

DRI Position on Proposed Windfarm Developments in the Gippsland Declared Area (GDA)

May 2024

Summary

Since 1991, the Dolphin Research (DRI) Institute has worked to ensure a positive future for whales, dolphins, and their environment. As such, the DRI is concerned about emerging impacts on the marine environment, particularly those linked to climate change, which will exacerbate existing human impacts.

Urgent action is needed to mitigate these threats, including renewable energy, but not without the scrutiny of rigorous and independent environmental impact assessments to avoid unintended consequences.

The 1 May 2024 announcement of six Feasibility Licences to establish offshore windfarms in eastern Bass Strait, with another six to follow, offers a step to address energy transition but also poses significant questions regarding the potential impacts on marine mammals.

The DRI is concerned about a lack of accessible, quality data on cetaceans across the proposed development area – and some of what we do know seems to be changing.

Consequently, the Dolphin Research Institute recommends:

1. Rigorous Environmental Impact Assessments must be required for each windfarm project proposed for east Gippsland.
2. That assessments must address the impacts of construction, operation, and decommissioning and respond to the high-level questions listed later in this document.
3. That credible research regarding wind farms in the Northern Hemisphere is included in assessments.
4. Studies to urgently improve understanding of the ecology of marine mammals in eastern Bass Strait, the potential impacts from vessels and noise, and the cumulative impacts of new and existing risks.
5. Marine Mammal Observers are required to be on board vessels during high-risk actions.
6. Long-term monitoring of cetaceans is maintained beyond the construction phase and across the region beyond the Gippsland Development Area.

The Dolphin Research Institute's expansion of the Two Bays Whale Project further along Victoria's coast is a concrete action on our behalf to provide new data across a wider area on whale movements throughout our region. This will be available to all studies connected to the windfarm approvals process.

Context: Government Decisions

On 28 June 2023, the Australian Federal Government announced that areas within Commonwealth waters in the South and Southeast regions of Gippsland (eastern Bass Strait) would be allocated for offshore windfarm development. This area is now referred to as the Gippsland Declared Area (GDA).

On 1 May 2024, the relevant State and Federal Ministers made a further announcement: the awarding of six Feasibility Licences to companies, which permits them to begin detailed assessment work into the feasibility, environmental impacts, baseline environmental studies and management plans.

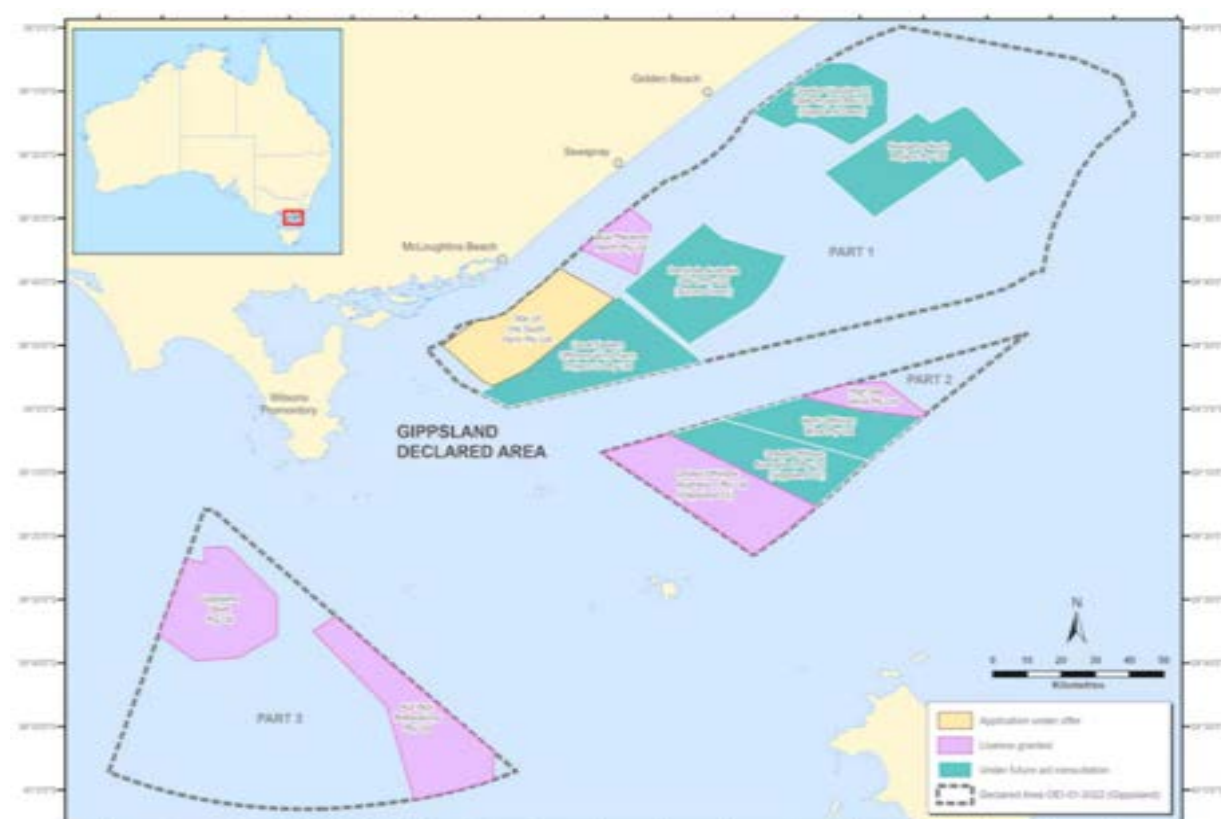


Figure 1: The map shows the location of the proposed offshore wind projects. Pink = licence granted, Yellow = Application under offer, Green = Under future act consultation, Dotted line = Gippsland Declared Area (GDA) (courtesy of the ABC and supplied: Office of Chris Bowen MP)

The Government intends to grant another six feasibility licences in the GDA, subject to First Nations consultation.

It is important to reinforce that these Feasibility Licences do not permit projects to commence but give six or potentially a total of 12 companies a level of surety to invest in the various studies to answer crucial questions before approvals to proceed will be given.

Context: cetaceans

The locations proposed for windfarm development in the GDA coincide with biologically important areas (BIAs) for two Environmental Protection, Biodiversity and Conservation (EPBC) Act-listed large whale species, the blue whale (*Balaenoptera musculus*) and the southern right whale (*Eubalaena australis*). In addition to this, the GDA is positioned in a well-documented and important migratory pathway for humpback whales (*Megaptera novaeangliae*), a species listed as “Critically Endangered” under the Victorian *Flora and Fauna Guarantee Act 1988*.

There is a lack of accessible, quality data on cetaceans across the wider GDA. However, the Dolphin Research Institute’s Two Bays Whale Project (a collaboration with citizen scientists and whale watch tour operator Wildlife Coast Cruises) confirms significant humpback whale feeding behaviour within the GDA. Photographic evidence shows some individual animals remaining in productive feeding locations for multiple days at a time.

While studies in overseas locations where well-established windfarms have shown little impact on cetaceans, these findings do not necessarily translate to the concerns around the proposed developments in the GDA.

Recommendations

The scale of the proposed windfarm developments presents significant risks and uncertainties that need to be considered through a rigorous assessment process. The Dolphin Research Institute recommends the following:

1/ Environmental Impact Assessments (EIA’s) are mandatory for each proposal, and the impacts of construction, operation, and decommissioning must be considered. These assessments should:

- Be independent and evidence-based, with robust scientific methodology and stakeholder engagement.
- All reports and findings stemming from EIAs to be peer-reviewed to ensure robustness.
- The studies should include surrounding waters with similar eco-physical features in areas not marked for development to provide regional context.

2/ Considerations and Actions:

Cetacean Ecology in the Region

- What is the importance of the GDA to cetaceans, particularly large whale species?
- What is happening in waters surrounding the GDA regarding cetacean presence and habitat use?
- What studies are underway or proposed to understand cetaceans' spatial and temporal presence?

- What learnings can we take from studies of the impacts of windfarm developments on cetaceans in the northern hemisphere, without assuming that everything is applicable to our region?

Vessel Impacts

- What will be the impacts of increasing the already significant vessel traffic?
 - Increased risk of vessel strike on cetaceans?
 - Vessels using dynamic positioning systems (DP) – Acoustic disturbance, potential displacement of animals and/or re-routing of migratory pathways.
 - Require Marine Mammal Observers on vessels during high-risk actions.

Noise

- Has sound propagation modelling been completed, and if so, what were the findings of this work?
- What is the impact of installing anchoring systems for turbines? - Acoustic disturbance, potential displacement of animals, and/or re-routing of migratory pathways?
- What is the impact of Pile driving? – Acoustic disturbance, potential displacement of animals and/or re-routing of migratory pathways?
- What effect is the noise associated with turbine operation? – Acoustic disturbance, potential displacement of animals and/or re-routing of migratory pathways.
- What is the impact of noise associated with the maintenance and decommissioning of turbines?

Cumulative Impacts

In addition to investigating specific elements (listed above), consideration must be given to the cumulative impacts of multiple stressors.

This should also consider pre-existing pressures in the region - dense commercial shipping traffic, tourism, energy connections across Bass Strait, oil and gas operations and commercial and recreational fishing. The decommissioning of oil and gas infrastructure in Bass Strait should also be considered.

Systems Approach

In addition to taking a wider geographical perspective into areas around the GDA, the Dolphin Research Institute recommends that long-term studies are maintained to understand the status of cetaceans in eastern Bass Strait in the decades ahead.

The Federal Department of Climate Change, Energy, the Environment and Water produced a significant guidance document in July 2023 to direct the impact assessment of offshore wind development. This is also a benchmark document that should hold the government accountable. Link: [Key environmental factors for offshore windfarm environmental impact assessment under the EPBC Act 1999 \(dcceew.gov.au\)](https://www.dcceew.gov.au/energy/offshore-wind/impact-assessment)

Dolphin Research Institute Response

The Dolphin Research Institute's expansion of the Two Bays Whale Project further along Victoria's coast is a concrete action on our behalf to provide new data across a wider area on whale movements throughout our region. This will be available to all studies connected to the windfarm approvals process.

Conclusion

Since its formation in 1991, the Dolphin Research Institute has maintained a strong evidence-based approach to many issues. Where possible, we have helped strengthen processes, contribute data, and will always weigh the evidence before forming a position.

Climate Change is the biggest existential threat to marine mammals, alongside other current threats we pose to these species and their environment. Urgent action is needed, but not without the scrutiny of detailed and independent questioning of the potential environmental impacts.

We call for rigorous, formal Environmental Impact Assessments for each offshore wind farm project proposed for Bass Strait. The questions posed above are high-level, and we consider them the highest priority.

The precautionary principle should be applied to decision-making about project approvals.

The Institute will actively contribute to the processes regarding windfarms where possible and maintain updated information on our website as new and trustworthy understandings become available.