

Renewable Hydrogen Unit
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DEPARTMENT OF JOBS, TOURISM, SCIENCE AND INNOVATION – CONSULTATION PAPER – WESTERN AUSTRALIA RENEWABLE HYDROGEN STRATEGY REFRESH

Thank you for the opportunity to make a submission on the Western Australia (WA) refreshed Renewable Hydrogen Strategy (the Strategy).

The Environmental Protection Authority (EPA) is an independent statutory body with responsibility to use its best endeavours to protect the environment. A focus of the EPA's Strategic Plan 2023-2026 is to publish strategic advice and guidance on emerging industries (such as hydrogen, critical minerals and renewable energy projects) to enable the environmental benefits of these industries to be realised in a way that is consistent with the EPA objectives. To this end, the EPA support's decarbonisation projects to reduce greenhouse gas emissions as far as possible, and the refresh of the Strategy to assist in protecting WA's environment.

The Strategy identifies a number of challenges and activities for government, particularly as it relates to the production and export pillars, including approval timeframes, activation of strategic industrial areas or hubs, and common use infrastructure and corridors. However, the Strategy provides limited focus on ensuring good environmental outcomes and how government can facilitate this. The EPA considers that emissions reduction goals should occur in conjunction with regional environmental protection frameworks, which is of key strategic interest to the EPA.

The EPA notes the Strategy identifies the formation of dedicated teams across government to assist in green energy projects' planning and approvals. While the EPA supports these initiatives, early and upfront consideration of potential environmental impacts, including the application of the mitigation hierarchy (avoid, minimise and rehabilitate) avoidance measures, is likely to have a far greater impact on reducing approval timeframes while ensuring WA's environment is protected.

Environmentally, challenges for future renewable hydrogen proposals include cumulative impacts and fragmentation to significant environmental values, potential impacts to Aboriginal cultural heritage, water supply for hydrogen production, and ensuring waste avoidance, reuse and recycling, both during and at end of project life. Fragmentation and cumulative impacts to environmental values, including areas of high conservation and social values, are key matters and the EPA expects proponents

to apply the mitigation hierarchy to the fullest extent possible for each proposal and environmental aspect, and for the entire lifecycle of the proposal.

In this context, early consideration of potential environmental impacts and associated upfront works and advanced planning are likely to provide confidence around approval pathways and timeframes. Relevant actions for government may include upfront surveys of strategic industrial areas for environmental and social values to allow cumulative and holistic impact assessment to occur early and ensure the EPA objectives are met. There should also be due consideration to waste management and recycling of solar panels and other associated renewable energy infrastructure as part of a circular waste economy.

Sufficient upfront information provides the EPA with confidence regarding environmental outcomes while supporting staging project construction and providing flexibility for detailed project footprints and layouts.

The EPA also supports co-locating and planning for common use infrastructure and corridors. Multiple and proponent-specific infrastructure and infrastructure corridors will increase fragmentation and cumulative impacts to a range of environmental values. Hydrogen production particularly, with its high-water requirements, would benefit from early and upfront consideration of infrastructure such as desalination plants to reduce pressure on local water supplies and impacts to the marine environment resulting from brine discharge.

The inclusion of the 'enabling development' pillar, the empowering of Aboriginal peoples and ensuring cultural heritage protection is also supported by the EPA as well as ensuring best practice environmental, social and governance standards are followed.

The EPA recently provided a submission supporting the introduction of diversification leases on Crown land and considers that they have the potential to support the development of projects that can meet the EPA objectives for the protection of WA's environment. The EPA reiterates its support for measures and government action that will assist in supporting decarbonisation while ensuring the WA environment is protected.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Matthew Tonts', with a stylized flourish at the end.

Prof. Matthew Tonts
CHAIR, ENVIRONMENTAL PROTECTION AUTHORITY

16 October 2023