



Hunter Bird Observers Club

Affiliated with BirdLife Australia

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Notice of Proposal to Declare an Area of Pacific Ocean off Hunter, New South Wales

We thank the Department for the opportunity to provide feedback on the proposal.

Whilst Hunter Bird Observers Club Inc. (HBOC) strongly supports the transition to renewable energy systems we object to the haste and lack of planning in the potential growth and siting of proposed renewable energy zones both at State and Federal levels.

Our objection is further heightened by the apparent rush to float proposals and plans for massive renewable energy projects in "green field sites" much of it from companies focussed on grabbing the Australian electricity market. Many of these proposals will have negative impacts on biodiversity within the Hunter Region.

In relation to the Hunter Coast offshore renewable energy zone proposal by the Department of Climate Change, Energy, the Environment and Water (DCCEE) of particular concern to HBOC is the high probability of adverse impacts on migratory seabirds, locally breeding seabirds and migratory shorebirds. There is a lack of detail on how the impact on these species will be mitigated. From what we can ascertain according to the sub section Marine Users and Interests any Matters of National Environmental Significance (MNES) under the EPBC Act 1999 will be left to the proponents of proposed projects to ensure compliance.

MNES and migratory shorebirds

There are significant MNES in the lower Hunter estuary, Port Stephens estuary, wetlands and offshore islands and this is acknowledged in the overview for the proposal. As a minimum this proposed offshore zone should be modified to exclude those sections where MNES are identified and where impacts on biodiversity are likely. This should have happened prior to this proposal for feedback being announced.

Our strongest preference however is for wind turbines to be totally excluded from the offshore and inshore sections of the Hunter region due to the significant MNES and the high probability of impact again on migratory seabirds, locally breeding seabirds and migratory shorebirds.

The Hunter estuary is the most important estuary in NSW for migratory shorebird species many of which are endangered and protected under international treaties. The Port Stephens estuary also supports significant numbers of many migratory shorebirds. Species from the Northern Hemisphere and New Zealand migrate to the Hunter region to forage and roost in the estuaries and on the beaches. Some 30 migratory shorebird species utilise the Hunter and Port Stephens estuaries to rest and/or feed during their migration. Others stay briefly on their passage to points further south including as far as New Zealand. A wind turbine farm offshore from the estuary and beaches would pose an unacceptable risk to those species moving to and from the area.

Offsets

Given past experience passing 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. In many cases the offset options have been modified or downgraded to include alternatives that do not meet the “no net loss” criteria of the Act.

The offsets policy in NSW 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*

There appears to be a lack of foresight in releasing this proposal which appears to rely on an offsets system proven to be flawed. Has the DCCEEW considered the NSW parliamentary report into offsets?

Offsetting areas of ocean in a manner that enhances biodiversity is untested in Australia and is probably unachievable.

Growth

In addition to this proposal the previous NSW Government declared in December 2022 the Hunter-Central Coast Renewable Energy Zone which encompasses most of the Hunter Valley. Commercial parties have registered interest in 24 solar energy projects, 13 onshore and seven offshore wind energy projects, 35 large-scale batteries, and 8 pumped hydro projects. With so many independent initiatives in train what planning has been undertaken to match supply and demand?

In your own overview it is foreshadowed that *“The capacity of the Hunter-Central Coast REZ is likely to increase over time with the growth of offshore wind.”*

Potentially the floor of the Hunter Valley plus both inshore and offshore zones could be littered with renewable energy developments including a profusion of wind turbines. This will certainly add significant risk to avian access to the Hunter and Port Stephens estuaries, Stockton Beach and the current unrestricted access to and from the ocean.

Risk to avian species

In a study conducted by Reid, Baker, Woehler (2022) it was 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.....”*

This study also found:-

“In coastal regions the species with the highest risk scores were:

- *Orange-bellied Parrot Neophema chrysogaster*
- *Furneaux White-fronted Tern Sterna striata incerta*
- *Western Hooded Plover Thinornis cucullatus tregellasi*
- *Swift Parrot Lathamus discolor*
- *Shy Albatross Thalassarche cauta*
- *Far Eastern Curlew Numenius madagascariensis*
- *Anadyr Bar-tailed Godwit Limosa lapponica anadyrensis.*

The same species, except for Western Hooded Plover, were also the highest risk species in the inshore region.

In offshore regions in southern Australia the highest risk species were all albatrosses, including:

- *Northern Royal Albatross Diomedea sanfordi*
- *Eastern Antipodean Albatross D. antipodensis antipodensis*
- *Grey-headed Albatross T. chrysostoma*
- *Gibson's Albatross D. antipodensis gibsoni*
- *Wandering Albatross D. exulans*
- *Campbell Albatross T. impavida*
- *Amsterdam Albatross D. amsterdamensi*
- *Indian Yellow-nosed Albatross T. carteri*
- *Shy Albatross Thalassarche cauta.”*

In relation to the Coastal Regions list above five of the seven species with the highest risk scores are recorded in the Hunter Region. They are the White-fronted Tern, Swift Parrot, Shy Albatross, Far Eastern Curlew and Bar-tailed Godwit. (Whilst the *Limosa lapponica anadyrensis* sub species of the Bar-tailed Godwit has not been recorded here *Limosa lapponica baueri* is recorded all year round.)

For the Offshore Regions list above six of the nine species with the highest risk are again recorded in the Hunter 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 development of wind turbine zones in offshore and inshore waters adjacent to the Hunter Region coast will constitute an unacceptable threat to those species.

Moreover there are other seabird species such as Gould's Petrel, Wedge-tailed Shearwater and White-faced Storm-Petrel which breed on the islands adjacent to Port Stephens which will certainly be adversely affected by turbine blades on wind farm turbines. This impact may be direct by impact or indirect by aversion to possible alternative foraging areas.

Until recently the Australian Gould's Petrel *Pterodroma leucoptera leucoptera* (Endangered EPBC Act 1999) bred nowhere else other than the island offshore from Port Stephens. It has recently established a small breeding colony on Montague Island, but even so, the vast majority (~90%) of

Australian Gould's Petrels still breed on Cabbage Tree Island, just off the Port Stephens coastline. The numbers of Wedge-tailed Shearwater breeding on these islands are also significant, at up to 120,000 pairs. Lesser number of Short-tailed and Sooty Shearwaters also breed here. Of importance, these birds return to their breeding islands under the cover of darkness as a predator-avoidance strategy and they will be even more susceptible to strike with the turbines 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 for the turbine blades.

On a broader scale

There should be a political imperative to embrace energy-saving options prior to opening up renewable energy zones to industry.

There is already a huge human footprint on the land with housing and cities that could be utilised to provide power. Why create further destructive footprints on the environment when the existing footprint could be utilised more fully by adding solar panels and batteries to every house and commercial building plus mini wind generators? Why can't commercial buildings also have solar panels on the inside to utilise light coming in from windows (e.g. in corridors) and to reuse light from internal lighting? Make solar banks and neighbourhood batteries mandatory for all new subdivisions. Then look at providing for the shortfall, heavy industry and peak load requirements from large scale renewable energy facilities.

But the first initiative should be in stopping the waste.

The installation of sensor lighting and timers in commercial buildings should be mandatory. Timers should be installed on advertising hoardings switching them off at a set time or making them illegal unless power self-sufficient. A campaign to encourage consumers to be energy efficient should also be initiated.

Conclusion

There are too many unknowns in relation to the nocturnal movements of seabirds and migratory shorebirds coupled with the possible interference/disruption with passage and activities of the marine organisms on which these birds feed to press ahead with construction of these enormous structures which are potentially dangerous to the rich biodiversity of the Hunter and Port Stephens regions.

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.

Therefore HBOC strongly urges that the precautionary principle be applied and the Hunter Coast offshore remains free of wind turbines due to MNES and the high numbers of migratory and threatened species utilising the Hunter and Port Stephens regions.

Submission prepared by T. Kendall on behalf of the Conservation Sub Committee, Hunter Bird Observers Club Inc. 24 April 2023.

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; Birdata <https://birdata.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