



# Australian Marine Conservation Society

## POSITION PAPER

February 2024

### AMCS supports Australia powered by 100% renewable energy.

Generating our energy through renewable sources is undeniably good for people and the ocean.

In contrast, burning coal and gas is harming the ocean, driving marine heatwaves and causing the ocean to become more acidic. In recent years, successive heatwaves have damaged some of our most cherished ocean ecosystems.

To protect our ocean and its extraordinary wildlife, it is essential to replace coal and gas. This requires a massive build of renewable energy infrastructure this decade, including offshore wind farms.

This rapid transition can and must be done in a way that protects nature. Protecting nature must be a top priority during the development of new renewable energy.

Coastal communities must also be informed and genuinely consulted about proposals for all individual renewable energy developments. Free, prior and informed consent from First Nations people should be attained before approval decisions are made.

### The Challenge

Our oceans are already feeling the heat of climate change. For example, our Great Barrier Reef has experienced four marine heatwaves since 2016, leading to corals bleaching and dying. So far, our Reef has shown resilience, but climate pollution must rapidly decline this decade for this to continue. The waters off Tasmania have become a global warming hotspot and, as a consequence, the giant kelp forests off Tasmania's coastline have declined dramatically. Warmer waters in Antarctica mean less ice cover impacting feeding grounds for whales like humpbacks that migrate to our shores.

It is clear, the future of our oceans and their amazing wildlife depends on an urgent transition from coal and gas to renewable energy. This will require a massive build of solar and wind infrastructure and a transmission grid capable of delivering renewable energy.

Offshore wind farms are a significant part of the national plan to avoid dangerous climate change. They must be sited, built and operated in a way that is sensitive to the ecosystems in which they're located and the process must address the concerns in the community.

To meet this challenge, AMCS has developed a set of guiding principles to support the appropriate location and development of offshore wind farms. These principles must help guide decision-making for the benefit of people, our climate and our ocean and its extraordinary wildlife.

## Guiding Principles

### **Protect the Ocean and Wildlife**

*Principle 1: Protect and restore the ocean and its wildlife.*

Australia's environmental laws are currently being rewritten. The new laws must ensure that the conservation and protection of the ocean and its biodiversity are at the heart of environmental assessment and decision-making and must cover all new developments including offshore wind farms. The laws should ensure the community has a legal voice to stand up for the ocean and truly value and respect the rights, knowledge and cultures of Australia's First Nations People.

*Principle 2: Put offshore wind farms in the right places*

Australia is blessed with an extraordinary coastline. We are surrounded by three oceans – Pacific, Southern and Indian – and several seas. Our ocean wildlife is globally significant and much of it is unique to Australia. Our oceans provide habitat for migratory species: whales, turtles and seabirds.

Assessment of offshore wind farms must consider the environmental, biodiversity and cultural values of the proposed location and its surrounds. Some areas are simply too important and should be set aside from development. Examples include marine World Heritage sites, such as the Great Barrier Reef, Ningaloo and Lord Howe Island; marine parks; and wetlands of international importance.

### **Listen to People**

*Principle 3: Free, Prior and Informed Consent of First Nations people*

First Nation peoples connections to Sea Country have existed for millennia. Governments must invest in genuine engagement with First Nations people if consent is to be attained. Governments should follow the principles of free, prior and informed consent, as outlined in the *UN Declaration on the Rights of Indigenous Peoples*. Where consent is given to an offshore wind farm, governments must ensure that First Nations people benefit from the development on Sea Country.

*Principle 4: Inform and consult local communities early, well and genuinely*

Australians care deeply about the ocean. Local communities are intimately connected to the marine life on their doorstep. Whale and shorebird migrations are an annual event for many coastal communities across eastern, western and southern Australia.

Governments have a responsibility to ensure local communities are informed early about potential offshore wind farms and have the opportunity to be genuinely involved throughout the assessment process. This is critical for good decision making and to ensure Australians' strong support for renewable energy is to be maintained.

### **Good Planning**

*Principle 5: Use marine spatial planning*

The federal government has adopted a regional planning approach to renewable energy zones on land. Likewise, it should adopt a marine spatial planning approach to renewable energy infrastructure in the ocean.

Marine spatial planning is a technical term meaning planning across large marine regions that covers all commercial and non-commercial activities. The goal is to ensure the protection of biodiversity and the sustainable use of our oceans by marine-based industries. The federal government should work

with state and territory governments to collaborate on marine spatial planning, including the roll out of energy infrastructure in the ocean.

*Principle 6: Be science-based, consider all pressures and be transparent*

Australia has jurisdiction over a vast and ecologically diverse ocean territory from the tropics to sub-Antarctic regions. Our knowledge of the ocean is considerable but we are still discovering new species and still learning about the species we have identified. We are still mapping ocean habitats to a high resolution.

The assessment of offshore wind farms should be based on the best available data. Where that is lacking, the federal government should invest in mapping of habitat and species distribution to understand potential impacts.

It is essential that the government considers the cumulative impacts of offshore wind farms as our oceans are already under pressure from other activities: fishing, oil and gas development, plastic pollution and poor water quality.

The government must make all relevant information publicly available.

### **Good decision-making**

*Principle 7: Apply the precautionary principle in decision-making*

In the absence of comprehensive knowledge, it is wise to be cautious. As offshore wind farms are new in Australia, we don't have a very high level of confidence in understanding the potential impacts from their construction or operation. Government must therefore adopt a precautionary approach to decision-making.

*Principle 8: Make offsets the last resort*

Historically, governments have approved developments in ecologically important areas on land provided the developer 'compensates' for habitat loss by revegetating somewhere else. This is referred to as an 'offset'. Offsets have a poor reputation as, more often than not, they have failed to deliver net conservation gains for the environment.

Some areas are too ecologically important to approve offshore wind farms on the basis that offsets will be used. Where offshore wind farms are approved with offsets outside ecologically important areas, net conservation gains for the ocean must be made. Offsets should be a last resort and should be strictly applied, monitored and enforced.

## **Looking Forward**

The science is clear: the world must limit global warming to 1.5°C above pre-industrial levels to avoid the most dangerous impacts of climate change.

The health of our ocean, our life support system, depends on it.

This is the critical decade for action at the scale and pace needed to turn emissions around and limit global warming.

Offshore wind farms are a significant part of Australia's effort to keep 1.5C alive, but development must be done in a way that protects nature.

With right planning and right decision-making – **that has the protection of the ocean and its incredible wildlife and genuine engagement with coastal communities at its heart** – AMCS believes Australia can do this.