



Hunter Bird Observers Club

Affiliated with BirdLife Australia

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The Hon Chris Bowen
Minister for Climate Change and Energy
House of Representatives
Parliament House
Canberra ACT 2600

27 March 2025

Emailed to: Chris.Bowen.MP@aph.gov.au

Dear Mr Bowen,

RE MEDIA RELEASE “NEXT STEPS FOR OFFSHORE WIND TO UNLOCK REGIONAL JOBS AND ENERGY SECURITY” (28th February 2025)

The Hunter Bird Observers Club (HBOC) expresses its disappointment with your announcement that a final decision has been made to offer a feasibility licence in the Hunter offshore wind zone.

Whilst HBOC strongly supports the transition to renewable energy systems we again object to the siting of the Hunter offshore wind zone.

HBOC previously lodged a submission opposing the wind farm proposal for the Hunter Coast offshore renewable energy zone. Our concerns focussed on the high probability of adverse impacts on migrating seabirds, locally breeding seabirds and endangered migratory shorebirds. Those concerns can be amplified.

There are significant Matters of National Environmental Significance (MNES under the EPBC Act 1999) in the lower Hunter and Port Stephens estuaries, associated wetlands and offshore islands, and this was acknowledged in the overview for the proposal. As a minimum, the proposed offshore zone should have been modified to exclude those sections where MNES had been identified and where impacts on biodiversity were likely, prior to the proposal for feedback being announced.

It appears that MNES are not important to this government and will be left to the proponents of proposed projects to ensure compliance. There is a strong feeling that this is just not good enough from a government that came into power on the back of promises to solve the issues of species extinction and declining biodiversity.

We noted with considerable displeasure the haste shown by the Minister in excising the Central Coast portion of this wind zone when residents complained of perceived impediments to their view. Yet the Hunter section containing known MNES remains unaltered to “unlock regional jobs and energy security”.

How regrettable that the government has shown such a lack of interest firstly in MNES and secondly in biodiversity generally in relation to this project.

Our serious concern and dismay with the government’s withdrawal under pressure, or in pursuit of votes, from its promised replacement of the EPBC Act 1999, the creation of ‘Environment Protection Australia’ to enforce the new Act, and Environment Information Australia has been further reinforced.

To again state the negative impact of this decision, we again emphasise that the section of coast incorporating the Hunter and Port Stephens estuaries is probably the most important section in NSW for migratory shorebird species, many of which are endangered and protected under international treaties. In addition, the coastline encompasses adjacent offshore islands on which colonies of threatened seabirds breed.

Seabird species such as Gould’s Petrel, Wedge-tailed Shearwater (up to 120,000 pairs) and White-faced Storm-Petrel, which all breed on the islands adjacent to Port Stephens, are likely to be adversely affected by blades on wind farm turbines. Lesser numbers of Short-tailed and Sooty Shearwaters also breed here and may also be impacted.

These birds return to their breeding and roosting islands under the cover of darkness as a predator avoidance strategy and will be even more susceptible to strike with the turbine blades 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 of the turbine blades.

In their study “Impacts on birds from Offshore Wind Farms in Australia” Reid, Baker, Woehler (2022) stated; *“Our risk-based approach showed that in the coastal and inshore sub-regions of Australia, migratory shorebirds, such as Bar-tailed Godwit and Eastern Curlew, feature heavily in the list of high-risk species. As these species tend to have well-defined distributions and migration pathways.....”*

In the “Coastal Regions” list, mentioned in the above study, five of the seven species with the highest risk scores are recorded in the Hunter/ Port Stephens Region. Several of these migratory shorebird species are already showing steep population declines.

In the “Offshore Regions” list, also mentioned in the above study, six of the nine species with the highest risk are again recorded in the Hunter/ Port Stephens Region. They are the Eastern Antipodean Albatross, Gibson's Albatross, Wandering Albatross, Campbell Albatross, Indian Yellow-nosed Albatross and Shy Albatross.

This gives considerable depth to our concerns that placement of wind turbines in the Hunter offshore wind zone will constitute an unacceptable threat to all of the above referenced species.

According to the Minister's press release *"During the feasibility stage, proposed projects need to undertake environmental assessments and seek approvals under the Environment Protection and Biodiversity Conservation Act 1999, to ensure matters of national environmental significance are protected."*

Given past experience, delegating responsibility for protecting biodiversity to project proponents or developers has proven to be unsatisfactory in terms of actually protecting biodiversity. The imperative is the project and the "avoid or mitigate" requirements of the EPBC Act 1999 are put second to the offsets option as it is easier to throw some money at the issue rather than trying to find suitable avoidance or mitigation strategies.

As an example, the offsets policy in NSW in attempting to satisfy the EPBC Act 1999, has been shown to be a failure and lacking integrity and transparency by the NSW Auditor General and by a Legislative Council Committee. The Committee found *"Through the course of the inquiry, it became apparent that there are multiple problems with the scheme, including serious flaws in its design and operation that raise fundamental questions about whether it can achieve the stated goal of 'no net loss' of biodiversity"*

Renewable energy should be easing the pressure on the extinction crisis not adding to it with sterilisation of ocean zones and clearing of woodland for solar or wind farms.

An environmentally thoughtful government would have utilised the already huge human footprint on this country by strongly supporting the installation of solar panels and batteries on all homes and commercial buildings, making all new subdivisions power self-sufficient; all preceded by encouraging an energy saving culture. These initiatives would have also benefitted Australians with their cost of living pressure.

HBOC supports the transition to renewable energy systems however we strongly object to the proposed siting of the Hunter offshore wind zone and due care for our natural world and biodiversity must require it to be moved.

Our regular surveys of the area in question will very clearly prove whether your government makes the correct decision. We do not wish to be the gatherers of data to prove that you did not.

Submission prepared by the Conservation Sub-Committee Hunter Bird Observers Club Inc.
27 March 2025

References

Overview of the Proposed Area – Hunter, New South Wales, Department of Climate Change, Energy, the Environment and Water, Canberra. 2023

Legislative Council – Report 16 - Integrity of the NSW Biodiversity Offsets Scheme. - November 2022

Reid, K., Baker, G.B., Woehler, E. (2022), Impacts on birds from Offshore Wind Farms in Australia, Department of Climate Change, Energy, the Environment and Water, Canberra.

Williams, D. (Ed) (2020) Hunter Region Annual Bird Report Number 27 (2019) (Hunter Bird Observers Club Inc.)

About the Hunter Bird Observers Club

Hunter Bird Observers Club Inc. (HBOC) was established in 1976 and currently has a membership of 400 members. Although the Club is based in Newcastle NSW membership includes members from other areas in NSW and from interstate.

Aims of HBOC

*to encourage and further the study and conservation of Australian birds and their habitat;
and
to encourage bird observing as a leisure-time activity.*

Activities include monthly regular outings, evening meetings, camps and field studies. HBOC promotes systematic field studies which include regular surveys by volunteers from the membership.

All data gathered from field studies are entered into the national bird record database administered by BirdLife Australia; Birddata <https://birddata.birdlife.org.au/>. Data are used to underpin conservation issues and HBOC promotes systematic surveys and data collection.

HBOC has a long history of working in collaboration with local councils, national parks and other state agencies, industry and schools.

For more information go to www.hboc.org.au