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Department of Climate Change, Energy, the Environment, and Water
Ngunnawal Country
51 Allara Street
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Submitted online

13 November 2023

Dear Minister

Proposed offshore wind area: Pacific Ocean off Illawarra region, NSW

[Vets for Climate Action \(VfCA\)](#) is leading the Australian veterinary and animal care Industry into a future where animals, the industry, our communities and the natural world are thriving. We are an animal-centred, vision-led and impact-driven organisation. We are evidence-based and informed by published scientific findings.

We represent over 2000 members of the veterinary profession and animal care community around Australia, including over 700 in NSW, many of whom reside on the NSW coast. Veterinary professionals are on the frontline, experiencing climate change firsthand. We see the devastating impacts that floods, bushfires and heat stress have on our livestock, pets and wildlife (such as the inconsolable loss of 3 billion animals in the bushfires of 2019/20). We also understand that animal health has a critical position in our future, whether the diversity of native wildlife contributing to a sustainable environment, the livestock that contribute to our food security or our much-loved pets.

Vets for Climate Action welcomes the opportunity to provide feedback in support of the proposed area being declared for offshore renewable energy in the Pacific Ocean in the Illawarra region of NSW.

Environment: Key benefits or opportunities related to the environment for offshore wind in this proposed area

Vets for Climate Action supports appropriate development of offshore wind projects. The development of, and investment in, offshore wind will complement Australia's incredible on-shore solar and wind power resources and together provide Australians with sustainable energy day and night and remove the need to rely on gas and coal for energy production. We understand that offshore wind offers many advantages in terms of its generation capacity and reliability of winds.

Replacing fossil fuel-based energy with renewable energy, like wind and solar, will help reduce greenhouse gas emissions which have unequivocally caused climate change. The largest share and growth in gross GHG emissions occurs due to the mining sector and combustion of fossil fuels.¹

The importance of reducing GHG emissions to zero this decade, and therefore using renewable energy like offshore wind, cannot be overstated. In scenarios assessed by the IPCC in its Sixth Assessment Report, limiting warming to around 1.5°C requires global greenhouse gas emissions to peak before 2025 at the latest, and be reduced by 43% by 2030.² The consequences of exceeding 1.5°C will be stark: heatwaves, droughts, bushfires and intense rain events will become even more severe. Sea levels will rise, species will become extinct and crop yields and livestock production will fall. This will cause further food and water insecurity, economic disruption, conflict, and terrorism.³

As vet professionals, we recognise climate change is an animal health and welfare issue. Climate change has caused, and is causing, substantial damage to terrestrial, freshwater, cryospheric, and coastal and open ocean ecosystems, driving the local loss of species both on land and in the ocean.⁴ Many animals have already perished in Australia due to heatwaves and severe weather events. Additional details are presented in **Appendix 1** below.

Therefore it is incredibly important to Vets for Climate Action that the design and construction of the offshore wind project has minimal impact on whales, dolphins,

¹IPCC, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 1-34, doi: 10.59327/IPCC/AR6-9789291691647.001

² IPCC, 2022: [Summary for Policymakers. In: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change](#) [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001, accessed 24 October 2022

³ United Nations, [The Climate Crisis – A Race We Can Win](#), 2020, accessed 24 October 2022

⁴ Ibid.

birdlife and other wildlife. We ask that the Government give special attention to migration routes, breeding grounds and foraging areas of wildlife, and engage proper environmental scrutiny including environmental impact statements, and engagement with the relevant stakeholders and regulators like NOPSEMA⁵.

The biggest threat to our much loved wildlife and oceans is climate change (caused by fossil fuels), and oil and gas projects. This is why Vets for Climate Action support this proposed offshore wind area.

Community and onshore transmission: Key benefits or opportunities related to the community and onshore transmission for offshore wind in this proposed area

Vets for Climate Action sees the key benefit to the community of using offshore wind as reducing the impacts of changing climate for all Australians, and our animals.

We also recognise the benefits of the continued development of the renewable energy sector as a source of direct and indirect jobs, both now and into the future. This is through the manufacturing, construction and maintenance of the offshore wind infrastructure, as well as continued research and development into this growing area of technology.

Vets for Climate Action also knows that switching to renewable energy can provide considerable economic savings for consumers.⁶ It has lower costs than the cheapest coal-fired offerings and the cost of electricity generated from onshore wind and offshore wind continues to fall.⁷

We ask that the Government ensure that renewable energy projects ensure shared financial benefits and community investment, and provide benefits for First Nations people.

Fishing - Recreational and commercial: Key benefits or opportunities related to fishing for offshore wind in this proposed area

As stated above, Vets for Climate Action recognises that the biggest threat to our much loved wildlife and oceans is climate change (caused by fossil fuels), and oil and gas projects.

While we understand there may be minimal temporary and local impacts to fish and sealife during the construction of the project, Vets for Climate Action asks the

⁵ Farr, H., Ruttenberg, B et al, (2021) [Potential environmental effects of deepwater floating offshore wind energy facilities](#)

⁶ <https://www.energy.gov.au/news-media/news/renewables-confirmed-cheapest-source-electricity>

⁷ <https://www.irena.org/news/pressreleases/2022/Jul/Renewable-Power-Remains-Cost-Competitive-amid-Fossil-Fuel-Crisis>

Government to give special attention to migration routes, breeding grounds and foraging areas of wildlife (including fish), and engage proper environmental scrutiny including environmental impact statements, and engagement with the relevant stakeholders and regulators like NOPSEMA to mitigate the impacts on fish and fishers⁸.

Visual Amenity: Concerns related to visual amenity for offshore wind in this proposed area

Vets for Climate Action does not have any concerns related to visual amenity for offshore wind projects, although recognise that this is subject to personal preferences.. The benefits of an offshore wind farm to reducing greenhouse gas emissions and the impact of climate change to Australians and our animals outweigh any perceived negative visual impacts. Wind farms located far from shore clearly provide less visual impact.

Other benefits or opportunities for offshore wind in this proposed area

Vets for Climate Action commends the Federal Government's commitment to "net zero emissions by 2050"⁹ and enshrining Australia's Paris Agreement emission reduction targets of 43% of 2005 levels by 2030, in legislation.¹⁰

In 2021, Fatih Birol, executive director of the International Energy Association and one of the world's foremost energy economists, said: "If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now – from this year".¹¹ Similarly, earlier this year the United Nations Secretary-General Antonio Guterres said that countries must start phasing out oil, coal and gas, not just emissions.¹² We consider that investing in offshore wind projects like this one in the Illawarra will assist the Federal (and NSW) Government to deliver on their emission targets by reducing the reliance on or need for gas and coal mining.

Conclusion

Vets for Climate Action is working towards a world where humans and animals thrive together in a healthy climate. Climate change is increasingly an animal health and welfare issue. Animals hold no responsibility for the causes of climate change, yet they

⁸ Virtanen, E.A., et al, (2022) [Balancing profitability of energy production, societal impacts and biodiversity in offshore wind farm design](#),

⁹ Northern Territory Government (2020), [Northern Territory Climate Change Response: Towards 2050](#), July 2020, accessed 30 October 2023,

¹⁰ The *Climate Change Act 2022* (Cth) and the *Climate Change (Consequential Amendments) Act 2022* (Cth)

¹¹ <https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist>

¹² [UN chief to fossil fuel firms: stop trying to 'knee-cap' climate progress | Reuters](#)

experience the consequences most strongly. Many animals have already been lost in Australia due to heatwaves and severe weather events caused by changing climate, and with current warnings of another El Nino system forming, we can expect many more animals to perish.

The scientific evidence is unequivocal, and it is clear we must act now to reduce emissions, and under no circumstances begin new gas or oil projects of any nature. Increasing Australia's renewable energy capabilities will work towards reducing damage to the environment, further animal extinctions and loss of biodiversity as well as reduce severe climate impacts on livestock.

Vets for Climate Action supports the offshore wind project. Our concern as veterinarians, vet nurses and animal care professionals is about the impacts and risks to all animals, including protected and threatened marine species, ecosystems and food webs if we do not take steps to reduce our reliance on oil and gas projects.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stefany Goldring', with a stylized flourish at the end.

Stefany Goldring

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APPENDIX 1

AUSTRALIAN ANIMALS SUFFER AND DIE DUE TO CLIMATE CHANGE

An Australian rodent in the Torres Strait Islands, the Bramble Cay melomys, is the first mammal to become extinct due to climate change. Rising sea levels and storm surges resulted in loss of habitat.

Coral on the Great Barrier Reef has been killed by successive mass bleaching events due to rising ocean temperatures. This brings long term risks not only to the reef itself but to the diversity of marine fauna living within the reef, including dugong and marine turtles.

Green turtles are at risk of extinction as their gender ratio becomes distorted.¹³ The sex of a sea turtle is determined by the temperature of the sand incubating the eggs. Warmer temperatures of 29.1 degrees Celsius and above produce females and cooler temperatures produce males. Global warming means more females are born, disrupting the natural gender ratio. It is possible that sea turtle hatchlings could be completely female in the near future.

Over 3 billion animals died or were displaced during the 2019-2020 bushfires:

- 143 million mammals;
- 2.46 billion reptiles;
- 180 million birds; and
- 51 million frogs.¹⁴

‘This ranks as one of the worst wildlife disasters in modern history,’ reported the WWF.

More than 23,000 spectacled flying foxes were killed¹⁵ in far north Queensland, when temperatures were over 42°C, equating to almost one in every three individual animals in the population, which is listed as endangered under the EPBC Act.

127 ringtail possums died¹⁶ after they became so dehydrated they drank sea water after 4 days of temperatures in the high 30s, in the Mornington Peninsula, Victoria in early 2019.

Floods in Far North Queensland killed over 600,000 cattle in 2019.¹⁷ Those that didn’t drown died of cold exposure in the summer month of February. The damage bill was estimated at \$2 billion.

Flooding in NSW and southern Queensland in 2022 affected an estimated 475,000 cattle

¹³ Craig Welch, [Rising Temperatures Cause Sea Turtles to turn Female](#), National Geographic, 9 Jan 2018

¹⁴ p. 2, [Interim Report: Australia’s 2019-2020 Bushfires: The Wildlife Toll](#), WWF, 28 July 2020, accessed 28 Oct 2022

¹⁵ Sharnie Kim & Adam Stephen, [Extreme heat wipes out almost one third of Australia’s spectacled flying fox population](#), ABC News, 19 Dec 2018, accessed 28 Oct 2022

¹⁶ Lisa Cox, [‘Falling out of tree’: dozens of dead possums blamed on extreme heat stress](#), The Guardian, 7 March 2019, accessed 28 Oct 2022

¹⁷ Tom Major, [Cattle, infrastructure losses following Queensland floods could near \\$2b, farm lobby says](#), ABC News, 16 April 2019, accessed 28 October 2022

(or about 2% of the national herd).¹⁸ It also impacted food and feed crops.

Severe flooding in eastern Australia in 2022 trapped and drowned wombats and echidnas (and other burrowing animals) in their burrows. An estimated 475,000 grazing animals (or about 2% of the national herd)¹⁹ were swept away or starved when dirty water contaminated their pastures. It also impacted food and feed crops. Even marine species, turtles and seabirds were displaced when floodwaters reached the ocean.

Dogs or other pets can develop severe heat stress, brain damage and die in as little as 4 to 6 minutes if left unattended in a vehicle. The risks of this are increasing with more heat waves, as is the probability of dogs burning their footpads when walking, as roads and footpaths heat up so much more than the air.

A United Nations report has determined that about one million animal and plant species are threatened with extinction, many within decades, more than ever before in human history. Biodiversity is essential for the processes that support all life on Earth, including human life. An average 69% decline in monitored wildlife populations has been recorded around the world between 1970 and 2018.²⁰

Climate change brings new disease threats

One Health is the connection between the health of the environment, people and animals. Climate change will alter disease prevalence, especially when vectors are involved. In the past two years, mosquitoes have moved south in Australia, carrying Japanese encephalitis virus, infecting piggeries and resulting in cases and deaths in humans.²¹

Fruit bats are likely to respond to climate change and extreme temperatures by migrating to more suitable areas. Hendra virus, found naturally in fruit bats, has had a huge impact in Queensland and NSW, with fatalities in horses as well as people.²² The virus responsible for the COVID-19 pandemic is thought to have originated from bats with pangolins as an intermediate host.²³

¹⁸ Natasha May, [Floods and livestock losses leave NSW and Queensland farmers reeling from third disaster in three years](#), The Guardian, 2 March 2022, accessed 28 October 2022

¹⁹ Natasha May, [Floods and livestock losses leave NSW and Queensland farmers reeling from third disaster in three years](#), The Guardian, 2 March 2022, accessed 28 October 2022

²⁰ [UN report on biodiversity loss](#)

²¹ <https://www.health.gov.au/health-alerts/japanese-encephalitis-virus-jev/japanese-encephalitis-virus-jev>

²² <https://www.cdc.gov/vhf/hendra/index.html>

²³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9408936/#:~:text=According%20to%20our%20%20current%20%20understanding,are%20still%20unaddressed%20%5B9%5D> .