

No Offshore Turbines Port Stephens

Monday, 26<sup>th</sup> August, 2024

Committee Secretary

Senate Standing Committees on Environment and Communications

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Dear Recipient,

Please find attached our submission in response to the Senate Inquiry into the Offshore wind industry consultation 3 July 2024.

The consultation process undertaken on behalf of the Australian Government into the offshore wind industry, with particular reference to:

- (a) the efficacy of community engagement and benefit in planning, developing and operating the offshore wind industry;
- (b) community engagement within the existing Australian Government offshore wind industry regulatory and legislative frameworks;
- (c) the adherence to the principles of Free, Prior and Informed Consent from Traditional Owners of the affected Sea Country by the Australian Government and offshore wind industry;
- (d) the impact of the offshore wind industry on marine life and marine environments in Australian waters, including strategies for impact minimisation and management; and
- (e) any other related matters.

Benjamin Abbott

President

No Offshore Turbines Port Stephens INC2400484

## SUMMARY

- No Offshore Turbines Port Stephens (notPS) recognises the role of renewable energy developments in decarbonising our energy system and meeting climate targets, but we do not support the development of an offshore wind zone off the Port Stephens coast as an appropriate site for such a development nor do we accept the development of an offshore wind industry in this country as an efficacious and feasible approach for Australian conditions.
- Due to the failure of the government to raise appropriate issue awareness of the proposed offshore wind zone off the Hunter coast the majority of Port Stephens residents only became aware of the proposal when the zone was declared in July, 2023 well after the initial consultation period had closed.
- Accordingly, the majority of Port Stephens residents were denied the right to participate in the consultation process and have a say in the future of their home and community. Only 7.97% of submissions received came from Port Stephens.
- The initial consultation process was inadequate consisting of a singular information session in the Port Stephens LGA for a population of 76,000 and providing very limited information.
- The initial consultation process was flawed due to vested interest groups being allowed to make submissions.
- The Hunter offshore wind zone was declared despite the majority of submissions being opposed to the proposal, making a sham of the consultation process.
- Despite repeated requests from residents the government has refused to re-open the consultation process in a fair and transparent manner.
- The Energy Infrastructure Commissioner's Community Engagement Review revealed that 9 out of 10 respondents reported inadequate and unsatisfactory engagement yet the same engagement practices are still being rolled out in each new offshore wind zone across the country with the same complaints being made by affected communities.
- There appears to be no net benefit to host communities in the planning, developing and operating of the offshore wind industry when the majority of any energy produced is earmarked for heavy industry and the detrimental impacts such as loss of social identity, cultural heritage and natural and scenic environments is taken into account. The government has failed to take these factors into account in their site selection process.
- A thorough examination of the potential impacts of an offshore wind industry on marine environments in Australian waters has not been undertaken. As a development of the scale and size of floating wind turbines proposed is completely unprecedented, the environmental impacts are as yet unknown, but research on overseas wind farms, which are predominantly of a different type and

scale and are not in major marine animal migration routes, have shown that marine life can become displaced from their traditional breeding and feeding grounds.

- Wind energy developers and researchers have identified that potential significant impacts may exist for many threatened and non-threatened species including whales, dolphins, seals, sharks, rays, turtles, crustaceans, fish, birds and plants.
- Of particular concern is the lack of information on the cumulative effects of the numerous proposed developments, each containing hundreds of turbines, along the Australian coastline as this is unprecedented anywhere in the world.
- Impact minimisation and mitigation strategies permit harm to be caused to our natural environment. It is our position that the optimal mitigation strategy is to permit no harm by conserving our pristine ocean environments in their natural and unaltered state.
- Port Stephens' two main industries of tourism and fishing could potentially be detrimentally impacted by the development of the Hunter offshore wind zone leading to socio-economic decline of the area.
- Port Stephens is not a highly urbanised or industrialised area with the coast of Port Stephens appearing largely the same as it did hundreds of years ago. This is due to the recognition and protection of these areas of outstanding beauty and ecological and cultural significance in the form of National Parks, RAMSAR wetlands, state and commonwealth marine parks and cultural conservation lands. It is the most protected part of the NSW coastline and thus to propose to develop it with large areas of industrialisation is entirely out of character and completely inappropriate.
- Finally, notPS will not support a policy which proposes to place expensive and intermittent power sources into our pristine oceans when there are other options available which are not being considered. In Australia, a country which has a large land mass, low population density, abundant natural resources and favourable weather patterns the intervention of offshore wind farms in our oceans is unwarranted, inefficient and inappropriate.

## INTRODUCTION

My name is Ben Abbott and I am making this submission on the behalf of No Offshore Turbines Port Stephens (notPS). notPS is a grassroots community group founded by a local Port Stephens resident to represent community concerns after the declaration of the Hunter offshore wind zone in July, 2023.

Our vision is: -

“To protect and conserve the natural environment, cultural heritage and social identity of Port Stephens by preventing the industrialisation of the Hunter Coast with the development of floating offshore wind farms.”

Whilst notPS recognises the role of renewable energy developments in decarbonising our energy system and meeting climate targets we do not support the development of an offshore wind zone off the Port Stephens

coast as an appropriate site for such a development nor do we accept the development of an offshore wind industry in this country as an efficacious and feasible approach for Australian conditions.

We welcome this opportunity to submit to this senate inquiry on the consultation process undertaken on behalf of the Australian Government into the offshore wind industry. Our submission will be based on the terms of reference (a), (d) and (e).

**(a) The efficacy of community engagement and benefit in planning, developing and operating the offshore wind industry.**

The Port Stephens community, with particular reference to the Tomaree Peninsula and surrounding area, is a small, tight-knit community where information is quickly shared and soon becomes local knowledge. However, when the Hunter offshore wind zone was declared in July, 2023 this community was left reeling in a state of shock and confusion due to a lack of awareness that the proposal for an offshore wind zone off our coast was even under consideration.

What ensued was a frenetic and desperate scramble for elusive information on this development proposal, in an effort to try and comprehend what this meant for our community, how it had progressed without our knowledge or input and what steps could be taken to repeal this decision or at the very least have the community consultation process re-opened due to its complete inadequacy. Out of this process our community opposition group, notPS, was established.

The community engagement and consultation process in the Port Stephens region was severely lacking and completely inadequate. As outlined above, awareness of this proposal and the related consultation process was extremely limited with only very few residents receiving an information mail out. There are reports that mail outs were found dumped in bins around the area and I am yet to this day to lay my eyes on this mail out. The majority of residents would still be unable to tell you what this mail out looked like or what information it contained.

The Department of Climate Change, Energy, the Environment and Water (DCCEEW) states it also placed notices in print media, radio, social media and on their website and social media channels. In these current times where many people access their information from digital streaming services these notices did not have the required impact of raising awareness in this community and proved to be completely inadequate. Unless someone works in this field why would the average community member be monitoring DCCEEW'S website and social channels? Where were the TV commercials that are used in other government campaigns and that have now been recommended in the Energy Infrastructure Commissioner's Community Engagement Review?

Even our Labor Federal Member of Parliament Meryl Swanson agrees that DCCEEW's awareness raising attempts were completely inadequate stating in a 20th January, 2024 ABC online news article titled "In the Hunter, all eyes are on the horizon":-

"I think that also during the consultation period, we were let down by our own department in some ways, and I feel that quite strongly. The days of being able to say 'well, we ran an ad and we dropped some flyers, they're gone."

The ABC article also "states she (Meryl Swanson MP) was critical of the way her own government's department managed the initial consultation process, saying too many people felt taken by surprise."

Not surprisingly, this lack of community awareness led to poor community participation in the initial consultation process. On NBN news on Tuesday 19<sup>th</sup> September, 2023 the Energy Minister Chris Bowen stated that one information session was held in Port Stephens LGA at Nelson Bay which 80 people attended. It is questionable whether those people were all local residents or representatives of other vested groups such as green energy bodies, union and political party members and employees? In any case, 80 people out of a total Port Stephens LGA population of 76,000 represents 0.1% of the population and does not constitute adequate consultation. One single consultation session in one location for a LGA population of 76,000 covering a land area of 858.5 square km, on such an impactful issue, also does not constitute adequate consultation.

For further evidence please consider the following pie chart sourced from DCCEEWS Hunter Submissions Summary Report showing localities where submissions for the proposed zone were received from.

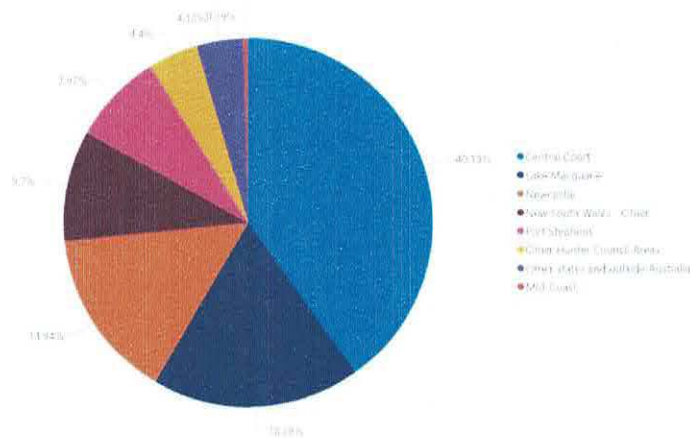


Figure 2 – Locations of individuals submissions

Only 7.97% of submissions came from Port Stephens despite this being the major host community of the proposed development – does this seem right to you, if appropriate awareness was raised and adequate consultation was enacted?

Compounding the poor participation rate of Port Stephens residents in this process, an inherent flaw in the consultation process was that submissions were accepted from groups including vested interest groups such as wind energy companies which would have been very aware of the proposal and the consultation process, unlike the residents of Port Stephens. This was not a level playing field, resulting in a sham consultation process.

The next pie chart below, sourced from the same DCCEEWS report, shows 66% of submissions were opposed to the zone.

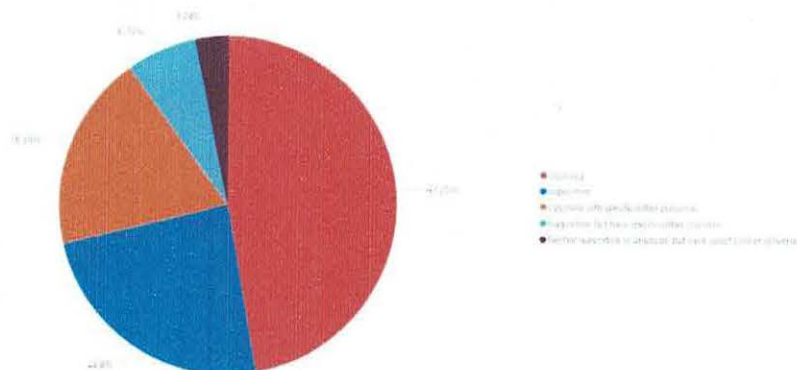


Figure 4 – Sentiment towards the proposal

Despite the majority of the submissions being opposed to the zone and only 24% of respondents being supportive without any concerns, the zone was still declared, making a farce of the whole consultation process.

Additionally, the few residents who did attend the singular consultation session reported the small amount of information provided was vague and of poor quality and many questions went unanswered with the common response being “you’ll have to ask the developers about that” with no contact information given for said “developers.”

After the government denied many Port Stephens residents the opportunity to have a say on the future of their home and community by refusing repeated requests from residents to re-open the consultation process in a fair and transparent manner, residents made submissions to the Energy Infrastructure Commissioner’s Community Engagement Review. This report found that there are chronic problems, with a survey showing a staggering 92% of respondents were dissatisfied with the level of engagement and more than 90% of people were dissatisfied with the information being provided or with their concerns being resolved. That’s 9 out of 10 people reporting inadequate and unsatisfactory engagement practices yet the same engagement practices are continuing in each new offshore wind zone with the same complaints being made by affected communities.

In terms of community benefit in the planning, development and operation of offshore wind zones the Community Engagement Review recommends: -

“The integration and use of strategic mapping in the site selection process will provide jurisdictions with the opportunity to clearly identify no-go zones, along with ‘go’ or ‘more information required zones. This should help jurisdictions considerably when justifying the most appropriate areas for development of large-scale renewable energy assets and new transmission infrastructure. Equally, it should clearly identify areas to avoid, such as areas of high agricultural, environmental and cultural values.”

The government has failed to take these factors into account, basing their selection process on strong consistent winds and proximity to infrastructure. A quick look at a wind map reveals that wind speeds are pretty consistent along the East Coast with better speeds found to the south of the continent leading to the conclusion that the main determination used has been the position of infrastructure and industry. Alison Byrnes MP for The Illawarra clearly states in her submission:-

“The offshore wind proposal for the Illawarra – if implemented at the current proposed size – would generate enough electricity to power 3.4 million houses. BlueScope will need about two thirds of that amount of energy to keep our local steel works open and producing green steel in the future.”

The Hunter region houses Tomago Aluminium, which is the biggest user of electricity in NSW, so it is also likely that the majority of any energy produced at the Hunter zone will be earmarked for industry i.e. the real benefactors of these proposals will be industry not community. Furthermore, the small amount of energy communities may receive will not likely be of net benefit to the community when the potential detrimental effects of these zones such as, but not limited to, loss of social identity, cultural heritage, natural and scenic environments are taken into consideration.

**(d) the impact of the offshore wind industry on marine life and marine environments in Australian waters, including strategies for impact minimisation and management**

A thorough examination of the potential impacts of an offshore wind industry on marine environments in Australian waters has not been undertaken. As the global floating offshore wind industry is still in its infancy, the limited information currently available is generally based on fixed bottom turbines in overseas countries that do not inhabit the same hemisphere as Australia never mind share our unique geographical features and wildlife. Our country has the worst extinction record for mammals in the world and NSW biodiversity has hit a record low with recent government data showing that our habitat is so degraded it can only support 29% of the animals and plants that it once could.

As the development of the scale and size of floating wind turbines proposed is completely unprecedented, the environmental impacts are as yet unknown but research on overseas wind farms, which are predominantly of a different type and scale and are not in major marine animal migration routes, have shown that marine organisms can become displaced from their traditional breeding and feeding grounds leading to declines in reproduction and survival rates and other studies have shown deformities in crustaceans.

Every year approximately 40,000 whales migrate past Port Stephens. The East Coast of Australia is a major whale migration route within a whale sanctuary where it is offence to harass or herd whales. Placing multiple, large areas of industrialisation into this route will force whales to alter their natural behaviour. These changed behaviours could have devastating impacts on whale numbers which are still recovering after they were almost hunted to extinction by humans.

Port Stephens is renowned for offering whale and dolphin watch cruises and is regarded as the dolphin capital of Australia. Its resident dolphin population is an integral part of its social identity. Wind turbines are known to affect dolphins through emitting electromagnetic fields (EMF) and also via underwater noise. Greenpeace states “There’s lots of evidence that when you’re putting the wind farms in place, it does generate a lot of percussive noise, and that can have an impact. Particularly things like porpoises or dolphins, they may move out of that area while you’re installing the wind farms, but then the longer-term picture: in some areas they never come back, in some they come back in larger numbers than before.” Port Stephens without its resident dolphins is unimaginable and would have devastating effect on the local area’s residents and businesses. Whether the dolphins completely disappear or return in larger numbers, this change would unbalance the delicate marine ecosystem and food chain with flow on effects to all other species. These noise effects also apply to other marine mammals such as whales and seals.

EMF emitted from the turbines impact other species such as sharks and rays. Port Stephens is home to one of the two known Great White Shark nurseries on the East Coast of Australia. It is unknown what effect placing hundreds of wind turbines bordering this nursery will have. Port Stephens and The Myall Coast also contains critical habitat for the critically endangered East Coast population of Grey Nurse Sharks and once again it is unknown what effects hundreds of wind turbines will have on these shy and elusive creatures. Bluefloat (offshore wind developer) have stated in their EPBC report, "Based on preliminary assessment, the Project may result in potentially significant impacts on the following species: Humpback Whales, Southern Right Whales, Fin Whales, Sei Whales- potential impact associated with underwater noise, electromagnetic fields (EMF) and entanglement. Grey Nurse Shark – potential impact associated with underwater noise and EMF. Marine turtles, Loggerhead turtles, Flatback Sea turtle, Hawksbill Sea turtle, Green Sea turtle – potential impact associated with interruption to foraging by underwater noise and entanglement." The bottom line is whether species are protected or not we should not be placing them at unnecessary risk by placing unwarranted human interventions into their environment.

Also of concern is the possible effects on our seabirds, many which migrate thousands of kilometres to reach our shore each year. It is well documented that wind turbines maim and fatally injure birds. Of particular concern to Port Stephens is the Gould's Petrel which is endemic to our area, only breeding on two of our offshore islands. Over the last three decades, persistent, dedicated efforts have been put into a breeding programme to raise their numbers to remove this species off the endangered list and onto the threatened list. We can't afford to put all of this hard work and this bird's low population at risk due to the possible detrimental impacts of industrialising their habitat with wind turbines. Bluefloat (offshore wind developer) have stated in their EPBC report, "Based on preliminary assessment, the Project may result in potentially significant impacts on the following species: Albatross and Petrel species, Curlews, Sandpipers, Plovers, Bitterns, Terns, Knots, Parrots etc – potential impact associated with turbine strikes"

Additionally, light pollution at night from wind turbines places birds and other species such as turtles at risk due to confusion. Studies show that light pollution is also impacting animal behaviours, such as migration patterns, wake-sleep habits, and habitat formation. Because of light pollution, sea turtles and birds guided by moonlight during migration get confused, lose their way, and often die.

The proposed zone would be located adjacent to the edge of the continental shelf. In this area an upwelling occurs which combined with the East Australian Current brings nutrient rich water to the surface providing rich feeding grounds for unprecedented numbers of birds, fish and other marine mammals. What effects the proposed development would have on this natural system is unknown, but studies have shown that turbines do alter local ocean currents and atmospheric conditions.

It is suggested that the turbines will act as artificial reefs attracting fish and marine creatures to the area. This process may introduce invasive species to the area and upset the natural balance of the food chain. Professor Ivan Nagelkerken, a marine ecologist at the University of Adelaide says "Large human-built infrastructure can attract species over time, acting like artificial reefs for some marine life. But Nagelkerken warns that the ultimate risk for both animal species and humans is the disruption to local processes that diminishes fishery productivity. Artificial habitats wouldn't necessarily have the same productivity as a natural habitat. The risk, he says, is that attracting fish and producing fish are very different phenomena. He points to the risk of large supportive platforms being built for wind turbines upending marine ecosystems and the potential disruption caused by noise pollution, sedimentation or toxin release from the infrastructure."

When we look at the hundreds of floating offshore turbines that are proposed for The Hunter and Illawarra zones the lack of information on the cumulative effects of these proposed developments is significant. There



are only a small number of floating offshore turbines developments in operation in the whole world. None of these contain hundreds of turbines or are in close proximity to each other. Compounding this is the fact that we have so little baseline data on the Australian marine environment. When we don't have a full understanding of the environment we propose to alter how can we possibly understand what the potential impacts may be?

Impact minimisation and mitigation strategies permit harm to be caused to our natural environment. It is our position that the optimal mitigation strategy is to permit no harm by conserving our pristine ocean environments in their natural and unaltered state i.e. it is in our nation's and planet's best interest to protect biodiversity by not allowing the industrialisation of our oceans with offshore wind turbine developments.

**(e) any other related matters**

Port Stephens' two main industries of tourism and recreation, and fishing stand to be detrimentally impacted by the proposed development of offshore wind, if it proceeds.

Port Stephens is a major tourist destination for both international and domestic tourists. Tourism injects over \$800M into the local economy annually. Both Minister Bowen and Bluefloat wind energy company have stated that the turbines will be visible from shore. This proposed area of large industrialisation will ruin the natural vistas that Port Stephens is famous for including the famous views from Tomaree Headland and the recently installed \$6M coastal walkway through the national park. If the beautiful and pristine Port Stephens natural environment is allowed to be desecrated by this proposed development this could potentially destroy its major industry of tourism with consequent flow on effects of severe economic downturn and social decline.

The proposed development could potentially have major detrimental impacts on Port Stephens' other major industry of fishing, both commercial and recreational. These fishing areas feed into the Newcastle Commercial Fisherman's Co-op (largest seafood co-operative in NSW) and removal of these grounds could lead to their potential shutdown which will significantly impact the Sydney Fish Market and seafood supplied to our nation.

Fishing is built into the very fabric of Port Stephens and is strongly rooted in its history and culture. There are an estimated 1 million plus recreational fishers in NSW and a good percentage travel to Port Stephens every year to wet a line. Port Stephens hosts the largest fishing tournament in the Southern Hemisphere which injects millions of dollars into the local economy. The declared wind farm area lays right over the world-famous fishing location called 'The Car Park' which is one of the most unique natural wonders in Australian waters. If the proposed offshore wind zone proceeds fishing in this area will be extremely restricted and perhaps prohibited. The flow on effects of this will compound consequent socio-economic decline in the area. Many more industries such as hospitality and small businesses will be negatively impacted by these flow on effects. More jobs are at threat of being displaced than any created by the proposed development.

Port Stephens is also not a highly urbanised or industrialised area. The coast of Port Stephens and The Myall Coast today remains relatively untouched and looks largely the same as it did hundreds of years ago. This is due to the recognition and protection of these areas of outstanding beauty in the form of National Parks, RAMSAR wetlands, state and commonwealth marine parks and cultural conservation lands. It is the most protected part of the NSW coastline and thus to propose to develop it with large areas of industrialisation is entirely out of character and completely inappropriate.

Finally, notPS will not support a policy which proposes to place expensive and intermittent power sources into our pristine oceans when there are other options available which are not being considered. Floating offshore wind is estimated to cost twice to thrice as much as onshore wind and has low capacity factors in the range of 30-50%. In a country like Australia which has a large land mass, low population density, abundant natural resources and favourable weather patterns the intervention of offshore wind farms in our oceans is unwarranted, inefficient and inappropriate.