

# Australian Conservation Foundation

Submission: Proposed offshore wind area: Indian Ocean off Bunbury, WA

Addressed to: Offshore Renewables Team, DCCEEW

Submission from: Australian Conservation Foundation  
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## About the Australian Conservation Foundation

The Australian Conservation Foundation is Australia's national environment organisation. Since 1965, we've protected the nature we all love – our unique wildlife and our beautiful beaches and bush.

Driven by the power of people, we won World Heritage listing for the Great Barrier Reef and Kakadu National Park and returned precious water to the rivers of the Murray-Darling.

We influence governments and businesses to protect the animals, rivers and reefs close to our hearts and hold decision-makers to account without fear or favour. Everything we do is evidence-based and helps nature and people thrive for generations to come.

We won't give up until Australia's nature is protected and regenerated.

The Australian Conservation Foundation acknowledges that First Nations Peoples of Australia hold unique knowledge and rights inherited from their ancestors and Country and have cared for this country since time immemorial. We pay our respect to First Nations Peoples of Australia, past, present and future. We respect their leadership in caring for Country and support their rights to continue to do so. We recognise that sovereignty was never ceded, and that colonisation was unjust, often violent and continues to adversely impact on First Nations Peoples today. As Australia's national environment organisation, we understand we have a responsibility to help right this historical wrong. We support their authority to speak for Country, right to self-determination and recognise that rightful recognition of and genuine reconciliation with First Nations Peoples is fundamental to protecting nature in Australia. We support First Nations-led campaigns that protect Country and seek win-win outcomes for our environment and for the rights, wellbeing and advancement of First Nations Peoples

To find out more about the Australian Conservation Foundation's work visit [www.acf.org.au](http://www.acf.org.au)



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## 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 Indian Ocean off the coast of the Bunbury region in Western Australia.

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.

ACF is a strong supporter of renewable energy because climate change, fuelled by the burning of coal and gas, is accelerating biodiversity decline and extinction. The Great Barrier Reef, for example, is today (12 April 2024) experiencing its fifth catastrophic mass bleaching event in eight years as a result of elevated ocean temperatures.

All infrastructure projects, including renewable energy developments, should avoid harmful impacts to nature, and where impacts are unavoidable, deliver sustainable and durable gains for nature.

We make this submission to outline important environmental considerations that must be addressed when deciding zones for siting renewable energy in marine environments. This submission is aligned with ACF's position paper: [Energy that is good for nature and people](#)

## Recommendation Summary

### Recommendation 1:

ACF strongly supports a renewable powered Australia, including energy generation from offshore wind, because well-sited renewable energy is essential to protect nature and people from dangerous climate change.

### Recommendation 2:

Make renewable energy infrastructure development good for nature by integrating biodiversity considerations and protections at the planning, design, construction, operation and decommissioning phases.

### Recommendation 3:

Make renewable energy infrastructure development good for people, by ensuring the consent of Traditional Owners is obtained, benefits are shared, and secure and meaningful jobs are created.



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## Recommendation Detail

### Recommendation 1: ACF strongly supports a renewable powered Australia, including energy generation from 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.

Nature needs well-located renewable energy. The risks that runaway climate change would pose to our native plants, animals, and ecosystems if we do not take urgent action to transition to a renewable powered Australia are catastrophic. As the [Chair of the IPCC recently noted](#) "we will see new risk ...emerge associated with sea level rise, permafrost degradation, biodiversity loss, water scarcity, more extreme weather, food insecurity... If we do not act now, we close the option of limiting warming to 1.5°C as we will have used up the available carbon budget around the end of this decade, even with the current set of nationally determined contributions".

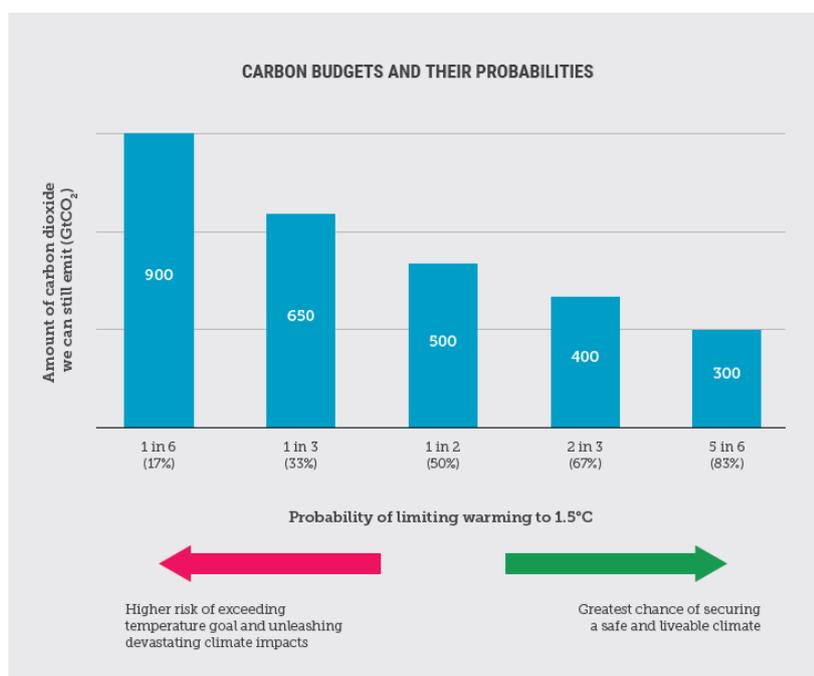


Figure 1: Graph illustrating how for a greater chance of limiting warming to 1.5C, and thereby a greater chance of avoiding the disastrous impacts of exceeding this target, we must start with a smaller carbon budget.

Source: [Climate Council Mission Zero Report](#)

Australia's [precious coral reefs](#) are already at risk, with past, current and predicted coral bleaching events caused by warming seas. Aquatic ecosystems and biodiversity are also among the most vulnerable to climate change. Aquatic ecosystems in coastal areas are also affected by sea level rise and storm surge associated with intense storms. Along with structural changes and damage, these will bring changes in water salinity that can have [long-term effects on wetland flora and fauna](#).

The imperative to build sufficient new renewable energy infrastructure to replace our reliance on fossil-fuel based energy, and minimise our use of our remaining carbon budget, is clear. We must power everything we can – our homes, transport, cities, farms, industries, and exports – with renewable energy, as soon as possible.



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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 energy needs.

Wind energy is a uniquely efficient source of renewable energy. Wind infrastructure occupies less space and is far less intrusive to nature than fossil fuel mining or burning. Harvesting wind energy complements our solar farms, providing electricity when the sun isn't shining. Co-locating renewable energy with existing land use provides opportunities for farmers and other land holders to complement and stabilise their incomes by harvesting nature's energy and powering the country.

Offshore wind requires far less land than onshore wind, while harvesting some of the most powerful wind resources in the world. Offshore wind could provide positive biodiversity benefits, not only protecting nature from climate change but helping nature thrive. For example, [international studies](#) have shown the artificial reef effect of offshore windfarms could result in "doubling of species richness and a two-order-of-magnitude increase of species abundance"

## **Recommendation 2: Make renewable energy infrastructure good for nature by integrating biodiversity considerations and protections at the planning, design, construction, operation and decommissioning phases.**

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 sense to ensure nature is protected as renewable energy is developed.

The challenges of needing to rapidly expand renewable energy production, distribution and consumption creates an opportunity to design an energy system that is good for nature and people.

[As outlined by the OECD](#) "Scaling up renewable power while halting and reversing biodiversity loss demands an integrated approach that capitalises on synergies, minimises trade-offs and averts unintended consequences. It requires governments to systematically integrate both climate and biodiversity objectives throughout electricity planning and policy." This will not only mitigate adverse impacts on biodiversity, but can also expedite renewable power approvals, reduce project delays and cancellations, and avoid greenhouse gas emissions from ecosystem damage and destruction.

ACF calls on the Commonwealth government to apply best practise, evidence-based policy standards at every stage of the renewable energy transition. By setting standards for best practise at every phase of renewables development, solutions to this tension can be found and implemented.

### **Planning phase – Site renewables right**

While more offshore wind is urgently needed, it is just as important to locate it in the right places. The precautionary principle should apply when there is uncertainty regarding the impact of offshore renewable energy infrastructure on marine and migratory species. Carefully planned siting of renewable energy projects is essential.

**a) Map the conservation values 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. In the case of the Bunbury offshore wind area these include, but are not limited to:

- The Geopraphe and South West Corner Commonwealth Marine Protected Areas



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- Migration, feeding and resting areas for EPBC listed Humpback and endangered Blue Whales
- Feeding areas for EPBC listed migratory and marine bird species including the flesh-footed shearwater and Little penguin.

This and other information on conservation values should be clearly documented and provided to stakeholders and the community.

**b) Protect high conservation value areas from development:** The Department should protect high-value ecosystems by excluding them from the development zone with appropriate buffers for important marine conservation values including known whale and seabird migration, resting and feeding areas, critical habitat for threatened and migratory species and ecological communities and the Geopraphe and South West Commonwealth marine parks. This may require investigating alternative locations in the region to ensure the new zone is declared in the most appropriate area. Once the most appropriate zone location is selected, the Department should establish “no net loss” (or “net biodiversity gain”) requirements for all projects, accompanied by robust metrics and methods for verification.

**Design, Construction, Operation and Decommission phases:** Avoid harm, via the mitigation hierarchy, and support nature by mainstreaming biodiversity objectives. Various solutions for mitigating negative impacts of renewable infrastructure exist, ranging from appropriate siting to improved project design. These solutions continue to be tested and refined, as experience and evidence increase. [Digital technologies including machine learning and artificial intelligence](#) provide new opportunities for the industry to monitor and cost-effectively mitigate impacts on biodiversity. Through strategic design and effective governance, governments can scale up such solutions:

**a) Fully assess threats to nature in the region:** The following threats will need to be assessed by the Department, publicly communicated and addressed through requirements for improved project design.

- bird mortality from colliding with turbine blades, and proximity to migration pathways and breeding and feeding grounds and seasons.
- marine wildlife impacts, including mortality, injury, behavioural effects and broader ecosystem impacts
- consequences associated with vessels, construction, 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.

**b) 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.

**c) Support nature by mainstreaming biodiversity objectives**

There are numerous strategies to be implemented to ensure projects not only avoid harm (like further improving turbine designs to protect species from risk) but provide actual benefits for nature. Implementing these strategies would help ensure that offshore wind projects are not just protecting nature, but helping nature thrive.



For offshore wind, for example, we can look to the research into artificial reef development at offshore wind facilities to support shellfish. [Further recommendations](#) from the OECD include:

- Adopt standards to promote infrastructure designs and operational practices with lower-risk to biodiversity (e.g. bird-safe power-line design; minimum cut-in-speed for wind turbines).
- Require post-construction monitoring and reporting to ensure that environmental assessment recommendations and permitting requirements are respected and to inform adaptive management.
- Integrate biodiversity criteria into tenders for renewable power projects to incentivise companies to go beyond regulatory requirements.
- Establish or endorse certification schemes with science-based criteria to encourage power sector projects to seek positive biodiversity outcomes.
- Encourage power companies to adopt ambitious biodiversity targets, a plan to achieve the targets and a methodology for assessing progress. Collaborate with power companies on proactive conservation actions.

### **Recommendation 3: Make renewable energy infrastructure development good for people, by ensuring the consent of Traditional Owners is obtained, benefits are shared, and jobs are created.**

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

The Bunbury offshore wind area should deliver benefits for people through secure and meaningful jobs, 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 concerted dis-information campaigns that are spreading about renewable energy, supported by disingenuous actors. It is vital that the community is engaged throughout this process and supported with easily accessible, credible, factual and trusted information and opportunities to discuss projects.





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