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Australian Conservation Foundation

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Australian Conservation Foundation

Submission to: Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) – EPBC Act assessment of the Star of the South Offshore Wind Project (Commonwealth EIS)

Addressed to: The Commonwealth Minister for the Environment (or delegate), via DCCEEW

Submission from: Australian Conservation Foundation

Level 1, 60 Leicester Street, Carlton VIC 3053.

Contact details:



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About the Australian Conservation Foundation

The Australian Conservation Foundation is Australia's national environment organisation. Since 1965, we've protected the nature we all love – our unique wildlife and our beautiful beaches and bush.

Driven by the power of people, we won World Heritage listing for the Great Barrier Reef and Kakadu National Park, and returned precious water to the rivers of the Murray-Darling.

We influence governments and businesses to protect the animals, rivers and reefs close to our hearts and hold decision-makers to account without fear or favour. Everything we do is evidence-based and helps nature and people thrive for generations to come.

We won't give up until Australia's nature is protected and regenerated.

The Australian Conservation Foundation acknowledges that First Nations Peoples of Australia hold unique knowledge and rights inherited from their ancestors and Country and have cared for this country since time immemorial. We pay our respect to First Nations Peoples of Australia, past, present and future. We respect their leadership in caring for Country and support their rights to continue to do so. We recognise that sovereignty was never ceded, and that colonisation was unjust, often violent and continues to adversely impact on First Nations Peoples today. As Australia's national environment organisation, we understand we have a responsibility to help right this historical wrong. We support their authority to speak for Country, right to self-determination and recognise that rightful recognition of and genuine reconciliation with First Nations Peoples is fundamental to protecting nature in Australia. We support First Nations-led campaigns that protect Country and seek win-win outcomes for our environment and for the rights, wellbeing and advancement of First Nations Peoples

To find out more about the Australian Conservation Foundation's work visit www.acf.org.au



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Introduction

The Australian Conservation Foundation (ACF) strongly supports Australia's rapid transition to renewable energy and recognises the important role offshore wind can play in decarbonising Australia's energy system and powering green exports, particularly as aging coal-fired power plants, like those in Gippsland Victoria, near retirement.

Gippsland is uniquely placed to host Australia's first offshore wind generation infrastructure because it has an exceptional wind resource in areas of relatively shallow offshore waters that can support the early deployment of fixed bottom offshore wind turbines. The region also has a proud history of powering Victoria, combining a strong industrial and energy workforce with established port and maritime capability and proximity to major electricity infrastructure and energy demand in south-eastern Australia.

However, offshore wind development, like all renewable energy, must be good for nature and people. This means it must be planned, operated and decommissioned to avoid significant impacts on biodiversity, particularly Matters of National Environmental Significance (MNES) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

This submission responds to key issues raised in the EIS summary and conclusion, with particular focus on the Shy Albatross (*Thalassarche cauta*). The EIS identifies Shy Albatross as the only EPBC listed threatened and migratory seabird for which collision risk remains above "low" following design changes (including welcome increase of turbine air gap to 35 m). The EIS reports a worst-case estimated Shy Albatross collision rate of 4.31 collisions per year and assesses collision risk for the species as "medium" due to the species' endangered status and sensitivity to reductions in adult survival. This is concerning.

The current EIS concludes that, with the implementation of the proposed mitigation measures, the project will not have a significant impact on MNES. This outcome relies heavily on future plans and adaptive management commitments that are not yet specified with sufficient enforceable detail to demonstrate impacts will not be significant for Shy Albatross. ACF therefore makes the below recommendations to better align the project with the precautionary principle and help ensure offshore wind proceeds with stronger safeguards for nature while generating essential renewable energy.



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Recommendations

Recommendation 1:

Require installation of offshore video and radar-based bird detection and monitoring systems capable of distinguishing birds to the genus and, where possible, species level.

Recommendation 2:

Require the project to be future-ready to implement existing and emerging active turbine curtailment technologies, supported by an adaptive management framework, that can minimize collision risk for Shy Albatross, and other high-risk species.

Body of submission

Overall position

ACF strongly supports the development of offshore wind off the Gippsland coast, and recognises that Star of the South is likely to be the first of many projects to follow. As such, it will set an important precedent regionally and nationally.

Any approval under the EPBC Act must include specific conditions to avoid unacceptable impacts on threatened and migratory species. This submission focuses on the Shy Albatross as an EPBC-listed priority species requiring stronger safeguards.

Shy Albatross collision risk

The EIS identifies Shy Albatross as the only EPBC-listed threatened and migratory seabird for which collision risk remains medium after design changes, including the welcome increased turbine air gap. The EIS also reports a worst-case estimate of 4.31 collisions per year. For a long-lived seabird with low reproductive output, even relatively small increases in adult mortality may be significant.

ACF submits the Species Management Plan should adopt an adaptive management framework that requires the implementation of existing and emerging species-specific active collision mitigation measures where monitoring identifies unacceptable impacts. This should include provision for turbine curtailment informed by video and radar-based detection systems, as well as other proven technologies as they become available.

The wind farm should be designed from the outset to accommodate these technologies, ensuring they can be deployed rapidly if monitoring demonstrates that mortality thresholds or permit limits for albatross 'take' are exceeded. Building this capability into the project from the beginning will avoid costly retrofits, enable a timely management response, and improve confidence that impacts can be reduced to acceptable levels throughout the life of the project. Guidance on best practice curtailment can be found in [Bird Curtailment in Offshore Wind Farms: Application of curtailment in offshore wind farms at a sea basin level to mitigate collision risk for birds](#).



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Conclusion

ACF strongly supports the establishment of offshore wind in Gippsland and recognises the precedent setting role of the Star of the South project in Australia's clean energy transition. However, approval should be conditional on a Species Management Plan that incorporates an adaptive management framework and provides for the implementation of existing and emerging turbine curtailment technologies to reduce collision risk for Shy Albatross. This should include ensuring the project is designed from the outset to accommodate future video-, radar-based and other proven detection and curtailment systems, allowing these measures to be deployed rapidly if monitoring indicates they are required to avoid or minimise impacts and ensure compliance with approval conditions.

Star of the South Offshore Wind Project – Commonwealth Environmental Impact Statement (EIS), Chapter 24: EIS summary and conclusions (as exhibited).

Machado, R., Nabo, P., Cardia, P., Moreira, P., Nicolau, P., & Repas-Goncalves, M. (2024). Bird Curtailment in Offshore Wind Farms: Application of curtailment in offshore wind farms at a sea basin level to mitigate collision risk for birds. Birdlife Europe and Central Asia and STRIX, Brussels, Belgium. DOI: 10.5281/zenodo.112



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