

To: Department of Climate Change, Energy, the Environment and Water

16 July 2025

## **2025 Victorian Renewable Energy Terminal (VRET) at the Port of Hastings**

Thank you for the opportunity to provide feedback on the Port of Hastings proposal to develop the VRET offshore wind terminal at Western Port.

This revised Environment Protection and Biodiversity Conservation (EPBC) Act referral leaves unanswered questions regarding the choice of Western Port as the site for the VRET, and underscores the need for a proper plan for the future of this internationally important wetland.

### **About Environment Victoria**

Environment Victoria is the leading not-for-profit environmental advocacy organisation in Victoria. With 96 grassroots member groups and over 200,000 individual supporters, we've been representing Victorian communities on environmental matters for over 55 years. Through advocacy, education and empowerment, Environment Victoria seeks significant and enduring solutions that will safeguard the environment and future wellbeing of all Victorians.

### **Introduction**

Western Port is the only wetland in Victoria that is recognised by the United Nations as a Biosphere Reserve and the International Ramsar Convention for wetland conservation. For decades, local community and environment groups have been fighting to protect Western Port from harmful development.

Western Port is also an economically important area with many competing uses. For many ports worldwide there exists tension between nature conservation and economic activity. In recognition of this, the industry association the World Association for Waterborne Transport Infrastructure (PIANC) calls for port designers to put nature first. PIANC advocates for a shift from technology-led to nature-led design such that planning considers the ecological carrying capacities of a port area and works back from there when accommodating multiple uses.<sup>1</sup> This is an internationally recognised approach to best practice and appropriate for the Port of Hastings in Western Port.

The successful development of an offshore wind industry is crucial for Victoria. Offshore wind is required for Victoria to meet its legislated renewable energy targets and so that the state's dirty, unreliable brown coal power plants can close on schedule. This will require an offshore wind terminal to be built, and this must be achieved while managing impacts on the environment.

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<sup>1</sup> 'Working with Nature', *Pianc* (blog), accessed 9 December 2024, <https://www.pianc.org/working-with-nature/>.

## **Pressures on Western Port in the context of the VRET proposal**

The EPBC referral process invites feedback from the public regarding whether the project is a controlled action, and requires the Minister for the Environment and Water to decide if a project needs assessment and approval under the EPBC Act. In considering this referral, we urge the Department and Minister to consider the following context.

The VRET is a Victorian government initiative at a Victoria-owned port. While developing this project, the Victorian government is engaged in other work that will affect the cumulative impacts on Western Port, including:

- The *Offshore Wind Energy Implementation Statement 4* notes that “Other commercial ports in Victoria have the potential to support and facilitate the establishment and operation of the offshore wind industry.”<sup>2</sup> However, it has not been made clear how an alternative port strategy might reduce overall environmental impacts, or if this has been considered. Given that good siting is the first step in the hierarchy of avoiding environmental impacts, the choice of port requires comparison and justification in relation to impacts on nature.
- The *Economic Growth Statement* flags rezoning of the large, nearby Hastings Special Use Zone to industrial use.<sup>3</sup> This, along with continued urban sprawl around Pakenham, will add cumulative impacts to Western Port.
- The referral does not plan for decommissioning, and notes that a port asset of the scale and nature of the VRET is likely to be repurposed and upgraded beyond its design life of 50 years. We are concerned the proposal leaves the door open to future unsustainable uses and puts future asset value over the environment.

These issues of context are all outside the scope of the referral. However, the Victorian government has control over all of them, as it does over the VRET, and they will all affect the ongoing ecological health of Western Port.

## **There is a feasible pathway to better planning and management of Western Port**

The Victorian government could implement an appropriate planning and management framework to balance the natural values of Western Port with economic activity in the region. We ask that the Minister for the Environment and Water recommend actions that the Victorian government could take to better manage Western Port into the future. To this end, we argue that the Victorian government could most effectively respond to many concerns regarding the VRET by implementing the Western Port Strategic Framework.

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<sup>2</sup> Victorian Government, ‘Offshore Wind Energy Implementation Statement 4’, April 2025, [https://www.energy.vic.gov.au/\\_\\_data/assets/pdf\\_file/0026/745235/Offshore-Wind-Energy-Victoria-Implementation-Statement-4.pdf](https://www.energy.vic.gov.au/__data/assets/pdf_file/0026/745235/Offshore-Wind-Energy-Victoria-Implementation-Statement-4.pdf).

<sup>3</sup> Victorian Government, ‘Victoria: Open for Business. Economic Growth Statement’, 2024, <https://www.vic.gov.au/sites/default/files/2024-12/Economic-Growth-Statement.pdf>.

## **Western Port Strategic Framework**

The Western Port Strategic Framework is a proposal to plan and manage Western Port developed by the Western Port Biosphere Reserve Foundation, Save Westernport, Phillip Island Conservation Society and the Victorian National Parks Association.<sup>4</sup> It already has broad stakeholder support. The Framework comprises three pillars:

- A new strategic plan for Western Port bringing together objectives, actions and programs into a coordinated planning and management tool recognising the natural values of Western Port and the future economic prosperity of the region.
- A new collaborative management partnership bringing together Traditional Owners, community representatives, government agencies, council, local business and industries, fishing and recreation groups to develop the plan and oversee implementation.
- A dedicated and ongoing Western Port fund of around \$2 million to deliver a marine spatial plan (as provided for in the Marine and Coastal Act) plus significant ongoing funding to deliver measures identified via the Framework - at least equivalent to the Port Phillip Bay Fund, which in 2016 received \$10 million over four years.

The Framework should guide all future development in Western Port and identify nature-positive measures that can achieve a measurable net gain in the ecological health of the area, to the benefit of all users and stakeholders. In terms of the VRET, the Framework could be used to identify remediation and improvements that go further than offsets.

The Victorian government could implement the Framework relatively quickly and with a relatively small investment in relation to the cost of building the VRET. The foundations have already been laid via the Marine and Coastal Act and the Marine and Coastal Policy and Guidelines which are in place. The survey data that has already been collected by the Port of Hastings for the VRET can significantly contribute to marine spatial planning. The Victorian National Parks Association estimates the cost of implementing a marine spatial plan at less than \$2 million.

We previously wrote to the Minister's predecessor, as well as a number of Victorian ministers, advocating for the implementation of the Western Port Framework and its inclusion in the present referral. This was not adopted despite its feasibility, support among diverse stakeholders, and potential to strengthen the referral.

### **Comments on the referral**

The Department and Minister should take into account two key omissions in this referral, as we have outlined in this submission. Firstly, that the Port of Hastings site has not been fully justified against other port options with regard to Matters of National Environmental Significance (MNES). Secondly that the Victorian government has not committed to implementing the Western Port Strategic Framework incorporating a marine spatial plan – as a result, it has not taken all reasonable steps to understand and manage risks, nor identify remedial measures.

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<sup>4</sup> Victorian National Parks Association, 'A Strategic Framework for the Future of Western Port Bay', n.d., [https://static1.squarespace.com/static/6316d18656da295118fc29ca/t/63452ad6abc9671ab2957fa6/1665477342811/stratframe\\_VNPA\\_1110.pdf](https://static1.squarespace.com/static/6316d18656da295118fc29ca/t/63452ad6abc9671ab2957fa6/1665477342811/stratframe_VNPA_1110.pdf).

If the Department and Minister ultimately conclude that the VRET has been sufficiently assessed as per the EPBC Act to justify progress to the next stage as a controlled action, we would like to see the proponents manage residual significant impacts on MNES at the scale of Western Port in its entirety through the Western Port Strategic Framework.

We note that the Victorian government has already consulted on the scoping requirements for the Environment Effects Statement (EES). If the VRET progresses, the public should be given another opportunity to provide input on the updated EES scoping. There exists a wealth of local and traditional knowledge of Western Port that can positively influence the project.

We would be pleased to discuss any aspects of this submission in more detail should you wish.

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