

To: Department of Transport and Planning

24 September 2025

**Victorian Renewable Energy Terminal (VRET) - Updated Environment Effects Statement (EES) Draft Scoping Requirements (2023-RO6)**

We appreciate the opportunity to comment on the updated EES Draft Scoping requirements for the VRET proposed for the Port of Hastings.

**About Environment Victoria**

Environment Victoria is the leading not-for-profit environmental advocacy organisation in Victoria. With 40 grassroots member groups and over 200,000 individual supporters, we've been representing Victorian communities on environmental matters for over 50 years. Through advocacy, education and empowerment, Environment Victoria seeks significant and enduring solutions that will safeguard the environment and future wellbeing of all Victorians.

Through our Safe Climate campaign we advocate for a fast and fair transition to clean energy. Rapid and deep cuts to greenhouse gas emissions this decade by displacing fossil fuel generation with renewable energy will save lives, livelihoods, species and ecosystems.

We see offshore wind as an essential part of Victoria's future energy system. As Victoria leads Australia in developing offshore wind it is crucial that the Victorian government earns and maintains community trust in environmental assessment, protection and management as it relates to the VRET and offshore wind.

**Introduction**

Our previous submission

In our submission to the initial EES Draft Scoping Requirements we highlighted the very high ecological value of Western Port and the ongoing pressures from encroaching development.

Communities around Western Port and the area's Traditional Custodians value the bay deeply and possess a wealth of knowledge about the local environment. Local groups have a history of successfully resisting inappropriate development and we know that they are paying close attention to the EES process. It is absolutely essential that the Victorian government and the Port of Hastings get this right by prioritising rigour, trust and transparency.

Our submissions on this matter have provided clear actions that the government and the Port should take, namely:

1. Implement the Western Port Framework, a strategic framework which has broad community and industry support
2. Green-light a marine spatial plan for Western Port under the Marine and Coastal Act
3. Use the best available scientific knowledge, including the full range of government experts and collaborating with local knowledge-holders
4. Build trust through real engagement and transparency

#### The Victorian government holds all the levers

The VRET is not the only pressure on Western Port. The industrial rezoning of the Special Use Zone in Hastings foreshadowed in the Victorian government's Economic Growth Statement, as well as urban expansion in the Pakenham and Cranbourne areas, place the area under growing and cumulative pressures. The northern estuaries of Western Port, where industry and agriculture is most intensive, already have the the highest counts of contaminants of all areas of Port Phillip and Western Port Bays.<sup>1</sup>

These current and future pressures on Western Port are directly attributable to actions and decisions of the Victorian government. **The Victorian government has a responsibility to proactively care for Western Port.** The measures listed above are in line with recent reforms of the Marine and Coastal Act, are consistent with existing measures such as the Port Phillip Bay Fund (which has recently been allocated a new funding round of \$2.16 million) and are not costly relative to the cost of building the VRET.<sup>2</sup>

#### **Feedback on the updated Draft EES Scoping Requirements**

In general the project has not changed substantially since the last iteration. There is little indication of a shift from a minimum-compliance approach towards proactive and nature-led management as is warranted for an area of such high ecological value.

#### Land reclamation and dredging

We welcome the reduction in land reclamation area, and disclosure of the volume of dredging. However, the sheer scale of dredging is unprecedented since Western Port's Ramsar Convention listing over 40 years ago. The Port of Hastings and the government are yet to have provided sufficient justification of the choice of site or the design of the site with regard to environmental impacts.

The EES should include:

- Comparison of the environmental impacts of alternative sites. This should cover different VRET activities, scheduling (time of day and time of year), and other ports, including single and multiple port strategies.

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<sup>1</sup> J Myers et al., *Exploring Unseen Threats: Contaminant Trends and Impacts in Port Phillip Bay, Round One Results Summary Report*, Technical report no. 135 (Aquatic Environmental Stress Research Group, RMIT University, n.d.).

<sup>2</sup> 'Protecting The Life Of Port Phillip Bay Through Grants', accessed 22 September 2025, <https://www.premier.vic.gov.au/protecting-life-port-phillip-bay-through-grants>.

- Comparison of the environmental impacts of alternative VRET designs at the Port of Hastings. This should consider designs that lessen the extents and impacts of dredging and land reclamation.

Dredging is an activity with a high risk of environmental impacts and which will attract a high degree of community attention and concern. In the case of the Port Phillip Bay Channel Deepening Project, the government of the day established the Office of the Environmental Monitor to monitor compliance with the project's environmental management plan. The monitor also provided a crucial role in cultivating public trust, providing a point of contact for third parties to report concerns, following up on those concerns, and communicating outcomes publicly. (We use dredging as an example, but is not the only activity requiring attention.)

The EES should include:

- A comprehensive Environmental Management Framework spanning design, construction, operation and decommissioning
- A commitment to establish an independent body to monitor compliance and conduct two-way communications with the public.

#### Climate impacts

We note that the revised EES Scoping documents include accounting of project greenhouse gas emissions, emissions from loss of vegetation and the project's significant contribution to meeting Victoria's Renewable Energy Targets. This is welcome, and we expect this to include all greenhouse gas emissions directly associated with the project including (but not limited to) construction, operation, and the potential release of sequestered carbon from disturbance to blue carbon habitats including seagrasses, saltmarshes and mangroves. The EES can draw on existing research and mapping conducted by the Blue Carbon Lab at Deakin University for this purpose.

The EES should include:

- Explicit accounting for changes in blue carbon
- Full accounting of greenhouse gas emissions directly arising from all phases of the project.

The EES Scoping documents make mention of the risks associated with climate change, however they do not provide detail. As a coastal area, sea level rise and storm surges are of material import. There are datasets available such as the recent National Climate Risk Assessment and Western Port Local Coastal Hazard Assessment.

The EES should include:

- Risks and impacts of climate change-related hazards such as sea level rise

#### Public consultation and use of expertise

Due to the complex nature of the project and the potential for impacts, we expect that the package of documents comprising the VRET EES will be very substantial. Furthermore, we expect the level of public interest and engagement to be very high. Community groups, members of the public, local councils and subject matter experts will require a reasonable amount of time to read, digest and discuss the documents. In many cases these groups will be relying on volunteer labour during limited spare time.

There is a significant base of local knowledge of Western Port among Traditional Owners, conservation groups, fishing and tourism groups, and others. This has the potential to make the EES stronger. The Port of Hastings has been engaging with some of these groups, which is welcome, however it is important that these processes are public (noting this is not always appropriate in the case of cultural knowledge) and accountable.

We request that:

- Consultation timeframes are extended beyond the minimum required, commensurate with the scale of the EES.
- A public inquiry is convened to ensure project transparency and accountability to local knowledge-holders and to facilitate genuine public engagement.

The cost of accessing expertise to support engagement in EES public consultation can be very high. Often this can unfairly advantage the proponent and result in poorer quality analysis and advice. Rather than putting the onus on the community, non-government organisations and local councils to pay for expertise, the government needs to ensure that the project is advised using the best available expertise, including government experts such as the Marine and Coastal Council, the Arthur Rylah Institute and the Commissioner for Environmental Sustainability.

We request that:

- The Victorian government invites the Marine and Coastal Council, the Arthur Rylah Institute, the Commissioner for Environmental Sustainability and other relevant experts to review and provide advice to the EES process.

#### Other issues

We support attention to the following issues:

- A commitment to net biodiversity gain (beyond offsets) with detail on how this will be achieved in an effective and ongoing manner
- Early commencement of biodiversity gain activities, to allow for learning and mitigate impacts
- A plan for decommissioning the VRET and detail regarding future uses of the area post-VRET
- Issues raised in the expert review conducted by Australian Marine Ecology for the Victorian National Parks Association.

You are welcome to contact me on the details below, should you wish to discuss this submission in more detail.

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