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To: Southerly Ten
Subject: New submission from EIS Submission
Attachments: BirdLife-Australia-Submission-Star-of-the-South-June-2026.pdf

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BirdLife Australia

Your Details

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16 June 2026

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Submitted by online consultation portal: southerlyten.com.au/project/star-of-the-south/environmental-assessment/eis-submissions-portal/ [Environmental assessment | Star of the South](#)

BirdLife Australia Submission to the Environmental Impact Statement: 'Star of the South Offshore Wind Farm Project' EPBC Number 2020/8650

BirdLife Australia welcomes the opportunity to make a submission to the Environmental Impact Statement: 'Star of the South Offshore Wind Farm Project' EPBC Number 2020/8650.

As the first EIS for any offshore windfarm in Australia, BirdLife expects the EIS for Star of the South to explore deeply any issues that may be new to offshore windfarm developments because of the unique context of the Australian marine environment while also drawing on the lessons learned from overseas offshore windfarms. This EIS meets this expectation only in part. The EIS has:

- A strong and welcome focus on the vastly different seabird communities in the Bass Strait as compared to the Northern hemisphere
- Relied too heavily on popular but untested assumptions regarding Bass Strait migrants to claim a negligible impact on these species including EPBC-listed shorebirds and the Swift Parrot
- Not elaborated sufficiently on advanced monitoring and mitigation technology that could confirm the claim of low collision and displacement risks for birds by virtue of the windfarm's design
- Not considered shut-down on-demand technology to help mitigate its impact on birds
- Not explored nature positive / net gain activities.

In summary, the EIS provides a good basis on which to assess the bird impacts on seabirds but needs improvement for Bass Strait migrants and potential mitigation actions.

BirdLife Australia is happy to elaborate on our specific points to assist with the assessment of the EIS, where necessary. For further information, please contact me directly by e-mail [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]

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About BirdLife Australia

BirdLife Australia is an independent grassroots charity, with over 465,000 supporters across Australia. We have been the voice for Australia's birds for 125 years, protecting native birds and their habitats with on-ground projects and advocacy, informed by rigorous science and sound academic partnerships. Our conservation programs adopt a multi-species landscape-scale approach that is supported by thousands of volunteers and citizen scientists. BirdLife prides itself on our active and well connected local branches including BirdLife East Gippsland, who have been part of the community reference group for this project and will submit their own comments on the EIS.

Australia is facing an extinction crisis, with one in six native bird species at risk of which seabirds and migratory species make up a disproportionately large part. Much of this is driven by habitat destruction and invasive species and exacerbated by the effects of rapid, human-induced climate change. It is BirdLife's mission to halt and reverse this crisis.

The transition to renewable energy has been recognised by BirdLife both as a necessary step to reduce the impacts of climate change and as a considerable threat to native birds, especially migratory species. BirdLife is therefore engaging with renewables intensively across the private, NGO and government sector bringing to bear our expertise and status as a trusted voice for birds and nature. We provide our science and data to ensure this energy transition is nature positive and results in a net gain for birds and biodiversity. This includes the development of a free, online renewable energy siting tool, AviSTEP, avistep.birdlife.org, and the establishment of a cross-departmental Renewable Energy Taskforce to engage with the sector.

Summary assessment of 'Star of the South' based on the EIS provided

The EIS for the 'Star of the South' needs to be assessed in the context of ongoing decline of Australia's native birds. This requires a focus on identifying and preventing possible additional negative impacts on Matters of National Environmental Significance (MNES), including bird species listed as threatened, marine or migratory. In its current form the EIS achieves this only in part with a detailed section on seabirds but limited consideration given to Bass Strait migrants.

This submission outlines targeted comments and recommendations for specific sections that could strengthen the EIS and ensure it minimizes the impact of the 'Star of the South' offshore windfarm development on MNES.

Summary Table of Recommendations to improve the 'Star of the South' EIS

Report Chapter / Appendix	Recommendation
Chapter 1 and 2	Acknowledge or elaborate on potential Nature Positive / Net Gain opportunity arising from the project
3.2.1.4 Avoidance of sensitive ecological features	Several promising mitigation measures are proposed and should be implemented. The sensitivity of Bass Strait migrants to the windfarm, however, needs to be clarified more directly. The orientation of corridors in

	windfarms is as important as the spacing between turbines and needs to be designed with dominant avian flight paths in mind.
4.6.2.1 Offshore substations	More detail on management on monitoring and management of use and potential nesting of EPBC listed taxa on windfarm infrastructure is required.
12.5.4 Bass Strait migrants	Further study of migration routes of Bass Strait migrants especially Swift Parrots and migratory shorebirds is necessary to confirm low impact.
12.7.2.2 Physical presence of operational turbines: barrier	Displacement and Barrier effects offshore for Australian seabirds are largely unknown and while a low impact can reasonably expected this needs to be monitored closely.
12.7.3.1 Physical presence of operational turbines: collision	Mitigation action to turbine collisions including collisions with the mast need to be explored more thoroughly.
20.6.2 Recreational boating and fishing	Behaviour change education to ensure low impact of the boating and fishing community on birds is recommended
21.7.1.3 Changed seascape impacting visitation and tourism	Recognise and support bird tourism as an important component of tourism in the area.
23.7.7 Reporting	Owing to the novelty of the project bird monitoring results should be peer-reviewed and published in a timely fashion
23.8.2 Recommended mitigation measures	Consider mitigation measures for Bass Strait migrants including migratory shorebirds and explore shut down on demand

Introduction

BirdLife Australia focused its assessment of the EIS mainly on our area of expertise in scientific ornithology and bird conservation. The lack of comment on other sections of the EIS does thus not imply our endorsement or approval of the representations made on those other aspects of the EIS. We are providing detailed comments on Chapters 1-4, 12, 18, 20, 21, 23, Attachment IV as well as the Technical Report E in the below and have also summarised the key points in the Table above for a succinct overview.

Chapter 1

1.1.2 Project Objectives

Given Southerly Ten's Nature Positive focus and the increasing emphasis in the sector and the Australian government, it is disappointing not to see a nature positive or net gain objective represented in this part of the EIS. The EIS highlights many leads to explore nature positive activities.

Chapter 2 Project Rationale

No reference is made to nature positive / net gain initiative that should be supported long term through the project if it is to meet Southerly Ten's own commitments as well as community and Commonwealth government expectations under the Net Gain Test. This is even more surprising as this has the potential for long term regional employment including for the Indigenous community.

Chapter 3 Project Development

While not directly subject to this EIS, BirdLife welcomes trenchless installation of the shore crossing and onshore underground transmission lines as lower impact for sensitive bird species.

3.2.1 Site selection

The assertion that the current site selection avoids sensitive ecological features, namely 'critically endangered migratory bird paths' is likely incorrect and certainly has not been demonstrated. The migratory route of the critically endangered Swift Parrot, *Lathamus discolor*, across the Bass Strait has not been documented and neither has the flight height of the species during the crossing or the circadian timing. However, observational records of the species colliding with a ship in Bass Strait after dark suggest that at least some migration occurs at night and across open water rather than island hopping to Wilson's Promontory. In the context of this EIS regular observations on the Gippsland coast such as on Raymond Island or Box Bank make it a strong possibility that the species crosses the proposed windfarm area on their migration. Similarly, the migratory route of the critically endangered Far Eastern Curlew, *Numenius madagascariensis*, to and from Tasmania may involve crossing the project area. In addition, the species has been documented migrating at the height of the Rotor Swept Zone.

3.2.1.3 Proximity to the grid

The use of existing transmission networks is a welcome measure to limit increased collision risk for birds through powerlines.

3.2.1.4 Avoidance of sensitive ecological features

The increased air gap of 35 metres is likely to reduce collision risk for some seabirds. Its effect on other bird species migrating across the Bass Strait is unclear and could be an increase or a reduction of collision risk for species such as Swift Parrot, Tasmanian Boobook and migratory shorebirds.

Light pollution management measures are welcome.

Minimum spacing of turbines is essential as birds are more likely to be forced to travel through a windfarm this size rather than fly around it. The orientation of the corridors created through the windfarm by the spacing should be

designed to align with the pre-dominant direction of movements of the species of concern. Avoidance behaviour of seabird species in Australia is almost entirely unknown and opportunity for extrapolation is limited. This project if approved, would provide an opportunity to clarify avoidance behaviour and inform necessary mitigation actions for this project and the design of future offshore wind projects.

3.5 Port alternatives

While acknowledging that any port decisions and port development EIS are out of the proponent's control, we do note our concern about the potential development and use of the Port of Hastings due to its vicinity to the Western Port Ramsar site.

Chapter 4 Project description

4.6.1.2 Lighting and Marking

Currently trials are going ahead to explore if painting one blade red reduces collision risk for birds in the offshore space. Will this be considered in the final design?

4.6.2.1 Offshore substations

Substations (and transition pieces) may provide an attractive roosting or even nesting platform for seabirds. Guano removal alone may not be sufficient or even inappropriate, especially where EPBC listed species may be nesting. How will this, presumably undesired, outcome be managed?

Will provisions be made on the substations (and / or turbines) for equipment to monitor collision or facilitate shut down on demand if found necessary eg fixed radar, camera systems etc.

4.7.5.3 Scour and cable protection installation

The introduction of foreign material to the seabed, especially rock, may bear a biosecurity risk of introducing invasive species. How will this biosecurity risks be managed? Are their protocols in place similar to those for ballast water?

4.9 Offshore decommissioning

During the life of the project, the windfarm infrastructure may have developed considerable biodiversity values e.g. as artificial reefs or breeding grounds for EPBC listed taxa. How will this be taken into account?

Chapter 12

12.5 Existing environment

Generally, the study areas have been chosen well, however, we note a lack of migratory shorebird monitoring in Tasmania for arrival and departure times.

12.5.2.1 Regional context

I am surprised Suliformes were not included in this list of ordered as they are part of the technical report.

12.5.3.1 Habitat use, site fidelity and flight behaviours of shorebird

Survey methods were unsuitable to detect migratory movements of migratory shorebirds to and from Tasmanian wintering grounds or from New Zealand in the case of the Double-banded plover wintering in western Victoria. So the assurance that 'their occurrence is likely to be extremely low.' Is not justified. Earlier in the document a north-westerly departure direction from Corner Inlet was reported for several shorebird species. If a similar departure direction were true for species wintering at known shorebird sites in Tasmania such as Cape Portland or Musselroe Bay, interaction with the windfarm infrastructure would be plausible.

12.5.4 Bass Strait migrants

The statement that Bass Strait migrants are more likely to island hop than traverse across the open waters of Bass Strait and are therefore unlikely to interfere with the windfarm infrastructure is simply an untested assertion for most species. For instance, recent tracking of Tasmanian Boobook, *Ninox leucopsis*, given as an example for an island-hopping species in this EIS, has been shown to cross Bass Strait in a single non-stop flight. Excluding such species from further assessments therefore seems premature and should be revised.

The assertion that Swift Parrots are unlikely to cross through the offshore windfarm area is not supported by evidence, quite the opposite. The study itself reports an incidental sighting of the species on Reeves beach, in all likelihood the location where the birds would have made landfall given the area has a long-term feeding opportunities and limited tree cover.

12.7 Operation Impacts

12.7.2 Other impacts

Physical presence of operational turbines – displacement (OOB-I003)

The displacement effects for Australian seabird species are entirely unknown and comparison to overseas taxa is of only limited value, in particular, for species such as Albatross that do not occur in areas of operational windfarms overseas. In addition, the Star of the South windfarm turbines are likely to exceed those of operational overseas offshore windfarms with available displacement data considerably in size by the time of completion further limiting the ability to extrapolate from those findings. It is paramount to plan for monitoring of these effects, the lack thereof or indeed attraction to the windfarm area in order to design any appropriate mitigation measures.

12.7.2.2 Physical presence of operational turbines: barrier effects (OOB-I004) Check Monitoring plan and offset

The arguments around the uncertainty of displacement effects of offshore windfarms in Australia apply similarly to barrier effects. The EIS seems to argue that the barrier effects are mitigated by the proposed turbine spacing which may be correct, however, pelagic seabirds in particular may avoid the windfarm area altogether owing to the great height of the turbines creating a visual barrier for these birds of the open seas. The footprint of the windfarm area may further help to reduce any barrier effects. As with the displacement effects careful monitoring of barrier effects is necessary to design appropriate mitigation measures and to learn the potential impact of additional windfarms in the Bass Strait and its cumulative effect.

The argument that the barrier effects and potential additional energetic expense must be negligible for long distance migrants is a fallacy considering that on the southward journey most of the species will be at the end of a long and energetically draining journey having used up a lot of their reserves already. This is demonstrated regularly by the wrecks of emaciated shearwaters found on Victorian beaches upon return from their Northern Hemisphere migration.

For Bass Strait migrants the displacement and barrier effects of the windfarm have not been explored at all. Especially on the northward migration, species like parrots and small passerines may be at their energetic limit by the time they encounter the windfarm area and flying around the windfarm may cause additional mortality.

In summary, the likely effects of displacement and barrier effects at the individual and population scale is insufficiently explored to allow an assessment as negligible. Monitoring and possible mitigation of these impacts is required.

12.7.2.3 Physical presence of operational turbines and infrastructure: attraction (OOB-I005)

Attraction to turbine infrastructure may also be a factor for Bass Strait migrants not just seabirds. For both groups this provides an important opportunity to better understand the species that may be impacted by the presence of the windfarm and routine, possibly automated monitoring may therefore be appropriate rather than the opportunistic monitoring during maintenance work proposed.

12.7.3.1 Physical presence of operational turbines: turbine collision (OOB-R005)

We accept that collision risk modelling for Australian seabird species is complicated because this is the first project of its kind in the southern hemisphere. We note that no risk modelling is presented in Table 12-22 for any Bass Strait migrants, except the White-throated Needletail. For reasons stated above we believe some of these species need to be included, especially the Swift Parrot.

The Swift Parrot has been assessed in Table 12-23 as highly unlikely to experience population-level impacts. Given the small population size of maybe 400 birds, the declining population trend, likely skewed sex ratio and their propensity to travel in flocks a collision of a migratory flock with a windfarm could easily kill 1% of the population. The potential effect on Swift Parrots needs to be investigated more thoroughly. Mitigation measures should be considered.

The assessment of turbine collision has been restricted to the rotor swept zone. It is well known that migratory land birds, in particular, collide with light houses and other fixed structures at sea especially during low visibility conditions. The likelihood of collision with the turbine mast in the windfarm area needs to be explored.

Chapter 18

Table 18-5 does not list the impact on Gang-gang cockatoo, so we cannot assess the likely impact.

The loss of at least 6.5 ha of Swift Parrot foraging habitat should be minimised as far as possible and offset to ensure feeding area remains available for Swift Parrots. Foraging opportunities at this location are of particular importance as it is a departure or arrival area before or after the energetically expensive Bass Strait crossing for this migratory bird in an area that is otherwise largely cleared of woodland vegetation.

Chapter 20

20.6.2 Recreational boating and fishing (SOC-I005)

BirdLife Australia has engaged intensively with local communities including boating and fishing communities to affect behavioural change around using and accessing sensitive habitat for migratory and resident shorebirds as well as breeding terns. A workforce from outside the local area who likely will want to avail itself of the amazing outdoor activities the area provides will be less aware of sensitive behaviour around protected species when boating and fishing. Similarly, the displacement of these activities during some of the construction work could mean that water users may encounter places where they are less aware of how to help protect biodiversity values. The Stakeholder Engagement Plan should thus include a provision for relevant educational work to be delivered across the community.

Chapter 21

21.5.3.1 Tourism asset

21.7.1.3 Changed seascape impacting visitation and tourism (BTM-I013)

Birdwatching is one of the fastest growing tourism industries worldwide and already contributes substantially to tourism revenue in Australia and locally with birdwatchers seeking out local National Parks and Key Biodiversity Areas such as Corner Inlet. The construction and operation of a windfarm is often associated with impacts on birds and this may put off birdwatchers to travel to the area to pursue their hobby. To counteract this impact (and at the same time improve general community attitudes to the windfarm) bird tourism initiatives should be included as possible projects to be supported by the Community Benefits Fund set up by the project.

Chapter 23

23.7.3 Monitoring

23.7.7 Reporting

As this project is the first of its kind in the southern hemisphere there are considerable knowledge gaps for seabird species but also, locally, for Bass Strait migrants which must be included in the monitoring program including the Swift Parrot and Blue-winged parrot. We welcome that filling these knowledge gaps is a stated objective of the operating plan. In order to truly fill these knowledge gaps, it is necessary that the results of the monitoring are published and peer reviewed in a timely fashion and this should be part of the monitoring program.

23.8.2 Recommended mitigation measures

This section does not include mitigation measures for Bass Strait migrants such as Swift Parrot, Blue-winged parrot, migratory shorebirds or Tasmanian Boobook.

The project does not consider shut-down-on-demand as a mitigation measure to avoid collisions with turbine blades using automated visual or radar technology that is already being deployed successfully overseas. While the raised hub height is predicted to reduce likely seabird collisions its impact on Bass Strait migrants, positive or negative, is unclear. A monitoring system tracking collisions and near misses as well as migration events through the windfarm area is necessary to be able to conduct meaningful assessment of the impact of this first offshore windfarm in the southern hemisphere on birds. Given this, an integration with the technology deployed for monitoring with shut down on

demand technology seems like a logical step to ensure the impact on birds is minimised further. Available technology is reviewed here www.birdlife.org/wp-content/uploads/2024/08/Curtailment_Report_Digital_Spreads.pdf