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**Subject:** New submission from EIS Submission  
**Attachments:** COMMONWEALTH-EIS-SUBMISSION-Federal-23-6-26-Sally-Everett.docx

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No

## Your Details

### Name

sally everett

### Address

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#### Submission Declaration

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To whom it may concern,

I wish to lodge this submission regarding the Star of the South Offshore Wind Project Environmental Impact Statement (EIS).

After reviewing the EIS documentation, I strongly oppose this project and respectfully request that approval not be granted under the EPBC Act.

My concerns include the potential impacts on Matters of National Environmental Significance, particularly threatened and migratory species, marine ecosystems, commercial fisheries, and the cumulative impacts associated with multiple offshore wind developments proposed for Gippsland.

The EIS acknowledges that numerous threatened and migratory species utilise the Bass Strait environment and may interact with the project area.

Species identified within the assessments include the Critically Endangered Orange-bellied Parrot, Critically Endangered Swift Parrot, Endangered Southern Giant Petrel, Critically Endangered Fairy Tern, Critically Endangered Little Tern, and Wandering Albatross, which is listed as Critically Endangered under Victoria's Flora and Fauna Guarantee Act. Many migratory species are also protected under international agreements including JAMBA, CAMBA and ROKAMBA.

The EIS acknowledges uncertainty regarding collision risk modelling and actual seabird mortality rates once the project becomes operational. Offshore collision monitoring is inherently difficult, with carcasses potentially sinking, drifting away or being scavenged before detection. The true extent of impacts on threatened species therefore remains uncertain. Given this uncertainty, I believe the precautionary principle should apply.

I am also concerned about impacts on marine mammals. The EIS identifies the presence of Blue Whales (Endangered and Migratory), Southern Right Whales (Endangered and Migratory) and Humpback Whales (Migratory) within the Bass Strait environment. The EIS acknowledges that baleen whales have high sensitivity to underwater noise generated during construction activities. Given the ecological importance of Bass Strait to these species, I remain unconvinced that mitigation measures can adequately avoid or minimise impacts.

The EIS also acknowledges potential impacts on commercial fishing activities. It states that compensation may be available where commercial fishers are unable to continue fishing within all or parts of the offshore wind farm area. However, compensation cannot replace long-established fishing grounds, local jobs, generational fishing businesses or Australia's domestic seafood production.

I am particularly concerned that this project is being assessed in isolation despite multiple offshore wind projects being proposed across Gippsland. The combined impacts of multiple developments on migratory species, marine mammals, commercial fisheries, vessel traffic, underwater noise and coastal communities have not been adequately assessed.

Finally, I do not believe sufficient social licence has been demonstrated. Many Gippsland residents, commercial fishers, recreational fishers, tourism operators and community members continue to express significant concerns regarding offshore wind development along this coastline.

Lakes Entrance is home to Victoria's largest commercial fishing fleet.

According to the Australian Fisheries Management Authority (AFMA), in 2020 over 3,000 tonnes of sustainable fresh seafood were landed by the 36 Commonwealth-licensed fishing vessels based in Lakes Entrance, accounting for 38% of all Victorian landings.

The EIS itself identifies uncertainties regarding impacts on threatened species, marine mammals, fisheries and cumulative effects. Where scientific uncertainty exists, particularly concerning nationally protected species and ecosystems, the precautionary principle requires decision-makers to err on the side of caution.

The true scale of cumulative impacts remains uncertain, particularly given the number of offshore wind projects proposed throughout Gippsland. I remain concerned that mitigation measures cannot fully eliminate impacts to wildlife and that the precautionary principle should apply where uncertainty exists.

**Fishing** forms an important part of Gippsland's economy, culture and identity. Potential disruptions to commercial and recreational fishing activities during both construction and operation. I remain concerned about the loss of access to traditional fishing grounds, impacts on commercial fishing businesses, effects on recreational fishing opportunities and broader impacts on regional communities that rely on the fishing industry.

**Gippsland's economy relies heavily on tourism, recreation and the natural environment.** Offshore infrastructure may be visible from parts of the Gippsland coastline, including areas extending from Wilsons Promontory through to east of Seaspray, with aviation lighting visible at night. Tourism impacts may occur where visitors are attracted by the region's relatively undeveloped and natural coastal character.

Tourism supports local accommodation providers, cafes, restaurants, retail businesses, caravan parks, recreational fishing operators and many other small businesses throughout Gippsland. Any reduction in visitation has the potential to negatively impact regional employment and local economies

*The Victorian* component of the project includes offshore export cables, landfall at Reeves Beach, underground transmission infrastructure extending inland to Giffard, construction compounds and associated infrastructure. I am concerned about impacts on native vegetation, wildlife, habitat, agricultural land, local landholders and community amenity. These impacts will be experienced directly by Gippsland communities.

**Compensation** cannot replace access to productive fishing areas or the livelihoods that depend upon them.

**Star of the South** is only one of several offshore wind developments proposed for Gippsland. I do not believe the cumulative impacts associated with multiple projects on wildlife, fisheries, tourism, coastal communities and regional infrastructure have been adequately assessed.

Numerous environmental and socio-economic risks associated with this proposal have been identified. I do not believe sufficient certainty exists to justify approval of a project of this scale.

**Gippsland's unique environment, wildlife, fisheries and coastal communities** should not bear unacceptable levels of risk where substantial uncertainty remains.

Lakes Entrance is home to Victoria's largest commercial fishing fleet. According to the Australian Fisheries Management Authority (AFMA), in 2020 over 3,000 tonnes of sustainable fresh seafood were landed by the 36 Commonwealth-licensed fishing vessels based in Lakes Entrance, accounting for 38% of all Victorian landings

### **Executive Summary concerns:**

The strongest concerns identified from the project materials reviewed to date are:

- Potential impacts on protected seabird species, particularly collision risk and reliance on avoidance assumptions.
- Potential impacts on Southern Right Whales and Blue Whales within biologically important areas.
- Uncertainty regarding benthic habitat disturbance, sediment transport, scour, and long-term seabed changes.
- Significant visual impacts on coastal communities from a large industrial development operating for more than 30 years.
- Reliance on predictive modelling and future adaptive management rather than demonstrated outcomes.
- Limited discussion of cumulative impacts from multiple offshore wind developments in Gippsland waters.

### **Birds and Collision Risk**

Bird impacts appear to be one of the most vulnerable areas of the assessment. Offshore wind remains relatively new in Australia and uncertainty exists regarding how local seabird species will respond. Collision-risk models depend heavily on assumptions about avoidance behaviour, flight heights, movement patterns, weather conditions and population data.

Key concerns:

- Small errors in avoidance assumptions may produce large changes in mortality estimates.
- European offshore wind experience may not translate directly to Bass Strait conditions.
- Threatened species such as the Shy Albatross warrant a precautionary approach.
- Monitoring after construction does not prevent impacts that occur before a problem is detected.
- Cumulative impacts from multiple offshore wind projects may be underestimated.

Question - What empirical evidence demonstrates that collision predictions for Australian seabirds are sufficiently reliable to support approval?

### **Whales and Marine Mammals**

The project overlaps areas identified as important for whale migration, feeding and other biological functions. Construction activities may generate underwater noise, vessel traffic and disturbance.

Key concerns:

- Overlap with biologically important whale habitat.
- Reliance on modelling to predict behavioural responses.
- Limited ability to predict long-term displacement effects.
- Construction noise and vessel activity.
- Cumulative effects from multiple projects in the Gippsland offshore wind zone. Suggested question:

Has the project demonstrated that migration, feeding and communication behaviour will remain unaffected with a high degree of confidence?

Benthic Habitats, Seabed Disturbance and Sediment Transport proponents often describe these impacts as manageable, questions remain regarding long-term consequences.

### **My key concerns:**

- Disturbance of benthic habitats during installation.
- Changes to current flow and seabed hydrodynamics.
- Long-term sediment transport effects.
- Artificial reef effects altering ecological communities.
- Potential attraction of invasive species
- Uncertainty regarding long-term Bass Strait conditions.

What evidence demonstrates that sediment transport and benthic habitat changes will remain localised over the life of the project?

### **Visual Amenity and Coastal Character**

Visual impacts are a legitimate planning consideration. The project may include up to 147 turbines, heights of up to 350 metres and associated offshore substations.

My key concerns are:

- Industrialisation of a largely natural seascape.
- Long-term impacts lasting 30 years or more.
- Potential effects on tourism and coastal character.
- Visibility under varying weather and lighting conditions.
- Night-time lighting impacts.
- Uncertainty regarding the final layout and appearance.

Question - has sufficient weight been given to the social, recreational and tourism value of the existing coastal landscape?

### **Cumulative Impacts**

One of the most important concerns is whether impacts have been assessed project-by-project rather than across the wider offshore wind zone.

Areas requiring cumulative assessment include:

- Bird mortality.
- Whale disturbance.
- Vessel traffic.
- Fisheries displacement.
- Visual impacts.
- Habitat fragmentation.
- Combined construction noise.

A project that appears acceptable in isolation may create different outcomes when assessed alongside other proposed developments.

### **Adaptive Management and the Precautionary Principle**

A recurring theme is reliance on future monitoring, management plans and adaptive responses.

Common pattern:

1. Impact identified.
2. Mitigation proposed.
3. Impact downgraded.
4. Monitoring promised.

This can shift environmental risk from the assessment stage to the operational stage. Where uncertainty exists regarding protected species or sensitive ecosystems, the precautionary principle may support a more conservative approach.

### **Potential Submission Themes**

1. Protected species and biodiversity.
2. Scientific uncertainty and evidence gaps.
3. Cumulative impacts across Gippsland.
4. Benthic ecosystem and sediment transport concerns.

5. Visual amenity and coastal character.
6. Reliance on adaptive management.
7. Application of the precautionary principle.

**The Star of the South 2026 draft EIS/EES Business and Tourism Impact Assessment** acknowledges that:

- There is a chance that visitors would be deterred and that regional output and employment would reduce.
- Potential visitors to the coastal settlements close to the Nooramunga Marine and Coastal Park may be displaced.
- Particular hospitality and tourism businesses that do not benefit from the influx of 'workers or windfarm visitors may suffer adverse impacts on their turnover during the construction period.

These statements come directly from the Business and Tourism Impact Assessment prepared as part of Star of the South's draft EIS/EES documentation released in 2026.

People value Gippsland for its unique natural environment, coastal experiences and local communities. With multiple offshore wind projects proposed for the Gippsland coast, many are asking what years of construction activity and long-term changes to the region could mean for tourism, local businesses and the communities that rely on them.

### **My concerns re birdlife – from Star of the South:**

Star of the South says 40% reduction, but 40% of what exactly?

- Star of the South states that increasing the turbine air gap could reduce modelled bird collision risk by around 40%

But the EIS does NOT clearly state the total number of bird collisions expected over the life of the project.

So what does 40% actually represent?

40% of 100 birds?

40% of 1,000 birds?

40% of 10,000 birds?

40% of 100,000 birds?

A 40% reduction may sound significant, but if collision numbers are large to begin with, substantial impacts on bird populations could still occur. The EIS does not quantify this.

- Star of the South also acknowledges that turbine collisions pose a risk to seabirds and that there is uncertainty in predicting actual impacts.
- The project further recognises that detecting bird collisions offshore is challenging, as carcasses may sink, drift away or be scavenged before they can be recorded.



■While a Seabird Monitoring and Management Plan is proposed, the EIS does not clearly explain how bird deaths in Bass Strait would be routinely detected, verified and counted during operations.

■This is particularly important given Gippsland lies within the East Asian–Australasian Flyway, one of the world's major migratory bird routes. The region supports protected, threatened and critically endangered seabirds and shorebirds.

These are species Australia has committed to protect under national environmental laws and international agreements.

■If the project is confident enough to claim a 40% reduction in collision risk, the public should also be told what level of bird mortality that reduction is based on.

### **“Star of the South Technical Reports – Seascape, Landscape and visual – from Seaspray to Lakes Entrance:**

#### **State significance - 90 Mile Beach.**

- potentially of national significance in the national context

- visually significant as the longest stretch of uninterrupted bed beach in the country, if not the world

- characterised by sandy beaches, low dunes, peninsulas and wetlands set against the wild seas of Bass straight

- valued by the community for the intact, indigenous coastal vegetation and scenic views"

#### **“Landscape character 4 area - 90 Mile Coast - conclusion**

**Landscape character areas - 4. Ninety Mile Coast, which has been assessed as a "high" landscape value"**

### **Ramsar Sites**

The Gippsland Lakes are an important Ramsar wetland site, which plays an integral part in the Asian-Australasian flyway as a destination for migratory waders. Particularly Lake Reeve and the wetlands north of McLennan's Strait including Victoria Lagoon. The "Ramsar Convention" is a management plan to protect environmental values and to maintain the site's ecological character. Building more than a thousand monstrous wind turbines on the doorstep of the Gippsland Lakes wetlands, can hardly be deemed as "maintaining the character of the area".

The potential impact on the environment is a major concern for communities in all six of the federal government's declared offshore Renewable Energy Zones. Which was revealed in the government's summary report on public submissions, with the large majority of people expressing concerns and or opposing these offshore wind projects. For example only 30% of public submissions wholeheartedly showed support the Gippsland Renewable Energy Zone.

**With over 400 indigenous plant and 300 native wildlife species,** the Gippsland Lakes region is a paradise for nature lovers and conservationists alike.

The proposed offshore power stations (wind-farms) pose an unacceptable risk to both the environment and biodiversity

**Scientific Studies** - Large wind turbines can alter the dynamics of local atmospheric and oceanic currents. The atmospheric wakes developed by wind-turbines are characterised by reduced windspeed as well as specific pressure conditions and enhanced air turbulence. During stable atmospheric circumstances, the wind speed deficits spread up to 70 km behind the wind farms. Modelling of the North Sea and Denmark wind farms found that horizontal wind speed changes occur up to 3,500m above the surface. The precipitation pattern is greatly affected by the very large wind farms due to the enhanced mixing in the boundary layer. Increased precipitation occurs at the front and within the wind farm, thus leaving the air mass relatively dry downstream when it reaches the coast. Resulting in a decrease in precipitation here compared to the control run.

**Avian Flyways** - Bird collisions with wind turbines are a major concern for avian populations, primarily occurring due to the blades appearing as a transparent blur to birds

**Construction phase** - Offshore wind farm construction can cause significant underwater noise pollution, primarily from pile-driving for turbine foundations. This noise can disrupt marine mammals and fish by interfering with their communication, navigation and feeding, leading to behavioural changes, physiological stress or even temporary or permanent hearing loss. Construction noise is described as sharp concussions that are capable of travelling some tens of kilometers distance, which may lead to injury or displacement of marine animals

### **Operational Phase**

Operational noise from offshore wind farms, though quieter than construction, can create a constant low-level sound that interferes with marine life's ability to communicate, navigate and or feed. This underwater noise, which is often in the low-frequency range and can be detected over several kilometres, may cause behavioural and physiological stress in species like whales, dolphins and fish. The noise level correlates with turbine size. The much larger turbines proposed for Australia's projects will emit far greater noise than those small 8MW turbines used overseas.

### **Comments from leading Research Strategist - Dr. Anne Smith**

Dr. Smith is an Environmental Research Strategist with a PhD focused on building resilience, wellbeing, and capacity in crisis-impacted communities. Her work spans environmental systems analysis, strategic planning, and advocacy, with a strong focus on protecting Australia's unique habitats and biodiversity from industrial-scale destruction masquerading as "green" progress. Dr Smith continues to call for policy grounded in truth, science, and stewardship not ideology. She warns that the current energy experiment is not only economically reckless, but ecologically irreversible.

## Disruption of Migratory Routes

Dr Smith advises the impact of offshore wind farms on migratory routes is another area of growing concern. Many whale species, such as the Southern Right Whale and Humpback Whale, migrate through the waters where offshore wind farms are being developed. The noise pollution generated by these projects can create acoustic barriers, effectively blocking migratory corridors that whales have used for millennia

**Dr Smith's Summary** -The Gippsland Offshore Wind Transmission Project presents environmental risks that may be too high to justify. The potential damage to marine ecosystems, particularly the disruption to whale migration routes, dolphin populations, and benthic habitats, coupled with the serious underreporting of lifecycle carbon emissions, calls into question whether the long-term benefits outweigh the irreversible harm to biodiversity.

For these reasons, I respectfully request that the Victorian Government refuse approval for the Star of the South Offshore Wind Project.

This submission has been collectively prepared by 3 residents of The Honeysuckles – Robert J Everett, Sally Everett, and Diane Wood.

This submission is in my name – Sally Everett

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For these reasons, I respectfully request that the Commonwealth Minister refuse approval of the Star of the South Offshore Wind Project.

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Sally Everett

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