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DOLPHIN RESEARCH INSTITUTE

SUBMISSION ON THE STAR OF SOUTH OFFSHORE WIND FARM

Environmental Impact Statement – Marine Mammal Assessment

Dolphin Research Institute, Hastings, Victoria

28 June 2026

EXECUTIVE STATEMENT

The Dolphin Research Institute (DRI) has reviewed the Star of South Environmental Impact Statement, focusing on whales and dolphins (cetaceans) - the core of our research mission. We support conditional approval with enhanced protections for humpback whale feeding aggregations and mandatory collaborative monitoring during construction.

Key finding: The EIS is rigorous but incomplete for humpback whales. Integration of DRI's decade-long, validated dataset (1,352 sightings with photographic evidence) reveals that critical feeding aggregations and calf presence were not captured and clarified during the EIS baseline.

DRI Position

Conditional approval recommended. Residual risk is manageable through spatial avoidance of feeding zones, if possible, and through temporal mitigation during migration peaks. Enhanced monitoring is essential to evaluate the risk management process. The project should be approved. Design optimisation and pre-construction studies should proceed, and the Dolphin Research Institute would welcome the opportunity to collaborate.

KEY CONSIDERATIONS

1. Humpback Whale Feeding Aggregations – Inadequately Characterised

The EIS reports humpback feeding in 14 of 179 sightings (8%) during East Gippsland surveys. DRI's White Paper documents feeding in 94 of 1,352 validated sightings (7%) across West, Southwest, and Central Bass Strait over a decade, with every data point validated by photographs. Link: [More Than a Migratory Corridor: Humpback Whale Feeding and Calving in Bass Strait](#)

This agreement between datasets strengthens both studies' credibility. However, the close alignment reveals that feeding in Bass Strait now extends far beyond seasonal snacking. Whales may stay for extended feeding periods, suggesting ecological importance that will increase if Antarctic krill productivity declines due to climate change. These feeding

aggregations are not limited to specific high-productivity zones (e.g., the continental shelf break and upwelling areas) but appear to be widespread across the continental shelf, potentially including areas that overlap with the project.

Risk: Feeding disruption during northbound (April–July) or southbound (August–November) migration may prevent energy acquisition, which is critical for breeding success and population recruitment.

Mitigation: Spatial avoidance of feeding zones where feasible, or temporal exclusion during migration peaks.

2. Mother-Calf Pairs During Northerly Migration

DRI's validated dataset documents nine humpback cow-calf pairs on the northerly migration through Bass Strait. Calf size in some observations suggests a newborn status, indicating either calving farther south than previously understood or young calves joining the migration. These vulnerable life stages will remain in the area longer than the EIS assumed, in both the northbound and southbound directions.

Mitigation: Specific protocols for calf protection and mother-calf pair avoidance during construction.

3. Ship Strike Risk Elevated by Feeding Aggregations

Active feeding concentrates whales in specific zones for extended periods, increasing vulnerability to ship strike. The EIS describes massive background commercial vessel traffic. An offshore wind project will add construction vessels, support traffic, and operational vessel movements. The cumulative effect increases strike risk, particularly during migration peaks when both feeding and nursing aggregations. Enhanced vessel speed restrictions and traffic management during construction should be mandatory conditions.

4. Cumulative Commercial Activity and Noise

Bass Strait already carries substantial shipping and oil/gas activity. Construction-phase piling during the winter months (highest noise propagation and worst visibility of whales) coincides with migration periods. Bass Strait is an important migration corridor that the EIS estimates accounts for 10,000 humpback whales during the eastern migration. The combined acoustic burden of baseline and project noise will create a chronically elevated soundscape. DRI recommends a pre-construction cumulative impact assessment and coordination agreements with other marine operators to stagger activities to avoid migration peaks.

5. Impacts to Prey and Predators

The EIS acknowledges potential impacts on prey species being disrupted during construction, causing spatial displacement. And after construction, on the site acting as “artificial habitat”, as do the oil and gas platforms in Bass Strait. Consideration should be given to potential heightened risks to southern right and humpback whales that may be funnelled between the northern extent of the OWPA and the mainland as they move away from construction noise. This could increase predation risk from killer whales and great white sharks frequenting this area.

6. Climate Change and Krill Productivity

The EIS acknowledges that climate change may reduce Antarctic krill availability in high-latitude waters. This elevates the importance of Bass Strait feeding opportunities. If krill suffers at source, feeding in Bass Strait could become more than an optional migration behaviour but essential for breeding success. DRI's research suggests that feeding during migration is energetically critical – project mitigation must reflect this heightened importance.

METHODOLOGICAL ISSUES

Behavioural Assumptions

Noise impact modelling assumes that humpback whales will detect soft start signals and move away from precaution zones. This assumption has not been validated against whale behaviour in Bass Strait. It is thought that feeding whales, particularly in aggregations, may not abandon feeding despite acoustic disturbance – they may exhibit site fidelity to known productive grounds. A pre-construction behavioural baseline survey is essential for validating or refining this assumption.

Observer Detection in Bass Strait Conditions

The framework specifies precaution zone monitoring during daylight and good visibility, but Bass Strait is notorious for poor visibility, high seas, and winter fog. Observer detection of whales in Beaufort 4–5 conditions (typical winter) is substantially lower than in ideal conditions. If precaution zones cannot be effectively monitored, stop-work procedures become ineffective. Pre-construction demonstration of ≥85% detection probability in typical conditions should be mandatory.

ASSESSMENT OF RISKS

DRI agrees with the EIS risk assessment for most species. However, we elevate humpback whale feeding disruption from MODERATE to MODERATE-HIGH risk based on: (1) feeding aggregations now documented in Bass Strait; (2) energy criticality for breeding success; (3) vulnerability of mother-calf pairs; and (4) uncertainty about behavioural response to piling in feeding contexts.

MITIGATION ENHANCEMENTS

Current mitigation is well-designed for most species but requires enhancement for humpback whales:

Spatial understanding: Develop a deeper understanding of the ecology of whale feeding in Bass Strait beyond the shelf break to refine risk management.

Temporal awareness: Maintain vigilant monitoring from multiple sources during April–July (northbound migration) and August–November (southbound migration).

Enhanced acoustic mitigation: If piling is unavoidable in feeding zones during migration, deploy enhanced noise reduction (Hydro Sound Dampener plus Double Big Bubble Curtain).

Real-time adaptive management: Feeding aggregation detection triggers automatic enhanced mitigation or piling suspension. Calf presence triggers stop-work procedures.

NATURE POSITIVE OUTCOMES

If the project proceeds with effective risk management, significant conservation upsides emerge. Construction-phase monitoring will provide important data on marine mammal responses to underwater noise in real-world conditions. A partnership sharing these data with DRI's Two Bays Whale Project would be welcomed and present an opportunity for the community and industry to work together for the benefit of cetaceans. Most significantly, the project's 200+ MW renewable energy capacity avoids ~1 million tonnes CO₂ annually over 25 years, contributing to climate stabilisation that maintains Antarctic krill productivity and ocean stability essential for whale population viability.

CONCLUSIONS AND SUGGESTIONS

The Star of South Environmental Impact Statement is substantially rigorous. However, it does have areas where it could be strengthened. DRI supports the project's approval with the following suggestions:

PRE-CONSTRUCTION	
Behavioural Survey	Conduct May–September baseline survey documenting feeding whale responses, aggregation dynamics, mother-calf behaviour, and calf vulnerability.
Design Optimisation	Overlay DRI's 1,352 validated sightings onto pile positioning. Optimise design to avoid high-density feeding zones.
Feeding Mitigation	Implement wide monitoring through multiple channels to respond to whale feeding in the vicinity of the OWFA.
Detection Validation	Demonstrate ≥85% observer detection probability in typical Bass Strait sea state conditions (Beaufort 4–5).
Cumulative Assessment	Assess total anthropogenic noise burden and establish coordination to reduce the overall risks posed by noise and vessel strike from shipping and oil/gas operators.
CONSTRUCTION	
DRI Monitoring	DRI to coordinate citizen science and community contributions to provide whale sightings.
Adaptive Triggers	Automatic enhanced mitigation or piling suspension if feeding aggregations are detected. Stop-work procedures for calf presence.
POST-CONSTRUCTION	
Research Funding	Minimum \$500,000–1,000,000 for humpback whale research: population structure, feeding ecology, calf survival, long-term viability.
Data Sharing	All construction-phase monitoring data on behavioural responses and mitigation effectiveness are publicly available and independently reviewed.

CONCLUSION

Conditional approval is recommended.

The Star of South Offshore Wind Farm should proceed with enhanced measures to ensure:

- observer detections of whales,
- expansion of the protections for humpback whales,
- publicly accessible and verified reporting during construction and operation,
- significant investment to achieve a greater understanding of the ecology of whales in our region and perhaps other nature-positive and community outcomes.

