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Subject: Star of the South Offshore Wind Farm Project: Federal Draft EIS
Attachments: SUBMISSION - Star of the South Offshore Wind Farm.pdf

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Attention: Project Assessment Panel

Please accept this email as my submission regarding the Star of the South project. I am lodging my submission via email as the online submission portal repeatedly encountered technical errors and blocked my online attempts.

Please acknowledge receipt of this submission

Regards
Sharon Dohnt

[REDACTED]

E: [REDACTED]
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The Department of Climate Change, Energy, the Environment and Water (DCCEEW)
Re: Objection to the Star of the South Offshore Wind Farm Project (EPBC 2020/8650)
Att: EIS Assessment Panel

Cumulative and Under-assessed Impacts on the White-throated Needletail (*Hirundapus caudacutus*)

1. Inadequate Assessment of Cumulative Impacts

The proponent's technical report notes a significant lack of baseline data regarding the combined effects of the Star of the South project and the adjacent, onshore Gelliondale Wind Farm (EPBC 2023/09577). Despite this self-admitted data deficiency, the report speculates that impacts to the White-throated Needletail would be "*less than natural deaths from other sources*". This conclusion lacks scientific basis and fails to apply the precautionary principle required under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

2. Direct Evidence of High Regional Species Density

The proponent's assumption of low impact is entirely contradicted by empirical baseline data from the immediate locality. *The Gelliondale Wind Farm Flora and Fauna Assessment (2025)* No. 14107.22 (4.4) states:

"A total of 45 detections during the targeted surveys resulted in 1,066 cumulative counts, with a median of six individuals per detection, ranging from single birds to flocks of up to 160."

The White-throated Needletail is listed as Vulnerable and Migratory under the EPBC Act. A localised count of 1,066 individuals over just four survey periods indicates that the South Gippsland coastal corridor serves as a highly significant foraging zone during their non-breeding season.

3. The Cumulative Barrier Effect

White-throated Needletails are almost exclusively aerial, feeding on swarming insects lifted by coastal weather fronts, thermal currents, and sea breezes. Placing the Star of the South offshore array alongside the onshore Gelliondale array creates a contiguous dual layered collision barrier along the coast:

- Birds utilising coastal wind fronts will face an operational gauntlet.
- If they successfully navigate offshore turbines, they fly directly into the path of onshore blades (or vice versa).
- This regional 'double whammy' effect exponentially increases the collision risk profile beyond what has been assessed in isolation.

4. Methodological Flaws in the Proponents Risk Baseline

The proponent's technical report cites Hull *et al* (2013) and Tarburton (2009) to frame collision risks to the White-throated Needletail as historically minimal. However, the proponent omits critical peer-reviewed updates from the same researchers that invalidate those conclusions.

Tarburton (2021) *Recent increase in knowledge about numbers and flight behaviour in the White-throated Needletail*, published in Australian Field Ornithology critiques Hull's methodology datasets, noting significant under recording:

- **Seasonal Mismatch:** Tarburton (2021) establishes that if the field research in Spring and Autumn underpinning Hull's dataset had been conducted intensively during peak summer, the recorded carcass counts would have been significantly higher. Conducting baseline searches outside of the peak summer foraging windows creates a false negative.
- **Unidentified Evidence** ('Feather Spots'): Carcass monitoring relies heavily on finding intact bodies, and birds are highly vulnerable to rapid removal. More than half are taken by scavengers within the first 24 hours and in many cases, they are consumed entirely leaving no feather spots or clues behind.

Tarburton (2021) highlights that 96 feather spots recorded in Hull's historical datasets could not be conclusively identified. He states that many more White-throated Needletails would have been accounted for if identification of those feather spots had been technically viable at the time.

In addition, Tarburton (2021) notes Hull's research also showed that the White-throated Needletail was one of the two main species being killed in Tasmania; an area that has few White-throated Needletails compared to Queensland, New South Wales and Victoria.

5. Empirical Proof of Human Failure to Detect Needletails

The proponent's claim that they lack data to determine regional risk is now an outdated defence mechanism entirely invalidated by a landmark study published in Australian Field Ornithology (April 2026) by Reid *et al*.

The study, funded by DCCEEW and conducted at an operational Tasmanian wind farm, utilised the automated identiFlight tracking system. The findings provide a warning for the Star of the South project:

- **Complete Human Blindness:** Prior to the trial, human observers conducted two years of seasonal bird monitoring at the Tasmanian site and recorded zero White-throated Needletails.
- **Significant Detection:** Once the automated identiFlight system was activated, it recorded 2,982 distinct tracks of White-throated Needletails passing directly through the operational turbine zone over a multi-year period.
- **High Density Gauntlets:** The 2026 study proved that when White-throated Needletails arrive, they move in highly concentrated spikes - with most detections compressed into February and March. On days when they were present, multiple birds swarmed the site continuously, with a median of just 4 minutes between consecutive turbine zone entries.

The Reid *et al.* (2026) study proves that a lack of baseline carcass or visual data does not mean birds are absent; rather, it proves that human led preconstruction surveys are mathematically incapable of detecting them. Given that the nearby Gelliondale project managed to catch 1066 Needletails in just four survey periods using basic human observations, the actual density of birds moving through this South Gippsland corridor is likely exponentially higher than the proponent has admitted.

6. National Contribution to Global Population Decline

The proponent frames the Star of the South project as a localised risk. However, Tarburton (2021) clearly elevates the cumulative impact of Australian wind energy infrastructure to a matter of global population survival. He warns:

“More recently, however, the possibility that Australia is now contributing to the decline of the White-throated Needletail as a result of the type of wind turbines being used to generate electricity has been realised.”

Historically, population declines in this migratory species were primarily attributed to habitat loss in their northern hemisphere breeding grounds. Tarburton’s peer reviewed finding confirms that mortality events occurring within Australia - driven by rapidly expanding coastal wind developments - are now actively contributing to the downward trajectory of the species. Yamaguchi *et al.* (2021) confirms that the movements of these birds while in Australia place them in almost constant danger from these existing and proposed wind farms.

7. Local Industry Recognition of Ongoing Mortality

The reality of this decline is openly acknowledged within the local wind industries own environmental assessments. The Gelliondale Flora and Fauna Assessment states:

“The White-throated Needletail has been recorded colliding with wind turbines at several south-eastern Australian wind farms in recent years...”

This admission by a neighbouring proponent completely invalidates any claim by the Star of the South that collision risks to this species are speculative or negligible. The neighbouring project openly documents that Australian wind farms are actively killing White-throated Needletails. Introducing a massive offshore array immediately adjacent to an onshore site where 1066 birds were recorded creates a significant, compounding threat zone.

8. Statutory Failure Under the EPBC Act

As a signatory to international migratory bird agreements (JAMBA, CAMBA, and ROKAMBA), Australia is legally bound to protect the White-throated Needletail. Under the Department’s own *Significant Impact Guidelines 1.1*, an action is prohibited if it will “*disrupt the lifecycle of an ecologically significant proportion of the population*” or “*decrease the size of an important population.*”

The proponent is proposing an action that directly compounds the exact national decline identified by Tarburton (2021). The Department cannot logistically or legally approve a project that knowingly accelerates the domestic extinction trajectory of an internationally protected migratory species.

9. Conclusion and Requested Action

The proponent cannot legally dismiss cumulative impacts as low when neighbouring technical data proves the target area supports significant numbers of an EPBC listed vulnerable species, and modern AI tracking data proves human observers miss thousands of birds.

The EIS fails to justify the close proximity of the proposed turbine array to a globally significant Ramsar boundary and migratory avian pathways. In established international offshore wind jurisdictions, large scale projects are routinely situated 50 to 60 kilometres offshore within their respective Exclusive Economic Zones (EEZ). Siting turbines a mere 10km from the coast and directly adjacent to Ramsar wetlands and the approved Gelliondale onshore wind farm strips threatened species of their natural avoidance zones.

I request that the Department:

1. Evaluate alternative, deeper water layouts further out in the Commonwealth EEZ that utilise floating technology aligning Australia with international ecological safety standards.

2. Reject the current cumulative impact assessment as deficient and scientifically flawed.
3. Order a unified, independent collision risk model that integrates the operational data, turbine heights, and rotor swept areas of both the Star of the South and Gelliondale wind farms.
4. Discount any risk assessments in the referral that rely on Hull *et al* (2013) unless the data is remodelled to statistically account for seasonal and carcass identification biases.
5. Mandate automated, curtailment technology capable of tracking high velocity avian flocks in real time across the regional turbine network to stop blades instantly when White-throated Needletail flock's approach.