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Humane World for Animals Australia

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29 June 2026

Star of the South
310 Commercial Road, Yarram
Email: info@southerlyten.com.au

Dear Star of the South Environment and Approvals Team,

RE: Star of the South's draft Environmental Impact Statement

Humane World for Animals welcomes the opportunity to provide comment on the draft Commonwealth Environmental Impact Statement (EIS) to seek approval for Star of the South under Australia's national environmental law.

For over 70 years, Humane World for Animals (formerly Humane Society International) has been a leader in the animal protection movement working to create a better world for animals. We envision an ecologically sustainable and humane world where people treat animals and nature with respect and compassion.

We recognise the vital importance of an efficient transition away from fossil fuels in Australia's energy infrastructure, however with any development comes impact. The effort and attention paid in the application to the environmental impacts of this project as well as the effort invested now and into the future in mitigating that impact is necessary, fundamental and required under our federal legislation.

The comments provided here will be limited to seabirds in the Order Procellariiformes, (and to a lesser extent, Charadriiformes), as albatross and petrels are a priority focus for our organisation in Australia. With 84 EPBC-listed species in the taxon, a conservation crisis has been declared for this group of birds by the Agreement on the Conservation of Albatross and Petrels (ACAP) at the 11th Meeting of the Advisory Committee in 2019. At the most recent Advisory Committee (AC15) meeting held in June 2026, it was acknowledged that this conservation crisis is ongoing. Of these 84 species, we note that 29 are EPBC-listed as threatened, with 19 Vulnerable, 9 Endangered, and 1 Critically Endangered, with many of these and more listed under the International Union for the Conservation of Nature (IUCN) Red List. The viabilities of these threatened populations are so fragile, that the loss of only a few individuals can have drastic impacts. The arrival of H5N1 to Australian shores deepens our concern.



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Furthermore, concern is again exacerbated by significant knowledge gaps. As stated in the *Draft EPBC Act information on albatross and petrels for offshore wind farms* produced by DCCEEW under the Renewable Energy Research Initiative (RERI), because "...no offshore wind farms currently operate in the Southern Hemisphere, there are limited examples of how Procellariiformes will react to, or be impacted by, wind farm development." Further, Procellariiformes are cosmopolitan and unpredictable in their foraging distribution which means the location of Declared areas do not offer any mitigation for potential impacts. For these reasons, application of the precautionary principle must be paramount.

Impact avoidance

The EPBC Act requires proponents to avoid impact risks as the first step in the mitigation hierarchy. Humane World is concerned that Star of the South is not planning to exhaust all available mitigation strategies.

It is concerning to us, that without exception, every separate assessment chapter, including those concerning Procellariiformes, concludes that the "...impacts and risks are acceptable and meet the assessment criteria and respective EIS guidelines." At the very least there should be qualifiers in the above statement that indicate the uncertainty of the magnitude of impacts. Definitive statements in the light of uncertainty disregard important opportunities to mitigate harm as much as possible.

We are also concerned by the statements, "...collision rates would be no greater than natural mortality rates and would therefore have no impact on population viability", and "...unlikely to have a significant impact on seabirds, shorebirds and Bass Strait migrants." These are entirely theoretical assessments which misunderstand the nature of additional human induced mortality on wild animal populations. Wind farm infrastructure introduces a brand-new threat into procellariiform habitat – whatever causes of natural or other human induced mortality existed prior to the presence of a wind farm, will still exist in the environment during the construction, operation and decommissioning of the project. Mortality from windfarm impacts is not to be compared to natural mortality but rather added to it. Further, if these theoretical assessments happen to be inaccurate, and there is significant impacts to Procellariiformes, the impacts will persist with little prospect for mitigation or remediation. Multiple EPBC and IUCN-listed species could experience impact at levels of conservation concern, with limited capability for wind farm operators to respond.

The population-level impact on shy albatross (*Thalassarche cauta*), the species of highest concern, under a worst-case scenario, is estimated at 4.31 collisions per year. That removal rate from a Pedra Branca population of just 200 birds, has realistic potential to be a more than significant impact. As such, for all species, even such low theoretical collision frequencies must, as the EPBC Act states, be avoided, because individual species' and population-level uncertainties cannot possibly be resolved until it is too late to avoid and or mitigate the impact.

We believe there is an insufficient commitment to impact avoidance resulting in too many impact uncertainties. As such, we cannot accept a favourable assessment for seabirds. We are encouraged by the commitment to a safer minimum air gap of 35m as this is an excellent impact avoidance strategy. However, if additional measures of similar potential benefit were implemented, further impact risk reduction would result. As such, we recommend consideration and adoption of the following measures to avoid impact:

Motion smear

Collision risk could be further mitigated by reducing motion smear, using high contrast colouring schemes to increase visibility. There is more than enough evidence that high-contrast schemes increase visual acuity for birds (Hodos *et al.* 2001, May *et al.* 2020, Blary *et al.* 2023, Garcia-Rosa *et al.* 2023, Brighton *et al.* 2026), to require that they are mandated, even if there is only the possibility of reducing impact. In being the first of potentially many offshore wind projects in Australia and indeed the Southern Hemisphere, it is appropriate that this assessment includes at least a precautionary motion smear mitigation efficacy evaluation.

Turbine spacing

While there would be cost and environmental disturbance considerations in implementing greater between-turbine spacing, the potential for risk reduction is great. As such, spatial planning iterations that include greater distances between turbines should be considered at least in a collision modelling context. The proposed minimum spacing of 1,062m may be sufficient, but again, there is too much uncertainty to not model other layouts.

In addition to collision risk, increased turbine spacing would also reduce displacement and magnitude and frequency of avoidance responses, and potentially even create noise-free corridors with the farm.

Avoiding creating resting or nesting opportunities

Under section 12.7.2.3 *Physical presence of operational turbines and infrastructure: attraction (OOB-I005)*, it is acknowledged that attraction to infrastructure is unlikely to have a significant impact on seabirds. While this may be the case, it should be an engineering objective to avoid the creation of structural complexity that would allow for resting or nesting. Likewise for all required lighting installations, it should be ensured that no hazardous aspects of associated design such as cables, wires, or any narrow high impact surfaces are in vicinity of all light sources.

Attachment IV – Seabird Monitoring and Management Framework

As detailed in *Chapter 3 – Project Development*, Star of the South has outlined the following mitigation hierarchy:

- 1) Avoid the impact or risk – change a project design parameter or installation method so that the impacts or risks are avoided.
- 2) Minimise the impact or risk – change a project design parameter or installation method so that the impacts or risks are minimised.
- 3) Manage the impact or risk – implement actions, systems or procedures so that the impacts or risks are reduced.
- 4) Offset the impact or risk – conservation actions to counterbalance the significant residual impacts or risks.

We believe, as stated above, there is not a sufficient commitment to the avoidance of impact, especially considering the conservation status of potentially impacted Procellariiformes, and the uncertainty of impacts. We urge a stronger commitment to avoidance.

Taking additional measures for precautionary avoidance is especially important considering the document states that it is “...not feasible to conduct surveys of carcasses of dead birds in the offshore environment, nor capture these rare events using remote sensing.” During the operational phase of the wind farm, monitoring is needed as a “...credible potential for population-level impacts is the trigger for determining if declines are attributable or not.” If the project is found to indeed be having a population-level impact, only then will it be revealed that precautionary mitigation at the earliest stages would have been essential. As it’s been previously stated by the document, avoidance measures are likely unfeasible during the operational phase. As stated, impact remediation or mitigation once the farm is operational is difficult and possibly unfeasible.

This Attachment attempts to cover all eventualities, yet we question the benefit of outcomes resulting from ongoing monitoring considering that, at the operational stage mitigation options are limited. This approach encourages an over-reliance on compensatory offsets. However, this outcome can be avoided with, in addition to the minimum 35m air gap, wider minimum turbine spacing and mandating measures to increase blade visibility such as high-contrast colour schemes.

It is assumed that a reduction in turbine number and therefore increased spacing will reduce barrier effects, collision and displacement risk for modelled species. We appreciate the turbine number reduction accepted by the project, and while it's relatively safe to assume this will reduce risk, there is nevertheless still uncertainty as to whether this is enough to avoid significant impacts. While increasing the air gap from 10m to 35m is again a much-welcomed decision, inferior spacings and alignments could counteract this, and potentially lead to increased barrier effects and displacement. Avoiding and/or minimising the risks of collision and displacement go hand in hand, as opposed to management for one compromising the other.

As stated earlier in this submission, high-contrast colour schemes that improve the visibility of infrastructure must be considered. The only argument against the use of high-contrast colouring schemes is a lack of supporting evidence that such an action would, in this case, reduce collision risk, despite a wealth of evidence supporting effectiveness in other areas with other species. The avoid and minimise steps of the hierarchy must depend on the precautionary principle. The application of colour contrast, to our understanding, would be most efficiently implemented in a pre-installation stage to avoid the risk that should collision frequency become problematic, post-installation implementation may not be feasible.

Accepting a limited precautionary risk reduction strategy is necessary prudence when dealing with threatened species and limited option for retroactive mitigation. Furthermore, the assessment of negligible cumulative impacts is unfounded because this assessment is based upon an entirely unproven and limited suite of impact avoidance measures, and in particular, collision prevention.

Environmental offsets

As a general comment, Humane World for Animals believes that offsets should never be considered best practice. Offsets have been accepted to be inappropriate to alleviate unacceptable impacts, but similarly, offsets should neither allow significant impacts. Offsets should only be used as a final resort, to be used to counterbalance the unavoidable, inherent impacts of any development in the marine space.



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Summary

Humane World for Animals strongly supports a renewable energy transition, and we are motivated to help this transition to mitigate environmental impacts to the greatest extent possible. We are extremely concerned for the impacts on albatross and petrels from offshore wind infrastructure and we recommend a highly precautionary approach to avoidance and mitigation strategies. We will continue to engage on this issue to reduce impact and track the population health of our already imperilled albatross and petrels. Thank you for the opportunity to comment.

Yours sincerely,

References

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