

30 OCTOBER 2023

ACF Submission: Proposed offshore wind area: Pacific Ocean off Illawarra region, NSW

Introduction

The Australian Conservation Foundation (ACF) welcomes the opportunity to provide input into the Department of Climate Change, Energy, the Environment and Water's review of the siting of offshore wind, in the Pacific Ocean off the coast of the Illawarra region in New South Wales.

ACF is Australia's national environment organisation. We are half a million people who speak out for the air we breathe, the water we drink, and the places and wildlife we love. We are proudly independent, non-partisan and funded by donations from our community.

While ACF does not hold expertise in the proposed location of the offshore wind area, we make this submission to outline important environmental considerations when siting renewable energy in marine environments, and in support of the local communities and organisations committed to a renewable powered Illawarra region. This submission is aligned with [ACF's principles](#) that are good for nature and people.

ACF supports a renewable powered Australia, including offshore wind

ACF supports a renewable powered Australia because it is the single greatest action Australia can take to do our fair share to slash climate pollution, reduce global warming and protect people and nature. This means powering everything we can – our homes, transport, cities, farms, industries, and exports – with renewables. This will require a rapid and large-scale build of renewable energy, including offshore wind which will be an essential and significant element to meet Australia's renewable needs.

Renewables should be carefully planned and located so they are good for nature

Protecting and regenerating nature is an essential element to addressing global warming because nature absorbs carbon and maintains our climate. Our oceans and marine life are crucial to regulating the climate and will be at grave risk with runaway climate change, making them significant beneficiaries of renewable energy. It therefore makes eminent sense to ensure nature is protected as renewables are developed.

A tension exists between the need for rapid deployment of renewables and ensuring that renewable projects protect Australia's high-value ecosystems, habitats, and species. Carefully planned siting of renewable energy projects is one essential element to enable this protection.



Critical environmental considerations when siting offshore wind are:

1. **Map the conservation value of the region:** The Department should collate information on the conservation and ecological values of the proposed region, including threatened and migratory species and Matters of National Environmental Significance, and provide this information to the community.
2. **Protect high conservation value areas from development:** The Department should protect high-value ecosystems by excluding them from the development zone, including critical habitat for threatened and migratory species and ecological communities and marine parks.
3. **Fully assess threats to nature in the region:** The following threats will need to be assessed by the Department, and communicated to the community:
 - bird mortality from colliding with turbine blades and/or onshore transmission lines, and proximity to migration pathways and breeding and feeding grounds and seasons;
 - marine wildlife impacts, including mortality, injury, behavioural effects and broader ecosystem consequences associated with vessels, underwater noise and electromagnetic fields, or impact on migration pathways and breeding and feeding grounds and seasons;
 - seabed habitat degradation and transformation, and hydrodynamic change;
 - barrier effects or displacement effects due to presence of a wind farm;
 - pollution and introduction of invasive species.

It is important that this assessment is done cumulatively across the proposed area, and that a science-based and precautionary approach is taken.

4. **Ensure threats can be, and are, avoided, minimised and mitigated,** including through this use of global best practice and technology; and ensuring that offshore wind projects are assessed via the EPBC Act.

Renewables should be good for people, through shared benefits and jobs

It is vital that Traditional Custodians are engaged in this process, share in the benefits from developments on their sea country, and that free, prior and informed consent is sought.

The Illawarra offshore wind area should deliver benefits for people through good and lasting jobs, and helping the region and industry transform to a clean, sustainable and strong future. We commend the local communities and organisations striving for this outcome.

We are concerned about the mis-information campaigns that are spreading about renewable energy, including in the Illawarra region, supported by disingenuous actors. It is vital that the community is engaged throughout this process with factual information, and that the community understands that renewable energy, that is good for nature and people, is essential to addressing climate change and protecting all life.

