

City of Mandurah submission for Australia's offshore wind areas: Indian Ocean off the Bunbury region WA

The City of Mandurah (the City) appreciates the opportunity provided by the Federal Government to provide a submission on the proposed offshore wind area: **Indian Ocean off the Bunbury region WA**. The City understands that this proposal relates to and is a key component of the Federal Government's approach to realising Australia's Large-scale Renewable Energy Target of 33,000 gigawatt hours of extra renewable electricity each year and more broadly that the proposal seeks to contribute to Australia's path to Net Zero by 2050.

The City has been a long-time advocate for action to be taken by state and federal governments towards addressing climate change concerns and supports the overarching intent of this proposal. However, the City also appreciates that offshore windfarms present other social and environmental concerns. These need careful and timely consideration in the decision-making process in order to achieve a well-balanced outcome and not one that compromises other environmental and social values for the sole purpose of decarbonisation.

The City would like to outline concerns in relation to this proposal and suggest some solutions by which they could be effectively addressed.

Community consultation process

The Mandurah community is passionate about our natural environment and readily engages on issues that have potential to impact it. This has been repeatedly demonstrated through various consultation processes delivered by the City, including our Strategic Community Plan, Environment Strategy and Community Perception surveys. It is imperative that adequate information is provided to the community when seeking their input, so that commentary can be as informed as possible and engagement is constructive. The information provided by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to facilitate community engagement for the proposed offshore wind area has been minimal and the means for community members to better understand the proposal and provide their informed comment has been limited.

The City is concerned that the community engagement approach to date has failed to adequately reach and engage constructively with our local community. Therefore, community feedback that is being used to inform the Minister's decision to declare the proposed area as fit for purpose for offshore wind farms, will not be as informed as it should be.

Specifically:

The public consultation process allows for 60 days prior to the Minister making a significant decision. This timeframe is demanding when considering that promotion of the proposal has been very limited prior to the commencement of the consultation process, resulting in a general lack of awareness amongst community.

The DCCEEW website landing page for the proposal has very limited information and contains links to other pages for further generic information, such as a **Guidance document: Key Environmental Factors for offshore windfarm environmental impact assessment under the EPBC Act 1999**. These documents are complex and not easily discoverable, meaning accessibility for general members of the public who may have an interest in the proposal is limited.

This issue of accessibility was potentially being addressed through the delivery of community sessions held from 19-21 March 2024 in the region. However, these sessions were not well-promoted in terms of providing adequate and broad notice. Further, there was one Mandurah workshop only, which was held during working hours. From an accessibility viewpoint, this meant the workshops could only have been attended by a limited part of the community and hence only marginally improved the ability for general members of the public to engage with the consultation process.

The City feels that the consultation process, which is being conducted to inform a significant decision by the Minister, has not adequately allowed for constructive and well-informed feedback from the Mandurah community. The City suggests a more comprehensive community engagement approach is required that includes:

- More appropriate timeframes that allow members of the public to
 - be made aware of the proposal;
 - digest complex but relevant information presented in an easily located and common webpage, or similar platform; and
 - have ample time to consider the proposal carefully and create a well-informed response.
- Practical and accessible opportunities for all members of the public to further discuss this proposal and the relevant information in detail with the Department, in order to clarify matters where information presented is not easy to understand.

City concerns in relation to direct potential impacts of the proposal to the Mandurah community

According to the DCCEEW website, the proposed offshore wind area is located approximately 20 kilometres from the Mandurah coastline, commencing at a latitude that is approximate to the City's southern boundary. It could be perceived that there would be relatively minor impacts to the City of Mandurah. However, as outlined above, for a community that is passionate about its natural environment, the City views the following impacts as not insignificant:

Amenity impacts

The DCCEEW website displays a digital rendering from the Dawesville coastline looking southwards to the proposed offshore wind area. This rendering depicts an interrupted view of the horizon across the ocean, presenting an industrial setting as opposed to an open natural ocean. Given the Mandurah community prides itself on its natural setting, this is not an insignificant impact to amenity.

One of the City's key strategic actions in its economic strategy is to facilitate the development of infrastructure within Yalgorup National Park and the adjacent coastline with the purpose of facilitating increased eco-tourism and nature-based tourism in this location. The City has partnered with the Western Australian State Government and local private landholders, already attracting initial investment over \$1 million to further these plans. The industrial look of the proposed offshore wind area presents a significant conflict with the current amenity that the City is seeking to protect in this location as well as leverage economic benefits from.

Further, the Yalgorup initiative has been drawn from and developed with great sympathy towards the values of the Mandurah community. These values have been identified by the

City through continuous and long-term community engagement processes and is predicated on:

- Mandurah's humble beginnings as a fishing village in a setting of immense natural beauty.
- A community that is engaged, empowered and passionate about influencing what happens in its region, and
- An ambition to create a thriving regional city that maintains the heart of a village.

The City understands the strategic reasons for why the proposed wind area has been located off the Mandurah coastline in terms of regional energy demand and existing port infrastructure nearby. However, the City believes the Minister should equally consider how the proposal contributes to the sense of place of the region and that the Department should test its proposal against that measure more carefully through the public consultation process to properly inform the Ministers decision.

Lack of local benefit to the Mandurah community

The City appreciates that with any proposal, such as the offshore wind area, there will be a trade-off between benefits and consequences. With regard to this proposal, the Mandurah community stands to experience consequences in relation to its natural amenity as well as existing investment in improving the local economy. However, it is not evident how the Mandurah community would receive any direct benefits from this proposal. Instead, those benefits are likely to be realised outside of Mandurah and the broader Peel region. The DCCEEW website identifies the Port of Bunbury and surrounding region as an area that will benefit.

The City suggests that if communities other than those in the Bunbury region are expected to bear some level of consequence as a result of this proposal, then the Federal Government should also design mechanisms through the development of this proposal that will ensure these communities, such as Mandurah, receive some level of direct benefit too.

Environmental concerns

The City has reviewed the **Guidance document: Key Environmental Factors for offshore windfarm environmental impact assessment under the EPBC Act 1999** available on the DCCEEW website. The document lists a number of factors related to environmental concerns and offshore windfarms and appreciates that these need to be addressed by proponents applying for feasibility licenses pending the Minister declaring the proposed area as suitable.

Prior to issuing proponent feasibility licenses, the Minister will be making a significant decision that will determine whether offshore wind farms are generally suitable to be located in the proposed area. The DCCEEW website details reasons as to why this area is suitable for wind farms from an energy demand, decarbonisation and local employment perspective, which are aspects that can be applied to any coastal community in Western Australia. However, the City cannot locate any assessment as to the suitability of the area from an environmental impact perspective.

Following a briefing to the City from DCCEEW officers, we understand that preliminary environmental assessments, including review of matters such as bird strikes, whale migration patterns and potential impacts from underwater noise, have been conducted by the

Department. Outcomes and findings of these assessments should be made available through the public consultation process to better facilitate the input of local knowledge from stakeholders and ensure the Minister can make a determination with the best available information. All factors related to the decision should and can be addressed in some form, for example defence related matters, without having to disclose confidential information.

The City would also like to suggest an additional environmental factor that should be considered and emphasised in the **Guidance document: Key Environmental Factors for offshore windfarm environmental impact assessment under the EPBC Act 1999**. This is the potential impact on waste streams and waste management that offshore windfarms may generate. Currently, turbine blades are a significant waste stream for regions that have windfarms located in or near them and limited recycling options are available for the materials used. Unless properly considered, the disposal of materials from blade turbines has potential to cause a significant impact on local waste management systems and landfill facilities. Proponents and the federal government should know the solutions for recycling and disposal of materials and also outline the impacts of waste management practices as a requirement of their feasibility investigations.

Following the Department's briefing to the City, it is understood these matters are intended to be addressed through the feasibility licensing and management plan stages. However, the City believes that if the federal government intends to facilitate offshore wind farms as part of the solution to achieve the Net Zero by 2050 target, then before it explores the feasibility of locations for offshore windfarms, it should place its own focus and efforts on the development of turbine blade recycling options.

Opportunities for Mandurah

Notwithstanding the City's desire to have the above-mentioned concerns addressed by the Department, the City would like to propose an opportunity it has identified that would assist in addressing these concerns.

The City would like to suggest that should the proposal for an offshore wind area be agreed to by the Minister, the federal government should strongly consider establishing a fund collecting annual contributions from approved proponents of wind farms. These funds should then be used to finance research focusing on identifying methods to quantify and reduce environmental impacts of offshore wind farms, specific to the Indian Ocean off the Bunbury region site.

Conclusion

In summation, the City has identified some significant limitations in the consultation process and a failure to provide stakeholders with critical information regarding potential and perceived environmental impacts relating to the **Offshore Wind Area: Indian Ocean off the Bunbury region WA** proposal.

The City believes that these limitations and the insufficient information provided as part of the consultation should be effectively addressed by the Department before the Minister is asked to make an informed decision as to whether the area should be declared as suitable for offshore wind farms. Once these have been addressed, it is recommended that consultation start again before any decision to declare the area as a suitable offshore wind farm area is made.