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Star Of The South Windfarm Environmental Impact Statement (EIS)

Submission from Seafood Industry Victoria on
risk to commercial fishing

June, 2026

Victoria's seafood industry

Seafood Industry Victoria (SIV) is the peak body for Victorian commercial fishing licence holders with a broad membership from across the seafood supply chain. SIV was founded in 1989 by professional fishers and fish processors to build and inform a united, ecologically sustainable and thriving industry valued by the Victorian community.

SIV is focused on ensuring the Victorian public can continue to benefit from ongoing access to seafood harvested sustainably. A 2021 study found that most Victorians consume seafood regularly, with many preferring local seafood products based on perceptions of them being fresher and of higher quality¹. Furthermore, locally caught seafood in regional communities is valued by international and domestic visitors who view seafood as an integral part of the coastal travel experience. Most Victorian seafood wholesalers, processors and retailers say that demand for local seafood is growing¹.

A recent review of relevant and high-quality scientific health studies concluded that a healthy diet should include consumption of at least two serves of seafood per week². A variety of seafood should be consumed to gain optimal health benefits across all stages of life. Local seafood has also been shown to be a low carbon footprint form of protein with emissions per kilogram of production well below that of alternatives such as beef and lamb³.

With most of professional fishing's economic contribution to Victoria occurring outside the major urban cities of Melbourne and Geelong, the seafood industry is a cornerstone of regional coastal economies where it creates significant employment opportunities⁴. The seafood industry requires diverse and often high-level skills but also provides entry-level jobs for people who might otherwise find it difficult to secure employment.

SIV holds the view that responsibly harvested seafood is an essential contributor to food security for the region. Disruptions to reliable supply of seafood produced in Victoria leads to an increased presence of imported product, often with reduced traceability or evidence of sustainable fishing practices. We believe the Australian Government has a responsibility to protect Victoria's valuable seafood industry and the communities it helps support; therefore, every effort should be made to avoid negative impacts on the sector.

Impacts of offshore wind turbines on the marine environment are primarily in the construction and operation phases⁵. Commercial fishing businesses in Victoria hold two key areas of concern regarding these phases for offshore wind projects proposed for the area off the coast of Gippsland- risk to resource access for their businesses, and risk to populations of commercially important species.

¹ Valuing Victoria's Wild-Catch Fishing and Aquaculture Industries: measuring the economic and social contributions (2021). University of Technology Sydney.

² Hunt and McManus (2025) The health benefits of eating seafood: Evidence based science. Murdoch University and Curtin University.

³ Energy use and carbon emissions assessments in the Australian fishing and aquaculture sectors: Audit, self-assessment and guidance tools for footprint reduction (2021). Fisheries Research and Development Corporation, Project 2020-089.

⁴ Skills and Workforce Analysis for Seafood Industry Victoria (2021). Ternes Scientific.

⁵ Wang et al. (2024). Remote sensing unveils the explosive growth of global offshore wind turbines. Renewable and Sustainable Energy Reviews.

Risk to resource access for commercial fishing businesses

Licence holders for Victorian state managed fisheries report their entire catch (including by-catch) to the government regulator and have an active monitoring system that continuously tracks the location of their vessels. Victorian managed fisheries with reported catch history (for the period 2001 – 2021) within the Star Of The South (SOTS) wind farm feasibility licence area (project area) are listed in Table 1.

It is important to note that this report considers Victorian managed fisheries only and does not reference Commonwealth managed fisheries. Both jurisdictions need to be factored to inform a holistic view of total risk to productivity of commercial fishing offshore of Victoria and flow on effects for the broader seafood industry.

Baseline marine surveys in the project area observed several fish species important to Victorian fisheries, including shark (abundant), flathead (abundant), snapper, wrasse, morwong, trevally, flounder, mackerel and whiting. Surveys also observed rock lobster, octopus, squid and scallops, however the accuracy of relative abundance data could be improved by broadening the survey techniques used.

Risk to resource access during wind farm construction

Any reduction of, or limitations to fishing activity will impact the economic viability of commercial fisheries and people's livelihoods through lower catch yields^{6,7}. The proponent states in the EIS that regardless of prospects for longer term co-existence, all non-project vessels will be prohibited from accessing areas during the construction process.

The EIS cites overlap between the project area and historical commercial fishing catch data to assess relative risk posed by their project to individual fisheries. This method fails to acknowledge that historical fishing activity is not necessarily an indicator of future importance of an area to sustaining a fishery due to factors such as climate change shifting the distribution of target species⁸. Furthermore, commercial fishing entitlement holders that are forced to shift their fishing activity during construction, or change route to fishing grounds, will incur costs associated with fuel, staff hours and time to market⁹.

Based on the above considerations, the negligible-moderate consequence levels assumed in the EIS regarding loss of fishing ground, loss of catch and loss of prospectivity during construction require review and revision. Any change to the consequence rating for factors associated with productivity will inevitably elevate risk for operating costs, competition in other areas and decreased licence/quota value.

⁶ Roach et al. (2022). Co-existence in practice: a collaborative study of the effects of the Westernmost Rough offshore wind development on the size distribution and catch rates of a commercially important lobster (*Homarus gammarus*) population. ICES Journal of Marine Science, 79: 1175–1186.

⁷ Roach et al. (2018). The effects of temporary exclusion of activity due to wind farm construction on a lobster (*Homarus gammarus*) fishery suggests a potential management approach. ICES Journal of Marine Science, 75: 1416–1426.

⁸ Fulton et al. (2024). Modelling perspective on the climate footprint in southeast Australian marine waters and its fisheries. ICES Journal of Marine Science, 81(1): 130–144

⁹ Chaji, M and Werner, S. (2023). Economic Impacts of Offshore Wind Farms on Fishing Industries: Perspectives, Methods, and Knowledge Gaps. Marine and Coastal Fisheries, Volume 15.

Table 1: Victorian managed State fisheries with catch history that overlaps the feasibility licence area for the proposed SOTS windfarm.

Fishery	Licences	Description
Rock Lobster (Eastern Zone)	32	The Victorian Rock Lobster (Eastern Zone) Fishery is a quota managed fishery that operates between Apollo Bay and the Victoria / New South Wales border. Southern Rock Lobster are caught via commercial pots that are 'set' into the ocean. The current harvest strategy is designed to achieve a rebuild of stocks over time, with allowable catch determined by stock assessments that consider estimated egg production, recruitment of juveniles and total lobster biomass ¹⁰ .
Scallop (Ocean)	88	The Victorian Scallop (Ocean) Fishery harvests Commercial Scallops found on sandy and muddy seabeds. Fishing is undertaken using specialised scallop dredges towed behind fishing vessels. Surveys and stock assessments are used to identify viable fishing grounds and determine sustainable catch levels. Minimum legal-size requirements ensure scallops have an opportunity to reproduce before capture.
Wrasse (Ocean)	22	The Wrasse (Ocean) Fishery operates along Victoria's coastal waters out to 20 nautical miles offshore. Fish are generally harvested through low impact methods such as hook-and-line or baited traps. The fishery focuses on providing small catch volumes to high-value live fish markets. Its management framework aims to balance commercial opportunities with the long-term health of wrasse populations.
Octopus (Eastern Zone & Central Zone)	11	The Victorian Octopus (Eastern Zone) Fishery is a specialised, quota-managed commercial fishery that primarily targets the Pale Octopus using low impact purpose-built unbaited shelter pots. High demand for Victorian-caught octopus has resulted in a valuable boutique fishery. The Central Zone is currently managed under temporary permits to gather data that will inform establishment of that fishery. Research is improving the understanding of octopus population dynamics and stock sustainability.
Trawl (Inshore)	54	The Victorian Trawl (Inshore) Fishery is a small-scale commercial trawl fishery operating primarily within Bass Strait and adjacent inshore areas. It is a multi-species fishery that contributes to regional food supply chains, including catch of King Prawns that are highly valued by Gippsland locals and tourists visiting the region. Spatial controls, trip limits and gear restrictions maintain sustainable harvests while protecting sensitive habitats.
Ocean (General)	74	The Victorian Ocean Fishery operates in marine waters outside bays and inlets. It is one of the states key multi-species fisheries and provides access to a diverse suite of offshore finfish and shark species. The fishery has a capped number of licences and species-specific trip limits. Catch depends on seasonal availability, resulting in a variety of wild-caught seafood being provided to local retailers and hospitality venues.
Purse Seine (Ocean)	1	The Victorian Purse Seine (Ocean) Fishery operates out of Lakes Entrance using encircling net technology to harvest schooling pelagic fish species such as sardines, anchovies and mackerel. The gear operates in midwater meaning it does not contact the seabed. The fishery is managed through controls on access, catch, and fishable areas to maintain sustainability.

¹⁰ Victorian Rock Lobster Fishery Management Plan 2023 (draft)

Risk to resource access during wind farm operation

The proponent acknowledges that some commercial fishing businesses will not be able to continue using 'restrictive methods' of fishing within an operational wind farm (e.g. gillnet, octopus mainline and purse-seine). The design of vessels and gear types within those fisheries are highly specific to the target species. Regardless of whether Victorian commercial fishing businesses that use that gear are currently accessing the project area, the introduction of wind farm infrastructure will limit their future ability to shift effort in response to changes in the natural distribution of target species^{11, 12}. The indefinite reduction in prospective fishing grounds available to them will have a detrimental impact on the value of their fishing entitlements and businesses.

Commercial fishing operations that use 'non-restrictive methods' may technically be permitted to undertake operations in the project area, however; it may not be safe or feasible for them to do so. The interaction between the pillar of a wind turbine and tidal currents makes hydrodynamic factors more complicated than in an undisturbed habitat¹³. The proponent describes Bass Strait as a 'high-energy environment frequently exposed to storms and significant wave heights'. It is reasonable to assume that introducing wind turbines into a highly dynamic ocean setting will enhance risk for commercial fishing vessels moving at speed or deploying / operating / retrieving fishing gear. Potential interactions between wind turbines and fishing vessels may pose an unacceptable safety risk or result in difficulties obtaining affordable insurance¹⁴.

The proponent offers two methods for mitigating impacts to fishing businesses - compensation and work opportunities on the wind farm project. Neither are legitimate methods for mitigating risk, but rather ideas to offset impacts that are built on several assumptions, including that fishers can (or will want to) take up employment in another industry under different work conditions. Furthermore, neither form of mitigation addresses flow on effects of reduced commercial catches to other businesses in the seafood supply chain. A portion of the 600+ supply chain jobs created through processing of seafood across more than 150 Victorian licensed facilities¹⁵ will be at risk, including positions within local Gippsland businesses such as fishing cooperatives, fresh seafood retailers, fish & chip shops and restaurants.

Based on the above points, the negligible-moderate consequence ratings assumed in the EIS in regard to loss of fishing ground, loss of catch and loss of prospectivity should be elevated, or at the very least further reviewed. Any change to the consequence rating for factors associated with productivity will inevitably add risk to operating costs, competition in other areas and decreased licence/quota value.

¹¹ Fulton et al. (2024). Modelling perspective on the climate footprint in southeast Australian marine waters and its fisheries. ICES Journal of Marine Science, 81(1): 130–144

¹² Maltby et al. (2023). Barriers and enablers of climate adaptation in fisheries: insights from Northeast US fishing communities. Marine Policy 147: 105-331

¹³ Cai et al. (2023). Study on the Impact of Offshore Wind Farms on Surrounding Water Environment in the Yangtze Estuary Based on Remote Sensing. Remote Sensing, 15: 5347

¹⁴ Hall, D.M. and Lazarus, E.D. (2015). Deep waters: Lessons from community meetings about offshore wind resource development in the US. Marine Policy, 57: 9-17.

¹⁵ Skills and Workforce Analysis for Seafood Industry Victoria, Ternes Scientific, 2023

Risk to populations of commercially important species

The proponent has determined that reduced availability of fish due to habitat modification during operation of a wind farm in the project area would be negligible-minor, as effects would be highly localised and limited to the behaviour of individual fish. That conclusion does not adequately consider the likelihood that introducing significant infrastructure to a marine environment will change ocean dynamics and impact the surrounding ecosystem, including populations with ecological and commercial significance.

A 2022 review of published studies, international examples and impact reports identified an extensive list of potential impacts of offshore wind infrastructure to marine environments¹⁶. Although the long-term impacts on commercially important species in the area are not entirely clear, there is enough evidence to conclude a change is inevitable¹⁷.

Risk to wild seafood stocks during wind farm construction

Commercial fishers are concerned about pile driving during construction resulting in noise impacts on species of high ecological and commercial significance. Pile-driving noise is broadband, and sound exposure level can reach 210 underwater decibels¹⁸. Impacts of noise on marine fauna is often species specific, requiring research to determine likely impacts on local populations.

The proponent assumes a negligible impact of pile driving noise on marine species in the area, despite their analyses determining that bony fish within 670 metres could experience injury and that benthic fish, invertebrate species and plankton (including eggs and larvae) may not have the ability to move away from noise disturbance. These findings do not correlate with the proponents negligible-minor consequence rating for commercial fishing in their underwater noise risk assessment.

Risk to wild seafood stocks during wind farm operation

The proponent mentions the potential for introduced infrastructure to have an 'artificial reef effect' resulting in greater abundance of fish species targeted by commercial and recreational fisheries. They have assumed that ecosystem level changes will benefit fisheries without acknowledging that colonisation by flora and fauna species may increase predators to the area and result in localised depletion of commercially important species. This effect could be significant in magnitude given the scale of artificial infrastructure being introduced to an area of primarily soft sediment substrate (~90% coverage). On this basis, a negligible-minor initial consequence rating within the proponent's habitat change risk assessment needs to be reviewed.

¹⁶ Southern Winds Offshore Wind Project – Summary of Impacts (2022). Umwelt Consulting.

¹⁷ Daewel et al. (2022). Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea. Communications Earth & Environment.

¹⁸ Kikuchi (2010). Risk formulation for the sonic effects of offshore wind farms on fish in the EU region. Marine Pollution Bulletin, 60: 172-177

Of particular concern is the possible interaction between electromagnetic fields (EMF's) associated with offshore electricity production and physiological and/or behavioural characteristics of marine fauna. This can occur regardless of whether electric cables are buried. For example, EMF exposure on the 'Edible Crab' (a commercially important species in the Northern Hemisphere), disrupted the crab's circadian rhythm, affected their movement, and altered total haemocyte count. EMF's significantly reduced the time that crabs spent 'roaming', holding implications for the overall health of the population and commercial fishing yields from established fishing grounds¹⁹.

The connection between the EMF effects from offshore wind infrastructure, species ecology, the likely encounter rate and other factors is complex²⁰. At present little is known regarding potential impacts to magneto-receptive and electro-receptive species in Bass Strait and surrounding areas that rely on natural EMF's during their life-cycle. Understanding the specific dose-response EMF effects on commercially relevant species within the proposed project area is required before a negligible-minor consequence rating within proponent's EMF risk assessment could be considered valid.

Conclusion

Whilst Victoria's seafood industry has faced several challenges, it continues to be an important sector that contributes fresh responsibly sourced food, provides employment opportunities, and plays an integral part in the tapestry of coastal communities. The Australian and Victorian Governments have a responsibility to protect Victoria's seafood industry and the communities it helps support; therefore, every effort should be made to avoid negative impacts on the sector.

Any reduction of, or limitations to fishing activity will impact the economic viability of commercial fisheries and people's livelihoods through lower catch yields and a reduced potential for future discoveries of fishing grounds i.e., limiting the industry's potential for climate change adaption. Limitations to future productivity of the seafood sector will have wide reaching socio-economic implications for the diversity and resilience of regional communities. Further, disruptions to reliable supply of seafood produced in Victoria will likely lead to an increased reliance on imported product, often with reduced traceability or evidence of sustainable fishing practices.

The introduction of offshore wind infrastructure to the marine environment offshore of Gippsland will result in a change to ocean dynamics, impacting the surrounding ecosystem and therefore species populations with ecological and commercial significance. There is particular concern regarding the likely effects of electromagnetic fields on important ecological cues for magneto-receptive and electro-receptive species, including fish and crustacea.

¹⁹ Scott, et al. (2028). Understanding the effects of electromagnetic field emissions from Marine Renewable Energy Devices (MREDs) on the commercially important edible crab, *Cancer pagurus* (L.). Marine Pollution Bulletin, 131: 580-588

²⁰ Hutchison, et al. (2020). The interaction between resource species and electro-magnetic fields associated with electricity production by offshore wind farms. Oceanography 33(4): 96–107.

The environmental risk assessments presented in the EIS do not adequately consider:

Risk to resource access for commercial fishing businesses

- By focusing on current effort rather than future opportunity, the EIS underestimates potential long-term impacts on commercial fisheries and licence/quota values, particularly when considering potential distribution changes for target species.
- The ability of various fishing vessels to operate safely within turbine arrays or over buried cables may be compromised, resulting in avoidance of those fishing grounds or higher insurance rates.
- Commercial fishers may not be able, or be willing to, offset financial impacts to their businesses by taking up employment opportunities within the offshore energy sector.
- Any limitations to productivity of commercial fisheries will have broader flow on effects for other businesses in the seafood supply chain.

Risk to populations of commercially important species

- Commercial fishers can experience substantial economic losses, even where total stock biomass remains unchanged, due to disturbances in behaviour of fish impacting their 'catchability' at a local level.
- Benthic fish, invertebrate species and plankton (including eggs and larvae) may not have the ability to move away and avoid injury caused by underwater noise during construction.
- Colonisation of underwater infrastructure by flora and fauna species may change ecosystem dynamics to the detriment of commercially important species, e.g. increase of predator species to the area.
- Species specific dose-response effects of electro-magnetic fields on magneto-receptive and electro-receptive marine species in the region are currently unknown.

Seafood Industry Victoria does not believe that the assessments presented within the EIS adequately capture risk levels to Victorian managed commercial fisheries permitted to operate offshore of Gippsland. On that basis, risk levels should not be considered as acceptable or meeting the assessment criteria in their current form.

For more information on the contents of this submission, please contact:

Seafood Industry Victoria

