



THE GAME FISHING ASSOCIATION OF AUSTRALIA INC.

29th August 2024

Ian Bladin
President

To: ec.sen@aph.gov.au

Glen Sparks
Vice President

**Re: Submission to The Senate Environment and
Communications Reference Committee**

Firstly, thank you for the invitation to make a submission on this very important issue.

Peter Coote
Secretary

Summary

The Game Fishing Association of Australia (GFAA) is an apolitical organisation representing, as a peak body, game fishers' interests throughout Australia. The organisation and its members have been very disappointed in the level and quality of communications throughout the development of the plans for offshore wind energy. Further, the processes that have been adopted appear to have created mistrust in the government and its agencies.

All Correspondence to
The Secretary.
PO Box 57
North Beach 6920
Western Australia

John Marsh
Treasurer

This submission approaches all the issues that we feel are relevant to our membership and that link to the community as a whole including economic impact.

Peter Babarskas
Records Officer

There is a lack of trust in the future of wind energy and its government and commercial partners.

Leyland Campbell
Conservation Officer

Introduction

GFAA is the longest established national fishing organisation anywhere in the world. It has an ongoing commitment to conservation that is reflected in each of our state associations and the more than 80 fishing clubs they represent. With nearly 9,000 active members GFAA is the voice of game fishing in Australia. It is a not-for-profit volunteer-run organisation.

Website: www.gfaa.asn.au

ABN 24 498 365 663

GFAA acknowledges the Australian Government's carbon reduction targets and supports the development of technology that offers a more environmentally friendly source of energy generation. Despite confused signals from the Minister, it would appear logistically impossible that game fishing and an offshore

wind energy industry can coexist. Loss of access during extended construction and operation phases would require exceptional effort on the part of proponents particularly if floating turbines are utilised.

Commonwealth Jurisdiction

Game fishing by definition is the pursuit of pelagic species in open waters. Almost all of this occurs in commonwealth waters hence the relevance of offshore wind energy to GFAA's members.

Specific communications concerns

Trust is the beginning and end of GFAA members' concerns. Affiliated members of our association have attended most of the public events that have been conducted in all impacted states. A uniform concern that has been expressed is the manner in which these have been organised and conducted with selective access and generally presenters who had no answers for the many concerns expressed. The depth of information volunteered is almost mischievous in its omissions. And written communications with the Minister's office have been disappointingly slow in response and worse in quality.

For example, the Minister's 20 February announcement about the proposed WA Offshore wind zone states: "*Fishing and offshore wind can co-exist, but it's not automatic that it can*". It is unclear if those comments were in reference to all fishing or only certain types of commercial fishing such as trawling. This statement has created an urgent need for clarity on what coexistence looks like for game fishing

Add to this the media exposure of the topic – advertising information events etc appears to have been disproportionately low compared with the importance and ramifications of the projects.

Perhaps the process is flawed. The Government lacks the expertise or will to keep on top of the subject and invites commercial proponents to develop the industry, and to write the rules for its industry as it progresses. The best example of this was outlined in the proposed changes to the Offshore Electricity Infrastructure Act 2021 (OEI Act) wherein it operates under the principle of shared use of the marine environment. In the more than two years since this act was passed there is no clarity on how shared use will work. Given the OEI Act provides for exclusion zones of up to one nautical mile in and around specific offshore renewable infrastructure, game fishers remain fearful they could be excluded from large areas of the ocean. The decisions on what the exclusion zones are to be is left to the proponents to negotiate or determine.

We understand that access restrictions will occur during construction, maintenance and decommissioning. One of the major omissions of the consultation process has been the understatement of the magnitude of disruption in terms of time, inconvenience and environmental damage.

Here are some facts that should have been provided for consideration in each and every proposed zone.

- The number of wind turbines planned
- The time it will take to get a project completed
- Exclusion periods during construction and maintenance
- The number of substations included
- Depth and extent of inter-field and export cabling
- The extent of subsea trenching and armouring for cables
- Shore crossing locations and infrastructure
- Whether wind farms will be floating or fixed to the seabed

All these issues if unknown can be addressed within reasonable limits. For them not to be addressed creates concern and mistrust which is the worst enemy of the projects.

Concerns for marine life

GFAA has made submissions on this topic to DCCEE and NOPSEMA. For the benefit of the Senate's Committee, we reiterate our concerns that are echoed by many other recreational fishing groups and individuals.

These can be categorised into aspects that are of particular concern for game fishers but relevant to biodiversity.

- Habitat destruction affecting forage species which in turn affects the prevalence of pelagic species. This particularly relates to cable trenching, reef destruction and other disturbance of the seabed and water column.
- Electromagnetic interference with the navigation of pelagic species. In all the areas proposed there are migratory highways used by fish that rely on the earth's magnetic field for navigation to spawning sites essential to their reproduction. Research on this topic is in its infancy but it may be critical to sustainability of species for recreational and commercial species.
- Emerging is concern about noise transmission to the water column and seabed from both turbines and blades. Likely very different frequencies with unknown effects on marine species. Simply there is not enough known about the impacts of changes to the environment from offshore wind energy to allow its widespread use as a saviour of the environment.

The impression is that the proponents, with the support of government, expect opponents to provide scientific evidence of negative impacts until which time concern and risk is not acknowledged. The responsibility for research lies with the proponents. Again a trust issue.

Economic impact

The social and health benefits of fishing appear not to have been addressed thoroughly. Neither has consideration of the potentially catastrophic economic impact on communities and industries that are to a greater or lesser degree dependent on recreational fishing, such as charter boats, retail, maintenance etc. A cessation of construction activities during the fishing season would be one remedy. The other would be significant compensation to affected businesses and communities.

GFAA's members are community members too and have wider concerns about the offshore wind proposition.

In closing, GFAA's position is not against offshore wind energy, however the practicalities of shared marine locations appear insurmountable. We would welcome engagement on this issue toward the objective of game fishers continuing to enjoy their sport without damage being done to the environment in which they operate.

Trust in policy clarity and details of what can be expected to happen is critical to the industry's support.

GFAA is also party to a submission from the Australian Recreational Fishing Foundation whose submission we strongly support.

Should you require further information please do not hesitate to contact me on
or president@gfaa.asn.au .

Yours faithfully,

Ian Bladin -President