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Subject: New submission from EIS Submission
Attachments: culture-statement-for-widfarm.docx; STAR-OF-THE-SOUTH-submission.docx; southern-star-doc-1.docx

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Yes

Please provide the full name of the person and/or an organisation you are submitting on behalf of

Kurnai Native Title Holders

Your Details

Name

Pauline Mullett

Address

[REDACTED]

Email

[REDACTED]

Confirm Email Address

[REDACTED]

Phone Number

[REDACTED]

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- [culture-statement-for-widfarm.docx](#)
- [STAR-OF-THE-SOUTH-submission.docx](#)
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Submission Declaration



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STAR OF THE SOUTH – FULL SUBMISSION

Submitted to: Commonwealth Environmental Impact Statement (EIS)

Victorian Environment Effects Statement (EES)

Submitted by: Pauline Mullett

Kurnai Native Title Holder

Date: 30-6-2026

1. Introduction

I am a Kurnai Native Title Holder with cultural responsibilities for Country, waterways, Sea Country, and cultural heritage places affected by the Star of the South offshore wind project.

This submission is made in my capacity as:

- a) a determined native title holder,
- b) a holder of traditional and cultural responsibilities, and
- c) a person directly affected by the project's impacts on Country, culture, and spiritual connection.

The project area intersects with areas of cultural significance, ancestral pathways, and Sea Country responsibilities that are central to Kurnai identity, law, and custom.

2. Failure to Consult Native Title Holders

The EIS/EES processes rely heavily on engagement with funded organisations, but native title holders themselves have not been properly consulted.

Key issues include:

- a) Consultation has been directed to corporate entities, not the actual native title holders who hold authority.
- b) The State and the proponent have not identified or consulted the correct Kurnai family's groups.
- c) Cultural authority sits with Elders and lineage-based families, not with administrative bodies.

This is inconsistent with:

1. Native Title Act 1993 (Cth)
2. EPBC Act 1999 (Cth)
3. Environment Effects Act 1978 (Vic)
4. UNDRIP Articles 11, 18, 19, 25, 31 & 32

This failure constitutes a procedural fairness breach and undermines the legitimacy of the assessment process.

3. Cultural Heritage Impacts

The project affects:

- a) to Sea Country
- b) to Songlines and spiritual pathways
- c) the Ancestral places beneath the water
- d) our Cultural landscapes connected to the Tatungoloong, Bratowoloong, Brayakoloong, Brabuwooloong & Krowathunkooloong, Five clans
- c) Marine species of cultural significance

The EIS/EES does not adequately assess:

- a) underwater cultural heritage
- b) intangible cultural values
- c) spiritual responsibilities
- d) cumulative cultural impacts
- e) intergenerational cultural loss

These omissions are significant and require correction.

4. Spiritual Loss and Cultural Harm

For Kurnai people, Sea Country is a living cultural and spiritual landscape. It holds:

1. Ancestors
2. Creation stories
3. Songlines
4. Ceremonial pathways
5. Cultural identity

Industrialisation of Sea Country will cause:

- a) spiritual loss
- b) disruption of cultural responsibilities
- c) interference with Songlines
- d) loss of connection to Ancestors
- e) cultural grief and harm

These impacts cannot be measured by Western science but are real, significant, and permanent.

The EIS/EES does not recognise or assess these impacts.

5. Native Title Rights and Interests

The project area intersects with Kurnai native title rights and cultural responsibilities.

The EIS/EES does not address:

- a) how native title rights will be protected
- b) how cultural responsibilities will be maintained
- c) whether the project constitutes a future act
- d) whether free, prior and informed consent has been obtained
- e) how the project affects the exercise of rights under traditional law and custom

This is a major legal deficiency.

6. Environmental Impacts Affecting Culture

Environmental impacts directly affect cultural values and native title rights:

- a) seabed disturbance affects ancestral resting places
- b) noise affects cultural species
- c) electromagnetic fields affect marine life relied upon for cultural practices
- d) visual impacts affect cultural landscapes
- e) cumulative impacts affect identity and wellbeing

The EIS/EES does not adequately assess these cultural-environmental connections.

7. Requests for Action

I request that:

1. The EIS/EES be amended to include proper consultation with Kurnai native title holders.
2. A Cultural Heritage Impact Assessment be undertaken by the correct Kurnai Elders and families.
3. A Native Title Impact Assessment be completed by native title holders.
4. The project not be approved until cultural, spiritual, and native title impacts are fully assessed.
5. The Commonwealth and Victoria recognise the cultural authority of Kurnai Elders, not substituted entities.

8. Conclusion

The Star of the South project poses significant risks to Kurnai cultural heritage, spiritual connection, and native title rights.

The current EIS/EES processes do not meet the standards of procedural fairness, cultural respect, or statutory compliance.

Approval should not proceed until these issues are resolved.

1. CULTURAL AUTHORITY STATEMENT

Cultural Authority Statement – Kurnai Native Title Holder

I, Pauline Mullett, am a Kurnai Native Title Holder for the VID 6007/97 Gunai/Kurnai determination of the our cultural landscapes connected to the Tatungoloong, Bratowoloong, Brayakoloong, Brabuwooloong & Krowathunkooloong, Five clans with cultural responsibilities for Country, waterways, Sea Country, and the cultural heritage places affected by the Star of the South project.

My authority arises from:

- a) descent from apical Kurnai ancestors,
- b) recognition by my predecessors and Elders and family,
- c) responsibilities under Kurnai law and custom, and
- d) my standing as a determined native title holder (VID 6007/1998).

Kurnai cultural authority is family-based, lineage-based, and grounded in Elders' responsibilities, not in administrative bodies or corporations.

Cultural authority cannot be transferred, delegated, or assumed by organisations that do not hold native title.

I make this statement to confirm that:

- 1. I speak with cultural authority for my Kurnai lineage and responsibilities.
- 2. The impacts of the Star of the South project on Sea Country, cultural heritage, and spiritual connection directly affect my cultural responsibilities.
- 3. The EIS/EES processes have not properly consulted the correct Kurnai families or Elders.
- 4. Any assessment of cultural heritage or cultural impacts must involve the actual native title holders, not substituted entities.

This statement is provided to support my submission and to ensure that the Commonwealth and Victorian governments recognise the correct cultural authority for Kurnai Country.

Pauline Mullett

30-6-2026

Gunai/Kurnai Native Title Holder

VID 6007/1998 Determination

Warragul, Victoria

2. NATIVE TITLE IMPACT STATEMENT

Native Title Impact Statement – Star of the South Project

1. Introduction

This Native Title Impact Statement is submitted by Pauline Mullett, a Kurnai Native Title Holder for the Gunai/Kurnai (VID 6007/1998), in relation to the Star of the South offshore wind project.

2. Native Title Rights and Interests Affected

The project affects:

- a) Sea Country connected to Gunai/Kurnai law and custom
- b) marine areas used for cultural practices
- c) ancestral pathways and Songlines
- d) spiritual responsibilities for Country
- e) areas of cultural significance beneath the water

These are integral to the exercise of native title rights and interests.

3. Failure to Consult Native Title Holders

The proponent and government agencies have:

- a) consulted corporate entities, not native title holders
- b) failed to identify the correct Kurnai families
- c) relied on organisations that do not hold native title authority
- d) excluded Elders with cultural responsibilities

This is inconsistent with:

- a) s 24MD and s 203BE of the Native Title Act
- b) procedural fairness requirements
- c) UNDRIP Articles 18, 19, 25, 31, 32

4. Cultural and Spiritual Impacts

The project will cause:

- a) spiritual loss
- b) disruption of cultural responsibilities
- c) interference with Songlines

d) loss of connection to Ancestors

e) cultural grief and harm

These impacts are not adequately assessed in the EIS/EES.

5. Environmental Impacts Affecting Native Title

Environmental impacts directly affect native title rights:

a) seabed disturbance

b) underwater noise

c) impacts on culturally significant species

d) electromagnetic fields affecting marine life

e) industrialisation of cultural landscapes

These impacts reduce the ability of native title holders to exercise rights and fulfil cultural responsibilities.

6. Request for Action

I request that:

1. A proper native title consultation process be undertaken with the correct Kurnai families.

2. A Native Title Impact Assessment be completed by native title holders.

3. The project not be approved until cultural, spiritual, and native title impacts are fully assessed.

4. The Commonwealth and Victoria recognise the cultural authority of Kurnai Elders, not substituted entities.

Pauline Mullett

Date: 30-6-2026

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