



Australian Marine Sciences Association Inc.

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**Re: Star of the South Offshore Wind Farm Project – Draft guidelines for EIS**

26 July 2021

Dear Sir or Madam

The Australian Marine Sciences Association (AMSA) welcomes the opportunity to provide comment on the draft guidelines for the Environmental Impact Statement (EIS) for the Star of the South Wind Farm Project. AMSA is Australia's largest professional association of marine scientists with more than 700 members. For over 50 years, AMSA has promoted all aspects of marine science in Australia, including a long history of providing expert scientific advice to government, industry and other key marine environmental stakeholders on a wide range of marine scientific and environmental issues and activities. All of our Submissions are publicly available here: <https://www.amsa.asn.au/submissions>.

Overall, AMSA supports the proposed action which will provide a source of renewable energy for Australia, as well as contributing to research and development for offshore wind energy. AMSA strongly supports investment in renewable energy because it helps our nation move away from fossil fuels and their unequivocal impact on our marine environment at a global scale (e.g. climate change, ocean acidification).

Nevertheless, our support for renewable energy projects hinges on appropriate monitoring and mitigation of environmental impacts, and the first step for this is an appropriate Environmental Impact Statement. We therefore limit the rest of our Submission to comments and recommendations on the scope and presentation of the Environmental Impact Statement to be prepared:

- The proposed action is the first of its kind in Australia. As such, the EIS will likely draw information about environmental impacts from other offshore wind farms elsewhere in the world (e.g. North Sea). Just because something did or did not have an impact in one location or on a given species does not mean this will apply everywhere.

**Recommendation: Include guidance to consider references from other wind farms in the context of the Bass Strait environment.**

- The guidelines state that “all sources must be appropriately referenced” (Section 2.1.3, also see Section 2.6). Not all references are created equal, and although we acknowledge that environmental impacts are frequently not published in scientific journals, peer-review is still essential to ensure scientific rigour. This is covered somewhat in Section 2.18 but we advocate being more prescriptive.

**Recommendation: Add a clause in Section 2.1.3 and/or Section 2.6 to emphasise that scientific journal articles and externally peer-reviewed reports are preferred wherever possible.**

- An Executive Summary is often the only part of the EIS that a stakeholder will read. As such, it should include information relevant to all stakeholders, including how they will be engaged throughout the proposed action. This is currently described in Section 2.12 but should be referred to in Executive Summary too.

**Recommendation: Add a point to the Executive Summary inclusions to describe how and when stakeholders will be notified of key phases of the development and findings from any environmental monitoring studies.**

- We do not understand what the reference is to defining ‘the onshore’ in 2.2 (d). Surely this is covered in the

other points related to onshore infrastructure.

**Recommendation: Delete 'the onshore' in 2.2 (d).**

- Aerial photographs are mentioned in the Description of the Action, but satellite images are arguably more accessible and useful (from a monitoring perspective).

**Recommendation: Add 'satellite imagery' to the list of potential descriptive sources in 2.3**

- The fisheries industry represents one of the key stakeholders for the proposed actions, and environmental impact to commercially important species will need to be assessed. This sector should be explicitly mentioned at several points in the guidelines.

**Recommendation: Add fisheries to the last bullet point in Section 2.5 (i.e. "existing anthropogenic uses of the Gippsland Basin and Bass Strait, including those related to commercial and recreational fisheries"). Also add 'commercially important species' with listed species already mentioned in 2.7.2.**

- There is no scope related to the outcomes of field studies or surveys for habitat assessments. This point as currently worded is impossible to apply.
- **Recommendation: In Section 2.6, change the sentence to: "The habitat assessment must be informed by, at a minimum, a desktop assessment of relevant Commonwealth and State Government databases and the outcomes of relevant field surveys or studies that are applicable to the habitat, communities, or species in the project area."**

- It is our experience that Commonwealth and state government reports and resources can often be challenging to find, particularly with administrative restructures and digital infrastructure changes over the years.

**Recommendation: Embed links or list URLs to the reports and resources listed in Section 2.7.**

- "Baseline monitoring" is unhelpful and vague, unless specifying what is to be monitored.

**Recommendation: In Section 2.7.2, change the second bullet point to "baseline monitoring of listed and commercially important species during pre-construction, construction and operation, to gather sufficient data to provide a baseline for later studies or monitoring as required (including in relevant plans) to verify that environment outcomes have been met. In addition environmental baselines related to substrate and bathymetry are required to ensure appropriate noise propagation modelling"**

- The current guidelines show limited consideration of how the proposed development may affect vessel routes in the area and the associated impacts on fishing and tourism.

**Recommendation: In Section 2.7 include a separate section on impacts on local offshore industries (e.g. fisheries, tourism) due to exclusion zones around turbines and other infrastructure.**

Please feel free to contact me at the details below for further information.

Kind Regards



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