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Phase 1 - Independent Review of the Coastal Trading Act 2012

**By Email:** [Lodged via the online portal](#)

1 November 2024

**Response to: Consultation for Phase 1: Independent Review of the Coastal Trading  
(Revitalising Australian Shipping) Act 2012**

Thank you for the opportunity to provide feedback on the Independent Review of the Coastal Trading (Revitalising Australian Shipping) Act 2012 (the Act).

RWE Offshore Wind GmbH is part of the RWE Group and a global energy company for sustainable electricity generation based on offshore wind power. RWE is one of the world's leading producers of renewable energy and operates a global portfolio of around 17 gigawatts (GW) of renewable wind, solar and battery storage projects.

In Australia, Kent Offshore Wind Pty Ltd, a wholly owned subsidiary of RWE Offshore Wind GmbH, has recently been awarded a Feasibility Licence from the Australian Government to undertake detailed environmental assessments and marine surveys, and prepare a Management Plan for the Project.

Relevant to the Review's considerations, offshore wind projects rely on a range of vessels across all project stages, including survey work, major component transfer, crew transfer, turbine installation and then throughout the longer term operations and maintenance phase. The number and category of vessels including the length of time required to complete an activity, depends on a range of factors including, environmental conditions, water depth, turbine type and project size.

The success of project development for an offshore wind farm is tied closely, amongst other matters, to access and availability of suitable vessels and legislative framework which provides certainty. Given the nascent nature of the offshore wind industry in Australia, the effect of the Act to the offshore wind industry is yet to be fully tested (albeit

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for a few smaller environmental survey campaigns which have been relatively short in duration).

RWE is a member of the Clean Energy Council (CEC) who have also provided a submission to the Review.

We support the CEC submission, in particular, the following matters summarised below for the Reviews further deliberation:

1. Potential risk that offshore wind activities during the construction and operational phase of project delivery may be considered 'coastal trading' and are concerned by the unintended consequences due to the lack of availability of Australian flagged vessels and crew.
2. Consideration for exemption of the offshore wind industry under the Act. This could be either creating a new exemption for offshore wind energy to capture offshore vessels used to deliver electricity generation or expansion to the current exemption for '*offshore industry vessel*' in the Act .
3. Welcome the opportunity to engage with the Review and Department to consider how the Act can create pathways for increasing the number of Australia seafarers and shore workers.
4. Encourage consideration through the Review and Department for how the Strategic Fleet could support the offshore wind industry.

Finally, we would welcome the opportunity to actively engage with the Review and Department, discuss our interest and experience from other markets to consider how the proposed reforms can support and not unintentionally restrict or create unintended consequences for the development of Project Kent.

We look forward to your reply and becoming further involved in this Review.

If you have any further questions in relation to the information provided, please contact me on [REDACTED]

Yours sincerely,

