Thursday, 9 April 2026

Renewables Regulatory Practice Section
Environment Regulation Division
Department of Climate Change, Energy, the Environment and Water
John Gorton Building, King Edward Terrace
Parkes ACT 2600, Australia.

Dear Renewables Regulatory Practice Section

Re: CEC submission regarding consultation on the draft Australian Collision Risk Framework for onshore and offshore wind farms

The Clean Energy Council (***CEC***) welcomes the opportunity to provide a submission to the Department of Climate Change, Energy, the Environment and Water (***DCCEEW***) on the *draft Australian Collision Risk Framework for onshore and offshore wind farms* (***ACRF***).

The CEC is the peak body for the clean energy industry in Australia. The CEC supports the intent of the ACRF to provide guidance and a standardised approach to estimating the likelihood of bird and bat collisions with wind turbines. In particular, the CEC welcomes increased certainty and a consistent approach to undertaking bird and bat assessments for species listed under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (***EPBC Act***).

The CEC's comments focus on ensuring that the ACRF does not result in overly conservative outcomes and is applied proportionately (to avoid unnecessarily costly and complex assessments for low-risk sites). In addition, further work is required to ensure that proponents are clear on how the ACRF is integrated into the EPBC Act approval process and that attempts to standardise assessments do not override site-specific nuance.

The following defined terms are used in this submission:

- (***Catalogue of Measures****)* means the *draft catalogue of measures to avoid and mitigate collisions of birds and bats with wind farms.*
- (***Collision Risk Model (CRM)***) means the application enabling a quantitative collision risk model, which estimates potential bird collisions using data inputs.
- (***Collision Likelihood Score (CLS)***) means the application for conducting qualitative collision likelihood assessments based on standardised criteria.
- (***Offshore Survey Guide***) means the guide summarising best practice for data collection in relation to offshore wind farms.
- (***Onshore Survey Guide***) means the guide summarising best practice for data collection in relation to onshore wind farms.
- (***Overview and User Guide***) means the ACRF overview and user guide dated 2 March 2026.

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- (***Species Trait Tool***) means the tool, which provides data for an initial collision assessment in a standard format.

1. Biodiversity context

1. The ACRF should be grounded in the broader biodiversity context. Many species of concern have experienced significant population declines in recent years due to multiple, well-established pressures, with collision risk from wind energy infrastructure generally representing a comparatively minor contributor. Key drivers of decline include habitat loss and fragmentation, predation by invasive species, bushfires, and heat stress associated with increasingly severe weather events linked to climate change.[1]
2. The ACRF should ensure that CRM and CLS processes are proportionate to the relative contribution of collision risk, rather than treating turbine collision risk in isolation or as a primary threat in all cases. It is also important to recognise the broader environmental benefits of renewable energy projects, including their critical role in reducing greenhouse gas emissions and mitigating climate change, which is one of the most significant threats to biodiversity.

2. Premature focus on quantitative assessments

3. The ACRF emphasises quantitative assessments for estimating the range of expected collisions for both onshore and offshore wind farms. A focus on quantitative modelling may be premature in many cases, given limitations in data availability and quality, such as uncertain population sizes or poor baseline information. For example, the ACRF's reliance on desktop data in the planning stages may be problematic for offshore wind, given the well-recognised data gaps for seabird species. This lack of data creates a risk that site identification is based on incomplete or uncertain information and may make it difficult for proponents to document how site placement contributes to avoidance of specific collision risk criteria.
4. The ACRF should explicitly support a proportionate approach, whereby low-risk projects can rely primarily on qualitative assessments, while higher-risk projects justify the use of full quantitative analyses. Further guidance is needed to ensure that project approvals do not require quantitative assessments where they are not feasible or warranted.

[1] The 2021 State of the Environment Report states '[t]he 2 pressures that have caused the most extinction of Australian terrestrial species since the beginning of colonisation are introduced species (causing the loss of 64 species), and habitat loss and clearing (62 species). In an analysis of all nationally listed threatened terrestrial and aquatic plants and animals in Australia as of July 2018, the same 2 threats were most frequently listed: habitat loss, fragmentation and degradation (1,210 taxa); and invasive species and disease (966 taxa) (Ward et al. 2021). In more recent times, known extinctions have been associated with introduced disease, sea level rise, and introduced reptiles and fish (Woinarski et al. 2019).' In addition, this report notes the following regarding climate change: 'Changes in climate that have been recorded across the Australian landmass are associated with a range of biodiversity responses, including decreases in some species and increases in others. Alpine ecosystems and biodiversity in Australia are particularly vulnerable to climate change that affects snow depth, and the spatial and temporal extent of snow, which have all declined since the late 1950s'.

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5. The ACRF should explicitly caution against over-reliance on model outputs where key parameters are uncertain. Collision risk models can generate precise numerical outputs; however, where inputs such as avoidance rates or flight height distributions are poorly constrained, those results may give a false impression of accuracy.

Recommendation 1: include clearer recognition in the ACRF that quantitative models may not be available due to data constraints. Incorporate a proportionality assessment so that where the initial assessment is lower risk there is also less requirement for a quantitative assessment. Include guidance that collision risk outputs must be interpreted in the context of any data limitations.

3. Integration with approval process and proportionality

6. There remains a lack of clarity regarding how the draft ACRF will be integrated into the EPBC Act approval process. The CEC makes the following recommendations:

   a. Guidance regarding use of the ACRF in EPBC Act assessments

   The CEC supports the position in the Overview and User Guide that the ACRF provides guidance rather than mandatory requirements, allowing proponents to adopt alternative approaches where justified by new scientific information or emerging best practice, provided these decisions are well-documented.[2] That said, we recommend that further guidance be provided in relation to how decision makers will use the ACRF and what information should be provided if a proponent intends to depart from the ACRF. This will avoid a scenario where non-mandatory guidance is, in effect, treated as a mandatory requirement.

   b. Guidance regarding use of the ACRF in state and territory assessments

   While the ACRF is focused on protected matters under the EPBC Act, it is also 'designed to be applicable in a more general environmental impact assessment context'.[3] The CEC recommends clarification regarding the applicability of the ACRF in broader environmental impact assessments, including to avoid duplication between state and federal assessments, and to avoid an overly cautious approach being applied.

   c. Link Species Trait Tool risk level to the degree of assessment

   The Species Trait Tool should be more closely linked to risk-based assessment outcomes, so that lower-risk species trigger less intensive assessments and higher-risk species require more detailed evaluation. While the Onshore and Offshore Survey Guides acknowledge the need for survey methods to match the scale, complexity, and risk profile of a project, a clearer proportionality framework would strengthen consistency in application.

[2] Overview and User Guide, page 1.
[3] Overview and User Guide, page 1.

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d. Model conditions for CRM and CLS

Integration of the ACRF into the EPBC Act approval process would be enhanced by standardised model conditions, including template conditions for CRM and CLS, as well as monitoring and reporting requirements. Such an approach would provide greater certainty to proponents and ensure that assessments are proportionate, transparent, and enforceable.

Any model conditions should be developed in consultation with industry and should be prepared in a consultative and iterative manner. They should be applied as guidance rather than prescriptive requirements, with proponents able to propose alternative, fit-for-purpose conditions where appropriate.

Recommendation 2: Clarify how the ACRF will be applied in EPBC Act assessments, as well as state and territory assessments.

Recommendation 3: Develop a risk matrix to assist with assessment outcomes, the risk matrix should be informed by the assessment in the Species Trait Tool (among other things).

Recommendation 4: Establish model conditions for CRM and CLS in consultation with industry.

4. Integration of management and mitigation strategies

7. Clarification is needed on how the ACRF interacts with the Catalogue of Measures, particularly regarding the timing and selection of mitigation options. Guidance should specify at which stages of project planning and assessment different mitigation measures should be considered, ensuring they are evaluated early enough to inform site design, operational planning, and approval conditions. This would support a structured, risk-based approach where mitigation is integrated proportionately. Mitigation options should be prioritised based on ecological risk, feasibility, and potential impact reduction, rather than assessed in isolation or too late in the project development process.

Recommendation 5: Provide guidance on the interaction between the ACRF and the Catalogue of Measures.

5. Documenting data gaps

8. The CEC emphasises the importance of clearly documenting data gaps within the ACRF and ensuring that site-specific ecological nuance is appropriately recognised in assessment outcomes. In many cases, limitations in baseline data, uncertainty in population estimates, or incomplete understanding of species behaviour may result in conservative assumptions being applied.
9. While a precautionary approach is appropriate, these uncertainties should be transparently articulated, with guidance on how they should be interpreted by decision-makers. Explicit recognition of data gaps would assist regulators in understanding the level of confidence in

assessment outputs and support the use of adaptive management approaches, rather than default escalation to higher-order assessment or mitigation requirements.

10. In addressing acknowledged data gaps, the ACRF should include explicit guidance to prevent 'precaution creep', whereby uncertainty is effectively conflated with demonstrable risk. In such cases, uncertainty can lead to the adoption of increasingly conservative assumptions, which in turn drive progressively more onerous mitigation measures and survey requirements.
11. Consideration should be given to variations in data availability between onshore and offshore wind technologies in the Australian context, and the potential need to adapt how the ACRF is applied accordingly. This is particularly relevant for offshore wind, where feasibility studies are underway and may help address existing data gaps for certain species.

Recommendation 6: Explicitly articulate data gaps within the ACRF and provide guidance on how they should be considered in decision-making.

Recommendation 7: Include explicit guidance to avoid 'precaution creep' as a result of known data gaps.

Recommendation 8: Explicitly address data variances between onshore and offshore wind and consequential constraints for offshore wind farm assessments.

6. Survey sufficiency and proportionality

12. The ACRF should define in the Onshore Survey Guide and Offshore Survey Guide clear 'survey sufficiency' criteria to identify when further survey effort is unlikely to reduce uncertainty or change the assessment outcome. Without this guidance, there is a risk of ongoing, iterative survey requirements without corresponding gains in decision quality. This risk is particularly pronounced for rare or cryptic bird and bat species.
13. The ACRF should also recognise that diminishing returns are inherent in ecological surveys. Very low detection rates, especially following substantial and appropriately designed effort, may represent a valid ecological outcome rather than a data gap. For example, for species such as the Southern Bent-Wing Bat, low activity levels can be an indicator of low collision risk and should not automatically trigger additional survey requirements or more conservative assessment pathways.
14. Certain survey techniques referenced in the Offshore Survey Guide (such as floating acoustic monitoring[4] for birds and bats) are not currently feasible for offshore wind feasibility studies. Limitations include restricted detection ranges, immature technologies, and significant logistical constraints in offshore deployment, maintenance, and data retrieval. Notably, there are no established or accepted methodologies for robust baseline bat surveys offshore in Australia. Without clear qualification, inclusion of these methods risks creating unrealistic expectations among regulators and stakeholders, complicating compliance and affecting project delivery. The

[4] Offshore Survey Guide, page 5.

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ACRF should explicitly acknowledge these limitations and avoid implying that such data can be reliably obtained at this stage.

Recommendation 9: include defined 'survey sufficiency' criteria in the Onshore Survey Guide and Offshore Survey Guide, this should also recognise that where certain survey thresholds have been met a low detection rate is a valid outcome.

Recommendation 10: undertake further consultation with industry to ensure that the survey techniques for offshore wind are feasible.

The CEC welcomes further engagement with DCCEEW in relation to the ACRF. If you have any queries or would like to discuss this submission in more detail please contact me on erutherfurd@cleanenergycouncil.org.au.

Kind regards

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