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Gippsland Climate Change Network

Your Details

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Executive Summary

The Gippsland Climate Change Network (GCCN) welcomes the opportunity to provide feedback on the **Commonwealth Environmental Impact Statement (EIS)** for the Star of the South Offshore Wind Project.

GCCN Board of Directors supports the Star of the South project and the broader development of offshore wind in Gippsland, provided that approvals are only accompanied by clear commitments to environmental protection, regional economic development, community participation and transparent governance. We therefore request that the following matters must form part of any approval framework:

- **Establish a Gippsland-based operations, supply and maintenance hub** to maximise long-term regional employment, supply chain participation and economic benefit.
- **Implement a comprehensive Workforce Development Strategy** that prioritises local employment, training pathways and engagement with schools, TAFEs and universities to prepare Gippsland's future workforce.
- **Undertake ongoing independent environmental monitoring** throughout construction and operation, with all monitoring data publicly available through a transparent reporting platform.
- **Require assessment and management of cumulative impacts** proposed within Gippsland waters, rather than assessing projects solely in isolation
- **Establish a transparent and consistent Community Benefit Framework** that:
 - Commences during construction;
 - Benefits all affected coastal communities;
 - Is developed and administered with strong local community involvement.
- **Support independent community engagement and education initiatives**, recognising that social licence is a shared responsibility between governments, communities and project proponents.

The recommendations contained within this submission are intended to strengthen the project's environmental performance, social license and regional legacy.

The Strategic Importance of Offshore Wind for Gippsland

We agree that Australia's electricity system is changing. Renewable energy is central to future supply and demand is rising as homes and businesses electrify.

We agree that Coal-fired power stations are retiring faster than initially expected, with 90% of capacity expected to close by 2035 and all by 2051. This creates an urgent need for new energy sources to offset this loss. New capacity must be developed before coal-fired power stations close to avoid supply shortfalls and impacts to price and reliability.

Offshore wind represents one of the most significant economic development opportunities available to Gippsland. The sector has the potential to create thousands of direct and indirect jobs across construction, operations, maintenance, manufacturing, logistics, professional services and education. Importantly, it provides a pathway for workers currently employed in traditional energy industries and creates career opportunities that enable younger generations to remain and build their futures within the region.

We agree that Gippsland has extensive untapped offshore wind resources. Bass Strait winds are particularly strong and consistent, and match daily and seasonal peak demand for electricity. Experience from overseas demonstrate these are world class opportunities to develop energy generation to replace our aging coal fired power stations.

While onshore wind is generally recognised as a lower-cost source of renewable energy, Gippsland's unique combination of highly valued landscapes, productive agricultural land and dispersed rural communities means that large-scale onshore developments have faced considerable social and land-use challenges. Although offshore wind projects also require careful management of visual, environmental and community impacts, we believe they provide a more suitable opportunity to deliver the scale of renewable energy generation required to support Victoria's energy transition and mitigate climate change.

Offshore turbines benefit from stronger and more consistent wind resources, higher generation capacity and reduced competition with agricultural land uses, while being located well away from residential communities.

Support for the environmental mechanisms

We agree that a trenchless construction method should be used to install the shore crossings. This will avoid open-cut trenching in the sensitive nearshore and coastal environment which are important to local communities.

We agree and support the principle that extreme care should be taken and after construction and that all construction areas will be rehabilitated as soon as possible after works are finished, leaving no permanent visible above ground infrastructure except ground-level pit lids and signage.

We agree and support detailed decommissioning plans to be prepared in advance. These plans will describe the proposed activities, methods, potential impacts and management measures. The community needs ample opportunity to review these plans and make recommendations.

We strongly support the establishment of an operations and maintenance base within a Gippsland port to maximise the long-term economic benefits of the offshore wind industry for the region. While the final

port location will depend on a range of technical, environmental, commercial and supply chain considerations, it is essential that regional outcomes remain a key factor in decision-making.

The long-term success of the offshore wind industry in Gippsland will depend not only on energy generation, but also on the development of local jobs, businesses and skills. We therefore strongly support initiatives that build regional supply chains, create sustainable local employment opportunities and strengthen workforce capability. The establishment of the Clean Energy Centre and Centre of Excellence for Renewable Energy Training represents an important investment in preparing Gippsland's workforce for emerging industries, and should be complemented by greater engagement with schools, TAFEs and universities to create clear pathways into future energy careers.

We also support further investigation of the Barry Beach Marine Terminal as a potential operations and maintenance hub. A comprehensive feasibility study and environmental assessment are essential to determine its suitability and to ensure that Gippsland is well positioned to capture these opportunities. Securing a locally based operations hub would provide lasting regional benefits well beyond the construction phase and help establish Gippsland as Australia's leading offshore wind service centre.

Project Development

We support the reduction in the maximum number of turbines from 400 to 147, reflecting the significant technological advancements that have occurred since the project's inception. While modern turbines are larger and may have greater visual prominence, the reduced number of structures required to deliver the same generating capacity minimises the project's overall footprint reducing potential impacts on the marine environment and coastal landscape.

We also support the selection of monopile foundations where they are demonstrated to be the most appropriate engineering solution. However, we encourage continued research, acoustic modelling and field trials to better understand and minimise the potential impacts of installation activities, particularly underwater noise associated with pile driving, on marine mammals, fish and other sensitive species. We strongly support the use of best-practice mitigation measures, including technologies such as bubble curtains and other noise attenuation techniques, together with adaptive management approaches informed by ongoing monitoring.

Turbine placement should continue to prioritise the avoidance of sensitive marine habitats and areas of high ecological value wherever practicable.

Communication and Engagement

We acknowledge that Star of the South has undertaken one of the most extensive community engagement programs associated with offshore wind development in Australia. Over a number of years, the project has demonstrated a commitment to engaging with local communities, stakeholders and industry groups, and has invested significantly in ensuring information is accessible and responsive to community concerns.

We commend the project's use of local personnel and regional expertise to support engagement activities and communicate project information. This approach has helped build local understanding of the project and foster more informed conversations about both the opportunities and challenges associated with offshore wind development. We have found Star of the South to be transparent in its communications and responsive to stakeholder feedback throughout the project's development.

We also recognise the company's support for regional initiatives, including participation in events such as the Gippsland New Energy Conference, which provide important forums for community discussion, workforce development and local supply chain engagement.

We support the inclusion of both site-specific and broader regional considerations within the project's assessment area, including the use of a 100-kilometre study buffer to better understand potential cumulative and indirect impacts. We encourage Star of the South to continue its engagement with commercial and recreational fishing interests throughout all phases of the project. Fishing forms an important part of Gippsland's economy, culture and lifestyle, and ongoing collaboration with these stakeholders will be essential to minimise impacts, identify practical solutions and maintain community confidence in the project.

The Gippsland community has a strong connection to its coastal and marine environments. Continued consultation, transparent reporting and adaptive management will be critical to ensuring that these values are respected and protected throughout the life of the project.

Environmental Assessment Summaries

It is difficult for us to assess the rigour and scientific methodology of these assessments and urge the Government to reach out to suitably qualified independent experts to test the claims and ensure that we get the best and most environmentally sound methodology in this deployment

We strongly support the implementation as suggested in the report of a comprehensive **Stakeholder Engagement Plan** that provides timely and transparent information regarding construction activities, project milestones and potential impacts on local communities. Advance notice of construction periods, access restrictions and other disruptions will be essential to allow residents, businesses and visitors to plan accordingly and minimise inconvenience.

GCCN strongly encourages regulators to assess cumulative impacts across all offshore wind developments proposed within Gippsland waters. While individual projects may demonstrate acceptable impacts in isolation, the combined effect of multiple construction programs, vessel movements, port activities, transmission infrastructure and workforce demands may create impacts that are materially different from those assessed on a project-by-project basis.

Gippsland's coastline is an important tourism asset and a valued community resource. Coordinated planning, transparent construction schedules and clear communication between proponents, regulators and the community will be critical to maintaining public confidence and ensuring that residents and visitors can continue to enjoy the region's coastal amenity throughout the construction period.

This principle is equally important for the commercial and recreational fishing sectors, which make a significant contribution to Gippsland's economy, culture and lifestyle. Construction activities and temporary exclusion zones should be carefully coordinated across projects to minimise disruption and ensure that fishing communities are not disproportionately affected by overlapping developments. Ongoing consultation and adaptive management will be essential to achieving this outcome.

We support and encourage a **Workforce Development Strategy** to be implemented to maximise regional participation in the activity. Without this local participation, support for the industry will be reduced.

We strongly support and believe it is essential to the local support of the project that a **Community Benefit Program** be designed promptly in consultation with the local community. This should adopt the following framework:

- Community benefits should be mandated.
- Community benefits begin when construction begins
- Benefit schemes should be a uniform and simple. All proponents should adopt similar guidelines
- Benefits support all communities affected by the development and not just restricted to small renewable energy zones
- Community Benefits must be managed by coastal communities.

Environmental Management Framework

We support an environmental management system to be implemented to manage compliance with environmental approvals and drive continuous improvement. An environmental compliance plan will be in place for construction and operation. This will bring together both the Commonwealth and Victorian EMFs to ensure the entire project meets all relevant approval conditions and legislative requirements.

This system needs to be developed to be independent of the proponent, have the necessary scientific rigour and be transparent to the local community. We support baseline surveys so effects to the environment can be monitored and ongoing drone footage such as happening at the Bribie Island project to keep the community informed of what is happening in real time.

GCCN recommends that all environmental monitoring data collected during construction and operation be publicly available through a transparent online reporting platform such as provided by the Gippsland New Energy website. This will assist in maintaining community confidence and enable independent scientific review.

We support the establishment of an independent, preferably locally based, ombudsman or community liaison function to provide a trusted and accessible mechanism for addressing community concerns throughout the life of the project. Such a role would enable issues to be raised, investigated and resolved in a timely and transparent manner, helping to build trust between proponents, government and the community. It would also provide an alternative pathway for dispute resolution, reducing the need for costly and time-consuming legal processes while ensuring that local voices are heard and respected.

We also believe that governments have an important role to play in supporting community participation throughout the energy transition. Community members are volunteers with busy lives and need support in order that they can properly engage in this process. The responsibility for maintaining this social licence should not rest solely with project proponents. Independent funding should be made available to support community engagement activities, public forums, independent research, educational initiatives, student outreach programs and other opportunities that enable communities to access information, participate in decision-making and contribute constructively to discussions about the future of the region. It should not just happen because of the proponents goodwill.

A well-informed and engaged community is essential to achieving durable social licence and ensuring that the benefits and challenges of major infrastructure projects are understood, debated and managed transparently.

We believe local Governments need to be supported to develop community facilities in line with a new workforce. Schools, roads, health services and community sports facilities are essential parts of a growing community impacted by the offshore wind workforce.

Community benefit schemes or the rates of others should not be used for this essential infrastructure but an independent funding mechanism be provided so that local communities can grow properly. Creating temporary housing and flying in workers does not create community harmony. We believe it's more than building infrastructure it's about building communities.

Conclusion

GCCN Board believes the Star of the South project represents a significant opportunity for Gippsland to contribute to Australia's energy transition while creating long-term economic, workforce and community benefits for the region.

We support the project proceeding, subject to rigorous environmental safeguards, transparent governance arrangements, meaningful community engagement and strong commitments to local participation and benefit sharing.

If delivered responsibly, the project has the potential to become a nationally significant example of how large-scale renewable energy infrastructure can coexist with thriving regional communities, productive industries and a healthy marine environment.

GCCN looks forward to continuing to work with governments, industry, Traditional Owners and local communities to ensure that Gippsland captures the full benefits of the offshore wind opportunity while protecting the environmental and social values that make our region unique.

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