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Star of the South Offshore Wind Project Environmental Effects Statements

I wish to provide the following comments on the Star of the South Offshore Wind project (SOTS) Environmental Effects Statements (EES) currently on exhibition. As my comments overlap and can relate, in whole or in part, to both the Federal and State roles I am preparing a single set of comments for both governments to consider.

As we transition to renewable energy we should adopt as a guiding principle that any transition should not be at any cost to the environment and we need to have a clear understanding of what constitutes acceptable and unacceptable development. Only with this approach can we protect those elements of the environment that we are trying to protect by transitioning to renewables in the first place. The role of an EES is therefore crucial to this process and while the proponent has prepared comprehensive EES's it would have been preferable to have a single assessment of the whole project including the offshore generation infrastructure, the onshore transmission corridor and the construction and operational port arrangements as these are all interrelated and key components that need to be satisfied to ensure the viability of the project.

It is noted that the EES assumes that multiple construction feeder ports will be required and that the Port of Bell Bay and Geelong have been used to estimate vessel round trips for the project and that the Victorian Renewable Energy Terminal at Hastings, which is the subject of a separate EES, may be used *'in their place or in addition'*. Barry Beach Marine Terminal and Port Anthony have been used to estimate vessel round trips for the construction management port. While the EES indicates that *'any port development or upgrade is the responsibility of the port operator and is subject to separate planning and approval processes'*, it is not clear if the port infrastructure is, or will be, suitable in the first place and whether or not the environmental assessment has adequately considered all activities that are a direct consequence of the project. It would help if the roles of the various ports were clarified along with the logistics of how each port will operate in order to justify its suitability and any environmental issues that may need to be addressed. The ports need to be considered as an integral part of the project rather than merely associated infrastructure, particularly as Barry Beach/Port Anthony and Hastings involve development in, or adjacent to, Ramsar areas.

The Gippsland Offshore Wind Zone is intended to provide for multiple offshore wind projects and the Victorian government's scoping document and the Federal government's EPBC Guidelines require the proponent to consider the cumulative impacts associated with this project. The EES's have adequately covered this matter for existing and nearby projects, however because the SOTS is the first off shore wind project in the precinct and the others are at an early, or feasibility stage, there is a lack of knowledge around future wind farms making an assessment of the cumulative impacts very difficult. The technical reports with the EES's acknowledge

this limitation and hence they do not adequately assess cumulative ecosystem change across the offshore wind zone and the Bass Strait ecosystem. Victoria has nine potential offshore licence holders and, if a precautionary approach was followed, any assessment would focus on the likely condition of the Bass Strait ecosystem if all or most of the declared offshore wind projects proceed. The EES does not do this nor does it analyse where ecological thresholds could/should apply. These thresholds could include -

- how much habitat loss is acceptable?
- at what point does cumulative underwater noise become population significant?
- What level of bird collision mortality becomes unsustainable?
- how much displacement of seabirds or marine mammals is tolerable?
- what proportion of Bass Strait habitat can become unavailable before ecosystem function changes?

The EES generally concludes that for the project residual impacts are 'low' or 'acceptable' after mitigation however this is not the same as showing that ecological thresholds will not be exceeded for a development to be acceptable.

The EES indicates that the offshore wind farm will operate for 30 years before it is decommissioned. The EES provides little information on the decommissioning process except that it will involve the removal of all infrastructure above the sea bed and *'be in accordance with the requirements of relevant legislation in place at the time and the approved management plan'*. As the demand for energy is likely to increase from year to year, the government could set new offshore renewable energy targets, particularly if offshore wind energy generation becomes an important source for energy. If this takes place it is very likely that decommissioning will involve not only the replacement of old turbines with new turbines but also increasing the size of the offshore wind zone. In these circumstances the cumulative impact of offshore wind energy generation will continue and it is important therefore that we develop an understanding at the outset of what the environment can sustain and what are the acceptable ecological thresholds.

The cumulative impact assessment is not limited to ecological matters associated with the number of wind turbines but also the movement of vessels to and from ports during the construction and operational phases of this project and any successive project. A report to address shipping and navigation risks associated with the SOTS project (Pivot Maritime International report, August 2022) indicates (p8) that on any given day 5-10 construction management vessels would call at either Hastings or at Barry Beach and Port Anthony during the construction phase of the project and during the operational phase this number would be either 4 for Hastings or 9 for Barry Beach and Port Anthony. If the nine potential offshore licence holders were granted a licence and each generated the same number of ships these numbers would increase to 45-90 vessels per day at both sites during the construction phase and 36 or 81 at Hastings or Barry Beach/Port Anthony respectively during the operational phase. These figures are for construction management vessels only and do not include construction feeder vessels. Clearly the increased vessel movement will not only bring additional risks to shipping and navigation but there will be associated risks to the environment (underwater noise, fauna disturbance, accidental hydrocarbon spill, light emissions, invasive marine species). Consideration therefore

needs to be given to the cumulative effect of increased shipping and what the environment can sustain. Is there a limit to acceptable change and what is it?

The environmental cumulative effects should not be left up to future offshore projects to address and better strategic planning needs to be undertaken using such tools as Marine Spatial Planning to guide future offshore development. It should be noted that many cumulative issues are addressed through commitments such as adaptive management, future monitoring, environmental management plans, offsets and/or additional approvals and while there is a role for these tools they are generally used after acceptable impacts have been demonstrated and should not be a substitute for demonstrating acceptability in the first place.

Recommendation

Given the considerable uncertainties associated with offshore wind development in Victoria, some of which have been identified in these comments and which mainly relate to the cumulative effects of the proposal, it is recommended that should the Star of the South Offshore Wind Project be approved more strategic work be undertaken in future to ensure that any offshore wind development is environmentally sustainable in both the short and long term and is within the threshold limits of acceptable development.

David Grace



29 June 2026