recfishwest

Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Secretary,

OFFSHORE ELECTRICITY INFRASTRUCTURE (REGULATORY LEVIES) BILL 2021 AND OFFSHORE ELECTRICITY INFRASTRUCTURE BILL 2021

Thank you for the opportunity to provide comment on the Senate Environment and Communications Legislation Committee Inquiry into the Offshore Electricity Infrastructure (Regulatory Levies) Bill 2021 and Offshore Electricity Infrastructure Bill 2021.

Recfishwest is the recognised peak body for recreational fishing in Western Australia, representing an estimated 750,000 recreational fishers who contribute $2.4 billion to the economy annually. Our purpose is to ensure great fishing experiences for all in the WA community forever and we are committed to protecting, promoting, and creating sustainable, accessible, enjoyable and safe fishing for the benefit of the community.

Recfishwest recognises and supports the need for the installation of large scale offshore renewable energy infrastructure, as a means of replacing current non-renewable forms of energy production.

This submission addresses the following three themes:

1. Opportunity for offshore renewable energy infrastructure to act as habitat enhancement devices
2. Concerns over exclusion of fishers in proximity to offshore renewable energy infrastructure
3. Legacy opportunities for offshore renewable energy infrastructure

Opportunity for offshore renewable energy infrastructure to act as habitat enhancement and fishery production devices

Recfishwest believes that, if undertaken in line with fishing community values, the installation of offshore renewable energy infrastructure provides a unique opportunity to enhance recreational fishing experiences across Australia.

The deployment of artificial reefs in Australia over the last decade highlights the benefits of offshore infrastructure as a means of fish production and habitat enhancement which benefit both the marine environment and end users such as recreational and commercial fishers. When designed, constructed and installed in line with artificial reef principles, Recfishwest believe that offshore renewable energy infrastructure can play a similarly significant role in providing these environmental, social and economic benefits.

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Many recent studies of purpose-built artificial reefs have concluded that any structure that seeks to increase fishery production must be specifically designed to consider the following features:

- Maximising infrastructure surface area
- Provision of interstitial spaces
- Structure volume
- Provision of ecological niches

Recfishwest recommends that any offshore renewable energy infrastructure be designed in a manner by which the underwater component acts as a fishery production device.

Concerns over exclusion of fishers in proximity to offshore renewable energy infrastructure

Access to safe, sustainable and enjoyable fishing experiences is the highest priority of recreational fishers in Australia. The recreational fishing sector is likely to oppose the installation of any offshore infrastructure if it results in reduced access.

Recreational fishers are currently suffering from a continued loss of access to these experiences through infrastructure development, competing uses of the marine environment and the introduction of marine protected areas. Impact on access is the greatest concern recreational fishers have in relation to the development of offshore renewable energy infrastructure.

Community feedback for Australia's first offshore wind project ('Star of the South') located off the south coast of Gippsland indicated that 50% of respondents were recreational fishers, and their main concern was a loss of access to key recreational fishing experiences.

Furthermore, the social and economic benefits of offshore renewable energy infrastructure as habitat enhancement and fishery production devices can only be realised if recreational fishers maintain reasonable access to fishing experiences in deployment areas. The Block Island wind farm, offshore from Rhode Island in the United States is one such installation that has provided these benefits to recreational fishers through allowing access to the structures. This is highlighted in a study by the US Coast Guard and the University of Rhode Island in which survey data confirms that anglers, particularly those who fished at the wind farm, believe the wind farm has benefitted fishing.

Recfishwest recommends reasonable access to fishing experiences around offshore renewable energy infrastructure is legislated into the new Bill. Where it is not possible to maintain access, suitable social, environmental and economic offsets should be provided in consultation with the recreational fishing community.

Legacy opportunities for offshore renewable energy infrastructure

Recfishwest currently understand that Chapter 4, division 3 of the draft Bill speaks to the need for offshore renewable energy infrastructure to be removed from the title area at the conclusion of its service life.

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Many recent studies undertaken on oil and gas infrastructure approaching its end of life highlight the ecological benefit provided by structures such as platforms, risers, subsea manifolds and pipelines.

Given the likelihood that well-designed offshore renewable energy infrastructure will, following their service life, provide highly productive habitats that assist large scale fishery production, Recfishwest believe that once decommissioned, these installations provide greater benefit to the environment and the community by being left in-situ.

One such example of the benefits of leaving offshore infrastructure in-situ (or indeed deploying it at a different location as an artificial reef) is the Gulf of Mexico in the southern United States, where over 500 artificial reef structures have been created from decommissioned oil and gas infrastructure.

Recfishwest recommends that alternative decommissioning options be considered for offshore renewable energy infrastructure that provides greater social, environmental and economic benefits to both the community and the operator. To maintain a decades old philosophy around total removal of infrastructure will; deter investment in offshore infrastructure, be environmentally irresponsible and result in significant social opposition. Recfishwest recommended the legislated approach to end-of-life infrastructure should be to act in the best interests of the environment with retaining structures proving to provide an environmental benefit the preferred approach.

Thank you again for the opportunity to provide comment on the draft Bill. Should you require further information, please do not hesitate to call our office on [redacted].

Yours Sincerely

[redacted]

Dr Andrew Rowland
Chief Executive Officer

15 September 2021

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