine Construction Yard, to prevent widespread erosion. The ASA and ANI are familiar with the risk of potential acidification associated with the disturbance of acid sulfate soils.</p> <p><u>Potential impacts</u></p> <p>Water quality and marine habitats within the Port Adelaide River will be monitored during dredging activities, and adaptive management processes will be implemented, to meet guideline values which will be established prior to undertaking the activity.</p> <p>The potential impacts from bulk earthworks and other soil disturbing activities which have potential to result in mobilisation of sediment and changes to soil chemistry, will be managed through implementing well established controls aligned with industry standards and South Australian Government requirements.</p> <p><u>Controls to limit potential impacts</u></p> <p>Avoidance and mitigation measures will be incorporated into the design, construction and operation of the Submarine Construction Yard. Proposed mitigations include well-established practices within the construction industry to manage risks.</p>		
Changes to Draft Report		
<ul style="list-style-type: none"> Additional detail provided on dredging activities and mitigations to manage potential impacts. 		



Table 19 Comments received – natural heritage

Theme	Summary	Number of submissions
Natural heritage	<ul style="list-style-type: none"> – Comments about impacts to Mutton Cove resulting from the Project – Comment about the role locations such as the Port Adelaide River, Torrens Island, St Kilda Wetland and Barker Inlet play in providing natural habitat. 	2
Response to comments		
<p>The ASA acknowledges that the region surrounding the Submarine Construction Yard contains areas (including the Adelaide Dolphin Sanctuary, nationally important wetlands, and Adelaide International Bird Sanctuary) that possess natural values.</p> <p><u>Potential impacts</u></p> <p>The onshore area of the Strategic Assessment Area is located on disturbed land, that has been subject to substantial modification since reclamation activities began in 1916, and has limited natural heritage values.</p> <p>There are no documented heritage places with natural heritage values within the Strategic Assessment Area. Additionally, there are no documented important sight lines associated with surrounding natural areas; and the infrastructure to be developed within the Submarine Construction Yard would be consistent in terms of size and scale with other industrial developments on the Lefevre Peninsula, including the existing Osborne Naval Shipyard.</p> <p>Disturbance associated with the Submarine Construction Yard is limited to undertaking works within the Strategic Assessment Area, and does not include direct impacts to Mutton Cove or Torrens Island.</p>		
Changes to Draft Report		
No change		

Table 20 Comments received – historic heritage

Theme	Summary	Number of submissions
Historic heritage	<ul style="list-style-type: none"> – Comment about the general impact of the Project to the heritage values of the area – Comment that the Draft Report has not adhered to the <i>Heritage Places Act 1993</i> in the assessment of heritage significance. 	2
Response to comments		
<p><u>Potential impacts</u></p> <p>No sites or places listed under the <i>Heritage Places Act 1993</i> were identified as being directly impacted by the construction or operation of the Submarine Construction Yard, either within the Strategic Assessment Area or Gulf St Vincent.</p> <p>The ASA has previously confirmed that there are heritage sites and places—including the Torrens Island Quarantine Station, Outer Harbor Pilot Station and locations around Port Adelaide—in the region surrounding the Strategic Assessment Area. However, no direct impacts to these heritage places are anticipated as a result of the construction or operation of the Submarine Construction Yard.</p>		
Changes to Draft Report		
<ul style="list-style-type: none"> – Additional detail provided on dredging activities and mitigations to manage potential impacts – Amended Section 6.12 of the Draft Report (now Section 6.14 of The Report) to include reference to the <i>Heritage Places Act 1993</i> as legislation relevant to heritage places. 		

Table 21 Comments received – Indigenous heritage

Theme	Summary	Number of submissions
Indigenous heritage	<ul style="list-style-type: none"> – Comments about the need to prepare a detailed cultural heritage management plan, and identify the impact to cultural heritage sites. 	1
Response to comments		
<p>The ASA understands the importance of sensitive management of cultural heritage.</p> <p><u>Potential impacts</u></p> <p>No cultural heritages sites were identified as likely to be impacted by the construction and operation of the Submarine Construction Yard.</p>		



Controls to limit potential impacts

Cultural heritage management measures will be incorporated into the construction and operation of the Submarine Construction Yard, including implementing a procedure to be adhered to in the event of a discovery that includes stoppage or redirection of works in the vicinity of the discovery.

The ASA will continue to engage with the KYAC as the Registered Native Title Body Corporate, to identify approaches to achieve shared outcomes for First Nations people.

Changes to Draft Report

No change

4.1.4 Sections of the Draft Report

The Draft Report was prepared in accordance with the Strategic Assessment Agreement and Terms of Reference, and published for the Public Comment Period. Subthemes analysed in this section relate to elements of the Draft Report.

This section outlines the comments in submissions received by the ASA that relate to the Draft Report.

Subthemes

Table 22 outlines the subthemes that the submissions were analysed against regarding comments relating to the Draft Report.

Table 22 Subtheme definitions – Draft Report

Subtheme	Definition	Table reference	Number of submissions
Mitigation measures	– Comments about mitigation measures in the Draft Report.	Table 23	4
Legislative context	– Comments about legislation that drives the Draft Report.	Table 24	2
Risk assessment	– Comments about the risk assessment in the Draft Report.	Table 25	1
Outcomes and commitments	– Comments about outcomes and commitments in the Report.	Table 26	1

Submissions analysis – Draft Report

Table 23 Comments received – mitigation measures

Theme	Summary	Number of submissions
Mitigation measures	– Comment about the need for mitigation measures needing to be developed in engagement with relevant subject matter experts, key stakeholders and the community.	4

Response to comments

Mitigation measures

The mitigation measures outlined in the Draft Report were developed in consultation with ANI (as the proponent of the EIS) to align with the measures outlined in the Draft EIS. The proposed mitigation measures align with requirements of South Australian legislation, and have been identified as the minimum standard that the ASA and ANI will require to be implemented during the construction and operation of the Submarine Construction Yard.

Outcomes and commitments

The ASA is committed to working with the community and local councils to minimise potential impacts to the community during the construction and operation of the Submarine Construction Yard. As an outcome of the Strategic Assessment, the ASA intend to provide information to the community as construction progresses, and measures are implemented to manage potential construction impacts on local residents.

Changes to Draft Report

The description of mitigation measures has been revised to provide clarity on the specific actions to be implemented to mitigate impacts.



Table 24 Comments received – legislative context

Theme	Summary	Number of submissions
Legislative context	<ul style="list-style-type: none"> – Comment about the application of the EPBC Act for the Project – Comment providing suggested edits to the sections on <i>Australian Radiation Protection and Nuclear Safety Act 1998</i> and <i>Nuclear Non-Proliferation (Safeguards) Act 1987</i>. 	2
Response to comments		
<p><u>EPBC Act</u></p> <p>The EPBC Act and Regulations are Australia’s main national environmental legislation, and provide for the protection and management of nationally and internationally important plants, animals, habitats and places. The EPBC Act also protects the environment when actions are taken by an Australian Government agency. As the ASA is an Australian Government agency, and the construction and operation of the Submarine Construction Yard has the potential to result in a significant impact to the environment, an assessment against the EPBC Act is required.</p> <p>A Strategic Assessment under Part 10 of the EPBC Act is the assessment process which has been agreed with the Commonwealth Department of Climate Change, Energy, the Environment and Water to enable early consideration of environmental impacts, provide the community with greater certainty, and support the capacity to achieve better environmental outcomes and address cumulative impacts at a landscape level.</p> <p><u>Australian Naval Nuclear Power Safety Act 2024</u></p> <p>The ASA appreciates the effort taken to review this section of the Draft Report. The ASA has revised the section of text in Section 4.3 of The Report.</p> <p><u>Nuclear Non-Proliferation (Safeguards) Act 1987</u></p> <p>The ASA appreciates the effort taken to review this section of the Draft Report. The ASA accepts the suggested edits to Section 4.6 of The Report made in a submission to clarify permits and licence descriptions.</p>		
Changes to Draft Report		
<p>The ASA has updated Chapter 4 of The Report to make minor amendments to sections on the <i>Australian Naval Nuclear Power Safety Act 2024</i> and <i>Nuclear Non-Proliferation (Safeguards) Act 1987</i>, in response to minor text edits suggested in a submission.</p>		

Table 25 Comments received – risk assessment

Theme	Summary	Number of submissions
Risk assessment	<ul style="list-style-type: none"> – Comment that the risk rating for potential impacts to migratory shorebirds during construction should be higher. 	1
Response to comments		
<p><u>Risk assessment</u></p> <p>The ASA appreciates the interest and time taken to review the risk assessment within the Draft Report. The risk assessment has been reviewed and updated as part of clarifying the impact assessment pathway, with discussion on the unmitigated risk assessment and mitigated risk assessment incorporated into The Report.</p> <p>The risk assessment was reviewed and updated where needed so that the potential risks to migratory shorebirds, and subsequent risk ratings, were assessed to be appropriate within the context of the potential impacts.</p>		
Changes to Draft Report		
<p>The risk assessment has been revised to consider impacts to relevant Protected Matters as a result of dredging, and for consistency of risk ratings across Protected Matters.</p>		

Table 26 Comments received – outcomes and commitments

Theme	Summary	Number of submissions
Outcomes and commitments	<ul style="list-style-type: none"> – Comment that welcomed the commitment to “seek opportunities to incorporate ecologically sustainable principles into design”. 	1



Response to comments

Outcomes and commitments

The ASA is pleased to present the outcomes and commitments of the Strategic Assessment Plan. The ASA is committed to delivering the outcomes and commitments of the Strategic Assessment Plan, with further detail on the implementation and achievement of these outcomes and commitments to be incorporated into subordinate implementation plans.

Changes to Draft Report

Some updates have been made to the outcomes and commitments as part of review and updates to the Strategic Assessment Plan in consultation with the Department of Climate Change, Energy, the Environment and Water. Whilst final versions of the outcomes and commitments may have altered from the Draft Report published on 3 February 2025, the intent of these outcomes and commitments remains unchanged.

4.1.5 Agreed excluded actions

Agreed excluded actions refer to specific actions identified in the Strategic Assessment Agreement as being outside the scope of the assessment.

This section outlines the comments in submissions received by the ASA that relate to agreed excluded actions.

Subthemes

Table 27 outlines the subthemes that the submissions were analysed against regarding comments relating to agreed excluded actions.

Table 27 Subtheme definitions – agreed excluded actions

Subtheme	Definition	Table reference	Number of submissions
Commissioning of the power module	<ul style="list-style-type: none"> – Comments relating to commissioning of the power module – Comments relating to waste generated after or associated with the commissioning of the power module – Comments relating to environmental impacts from radiation – Comments relating to safety of the power module – Comments relating to emergency or accident scenarios. 	Table 28	22
Waste facility	<ul style="list-style-type: none"> – Comments related to future short-term low-level radioactive waste storage at Osborne. 	Table 29	17
Long-term disposal of radioactive waste	<ul style="list-style-type: none"> – Comments relating to long-term disposal of low-level radioactive waste. 	Table 30	12
Manufacture and delivery of the reactor power module	<ul style="list-style-type: none"> – Comments relating to the manufacture and delivery of the power module. 	Table 31	4
Skills and training academy campus	<ul style="list-style-type: none"> – Comments relating to facilities to support education and training. 	Table 32	1
Decommissioning of the Submarine Construction Yard	<ul style="list-style-type: none"> – Comments relating to the decommissioning of the Submarine Construction Yard. 	No comments received.	0
Development associated with existing shipyard buildings	<ul style="list-style-type: none"> – Comments related to existing approved development and construction within the Submarine Construction Yard. 	No comments received.	0
Existing operations and services	<ul style="list-style-type: none"> – Comments related to existing operations and uses within the Submarine Construction Yard. 	No comments received.	0
Maintenance dredging	<ul style="list-style-type: none"> – Comments relating to future or ongoing dredging of the Port Adelaide River. 	No comments received.	0

Subtheme	Definition	Table reference	Number of submissions
SSN-AUKUS operation	<ul style="list-style-type: none"> – Comments relating to the operation and maintenance of the submarine – Comments relating to the decommissioning of the submarine. 	No comments received.	0
Sustainment of the SSN-AUKUS	<ul style="list-style-type: none"> – Comments relating to the life of the submarine. 	No comments received.	0

Submissions analysis – agreed excluded actions

Table 28 Comments received – commissioning of the power module

Theme	Summary	Number of submissions
Commissioning of the power module	<ul style="list-style-type: none"> – Comments about the impacts of a nuclear accident on human health, the environment and first responders – Comments that the rating of nuclear accident is exacerbated due to climate risk – Comments regarding the potential impact on sea life due to exposure to tritium – Comments about safety and the need for evacuation plans – Comments about the level of public engagement regarding nuclear elements of the proposal. 	22

Response to comments

Nuclear stewardship

The Australian Government is committed to maintaining the highest levels of nuclear stewardship to protect the health and safety of people and the environment. Safety is paramount, and the Australian Government, Defence and the ASA are committed to safe and secure nuclear propulsion technology for nuclear-powered submarines.

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

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

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

Power module

The commissioning of the power module is an agreed exclusion to the scope of the Strategic Assessment, and will be subject to further assessment and approvals, as outlined below.

In preparation for the commencement of the construction and commissioning of the submarine, a comprehensive emergency preparedness and response (EPR) system will be developed, implemented, validated and sustained at the Submarine Construction Yard at Osborne. The comprehensive EPR capability will provide for an efficient and timely response to any nuclear or radiological emergency, whether on board a submarine or within the waste facility.

The EPR capability will be consistent with International Atomic Energy Agency’s safety standards, integrated with both the South Australian State Hazard Management Framework and the Australian Government Crisis Management Framework. The EPR capability will also meet the requirements of the new Australian Naval Nuclear Power Safety Regulator (ANNPSR). A licence will be issued by ANPPSR once they are satisfied that the EPR meets the requirements of the ANNPS Act.

The EPR capability is centred upon a Nuclear Emergency Response Organisation (NERO) that will maintain a persistent first response capability in the highly unlikely event of a nuclear emergency or radiological incident. The NERO is controlled from an Emergency Control Centre to be built nearby, and will be fully integrated with the South Australian State Hazard Management Agency’s practices, and coordinated with the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in their role as Australian Government Coordinating Agency. These responses will be rigorously tested through small- and large-scale exercises, prior to the ANNPSR being satisfied, to certify the capability and grant a licence to operate.

Environmental monitoring

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

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

- Water sampling
- Sediment sampling
- Biota sampling
- Airborne monitoring
- Shoreline surveys.

The impact of nuclear activities on EPBC Act listed species and the broader flora and fauna of the Port Adelaide Region and surrounding region, will be subject to further environmental assessment.

Changes to Draft Report

No change

Table 29 Comments received – waste facility

Theme	Summary	Number of submissions
Waste facility	<ul style="list-style-type: none"> – Comments that the level of radioactive waste to be stored and the duration will increase beyond anticipated scope – Comment that the community proximity to the site will deter investment of other industries due to the presence of radioactive waste – Comment regarding radioactive waste management being outside the scope of the Strategic Assessment – Comments about safety concerns due to radioactive waste storage – Comment about the level of public engagement around radioactive waste management on site – Comment about the risk rating for contamination resulting from the storage of radioactive materials. 	17

Response to comments

Waste management

As a responsible nuclear steward, Australia will manage all radiological waste from its own SSN-AUKUS submarines domestically, in accordance with Australia’s international legal obligations and commitments, and strict limitations prescribed under Australian regulations. Australia will draw on its 70 years’ of experience with safely and securely managing radioactive waste from facilities like the multi-purpose nuclear reactors managed by the Australian Nuclear Science Technology Organisation (ANSTO) at Lucas Heights.

The submarine construction process is a complex undertaking, involving many industrial processes. When the first of Australia’s SSN-AUKUS nuclear-powered submarines are commissioned in the 2040s, the nuclear reactor and safety systems will be thoroughly tested and operated for the first time, which may result in very small volumes of low-level radioactive waste. While it is not expected that these types of low-level radioactive waste will be generated until later in the build schedule, it is important that we design and build facilities to safely manage and temporarily store low-level radioactive waste in accordance with regulatory requirements.

Most of the low-level radioactive waste will comprise of personal protective equipment, such as gloves and materials including wipes, that may become contaminated when using tools to commission or test parts and systems. Low-level radioactive waste management activities at the Submarine Construction Yard will be similar to those that occur in over 100 locations nationwide, including hospitals, science facilities and universities.

Australia will not manage, store or dispose of spent nuclear fuel or other high-level radioactive waste from the UK, US or any other country. Additionally, no intermediate or high-level radiological waste, including spent nuclear fuel, will be generated or stored at the Submarine Construction Yard at Osborne.

As outlined in Section 3.3.3 of the Draft Report (now Section 3.5 of The Report), construction of the waste facility is not able to be completed without the completion of separate environmental assessment processes.

Submissions received regarding this theme will be incorporated into the future assessment process.

Changes to Draft Report

No change



Table 30 Comments received – long-term disposal of radioactive waste

Theme	Summary	Number of submissions
Long-term disposal of radioactive waste	<ul style="list-style-type: none"> – Comments about the long-term environmental impacts of nuclear waste disposal – Comments about lack of clarity on long-term disposal options for nuclear waste – Comments about Indigenous Australians' right to say no to the storage of high-level nuclear waste on their lands – Comment about the need for genuine public engagement when selecting sites for the long-term storage of nuclear waste – Comment about the challenges currently faced by the UK and the US around the long-term storage of nuclear waste. 	12
Response to comments		
<p><u>Waste management</u></p> <p>As a responsible nuclear steward, Australia will manage all radiological waste from its own SSN-AUKUS submarines domestically, in accordance with Australia's international legal obligations and commitments, and strict limitations prescribed under Australian regulations. Australia will draw on its 70 years' of experience with safely and securely managing radioactive waste from facilities like the multi-purpose nuclear reactors managed by the ANSTO at Lucas Heights.</p> <p>Australia will not manage, store or dispose of spent nuclear fuel or other high-level radioactive waste from the UK, US or any other country. Additionally, no intermediate or high-level radiological waste, including spent nuclear fuel, will be generated or stored at the Submarine Construction Yard at Osborne.</p> <p>A decision on the disposal of radioactive waste from Australia's future conventionally-armed nuclear-powered submarines has not been made. Low-level radioactive waste will not be disposed of at the Submarine Construction Yard. Extensive public consultation, including with First Nations people, will occur as part of a future assessment process.</p>		
Changes to Draft Report		
No change		

Table 31 Comments received – manufacture and delivery of the power module

Theme	Summary	Number of submissions
Manufacture and delivery of the reactor power module	<ul style="list-style-type: none"> – Comment about the safety of transporting nuclear materials and the risks to community on the peninsula – Comment about the need for community certainty about the safety of transportation of nuclear materials – Questions about the quantity and type of radioactive materials to be transported and the safety precautions in place along transport routes. 	4
Response to comments		
<p><u>Nuclear stewardship</u></p> <p>The Australian Government is committed to maintaining the highest levels of nuclear stewardship to protect the health and safety of people and the environment. Safety is paramount, and the Australian Government, Defence and the ASA, ANI and industry partners are committed to safe and secure nuclear propulsion technology for nuclear-powered submarines.</p> <p>The decades of experience offered by the UK and US naval nuclear propulsion programs will enable Australia to become a responsible steward of its conventionally-armed nuclear-powered submarines. The UK and US have never experienced a reactor accident or release of radioactive material that has had an adverse effect on the public or the environment. Australia is committed to upholding these standards.</p> <p>The <i>Australian Naval Nuclear Power Safety Act 2024</i> establishes a dedicated, fit-for-purpose nuclear safety framework to support Australia's nuclear-powered submarine enterprise. This will include an independent regulator focused on the safety of our submariners, Australian and international communities, and the environment. It will impose clear nuclear safety obligations on personnel involved in the enterprise, backed by civil and criminal penalties if contravened.</p> <p><u>Power module</u></p> <p>The manufacturing and transport of the power module is an agreed exclusion to the scope of the Strategic Assessment, and will be subject to further assessment and approvals.</p>		
Changes to Draft Report		
No change		

Table 32 Comments received – skills and training academy campus

Theme	Summary	Number of submissions
Skills and Training Academy Campus	– Comment about the level of ecological investigation undertaken for the Skills and Training Academy Campus.	1
Response to comments		
<u>Skills and Training Academy Campus</u>		
The development of the Skills and Training Academy Campus is being undertaken by ANI and assessed separately to the Strategic Assessment. The development of the Skills and Training Academy Campus was considered as one of several adjacent projects, as part of the assessment of cumulative impacts within the Draft Report and supporting documentation.		
Changes to Draft Report		
No change		

4.1.6 Other

This section outlines the comments in submissions received by the ASA that do not fit in any of the themes or subthemes outlined above, but still require analysis and consideration.

Subthemes

Table 33 below outlines the subthemes that the submissions were analysed against regarding ‘other’ comments received.

Table 33 Subtheme definitions – other

Subtheme	Definition	Table reference	Number of submissions
Consultation	– Comments that relate to the level of information shared by the Project team to community members – Comments that relate to engagement with the Kaurna community.	Table 34	16
Future assessment	– Comments relating to ARPANSA or ANNPSR processes – Comments relating to future State assessments and approvals, including dredging.	Table 35	14
Australia’s National Defence Strategy	– Comments relating to politics, whether in an Australian context (i.e., liberal government) or an international context (i.e., the AUKUS partners).	Table 36	12
Defence spending	– Comments relating to the justification for spending on AUKUS.	Table 37	12
Military threat	– Comments relating to the fear that Adelaide may become a target for terrorism.	Table 38	11
Jobs / employment	– Comments relating to employment opportunities and workforce readiness.	Table 39	3
Existing / future infrastructure	– Comments that relate to infrastructure that may need to be upgraded to accommodate growth from the Project (i.e., roads, transport, water supply, etc.).	Table 40	1
Local and/or State economy	– Any comments relating to economic impacts and benefits resulting from the Project.	No comments received	0
Funding considerations	– Comments that relate to funding for the Project.	No comments received	0
Business impacts	– Comments relating to impacts and opportunities for local businesses.	No comments received	0



Submissions analysis – other

Table 34 Comments received – consultation

Theme	Summary	Number of submissions
Consultation	<ul style="list-style-type: none"> – Comment about the engagement undertaken during the Public Comment Period – Comment about the reach of engagement during the Public Comment Period – Comment about how community feedback may influence changes to the development. 	16
Response to comments		
<p>The ASA is committed to keeping the community and stakeholders informed and has conducted and will continue to conduct ongoing engagement. Formal engagement conducted as part of the Strategic Assessment process has been undertaken in accordance with statutory requirements.</p> <p>Community engagement completed for the Public Comment Period on the Submarine Construction Yard has been delivered in alignment with the requirements listed within the Strategic Assessment Agreement and Terms of Reference.</p> <p><u>Methods of communication and engagement</u></p> <p>All information about the Project is shared in plain English with maps and diagrams. The ASA used factsheets, advertisements, display boards and a dedicated project website to update the community at each public engagement session about changes to the Project and potential impacts.</p> <p>A range of face-to-face and online methods were used to provide opportunities for stakeholders and communities to find out more about the Project, ask questions, and provide feedback. This included:</p> <ul style="list-style-type: none"> – Letters and emails to stakeholders offering briefings and meetings, or providing notification of upcoming community information sessions – Stakeholder briefings and meetings – Drop-in information sessions – Pop-ups in high traffic areas such as shopping centres and local markets – A Project email inbox for community and stakeholder questions and feedback. <p>For more information about the engagement that has been undertaken to date, refer to Sections 2 and 3 of this report.</p> <p>The Public Comment Period was also extended to 35 days between 3 February 2025 and 17 March 2025, to allow additional time for the community and other interested parties to provide comments.</p> <p>The Public Comment Period for the Strategic Assessment was also aligned with the comment period for the Draft EIS prepared by ANI. Comments received against both processes have been shared to allow a collaborative approach to the review of comments received, and to capture any consistent themes or overlap between submissions.</p> <p>Feedback collected during the Public Comment Period has been used to develop and refine the proposed outcomes of the Strategic Assessment, and will also be used to inform future assessment processes required for the Submarine Construction Yard.</p> <p><u>Ongoing engagement</u></p> <p>The ASA has committed to ongoing community information and engagement on the Project as it continues. The ASA has established dedicated engagement teams based in Port Adelaide, close to the Submarine Construction Yard, with a commitment to providing information about Australia’s acquisition of conventionally-armed nuclear-powered submarines to the Lefevre Peninsula and Port Adelaide communities.</p> <p>The ASA attends a range of community events in South Australia, and are committed to building awareness and understanding of the Strategic Assessment. The ASA has been engaging with, and will continue to engage with, Traditional Owners of Kaurna Country, to identify opportunities for further consultation and ongoing engagement; part of these discussions will also involve safeguarding and mitigating impacts to cultural heritage (see Table 21).</p> <p>The engagement approach for the Submarine Construction Yard is aligned with the <i>Interim Guidelines for Engaging with First Nations People and Communities on Assessments and Approvals under the EPBC Act</i> (Commonwealth of Australia 2023).</p>		
Changes to Draft Report		
No change		



Table 35 Comments received – future assessment

Theme	Summary	Number of submissions
Future assessment	<ul style="list-style-type: none"> – Comments about the adequacy of the assessment of environmental and health impacts of the Project – Comments about the lack of assessment on the management of radioactive waste – Comments about the nature of the assessment and exclusion of the operation, sustainment and decommissioning of the SSN-AUKUS from the scope of the Draft Report. 	14
Response to comments		
<p>The ASA understands that the multi-layered assessment and approvals approach that is required for the construction and operation of the Submarine Construction Yard at Osborne can be complex. The ASA is committed to providing transparency to the process wherever possible, and will be providing further information and updates to the community as different stages in the development of the Submarine Construction Yard progress.</p> <p><u>Nuclear technology</u></p> <p>Information on the potential risks and dangers of radioactive waste and nuclear reactors is provided by the nuclear safety regulator. The nuclear safety regulator is responsible for assessing and regulating the conditions for obtaining and maintaining a licence for all nuclear activities, including safe operations, training, personnel competency management and emergency response. This includes substantive and detailed emergency plans. The ASA will continue regular community engagement to understand and address questions and concerns in the community, particularly around nuclear technology.</p> <p><u>Waste management</u></p> <p>As a responsible nuclear steward, Australia will manage all radiological waste from its own SSN-AUKUS submarines domestically, in accordance with Australia's international legal obligations and commitments, and strict limitations prescribed under Australian regulations. Australia will draw on its 70 years' of experience with safely and securely managing radioactive waste from facilities like the multi-purpose nuclear reactors managed by the ANSTO at Lucas Heights.</p>		
Changes to Draft Report		
No change		

Table 36 Comments received – Australia's National Defence strategy

Theme	Summary	Number of submissions
Australia's National Defence strategy	<ul style="list-style-type: none"> – Comments about the AUKUS alliance and Australia's relationship with alliance nations – Opposition to AUKUS, calling for access to more information, engagement with the community and public debate about policy decisions. 	12
Response to comments		
<p>While the call for comments was specific to the environmental assessment process for the Actions and Classes of Actions described in the Draft Report and supporting documentation for the Submarine Construction Yard, and not related to broader Australian Government strategy and geopolitical events, the ASA is able to provide the below response.</p> <p><u>Non-proliferation of nuclear weapons – Australia's obligations and commitments</u></p> <p>Australia does not have and will not seek to acquire nuclear weapons. Australia is committed to setting the highest non-proliferation standard for the acquisition of its conventionally-armed nuclear-powered submarines. Australia will continue to fulfil its international obligations, including as a non-nuclear-weapon state, under the <i>Treaty on the Non-Proliferation of Nuclear Weapons</i> (NPT), and as a party to the <i>South Pacific Nuclear Free Zone Treaty</i> (Treaty of Rarotonga). Naval nuclear propulsion is consistent with both the NPT and the Treaty of Rarotonga.</p> <p>The ASA is committed to engaging with communities in South Australia to understand their concerns and provide information about Australia's acquisition of nuclear-powered submarines. This engagement is ongoing and intends to ensure that the work to deliver nuclear-powered submarines is mindful of, and beneficial to, local communities. Refer to the ASA website for more information on the use of conventionally-armed nuclear-powered submarines (https://www.asa.gov.au/).</p>		
Changes to Draft Report		
No change		



Table 37 Comments received – Defence spending

Theme	Summary	Number of submissions
Defence spending	– Comment that the money being spent by the Australian Government on AUKUS should be invested into addressing other issues such as climate change, healthcare, education and infrastructure.	12
Response to comments		
The call for comments was specific to the environmental assessment process for the Actions and Classes of Actions described in the Draft Report and supporting documentation for the Submarine Construction Yard, and not related to broader Australian Government strategy and geopolitical events. The ASA is not able to provide comment on Australian Government spending or budget decisions.		
Changes to Draft Report		
No change		

Table 38 Comments received – military threat

Theme	Summary	Number of submissions
Military threat	– Comments about security risks of conventionally-armed nuclear-powered submarines in the region.	11
Response to comments		
While the call for comments was specific to the environmental assessment process for the Actions and Classes of Actions described in the Draft Report and supporting documentation for the Submarine Construction Yard, and not related to broader Australian Government strategy and geopolitical events, the ASA is able to provide the below response.		
<u>Non-proliferation of nuclear weapons – Australia’s obligations and commitments</u>		
Australia does not have and will not seek to acquire nuclear weapons. Australia is committed to setting the highest non-proliferation standard for the acquisition of its conventionally-armed nuclear-powered submarines. Australia will continue to fulfil its international obligations, including as a non-nuclear-weapon state, under the <i>Treaty on the Non-Proliferation of Nuclear Weapons</i> (NPT) and as a party to the <i>South Pacific Nuclear Free Zone Treaty</i> (Treaty of Rarotonga). Naval nuclear propulsion is consistent with both the NPT and the Treaty of Rarotonga.		
The ASA is committed to engaging with communities in South Australia to understand their concerns and provide information about Australia’s acquisition of nuclear-powered submarines. This engagement is ongoing and intends to ensure that the work to deliver nuclear-powered submarines is mindful of, and beneficial to, local communities. Refer to the ASA website for more information on the use of conventionally armed, nuclear-powered submarines (https://www.asa.gov.au/).		
Changes to Draft Report		
No change		

Table 39 Comments received – jobs / employment

Theme	Summary	Number of submissions
Jobs / employment	– Opportunity for the Project to provide employment for decades to come – Comments about employment opportunities going to non-local residents.	3
Response to comments		
<u>Employment opportunities</u>		
The development of the Submarine Construction Yard at Osborne is anticipated to require up to 4,000 workers during the design and construction phase, with a further 4,000 to 5,000 direct jobs created to build nuclear-powered submarines. Excluding the tier two and three supply chain, the program is anticipated to create up to 20,000 Australian jobs over the next 30 years.		
The ASA are actively promoting career pathways and have supported the development of the South Australian Skills and Training Academy Campus, as part of an Australian Government workforce initiative to provide training opportunities to prepare Australia’s future shipbuilding and submarine workforce. Further information on career pathways can be found on the ASA website (https://www.asa.gov.au/).		
Changes to Draft Report		
No change		



Table 40 Comments received – existing / future infrastructure

Theme	Summary	Number of submissions
Existing / future infrastructure	– Comment about the southern carpark developed by ANI.	1
Response to comments		
<u>Existing infrastructure</u>		
<p>The existing Osborne South Carpark was developed by ANI and was exempt from assessment under the <i>Planning Development and Infrastructure Act 2016</i>, in accordance with Schedule 4, section 21 of the <i>Planning Development and Infrastructure (General) Regulations 2017</i>. Schedules 16 and 17 of the <i>Planning Development and Infrastructure (General) Regulations 2017</i> indicate which areas are designated as a “car park”.</p> <p>The cumulative impact of the existing carpark and the future development on the Lefevre Peninsula has been considered as part of the Draft Report.</p>		
Changes to Draft Report		
No change		

4.2 State Environmental Impact Statement submission summary

Submissions received on the Draft EIS prepared by ANI were reviewed by the ASA to capture and consider any feedback relating to the scope of the Draft Report.

Responses to these submissions are captured in the EIS Response Document, which is available on the PlanSA website (https://plan.sa.gov.au/development_applications/state_development/impact-assessed-development/majors/major_projects/majors/nuclear-powered-submarine-construction-yard-project).

5. Summary

The Supplementary Report consolidates, and analyses feedback and formal submissions received about the Submarine Construction Yard, during the Public Comment Period for the Draft Report.

5.1 Modifications to the Draft Report

The following modifications to the Draft Report have been made in response to the submissions received:

- Additional description of dredging activities, including the transfer of material to Gulf St Vincent, has been incorporated into The Report
- Specific descriptions of mitigations to be implemented to manage potential impacts have been added to The Report
- Additional description and context of existing lighting conditions has been added to Section 6.10 of the Draft Report (now Section 6.12 of The Report) to provide information on potential light pollution impacts
- Amended Section 6.12 of the Draft Report (now Section 6.14 of The Report) to include reference to the *Heritage Places Act 1993* as legislation relevant to heritage places
- Updated Chapter 4 of The Report to make minor amendments to sections on *Australian Radiation Protection and Nuclear Safety Act 1998* and *Nuclear Non-Proliferation (Safeguards) Act 1987*, in response to minor edits suggested in a submission.

5.2 Public Comment Period approach and activities

The Public Comment Period approach for the Draft Report was delivered in accordance with the requirements of the Strategic Assessment Agreement, and involved:

- Public notification of the Public Comment Period through newspaper advertisement, social media updates and emails to existing stakeholders and distribution lists
- Ensuring the availability of all documentation for public comment at the local library, on the ASA webpage, and by request
- Attendance at targeted stakeholder meetings
- Attendance at community information sessions.

The Public Comment Period for the Submarine Construction Yard was delivered in collaboration with the exhibition of the Draft EIS for the Submarine Construction Yard, and initial consultation by the South Australian Government on the Masterplan for the Lefevre Peninsula.

The purpose of this interagency approach to engagement was to allow the community and stakeholders to provide feedback on each project in one setting, as well as to allow the Project team to direct relevant questions to the right organisation.

5.3 Feedback and submissions

The Public Comment Period provided an opportunity to discuss the Project, answer questions, and seek feedback; as well as encourage community members and stakeholders to make submissions. Staff who attended the community information sessions took notes during their conversations to record the discussions and issues raised.

During the Public Comment Period, community members and stakeholders were encouraged to make a submission via the form on the ASA website, via email, or in a hard copy form at one of the community information sessions. The ASA have also reviewed the submissions received by ANI on the Draft EIS.

In total, the ASA received 41 submissions. Key themes that arose in these submissions included:

- Comments about potential impacts to species including migratory bird species, sealions and dolphins
- Comments about potential impacts to native habitat, particularly as a result of construction activities including dredging
- Comments about the loss of public access to areas such as Mutton Cove for recreation and fishing
- Comments about the engagement process
- Safety concerns and environmental impacts that may result from a nuclear accident, and the temporary and long-term storage of radioactive waste.



6. References

Australian Submarine Agency (2025). Major milestone for South Australia's Skills and Training Academy. Available from: <https://www.asa.gov.au/news/major-milestone-south-australias-skills-and-training-academy>

Commonwealth of Australia (2013a). A Guide to undertaking Strategic Assessments. Available from: https://www.agriculture.gov.au/sites/default/files/documents/strategic-assessment-guide_1.pdf

Commonwealth of Australia (2013b). Significant Impact Guidelines 1.2: Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies. Available from: https://www.dcceew.gov.au/sites/default/files/documents/commonwealth-guidelines_1.pdf

Commonwealth of Australia (2023). Interim Engaging with First Nations People and Communities on Assessments and Approvals under the Environment Protection and Biodiversity Conservation Act 1999. Available from: <https://www.dcceew.gov.au/sites/default/files/documents/interim-engaging-with-first-nations-people-and-communities-assessments-and-approvals-under-epbc-act.pdf>

Department of the Premier and Cabinet (DPC) (2024). Principles of engagement. Available from: <https://www.dpc.sa.gov.au/responsibilities/community-engagement/principles-of-engagement>

Appendices

Appendix A

Strategic Assessment Agreement Index

Clause	Details	Response	Reference in this report
3. Definitions			
3.2	Supplementary SIAR means a report, provided for in clause 8.5, which includes: a) a summary of all the public comments received in response to the draft SIAR; and	Section 4.1 of the Supplementary Report provides a summary of the themes raised in all public comments received on the Draft Report.	Section 4.1
3.2	b) sets out how comments have been addressed through modification/s to the SIAR, if any, following the Public Comment Period on the draft SIAR.	Section 4.1 of the Supplementary Report outlines where modifications have been made to the Draft Report in response to submissions received.	Section 4.1
5. Coordination of the Commonwealth and State Assessment Process			
5.1	Steps or processes in the assessment of the Impacts to which this Agreement relates may be done concurrently with any State environment assessment processes, provided that doing so will meet the requirements of each law.	Section 3.2 outlines the approach taken to complete the State environmental assessment public notification period concurrently with the Strategic Assessment.	Section 3.2
5.2	Measures to achieve streamlining between the State and Commonwealth environmental assessment processes may include but are not limited to:	Section 3.2 outlines the approach taken to complete the State environmental assessment public notification period concurrently with the Strategic Assessment.	Section 3.2
	a) Centralisation and coordination of public engagement periods on the draft Terms of Reference prepared under the EPBC Act.		
	b) The drafting and provision of a single draft and final SIAR that addresses both State and Commonwealth matters.	The Draft Report was published for public comment for the period between 3 February 2025 and 17 March 2025. The Final Report will include amendments as outlined in Section 4, to respond to public submissions.	Section 4
	c) Coordinated review of the draft SIAR and draft Plan including the provision of a consolidated response document, that includes comments of South Australia and Commonwealth.	The ASA are working with the Commonwealth Department of Climate Change, Energy, the Environment and Water for the review of the Draft Report and Draft Plan. Comments received from South Australia during the Public Comment Period have been incorporated into Section 4.	Section 4
d) Centralisation and coordination of public engagement periods on the draft SIAR, to be managed by ASA.	Section 3.2 outlines the approach taken to centralise and coordinate the Public Notification Period for the State environmental assessment concurrently with the Strategic Assessment.	Section 3.2	
8. Preparation of the Plan and SIAR			
8.4	Following completion of the process set out in clauses 8.1 – 8.2 of this Agreement, ASA will publish the draft SIAR, and by notice invite public comment on the draft SIAR. ASA must ensure that the notification: a) is posted on the ASA webpage (or any other appropriate webpage approved by the Environment Department) at a minimum for the period of public engagement specified by the Commonwealth Minister (of at least 28 days);	Section 3.3.1 outlines the notification process for the publication of the Draft Report for public comment, for the 35 day period between 3 February 2025 and 17 March 2025. Notification was provided on the ASA webpage.	Section 3.3.1



Clause	Details	Response	Reference in this report
	b) is published in a national daily newspaper on the first day of the period mentioned in clause 8.4(a);	Section 3.3.1 outlines how the Draft Report was published for public comment, for the 35 day period between 3 February 2025 and 17 March 2025. Notification was published in the Adelaide Advertiser. A copy of the newspaper notification is provided in Appendix B.	Section 3.3.1 Appendix B
	c) invites public comment on the draft SIAR for the period mentioned in clause 8.4(a); and	Section 3.3.1 outlines how the Draft Report was published for public comment for the 35 day period 3 February 2025 to 17 March 2025. Notification was published in the Adelaide Advertiser. A copy of the newspaper notification is provided in Appendix B.	Section 3.3.1 Appendix B
	d) mentions: <ul style="list-style-type: none"> i. that the draft SIAR is available for public comment; ii. the period for public comment specified by the Commonwealth Minister; iii. the provision of the EPBC Act that requires the draft SIAR to be published (i.e., section 146(2)(b)); iv. where and how copies may be obtained in an electronic and hard copy form without charge or at a reasonable cost; v. contact details for obtaining further information, including reasonable access for persons with special needs; and vi. the address to which public comments should be provided. 	Section 3.3.1 outlines how the Draft Report was published for public comment for the 35 day period 3 February 2025 to 17 March 2025. Notification was published in the Adelaide Advertiser. A copy of the newspaper notification is provided in Appendix B.	Section 3.3.1 Appendix B
8.5	Following consideration of any public comments received, ASA will prepare, and then submit to the Environment Department for further comment:	Copies of all public comments received during the Public Comment Period have been provided to the Commonwealth Department of Climate Change, Energy, the Environment and Water.	Not applicable
	a) a copy of all public comments;		
	b) a revised draft SIAR (if required) that takes into account the public comments received (if any);	The Draft Report was published for public comment for the period between 3 February 2025 and 17 March 2025. The Final Report will include amendments as outlined in Section 4, to respond to public submissions.	Section 4
	c) a revised draft Plan (if required) that is informed by public comments received on the draft SIAR (if any); and	A revised Draft Plan that is informed by public comments will be provided to the Commonwealth Department of Climate Change, Energy, the Environment and Water.	Not applicable
	d) a Supplementary SIAR which addresses how all public comments have been addressed through revisions to the draft SIAR or Plan (if required).	Section 4 provides a response to the key themes and comments raised within the public comments, and how they have been addressed through revisions to the Draft Report (where required).	Section 4

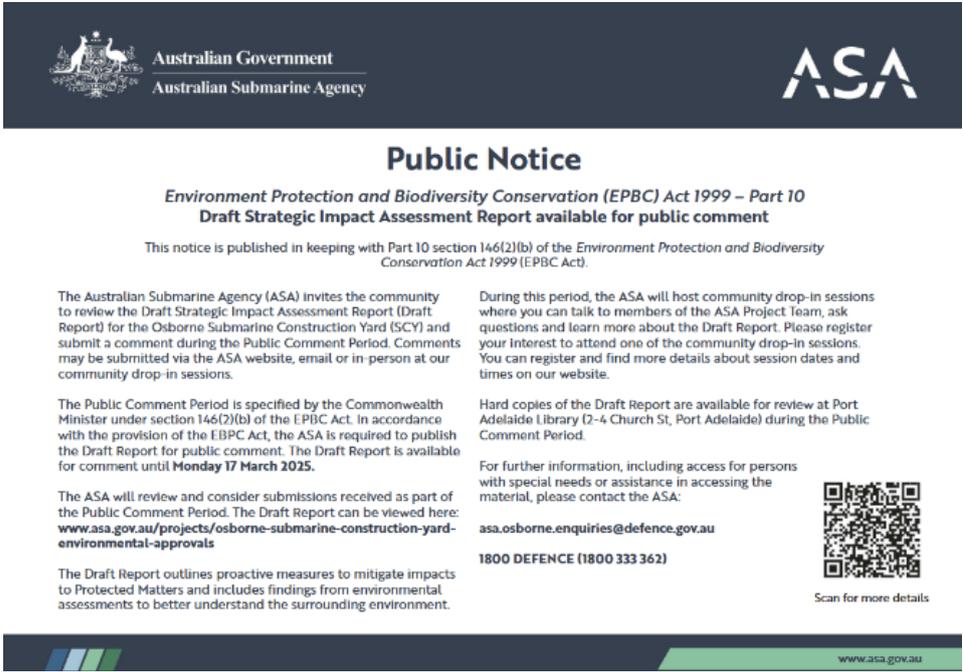
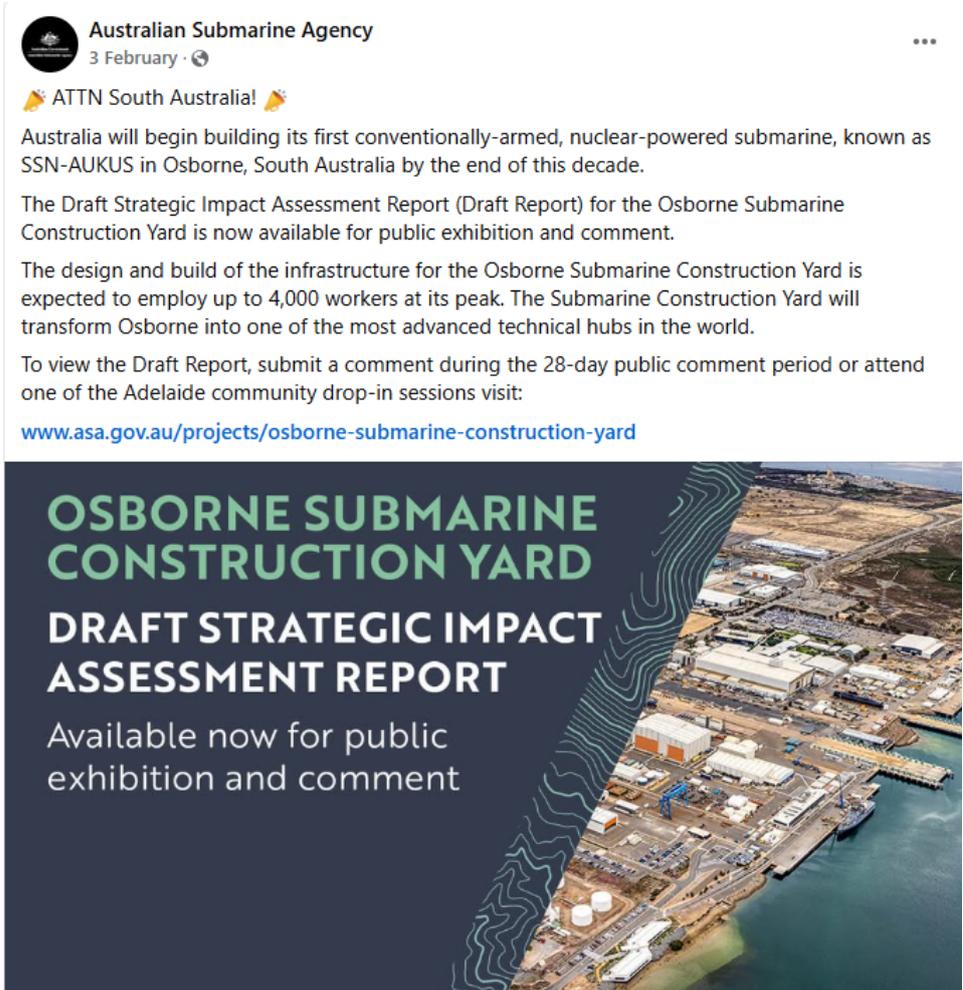


Appendix B

Public Comment Period artefacts

B-1 Public Comment Period notifications

The following artefacts were published during the Public Comment Period to notify the public.

Date and source	Evidence
<p>Adelaide Advertiser 3 February 2025</p>	 <p>The image shows a public notice from the Australian Government Australian Submarine Agency (ASA). The notice is titled "Public Notice" and is dated 3 February 2025. It is published in keeping with Part 10 section 146(2)(b) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The notice 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 community drop-in sessions. The notice also mentions that 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). The notice also includes a QR code and the website www.asa.gov.au.</p>
<p>Facebook 3 February 2025</p>	 <p>The image shows a Facebook post from the Australian Submarine Agency, dated 3 February 2025. The post is addressed to "ATTN South Australia!" and contains the following text: "Australia will begin building its first conventionally-armed, nuclear-powered submarine, known as SSN-AUKUS in Osborne, South Australia by the end of this decade. The Draft Strategic Impact Assessment Report (Draft Report) for the Osborne Submarine Construction Yard is now available for public exhibition and comment. The design and build of the infrastructure for the Osborne Submarine Construction Yard is expected to employ up to 4,000 workers at its peak. The Submarine Construction Yard will transform Osborne into one of the most advanced technical hubs in the world. To view the Draft Report, submit a comment during the 28-day public comment period or attend one of the Adelaide community drop-in sessions visit: www.asa.gov.au/projects/osborne-submarine-construction-yard". The post also includes a large image with the text "OSBORNE SUBMARINE CONSTRUCTION YARD DRAFT STRATEGIC IMPACT ASSESSMENT REPORT Available now for public exhibition and comment".</p>



Date and source	Evidence
<p>Facebook 3 March 2025</p>	<div data-bbox="459 226 1374 454">  <p>Australian Submarine Agency 3 March at 16:01 · 🌐</p> <p>👉 ATTN South Australia! 👉</p> <p>Australia will begin building its first conventionally-armed, nuclear-powered submarine, known as SSN-AUKUS in Osborne, South Australia by the end of this decade.</p> <p>The Draft Strategic Impact Assessment Report (Draft Report) for the Osborne Submarine Construction Yard is now available for public exhibition and comment. ... See more</p> </div> <div data-bbox="443 472 1401 1003">  </div>
<p>Twitter (X) 3 February 2025</p>	<div data-bbox="459 1039 1374 1205">  <p>Australian Submarine Agency @AustSubAgency · Feb 3</p> <p>Australia will begin building its first conventionally-armed, nuclear-powered submarine, SSN-AUKUS in Osborne, SA. Have your say on the Draft Strategic Impact Assessment Report for the Osborne Submarine Construction Yard available for public exhibition and comment now.</p> </div> <div data-bbox="539 1223 1378 1688">  </div> <div data-bbox="539 1711 1378 1749"> <p>🗨️ 1 🔄 4 ❤️ 10 📊 1K 📌 ⬆️</p> </div> <div data-bbox="459 1783 1374 1899">  <p>Australian Submarine Agency @AustSubAgency · Feb 3</p> <p>For more information visit: asa.gov.au/projects/osbor...</p> <p>🗨️ 🔄 ❤️ 4 📊 178 📌 ⬆️</p> </div>



Date and source	Evidence
<p>Twitter (X) 3 March 2025</p>	<p> Australian Submarine Agency @AustSubAgency · Mar 3</p> <p>Australia will begin building its first conventionally-armed, nuclear-powered submarine, known as SSN-AUKUS in Osborne, SA by the end of this decade.</p> <p>For more info, view the Draft Report or to make a submission, visit: asa.gov.au/projects/osbor...</p>  <p>   5  199  </p>



Date and source	Evidence
<p>LinkedIn 3 February 2025</p>	<div data-bbox="459 226 544 309"></div> <div data-bbox="555 226 928 262">Australian Submarine Agency</div> <div data-bbox="555 259 711 311"><p>12,784 followers 1mo • 🌐</p></div> <div data-bbox="1182 226 1374 255"><p>+ Follow ...</p></div> <div data-bbox="456 327 764 358"><p>🔔 ATTN South Australia! 🔔</p></div> <div data-bbox="450 396 1307 492"><p>Australia will begin building its first conventionally-armed, nuclear-powered submarine, known as SSN-AUKUS in Osborne, South Australia by the end of this decade.</p></div> <div data-bbox="450 530 1319 595"><p>The Draft Strategic Impact Assessment Report (Draft Report) for the Osborne Submarine Construction Yard is now available for public exhibition and comment.</p></div> <div data-bbox="450 631 1339 761"><p>The design and build of the infrastructure for the Osborne Submarine Construction Yard is expected to employ up to 4,000 workers at its peak. The Submarine Construction Yard will transform Osborne into one of the most advanced technical hubs in the world.</p></div> <div data-bbox="450 799 1382 866"><p>To view the Draft Report, submit a comment during the 28-day public comment period or attend one of the Adelaide community drop-in sessions visit:</p></div> <div data-bbox="450 900 730 934"><p>https://lnkd.in/eTnpzcCK</p></div> <div data-bbox="437 945 1399 1487"></div> <div data-bbox="453 1498 569 1529"><p>👍👎❤️ 161</p></div> <div data-bbox="1114 1498 1383 1529"><p>1 comment • 11 reposts</p></div>

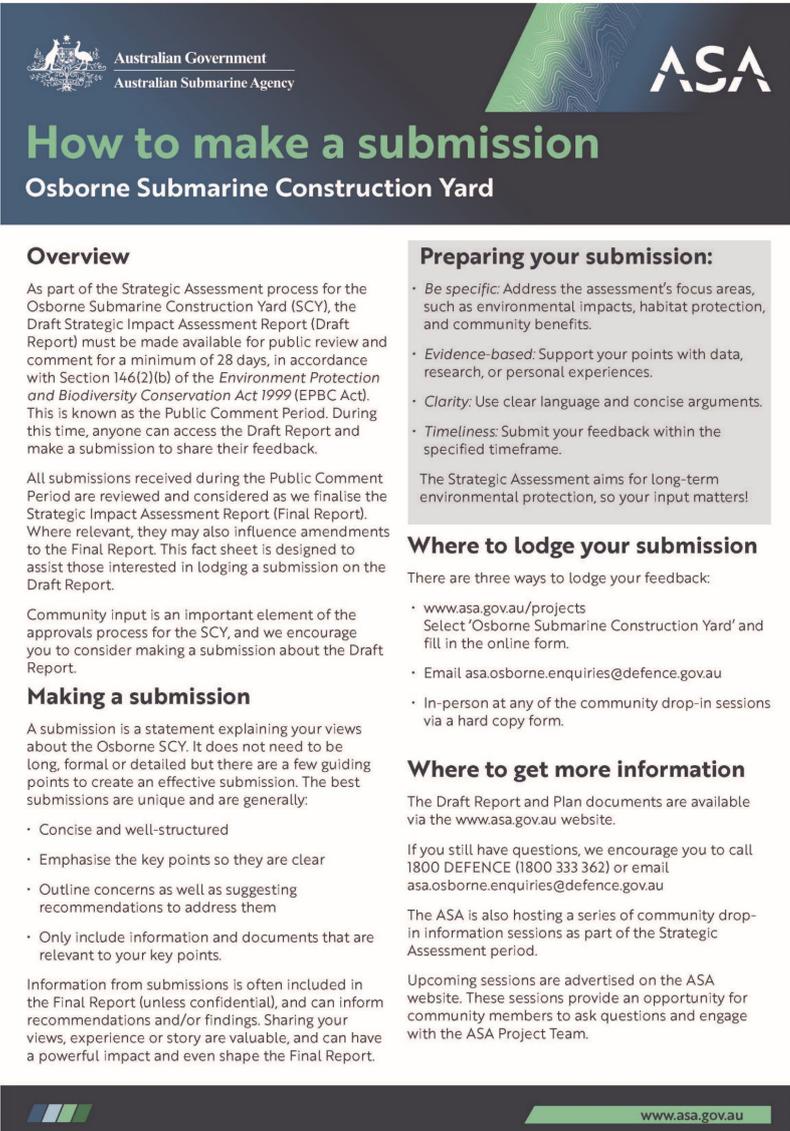


Date and source	Evidence
<p>LinkedIn 3 March 2025</p>	<div data-bbox="461 230 544 315"></div> <div data-bbox="555 230 927 315"><p>Australian Submarine Agency 12,784 followers 1w • 🌐</p></div> <div data-bbox="1187 230 1366 259"><p>+ Follow ...</p></div> <div data-bbox="461 331 762 360"><p>🔥 ATTN South Australia! 🔥</p></div> <div data-bbox="461 400 1295 495"><p>Australia will begin building its first conventionally-armed, nuclear-powered submarine, known as SSN-AUKUS in Osborne, South Australia by the end of this decade.</p></div> <div data-bbox="461 535 1310 595"><p>The Draft Strategic Impact Assessment Report (Draft Report) for the Osborne Submarine Construction Yard is now available for public exhibition and comment.</p></div> <div data-bbox="461 636 1187 696"><p>For more information, view the Draft Report or to make a submission, visit: https://lnkd.in/eTnpzcCK</p></div> <div data-bbox="440 712 1399 1249"></div> <div data-bbox="461 1261 560 1290"><p>👍👎🗨️ 92</p></div> <div data-bbox="1123 1261 1374 1290"><p>2 comments · 5 reposts</p></div>



B-2 Webpage collateral

The following factsheet was created to support the submission process during the Public Comment Period.

Description	Photo
<p>'How to make a submission' factsheet</p> <p>Purpose:</p> <ul style="list-style-type: none"> – A 1-page factsheet designed to provide the community with specific information on a particular subject matter. <p>Content overview:</p> <ul style="list-style-type: none"> – Details on how stakeholders could make a submission to provide feedback on the Draft Report – A brief overview of the Project and the importance of making a submission – Guidelines for preparing a submission – Information on where to lodge a submission. 	 <p>Overview</p> <p>As part of the Strategic Assessment process for the Osborne Submarine Construction Yard (SCY), the Draft Strategic Impact Assessment Report (Draft Report) must be made available for public review and comment for a minimum of 28 days, in accordance with Section 146(2)(b) of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). This is known as the Public Comment Period. During this time, anyone can access the Draft Report and make a submission to share their feedback.</p> <p>All submissions received during the Public Comment Period are reviewed and considered as we finalise the Strategic Impact Assessment Report (Final Report). Where relevant, they may also influence amendments to the Final Report. This fact sheet is designed to assist those interested in lodging a submission on the Draft Report.</p> <p>Community input is an important element of the approvals process for the SCY, and we encourage you to consider making a submission about the Draft Report.</p> <p>Making a submission</p> <p>A submission is a statement explaining your views about the Osborne SCY. It does not need to be long, formal or detailed but there are a few guiding points to create an effective submission. The best submissions are unique and are generally:</p> <ul style="list-style-type: none"> • Concise and well-structured • Emphasise the key points so they are clear • Outline concerns as well as suggesting recommendations to address them • Only include information and documents that are relevant to your key points. <p>Information from submissions is often included in the Final Report (unless confidential), and can inform recommendations and/or findings. Sharing your views, experience or story are valuable, and can have a powerful impact and even shape the Final Report.</p> <p>Preparing your submission:</p> <ul style="list-style-type: none"> • <i>Be specific:</i> Address the assessment's focus areas, such as environmental impacts, habitat protection, and community benefits. • <i>Evidence-based:</i> Support your points with data, research, or personal experiences. • <i>Clarity:</i> Use clear language and concise arguments. • <i>Timeliness:</i> Submit your feedback within the specified timeframe. <p>The Strategic Assessment aims for long-term environmental protection, so your input matters!</p> <p>Where to lodge your submission</p> <p>There are three ways to lodge your feedback:</p> <ul style="list-style-type: none"> • www.asa.gov.au/projects Select 'Osborne Submarine Construction Yard' and fill in the online form. • Email asa.osborne.enquiries@defence.gov.au • In-person at any of the community drop-in sessions via a hard copy form. <p>Where to get more information</p> <p>The Draft Report and Plan documents are available via the www.asa.gov.au website.</p> <p>If you still have questions, we encourage you to call 1800 DEFENCE (1800 333 362) or email asa.osborne.enquiries@defence.gov.au</p> <p>The ASA is also hosting a series of community drop-in information sessions as part of the Strategic Assessment period.</p> <p>Upcoming sessions are advertised on the ASA website. These sessions provide an opportunity for community members to ask questions and engage with the ASA Project Team.</p> <p>www.asa.gov.au</p>



Description	Photo
<p>Project Overview factsheet</p> <p>Purpose:</p> <ul style="list-style-type: none"> – A 2-page factsheet designed to provide the community with detailed information on a specific subject matter. <p>Content overview:</p> <ul style="list-style-type: none"> – An overview of the Project, including details about the Strategic Assessment Process and its components – Key milestones of the Strategic Assessment Process – Answers to commonly asked questions about the Project. 	 <p>The Australian Submarine Agency (ASA) is the single point of accountability for Australia's conventionally-armed, nuclear-powered submarine program.</p> <p>As part of the AUKUS trilateral agreement between Australia, the United Kingdom and the United States, the new submarine fleet, known as SSN-AUKUS, will be built in Adelaide, South Australia.</p> <p>The delivery of this capability will be a transformative and inter-generational program, for industry in South Australia, with the first Australian SSN-AUKUS build beginning before the end of this decade.</p> <p>The SSN-AUKUS construction will be supported by an expansion of the existing Osborne Naval Shipyard, to accommodate a new Submarine Construction Yard (SCY). The preferred site for the yard is located on the Lefevre Peninsula approximately 19km north of Adelaide.</p> <p>Over the next few years, it is estimated at least \$2 billion will be invested in South Australian infrastructure. At its peak – the design and build of the infrastructure for the OSCY is expected to employ up to 4,000 workers – almost double the workforce forecast for the Attack Class program.</p>  <p>Map of Strategic Assessment area.</p> <p>Strategic Assessment Process</p> <p>Under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act), the Project is required to undertake environmental assessments to understand potential impacts on protected matters related to the construction and operation of the SCY.</p> <p>The Strategic Assessment Agreement includes the development of:</p> <ul style="list-style-type: none"> • Terms of Reference (TOR) – describes the assessment requirements of the Strategic Impact Assessment Report (the Report). • Plan – describes the kinds of activities that will be undertaken as a part of the construction and operation of the SCY. • Report – assesses the impact of the activities against the assessment requirements described in the TOR. <p>The draft TOR was made available for public comment from 4 December 2023 to 28 January 2024. The finalised TOR is available on the ASA website: https://www.asa.gov.au/projects/osborne-submarineconstruction-yard-environmental-approvals</p> <p>ASA has prepared the Plan and Draft Report to detail the proposed construction and operation of the SCY and provide an assessment of the potential environmental impacts.</p> <p>The Draft Report is now available for public review and comment. During this time, there will be opportunities for the community and key stakeholders to learn more about the Project and ask questions.</p> <p>Feedback will be reviewed at the end of the comment period, and amendments made to the Report where relevant. The revised document will then be submitted to the Federal Minister for the Environment and Water, through the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for consideration.</p> <p>www.asa.gov.au</p>



Description	Photo
<p>Strategic Assessment Overview booklet</p> <p>Purpose:</p> <ul style="list-style-type: none"> – An 8-page booklet designed to provide the community with an overview of the Draft Report. <p>Content overview:</p> <ul style="list-style-type: none"> – An overview of the Draft Report – General information about the Project – A brief summary of the Strategic Assessment and the approvals process – An overview of what The Report examined, including details on the Strategic Area and environmental context – Included a call to action regarding the Draft Report. 	 <p>Looking north over the Lefevre Peninsula (Source: ANI)</p> <p>Introduction</p> <p>The Draft Strategic Impact Assessment Report (Draft Report), for the Osborne Submarine Construction Yard Project (Project), is now available for review and comment as a part of the Public Comment Period.</p> <p>The Draft Report was prepared as part of the Strategic Assessment process for the Project, which commenced in November 2023.</p> <p>This document provides an overview of the Strategic Assessment process conducted for the Project, and outlines:</p> <ul style="list-style-type: none"> • The Project background • The Strategic Assessment project approval process and other approvals required • The environmental context for the Strategic Assessment • Activities to be undertaken as part of construction and operation • Outcomes and commitments for Protected Matters • How you can review the Report and make a comment during the Public Comment Period. <p>www.asa.gov.au</p>



Description	Photo
<p>Biodiversity factsheet</p> <p>Purpose:</p> <ul style="list-style-type: none"> – A 2-page factsheet designed to provide the community with specific information on a particular subject. <p>Content overview:</p> <ul style="list-style-type: none"> – Specific details on what biodiversity is – Planned location of the Submarine Construction Yard – General overview of the Project – Information about the environment surrounding the Submarine Construction Yard – Biodiversity values in the region – Assessments undertaken for biodiversity – Included a call-to-action directing readers to the ASA webpage for more information. 	 <p>About the Project</p> <p>The Australian Submarine Agency (ASA) has entered into an agreement with the Minister for Environment and Water to undertake a Strategic Assessment under Part 10 of the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i>. This fact sheet explains the Biodiversity considerations to be included as part of the Strategic Assessment.</p> <p>Australia will begin building its first SSN-AUKUS in Osborne, South Australia by the end of this decade. Construction will be supported by an expansion of the existing Osborne Naval Shipyard Area to support the facilities and infrastructure required to build the first SSN-AUKUS, referred to as the Submarine Construction Yard (SCY).</p> <p>The preferred site for the SCY is situated north of the existing Osborne Naval Shipyard on the Lefevre Peninsula, approximately 19 km north of Adelaide in South Australia. Osborne will be the home of Australia's next generation submarine build and will become one of the most advanced technological hubs in the world.</p> <p>Over the next few years, it is estimated at least \$2 billion will be invested in South Australian infrastructure. At its peak, the design and build of the infrastructure for the Osborne Submarine Construction Yard is expected to employ up to 4,000 workers – almost double the workforce forecast for the Attack Class program.</p>  <p>Looking north over the Lefevre Peninsula (Source: Australian Naval Infrastructure).</p> <p>ASA is committed to the sustainable development of the SCY, through consideration of the biodiversity values of the Lefevre Peninsula and surrounds.</p> <p>Where is the SCY planned to be located?</p> <p>The preferred location for the SCY is on the Lefevre Peninsula next to the existing Osborne Naval Shipyard. This land was previously prepared for industrial development.</p> <p>What is biodiversity?</p> <p>Biodiversity refers to plants, animals and the habitats in which they live. Biodiversity values refer to the importance of having a variety of different plants, animals, and ecosystems.</p> <p>What is the environment like within the SCY?</p> <p>The SCY is predominately cleared land, except for patches of low shrubs present along constructed stormwater basins. Biodiversity surveys of the SCY have identified habitats for plants and animals including birds, reptiles and other species occur along the stormwater drains and the shoreline, particularly where these are connected to vegetation.</p> <p> www.asa.gov.au</p>



B-3 Information Session collateral

The following collateral items were used during the information sessions.

Description	Photo
<p>Project timeline</p> <p>Purpose:</p> <ul style="list-style-type: none"> – Made available for attendees to view at their leisure – Provided visual context of various aspects of the Project during the information sessions. <p>Content overview:</p> <ul style="list-style-type: none"> – A static display offered a visual overview of the Project timeline to date – The Project team used this display as a visual aid to provide additional information to stakeholders, particularly regarding the expected timeline, completed milestones, and future phases following the Public Comment Period. 	
<p>Project map</p> <p>Purpose:</p> <ul style="list-style-type: none"> – Made available for attendees to view at their leisure – Provided visual context of various aspects of the Project during the information sessions. <p>Content overview:</p> <ul style="list-style-type: none"> – A static display offered visual context of the Strategic Assessment Area. 	

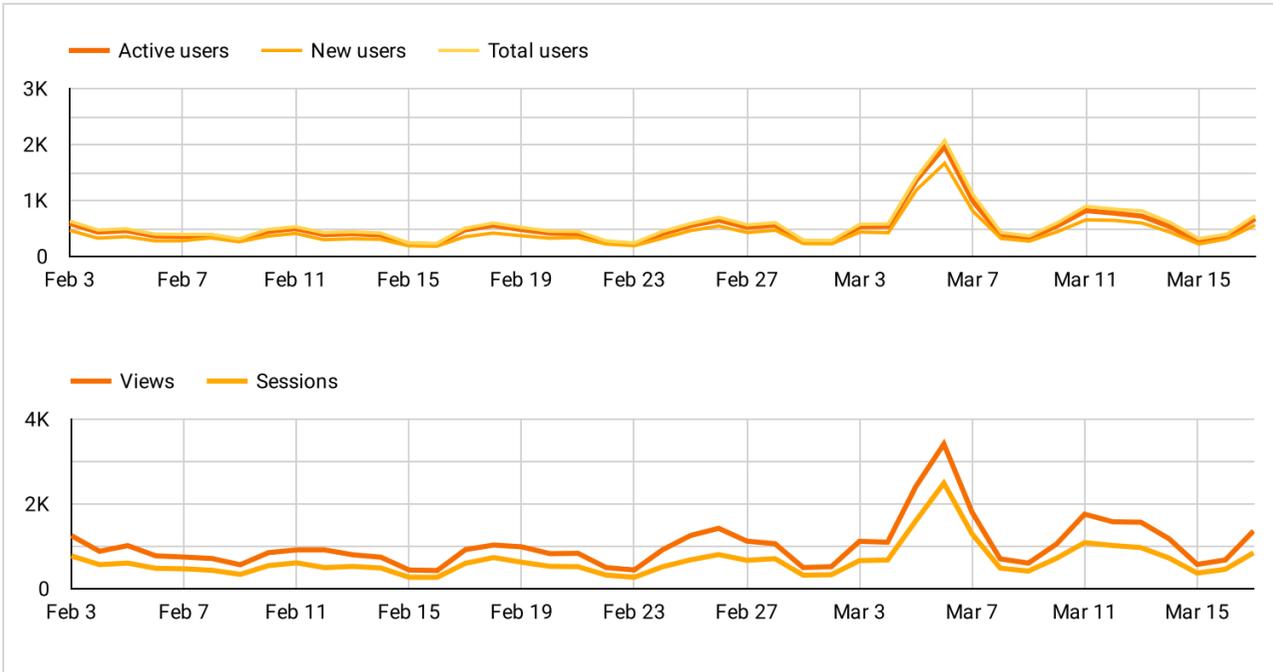


Appendix C

ASA webpage analytics



Audience



Active users
19,348



New users
18,260



Total users
19,526



Views
44,369



Sessions
28,253



Views per user
2.29



Average session duration
00:03:14

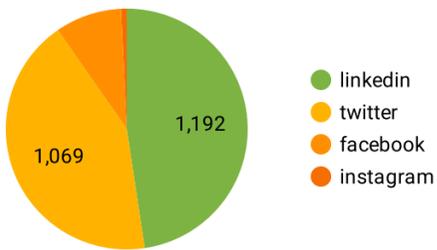


Engagement rate
57.80%



Channels and sources

Active users via social media



Channel	Active users	Sessions
1. Organic Search	11,946	17,131
2. Direct	3,910	5,589
3. Referral	2,161	3,093
4. Organic Social	1,795	2,291
5. Unassigned	40	46

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City breakdown

City	Active users	New users
1. Sydney	3,787	3,445
2. Adelaide	2,921	2,561
3. Melbourne	2,253	2,004
4. Perth	1,846	1,720
5. Canberra	1,075	911
6. Brisbane	953	876
7. (not set)	774	673
8. London	342	313
9. Ashburn	181	172
10. Hobart	132	104

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Country breakdown

Country	Active users	New users	Views	Engagement rate
1. Australia	14,465	13,528	35,262	59.35%
2. United States	1,717	1,664	3,072	49.82%
3. United Kingdom	1,039	970	2,125	55.68%
4. France	184	181	255	53.92%
5. Canada	168	160	243	61.08%
6. New Zealand	161	150	233	57.21%
7. India	152	150	271	54.36%
8. Japan	150	144	351	58.11%
9. Germany	104	99	171	41.04%
10. China	88	80	169	47.5%

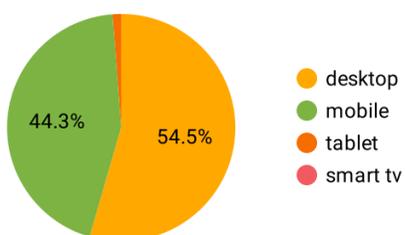
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Region breakdown

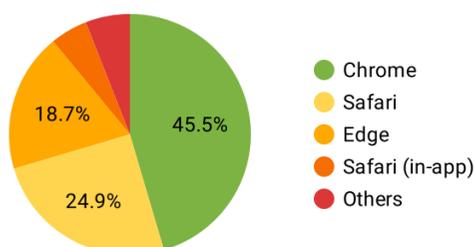
Region	Active users	New users
1. New South W...	4,654	4,232
2. South Austral...	3,148	2,787
3. Victoria	2,590	2,270
4. Western Aust...	2,040	1,920
5. Queensland	1,345	1,210
6. Australian Ca...	1,103	939
7. England	955	886
8. Virginia	380	359
9. (not set)	254	233
10. California	169	160

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What device are people using?



What browsers are people using?





Top downloads

	File	Downloads	Active users
1.	Download the strategy (Opens in a new tab/window)	1,630	1,459
2.	Proposed Osborne Submarine Construction Yard Strategic Assessment Agreement.pdf (PDF, 1.16 MB)	549	498
3.	EPBC Strategic Impact Assessment Report (PDF, 20.68 MB)	419	328
4.	Osborne Submarine Construction Yard - Project Overview (PDF, 630.77 KB)	373	331
5.	Australias AUKUS Submarine Industry Strategy - Factsheet.pdf (PDF, 3.73 MB)	338	322
6.	READ THE PUBLIC REPORT	233	212
7.	Osborne Submarine Construction Yard - Overview Booklet (PDF, 7.41 MB)	217	194
8.	Osborne Submarine Construction Yard - Terms of Reference (PDF, 195.23 KB)	169	154
9.	SSNAUKUS Factsheet (PDF, 1.37 MB)	163	153
10.	Variation Agreement (No.1) to Strategic Assessment Agreement (PDF, 645.22 KB)	162	145
11.	Nuclear Powered Capability Fact Sheet (PDF, 1.07 MB)	148	128
12.	Australian Submarine Agency Enterprise Agreement 2024-2027 (PDF, 1.36 MB)	147	138
13.	EPBC Strategic Impact Assessment Report - Appendices (PDF, 77.96 MB)	145	105
14.	Osborne Submarine Construction Yard - Webinar Presentation (PDF, 2.11 MB)	116	106
15.	SSNVirginiaClass Factsheet (PDF, 430.72 KB)	97	94
16.	SRFWest Factsheet (PDF, 381.67 KB)	91	84
17.	Nuclear Mindset Principles (PDF, 1.72 MB)	89	84
18.	CollinsClassLOTE Factsheet (PDF, 440.83 KB)	82	78
19.	SouthAustralia Factsheet (PDF, 347.66 KB)	81	78
20.	Agreement among the Governments of Australia UK and US for cooperation related to naval nuclear prop	77	69

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Top links to external websites

	Link URL	Clicks	Active users
1.	https://defencecareers.nga.net.au/?AudienceTypeCode=asaext	2,444	1,771
2.	https://www.pm.gov.au/media/joint-leaders-statement-aukus	289	275
3.	https://defencecareers.nga.net.au/cp/index.cfm?event=jobs.jati&returnToEvent=jobs.home&jobID=3BB50E6	225	178
4.	https://www.defence.gov.au/about/locations-property/infrastructure-projects/submarine-rotational-for	148	137
5.	https://navy.defencejobs.gov.au/submariners/nuclear	147	130
6.	https://www.whitehouse.gov/briefing-room/statements-releases/2023/03/13/fact-sheet-trilateral-austra	126	117
7.	https://www.defence.gov.au/jobs-careers/graduate-program	119	107
8.	https://www.minister.defence.gov.au/all-releases?keywords=nuclear-powered%20submarine	80	66
9.	https://www.defence.gov.au/jobs-careers/student-pathways/stem-cadetship	73	71
10.	http://defence.gov.au/	71	71
11.	https://gateway.icn.org.au/projects/5284	64	51
12.	https://forms.office.com/r/crFVgAw1p5	59	45
13.	https://www.asc.com.au/aukus/	57	47
14.	https://gateway.icn.org.au/project/5284/aukus-pillar-1-industry-portal	54	45
15.	https://www.dcceew.gov.au/environment/epbc/publications/strategic-assessment-under-epbc-act-brochure	45	41
16.	https://www.defence.gov.au/about/strategic-planning/2024-naval-shipbuilding-sustainment-plan	44	41
17.	https://www.defence.gov.au/about/strategic-planning/defence-industry-development-strategy	41	37
18.	https://yoursay.sa.gov.au/submarine-construction-yard-eis	41	39
19.	https://www.aph.gov.au/Parliamentary_Business/Tabled_Documents/6967	33	28
20.	https://www.trybooking.com/CVSZN	24	22

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Top pages

	Page title	Active users	Views	Engagement time	Engagement rate
1.	Homepage Australian Submarine Agency	3,472	4,898	25.07	75.33%
2.	Australia's AUKUS Submarine Industry Strategy Australian Submarine Agency	3,439	4,628	19.32	52.04%
3.	Osborne Submarine Construction Yard Australian Submarine Agency	2,165	3,515	54.3	61.63%
4.	Jobs and careers Australian Submarine Agency	2,385	3,497	15.73	69.24%
5.	AUKUS Australian Submarine Agency	2,552	3,309	18.66	66.29%
6.	Australia's nuclear-powered submarines Australian Submarine Agency	1,997	2,407	41.67	61.63%
7.	Nuclear Graduate Program Australian Submarine Agency	1,563	2,130	12.61	68.11%
8.	Working with us Australian Submarine Agency	1,002	1,627	26.18	91.54%
9.	AUKUS agreement for cooperation on naval nuclear propulsion Australian Submarine Agency	978	1,283	41.58	61.46%
10.	Nuclear Graduate Program Pathways Australian Submarine Agency	817	1,171	40.63	88.52%
11.	Leadership Australian Submarine Agency	762	1,035	44.45	78.85%
12.	How to apply Australian Submarine Agency	632	917	23.61	88.31%
13.	Construction in South Australia Australian Submarine Agency	654	789	32.33	68.94%
14.	Submarine Rotational Force - West Australian Submarine Agency	591	733	29.78	58.64%
15.	Optimal Pathway Australian Submarine Agency	516	724	44.19	70.27%
16.	All news Australian Submarine Agency	353	656	37.94	87.97%
17.	Eligibility requirements Australian Submarine Agency	486	649	26.52	91.34%
18.	What we offer Australian Submarine Agency	481	640	29.86	94.57%
19.	News Australian Submarine Agency	386	546	7.49	94.58%
20.	Search Australian Submarine Agency	167	436	29.75	89.45%
21.	Collins Class submarines Australian Submarine Agency	344	419	26.01	76.68%
22.	Submarines in Western Australia Australian Submarine Agency	343	399	31.03	70%
23.	Submarine Rotational Force – West Infrastructure Project Australian Submarine Agency	335	383	30.8	81.5%
24.	Application process Australian Submarine Agency	261	380	55.91	85.31%
25.	Industry and workforce Australian Submarine Agency	269	344	41.24	79.04%
26.	Business and industry Australian Submarine Agency	242	329	20.47	71.08%
27.	Submarine Tendered Maintenance Period Australian Submarine Agency	241	301	32.65	92.13%
28.	Build Australian Submarine Agency	252	292	36.72	82.19%
29.	Major milestone for South Australia's Skills and Training Academy Australian Submarine Agency	211	284	41.57	61.11%
30.	Public invited to comment on Osborne Submarine Construction Yard strategic assessment Australian Submarine Agency	213	282	45.94	77.46%
31.	About Australian Submarine Agency	242	277	17.09	90.57%
32.	Contacts Australian Submarine Agency	218	276	22.44	83.67%
33.	Virginia class submarine moors in Australia for the first US submarine visit of 2025 Australian Submarine Agency	220	261	27.98	61.42%
34.	Nuclear stewardship and waste Australian Submarine Agency	187	249	27.67	69.74%
35.	Supporting Australian industry to join AUKUS submarine supply chains Australian Submarine Agency	143	245	33.91	51.26%
36.	Nuclear non-proliferation Australian Submarine Agency	190	241	22.17	63.52%
37.	Engagement Australian Submarine Agency	172	232	30.97	79.08%
38.	Fear of sharks shelved in the line of duty Australian Submarine Agency	199	227	75.38	66.81%
39.	Planning and reporting Australian Submarine Agency	165	212	24.39	83.18%
40.	Access denied Australian Submarine Agency	113	199	10.72	77.24%
41.	Submarine industry and workforce Australian Submarine Agency	160	198	31.06	82.81%
42.	Freedom of information Australian Submarine Agency	87	169	40.48	85.71%
43.	Sustainment Australian Submarine Agency	140	167	28.99	75.44%
44.	Australian Submarine Supplier Qualification Pilot Program supporting local business Australian Submarine Agency	135	164	33.94	49.72%
45.	Industry Security Program Australian Submarine Agency	98	126	26.83	89.83%
46.	Preparing for the build of Australia's nuclear-powered submarines in South Australia Australian Submarine Agency	103	120	38.95	66.67%
47.	81 Apprentices and Graduates Join Australia's Submarine Workforce Australian Submarine Agency	105	116	42.85	80%
48.	WA Quarterly Update December 2024 Australian Submarine Agency	91	114	17.15	92%
49.	New Defence precinct at Henderson to deliver continuous Naval shipbuilding and nuclear-powered submarine maintenance...	92	108	24.92	52.14%
50.	Building Strength: Australia's Two Years on the Optimal Pathway Australian Submarine Agency	80	95	39.58	69.57%

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