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Are you making this submission on behalf of someone else and/or an organisation?

Yes

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

Wildlife Coast Cruises pty ltd

Your Details

Name

[REDACTED]

Address

[REDACTED]

Email

[REDACTED]

Confirm Email Address

[REDACTED]

Phone Number

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Submission in Response to the Environmental Impact Statement (EIS) – Star of the South Offshore Wind Farm

To Whom It May Concern,

We appreciate the opportunity to provide a submission in response to the Environmental Impact Statement (EIS) for the Star of the South Offshore Wind Farm project.

Firstly, we would like to acknowledge the considerable effort, detail and scientific work that has been undertaken in preparing the EIS. The scale of the assessment is significant, and it's encouraging to see a comprehensive approach being taken to understanding the environmental, social and economic impacts of the project.

Wildlife Coast Cruises has participated in previous consultation processes and has been pleased to contribute information relating to whale movements and marine wildlife observations within the project area. However, while consultation has occurred, we remain concerned that the impacts on our business and the broader whale watching tourism sector have not been adequately recognised or assessed within the EIS process.

Wildlife Coast Cruises is Victoria's largest and most established whale watching operator, having operated for more than 30 years from Phillip Island and, seasonally, from Port Welshpool. We currently operate three 100 passenger vessels and carry approximately 50,000 passengers annually across a range of wildlife and marine tourism experiences.

Across July through to November each year, we operate daily whale watching tours from Port Welshpool. During this period, at least one of our vessels operates daily tours in the waters between Wilsons Promontory and the designated Star of the South project area, occasionally entering the proposed wind farm zone itself. As a long term operator with thousands of hours spent observing whale behaviour in this region, we believe our experience provides a valuable practical perspective that should be given greater consideration.

Economic and Regional Tourism Significance

Our Port Welshpool whale watching season typically consists of approximately 100 whale watching departures between July and November each year. Collectively, this operation represents an estimated annual economic contribution to the region of approximately \$2 million.

This contribution reflects more than direct ticket sales. It includes local employment, fuel, vessel maintenance, food and catering suppliers, port services, hospitality and wider visitor spending generated by guests travelling to Port Welshpool for our whale watching experiences.

Many of our passengers travel to the area from outside the region, often staying locally, dining nearby and visiting other local attractions. As a result, the value of our whale watching operations extends well beyond Wildlife Coast Cruises and supports the regions broader network of businesses.

Our concerns can be grouped into three key areas;

Operational Impacts on Existing Tourism Businesses

The project is already having a direct impact on our operations through increased pressure on marine infrastructure. The presence of additional vessels undertaking surveys and preliminary project works has contributed to reduced berth availability and operational space at Port Welshpool Jetty.

As the project progresses into construction and operational phases, we are concerned that vessel numbers associated with the wind farm may further constrain access to local jetties and marine facilities. This has the potential to limit our ability to expand operations and may negatively affect other existing marine users and tourism businesses operating in the region.

We believe these impacts on existing businesses require further assessment and acknowledgement within the EIS.

Potential Impacts on Whale Distribution and Tourism Viability

A significant concern for our business is the possibility that construction activities, increased vessel traffic, underwater noise and other disturbances associated with the project could alter whale movement patterns within the region.

At present, we acknowledge there is no definitive evidence demonstrating that whales will be displaced further offshore. However, the absence of evidence should not be interpreted as evidence of no impact. Given the scale of the proposed development and the importance of the area to migrating whales, mother and calf pairs and juvenile whales that often remain in the region feeding for extended periods, we believe this risk warrants continued investigation and monitoring.

Our whale watching operations rely on whales remaining accessible within a practical operating range from Port Welshpool. Should construction or operational activities result in whales spending significantly more time further offshore, the viability of daily whale watching tours could be compromised.

This would have direct economic consequences not only for our business but also for the broader tourism economy that benefits from whale watching visitation to the region.

We therefore believe that the potential impact on whale distribution, whale watching tourism and associated regional economic activity requires greater consideration within the assessment process.

Consultation and Stakeholder Engagement

Perhaps our greatest concern is that while Wildlife Coast Cruises has engaged with the project and raised these issues during earlier consultation processes, we do not feel our concerns have been adequately recognised or addressed in the latest EIS documentation.

We have previously identified that our business operates extensively within the affected area and have highlighted the potential impacts on both whale watching operations and marine tourism infrastructure. Despite this, there appears to be limited acknowledgement of these concerns within the documentation.

As one of Victoria's most significant marine wildlife tourism operators, with more than three decades of operational experience in the region, we believe our knowledge and stakeholder interest justify a greater level of engagement and consideration than has occurred to date.

For this reason, we remain concerned that the consultation process has not fully achieved its intended purpose and that important operational and economic impacts on existing marine tourism businesses may not yet be adequately understood.

Conclusion

Wildlife Coast Cruises supports the transition to renewable energy and recognises the importance of projects such as Star of the South in Australia's future energy mix. Our submission is not intended to oppose renewable energy development, but rather to ensure that the impacts on existing marine users, tourism operators and marine wildlife are properly considered and addressed.

Given the concerns outlined above, we respectfully request that the assessment process further examine:

- The cumulative impacts on marine tourism businesses operating within and adjacent to the project area.
- The availability and future capacity of local marine infrastructure, including Port Welshpool Jetty and associated facilities.
- Potential impacts of construction and operational activities on whale movement patterns, particularly mother and calf pairs and juvenile feeding whales.
- The economic implications should whale distribution change in a manner that affects the viability of established whale watching operations.
- The adequacy of stakeholder consultation with long standing marine tourism operators that have substantial experience and knowledge of the area.

We believe these matters warrant further consideration before the EIS process is finalised and any approval decisions are made.

Thank you for the opportunity to provide this submission.

Yours sincerely,

[Redacted signature]

[Redacted contact information]

[Redacted contact information]

PH 1300 763 739 INT +613 5952 3501
WWW.WILDLIFECOASTCRUISES.COM.AU

