

New South Wales Game Fishing Association Inc. Submission on the Offshore wind industry consultation process to the Senate Standing Committees on Environment and Communications August 2024.

The New South Wales Game Fishing Association (NSWGFA) was formed in 1952 making it 71 years old and then on the 26th June 1989 it became an Incorporated Association under the NSW Associations Incorporation Act, 1984. NSWGFA Inc. is the controlling body for game fishing in the Coastal Waters of NSW and out to the AFZ. Membership is made up of 24 affiliated clubs with a current membership of 2747 male & female adult, 294 male & female junior (under 16 years) and 147 male & female small fry (under 11 years) members giving a total of 3188. NSWGFA is also affiliated with the Game Fishing Association of Australia Inc. (GFAA) which is the first national association in the world.

NSWGFA is self-funding and has allocated a large amount of funds towards research and the management of game fish species in NSW Coastal Waters out to approximately 110km offshore. This research includes the NSW Game Fish Tournament Monitoring Program which has now been running for 30 years with the co-operation of the association and all its affiliated clubs and anglers. This research provides statistics of all pelagic species that are Tagged & Released and or captured plus it provides CPUE of the fleet during all tournaments run by the association and all its clubs. The data from this program has and continues to be used for stock assessments of pelagic species by NSW DPI Fisheries, AFMA and other bodies. It is fully recognized by government agencies and is run and managed by Marine Scientist Danielle Ghosn of Ghosn Consulting. This program was previously funded by NSW Fisheries and now with seed funding provided by NSWGFA, GFAA and the Fishing Museum Ltd, the NSW Recreational Fishing Licence Trust funds the program. Annual Reports are available for this program which clearly indicate effort as well as catch rates in the proposed Offshore Wind Farm areas off NSW.

Our affiliated clubs run point scores for both tag & release and capture 365 days of the year plus there are 32 invitational tournaments run over approximately 95 days each year in all NSW coastal waters from the coast line out to and over the continental shelf were the proposed offshore wind farms are to be situated.

NSWGFA is also a major partner with NSW DPI Fisheries in distributing scientific tags for pelagic species in NSW Offshore Coastal Waters. This Tag program which commenced in 1973 as an understanding between the NSWGFA and NSW Fisheries, is recognised as one of the largest and most successful tagging programs in the World. Since commencement date till end of 2022 the grand total of fish tagged is over 510,000 with over 9,500 fish re-captured.

NSWGFA affiliated members provide the means for these valuable scientific programs to operate, as it is our members who tag and release and capture the fish at their own cost and provide all the information back to both State and Federal governments and other interested scientific institutions.

Our sport is predominantly Tag and Release. Approximately 98% billfish, 87% sharks, 78% tuna and 71% other pelagic species catches are tagged and released and returned back into the water alive. This data is sent to NSW DPI Fisheries for them to input into the NSW Fisheries Tag Program Database. Fish captured and brought to clubs weigh stations are used for food plus samples are taken by marine scientists to study for aging, sexing, DNA samples and other specific science projects.

Game fishers are avid travellers and many of our affiliated member's fish across all coastal waters up and down NSW contributing to tourism income and to regional economies in a substantial manner.

NSWGFA encourages children and youth participation through our small fry and junior programs and has a Code of Practice outlining the expectations for its members and setting the standards for all game fishing exponents.

The NSWGFA is clearly an advocate for responsible recreational game fishing and the use of citizen science to gain a better understanding of the marine environment. The loss of access to the proposed areas of the offshore wind farms in NSW will possibly destroy and will certainly hinder the sport of game fishing and recreational fishing for pelagic species in general.

The consultation process of engagement for not only the community but our members and general recreational fishers has been lacking and inadequate. The community information sessions for both the Hunter and the Illawarra Offshore wind zones were only held during week days and at times when nearly all interested people were at work and could not attend.

For those that did attend sessions the personnel from DCCEEW could not answer simple and specific questions. They could not provide clarity on how the offshore wind energy industry would impact the environment or fish stocks. They generalized their comments and mainly stated that information was to be provided by the proponents for Feasibility Licences, however NOPSEMA who are responsible for overseeing the implementation of the OEI Act recommended the proponents for Feasibility Licences do not consult with the community until they receive a Feasibility Licence which in our opinion is unacceptable and too late. DCCEEW did not provide any evidence that any impact analysis was undertaken when selecting the proposed areas, surely this should have been provided by the government as part of the consultation process.

No one from government would or could provide answers regarding how many wind towers were to be placed in each declared zone nor what the exclusion zones around the towers and sub-stations would be. One report suggested that the turbines were to be situated beyond the areas fished recreationally yet we provided evidence that from 2004 to 2023 there were 17,916 game fish tagged & released plus 1,434 fish captured and weighed in the area declared for the Hunter Offshore Wind Farm. We also have heat maps for fish numbers caught, tagged & released and captured in the Illawarra Offshore Wind Farm area which are also in the thousands.

A major concern regarding the Offshore wind farms off the coast of NSW is that due to the depth of water in the declared zones the wind towers and their connecting sub-stations have to be a floating design, which is still in the design stage, is Australia to be the first country with hundreds of these experimental towers and sub-stations deployed in our waters? We have grave concerns regarding the effect the structures and components may have on sea life and nobody can or will answer those concerns.

There were over 14,200 submissions for the Illawarra wind zone with **65% against** yet this was ignored. The summary consultation report stated that the submissions against the zone being declared were not a representative sample of the population therefore the zone was declared. For DCCEEW to suggest public submissions did not represent public opinion made a mockery of the consultation process. It was also certainly not adhering to the principle of community engagement it was ignoring the community.

Both these wind farm zones are very much hotspots for game/sport/recreational fishers as well as charter and commercial fishers. These waters produce very high numbers of catches and tag & releases of Marlin, Tuna, Mahi Mahi, sharks and many other pelagic species as well as many demersal species plus lobsters and crabs. They also cover areas where the NSW DPI Fisheries FAD's are placed each year to promote recreational fishing. The FADs in these areas will not be able to be deployed so the promotion of recreational fishing in these areas will be greatly affected as well as destroying the sport of game fishing and many of our affiliated clubs which in turn will be devastating to regional communities, their economies and tourism.

Offshore wind turbines generate anthropogenic noise that can affect marine life, it can disrupt communication, navigation, feeding, and other critical behaviours of marine animals. This is particularly true for species that rely on sound for communication, such as whales and dolphins. Anthropogenic sound can also cause physical harm to marine life, such as hearing loss, tissue damage, and behavioural changes. The proposed Illawarra and Hunter wind farm areas are directly in the migration area of whales and dolphins so extreme caution must be considered and taken into account. Any damage to these species which are protected under the EPBC Act cannot be tolerated and would also greatly affect the Whale watching and tourism industries in these areas.

The construction and installation of offshore wind turbines will cause significant underwater disturbances, affecting marine species' behaviour and migration patterns. During operation, the wind turbines emit an electromagnetic field that interferes with the ocean's natural electromagnetic fields. Fish and mammals use these electromagnetic fields as their natural magnetic compass to navigate the underwater environment to search for food, communicate, stay orientated and migrate, locate resources and predators, etc.

Offshore wind farms will also cause damage to spawning and nursery areas, increased turbidity resulting in smothering of reefs, movement of sediment and reduced light penetration, changes to hydrodynamics of the area, barriers to migration routes and possibly affect and move the Australian east coast current which would be a massive disaster to nature.

Impacts on fishing whether it is the commercial, charter or recreational/game fishing sector, will be significantly impacted by the introduction of offshore wind farms. The sheer scale and resultant exclusion zones of wind farms across key fishing areas will severely impact the viability of these sectors. With the exclusion of fishing activity, both recreational/game, charter and commercial in the affected areas by the offshore wind farms will have a triple-bottom-line effect. The economic, social, and environmental consequences for the recreational fishermen, the commercial fishing industry, the coastal communities that depend on these sectors, and society in general, will be negatively impacted.

There is no doubt that the wind turbines will injure and kill many endangered and protected sea birds such as Petrels, Wedge-tailed/Short tailed and Sooty Shearwaters, Wandering and other type Albatrosses. All these sea birds are protected under the EPCB Act. A study by the Conservation Action Lab, UC Santa Cruz, identified that seabirds are the most highly threatened group of birds. The potential impacts of offshore wind farms include the displacement of birds from areas where they forage for food and direct mortality from collisions with wind turbines. Both displacement and mortality can have detrimental effects on the overall population of an affected species.

Of importance, these birds return to their breeding islands under the cover of darkness as a predator-avoidance strategy and they will be even more susceptible to strike with the turbines during darkness. In moderate to high winds, these seabirds fly high over the water, to minimise energy-use by using the power of the wind to move them. This will likely put them into the strike-zone for the turbine blades as the blade tip height is to be 268metres which is twice the height of the Sydney Harbour Bridge. There are too many unknowns in relation to the nocturnal movements of seabirds and migratory shorebirds coupled with the possible interference/disruption with passage and activities of the marine organisms on which these birds feed, to press ahead with construction of these enormous structures which are potentially dangerous to the rich biodiversity of the wind farm regions.

Exclusions zones around the wind towers and sub-stations will jeopardise recreational/game fishing participation rates, as a result this will directly impact the viability of the NSW Interclub State Championships which have been held in the Hunter offshore wind farm area for the past 61 years, the Port Stephens Billfish Shoot-Out, the Newcastle East Coast Classic and other smaller tournaments, all contributing heavily to the local tourism-based economy of Port Stephens and the surrounding areas.

This impact will also be replicated in the Illawarra area as this area is also heavily fished by all sectors of the fishing industry. The game fishing clubs from Broken Bay, Sydney, Botany Bay, Port Hacking, Wollongong, Shellharbour, Kiama, Shoalhaven and Jervis Bay all hold fishing tournaments in the proposed area. It is also a heavily fished area for the commercial sector which provides fresh seafood to the Australian people.

Currently there are only 4 Floating Offshore wind farms with 22 Turbines operating in the world and all these are nowhere near the size or scope of the proposed Illawarra and Hunter proposed wind farms. In fact all 5 turbines of the Hywind Scotland floating wind farm are to be towed back to a Norwegian port for major repair after 7 years operation and it has been reported the cost of this operation may result in the closure of that wind farm leaving only 17 floating turbines operating currently.

Due to the depth of the ocean where these proposed wind farms are to be placed, it would appear that the floating offshore wind farm proponents are using the coastal waters of NSW similar to being guinea pigs in a science laboratory. The Australian Government should not be allowing a risky experiment of floating offshore wind farms in our waters.

The NSWGFA is very concerned and critical of the consultation and community engagement process which we believe was virtually non-existent and certainly did not meet the expectations of our members, other recreational fishers and many other concerned citizens.

NSWGFA does not support, in fact we strongly oppose the Floating Offshore Wind Farms in the proposed Illawarra and Hunter areas.