Planning Panels Victoria

Star of the South Offshore Wind Farm Project Environment Effects Statement

Inquiry Report

Environment Effects Act 1978

8 October 2026

VICTORIA State Government

Planning Panels Victoria acknowledges the Wurundjeri Woi Wurrung People as the traditional custodians of the land on which our office is located. We pay our respects to their Elders past and present.

Environment Effects Act 1978 - Inquiry report under section 9(1)

Star of the South Offshore Wind Farm Project Environment Effects Statement

8 October 2026



Lisa Kendal, Chair



Elizabeth McIntosh, Deputy Chair



John Hartigan, Member



Colin McIntosh, Member



Cameron Miller, Member

Document version control

Version	Date	Updates
1	8 October 2026	N/A
2	21 October 2026	• Minor typographical and formatting corrections • Edits to the list of changes to Project documentation in the Executive Summary • Edits to wording of overarching recommendations in Executive Summary and Table 5 • Addition of explanatory text to Inquiry Assessment in Chapter 11.4 • Removal of new mitigation measure from Appendix H (Inquiry recommended Environmental Management Framework) that was included in error

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Glossary and abbreviations

alignment options	feasible options (AB, C and D) to connect to the proposed VicGrid connection hub (see Figure 2)
Assessor's Handbook	*Assessor's Handbook – Applications to remove, destroy or lop native vegetation* (DEECA 2025, Version 1.2)
Biodiversity 2037	*Protecting Victoria's Environment – Biodiversity 2037*
bird flu	H5N1 avian influenza
BLCAC	Bunurong Land Council Aboriginal Corporation
CEMP	Construction Environmental Management Plan
CFA	Country Fire Authority
CHMP	Cultural Heritage Management Plan
CNMP	Construction Noise Management Plan

common alignment	Onshore works project area extending from the shore crossing at Reeves Beach to Giffard (see Figure 2)
Commonwealth waters	Marine waters beyond 3 nautical miles offshore, within Commonwealth jurisdiction
Commonwealth works	Project works located in Commonwealth waters
Community Benefit Guidelines	*Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria* (DELWP, July 2021)
CVA	Cultural Values Assessment
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEECA	Department of Energy, Environment and Climate Action
DELWP	Department of Environment, Land, Water and Planning (former)
DTP	Department of Transport and Planning
EE Act	*Environment Effects Act 1978*
EES	Environment Effects Statement
EMF	Environmental Management Framework
Environmental Line List	A list that identifies and documents ecological values at relevant chainages across the onshore Project area that will guide contractors in the development of specific management requirements for these values
EP Act	*Environment Protection Act 2017*
EP Regulations	*Environment Protection Regulations 2021*
EPA	Environment Protection Authority Victoria
EPA Victoria Publication 1834.2	EPA Victoria Publication 1834.2: *Civil construction, building and demolition guide*
EVC	Ecological Vegetation Class
FFG Act	*Flora and Fauna Guarantee Act 1988*
final alignment	alignment of the Victorian works selected through detailed design and identified in the endorsed Alignment Plan
GDEs	groundwater dependent ecosystems
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
HDD	Horizontal Directional Drilling
MDS	Maximum Design Scenario
Minister	Minister for Planning
MNES	matters of national environmental significance
MPA	Marine protected areas
MRSD Act	*Mineral Resources (Sustainable Development) Act 1990*
Native Vegetation Guidelines	*Guidelines for the removal, destruction or lopping of native vegetation* (DEECA, 2025)

Noise Protocol	EPA Publication 1826.5, Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises, and entertainment venues
OEMP	Operational Environmental Management Plan
Overall Project	Star of the South Offshore Wind Farm
PE Act	*Planning and Environment Act 1987*
Planning Scheme	Wellington Planning Scheme
PMPs	Property Management Plans
PPV	Planning Panels Victoria
Project	Victorian works
Project area	Includes land used for the following components (as shown Figure 2): Offshore export cable land, Onshore project area – common alignment, Onshore project area –alignment options to VicGrid hub.
Proponent	Star of the South Wind Farm Pty Ltd as trustee for the Star of the South Trust
PSA	Planning scheme amendment
RAP	Registered Aboriginal Party
Responsible Future	Responsible Future (Illawarra Chapter) Inc.
REZ	Renewable Energy Zone
SCO	Specific Controls Overlay
SCO3	Specific Controls Overlay Schedule 3
Scoping Requirements	Scoping Requirements for Star of the South Offshore Wind Farm Environment Effects Statement (DELWP, August 2021)
SIV	Seafood Industry Victoria Inc.
South Gippsland Council	South Gippsland Shire Council
Submitter Conference	Meetings held by the Inquiry to explore the Key Victorian Matters through submissions and discussions with the Proponent, Parties and experts, guided by the Terms of Reference and *Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978*
VCAT	Victorian Civil and Administrative Tribunal
VicGrid connection hub	planned connection hub in Giffard being developed by Victoria's transmission network planner, VicGrid
VicGrid Project	Gippsland offshore wind 2GW transmission project
Victorian waters	Waters within the Victorian jurisdiction, extending to 3 nautical miles offshore

Victorian works	Project works located in Victorian waters and land, as described in EES Chapter 4 (Victorian works project description) and Chapter 1.2 of this report
VQA Assessment Manual	*Native Vegetation: sustaining a living landscape, Vegetation Quality Assessment Manual – guidelines for applying the Habitat Hectare scoring method* (Version 1.3)
WAS	Workforce Accommodation Strategy
Water Act	*Water Act 1989*
Wellington Council	Wellington Shire Council
WGCMA	West Gippsland Catchment Management Authority
Written submissions process	A process for the Inquiry to consider the Other Victorian Matters through further written submissions from the Proponent and Parties, guided by the Terms of Reference and *Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978*

Overview

Project summary	
Overall Project	Star of the South Offshore Wind Farm Project
Overall Project location	Offshore in the Commonwealth and Victorian waters off the Gippsland coast, and onshore between Reeves Beach and Giffard
Victorian works	The Victorian works (subject of the Environment Effects Statement) are located in Victorian waters and land, including: - offshore transmission infrastructure - up to 8 underground cables in Victorian waters - shore crossing infrastructure – up to 8 trenchless crossings (bored cables) under Reeves Beach - onshore transmission infrastructure - 30 kilometres of underground tranmission cable connecting to the proposed VicGrid connection hub
Victorian works location	Offshore in Victorian waters to the extent of 3 nautical miles (5.5 kilometres) off the Gippsland coast, and onshore between Reeves Beach and Giffard, Gippsland, Victoria
Proponent	Star of the South Wind Farm Pty Ltd as trustee for the Star of the South Trust
Exhibition	18 May to 29 June 2026 (30 business days)
Number of submissions	51 (see Appendix E)

Inquiry	
Inquiry members	Lisa Kendal, Chair Elizabeth McIntosh, Deputy Chair John Hartigan, Member Colin McIntosh, Member Cameron Miller, Member
Inquiry role	The Minister for Planning appointed the Inquiry under section 9(1) of the *Environment Effects Act 1978* on 14 May 2026 to inquire into the environmental effects of the Project's Victorian works on the Victorian environment
Supported by	Gabrielle Trouse, Project Officer, Planning Panels Victoria Amy Selvaraj, Manager Major Projects, Planning Panels Victoria
Directions Hearing	Planning Panels Victoria and online, 14 July 2026
Inquiry Submitter Conference and Written Process	Submitter Conference over four days in person and online: - 10 August 2026 at Wellington Shire Council Chambers, Sale - 12 and 19 August 2026 at Planning Panels Victoria, Melbourne - 13 August 2026 at Cliftons Conference Centre, Melbourne

	Written process: - 6 August 2026: Opportunity for Parties to make further written submissions on Other Victorian Matters - 28 August 2026: Opportunity for Proponent to make written closing submissions on Other Victorian Matters
Site inspections	Accompanied, 11 August 2026 (participants included members of the Inquiry and representatives of the Proponent, no submitter wished to attend)
Parties to the Inquiry process	See Appendix F
Citation	Star of the South Offshore Wind Farm Project (EES) [2026] PPV
Date of this report	8 October 2026

Executive summary

(i) The Project

The Star of the South Project (Overall Project) is a proposed offshore wind energy project comprising up to:

- 147 wind turbines located 10 to 40 kilometres from shore
- 5 offshore substations
- 8 offshore export cables
- 8 trenchless shore crossings at Reeves Beach
- 30 kilometres of underground transmission cable system on land.

Star of the South Wind Farm Pty Ltd as trustee for the Star of the South Trust is the Proponent for the Overall Project.

The Victorian works (the Project) are located on the lands and waters of the Gunaikurnai people. The Victorian works are proposed to occur offshore in Victorian waters and onshore on land between Reeves Beach and Giffard in Gippsland within the Wellington Shire Council municipality. The works consist of cables located in Victorian waters (up to around 5.5 kilometres offshore) and on land between Reeves Beach and Giffard.

(i) Context for assessment and approvals

The Overall Project is subject to separate Commonwealth and Victorian environmental assessment processes because it extends across Commonwealth and Victorian jurisdictions. It is also a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) and is being assessed through an Environmental Impact Statement (EIS).

On 11 May 2020, the Minister for Planning determined an Environment Effects Statement (EES) was required for the Victorian works under the *Environment Effects Act 1978*. The Minister for Planning issued scoping requirements for the EES in August 2021.

The EES includes a summary report, 27 main report chapters and 26 technical reports, Environmental Management Framework (EMF) and the draft Wellington Planning Scheme Amendment C129well (draft PSA). The technical reports were prepared to inform both the Commonwealth EIS and Victorian EES assessment processes, and the EES chapters present the assessment relevant to the Victorian works.

The Project will require the primary approvals under the following legislation:

- Planning and Environment Act 1987
- Marine and Coastal Act 2018
- Aboriginal Heritage Act 2006.

Various secondary approvals will be required, including under the *Flora and Fauna Guarantee Act 1988* (FFG Act).

(ii) The Victorian Inquiry

On 14 May 2026, the Minister for Planning appointed the Star of the South Victorian Inquiry (Inquiry) to inquire into and report on the environmental effects of the Project on the Victorian environment in accordance with its Terms of Reference.

The Inquiry is not tasked with recommending whether the Victorian works should be approved. It is required to:

- consider and report on the potential environmental effects of the Victorian works, their significance and acceptability
- limit the scope of its proceedings to the Key Victorian Matters and Other Victorian Matters.

Impacts of the Victorian works on Matters of National Environmental Significance (as defined under the EPBC Act) are being assessed through the separate Commonwealth EIS process and are outside the scope of the Inquiry.

The EES was exhibited from 18 May 2026 to 29 June 2026 and a total of 51 submissions were received.

The Inquiry considered Key Victorian Matters using a submitter conference and Other Victorian Matters by written submissions. The Inquiry considered the exhibited EES, written submissions received in response to the exhibited material, evidence, submissions and other material provided to the Inquiry during its processes.

(iii) Assessment and overall findings

For each referred matter, the Inquiry has considered the significance of effects, the effectiveness of mitigation measures, and whether the proposed approval and implementation framework provides sufficient certainty that acceptable environmental outcomes can be achieved.

Following its assessment, the Inquiry has found that the Project's environmental effects are not expected to be significant and the Inquiry is satisfied the Project has been designed to avoid, minimise and, where needed, mitigate potential environmental effects for each referred matter.

The Project's environmental effects can be acceptably managed through the Inquiry's recommended EMF and the draft Incorporated Document (see Appendices H and I of this Report) (Project documentation). The Inquiry has based its recommendations on the Proponent's Final Day version of Project documentation.

Changes to the Project documentation are recommended in relation to:

Other Victorian Matters

- business and tourism
  - local businesses
  - commercial and recreational fisheries
- social
  - workforce accommodation
  - Reeves Beach campground

  - community benefits
- traffic and road management
- land use impacts
  - VicGrid connection hub
  - landowner impacts.

The Inquiry has also recommended to remove the Specific Controls Overlay Schedule 3 from the VicGrid connection hub land as this land was not assessed through the EES.

(iv) Specific findings and recommendations

Cumulative effects

The Inquiry's Terms of Reference require it to consider cumulative effects arising from the Victorian works together with other projects anticipated in Victoria.

Each technical report applied a four-stage cumulative assessment process to the Overall Project which involved identifying potentially relevant projects, shortlisting them, gathering available information and assessing cumulative effects. The projects were assigned a level of certainty according to their status and the information available. What was considered a 'relevant project' for the purpose of assessing cumulative impacts varied according to the particular topic.

The approach to assessing cumulative effects is reasonable and cumulative effects are acceptable, subject to the Inquiry's recommendations relating to the workforce development strategy.

Key Victorian Matters

Onshore ecology

The impacts on onshore ecology have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual impacts on:

- native vegetation are acceptable and unavoidable losses will be appropriately offset
- threatened flora and fauna species are acceptable and can be appropriately avoided, minimised and managed
- the koala are acceptable and can be appropriately avoided, minimised and managed
- habitat loss and degradation are acceptable and can be appropriately avoided, minimised and managed with regard to habitat fragmentation, habitat connectivity, aquatic and riparian habitats, groundwater dependent ecosystems and hollow-bearing trees.

The EMF is appropriate subject to including:

- a non-binding requirement for native vegetation offsets to be sourced from within Wellington Shire Council local government area
- appropriate compensatory measures for the direct loss of Pale Swamp Everlasting and Coastal Grey-box
- identification of zones to reduce speed limits in areas of extensive koala habitat

- refinement of the artificial hollow program.

Victorian marine environment and marine protected areas

The impacts on the Victorian marine environment and marine protected areas (MPAs) have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual impacts:

- to benthic ecology are acceptable
- to MPAs are acceptable
- resulting from underwater noise, vessel movement, marine biosecurity and oil spill are acceptable.

The EMF is appropriate subject to requiring the Spill Response Plan be prepared in consultation with the Department of Transport and Planning.

Coastal processes

The impacts on coastal processes have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds the residual impacts on coastal processes, including hydrodynamics and sediment transport, are acceptable and can be appropriately minimised and managed.

The EMF is appropriate subject to including a mitigation measure requiring monitoring coastal changes for the life of the Project (unless an equivalent mitigation measure is included in the Commonwealth EMF).

Aboriginal cultural heritage

The impacts on Aboriginal cultural heritage have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual impacts relating to:

- Traditional Owner engagement will be acceptable with the requirement for a Traditional Owner Engagement Plan
- cultural values including culturally significant species can be adequately considered through Cultural Values Assessments.

The EMF is appropriate subject to:

- requiring the Traditional Owner Engagement Plan apply through all stages of the Project including pre-construction and decommissioning
- requiring a Cultural Values Assessment be prepared in conjunction with Bunurong Land Council Aboriginal Corporation (the adjacent Registered Aboriginal Party) as relevant to the Project, in addition to Gunaikurnai Land and Waters Aboriginal Corporation (the Registered Aboriginal Party for the Project area).

Construction impacts (onshore noise and vibration, soil and waste)

The construction impacts (onshore noise and vibration, soil and waste) have been appropriately assessed and the environmental effects (including residual impacts) are acceptable, subject to the Inquiry's recommendations.

The EMF is appropriate subject to:

- requiring an environmental auditor with skills and expertise in acoustics to review and verify all planned and unplanned night work in accordance with relevant guidelines
- requiring the Acid Sulfate Soil Management Plan be reviewed and approved by an environmental auditor.

Other Victorian Matters

Business and tourism

The impacts on business and tourism have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual impacts to:

- local business and the local labour workforce can be appropriately managed
- agriculture and forestry businesses can be managed primarily through property-specific management plans
- commercial and recreational fisheries can be managed through compensation measures and the coexistence approach.

The EMF is appropriate subject to:

- requiring the Workforce Development Strategy minimise local labour workforce competition and consider cumulative impacts on the labour workforce market
- requiring the Fisheries Liaison and Coexistence Plan specify implementation and operational measures.

Groundwater and surface water

The impacts on groundwater and surface water have been appropriately assessed and the effects (including residual impacts) are acceptable, subject to the Inquiry's recommendations.

The EMF is appropriate.

Social

The social impacts of workforce demand have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual impacts:

- resulting from construction workforce demand on local accommodation can be managed through the Workforce Accommodation Strategy
- on local workforce participation and procurement is acceptable
- on community services are acceptable
- on Reeves Beach campground users can be appropriately managed through additional communication measures

- the proposed Community Benefit Fund is an appropriate tool to provide benefits to local communities affected by the Victorian works.

The EMF is appropriate subject to:

- requiring the Workforce Accommodation Strategy address ongoing monitoring and responsive management in relation to cumulative impacts
- including parameters around the communication measures for notifying Reeves Beach campground users of impacts
- requiring a co-designed governance, administration and approval process for the Community Benefit Fund involving the local community and Councils.

Traffic and transport

The impacts on traffic and transport have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds residual and cumulative impacts relating to the Traffic Management Plan and consultation with road authorities will be adequately managed.

The EMF is appropriate subject requiring the Traffic Management Plan be prepared pre-construction.

Land use impacts

The land use impacts have been appropriately assessed and the effects are acceptable, subject to the Inquiry's recommendations.

In relation to specific matters the Inquiry finds:

- the Specific Controls Overlay 3 should not be applied to the VicGrid connection hub land until further assessment work is undertaken to assess environmental impacts
- the Specific Controls Overlay Schedule 3 should cease to apply to land that is not included in the endorsed Alignment Plan
- the operational phase impacts from easement restrictions are acceptable
- cumulative impacts are acceptable.

The EMF is appropriate.

The draft Incorporated Document is appropriate subject to:

- removing references to works and approvals in the VicGrid connection hub land
- requiring affected landowners be consulted on changes to the Alignment Plan
- requiring a new expiry clause for land not included in the endorsed Alignment Plan.

The draft PSA maps should be amended to delete the Specific Controls Overlay Schedule 3 from the VicGrid connection hub land.

Clause 43 matters

The Inquiry's Terms of Reference require it to simply record matters it determines have minor or negligible impacts and can be readily addressed through standard and proven environmental management techniques. The following matters are addressed under this clause:

- common fauna (except koala)
- downstream effects on the Corner Inlet Ramsar Site
- marine electromagnetic field
- groundwater
- surface water.

Recommendations

If the Project proceeds, the Inquiry recommends:

Amend the Environmental Management Framework as shown at Appendix H of this Report, subject to reviewing for consistency and to address any consequential changes resulting from other recommendations in this Report.

Amend the draft Incorporated Document as shown at Appendix I of this Report, subject to addressing any consequential changes resulting from other recommendations in this Report.

Amend the draft Wellington Planning Scheme Amendment C129well maps to remove the VicGrid connection hub land.

PART A: INTRODUCTION AND BACKGROUND

1 Overall Project and Victorian works

This Chapter provides a high-level overview of the Star of the South Offshore Wind Farm Project (Overall Project) and Victorian works (the Project) relevant to the Star of the South Victorian Inquiry (Inquiry).

The Environment Effects Statement (EES) Chapters 1 to 4 provide a more comprehensive summary.

1.1 Overall Project

The Overall Project is a proposed offshore wind energy facility that will generate up to 2.2 gigawatts of electricity (enough to meet around 20 percent of Victoria's electricity demand and power around 1.2 million homes). It comprises the wind turbines and transmission connection to a planned connection hub in Giffard being developed by Victoria's transmission network planner, VicGrid (VicGrid connection hub). The Overall Project includes works located in Commonwealth waters, Victorian waters and on Victorian land.

Key Overall Project elements include up to:

- 147 wind turbines (with a maximum turbine tip height of 350 metres, located 10 to 40 kilometres from shore)
- 5 offshore substations
- 8 offshore export cables
- 8 trenchless shore crossings at Reeves Beach
- 30 kilometres of underground transmission cable system on land.

EES Chapter 2 (Project rationale) describes the anticipated Project benefits including:

- generating reliable renewable electricity on a large scale
- providing energy security as coal-fired power plants are retired
- reducing Victoria's greenhouse gas emissions and contributing to net-zero targets
- creating jobs and economic growth, particularly in Gippsland
- establishing a new offshore wind industry for Victoria, including creating supply chains and attracting investment.

Star of the South Wind Farm Pty Ltd as trustee for the Star of the South Trust is the Proponent for the Overall Project.

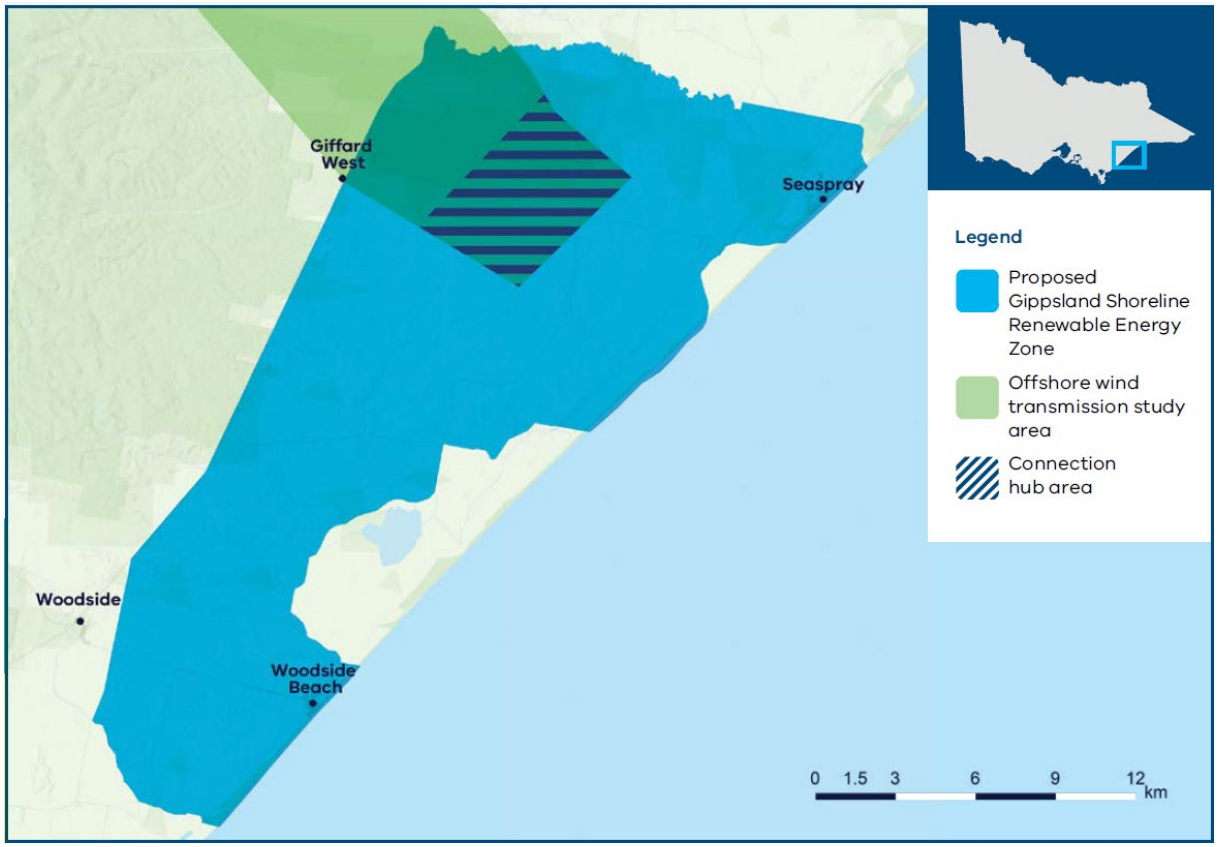
1.2 The Project

(i) Location and overview

The Victorian works (the Project) is the subject of the EES. The terms 'Victorian works' and 'the Project' are used interchangeably in this Report.

The Project is located on the lands and waters of the Gunaikurnai people, in the declared Gippsland Shoreline Renewable Energy Zone (REZ) (see Figure 1).

Figure 1 Gippsland Shoreline Renewable Energy Zone



Source: 2025 Victorian Transmission Plan

It is located offshore in Victorian waters and onshore on land between Reeves Beach and Giffard in Gippsland, Victoria (see Figure 2 and Figure 3) within the Wellington Shire Council (Wellington Council) municipality.

The Project area (as assessed in the EES) includes the land required for the following Project components shown on Figure 2: 'Offshore export cable land', 'Onshore project area – common alignment', 'Onshore project area – alignment options to VicGrid hub'. The Project area does not include the 'proposed VicGrid connection hub' or the 'Commonwealth marine area' (which are also shown on Figure 2).

The Victorian works predominantly comprise a transmission corridor that traverses an offshore area, the shore at Reeves Beach and an onshore area connecting to the VicGrid connection hub.

The Victorian works are described in EES Chapter 4 (Victorian works project description) and include (see Figure 4):

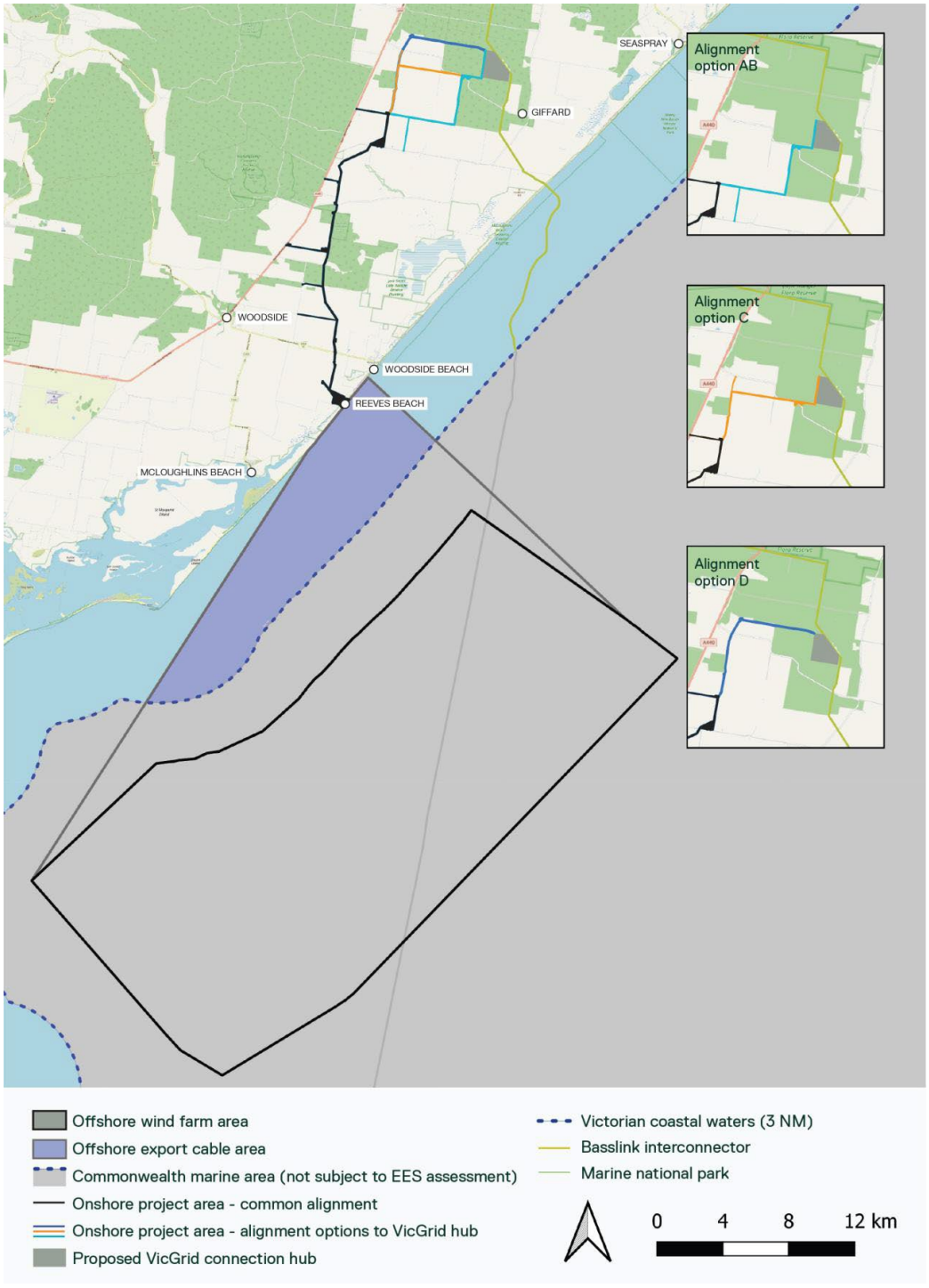
- offshore transmission infrastructure, including up to 8 underground cables in Victorian waters, shore crossing duct entry points and export cables
- shore crossing infrastructure, including up to 8 trenchless crossings (bored cables) under Reeves Beach
- onshore transmission infrastructure, including 30 kilometres of underground tranmission cable connecting to the proposed VicGrid connection hub.

The onshore works project area consists of a common alignment area (extending from the shore crossing at Reeves Beach to Giffard) (common alignment) and alignment

options AB, C and D (feasible options to connect to the proposed VicGrid connection hub) (alignment options) (see Figure 2 and Figure 3). The final alignment will includes the common alignment and preferred alignment option selected through detailed design and identified in the endorsed Alignment Plan (final alignment).

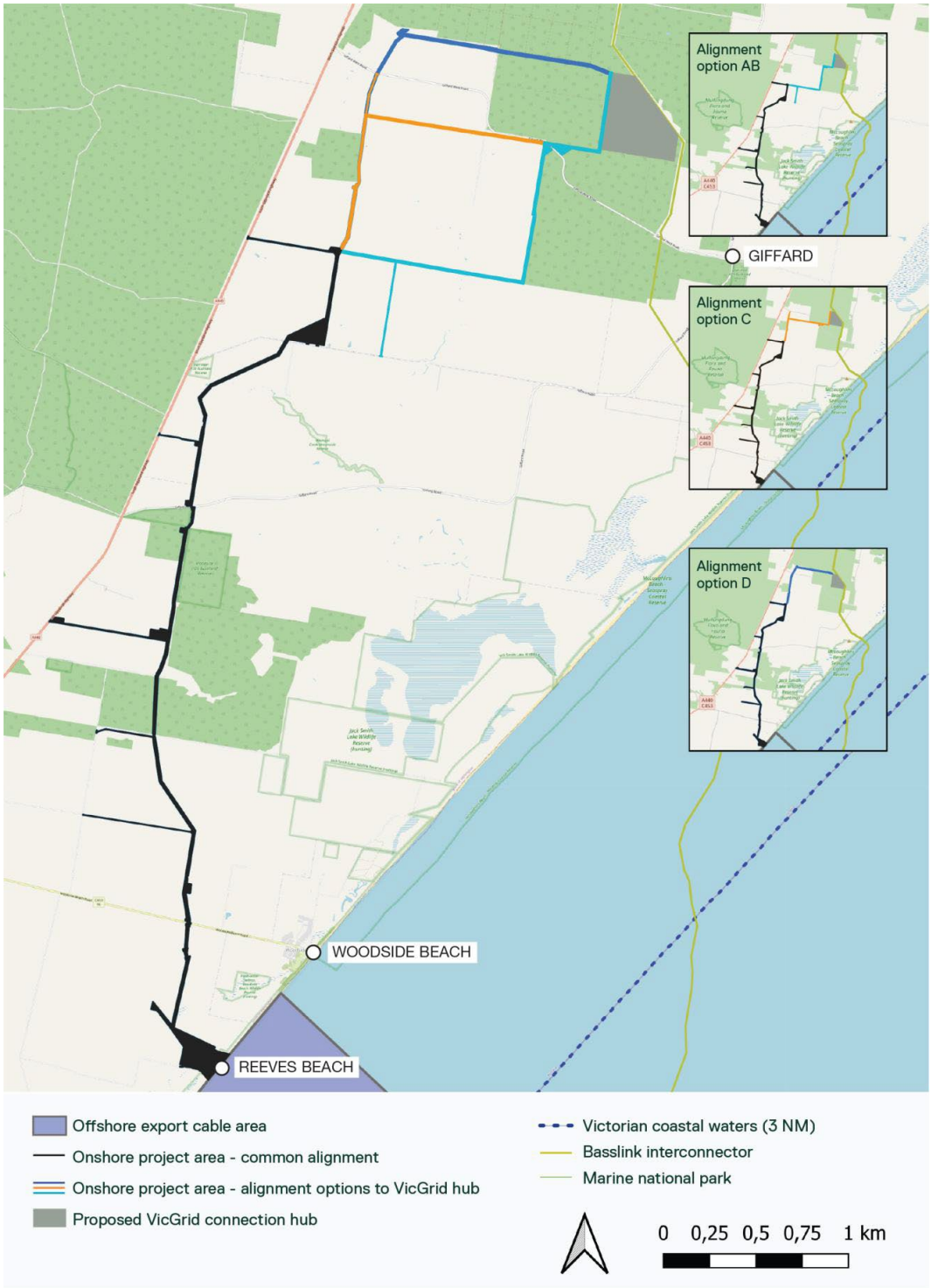
The Project's expected operational life is approximately 30 years.

Figure 2 Victorian project area overview



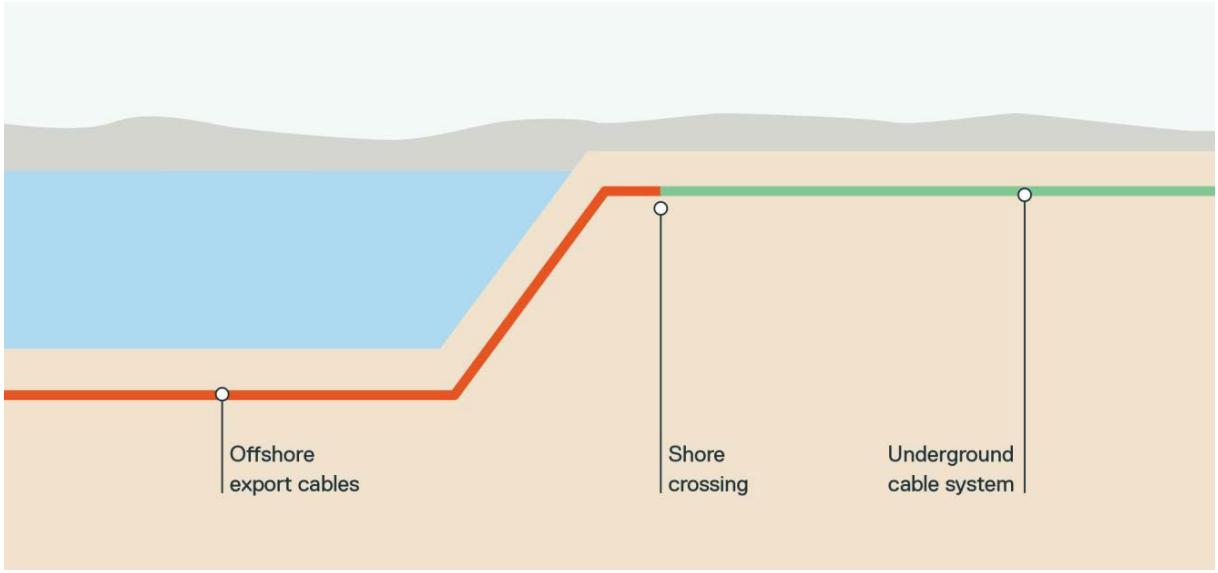
Source: EES Chapter 1

Figure 3 Victorian onshore project area



Source: EES Chapter 1

Figure 4 Diagram of Victorian works



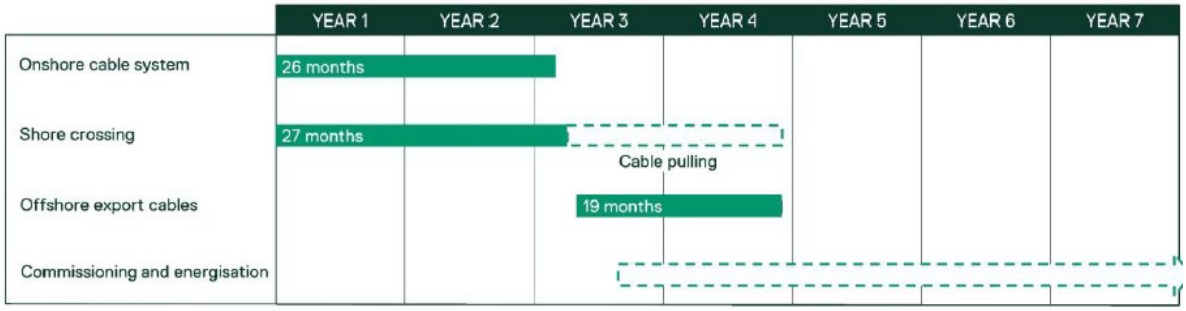
Source: EES Chapter 1

(ii) Victorian work stages and activities

The Victorian works are expected to take up to seven years to complete (see Figure 5).

Table 1 includes a breakdown of activities and timeframes.

Figure 5 Indicative construction schedule



Source: EES Chapter 4

Table 1 Project activities and timeframes

Phase	Key activities

Construction	- Offshore export cables:
	  - site preparation, including pre-construction surveys and seabed clearance where required, followed by installation of up to eight offshore export cables in Victorian waters
	  - may take up to two years
	- Shore crossing:
	  - site establishment, drilling and installation of up to eight underground ducts using trenchless construction, followed by cable pulling and connection to the onshore system
	  - drilling and duct installation comprises site establishment (up to 6 months), drilling and duct installation (10 to 18 months, with each bore requiring 4-6 weeks of actual drilling typically 24 hours per day

Phase	Key activities
	for 7 days a week) and demobilisation (up to 3 months) - occurs during the offshore export cable installation program - Onshore transmission: - site establishment, trenching and other crossings, cable installation and jointing, pre-commissioning and commissioning, followed by demobilisation and rehabilitation - may take up to 26 months
Operation	- routine inspection and maintenance of the Project infrastructure and repairs where required across the life of the Project - offshore cable inspections approximately every 3–5 years, with repairs undertaken if required - shore crossing maintenance will be minimal with periodic inspections
Decommissioning	- decommissioning will occur at the end of the Project's operational life in accordance with regulatory requirements and management plans applying at that time - most below-ground onshore infrastructure is expected to remain in place (cable ends will be cut, sealed and securely buried) - the seabed will be returned to baseline conditions as far as practicable - surface infrastructure may be removed where required

(iii) Construction methods

Onshore and shore crossing construction

Proposed offshore construction methods include:

- Open trench crossings - where impacts are relatively low, such as at minor roads, tracks and watercourses. This involves excavating a trench, installing conduits/cables, then backfilling and reinstating the surface.
- Horizontal Directional Drilling (HDD) - a trenchless method where a bore is drilled beneath the feature being crossed and ducts are pulled through. This is used to minimise environmental and community impacts at sensitive locations including the shore crossing.
- Micro-tunnelling - a trenchless technique that uses a tunnel boring machine to install a cased tunnel beneath the crossing before conduits are installed.
- Auger boring - similar to micro-tunnelling but using a rotating auger to excavate material while installing a casing pipe beneath the crossing.

Offshore construction

Proposed offshore construction methods include:

- Seabed preparation - debris removal and seabed levelling where required.
- Installation of the cables – typically ploughing to lay and bury the cables simultaneously, or mechanical trenching using cutting wheels or chains.
- Jet trenching - high pressure water jets fluidising the sediment allowing the cables to sink to the required burial depth.

- Where sufficient burial depth cannot be achieved, placing protective materials such as rock armour or concrete mattresses over the cables.

(iv) Maximum design scenarios

As the Project's final design and specifications were not confirmed when the EES was prepared, the EES used a project design envelope[1] approach to define a range of designs and parameters that could potentially be constructed for the Victorian works. Each technical assessment identifies a Maximum Design Scenario (MDS) based on the combination of design parameters that represents the greatest potential (worst case) impact or risk. Different technical reports adopted different MDSs depending on the parameters most relevant to the environmental matter being assessed.

EES Chapter 4 (Project description) explains the Project Design Envelope and MDS approach in more detail. It states the approach:

- provides enough information to assess the Project
- uses a cautious approach which gives confidence that impacts will remain within predicted levels
- allows Project details to be refined after approval when more information is available
- supports the use of new technologies and innovations to achieve Project objectives and environmental outcomes.

[1] EES Chapter 4 states a project design envelope is "*A flexible project definition that sets clear upper and lower limits for design, construction, operation and decommissioning to inform environmental assessment…This allows for the assessment of a range of design options, rather than a single, fixed proposal. It ensures that the impacts of all options are considered, while maintaining flexibility for ongoing project refinement and innovation*".

2 Impact assessment and approvals

2.1 Commonwealth and Victorian environmental assessments

The Overall Project is subject to separate Commonwealth and Victorian environmental assessment processes because it extends across Commonwealth and Victorian jurisdictions.

The Overall Project was determined to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) (EPBC Act) and is being assessed through an Environmental Impact Statement (EIS). Matters of National Environmental Significance (MNES) relating to both Commonwealth works and Victorian works are being assessed through the separate Commonwealth EIS process under the EPBC Act.

The Victorian works were separately referred under the *Environment Effects Act 1978* (EE Act), with the Minister for Planning (Minister) determining on 11 May 2020 that an EES was required. The Minister issued *Scoping Requirements for Star of the South Offshore Wind Farm Environment Effects Statement*, August 2021 (Scoping Requirements), which set out the specific matters to be investigated and documented in the EES as they relate to the Victorian works.

The Scoping Requirements establish evaluation objectives for the EES. The evaluation objectives:

- identify the desired outcomes in the context of relevant legislation and policy, the principles and objectives of Ecologically Sustainable Development and environment protection, including net community benefit
- provide a framework for integrated assessment of environmental effects and evaluation of the overall implications of the Project.

The EIS and EES were exhibited concurrently. The Commonwealth works and Victorian works have separate Environmental Management Frameworks, applying to the works within the respective jurisdiction.

The consideration of matters of national environmental significance (MNES) or the EIS prepared under the EPBC Act (including as it relates to MNES in and on Victorian waters and Victorian land) is outside the scope of this Report.

2.2 The EES

(i) EES documents

The EES includes a summary report, 27 main report chapters and 26 technical assessments. The technical reports were prepared to inform both the Commonwealth EIS and Victorian EES assessment processes, and the EES chapters present the assessment relevant to the Victorian works (see Table 2).

Table 2 EES documents

EES chapters and Attachments	Technical reports and Attachments
Chapter 1 (Environment Effects Statement introduction)	Technical report A (Coastal processes and sediment transport)
Chapter 2 (Project rationale)	Technical report B (Benthic ecology)
Chapter 3 (Victorian works project development)	Technical report C (Fish and invertebrates)
Chapter 4 (Victorian works project description)	Technical report D (Marine mammals and turtles)
Chapter 5 (Victorian legislative framework)	Technical report E (Offshore ornithology and bats)
Chapter 6 (Assessment framework)	Technical report F (Marine protected areas)
Chapter 7 (Community engagement)	Technical report G (Onshore ecology)
Chapter 8 (Onshore ecology)	Technical report H (Groundwater)
Chapter 9 (Groundwater)	Technical report I (Surface water)
Chapter 10 (Surface water)	Technical report J (Soil and waste)
Chapter 11 (Soil and waste)	Technical report K (Aboriginal cultural heritage)
Chapter 12 (Agriculture and forestry)	Technical report L (Historical heritage)
Chapter 13 (Onshore Aboriginal cultural heritage)	Technical report M (Non-Aboriginal underwater cultural heritage)
Chapter 14 (Historical heritage)	Technical report N (Commercial and recreational fisheries)
Chapter 15 (Electromagnetic field exposure)	Technical report O (Infrastructure and co-existence with other users)
Chapter 16 (Onshore noise and vibration)	Technical report P (Shipping and navigation)
Chapter 17 (Traffic and transport)	Technical report Q (Business and tourism)
Chapter 18 (Air quality)	Technical report R (Social)
Chapter 19 (Submerged Aboriginal cultural heritage)	Technical report S (Agriculture and forestry)
Chapter 20 (Social)	Technical report T (Land use and planning)
Chapter 21 (Business and tourism)	Technical report U (Seascape, landscape and visual)
Chapter 22 (Land use and planning)	Technical report V (Electromagnetic field exposure)
Chapter 23 (Victorian marine environment)	Technical report W (Onshore noise and vibration)
Chapter 24 (Victorian marine protected areas)	Technical report X (Traffic and transport)
Chapter 25 (Commercial and recreation fisheries in Victorian waters)	Technical report Y (Air quality)
Chapter 26 (Victorian Environmental Management Framework)	Technical report Z (Submerged Aboriginal cultural heritage)
Chapter 27 (EES summary and conclusions)	Attachment I (Underwater noise modelling)
Attachment I (EES map book)	Attachment II (Oil spill modelling summary)
Attachment II (Consultation report)	
Attachment III (Draft planning scheme amendment)	
Attachment IV (EES scoping requirements checklist)	

(ii) Environmental Management Framework

EES Chapter 26 includes the proposed Environmental Management Framework (EMF). The EMF includes mitigation measures which build on the recommendations in the technical reports and are intended to avoid, minimise or manage potential environmental and social impacts. The EMF also includes a governance framework for implementing the mitigation measures, including roles and responsibilities for implementation, monitoring and reporting.

(iii) Draft Planning Scheme Amendment

EES Attachment III includes the draft Wellington Planning Scheme Amendment C129well (draft PSA). The draft PSA proposes to amend the Wellington Planning Scheme (Planning Scheme) to apply the Specific Controls Overlay Schedule 3 (SCO3) to land required for the Victorian works and incorporate the Star of the South Offshore Wind Farm Incorporated Document (Incorporated Document) into the Planning Scheme.

The Incorporated Document would provide the principal planning approval for the Victorian works and establish requirements for development and use, including approval of the final alignment based on an Alignment Plan and implementation of the EMF.

2.3 Legislative and statutory approvals

EES Chapter 5 (Legislative and Policy Framework) sets out the relevant legislation and key statutory approvals. The Project will require the following primary approvals:

- amendments to the Planning Scheme under the *Planning and Environment Act 1987* (PE Act)
- consent under the *Marine and Coastal Act 2018* (MAC Act) for the use and development of marine and coastal Crown land between the outer limit of Victorian coastal waters and 200 metres inland of the high-water mark of the sea
- Cultural Heritage Management Plan (CHMP) approval by the Registered Aboriginal Party (RAP) under the Aboriginal Heritage Act 2006 (Aboriginal Heritage Act).

Table 3 shows the secondary approvals that may be required.

Table 3 Secondary approvals

Legislation	Approval description
Crown Land (Reserves) Act 1978, *Forests Act 1958* and *Land Act 1958*	Lease agreements required for Project development within Crown lands and seabed
Electricity Industry Act 2000	Licence to generate and transmit electricity for supply or sale
Environment Protection Act 2017 (EP Act)	No specific approval required, the Project must comply with the General Environmental Duty
Fisheries Act 1995	Section 72 permit to take, injure or remove Victorian protected aquatic species

Legislation	Approval description
Flora and Fauna Guarantee Act 1988 and *Flora and Fauna Guarantee Amendment Act 2019*	Sections 48 and 52 permit to remove listed flora and fish
Forests Act 1958	Section 52 licence or permit for activities on Crown land in a reserved forest
Heritage Act 2017	Section 124 permit to disturb Victorian Heritage Inventory items; Section 77 permit for impacts to shipwrecks and shipwreck artefacts
Road Management Act 2004	Section 16 of Schedule 7 consent to temporarily occupy and access roads
Traditional Owner Settlement Act 2010	Land use agreement with the relevant Native Title holder
Water Act 1989 (Water Act)	Section 67 licence to construct on a waterway; Section 51 take and use licence for groundwater extraction; Section 67 bore construction licence
Wildlife Act 1975	Section 28A authorisation to take wildlife

Source: EES Chapter 5, extract of Table 5-1

3 The Inquiry

3.1 Terms of Reference

(i) Role of Inquiry

On 14 May 2026, the Minister appointed the Inquiry to inquire into and report on the environmental effects of the Project in accordance with its Terms of Reference (see Appendix A).

The role of the Inquiry is set out in clauses 4 and 5 of the Terms of Reference as follows:

4. The Inquiry is appointed by the Minister for Planning (the Minister) under section 9(1) of the Environment Effects Act 1978 (EE Act) to hold an inquiry into and report to the Minister on the environmental effects of the Victorian works on the Victorian environment, which entails:
    a. reviewing and considering the content of the EES (covering Victorian works) and submissions received on the EES in relation to the effects of Victorian works on the Victorian environment (including cumulative effects arising from the project's Victorian works with other projects anticipated in Victoria);
    b. considering and reporting on the significance and acceptability of the environmental effects of the Victorian works on the Victorian environment, having regard to relevant policy and legislation;
    c. identifying any additional mitigation measures and/or project modifications beyond those identified in the EES to avoid, mitigate or manage the likely significant environmental effects of the Victorian works on the Victorian environment consistent with relevant policy, legislation and best practice; and
    d. advising on how these modifications and measures, referenced in paragraph 4c, should be implemented through the necessary Victorian approvals and Victorian consents needed for the project.
5. The Inquiry must produce a report of its findings and recommendations, to be provided to the Minister. This report will inform the Minister's assessment under the EE Act of the environmental effects of the project's Victorian works.

(ii) Scope of Inquiry

The Inquiry must limit the scope of its proceedings to the environmental effects of the Victorian works on the Victorian environment associated with the referred matters. Referred matters include Key Victorian Matters and Other Victorian Matters as described in Clauses 10 and 11 of the Terms of Reference:

10. The 'Key Victorian Matters', associated with the potentially significant effects from Victorian works on the Victorian environment, are:
    a. onshore ecology;
    b. Victorian marine environment and marine protected areas;
    c. coastal processes;
    d. Aboriginal cultural heritage;
    e. construction impacts confined to onshore noise and vibration, soil and waste; and
    f. the Environmental Management Framework and draft PSA [Planning Scheme Amendment] to the extent relevant to the management of the matters listed from (a) to (e) in this clause.
11. The 'Other Victorian Matters', which are less likely to have significant environmental effects from Victorian works on the Victorian environment, are:
    a. business and tourism;

b. groundwater and surface water;
c. social;
d. traffic and transport;
e land use impacts; and
f. the Environmental Management Framework and draft PSA to the extent relevant to the management of the matters listed from (a) to (e) in this clause.

The Inquiry sought clarification on the referred matters as discussed in Chapter 4 below.

(iii) Inquiry processes

The Terms of Reference require the Inquiry to consider Key Victorian Matters using a submitter conference process, and Other Victorian Matters by written submissions.

The Terms of Reference require the submitter conference be conducted in accordance with the following principles (Clause 30):

a. it will be conducted in an open, orderly and equitable manner, in accordance with the principles of natural justice;
b. the submitter conference needs to be conducted with a minimum of formality and without legal representation being necessary for parties to be effective participants;
c the submitter conference is to be exploratory and constructive, focusing on understanding and resolving matters; and
d. adversarial behaviour is not permitted and questioning of experts and submitters needs to be regulated by the Inquiry in the context of resolving matters and these principles.

The Terms of Reference allow for expert evidence on Key Victorian Matters as part of the submitter conference process, but specify there must be no expert evidence on Other Victorian Matters.

3.2 Exhibition and submissions

The EES was exhibited from 18 May to 29 June 2026. A total of 51 submissions were received (see Appendix D) from:

- Wellington Council
- South Gippsland Shire Council (South Gippsland Council)
- Bunurong Land Council Aboriginal Corporation (BLCAC)
- Three State government departments/agencies:
  - Department of Energy, Environment and Climate Action (DEECA)
  - Environment Protection Authority Victoria (EPA)
  - West Gippsland Catchment Management Authority (WGCMA)
- Nine local community and environmental groups:
  - Birdlife East Gippsland
  - Committee for Gippsland
  - Dolphin Research Institute
  - Friends of the Koalas Inc.
  - -Gippsland Climate Change Network
  - Gippsland Coastal Assembly
  - No Offshore Turbines Ninety Mile Beach
  - Responsible Future (Illawarra Chapter) Inc. (Responsible Future)
  - Surfers for Climate
- Six businesses and industry organisations:

  - APA Group
  - HVP Plantations
  - Mitchelson Fisheries
  - National Trust of Australia (Victoria)
  - Seafood Industry Victoria Inc. (SIV)
  - Wildlife Coast Cruises Pty Ltd
- 30 individual submitters.

3.3 Inquiry's approach and procedural issues

(i) Assessment approach

Clause 40(a) and Clause 40(b) of the Terms of Reference require the Inquiry to provide:

- analysis and conclusions on the significance and acceptability of environmental effects for the Key Victorian Matters and Other Victorian Matters
- findings on whether acceptable environmental outcomes can be achieved having regard to legislation, policy and best practice.

For each referred matter, the Inquiry has considered the significance of effects, the effectiveness of mitigation measures, and whether the proposed approval and implementation framework provides sufficient certainty that acceptable environmental outcomes can be achieved.

The Inquiry considered the draft PSA within the scope of referred matters. It focused primarily on the draft Incorporated Document and SCO3 extents, and whether the draft PSA provides an appropriate framework for reducing or mitigating significant environmental effects and implementing relevant mitigation measures. The Inquiry did not undertake a detailed review of all components of the draft PSA.

The Inquiry has considered the exhibited material, all written submissions received in response to the exhibited material, evidence, submissions and other material provided to the Inquiry during its process. All material put before the Inquiry has been considered, although not all of that material is specifically referenced in this Report.

(ii) Processes

The Inquiry ran two concurrent processes including:

- submitter conference to consider evidence and submissions on the Key Victorian Matters
- written submissions process to consider Other Victorian Matters.

The Inquiry issued directions for the Proponent and parties to:

- limit submissions to the matters relevant to each Inquiry process
- focus on and structure submissions around each of the referred matters.

Appendix C outlines how the submitter conference was conducted, and Appendix F provides details of parties and experts who participated in the Inquiry processes.

Submitter conference

The submitter conference process included:

- Proponent opening submissions
- submitter submissions
- theme-based discussions around two of the Key Victorian Matters (onshore ecology and marine and coastal environment and processes) with participants including the Proponent, experts (called by the Proponent) and representatives of parties wishing to participate
- Proponent closing submissions.

Following discussion with parties before and during the submitter conference, it was determined that theme-based discussions were not required on Aboriginal cultural heritage and construction impacts (noise and vibration, soil and waste).

The Inquiry circulated a list of issues for discussion before each of the theme-based discussions (Document 69).

Consistent with its Terms of Reference (Clause 30c) the Inquiry encouraged the Proponent and parties to work together to resolve issues where possible. The Inquiry directed the Proponent to advise the Inquiry of any resolved issues, with supporting evidence from the relevant party confirming the agreed position.

Written submissions process

The written submissions process included a sequenced exchange of written submissions in relation to the Other Victorian Matters:

- Further submissions:
  - Parties were invited to make further written submissions on the Other Victorian Matters by 6 August 2026.
  - Submitter 42, who had registered to participate in the written submissions process, filed further written submissions on Other Victorian Matters (Document 67). No other parties who elected to participate provided further written submissions.
  - Some parties who participated in the submitter conference but did not elect to participate in the written submissions process raised Other Victorian Matters in their written and verbal submissions. While these submitters had not elected to participate in the written submissions process, the Inquiry determined that the issues they raised about the Other Victorian Matters would still be considered through the written submissions process.
- Inquiry questions:
  - The Inquiry put questions about Other Victorian Matters to the Proponent on 14 August 2026 (Document 81) and invited the Proponent to respond by Friday, 21 August 2026 or with its closing submissions
- Proponent closing submissions:
  - The Proponent provided a response to issues raised in relation to Other Victorian Matters on 18 August 2026 (Documents 87 and 89).

Project documentation

The Inquiry directed the Proponent to provide updates to Project documentation including the EMF and draft Incorporated Document in response to evidence and submissions.

The Proponent circulated updated versions of the Project documentation during the submitter conference, including:

- updated versions of the EMF, including its version 3 EMF (Document 85)
- version 1 draft Incorporated Document (Document 59).

All parties were given the opportunity to provide written comments on the version 3 EMF and version 1 draft Incorporated Document at the end of the submitter conference. The following documents were received:

- drafting comments on Proponent's version 1 draft Incorporated Document and version 3 EMF from No Offshore Turbines Ninety Mile Beach (Documents 97 and 98)
- drafting comments on Proponent's version 3 EMF from EPA Victoria (Document 99).

The Proponent provided DEECA with updated versions of the EMF (version 2) and draft Incorporated Document (version 1) showing its proposed changes in response to DEECA's submission (Documents 93a and 93b). DEECA advised it supported the draft Incorporated Document as revised and provided further comments on the EMF (Document 93).

In response to comments received, the Proponent circulated its final preferred versions of the Project documentation (Final Day Project documentation) as follows:

- version 4 EMF (Documents 106 and 107) (Final Day EMF)
- version 2 draft Incorporated Document (Documents 104 and 105) (Final Day Incorporated Document).

The Inquiry has had regard to all party comments on the Final Day EMF in developing its recommendations.

The Inquiry generally supports the Proponent's Final Day Project documentation subject to the changes recommended in this Report. The Inquiry has based its recommendations on Final Day Project documentation, as shown in the Inquiry's recommended versions at Appendix H (EMF) and Appendix I (draft Incorporated Document).

(iii) Inquiry Report

The Terms of Reference require the Inquiry's Report to:

- include information and analysis of the significant environmental effects, sufficient to support the Inquiry's findings and recommendations (Clause 41)
- focus on the Key Victorian Matters (Clause 41a)
- include information and depth of analysis proportionate to the significance of the environmental effects (Clause 41a)
- address Other Victorian Matters at a high level, having regard to the relative significance of the likely effects (Clause 41c)
- simply record matters the Inquiry determines have minor or negligible impacts and can be readily addressed through standard and proven environmental management techniques (Clause 43).

This Report is structured into the following parts, chapters and appendices:

- Part A: Introduction and background
  - Chapter 1: Overall Project and Victorian works
  - Chapter 2: Impact assessment and approvals
  - Chapter 3: The Inquiry
  - Chapter 4: Preliminary issues
  - Chapter 5: Response to Terms of Reference and recommendations
- Part B: Key Victorian Matters

Chapter 6: Onshore ecology

Chapter 7: Victorian marine environment and marine protected areas

Chapter 8: Coastal processes

Chapter 9: Aboriginal cultural heritage

Chapter 10: Onshore construction impacts (noise, vibration, soil and waste)

- Part C: Other Victorian Matters
  - Chapter 11: Business and tourism
  - Chapter 12: Groundwater and surface water
  - Chapter 13: Social
  - Chapter 14: Traffic and transport
  - Chapter 15: Land use impacts
- Part D: Appendices
  - Appendix A: Terms of Reference
  - Appendix B: Correspondence regarding clarification of referred matters
  - Appendix C: Submitter conference process
  - Appendix D: Procedural matters
  - Appendix E: Submitters to the EES
  - Appendix F: Parties to the Inquiry process
  - Appendix G: Document list
  - Appendix H: Inquiry recommended Environmental Management Framework
  - Appendix I: Inquiry recommended Incorporated Document.

The Inquiry has applied the principle of proportionality in determining the level of assessment and reporting for each referred matter. It has focused its detailed consideration on impacts that warrant further examination because of their significance, issues raised in submissions or other material before the Inquiry, or matters requiring findings or recommendations.

For matters where the Inquiry is generally satisfied that the impacts are minor or negligible and that the relevant impact pathways are capable of being appropriately managed through established regulatory requirements, recognised industry practice and environmental management techniques – the Inquiry has findings under the heading 'Clause 43 matters'.

Not every impact identified in the EES is discussed separately in this Report. Where an impact does not warrant further analysis, the Inquiry generally accepts the EES assessment.

(iv) Procedural matters

Appendix D includes procedural matters related to the Inquiry processes including:

- Request for information
- Amendments to mapping
- Procedural matters raised by Responsible Future before the Directions Hearing
- Submission 43 name change request
- Evidence of Dr Mike Mackie
- Responsible Future written submission
- Late correspondence from No Offshore Turbines Ninety Mile Beach.

3.4 Limitations

The Inquiry has assessed the significance and acceptability of environmental effects having regard to referred matters, as required by its Terms of Reference and following the processes specified in the Terms. The Inquiry has not undertaken a review of Project documentation as it relates to matters not referred, and Inquiry's recommendations (see Appendices H and I) focus on the referred matters.

The Inquiry is not tasked with recommending whether the Project should be approved.

The process requirement of the Terms of Reference did not permit evidence to be called in relation to Other Victorian Matters. Accordingly the Inquiry has relied on the EES chapters, technical reports and submissions.

The Terms of Reference specify the Inquiry must not:

- consider or make findings on matters of national environmental significance (MNES) or the EIS prepared under the EPBC Act
- examine or report on the EES process or consultation undertaken.

While the Inquiry has considered interactions between environmental effects of referred matters where relevant, however it has not undertaken an integrated assessment. The Terms of Reference do not require an integrated assessment of the Victorian works.

While the Terms of Reference do not require an assessment against evaluation objectives (as a framework for integrated assessment) the Inquiry has used these as a reference for assessing whether effects are acceptable.

The Inquiry has not assessed the environmental effects on the VicGrid Connection hub land as they were not assessed through the technical reports, as discussed in Chapter 15.2.

4 Preliminary issues

4.1 Scope of Inquiry

On 26 June 2026, the Inquiry wrote to the Department of Transport and Planning (DTP) (State Planning Assessment and Facilitation) seeking clarification of which construction impacts were intended to be included in its scope (Document 4, see Appendix B).

DTP clarified that it intended the Inquiry's scope to include (Document 5, see Appendix B):

- construction impacts associated with the Key Victorian Matters listed in Clauses 10(a) to 10(d) of the Terms of Reference
- construction impacts associated with the Other Victorian Matters listed in Clauses 11(a) to 11(e)
- construction impacts associated with offshore works including, but not limited to, noise, vibration, soil and waste, insofar as they occur within Victorian waters and emanate from Victorian works, as per paragraph 10(b)
- construction impacts referred to in the EMF or draft PSA which relate to matters listed in Clauses 10(a) to 10(d) and Clauses 11(a) to 11(e).

DTP advised that operational and decommissioning impacts associated with onshore noise, vibration, soil and waste are excluded from the Inquiry's scope.

The Inquiry invited the Proponent to provide its interpretation. Its interpretation was generally consistent with DTP's clarification, and it provided a more detailed interpretation of how Clauses 9 to 11 operate. It interpreted (Document 19):

> the Key Victorian Matters and Other Victorian Matters to encompass the construction, operation and decommissioning of the Victorian works, except for the topics of noise, vibration, soil and waste which are expressly limited by clause 10(e) to construction.

The Proponent considered these effects may be relevant where they form an impact or risk pathway for another referred matter. The EMF and draft PSA are within scope to the extent they relate to matters expressly identified in Clauses 10 and 11.

The Inquiry accepts the clarification provided by DTP and interpretation of the Proponent. As such, the Inquiry has approached its task on the understanding that the following matters are withing scope:

- construction, operation and decommissioning of the Victorian works insofar as their effects relate to the Key Victorian Matters and Other Victorian Matters (including offshore)
- onshore noise and vibration and soil and waste are limited to construction impacts
- the EMF and draft PSA are relevant insofar as they relate to the management of matters identified in Clauses 10 (a-e) and 11 (a-e).

4.2 Extrapolation of Overall Project effects

The Proponent explained that most onshore technical assessments considered the Victorian works directly, while the offshore Technical Reports generally assessed the Overall Project (Commonwealth and Victorian works). The offshore EES chapters

involved extrapolating the effects relevant to the Victorian works from the Overall Project assessment. The Proponent submitted that approach was conservative because the Overall Project ratings were generally retained without downgrading to only consider the impact of Victorian works on the Victorian environment.

This approach is acceptable. The EES assessment is generally conservative as the same ratings as the Overall Project are applied to the smaller Victorian works. The EES must still clearly identify any effects specific to the Victorian works and this has been considered for each relevant matter. The Inquiry is satisfied the approach has not resulted in any material effects of the Victorian works being overlooked or underestimated.

4.3 Cumulative effects

Many submitters questioned whether the EES appropriately assessed the cumulative impacts of the Victorian works with other projects, particularly given the number of energy and infrastructure projects proposed in Gippsland. Clause 4(a) of the Inquiry's Terms of Reference requires it to consider cumulative effects arising from the Victorian works together with other projects anticipated in Victoria.

The Proponent explained that each technical report applied a four-stage cumulative assessment process to the Overall Project. This involved identifying potentially relevant[2] projects, shortlisting them, gathering available information and assessing cumulative effects. The projects were assigned a level of certainty according to their status and the information available.

The Proponent explained that cumulative impacts differed between referred matters:

- Most onshore cumulative impacts were non-existent or low, and cumulative effects on terrestrial ecology did not change the relevant impact or risk ratings.
- Greater potential for cumulative effects was identified for traffic, social and business and tourism matters, particularly in relation to workforce, housing, accommodation and traffic.
- An assessment of cumulative impacts on Aboriginal cultural heritage was not possible due to lack of information about other projects.
- Offshore cumulative effects were generally assessed as low to negligible.

The Inquiry considers the approach to cumulative impacts is reasonable. It accepts the approach, unless otherwise stated in other chapters of this Report. The level of assessment that can be undertaken depends on the status of other projects and the information available about them. Cumulative impacts and any necessary management measures are considered as relevant to each referred matter.

[2] Relevance is determined with reference to the particular referred matter being assessed. The relevant projects may not be the same in all technical reports.

4.4 Drafting

The Terms of Reference require the Inquiry to make recommendations on the draft PSA and EMF (including structure and content). The Inquiry has provided Inquiry recommended versions of both documents (see Appendices H and I). In reviewing the Final Day Project documentation, the Inquiry has suggested some drafting changes to improve clarity and consistency. For example, the Inquiry has noted various references to the 'Communications and Stakeholder Engagement Plan' and 'Stakeholder Engagement Plan'. The Inquiry has recommended drafting changes to consistently refer to 'Communications and Stakeholder Engagement Plan'.

The Inquiry has not undertaken a wholesale drafting review of the Project documentation and recommends this be done before the documents are finalised. This review should include:

- introduction and consistent use of acronyms and abbreviations
- consistent use of terms to describe stages of the Project in Table 26-7, such as pre-construction and prior to construction
- confirming that all relevant Project stages have been included for each mitigation measure
- consistent use of names for management plans
- ensuring mitigation measure numbers are unique to specific mitigation measures
- ensuring responsibility is assigned based on statutory responsibility.

5 Response to Terms of Reference and recommendations

5.1 Terms of Reference response

Clauses 40 - 42 of the Inquiry's Terms of Reference specify what the Inquiry's Report must contain. Table 4 outlines where each of these are addressed in this Report.

Table 4 Response to Terms of Reference report requirements

Requirement	Relevant part of this Report
Clause 40	
Analysis and conclusions on the significance and acceptability of environmental effects with respect to the 'Key Victorian Matters' and 'Other Victorian Matters'	Chapters 6 to 15
Findings on whether acceptable environmental outcomes can be achieved, having regard to legislation, policy and best practice	Executive summary and Chapters 6 to 15
Recommendations and/or specific measures that it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects	Chapter 5.2 and Chapters 6 to 15
Recommendations relating to any feasible modifications to the design or management of the project necessary to reduce or mitigate significant environmental effects	Chapter 5.2 and Chapters 6 to 15
Recommendations for any appropriate conditions or requirements that may be lawfully imposed on any approval for the project, including the draft PSA, necessary and appropriate to reduce or mitigate significant environmental effects	Chapter 5.2 and Chapters 6 to 15
Recommendations as to the structure and content of the proposed Environmental Management Framework, including monitoring of environmental effects, reporting on the effectiveness of mitigation measures, contingency plans and site rehabilitation	Chapter 5.2 and Chapters 6 to 15
Clause 41	
The report needs to include information and analysis of the significant environmental effects, sufficient to support the Inquiry's findings and recommendations. Without limiting this requirement, the report needs to:	Chapters 6 to 15

a. focus on the 'key Victorian matters'; b. include information and depth of analysis proportionate to the significance of the environmental effects; and c. address 'Other Victorian Matters' at a high level, having regard to the relative significance of the likely effects.	
Clause 42	
A list of all recommendations, including cross-references to relevant discussions in the report	Chapter 5.2
A description of the submitter conference conducted, and a list of parties heard through the submitter conference	Overview, Chapter 3.1, Chapter 3.3(ii), Appendix C (submitter conference process), Appendix F (parties to the Inquiry process), Appendix D (procedural matters)
A list of the documents tabled during the Inquiry proceedings	Appendix G
A list of all submissions collected by PPV on the exhibited EES including the draft PSA, including clear indication of submissions that were considered with respect to 'Other Victorian Matters'.	Appendix E

5.2 Recommendations

Table 5 cross-references the Inquiry recommendations with the relevant chapters in this Report.

Table 5 Inquiry recommendations

Inquiry recommendations		Report reference
Overarching recommendations		**Executive summary**
If the Project proceeds, the Inquiry recommends: • Amend the Environmental Management Framework as shown at Appendix H of this Report, subject to reviewing for consistency and to address any consequential changes resulting from other recommendations in this Report. • Amend the draft Incorporated Document as shown at Appendix I of this Report, subject to addressing any consequential changes resulting from other recommendations in this Report.		
Key Victorian matters		**Part B**
Onshore ecology		**Chapter 6**
Native vegetation	Amend the Environmental Management Framework as follows: a) Amend FFM-M001 (Avoidance of impacts to ecological values during the design phase) to add:	Chapter 6.2

Inquiry recommendations		Report reference
	Where available and practicable native vegetation offsets shall be sourced from within Wellington Shire Council local government area.	
Threatened flora	Amend the Environmental Management Framework as follows: a) Amend FFM-M013 (Site reinstatement and rehabilitation) to include actions to develop appropriate compensatory measures for the direct loss of Pale Swamp Everlasting and Coast Grey-box.	Chapter 6.36.4
Threatened fauna	No recommendations	Chapter 6.4
Koala	Amend the Environmental Management Framework as follows: a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to include identification of zones to reduce speed limits in areas of extensive koala habitat	Chapter 6.5
Habitat loss and degradation	Amend the Environmental Management Framework as follows: a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to require an artificial hollow program to be developed in consultation with the Department of Energy, Environment and Climate Action and which documents the actual hollow losses, specifies the replacement ratio and the artificial hollow type or types to be used, records the number and location of artificial hollows and provides for an audit on the program.	Chapter 6.6
Onshore biosecurity	No recommendations	Chapter 6.7
Victorian marine environment and marine protected areas		**Chapter 7**
Benthic ecology	No recommendations	Chapter 7.2
Marine protected areas	No recommendations	Chapter 7.3
Underwater noise	No recommendations	Chapter 7.4
Vessel interactions	No recommendations	Chapter 7.5
Marine biosecurity	No recommendations	Chapter 7.6
Oil spill	Amend the Environmental Management Framework as follows: a) Amend Mitigation Measure SPL-M02 (Spill Response Plan) to require the Spill Response Plan to be prepared in consultation with the Department of	Chapter 7.7

Inquiry recommendations		Report reference
	Transport and Planning, and update Table 26-4 (List of CEMP sub plans and other management documents) and Table 26-6 (List of OEMP sub plans and other management documents) accordingly.	
Coastal processes		**Chapter 8**
Coastal processes	Amend the Environmental Management Framework as follows: a) Include mitigation measure MEMP-M05 (Coastal monitoring) (unless a similar mitigation measure is included in the Commonwealth Environmental Management Framework) as shown in the recommended Environmental Management Framework, and specify that the monitoring should continue for the operational life of the Project.	Chapter 8
Aboriginal cultural heritage		**Chapter 9**
Aboriginal cultural heritage	Amend the Environmental Management Framework as follows: a) Amend Section 26.5.3 (Decommissioning) to refer to updating and implementing the Traditional Owner Engagement Plan. b) Amend ACH-M006 (Traditional Owner Engagement Plan) to ensure the 'mitigation outcome' refers to engagement, and to require the measure be applied through all stages of the Project including pre-construction and decommissioning. c) Amend ACH-M002 (Cultural Values Assessment) to require a Cultural Values Assessment be prepared before construction commences in conjunction with Bunurong Land Council Aboriginal Corporation as relevant to the Project. d) Remove references to the "OEI Act" [Offshore Electricity Infrastructure Act 2021 (Cth)].	Chapter 9
Onshore construction impacts		**Chapter 10**
Onshore construction noise and vibration	Amend the Environmental Management Framework as follows: a) Amend ONV-M002 (Out of hours construction noise mitigation measures) to specify that an environmental auditor reviews and verifies that all planned and unplanned night-time works are justified in accordance with EPA Publication 1834.2 and that all reasonable work practices have been considered. b) Amend ONV-M005 (Unavoidable works – Shore crossing drilling – noise control) to specify an	Chapter 10.2

Inquiry recommendations		Report reference
	environmental auditor review and verifies that all night-time works have been justified in accordance with Section 4.4 of EPA Publication 1834.2, and that all reasonably practicable work practices have been considered.	
Soil and waste	Amend the Environmental Management Framework as follows: a) Amend SOL-M005 (Management of Acid Sulfate Soil) to require the Acid Sulfate Soils Management Plan be prepared prior to construction, implemented during construction, and be reviewed and verified by an environmental auditor as complying with the relevant guidelines and legislation.	Chapter 10.3
Other Victorian Matters		**Part C**
Business and tourism		**Chapter 11**
Local businesses	Amend the Environmental Management Framework as follows: a) Amend BTM-M005 (Workforce Development Strategy) to require minimisation of local labour workforce competition and consider cumulative impacts on the workforce demand and measures to reduce impacts on local businesses if required.	Chapter 11.2
Agriculture and forestry	No recommendations	Chapter 11.3
Commercial and recreational fisheries	Amend the Environmental Management Framework as follows: a) Amend CRF-M08 (Compensation for impacted commercial fishers) and specifically the Fisheries Liaison and Coexistence Plan, by clarifying when the plan applies, how it relates to the other management plans, the notification requirements and parameters for the compensation process.	Chapter 11.4
Groundwater and surface water		**Chapter 12**
Groundwater and surface water	No recommendations	Chapter 12
Social		**Chapter 13**
Workforce accommodation	Amend the Environmental Management Framework as follows: a) Amend BTM-M006 (Workforce Accommodation Strategy) to expressly require the strategy include requirements around monitoring and reporting, thresholds or triggers for action and contingency measures that include consideration of cumulative	Chapter 13.2

Inquiry recommendations		Report reference
	impacts.	
Reeves Beach campground	Amend the Environmental Management Framework as follows: a) Amend SOC-M003 (Stakeholder Engagement Plan) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change. b) Amend BTM-M004 (Consultation with Parks Victoria) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change.	Chapter 13.3
Community benefits	Amend the Environmental Management Framework as follows: a) Amend BTM-M003 (Develop and implement a community benefit fund) to require the governance structure, including arrangements for administration and approval of funding, to be co-designed with the beneficiary communities and Councils.	Chapter 13.4
Traffic and transport		**Chapter 14**
Transport	Amend the Environmental Management Framework as follows: a) Amend TTP-M002 (Traffic management plan) to require preparation of the Traffic Management Plan pre-construction, and implementation during construction.	Chapter 14.2
Land use impacts		**Chapter 15**
VicGrid connection hub	Amend the draft Incorporated Document as follows: a) Remove references to VicGrid connection hub works and approvals. Amend the draft Wellington Planning Scheme Amendment C129well maps to remove the VicGrid connection hub site.	Chapter 15.2
Landowner impacts	Amend the draft Incorporated Document as follows: a) Amend Clause 6.4 to include expressly list affected landowners as parties to consult regarding changes to the Alignment Plan. b) Add a new Clause which states: *The* control *in this Incorporated Document ceases to apply to any Project Land that is not included in the endorsed Alignment Plan, 12 months after registration of all required easements on property titles where the Project is located, unless otherwise agreed in writing by the Minister for Planning.*	Chapter 15.3

PART B: KEY VICTORIAN MATTERS

6 Onshore ecology

6.1 Background

The following EES Chapters and technical reports are relevant to onshore ecology:

- Chapter 8 (Onshore Ecology)
- Technical Report G (Onshore Ecology).

Table 6 shows the relevant Evaluation Objective.

Table 6 Evaluation objective – onshore ecology

Impact/effect	Evaluation objective
Biodiversity and habitat	To avoid, and where avoidance is not possible, minimise, potential adverse effects on protected native vegetation and listed threatened species and their habitat and listed ecological communities, in both onshore and offshore environments, as well as address offset requirements consistent with state policies.

Table 7 shows the relevant legislation, policy and guidelines.

Table 7 Relevant legislation, policy and guidelines – Onshore ecology

Legislation	Policy/guidelines
- Catchment and Land Protection Act 1994 - Conservation, Forests and Lands Act 1987 - Flora and Fauna Guarantee Act 1988 (FFG Act) - Forests Act 1958 - Wildlife Act 1975 - Wildlife Regulations 2024	- Assessor's Handbook – Applications to remove, destroy or lop native vegetation (DEECA, 2025) - Guidelines for the removal, destruction or lopping of native vegetation (DEECA, 2025) (Native Vegetation Guidelines) - Victorian Koala Management Strategy (DEECA, 2023) - Protecting Victoria's Environment - Biodiversity 2037 (DEECA, 2017) (Biodiversity 2037) - National Light Pollution Guidelines for Wildlife (DCCEEW, 2023)

Expert evidence was given by the following experts on behalf of the Proponent:

- Brett Lane (onshore ecology)
- Dr Claire Greenwell (seabirds).

6.2 Native vegetation

(i) The issues

The issues are whether the:

- impacts of native vegetation removal have been appropriately assessed
- avoidance and minimisation steps are adequate
- unavoidable losses will be appropriately offset

- residual impacts are acceptable.

Related issues are addressed in other chapters of this Report includes habitat loss and degradation (see Chapter 6.6).

(ii) What did the EES say?

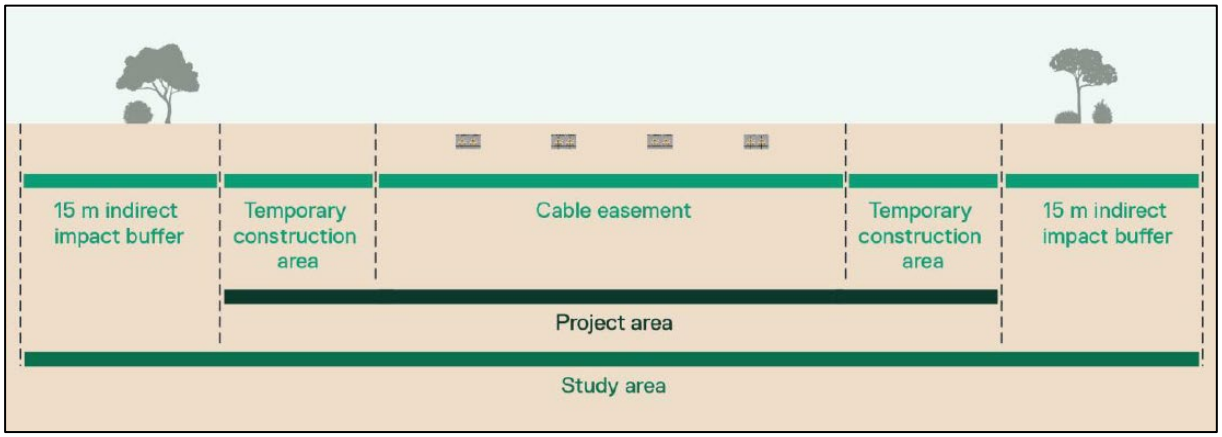
The Victorian works require the removal of native vegetation for the onshore transmission infrastructure, including the transmission construction corridor and associated infrastructure.

The EES described the Project area as encompassing historically cleared or modified coastal and lowland landscapes, comprising predominantly agricultural land and plantations, with remnant native vegetation in reserves, along roadside and on private land, and numerous ephemeral waterways.

Native vegetation is primarily restricted to roadsides and small conservation reserves, with scattered trees and smaller patches in agricultural areas. It is represented by ten Ecological Vegetation Classes (EVCs), with the most dominant vegetation type being Plains Grassy Forest which is vulnerable in the Gippsland Plain Bioregion. Native vegetation, including trees, was mapped by accredited assessors between 2020 and 2025 in accordance with the Native Vegetation Guidelines.

Native vegetation was assessed across the common alignment and alignment options (see Figure 3). The study area[3] included the transmission easement and construction corridor, generally extending 15 metres to either side (see Figure 6). Ultimately, native vegetation removal would be limited to the final alignment and associated construction corridor (once selected after the detailed design process).

Figure 6 Onshore project area and study area



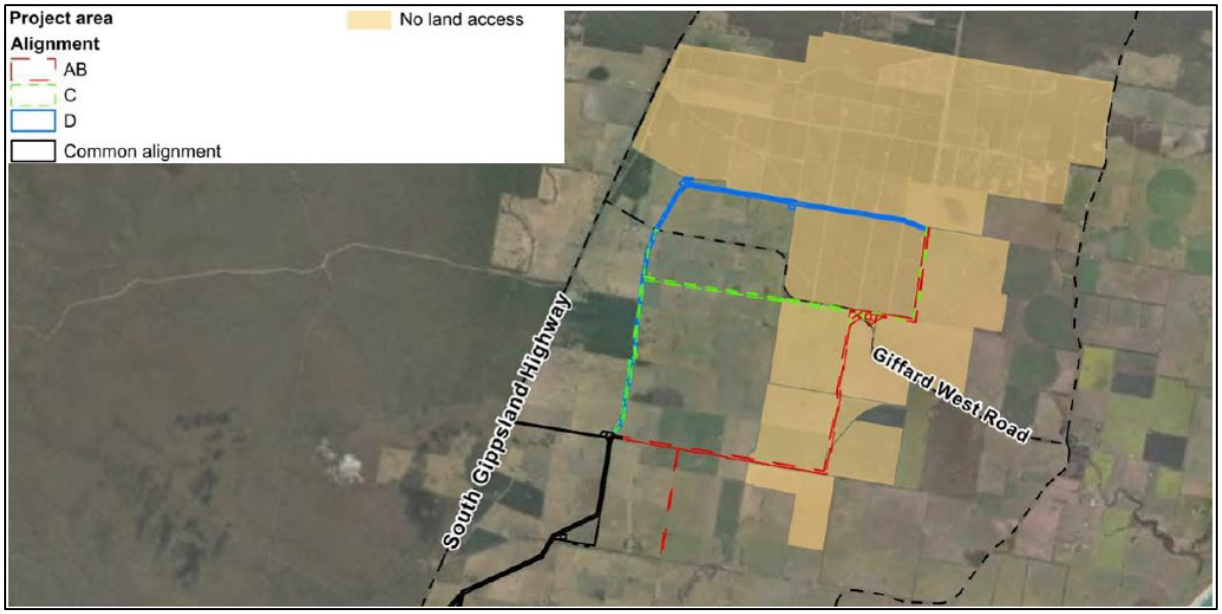
Source: EES Chapter 8

A limitation of the assessment was lack of access to and survey of approximately 12 percent of the Project area (Figure 7 shows the inaccessible areas). This land was assessed using a series of precautionary assumptions which the EES describes as

[3] Study area for native vegetation assessment in the EES

conservative as they over-state the extent, condition and number of patches and trees affected.

Figure 7 Inaccessible areas



Source: Technical Report G, Figure 6-3 (excerpt)

The precautionary assumptions were:

- the DEECA modelled native vegetation layer was used to identify patches and habitat, adopting the highest modelled condition rating for the purposes of calculating offsets
- the highest DEECA-modelled habitat score was applied to each DEECA-mapped habitat zone
- every tree identified was from aerial photography was assigned to the large size class
- all large trees were assumed to be hollow-bearing.

The EES quantified the extent and significance of native vegetation potentially removed under the three alignment options, based on field surveys supplemented by desktop information and the assumptions where access was unavailable. The three-step approach of avoid, minimise and offset was applied as required by the Native Vegetation Guidelines.

Key mitigation measures include:

- FFM-M001 (Avoidance of impacts to ecological values during the design phase)
- FFM-M002 (Prepare an Environmental Line List)
- FFM-M003 (Prepare and implement a Construction Environmental Management Plan [CEMP] and subplans)
- FFM-M005 (Prevent construction impacting on retained vegetation and habitat not approved for removal).

Table 8 includes a summary of the proposed native vegetation removal for each alignment option.[4] The common alignment affects about 0.25 hectares of the western boundary of Woodside H28 Bushland Reserve. Due to the conservative nature of this assessment, including the 15-metre buffer zone on either side of the construction area within each alignment, it is anticipated further avoidance can be achieved through the detailed design.

Table 8 Summary of the proposed native vegetation removal for each alignment option

Native vegetation feature	Option AB	Option C	Option D
Patches	15.009 ha across 78 habitat zones	16.142 ha across 93 habitat zones	15.531 ha across 74 habitat zones
Large trees in patches	54	66	65
Scattered trees – large	28	53	42
Scattered trees – small	12	31	12

Source: EES Chapter 8

Overall the EES concluded the removal of native vegetation was unavoidable and the:

- residual impact of native vegetation removal (regardless of the alignment option) during construction was major
- residual risks relating to impacts on native vegetation during operation was low, and decommissioning was very low.

The EES stated that while the impacts will be long term, permanent and localised, the extent of loss is unlikely to be significant at the regional or State scale (less than 0.001 percent of the modelled native vegetation in the Gippsland Plains Region and in Victoria).

Residual impacts are proposed to be offset in accordance with the Native Vegetation Guidelines including up to 8.197 General Habitat Units (with a minimum strategic biodiversity score of 0.394) and 119 large trees. For the general offsets, available third-party offsets have been identified within Wellington Council municipality and WGCMA areas.

The EES identified potential cumulative impacts on native vegetation, trees and threatened species habitat, but concluded these would not alter the assessed impact ratings or proposed mitigation measures for the Project.

(iii) Evidence and submissions

Native vegetation assessment and mitigation measures

Several submitters raised general concern about vegetation and habitat loss without identifying a specific measure or detailed concern.

[4] The Inquiry understands this to be the proposed native vegetation removal for the whole of each alignment option including the common alignment section

Responsible Future raised concerns regarding the uncertainty of the Project area and design, and lack of access for survey to some areas. It submitted that key design and construction details and associated native vegetation removal details should be resolved before any approvals.

DEECA was satisfied that the mapping and assessment of native vegetation was generally consistent with the applicable Native Vegetation Guidelines and provided an adequate basis to assess potential native vegetation impacts.

DEECA submitted that FFM-M001 (Avoidance of impacts to ecological values during the design phase) should be amended to include:

- additional vegetation mapping including threatened ecological communities,
- the identification of notional root zones for retained trees in accordance with the native vegetation guidelines
- further design to avoid and minimise "prioritising areas such as Lyons Road, Woodside H28 Bushland Reserve, waterways and hollow bearing trees" and
- updated mapping, and re-verification of site condition scores once inaccessible sites have been accessed.

DEECA sought amendments to the draft Incorporated Document to strengthen:

- controls over native vegetation removal, including information about native vegetation removed for preparatory buildings and works (Clause 6.12)
- requirements to ensure that preparatory buildings and works cannot be undertaken until appropriate assessment of impacts has been undertaken and mitigation measures are implemented (Clause 6.14).

DEECA advised it supported the Proponent's amendments to the Version 3 EMF and draft Incorporated Document in relation to native vegetation (which are reflected in the Final Day versions).[5]

Mr Lane supported DEECA's suggested modifications to FFM-M001 and explained the removal of native vegetation was unavoidable but had been minimised as much as possible. He stated while the total quantum of native vegetation loss is substantial it is not of one contiguous patch and overall the extent of loss "*is unlikely to be significant (<0.001%)*".

Mr Lane noted that while field surveys were not undertaken in some parts of the study area (where landholder permission was not granted) precautionary assumptions were made including:

- the modelled native vegetation layer from [DEECA] was used to identify patches of native vegetation and habitat (aerial photo interpretation revealed that much of the vegetation in the DEECA mapping had been cleared so this approach likely significantly over-estimated native vegetation removal)
- The highest DEECA-modelled habitat score was applied to the DEECA mapped habitat zone
- Trees identified through aerial photo interpretation were assigned to the 'large' size class, likely over- estimating the impact of the project on such trees

[5] Document 93

- All large trees were assumed to be hollow-bearing, again, a highly conservative assumption.

Mr Lane explained this approach "*almost certainly over-estimates the extent, condition and number of native vegetation patches and trees, and the presence of fauna habitat, the risk that important ecological values exist in unsurveyed areas and have not been accounted for is considered low*".

Specific to the Woodside H28 Bushland Reserve, Mr Lane considered that impacts on the reserve have been avoided and substantially minimised through alignment refinement and reduced construction widths. Further opportunities to reduce impacts should continue to be pursued through detailed design.

Mr Lane supported DEECA's proposed changes to FFM-M001 and recommended replacement wording for FFM-M001, FFM-M002, FFM-M006 and FFM-M015 (set out in Appendix 3 to his statement). He did not recommend any change to the offset quantum.

The Proponent explained the native vegetation assessment was in accordance with the Native Vegetation Guidelines. It considered the assumed native vegetation losses assessed in the EES are based on a conservative MDS and further reductions would be achieved through detailed design.

In response to DEECA's submission the Proponent proposed to amend Clause 6.12 of the draft Incorporated Document to require:

- information about proposed native vegetation removal to be provided to the satisfaction of the Secretary of DEECA
- the extent of removal to be generally in accordance with the Minister's Assessment, subject to changes arising from micro-siting or other requirements of the draft Incorporated Document and EMF
- biodiversity impacts from removal to be offset in accordance with the Native Vegetation Guidelines
- evidence that offsets have been secured.

It said the changes to Clause 6.12 would ensure removal is ultimately offset in accordance with the Native Vegetation Guidelines. It also accepted Mr Lane's recommendations and updated the mitigation measures accordingly.

Offsets

Wellington Council and the National Trust of Australia (Victoria) raised concerns about the location of offsets, in particular the proximity to the areas where native vegetation is removed. Wellington Council supported sourcing native vegetation offsets, including large trees, as close as possible to the Project area.

Mr Lane explained that third-party offset sites are currently available that meet the Project's offset obligations within Wellington Shire and WGCMA areas. He supported the measure to seek offsets close to the Project area conditionally noting it is not required under Native Vegetation Guidelines.

The Proponent did not support this, stating it would seek to source offsets locally where practicable. It did not support making this mandatory because the Native Vegetation Guidelines establish the statutory offset requirements.

(iv) Inquiry assessment

The Inquiry is satisfied that the assessment method is robust and followed the Native Vegetation Guidelines, including the three-step approach. Measures to avoid and minimise removal are adequate, and residual impacts are acceptable. The calculation of offsets and potential to secure offsets is accepted, though measures to source offsets locally should be sought where practicable. Notably DEECA generally accepted the assessment approach and advised that the Proponent's proposed changes to the EMF and draft Incorporated Document generally addressed its recommendations.

The EES has sufficiently identified and quantified the native vegetation likely to be affected. The EES approach undertaken to assess unsurveyed areas was reasonable, supported by Mr Lane and accepted by the Inquiry. FFM-M001 requires a further assessment of this land to assess any information gap and Clause 6.12 provides the approval safeguard before any removal occurs. The assessment provides an adequate basis to understand impacts.

Native vegetation loss is an unavoidable outcome of the Project. Depending on the final alignment, approximately 15 to 16 hectares of native vegetation patches would be removed, together with large trees within patches and scattered trees. The Inquiry accepts Mr Lane's evidence that the impact of removal is moderated though its distribution across numerous discrete habitat zones rather than to a single contiguous patch. A range of design measures reduce the extent of native vegetation removal, particularly the use of HDD for the shore crossing and avoidance of sensitive areas.

The EES rated the residual impact of native vegetation removal as major. The Inquiry accepts that rating and considers the residual impact acceptable, given the distribution of the loss, its small extent relative to the modelled native vegetation in the region, and that it will be offset in accordance with the Native Vegetation Guidelines.

Woodside H28 Bushland Reserve warrants particular consideration because the Victorian works will remove native vegetation from land managed for conservation purposes. Impacts on this sensitive location have been appropriately avoided and minimised by confining native removal to its edge and confining the construction footprint, maintaining the overall function of the reserve as a recreational conservation area.

FFM-M001 appropriately includes steps to further avoid and minimise impacts during the detailed design phase, including specific locations for focus, such as Woodside H28 Bushland Reserve. The EMF includes appropriate steps to manage impacts on native vegetation during construction. FFM-M001 in the Final Day EMF was supported by DEECA and are accepted by the Inquiry. The changes provide important mechanisms for the continued application of the three-step approach.

Specific to the VicGrid connection hub land, the proposed native vegetation provisions at Clause 6.8 of the Final Day Incorporated Document are discussed at Chapter 15.2.

When read with the EMF, Clause 6.12 of the Final Day Incorporated Document provides an appropriate mechanism to ensure that the final vegetation impacts remain consistent with the EES assessment and applicable native vegetation requirements. Importantly, the approval framework allows for continued application of avoidance and minimisation

measures, with the final offset to be determined based on ultimate native vegetation removal.

The Inquiry supports a non-binding preference for locally sourced offsets. This would complement but not override the Native Vegetation Guidelines requirement to secure offsets in the broader Catchment Management Authority boundary. Offsets located close to the loss are more likely to hold the same EVCs and local genetic stock, so they more closely replace what is removed, and they avoid the progressive depletion of those EVCs in the local landscape that occurs when the loss and the offset are separated. Mr Lane supported in this approach in principle.

The Victorian works would contribute to cumulative native vegetation removal in the region, however the contribution is not expected to materially alter the cumulative impacts identified in the EES, subject to implementing the mitigation measures as recommended.

(v) Findings

The Inquiry finds, subject to its recommendations:

- the impacts of native vegetation removal have been appropriately assessed
- the avoidance and minimisation steps are adequate
- the unavoidable losses will be appropriately offset
- the residual impacts are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend FFM-M001 (Avoidance of impacts to ecological values during the design phase) to add:

Where available and practicable native vegetation offsets shall be sourced from within Wellington Shire Council local government area.

6.3 Threatened flora

(i) The issues

The issues are whether:

- impacts on threatened flora have been adequately assessed
- impacts on threatened flora can be appropriately avoided, minimised, compensated and managed
- residual impacts on threatened flora are acceptable.

Related issues are addressed in other chapters of this Report including:

- native vegetation (see Chapter 6.2)
- habitat loss and degradation (see Chapter 6.6).

(ii) What did the EES say?

The Victorian works have the potential to affect FFG Act-listed threatened flora through construction of the onshore transmission infrastructure. Potential direct impacts include removal of threatened flora and potential habitat, while indirect impacts include excavation, dust and compaction affecting the viability of retained plants. Two categories of flora are relevant:

- threatened flora species listed under the FFG Act
- protected flora, a wider class of native plants protected under that FFG Act on public land, for which a permit is required to take regardless of whether the species is listed as threatened.

The EES was informed by targeted surveys that were undertaken for 27 FFG Act-listed threatened and protected flora species identified through desktop assessment as known, likely or possibly occurring within the study area. The surveys were undertaken between 2020 and 2024. As noted in Chapter 6.2 there was lack of access to and survey of around 12 percent of the Project area.

Three listed flora species were observed within the Project area, and a further three listed orchid species were determined as having potential to occur. The EES quantified the predicted (three species) and potential loss of habitat (three species) under each alignment option (see Table 9).

Table 9 Threatened flora recorded in the Victorian works area

Flora species	FFG Act Status	Option AB	Option C	Option D
Observed species				
Pale Swamp Everlasting	critically endangered	0.653 ha, 10 plants	0.653 ha, 10 plants	0.653 ha, 10 plants
Coast Grey-box	endangered	22 individuals	22 individuals	22 individuals
Dune Wood-sorrel	endangered	0.106 hectares	0.106 hectares	0.106 hectares
Species predicted with potential to occur				
Dense Leek-orchid	critically endangered	0 hectares	0 hectares	0.233 hectares
Cobra Greenhood	endangered	3.007 hectares	4.501 hectares	4.076 hectares
Spiral-leaved Sun-orchid	endangered	2.346 hectares	3.563 hectares	3.371 hectares

Source: Technical Report G (adapted by the Inquiry)

No FFG Act-listed threatened ecological communities were recorded within the study area or assessed to potentially occur.

The EES incorporated design avoidance measures and proposed further avoidance and minimisation through detailed design, no-go zones and an Environmental Line List, with

pre-construction surveys to confirm the extent of threatened flora. Habitat temporarily disturbed by construction would be revegetated as far as reasonably practicable. Key mitigation measures include:

- FFM-M001 (Avoidance of impacts to ecological values during the design phase)
- FFM-M002 (Prepare an Environmental Line List)
- FFM-M003 (Prepare and implement a CEMP and subplans)
- FFM-M005 (Prevent construction impacting on retained vegetation and habitat not approved for removal)
- FFM-M009 (Protect values within conservation reserves).

It also includes a 'Project monitoring and contingency measure' FFM-M015 (Targeted survey for protected flora on public land) which requires targeted surveys of public land to inform an application for take under the FFG Act.

The EES concluded that some threatened flora and potential habitat would be lost. The residual impact of clearing native vegetation which supports listed threatened flora is minor to moderate depending on the species.

An FFG Act permit to take protected flora will be required for threatened flora that cannot be retained on public land. Mitigation measure FFM-M015 (Targeted survey for protected flora on public land) requires surveys to inform an application for a FFG Act permit and engagement with DEECA on any additional information required before that application. The EES concluded the localised loss of individuals or discrete populations is unlikely to result in a significant impact on any species.

The EES considered that losses of FFG-listed flora are localised, affect small numbers of individuals or parts of patches rather than whole populations, and for the species recorded the loss is reversible through recruitment of new individuals within the retained and rehabilitated habitat.

Impacts on threatened species potential habitat associated with native vegetation removal would be subject to the offset requirement at Clause 6.12 of the draft Incorporated Document.

The EES identified the Victorian works may contribute to cumulative impacts on threatened flora and habitat from other major projects in the region. The extent of cumulative impacts could not generally be quantified because impacts of some projects were not yet known and the available assessments used different measures of habitat.

(iii) Evidence and submissions

Threatened flora

DEECA was generally satisfied that FFG Act-listed flora species had been adequately surveyed for the purposes of informing the EES but raised the following issues:

- surveys and the assessment of population-level effect are insufficient
- two ecological communities had not been assessed, being the FFG Act listed Plains Grassland (South Gippsland) and the EPBC Act listed Natural Damp Grassland of the Victorian Coastal Plains.

It submitted:

> The impact to individuals and the effect on local populations has not been adequately described in the EES for the purpose of informing whether impacts and associated mitigations are appropriate to achieve an acceptable level of impact. This is reflected in the proposed EMF measures that will require the proponent to undertake further targeted surveys for threatened flora prior to construction. DEECA supports the proposed EMF measures, particularly:
>
> a) FFM-M001 to explore opportunities to further avoid and minimise through detailed design
> b) FFM-M005 to ensure retained threatened flora will be protected during construction and operation
> c) FFM-M015 to undertake further targeted surveys for threatened flora prior to construction to confirm presence and to help inform any required FFG Act permit application.

DEECA sought three changes relevant to threatened flora, including:

- for FFM-M001 to include mapping of native vegetation and threatened ecological communities, identification of threatened flora habitat and targeted survey (or assumed presence) for threatened flora
- for targeted surveys be undertaken on all land proposed to be impacted that had not yet been surveyed
- for FFM-M001 and FFM-M005 to be amended so that, where threatened species are identified in areas not assessed in the EES, those measures apply and any unavoidable impact on protected flora on Crown land is included in an FFG Act permit application.

DEECA was satisfied with the Proponent's proposed changes in the Final Day EMF.

Mr Lane was satisfied the assessment was appropriately precautionary where survey information was incomplete. In unsurveyed areas, potential habitat was identified using available vegetation and habitat information and the potential presence of threatened flora species was taken into account. He considered further surveys during detailed design would confirm threatened flora occurrences and provide an opportunity to avoid and minimise impacts before the construction footprint is finalised.

Mr Lane supported DEECA's suggested changes and recommended FFM-M015 (Targeted survey for protected flora on public land) be included as a mitigation measure, and be expanded to require consultation with DEECA before applying for an FFG Act permit.

The Proponent agreed with DEECA and Mr Lane that targeted surveys for threatened flora with the potential to occur must be completed for all land before construction commences. It proposed to amend FFM-M001 and FFM-M005, and accepted Mr Lane's recommendation to include FFM-M015 as a mitigation measure including new engagement requirements with DEECA.

Threatened ecological communities

DEECA submitted it:

> considers there is insufficient evidence to rule out the presence of [Plains Grassland (South Gippsland)] the community along Lyons Road…..and that there

> is less than 15ha of this community left in Victoria, therefore any impact is significant.

DEECA recommended that avoidance of impacts to this community should be prioritised and, where not possible, compensation may be required as a condition of an FFG Permit. DEECA submitted it may need to consider additional mitigations and potentially compensation as a condition of an FFG Act permit based on the extent of any impacts to protected flora at the time it assesses a permit application to take protected flora.

Mr Lane did not express a view on whether the Plains Grassland (South Gippsland) is present at Lyons Road. He referred to Technical Report G which records that the remnant patches in that location are each less than 0.04 hectares and have been mapped within the broader Swamp Scrub EVC, into which the grassland remnants are being absorbed.

The Proponent relied on the evidence and on the new (relocated monitoring and compensation measure) and expanded mitigation measure FFM-M015, submitting that pre-construction targeted survey will establish what is present before any removal occurs and that this sufficiently accounts for the uncertainty.

Compensatory measures

DEECA questioned whether the minor residual impact rating for Pale Swamp Everlasting was adequately supported, particularly given limited information about the broader local population and the extent to which the loss could be reversed through recruitment.

In response to a question from the Inquiry about compensatory measures that may be needed for direct loss of Pale Swamp Everlasting and Coast Grey-box, Mr Lane advised that additional compensatory measures could be implemented as part of the restoration program, including propagation and replacement plantings. He said such measures are used in other major projects and are relatively easy to implement. He advised that further work would be needed to understand what measures were appropriate and the suitability of the recipient sites, but did not consider a change to the EMF necessary.

The Proponent submitted the compensatory measures may be appropriate, but did not consider these should be specified in FFM-M013 (Site reinstatement and rehabilitation). It agreed with Mr Lane's evidence and said that specifying such measures in FFM-M013 (Site reinstatement and rehabilitation) would reduce needed flexibility.

(iv) Inquiry assessment

The Inquiry is satisfied with the survey effort for threatened flora, and that the measures to avoid, minimise, compensate and offset losses are suitable. The residual impacts are acceptable, subject to specific measures to manage direct loss of threatened flora species.

Multiple surveys were conducted over three separate years targeting 27 threatened flora with the potential to occur within the Project area, and DEECA was generally satisfied with the survey effort and approaches. As discussed in Chapter 6.2, while there is uncertainty about the presence of threatened flora and communities (approximately 12

per cent of the Project area was unavailable for survey) there is sufficient information to understand potential impacts.

The Inquiry supports the Proponent's:

- proposed changes to FFM-M001 (Avoidance of impacts to ecological values during the design phase) and as accepted by DEECA
- new and expanded FFM-M015 (Targeted survey for protected flora on public land) as it provides an appropriate mechanism for confirming what species or communities are present prior to construction.

These provide an appropriate framework for confirming the presence of FFG-listed flora species or communities prior to construction and applying further avoidance and minimisation if needed. This is an adequate safeguard to ensure impacts on threatened flora will be appropriately considered.

The Inquiry is satisfied the uncertainty relating to presence of Plains Grassland (South Gippsland) along Lyons Road can be adequately managed. FFM-M015 requires targeted surveys on public land and Clause 6.12 of the draft Incorporated Document requires native vegetation removal be to the satisfaction of the Secretary of DEECA.

Together the mitigation measures in the Final Day EMF provide an appropriate framework and adequately manages uncertainty. The sequence of measures aligns with the sequence of the works, including survey and mapping before design is finalised, design change before ground disturbance, physical protection during construction and rehabilitation afterwards. Each step is capable of being audited against a documented output.

While the residual impacts on threatened flora are acceptable, the management of unavoidable direct loss would be more consistent with best practice and achieve better outcomes if compensatory measures were secured for the Pale Swamp Everlasting and Coast Grey-box.

The need for flexibility in delivering FFM-M013 (Site reinstatement and rehabilitation) is accepted. Flexibility can be retained and outcomes can be better managed through specific measures to compensate for the direct loss of Pale Swamp Everlasting and Coast Grey-box, with details to be determined in consultation with DEECA.

For these two threatened flora species the EES predicted the greatest direct loss of known individuals, rather than simply potential habitat loss. The EES assessed residual impacts on these species as minor, considering impacts would be localised and reversible through recruitment of new individuals in adjacent habitat. DEECA questioned the sufficiency of information regarding the significance of losing the individuals of Pale Swamp Everlasting. Compensatory measures could feasibly facilitate replacement and recruitment, rather than merely the offset, of direct loss and improve management outcomes. The EMF should include such specific guidance, developed with DEECA.

There is some uncertainty in the cumulative impacts assessment because the ecological effects of other major projects are not yet defined. This reinforces the importance of applying the mitigation hierarchy to the Victorian works and avoiding threatened flora and habitat where practicable. The strengthened pre-construction survey, avoidance

and FFG Act permit arrangements will provide appropriate management to the contribution of the Victorian works to potential cumulative impact.

(v) Findings

The Inquiry finds, subject to its recommendations:

- threatened flora surveys are adequate
- the EES assessment is sufficiently robust, having regard to the uncertainty associated with the lack of site access
- impacts on threatened flora can be appropriately avoided, minimised and managed, and the proposed measures are adequate and implementable
- the residual impacts are acceptable, however additional compensatory measures for the direct removal of known individuals of Pale Swamp Everlasting and Coast Grey-box would be more consistent with best practice and achieve better outcomes.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend FFM-M013 (Site reinstatement and rehabilitation) to require the development of appropriate compensatory measures for the direct loss of Pale Swamp Everlasting and Coast Grey-box.

6.4 Threatened fauna

(i) The issues

The issues are whether:

- threatened fauna surveys are adequate
- impacts on threatened fauna can be appropriately avoided, minimised and managed
- residual impacts to threatened fauna are acceptable.

(ii) What did the EES say?

The Victorian works have the potential to affect FFG Act-listed threatened fauna primarily through the removal of habitat for the onshore transmission infrastructure.

The EES assessed threatened fauna through desktop information, field surveys and targeted surveys. It identified nine threatened bird species, three mammals, two reptiles, two frogs and one fish species as known, likely or possibly occurring within the study area (the Project construction footprint plus 15 metres to either side). The EES quantified potential habitat loss under each alignment option (see Table 10).

Table 10 Summary of impacts to FFG Act threatened fauna

Fauna species	FFG Act Status	Option AB	Option C	Option D
Black Falcon	critically endangered	Loss of small proportion of habitat	Loss of small proportion of habitat	Loss of small proportion of habitat
Chestnut-rumped Heathwren	vulnerable	~4 hectares	~3 hectares	~3 hectares
Gang-gang Cockatoo	endangered	~7 hectares, 13 scattered habitat trees	~9 hectares, 17 scattered habitat trees	~9 hectares, 17 scattered habitat trees
Orange-bellied Parrot	critically endangered	~25 hectares of degraded pasture	~25 hectares of degraded pasture	~25 hectares of degraded pasture
Little Eagle	vulnerable	~9 hectares	~10.5 hectares	~11 hectares
Powerful Owl	vulnerable	~8 hectares	~10 hectares	~10.5 hectares
White-bellied Sea-eagle	endangered	Temporary construction impacts	Temporary construction impacts	Temporary construction impacts
White-throated Needletail	vulnerable	No residual impact	No residual impact	No residual impact
Swift Parrot	critically endangered	~6.5 hectares	~8.5 hectares	~9 hectares
Grey-headed Flying-fox	vulnerable	~8 hectares	~10 hectares	~10.5 hectares
New Holland Mouse	endangered	~4 hectares	~2.5 hectares	~2 hectares
White-footed Dunnart	vulnerable	~9 hectares	~10.5 hectares	~11 hectares
Lace Monitor	endangered	~8 hectares	~10.5 hectares	~10.5 hectares
Glossy Grass Skink	endangered	~2.5 hectares	~2 hectares	~2 hectares
Southern Toadlet	endangered	~4 hectares	~2.5 hectares	~2 hectares
Martin's Toadlet	critically endangered	~6 hectares	~10 hectares	~10.5 hectares
Australian Mudfish	endangered	~6 metres unnamed waterway UFI 42824679	~6 metres unnamed waterway UFI 42824679	~6 metres unnamed waterway UFI 42824679

Source: Technical Report G (adapted by the Inquiry)

Most threatened fauna were assumed present rather than surveyed. Targeted fauna surveys were carried out for Swamp Skink, Glossy Grass Skink, Martin's Toadlet, Growling Grass Frog and Green and Golden Bell Frog. Southern Toadlet was not surveyed.

Other species were surveyed as part of general surveys (observational) or were assumed present based on database records.

Key impact and risk pathways identified for threatened fauna include:

- clearance of native vegetation removing habitat for listed threatened fauna (construction)
- direct fauna injury or mortality (construction)
- fauna mortality from increased traffic (operation).

The EES proposed avoidance through detailed design, no-go zones and the development of an Environmental Line List. A Flora and Fauna Management Plan (FFM-M005) would include species-specific measures and pre-clearing surveys, and temporarily disturbed habitat would be revegetated to restore habitat connectivity as far as reasonably practicable. Key mitigation measures include:

- FFM-M001 (Avoidance of impacts to ecological values during the design phase)
- FFM-M002 (Prepare an Environmental Line List)
- FFM-M003 (Prepare and implement a CEMP and subplans)
- FFM-M005 (Prevent construction impacting on retained vegetation and habitat not approved for removal)
- FFM-M006 (Minimise disturbance, injury, or death of wildlife)
- FFM-M009 (Protect values within conservation reserves).

The EES concluded that residual impacts on FFG Act-listed species are not significant. It assessed the residual impacts on most threatened fauna as negligible to moderate, with moderate residual impacts identified for the New Holland Mouse, Martin's Toadlet and Southern Toadlet.

Where fauna habitat is lost through native vegetation removal, Clause 6.12 of the draft Incorporated Document requires the biodiversity impacts from that removal to be offset in accordance with the Native Vegetation Guidelines.

The EES found the Project would contribute to cumulative loss of habitat for species. The information about potential loss of habitat was available for some projects but not others so a direct comparison could not be drawn and an overall cumulative assessment could not be quantified.

(iii) Evidence and submissions

Survey effort and species-specific management

DEECA was generally satisfied that the EES identified threatened fauna likely to be present and that potential impacts have been adequately assessed, avoided and minimised as far as possible at this stage. It considered residual risks and impacts could be appropriately managed through the EMF, particularly FFM-M001, FFM-M005 and FFM-M006 subject to several amendments.

DEECA sought species-specific management protocols for threatened fauna detected before or during construction including:

- species-specific protocols for Glossy Grass Skink and Swamp Skink, noting the Glossy Grass Skink surveys undertaken were "not sufficient to clearly identify the extent of suitable habitat occupied by the species that will be removed and how individuals will be managed" and the Swamp Skink "is highly cryptic and may still be present, even if undetected in surveys"
- breeding habitat surveys for Martin's Toadlet and Southern Toadlet, noting the targeted surveys were insufficient to detect the species, demonstration that breeding habitat can be retained and disturbance avoided
- buffer protocols during nesting and breeding for Orange-bellied Parrot, White-bellied Sea-eagle and Little Eagle.

DEECA was satisfied with the Proponent's proposed changes to the Project documentation.

Some submitters raised question about the survey of the Orange-bellied Parrot.

Mr Schinkel raised concerns about the lack of assessment for the Southern Bent-wing Bat.

Mr Lane generally supported DEECA's recommendations and suggested updating mitigation measures to FFM-M001 and FFM-M006 with minor updates to FFM-M001, FFM-M002 and FFM-M015.

Mr Lane advised Southern Bent-wing Bat was highly unlikely to occur in the Project area, which is outside its usual range. Dr Greenwell gave evidence that the assessment of bats was limited to species with documented evidence of movement between Victoria and Tasmania or of sea cave use (which does not include the Southern Bent-wing Bat).

Consistent with the recommendations of Mr Lane, the Proponent proposed to amend:

- FFM-M001 (Avoidance of impacts to ecological values during the design phase) to require targeted surveys (or assume presence in suitable habitat for mobile species and species with a limited seasonal survey period) including the Glossy Grass Skink, Swamp Skink, Martin's Toadlet and Southern Toadlet if habitat for these species is proposed to be impacted.
- FFM-M006 (Minimise disturbance, injury, or death of wildlife) to require:
  - pre-clearance surveys
  - translocation of fauna where practicable
  - management protocols to reduce construction disturbance risk (such as works buffer distances during nesting and/or breeding periods) to Orange-bellied Parrots, White-bellied Sea-eagle, and Little Eagle.

The Proponent submitted that the Southern Bent-wing Bat was not assessed because it is highly unlikely to occur in the Project area.

Regarding construction timelines and seasonal dependencies, Mr Lane explained FFM-M006 explained the mitigation measure already requires the Proponent to schedule construction works to avoid the breeding season of threatened fauna species in areas of habitat for those species, where practicable.

The Proponent did not amend FFM-M006, submitting that these are matters that will properly inform the preparation of the Flora and Fauna Management Plan (Document 90).

Noise, vibration and light impact pathways

One submitter raised concerns about the noise, vibration and light effects from the trenchless construction at the shore crossing on threatened birds and other wildlife. The submitter questioned whether light shining for 24 hours a day for over 18 months would affect breeding, nesting and fertility.

Mr Lane advised:

- the proposed mitigation measures largely addressed impacts from noise, vibration and artificial lighting
- constant, relatively low-frequency noise would allow for some wildlife to habituate
- artificial light effects were a greater concern than noise, particularly for the Grey-headed Flying-fox, New Holland Mouse, White-footed Dunnart, Martin's and Southern Toadlets and migratory shorebirds.

Mr Lane was generally satisfied that FFM-M005 (Prevent construction impacting on retained vegetation and habitat not approved for removal) and FFM-M006 (Minimise disturbance, injury, or death of wildlife) address concerns relating to artificial light, however he recommended amending FFM-M006 to best avoid and minimise impacts to White-footed Dunnart and migratory shorebirds.

The Proponent amended FFM-M006 to include:

> At the shore crossing, lighting that is considered lower-impact to terrestrial mammals (and if possible, migratory shorebirds) is to be prioritised'.

Cumulative impacts

Several submitters were concerned about the cumulative impacts of the Victorian works together with other proposed offshore wind developments in Gippsland. Their concerns included bird mortality and habitat fragmentation. One submitter noted that migratory birds do not recognise project boundaries.

Mr Lane did not address cumulative impacts.

The Proponent referred to the cumulative impact assessment in Technical Report G and submitted that "*many of the concerns relating to cumulative effects of other proposed offshore wind developments relate primarily to wind farm infrastructure which is outside the scope of the Inquiry*".

(iv) Inquiry assessment

The Inquiry is satisfied the fauna assessment identified the relevant species with potential to occur and where possible, appropriate targeted surveys were implemented.

The EES provides an adequate basis to assess potential impacts on threatened fauna. Importantly DEECA was generally satisfied with assessment and considered the residual risks could be managed through the EMF, subject to its recommended changes.

Any uncertainty around the presence and extent of habitat for particular species is addressed by assuming potential presence where appropriate, undertaking further surveys before construction and applying species-specific management where threatened fauna are identified. This is an appropriate management framework.

Impacts to the 17 FFG Act-listed fauna species have been appropriately described in terms of the quantum of habitat removed, the condition of that habitat and the significance of the loss based on the MDS. The Inquiry accepts the expert opinion of Mr Lane and Dr Greenwell that Southern Bent-wing Bat is unlikely to be present within the Project area and requires no further assessment. The EES adequately identifies the potential presence of the Orange-bellied Parrot, its potential foraging habitat within the Project area and the potential significance of its removal. Given the poor-quality feeding habitat (pasture) proposed to be removed, this is not of concern.

The residual impacts to threatened fauna are acceptable, noting the importance of developing and implementing the reports and mitigation programs identified within the EMF. Given this, the Inquiry supports ongoing consultation with DEECA, WGCMA and Wellington Council.

The Proponent's proposed changes to FFM-M006 (Minimise disturbance, injury, or death of wildlife) are appropriate, specific and auditable. FFM-M006 requires construction to be scheduled to avoid the breeding season of threatened fauna in areas of their habitat where practicable. The Inquiry accepts that the sequencing and prioritisation of works during breeding seasons can be settled in the Flora and Fauna Management Plan, which is prepared in consultation with DEECA.

The proposed changes to FFM-M001 (Avoidance of impacts to ecological values during the design phase) are also appropriate. The measure requires targeted survey or assumed presence for four FFG Act species (two toadlets and two skinks) before construction. Given the cryptic nature of these species and the relative difficulty to survey, this approach is an adequately robust approach to deal with the current uncertainty associated with their presence. The assumed presence is a conservative basis for assessment. To ensure acceptable outcomes a thorough assessment of risk will still be required for each species once the preferred alignment is selected and surveys complete.

With regards to the management of construction impacts, in particular noise, light and vibration, the Inquiry is satisfied that mitigation measures presented in amended FFM-M006, specifically adherence to the *National Light Pollution Guidelines for Wildlife,* are adequate and implementable.

The Victorian works will contribute to cumulative loss of habitat for some threatened fauna, particularly species dependent on remnant woodland and large or hollow-bearing trees. The inability to fully quantify the impact does not mean there is no cumulative impact but reflects different assessment methods for some projects and uncertainty for others. Subject to the measures for further avoidance and minimisation during detailed design, the contribution of the Victorian works to cumulative impacts can be appropriately managed.

(v) Findings

The Inquiry finds:

- the threatened fauna surveys that informed the EES are adequate
- the mitigation measures described within the EMF are robust and implementable

- residual impacts are likely to be minor or moderate for the most sensitive species and are acceptable.

6.5 Koala

(i) The issues

The issues are whether:

- impacts on the koala have been sufficiently assessed, and can be appropriately avoided, minimised and managed
- impacts on the koala are acceptable.

Related issues are addressed in other chapters of this Report including:

- threatened fauna (Chapter 6.4)
- other common fauna (see Chapter 6.8)
- culturally significant species (see Chapter 9).

(ii) What did the EES say?

The Victorian works have the potential to affect other protected and non-threatened fauna through construction of the onshore transmission infrastructure. Potential impacts include injury or mortality during habitat removal, entrapment in open trenches, vehicle collisions, and disturbance or displacement of fauna occupying retained habitat adjacent to the Project area.

The EES considered fauna habitat within the study area and potential risks to both threatened and non-threatened fauna associated with construction activities.

The EES identified hollow-dwelling birds and mammals, nesting birds, ground-dwelling small mammals, reptiles and frogs as particularly susceptible to injury or mortality during habitat removal.

Technical Report G used Victorian Biodiversity Atlas records and direct observations during field surveys to document the presence of koala, and as a precautionary measure treated all treed EVCs as koala habitat. It quantified the potential habitat loss at 8 to 10 hectares depending on the alignment option, and identified measures directed at protecting the Strzelecki koala. EES Chapter 8 (Onshore ecology) does not include reference to the koala.

Key mitigation measures to reduce impact to fauna (including the koala) include:

- FFM-M004 (contractor training)
- FFM-M005 (Flora and Fauna Management Plan)
- FFM-M006:
  - pre-clearing surveys by suitably qualified wildlife specialists
  - where practicable, avoiding habitat removal during breeding seasons
  - that a suitably qualified wildlife handler holding a current authorisation under the Wildlife Act 1975 salvages wildlife encountered during site clearance).

During construction, the residual impact of direct fauna injury and mortality is assessed as low. During operation, fauna mortality from increased traffic is assessed as low. Other impacts during operation include disturbance to fauna and degradation of retained

habitat may arise from maintenance activities, vehicle movements, noise, weeds and pathogens and other edge effects. The residual impacts are assessed as low following implementation of the OEMP.

Technical Report G (Table 13-3) records a cumulative impact on koala habitat of at least 8 ha of potential habitat, including eucalypt plantations/artificial habitat, with the contributions of the Golden Beach 2 Gas Project and Marinus Link unquantified and those of the other projects unknown.

(iii) Evidence and submissions

Wellington Council submitted that the EES does not recognise that the Project area is home to one of the most genetically diverse and healthiest populations of koalas in Australia. It submitted that mitigation measures should be put in place to protect this important (koala) population.

Friends of the Koalas Inc. and Responsible Future raised concerns:

- the EES does not provide an accurate indication of koala numbers
- the EES fails to refer to Biodiversity 2037 and the *Victorian Koala Management Strategy*
- about differences between maps prepared for different Project assessment and approval processes
- that the information gap justified use of the precautionary principle.

Mr Lane did not consider having accurate koala numbers necessary and stated:

- understanding the distribution was not necessary given the small, localised and temporary nature of impacts
- the EES considered koalas and included associated precautionary measures
- Biodiversity 2037 and the *Victorian Koala Management Strategy* are high level documents and do not contain matters needing to be addressed in the EES
- habitat loss would be localised and reversible and unlikely to affect population viability and the effect of fragmentation negligible.

Mr Lane considered the potential impacts of the transmission easement on habitat fragmentation, during both construction and operations. Easement restrictions will prevent any revegetation with deep-rooted trees. He expected that gap would remain traversable for koalas who commonly move between trees on the ground and found impacts to be negligible.

Mr Lane acknowledged that if unmitigated, construction could result in koala mortality. He stated that the proposed mitigation measures to protect fauna (FFM-M006) was suitable to protect koalas as this measure includes a requirement for pre-construction surveys of habitat to be removed by appropriately qualified, and experienced wildlife spotters to salvage fauna.

Mr Lane recommended amending FFM-M006 (Minimise disturbance, injury, or death of wildlife) to include consideration of reduced speed limits in areas of extensive koala habitat where vegetation adjoin access routes.

The Proponent submitted that the EES appropriately recognised the koala and impacts on other and non-threatened fauna would be appropriately managed through the mitigation measures. It said the Scoping Requirements place particular emphasis instead on listed threatened fauna species. In response to submissions the Proponent proposed to amend FFM-M006 to require:

- design construction fencing to permit koalas to exit construction areas (should they enter)
- where practicable, translocate any fauna detected during surveys, before removal of any vegetation in the survey area.

(iv) Inquiry assessment

In Victoria, koalas are classified as 'protected wildlife' under the *Wildlife Act 1975*. They receive legal safeguards under animal welfare laws but are not 'threatened' under the FFG Act.

The Inquiry is satisfied the koala has been appropriately considered. While EES Chapter 8 does not comment on the species, the Technical Report G assessment appropriately used a reliable database and direct observations during field surveys to document presence, a precautionary approach to map habitat and an assessment of impacts for each alignment option. This approach is adequately robust and targeted koala surveys are not necessary.

FFM-M006 (Minimise disturbance, injury, or death of wildlife) is a conventional and workable approach that includes a combination of pre-clearing survey, trench management with exit ramps and daily inspection, fauna barriers, signage, a licensed wildlife handler and translocation where practicable. The residual ratings of low for direct fauna injury and fauna mortality during construction are accepted.

The Inquiry supports the Proponent's Final Day FFM-M006. The changes will ensure the risk of koala entrapment in fences is appropriately managed and will avoid impacts by requiring fauna detected during pre-construction survey be translocated where practicable.

The Inquiry agrees with Mr Lane that reduced speed limits should be required in areas of extensive koala habitat, and this should be included in the FFM-M006 to reduce risks on the koala population and ensure these are managed to acceptable levels.

The Victorian works will contribute to the cumulative loss of koala habitat in the region. The avoidance, rehabilitation and fauna management measures in the EMF (subject to a recommended modification) provide an appropriate approach to managing that contribution. With these changes, the residual impacts on koalas are acceptable.

(v) Findings

The Inquiry finds, subject to its recommendations:

- impacts on the koala have been sufficiently assessed and can be appropriately avoided, minimised and managed
- the residual impacts to the koala are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to include identification of zones to reduce speed limits in areas of extensive koala habitat.

6.6 Habitat loss and degradation

(i) The issues

The issues are whether:

- habitat loss and degradation have been appropriately assessed and avoided
- impacts can be minimised and managed and are acceptable, including:
  - the loss of hollow-bearing trees
  - fragmentation and habitat connectivity
  - loss of aquatic and riparian habitats
  - potential loss of groundwater dependent ecosystems (GDEs).

Related issues are addressed in other chapters of this Report including:

- native vegetation (see Chapter 6.2)
- threatened fauna (see Chapter 6.4)
- groundwater and surface water quality and movement (Chapter 12).

(ii) What did the EES say?

The Victorian works have the potential to result in the loss, degradation and fragmentation of fauna habitat. Habitat fragmentation may occur where the transmission construction corridor disrupts the continuity of habitat, potentially affecting the movement of fauna. Impact pathways include loss of large and hollow-bearing trees, fragmentation and loss of habitat connectivity, impacts on waterways and riparian habitat and changes to groundwater affecting GDEs.

Large and hollow-bearing trees

The loss of hollow-bearing trees from Victorian native forests is identified as a threatening process under the FFG Act. The EES identified removal of large and hollow-bearing trees as a potential impact of the Project.

Technical Report G identified removal of large and hollow-bearing trees as a direct impact. No detailed field surveys were undertaken to specifically document hollow trees in the Project area, instead the EES used a proxy and assumed that any tree that met the large tree benchmark diameter at breast height contained hollows. Habitat features were assessed by rapid visual inspection from the ground.

The EES stated that native vegetation (including trees with hollows) had been avoided and impacts minimised where possible. Table 11 shows the pre and post mitigation expected reduction in large tree removal for each alignment option (see Figure 3).

Table 11 Summary of the proposed large tree removal for each alignment option

Large Tree Losses	Option AB	Option C	Option D
Pre-mitigation	265	387	309
Post-mitigation	82	119	107

Source: EES Chapter 8 (adapted by the Inquiry)

The construction impact of clearing large scattered trees or trees in patches, and the resulting direct loss of trees providing habitat features for fauna, carries a residual rating of major. The assessment explains that hollows typically take 100 or more years to form and in excess of 200 years for medium-sized hollows. The residual risk remains major following implementation of mitigation measures such as the artificial hollow program (FFM-M006). Residual impacts are considered localised and long-term and will be offset in accordance with the Native Vegetation Guidelines.

Fragmentation and habitat connectivity

Fragmentation is an FFG Act threatening process for fauna in Victoria. The EES assessed the potential for construction and operation of the Victorian works to fragment habitat and disrupt fauna movement.

Areas potentially impacted include vegetated roadsides, waterways with fringing native vegetation and H28 Bushland Reserve (where it adjoins native vegetation on private land). Species potentially affected include reptiles, frogs, ground-dwelling and arboreal mammals, and small birds that depend on continuous areas of vegetation for movement and dispersal.

The transmission route was selected to avoid large tracts of remnant vegetation, with the EES identifying discrete locations where fragmentation may occur. Further avoidance and minimisation is proposed through detailed design, protection of retained habitat through no-go zones and management of construction activities.

The EES rated residual risk of habitat fragmentation as low in the construction phase, and medium in the operation phase (given the relative duration this operational risk endures compared to the construction phase).

The construction corridor is reduced to 40 metres where it intersects roadside vegetation, and trenchless crossings are proposed at McLoughlins Beach – Seaspray Coastal Reserve and Woodside Beach Road. Woodside H28 Bushland Reserve is a recognised constrained point, and the common alignment has been kinked east to avoid the reserve (trenchless crossing under this reserve is not considered feasible).

Following construction, temporarily cleared areas are proposed to be revegetated to restore habitat connectivity as far as reasonably practicable. Cables will be trenched underground sequentially, meaning only part of the works footprint will be trenched at any one time. Breaks in the vegetated corridor will be temporary and localised during construction. The transmission easement must remain clear of deep-rooted vegetation over the cables for the life of the Project resulting in ongoing fragmentation. This accounts for the higher operational impact rating than the construction impact rating.

The EES concluded revegetation should restore habitat links for most affected fauna species over the medium to long term.

Where habitat loss involves the removal of native vegetation, Clause 6.12 of the Final Day Incorporated Document applies and requires the biodiversity impacts of that removal to be offset in accordance with the Native Vegetation Guidelines to the satisfaction of the Secretary to DEECA.

Waterways and riparian habitat

The EES assessed waterways to be highly ephemeral, seasonally inundated channels that provided marginal to unsuitable habitat for threatened fish.

Construction crosses designated waterways including Morris Creek, Warrigal Creek, Hoddinott Creek and Sunville Creek, and unnamed waterway UFI 42824679 at the shore crossing. Generally, these waterways feature Riparian Scrub EVC along the banks and the riparian habitat is described as of low-moderate quality habitat.

The unnamed waterway (reference 42824679) behind the dune crossing is described as Estuarine Wetland EVC which is one of the three EVC's identified in the EES which has high groundwater dependency. The Victorian works proposes to bore under this waterway, however a temporary construction causeway is proposed to be built over it.

Residual impact and risk ratings for waterway and riparian habitat for fauna is rated minor.

Groundwater dependent ecosystems

The EES states that GDEs consist of terrestrial, aquatic and subterranean GDEs. The EVCs with high groundwater dependency are Coast Banksia Woodland, Coastal Dune Scrub and Estuarine Wetland. These occur at the transition joint bays (shore crossing), the joint bays and along the cable trench alignment. Dewatering drawdown is modelled for these three excavation types (see Table 12).

Table 12 Modelled dewatering drawdown by excavation type

Excavation type	Drawdown to the 0.5 m contour	Drawdown to the 0.1m contour	Maximum duration
Cable trenches	6 m	10 m	1.5 days
Joint bays	33 m	63 m	30 days
Transition joint bays (shore crossing)	103 m	161 m	90 days

Source: Technical Report G (adapted by the Inquiry)

One identified risk pathway for GDEs was altered groundwater hydrology declining the extent and health of GDEs (medium risk). Following implementation of FFM-M014 (Prepare and implement a Dewatering Plan) the residual risk is assessed as low.

Cumulative impacts

The EES considered there was potential for cumulative effects, including from additional vegetation and habitat loss, fragmentation and disturbance where project footprints or affected ecological values overlap. The EES concluded the impacts would be limited and would not alter the identified ratings, given the localised nature of the Victorian works and that each project would apply avoidance, minimisation and management principles.

(iii) Evidence and submissions

Large and hollow-bearing trees

DEECA requested the EMF prioritise the retention of hollow-bearing trees, high-quality native vegetation breeding habitat and prevention of habitat fragmentation at the detailed design stage. It submitted that impacts to habitat within Woodside H28 Bushland Reserve should be avoided "*to further ensure potential impacts (particularly fragmentation) are minimised to the greatest extent possible*" and recommended exploring opportunities to use trenchless construction methods, which if not possible then early rehabilitation should be prioritised.

DEECA was satisfied with the Proponent's proposed changes to the EMF.

Mr Lane was satisfied the impacts had been avoided and minimised through alignment selection and refinement, including avoiding larger areas of remnant vegetation. Mr Lane was generally satisfied with the proposed approach stating:

- the assumption that every large tree is hollow bearing is a highly conservative approach that overstates the number of hollows affected
- hollow surveys of a linear infrastructure alignment of this the proposed length would not materially change the outcome
- the number and type of artificial hollows is properly a matter to be settled with DEECA when the artificial hollow program is prepared.

Mr Lane endorsed changes to FFM-M001 (Avoidance of impacts to ecological values during the design phase) to ensure further survey information informs final mapping and avoidance and minimisation.

Mr Lane did not support including hollow replacement ratios in FFM-M006 (Minimise disturbance, injury, or death of wildlife). He said appropriate ratios would depend on the context and he was satisfied:

- the assumption that every large tree is hollow-bearing is a highly conservative approach that over-states the number of hollows affected
- hollow surveys of a linear infrastructure alignment of this the proposed length would not materially change the outcome
- the number and type of artificial hollows is properly a matter to be settled with DEECA when the artificial hollow program is prepared.

The Proponent accepted the recommendations of DEECA and amended FFM-M001 to:

- prioritise avoidance and minimisation of hollow-bearing trees (among other things)
- seek opportunities to avoid and minimise impacts on ecological values including requiring trenchless design in high value areas.

In relation to Woodside H28 Bushland Reserve the Proponent submitted that trenchless crossing under the reserve was not feasible. It proposed amending FFM-M013 (Site reinstatement and rehabilitation) to require rehabilitation of Woodside H28 Bushland Reserve as soon as reasonably practicable (if required), as reflected in the Final Day EMF.

Fragmentation and habitat connectivity

DEECA raised concerns regarding fragmentation and habitat connectivity in high value areas, including habitat at Woodside H28 Bushland Reserve particularly for chestnut-rumped Heathwren. DEECA recommended:

- further avoiding impacts to habitat within Woodside H28 Bushland Reserve to ensure potential impacts (particularly fragmentation) are minimised to the greatest extent possible
- exploring opportunities to use trenchless construction methods at high values areas including Woodside H28 Bushland Reserve, and if not possible then early rehabilitation should be prioritised.

DEECA was satisfied with the Proponent's proposed changes to the EMF.

Mr Lane considered that disruption to movement of fauna is unlikely to be significant because most species are mobile, parts of the roadside vegetation are already discontinuous, and the alignment has been selected to avoid large tracts of remnant vegetation and associated habitat.

Mr Lane identified several locations where the footprint crosses treed corridors, including the Woodside H28 Bushland Reserve, Giffard Road and Four Mile Creek Road. Following rehabilitation, a canopy gap of approximately 20 metres is expected, with connecting groundcover and shrub vegetation to be planted within this disturbed zone. He said the residual risks to fauna from fragmentation were low.

The Proponent proposed changes to FFM-M013 (Site reinstatement and rehabilitation) to require rehabilitation of Woodside H28 Bushland Reserve as soon as reasonably practicable.

Waterways and riparian habitat

In response to questions from the Inquiry, the Proponent advised that the ecological assessment had considered a potential impact area encompassing 3.02 hectares along the alignment of unnamed waterway UFI 42824679, comprising a distance of up to 460 metres to accommodate a 6 metre wide trafficable crossing, within a 10 metre wide direct impact area. It stated the assessment was highly conservative and a significantly smaller direct impact area would be expected.

The WGCMA submitted its interest was in general waterway health and rehabilitation. It sought:

- that it be consulted on the surface water management content of the CEMP (FFM-M003)
- stronger controls on erosion, sedimentation and contamination affecting waterways (FFM-M008)
- express provision for the rehabilitation of stream sides, beds and banks following construction (FFM-M013).

The Proponent's Final Day EMF addressed the concerns of the WGCMA and all matters were resolved. It confirmed by email that the changes to the EMF met its submission and that it had no outstanding issues.

Groundwater dependent ecosystems

Wellington Council raised concerns about whether temporary groundwater drawdown could affect GDEs, and how quickly the affected ecological values would recover. Other submitters raised similar concerns.

Mr Lane advised that significant impacts to GDEs and associated values were unlikely during onshore construction because groundwater in the affected areas is generally deeper that the proposed trench and joint-bay excavations.

He said riparian vegetation and scrub associated with creek lines and EVC closer to the coast had greater potential to be impacted where groundwater was shallower. Nevertheless, he considered the estimated extent of potential drawdown effects was likely conservative and noted these ecosystems are already exposed to natural fluctuations in groundwater levels.

The Proponent submitted that with implementation of FFM-M014 (Prepare and implement a Dewatering Plan) the residual risk to GDEs is low.

(iv) Inquiry assessment

Large and hollow-bearing trees

The Inquiry is satisfied that the loss of hollow-bearing trees has been adequately assessed and that subject to its recommendation, the residual impact of major is acceptable.

The EES assessment's proxy approach (which assumed every large tree was a hollow-bearing tree) is reasonable and appropriately conservative at this stage of the Project because:

- the alignment is approximately 30 kilometres long and the preferred option is not yet settled
- a tree-by-tree hollow survey would not change the EES impact rating as the proxy approach over states rather than under states the number of hollows affected
- DEECA did not request a hollow survey nor raise concerns about the assumption
- surveys will be undertaken prior to construction.

The Inquiry supports the Proponent's proposed changes to the mitigation measures, particularly seeking avoidance of hollow-bearing trees to minimise impacts.

Hollow rehabilitation may take significant time due to long establishment phase and the substantial number of hollows likely needed. This increases the importance of the artificial hollow program (FFM-M006) to secure acceptability of the impact.

FFM-M006 (Minimise disturbance, injury, or death of wildlife) involves preparing an artificial hollow program in consultation with DEECA, but does not specify requirements such as documentation of actual hollow losses, replacement ratios or reporting. This

detail should be included in the mitigation measure so the outcomes sought can be demonstrated.

The combination of mitigation measures, including the further avoidance required by FFM-M001 (Avoidance of impacts to ecological values during the design phase) and protection of retained trees under FFM-M005 (Prevent construction impacting on retained vegetation and habitat not approved for removal), and the offset obligation under Clause 6.12 of the Incorporated Document, provides an appropriate framework to manage impacts on hollow-bearing trees.

The major residual impact rating is acceptable because the proxy approach overstates rather than understates the number of hollows affected, further avoidance of hollow-bearing trees is required during detailed design, the artificial hollow program will provide replacement hollows while natural hollows form, and the loss will be offset in accordance with the Native Vegetation Guidelines. This is subject to refinement of the artificial hollow program as discussed below.

Fragmentation and habitat connectivity

The assessment of risks and impacts associated with habitat fragmentation is appropriate. A linear infrastructure project has the potential to fragment habitat and interrupt existing movement corridors. The impact will be moderated during construction by staged trenching, however the impact during operation will persist. The EES assessment of low residual risk from construction compared to medium for operations is accepted.

The Inquiry accepts Mr Lane's evidence that the remaining gaps at key corridors are unlikely to represent a significant barrier for mobile fauna. Groundcover and shrubs will offer some habitat connectivity despite the absence of deep-rooted trees. Opportunities for further minimisation of the width of canopy gaps should continue to be pursued during detailed design. The residual fragmentation and connectivity impacts are acceptable.

Woodside H28 Bushland Reserve is appropriately recognised for its significant ecological values and has been treated appropriately. The common alignment has been altered to minimise impacts and opportunities for trenchless crossing are expressly sought by FFM-M001 (Avoidance of impacts to ecological values during the design phase) and early rehabilitation of the Reserve is secured by FFM-M013 (Site reinstatement and rehabilitation). The residual risks and impacts are acceptable.

Waterways and riparian habitat

The Inquiry is satisfied with the assessment approach, the mitigated risks and accepts the residual impacts are acceptable.

The affected waterways are ephemeral and provide limited habitat in the Victorian works area. The issues raised by WGCMA were resolved during the Inquiry process, and the Inquiry supports the changes made to FFM-M003, FFM-M008 and FFM-M013 which strengthen the erosion, sedimentation and rehabilitation provisions, and endorses them as shown in the Inquiry recommended EMF (at Appendix E).

Groundwater dependent ecosystems

The groundwater drawdown is likely to be for a short duration and the assessment of GDE impacts is conservative. The EES appropriately concluded that significant impacts to GDEs and associated values are unlikely during temporary groundwater drawdown from onshore construction, and following implementation of FFM-M014 (Prepare and implement a Dewatering Plan) the residual risk to GDEs is low. The Inquiry is satisfied the mitigation measure is appropriate and impacts acceptable.

Cumulative impacts

The Victorian works will result in some unavoidable habitat loss and permanent breaks in treed vegetation, and these effects could be compounded by other development in the area. There is no evidence before the Inquiry that the scale of cumulative impacts is likely to materially affect habitat connectivity. The proposed avoidance, minimisation and rehabilitation measures provide an appropriate approach to manage the contribution of the Victorian works to cumulative impacts.

(v) Findings

The Inquiry finds, subject to its recommendations:

- habitat loss and degradation have been appropriately assessed
- the proposed mitigation measures are sufficient to avoid and minimise impact associated with habitat fragmentation and habitat connectivity, the loss of aquatic and riparian habitats and the potential loss of GDEs
- the removal of hollow-bearing trees is a major residual impact that has been appropriately assessed, and is acceptable subject to the recommended refinement of the artificial hollow program.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to require an artificial hollow program to be developed in consultation with the Department of Energy, Environment and Climate Action and which documents the actual hollow losses, specifies the replacement ratio and the artificial hollow type or types to be used, records the number and location of artificial hollows and provides for an audit on the program.

6.7 Onshore biosecurity

(i) The issues

The issues are whether the:

- EES has appropriately surveyed and assessed biosecurity threats (pest plants and animals, and pathogens)
- Project will contribute to the spread or introduction of terrestrial pest plants and animals, and pathogens

- Project adequately respond to the emerging threat of H5N1 avian influenza (bird flu).

Issues relating to marine biosecurity are addressed in Chapter 7.6 of this Report.

(ii) What did the EES say?

The Victorian works have the potential to introduce or spread weeds, pathogens and pest animals through construction and operation of the onshore transmission infrastructure. These threats have the potential to degrade native vegetation and fauna habitat and to initiate or exacerbate threatening processes under the FFG Act. The impact pathways are the movement of machinery, materials and personnel between infested and uninfested land, the transport of soil and spoil, the creation of disturbed ground and edges that favour weed establishment, and the movement of water and damp soil carrying pathogens.

Dedicated pest plant, pest animal and pathogen surveys were not completed as part of the onshore ecological assessment. Technical Report G states that weeds were incidentally documented during the vegetation and habitat assessments, and that other weed species may be present. Pest animals were also incidentally observed during the flora and fauna assessments.

Two pathogens listed as a threatening process under the FFG Act were considered in the risk assessment, specifically Chytrid fungus and Cinnamon fungus.

Incidental and targeted records documented:

- nine noxious weeds declared under the *Catchment and Land Protection Act* 1994, four of which are weeds of national significance
- six pest animal species listed under the *Catchment and Land Protection Act 1994*
- no pest fish and no species listed as noxious aquatic species under the *Fisheries Act* 1995
- two pathogens listed as threatening processes under the FFG Act were included in the risk assessment.

Technical Report G states "*it is unknown whether chytrid fungus is present in or adjacent to the project area and that all water and damp soil should be assumed infected unless testing shows otherwise*". Chytrid fungus is a recorded threat to both the Southern Toadlet and Martin's Toadlet. Cinnamon fungus is known to be present in the general area (was recorded in the Merrimans Creek Flora and Fauna Reserve which is not in the Project area). Susceptible understorey families occur in Heathy Woodland (EVC 48), Damp Sands Herb-rich Woodland (EVC 3) and Lowland Forest (EVC 16).

FFM-M007 (Control spread and/or introduction of weeds, pathogens and/or pest animals) requires a Biosecurity Management Plan that includes performance targets and contingency measures, machinery and material hygiene requirements, protocols for weeds and pathogens pre-construction weed mapping, monitoring and management of weed outbreaks, and measures to avoid encouraging pest animals. AGM-M005 (Biosecurity management plan) applies the same controls to agricultural land. It cross

references FFM-M007 and was amended in the Final Day EMF to add monitoring, auditing and enforcement requirements.

Following implementation of the Biosecurity Management Plan the residual construction risk from the introduction or spread of weeds, pathogens and pest animals was assessed in the EES as medium, localised and long-term.

The EES concludes the residual biosecurity risk is medium during construction and low during operation. It assessed the risk of weeds, pathogens and pest animals during operation as low following implementation of the OEMP. It identified a medium residual risk of weeds or pathogens being introduced or spread into areas of ecological sensitivity. It concludes that the Victorian works are unlikely to increase pest animal populations above existing levels and that impacts from weeds and pathogens should be manageable to acceptable levels through the Biosecurity Management Plan and the CEMP.

(iii) Evidence and submissions

Submitters raised issues relating to:

- the requirement for appropriate consultation with affected parties including Wellington Council, public land managers and landowners
- more specific controls regarding rehabilitation planning, monitoring and auditing
- potential spread of bird flu.

A summary of key submissions, evidence and associated responses from the Proponent is presented in Table 13.

Table 13 Summary of key submissions, evidence and Proponent responses

Submissions	Evidence	Proponent's response
Wellington Council was concerned the Biosecurity Management Plan did not provide sufficiently detailed pre-construction identification and management of risks. It submitted the Biosecurity Management Plan should include pre-construction surveys and risk assessment of pest plants, animals and pathogens, and a cross-tenure risk based targeted control program before construction. It sought for post-construction monitoring to be timed with high-risk weed life cycles rather than being annual. It requested to be consulted on the Rehabilitation and Reinstatement Plan, particularly in relation to revegetation within Council-managed roadsides.	Mr Lane's response was limited to Wellington Council's requests to be consulted on the Biosecurity Management Plan and the Rehabilitation and Reinstatement Plan, both of which he supported (Document 41).	The Proponent accepted most of Council's requests, amending AGM-M005 (Biosecurity management plan) and FFM-M007 (Control spread and/or introduction of weeds, pathogens and/or pest animals) to strengthen pre-construction pest mapping and biosecurity risk assessment. It said existing requirements for pre-construction mapping and treatment already addressed Wellington Council's request for targeted pre-construction control. The Proponent: - agreed and amended FFM-M013 (Site reinstatement and rehabilitation) to align monitoring with high risk weed life cycles - added Wellington Council to the Rehabilitation and Reinstatement Plan consultation list.
DEECA submitted biosecurity management plans should be developed with affected landholders and supported by clear requirements for monitoring, auditing and enforcement. Wellington Council made similar submissions about consultation with affected landowners.	No expert commented on these submissions.	The Proponent said biosecurity procedures would be developed in consultation with landowners, with property-specific requirements in Property Management Plans, and amended AGM-M005 (Biosecurity management plan) to include monitoring, auditing and enforcement requirements.

Bernadette Gray submitted the Project should be postponed or halted until bird flu is managed and contained. She raised concerns that bird flu presents a biosecurity risk, including the potential for construction activity and movement between agricultural land and bird habitat to facilitate transmissions. The submitter sought specific prevention, surveillance and response protocols.	Mr Lane considered the existing mitigations satisfactory for managing all pathogen risks. He said the greatest transmission risk relates to seabirds and waterbirds and that no large wetlands supporting large numbers of those birds existed near the Victorian works area. Dr Greenwell advised the Reeves Beach shore crossing location was selected in part because of its low bird numbers and diversity.	The Proponent said the identified H5 transmission pathways are not credibly linked to the Victorian works, but accepted that bird flu was an environmental risk requiring management during construction. It proposed to amend FFM-M007 (Control spread and/or introduction of weeds, pathogens and/or pest animals) to require specific measures developed with relevant authorities to reduce bird flu risks.

(iv) Inquiry assessment

The biosecurity threats and risks have been adequately assessed. The proposed approach appropriately minimises and manages impacts, including in relation to bird flu. With the changes that Wellington Council requested, the residual risks are acceptable.

Neither DEECA nor Wellington Council raised concern about the approach to assessing biosecurity risks. Their submissions were directed to the content of, and consultation on, the Biosecurity Management Plan. This provides assurance that the pathways have been adequately identified and assessed.

The Project is unlikely to increase pest animal population above existing levels. Risks from weeds and pathogens can be managed to acceptable levels through the Biosecurity Management Plan and CEMP. The changes requested by Wellington Council and accepted by the Proponent are reasonable and appropriate, and are supported. The medium residual risk rating is supported.

The Inquiry supports the Proponent's proposed changes including in the Final Day EMF including:

- addition of a dispersal risk assessment and pest mapping (FFM-M007)
- linking rehabilitation monitoring frequency to high risk weed life cycles (FFM-M013)
- adding monitoring, auditing and enforcement requirements (AGM-M005)
- adding Wellington Council, agricultural specialists, affected landowners and Agriculture Victoria as consultation parties.

Bird flu emerged as a new threat to the Victorian environment after the EES was prepared. While the risks identified by submitters are not necessarily attributable to the Victorian works, there is a valid need to manage the potential for biosecurity risks to change over the construction period.

The Inquiry agrees with Mr Lane the Biosecurity Management Plan will provide sufficient mitigation. AGM-M005 (Biosecurity management plan) in the Proponent's Final Day EMF provides a framework to manage all weeds, pest animals and pathogens (which

inherently includes bird flu). Consultation on the plan across all levels of government will ensure any emerging protocol and procedures can be considered.

(v) Findings

The Inquiry finds the:

- EES appropriately identified and assessed biosecurity threats
- mitigation measures appropriately minimise and manage the potential for the Victorian works to contribute to the spread or introduction of terrestrial pest plants or animals, or pathogens
- mitigation measures provide an appropriate framework for responding to the emerging threat of bird flu.

6.8 Clause 43 matters

The Inquiry considers the following matters are appropriately dealt with under Clause 43 of the Terms of Reference and do not warrant detailed assessment.

Table 14 Matters excluded from detailed assessment

Issue	Inquiry determination and comments
Common fauna (except koala)	The EES assessed injury or mortality of common and non-threatened fauna during habitat removal, entrapment in open trenches and excavations, collision with construction and maintenance vehicles, and disturbance or displacement of fauna occupying retained habitat adjacent to the works. It identified a negligible residual impact for fauna injury and mortality during construction, and a low residual risk for fauna mortality from vehicle movements during operation and decommissioning, having regard to the small area disturbed at any one location, the mobility of the species involved and the extent of equivalent habitat in the surrounding landscape. The impact would be managed through FFM-M006 (Minimise disturbance, injury, or death of wildlife), which provides for pre-clearing survey by suitably qualified wildlife specialists, trench management including exit ramps and daily inspection, fauna exclusion measures and signage, and salvage and translocation where practicable by a handler holding a current authorisation under the *Wildlife Act 1975*, supported by contractor induction and training under FFM-M004. The Inquiry has recommended changes to FFM-M006 to further avoid and minimise impacts to koala. These changes will also reduce risks for other fauna (see Chapter 6.5). The Inquiry has discussed culturally significant species in Chapter 9. The Inquiry considers the impact pathway is conventional and that the proposed controls are generally consistent with established environmental management practice, including relevant regulatory requirements or recognised industry guidance.
Downstream effects on the Corner Inlet Ramsar Site	The EES assessed the risk of downstream effects on the Corner Inlet Ramsar Site arising from the temporary causeway proposed over unnamed waterway UFI 42824679 in the shore crossing area, and from temporary groundwater drawdown at the transition joint bays. It identified a low residual risk, having regard to the selection of a shore crossing point that avoids the Ramsar site,

Issue	Inquiry determination and comments
	the distance downstream, and the temporary nature of the works. The risk would be managed through FFM-M010 (Manage impacts on waterways), which provides for a Designated Waterway Crossing Management Plan setting site-specific measures to retain the waterway's hydrology and flow regime and to maintain bank stability, and through FFM-M014 (Prepare and implement a Dewatering Plan), which requires baseline groundwater and surface water monitoring in the shore crossing area following micro-siting of the transition joint bays. The Inquiry considers the impact pathway is conventional and that the proposed controls are generally consistent with established environmental management practice, including relevant regulatory requirements or recognised industry guidance.

7 Victorian marine environment and marine protected areas

7.1 Background

The following EES Chapters and technical reports are relevant to Victorian marine environment and marine protected areas:

- Chapter 23 (Victorian Marine Environment)
- Chapter 24 (Victorian Marine Protected Areas)
- Technical Report A (Coastal Processes and Sediment Transport)
- Technical Report B (Benthic Ecology)
- Technical Report C (Fish and Invertebrates)
- Technical Report D (Marine Mammals and Turtles)
- Technical Report E (Offshore Ornithology and Bats)
- Technical Report F (Marine Protected Areas).

Table 15 shows the relevant Evaluation Objectives.

Table 15 Evaluation objective – Victorian marine environment and marine protected areas

Impact/effect	Evaluation objective
Biodiversity and habitat	To avoid, and where avoidance is not possible, minimise, potential adverse effects on protected native vegetation and listed threatened species and their habitat and listed ecological communities, in both onshore and offshore environments, as well as address offset requirements consistent with state policies.
Water and catchment values	To minimise adverse effects on water (including groundwater, waterway, wetland, estuarine, intertidal and marine) quality and movement.

Table 16 shows the relevant legislation, policy and guidelines.

Table 16 Relevant legislation, policy and guidelines – Marine environment and marine protected areas

Legislation	Policy/guidelines
- Biosecurity Act 2015 (Cth) - Crown Land (Reserves) Act 1978 - EP Act - Environment Protection Regulations 2021 - Fisheries Act 1995 - FFG Act - MAC Act - National Parks Act 1975 - Pollution of Waters by Oils and Noxious Substances Act 1986 - Pollution of Waters by Oil and Noxious Substances Regulations 2022 - Wildlife Act 1975 - Wildlife (Marine Mammals) Regulations 2019	- Ramsar convention on wetlands - *West Gippsland Waterway Strategy 2014-2022* (WGCMA, 2014), including Corner Inlet Ramsar Site Management Plan - National Light Pollution Guidelines for Wildlife (DCCEEW, 2023)

Expert evidence was given by the following experts on behalf of the Proponent:

- Mr Kim Stewart (benthic ecology and marine protected areas)
- Dr Claire Greenwell (seabirds)
- Dr Janelle Eagle (marine mammals and turtles)
- Craig McPherson (underwater acoustics)
- Dr Mike Mackie (fish and invertebrates) (provided an expert statement but did not appear at the submitter conference).

7.2 Benthic ecology

(i) The issues

The issues are whether:

- the impacts of the Project on benthic ecology have been appropriately assessed
- mitigation measures are appropriate and residual impacts on benthic ecology are acceptable.

Related issues are addressed in other chapters of this Report including

- marine biosecurity (see Chapter 7.6)
- oil spill (see Chapter 7.7).

(ii) What did the EES say?

The EES assessed potential impacts on benthic habitats and communities within the approximately 86 square kilometre offshore export cable area in Victorian waters.

The Victorian works have the potential to affect benthic habitats and communities through seabed disturbance, sediment deposition and changes to water quality during construction, and through the presence of infrastructure and vessel activities during operation.

The EES used desktop information, field surveys undertaken during summer and winter between 2021 and 2023 and sediment dispersion modelling. The Marine Ecology Survey Program described in Technical Report B included drop-camera underwater video and grab surveys for infauna, sediment and contaminants.

Three habitat types occur within the offshore export cable area in Victorian waters:

- soft sediment (approximately 92 percent of the area)
- rocky reef (approximately 7 percent of the area)
- seagrass *Heterozostera tasmanica* at 18 to 25 metres depth (approximately 1 percent of the area).

Soft sediment is rated lower sensitivity, while rocky reef, and soft sediment with seagrass, are rated medium sensitivity.

The EES assessed four receptor groups:

- FFG Act-listed species
- soft sediment seagrass habitat
- rocky reef habitat
- soft sediment habitat.

Table 17 shows the impacts assessed, the proposed mitigation measure and residual ratings ranges for the receptor groups. Following implementation of the mitigation measures the residual impacts are rated negligible to minor.

The EES concluded there were no impact pathways that would have potentially significant impacts on benthic ecology receptors.

Table 17 Summary of impacts, mitigations and residual impact rating for benthic ecology

Impacts assessed	Mitigation measure	Residual impact rating
- BEC-I01 (Seabed disturbance, construction) - BEC-I02 (Changes to water quality, construction) - BEC-I04 (Permanent loss of benthic habitat, operation) - BEC-I05 (Physical presence of artificial substrate, operation and decommissioning) - BEC-I06 (Changes to water quality from vessel discharge, operation) - BEC-I07 (Disturbance to seabed from vessel anchoring, operation)	- BHC-M01 (Pre-construction geophysical survey – avoidance of high-profile reef) - BHC-M02 (Pre-construction seagrass distribution survey) - EMI-M01 (Depth of cable burial) - MEMP-M06 (Monitoring of benthic habitats) - MEMP-M09 (Cable burial survey and monitoring)	- BEC-I01 Negligible to Minor. Maximum construction seabed disturbance 1.93 percent of the offshore export cable area - BEC-I02 Negligible to Minor. Modelled deposition 0.8 millimetres across 28.9 square kilometres; plumes about 5.1 square kilometres - BEC-I04 Negligible to Minor. Maximum permanent habitat loss 0.07 square kilometres, being 0.03 percent of the area - BEC-I05 Negligible to Minor. Maximum artificial substrate footprint 0.04 square kilometres - BEC-I06 Negligible to Minor - BEC-I07 Negligible to Minor

(iii) Evidence and submissions

Submitters raised concerns relating to:

- adequacy of the assessment
- construction related impacts, including impacts to the most sensitive receptors (high profile reef and seagrass).

DEECA was not satisfied that impacts to the benthic environment had been adequately assessed. It recommended additional mitigation measures of:

- identification and avoidance of the seabed and sensitive marine benthic environments prior to disturbance
- avoidance of seagrass beds
- a FFG Act permit if seagrass is proposed to be removed.

Following review of the Proponent's Version 3 EMF (which are reflected in the Final Day EMF), DEECA advised it was satisfied with the Proponent's proposed changes to the EMF, noting:

> DEECA will have an opportunity to review the detailed response to address the new measure at the FFG permit application stage (if required).

The National Trust of Australia (Victoria) submitted that all seagrass should be avoided.

Seafood Industry Victoria Inc. (SIV) sought greater certainty on reef avoidance and sought pre-approval certainty and not relying on future design refinement. Other submitters raised similar concerns.

Several submitters raised concerns about seabed disturbance and questioned whether impacts would necessarily remain localised and short term. Specific issues related to:

- the impacts of trenching, drilling and cable installation with the potential to damage benthic habitats, alter sediment movement, increase turbidity and affect species that depend on these environments for feeding, breeding and migration
- lack of evidence demonstrating sediment transport and benthic habitat changes will remain localised over the life of the Project.

Mr Stewart adopted Technical Reports B and F to the extent they relate to Victorian works. In response to DEECA's original submission, he advised he was satisfied the features described in the Technical Report B (specifically Woodside Patch Reefs, Woodside Ocean Beaches and Woodside Offshore Sediment Beds) are consistent with the descriptions in *Victoria's Framework for Identifying Marine Key Ecological Features* (DEECA 2025), while noting that some habitat descriptors differ. Accordingly, he did not support including DEECA's broader definitions to identify and avoid other benthic features.

Mr Stewart explained that much of the seagrass:

- observed during the field survey was very sparse and unlikely to provide the same ecological benefits of extensive, dense seagrass beds
- is likely not permanent and subject to regular disturbance due to sediment mobility, weather events and wave/current energy.

As potential impacts were assessed as negligible to minor, and risks low, Mr Stewart said there is no compelling reason to require avoidance of seagrass as a proportionate response to the potential impact. He did not however oppose a seagrass mapping measure to define the location and extent of seagrass beds, either as a new measure or modification to existing BHC-M01.

On cumulative impacts, Mr Stewart said no adverse effects to ecological function and integrity of any benthic ecology receptors are expected as a result of the cumulative impacts of the Overall Project and other projects. Mr Stewart advised that if Australian

Grass-wrack *Heterozostera nigricaulis* is identified, as protected flora an FFG permit would be required.

The Proponent adopted Mr Stewart's evidence. It said that because impacts were assessed based on the Overall Project, the assessments when applied to the Victorian works alone are conservative, and the residual risk ratings for high profile reef and seagrass habitats are minor and negligible, respectively, driven by the localised and short-term nature of seabed disturbance to these habitat types.

The Proponent's Final Day EMF adopted Mr Stewart's response to reef avoidance, and submitted that BHC-M01 and the proposed new seagrass measure (BHC-M02) which will require updated survey and mapping prior to construction, with avoidance measures based on the final cable routes.

(iv) Inquiry assessment

The benthic ecology and habitat impacts have been appropriately assessed. With the changes made to in response to DEECA, the mitigation measures are appropriate. The residual impacts are acceptable.

The benthic survey approaches are appropriate, as are the benthic habitat descriptions used within the EES. Drop-camera and sediment grab surveys across two seasons between 2021 and 2023 describe the habitat types present and the communities they support. While DEECA's benthic descriptors were defined after the baseline studies were completed, the Inquiry accepts Mr Stewart's evidence that these are not materially different.

The two most sensitive receptors in the benthic environment are high profile reef and seagrass. The full extent of high-profile reef is not resolved in the exhibited material. Appropriately BHC-M01 (Pre-construction geophysical survey – avoidance of high profile reef) requires that to be appropriately addressed pre-construction, before final siting of infrastructure.

The Victorian works area is a high energy environment that lends itself to more ephemeral seagrass cover, dynamic in nature that will recede and recover in response to both natural factors and anthropogenic factors such as cable trenching. Complete avoidance of all seagrass is not a proportionate response given negligible to minor assessed impacts. However, seagrass is widely recognised as an important marine habitat feature and accordingly the Inquiry supports the new mitigation measure BHC-M02 (Pre-construction seagrass distribution survey). This mitigating measure will ensure seagrass is mapped before construction, enabling application of the mitigation hierarchy and informing the need for an FFG permit application.

The Inquiry accepts the residual impacts ratings on benthic habitats and communities are negligible to minor. The residual impacts acceptable, because the maximum temporary seabed disturbance is 1.93 percent of the offshore export cable area, the maximum permanent habitat loss is 0.03 percent of it. The two most sensitive receptors are subject to pre-construction survey and avoidance, and the ratings are derived from the Overall Project and are therefore conservative for the Victorian works. The Inquiry

supports the Proponent's changes to the EMF, including new measure BHC-M02 (Pre-construction seagrass distribution survey).

The Inquiry accepts the conclusions relating to cumulative impacts. The benthic habitats affected by the Victorian works are largely widespread and the physical disturbance associated with cable installation is localised and largely temporary. The Victorian works are unlikely to make a significant contribution to cumulative loss or disturbance of benthic habitat.

(v) Findings

The Inquiry finds:

- the assessment of the benthic environment is adequate and accurately describes the existing conditions
- mitigation measures are appropriate and residual impacts are acceptable.

7.3 Marine protected areas

(i) The issue

The issues are whether:

- the impacts on marine protected areas (MPA), including Corner Inlet Ramsar Site, have been appropriately assessed
- mitigation measures are appropriate and residual impacts are acceptable.

The following issues relating to MPA are addressed in other chapters of this Report:

- underwater noise (see Chapter 7.4)
- vessel strike, propeller injury and entanglement (see Chapter 7.5)
- invasive marine species (see Chapter 7.6)
- accidental oil spills (see Chapter 7.7)
- vessel light emissions (see Chapter 7.5)
- surface water (see Chapter 12.2).

(ii) What did the EES say?

The EES assessed potential impacts and risks to MPAs in the Gippsland region, including the Corner Inlet Ramsar site, marine national parks, marine and coastal parks and coastal reserves, from vessel transits, shore crossing and offshore export cable works. The Victorian works have the potential to affect the environmental values of MPA through construction, operation and decommissioning activities.

While no construction activities are proposed within Victorian MPA, vessels would transit through or adjacent to some protected areas. Eight MPA are relevant to the assessment including Corner Inlet Ramsar site, Corner Inlet Marine National Park and Marine and Coastal Park, McLoughlins Beach–Seaspray Coastal Reserve, Ninety Mile Beach Marine National Park, Nooramunga Marine and Coastal Park, and Wilsons Promontory Marine National Park and Marine Reserve (see Figure 8). Project vessels may transit through or adjacent to some MPA, including the Corner Inlet Ramsar site, in travelling to and from port facilities. Port Anthony and Barry Beach Marine Terminal both occur within the Corner Inlet Ramsar site boundary and are expected to be used for construction

management and throughout operation. Technical Report F states up to 7,820 support vessel round trips from Corner Inlet during the construction period of four years and 11 months, and up to 1,202 round trips per year during the 30-year operations period.

The EES identified the environmental and other values of each MPA from relevant management plans and other sources. Relevant impacts principally include underwater noise, physical disturbance and artificial light from vessels. Risks assessed include the introduction of invasive marine species, accidental hydrocarbon spills from vessels and contaminated surface water from the shore crossing entering Corner Inlet. Where there was no plausible impact pathway, the value was not assessed further.

Vessel movement is a key activity that drives direct impact and risk pathways. For example, impacts from vessels transiting through or adjacent to Corner Inlet Marine National Park and Marine and Coastal Park comprise underwater noise, physical disturbance and artificial light, while relevant risks include invasive marine species, accidental hydrocarbon spills and contaminated surface water from the shore crossing.

The EMF includes measures to manage the indirect effects on MPA, including those associated with vessel movements, invasive marine species, spills and contaminated surface water. Residual risks to Victorian MPA are assessed as low or very low, with no significant residual impacts on MPA predicted after mitigation.

The EES concluded that, while vessel-related light, noise and disturbance could contribute to minor cumulative effects for some bird and fish values, mitigation measures would ensure no significant cumulative impacts on MPA ecological values.

Project vessels may transit through or adjacent to some MPA, including the Corner Inlet Ramsar site, in travelling to and from port facilities. Port Anthony and Barry Beach Marine Terminal both occur within the Corner Inlet Ramsar site boundary and are expected to be used for construction management and throughout operation. Technical Report F states up to 7,820 support vessel round trips from Corner Inlet during the construction period of four years and 11 months, and up to 1,202 round trips per year during the 30-year operations period.

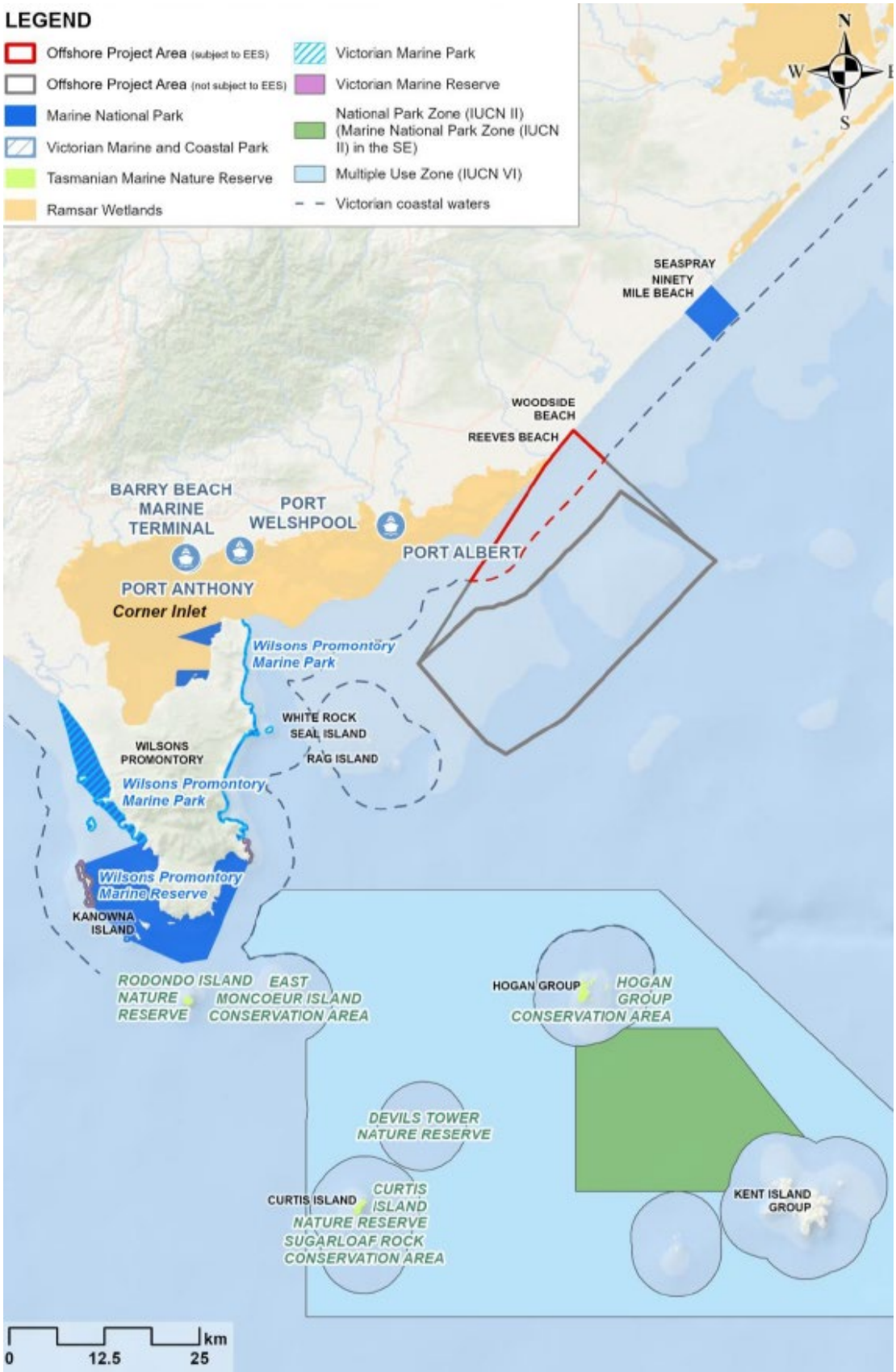
The EES identified the environmental and other values of each MPA from relevant management plans and other sources. Relevant impacts principally include underwater noise, physical disturbance and artificial light from vessels. Risks assessed include the introduction of invasive marine species, accidental hydrocarbon spills from vessels and contaminated surface water from the shore crossing entering Corner Inlet. Where there was no plausible impact pathway, the value was not assessed further.

Vessel movement is a key activity that drives direct impact and risk pathways. For example, impacts from vessels transiting through or adjacent to Corner Inlet Marine National Park and Marine and Coastal Park comprise underwater noise, physical disturbance and artificial light, while relevant risks include invasive marine species, accidental hydrocarbon spills and contaminated surface water from the shore crossing.

The EMF includes measures to manage the indirect effects on MPA, including those associated with vessel movements, invasive marine species, spills and contaminated surface water. Residual risks to Victorian MPA are assessed as low or very low, with no significant residual impacts on MPA predicted after mitigation.

The EES concluded that, while vessel-related light, noise and disturbance could contribute to minor cumulative effects for some bird and fish values, mitigation measures would ensure no significant cumulative impacts on MPA ecological values.

Figure 8 Marine protected areas in relation to the Project area



Source: EES Chapter 24

(iii) Evidence and submissions

Some submitters raised concerns regarding impacts on MPA including:

- potential cumulative impacts including for Wilsons Promontory, Corner Inlet, Nooramunga, Ninety Mile Beach, Barry Beach, Port Anthony and Hastings
- construction feeder ports and increased vessel movements
- underwater noise, fauna disturbance, accidental hydrocarbon spill, light emissions, invasive marine species, and questions about the limit to acceptable change.

In its consultation submission DEECA requested the EMF be updated to:

- ensure no works or movement is to occur within one kilometre of Ninety Mile Beach Marine National Park (or other Marine Parks)
- establish appropriate controls to mitigate any indirect impacts from works occurring within three kilometres of Ninety Mile Beach Marine National Park.

DEECA did not raise this issue in comments on the Proponent's Version 3 EMF.

Mr Stewart gave evidence:

> There will be no offshore construction in marine protected areas. Vessels associated with construction, operations and decommissioning may transit through some marine protected areas, including Corner Inlet Marine National Park, Corner Inlet Marine and Coastal Park and Nooramunga Marine and Coastal Park in Victoria.
>
> …
>
> No works are proposed within 3 km of Ninety Mile Beach Marine National Park.
>
> Works on the offshore export cable within the offshore export cable area could occur within 1 km of Nooramunga Marine and Coastal Park. However, there is a land barrier between the area where the works would be occurring and marine habitat for fish and invertebrates within the Marine and Coastal Park.

He considered additional measures were not necessary.

Other experts provided the following evidence:

- Mr Provis confirmed that in his opinion there is no risk for MPA.
- Dr Eagle confirmed the EES accurately reflected the impacts and risks on marine mammals and turtles as values of the MPA.
- Dr Greenwell confirmed the EES accurately reflected the impacts and risks in relation to offshore ornithology and bats, including within MPAs.

The Proponent submitted:

- no Victorian works will directly occur in any MPA including the Ninety Mile Beach Marine National Park which is over 20 kilometres from the Project area
- indirect impact pathways are addressed by existing mitigation measures that will minimise impacts to Victorian marine parks
- the cumulative assessment was based on publicly available information as at August 2025 and significant cumulative impacts are not predicted.

(iv) Inquiry assessment

The EES includes a robust description and evaluation of risk pathways. The Inquiry is satisfied that pathways are indirect and there will be no significant impact on MPA and the residual impacts are acceptable.

No Victorian works are proposed within any MPA. The principal impact pathway is vessel transit, with Project vessels transiting through the Corner Inlet Ramsar site and adjacent to Corner Inlet Marine National Park, Corner Inlet Marine and Coastal Park and Nooramunga Marine and Coastal Park.. Works on the offshore export cable could occur within one kilometre of the Nooramunga Marine and Coastal Park, although Mr Stewart's evidence is that a land barrier separates the works area from marine habitat within that park. No works are proposed within three kilometres of the Ninety Mile Beach Marine National Park, which Technical Report F places approximately 26 kilometres north of the offshore project area.

Residual risks to Victorian MPA are assessed as low or very low. No Victorian works occur within any MPA and the only impact pathway is vessel transit on prescribed routes through waters already carrying commercial shipping (which is an indirect impact). In addition, each indirect pathway is appropriately addressed by mitigation measures in the Final Day EMF. No submitter or expert sought a change to the measures relied on for MPA and DEECA's concerns were adequately addressed.

(v) Findings

The Inquiry finds:

- the impacts on MPA, including the Corner Inlet Ramsar site, have been appropriately assessed
- mitigation measures are appropriate and residual impacts are acceptable.

7.4 Underwater noise

(i) The issues

The issues are whether:

- noise modelling relating to marine fauna is adequate
- impacts on marine fauna can be appropriately avoided, minimised and managed
- residual risks to marine fauna are acceptable.

(ii) What did the EES say?

The EES assessed the impacts of underwater noise within the offshore export cable area and vessel transit routes to Victorian ports, including noise generated by dynamic positioning vessels[6] and other Project vessels during construction and operation.

Underwater noise modelling relevant to the Victorian works considered vessel noise within shallow waters. It considered the predicted noise exposure against relevant thresholds for different marine fauna receptor groups and the likelihood and duration of animals being present within the predicted zones of effect. The vessel noise scenario modelled assumed a worst-case scenario with all scenarios modelled together including:

- wind turbine generator installation vessel stationary under dynamic positioning

[6] Dynamic positioning vessels use thrusters to maintain their position in the water column, generating continuous low-frequency underwater noise.

- platform support vessel holding position using dynamic positioning
- single cable lay vessel moving along a cable lay path using dynamic positioning during cable laying operations.

Underwater noise has the potential to affect marine fauna that are sensitive to sound, including marine mammals, fish and diving seabirds. Potential effects include behavioural disturbance or displacement and, at sufficiently high exposure levels, temporary or permanent hearing impairment.

The EES includes details of receptor sensitivity, impacts and response distances of marine fauna.

'Injury' from noise is treated differently for different marine fauna groups. Whales, dolphins and seals are the most sensitive group. The assessment considered baleen whales (*mysticetes*) including the low frequency hearing species such as the Pygmy Blue Whale, the Humpback Whale and the Southern Right Whale, and toothed whales, and dolphins (*odontocetes*) and seals (*pinnipeds*). The Blue Whale Conservation Management Plan (a recovery plan under the EPBC Act) defines injury to Blue Whales as both permanent and temporary hearing impairment. Given the Southern Right Whale also has a recovery plan under the EPBC Act, with action areas the same as those in the Blue Whale Conservation Management Plan, the EES assumed hearing impairment was considered injury for Southern Right Whales as well.

For fish, sensitivity varies between receptor groups according to hearing physiology and the presence of swim bladders. Diving seabirds, particularly Little Penguins and cormorants, were also assessed because of the time they spend underwater.

Table 18 shows the fauna group, mitigation measures and residual impact ratings (from negligible to minor). Principal mitigation measures for marine fauna and underwater noise include:

- continuous observations by Marine Fauna Observers for marine mammals
- species-specific precaution zones and reduction of dynamic positioning thruster use where relevant animals are detected within those zones
- timing controls to avoid (where practicable) the most sensitive periods for marine mammals.

The EES concluded that underwater noise from the Victorian works will not result in significant impacts on marine fauna.

Table 18 Underwater noise impacts and mitigations proposed within the EES

Impacts assessed	Mitigation measure	Residual rating
Marine mammals and turtles		
- MMT-I001 (Underwater noise emissions, construction) - MMT-I001 (Underwater noise	- UWN-M03 (Noise abatement system) - UWN-M06 (Marine Fauna Observers) - UWN-M07 (Passive acoustic monitoring)	- Minor for Pygmy Blue Whale, Southern Right Whale, Humpback Whale and other mysticetes (High sensitivity) - Negligible for *odontocete dolphins, pinnipeds* and

Impacts assessed	Mitigation measure	Residual rating
emissions, operation)	- UWN-M08 (Pre start-up marine mammal surveillance) - UWN-M09 (Start-up delay procedure) - UWN-M10 (Operations procedure) - UWN-M11 (Stop work procedure) - UWN-M12 (Night-time monitoring) - UWN-M15 (Installation of export cable within Southern Right Whale biologically important area) - UWN-M16 (Vessel underwater noise management)	marine turtles (Low sensitivity)
Fish and invertebrates[7]		
- FIV-I001 (Underwater noise emissions – construction) - FIV-I001 (Underwater noise – operation)	- UWN-M03 (Noise abatement system) - VES-M01 (Vessel operations framework)	- Minor for White Shark and syngnathids, (High sensitivity) - Negligible for the other receptor groups
Diving seabirds		
- OOB-I010, OOB-I011 and OOB-I012 (Underwater noise: change in fauna behaviour, TTS and PTS [construction]) - OOB-I010 and OOB-I011 (Underwater noise – operation)	- VES-M04 (Vessel movement controls)	- Negligible for Little Penguin (Medium sensitivity), Cormorants, shearwaters, Australasian Gannet and petrels. - Minor for Little Penguin and Short-tailed Shearwater during operations and Negligible for Black-faced Cormorant and Little Pied Cormorant.

[7] *The EES stated: Crustacean, benthic invertebrate and human diver noise effect thresholds not modelled as there are no regulatory continuous noise thresholds for these receptors*

The EES identified potential cumulative underwater noise impacts from the Victorian works and other major projects. For marine mammals, the cumulative assessment was predominantly concerned with pile driving and other noise-generating activities occurring in Commonwealth waters. Within the Victorian works are, cumulative impacts on Little Penguin were expected principally from transiting vessels and were assessed as temporary and negligible.

(iii) Evidence and submissions

Many submitters raised concerns about underwater noise and the assessment methodology (some submissions focussed on activities associated with the Commonwealth works which are not relevant to the Inquiry). Submitters were concerned about:

- impacts on whales and fish, including behavioural responses and displacement
- impacts on the feeding, migration and reproduction of whales and dolphins
- the adequacy of the proposed monitoring programs
- the effectiveness of mitigation measures that rest on predictions and future commitments, including modelling, adaptive management frameworks and plans to be prepared after approval.

DEECA noted that Technical Report D "*introduces significant underwater noise modelling, including animal (movement-based) modelling and revised exposure thresholds aligned with current international guidance*". It submitted the low residual impact rating "*is highly dependent on the assumed effectiveness and implementation of mitigation measures … which has been used in other parts of the world but will be a first in Victoria and any jurisdiction in Australia*" and recommended a dedicated Marine Fauna Observer be required (UWN-M06).

The Dolphin Research Institute supported the rigorous assessment approach and considered the EES was overcautious in its estimate of the number of cetacean species. It was concerned that the construction noise could displace migrating whales into areas of increased predation risk, and considered monitoring important to understand actual whale responses to underwater noise.

SIV and Wildlife Coast Cruises Pty Ltd were concerned fish and mammals would be displaced due to underwater noise and considered there was uncertainty relating to the significance of cumulative underwater noise impacts.

Submitters raised broader concerns about cumulative underwater noise from increased vessel traffic and multiple offshore wind projects.

Experts generally agreed with the EES assessment and noted:

- the noise modelling and the assessment of impacts on marine fauna are robust and appropriately conservative, with ratings derived from the Overall Project rather than the Victorian works alone (Dr Mackie and Mr Stewart)
- noise from the Victorian works is not expected to have long lasting impacts on the migration patterns of any species, on feeding in Blue Whales or Humpback Whales, or on communication or reproduction in Southern Right Whales,

because the cable lay period is short (months, not years) and mitigation measures are in place to avoid disturbance and injury to whales (Dr Eagle)
- population level effects on syngnathids are not expected. Although syngnathids carry a high sensitivity rating and occupy a wide range of habitats, the reef and seagrass habitat they prefer is of limited extent within the Victorian works area and is subject to avoidance measures (Dr Mackie).

In response to concern raised by DEECA and the Dolphin Research Institute regarding Marine Fauna Observers, Dr Eagle recommended a new mitigation measure UWN-M16 (Vessel Underwater Noise Management) to:

- apply the EPBC Act Policy Statement 2.1 as appropriate
- clarify the intention to use dedicated Marine Fauna Observers during the winter season when whales are more abundant, which also reduces the risk of vessel strike.

Dr McPherson recommended an amendment to UWN-M15 (Installation of export cable within Southern Right Whale biologically important area) so that:

- dynamic positioning is not powered up until at least 30 minutes has elapsed from the most recent sighting of a Southern Right Whale
- the measure encompasses a 30 minute pre-start observation period.

The Proponent explained the construction timeframe would be short, with the (up to) eight cables taking about one week each to be installed in Victorian waters, with cable pull-in to onshore requiring the ship to be on station above the shore crossing duct for about a day per cable.

It submitted the EES had been informed by thorough expert analysis, applying contemporary practice and best available science. It said:

- the EES identifies and analyses all credible impact and risk pathways for the Victorian works, and the assessment of impacts and risks is robust and appropriately conservative
- in response to submissions, evidence and engagement with key regulators mitigation measures in the Final Day EMF require dedicated Marine Fauna Observers, include a new underwater noise measure and changes to the start-up procedures for dynamic positioning.

(iv) Inquiry assessment

The underwater noise assessment is based on a substantial body of work to understand baseline marine conditions within the Victorian works area. This work has been supported by the marine scientists with expertise of various biological groups or technical disciplines including underwater noise expertise.

The underwater noise model provides a conservative representation of the extent of noise impact. The underwater noise modelling is based on a worst-case scenario assuming multiple vessels are operating and simultaneously using dynamic positioning thrusters at maximum power over a 24 hour period. Dynamic positing thrusters would not be continually operating and would not be at maximum power when they are used.

Further, the period of exposure is short (no more than eight weeks spaced across a 19-month period).

The most sensitive species include White Sharks and syngnathids (fish), Little Penguin and other diving birds such as gannets and cormorants (birds) and the Pygmy Blue Whale, Southern Right Whale, Humpback Whale (Baleen Whales). Whilst there is some uncertainty, for example the lack of behavioural response threshold for penguins or diving seabirds, all of the sensitive species are highly mobile with the ability to move away from the zone of impact (with the exception of syngnathids which Dr Mackie described as having limited extent of habitat within the Victorian works area).

The Inquiry accepts the residual ratings which are minor for the Pygmy Blue Whale, Southern Right Whale, Humpback Whale and other mysticetes, minor for the White Shark and syngnathids, minor for the Little Penguin and Short-tailed Shearwater during operation, and negligible for every other receptor group. The residual risks are acceptable because the exposure is short and localised, every sensitive species other than the syngnathids is highly mobile and able to move away from the zone of impact, and the syngnathid habitat that could be affected is of limited extent within the Victorian works area and is subject to avoidance measures.

The Inquiry supports the Proponent's Final Day EMF. The changes introduce a more structured procedure to avoid and minimise impacts through a specified procedure. Alignment with the EPBC Act Policy Statement 2.1 establishes an auditable procedure and addresses the concerns of DEECA and the Dolphin Research Institute.

There is potential for underwater noise to amplify where construction or survey activities from multiple projects occur concurrently. The relevant contribution from the Victorian works is mostly vessel noise and cable installations. The contribution from these activities would be limited and the proposed underwater noise mitigation measures provides an appropriate framework for managing the Victorian works contribution.

(v) Findings

The Inquiry finds:

- the noise modelling relating to marine fauna is robust and adequate
- noise impacts on marine fauna can be appropriately avoided, minimised and managed through the Proponent's proposed changes to the EMF, as shown in the Inquiry's recommended at Appendix H
- residual noise risks to marine fauna are acceptable.

7.5 Vessel interactions

(i) The issues

The issues are whether:

- impacts and risks associated with vessel presence and movements (including risk of vessel strike, artificial light spill, entanglement and propeller injury to marine fauna) were adequately assessed
- mitigation measures are appropriate and residual impacts are acceptable.

The following issues relating to vessel interactions are addressed in other chapters of this Report including:

- underwater noise (see Chapter 7.4)
- marine biosecurity (see Chapter 7.6)
- oil spill (see Chapter 7.7).

(ii) What did the EES say?

The EES assessed the potential impacts and risks associated with vessel movements and vessel-based activities within the offshore export cable area and transit routes to Victorian ports.

Construction, operation and decommissioning of the Victorian works would involve vessel movements within Victorian waters and between ports and the offshore Commonwealth works area. Increased vessel activity creates a risk of collision with marine mammals and turtles and propeller injury to diving seabirds, particularly Little Penguins. In addition, there is potential for vessel mooring activities to increase animal entanglement and vessel lighting to change the behaviour of marine fauna.

Vessel interactions (vessel strike and propeller injury) are assessed in EES Chapter 23, drawing on Technical Report D (Marine Mammals and Turtles) and Technical Report E (Offshore Ornithology and Bats). Both vessel strike and propeller injury interactions are treated as risks rather than impacts. The method is qualitative in both cases (there is no collision-probability model, no encounter-rate calculation and no vessel movement schedule in the exhibited material for either risk pathway). Collision risks during operation have been assessed as the same as for the construction phase.

Nine baleen whale species were determined to potentially occur in the Overall Project area, but the likelihood of occurring in the Victorian works area is significantly reduced due to their tendency to prefer deeper water. Southern Right Whales females and calves may occur in nearshore Victorian waters and are vulnerable to vessel strike due to their surface behaviour, slow swimming speed and use of nearshore habitat.

The Little Penguin is the only flightless diving seabird among the receptors and is considered the most susceptible seabird to propeller injury. A total of 789 individuals were recorded in the offshore wind farm area. The mouth of Corner Inlet is an important foraging area, particularly for Little Penguins from Rabbit Island, and the offshore project area overlaps part of that habitat, particularly in winter. Existing vessels travelling to and from ports within Corner Inlet are likely to traverse waters used by the Little Penguin.

Proposed mitigation measures include defined vessel movement corridors, minimum safe vessel speeds and marine fauna observations. Table 19 summarises impacts, risks and proposed mitigation measures relating to vessel interactions.

Table 19 Vessel and propeller strike impacts and risks and proposed mitigation measures

Impacts and Risks assessed	Mitigation measures	Residual rating
Marine mammals and turtles		
- MMT-R001 (Vessel strike leading to direct injury or mortality) - MMT-I004 (Artificial light emissions from vessels)	- VES-M06 (Vessel collision – marine mammals) - VES-M04 (Vessel movement controls) - VES-M07 (Propeller guards) - VES-M09 (Vessel crew environmental induction) - VES-M10 (Restricted speed in Southern Right Whale reproduction biologically important area) - VES-M11 (Adaptive management procedure for Southern Right Whales and Blue Whales) - LIT-M02 (Vessel artificial light management)	- Low for Blue Whale and for Southern Right Whale - Very low for all other marine mammal and turtle receptor groups - Artificial light Negligible for marine turtles and all other groups
Offshore ornithology and bats		
- OOB-R001 (Physical presence of construction vessels: propeller injury) - OOB-I006, OOB-I007, OOB-I008 (Artificial light emissions – attraction to light, disorientation and potential fallout or grounding)	- VES-M07 (Propeller guards) - VES-M04 (Vessel movement controls) - LIT-M02 (Vessel artificial light management) - VES-M01 (Vessel operations framework) - MEMP-M03 (Seabird monitoring and management plan)	- Very low for Little Penguin - No other seabird or shorebird receptor is assessed for this pathway - Artificial light Negligible to Low
Fish and invertebrates		
- No vessel strike or propeller injury pathway assessed - FIV-I004 (Light emissions and routine vessel discharge)	- Not applicable	- Not assessed - Light emissions Negligible, initial and residual, for every receptor group

The EES recognised vessel presence as a cumulative impact pathway for birds and other fauna. For Little Penguin, cumulative effects in Victorian waters from transiting vessels were assessed as temporary and negligible.

(iii) Evidence and submissions

Several submitters raised concerns regarding impacts resulting from vessel movement and interactions including:

- increased vessel traffic and the risk of vessel strike including to whales (DEECA and Dolphin Research Institute)
- entanglement risk from temporary moorings (DEECA and Responsible Future)
- vessel-related impacts on the migratory shorebirds of Corner Inlet, concentrated in the transport channels (Birdlife East Gippsland)
- artificial light emissions from vessels affecting seabirds
- changes to fish abundance and catchability as a consequence of multiple factors (SIV).

DEECA and the Dolphin Research Institute recommended that UWN-M06 (Marine Fauna Observers) be amended to include skilled, trained and dedicated Marine Fauna Observers rather than just trained crew.

DEECA submitted that it supported the proposed mitigation measures to minimise potential impacts to marine mammals and turtles, including the preparation of a Marine Mammal and Turtle Monitoring and Management Plan in consultation with DEECA (UWN-M06) as well as VES-M10 (Restricted speed in Southern Right Whale reproduction biologically important area) which limits vessel speed through the Southern Right Whale biologically important area for breeding.

The Dolphin Research Institute submitted the EES applies a precautionary approach to reducing vessel speed or temporarily ceasing operations when whales or dolphins are in the vicinity. These are routinely accepted risk management strategies, and the Dolphin Research Institute considered these adequate to protect whales and dolphins during construction in Victorian waters.

Submitters raised concern that multiple offshore wind project would substantially increase vessel movement to and from Gippsland ports, increasing risks of fauna disturbance and vessel interaction.

Dr Eagle gave evidence:

- Technical Report D identified vessel strike as a key risk and several mitigations (VES-M06, VES-M09, VES-M10 and VES-M11) were applied to manage the risk
- exposure will be short in duration and managed, and it is not expected the Victorian works will have long lasting impacts on migration patterns of any species, feeding in Blue Whales or Humpback Whales, communication or other biological functions in Southern Right Whales
- there will be no moorings in Victorian waters except regular vessel anchoring.

Dr Eagle stated that her recommended new mitigation measure (UWN-M16 – Vessel Underwater Noise Management) would address the concerns of DEECA and Dolphin Research Institute. She said the new measure "*clarifies the intention to use dedicated*

[Marine Fauna Observers] during the winter season for noise management when whales are more abundant, which will also reduce the risk of vessel strike".

Dr Greenwell stated that when considering the mitigations for all risk pathways in Victorian waters, specifically vessel propeller injury, unplanned hydrocarbon release, marine debris leading to entanglement, residual consequence ratings were very low. She said that no impact or risk pathways were identified as having potential for significant cumulative effects in Victorian waters.

Dr Greenwell and Mr Stewart both recommended that elements of the mitigation measure LIT-M01 (Infrastructure light management) in Technical Report F should be included in the EMF under LIT-M02 (Vessel artificial light management) to demonstrate that both mitigations will be applied in Victorian waters and to confirm compliance with the National Light Pollution Guidelines for Wildlife.

The Proponent submitted that each offshore export cable pull is expected to take up to one week, meaning that if 8 export cables are required the export cable vessel would be present in Victorian waters for up to 8 weeks in total, spread across a 19-month period.

The Proponent submitted the EES concludes that following implementation of the mitigation measures:

- the use of prescribed shipping routes and vessel speed limits significantly reduce the residual consequence, and residual impacts associated with vessel strike are acceptable
- consequence of noise and light emissions are expected to be negligible for all fish receptor groups.

The Proponent:

- accepted the new mitigation measure (UWN-M16 – Vessel Underwater Noise Management) recommended by Dr Eagle and amended UWN-M06 to ensure all dedicated Marine Fauna Observers will be suitability qualified and experienced to undertake the role consistent with EPBC Act Policy Statement 2.1, noting that in addition, all crew members would be provided an induction on Marine Fauna Observations whilst vessels are in transit (exhibited VES-M09)
- accepted expert recommendations regarding vessel lighting and amended LIT-M02 (Vessel Artificial Light management) accordingly
- added a clarification associated with temporary mooring lines to mitigation measure OFF-M23 (Temporary Mooring Lines), noting it requires:
  - if temporary mooring lines are utilised, lines will be subject to regular monitoring and ensured that they will not remain slack
  - entanglement incident responses will be proactively developed in the Vessel Operation Framework, to ensure a timely response.

(iv) Inquiry assessment

The Inquiry accepts the risk from vessel-related impacts is conservative because it is based on the Overall Project and not just the Victorian works. The assessment approach is robust and risks and impacts are well considered and thoroughly assessed. This includes risks and impacts from various shipping elements associated with vessel presence, including vessel strike, entanglement, propeller injury and impacts associated

with artificial light. The assessment appropriately considers the potential impact from these elements for the most sensitive or susceptible fauna groups, including the Southern Right Whale, marine turtles, the Little Penguin and other shorebirds.

For each impact and risk pathway identified, an appropriate associated mitigation measure has been identified. The Inquiry accepts the changes proposed by the Proponent.

The potential for marine mammal vessel strike was a common submitter concern. The Proponent's proposed changes to UWN-M06 (Marine Fauna Observers) and UWN-M16 (Vessel underwater noise management) appropriately strengthen the role of the Marine Fauna Observers. Further, VES-M09 (Provide an environmental induction to all crew member(s) including training for marine mammal observations whilst vessels are in transit) requires that all crew members are trained in Marine Fauna Observers while vessels are in transit. The Inquiry is satisfied that the risks associated with vessel strike are mitigated and sufficiently low residual risk.

Artificial light may impact marine fauna. In Australia, the National Light Pollution Guidelines for Wildlife are nationally recognised guidelines that provide guidance for managing artificial light for a number of faunal groups including marine turtles, seabirds, migratory shorebirds and bats. The Inquiry is satisfied that with the application of the National Light Pollution Guidelines the impacts can be managed to acceptable levels. This is included in amended LIT-M02 (Vessel Artificial Light Management) as proposed by Dr Greenwell and Mr Stewart, and accepted by the Proponent. Similar findings were made in relation to light impacts on onshore ecology at Chapter 6.4.

Temporary mooring is likely to occur infrequently and is unlikely to impact any significant populations and as such, predicted risks are acceptable.

The Inquiry understands the Little Penguin currently co-exists in an environment with existing shipping and boating, including in and around Corner Inlet. However, given the potential increase in vessel traffic associated with the Victorian works, propeller guards are considered a suitable control that sufficiently mitigates the risk to acceptable levels.

The Inquiry accepts the residual risk ratings (see Table 19) and these are acceptable. The Victorian works exposure is short and intermittent, the ratings are derived from the Overall Project and are conservative for the Victorian works, and each of vessel strike, propeller injury, entanglement and artificial light risk is managed by a specific measure.

The Inquiry supports the changes to the EMF proposed by the Proponent, including to UWN-M06 (Marine Fauna Observers), to LIT-M02 (Vessel Artificial Light management), OFF-M23 (Temporary Mooring Lines) and new measure UWN-M16 (Vessel Underwater Noise Management) and no further change to the vessel measures is required.

Increased regional vessel activity is a credible cumulative impact of multiple offshore wind projects. The marine coordination centre (VES-M03), defined vessel routes, and speed and marine fauna controls provide an appropriate basis for managing the contribution of the Victorian works to cumulative impacts.

(v) Findings

The Inquiry finds:

- the EES adequately assesses the impacts and risks associated with vessel presence the impacts associated with vessel presence and movements (including risk of vessel strike, artificial light spill, entanglement and propeller injury to marine fauna)
- mitigation measures are appropriate and residual impacts acceptable.

7.6 Marine biosecurity

(i) The issues

The issues are whether:

- marine biosecurity risks have been adequately assessed
- bird flu can be appropriately managed
- mitigation measures are appropriate and can achieve an acceptable environmental outcome.

The following issues relating to vessel interactions are addressed in other chapters of this Report including:

- threatened fauna (see Chapter 6.4)
- onshore biosecurity (see Chapter 6.7).

(ii) What did the EES say?

The EES assessed the risk of introducing and establishing invasive marine species within the offshore export cable area and Victorian MPA resulting from construction and operational vessel activities.

The assessment considered potential biosecurity impacts on benthic habitats and communities, fish and invertebrates, and protected area values including the Corner Inlet Ramsar site, Corner Inlet Marine National Park and Marine and Coastal Park, Nooramunga Marine and Coastal Park, and Wilsons Promontory Marine National Park and Marine Reserve.

Vessel movements have potential to introduce and establish invasive marine species through pathways including vessel ballast water and biofouling and the provision of new substrate on which invasive species could establish.

Technical Report B assessed the likelihood and consequences of invasive species establishment, informed by baseline surveys, vessel movement patterns and biosecurity requirements. It applied a risk-based framework to determine residual risk after mitigation measures.

Mitigation measures include ensuring that all vessels comply with relevant biosecurity legislation and guidelines (VES-M05), including managing discharges of ballast water and ensuring vessels are confirmed as a low biosecurity risk before entering Australian waters or commencing works.

For benthic ecology, the EES assesses the residual risk of introduction and establishment of invasive marine species as medium for FFG Act-listed species and low for seagrass, rocky reef and soft sediment habitats. The medium rating reflects the conservation significance and sensitivity of FFG Act-listed species, with the likelihood of an incursion assessed as rare. For fish and invertebrates, the residual construction risk is low for benthic invertebrates and very low for all other receptor groups.

The ratings are based on vessel activity and infrastructure across the Overall Project and are conservative for the Victorian works, where vessel activity would be substantially less.

(iii) Evidence and submissions

Submissions raised concern relating to the potential:

- for new hard substrate to provide an opportunity for marine pest establishments
- for ship ballast water to transport new marine pest or bird flu risks
- to introduce invasive species, including through increased vessel movements and general concerns in relation to whales and marine mammals.

One submitter requested to halt the Victorian works until bird flu is managed and contained. The same concern was raised in relation to onshore biosecurity in Chapter 6.7. The submitter was concerned about bird displacement from the Project area leading to crowding at alternative sites, as well as greater transmission risk associated with increased activity in the Victorian works area.

Mr Stewart gave evidence that with mitigation "*the likelihood of non-indigenous marine species incursion and establishment is rare, and the residual risk to different receptor groups ranges from low to medium*".

Dr Greenwell gave evidence that the Reeves Beach shore crossing location was selected in part because of its low bird numbers and diversity. She advised that bird flu is a reportable disease and the Project will follow the protocols established by the Victorian and Commonwealth governments if the virus is present during construction, operation and/or decommissioning. She recommended amending FFM-M007 (Control spread and/or introduction of weeds, pathogens and/or pest animals) to include a specific measure relating to bird flu.

The Proponent relied on the expert evidence. It submitted:

- the Project area is not of unique importance for birds and will not itself exacerbate threats from bird flu on account of habitat or other disturbance
- bird flu is an environmental risk the Project will need to respond to during construction, in accordance with the government directives applicable at the time, and other Victorian construction projects will also need to respond.

The Proponent amended FFM-M007 to include specific measures to minimise the risk posed by bird flu, including by implementing response measures specified by the relevant government agencies.

(iv) Inquiry assessment

The Inquiry is satisfied the biosecurity risk to the marine environment has been appropriately described and considered within each marine technical report and the EES, resulting in a robust assessment.

While there is potential for non-indigenous species establishment within newly created habitats (artificial substrate creation) this habitat will also provide new space for indigenous species to colonise and may result in a net-positive outcome. Given their relative size, the likely affected areas within the Victorian work area are not expected to result in a material benefit or disbenefit.

The Inquiry is satisfied that as required by VES-M05 (Vessel biosecurity controls) the appropriate controls and standards will be implemented in accordance with the *Biosecurity Act 2015* and risks can be minimised to acceptable standards. While shipping represents the main marine biosecurity threat, such risks are present within all waters where international shipping is prevalent and national and internationally recognised approaches to manage the risk exist.

The Inquiry accepts the residual ratings for marine biosecurity. The medium rating for FFG Act-listed species reflects the conservation status of the listed species rather than any elevated likelihood of an incursion, which is assessed as rare on every receptor group. The ratings are derived from vessel activity across the Overall Project and are conservative for the Victorian works, where vessel activity would be substantially less. On that basis, the residual risks acceptable and no changes to measures are recommended.

The presence of bird flu has emerged in Australia since the EES was prepared. The Inquiry understands the Reeves Beach shore crossing location was selected in part because of its low bird numbers and diversity which reduces the risk to offshore birds. The Inquiry is satisfied with the proposed approach to bird flu, including the Proponent's change to FFM-M007 (Control spread and/or introduction of weeds, pathogens and/or pest animals). The amendment to the mitigation measure will ensure the Victorian works comply with biosecurity requirements of the day.

(v) Findings

The Inquiry finds:

- the marine ecological assessments appropriately assess marine biosecurity risks
- bird flu can be appropriately managed through the mitigation measures in the Proponent's Final Day EMF
- marine biosecurity mitigation measures are appropriate and residual risks are acceptable.

7.7 Oil spill

(i) The issues

The issues are whether:

- the risk and potential effects of an oil spill (unplanned hydrocarbon release) have been sufficiently assessed
- mitigation measures are appropriate and residual impacts are acceptable.

(ii) What did the EES say?

The EES assessed the risk of accidental oil (hydrocarbon) release through vessel collision, refuelling or other accidental spills. An oil spill could affect marine habitats and species and, depending on its trajectory, coastal and protected areas including Corner Inlet.

Oil spill impacts were evaluated through hydrocarbon release modelling, as detailed in EES Attachment II (Oil Spill Modelling Summary). The modelling was undertaken for two release locations near the inshore boundary of the offshore wind farm area (not within Victorian waters). The models explored two different release scenarios including a large 300 cubic metres of marine gas oil and a smaller 40 cubic metre release of mineral oil. The modelling found considerable variability in the potential direction and extent of a spill under the different models.

The EES identified the following:

- For fish and invertebrates, modelling identified approximately a 1 percent probability of dissolved hydrocarbons at potentially toxic concentrations entering Corner Inlet.
- For benthic receptors, a less than 2 percent probability of an oil spill was identified from modelled inshore locations entering Corner Inlet.
- For seabirds and shorebirds, the modelling similarly identified a less than 2 percent probability of shoreline accumulation in Corner Inlet, Nooramunga Marine and Coastal Park and the Seal Islands.

Vessel management, collision prevention and spill response are identified as the main ways to reduce the likelihood and consequences of a spill. Mitigation measures include vessel safety controls and a Spill Response Plan aligned with the Victorian Marine Pollution Contingency Plan to reduce the likelihood of vessel collision and provide for response to a spill. Table 20 summarises the oil spill risks, mitigation measures and residual rating by receptor groups.

Following mitigation, residual risk was assessed as medium for FFG Act-listed species and low for benthic habitat receptor groups. The EES recognised the high sensitivity of birds to oil exposure but considers a major spill to be very unlikely.

The EES stated that significant cumulative impacts on benthic ecology (including oil spill impacts) are not predicted.

Table 20 Oil spill risks and proposed mitigation measures

Risks assessed by receptor	Mitigation measures	Residual rating
Benthic ecology		
- Oil spill resulting from collision of a project vessel	- VES-M01 (Vessel operations framework) - SPL-M02 (Spill response plan) - SNV-M05 (Project vessel safety requirements)	- Medium for species listed under the FFG Act - Low for soft sediment (seagrass) and rocky reef habitat
Fish and invertebrates		
- Hydrocarbon release from collision of a project vessel	- VES-M01 (Vessel operations framework) - VES-M03 (Marine coordination centre) - VES-M04 (Vessel movement controls) - SPL-M02 (Spill response plan)	- Very low for White Shark and benthic mobile sharks, rays and bony fish - Low for syngnathids, site-attached bony fish and shark eggs
Offshore ornithology and bats		
- Unplanned hydrocarbon release: oil spill and toxicity	- VES-M01 (Vessel operations framework) - VES-M03 (Marine coordination centre) - VES-M04 (Vessel movement controls) - SPL-M01 (Refuelling and resupply limitations) - SPL-M02 (Spill response plan)	- Very low for all seabirds and shorebirds
Marine mammals and turtles		
- Accidental hydrocarbon release	- VES-M01 (Vessel operations framework) - VES-M04 (Vessel movement controls) - VES-M05 (Vessel biosecurity controls) - SNV-M07 (Vessel passage plan) - SPL-M01 (Refuelling and resupply limitations) - SPL-M02 (Spill response plan)	- Low for all marine mammals and turtles

Risks assessed by receptor	Mitigation measures	Residual rating
Marine protected areas		
- Accidental hydrocarbon spill from vessel collision	- VES-M01 (Vessel operations framework) - SPL-M01 (Refuelling and resupply limitations) - SPL-M02 (Spill response plan) - SNV-M05 (Project vessel safety requirements)	- Corner Inlet Ramsar site: Very low for seagrass, intertidal flats, saltmarsh and mangrove; Low for waterbirds, threatened birds, threatened fish and fish - Nooramunga: Very low to Low across the same values

(iii) Evidence and submissions

Some submitters raised concerns about the impacts of oils spills, including cumulative impacts. Birdlife East Gippsland raised concerns about the impacts of oil spills around construction sites and transport channels on migratory waders and breeding shorebirds at Corner Inlet.

For benthic ecology and MPAs (the two receptor groups for which the oil spill risk is highest), Mr Stewart confirmed that all residual impacts were assessed as low to medium for the benthic receptor group and did not recommend any changes to the mitigation measures.

Dr Greenwell and Dr Eagle both agreed with the findings of the EES. Dr Greenwell relied on the mitigation measure SPL-M02 (Spill Response Plan) to appropriately mitigate risk to sensitive marine receptors.

Mr Stewart confirmed that Tables 26-7 and 26-8 in the EMF adequately capture the EES recommendations, and the experts did not seek any change to the spill measures or the modelling.

The Proponent submitted the residual risk rating is very low for all shorebirds including migratory shorebirds, and that a collision spill is remote because a marine coordination centre will be in place to manage movements of project vessels (VES-M03) and project vessels will use defined shipping routes between ports and within Corner Inlet (VES-M04). It said the Spill Response Plan would ensure a timely and proportionate response.

(iv) Inquiry assessment

The Inquiry accepts the EES findings that:

- residual risk of an unplanned hydrocarbon release from Victorian works is very low to low for fish and invertebrates, seabirds and shorebirds, marine mammals and turtles and the MPA values, and medium for species listed under the FFG Act (benthic species)
- an oil spill is a rare event on every assessment, and the mitigation package materially reduces the likelihood of the collision that would cause one.

The Inquiry notes that there are some limitations to the oil spill modelling and representation in EES Chapter 23:

- The modelling was completed on a Project description that is superseded (see the cover note in EES Attachment II (Oil Spill Modelling Summary).
- The modelling does not consider a spill within the Victorian works area (a Victorian release would begin closer to shore than anything modelled).
- The oil spill outcome described in EES Chapter 23 (floating oil drifting less than 50 kilometres, with a less than 2 per cent probability of stranding) describes the surface pathway only. The water column results, which reach benthic habitat and extend to roughly 150 to 160 kilometres at low probability, are not reflected in the EES chapter.

Overall, however, the Inquiry is satisfied that Technical Reports B, C, D, E and F and EES Attachment II (Oil Spill Modelling Summary) appropriately consider the risk, likelihood and residual risks of oil spill for the following reasons:

- while the Project description has altered, the modelling is assessing potential scenarios (that arise in an accident)
- there are many potential scenarios, and the modelling is adequate for the purpose of informing the risk and impact pathways associated with an accidental oil spill
- the mitigation measures proposed are generic in nature and reflect standard practice. The mitigation measures do not need to be tailored based on where the oil spill arises, hence the modelling of scenarios is less relevant in informing the specific mitigation measures in the EMF.

The Inquiry is satisfied with the mitigation measures including VES-M01 (Vessel Operations Framework), VES-M03 (Marine coordination centre), VES-M04 (Vessel movement controls), VES-M05 (Vessel biosecurity controls), SNV-M05 (Project vessel safety requirements), SPL-M01 (Refuelling and resupply limitations) and SPL-M02 (Spill Response Plan) – address both causes of the risk, being the likelihood of the collision that would cause a spill and the response once one has occurred.

SPL-M02 (Spill Response Plan) should be amended to require consultation with DTP and give greater certainty to alignment with State spill response arrangements. The Spill Response Plan should be prepared in consultation with DTP to ensure it aligns with the Victorian Marine Pollution Contingency Plan. While EES Chapter 23 states the Spill Response Plan would align (which is administered by DTP) this is not captured in the EMF. As DTP is the agency that administers the Victorian Marine Pollution Contingency Plan and would lead the State response to a spill in Victorian waters.

The EMF adequately manages cumulative oil spill impacts and risk noting:

- oil spill is an accidental risk rather than an impact that necessarily accumulates as projects proceed
- increased vessel activity may increase the number of opportunities for an incident, but this does not mean that spill consequences necessarily combine.

The changes the Inquiry recommends address both matters are shown in the Inquiry recommended Environmental Management Framework at Appendix E.

(v) Findings

The Inquiry finds, subject to its recommendations:

- the risk and potential effects of an oil spill have been sufficiently assessed
- the mitigation measures are appropriate
- the residual risks to the Victorian marine environment are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend Mitigation Measure SPL-M02 (Spill Response Plan) to require the Spill Response Plan to be prepared in consultation with the Department of Transport and Planning, and update Table 26-4 (List of CEMP sub plans and other management documents) and Table 26-6 (List of OEMP sub plans and other management documents) accordingly.

7.8 Clause 43 matters

The Inquiry considers the following matters are appropriately dealt with under Clause 43 of the Terms of Reference and do not warrant detailed assessment.

Table 21 Matters excluded from detailed assessment

Issue	Inquiry determination and comments
Marine electromagnetic field	During operation, up to 145 kilometres of export cables would produce localised electromagnetic fields. While the electromagnetic fields were not modelled for the specific cable design, the EES considered impact from other designs and modelling of cables overseas. The EES noted that the cables will be carrying alternating current which produce lower electromagnetic fields compared to direct current systems. The cable will have a metal sheath which confines the electric field so that the resulting electric field is caused by fluctuations of the magnetic field. The assessment identified benthic sharks, rays and invertebrates as the most vulnerable to any impacts of electromagnetic radiation. A distance of five metres either side of the cables during the pre-burial testing phase was reported as the maximum behavioural effects range. The strength of electromagnetic fields rapidly weakens with distance from the source. Impacts would be mitigated by burying or covering the export cables at a minimum depth of 1.0 metre (EMI-M01). A post-lay cable burial assessment would provide accurate measurement of the cable's 'as-laid' position and depth below the seabed (MEMP-M09), and ongoing monitoring of cables will identify any change that is indicative of altered burial depth. A remedial burial strategy will be implemented if offshore cables are found to be inadequately buried (MEMP-M09). Following these mitigation measures, impacts from electromagnetic fields during the operation phase is likely to be restricted to individuals, with population level impacts not expected for any fish and invertebrate species. Initial and residual consequences have been assessed as minor

for the more sensitive benthic groups and negligible for all other receptor groups.

The Inquiry considers the impact pathway is conventional and that the proposed controls are generally consistent with established environmental management practice and/or recognised industry guidance.

No submissions or other material before the Inquiry identified matters that would materially alter the EES assessment.

8 Coastal processes

8.1 Background

The following EES Chapters and technical reports are relevant to coastal processes:

- Chapter 23 (Victorian Marine Environment)
- Technical Report A (Coastal Processes and Sediment Transport).

Table 22 shows the relevant Evaluation Objectives.

Table 22 Evaluation objectives – Coastal processes

Impact/effect	Evaluation objective
Biodiversity and habitat	To avoid, and where avoidance is not possible, minimise, potential adverse effects on protected native vegetation and listed threatened species and their habitat and listed ecological communities, in both onshore and offshore environments, as well as address offset requirements consistent with state policies.
Water and catchment values	To minimise adverse effects on water (including groundwater, waterway, wetland, estuarine, intertidal and marine) quality and movement.

Table 23 shows the relevant legislation, policy and guidelines.

Table 23 Relevant legislation, policy and guidelines – Coastal processes

Legislation	Policy/guidelines
- EP Act - MAC Act - Water Act	- Marine and Coastal Policy 2020 (DELWP, 2020) - Victorian Marine and Coastal Strategy 2022 (DELWP, 2022)

Expert evidence was given by Dr David Provis (coastal processes) on behalf of the Proponent.

8.2 Coastal processes

(i) The issues

The issues are whether:

- the impacts on coastal processes (including hydrodynamics and sediment transport) can be avoided, or if avoidance is not possible, appropriately minimised and managed
- there should be a mitigation measure in the EMF to require the monitoring of coastal changes during the operational life of the Project.

(ii) What did the EES say?

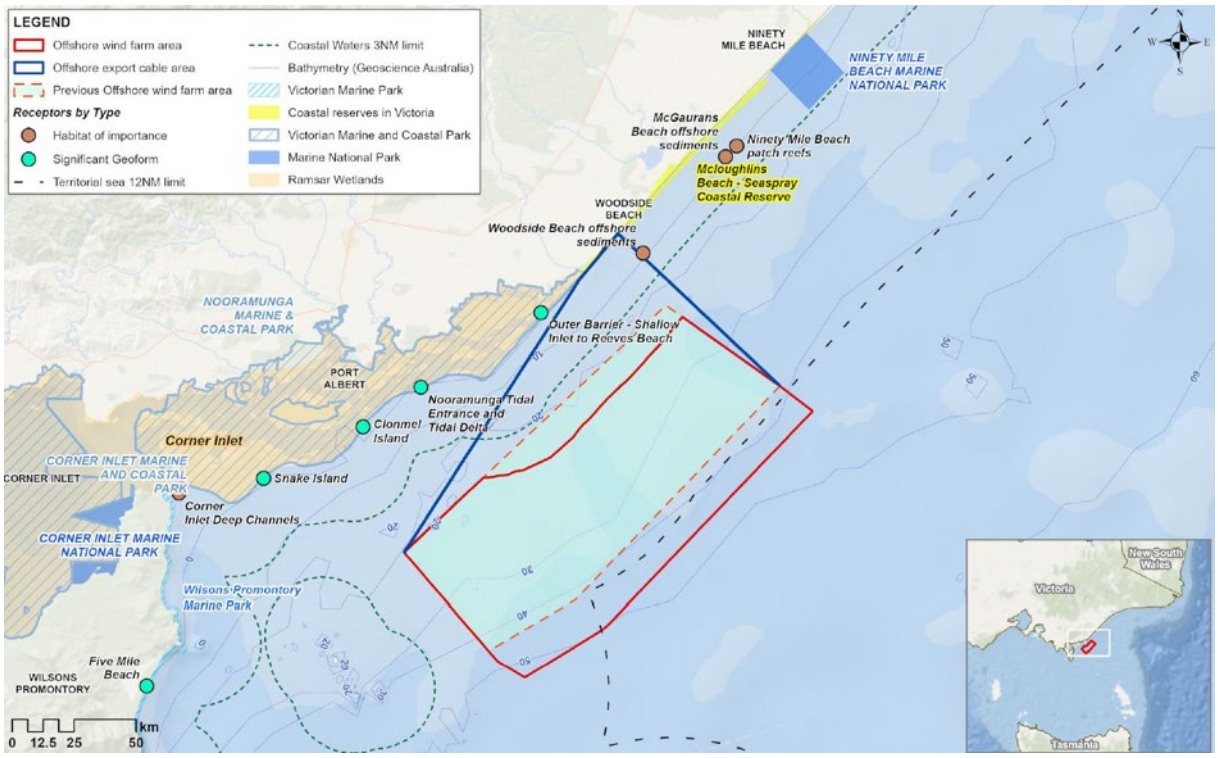
The EES assessed the potential effects of the Victorian works on coastal processes and sediment transport during construction, operation and decommissioning.

The EES documented existing coastal conditions using field data, literature review and modelling of waves, currents, sea levels and sediment transport. Sensitive receptors were identified including habitats of importance and significant geoforms (see Figure 9).

The assessment criteria relevant to coastal processes and sediment transport included:

- no substantial modification of the Corner Inlet Ramsar wetland or its coastal processes
- no change to coastal processes generally outside natural variability.

Figure 9 Sensitive receptors for the coastal processes and sediment transport assessment



Source: EES Technical Report A

For construction impacts, the EES adopted a qualitative assessment criteria because of the relatively small spatial and temporal scale of the construction activities.

The key construction impact pathway assessed was excavation of the HDD exit pits and cable trenches. Each HDD exit pit involves excavating approximately 1,000 cubic metres of seabed and would be approximately 50 metres long, 10 metres wide and 2 metres deep. The assessment considered the potential for these works to cause localised changes in wave direction and energy leading to altered coastal processes.

The EES found that excavation of the HDD exit pits and cable trenches would result in localised and temporary disturbance of seabed sediments but would not impact wave energy arriving at the coast. It predicted the excavations would naturally backfill over weeks to months, or potentially more quickly during storm conditions, without broader effects on coastal processes or sediment transport.

The exhibited mitigation measure MEMP-M05 (Coastal monitoring) requires:

- precautionary monitoring of coastal change one year prior to construction and for the first 10 years of operation to detect any changes to coastal landforms outside the range of natural variation

- as an adaptive management measure, should any changes to the coastal system be identified as a result of the Project the Proponent will work with regulators to establish appropriate mitigation measures or offsets.

Overall, the EES assessed residual impacts of the Project as nil (operational phase) to negligible (construction and decommissioning phases). The EES stated while potential changes have been identified, the magnitude is significantly less than natural variability and may be difficult to identify through monitoring (although this is still needed).

The cumulative impact assessment found no potential for construction-phase impacts because the Project's construction impacts would be localised and temporary and would not overlap with impacts from other projects.

(iii) Evidence and submissions

Several submitters raised concerns regarding impacts to coastal processes and sediment transport, including whether any changes remain localised or could cause wider area and long-term impacts. One submitter raised a concern about the ability to maintain cable burial.

Dr Provis agreed with the assessment in Technical Report A that the Victorian works will have no meaningful impact on coastal processes. He stated that with the dynamic coastal environment and relatively minor width of the excavation works the area impacted by Victorian works would backfill quickly. The narrow width of the excavation works relative to the wave length (which is typically tens of metres) means there would be no impact from the Victorian works on natural coastal processes.

Dr Provis considered, however, that the monitoring period specified in MEMP-M05 (Coastal monitoring) should not be limited to 10 years. Monitoring should continue for the operational life of the Project.

In response to a question from the Inquiry, Dr Provis stated that he was not an expert on measures to stabilise cables but considered that stabilisation would be more likely to be needed further offshore.

The Proponent submitted that consistent with the evidence, there is no feasible means by which the Victorian works could materially impact on the coastal processes. It said MEMP-M05 (Coastal monitoring) would be better directed to the Overall Project and incorporated into the Commonwealth EMF. The Proponent removed MEMP-M05 from its Fina Day EMF.

(iv) Inquiry assessment

The EES provides a comprehensive assessment on the potential effects of the Victorian works on coastal processes and sediment transport. The assessment and conclusions are robust and supported by the evidence.

The Victorian works will have nil to negligible residual effects in terms of coastal processes and sediment transport impacting coastal receptor areas. The relatively small size of HDD pits and brief duration of works means that works in Victorian waters would not impact wave energy arriving at the coast and the pits would be filled rapidly by

natural processes. The works are likely to cause only localised disturbance of sediments at the seabed with short-term recovery.

While the assessment and evidence support the conclusion that the Victorian works will have nil to negligible impacts on coastal processes, a precautionary approach should be adopted given the sensitivity of the coastal environs. A requirement for coastal monitoring should be included as recommended in Technical Report A. Exhibited MEMP-M05 (Coastal monitoring) appropriately requires that mitigation measures be identified to offset any changes to the coastal system picked up by coastal change monitoring.

MEMP-M05 (Coastal monitoring) should be reinstated in the Victorian EMF or alternatively, as proposed by the Proponent, a similar mitigation measure should be included in the Commonwealth EMF. Either approach would achieve the objective for coastal change monitoring and would be acceptable. As the Inquiry cannot make recommendations in relation to the Commonwealth process, it has retained the mitigation measure in the Victorian EMF.

It is unclear why the precautionary monitoring required by MEMP-M05 should be limited to 10 years. The Inquiry agrees with Dr Provis that it would be desirable for the coastal monitoring to continue for the life of the Project. Coastal change due to Victorian works is unlikely to be significant but given the dynamic nature of the coastal environment, the potential for coastal impacts may change overtime. It would be logical to extend the monitoring timeframe to the expected life of the Project.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the residual impacts on coastal processes, including hydrodynamics and sediment transport, are likely to be nil to negligible due to the Victorian works and can be appropriately minimised and managed
- monitoring of coastal changes during the operational life of the Project should be required either by retaining mitigation measure MEMP-M05 in the Victorian EMF or the inclusion of a similar measure in the Commonwealth EMF, and coastal monitoring should be required for the operational life of the Project.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Include mitigation measure MEMP-M05 (Coastal monitoring) (unless a similar mitigation measure is included in the Commonwealth Environmental Management Framework) as shown in the recommended Environmental Management Framework, and specify that the monitoring should continue for the operational life of the Project.

9 Aboriginal cultural heritage

9.1 Background

The following EES Chapters and technical reports are relevant to Aboriginal cultural heritage:

- Chapter 13 (Onshore Aboriginal cultural heritage)
- Chapter 19 (Submerged Aboriginal cultural heritage)
- Technical Report K (Aboriginal cultural heritage)
- Technical Report Z (Submerged Aboriginal cultural heritage).

Table 24 shows the relevant Evaluation Objective.

Table 24 Evaluation objective – Aboriginal cultural heritage

Impact/effect	Evaluation objective
Cultural heritage	To avoid or minimise adverse effects on Aboriginal and historic cultural heritage and associated values.

Table 25 shows the relevant legislation, policy and guidelines.

Table 25 Relevant legislation, policy and guidelines – Aboriginal cultural heritage

Legislation	Policy/guidelines
- Aboriginal Heritage Act - Aboriginal Heritage Regulations 2018 - MAC Act - PE Act - Traditional Owner Settlement Act 2010	- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013 (Australia ICOMOS, 2013) - Marine and Coastal Policy 2020 (DELWP, 2020) - Victorian Marine and Coastal Strategy 2022 (DELWP, 2022)

Expert evidence was given by Ricky Feldman (onshore Aboriginal cultural heritage) and Erica Walther (offshore Aboriginal cultural heritage) on behalf of the Proponent.

9.2 Aboriginal cultural heritage

(i) The issues

The issues are whether:

- impacts on Aboriginal cultural heritage can be appropriately avoided, minimised and managed
- proposed Traditional Owner engagement is adequate
- a Cultural Values Assessment (CVA) should be undertaken in consultation with Bunurong Traditional Owners
- culturally significant fauna species are adequately considered.

(ii) What did the EES say?

Overall assessment

The EES assessed the potential effects of Victorian works on Aboriginal cultural heritage values associated with construction, operation and decommissioning in both the onshore and offshore (submerged) environments.

The EES referred to the MAC Act and associated strategy and policy which require consideration of cultural heritage values on coastal Crown land (between the outer limit of Victorian waters and 200 metres inlands of the high-water mark).

For onshore Aboriginal cultural heritage:

- The assessment comprised a desktop review, field investigations, consultation with the Gunaikurnai people, represented by Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) and a predictive model.
- The assessment identified 24 Aboriginal cultural heritage places within the study area[8], including two previously registered places and 22 newly recorded places. All were assessed as having scientific and cultural value, with some broader landscapes, such as the Ninety Mile Beach barrier dune system, also recognised as culturally significant.
- Proposed mitigation measures included a CHMP (ACH-M001), CVA (ACH-M002), trenchless shore crossing design (ACH-M003) and radiant heat controls (ACH-M005).
- Residual effects ranged from major to minor, and residual risks from medium to low.
- It is not possible to quantify cumulative impacts due to lack of information and uncertainty about other projects proceeding in the area.

For submerged Aboriginal cultural heritage:

- The assessment comprised desktop research, archaeological sensitivity modelling, and marine geophysical and geotechnical survey data.
- The assessment identified a number of submerged palaeolandscape features that may contain archaeological or cultural heritage values from a period when the offshore Project area was dry land between approximately 71,000 and 11,000 years ago, however no confirmed submerged Aboriginal cultural heritage sites were identified.
- Proposed mitigation measures included additional geotechnical and geophysical surveys (SCH-M001), geoarchaeological assessment (SCH-M002), a CHMP (SCH-M003), cultural heritage inductions (SCH-M005) and contingency protocols (SCH-M006 and SCH-M007).
- Residual impacts associated with direct and indirect physical disturbance ranged from moderate to negligible, while residual risks ranged from low to very low (depending on the archaeological sensitivity and cultural heritage potential of individual palaeolandscape features).

[8] Includes the onshore project area where direct impacts could occur plus a 15-metre buffer

- With implementation of mitigation measures, cumulative impacts are unlikely due to the localised and short term nature of Victorian works.

The EES noted:

> A Cultural Values Assessment was also prepared in consultation with GLaWAC and has informed the Aboriginal cultural heritage assessment. However, as it contains sensitive information this document will not form part of the exhibited EES documentation.

Overall, the EES stated the assessment was conservative because:

- onshore Aboriginal cultural heritage - the significance and appropriate treatment of some places are subject to the CHMP process and decisions by GLaWAC
- submerged Aboriginal cultural heritage:
  - it assumed potential heritage values may be present even though no submerged Aboriginal cultural heritage sites were identified
  - the assessment combined the Commonwealth waters and Victorian waters, however most of the Overall Project works occur in Commonwealth waters.

Traditional owner engagement

The EES explained that the Scoping Requirements require the Proponent to inform and consult First Nations peoples, communities and relevant stakeholders, and to develop and implement a Consultation Plan.

The consultation approach is based on the following principles:

- open and transparent
- responsive
- flexible and inclusive
- act with integrity
- accountable.

The EES stated the Proponent:

> is committed to delivering a responsible project in partnership with Gippsland's Traditional Owners and First Nations peoples, with a focus on minimising impacts to Country and creating opportunities.

The Traditional Owners of the Project area are the Gunaikurnai people, represented by GLaWAC. The EES noted the Project may be of interest to other First Nations people outside the Project area, and the Proponent is committed to open and meaningful engagement with individuals and Registered Aboriginal Parties across Australia whose communities have an interest.

The Proponent has established an Engagement Agreement with GLaWAC and has had regular engagement during the Project planning process. The EES noted there may be a cumulative impact to GLaWAC due to the level of engagement and resourcing demands associated with multiple projects, and the Engagement Agreement will help to address this potential impact.

The Bunurong Land Council Aboriginal Corporation (BLCAC) is the Registered Aboriginal Party for the Mornington Peninsula, Westernport and a portion of south-west Gippsland. Recognising the proximity of the Project to Bunurong Country, the Proponent engaged

with BLCAC representatives. It stated that further engagement with BLCAC would be undertaken according to BLCAC's preferences.

The EMF includes a Communications and Stakeholder Engagement Plan (Sections 26.5 and 26.7.1) for construction and operations to guide consultation with Traditional Owners (among other stakeholders) and "*to meet the requirements of the OEI Act*" [*Offshore Electricity Infrastructure Act 2021* (Cth)].

(iii) Evidence and submissions

Overall assessment

Both experts (Ms Walther and Mr Feldman) were satisfied the Aboriginal cultural heritage technical assessments responded appropriately to the Scoping Requirements. Mr Feldman explained he was satisfied that:

- the assessments were based on an appropriate study area, methodology and consultation and engagement with relevant Traditional Owners and Registered Aboriginal Parties (RAP)s
- EES Chapter 13 (Onshore Aboriginal Cultural Heritage) accurately reflects the assessments, and impact and risk descriptions were appropriate
- the mitigation measures adequately capture the assessment findings and satisfy the relevant evaluation objectives.

Ms Walther advised that EES Chapter 19 (Submerged Aboriginal Cultural Heritage) accurately translates and summarises the findings of the relevant technical report, including relevant impact and risk pathways, and the EMF adequately captures the recommendations of the technical report.

Traditional Owner Engagement

Some submitters raised issues relating to appropriate and adequate engagement with First Nations people.

BLCAC submitted it is important that Traditional Owners "*whose cultural values, interests, or rights may be affected by project activities are provided with timely and transparent information*". It requested the Proponent continue to provide relevant information of interest to Bunurong people in a timely manner and an opportunity to review and provide input.

In response to issues raised in submissions, Ms Walther recommended a Traditional Owner Engagement Plan be required.

The Proponent advised it is committed to meaningful engagement with Traditional Owners and supported Ms Walther's recommendation. It proposed a new mitigation measure ACH-M006 (Traditional Owner Engagement Plan) as follows:

> A Traditional Owner Engagement Plan will be prepared in consultation with Traditional Owners, including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the project. The Traditional Owner Engagement Plan will provide a framework for ongoing engagement, communication, consideration of feedback and resolution of issues throughout the life of the project.

Cultural Values Assessment

BLCAC noted the Project is located outside of its Country, however the marine environment is interconnected and contains landscapes, stories and values that extend beyond contemporary administrative boundaries. It submitted a CVA should be undertaken in consultation with Bunurong Traditional Owners to ensure relevant cultural values are properly identified and considered.

Both Mr Feldman and Ms Walther supported preparation of a CVA in consultation with BLCAC. The Proponent stated:

> While neither expert considered a CVA of this type to be necessary in respect of the Victorian works alone, each expressed the view that there would be benefit in a CVA being prepared in consultation with BLCAC in respect of the potential impacts of the broader Project.

The Proponent advised a CVA had been prepared in respect of GLaWAC cultural values, in consultation with GLaWAC.

The Proponent explained that no part of the Project works fall within land for which BLCAC is the RAP (which is a neighbouring area). It submitted:

> notwithstanding, recognising the proximity of the Project to Bunurong Country, Star of the South has provided briefings to BLCAC representatives and shared updates as appropriate.

Further:

> …given the nature of the BLCAC's concerns, and the views expressed by both Mr Feldman and Ms Walther as to the proper scope of any such CVA, it is anticipated that the CVA will concern the impacts associated with the Project as a whole (as opposed to the Victorian works in isolation).

The Proponent confirmed it had written to BLCAC committing to further engagement and working collaboratively to prepare a CVA. It stated:

> In accordance with BLCAC's preferences, it is anticipated that the CVA will be prepared by BLCAC's Cultural Values Unit, with support and input from the Star of the South. Given that the CVA will be prepared in this fashion, it will be a matter for the BLCAC's Cultural Values Unit (working in collaboration with Star of the South) to determine the precise scope of the CVA and how it may consider the potential cumulative impacts of other offshore windfarm projects.
>
> Because the BLCAC CVA will be directed towards broader project impacts, it is not necessary or appropriate that the Victorian EMF to specifically address its preparation. Indeed, both Mr Feldman and Ms Walther indicated in their evidence, that those works did not warrant the preparation of a further CVA on those terms.

Culturally significant species

BLCAC submitted the Project has potential to have indirect impacts on migratory mammals and bird species of cultural significance to Bununrong People. It said:

> This includes species such as the Southern Right Whale, Humpback Whale, Blue Whale, Australian Fur Seal and Burrunan Dolphin, as well as migratory and seabird species including the Short-tailed Shearwater, Wandering Albatross, Shy Albatross and other migratory birds protected under international agreements. BLCAC is concerned that impacts to these species may not be confined to the project area and may extend across interconnected marine ecosystems and cultural landscapes that are important to Traditional Owners.

Mr Feldman stated that:

> Consideration of likely impacts on culturally significant species or iconic species, such as kangaroos and koalas would be most appropriately addressed in Technical Report Appendix G, Onshore Ecology. However, it is possible that the BLCAC's concerns would not be limited to the potential impacts on non-threatened culturally significant or iconic species, such as kangaroos and koalas. Further consultation with the BLCAC would be required to adequately establish and address their concerns regarding potential impacts on culturally significant species.

Ms Walther stated:

> This submission from BLCAC highlights the interface between ecological impact assessment and Aboriginal cultural heritage assessment, particularly where culturally significant species are concerned. In my professional experience, Aboriginal cultural heritage practitioners are increasingly asked to consider these relationships. Whilst such relationships may be recognised by Traditional Owners, ecological significance and cultural significance are not synonymous and require different assessment approaches and expertise. Accordingly, the Technical Report has confined its assessment to Aboriginal cultural heritage matters within the submerged landscape, within its scope, and does not draw conclusions regarding ecological significance or ecological impact.

Mr Lane advised that Kangaroos had not been specifically assessed but that potential construction impacts could be managed through FFM-M005 (Flora and Fauna Management Plan), including measures to prevent fauna entering construction areas. He considered a similar approach could be applied to wallabies, emus and wombats. Mr Lane considered it standard practice in locations across Melbourne to manage impacts on Kangaroos during construction.

The Proponent explained:

- the impacts on culturally significant fauna species are appropriately considered through the CVA (noting the CVA prepared in consultation with GLaWAC has not been published)
- matters raised by BLCAC relating to culturally significant fauna species may be addressed through a separate CVA to be prepared in respect of the Project as a whole
- Technical Report G (Onshore ecology) concludes the impact on koalas will be negligible, and while this is an ecological assessment "*any consequential impact on intangible cultural heritage values would also necessarily be limited in this regard*".[9]

(iv) Inquiry assessment

Overall assessment

The Inquiry accepts that the EES adequately details the methodology and findings of the assessments and accurately reflects the findings of the technical reports. The methodology used in the technical assessment was comprehensive and conservative, and the assessments were prepared in consultation with the GLaWAC as the relevant RAP.

[9] Document 86

Traditional owner engagement

The Inquiry is satisfied the additional mitigation measure (ACH-M006) calling for a Traditional Owner Engagement Plan (as proposed by Ms Walther and the Proponent) is appropriate. The plan is required to be prepared in consultation with Traditional Owners, including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the Project (EMF Tables 26-4 and 26-6).

The Inquiry recommends amending Table 26-7 in the EMF requiring the Traditional Owner Engagement Plan be prepared before construction, and apply throughout the life of the Project, including decommissioning. The Proponent has already undertaken extensive engagement with Traditional Owners, and the preparation of the plan before construction will ensure early engagement, transparency and timely provision of information and opportunity to seek and consider feedback. Likewise it will be important to engage with Traditional Owners during decommissioning to ensure an appropriate response to known cultural values at that time.

The mitigation outcome for ACH-M006 states "*Manage impacts to Traditional Owners with an interest in the project through effective communication*". To better reflect the intent of the mitigation measure the Inquiry recommends this be amended to also refer to engagement.

The Inquiry observes the requirement for a Communications and Stakeholder Engagement Plan includes reference to the OEI Act. The EMF does not explain the reference to OEI Act (the Inquiry understands this to refer to the *Offshore Electricity Infrastructure Act 2021* (Cth)). The Inquiry recommends removing the reference to OEI Act as it is not relevant to the Victorian works.

CVA and culturally significant species

Consent under the MAC Act will be required for use and development of the Victorian works on marine and coastal Crown land. The MAC Act includes the following objectives (among others):

- to acknowledge traditional owner groups' knowledge, rights and aspirations for land and sea country
- to improve community, user group and industry stewardship and understanding of the marine and coastal environment
- to engage with specified Aboriginal parties, the community, user groups and industry in marine and coastal planning, management and protection.

The associated Marine and Coastal Policy includes policy guidance with an emphasis on:

- respecting, facilitating and supporting Traditional Owner engagement, knowledge
- embedding Traditional Owner aspirations into decision making, planning and management
- supporting enduring connection to the marine and coastal environment.

The Marine and Coastal Strategy 2022 confirms that RAP boundaries extend into marine waters to State limits and includes the following action:

> Traditional Onwers determine how their rights and obligations are embedded into planning and management of the marine and coastal environment.

In this context the EMF should include a commitment to prepare a CVA with BLCAC. The EES states the Proponent is committed to open and meaningful engagement with Traditional Onwers and RAPs with an interest in the Project. While experts noted a BLCAC CVA is not relevant to the Victorian works alone and the Proponent was of the view this more appropriately applies to the Overall Project, the marine environment is of interest to the BLCAC and includes the Victorian works area. Aboriginal cultural heritage values in the marine environment include culturally significant migratory fauna species which are present in Victorian waters.

The Proponent has been proactively engaging with BLCAC regarding the Project, and it has advised it is committed to collaborating with it to prepare a CVA. Accordingly, the preparation of a CVA in conjunction with BLCAC should be a requirement in the EMF. This will provide greater certainty and transparency regarding the existing commitment from the Proponent to BLCAC, and will help ensure objectives of the MAC Act are met.

ACH-M002 (Cultural Values Assessment requires the CVA to assess impacts to intangible, non-archaeological Aboriginal heritage places and/or values. This is appropriate and will allow for impacts on values associated with culturally significant species to be assessed.

While the ecological assessment provides an understanding of some ecological impacts, this does not equate with cultural values impact assessment which may relate to specific species/ecological communities and different impact pathways that do not directly correlate with the ecological assessment. It is important for culturally significant fauna species to be considered and impacts assessed, and the CVA is the current tool for this. This is not required by legislation so to provide some certainty it should be required by the EMF. This is an opportunity to formalise a commitment to an existing agreement and understanding.

Any requirement for a BLCAC CVA through the Commonwealth EMF can be coordinated with the Project. The CVA should be prepared before construction.

As advised by Mr Lane, species-level management plans Kangaroo are ordinarily secondary-consent matters and standard approaches exist in Victoria. The measures identified in FFM-M006 as applicable to other fauna will appropriately minimise construction risks to Kangaroo.

(v) Findings

The Inquiry finds, subject to its recommendations:

- impacts on Aboriginal cultural heritage can be appropriately avoided, minimised and managed
- Traditional Owner engagement will be adequate with the requirement for a Traditional Owner Engagement Plan
- a CVA should be prepared in consultation with BLCAC
- culturally significant species can be adequately considered through the CVAs with GLaWAC and BLCAC.

(vi) Recommendations

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) **Amend Section 26.5.3 (Decommissioning) to refer to updating and implementing the Traditional Owner Engagement Plan.**
b) **Amend ACH-M006 (Traditional Owner Engagement Plan) to ensure the 'mitigation outcome' refers to engagement, and to require the measure be applied through all stages of the Project including pre-construction and decommissioning.**
c) **Amend ACH-M002 (Cultural Values Assessment) to require a Cultural Values Assessment be prepared before construction commences in conjunction with Bunurong Land Council Aboriginal Corporation as relevant to the Project.**
d) **Remove references to the "OEI Act" [Offshore Electricity Infrastructure Act 2021 (Cth)].**

10 Onshore construction impacts (noise, vibration, soil and waste)

10.1 Background

The following EES Chapters and technical reports are relevant to onshore construction impacts (noise, vibration, soil and waste):

- Chapter 11 (Soil and Waste)
- Chapter 16 (Onshore Noise and Vibration)
- Technical Report J (Soil and Waste)
- Technical Report W (Onshore Noise and Vibration).

Table 26 shows the relevant Evaluation Objectives.

Table 26 Evaluation objectives – Onshore construction impacts

Impact/effect	Evaluation objective
Water and catchment values	To minimise adverse effects on water (including groundwater, waterway, wetland, estuarine, intertidal and marine) quality and movement.
Community amenity, safety, roads and transport	To avoid, or minimise where avoidance is not possible, adverse effects on community amenity and health and safety, with regard to noise, vibration, dust, the transport network, fire risk management and electromagnetic radiation.

Table 27 shows the relevant legislation, policy and guidelines.

Table 27 Relevant legislation, policy and guidelines – Onshore construction impacts

Legislation	Policy/guidelines
- EP Act - Environment Protection Regulations 2021 - Environmental Reference Standard - Pollution of Waters by Oils and Noxious Substances Act 1986 - Road Management Act 2004	- EPA Publication 1826.5 – Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises, and entertainment venues (Noise Protocol) - EPA Publication 1834.2 – Civil construction, building and demolition guide (EPA Publication 1834.2) - EPA Publication 1856 – Reasonably practicable - EPA Publication 655.1 – Acid sulfate soil and rock - National Environment Protection (Assessment of Site Contamination) Measure 1999

Expert evidence was given by Tom Evans (onshore acoustics) and Mark Davidson (soils and waste) on behalf of the Proponent.

10.2 Onshore construction noise and vibration

(i) The issues

The issues are whether:

- the onshore construction noise and vibration impacts have been appropriately assessed
- acceptable environmental outcomes can be achieved in relation to noise and vibration.

Other noise and vibration issues have been discussed in other chapters of this Report including:

- impacts on threatened fauna (see Chapter 6.4)
- underwater noise (see Chapter 7.4).

(ii) What did the EES say?

The EES assessed the noise impact within a corridor extending 1.5 kilometres from all construction sites including construction compounds, temporary concrete batching plants, the shore crossing and trenchless crossing sites.

Noise modelling was conducted of construction noise at distances typical of the nearest noise sensitive areas and natural areas and for off-site traffic. No noise sensitive educational, community or health facilities are located within the study corridor.

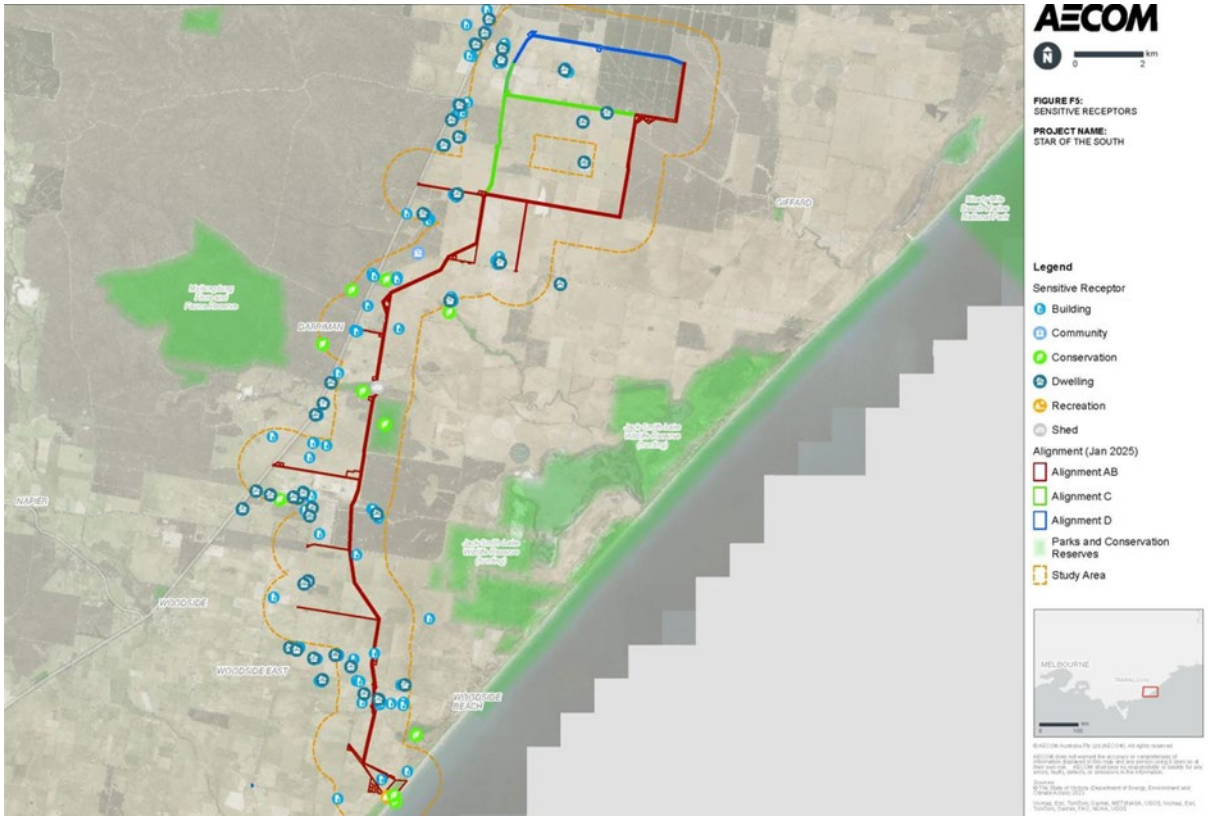
Figure 10 shows the sensitive receptors and noise monitoring locations and Table 28 identifies the number of nearest residential receptors.

The shore crossing (which includes offshore support vessels and associated noise) and other trenchless crossing works would utilise HDD. To avoid the bore hole collapsing, drilling would be continuous until the bore is completed. Each of the onshore cables would require four to six weeks of active drilling typically running 24 hours a day, seven days a week. Unavoidable out of hours works, particularly at the shore crossing site, was identified as having the greatest potential noise impact.

Most construction work would be completed in normal working hours (Monday to Friday 07:00 am to 6:00 pm, and Saturday 07:00 am to 1:00 pm). Mitigation measures specify that a Construction Noise and Vibration Mitigation Plan (CNVMP) would be developed to eliminate or minimise noise and vibration impacts as far as reasonably practicable consistent with the General Environment Duty specified in the Environment Protection Act 2017.

ONV-M002 (Out of hours construction noise mitigation measures) requires a qualified specialist, with skills and expertise in health, safety and the environment as relevant, to review all planned and unplanned night works (10:00 pm to 7:00 am) to ensure that the works are necessary and that all reasonable measures have been taken to mitigate any impacts in accordance with EPA Publication 1834.2.

Figure 10 Sensitive receptors and noise monitoring locations



Source: EES Chapter 16

Table 28 Nearest residential sensitive receptors for the onshore transmission system

Receptor Type	Approximate distance to works (metres)	Number of receptors
Residential buildings	Within 250	35
	250-500	33
	500-1000	65
	1000-1500	40
	Total	206

Source: EES Chapter 16

Temporary concrete batch plants will be established at six locations within the Project area. As works progress, batch plants would be relocated with up to three plants operating at any one time. As temporary concrete batch plants are deemed industrial facilities, noise from the temporary batch plans was assessed against the provisions contained in the Noise Protocol. Noise from the batching plants is expected to meet the relevant Noise Protocol limits.

In regard to cumulative noise impacts arising from other projects, the EES concludes that there is insufficient information or they would be too far away to contribute to onshore construction noise impacts.

The EES concluded that there would be no significant impacts to human health and the environment from onshore noise and vibration.

(iii) Evidence and submissions

Submitters raised issues including:

- continuous noise at Reeves Beach during the shore crossing works affecting residents and campers and causing sleep disturbance
- concern about noise and vibration from construction activities causing damage to buildings and affecting underground services
- general concerns regarding construction noise impacts on local residents.

EPA's submission recommended drafting improvements to the construction noise mitigation measures to ensure they accurately reflect the guidance in EPA Publication 1834.2. EPA did not raise fundamental concerns with the technical aspects of the noise and vibration assessment.

Mr Evans gave written evidence that while construction noise from the shore crossing activities would be audible, the predicted noise levels at the Reeves Beach residential areas would be similar to that of the existing ambient environment. With the closest home being 350 metres from the work site, he estimated that with windows closed, internal noise levels within bedrooms would be expected to be below the level where sleep disturbance may occur. Other homes are over two kilometres from the onshore crossing site are less likely to be impacted.

As the Reeves Beach campground is significantly closer to the construction works than the residential areas, Mr Evans considered the higher noise levels predicted within the campground would cause sleep disturbance. He noted that the higher noise levels would only be for the periods of noisy works closest to the campgrounds. Mr Evans referred to mitigation measure ONV-M002 (Out of hours construction noise mitigation measures) which requires planned unavoidable works, such as the shore crossing, to be detailed in the Construction Noise and Vibration Management Plan.

Mr Evans noted in his evidence that while construction noise would be audible at times, this would likely be limited to periods when noise intensive works are occurring closest to each sensitive receiver. As works move further away from the sensitive receivers, the construction noise levels would decrease. Most works would be scheduled during normal working hours (except justified unavoidable works) in accordance with EPA Publication 1834.2. Mr Evans stated that with implementation of the proposed mitigation measures noise would be minimised so far as reasonably practicable.

In relation to vibrations causing damage to buildings and infrastructure, Mr Evans observed that the safe work distances specified in the EES are for cosmetic damage and are below the levels which would cause structural damage. Mr Evans noted that if vibration intensive works are to occur within this safe work distance then additional mitigate measures as specified in ONV-M003 (Vibration safe working distances) and ONV-M008 (Noise and vibration monitoring) would be employed to mitigate any impact. He said the risk of vibration impact was minor.

The Proponent submitted that there are well developed legislative and guidance frameworks for onshore noise which provide sound frameworks to manage impacts and risks as the project progresses. Practical noise management measures such as those

contained in ONV-M001 (Managing noise and vibration from construction activities) are based on legislation and guidelines.

In response to a question from the Inquiry about whether an environmental auditor should fill the role of the independent expert specified in mitigation measure ONV-M002, the Proponent submitted that environmental auditors may not have the relevant skills and was not necessary to achieve the desired outcome.

(iv) Inquiry assessment

The Inquiry is satisfied that the onshore construction noise and vibration impacts on humans and buildings have been identified and quantified. Relevant noise and vibration legislation, standards and guidelines have been used to evaluate impacts and identify mitigation measures.

The Inquiry accepts the evidence of Mr Evans that the EMF adopts an 'all reasonably practicable' measures approach to mitigating noise or vibration impacts. This approach to control noise and vibration accords with EPA Victoria 1834.2.

The impact at the Reeves Beach campground during the onshore crossing works would be carried out to minimise noise impacts. Drilling at night and in proximity to the campground, however, is expected to cause sleep disturbance for users of the campground. The predicted impacts are based on a worst-case scenario with favourable noise propagation weather conditions.

While shore crossing works will take up to 18 months, each duct installation would require four to six weeks of drilling before the drill rig moves to the next duct installation site which would be approximately 40 metres apart. Mitigation measure ONV-M005 (Unavoidable works - Shore crossing drilling – noise control) describes appropriate controls to minimise noise impacts of the shore drilling and ONV-M001 (Managing noise and vibration from construction activities) requires consultation with Parks Victoria and users of the campground.

The EMF requires contractors to develop and implement a CEMP describing how they will comply with the requirements and mitigation measures specified in the EMF. Many mitigation measures require the development of sub plans to avoid, minimise and mitigate impacts. While many of the sub plans would be approved or reviewed by relevant authorities, the CNVMP would only be reviewed and approved by the Proponent.

Mitigation measure ONV-M002 (Out of hours construction noise mitigation measures) specifies that a qualified specialist would review all night works to ensure the works are justified in accordance with EPA Publication 1834.2 and that all reasonably practicable work practices have been considered to minimise impact.

The EES assessed the initial impact of out-of-hours work as major but with the implementation of mitigation measures the residual impact was assessed as moderate. While the EMF specifies an independent expert would review the justification of night-time works and that all practicable mitigation measures have been implemented, the Inquiry considers that this role would be more suitable for an environmental auditor.

Under Regulation 164(a) of the *Environment Protection Regulations 2021*, an environmental auditor when requested may verify actions and measures to comply with

guidelines issued by the EPA. Reviewing the justification process for night-time works in accordance with EPA guideline 1834.2 and determining what is reasonably practicable to implement for noise control are judgement calls that environmental auditors are able to make.

There are environmental auditors with the required skills to undertake this work. Environmental auditors are accustomed to assessing compliance with EPA guidelines and determining that proportionate controls to mitigate or minimise the risk of impact in compliance with the requirement under the EP Act to take all practicable measures. EPA-appointed environmental auditors can be engaged for non-statutory advisory work. The Inquiry considers an environmental auditor verifying night works is justified in accordance with EPA Publication 1834.2. This would also provide a greater level of confidence to the Proponent when it approves noise management plans rather than relying on a specialist that may not have auditing experience.

(v) Findings

The Inquiry finds, subject to its recommendations:

- the onshore construction noise and vibration impacts have been appropriately assessed
- acceptable environmental outcomes can be achieved in relation to noise and vibration.

(vi) Recommendations

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend ONV-M002 (Out of hours construction noise mitigation measures) to specify that an environmental auditor reviews and verifies that all planned and unplanned night-time works are justified in accordance with EPA Publication 1834.2 and that all reasonable work practices have been considered.

b) Amend ONV-M005 (Unavoidable works – Shore crossing drilling – noise control) to specify an environmental auditor reviews and verifies that all night-time works have been justified in accordance with Section 4.4 of EPA Publication 1834.2, and that all reasonably practicable work practices have been considered.

10.3 Soil and waste

(i) The issues

The issues are whether:

- the impacts from soil and waste from construction activities have been appropriately assessed
- all reasonable mitigation measures are applied to achieve an acceptable environmental outcome in relation to soils and waste.

(ii) What did the EES say?

The EES comprised a desktop contamination assessment of land within 200 metres of the onshore transmission system, together with the footprint of construction compounds and laydown areas[10]. Information was sourced from current and historic land use and existing contamination records (such as EPA records and Statutory Environmental Audit reports) to identify potentially contaminated land.

The vast majority of the onshore underground cable system alignment is (or abuts) land used for farming, plantation forestry and bushland and nature reserve purposes.

The desktop contamination assessment found the historical and existing land uses along the study area have a low potential for broad scale environmental contamination.

Soil sampling within the study area did not find concentrations of contaminants in soil above guideline levels specified in the National Environment Protection (Assessment of Site Contamination) Measure 1999 that would indicate soil contamination.

Mapping information showed the potential for acid sulfate soils to be present in the coastal area and near wetlands. Field investigations indicated that acid sulfate soils are present within coastal lagoon sediments and in alluvial deposits surrounding creek crossings. Contractors would be required to prepare an Acid Sulfate Soil Management Plan outlining best practice measures including treatment options, managing run-off, covering stockpiles and monitoring programs.

Onshore construction activities would generate large quantities of excavated soils, estimated to be up to 761,000 cubic metres. To prevent the underground cables from overheating, thermal backfill material may need to be used where excavated soils do not have the required thermal conduction properties. Reuse or disposal of large amounts of spoil, surplus excavated soil material may be required.

Measures and procedures for the appropriate handling, storage, transportation and disposal of fuels and chemicals and wastes will be specified in the CEMP (SOL-M008).

The EES considered the cumulative effect of multiple projects requiring the disposal of soil in the same regional area. Three projects were identified where there was potential temporal overlap of construction times. The EES found that the cumulative impacts of the relevant future projects can be managed effectively through avoidance, engineering and administrative controls and the potential for adverse cumulative impact is negligible.

With effective implementation of mitigation measures, residual impacts are expected to be negligible to minor and risks low.

(iii) Evidence and submissions

No submissions raised any material concern about soil and waste management. Soil and waste will be managed through standard mitigation measures which are consistent with established legislative and guidance frameworks under the EP Act.

[10] Study area for the contamination assessment

Mr Davidson gave written evidence that no impact, risk descriptions and/or ratings presented in EES Chapter 11 (Soils and Waste) should be changed, qualified or otherwise expressed differently.

Wellington Council identified that local municipal facilities may not be able to handle the anticipated volume of waste that may be produced by the project.

Mr Davidson explained that while disposal sites are not specified, all wastes would be disposed in accordance with legislative requirements. He noted that CEMP would include measures for the appropriate disposal of large quantities of trench spoil and identify appropriate offsite reuse locations.

Mr Davidson noted in his written evidence that the Acid Sulfate Soils Management Plan required by SOL-M005 (Management of Acid Sulfate Soil) would be required to mitigate risks to the environment during transmission line construction. Also, that further assessment of acid sulfate soil would be required prior to construction to identify liming rates or other treatment requirements for this soil.

(iv) Inquiry assessment

The EES assessed the impacts of the project on the management of waste spoil, disturbance of acid sulfate soil and management of chemicals impacting land, surface waters and groundwaters as negligible to minor impact and a low risk rating. The Inquiry agrees with this assessment.

Soil and waste impacts will be managed through SOL-M008 (Management and disposal of spoil) which provides for management of spoil to be incorporated into the CEMP. The CEMP includes mitigation measures for managing drilling fluids (SOL-M006) and requires contractors to prepare an Acid Sulfate Soils Management Plan (SOL-M005).

The Inquiry accepts that an Acid Sulfate Soil Management Plan (ASSMP) is important to ensure acceptable environmental outcomes are achieved. While most plans required to be developed under the EMF would be reviewed or approved by the relevant authorities, the Proponent would be responsible for approving the ASSMP. Mitigation measure SOL-M005 identifies that the ASSMPs would be prepared in accordance with:

- EPA Publication 655: Acid Sulfate Soil and Rock
- Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soil
- National Acid Sulfate Soil Guidance: Sampling and Identification Methods Manual
- National Acid Sulfate Soil Guidance: Identification and Laboratory Methods Manual
- National Acid Sulfate Soil Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments.
- Australian Standards 4969 Analysis of Acid Sulfate.

Under Regulation 164(a) of the *Environment Protection Regulations 2021*, an environmental auditor when requested may verify actions and measures to comply with guidelines issued by the EPA. EPA appointed environmental auditors can be engaged for non-statutory advisory work. The Inquiry considers that an environmental auditor, in

non-statutory role, should verify any ASSMP prepared for the project accords with the relevant guidelines. This verification would also provide assurance to the Proponent that management of acid sulfate soils in accord with the ASSMP would not result in unacceptable environmental outcomes.

The Inquiry considers the impact pathway is conventional and with an environmental auditor approving acid sulfate soil management plans, the proposed controls on soils and waste are consistent with established environmental management practice, including relevant regulatory requirements and/or recognised industry guidance.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the impacts from soil and waste from construction activities have been appropriately assessed
- all reasonable mitigation measures are applied to achieve an acceptable environmental outcome in relation to soil and waste.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend SOL-M005 (Management of Acid Sulfate Soil) to require the Acid Sulfate Soils Management Plan be prepared prior to construction, implemented during construction, and be reviewed and verified by an environmental auditor as complying with the relevant guidelines and legislation.

PART C: OTHER VICTORIAN MATTERS

11 Business and tourism

11.1 Background

The following EES Chapters and technical reports are relevant to business and tourism:

- Chapter 12 (Agriculture and Forestry)
- Chapter 21 (Business and Tourism)
- Chapter 25 (Commercial and Recreational Fisheries in Victorian waters)
- Technical Report N (Commercial and Recreational Fisheries)
- Technical Report Q (Business and Tourism)
- Technical Report S (Agriculture and Forestry).

Table 29 shows the relevant Evaluation Objective.

Table 29 Evaluation objective – Business and tourism

Impact/effect	Evaluation objective
Land use and socioeconomic	To avoid and minimise adverse effects on land use, social fabric of the community, local infrastructure, and local businesses and tourism during construction, operation and decommissioning of the project.

Table 30 shows the relevant legislation, policy and guidelines.

Table 30 Relevant legislation, policy and guidelines – Business and tourism

Legislation	Policy/guidelines
PE Act	Planning Scheme

11.2 Local businesses

(i) The issues

The issues are whether:

- the EES adequately identifies and assessed impacts on local businesses
- impacts can be appropriately minimised and managed, and are acceptable.

This Chapter deals with impacts on local businesses including labour workforce market. Other impacts on local businesses are discussed in other Chapters including:

- agriculture and forestry at Chapter 11.3
- commercial and recreational fisheries at Chapter 11.4
- construction traffic at Chapter 14.1
- construction noise on Reeves Beach campground at Chapter 13.3
- workforce housing and accommodation at Chapter 13.1.

(ii) What did the EES say?

The EES assessed the impacts of the Project on local and regional businesses, including local labour workforce and economic activity.

The local study area, broadly covering the area around the transmission easement from Foster to Yarram and the nearby coast, is characterised by farming, forestry and small

towns. Small businesses comprise 92 percent of businesses in the study area. The regional study area covered the broader Latrobe-Gippsland region.

The EES assessment criteria focussed on whether:

- the net income of directly affected businesses would be unduly adversely affected
- regional output and employment would be reduced
- opportunities to increase regional output and employment would be maximised
- the capacity of the region to accommodate further investment and jobs would be diminished.

The EES considered impacts at two scales, including impacts on individual business incomes, and regional output and employment. It considered the existing business and employment profiles, the workforce required for the Project and the direct and indirect employment and economic activity expected to be generated.

The EES found that while the Project would generate positive regional employment outcomes, it could compete with existing businesses for workers, particularly in smaller local labour markets. Some businesses may have difficulty attracting or retaining workers and face upward pressure on wages. The EES recognised that impacts would not necessarily be felt uniformly across all businesses.

The EES estimated the Project could require up to 3 percent of the regional construction workforce at some stages. It recognised the availability of workers would depend on other projects and general construction demand and that some workers could be drawn from existing local employment.

The EES acknowledged that some hospitality and tourism businesses may experience adverse effects of reduced turnover if construction deters visitors even though overall visitation and adverse regional economic effects are expected to be limited.

The residual impact of disruption to the local and regional labour market was assessed as minor. The EES proposed that labour market impacts be managed principally through the Workforce Development Strategy (BTM-M005) directed at maximising participation by Gippsland businesses and workers.

The EES found that overlapping construction of other major projects could result in significant competition for workers, particularly for specialist skills, potentially increasing wages and drawing workers away from local industries. The extent of the impact was uncertain because of uncertainty in project timing and workforce requirements. Technical Report Q recommended coordinated implementation of mitigation measures with other project proponents and relevant authorities to manage cumulative impacts on labour.

(iii) Submissions

Wellington Council sought to ensure the potential impacts and benefits for local businesses and industries were appropriately managed.

Wellington Council raised concerns that the Project's workforce demand may increase competition for labour and contribute to worker shortages for local businesses. It was concerned that the assessment of broader regional economic benefits did not sufficiently demonstrate how benefits and adverse impacts would be experienced at the local and individual business scale.

At the same time, Wellington Council supported maximising local employment and training opportunities and considered the Workforce Development Strategy should also:

- monitor and evaluate potential impacts on existing industries, including worker shortages
- prioritise employment of local communities and procurement of local companies to improve benefits at the local level.

It wanted a Local Procurement Strategy as a standalone management plan to provide sufficient clarity about how local procurement would be implemented.

The Proponent submitted the Project may temporarily constrain the local labour supply, resulting in higher wages and a reduced workforce pool for some businesses. It said the minor residual impact rating reflected a balance between adverse effects on individual businesses, increased local demand for goods and services from the Project workforce and broader positive regional economic effects.

The Proponent did not agree with Wellington Council that a standalone Local Procurement Strategy was required and instead made changes to BTM-M006 (Workforce Accommodation Strategy) to strengthen requirements for local workforce participation and procurement opportunities in the Workforce Development Strategy. Wellington Council supported these changes, notwithstanding its preference for a standalone Local Procurement Strategy.

(iv) Inquiry assessment

Overall, the Inquiry is satisfied that impacts on local businesses can be appropriately minimised and managed.

Regional economic indicators are relevant to understanding the broader economic significance of the Project. The Project will contribute to a positive regional economic impact generally by generating:

- regional economic activity and employment
- a sizeable workforce population and increased regional expenditure.

However, regional economic indicators do not necessarily reflect the significance of impacts felt by individual businesses and positive regional employment and economic impacts do not necessarily offset adverse impacts on individual businesses. While the EES demonstrates the Project is unlikely to have a significant adverse impact on the regional labour market overall, there is less certainty about the significance of impacts on local individual businesses. An increase in regional employment and business activity do not necessarily offset higher labour costs or challenges in recruiting that individual businesses could face. Impacts from Project recruitment could affect the ability of

existing local businesses to recruit or retain workers, particularly in sectors or locations with already constrained labour markets.

The scale of impact is tempered by the relatively limited workforce associated with the Project. The projected demand of 3 percent of the regional construction workforce at peak periods is unlikely to cause widespread or significant disruption to the regional labour market, though impacts may be greater for individual businesses or smaller local labour markets. These more localised impacts warrant specific management.

There is an inherent tension between maximising local employment opportunities from the Project and minimising competition for workers from existing local businesses.

BTM-M005 (Workforce Development Strategy) is intended to identify Project workforce needs and maximise participation by Gippsland firms and workers. However local participation should be sought in a way that does not exacerbate existing local shortages or adversely affected local businesses.

The Proponent's changes to the BTM-M005 requirements around local workforce participation and procurement are accepted. These changes are sufficient to guide local procurement outcomes. There is no demonstrated need for a standalone Local Procurement Strategy is not necessary.

However, BTM-M005 does not currently require potential competition for local workers to be addressed. To avoid and minimise such impacts, BTM-M005 should be amended to add a requirement to minimise competition for workers in areas or occupations experiencing labour shortages. Technical Report Q discusses ways to achieve this, including workforce training and recruitment from outside the affected labour market, which can be developed as part of consultation on the strategy with Wellington Council and other relevant stakeholders as required by BTM-M005. Subject to this recommended change, the residual impacts are acceptable.

Cumulative impacts are difficult to predict given the uncertainty regarding the workforce requirements and timing of other major projects. There is potential for cumulative workforce demand to place material strain on the labour market if major projects overlap. This is particularly the case for specialist construction skills and in smaller local labour markets where the EES found potential for high competition for workers.

The EES refers to the development of the Victorian Energy Jobs Plan by the Victorian State Government to manage cumulative impacts. No project-specific measures are recommended. While the Victorian Energy Jobs Plan will provide an important State-wide response to increasing workforce demand to deliver renewable energy projects, it does not remove the need for project-specific measures to manage the impacts of the Project overlapping with other major projects. BTM-M005 should be updated to require the Workforce Development Strategy to consider and manage cumulative impacts.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the EES adequately identifies and assesses impacts on local businesses
- local business impacts can be appropriately minimised and managed and are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend BTM-M005 (Workforce Development Strategy) to require minimisation of local labour workforce competition and consider cumulative impacts on the workforce demand and measures to reduce impacts on local businesses if required.

11.3 Agriculture and forestry

(i) The issues

The issues are whether:

- the EES adequately identifies and assessed impacts on agriculture and forestry
- those impacts can be appropriately minimised and managed, and are acceptable.

(ii) What did the EES say?

The EES identified agriculture and forestry as significant contributors to the Gippsland economy. Potential impacts of the Project on these businesses included loss of production, flow-on effects on regional processors and changes in regional employment.

Economic impacts were principally assessed by comparing estimated production losses with local and regional production levels, while other impacts were assessed having regard to the degree of disruption to individual farm and plantation forestry operations.

The EES found that construction of the Project would result in temporary agricultural production losses and the exclusion of plantation forestry from the transmission easement. Although estimated production losses are small relative to regional or State production, the EES recognised that they may be significant for individual affected businesses.

With mitigation, residual impacts on agricultural and forestry businesses were generally assessed as negligible to minor. Some temporary disruption to individual businesses may remain during construction, including from restricted access and interference with farming or forestry operations, while longer-term effects may arise where land is permanently occupied or subject to operational restrictions. Biosecurity risks were assessed as having potentially greater consequences, but a very low likelihood with mitigation.

For plantation forestry, the construction and operation of the transmission easement would permanently exclude affected plantation land from forestry production, resulting in the loss of one production rotation over the life of the Project. Affected operators would be compensated for production losses however the land would remain unavailable for plantation and residual impact was assessed as moderate.

At the property scale, the greatest potential for cumulative impacts were on forestry, where multiple projects require the same forestry estates, resulting in incremental loss of productive plantation land. Cumulative impacts on individual agricultural properties were considered less likely because affected properties would generally not be subject to concurrent impacts from multiple projects.

Mitigation measures in the Final Day EMF include:

- AGM-M002 (Preparation of landholder specific Property Management Plans) (PMPs) for affected agricultural and plantation forestry properties, addressing property-specific construction and operational requirements, including risk management measures and an independent agricultural specialist to review and verify implementation of the PMPs
- AGM-M001 (Compensation for economic impacts) provides for farmers and plantation operators to be compensated for economic losses directly resulting from the Project, including a process to identify and quantify specific losses and seek independent expert advice to resolve disputes about valuation
- AGM-M005 (Biosecurity Management Plan) requires agriculture and forestry-specific biosecurity procedures to be developed to industry standards, in consultation with agricultural specialists, landholders and Agriculture Victoria, including requirements for monitoring, auditing and enforcement.

(iii) Submissions

DEECA considered the EES and EMF provided a structured approach to managing agricultural impacts but was concerned that they relied heavily on Proponent-led systems, future plans and regional-level analysis. It submitted this may not provide sufficient assurance that outcomes would be achieved at the individual property level.

DEECA was particularly concerned that regional-scale effects could mask significant impacts on individual farm businesses and that the assumed restoration of agricultural productivity was not supported by defined benchmarks or verification. It recommended the EMF be strengthened to:

- provide independent auditing, with agricultural expertise, of soil, biosecurity, rehabilitation and land productivity outcomes
- better address and verify impacts at the individual property level, including production, farm operations and long-term land capability
- require landholder consultations and monitoring, auditing and enforcement for biosecurity management plans
- establish clear, measurable benchmarks for rehabilitation and recovery timelines for soil condition, pasture performance and land capability.

DEECA submitted that the proposed biosecurity framework was likely to reduce risks under typical conditions but that framework relied on consistent implementation across contractors and properties.

Wellington Council supported the PMPs as a tool to manage impacts on farming and biosecurity risks. It submitted monitoring frequency of rehabilitation measures should be

based on seasons rather than annual timeframes, and sought a complaints mechanism for the duration of construction.

Hancock Victorian Plantations submitted that while the Project would result in relatively minor impacts from its plantations, greater consideration should be given to the cumulative impacts of multiple renewable energy projects on landowners.

The Proponent submitted that impacts on agriculture and forestry could be appropriately managed through the EMF and property-specific arrangements, particularly the PMPs developed in consultation with affected landowners. It relied on these plans, together with compensation, rehabilitation and biosecurity measures to manage impact on individual properties.

It advised that consultation with affected landholders commenced in 2020 and informed selection of the preferred cable corridor, alignment selection, assessment of impacts on farming and forestry operations, compensation offers and land access and tenure arrangements. It said engagement would continue through all project phases, and the PMPs would enable a complaints mechanism through dedicated Project representatives.

In response to DEECA's and Wellington Council's submissions, the Proponent amended the Final Day EMF at:

- AGM-M002 to require an independent agricultural specialist to review and verify implementation of the PMPs
- AGM-M005 and related FFM-M007 (Biosecurity Management Plan) to strengthen biosecurity requirements, including monitoring, auditing and enforcement, pest surveys and risk assessment
- FFM-M013 (Rehabilitation and Reinstatement Plan) so that monitoring frequency would consider high-risk weed cycles.

DEECA supported the changes relevant to its concerns and raised no further concerns. Wellington Council also supported the relevant changes.

(iv) Inquiry assessment

Overall, the Inquiry is satisfied that impacts on agriculture and forestry can be appropriately minimised and managed. While the EES assesses impacts in regional economic terms, the EMF includes measures to manage site-specific impacts, including PMPs, and to provide compensation for direct economic losses.

The disruption to individual farm and forestry operations can be appropriately managed. The Final Day EMF requires the PMPs be prepared in consultation with landowners and address a range of land and operational matters. It provides an appropriate framework to manage rehabilitation and biosecurity risks on properties, and provides an adequate process for complaints, including:

- tying rehabilitation to documented baseline conditions and property-specific requirements, with independent verification of implementation
- requiring property-specific biosecurity measures, consultation and verification steps.

These measures provide an appropriate level of assurance that impacts can be effectively managed at the individual property level.

The Proponent's change to require an independent agricultural specialist to review and verify the implementation of AGM-M002 (PMPs) as reflected in the Final Day EMF was supported by DEECA and is supported by the Inquiry. This process provides an additional level of assurance that the anticipated mitigation outcomes can be achieved at the individual property level. The residual impacts on agriculture and forestry are considered acceptable within this context, noting impacts at the individual property level may be greater than regional impacts.

The EES assessment that cumulative impacts are unlikely to be material at a regional scale is accepted. The EES does not however establish potential impacts on individual landowners and businesses. This issue warrants ongoing consideration as other renewable energy projects develop within the Gippsland REZ. The Project's contribution to such impacts can be managed through the proposed EMF measures for property-specific consultation and management.

(v) Findings

The Inquiry finds:

- the EES adequately identifies and assesses impacts on agriculture and forestry
- impacts can be appropriately minimised and managed, and are acceptable.

11.4 Commercial and recreational fisheries

(i) The issues

The issues are whether:

- the EES adequately identifies and assessed impacts on commercial and recreational fisheries
- those impacts can be appropriately minimised and managed, and are acceptable.

Chapter 7 discusses impacts on fish and invertebrates as relevant to marine environment/ecological processes.

(ii) What did the EES say?

The EES assessed the potential impacts of the Project on commercial and recreational fishing, including activities and potential impacts on fishing and target fish species.

The EES considered commercial fishers using restrictive and non-restrictive fishing methods, charter fishing operators and recreational fishers on private vessels. Potential effects include temporary restrictions on access to fishing grounds, loss of catch, increased operating costs, displacement to other fishing areas and changes in the availability of target fish species.

The EES considered available catch and effort data, baseline fish surveys and consultation with commercial and recreational fishing stakeholders.

The EES stated highly productive fishing grounds, popular recreational fishing areas and sensitive ecological features providing fish habitat were considered in site selection.

The EES identified several commercial and recreational fisheries receptor group impacts. During construction, the most significant impact is the potential temporary loss of fishing grounds for commercial fishers using restrictive fishing methods, which is assessed as moderate before mitigation. Operational impacts principally relate to the presence of Project infrastructure and its potential interaction with fishing activities. Following mitigation, the assessed residual construction and operation impacts were generally negligible. The residual impact ratings in the EES were derived from activities and impacts associated with the Overall Project and are described as conservative in the context of the Victorian works.

Mitigation measures relating to fisheries include:

- SOC-M003 (Stakeholder Engagement Plan) for consultation and notification
- CRF-M08 (Fisheries Liaison and Coexistence Plan) for compensation
- CRF-M09 (Local industry participation) for work opportunities
- Specific measures for ensuring cable burial SNV-M04, MEMP-M09 and EMI-M01.

An overarching fisheries related mitigation measure CRF-M08 requires preparation of a Fisheries Liaison and Coexistence Plan, which sets a hierarchical management approach. It first seeks to share the waters, then consider alternative arrangements where coexistence is not practicable, and finally provide compensation where impacts cannot otherwise be avoided. The plan will form a sub-plan of both the CEMP and OEMP.

The EES found there is potential for cumulative impacts on commercial and recreational fishers if other offshore wind projects proceed. Impacts principally relate to cumulative loss of and displacement from fishing grounds, noting impacts from the Commonwealth works are mostly rated negligible. The extent of such impacts is uncertain given the unknown scope of other wind projects.

(iii) Submissions

Mitchelson Fisheries, a family-run seafood-based business with a 50-year history, submitted the Project would disrupt its fishing operations and could have broader consequences for seafood businesses. It was particularly concerned about the ability to continue Purse Seine fishing, a method potentially incompatible with exposed subsea infrastructure. It submitted the export cables would not present an issue if sufficiently buried, but expressed concern about maintaining sufficient burial given tidal influences. Further, it sought continued access to fishing grounds, compensation where access cannot be maintained, or a combination of both.

SIV submitted the EES underestimated impacts on commercial fisheries, including by relying on the proportion of historically fished areas, and a precautionary approach should be adopted. It considered the assessment did not adequately account for:

- the importance and changing use of particular fishing grounds
- displacement and associated business costs

- safe operation around cables
- potential changes in species catchability
- uncertainty regarding electromagnetic field effects.

Several submitters raised issues about the loss of access to traditional fishing grounds and effects on commercial and recreational fishing opportunities, including concerns that compensation would not replace access to productive fishing areas. Some submitters expressed concern that tourism operators would be impacted by reduced access to berths.

One submitter supported offshore wind and considered associated infrastructure stating it could provide habitat and improve fisheries productivity.

Dr Provis gave evidence that the highly mobile soft sandy seabed of the inshore areas meant the cables would generally be buried or self-buried (as discussed in Chapter 8).

The Proponent explained CRF-M08 (Fisheries Liaison and Coexistence Plan) will be prepared for the Overall Project as a cross-jurisdictional document and sub-plan of the CEMP and OEMP. The plan would address consultation and fisheries liaison, coexistence and mitigation measures, management of gear-snapping incidents, the compensation framework and calculation methodologies, and commercial opportunities for fishers.

The Proponent submitted that fishing access impacts could be reduced through communication, notification and consultation about construction scheduling. Where coexistence is not safe or practical, secondary mitigation measures (of which there are several) include:

- compensation (available across all phases of the Project)
- Project employment opportunities for commercial fishers.

Regarding export cables, the Proponent submitted:

- installation would be progressive, transient and temporary
- cables would be buried beneath the seabed and rock protection used only where cables cannot be buried to target depths
- Purse Seine fishing methods are expected to remain feasible over most of the export cable area.

Regarding access to boat launching facilities, the Proponent submitted existing facilities would not be directly affected by the Project. Recreational fishers would continue to have access to other popular fishing grounds, including Corner Inlet, the nearshore waters of Ninety Mile Beach, Wilsons Promontory and nearby island chains.

(iv) Inquiry assessment

The Inquiry is satisfied that the impacts on commercial and recreational fisheries have been appropriately assessed and can be appropriately minimised and managed, subject to some refinements to the Fisheries Liaison and Coexistence Plan (CRF-M08).

Relevant measures in the EMF include:

- notification regarding vessel movements and safety zones, including frequent updates on changes during construction

- stakeholder engagement on construction sequencing
- advance notice of planned activities
- opportunities for commercial fishers to work on the project
- a compensation process for impacted commercial fisheries where coexistence is not safe or practical and other options to mitigate have been exhausted.

The proposed mitigation measures provide an appropriate framework to minimise the risk of exposed export cables and manage any instances of inadequate burial or exposure. Measures where cables are inadequately buried including preparing a remedial burial strategy (noting Dr Provis expected that cables in soft sandy seabeds would generally be buried or self-buried). SNV-M09 (Charting of final layout on navigational charts) requires the final layout of the Project infrastructure to be charted, enabling fishers to avoid the infrastructure where necessary.

The Inquiry agrees with submitters that the scope of eligible compensable impacts should extend beyond loss or damage to fishing gear. Loss of access or displacement may have flow-on effects and increase operating costs, including fuel and labour costs, and should be considered for compensation.

Changes in fish behaviour or distribution could affect catchability without necessarily changing overall fish stocks. To the extent these changes are attributable to the Victorian works and result in demonstrable economic impacts on commercial fishers, the Fisheries Liaison and Coexistence Plan should provide a mechanism for these impacts to be considered.

The hierarchical approach of the Fisheries Liaison and Coexistence Plan is sound and suitably recognises that reasonable measures for coexistence should be explored before compensation is considered. That said, the EMF provides insufficient detail about implementation of the plan including its relationship with the CEMP and OEMP. Without further guidance, the mitigation may not achieve the intended outcome. The following parameters should be required of the CRF-M08 Fisheries Liaison and Coexistence Plan, specific to the Project:

- consultation with affected commercial fishers on the timing, location and duration of activities that may restrict fishing
- identification of opportunities to minimise interference with fishing activities
- advance notification of temporary restrictions
- arrangements for compensation, including eligibility, categories of compensation, assessment of claims and dispute resolution.

The Fisheries Liaison and Coexistence Plan should be:

- prepared before construction commences
- implemented during construction and operation
- incorporated into (or referenced by) the CEMP and OEMP as relevant.

The Inquiry accepts that existing boat launching facilities would not be directly affected by the Victorian works and that alternative fishing grounds would remain accessible. It considers that impacts on recreational fishing access would be limited and manageable.

While cumulative impacts on fishing activity may arise where other projects overlap or spatially or temporally with the Project, the consultation measures in the EMF provide a mechanism to identify and respond to these impacts.

The Inquiry is satisfied:

- impacts on recreational fishing will be limited, and notification can address any temporary restrictions
- the adaptive management measures proposed in the EMF are sufficient to manage any cumulative impacts.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the impacts of the Victorian works on commercial and recreational fisheries have been appropriately assessed
- impacts associated with temporary access restrictions and the offshore export cables can be appropriately minimised and managed
- overall impacts can be appropriately minimised and managed, and are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend CRF-M08 (Compensation for impacted commercial fishers) and specifically the Fisheries Liaison and Coexistence Plan, by clarifying when the plan applies, how it relates to the other management plans, the notification requirements and parameters for the compensation process.

12 Groundwater and surface water

12.1 Background

The following EES Chapters and technical reports are relevant to groundwater and surface water:

- Chapter 9 (Groundwater)
- Chapter 10 (Surface Water)
- Technical Report H (Groundwater)
- Technical Report I (Surface Water).

Table 31 shows the relevant Evaluation Objective.

Table 31 Evaluation objective – Groundwater and surface water

Impact/effect	Evaluation objective
Water and catchment values	To minimise adverse effects on water (including groundwater, waterway, wetland, estuarine, intertidal and marine) quality and movement.

Table 32 shows the relevant legislation, policy and guidelines.

Table 32 Relevant legislation, policy and guidelines – Groundwater and surface water

Legislation	Policy/guidelines
- Catchment and Land Protection Act 1994 - EP Act - Water Act	N/A

12.2 Clause 43 matters

The Inquiry considers the following matters are appropriately dealt with under Clause 43 of the Terms of Reference and do not warrant detailed assessment.

Table 33 Matters excluded from detailed assessment

Issue	Inquiry determination and comments
Ground water	The EES assessed potential effects on groundwater levels, quality, recharge and flow, groundwater users and GDEs. Issues associated with habitat loss and degradation relating to GDE's are discussed in Chapter 6.6 of this Report. The principal potential groundwater effects relate to: - temporary groundwater drawdown associated with construction dewatering - potential saline intrusion near the coast - damage or loss of existing groundwater wells - contamination of groundwater through poor quality overland flow entering excavations or the disturbance and dewatering of acid sulfate soils - changes to groundwater flow associated with subsurface infrastructure and trench backfill. The assessment identified a residual impact of negligible to minor, having regard to the sensitivity of the receptor (groundwater) and the likelihood and magnitude of the risk.

Issue	Inquiry determination and comments
	The cumulative impact assessment found there would be no cumulative impacts from other major projects and the Victorian works given the highly localised effect of subsurface infrastructure on groundwater flow. The impacts would be managed through a set of mitigation measures including those which: - manage the impact of construction on existing water supply wells (GWM -M002) - provide for replacement of lost or damaged wells (GWM -M002) - prevent impacts to groundwater quality from excavation and dewatering of acid sulfate soils (GWM-M003) - prepare a decommissioning environmental management plan (FFM-M012). Some mitigation measures dealing with surface water impacts are also relevant to the management of groundwater impacts. The Inquiry considers the impact pathway is conventional and that the proposed controls are generally consistent with established environmental management practice, including relevant regulatory requirements and/or recognised industry guidance. No submissions or other material before the Inquiry identified matters that would materially alter the EES assessment.
Surface water	The surface water assessment considered effects on water quality and flood risk, including changes to flood extent, depth, duration or hazard. Potential surface water impacts arise principally during construction from waterway crossings, runoff, spills, dewatering, disturbance of acid sulfate soils and works in flood-prone areas. The greatest potential impacts are at Reeves Beach shore crossing due to proximity to downstream environmental values, including the Corner Inlet Ramsar Site. The assessment identified a residual impact of minor or negligible, having regard to the temporary, localised and minor impacts from trenched waterway crossings and construction runoff, the sensitivity of downstream receiving waterways and the magnitude of the risks. A cumulative impact included potential impact on waterway quality and flows for a small number of waterways near Giffard West from the VicGrid and Great Eastern Offshore Wind Farm projects. Subject to the implementation of mitigation measures, any impacts were considered unlikely. Surface water impacts would be managed through a set of mitigation measures (SUM-M001 to SUM-M014) relating to flood risk management, surface water and hydrology impacts, water quality protection, spill and contamination prevention, acid sulfate soil management, dewatering impacts, and climate change resilience and hydrology impacts from permanent infrastructure removal. The Proponent made changes to the mitigation measures, supported by WGCMA, including drafting matters and reference to the Guidelines for Development in Flood Prone Areas (WGCMA, 2020). The Inquiry supports these changes as shown in its recommended EMF (Appendix H). The Inquiry considers the impact pathway is conventional and that the proposed controls are generally consistent with established environmental management practice, including relevant regulatory requirements and recognised industry guidance. No submissions or other material before the Inquiry identified matters that would materially alter the EES assessment.

13 Social

13.1 Background

The following EES Chapters and technical reports are relevant to social matters:

- Chapter 20 (Social)
- Technical Report R (Social Impact Assessment)
- Technical Report Q (Business and tourism).

Table 34 shows the relevant Evaluation Objective.

Table 34 Evaluation objective – Social

Impact/effect	Evaluation objective
Land use and socioeconomic	To avoid and minimise adverse effects on land use, social fabric of the community, local infrastructure, and local businesses and tourism during construction, operation and decommissioning of the project.

Table 35 shows the relevant legislation, policy and guidelines.

Table 35 Relevant legislation, policy and guidelines – Social

Legislation	Policy/guidelines
PE Act	- Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria (DELWP, July 2021) (Community Benefit Guidelines) - Planning Scheme

13.2 Workforce accommodation

(i) The issues

The issues are whether:

- impacts from construction workforce demand on local accommodation can be appropriately avoided, minimised and managed
- the residual impacts are acceptable.

Issues relating to local businesses are discussed in Chapter 11.2.

(ii) What did the EES say?

The Project is expected to generate a construction workforce of around 377 workers, some of whom may need to relocate temporarily or permanently to Gippsland. The workforce associated with the Commonwealth works would be additional to this.

The EES identified the housing market in the study area[11] as relatively small, particularly in the coastal settlements, with limited rental supply and limited capacity to absorb a

[11] The study area includes the municipalities of Wellington Shire, South Gippsland Shire and Latrobe City within a 60-minute drive catchment of the location of work.

substantial influx of workers. It assessed the potential effects of the Project workforce on housing availability and affordability, size and location of the construction workforce, likely proportion of locally recruited and imported workers, existing accommodation supply and capacity of local services.

The assessment concluded, if unmitigated the disruption to the housing and accommodation market will be moderate.

The proposed mitigation measure is a Workforce Accommodation Strategy (WAS) and a draft version was included in Technical Report R which:

- includes a hierarchy of measures including reducing peak demand, local workforce recruitment, capped use of existing rental and short-stay accommodation and provision of alternative or project-specific temporary accommodation where required
- proposes monitoring of projected and actual workforce accommodation use and housing availability, with further measures in the accommodation hierarchy to be implemented where impacts are identified.

The EES proposed a limit of 25 percent of available short-stay accommodation supply for use by the Victorian works workforce.

The EES concluded the residual impacts on the local housing and accommodation market are minor to moderate.

Technical Report R assessed the broader social impacts of workforce accommodation demand on housing availability and affordability, short-stay accommodation users and community services. It concluded the social impacts would minor to negligible after mitigation, a rating which relied on the assumption that the final WAS would be binding and effective in capping the Overall Project's (not just the Victorian works') use of existing accommodation.

The EES considered cumulative demand from other major projects and relied on the WAS being sufficiently adaptive to respond to changes in regional workforce and accommodation demand.

The EMF requires a WAS be developed, updated and implemented, in collaboration with relevant councils and accommodation providers, prior to construction in SOC-M001 (WAS) and BTM-M006 (WAS). The EMF requires the draft WAS to be finalised prior to construction and requires regular review and monitoring. The EMF does not specify the any accommodation limit, thresholds for management action or contingency measures.

(iii) Submissions

Workforce accommodation impacts were principally raised by Wellington Council and South Gippsland Council, as well as some community submitters.

Wellington Council submitted the municipality already has significant rental and housing stress, particularly in smaller coastal communities. It submitted the WAS did not

adequately address these pressures, noting existing rental shortages and very low vacancy rates in parts of the municipality. It said:

- prioritising use of existing rental or short-term stay accommodation ahead of temporary worker accommodation could worsen existing housing pressure and reduce tourist accommodation, particularly in coastal towns and during peak periods
- a clear mechanism for monitoring and responding to the 25 percent threshold was lacking.

Wellington Council requested:

- greater reliance on temporary worker housing rather than it being a last step in the accommodation hierarchy
- regular monitoring and reporting of short-term rental availability to manage market saturation before it occurred
- a process for ensuring the 25 percent threshold on the Project's workforce use of accommodation is not exceeded, with timelines that allow approval and delivery of temporary accommodation before additional capacity is required
- the EMF require the draft WAS be developed, approved, monitored, implemented in consultation with Council.

South Gippsland Council said there is a significant shortfall in housing to accommodate rapid increases in new workforces or population. It said the Project may increase pressure on local housing and accommodation and sought an appropriate contribution framework to support councils and communities in responding to these impacts.

One submitter expressed concern about an already constrained and unaffordable housing market, and the risks of homelessness and displacement.

The Proponent submitted the potential Project impacts on the local accommodation would be appropriately managed through the WAS, secured through the EMF. It said the Victorian works were unlikely to materially affect housing supply.

In response to Wellington Council's submission, the Proponent amended mitigation measures SOC-M001 (WAS) and BTM-M006 (WAS) to provide for the consultation with relevant Councils (and accommodation providers) in the development, approval, monitoring and implementation of the WAS. Council subsequently accepted the additional consultation requirement in SOC-M001.

In response to questions from the Inquiry the Proponent submitted:

- the EES assessment was conservative because it considered the workforce for the Overall Project, whereas the Victorian works would have a peak workforce of 377 full time equivalent workers and greater potential to source workers locally
- the WAS would manage accommodation impacts through a hierarchy that prioritises reducing demand and using existing accommodation within the proposed 25 per cent limit, before additional accommodation supply is provided
- it is not expected that temporary accommodation will need to be developed for any aspect of the Overall Project let alone the Victorian works but has been included as contingency
- the triggers for progressing through the hierarchy cannot yet be specified and will be determined when the WAS is finalised, and will consider workforce

requirements, accommodation monitoring and surveys, and accommodation availability at the time
- monitoring may include regular reporting on the short-term rental availability to avoid saturation of the market before it occurs
- monitoring will consider cumulative demand from other projects, with effective mitigation also relying on coordination with other projects and relevant authorities
- implementation of the Workforce Development Strategy would simultaneously manage broader impacts of workers on local communities, including demand for community services.

(iv) Inquiry assessment

Subject to amending what the EMF requires for the WAS, impacts from the Victorian works construction workforce demand on local accommodation can be appropriately avoided, minimised and managed, and residual impacts are acceptable.

The draft WAS sets out the substantive approach to managing workforce accommodation impacts, while the EMF establishes requirements for its development, implementation, monitoring, review and reporting prior to construction. The draft WAS demonstrates an appropriate approach to managing accommodation impacts, but the EMF must provide sufficient requirements to ensure that approach is effectively implemented.

The WAS is an appropriate tool to manage impacts on worker accommodation and is supported by an appropriate broader approval framework with complementary management measures. The draft WAS includes measures that would minimise workers requiring accommodation that are a reasonable response to the context.

The draft WAS included a hierarchical mitigation approach which appropriately:
- prioritises avoiding accommodation demand in the first instance
- places limits on reliance on existing accommodation
- allows additional capacity to be created
- provides an escalation pathway to temporary accommodation
- allows the response to reflect actual workforce and accommodation conditions.

The EMF does not prescribe the detailed implementation for the WAS. The Inquiry accepts there is uncertainty about how and when the hierarchy will be progressed because key factors are not yet known including:
- actual workforce numbers and local recruitment levels
- accommodation availability when construction occurs and progresses
- accommodation demand generated by other major projects.

These factors will inform:
- triggers for progressing through the hierarchy
- appropriate numerical thresholds.

Consequently, the WAS needs to remain responsive to actual workforce demand and accommodation market conditions which justifies not prescribing implementation detail in the EMF. Greater certainty is considered necessary however, to ensure the WAS will be

implemented and remain effective throughout construction. The Inquiry recommends the WAS requirements be updated to establish a framework for implementation including:

- monitoring, review and reporting requirements
- thresholds or triggers for actions
- contingency measures to respond to situations where impacts are greater than planned (including cumulative workforce accommodation demand from other major projects)
- clear limits on the use of existing accommodation, with specific caps to be established through the WAS rather than prescribed in the EMF
- consultation with relevant Councils and accommodation providers in developing, updating and implementing the WAS, as amended by the Proponent.

The Inquiry does not consider temporary worker accommodation should be prioritised at this stage. Including such accommodation in the WAS as a contingency is appropriate and the WAS hierarchy includes triggers for its delivery, if needed. Monitoring actual workforce demand as required by the EMF can identify when temporary worker accommodation is needed.

The Inquiry recommends changes to BTM-M006 (Workforce Accommodation Strategy) as this includes the more substantial requirements for the WAS.

Accommodation demand will be indirectly reduced through the recommended changes to the Workforce Development Strategy to maximise local employment, as discussed in Chapter 11.2. The recommendations will also assist to manage impacts on community services, noting the residual impacts on services are assessed as minor.

Regarding cumulative impacts, there is substantial renewable energy development in the region creating the potential for cumulative workforce accommodation demand. Multiple major projects drawing on the same existing accommodation could place significant pressure on an already constrained market, even where each project operates within its own demand threshold. Cooperation between project proponents regarding workforce accommodation will be important to address conditions at the time. The Inquiry recommends adding to the requirements under BTM-M006 (WAS) the consideration of contingency measures where impacts are greater than planned, including from cumulative workforce demand.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the impacts of the workforce demand arising from Victorian works can be appropriately avoided, minimised and managed.
- residual impacts are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend BTM-M006 (Workforce Accommodation Strategy) to expressly require the strategy include requirements around monitoring and

reporting, thresholds or triggers for action and contingency measures that include consideration of cumulative impacts.

13.3 Reeves Beach campground

(i) The issues

The issues are whether:

- construction impacts on Reeves Beach campground users can be appropriately avoided, minimised and managed
- the residual impacts are acceptable.

Issues relating to construction noise impacts are discussed in Chapter 10.2.

(ii) What did the EES say?

The proposed work at the Reeves Beach shore crossing has the potential to affect the recreational and tourism values of Reeves Beach, particularly use of the free Reeves Beach campground.

The campground is an informal campground managed by Parks Victoria, providing approximately 30 informal campsites. It is valued for its secluded coastal setting. It is used by several thousand campers each year, including repeat visitors with longstanding social and intangible connections to the location.

The EES assessed the effects of shore crossing construction on the amenity and attractiveness of Reeves Beach campground for users and other visitors. It assessed construction noise, 24-hour drilling during the shore crossing works, temporary construction infrastructure, the duration of construction activity and the availability of alternative camping opportunities elsewhere in Gippsland. The assessment acknowledged that tents and caravans provide limited acoustic shielding and that some users may avoid the campground during construction. As described in Chapter 1.2(ii) of the EES, construction works will be undertaken for 10-18 months across a 27 month period. The EES presented an indicative construction schedule, noting the actual sequencing of construction activities may vary.

Mitigation measures include meeting the relevant noise requirements and communication. Mitigation measure SOC-M003 (Stakeholder Engagement Plan) includes requirements to communicate with Reeves Beach campground users. Consultation with Parks Victoria about the construction noise and activity is separately required by BTM-M004 (Reeves Beach Campground) and includes providing resources to notify campground users and promoting alternative camping locations if required.

The residual impact on Reeves Beach campground users is assessed as moderate, while for other casual visitors minor to moderate.

The EES recognises that some users may be displaced to alternative camping areas during construction. Comparable free camping opportunities exist elsewhere, however

the EES notes that alternative free sites may be at or near capacity during peak periods and some displaced users may incur additional costs or reduce or defer holidays.

(iii) Submissions

Wellington Council raised concerns about the construction noise impacts on Reeves Beach campground, particularly the proposed nearby concrete batching plant. It sought for impacts to be managed through clear communication and monitoring, avoidance of peak tourism periods where practicable and information about alternative free camping options.

The Proponent submitted impacts on users of the Reeves Beach campground cannot be completely avoided. Impacts would remain moderate during construction, but have been minimised through project design, noise mitigation and mitigation measures requiring consultation and communication with the campground manager, Parks Victoria, and campground users.

(iv) Inquiry assessment

Impacts on Reeves Beach campground users cannot be avoided but can be appropriately minimised and managed. The mitigation measures, which are principally focussed on communication, are appropriate to manage the impacts subject to ensuring that communication occurs sufficiently in advance of relevant works.

The location and duration of the noise-generating works are largely a consequence of the proposed design, including the:

- proposed shore crossing location at Reeves Beach, consistent with the Gippsland REZ
- use of HDD to bore cables to avoid environmental and cultural values in the shore environs
- need for up to 8 bore holes and 24-hour drilling for 10-18 months across a 27-month construction period.

Beyond meeting the EPA requirements, as discussed in Chapter 10.2, the remaining mitigation measures are focussed on enabling campground users to avoid the affected locations by promoting alternative locations. This reinforces the need for effective communication.

Given construction noise can cause sleep disturbance (as discussed in Chapter 10.2), campground users should be given sufficient information in advance to make informed decisions about whether to use the campground. The EMF appropriately requires engagement with Parks Victoria and campground users regarding construction noise but should also guide when communication occurs including through:

- advance notice of when construction works and activities are scheduled to occur
- updates regarding the relevant construction works or activities that may affect noise impacts.

Scheduling construction works and activities outside peak use would be ideal but may not be practical given the need to integrate the shore crossing works with the broader

construction program. Works should not be required to avoid periods of peak campground use, however communications must be provided including promotion of alternative free campgrounds (as required by BTM-M004).

No material cumulative impacts that would alter the assessment of social impacts on Reeves Beach campground users have been identified.

(v) Findings

The Inquiry finds, subject to its recommendations:

- construction impacts on Reeves Beach campground users cannot be avoided but can be appropriately minimised and managed
- the residual impacts are acceptable.

(vi) Recommendations

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend SOC-M003 (Stakeholder Engagement Plan) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change.

b) Amend BTM-M004 (Consultation with Parks Victoria) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change.

13.4 Community benefits

(i) The issue

The issue is whether the proposed community benefit arrangements are sufficiently certain and implementable to provide appropriate benefits to communities affected by the Victorian works.

(ii) What did the EES say?

The EMF includes BTM-M003 (Community Benefit Fund). Technical Report Q explains that the Fund would:

- be funded directly by the Overall Project and operate across all associated phases
- support initiatives contributing to thriving regional communities, potentially including tourism and recreation initiatives
- be developed in collaboration with the community
- provide opportunities to respond to issues arising during construction, including initiatives to improve visitation outcomes in affected areas.

Technical Report Q states the scale of funding and decision-making framework had not yet been determined. Wider community participation in developing the Community Benefit Fund would occur once there was greater certainty around the Overall Project.

(iii) Submissions

Submissions broadly supported the proposed community benefit sharing approach, but raised concerns about its operation and implementation.

Concerns from Wellington Council, South Gippsland Council and other submitters included lack of clarity regarding how the benefits of the Victorian works would be distributed, including that benefits should:

- begin when construction starts and provide ongoing, sufficiently funded commitment
- extend to all affected communities
- be targeted to affected communities and proportionate to Project impacts
- be tangible, measurable and meaningful
- be guided by decisions informed by the local communities
- be supported by clear and enforceable commitments
- be delivered through a simple benefit-sharing framework, and be consistent with benefit-sharing for other major projects
- prioritise funding for community wellbeing, coastal resilience, environmental restoration, local infrastructure, tourism, education and skills development initiatives.

Other funding-related requests included:

- funding mechanisms separate to the Community Benefit Fund for Project related demands from workforce growth on essential infrastructure such as schools, roads, health services and sporting facilities
- an appropriate Payment in Lieu of Rates[12], or similar framework, to recognise increased demands on local infrastructure and local services associated with offshore wind development (raised by Wellington Council and South Gippsland Council).

In response to questions from the Inquiry the Proponent advised:

- the Community Benefit Fund would support social, economic and environmental initiatives for communities near the Victorian works
- governance, administration and approval processes have not yet been determined
- the governance structure, including arrangements for administration and approval of funding would be co-designed with Wellington Council, South Gippsland Council and beneficiary communities
- decisions would be community-led with input from the councils and other stakeholders
- a broader Community Benefit Program, being a Proponent commitment not required by the EMF, would be developed consistent with best practice guidance
- the broader Community Benefit Program would align with the core principles in the Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria: a guide for renewable energy developers.

[12] Payment in Lieu of Rates (PILOR) is a payment made to a Council by a project operator in place of ordinary council rates.

(iv) Inquiry assessment

The Community Benefit Fund as required by the EMF is an appropriate way to share the benefits of the Project with communities affected by the Victorian works. Subject to recommended changes to secure the co-design process, the EMF provides sufficient certainty the Fund will provide for benefits to communities affected by the Project.

Overall, the purpose and approach of the Community Benefit Fund generally align with the core principles of the *Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria: a guide for renewable energy developers*, including collaborative, locally appropriate benefit sharing. The Proponent's intent to facilitate community-led decision making and co-design with Councils and beneficiary communities is supported.

The Inquiry accepts that the detailed arrangements for the Fund are yet to be determined and does not consider the Fund needs to be fully designed at this stage. The funding arrangements, governance and initiatives can appropriately be developed through the proposed co-design process, allowing them to respond to community needs and priorities. This includes details about the matters raised in submissions such as the timing, duration and geographic distribution and allocation of the Fund.

That flexibility should be balanced however with sufficient certainty around how the Fund will be governed. The Final Day EMF appropriately secures the development and implementation of the Fund in consultation with the community and Councils under BTM-M003 (Develop and implement a community benefit fund). The Inquiry recommends the EMF expressly require the Fund arrangements to be established through a co-design process with Councils and beneficiary communities, as indicated by the Proponent.

The matters of Payment in Lieu of Rates or separate funding mechanisms are broader policy and funding considerations beyond the scope of the Inquiry.

(v) Findings

The Inquiry finds, subject to its recommendation:

- the proposed community benefit arrangements are sufficiently certain and implementable to provide appropriate benefits to communities affected by the Victorian works
- the proposed Community Benefit Fund is an appropriate tool to provide benefits to local communities affected by the Victorian works.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend BTM-M003 (Develop and implement a community benefit fund) to require the governance structure, including arrangements for administration and approval of funding, to be co-designed with the beneficiary communities and Councils.

14 Traffic and transport

14.1 Background

The following EES Chapters and technical reports are relevant to traffic and transport:

- Chapter 17 (Traffic and Transport)
- Technical Report X (Traffic and Transport).

Table 36 shows the relevant Evaluation Objective.

Table 36 Evaluation objective – Traffic and transport

Impact/effect	Evaluation objective
Community amenity, safety, roads and transport	To avoid, or minimise where avoidance is not possible, adverse effects on community amenity and health and safety, with regard to noise, vibration, dust, the transport network, fire risk management and electromagnetic radiation.

Table 37 shows the relevant legislation, policy and guidelines.

Table 37 Relevant legislation, policy and guidelines – Traffic and transport

Legislation	Policy/guidelines
- Road Management Act 2004 - Road Safety Act 1986 - Transport Integration Act 2010	N/A

14.2 Transport

(i) The issues

The issues are whether:

- traffic and transport impacts have been appropriately assessed
- traffic and transport impacts can be appropriately managed to avoid, or minimise where avoidance is not possible, and adverse effects on community amenity and safety are acceptable.

(ii) What did the EES say?

The EES assessed the impacts and risks from construction, operation and decommissioning of the Project on traffic and transport. The assessment considered:

- potential effects on road capacity and operation, road safety and condition, site access, and potential impacts on other road users, public transport, pedestrians and cyclists
- the local road network associated with the onshore transmission infrastructure as well as the wider roads expected to be used by construction traffic.

The EES did not assess transport matters relating to the development or use of a Gippsland-based port to support construction or operations which is subject to a separate approvals process.

The EES found the Project would generate additional light and heavy vehicle movements during construction of the onshore transmission infrastructure (estimated to generate up to 1,576 one-way vehicle trips per day and 363 vehicle trips during the peak hour at the six staging nodes where the transmission infrastructure alignment will connect to the local road network). Construction traffic would use the existing arterial and local road network and access points along the transmission alignment, and the additional traffic would remain within the theoretical capacity of the road network.

The assessment identified that some local roads and access points may not be suitable for construction traffic and heavy vehicle movements in their existing form. Detailed heavy vehicle routes, site access arrangements and any necessary road or intersection upgrades would therefore need to be determined before construction.

The EES concluded that construction traffic would result in temporary impacts on road capacity, safety, road infrastructure and other road users but that these impacts can be managed through standard traffic management measures. All residual construction traffic and transport impacts were assessed as minor or negligible.

The principal management mechanism is the Traffic Management Plan (TTP-M002) to be prepared before construction in consultation with the relevant road management authorities. The Traffic Management Plan would be supported by road safety audits, heavy vehicle route assessments and a site access strategy, with relevant road and access works subject to approval by the relevant road management authority.

Operational traffic impacts were assessed as negligible due to the relatively low level of traffic generated during operation. Decommissioning impacts are expected to be similar to, but lower than, construction impacts.

Minimal cumulative impacts are expected with small overlap in routes for construction and operations traffic from other projects. While the number of vehicles in the region may increase if all the projects relevant to the cumulative impact assessment were constructed at the same time, this traffic increase should be manageable with appropriate mitigation measures developed to the satisfaction of the relevant road management authority.

(iii) Submissions

Some submitters raised concerns about increased construction and heavy vehicle traffic, road closures and disruption to local access. Concerns included road safety, emergency access and the capacity and condition of local roads. One submitter raised concerns that construction at Woodside Beach Road would restrict the road to one lane, with implications for access during the fire season.

Wellington Council considered the EES provided a reasonable level of detail regarding traffic. It raised concerns about deferring various traffic and road management matters until after the EES process and relying on the Traffic Management Plan and other management plans. It was concerned this would delay decisions on the detailed design of transport infrastructure for Council-controlled roads.

Wellington Council submitted the EES did not adequately define Council's role in reviewing and approving works affecting Council-managed roads. It sought greater certainty that all affected assets would be returned to an agreed condition with no unintended transfer of liability or maintenance costs to Council.

Wellington Council noted the EMF provides for its involvement, including in the Stakeholder Engagement Plan and Traffic Management Plan but it requested clarification on some roles:

- consultation on the Traffic Management Plan, with a clear role in reviewing and approving works affecting Council-managed roads
- consultation on the Stakeholder Engagement Plan (SOC-M003), to which the Proponent agreed as reflected in the Final Day EMF
- review and approval of the final scope and design of upgrades, accesses and crossings affecting Council-managed roads.

DEECA raised concerns that road closures could impede access for firefighting vehicles and heavy plant, including access to Jack Smith Lake Wildlife Reserve. It recommended that the EMF measures be updated to include:

- mitigations around high fire danger, firefighting equipment and staff capability
- protocols to ensure Parks Victoria and DEECA are notified at least two months prior to commencement of works, including any potential road closures/impacts to the road network.

The Proponent submitted the statutory requirements together with Traffic Management Plan established a framework sufficient to address more detailed concerns raised by Wellington Council at a later time. It said:

- the requirements of the Traffic Management Plan include consultation and agreement with road authorities on road condition, maintenance, remediation and asset handback arrangements
- Wellington Council has approval and management powers under the *Road Management Act 2004*
- the planning permissions provided by the draft Incorporated Document do not displace separate approvals under that road legislation
- it is sufficient that Council be consulted on relevant traffic and transport plans and its approval obtained for any works on roads pursuant to the *Road Management Act 2004*.

The Proponent submitted the approach taken by the EES was typical for major projects, with the EES identifying relevant traffic and roads, and for related impacts and risks to be managed in consultation with the road authorities. It said that detailed implementation matters can be appropriately resolved to the satisfaction of the relevant road authority and asset owner closer to construction.

The Proponent agreed to the following as included in the Final Day EMF:

- an additional mitigation measure UWNM16 (Bushfire management activities on public land) as recommended by DEECA
- a change in the Traffic Management Plan (TTP-M002) to include protocols to ensure Parks Victoria and DEECA are notified two months prior to

commencement of works including in relation to potential road closures and impacts to the road network.

(iv) Inquiry assessment

The Inquiry is satisfied the transport impacts and risks have been adequately assessed, and the EES provides a comprehensive analysis of existing conditions, potential impacts and mitigation measures. The EMF provides a sufficient framework to manage impacts. It requires the preparation of the Traffic Management Plan and associated management plans and appropriate consultation with Wellington Council. Subsequent approval from the relevant road authorities will be required regarding implementation of any necessary road works and related measures. For clarity, the stage allocated to TTP-M002 (Traffic management plan) should be amended to require preparation of the TMP pre-construction, and implementation during construction.

While there will be some impacts along parts of the road network in the region particularly from additional heavy vehicle traffic generated during the construction phase, more detailed work will be undertaken before construction to prepare the relevant mitigation plans, including the Traffic Management Plan. The EES assessment is sufficiently thorough, robust and detailed for this stage of the process.

The proposed mitigation and management measures are comprehensive and appropriate for inclusion in the EMF as relevant to traffic and transport issues, including construction traffic. The impacts can be managed through the implementation of the proposed mitigation measures and the residual impacts are acceptable. It is appropriate that Wellington Council is consulted for the Stakeholder Management Plan.

The Inquiry does not recommend any changes to the Final Day EMF with respect traffic and transport. That EMF includes the need for Wellington Council to be consulted as part of the TTP-M001 (Communications and Stakeholder Engagement Plan). The other changes sought by Wellington Council are unnecessary as they would effectively replicate the powers conferred on it and other road managers by the *Road Management Act 2004*.

The changes agreed by the Proponent in response to DEECA appropriately address the concerns raised in the submissions regarding emergency and fire access.

Cumulative traffic impacts can be managed by the Traffic Management Plan which requires consideration of cumulative impacts of other major projects in the local area which may change traffic conditions.

(v) Findings

The Inquiry finds, subject to its recommendation:

- traffic and transport impacts have been appropriately assessed, and impacts
- impacts can be appropriately minimised and managed
- the residual impacts are acceptable.

(vi) Recommendation

The Inquiry recommends:

Amend the Environmental Management Framework as follows:

a) Amend TTP-M002 (Traffic management plan) to require preparation of the Traffic Management Plan pre-construction, and implementation during construction.

15 Land use impacts

15.1 Background

The following EES Chapters and technical reports are relevant to land use impacts:

- Chapter 12 (Agriculture and Forestry)
- Chapter 22 (Land Use and Planning)
- Technical Report S (Agriculture and Forestry)
- Technical Report T (Land Use and Planning).

Table 38 shows the relevant Evaluation Objective.

Table 38 Evaluation objective – Land use impacts

Impact/effect	Evaluation objective
Community amenity, safety, roads and transport	To avoid, or minimise where avoidance is not possible, adverse effects on community amenity and health and safety, with regard to noise, vibration, dust, the transport network, fire risk management and electromagnetic radiation.

Table 39 shows the relevant legislation, policy and guidelines.

Table 39 Relevant legislation, policy and guidelines – Land use impacts

Legislation	Policy/guidelines
PE Act	Planning Scheme

15.2 VicGrid connection hub

(i) The issue

The issue is whether the draft Incorporated document and SCO3 should:

- apply to the VicGrid connection hub land.
- Reference or enable any development on the VicGrid connection hub land.

(ii) What did the EES say?

EES Chapter 4 (Description of Victorian works) explained the Project will connect to the proposed VicGrid connection hub and associated the land is subject to a separate assessment and approval process. It states:

> The alignment option taken forward for the project will depend on the location of the final precise location of the VicGrid connection hub, as well as ongoing engagement with landholders. Once this location is known, project alignment options within the connection hub study area may require modification. Alignment options shown within the connection hub study area are therefore indicative.

EES Attachment I (EES Map Book) shows the construction area and proposed easements which does not include the VicGrid connection hub land (see Figure 11). The EES described the onshore project area consisting of an approximately 30 kilometre corridor extending from the shore crossing to the proposed VicGrid connection hub property boundary.

Figure 11 EES Map excerpts



Overview map (excerpt) **Map 13 (excerpt)**

The VicGrid connection hub land was not assessed as part of the EES (or in many of the technical reports underpinning the EES.

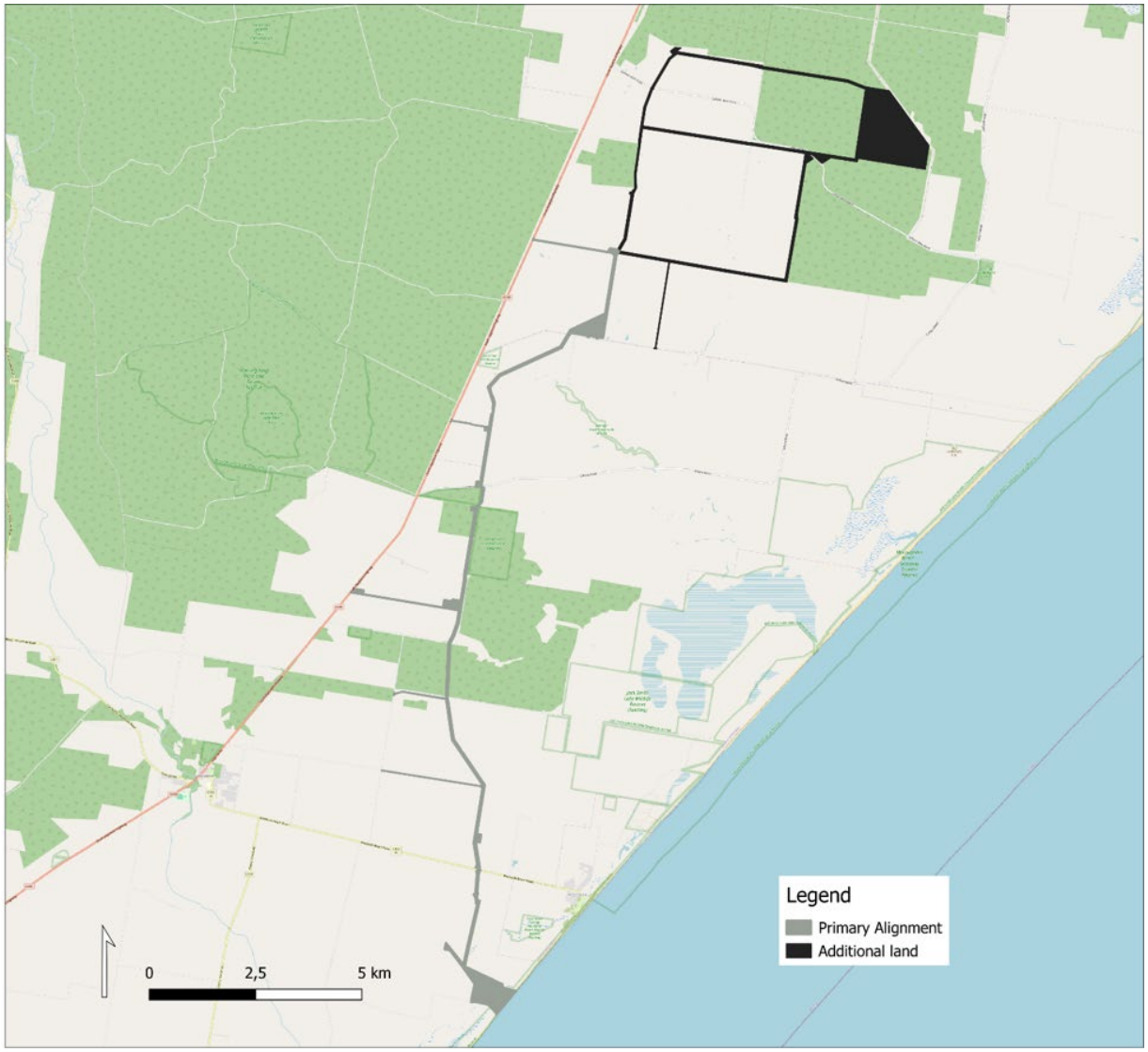
The draft PSA proposes to apply the SCO3 to what is described in the draft Incorporated document as the 'Project land', which includes the VicGrid connection hub land (see Figure 12).

The draft Incorporated Document includes clauses relating to the VicGrid connection hub, including:

- Clause 3.1 and Figure 1 state the VicGrid connection hub land is included in the 'Additional Land'
- Clause 5.2 states the Project includes use and development for utility installations and associated buildings and works consisting of the onshore electricity transmission system between the "*shore crossing and the VicGrid connection hub property boundary*"
- Clause 6.8 states:

  If the Alignment Plans show Project infrastructure within the Connection hub study area, the Alignment Plans submitted to the Minister must include a report setting out the reasons for the proposed location of Project infrastructure within the Connection hub study area. The report must demonstrate that the location of infrastructure in the Connection hub study area applies the three step approach in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation…*

Figure 12 Map of land to which the draft Incorporated Document applies



Source: EES Attachment III (Draft planning scheme amendment)

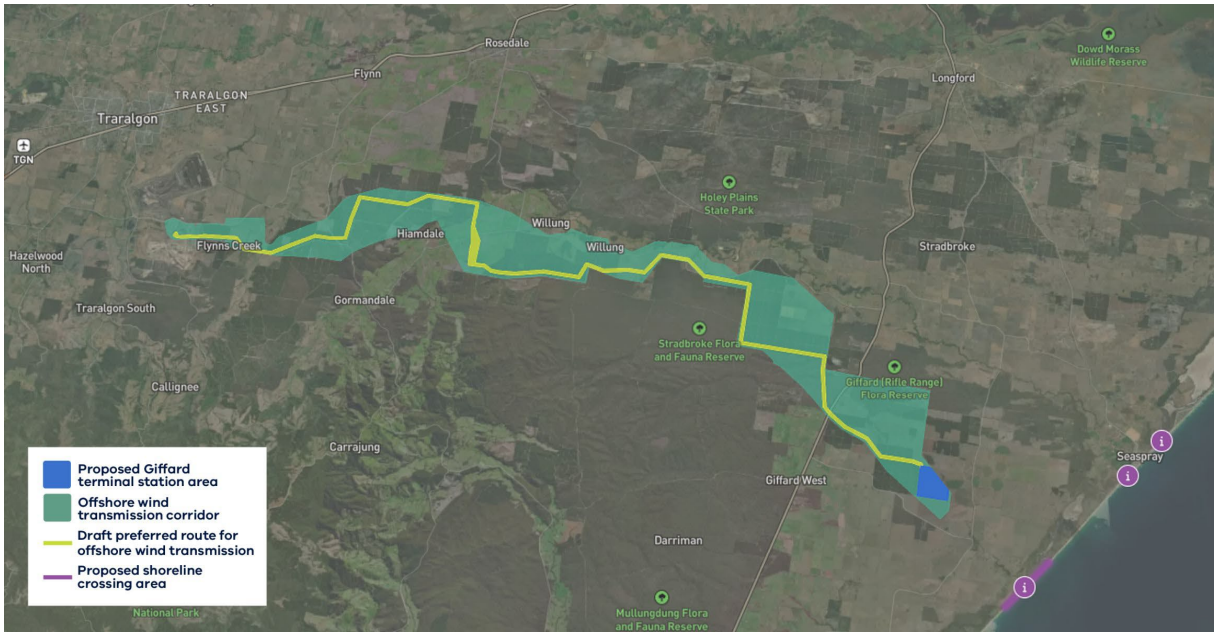
(iii) Submissions

The Proponent submitted the final alignment through the VicGrid connection hub land cannot be determined until the location and configuration of the VicGrid infrastructure is confirmed, requiring flexibility to locate the Victorian works connection infrastructure within that area. It said:

- the VicGrid connection hub works form part of the Gippsland offshore wind 2GW transmission project (VicGrid Project) (see Figure 13)
- the VicGrid Project works is undergoing a separate EES and PSA process and the Minister for Planning approved the associated final scoping requirements in June 2025
- the Minister for Planning will need to approve the location of the VicGrid substation at the completion of the EES and PSA assessment for that project
- VicGrid Project will determine the location and requirements for connecting the Gippsland offshore wind farms (including the Victorian works) to its substation

- the VicGrid connection may in turn influence which of the Project alignment options is preferred.

Figure 13 VicGrid Project



Source: Document 47

In response to a question from the Inquiry about the operation of Clause 6.8 of the draft Incorporated Document, the Proponent explained that if the Alignment Plan proposes infrastructure within the VicGrid connection hub land then the Proponent must justify its location and demonstrate application of the Native Vegetation Guidelines.

(iv) Inquiry assessment

The draft PSA proposes to apply the SCO3 (and draft Incorporated document) to the VicGrid connection hub land, enabling development to occur on that land that has not been assessed in the EES. Based on the information before it, the Inquiry considers applying the SCO3 to the VicGrid connection hub land is premature and there is insufficient justification. All provisions in the draft Incorporated document that enable works on that land should be deleted.

The location of the substation in the VicGrid connection hub land and connection design is not finalised, and the technical reports for the EES did not include an assessment of VicGrid connection hub land (as shown on the EES maps, see Figure 11). While the EES did not assess the environmental effects of works occurring on the VicGrid connection hub land, the draft PSA proposes to apply the SCO3 to this site. This presents a risk that the EES and PSA allows development on land where the environmental effects are less well understood (and the assessment is subject to a separate process).

While Clause 6.8 of the draft Incorporated document will manage this risk to an extent, by requiring a native vegetation assessment for the final alignment within the VicGrid connection hub land, this is not sufficient. There are other environmental effects that should be assessed before determining the appropriate location of infrastructure and

the mitigations necessary to ensure impacts are acceptable for works in the VicGrid connection hub land, including for example Aboriginal cultural heritage.

(v) Findings

The Inquiry finds, subject to its recommendations:

- the SCO3 should not be applied to the VicGrid connection hub land until further assessment work is undertaken to assess environmental impacts
- draft Incorporated document should be amended to delete Clause 6.8.

(vi) Recommendations

The Inquiry recommends:

Amend the draft Incorporated Document as follows:

a) Remove references to VicGrid connection hub works and approvals.

Amend the draft Wellington Planning Scheme Amendment C129well maps to remove the VicGrid connection hub land.

15.3 Landowner impacts

(i) The issue

The issue is whether the impacts on existing land uses, including easement restrictions associated with the final alignment, can be appropriately avoided, minimised and managed.

Issues relating to other land use matters are discussed in other chapters including:

- construction phase impacts on agriculture and forestry businesses (see Chapter 11.3)
- economic impacts of the easements on agriculture and forestry businesses (see Chapter 11.3)
- ecological impacts on Woodside H28 Bushland Reserve (see Chapter 6.2)
- social impacts at Reeves Beach campground (see Chapter 13.3).

(ii) What did the EES say?

The final 30 kilometres of the transmission infrastructure alignment will traverse land used predominantly for agriculture, plantations, conservation and roads.

The final alignment (which will be confirmed at detailed design) will determine where the transmission infrastructure will be located and the associated construction corridor (see Chapter 1.2(i)). The transmission easement and associated restrictions will apply within the final alignment.

The EES identified existing land uses and sensitive receptors, reviewed relevant legislation and planning policy and controls, and assessed the severity, extent and duration of potential effects and the effectiveness of measures to avoid, minimise and manage impacts.

The EES distinguished between sensitive land uses, comprising dwellings, conservation and recreation areas, and non-sensitive land uses, principally agriculture, plantations and transport. No dwellings are intersected by the construction corridor, although five are located within 250 metres.

The EES assessed the potential for Victorian works to affect existing and reasonably foreseeable land uses, including through changes to access, amenity and land use function and easement restrictions. It considered temporary construction effects on land use and access, and the longer-term effect of the proposed 40-metre-wide final alignment. Construction is proposed to be staged and sequenced where practicable to minimise the duration of effects on individual properties.

Construction impacts on agriculture, forestry and third-party infrastructure, were assessed as minor.

During operation, most existing land uses could continue, however the 40-metre-wide easement would impose ongoing restrictions, including on buildings, dams and tanks, deep tilling or ripping, plantation forestry and planting vegetation with deeper root systems, as well as maintaining access for inspection and maintenance. The EES assessed the residual operational land use impact as negligible.

The EES concluded the residual non-sensitive land use impacts are minor or negligible because of the temporary and confined nature of the works, although some movement and access restrictions during construction and operations cannot be avoided.

The draft Incorporated Document provides the statutory approval framework for:

- the transmission infrastructure and creation of the easement
- the registered easement which establishes ongoing land use restrictions
- operational management measures which seek to minimise disruption associated with access and maintenance associated with the easement.

The draft Incorporated Document would allow the use and development of the final alignment subject to its conditions and would prevail over inconsistent provisions of the Planning Scheme. The draft Incorporated Document requires (among other things) Alignment Plans, an EMF and a plan of subdivision. The Alignment Plan must:

- be prepared and approved before development starts
- identify the final alignment and the land required for the Victorian works (within the land area assessed under the EES)
- identify the route of the onshore transmission system, shore crossing infrastructure, construction laydown areas and access tracks
- where infrastructure is proposed within the VicGrid connection hub land, be supported by a report that demonstrates application of the three-step approach under the Native Vegetation Guidelines.

(iii) Submissions

Wellington Council was mainly concerned with easement restrictions on farming activities including:

- the easement would restrict some activities that would otherwise be permitted on affected properties
- the draft Incorporated Document exempted Project-related subdivision from permit requirements, without replacement controls to manage subdivision outcomes such as the creation of small allotments in the Farming Zone
- restrictions should be clearly identified and mapped so Council can provide accurate planning advice
- it should be provided with costs and administration associated with registering easements
- clarity was needed regarding Council's role in the Alignment Plan approval process.

In response to issues raised by Wellington Council, the Proponent said:

- the subdivision requirements exemption was necessary to provide a single planning approval framework for the Project
- any subdivision would remain subject to the *Subdivision Act 1988*
- it would work with Wellington Council post approval to provide details of restrictions.

Overall, the Proponent's main position was that operational land use impacts from the transmission easement would be negligible because most existing land uses could continue despite the easement restrictions. It relied on:

- the transmission infrastructure being underground
- the final alignment easement being limited to 40 metres in width
- affected land being predominantly used for agricultural, with grazing and most cropping being able to continue
- restrictions applying only to particular activities, such as buildings, deep excavation and deep-rooted vegetation
- the final alignment generally comprising relatively small parts of individual properties
- operational access and maintenance being infrequent and managed through ongoing landholder engagement
- landowners were being consulted through options agreements and the Proponent committed to continued consultation
- precise restrictions not changing through detailed design to the degree that assessed impacts would materially change.

The Proponent submitted that post-operation:

- easement restrictions would remain for as long as required to protect the Project infrastructure, which may be beyond the operational life of the Project
- decommissioning would be undertaken in consultation with landholders and in accordance with applicable regulatory requirements and a Decommissioning Environmental Management Plan
- leaving most below-ground infrastructure in place would minimise disturbance compared with its removal.

Regarding the final alignment approval and the SCO3 the Proponent submitted:

- the final alignment will be influenced the VicGrid connection, landholder negotiations and avoidance and minimisation considerations
- once an Alignment Plan was endorsed, any subsequent change is unlikely and would require preparation of an amended Alignment Plan in accordance with the draft Incorporated Document
- further statutory consultation on the selection and approval of the final alignment is unnecessary because the alignment options had been subject to the EES process
- the SCO3 would remain over all the alignment options, however it should be removed where not required at the earliest opportunity, either through a planning scheme amendment led by Wellington Council or the Minister for Planning.

(iv) Inquiry assessment

The impacts on existing land uses, including easement restrictions associated with the final alignment, can be appropriately minimised and managed, subject to recommended changes to address potential uncertainty for landowners.

Application of SCO3 and Alignment Plan

It is appropriate to apply the SCO3 to the common alignment and alignment options at this stage of the process. This will secure the land for this purpose and will allow for design detail to respond to final VicGrid connection hub requirements.

The SCO3 will facilitate the Victorian works through a single, coordinated planning approval framework rather than relying on various controls and approval processes. It supports consistent decision making and environmental outcomes, and provides transparency about the approval process.

Some flexibility to amend the Alignment Plan is necessary to enable the final alignment to respond to detailed design. The Final Day Incorporated Document includes steps which provide sufficient certainty, including endorsement by the Minister for Planning endorsement and consultation with "*relevant councils, relevant government agencies and other stakeholders including community groups and business associations*". This should be amended to expressly require consultation with affected landholders to ensure their views are sought.

Clause 1.4 of the Final Day Incorporated Document states:

> The control in this Incorporated Document does not apply to the use and development of the Project Land (as defined in Clause 3.1) for purposes other than the Project. Use and development of the Project Land for purposes other than the Project must be in accordance with the provisions of the Planning Scheme.

Given this, it would be logical and appropriate to remove the SCO3 from land when it is known it will not be used for the Project. The Proponent supported this however a specific process was not proposed. Relying on a planning scheme amendment at an undefined time does not provide sufficient certainty to landowners and other stakeholders regarding the use and development of land.

The Inquiry recommends the Final Day Incorporated Document include a new provision which imposes an expiry of the application of the SCO3 to unused land 12 months

following registration of all required easements, unless otherwise agreed by the Minister for Planning.

The recommended change does not however remove the ongoing uncertainty for affected landowners about ongoing application of SCO3. This relates to both unused land and other alignment land following operation. It would be good practice to remove SCO3 from the Project Land when it is no longer required.

Subdivisions and easement approval framework

As noted by Wellington Council, the Final Day Incorporated Document could facilitate lot sizes and arrangements that are discouraged by the underlying Farming Zone provisions (mandatory minimum lot sizes of 40 hectares).

Property configuration will be considered and balanced against other factors when determining the final alignment. The draft Incorporated Plan sets out a decision-making process which requires consideration of the location and design of Project infrastructure and views of relevant authority amongst other matters.

The Inquiry is satisfied this is an acceptable approach given:

- the common alignment land has been selected with input from environmental investigations and input from landowners and various authorities and agencies
- the Alignment Plan must be generally in accordance with the EES-assessed alignment
- land along the Alignment Plan will not necessarily require subdivision
- the draft Incorporated Document provides opportunity for consultation with stakeholders (including landowners subject to the recommended changes discussed above) at the Alignment Plan approval and amendment stages
- the *Subdivisions Act 1988* and associated certification, referral, statement of compliance and registration steps still apply.

Ongoing land use impacts

The Inquiry accepts that land use impacts across the final alignment will be limited. The list of proposed easement restrictions provides a sufficient level of detail to understand the land use impacts within the scope of the Inquiry's assessment. In large part, current land activities can continue, the proportions of properties affected are limited and the locations generally do not overlap with important land functions.

The EES impact rating does not however establish the effect on every individual property will be negligible. The nature and location of the alignment and associated easement restrictions may result in different impacts for individual properties, particularly for varying agricultural and forestry practices.

Overall, the Inquiry is satisfied the residual impacts are acceptable. The final alignment envelopes are relatively spatially-confined on properties and do not disrupt underlying land use, even if some business operations may require adjustment. Several management and compensatory measures are proposed which, while not removing the underlying land use restrictions, assist in reducing the practical and financial burden on affected landowners. These include AGM-M002 (Property Management Plans), AGM-M001 (Compensation for economic impacts) and LUP-M002 (operational management).

Duration and decommissioning

The easement restrictions will persist long term and could extend beyond the 30-year Project operations period if the infrastructure remains in place. This could place limitations on future changes in land use activities.

Leaving infrastructure in place to avoid associated environmental disturbance is a standard approach but could mean associated restrictions continue to apply after operation. The implications of this are difficult to assess at this stage as they will not be known until after the operation period. It would be good practice to review the imposition of ongoing easement restrictions during the decommissioning phase however the Inquiry does not recommend any related changes.

Cumulative impacts

The EES assessment of cumulative impacts focussed primarily on concurrent construction effects and the coordination of works that are addressed elsewhere in this Report. The EES did not consider the potential impacts of multiple easement restrictions on ongoing land use and development. Based on the information before the Inquiry, the potential for multiple easement restrictions is not expected to result in material additional land use impacts particularly given land use can generally continue.

(v) Findings

The Inquiry finds, subject to its recommendations:

- the impacts on existing land uses, including easement restrictions associated with the final alignment, can be appropriately avoided, minimised and managed
- the draft Incorporated Document should be amended to require landholder consultation regarding any changes to the Alignment Plan and a new expiry clause for land not included in the endorsed Alignment Plan.

(vi) Recommendations

The Inquiry recommends:

Amend the draft Incorporated Document as follows:

a) Amend Clause 6.4 to include expressly list affected landowners as parties to consult regarding changes to the Alignment Plan.

b) Add a new Clause which states:

The control in this Incorporated Document ceases to apply to any Project Land that is not included in the endorsed Alignment Plan, 12 months after registration of all required easements on property titles where the Project is located, unless otherwise agreed in writing by the Minister for Planning.

PART D: APPENDICES

Appendix A Terms of Reference

Version: 14 May 2026

The Star of the South Project Inquiry is appointed to inquire into, and report on, the environmental effects of the Victorian works of the proposed Star of the South Project (the project) on the Victorian environment as assessed in the environment effects statement (EES), in accordance with these terms of reference.

Name

1. The Inquiry is to be known as the 'Star of the South Victorian Inquiry'.

Skills

2. The Inquiry needs to consist of members with expertise in:
   a. terrestrial ecology;
   b. marine ecology and coastal processes;
   c. infrastructure construction and associated environmental management of amenity (noise and vibration), soil and waste; and
   d. land use planning.
3. The Inquiry will comprise an appointed Chair (Inquiry Chair), a Deputy Chair and other appropriately qualified members.

Role of the Inquiry

4. The Inquiry is appointed by the Minister for Planning (the Minister) under section 9(1) of the *Environment Effects Act 1978* (EE Act) to hold an inquiry into and report to the Minister on the environmental effects of the Victorian works on the Victorian environment, which entails:
   a. reviewing and considering the content of the EES (covering Victorian works) and submissions received on the EES in relation to the effects of Victorian works on the Victorian environment (including cumulative effects arising from the project's Victorian works with other projects anticipated in Victoria);
   b. considering and reporting on the significance and acceptability of the environmental effects of the Victorian works on the Victorian environment, having regard to relevant policy and legislation;
   c. identifying any additional mitigation measures and/or project modifications beyond those identified in the EES to avoid, mitigate or manage the likely significant environmental effects of the Victorian works on the Victorian environment consistent with relevant policy, legislation and best practice; and
   d. advising on how these modifications and measures, referenced in paragraph 4c, should be implemented through the necessary Victorian approvals and Victorian consents needed for the project.
5. The Inquiry must produce a report of its findings and recommendations, to be provided to the Minister. This report will inform the Minister's assessment under the EE Act of the environmental effects of the project's Victorian works.

Scope of the Inquiry – Excluded matters

6. The Inquiry must not consider and make findings on specific matters of national environmental significance, under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), whether those matters are located in Victoria or elsewhere.
7. The Inquiry must not consider the environmental impact statement (EIS) prepared under the EPBC Act for the project and is only required to consider the technical reports exhibited with the EES to the extent they relate to effects of the project's Victorian works on the Victorian environment.
8. The Inquiry is not to examine or report on the EES process itself undertaken to date, or the consultation undertaken by the proponent for the EES.

Scope of the Inquiry - Key Victorian Matters and Other Victorian Matters

9. The Inquiry must limit the scope of its proceedings to relevant matters associated with Victorian works, which includes only 'Key Victorian Matters' and 'Other Victorian Matters' as listed below.
10. The 'Key Victorian Matters', associated with the potentially significant effects from Victorian works on the Victorian environment, are:
    a. onshore ecology;
    b. Victorian marine environment and marine protected areas;
    c. coastal processes;
    d. Aboriginal cultural heritage;
    e. construction impacts confined to onshore noise and vibration, soil and waste; and
    f. the Environmental Management Framework and draft PSA to the extent relevant to the management of the matters listed from (a) to (e) in this clause.
11. The 'Other Victorian Matters', which are less likely to have significant environmental effects from Victorian works on the Victorian environment, are:
    a. business and tourism;
    b. groundwater and surface water;
    c. social;
    d. traffic and transport;
    e. land use impacts; and
    f. the Environmental Management Framework and draft PSA to the extent relevant to the management of the matter listed from (a) to (e) in this clause.
12. The Inquiry's consideration of 'Key Victorian Matters' is to occur via Submitter Conference[13].
13. The Inquiry's consideration of 'Other Victorian Matters' is to occur only via written submissions[1], including the proponent's written responses to submissions on these 'Other Victorian Matters'.

[13] Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978, page 33.

Process

Exhibition

14. The EES will be exhibited for a period of 30 business days together with the draft PSA and be made publicly available for submissions.
15. The proponent is responsible for any public information sessions during exhibition to discuss the project and their EES documentation.

Submissions

16. Submissions on the EES including the draft PSA are to be provided in writing on or before the close of submissions date.
17. Submissions on the EES including the draft PSA will be collected by the office of PPV through the Engage Victoria platform. All submissions must state the name and address of the person making the submission. Submissions will be collected and managed in accordance with the privacy guidance on the PPV website.
18. Petition responses will be treated as a single submission and only the first names from a petition submission will be registered and contacted.
19. Pro-forma submitters will be registered and contacted individually if they provide their contact details. However, the Inquiry is to encourage pro-forma submitters who want to be heard at the Submitter Conference to present as a group, given their submissions raise the same issues.
20. All written submissions and other supporting documentation or evidence where appropriate, received through the course of the Inquiry process should be published online, unless the Inquiry specifically directs that the submission or other material, or part of it, is to remain confidential.
21. Requests for submissions or other material to be kept confidential must be clearly stated in writing with reasons to the Inquiry through PPV, consistent with the process outlined in the Inquiry's Privacy Collection Statement. The Inquiry will review these and base its decision to maintain confidentially on whether it would be fair to the proponent and other parties to the proceedings.
22. Electronic copies of submissions are to be provided to the proponent, Department of Transport and Planning (DTP) (Impact Assessment and Energy & Infrastructure Assessment), Wellington Shire Council and Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC).
23. PPV must retain any written submissions and other documentation provided to the Inquiry for a period of five years after the time of the Inquiry's appointment.

Inquiry by Submitter Conference

24. The Inquiry is to conduct a Submitter Conference focusing only on the specific 'Key Victorian Matters' listed in these terms of reference.
25. The Submitter Conference is to be structured around topics listed in the 'Key Victorian Matters' and is to be conducted to enable an efficient approach to examining the relevant aspects of the EES and issues raised in submissions, consistent with these terms of reference.

26. All submissions and other material considered through the Submitter Conference needs to strictly focus on the 'Key Victorian Matters', including the presentation of any further evidence or experts.
27. The Inquiry may limit the time of parties submitting at the Submitter Conference, and needs to direct that:
    a. 'Other Victorian Matters' are not to be raised at the Submitter Conference and will be assessed by the Inquiry through written submissions only;
    b. The EIS and associated Commonwealth matters are not to be discussed at the Submitter Conference and will not be considered by the Inquiry.
28. Prior to the commencement of the Submitter Conference, the Inquiry may hold a directions hearing to make directions it considers necessary or appropriate as to the conduct, scope or scheduling of the Submitter Conference, including the preparation and publication of a Response to Request for Further Information if required.
29. The Inquiry may inform itself on the 'Key Victorian Matters' in any way it sees fit, but must review and consider:
    a. the exhibited EES including the draft PSA;
    b. all submissions and evidence provided to the Inquiry by the proponent, state agencies, local councils and submitters, in so far as they relate to 'Key Victorian Matters' examined in the EES;
    c. the views (if known) of Traditional Owners and Registered Aboriginal Parties;
    d. any information provided by the proponent and parties that respond to submissions or directions of the Inquiry in relation to 'Key Victorian Matters'; and
    e. any other relevant information that is provided to, or obtained by, the Inquiry, in relation to the 'Key Victorian Matters' examined in the EES.
30. The Inquiry must conduct the Submitter Conference in accordance with the following principles:
    a. it will be conducted in an open, orderly and equitable manner, in accordance with the principles of natural justice;
    b. the Submitter Conference needs to be conducted with a minimum of formality and without legal representation being necessary for parties to be effective participants;
    c. the Submitter Conference is to be exploratory and constructive, focusing on understanding and resolving matters; and
    d. adversarial behaviour is not permitted and questioning of experts and submitters needs to be regulated by the Inquiry in the context of resolving matters and these principles.
31. The Submitter Conference should commence with the proponent making a short presentation, setting out the description and location of Victorian works, and the structure and content of the EES in relation to 'Key Victorian Matters'.
32. The proponent is to address issues raised in submissions (either by way of presentation or the tabling of documents) to fit within the Inquiry's structure for the Submitter Conference, around 'Key Victorian Matters'. This information from the

proponent should advise of any changes made to the 'Key Victorian Matters' in response to submissions received on the exhibited EES.

33. The Inquiry may direct that a submission or evidence is confidential in nature and the Submitter Conference be closed to the public and not be recorded for the purposes of receiving that submission or evidence.
34. The Inquiry may conduct the Submitter Conference when there is a quorum of at least two of its members present or participating through electronic means, one of whom must be the Inquiry Chair or Deputy Chair.
35. If directed by the Inquiry, an audio recording of the conference must be procured by the proponent. If recorded, the audio recording will be provided to PPV as a weblink and would be made publicly available as soon as practicable after the conclusion of each day of the conference, or otherwise as directed by the Inquiry.
36. Any other recording of the conference by any other person or organisation may only occur with the prior consent of, and strictly in accordance with, the directions of the Inquiry.

Inquiry by written submissions

37. The Inquiry is to consider 'Other Victorian Matters' by written submissions only, including the proponent's written responses to any submissions on 'Other Victorian Matters'.
38. All material considered through the written submissions needs to strictly focus on the 'Other Victorian Matters' and not include the presentation of evidence or expert witnesses.
39. The Inquiry is to inform itself on the 'Other Victorian Matters' by reviewing and considering:
    a. the exhibited EES including the draft PSA;
    b. submissions provided to the Inquiry, in so far as they relate to 'Other Victorian Matters' examined in the EES;
    c. the proponent's written responses to any submissions on 'Other Victorian Matters'; and
    d. other written information provided at the direction of the Inquiry in relation to 'Other Victorian Matters'.

Report

40. The Inquiry must produce a written report for the Minister containing its:
    a. analysis and conclusions on the significance and acceptability of environmental effects with respect to the 'Key Victorian Matters' and 'Other Victorian Matters';
    b. findings on whether acceptable environmental outcomes can be achieved, having regard to legislation, policy and best practice;
    c. recommendations and/or specific measures that it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects;
    d. recommendations relating to any feasible modifications to the design or management of the project necessary to reduce or mitigate significant environmental effects; and

e. recommendations for any appropriate conditions or requirements that may be lawfully imposed on any approval for the project, including the draft PSA, necessary and appropriate to reduce or mitigate significant environmental effects; and
f. recommendations as to the structure and content of the proposed Environmental Management Framework, including monitoring of environmental effects, reporting on the effectiveness of mitigation measures, contingency plans and site rehabilitation.

41. The report needs to include information and analysis of the significant environmental effects, sufficient to support the Inquiry's findings and recommendations. Without limiting this requirement, the report needs to:
    a. focus on the 'key Victorian matters';
    b. include information and depth of analysis proportionate to the significance of the environmental effects; and
    c. address 'Other Victorian Matters' at a high level, having regard to the relative significance of the likely effects.
42. The report needs to include:
    a. a list of all recommendations, including cross-references to relevant discussions in the report;
    b. a description of the Submitter Conference conducted, and a list of parties heard through the Submitter Conference;
    c. a list of the documents tabled during the Inquiry proceedings;
    d. a list of all submissions collected by PPV on the exhibited EES including the draft PSA, including clear indication of submissions that were considered with respect to 'Other Victorian Matters'.
43. Matters that the Inquiry determines have minor or negligible impact and can be readily addressed through standard and proven environmental management techniques do not need to be reported by the Inquiry. Simple recording of these matters in the report will be sufficient.

Timing

44. If it chooses to hold a directions hearing, the Inquiry needs to hold a directions hearing, which should be 15 business days from the final date of the exhibition period.
45. The Inquiry needs to commence the Submitter Conference no later than 30 business days from the final date of exhibition period.
46. The Inquiry must submit its report in writing to the Minister for Planning within 40 business days from the last day of its proceedings, unless the report writing period spans the Christmas-New Year period, in which case 50 business days will apply.
47. The DTP's Impact Assessment Unit must liaise with PPV to agree on dates for the directions hearing (if required), and the Submitter Conference.

Minister's assessment

48. The Minister will make an assessment of the environmental effects of the Victorian works after considering the Inquiry's report as well as the EES, relevant submissions and any other relevant matters.

49. PPV will notify submitters of the release of the Minister's assessment and the Inquiry report.

Fee

50. The fees for the members of the Inquiry will be set at the current rate for a panel appointed under Part 8 of the PE Act.
51. All costs of the Inquiry, including the costs of obtaining any expert advice, technical administration and legal support, venue hire, accommodation, recording proceedings and other costs must be met by the proponent.

Miscellaneous

52. The Inquiry may apply to the Minister (or their delegate) to request variation to these terms of reference in writing. Reasons for the request must be included in the request. However, any request to vary the timeframe for the submission of its report needs to be received within the first 25 business days of the report writing timeframe.
53. The Inquiry may obtain additional technical support, expert advice or legal support to assist if considered necessary.
54. PPV is to provide any necessary administrative support to the Inquiry. The proponent is to provide any necessary administrative or technical support to the Inquiry in relation to the conduct of the conference.



Adam Henson
Acting Executive Director, State Planning Assessment and Facilitation

Date: 14/05/2026

Appendix B Correspondence regarding clarification of referred matters

Letter from Inquiry to DTP requesting clarification of Terms of Reference (26 June 2026) (Document 4)

Planning Panels Victoria
Department of Transport and Planning

1 Spring Street
Melbourne Victoria 3000
GPO Box 2392
Melbourne, Victoria 3001
Telephone (03) 5381 9457

26 June 2026

Adam Henson
Acting Executive Director, State Planning Assessment and Facilitation
Department of Transport and Planning
By email: adam.henson@transport.vic.gov.au

Dear Mr Henson

Star of the South Project EES Inquiry

The Terms of Reference for the Star of the South Project Environment Effects Statement Inquiry (Terms of Reference, attached) set out the scope of the Star of the South Victorian Inquiry (Inquiry) at Clauses 9 to 13. The Inquiry is writing to seek clarification on how Clauses 10 and 11 should be interpreted, particularly in relation to construction impacts on Key Victorian Matters and Other Victorian Matters.

Specifically, the Inquiry is seeking clarification on whether its scope is intended to include or exclude consideration of:

- construction impacts associated with the Key Victorian Matters listed in Clauses 10(a) to 10(d)
- construction impacts associated with the Other Victorian Matters listed in Clauses 11(a) to 11(e)
- operational and decommissioning impacts associated with shore (noting the Star of the South project includes shore crossing infrastructure) onshore noise, vibration, soil and waste
- construction impacts associated with offshore noise, vibration, soil and waste
- construction impacts referred to in the Environmental Management Framework or draft Planning Scheme Amendment which relate to matters listed in Clauses 10(a) to 10(d) and Clauses 11(a) to 11(e).

To assist the Inquiry to respond to its Terms of Reference, parties to the Inquiry process will be invited to provide comment on interpretation of the Inquiry's scope at the Directions Hearing scheduled for Tuesday, 14 July 2026. It would be appreciated if you could clarify the intent with regard to these matters before Tuesday, 14 July 2026.

Yours sincerely

Lisa Kendal
Inquiry Chair

Letter from DTP to Inquiry clarifying Terms of Reference (1 July 2026) (Document 5)

Department of Transport and Planning

GPO Box 2392
Melbourne, VIC 3001 Australia
www.transport.vic.gov.au

1 July 2026

Lisa Kendal
Chair
Star of the South Project EES Inquiry
Planning Panels Victoria
By email: office@planningpanels.vic.gov.au

Dear Ms Kendal

STAR OF THE SOUTH PROJECT EES INQUIRY

Thank you for your letter dated 26 June 2026 seeking clarification on the Terms of Reference for the Star of the South Project EES Inquiry.

In response to your queries, it is intended that the following matters are included in the scope:

- Construction impacts associated with the Key Victorian Matters listed in Clauses 10(a) to 10(d).
- Construction impacts associated with the Other Victorian Matters listed in Clauses 11(a) to 11(e).
- Construction impacts associated with offshore works including, but not limited to, noise, vibration, soil and waste, insofar as they occur within Victorian waters and emanate from Victorian works, as per paragraph 10(b).
- Construction impacts referred to in the EMF or draft PSA which relate to matters listed in Clauses 10(a) to 10(d) and Clauses 11(a) to 11(e).

The following matter is not included in the scope:

- Operational and decommissioning impacts associated with onshore noise, vibration, soil and waste.

Thank you again for the opportunity to clarify the terms.

Yours sincerely

Adam Henson
Executive Director State Planning Major Projects

Date: 01/07/2026

Appendix C Submitter conference process

The Terms of Reference require the Inquiry to document the submitter conference process in its Report.

This Report includes:

- the submitter conference dates and meeting locations (see the Overview table)
- a summary of the submitter conference process (see Chapter 3.3(ii) of this Report)
- the list of parties involved in the submitter conference (see Appendix F).

The Inquiry issued the following information to the Proponent and parties in relation to submitter conference process on 7 August 2026 (Document 68).

Purpose

The purpose of the submitter conference is to:

- hear from the Proponent, submitters and experts in relation to Key Victorian Matters referred to the Inquiry
- discuss key issues relating to the Key Victorian Matters.

Principles

In accordance with the Inquiry's Terms of Reference (clause 30), the submitter conference will be based on the following principles:

- it will be conducted in an open, orderly and equitable manner, in accordance with the principles of natural justice;
- the submitter conference needs to be conducted with a minimum of formality and without legal representation being necessary for parties to be effective participants;
- the submitter conference is to be exploratory and constructive, focusing on understanding and resolving matters; and
- adversarial behaviour is not permitted and questioning of experts and submitters needs to be regulated by the Inquiry in the context of resolving matters and these principles.

Process

Submissions

As directed by the Inquiry:

- submissions should focus on Key Victorian Matters
- Other Victorian Matters must not be raised at the submitter conference

The Inquiry will disregard content of any submissions outside of the scope of the Key Victorian Matters.

Theme-based discussion process

The Inquiry Chair will facilitate and regulate the theme-based discussions based on the following process.

- Proponent opening submissions

- expert evidence presentations, in the order proposed by the Proponent and with questions of clarification by the Inquiry (if needed)
- questions and discussion of key issues (if needed):
- questions of experts from the Inquiry
- questions of experts or the Proponent from parties
- follow up questions from the Inquiry
- questions of experts by the Proponent (re-examination)
- Proponent further/reply submissions on the theme (if needed)
- questions of the Proponent from the Inquiry (if needed).

Expert presentations must be in accordance with Inquiry directions 43 -45.

Parties asking questions of an expert must:

- be present for the whole of the expert giving their evidence
- ask clear, concise and relevant questions, directed to matters of fact or professional opinion, that genuinely assist the Inquiry in understanding the issues
- allow the expert time to explain their answer.

Time allocated to ask questions may be limited. The Chair will ask you how much time you will need to ask questions of each expert, and will ask you to keep to your time estimate. You should aim to complete your questions as concisely as possible.

You may be asked to move on to another topic if the line of questioning is not useful to the Inquiry.

Participants

The following people will participate in the theme-based discussions:

- Inquiry members: Lisa Kendal (Chair), Elizabeth McIntosh (Deputy Chair), John Hartigan, Colin McIntosh and Cameron Miller (not all members will attend all days)
- Representatives of the Proponent: Barnaby Chessell SC and Sean McArdle of Counsel (or as advised)
- Experts in the topic area (see timetable)
- One representative from each party who requested to participate (see timetable). Other party representatives may observe.

Appendix D Procedural matters

(i) Request for information

The Inquiry issued the Request for Information (RFI) to the Proponent on 15 July 2026 (Document 16). The Proponent filed its responses to RFI questions 1 to 33 on 31 July 2026 (Document 47) and questions 34 to 52 on 3 August 2026 (Document 52), along with a summary table outlining in which documents the responses to each question could be found (Document 54). Some questions were answered partly through expert evidence.

(ii) Amendments to mapping

On 13 July 2026, the Proponent advised it had become aware of minor errors in the exhibited EES Map Book and Specific Controls Overlay (SCO) mapping within the draft PSA (Document 13) and provided amended maps (Documents 14 and 15).

(iii) Procedural matters raised by Responsible Future before the Directions Hearing

The Inquiry's Directions Hearing notification letter of 2 July 2026 (Document 6) invited parties to raise any procedural issues in writing ahead of the Directions Hearing.

Responsible Future (Illawarra Chapter) Inc. (Responsible Future) wrote to the Inquiry on 9 July 2026 (Document 7) with five procedural requests. The Inquiry responded to these verbally at the Directions Hearing and in its correspondence of 26 July 2026 (Document 22), as summarised in Table 40 below.

Table 40 Inquiry response to procedural matters raised by Responsible Future

Request	Inquiry response
Request for all Victorian baseline ecological data and modelling inputs to be provided before the Submitter Conference	If the Inquiry considers further information is needed to inform its assessment, it will request it from the Proponent. Parties may request information from the Proponent directly.
Request for a clear Victorian-only summary of project impacts and project components within Victorian jurisdiction	A plan delineating the Victorian and Commonwealth works is available in the EES, public notice and on the Proponent's website.
Request for agendas for each Key Victorian Matter to be issued at least one week before the relevant conference session	The timetable for the Submitter Conference will show the days the Key Victorian Matter themes will be discussed. Before the Submitter Conference commences, the Inquiry will provide a list of issues to be addressed during each themed discussion. These will be discussed during preliminary matters on Day 1 of the Submitter Conference.
Request for full disclosure of expert evidence and opportunities for parties to question experts during the Submitter Conference	All documents tabled during the Inquiry process are public documents and will be published on Engage Victoria and uploaded for parties to access through the Dropbox file share.

Request for confirmation that cumulative impacts of works within Victorian waters will be considered during the Submitter Conference	The Inquiry's role includes reviewing and considering cumulative effects arising from the project's Victorian works with other projects anticipated in Victoria (Terms of Reference Clause 4a). The Inquiry has issued a question in its Request for Information relating to cumulative impacts.

(iv) Submission 43 name change request

At the Directions Hearing, Bernadette Gray and Fiona Lawrence advised they wished to participate in the Submitter Conference on behalf of Seaspray Wind Farm Strategy Group, with Ms Gray indicating she also wished to participate as an individual submitter.

The Inquiry received an individual submission from Ms Gray during the exhibition period (Submission 43). The submission did not indicate it was made on behalf of Seaspray Wind Farm Strategy Group, and the Group did not lodge a separate submission.

The Inquiry determined not to allow the change of name on the submission, as Clause 16 of the Terms of Reference requires that submissions are lodged before the close of the submissions period and Clause 17 requires each submission to state the name and address of the person making the submission. As the request was not made until the Directions Hearing, the Inquiry considered it was too late in the process and would not be procedurally fair to effectively allow a new late submission from the Group.

This was confirmed in the Inquiry's correspondence of 22 July 2026 (Document 22). The Group reiterated its request on 25 July 2026 (Document 39), and the Inquiry responded on 29 July 2026 confirming its decision stood (Document 40). Ms Gray participated in the Submitter Conference on her own behalf as an individual submitter.

(v) Evidence of Dr Mike Mackie

The Proponent advised that it would call evidence on fish from Dr Mike Mackie, the technical lead and lead author of *Technical Report C: Fish and Invertebrates*, but that Dr Mackie was unavailable during the Submitter Conference and written submissions process. It advised that Dr Mackie would file an evidence statement but would not appear with the other experts in marine ecology and coastal processes at the Submitter Conference and would not be available to answer written questions.

The Proponent advised that Kim Stewart, who was responsible for the technical review and approval of *Technical Report C: Fish and Invertebrates* and would be appearing as an expert in benthic ecology/marine protected areas, could answer questions on fish in Dr Mackie's absence, with Dr Mackie available to answer any further questions after 17 August 2026.

The Inquiry accepted this proposal and directed that Mr Stewart respond to questions from the Inquiry and parties in writing, with an opportunity for the Inquiry to put any further questions to Dr Mackie after 17 August 2026.

The Inquiry and Submitter 35 put questions to Mr Stewart, to which he responded on 7 August 2026. The Inquiry did not have any further questions for Mr Stewart or Dr Mackie

following the theme-based discussions on marine and coastal environment and processes on 13 August 2026.

(vi) Responsible Future written submission

At the Submitter Conference on 12 August 2026, Responsible Future requested to table a written record of its verbal submission to the Inquiry. The Inquiry agreed for this to be provided in a timely manner.

Responsible Future wrote to the Inquiry on 18 August 2026 outlining questions for the Proponent about various matters including the Key Victorian Matters, matters outside the Inquiry's scope, and the Inquiry process. Despite the late provision of this information, the Inquiry agreed to table and consider it as a written record of Responsible Future's verbal submissions (where relevant to the Key Victorian Matters), as it largely reflected the matters it raised at the Submitter Conference.

The Proponent responded to Responsible Future's submissions (where relevant to the Key Victorian Matters) in its written and verbal closing submissions.

(vii) Late correspondence from No Offshore Turbines Ninety Mile Beach

While the Proponent was presenting its closing submissions on 19 August 2026, No Offshore Turbines Ninety Mile Beach wrote to the Proponent raising questions and issues about the Inquiry's scope and process and the Project's potential environmental impacts (both within and outside the Inquiry's scope).

The Inquiry advised at the conclusion of the Submitter Conference that this information could not be accepted given the late stage of the process. Parties had the opportunity to present their views on the Key Victorian matters and ask questions of the Proponent and experts about the Key Victorian Matters during the theme-based discussions at the Submitter Conference.

Appendix E Submitters to the EES

Sub. no.	Submitter
1	Martine Holberton
2	Robin Gardner
3	Sarah Uilderks
4	Robin Smith
5	Marc Bartsch
6	Robert Caune
7	Charlotte Simpson*
8	Tyler Williams
9	Michelle Kay Sevcikova
10	James Duffus
11	Stephen Ward
12	Judy O'Donnell
13	Tom Holman
14	Environment Protection Authority Victoria
15	Ben Kirkham
16	Sally Everett*
17	Robert J Everett*
18	Diane Wood*
19	Anthony Wolfe
20	Wellington Shire Council*
21	Wildlife Coast Cruises Pty Ltd*
22	Mitchelson Fisheries*
23	Bunurong Land Council Aboriginal Corporation
24	No Offshore Turbines Ninety Mile Beach*
25	Gippsland Climate Change Network*
26	Gippsland Coastal Assembly*
27	Seafood Industry Victoria Inc.*
28	Colin Sachs*
29	Renata Andrews*
30	West Gippsland Catchment Management Authority*
31	National Trust of Australia (Victoria)
32	Carolyn Bowden*
33	Xavier Snowy
34	Friends of the Koalas Inc.
35	Maurice Schinkel
36	David Grace
37	APA Group
38	David Barty
39	Surfers for Climate*
40	Department of Energy, Environment and Climate Action*
41	Kevin Mackin*
42	Zavier Evans*
43	Bernadette Gray*
44	HVP Plantations*
45	Dolphin Research Institute
46	South Gippsland Shire Council*
47	Kimberley Nightingale*
48	Lorraine Bull
49	Responsible Future (Illawarra Chapter) Inc.*
50	Birdlife East Gippsland
51	Committee for Gippsland

* Asterisk denotes submissions identified as raising one or more Other Victorian Matters in Proponent's background and context submission (Document 20)

Appendix F Parties to the Inquiry process

Submitter Conference

Sub. no.	Party	Represented by (submissions)	Experts called
N/A	Star of the South Wind Farm Pty Ltd (Proponent)	Barnaby Chessell SC and Sean McArdle of Counsel, instructed by White & Case	- Brett Lane of Nature Advisory in onshore ecology - Kim Stewart of RPS in benthic ecology/marine protected areas - Dr Claire Greenwell of RPS in seabirds - Dr Janelle Eagle of RPS in marine mammals and turtles - Craig McPherson of Jasco in underwater acoustics - Dr David Provis of Stantec in coastal processes - Ricky Feldman of ALA in onshore Aboriginal Cultural Heritage - Erica Walther of Extent in offshore Aboriginal Cultural Heritage - Tom Evans of Resonate in onshore acoustics - Mark Davidson of AECOM in soils and wastes
13	Tom Holman		
25	Gippsland Climate Change Network	Darren R McCubbin	
27	Seafood Industry Victoria Inc.	Matt Wassnig	
34	Friends of the Koalas Inc.	Maurice Schinkel	
35	Maurice Schinkel		
42	Zavier Evans		
43	Bernadette Gray	Bernadette Gray and Fiona Lawrence	
49	Responsible Future (Illawarra Chapter) Inc.	Presented submissions jointly, represented by Alex O'Brien, Emma Jade, Brad Anderson and Professor Ivan Kennedy	
24	No Offshore Turbines Ninety Mile Beach		

Sub. no.	Party	Represented by (submissions)	Experts called
38	David Barty *(registered to participate but did not attend)*		

Parties that participated in theme-based discussions at the Submitter Conference

Discussion	Parties	Represented by
Onshore ecology	Proponent	Barnaby Chessell SC and Sean McArdle of Counsel
	Friends of the Koalas Inc.	Maurice Schinkel
	Bernadette Gray	Marty Jackson
Marine and coastal environment and processes	Proponent	Barnaby Chessell SC and Sean McArdle of Counsel
	Maurice Schinkel	
	Bernadette Gray	Marty Jackson
	Responsible Future (Illawarra Chapter) Inc.	Alex O'Brien
	No Offshore Turbines Ninety Mile Beach	Emma Jade

Parties that requested to participate in the written submissions process

Sub. no.	Party	Provided further written submissions
N/A	Proponent	Yes
42	Zavier Evans	Yes
6	Robert Caune	No
14	Environment Protection Authority Victoria	No
20	Wellington Shire Council	No
21	Wildlife Coast Cruises Pty Ltd	No
30	West Gippsland Catchment Management Authority	No
38	David Barty	No
46	South Gippsland Shire Council	No
34	Friends of the Koalas Inc.	No
35	Maurice Schinkel	No

Appendix G Document list

No.	Date	Description	Provided by
	2026		
1	14 May	Terms of Reference	Impact Assessment Unit, Department of Transport and Planning (DTP)
2	28 May	Email to Proponent requesting preliminary logistical information	Planning Panels Victoria (PPV)
3	25 Jun	Letter from Proponent to Inquiry providing requested information	Star of the South Wind Farm Pty Ltd (Proponent)
4	26 Jun	Letter to DTP requesting clarification of Terms of Reference	PPV
5	1 Jul	Letter from DTP clarifying Terms of Reference	DTP
6	3 Jul	Directions Hearing notification	PPV
7	9 Jul	Email raising procedural matters	Responsible Future (Illawarra Chapter) Inc.
8	10 Jul	Pre-Directions Hearing letter	PPV
9	6 Jul	Email to Proponent requesting further logistical information ahead of the Directions Hearing	PPV
10	7 Jul	Response providing logistical information ahead of the Directions Hearing	Proponent
11	8 Jul	Email enclosing draft site inspection plan	Proponent
12	8 Jul	Preliminary draft site inspection plan	Proponent
13	13 Jul	Explanatory Note EN001 - Updated Map Book and SCO mapping	Proponent
14	13 Jul	Corrected EES – Attachment I – EES Map book	Proponent
15	13 Jul	Corrected EES – Attachment III – Planning scheme amendment (pages 96-98)	Proponent
16	15 Jul	Inquiry Request for Information	PPV
17	15 Jul	Initial Directions	PPV
18	17 Jul	Expert evidence details	Proponent
19	20 Jul	Terms of Reference interpretation and preferred approach to evidence	Proponent
20	21 Jul	Background and context submission	Proponent
21	22 Jul	Supplementary response to initial directions	Proponent

No.	Date	Description	Provided by
22	22 Jul	Further directions and timetable	PPV
23	23 Jul	Letter to Proponent regarding supplementary response to initial directions	PPV
24	24 Jul	Draft site inspection itinerary	Proponent
25	28 Jul	Letter from EPA dated 24 Jul 2026	Proponent
26	28 Jul	Email from WGCMA dated 24 Jul 2026	Proponent
27	28 Jul	Proponent and WGCMA agreed position on Chapter 26 EMF dated 24 Jul 2026	Proponent
28	28 Jul	Email regarding availability of Dr Mackie	Proponent
29	28 Jul	Expert statement of Janelle Eagle (marine mammals and turtles)	Proponent
30	28 Jul	Expert statement of Mike Mackie (fish)	Proponent
31	28 Jul	Expert statement of Claire Greenwell (ornithology and bats)	Proponent
32	28 Jul	Expert statement of Kim Stewart (benthic ecology and MPA)	Proponent
33	28 Jul	Expert statement of Craig McPherson (underwater noise modelling)	Proponent
34	28 Jul	Expert statement of David Provis (coastal processes)	Proponent
35	28 Jul	Expert statement of Ricky Feldman (onshore Aboriginal cultural heritage)	Proponent
36	28 Jul	Expert statement of Erica Walther (submerged Aboriginal cultural heritage)	Proponent
37	28 Jul	Expert statement of Tom Evans (onshore noise and vibration)	Proponent
38	28 Jul	Expert statement of Mark Davidson (soils and waste)	Proponent
39	29 Jul	Letter requesting submission name change	Sea Spray Wind Farm Strategy Group
40	29 Jul	Response to submission name change request (document 38)	PPV
41	29 Jul	Expert statement of Brett Lane (onshore ecology)	Proponent
42	29 Jul	Email from Proponent responding to Inquiry questions regarding questioning of witnesses	Proponent
43	31 Jul	Email filing documents	
44	31 Jul	Final site inspection itinerary	Proponent
45	31 Jul	Day 1 version – Environmental Management Framework	Proponent
46	31 Jul	Table - Response to expert recommendations	Proponent
47	31 Jul	Response to Inquiry Request for Information - Context and general/common matters and Key Victorian Matters	Proponent

No.	Date	Description	Provided by
48	31 Jul	Response to submissions (Part A and C)	Proponent
49	3 Aug	Questions for Dr Mackie	Maurice Schinkel
50	3 Aug	Process and questions for Dr Mackie and Mr Stewart	PPV
51	3 Aug	Response to Submissions (Part B)	Proponent
52	3 Aug	RFI responses 34 to 52	Proponent
53	3 Aug	Summary response table (response to issues raised in EES submissions)	Proponent
54	3 Aug	Summary response table (response to RFIs)	Proponent
55	5 Aug	Presentation on Key Victorian Matters	Seafood Industry Victoria
56	5 Aug	Media release regarding southern right whale	Maurice Schinkel
57	5 Aug	Further submission on Key Victorian Matters	No Offshore Turbines Ninety Mile Beach
58	6 Aug	Further submission on Key Victorian Matters	Bernadette Gray
59	6 Aug	Version 1 draft Incorporated Document	Proponent
60	6 Aug	Version 2 Environmental Management Framework	Proponent
61	6 Aug	Submission regarding difference in mapping between EPBC variation request and EES map book	Friends of the Koalas Inc
62	7 Aug	Opening submission reference materials	Proponent
63	7 Aug	Gippsland offshore wind transmission 2 GW project overview (VicGrid, March 2026)	Proponent
64	7 Aug	Gippsland Shoreline REZ Order (Victoria Government Gazette, 29 May 2026)	Proponent
65	7 Aug	Victorian works project description	Proponent
66	7 Aug	Gippsland Offshore Wind Transmission 2GW Project - EPBC Referral Decision (7 August 2026)	Maurice Schinkel
67	7 Aug	Further submission on Other Victorian Matters	Zavier Evans
68	7 Aug	Timetable and Distribution List (Version 2)	PPV
69	7 Aug	Issues for discussion at submitter conference	PPV
70	7 Aug	Email regarding attendance of Mr Ryan on Day 1 to explain Victorian works and response from Inquiry accepting	Proponent
71	8 Aug	Response to Questions for Dr Mackie and Mr Stewart	Proponent
72	10 Aug	Timetable (Version 3)	PPV
73	11 Aug	Onshore ecology topic introduction	Proponent
74	11 Aug	Expert presentation of Brett Lane (onshore ecology)	Proponent

No.	Date	Description	Provided by
75	11 Aug	Further submission	Friends of the Koalas
76	12 Aug	Victorian marine environment topic introduction	Proponent
77	12 Aug	Victorian marine environment expert presentation (corrected 13 August 2026)	Proponent
78	13 Aug	AUSVETPLAN avian influenza response strategy v5.3	Proponent
79	13 Aug	Email chain with WGCMA (24 July 2026)	Proponent
80	13 Aug	Questions for Proponent on Aboriginal Cultural Heritage	PPV
81	14 Aug	Questions for Proponent on Other Victorian Matters and some general questions	PPV
82	18 Aug	Timetable (Version 4)	PPV
83	18 Aug	Written submission	Responsible Future
84	18 Aug	Closing submission	Proponent
85	18 Aug	Version 3 Environmental Management Framework	Proponent
86	18 Aug	Response to Aboriginal Cultural Heritage questions	Proponent
87	18 Aug	Response to Inquiry Other Victorian Matters and general questions	Proponent
88	18 Aug	RFI 16 - Summary table of management plans	Proponent
89	18 Aug	Other Victorian Matters MDS extracts	Proponent
90	18 Aug	EMF Response Table	Proponent
91	19 Aug	Email regarding Responsible Future written submission	PPV
92	19 Aug	Statement to Star of the South response to submissions	Wellington Shire Council
93	19 Aug	Email responding to updated EMF and Incorporated Document, with attachments: a) Version 1 draft Incorporated Document with Proponent responses to DEECA submission b) Version 2 Environmental Management Framework with Proponent responses to DEECA submission	Department of Energy, Environment and Climate Action (DEECA)
94	20 Aug	Response to Wellington Shire Council (20 August 2026)	Proponent
95	20 Aug	Response to DEECA (20 August 2026).pdf	Proponent
96	20 Aug	Email regarding submitter conference close and drafting comments process (20 August 2026)	PPV
97	24 Aug	Drafting comments on Proponent's Version 1 draft Incorporated Document	No Offshore Turbines Ninety Mile Beach

No.	Date	Description	Provided by
98	24 Aug	Drafting comments on Proponent's Version 3 Environmental Management Framework	No Offshore Turbines Ninety Mile Beach
99	26 Aug	Drafting comments on Proponent's Version 3 Environmental Management Framework	EPA Victoria
100	26 Aug	Response to No Offshore Turbines Ninety Mile Beach drafting comments	Proponent
101	26 Aug	Comment on mapping	Maurice Schinkel
102	26 Aug	Comments	Bernadette Gray
103	27 Aug	Response to parties' drafting comments and correction to response to DEECA (Document 95)	Proponent
104	27 Aug	Version 2 draft Incorporated Document - clean	Proponent
105	27 Aug	Version 2 draft Incorporated Document - track changes	Proponent
106	27 Aug	Version 4 Environmental Management Framework - clean	Proponent
107	27 Aug	Version 4 Environmental Management Framework - track changes	Proponent

Appendix H Inquiry recommended Environmental Management Framework

The Inquiry's recommended changes to the EMF are based on the Proponent's Version 4 Environmental Management Framework (Document 106) and are shown as:

Tracked Added

~~Tracked Deleted~~

Chapter 26 – Victorian Environmental Management Framework

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Chapter 26 Victorian Environmental Management Framework

The Star of the South Offshore Wind Farm Project is located offshore in the Commonwealth Marine Area and Victorian coastal waters, and onshore in the coastal area of Gippsland, Victoria. Approvals under both Commonwealth and Victorian legislation are therefore required. Two separate Environmental Management Frameworks (EMFs) have been developed to outline how the environmental effects will be managed to comply with the requirements of Commonwealth and Victorian legislation.

This chapter presents the Victorian EMF for the works in Victoria associated with the Star of the South Offshore Wind Farm Project (works in Victoria).

26.1 Introduction

The EMF provides a governance framework for managing the environmental effects of the works in Victoria and includes accountabilities for the implementation of management plans during construction, operation and decommissioning.

As required by section 3.7 of the Scoping Requirements, the EES must include an EMF that describes a transparent framework with clear accountabilities for managing and monitoring the environmental effects and risks associated with the construction, operation and decommissioning phases.

The EMF has been informed by the specialist technical assessments completed as part of the impact assessment, as well as relevant legislation, policies and guidelines. It includes a consolidated list of all the mitigation measures recommended in the technical assessments to avoid, minimise and mitigate potential impacts from works in Victoria to matters that are protected by Victorian legislation.

26.1.1 Delivery approach

The proponent, Star of the South Wind Farm Pty Ltd as trustee for Star of the South Trust (Star of the South), is the entity responsible for delivery of the works in Victoria. To construct, operate and decommission the works in Victoria, a range of contractors will be engaged by Star of the South to undertake packages of work and specialised activities. The Contractors will be required to comply with the requirements of their contract, this EMF and any plans or mitigations required or referred to in this EMF that are relevant to their works package. Contractors will also ensure their sub-contractors comply with relevant requirements of this EMF and the approvals.

26.1.2 Works covered by this framework

This EMF covers works in Victoria and their potential environmental effects and risks that will be regulated by Victorian legislation. It covers the works proposed to be carried out within Victorian jurisdiction onshore and out to three nautical miles offshore, consisting primarily of underground transmission infrastructure.

The Victorian EMF does not address matters regulated by Commonwealth legislation.

The key components and activities covered by this Victorian EMF are described in *Chapter 4 – Victorian Works Project Description* and include:

Within Victorian coastal waters out to 3 nautical miles

- The nearshore transmission and shore crossing infrastructure
    - Up to eight trenchless crossings containing the offshore export cables.

Onshore

- Onshore transmission infrastructure
    - Approximately 30 kilometres of underground cables up to the proposed VicGrid connection hub.
- Temporary construction infrastructure to enable construction.

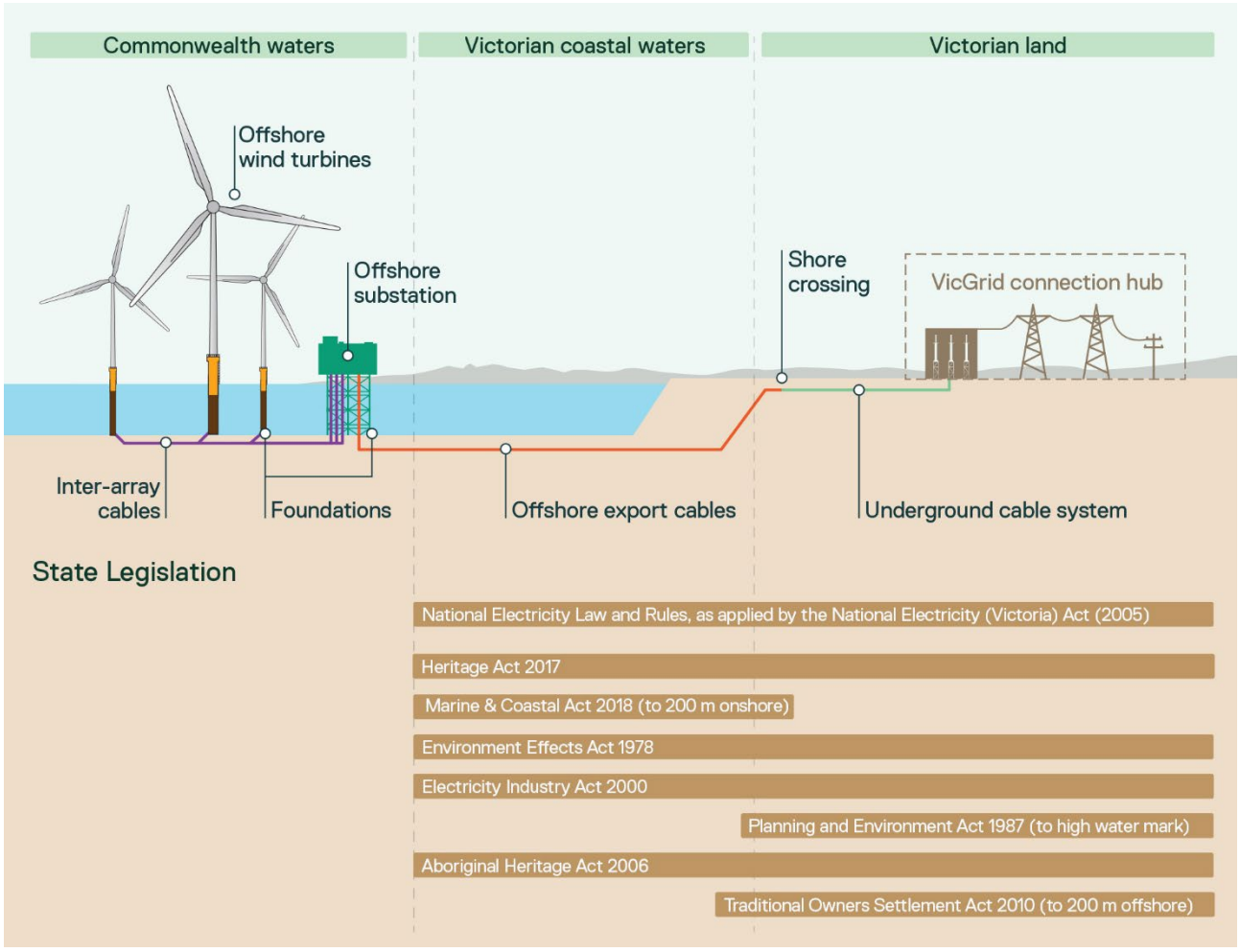
26.2 Statutory context

Star of the South is responsible for preparing an EES for the works in Victoria under the *Environment Effects Act 1978* (Vic) (EE Act).

Different approvals are required for different components for works within the Victorian jurisdiction, as shown in Figure 26-1. The figure illustrates the legislation and different geographical boundaries for the primary approvals required for the works in Victoria. Further information on the regulatory framework for the works in Victoria is provided in *Chapter 5 – Victorian Legislative Framework*.

This section provides the statutory context for approvals required under Victorian legislation only.

Figure -1 Statutory context overview



26.2.1 Primary approvals

Star of the South requires the following primary approvals under Victorian legislation:

- Planning Scheme Amendment under the *Planning and Environment Act 1987* (Vic)
- Consent under the *Marine and Coastal Act 2018* (Vic)
- An approved Cultural Heritage Management Plan under the *Aboriginal Heritage Act 2006* (Vic).

An overview of the primary approval requirements and approval authorities for works within the Victorian jurisdiction is provided in Table 26-1. The primary approvals required under Victorian legislation are further described in *Chapter 5 – Victorian Legislative Framework*.

Star of the South, working with its Contractors, will develop, implement and maintain management plans for the construction, operation and decommissioning of works in Victoria. The plans will be developed to meet the requirements of the primary approvals.

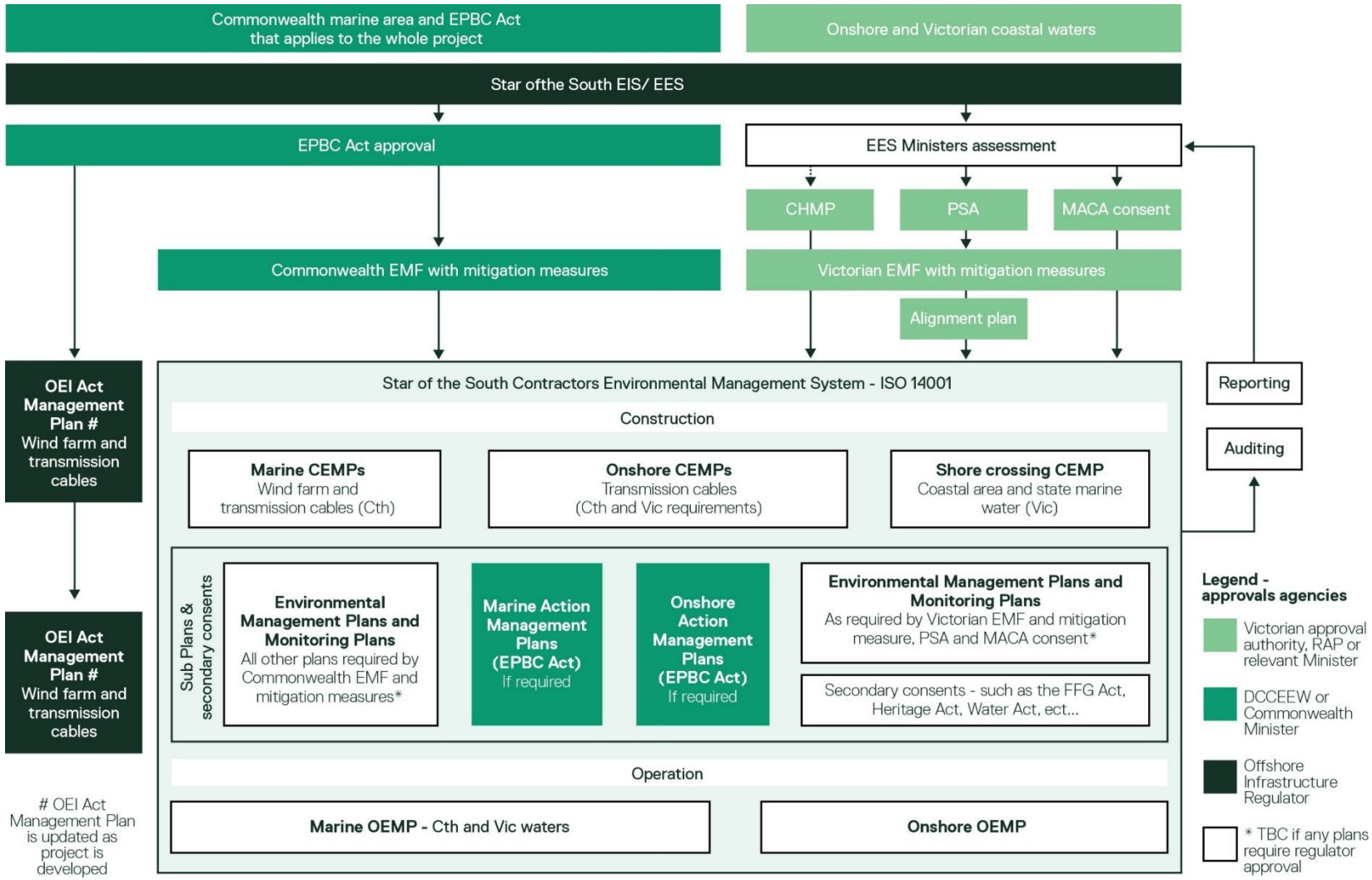
Figure 26-2 provides an overview of the approvals required under Victorian legislation and key plans that are expected to be required to comply with the approvals. A description of these plans relevant to Victorian legislation is provided in Section 26.5.

Table -41 Primary approvals required to comply with Victorian legislation

Legislation	Approval requirements	Approval authority
Planning and Environment Act 1987	The use and development of the land requires approval in accordance with the Wellington Shire planning scheme. Approval is proposed through a Planning Scheme Amendment and introducing a Specific Controls Overlay (SCO) and a new Incorporated Document into the planning scheme with specific controls for the works in Victoria. The draft Incorporated Document requires that the Environmental Management Framework and Alignment Plans are endorsed by the Minister for Planning prior to the commencement of the development, although these may be prepared for stages or components. It also outlines that use and development of the land within the SCO must be generally in accordance with the Environmental Management Framework and Alignment Plans.	Minister for Planning
Aboriginal Heritage Act 2006	A Cultural Heritage Management Plan (CHMP) is required for the works located on shore and within Victorian water. The CHMP will be approved by the Gunaikurnai Land and Waters Aboriginal Corporation as the Registered Aboriginal Party for the onshore project area. The conditions of the CHMP will be managed through the implementation of this Environmental Management Framework and the Star of the South EMS.	Gunaikurnai Land and Waters Aboriginal Corporation

Legislation	Approval requirements	Approval authority
Marine and Coastal Act 2018	Consent is required for the use and development of the marine area in State waters that extends out to three nautical miles and coastal Crown land within 200m inland of the high-water mark. The conditions of the Marine and Coastal Act consent will be managed through the implementation of this Environmental Management Framework and Star of the South Environmental Management System (EMS).	Minister for Environment

Figure -2 Overview of the primary approvals and key plans



26.2.2 Secondary consents

Secondary consents under Victorian legislation will be obtained by Star of the South or its Contractors as required prior to commencing construction, operation or decommissioning of the onshore transmission infrastructure and shore crossing. Secondary consents are described in *Chapter 5 – Victorian Legislative Framework*.

26.2.3 Environment Protection Act duties and obligations

The *Environment Protection Act 2017* (EP Act) is founded on a prevention-based approach to protect human health and the environment from pollution and waste. The EP Act contains environmental duties which apply to all entities undertaking activities that could impact the environment or human health.

The General Environmental Duty is the cornerstone of the EP Act. The General Environmental Duty imposes a continuing obligation on anyone engaging in an activity that may give rise to a risk to human health and the environment from pollution or waste to take action to eliminate or reduce that risk as far as reasonably practicable. Doing what is reasonably practicable means putting proportionate controls in place to eliminate or reduce the risks of harm. A breach of the General Environmental Duty can lead to criminal or civil penalties.

Section 25(4) of the EP Act requires certain steps to be taken to eliminate or reduce risks, such as ensuring the handling, storage and transport of substances (for example soil) are appropriately managed, requires controls to be continually evaluated and that staff are adequately trained in compliance with the General Environmental Duty. Section 25(5) imposes requirements on a person who designs equipment or structures, making them explicitly subject to the General Environmental Duty.

A systems and risk-based approach was adopted for the EES to assess the impacts of works in Victoria (refer to Chapter 6 – Assessment Framework). This approach considers the potential risks and impacts to the environment and human health through detailed assessments of works in Victoria which in turn have informed the development of mitigation measures to address potential impacts during the construction, operation and decommissioning phases of works in Victoria.

Star of the South and its Contractors will each develop and implement an Environmental Management System to provide a systematic approach for monitoring and evaluating compliance with approval conditions. The environmental management system will also require processes to implemented that identify opportunities for continual improvement in environmental management and respond to any changing conditions throughout works in Victoria (see Section 26.4). Effective implementation of the Star of the South and contractors' Environmental Management System will assist in achieving the General Environmental Duty through the systems and processes applied and regular review undertaken of evaluate compliance with approval conditions to minimise impacts to human health and the environment.

26.3 Roles and responsibilities

Star of the South will be responsible for overseeing the delivery of works in Victoria including stakeholder and community engagement, approvals, design, construction, operation and decommissioning. Contractors will be engaged to design, construct and operate works in Victoria in accordance with the approvals and required management plans.

The roles and responsibilities in relation to environmental management are outlined in Table 26-2.

Table -42 Key roles and responsibilities for the Victorian EMF

Stakeholder	Role	Responsibility
Victorian Minister for Planning	Decision making and regulation	The Minster for Planning will prepare an assessment of the environmental effects of works in Victoria. Consider the Planning Scheme Amendment and determine if approval should be issued. Review and approve the EMF as a condition of the Incorporated Document. Review and approve the Alignment Plan(s). Receive and review annual environment reports during construction and for 2 years during operation, or as otherwise agreed with the Minister for Planning.
Victorian Minister for Environment	Decision making and regulation	The Minister for Environment will determine if a consent should be issued for works in Victoria activities under the MAC Act for works undertaken in the marine environment out to 3 NM and coastal crown land up to 200 m inland of the highwater mark. Receive and review annual environment reports during construction and for 2 years during operation where relevant to the conditions of the MAC Act consent, or as otherwise agreed with the Minister for Environment. The Minister for Environment (delegated to the Department of Energy, Environment and Climate Action (DEECA)) will be responsible for the issue of a licence for the occupation of Crown land for commercial activities.
Victorian Department of Transport and Planning	Engage and review documents	Review, comment, and engage with Star of the South and its Contractors through development of relevant plans and documents as required by the EMF with mitigation measures and Incorporated Document. Receive and review annual environment reports during construction and for 2 years in operation where required, or as otherwise agreed with the Minister for Planning.
Key regulatory authorities*	Decision making and regulation	Review, where required approve, relevant secondary consents ensuring any relevant approval conditions have regard to the mitigation measures outlined in the EES. Administer and enforce relevant approvals. Review, and where required, approve relevant environmental management plans as required under the relevant approvals.
Gunaikurnai Land and Waters Aboriginal Corporation	Decision making and regulation	Review the CHMP as the Registered Aboriginal Party and determine if it should be approved.

Stakeholder	Role	Responsibility
Star of the South	Proponent	Obtain and comply with key Victorian statutory approvals including: • Planning Scheme Amendment under the *Planning and Environment Act 1987*, including Environmental Management Framework (as required by the Incorporated Document) • Consent under the *Marine and Coastal Act 2018* • Approved Cultural Heritage Management Plan. Develop and implement an Environmental Management System. Mandate compliance with all relevant approvals, mitigation measures and any other environmental management plans required to comply with approvals and the contracts during construction, operation and decommissioning. Evaluate environmental management capability as part of contractor selection process to confirm they have the qualifications, competencies and supervision necessary to achieve compliance with approvals and management plans. Review environmental management plans prepared by Contractors prior to being submitted to statutory authorities for approvals pursuant to relevant statutory approvals. Audit and monitor Contractor compliance with approved mitigation measures, environmental management plans and approvals conditions and take corrective action where required. Submit relevant environment reports to the applicable regulator(s) and where required by legislation or approval conditions to outline the environmental performance of Star of the South. Conduct stakeholder and community engagement as required.
Contractors	Design, construction, operation and decommissioning (as relevant to the scope of the respective contract)	Comply with environmental laws and environmental approval conditions, including preparing and implementing environmental management plans. Develop and implement plans required to comply with approval conditions and the Victorian EMF. Manage any Sub Contractors to ensure compliance with approval conditions, management plans and the Victorian EMF. Obtain any additional permits and approvals required to design, construct or operate works in Victoria that are the subject of the contract (other than the approvals to be obtained by Star of the South). Develop and implement environmental management systems consistent with AS/NZS ISO 14001:2015. Comply with approved environmental management plans during delivery and take corrective action where required. Conduct stakeholder and community engagement as required.

*Key Victorian regulatory authorities will include Department of Transport and Planning, Department of Environment, Energy and Climate Action, Environment Protection Authority Victoria, Heritage Victoria, West Gippsland Catchment Management Authority, Wellington Shire Council

26.4 Environmental Management System (EMS)

An Environmental Management System (EMS) provides an organisation with a framework and systematic approach to achieving its objectives for environmental management and sustainability and driving continuous improvement.

Star of the South will maintain its own EMS that will cover all activities that are proposed to be undertaken across the Star of the South Offshore Wind Farm Project. It will apply systems and procedures to monitor and review compliance of Contractor activities with Victorian and Commonwealth approvals.

Contractors involved in the construction, operation and decommissioning of works in Victoria will also have an EMS to guide environmental management across the key works packages. Contractors must have an EMS that is in accordance with AS/NZS ISO 14001:2015.

Consistent with AS/NZS ISO 14001:2015, each EMS will address the following:

- Leadership and commitment
- Environmental policy
- Roles and responsibilities for environmental management
- Environmental risk and opportunity assessment and actions to address these
- Requirements for setting and achieving objectives and achieving compliance with environmental legislation, approval conditions and consents
- Requirements for competency and awareness
- Communication and reporting
- Management of documentation and records
- Operational control including emergency preparedness and response
- Monitoring procedures and internal and external audit program
- Processes for responding to incidents and non-conformance and implementing corrective and preventative action
- Review and continual improvement.

Using this approach, the systems and procedures developed and implemented by Contractors will provide a high level of assurance that environmental issues associated with works in Victoria will be effectively monitored and controlled during construction, operation and decommissioning of works in Victoria.

26.4.1 Star of the South EMS

Key components of the Star of the South EMS will be an audit plan and schedule, and a Compliance Plan. These documents will be progressively updated as the works in Victoria progresses through design, construction, operation and decommissioning phases.

The audit plan and schedule will set out Star of the South's approach to auditing the works of each Contractor. A risk-based approach will be adopted to determine the priorities for the auditing plan, which will be reviewed and updated as required. Compliance with all mitigations will also be audited by Star of the South annually (as a minimum) where relevant activities are being undertaken.

Audits will include reviewing and verifying that Contractor’s environmental management documents comply with the Victorian EMF and approval conditions prior to commencement of construction.

The Compliance Plan will outline the approach to managing compliance in accordance with approvals under both Commonwealth and Victorian legislation for the Star of the South Offshore Wind Farm Project. The Compliance Plan will include:

- A summary of the key applicable environmental legislation and approvals and associated conditions.
- Roles and responsibilities for managing compliance with key environmental legislation and approvals.
- Consolidated requirements from both the Commonwealth and Victorian EMFs including a high-level summary of the approval conditions
- An overview of the management plans, procedures and other documents that address the approval conditions.
- A matrix outlining the mitigation measures from both EMFs and which management plans, procedures or documents address the mitigation measures.

Star of the South will engage auditors with relevant qualifications, expertise and experience to review and verify documents and audit activities.

26.4.1.1 Document change management

The Star of the South EMS will include a procedure for managing changes to environmental management documentation. Revisions to the environmental management documents described in Section 26.5 may be required through the delivery of works in Victoria. The change may be:

- Minor changes – improvements or clarifications to environmental management practices, minor changes in work practices, new controls being implemented. Minor changes will not introduce new or increased environmental risk or impacts.
- Major changes – significant changes to environmental management procedures, or construction methods. Major changes will have the potential for new or increased environmental risks or impacts.

Documents that require a major change will be subject to the review and approvals as outlined in Table 26-3 and Table 26-5 in Section 26.5.

26.4.2 Risk management

The Star of the South EMS will include procedures for risk management during implementation, including maintenance of a risk register which will be updated as required considering new information, monitoring results, and the findings of audits.

The EES considered environmental risks that could occur due to unplanned event or accidents during construction, operation and decommissioning. These risks will be considered as a starting point for the risk register to be maintained during works in Victoria.

The Star of the South environmental risk register will be maintained as part of the EMS and reviewed on a regular basis to ensure it remains relevant and adequately considers risks throughout implementation.

26.5 Environmental management documents

Environmental management documents must be prepared to document how Star of the South and its Contractors will comply with the statutory approvals and how management, mitigation and monitoring measures will be implemented to manage the environmental effects of works in Victoria.

The statutory approvals for works in Victoria will be implemented through a series of documents required as conditions of statutory approvals. These documents will outline how compliance with relevant standards, guidelines and statutory approval obligations, as outlined in Section 26.2, will be achieved and to reflect the mitigation measures outlined in Section 26.7.

Documents prepared by contractors will be required to align with the documents and mitigation measures referenced in the statutory approvals and consents where relevant, as they detail mandatory conditions and contingency measures to protect environmental and social values throughout the life of works in Victoria.

Different plans will be required for the different components to meet the applicable statutory approvals and scope of works allocated to Contractors. It is expected that there will need to be separate management plans for the onshore transmission cable works and the shore crossing in the coastal and marine environment. The need for separate plans will be confirmed in consultation with regulators prior to works commencing.

Before each phase begins (construction, operation, decommissioning), Star of the South or its Contractors will obtain any further statutory approvals or secondary consents (e.g. approvals of management plans that are required by conditions of consent), as described in *Chapter 5 – Victorian Legislative Framework*.

Prior to construction, all documents prepared by the Contractors will be reviewed by Star of the South. The following sections outline the environmental management documentation that Star of the South and its contractors will prepare and implement to address Victorian approvals. The environmental management documentation must comply with this Environmental Management Framework and approval conditions and address relevant legislation and contractual requirements.

26.5.1 Construction

Separate Construction Environment Management Plans (CEMPs) will be prepared by each Contractor for the onshore transmission infrastructure and the shore crossing/near shore works in the coastal and marine environment. The CEMPs will describe how the requirements of the Victorian EMF and mitigation measures will be complied with and implemented during construction and commissioning. An overview of the content and approval of the CEMPs is presented in Table 26-3.

The shore crossing CEMPs will specifically address the requirement of the MAC Act consent, relevant conditions of the Incorporated Document and this Environmental Management Framework. The onshore transmission CEMPs will address the requirements of this Environmental Management Framework and conditions of the Incorporated Document. As outlined in the Commonwealth EMF, the shore crossing and onshore CEMPs will also address requirements of the EPBC Act approval for any specific controls, where required.

Activities for installation and operation of the offshore transmission cable occurs in both Commonwealth waters and State waters. Therefore, there will be overlap in the management plans that will be relevant to managing impacts in both Commonwealth waters under the EPBC Act, and State waters under the MAC Act.

Separate documentation will need to be prepared to meet the conditions of Commonwealth and Victorian approvals, where required. The need for separate plans will be determined in consultation with regulators prior to works commencing. However, to avoid inconsistencies in approaches outlined in the documentation, the same mitigation measures will be included in the plans for both jurisdictions. These plans will be developed in consultation with relevant Commonwealth and Victorian agencies, where required by the mitigation measures or approval conditions.

The same sub plans will be used by all contractors for marine works so that a consistent approach is applied across all activities occurring within the marine project area, whether within Victorian or Commonwealth waters.

The following topics will require the same measures to be included in management plans under the EPBC Act~~, OEI Act~~ and MAC Act for the transmission cable constructed in Commonwealth and Victorian waters:

- Ballast water management
- Spills and oil pollution prevention and management
- Underwater cultural heritage management
- Vessel movements and marine operations including re-fuelling, operational lighting.

Table -43 Approach to preparation of CEMPs

Document	Description	Responsibility
Construction Environmental Management Plans (CEMPs) Onshore transmission infrastructure Shore Crossing and export cables in state waters	Contractors will develop and implement a CEMP for their package of works as required by their contract and in accordance with the relevant statutory approval, the EMF and mitigation measures, to outline how they will comply with approval conditions during construction and commissioning. The CEMPs will be prepared in consultation with agencies relevant to the works covered in the CEMP and sub plans. The CEMP will include details of processes and responsibilities for: • Achieving compliance with approval conditions, secondary consents, permits and relevant legislation for construction • Achieving compliance with any relevant EPBC Act approval requirements onshore and within State waters for construction • Identifying, mitigating, monitoring and managing environmental risks and issues during construction to address all requirements outlined in the mitigation measures provided in Table 26-7 • Applying environmental objectives, performance criteria, corrective actions and timing for each environmental issue • Site inductions, training, competency and awareness • Communication and reporting • Environmental monitoring, reporting and auditing requirements • Managing complaints, incidents, nonconformance • Emergency preparedness and response • Review and continual improvement.	**Owner**: Contractors **Review**: Star of the South **Accept**: Star of the South

Document	Description	Responsibility
Other plans required by the mitigation measures	The mitigation measures (section 26.7) set out requirements to develop and implement relevant management plans to avoid, minimise and mitigate impacts. These plans are required to be prepared by a suitably qualified and experienced personnel and reviewed annually to confirm they are adequately addressing the impacts of works as they progress. Plans will be prepared in consultation with relevant agencies as required by the mitigation measures. Where appropriate, the management plans required by these mitigation measures may be included as part of the CEMP rather than stand-alone plans. Plans required to comply with the conditions of the MAC Act consent, FFG Act and Wildlife Act approvals will be prepared in consultation with and approved by DEECA. These plans will be referenced in the relevant CEMPs. Monitoring plans will also be prepared in response to mitigation measures and to verify compliance. These monitoring plans will be referenced in the CEMPs, where relevant.	**Owner**: Contractors unless otherwise specified by the mitigation measures **Review**: Star of the South **Accept**: Star of the South OR **Approve**: DEECA for plans relating to the shore crossing for MAC Act consent, and any plans required under the FFG Act and Wildlife Act (assuming plans are a condition of the respective legislative approvals)
Communications and Stakeholder Engagement Plan - construction	A Communications and Stakeholder Engagement Plan will guide consultation with Traditional Owners, stakeholders and communities during the construction phase ~~and meet requirements of the OEI Act~~. Star of the South will prepare an overarching plan that sets out the principles and framework that will be implemented by Star of the South and its contractors. Where required, Contractors will prepare a subplan to the Communications and Stakeholder Engagement Plan relevant to their specific construction activities, which complies with the Star of the South overarching plan.	**Owner**: Star of the South and Contractors **Review**: Star of the South **Accept**: Star of the South

Table 26-4 outlines the sub plans required for construction that are recommended in the mitigation measures in the EES technical studies and their consultation and/or approval requirements. Note that the responsibilities for these plans in terms of owner, reviewer and accepter are outlined in Table 26-3.

Table 26-44 List of CEMP sub plans and other management documents

CEMP sub plans and other management documents	Relevant mitigation(s)	Consultation/approval requirements
Communications and Stakeholder Engagement Plan	SOC-M003, BTM-M001, TTP-M001	Wellington Shire Council - consult
Traditional Owner Engagement Plan	ACH-M006	Traditional Owners including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the project - consult

CEMP sub plans and other management documents	Relevant mitigation(s)	Consultation/approval requirements
Cultural Heritage Management Plan	ACH-M001, SCH-M003, SCH-M007	Registered Aboriginal Party (Gunaikurnai Land and Waters Aboriginal Corporation) - approve
Traffic Management Plan	TTP-M002, BTM-M002	Relevant road authorities (including Wellington Shire Council) - consult
Property Management Plan(s)	AGM-M002	Farm/forestry owner/manager - consult
Community benefit fund	BTM-M003	Community and Councils - consult
Workforce Development Strategy	BTM-M005	Councils and other relevant stakeholders - consult
Workforce Accommodation Strategy	SOC-M001, BTM-M006	Relevant Councils and accommodation providers - consult
Environmental Line List	FFM-M002	DEECA - consult
Flora and Fauna Management Plan	FFM-M005, FFM-M006	DEECA - consult
Biosecurity Management Plan	FFM-M007, AGM-M005	DEECA, Wellington Shire Council, agricultural specialists, affected landowners and Agriculture Victoria - consult
Protocol for works within Conservation Reserves	FFM-M009	Parks Victoria and DEECA - consult
Designated Waterway Crossing Management Plan	FFM-M010	DEECA and West Gippsland Catchment Management Authority - consult
Rehabilitation and Reinstatement Plan	FFM-M013	DEECA, West Gippsland Catchment Management Authority, and relevant landowners/land managers (including Wellington Shire Council) - consult
Acid Sulfate Soil Management Plan	GWM-M003, SUM-M006, SOL-M005	Nil
Surface water management plan	SUM-M001, SUM-M002, SUM-M003, SUM-M007, SUM-M008, SUM-M015	West Gippsland Catchment Management Authority
Construction Noise and Vibration Management Plan	ONV-M001	Nil
Dewatering Plan	FFM-M014	Nil
Soil excavation staging strategy	SOL-M003	Nil
Disposal Plan - spoil	SOL-M008	Wellington Shire Council
Proposed drilling profile design and work method statement - trenchless waterway crossing (as part of Water Act consent)	SUM-M005	West Gippsland Catchment Management Authority - approve
Site access strategy	TTP-M005	Relevant road authorities and other stakeholders such as landowners - consult
Spill response plan#	SPL-M02	~~Nil~~ Department of Transport and Planning - consult
Underwater cultural heritage management plan	UMH-M003	Heritage Victoria, Gunaikurnai Land and Waters Aboriginal Corporation, and First Peoples–State Relations - consult
Vessel passage plan#	SNV-M07	Gippsland Ports Harbour Master - consult
Fisheries Liaison and Coexistence Plan#	CRF-M08, CRF-M09	Nil

CEMP sub plans and other management documents	Relevant mitigation(s)	Consultation/approval requirements
Plans required to comply with the conditions of: • MAC Act consent, (including Marine mammal and turtle monitoring and management plan#) • Flora and Fauna Guarantee Act and (if required) • Wildlife Act (if required)	UWN-M06, UWN-M15, VES-M06, VES-M09, VES-M10, VES-M11	DEECA - approve DEECA - approve DEECA - approve
Marine Operation Framework#	VES-M06, VES-M07, VES-M08, VES-M09, VES-M10, VES-M11	Nil

Note - #: As relevant to works in Victorian coastal waters

26.5.2 Operation

During operation each Contractor will prepare any required Operational Environmental Management Plans (OEMPs) for marine and onshore operational activities.

An overview of content and approval of the OEMP and other plans required to comply with mitigation measures is presented in Table 26-5.

Table -45 Approach to preparation of OEMPs

Document	Description	Responsibility
Onshore Transmission infrastructure OEMPs - for each Contractors works package	Contractors will develop and implement an OEMP for their scope of work for the onshore transmission infrastructure, as required by the contract and in accordance with the mitigation measures. The OEMPs will be prepared in consultation with agencies relevant to the works covered in the plan. The OEMPs will include details of processes and responsibilities for: • Achieving compliance with the approval conditions and relevant Victorian legislation for operation • Achieve compliance with any relevant EPBC Act approval requirements onshore and within State waters for operation • Identifying, mitigating, managing and monitoring environmental risks and issues during operation to address all requirements outlined in the mitigation measures provided in Table 26-7. • Applying environmental objectives, performance criteria, corrective actions and timing for each environmental issue • Site inductions, training, competency and awareness to all personnel engaging in activities associated with operation. • Communication and reporting • Environmental monitoring, reporting and auditing requirements • Managing complaints, incidents, nonconformance • Emergency preparedness and response • Review and continual improvement.	**Owner**: Contractors **Review**: Star of the South **Accept**: Star of the South
Other plans required by the mitigation measures	The mitigation measures (section 26.7) set out requirements to develop and implement relevant management plans to avoid, minimise and mitigate impacts. These plans will be prepared by a suitably qualified and experienced personnel and reviewed annually to confirm they are adequately addressing the impacts of operation activities. Plans will be prepared in consultation with relevant agencies as required by the mitigation measures. Where appropriate, the management plans required by these mitigation measures may be included as part of the OEMP rather than stand-alone plans. Monitoring plans will also be prepared in response to mitigation measures and to verify compliance. These monitoring plans will be referenced in the OEMP where relevant.	**Owner**: Contractors unless otherwise defined by the mitigation measures **Review**: Star of the South **Accept**: Star of the South

Document	Description	Responsibility
Communications and Stakeholder Engagement Plan - operation	Communications and Stakeholder engagement plans will be required to guide consultation with stakeholders and Traditional Owners during operation of works in Victoria. Star of the South will review and update the overarching Communications and Stakeholder Engagement Plan prepared for construction of works in Victoria to reflect the operational requirements for works in Victoria. This will be done prior to the commencement of operation. The plan will set out the principles and framework for the community, stakeholder and Traditional Owner consultation to be undertaken by Star of the South and its contractors during the operation phase. Each Contractor will prepare a plan specific to their operational activities that complies with the Star of the South overarching plan (as required).	**Owner**: Star of the South and Contractors **Review**: Star of the South **Accept**: Star of the South

Table 26-6 outlines the sub plans required for operation that are recommended in the mitigation measures in the EES technical studies and their consultation and/or approval requirements. Note that the responsibilities for these plans in terms of owner, reviewer and accepter are outlined in Table 26-5.

Table 26-46 List of OEMP sub plans and other management documents

OEMP sub plans and other management documents	Relevant mitigation(s)	Consultation/approval requirements
Communications and Stakeholder Engagement Plan	SOC-M003, BTM-M001, TTP-M001	Wellington Shire Council - consult
Traditional Owner Engagement Plan	ACH-M006	Traditional Owners including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the project - consult
Cultural Heritage Management Plan	ACH-M001, SCH-M003, SCH-M007	Registered Aboriginal Party (Gunaikurnai Land and Waters Aboriginal Corporation) - approve
Property Management Plan(s)	AGM-M002	Farm/forestry owner/manager - consult
Community benefit fund	BTM-M003	Community and Councils - consult
Workforce Development Strategy	BTM-M005	Councils and other relevant stakeholders - consult
Workforce Accommodation Strategy	SOC-M001, BTM-M006	Relevant Councils and accommodation providers - consult
Environmental Line List	FFM-M002	DEECA - consult
Flora and Fauna Management Plan	FFM-M005, FFM-M006	DEECA - consult

OEMP sub plans and other management documents	Relevant mitigation(s)	Consultation/approval requirements
Biosecurity Management Plan	FFM-M007, AGM-M005	DEECA, Wellington Shire Council, agricultural specialists, affected landowners and Agriculture Victoria - consult
Rehabilitation and Reinstatement Plan	FFM-M013	DEECA and relevant landowners/land managers (including Councils) - consult
Spill response plan#	SPL-M02	~~Nil~~ Department of Transport and Planning - consult
Underwater cultural heritage management plan	UMH-M003	Heritage Victoria, Gunaikurnai Land and Waters Aboriginal Corporation, and First Peoples–State Relations - consult
Vessel passage plan#	SNV-M07	Gippsland Ports Harbour Master - consult
Fisheries Liaison and Coexistence Plan#	CRF-M08, CRF-M09	Nil
Plans required to comply with the conditions of: • MAC Act consent, (including Marine mammal and turtle monitoring and management plan#) • Flora and Fauna Guarantee Act and (if required) • Wildlife Act (if required)	UWN-M06, UWN-M15, VES-M06, VES-M07, VES-M08, VES-M09, VES-M11	DEECA - approve DEECA - approve DEECA - approve
Marine Operation Framework#	VES-M06, VES-M07, VES-M08, VES-M09, VES-M11	Nil

Note - #: As relevant to works in Victorian coastal waters

25.5.3 Decommissioning

As decommissioning activities will occur well into the future, it is not possible to specify the detailed requirements of the decommissioning environmental management plan now. The Decommissioning Environmental Management Plan will be prepared toward the end of the infrastructure life in accordance with the following principles:

- Consideration of current legislation and policy at the time of decommissioning activities
- Consultation with relevant regulators
- Assessing environmental conditions at the time of decommissioning and identify if any remediation is required if contamination has occurred as a result of works in Victoria
- Developing and implementing measures to avoid, minimise and mitigate environmental impacts
- Adopting best practice approaches to decommissioning offshore wind infrastructure at the time of the proposed activities.

The Decommissioning Environmental Management Plan will be subject to regulator approval prior to the commencement of decommissioning activities.

The plan will include, but not be limited to:

- Details on onshore infrastructure proposed to be removed or left in situ
- Assessment of potential impacts of decommissioning activities for the removal or retention of infrastructure
- Specify how activities associated with decommissioning will be carried out in accordance with the approval conditions
- Describe measures to be implemented to avoid or reduce impacts arising from the removal of infrastructure (if required)
- Consider management measures adopted in construction and apply where similar impacts could occur.

The Star of the South Communications and Stakeholder ~~e~~Engagement ~~p~~Plan and Traditional Owner Engagement Plan will also be updated and implemented to guide consultation with stakeholders in advance of and during decommissioning.

26.6 Evaluating compliance

Compliance with approvals will be evaluated through monitoring, auditing and reporting. Where outcomes of mitigation measures do not achieve the expected results, corrective actions or adaptive management procedures will be implemented.

The Star of the South EMS will include an audit plan and schedule, and a compliance plan (refer section 26.4.1). Audits will review compliance with the Victorian EMF, mitigation measures and approval conditions prior to and during construction. The compliance plan will outline the approach to managing compliance in accordance with approvals for the Star of the South Offshore Wind Farm Project under both Commonwealth and Victorian legislation.

Contractors will be required by Star of the South to evaluate their own compliance with approvals throughout the delivery of works in Victoria by monitoring and internal auditing. Star of the South will also monitor and audit the Contractor's management plans and works to confirm compliance with approval conditions and environmental outcomes prior to and during construction.

During operations, environmental compliance with the statutory approvals will be monitored and audited in accordance with the Contractors EMS.

26.6.1 Baseline environmental conditions

The baseline environmental conditions that have informed the impact assessments presented in the EES are described in technical reports A to Z. These conditions and any additional baseline data collected prior to construction will also be used to evaluate the effectiveness of proposed mitigation measures.

All relevant data sets collected as part of the EES environmental assessment will be assembled and made accessible by Star of the South to its contractors, where required, to confirm potential impacts and assess the effectiveness of mitigation measures being implemented.

Star of the South or its Contractors will be responsible for any pre-construction surveys required to inform final design, and ongoing collection and management of monitoring data to comply with approvals.

26.6.2 Monitoring

Monitoring programs will form a key part of the process for confirming that mitigation measures are effective and that impacts are being managed.

Monitoring is required by some of the mitigation measures recommended by technical specialists. Monitoring will also be undertaken where there are areas of uncertainty about or gaps in existing data about a species, environmental condition or effectiveness of mitigation measures in the specific works location.

Monitoring plans will be developed by Star of the South and/or Contractors in accordance with the approval conditions and mitigation measures. Experienced technical specialists will be engaged to assist with preparing required monitoring plans.

The monitoring plans will:

- Outline monitoring objectives
- Address relevant regulations, guidelines, approval conditions and mitigation measures
- Detail the methods, parameters, locations, and frequency
- Outline the duration of the required monitoring program
- Outline trigger levels for review of controls and implementing adaptive management
- Reporting requirements.

Monitoring data will be used to inform adaptive management and to demonstrate compliance with approval conditions, where relevant.

Monitoring plans will also outline the frequency that plans must be reviewed to consider:

- If the monitoring program extent, frequency and range of parameters are sufficient to identify if mitigation measures are being effective
- Have there been changes in construction approach or program that needs to be reflected in the monitoring plans
- Any updates are required based on the outcomes of monitoring data review or implementing adaptive management procedures.

The monitoring plans will become sub plans to the CEMPs and OEMP, where relevant.

26.6.3 Adaptive management

Adaptive management procedures will be developed to determine when additional or revised mitigation measures are required during delivery. The adaptive management procedures will enable management of impacts in accordance with approval conditions and environmental outcomes to be achieved when changes occur or new information becomes available.

The adaptive management procedures may be triggered through review of monitoring data, additional surveys, identifying higher levels of impact than expected, evidence of new impacts or other unexpected outcomes, or if other new information becomes available. Triggers for when the adaptive management procedures will be applied will be outlined in the:

- Detailed monitoring plans
- EMS procedure for data review and continuous improvement.

26.6.4 Auditing

Contractors will prepare an audit plan and establish an internal audit process for their works and their sub-contractors prior to the start of construction. The audit plan and internal audit process can be prepared in stages. The audit plan will define the frequency of internal audits and action triggers. The internal audits are to be undertaken by the Contractor during construction and at the commencement of each new phase of construction to evaluate compliance with CEMPs. The frequency of the audits will be determined based on the following criteria: risk level, project phase, compliance history and environmental sensitivity.

Star of the South will also conduct audits at agreed intervals to monitor the compliance with the mitigation measures, management system obligations, statutory approvals conditions and relevant legislation and guidelines throughout all phases of the works in Victoria. As described in Section 26.4.1 Star of the South will develop and implement an audit plan and schedule as part of the EMS. The audit plan will be informed by the regulatory approval requirements applying to the works in Victoria.

The audits completed by Star of the South will evaluate:

- Compliance with all relevant mitigation measures contained in environmental management plans
- Compliance with statutory approvals conditions issued for the works in Victoria

- Conformance with any other relevant environmental management documentation
- Responses to non-conformances, complaints and incidents
- Compliance with safety requirements
- Implementation of monitoring programs.

Conformance and compliance will be assessed through a range of inspections, observations of works, consultations with the proponent, operators and contractors, reviews of records and meeting minutes.

A summary of the audits will be provided to the Minister for Planning, Minister for Environment and the Victorian Department of Transport and Planning as part of the annual environmental report prepared by Star of the South. Reports will be provided during construction and for 2 years in operation, unless otherwise agreed.

26.6.5 Complaints management

Following receipt of approvals, Star of the South will develop a complaints management system in accordance with relevant standards and guidelines. The objectives of the complaints management process for works in Victoria will be to:

- Resolve stakeholders' concerns or complaints with works in Victoria in a timely fashion.
- Apply learnings from a concern or complaint to reduce the likelihood of complaints or concerns as the works in Victoria progresses.
- Provide accessible and clear lines of communication for the community to be able to contact Star of the South.

The process will include:

- Engaging with complainant: understanding the details of the complaint being raised
- Investigation of the complaint
- Closing the loop: providing feedback to complainant on what has been done to resolve the issue
- Record keeping: documenting the details of complaints, investigations undertaken and actions taken in response.

26.6.6 Reporting

Star of the South and its Contractors will be responsible for reporting compliance with mitigation measures and statutory approvals conditions to regulators. Reporting and external notification requirements will be outlined in the EMS Compliance Plan including which matters require reporting, to which party and the timeframe within which the reporting should occur.

Annual environmental reports will be prepared by Star of the South that outlines the environmental performance of works in Victoria. The report will be provided to the Minister for Planning, Minister for Environment and the Victorian Department of Transport and Planning, and made available on the Star of the South's website.

Reporting will address statutory approval requirements and include:

- Monitoring results and reporting against triggers outlined in monitoring plans
- Compliance with requirements
- Non-conformances and corrective actions
- Complaints register and responses
- Notifications to the Registered Aboriginal Party and First Peoples State Relations, if a potential Aboriginal site or artefact is identified
- Environmental incident notifications.

26.7 Mitigation measures

Mitigation measures were recommended by technical specialists as part of the impact assessments completed for works in Victoria. Mitigation measures have been identified to further avoid, minimise or manage potential environmental and social impacts. Star of the South has committed to the mitigation, monitoring and contingency measures recommended by technical specialists to achieve acceptable environmental outcomes for works in Victoria.

26.7.1 Consultation

Some of the mitigation measures require consultation to inform the development of plans and measures to manage and mitigate impacts.

Star of the South will prepare an overarching Communications and Stakeholder Engagement Plan (see Section 26.5) to guide engagement throughout the phases of the works in Victoria. Where required, engagement subplans will be developed by contractors for activities relevant to their scope of work.

Consultation is included in mitigation measures where the views, requirements and priorities of identified stakeholders will help to develop the approach to implementing mitigation measures. Consultation will be tailored to the stakeholder and topic and may be in the form of meetings, workshops, or written correspondence. Not all consultation requires the provision of written material to seek written comments unless it is a requirement of statutory approvals.

Star of the South and its contractors will undertake all reasonable endeavours to engage with stakeholders and address all feedback provided. Where feedback cannot be taken on board, Star of the South and/or its contractor/s will communicate this to the stakeholder and document the outcomes.

26.7.2 Recommended mitigation measures

Mitigation measures outlined in this Victorian EMF cover activities that are proposed onshore, for the shore crossing and offshore out to 3 nautical miles. Mitigation measures may be implemented in stages and at different locations as works in Victoria is developed and delivered.

Contractors will develop the approach to implement the mitigation measures. The approaches will consider the current state of knowledge about impact mitigation for constructing underground cables and shore crossing, and apply feasible and practical methods to meet the design requirements and local conditions.

Some mitigation measures refer to a plan or measures being developed in accordance with guidelines or regulations. This refers to the version of the guidelines and regulations referenced at the time of preparing the impact assessment. At the time of implementing a mitigation measure, the latest documents will be referred to.

A consolidated list of mitigation measures recommended by technical specialists for works in Victoria is provided below.

Table 26-47 Project mitigation measures for the Victorian jurisdiction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Onshore ecology					
FFM-M001	Avoidance of impacts to ecological values during the design phase	Avoid or minimise impacts to sensitive ecological values.	Avoidance of impacts during design • Seek opportunities to avoid and minimise impacts on ecological values during further design and construction planning, including exploring whether trenchless design is possible and reasonably practicable in high value areas. • Prioritise avoidance and minimisation in areas such as Lyons Road, Woodside H28 Bushland Reserve, waterways and hollow bearing trees to minimise impacts to high quality native vegetation and threatened fauna habitat and minimise habitat fragmentation. Additional surveys to inform design and update ecological value information • Confirm the adequacy of ecological survey information, and carry out further surveys where required, to inform design and construction planning. This will include undertaking on-ground ecology surveys in areas previously inaccessible. Surveys will include Vegetation Quality Assessments (VQA), mapping of native vegetation (including threatened ecological communities, if present), identification of threatened flora and fauna habitat, and targeted survey for threatened flora and fauna if relevant (or assume presence in suitable habitat for mobile species and species with a limited seasonal survey period). Targeted surveys (or assumed presence) for threatened species should include, consideration of Glossy Grass Skink, Swamp Skink, Martin's Toadlet and Southern Toadlet if habitat for these species is proposed to be impacted. • Identify tree notional root zones of all native trees to be retained in accordance with the Assessor's Handbook (DEECA 2025)	Updated Environmental Line List.	Prior to construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Update mapping to include the outcomes of pre-construction surveys, no go zones, notional root zones, updated construction footprint and tree protection zones. • Verify site condition scores by a DEECA accredited assessor when VQA data is more than three years old for grassy, heathland, shrubland ecosystems and five years for woodland and forest ecosystems. • Update calculation of native vegetation impacts and offset requirements if required. • Updates to the design and ecology values and impacts will be provided to the Department of Energy, Environment and Climate Action. • Update Environmental Line List (FFM-M002) to reflect any changes to ecological values that occur within the project area, particularly in areas previously inaccessible. • Update Flora and Fauna Management Plan (FFM-M005) to reflect any changes to No-Go Zones and identification of threatened species (including assumed presence) and associated habitat. The above will be undertaken in consultation with DEECA. Where available and practicable, compliant third-party offsets shall be prioritised to be sourced from within Wellington Shire Council local government area.		
FFM-M002	Prepare an Environmental Line List (ELL)	Minimise or manage impacts to sensitive ecological values.	Prepare an Environmental Line List (ELL) which identifies all ecological values that occur within the project area (based on ecological values identified in accordance with FFM-M001) prior to construction commencing. The ELL will define all prescribed mitigation or management requirements associated with each identified value. The ELL will be incorporated in the detailed environmental management plans and will be referred to when completing detailed construction planning The ELL will be prepared in consultation with the Department of Energy, Environment and Climate Action and reviewed on a regular basis.	Development of an Environmental Line List.	Prior to construction (prepare ELL) Construction (implement ELL) Operation (implement ELL) Decommissioning (implement ELL)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M003	Prepare and implement a Construction Environmental Management Plan (CEMP) and subplans	Manage impacts of construction activities on ecological values.	Prepare and implement a Construction Environmental Management Plan (CEMP) to define measures to manage biodiversity values, air quality, noise, site contamination, waste, water quality and monitoring to minimise construction activities impacting on the environment in consultation with the Department of Energy, Environment and Climate Action and West Gippsland Catchment Management Authority with respect to surface water measures. An audit framework and emergency response procedure will be included in the plan. Specific controls for protecting ecological values not defined by the CEMP will be outlined in sub-plans to the CEMP including: • Flora and Fauna Management Plan (FFM-M005, FFM-M006) to define measures to protect retained ecological values during construction and outline control measures to minimise risk of disturbance, injury or death of fauna. • Biosecurity Management Plan (FFM-M007) to define measures to manage and control biosecurity threats (weeds, pathogens, and pest animals). • Management plans to reduce erosion, sedimentation and contamination risk to retained vegetation and habitat including waterways (FFM-M008). • Protocol for works within Conservation Reserves (FFM-M009). • Protocol for incidental discovery of threatened flora and fauna species. • Designated Waterway Crossing Management Plan (FFM-M010) to describe how the project will manage and control impacts on designated waterways during construction. • Rehabilitation and Reinstatement Plan (FFM-M013) to guide the approach to rehabilitation following the completion of construction in conservation reserves and roadsides / waterways that support remnant vegetation.	Development of a Construction Environmental Management Plan.	Prior to construction (prepare) Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M004	Contractor inductions and awareness	Manage impacts of construction activities on ecological values through Contractor awareness.	Provide inductions and training to ensure contractors are aware of areas of ecological value along the alignment and the mitigation measures required for construction activities. Provide reference material such as environmental management plans and maps at the site office during construction.	Project Induction records.	Prior to construction (prepare) Construction Operation Decommissioning
FFM-M005	Prevent construction impacting on retained vegetation and habitat not approved for removal	Manage impacts of construction activities on ecological values.	Prepare and implement a Flora and Fauna Management Plan (FFMP) to identify significant ecological values to be retained (native vegetation and threatened species habitat, Large Trees in Patches, Scattered Trees) including in areas previously inaccessible and define measures to protect those values during construction. The FFMP will be developed in consultation with the Department of Energy, Environment and Climate Action and will include: • No-Go Zones where works are not permitted to protect sites of known significant ecological values to be retained. No Go Zones to be placed on boundary of project area and around scattered trees, large patch trees and habitat trees where project area encroaches > 10% of Notional Root Zones (NRZ) as per AS 4970-2025 Protection of Trees on Development Sites. • Clear demarcation of No-Go Zones and NRZs on maps and construction drawings. • Protection of No-Go Zones and NRZs with temporary fencing and signage; fencing will be installed and removed in a staged manner as construction progresses along the linear alignment. • Pre-construction inspections by a Site Environmental Manager (or similar) to confirm that native vegetation and trees to be retained have been adequately protected from impact. • Conduct regular inspection and maintenance of fencing during construction to ensure continued integrity. • Performance targets and contingency measures.	Development of a Construction Environmental Management Plan including the sub plan - Flora and Fauna Management Plan.	Prior to construction (prepare) Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M006	Minimise disturbance, injury, or death of wildlife	Minimise the likelihood of impacts from construction activities to terrestrial fauna.	• Prepare and implement a Flora and Fauna Management Plan (FFMP) which outlines control measures to minimise risk of disturbance, injury or death of fauna. The FFMP will be developed in consultation with the Department of Energy, Environment and Climate Action and include measures to: • Manage any open pits or trenches to reduce potential for fauna entrapment in accordance with the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA, 2022) through measures such as: - Minimising the length of trench open at a time. - Minimising the amount of time trenches and other excavations are open. - Scheduling trenching through watercourses during dry or low flow periods. - Constructing trench plugs (short section of trench left unexcavated to allow passage of stock or wildlife across the trench) with slopes less than 45o to provide exit ramps for fauna. Provide other exit ramps where practicable and safe to do so. Exit ramps to be installed at the ends of cable trenches. - Creating 'ladders' to enable fauna to exit the excavations (e.g. branches, ropes, planks, floats). - Daily inspections of open trenches by appropriately certified personnel to remove trapped fauna as required. - Inspection prior to and during dewatering activities by appropriately experienced and licenced personnel to remove trapped aquatic fauna as required. - Checking for fauna prior to backfilling trenches. • Ensure fauna are discouraged from work areas by erecting barriers where practicable.	Development of a Construction Environmental Management Plan including the sub plan - Flora and Fauna Management Plan.	Prior to construction (prepare) Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Install signage along access routes through conservation reserves and patches of native vegetation to raise awareness of presence of wildlife crossing roads and reduce incidence of wildlife collision. • Design construction fencing, trenching and other construction elements to allow Koalas to exit the construction area (should they enter it). • Develop and implement a procedure for finding trapped and/or injured fauna. • Design any fencing required to define construction boundaries or to protect No-Go Zones or Notional Root Zones (NRZ) in accordance with relevant DEECA guidelines to limit fauna strike and fauna mortality risk and/or maintain habitat connectivity. • Schedule construction works to avoid the breeding season of threatened fauna species in areas of habitat for those species, where practicable. • Time removal of vegetation (trees, shrubs, ground cover) to avoid the breeding season of nesting birds and mammals or times when arboreal mammals are less active and more likely to be inhabiting hollows (winter and spring) where practicable. • Design and manage lighting to avoid/minimise light spill into adjacent habitat in general accordance with guidance in the National Light Pollution Guidelines for Wildlife (DCCEEW, 2023) where these do not conflict with construction safety. At the shore crossing, lighting that is considered lower-impact to terrestrial mammals (and if possible, migratory shorebirds) is to be prioritised. • Minimise night-time works where practical to do so, to reduce impacts of noise and light on nocturnal animals. Develop an artificial hollow program in consultation with the Department of Energy, Environment and Climate Action. The hollow program should document the actual losses, specify a suitable replacement ratio and artificial hollow types, record the number and location of artificial hollows and provide auditing the program.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Avoid impacts on Hooded Plover by engaging a suitably trained ecologist to check the beach for signs of nesting habitat for Hooded Plover and, if nests are found, designating no go areas and installing signage (OFF-M05). • Conduct pre-clearing survey at all sites where vegetation or aquatic habitat is being removed to assess presence of fauna. While this is particularly relevant for the removal of hollow-bearing trees due to potential occupancy of hollows, it is also relevant for shrubs and ground layer habitat as this provides nesting and refuge opportunities for non-hollow dependent fauna. Where practicable, translocate any fauna detected during the survey, prior to the removal of any vegetation within the surveyed area. • Engage a suitably qualified wildlife handler ('wildlife spotter'), holding a relevant and current authorisation under the *Wildlife Act 1975*, to salvage any wildlife encountered during site clearance works. • Management protocols for any threatened fauna species detected during pre-construction surveys (in accordance with FFM-M001) or during construction, with specifies specific mitigations for, without limitation, Glossy Grass Skink and Swamp Skink if habitat for these species exists within the project area. • Management protocols to reduce disturbance risk (such as works buffer distances during nesting / breeding periods) to Orange- bellied Parrots, White-bellied Sea-eagle, and Little Eagle ~~during the construction phase of the project~~. • Identify zones to reduce speed limits in areas of extensive Koala habitat, such as in conservation reserves and access routes, where dense vegetation is adjacent to roads.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M007	Control spread and/or introduction of weeds, pathogens and/or pest animals	Manage biosecurity risks and minimise the likelihood of introduction and spread of weeds, pathogens and/or pest animals.	Prepare and implement a Biosecurity Management Plan (BMP) to define measures to manage and control impacts on indigenous fauna and flora values from biosecurity threats (weeds, pathogens, and pest animals) and set performance targets and contingency measures. The BMP will be developed in consultation with the Department of Energy, Environment and Climate Action and Wellington Shire Council and define measures to prevent the introduction and spread of weeds and pathogens including: • Use of fill that is preferably sourced locally to be compatible with the surrounding area or, if from offsite, needs to be determined as weed-free by a suitable service provider as per the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA 2017). • Inspection and certification of machinery and materials upon arrival at site in accordance with A Guide for Machinery Hygiene for Civil Construction (CCF 2011) • Biosecurity hygiene protocols to mitigate the spread of weeds, Cinnamon Fungus and Chytrid Fungus. • Risk assessment of the potential to spread/facilitate dispersal of pest plants/animals/pathogens during construction and operation. • Pre-construction weed and pest mapping to determine locations of Catchment and Land Protection Act 1994 listed weeds and pests where weed and pest treatment is required within the project land. • Monitoring during construction to identify any new outbreaks of weeds. • Management of any outbreak weeds within construction areas that occurs due to construction activity in accordance with the Catchment and Land Protection Act 1994. • Measures to minimise the risk of spread of weeds into adjacent land. • Measures to ensure pest animals are not encouraged in the area through the provision of food (e.g. garbage on-site), harbour or new burrowing opportunities (e.g. for rabbits, foxes).	Development of a Construction Environmental Management Plan including the sub plan - Biosecurity Management Plan.	Prior to construction (prepare) Construction Operation Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Measures to minimise the risk of spreading weeds and/or pathogens elsewhere in the region from machinery and vehicles leaving the project area. • Measures to minimise the risk posed by H5 avian influenza, including by implementing any applicable response measures specified by the Department of Agriculture, Fisheries and Forestry (Cth) or the Department of Energy, Environment and Climate Change (Vic) as at the time that construction is undertaken.		
FFM-M008	Reduce erosion, sedimentation and contamination risk to retained vegetation and habitat (including waterways)	Minimise and manage impacts on retained vegetation and habitat and aquatic environments from erosion and sedimentation.	The CEMP (FFM-M003) must identify and define control measures to minimise impacts of erosion and acceleration of stream processes to protect bank stability, habitat and aquatic environments of waterways and drainage channels that could be directly or indirectly affected by construction activities. Erosion and sediment will be managed in accordance with current best practice environmental management and the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA, 2017) to prevent sediment-laden water from entering retained vegetation and habitat, drainage systems and waterways (see also, SOL-M010). Prepare and implement measures and procedures to manage air quality such as management of stockpiles and materials which may become windborne (i.e. covering, spraying) in areas adjacent to retained vegetation and waterways (see also, AQM-M001). Prepare and implement measures and procedures to manage hazardous substances under the CEMP which define measures for storage and handling of hazardous substances in areas adjacent to retained vegetation and waterways (see also, SUM-M003).	Development of a Construction Environmental Management Plan including the sub plan - Soil Erosion and Sediment Management Plan.	Prior to construction (prepare) During construction (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M009	Protect values within conservation reserves	Avoiding or minimise impacts to sensitive ecological values within Conservations Reserves.	Prepare and implement a protocol for works within Conservation Reserves in consultation with Parks Victoria and the Department of Energy, Environment and Climate Action. Measures contained within the protocol will be based on those defined in the Flora and Fauna Management Plan (FFM-M005) and Biosecurity Management Plan (FFM-M007) components of the Construction and Operational Environmental management Plans but with site-specific requirements, where required.	Development of Construction Environmental Management Plan.	Prior to construction (prepare) During construction (implement)
FFM-M010	Manage impacts on waterways	Manage and minimise impacts to waterways from waterway crossing construction.	Prepare and implement a Designated Waterway Crossing Management Plan (DWCMP) in consultation with the Department of Energy, Environment and Climate Action and the West Gippsland Catchment Management Authority to describe how the project will manage and control impacts on designated waterways during construction. The DWCMP will define the construction method, timing and duration for construction works, and outline mitigations appropriate to the waterways such as diversion drains to maintain environmental water flows during construction. Designated Waterway Crossing Plan to be developed in alignment with the surface water elements of the project wide Construction Environmental Management Plan (FFM-M003), procedures to manage soil, erosion and sediment (FFM-M008), the Rehabilitation and Reinstatement Plan (FFM-M013), and measures to control the introduction and/or spread of weeds and/or pathogens (FFM-M007).	Development of a Construction Environmental Management Plan including the sub plan - Designated Waterway Crossing Management Plan.	Prior to construction (prepare) During construction (implement)
FFM-M011	Prepare and implement an Operation Environmental Management Plan (OEMP)	Manage impacts of operational activities on ecological values.	Prepare and implement an Operation Environmental Management Plan (OEMP) in consultation with the Department of Energy, Environment and Climate Action to define controls around the protection of retained biodiversity values including: • An Environmental Line List (ELL) which identifies ecological values that occur within the project area and prescribed management requirements associated within each identified value. The ELL will be reviewed on a regular basis. • Permitted maintenance activities (extent and type of activity) based on the ELL and defined based on the occurrence of native vegetation, threatened ecological communities and threatened species habitat.	Development of Operation Environmental Management Plan.	Prior to operation (prepare) During operation (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Accurate maps identifying 'No Go Zones' and/or maintenance zones based on restrictions associated with ecological values. • Weed and pathogen control, in accordance with the same post-completion prevention and control procedures and methods outlined for the construction phase of the project. • Dust control using the same methods used during the construction phase for routine vehicle movements (cf. large construction machinery movements). • Waterway and wetland protection, including the use of stabilised waterway crossing points during dry conditions only, or the use of designated existing bridges to obtain access to the easement during wet conditions. • An audit framework will be included in the plan. • Corrective actions to be implemented if the outcomes of the OEMP are not achieved. The OEMP will be reviewed by the project annually and adaptive measures implemented (where required).		
FFM-M012	Prepare and implement a Decommissioning Environmental Management Plan (DEMP).	Manage impacts of Decommissioning activities on ecological values.	Prepare and implement a Decommissioning Environmental Management Plan (DEMP). The DEMP will be developed following an updated survey of biodiversity values present immediately prior to the decommissioning phase. An audit framework will be included in the plan. The DEMP will be developed in consultation with the Department of Energy, Environment and Climate Action and reviewed by the project annually.	Development of Decommissioning Environmental Plan.	Prior to decommissioning (prepare) During decommissioning (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M013	Site reinstatement and rehabilitation	Manage and mitigate impacts of construction activities on ecological values through rehabilitation and reinstatement.	Prepare and implement a Rehabilitation and Reinstatement Plan (RRP) to guide the approach to rehabilitation following the completion of construction in patches of native vegetation and threatened species habitat in conservation reserves and on waterways, private land and roadsides. The RRP will be developed in consultation with the Department of Energy, Environment and Climate Action, West Gippsland Catchment Management Authority, relevant landowners/land managers (including Wellington Shire Council), and with reference to the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (APGA, 2017), and include measures such as: • Documenting the pre-construction condition of all waterways and drainage lines potentially affected by construction (including their immediate surrounds) to establish baseline conditions and inform development of measures to manage potential impacts • Details of the actions and responsibilities to progressively rehabilitate, regenerate, revegetate and/or re-instate areas, including beds and banks of waterways and drainage lines (noting the operational maintenance requirements). • Topsoil removal and storage to protect the seed bank resource. • Retention of proportion of trees felled in situ to provide additional habitat resources. Emphasis should be placed on retaining trees that contain hollows. • Returning habitat features removed during construction such as large hollow logs and rocks if consistent with rehabilitation objectives at particular locations. • Rehabilitation of Woodside H28 Bushland Reserve as soon as reasonably practicable (if required) • Identification of flora species and plant and/or seed stock sources that may include salvage and replanting of plants where appropriate and reasonably practicable. • Procedures, timeframes, measurable performance objectives, and responsibilities for monitoring the success of rehabilitation and/or reinstatement/stabilisation areas (including frequency of monitoring considering high risk weed life cycles).	Development of a Construction Environmental Management Plan including the sub plan - Rehabilitation and Reinstatement Plan.	Prior to construction (prepare) Post construction (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Corrective actions to be implemented if the outcomes of rehabilitation and/or reinstatement/stabilisation do not achieve the objectives adopted. • In consultation with DEECA, develop appropriate compensation measures for direct loss of Pale Swamp Everlasting and Coast Grey-box.		
FFM-M014	Prepare and implement a Dewatering Plan	Minimise impacts on Groundwater Dependant Ecosystems during construction.	Following detailed design and prior to construction, prepare a Dewatering Plan as a sub-plan to the Construction Environmental Management Plan (CEMP) to outline whether potential Groundwater Dependent Ecosystems (GDEs) may be affected and measures to monitor and manage impacts of dewatering associated with transition joint bays at shore crossing and joint bays and cable trench(es) along the onshore transmission line will be managed as follows: • Confirm potentially affected GDEs – confirm presence of existing native vegetation and waterways within the area that may be influenced by groundwater drawdown. • Drawdown assessment (terrestrial GDEs) – assess potential for adverse dewatering impacts on the native vegetation in that area based on potential for water table to be intersected and likely reliance on groundwater of the vegetation community. • Drawdown assessment (aquatic GDEs) in shore crossing area – assess potential impact to the unnamed waterway from transition bay dewatering, including undertaking additional groundwater and surface water level and water quality monitoring. • Drawdown assessment (aquatic GDEs) near joint bays – site-specific impact assessment in the event that a joint bay is located within 60 m of Morris Creek, Warrigal Creek, Hoddinott Creek, or Sunville Creek. • Manage construction – time dewatering to avoid driest periods • Make good arrangements – irrigation of GDEs where excavation intersects groundwater and dewatering if regular monitoring around those potential GDEs identifies this is required.	Development of a Construction Environmental Management Plan including the sub plan - Dewatering Plan.	Prior to construction (prepare) Construction (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
FFM-M015	Targeted survey for protected flora on public land	Confirm species and number of individuals impacted and minimise and manage impacts of construction activities on protected flora	Undertake targeted surveys for threatened and protected flora on public land to inform application for Flora and Fauna Guarantee Act permit to take. Engage with the Department of Environment, Energy and Climate Action on expectations on additional information required to be obtained prior to submission of application for a FFG Permit.	Engagement with DEECA; Application for FFG Act permit; Permit approved to take protected flora from public land.	Prior to construction
Groundwater					
GWM-M001	Assessment and make good arrangements to manage temporary water level drawdown at water supply well(s)	Manage the impact of construction on existing water supply wells.	Following detailed design and prior to construction, the potential for temporary water level drawdown at existing water supply well(s) due to dewatering will be managed as follows: 1 Confirm existing wells The location, construction details, and intended uses of wells on land adjacent to the easement will be confirmed through liaison with appropriate landowners. This will include wells that may be present in the study area but are not in the registered well database. 2 Drawdown assessment An assessment of the potential for adverse dewatering impacts on water supply wells will be completed based on the well's distance from dewatering activities with consideration to drawdown estimates contained herein, well construction and available drawdown (difference between standing water level and pump depth). 3 Make good arrangements If the potential for an impact is identified, then make good arrangements between the proponent and landholder/well owner will be agreed and implemented during temporary dewatering activities (if required).	Development of a drawdown assessment based on detailed design and records of make good arrangements (if required), as required in CEMP.	Construction
GWM-M002	Replacement of lost or damaged well(s)	Manage the impact of construction on existing wells.	Following detailed design and prior to construction, the potential for existing wells to be lost or damaged will be managed as follows:	Development of make good arrangements (if required), as required in CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			41 Confirm existing wells The location, construction details, and intended uses of wells within the construction corridor will be confirmed through liaison with appropriate landowners. 52 Make good arrangements In instances where a well is deemed to be impacted by the project, make good arrangements between the proponent and landholder/well owner will be agreed and implemented (subject to any approvals required).		
GWM-M003	Preventing impacts to groundwater quality from excavation and dewatering of acid sulfate soils	Minimise and manage the impacts of acid sulfate soil mobilisation on groundwater.	An Acid Sulfate Soil Management Plan will be prepared and implemented for the project (refer to SOL-M005 and SUM-M006. For the purposes of groundwater impacts, the Acid Sulfate Soil Management Plan will be prepared and implemented in accordance with the National Acid Sulfate Soils Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments (Shand et al., 2018). The Acid Sulfate Soil Management Plan will include, but not be limited to, the following actions in areas confirmed to contain potential acid sulfate soil: • Staging of disturbance and dewatering to limit the groundwater cone of depression to less than 100 metres from the edge of excavations; • Installation of groundwater monitoring bores upgradient and downgradient of dewatering and monitoring of groundwater quality pre-dewatering (that is, baseline monitoring), during dewatering, and post-dewatering; • Monitoring of drawdown levels and dewatering discharge quality during construction dewatering; • Contingency measures that include immediate cessation of dewatering if the groundwater quality results indicate that environmental impact has occurred as a result of project works	Development of an Acid Sulfate Soil Management Plan	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Surface water					
SUM-M001	Managing flood risk at construction sites	Avoid and minimise impacts of stormwater and flood risks during construction	Locate construction compounds, drilling compounds, batching plants, laydown areas and material storage areas outside of the 1% Annual Exceedance Probability (AEP) flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: • Site optimisation during the detailed design phase to minimise works in the floodplain. This will include locating soil stockpiles, equipment laydown areas and all non-essential plant and equipment outside of the floodplain. • The Construction Environmental Management Plan (CEMP) will include a surface water management plan (SWMP) that sets out the engineering controls and management strategies required to manage stormwater and flood risks within the construction site and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020). The plan will include, but not be limited to the following: - Elevating temporary buildings and containerised equipment above the 1% AEP flood level wherever practical. - Minimising soil disturbance within the floodplain. - Bunding to reduce the risk of inundation from a 1% AEP flood event or storm tide. This will be designed to maintain conveyance of floodwater around the bunded area. - A staged response to potential flood and storm events.	Inclusion of engineering controls and management strategies required to manage stormwater and flood risks in the CEMP (surface water management plan)	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SUM-M002	Managing changes to flow regime	Management of surface water flow regimes during construction.	Locate construction compounds, drilling compounds, batching plants, laydown areas and material storage areas outside of the 1% AEP flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: The Construction Environmental Management Plan (CEMP) will be developed in consultation with the relevant authorities. The CEMP will include a surface water management plan (SWMP) that sets out the engineering controls and management strategies required to maintain the exiting flow regime regime and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020): - Set backs of works and associated construction facilities from designated waterways and drainage pathways - Crossings of designated waterways and drainage pathways will be designed to meet the requirements of the West Gippsland Catchment Management Authority (WGCMA).	Inclusion of engineering controls and management strategies required to manage stormwater and flood risks in the CEMP (surface water management plan).	Construction
SUM-M003	Preventing fuel and chemical spills	Management of fuels and chemicals during construction.	The CEMP through the surface water management plan will be implemented and include measures and procedures for the appropriate storage, handling and transportation of chemicals and fuels, including: • Store bulk fuel in self-bunded tanks in accordance with relevant Australian standards (AS1940-2017 and AS1692-2006). • Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 m or as far away as is reasonably practical from any waterway with appropriate measures to contain spills. • Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety Act 2004 (OHS Act) and Occupational Health and Safety Regulations 2007 (OHS Regulations).	Inclusion of measures and procedures for the appropriate storage, handling and transportation of chemicals and fuels in the CEMP (surface water management plan).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods. • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur Supply spill kits and firefighting equipment with the chemicals required by legislation. Maintain dangerous goods and hazardous materials register and current safety data sheets (SDSs). • Transformers to be filled only following installation of bunds to prevent discharge of oils during filling process.		
SUM-M004	Preventing pollution from trenched waterway crossings	Avoid and minimise pollution impacts from trenched waterway crossing construction.	All trench crossing works will be carried out in accordance with relevant regulatory requirements and industry best practice guidelines including: • International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control Appendix P; Land Based Pipeline Construction Guidelines (2015). • EPA Publication 1896: Working within or adjacent to waterways (2020). • The conditions of any WGCMA Works on Waterways Permit. • The WGCMA will be consulted for all waterway crossing works. • Trench crossing works will be programmed for dry or low flow conditions, where practicable. • The trenched waterway crossing excavation staging strategy will include staging the program to minimise the length of time excavations remain open, to the extent practicable. • Alternative construction methodologies, such as trenchless crossings (e.g. HDD) will be considered for waterways with significant baseflows, deep or steep sided gullies, or where bank stabilisation and rehabilitation works are not feasible. • Refer also to Designated Waterway Crossing Management Plan (FFM-M010) for waterway crossing requirements.	Development of a trenched waterway crossing excavation staging strategy - part of CEMP and construction method statement.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SUM-M005	Preventing pollution from trenchless waterway crossings	Avoid, minimise manage pollution impacts from trenched waterway crossing construction.	The proposed drilling profile design and the work method statement shall be submitted to the WGCMA and approved prior to the commencement of trenchless waterway crossings. Risk of frac-out will be assessed in accordance with industry best practice guidelines to determine likelihood of occurrence (e.g. modelling). Drilling profiles will be adjusted where the risk of frac-out is considered likely. Drilling fluid properties will be monitored during trenchless crossing operations to reduce the risk of frac-outs (e.g. mud weight, viscosity, pressure). Drilling equipment and configuration will be appropriate for the proposed trenchless crossing operation to prevent frac-out. Pollution prevention strategies will be in accordance with EPA Publication 1834; Civil Construction, Building and Demolition Guide, IECA Best Practice Erosion and Sediment Control Appendix P; Land Based Pipeline Construction Guidelines and EPA Publication 1896: Working within or adjacent to waterways. Sediment control devices such as silt fences will be used to remove suspended solids and dissipate flow where required. Earth bunds/or and drainage channels will be placed around the upper edges of drill sites and work areas to divert natural runoff around and away from the site and prevent mixing with drilling compound runoff. Sump pits will be constructed at the bottom of the drill site. The sump pit will be positioned to capture runoff from the drilling compound. Materials collected in the sump pit will be assessed and managed in accordance with industry best practice guidelines for trenchless crossing operations. An earth bund or silt fence will be placed around the sump pit to contain any spillage. All facilities utilised in the surface mud handling (mixing, cleaning and pumping) during trenchless crossing activities will be bunded.	Submission of proposed drilling profile design and work method statement to WGCMA.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SUM-M006	Managing acid sulfate soils during construction	Manage impacts associated with the disturbance of acid sulfate soils during construction.	All works in areas identified as containing potential ASS, an ASS management plan will be developed (also refer to mitigation GWM-M003) and all mitigation works will be carried in out in accordance with the relevant industry legislation and guidelines, including: • Industrial Waste Management Policy (Waste Acid Sulfate Soils) 1999. • EPA Victoria - Publication IWRG655.1 Acid Sulfate Soil and Rock. • Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils (CASS BPMG 2010). • Construction works will be staged and programmed to minimise the duration and exposure of excavations in areas identified as containing ASS to the extent practicable.	Development of an Acid Sulfate Soil Management Plan.	Construction
SUM-M007	Managing runoff from construction sites	Management of erosion and sediment and site runoff during construction.	All construction activities will be carried out in accordance with industry standard best practice guidelines including: • IECA Best Practice Erosion and Sediment Control Guidelines. • EPA Publication 1834; Civil Construction, Building and Demolition Guide. • EPA Victoria Publication 1806; Reducing Risk in the Premixed Concrete Industry. • A project wide Construction Environmental Management Plan (CEMP) will include a surface water management plan (SWMP) that sets out the engineering controls and management strategies required to manage runoff during construction. The CEMP will also include requirements for appropriate soil testing at each site to identify any potentially problematic soils (e.g. dispersive soils). Where identified, the CEMP will outline the necessary control measures to ensure problematic soils are managed to prevent runoff from impacting receiving waterways and wetlands.	Inclusion of erosion and sediment mitigation measures in the CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SUM-M008	Preventing discharges from dewatering activities	Avoid and minimise impacts to surface water quality from dewatering discharge.	The CEMP through the surface water management plan will adopt a management hierarchy that prioritises the prevention of discharges into surface waters as far as is reasonably practicable. Any groundwater released to surface waters will meet the water quality objectives as defined in the Environmental Reference Standards 2021.	Inclusion a management hierarchy that prioritises the prevention of discharges into surface waters in the CEMP (surface water management plan).	Construction
SUM-M009	Managing climate change impacts	Management of impacts of climate change for onshore infrastructure during operations.	Design of the onshore operational facilities will make allowances for the impacts of climate change on surface water, including risk of inundation.	Design basis document.	Operation
SUM-M010	Preventing changes to flow regime from permanent infrastructure	Avoid and minimise flood risk and hydrological impacts to infrastructure, waterways, and surrounding land during operations.	Locate all operational and permanent infrastructure, including joint bays, outside of the 1% AEP flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: • Permanent infrastructure will be designed to address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020) • Site optimisation during the detailed design phase to ensure all permanent infrastructure is set back from designated waterways and drainage pathways. • Design of waterway crossings of designated waterways and drainage pathways to meet the requirements of the WGCMA. • Diversion of minor drainage pathways around structures to the satisfaction of the WGCMA.	Design basis document.	Operation

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Reinstatement of trenches and excavations to ensure existing surface topography and grades are maintained. This includes monitoring of backfilled excavations and remedial corrective works as required.		
SUM-M011	Managing flood risk at decommissioning sites	Avoid, minimise manage flood risk and potential water quality impacts during decommissioning.	Decommissioning infrastructure including site compounds, laydown areas, wastes and materials storage areas will be located outside of the 1% AEP flood extent (2060), floodplains and areas identified as land subject to inundation overlay or floodway overlay to the extent practicable. Where relocation of works outside of the floodplain is not considered feasible, a Surface Water Management Plan will be developed to set out the engineering controls and management strategies required to manage flood risks within the decommissioning site and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020).	Surface Water Management Plan - part of Decommissioning Plan.	Decommissioning
SUM-M012	Managing runoff from decommissioning sites	Avoid, minimise and manage impacts on surface water quality during decommissioning.	All decommissioning activities will be carried out in accordance with the relevant industry standard best practice guidelines at the time of decommissioning. At the minimum, these will include guidelines that relate to best practice: • Erosion and sediment controls • Environmental guidelines for major construction sites • Storage and handling of fuels, chemicals, and wastes • A site-specific Surface Water Management Plan will also be developed, setting out the engineering controls and management strategies required to manage stormwater runoff and water quality impacts.	Surface Water Management Plan - part of Decommissioning Plan.	Decommissioning
SUM-M013	Managing acid sulfate soils	Manage impacts associated with the disturbance of acid sulfate soils during decommissioning.	The management of ASS during the decommissioning phase will be carried out in accordance with the relevant legislation and best practice guidelines at the time of decommissioning. All decommissioning works will be staged and programmed to minimise the duration and exposure of excavations in areas identified as containing ASS to the extent practicable.	Decommissioning plan.	Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SUM-M014	Preventing fuel and chemical spills	Management of storage and handling of chemicals, fuels, oils and wastes during decommissioning.	The storage and handling of chemicals, fuels, oils and wastes will be carried out in accordance with the relevant industry standard best practice guidelines at the time of decommissioning.	Decommissioning plan.	Decommissioning
Soil and waste					
SOL-M001	Management of dewatering discharge	Avoid and minimise impacts of dewatered groundwater to soil and surface water quality during construction.	Dewatered groundwater from the onshore transmission construction will only be discharged to land in accordance with the Environment Protection (EP) Regulations (subject to agreement of landowners). Groundwater will be tested to confirm suitability for discharge with regard to pH and salinity (this may be completed using handheld monitoring equipment in the field). Groundwater must not be discharged to ground where it may flow into a surface water body unless in accordance with the EP Act and Regulations and with approval from the Authority.	Groundwater testing records and obtaining EPA approval (if required), as required by CEMP and Dewatering Plan.	Construction
SOL-M002	Management of unexpected contamination	Avoid and minimise impacts from unexpected or unknown contamination to soil and surface water quality, and human health during construction.	In the event that unexpected or unknown contamination is encountered during construction works, the Construction Environment Management Plan (CEMP) will be implemented and will include the following measures to mitigate risks to human health and the environment: • Ground disturbance activities will be suspended at the area of unexpected or unknown contamination and within the immediate vicinity • Assessment of the contamination will be undertaken by a suitably qualified specialist, and the appropriate action(s) determined Appropriate action(s) will be implemented.	Development of a Construction Environmental Management Plan including management of unexpected contamination Stop works record and contamination assessment (if required).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SOL-M003	Soil excavation staging	Manage impacts associated with the soil excavation, including disturbance of acid sulfate soils during construction.	A soil excavation staging strategy will be implemented for all soils from the onshore transmission construction The soil excavation staging strategy will include: • Staging of disturbance such that the potential effects on any area disturbed at any one time can be effectively managed • Staging of excavations program to minimise the amount of time that identified Acid Sulfate Soil (ASS) is exposed to the atmosphere (including rainfall and seeping perched waters (if any). • Suggested stockpiling durations as per the Coastal Acid Sulfate Soil (CASS) Best Practice Management Plan (BPMG), where ASS is identified • Measures to be implemented if stockpiles are to remain for longer than the suggested durations, for instance: - chemical treatment (liming) - spreading a guard layer before stockpiling - covering the stockpile.	Development of a soil excavation strategy, likely reflected in Contractor's construction method statement.	Construction
SOL-M004	Assessment of Acid Sulfate Soil	Manage impacts associated with the disturbance of acid sulfate soils during construction.	Further Acid Sulfate Soil (ASS) assessment of soils, identified as Actual ASS or Potential ASS, in accordance with National Acid Sulfate Soils Guidance is required to characterise the extent of ASS and identify required management levels (such as liming). The assessment of ASS is required to feed into development of the Acid Sulfate Soil Management Plan (ASSMP) (SOL-M005).	Development and implementation of an Acid Sulfate Soils Management Plan.	Construction
SOL-M005	Management of Acid Sulfate Soil	Manage impacts associated with the disturbance of acid sulfate soils during construction.	An Acid Sulfate Soils Management Plan (ASSMP) will be developed and implemented for all Acid Sulfate Soil (ASS) from the onshore transmission construction (refer also to GWM-M003 and SUM-M006). The monitoring program must be in place prior to any construction commencing. The ASSMP will detail the requirements for management of ASS for the project including: • Construction works in areas of ASS will not occur during wet months unless unavoidable • Managing unexpected interception of ASS	Development and implementation of an Acid Sulfate Soils Management Plan.	Prior to construction (prepare plan) Construction (implement) ~~Construction~~

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Appropriate capture and management of runoff including details regarding potential requirements for containment within bunds and a leachate collection system (where necessary) • Appropriate trench dewatering that will limit Potential ASS activation in accordance with the Coastal Acid Sulfate Soil Best Practice Management Guideline (CASS BPMG) and the National Acid Sulfate Soils Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments • Appropriate offsite disposal if ASS cannot be managed onsite • Training to be provided to relevant site-based personnel on the requirements of the ASSMP • ASS management monitoring program to measure the effectiveness of the mitigation and management measures and to provide an early warning of any environmental degradation or impact to surface water, groundwater and soils. The ASSMP will be prepared in accordance with relevant guidelines and regulations, including: • Environment Protection (EP) Act • EP Regulations • Industrial Waste Management Policy (Waste Acid Sulfate Soils • EPA Victoria Publication 655: Acid Sulfate Soil and Rock • Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soil (CASS BPMG, 2010) • National Acid Sulfate Soil Guidance: Sampling and Identification Methods Manual • National acid Sulfate Soil Guidance: Identification and Laboratory Methods Manual • National acid Sulfate Soil Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments. • Australian Standards 4969 Analysis of Acid Sulfate Soil		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• The ASSMP will be reviewed and verified by an environmental auditor as complying with the relevant guidelines and legislation.		
SOL-M006	Trenchless construction practices	Avoid and minimise impacts to soil, groundwater and surface water quality during trenchless crossing construction.	An experienced and qualified trenchless construction contractor (e.g. horizonal direction drilling (HDD) contractor) will be employed to undertake any trenchless works and will employ practices to prevent losses of drilling fluids such as: • Detailed design including frac out modelling to identify the lowest risk drilling path and methods to reduce risk of loss to the environment • Monitoring circulation of drilling fluid throughout the operation for indication of loss of drilling fluids • Specify suitable use of non-toxic and biodegradable drilling fluid • Recycling of drilling fluids where practicable • Loss circulation material to be available onsite to address porous formation if encountered. • Drill cuttings and residual drilling fluids will be collected and contained. Wet cuttings and excess fluid will be transported to an EPA Victoria licensed waste facility in accordance with EPA Victoria Publication 1828.3 and Environment Protection Regulations 2021 as required • The measures and procedures adopted for trenchless construction activities, to minimise loss of fluid, must be detailed in the Construction Environment Management Plan (CEMP).	Inclusion of measures and procedures adopted for trenchless construction activities in the CEMP.	Construction
SOL-M007	Management of chemicals and fuels	Management of chemicals and fuels during construction.	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate storage, handling and transportation of chemicals and fuels in line with relevant EPA guidelines, such as Publication 1698 – Liquid Storage and Handling Guidelines, and Publication 1730 – Solid Storage and Handling Guidelines, including: • Store bulk fuel in self-bunded tanks in accordance with relevant Australian standards (AS1940-2017 and AS1692-2006) • Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 m from any waterway with appropriate measures to contain spills	Inclusion of measures and procedures adopted for the appropriate storage, handling and transportation of chemicals and fuels in the CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety (OHS) Act and OHS Regulations • Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur • Supply spill kits and firefighting equipment with the chemicals required by legislation • Maintain dangerous goods and hazardous materials register and current safety data sheets (SDS).		
SOL-M008	Management and disposal of spoil	Management and disposal of spoil during construction.	Develop and implement a plan for the disposal of large quantities of trench spoil, to be included in the Construction Environment Management Plan (CEMP), in consultation with Wellington Shire Council (as it relates to municipal waste disposal facilities). The disposal plan must include: • Identify offsite reuse options where appropriate and possible • Identify one or more locations able to accept the waste trench spoil where it will be managed to prevent impact to the surrounding environment at the time of placement and into the future • Identify disposal locations that may be beneficial to the community and/or environment (for instance, former quarry sites) • The potential risk associated with dispersive soil much be addressed where spoil is to be reused, including consideration of erosion and impact to adjacent agricultural land (based on guidance from the International Erosion Control Association - IECA, Best Practice Erosion and Sediment Control (2025)).	Inclusion of measures and procedures adopted for the disposal of large quantities of trench spoil in the CEMP (disposal plan).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			Any reuse or disposal must be in accordance with the Environment Protection (EP) Act, EP Regulations and EPA Victoria Publication 1828.3 Waste disposal categories – characteristics and thresholds.		
SOL-M009	Management of waste	Management of waste during construction.	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate handling, storage and disposal of waste streams, including: • Manage waste in accordance with Environment Protection (EP) Act, EP Regulations and other relevant EPA guidance documents, including Publication 1827.2 (Waste Classification Assessment Protocol), Publication 1828.3 (Waste Disposal Categories – Characteristics and Thresholds), IWRG702.2 (Soil Hazard Categorisation and Management), and PFAS NEMP 3.0, including establishment of appropriate and secured waste storage locations on-site, as required • Develop and implement waste management procedures • Waste will be managed in accordance with the waste management hierarchy, as outlined in the EP Act • Collect and transport wastes by licenced contractors for disposal at appropriately licenced facilities • Provide waste containers for different types of waste generated onsite • Refuse containers should be lidded or secured appropriately, for instance, putrescible waste should be lidded to mitigate fauna access, other waste should be lidded or secured appropriately if required to avoid dispersal.	Inclusion of measures and procedures adopted for appropriate handling, storage and disposal of waste streams in the CEMP.	Construction
SOL-M010	Trench backfilling approach	Management of trench backfill during construction.	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate management of trench backfill in accordance with the Code of Environmental Practice Onshore Pipelines Revision 5. Trenches to be backfilled and compacted to a specific geotechnical design method based on the type of material being placed. Once spoil has been compacted the topsoil will be reinstated.	Inclusion of measures and procedures adopted for the appropriate management of trench backfill in the CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SOL-M011	Operational management of fuels and chemicals	Management of fuels and chemicals during operations.	The Operational Environment Management Plan (OEMP) will be implemented and include measures and procedures for the appropriate handling and storage or fuels and chemicals, including: • Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 metres or as far away as is reasonably practical from any waterway with appropriate measures to contain spills. • Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety (OHS) Act and OHS Regulations. • Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods. • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur. • Maintain dangerous goods and hazardous materials register and current safety data sheets.	Inclusion of measures and procedures adopted the appropriate handling and storage or fuels and chemicals in the OEMP.	Operation
SOL-M012	Operational management of waste streams	Management of fuels and chemicals during operations.	The Operational Environment Management Plan (OEMP) will be implemented and include measures and procedures for the appropriate handling, storage and disposal of waste streams, including: • Minimisation via avoidance and recycling where practicable • Management and disposal of wastes in accordance with Environment Protection (EP) Act and EP Regulations, including disposal to licenced facilities where appropriate.	Inclusion of measures and procedures adopted for the appropriate handling, storage and disposal of waste streams in the OEMP.	Operation
Aboriginal cultural heritage					
ACH-M001	Cultural Heritage Management plan	Manage impacts to Cultural Heritage	Prepare, gain approval, and implement conditions of a CHMP in accordance with Aboriginal Heritage Act 2006 (Vic)	Approval of a project specific CHMP	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
ACH-M002	Cultural Values Assessments	Manage impacts to intangible, non-archaeological Cultural Heritage	Prepare a cultural values assessment in conjunction with Gunaikurnai Land and Waters Aboriginal Corporation to assess impacts to intangible, non-archaeological Aboriginal heritage places and/or values. Prepare a cultural values assessment in conjunction with Bunurong Land Council Aboriginal Corporation as relevant to the Project.	Preparation of ~~a~~ Cultural Values Assessments	Pre-Construction
ACH-M003	Onshore cable design	Avoid and minimise impacts to Cultural Heritage at Reeves Beach	The Reeves Beach onshore cable crossing will be designed and constructed in a way that minimises impact to any cultural heritage material upon, or within, the foreshore barrier dunes. Specifically, the buried cable will be installed via trenchless excavation techniques at a suitable depth (more than 10 m) to avoid any impact to Aboriginal cultural heritage material upon, or within the foreshore barrier dunes.	Use of directional drilling to construct the shore crossing infrastructure (more than 15m depth)	Construction
ACH-M005	Radiant heat	Avoid and minimise impacts of radiant heat on vegetation	The adopted project design with relation to buried cable installation will mitigate the probability that native vegetation will be affected by buried cable radiant heat during the operational phase of the project.	Inspection required in the CEMP and OEMP	Operation
ACH-M006	Traditional Owner Engagement Plan	Manage impacts to Traditional Owners with an interest in the project through effective communication and engagement.	A Traditional Owner Engagement Plan will be prepared in consultation with Traditional Owners, including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the project. The Traditional Owner Engagement Plan will provide a framework for ongoing engagement, communication, consideration of feedback and resolution of issues throughout the life of the project.	Development of a Traditional Owner Engagement Plan	Pre-construction Construction Operation Decommissioning
SCH-M001	Detailed geotechnical and geophysical surveys to inform an updated Submerged Palaeolandscape Assessment, project design and mitigation	Avoid or minimise impacts to submerged archaeological features.	Detailed geotechnical and geophysical survey campaigns undertaken prior to construction will be informed and guided by a suitably experienced and. qualified underwater archaeologist. The planned geophysical survey campaign will provide full coverage of all the final infrastructure locations, with broader project-area survey carried out at line spacing appropriate for archaeological purposes (including multibeam echosounder, side scan sonar, sub bottom profiler, and magnetometer). The geotechnical survey (cone penetration testing (CPT), vibro-coring (VC)) will sample targeted locations throughout the offshore project area where project infrastructure is intended to be installed and will include the provision of samples for geoarchaeological assessment.	Geophysical and Geotechnical Survey report.	Pre-Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			The datasets obtained from this survey campaign will be utilised to update the Submerged Palaeolandscape Assessment prior to construction, including: • Greater density of survey lines to identify features and inform subsequent geotechnical surveys • Assessment of geotechnical samples by specialist geoarchaeologist. The updated Submerged Palaeolandscape Assessment and the results of this survey campaign will in turn inform project design, mitigation, and the preparation of both the Cultural Heritage Management Plan (pertaining to State Waters, see SCH-M003; SCH-M007) and UCH Management Plan for Commonwealth Waters. Consultation will be undertaken with Gunaikurnai Land and Waters Aboriginal Corporation, the Commonwealth Department of Climate Change, Energy, the Environment and Water, Heritage Victoria, and First Peoples–State Relations on the findings and implications of the updated Submerged Palaeolandscape Assessment.		
SCH-M002	Geoarchaeological assessment to clarify the geoarchaeological and palaeoenvironmental potential of geotechnical samples	Avoid or minimise impacts to submerged archaeological features.	Undertake a geoarchaeological assessment of geotechnical logs and samples as appropriate for a defined and agreed mitigation campaign to clarify the geoarchaeological and palaeoenvironmental potential of geotechnical sequences recovered from the study area. This will involve identifying and describing samples of geoarchaeological potential by a suitably qualified marine geoarchaeologist, in order to clarify the nature of the sediments, and their mode of deposition. This assessment will be undertaken prior to construction and include the following: • Description of sediment sequences assigned medium and high priority status during the initial review of logs obtained for geotechnical (engineering) purposes. • Modelling the character, extent and depth of deposits; • Interpreting the probable environments represented;	Geoarchaeological assessment report.	Pre-Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Determining the importance of the deposits, with regard to their archaeological and palaeoenvironmental potential, and; • Recommendations for dating and palaeoenvironmental assessment as appropriate, in order to understand the preservation and changing nature of the human landscapes of the study area, to address specific questions reflecting the scientific and cultural value of the evidence preserved in the stratigraphic sequences. The geoarchaeological assessment will inform the update to the Submerged Palaeolandscape Assessment (also see SCH-M001) and inform the preparation of both the Cultural Heritage Management Plan (SCH-M003; SCH-M007) and Underwater Cultural Heritage Management Plan for Commonwealth Waters.		
SCH-M003	The preparation of a Cultural Heritage Management Plan with conditions pertaining to Submerged Aboriginal Cultural Heritage in State Waters	Avoid, minimise and manage impacts to submerged archaeological features.	Prepare, gain approval, and implement conditions of a Cultural Heritage Management Plan (CHMP) in accordance with the Aboriginal Heritage Act 2006 (Vic). The CHMP will include specific conditions to avoid, mitigate, or manage impact to submerged Aboriginal cultural heritage located within State Waters (also see ACH-M01; ACH-M07).	Development of Cultural Heritage Management Plan.	Prepared and Approved Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning
SCH-M005	Inductions for Submerged Aboriginal Cultural Heritage	Manage impacts to accidentally impacted submerged archaeological features.	For project personnel whose activities may impact submerged palaeolandscapes receptors, Submerged Aboriginal Cultural Heritage inductions will ensure that personnel are aware of their obligations to report and protect Aboriginal cultural heritage under Commonwealth and State legislation including: • Aboriginal Cultural Heritage Act 2006 (Vic) • Underwater Cultural Heritage Act 2018 (Cth). The details of the Submerged Aboriginal Cultural Heritage induction requirements will be included as part of the Cultural Heritage Management Plan (SCH-M003) and Underwater Cultural Heritage Management Plan (SCH-M004). Also refer to UMH-M005 for non-Aboriginal underwater cultural heritage inductions.	Development of Underwater Cultural Heritage management plan.	Prepared and Agreed Pre-Construction. Deployed as needed during Pre-Construction, Construction, Operation, Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Historical heritage					

HHM-M001	Heritage awareness training	Manage the impacts of construction on historical heritage values through Contractor awareness.	Historical heritage
			Implement pre-start guidance/education for project staff in relation the protection of historical heritage places, including unexpected finds protocols prior to commencement on site.
			Historical archaeological heritage
			Implement historical archaeological heritage site induction to educate workforce operating around archaeological places, including unexpected finds protocols prior to commencement on site.
			The historical archaeological heritage induction must include:
			• The definition of an archaeological site
			• Describe traditional historical agricultural region sites
			• Demonstrate the existence and location of the Victorian Heritage Inventory sites throughout the project area
			• State that Consent from Heritage Victoria is required before disturbing a Victorian Heritage Inventory site
			• State the penalties associated with disturbing a site without Consent
			  • State that the Heritage Act 2017 provides blanket protection for archaeological sites including those that are unknown and not included in the Victorian Heritage Inventory
			• Present the unexpected heritage finds protocol
			• Provide images and examples of historical agricultural sites and artefacts including:
			  - Late nineteenth/early twentieth century homestead remains, cesspits and cisterns, and bottle/refuse dumps
			  - Nineteenth and early twentieth century glass bottles and ceramics, handmade bricks, primitive concrete, historical/forged nails, and small finds like nineteenth and early twentieth century coins, buttons, toothbrushes, combs, slate pens, and clay pipes.
				Site induction records as part of CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
HHM-M002	Managing accidental damage to potential heritage places	Avoid and minimise the impacts of construction on historical heritage values.	Install physical protection measures (hoarding/signage), where works are adjacent to potential historical heritage places prior to commencement of works.	Installation of protection measures as part of CEMP.	Construction
HHM-M003	Heritage unexpected finds protocols	Avoid, minimise and manage the impacts of construction on historical heritage values.	Establish unexpected finds protocol prior to commencement of works. This will include: Historical heritage • Cessation of works at subject location until assessment is undertaken • Notification of project heritage advisor (historical heritage) • Heritage advisor to review site (site visit, historic research etc. as required) and determine whether the site is of a level that relevant stakeholders (i.e. Council/Heritage Victoria) need to be informed Historical archaeological heritage Establish unexpected finds protocol (archaeological) prior to commencement of works. If during the course of works an unexpected archaeological find is identified the following measures will be implemented: • Stop work in the vicinity of the find • Barricade or otherwise close off a 5m exclusion zone around the find • Notify the Project Heritage Advisor (archaeologist) of the find • Project works may proceed outside the exclusion zone • The Heritage Advisor to review site (site inspection, research, consult with Heritage Victoria, as required) and determine whether a site card and/or further investigations are required. Management measures to be determined in association with heritage advisor and relevant stakeholders.	Development of an unexpected finds protocol.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
HHM-M004	Historic Heritage No Go Zones	Avoid and minimise the impacts of construction on historical heritage inventory (VHI) sites.	'Historical Heritage No Go Zones' must be established around the extent of any Victorian Heritage Inventory site within the project area or within 10m of the project area prior to commencement of works. • The 'Historical Heritage No Go Zone' must physically delineate the extent of the Victorian Heritage Inventory site (using flagging, temporary fencing etc) and include signage indicating that works cannot occur in that location without prior Consent from Heritage Victoria and the penalties associated with contravening this. • There area has one Victorian Heritage Inventory site adjacent to the study area, Former Residence, Woodside Beach Road (H8220-0025). • When a Victorian Heritage Inventory site is outside the project area, the 'Historical Heritage No Go Zone' must delineate the interface between the project area and the extent of the Victorian Heritage Inventory site, but does not have to encompass the full Victorian Heritage Inventory site extent. The delineation may be erected either at the edge of the project area (outside which works must not extend) or the edge of the extent of the Victorian Heritage Inventory site, as appropriate. • Works within the 'Historical Heritage No Go Zone' may only be conducted under a Consent issued by Heritage Victoria and under the supervision of an archaeologist (unless otherwise advised by the archaeologist).	Establishment of No Go Zones as part of CEMP.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
UMH-M001	Pre-Construction Archaeological Investigation	Avoid or minimise impacts to submerged archaeological features	Pre-construction, targeted non-destructive investigation will occur within sections of the Offshore Wind Farm Area (OWFA) and Offshore Cable Export Area (OECA). These investigations will inform refinement of the wind turbine generator array, inter-array cables, interlink cables and export cable route to avoid/minimise impacts to archaeological sites. The methodology for the targeted non-destructive investigation surveys will be developed in consultation with Heritage Victoria and the project maritime archaeologist and the methods may include, but not be limited to high-resolution geophysical surveys and remote operated vehicle (ROV) inspections. Adaptive Management: Should anomalies of potential underwater cultural heritage be detected by qualified maritime archaeologist, investigation of anomalies of high and medium diagnostic priority as potential archaeological items (such as the wreck of the schooner Sarah - VHR # S607) within or close to the placement infrastructure or where seabed disturbance will occur to confirm their locations and determine status.	Survey results for detailed design geophysical campaign and as-built records from pre-construction clearance survey.	Pre-construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
UMH-M002	Archaeological Exclusion zones	Avoid or minimise impacts to submerged archaeological features	Following the targeted pre-construction non-destructive investigations (UMH-M001), exclusion zones (with permitted activities) within the Offshore Project Area may be established prior to construction works occurring (seabed disturbance) for confirmed underwater cultural heritage (UCH) items that may be impacted by the positioning of project infrastructure, such as cable trenching or foundation installation. An Exclusion zone is a defined area where activities that can impact a heritage site are prohibited. Prohibited activities within these zones could include, but not be limited to, the establishment of no anchoring zones; or if the site is shallow, vessel movement over a certain size will not be allowed due to risk of propellor jet turbulence. The size of exclusion zones will be confirmed in consultation with Heritage Victoria and the project maritime archaeologist. Micro-siting around the defined exclusion zones will occur prior to construction. Exclusion zone sizes and locations will be documented in the project construction, operation and decommissioning environmental management plans. Exclusion zones will be maintained, resized, relocated, or removed in consultation with Heritage Victoria.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
UMH-M003	Underwater Cultural Heritage Management Plan	Avoid or minimise impacts to submerged archaeological features	An Underwater Cultural Heritage (UHC) Management Plan for assessment, monitoring and reporting protocols will be established and approved prior to construction to mitigate potential risks of negative impacts to items of UCH. The UCH management plan will also include permit requirements and procedures for any site-specific archaeological investigations and actions that maybe required for identified items of UCH. This plan should be developed by a qualified maritime archaeologist in consultation with Heritage Victoria and in accordance with relevant Commonwealth and State Guidelines. An Unexpected Finds Protocol (UFP) will be included as part of the UCH Management Plan. The UFP is to guide Project personnel on appropriate assessment and reporting measures in case any unknown, unrecorded and/or newly discovered UCH items are found during construction, operation and decommissioning of the project. The UCH item will need to be reported according to the notification protocols detailed in the UCH Management Plan.	Development of Underwater Cultural Heritage management plan	Pre-construction
UMH-M004	Site specific archaeological investigation	Minimise or manage impacts to submerged archaeological features	Adaptive management: Should it be deemed not reasonably practicable to avoid impacts to a confirmed underwater cultural heritage (UCH) item, a program of site-specific archaeological investigation aligned with the principles of the 2001 UNESCO Convention should be undertaken. These investigations may include, but not be limited to, site recording, sampling, relocation or excavation. The methodology and research design to be approved by the appropriate authority as outlined in the UCHMP. Subject to the outcomes of such a program, further measures may be required to be implemented in consultation with and approved by Heritage Victoria.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
UMH-M005	Underwater cultural heritage induction	Minimise or manage impacts to submerged archaeological features	For project personnel whose activities may impact underwater cultural heritage, the project environmental induction will include an underwater cultural heritage induction. This induction is to make these personnel aware of their obligations to protect underwater cultural heritage under Commonwealth and State legislation relevant to UCH, including: -*Victorian Heritage Act 2017* -*Commonwealth Underwater Cultural Heritage Act 2018* The details of the underwater cultural heritage induction requirements will be included as part of the Underwater Cultural Heritage Management Plan.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
UMH-M006	Unexpected finds protocol	Minimise or manage impacts to submerged archaeological features	As part of the UCH Management Plan, site monitoring will be required for works taking place in the near vicinity of confirmed underwater cultural heritage (UCH) sites. The purpose of site monitoring is to prevent or minimise impacts to significant UCH items and monitor any changes to the site to determine if these are attributable to project activities. Site monitoring is to be undertaken by the project maritime archaeologist to minimise impacts. Adaptive Management: If confirmed UCH items are unavoidable (cannot be micro-sited around) then monitoring and adaptive management should be undertaken in consultation with the project maritime archaeologist. If confirmed significant or high potential significant UCH sites are identified, monitoring briefs will be required for works taking place in the near vicinity of items as part of the implementation of the UCH Management Plan. Monitoring is to be undertaken by the project maritime archaeologist to reduce impacts. The monitoring program would assess impacts on locations where site specific archaeological survey investigations have identified seabed features as being items of underwater cultural heritage (UCH) that are protected, or are likely to be protected, under the Commonwealth or State heritage legislation. Site monitoring could include, but not be limited to: 1. A baseline survey immediately prior to construction phase (methods could include side scan sonar, multi beam side scan, underwater remotely operated vehicle (ROV) or if appropriate direct diver inspection). 2. Periodic inspections during construction if risk of impact is considered significant. 3. Post construction inspection as soon as construction completed. 4. Depending on the site and the nature of the potential impacts, periodic inspections could continue for one or more years after completion. 5. Inspections for any breaches of Exclusion zones. The planning, methodology and analysis of the results of the monitoring should be conducted in consultation with Heritage Victoria and a qualified maritime archaeologist.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Business and tourism					
BTM-M001	Communications and Stakeholder Engagement Plan – business and tourism	Manage changes to local business and tourism through effective communication	A Communications and Stakeholder Engagement Plan will be developed in consultation with Wellington Shire Council and implemented prior to construction in accordance with TTP-M001 and SOC-M003. In relation to potential changes to local business and tourism during the construction phase, the plan will include communications, enquiries and complaints management procedures that allow feedback from Councils and the local community. Relevant business and community organisations will be included in stakeholder engagement activities.	Development of a Communications and Stakeholder Engagement Plan	Construction and operation
BTM-M002	Traffic Management Plan – business and tourism	Minimise construction traffic impacts.	The Traffic Management Plan required in TTP-M002 will include assessment and management of construction impacts and will be developed in consultation with relevant road authorities. In relation to business and tourism, the plan will include the programming of construction works to avoid major traffic changes during key holidays in the region, where possible.	Development of a Traffic Management Plan.	Construction
BTM-M003	Develop and implement a community benefit fund	Maximise opportunities for regional communities.	Develop and implement a community benefit fund, in consultation with the community and Councils. The governance structure for the Fund, including arrangements for administration and approval of funding, must be co-designed with relevant Councils and beneficiary communities.	Community benefit fund established and initiatives agreed and funded.	Construction and operation
BTM-M004	Consultation with Parks Victoria on Reeves Beach campground	Minimise and manage impacts to Reeves Beach campground during shore crossing works.	Consultation with Parks Victoria will be undertaken to identify and support management options of the Reeves Beach campground during construction of the project. Appropriate resources will be provided. Notification will be provided sufficiently in advance of affected periods and updated if timing or impacts change.	Correspondence with Parks Victoria and pre-construction notifications	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
BTM-M005	Workforce Development Strategy	Maximise commercial opportunities for Gippsland firms and workers.	Develop and implement a Workforce Development Strategy, in consultation with Councils and other stakeholders, that will identify project labour needs and how to maximise participation by Gippsland firms and Gippsland workers. The Workforce Development Strategy must include specific measures to identify workforce participation and procurement opportunities for the communities located closest to or affected by the project, and to minimise competition for local workers in areas or occupations experiencing labour shortages. The Workforce Development Strategy must consider workforce demand from other major projects and identify measures to minimise and impacts on local businesses if required.	Development of a Workforce Development Strategy	Construction and operation
BTM-M006	Workforce Accommodation Strategy	Minimise impacts of the project workforce on available accommodation providers within the local area.	Develop, update and implement the draft Workforce Accommodation Strategy prior to construction, in consultation with the relevant Councils and accommodation providers to minimise impacts of the project workforce on available accommodation providers within the local area (in accordance with SOC-M001). The Strategy must include: • monitoring, review and reporting requirements • appropriate thresholds or triggers for actions • contingency measures to respond to situations where impacts are greater than planned (including cumulative workforce accommodation demand from other major projects if required) In finalising and implementing the Strategy, the following actions will be undertaken: • Regular review and amendment of the Strategy, as required • Making available sufficient resources to actively plan, manage and monitor the Strategy. • Report on the broad Strategy outcomes to a Community Advisory Group or relevant Councils. If required, once the scale of the project and likely workforce is known with more certainty, collaborate with local authorities and other stakeholders to plan the provision of supplementary accommodation	Update and finalise the Workforce Accommodation Strategy.	Construction and operation

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Social					
SOC-M001	Workforce Accommodation Strategy	Minimise impacts of the project workforce on available accommodation providers within the local area.	Develop, update and implement the draft Workforce Accommodation Strategy prior to construction, in consultation with the relevant Councils and accommodation providers to minimise the impacts of the project's workforce during construction and operation on available accommodation within the local area.	Update and finalise the Workforce Accommodation Strategy.	Construction, Operation
SOC-M002	Medical Services	Avoid or minimise impacts to the availability of local GP services.	Clarify final workforce numbers prior to construction, and as necessary and appropriate, provide primary medical services at Gippsland Ports which may be used by construction workers, to reduce or avoid the need for workers to make use of GP services in the local area.	Record of number of workforce confirmed prior to construction	Construction
SOC-M003	Communications and Stakeholder Engagement Plan	Manages impacts to social receptor groups through effective communication.	A Communications and Stakeholder Engagement Plan will be developed in consultation with Wellington Shire Council and implemented during construction, and will include ~~including~~ the following in relation to social impact matters: • Information about construction sequencing to stakeholder such as fishing participants and users of the Reeves Beach Campground. • Provision of access to digital data on the location of wind turbines and OSS platforms, suitable for use by the fishing community. • Ensure Reeves Beach Campground users are informed regarding potential noise associated with construction~~,~~ (planned closures to the campground, etc. Notification will be provided sufficiently in advance of affected periods and updated if timing or impacts change.	Development of a Communications and Stakeholder Engagement Plan.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Agriculture and forestry					
AGM-M001	Compensation for economic impacts	Manage economic impacts on effected landholders.	Farmers and plantation operators will be compensated for economic losses that are a direct result of project activities during construction and operation. Fair and equitable payments will be made during the construction period and at handover as agreed with landholders. The process will include: • Definition of the specific losses, • Calculation and quantification of the value of the loss and • A process to seek independent expert advice to resolve disputes regarding the losses or calculation of value.	Individual negotiated landholder agreements.	Construction and operation
AGM-M002	Preparation of landholder specific Property Management Plans	Manage property impacts for effected landholders.	A Property Management Plan (PMP) will be developed as part of the construction license via consultation with each farm/forestry owner/manager for all directly affected properties. The Property Management Plan and construction license will include a process for landholder interactions (in relation to farm operations), documentation of the baseline conditions on the affected properties, a process to identify times when the project needs to make best endeavours to minimise works (such as during harvesting, lambing, calving), a dispute resolution processes, communication protocols, measures to meet farm access requirements (for movement of people, equipment and livestock), measures to manage disruptions of farm livestock and water supply, biosecurity requirements, and any other site-specific requirements to maintain the ongoing operation of the property. A suitably qualified agricultural specialist independent from the project will review and verify the implementation of the Property Management Plans.	Property Management Plan – PMP.	Construction and operation

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
AGM-M003	Soil management	Manage impacts to soils.	Management of soils during construction (trenching/stockpiling/reinstatement) will be undertaken in accordance with best practice guidance including EPA Publication 1828, 1834 and 1894. This practice will include following guidance from Earth Resources Victoria, regarding appropriate compaction management, profiling and erosion control during reinstatement.	CEMP to include descriptions as to how topsoil and subsoil stockpiles are stabilised, reinstated areas demonstrate stable soil profiles, with topsoil replaced to original depth.	Construction
AGM-M004	Pasture rehabilitation	Manage impact to pasture quality for effected landholders.	Prior to release of the construction licence area to the landholder, pasture rehabilitation will be undertaken such that it is returned to a condition as near as practicable to the condition that existed immediately prior to the occupation of the project or as otherwise agreed to. This condition will be set by the baseline condition included in the Property Management Plan. There will also be a process to seek independent expert advice to resolve disputes regarding the rehabilitation. The rehabilitation process, species mix, soil improvements, timing of pasture re-establishment, and weed control measures will be defined and documented in each landholder's Property Management Plan.	Inclusion of baseline conditions in PMPs, documentation to demonstrate this level has been reestablished prior to release of construction licence.	Construction and Operation
AGM-M005	Biosecurity management plan	Manage biosecurity risks associated with construction.	Comprehensive agriculture and forestry specific biosecurity procedures will be developed to industry standards, in consultation with agricultural specialists, landholders and Agriculture Victoria and include requirements for monitoring, auditing and enforcement. These procedures will form part of the overarching Construction Environmental Management Plan with property specific requirements covered under individual Property Management Plans. These requirements will apply to all company and contractor personnel, vehicles and equipment entering the site during project construction and operation. These biosecurity requirements will be incorporated into the Operation Environmental Management Plan for the project. There must be strict adherence to these biosecurity protocols.	Inclusion of specific biosecurity procedures in the CEMP and PMPs.	Construction and operation

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			The procedures will be developed in alignment with measures to prevent the introduction and spread of weeds and pathogens in the Biosecurity Management Plan (FFM-M007).		
AGM-M007	Plan for adverse weather conditions	Avoid and minimise impacts due to inclement weather conditions during construction.	Contingency plans will be developed and incorporated into the project's Construction Environmental Management Plan for inclement weather conditions, which will include specific consideration of the implications of these events on agriculture and forestry operations. Heavy vehicle movements when soils are saturated, particularly those occurring off the haul roads, will be minimised as far as reasonably practicable.	Inclusion of contingency plans for inclement weather conditions in the CEMP.	Construction
AGM-M008	Surface covers at joint bays	Manage impacts to property due to project infrastructure during operation	As part of operational activities, monitor surface covers and markers for damage and erosion. Where damage and erosion to project infrastructure is recorded, apply rectification measures.	Records of asset inspections, application of rectification measures (f required).	Operation
Land use and planning					
LUP-M001	Construction mitigation measures - land use planning	Minimise and manage potential environmental, social, and landholder-related impacts during construction.	The construction of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following frameworks and management plans to mitigate project impacts. Environmental management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Construction Environmental Management Plan which would include construction noise and vibration controls, air quality controls, and a traffic management plan. Workforce accommodation mitigations: • Preparation of a Workforce Accommodation Strategy and Workforce Accommodation Mitigations Framework should be updated in accordance with mitigation measure BTM-M006 and SOC-M001.	Development of; an EMF and associated EMPs (including the CEMP and relevant sub-plans), a Workforce Accommodation Strategy (including relevant Workforce Accommodation Mitigations Framework), and Property Management Plans.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
LUP-M002	Operation mitigation measures – land use planning	Minimise and manage potential environmental, social, and landholder-related impacts during operation.	The operation of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following frameworks and management plans to mitigate project impacts. Environmental Management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Operation Environmental Management Plan which would include construction noise and vibration controls, air quality controls, and a traffic management plan.	Development of an EMF and associated EMPs (including the OEMP and relevant sub-plans), and a OEMP Communications and S~~s~~takeholder ~~e~~Engagement ~~p~~Plan.	Operation
LUP-M003	Decommissioning mitigation measures - land use planning	Minimise and manage potential environmental, social, and landholder-related impacts during decommissioning.	The decommissioning of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following frameworks and management plans to mitigate project impacts. Environmental Management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Decommissioning Environmental Management Plan which would include construction noise and vibration controls, air quality controls, and a traffic management plan.	Development of an EMF and associated EMPs (including the DEMP and relevant sub-plans), and a DEMP Communications and S~~s~~takeholder ~~e~~Engagement ~~p~~Plan.	Decommissioning
UWN-M16	Bushfire management activities on public land	Potential impacts to bushfire management activities on public land are not adversely affected	During days of high fire danger, construction will be undertaken in accordance with the measures in Electricity Transmission Lines – Bushfire Management and Community Safety (page 10) (Victorian Government, 2023). Notification of works on public land will be provided to Parks Victoria and DEECA at least two months prior to commencement of works, including whether any potential road closures/impacts to the road network (refer also to TTP-M001).	Development of a CEMP	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Electromagnetic field exposure					
EME-M001	Prudent avoidance measures to avoid and minimise electromagnetic impacts in accordance with Energy Network Association (ENA) Electric And Magnetic Fields Management Handbook	Avoid and minimise electromagnetic impacts.	The following design elements will be incorporated into the cable design to ensure electromagnetic impacts are minimised where reasonably practical: • Maximise operation easement separation to habitable premises, where reasonably practical. • Minimise spacing of three phase conductors within each cable circuit, • Optimise phasing from a magnetic field cancellation perspective for all cable circuits within the trenched easement, • Position joint bays away from one another and from habitable premises, where reasonably practical, and • Position joint bays to obtain balanced cable lengths between earth pits, where reasonably practical. • A detailed study at the detailed design stage should be carried out if any major parameters change (e.g., circuit current, voltage, cable layout configuration, burial depth, or route alignment), to confirm compliance with the nominated reference levels.	Detailed design reports	Construction (detailed design)
Onshore noise and vibration					
ONV-M001	Managing noise and vibration from construction activities	Minimise and mitigate impacts associated with Construction noise, including construction traffic.	• Construction noise will be managed in accordance with EPA Victoria Publication 1834.2. This includes the development of a Construction Noise and Vibration Management Plan (CNVMP) to ensure, across all stages of the project, the relevant considerations and assessments will be made to ensure that noise (including from construction traffic) and vibration impacts will be minimised as far as reasonably practicable, consistent with the General Environment Duty (in accordance with Section 6(1) of the EP Act).	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• These measures are to be implemented pro-actively, wherever it is reasonably practicable to do so, and are not to be contingent on predicted exceedances of nominated criteria. • Prior to commencement of project works, develop a CNVMP that complies with the Environment Protection Act 2017 and subordinate legislation, including the general environmental duty, and with reference to the Civil construction, building and demolition guide (EPA Publication 1834.2, as amended from time to time) and Construction – guide to preventing harm to people and the environment (EPA Publication 1820.1, as amended from time to time). The CNVMP must be informed by noise and vibration modelling of Project works. The CNVMP must include: • Identification of noise and vibration sensitive receivers, including consideration of sensitive receivers that may be more sensitive during Normal Working Hours such as shift workers or agricultural operations or community events that are more sensitive at specific time of year. • Unattended noise monitoring, will be undertaken no more than six months prior to construction commencing, at the nearest noise sensitive area for a period of not less than seven days. Noise monitoring will be undertaken by a qualified acoustic consultant • Details of the measured period background levels, including a description of the variability of the background level across the noise survey in sufficient detail to inform criteria and scheduling of out of hours works as required by EPA Publication 1834.2.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage

			• Construction noise and vibration reference levels and criteria derived using the background at the time of impact. Any applicable criteria based on average levels shall be set to represent the background at the time of impact using the lowest period average taken during the survey. Note that full period averaging may overestimate the background at the time of impact. The measurement data shall be analysed in accordance with the recommendations of the Civil construction, building and demolition guide (EPA Publication 1834.2). In other words, if the survey collected data over several days (i.e. several day (LA90, 11hr), evening (integrating period depends on the day) and night (LA90, 9hr) period averages), then select the lowest period average for the purposes of setting the criteria
			• Details of relevant construction activities and an indicative schedule for construction works, including identification of the activities that have the potential to generate noise and/or vibration impacts at sensitive receivers.
			• A noise and vibration risk assessment for the operation of laydown areas
			• Batching locations are to be assessed against EPA Publication 1826.5, as amended from time to time.
			• How the risks of construction noise and vibration will be minimised as far as is reasonably practicable at all times.
			• Consideration of low frequency noise
			  • Consideration of the Environment Reference Standard
			• A program for monitoring and inspections to:
			  - Validate construction noise and vibration predictions.
			  - Assess the effectiveness of management measures
			  - Assess whether noise and vibration levels are being minimised so far as reasonably practicable
			  - Verify the noise predictions for Unavoidable Works and Managed-Impact Works.
			  - The general traffic management measures taken from Section 4.3.1 of EPA Victoria Publication 1834.2		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			- Offsite mitigation will be considered, where appropriate, in accordance with Section 4.3.5 of EPA Victoria Publication 1834.2 - The general communication steps taken from Section 4.3.2 of EPA Victoria Publication 1834.2 - The general good practice techniques taken from Section 4.3.3 of EPA Victoria Publication 1834.2. • Processes for reviewing and updating the modelling, plan and implemented controls in response to Project changes, changes to conditions, monitoring results or enquiries/complaints. • A process for unavoidable works, including: - Identification of unavoidable works that would be undertaken, including their location, timing and duration - A clear rationale for defining works as being unavoidable works, including a justification as to why it is not reasonably practicable to undertake them during normal working hours. The justification will be reviewed and verified by a suitably qualified specialist independent from the project. - Response strategies to mitigate the impacts of unavoidable works, consistent with EPA Publication 1834.2 (as amended from time to time). • A process for consideration of avoidable Low Impact and Managed Impact works outside of normal working hours: - These should be avoided unless a clear justification is provided as to why it is not reasonably practicable to undertake them during normal working hours. A typical justification could be safety or environment related but must not be due to the schedule or the budget. The justification will be reviewed and verified by a suitably qualified specialist independent from the project.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			- Where these works are justified, the activities must adhere to the definitions of “Low Impact” or “Managed Impact” works consistent with EPA Publication 1834.2 (as amended from time to time). - Unless a construction delivery is justified to be unavoidable (per the definition provided in EPA 1834.2), deliveries shall not be scheduled to arrive on site outside of EPA 1834.2 normal working hours. - If a delivery is delayed for any reason (for example traffic, breakdown or accident) such that it arrives at site outside of normal working hours then this shall be noted in a log, along with the reason for the delay. The log shall be reviewed at regular intervals to establish whether or not the current scheduling process is adequate to avoid deliveries arriving out of hours. • The CNVMP must be a sub plan to the CEMP and implemented during construction. • Specific consultation will be carried out with: • Parks Victoria and relevant user groups for Reeves Beach Campground and Natural Areas in the vicinity of the project. • Noise sensitive receptors within 1500 metres of the static cable system work sites (batching locations). • Noise sensitive receptors within 500 metres of a new or existing access track. • Noise sensitive receptors on the coast that could potentially be impacted by the offshore piling sections that are anticipated to generate higher levels of noise, such as sections containing adverse seabed geology. • All employees, contractors and subcontractors are to receive an environmental induction. The induction will include: • All relevant project specific and standard noise mitigation measures.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Relevant licence and approval conditions. • Permissible hours of work. • Any limitations on noise generating activities with special audible characteristics. • Location of nearest sensitive receptors. • Construction employee parking areas. • Designated loading/unloading areas and procedures. • Site opening/closing times (including deliveries). • Environmental incident procedures.		
ONV-M002	Out of hours construction noise mitigation measures	Minimise and Mitigate impacts associated with out of hours construction noise.	Where it can be demonstrated that it is not reasonably practicable to carry out the works during normal hours, construction works undertaken outside of EPA Victoria normal working hours, will implement all reasonably practicable mitigation measures to minimise the impact on nearby receptors, including the following: - Adopting engineering noise controls at the source (e.g. silencer, mufflers, enclosures) by the best reasonably practicable means - Installing on site barriers such as hoardings or temporary enclosures to provide a noise barrier between any particularly noisy construction works and the residences - Limiting works in proximity to receptors to the arrival of staff on site and toolbox meetings between 6 am and 7 am. The use of loud equipment, generation of unnecessary noise and the movement of vehicles on the construction footprint will be minimised, where reasonably practicable. - Provide respite offers that reflect the level of impact, and which are consistent with the projects community engagement commitments, for example, provision of movie tickets. It is noted that works undertaken outside of normal working hours are required to be justified and be managed on the basis of being “low impact”, “managed impact” or “unavoidable works” (as defined in EPA Publication 1834.2).	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			Unavoidable works will be identified and managed as either planned or unplanned activities. Avoidable works • For avoidable works during the evening or weekend periods, the construction noise risks will be assessed based on the variation in the measured background level (dB LA90, 1hr) during the relevant period(s). Works must be “Low Impact” or “Managed Impact” in accordance with EPA Publication 1834.2. • For avoidable works during the night, the construction noise risks will be assessed based on the lowest measured background level (dB LA90, 1hr). Avoidable works will not occur at night where they are likely to be audible within a residential premises, with night works limited to justified unavoidable works. Planned Unavoidable works • All unavoidable works that are planned for will be detailed in the Construction Environment Management Plan (CEMP), which will be reviewed and approved by ~~a qualified specialist~~ an environmental auditor in advance of the project commencing. • Unplanned Unavoidable or Unplanned out of hours works A list or rationale as to what defines acceptable unplanned unavoidable or unplanned out of hours work will be contained within the CEMP. The rationale will include the requirements for such works to occur and the required measures that will be considered to ensure the impacts will be effectively managed. • This will include the requirement for the preparation of a construction noise and vibration management plan for unplanned out-of-hours works.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• An environmental auditor ~~qualified specialist~~, with skills and expertise in ~~health, safety~~ acoustics and the environment as relevant, independent from the project will be appointed to review and verify all planned and unplanned night work (10:00 pm to 7:00 am) activities to ensure that the works have been reviewed and justified accordance with Section 4.4 of EPA 1834, that all reasonably practicable work practices have been considered, and that community engagement has been undertaken.		
ONV-M003	Vibration safe working distances	Minimise construction vibration impacts to sensitive receptors.	The project will reduce construction vibration as far as is reasonably practicable to avoid unnecessary noise impacts upon sensitive receptors in accordance with the EPA Victoria Publication 1834.2 and the General Environment Duty. Additional management measures will be implemented where occupancies, structures and assets are within the safe working distances derived using the values in the following standards: • British Standard BS 6472-1:2008: Table 1 – Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings • German Standard DIN4150-3:2016-12: Table 1 – Guideline values for vibration velocity for evaluating the effects of short-term vibration on structures • German Standard DIN4150-3:2016-12: Table 3 – Guideline values for vibration velocity for evaluating the effects of short-term vibration on buried pipework • An asset owner's utility standards in consultation with the asset owners.	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
ONV-M004	Transmission system construction – batch locations – noise control	Minimise and mitigate noise impacts associated with batching plants during construction.	Adoption of noise reduction measures to be installed to the batching plant locations as follows: • A noise barrier will be installed to the site boundary at a height of 2.4 metres or 500 mm greater than the highest point on a static noise source within the site, whichever is the higher. • Any access gates will be solid and generally kept closed. • Where reasonably practicable, installation of enclosures or localised noise barriers around static equipment to provide a noise barrier between any particularly noisy construction works and the residences. • Adopting engineering noise controls for ancillary equipment (e.g. silencer, mufflers, enclosures) by all reasonably practicable means. • Where reasonably practicable, the quietest available equipment should be selected. The impacts and the design of site-specific mitigation will be determined prior to construction works via noise modelling and confirmed during construction via on site monitoring.	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction
ONV-M005	Unavoidable works - Shore crossing drilling – noise control	Minimise and mitigate noise impacts associated with shore crossing drilling during construction.	Adoption of noise reduction measures to be installed adjacent to the shore crossing site as follows: • A noise barrier will be installed to the site boundary at a height of 2.4 metres. • Any access gates will be solid and generally kept closed, especially at night. • Where reasonably practicable, installation of enclosures or localised noise barriers around the shore crossing drilling equipment to provide a noise barrier between any particularly noisy construction works and the residences. • Adopting engineering noise controls for ancillary equipment (e.g. silencer, mufflers, enclosures) by all practical means using current technology. • Where reasonably practicable, the quietest available equipment or process should be selected.	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Where reasonably practicable, stationary equipment such as bentonite treatment, generators and pumps will be stored within shipping containers or suitable acoustic enclosures. The impacts and the design of site-specific mitigation will be determined prior to construction works via noise modelling and confirmed during construction via on site monitoring. An environmental auditor ~~qualified specialist~~, with skills and expertise in ~~health, safety~~ acoustics and the environment as relevant, will be appointed to review and verify all planned and unplanned night work (10:00 pm to 7:00 am) activities to ensure that the works have been reviewed and justified in accordance with Section 4.4 of EPA 1834, that all reasonably practicable work practices have been considered, and that community engagement has been undertaken. All planned unavoidable works will be detailed in the CEMP described in ONV-M002.		
ONV-M010	Decommissioning Environmental Management Plan - noise impacts	Minimise noise impacts associated with decommissioning.	A decommissioning environmental management plan that includes noise and vibration impacts will be developed in due time. Should mitigation measures specific to decommissioning be identified, these will be designed, documented and implemented as soon as is reasonably practicable. The general principles provided in ONV-M001, ONV-M002 and ONV-M003 will be adopted for the decommissioning stage.	Development of Decommissioning Plan.	Decommissioning
ONV-M007	Pre-construction noise assessment	Assess and manage impacts of wind turbine noise during operation.	As required by VPP clause 52.32-4, the proponent will provide a pre-construction (predictive) noise assessment report prepared by a suitably qualified and experienced acoustician that: • Reports on a pre-construction (predictive) noise assessment conducted in accordance with New Zealand Standard NZS6808:2010, Acoustics - Wind Farm Noise. • Provides an assessment of whether the proposed wind energy facility will comply with the noise limit for that facility under Division 5 Part 5.3 of the Environment Protection Regulations 2021.	Pre-construction (predictive) noise assessment.	Planning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Is prepared on the basis that the relevant noise standard under Division 5 of Part 5.3 of the Environment Protection Regulations 2021 will be New Zealand Standard NZS6808:2010, Acoustics - Wind Farm Noise and includes an assessment of whether a high amenity noise limit is applicable under Section 5.3 of the standard.		
Traffic and transport					
TTP-M001	Communications and Stakeholder Engagement Plan	Manages impacts to other road users through effective communication.	Implement a Communications and Stakeholder Engagement Plan to guide consultation with stakeholders during project construction, including in relation to transport matters. This includes engagement with relevant road authorities (including Wellington Shire Council). The plan will include mechanisms to obtain stakeholder input on transport management and protocols to give the community and other stakeholders adequate notice of any anticipated changes to transport conditions associated with works. While the Traffic Management Plan will detail the operational and safety aspects of traffic management and control, the plan will serve a broader function, ensuring transparent and ongoing communication throughout the project lifecycle.	Development and implementation of a Communications and Stakeholder engagement plan.	Construction
TTP-M002	Traffic Management Plan (TMP)	Manage impacts to maintain road safety and minimise disruptions to vehicle movements on roads during onshore construction.	Develop and implement a Traffic Management Plan (TMP) to support onshore construction traffic. The TMP will be established prior to construction commencement and will serve as both a mitigation and monitoring tool. It will contain measures to maintain road safety and to minimise disruption to vehicle movements on roads in the vicinity of the project, parking, on-road public transport and emergency vehicle access. The TMP will be developed in consultation with the relevant road management authorities and consider: • Planning approval conditions relating to traffic management. • Relevant policy, regulatory and protocol requirements specific to construction traffic management. • Review and verification of existing conditions at the time the TMP is developed.	Development and implementation of a Traffic Management Plan.	Pre-construction (prepare) Construction (implement)

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Approved project scope including finalised details on construction extents, staging, vehicle types, origins and destinations for construction materials and spoil) and peaks of construction activity. • Cumulative impacts of other major projects in the local area which may change traffic conditions. • Verification of the final site access strategy, including staging nodes and secondary access points and crossovers to work sites (see TTP-M004 - Heavy vehicle transport route assessments). Upgrades at proposed access points will be subject to approval of relevant road authorities. • Other mitigation measures outlined in the transport impact assessment, including primary site access and secondary access requirements and heavy vehicle transport routes. The TMP mitigation measures will include: • Management of temporary road and traffic lane closures to maintain existing connectivity for local access, minimise the number and duration of closures and planning closures to occur outside of peak traffic periods. This includes the provision of adequate notice to local residents and communities and advisory signage such as variable message signs and protocols to ensure Parks Victoria and the Department of Energy, Environment and Climate Action are notified at least two months prior to commencement of works, including whether any potential road closures/impacts to the road network. A review of existing bus services should also be undertaken to confirm public and/or school bus services that may be affected prior to construction commencement and ensure minimal disruptions to school bus operation.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Development of suitable measures to ensure emergency service access (notably fire) is not inhibited by project construction activities. This will be done through engagement with emergency services to ensure access is maintained, especially during any public road and traffic lane closures. These requirements should be included as part of any broader emergency management plan that may be developed for the project. • Management of car parking associated with construction works to ensure that car parking is contained within the project boundary. If required car share or shuttle bus provisions will be considered. • Routes to be used for construction vehicles travelling to and from the construction sites, recognising sensitive receptors, local access requirements and road users' safety to be agreed upon with relevant road authorities. • Pre-construction on-site checks to assess route options for safety and clearance to potential obstructions, such as wires, structures and trees for Oversize Overmass vehicles. • Requirement for pre-construction dilapidation surveys to be undertaken. This will include documentation of the condition of pavements and other road infrastructure such as bridges and culverts for roads which are to be utilised by construction traffic. Consultation with road asset owners will be undertaken to agree on the extent of pre-condition (dilapidation survey) survey extents and survey requirements (specialist vehicle condition or photographic), road maintenance criteria, treatments and response timeframes, post construction surveys, asset hand-back agreements and remediation should the project have an adverse impact on road condition. • Engagement with public and private bus operators (particularly operators of school buses) to provide information on transport changes anticipated as a consequence of construction including road and lane closures.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Temporary speed limits as appropriate to maintain intersection safety in the vicinity of primary site access and secondary access points with non-conforming sight distances on local roads, such as a reduced speed limit of 60 - 80km/h, particularly for limited durations during higher-risk construction periods. Temporary speed limit changes are subject to approval from relevant road authorities i.e. councils for local roads and the Department of Transport and Planning for arterial roads. • Provision of signage in accordance with Australian Standard AS 1742 indicating: - Locations of temporary speed limits - Movement of trucks from site access points to and from major road connections - Access points where trucks are not permitted to enter. • Management of the risk of adverse impacts to road condition, operational efficiency and safety for road users associated with heavy vehicle movements on construction traffic routes. Where constraints are identified, mitigation measures such as temporary traffic controls, structural risk management and local road safety enhancements should be developed and managed as part of the project TMP in agreement with road authorities. • Provision of safe access to laydown areas and site compounds • Asset maintenance measures in agreement with relevant road authorities along nominated heavy vehicle routes. • Consideration of a driver's code of conduct for heavy vehicle drivers in consultation with the nominated transport contractor. The code of conduct is to include information relating to worker behaviour and adherence to the TMP and other matters (i.e. using approved routes, compliance with speed limits, parking in designated areas etc.). A list of measures to be outlined in the code of conduct include: - Inductions to inform workers of safety expectations travelling to and from the site and activities on site		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			- Toolbox talks held at the start of the day/shift to discuss potential hazards - Regular inspections to ensure safe work practices - Vehicle registration numbers to be provided to the project for following up of any driver complaints. • Protocols to give the community and other stakeholders adequate notice of any anticipated changes to transport conditions in accordance with TTP-M001 – Communications and Stakeholder Engagement Plan. • Verify operating and working hours for construction. These will be consulted with key stakeholders. Construction will be in accordance with the approvals for unavoidable works as per EPA Victoria Publication 1834.2. • Implementation of control measures to minimise safety risk related to traffic and transport in case of inclement weather. • Minimisation of dirt and debris on roads by measures such as street sweeping, covering vehicle loads and vehicle cleaning. Other measures include wheel washes and sealing of access bell mouths. • Minimisation of noise and vibration impacts to sensitive receptors such as residences and schools by altering timing of travel to ensure reduced major works impacts where reasonably practicable (for example Woodside Primary School). • Minimisation of the need to transport waste from the site by reuse of materials where reasonably practicable. The TMP would set out a framework for subsequent development of work site specific TMPs by selected construction contractors where required. These specific TMPs would include further detail on the proposed management of transport issues on individual sites.		
TTP-M003	Road safety audits (RSAs)	Avoid and minimise road safety risks.	Road safety audits (RSAs) will be undertaken during the detailed design phase and prior to construction commencement to confirm the adequacy of roads for the proposed construction activities. These would indicatively occur at:	Records of Road Safety Audits and results.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Access points i.e. staging nodes and secondary access points onto both minor and major roads • Access roads and roads to be used and their intersections with the public road network • Along Hyland Highway (Traralgon Creek Road) and Hazelwood Road due to the crash history. RSAs will include consideration of emergency vehicle access and if road surface upgrades are required. RSAs will be completed by a pre-qualified RSA auditor from the Department of Transport and Planning and be independent to the project.		
TTP-M004	Heavy vehicle transport route assessments	Manage the safe, efficient, and compliant transport of B-double and oversize over-mass loads during construction.	An assessment of the proposed B-Double and Oversize Overmass transport routes between origins and destinations for oversize, loads, bulk materials and spoil will be undertaken once these have been confirmed. This will be undertaken prior to construction commencement and will include investigation of clearance to potential obstructions, such as wires, structures (bridges and culverts) and trees. The assessment will be completed by a transport specialist and conducted in consultation with relevant road authorities (including Councils) and other stakeholders and will identify any additional mitigation measures required.	Assessment report of proposed B-Double and Oversize Overmass transport route.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
TTP-M005	Site access strategy	Manage safe access to construction sites.	A site access strategy will be developed in consultation with relevant road authorities and other stakeholders such as landowners, prior to construction commencement. The strategy will focus on locations and arrangements for site access points (primary and secondary) that will be investigated further to ensure safe entry and egress for construction vehicles (including heavy vehicles). This will include consideration of potential road section upgrade and appropriate design of access points intersecting with the public road network as required. It will take into consideration the existing local plantation traffic access and movements and other local amenities or facilities (including parks and reserves) in the vicinity of the access points. During detailed design the posted speed limit of roads intersecting with site access points will be reviewed and verified, where appropriate sight distances at site access points cannot be achieved. Any temporary speed limit change that may be considered is noted to be subject to approval from relevant road authorities i.e. councils for local roads and the Department of Transport and Planning responsible for arterial roads.	Development of a site access strategy as part of Traffic Management Plan.	Construction
Air quality					
AQM-M001	General dust management	Management of dust impacts associated with construction.	• Minimise vegetation disturbance • Minimising the extent of disturbance as far as practicable • Minimise drop heights from loading or handling equipment • Locate stockpiles away from the residential areas and other sensitive receivers, if possible • Keep stockpiles for shortest time possible • Revegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable. • Dust suppression will be used at construction areas, temporary access tracks and batching plants as required using water sprays, water carts, screens or other devices on: unpaved work areas sand, spoil and aggregate stockpiles	Inclusion and implementation of dust suppression measures in CEMP.	Construction and decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			during the loading and unloading of dust generating materials. • Storage bays at batching plants to be enclosed on three sides and aggregate to be kept at least 0.5 metres below the top of panels and inside open end of bays. If required, additional screening over and above wall height can be installed.		
AQM-M002	Vehicle and mobile equipment operation requirements	Management of air emissions and dust impacts associated with construction.	• After arrival at the project site, vehicles, plant and equipment will remain within the construction footprint and designated areas. • Switch off engines when parked and/or minimise idling as far as reasonably practicable. • Limit vehicle speeds onsite to minimise the generation of dust in accordance with the EPA Publication 1834.2—Civil Construction, Building and Demolition Guide.	Inclusion and implementation of air emissions management dust suppression measures in CEMP.	Construction, operation and decommissioning
AQM-M003	Stabilise temporary access tracks	Management of dust impacts associated with construction.	Crushed rock, crushed recycled concrete or other suitable material will be placed on existing unsealed access tracks if required and as agreed with relevant stakeholders to prevent vehicle movements raising dust.	Inclusion and implementation of dust suppression measures in CEMP.	Construction, operation and decommissioning
AQM-M004	Covering vehicle loads	Management of dust impacts associated with construction vehicles on public roads.	Construction vehicles with potential for loss of loads (such as dust or litter) will be covered when using public roads.	Inclusion and implementation of dust suppression measures in CEMP.	Construction and decommissioning
AQM-M007	Odorous soils management	Management of odour impacts associated with construction.	In the event that odorous soils are uncovered during construction, the following measures will be undertaken: • Cessation of ground disturbance at the location and within the immediate vicinity. • Assessment of site contamination and determination of appropriate management actions in consultation with suitably qualified personnel.	Stop works record and contamination assessment (if required).	Construction and decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• If odorous material is found to be contaminated, notification to relevant authorities would be conducted in accordance with duty-to-notify requirements under the Environment Protection Act 2017.		
AQM-M008	Equipment maintenance and emission control	Management of air emissions.	• Plant and equipment will be maintained in good condition to minimise spills and air emissions that may cause nuisance. • Diesel vehicles and machinery will be fitted with diesel particulate filters.	Inclusion and implementation of air emissions management dust suppression measures in CEMP.	Construction, operation and decommissioning
AQM-M009	Site management for air quality and emission control	Management of dust and air quality impacts associated with construction.	• Personnel whose work could impact air quality related aspects should receive appropriate induction prior to working on the project site to ensure understanding of what actions/behaviours would be required to minimise nuisance dust and other air emissions. • Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Record any incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation.	Inclusion of induction, complaints, and incident records as part of CEMP.	Construction, operation and decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
Victorian marine environment					
BHC-M01	Pre-construction geophysical survey – avoidance of high profile reef	Avoid direct impact to high profile reef.	A pre-construction non-destructive investigation (high-resolution geophysical surveys and/or remotely operated vehicle inspections) survey will be undertaken along the proposed cable routes (export cable, inter-array and interlink cables) and where foundations will be located within the Offshore Project Area (OPA). The targeted survey will be used to determine the location and extent of any high-profile reefs (reef greater than 0.5 metres) within the OPA. Should high-profile reef features be identified where infrastructure (such as foundations or cable trenching) is proposed to be located, appropriate measures (e.g. micro-siting) will be implemented to avoid direct impacts to these features, and on the basis of the extent of these features at the time of construction. A revision to the layout will be undertaken as per mitigation measure SNV-M11 and confirmed by the relevant Statutory Authority.	Survey results for detailed design geophysical campaign and as-built records from pre-construction clearance survey.	Pre-construction
BHC-M02	Pre-construction Seagrass distribution survey	Minimise direct impacts to seagrass beds	Seagrass distribution will be mapped pre-construction in Victorian waters based on the proposed export cable routes to enable the application of the mitigation hierarchy and to inform the application of a Flora and Fauna Guarantee Permit, if required.	Seagrass survey report and distribution maps. Flora and Fauna Guarantee Permit application (if required)	Pre-construction
EMI-M01	Depth of Cable burial	Minimise exposure of marine fauna to Electromagnetic fields. Minimise likelihood of vessel anchor / fishing gear interactions with cables.	Subsea cables will have a minimum depth of lowering (MDoL) of 1.0 metres for offshore export cable and 0.6 metres for inter-array cables.	Post-lay survey Report confirming cable burial depths and Ongoing monitoring of cable position and depth below the seabed (MEMP-M09).	Construction Operation

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
LIT-M02	Vessel Artificial Light management	Minimise effects of vessel light spill on seabirds.	Routine monitoring on vessels will be undertaken to measure and detect the impacts of lighting and determine the extent of seabird fallout on vessels. If pre-defined trigger values for birds being attracted to vessels at night resulting in fallout are reached this will initiate review of the impact assessment and additional adaptive management depending on the species affected. See Section 16.3 for more detail. Vessel lighting will comply with the National Light Pollution Guidelines for Wildlife (DCCEEW, 2023), to limit the effects of artificial lighting on seabirds where these do not conflict with safety (i.e. needed for safe work and navigation). This includes: • the minimisation of light spill; • avoidance of long wavelength light sources; • avoidance of blue, violet or ultra-violet wavelengths; and • lighting in each maintenance area will be kept to the minimum requirement for safe passage when personnel are not required to be working in the area.	Development of Marine Operation Framework.	Construction Operations Decommissioning
OFF-M02	Marine debris Minimisation	Avoid impacts of marine debris on marine fauna.	During all phases of the project, all activities will be undertaken in accordance with the management actions provided in the Commonwealth “Threat abatement plan for the impacts of marine debris on the vertebrate wildlife of Australia’s coasts and ocean (2018)” to limit impacts of marine debris on sensitive marine receptors. The project will take practicable actions to avoid and minimise the loss of marine debris from offshore installations and project vessels. Appropriate training will be communicated during crew induction (OFF-M04). In the event of debris lost, if practicable, Star of the South will retrieve the debris. Reporting and monitoring will be undertaken according to the Environmental Management Framework.	Vessel crew Induction record and Notification reporting of debris loss.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
OFF-M04	Low Toxicity Marine drilling fluids	Minimise reductions in water quality.	During the construction period, only water-based drilling fluids (such as those containing xanthan gum and bentonite, or low toxicity alternatives) will be used for marine drilling activities, including trenchless installation of the shore crossing (at Reeves Beach) and drilling monopiles in the Offshore Windfarm Area (OWA) in the event of pile refusal. Low toxicity fluids will limit potential environmental harm, including impacts to sensitive marine receptors associated with decreased water quality.	Development of a Construction Environmental Management Plan	Construction
OFF-M05	Shore crossing Methodology	Minimise disturbance of shorebird habitat.	The project will commit to trenchless installation methods at the Reeves Beach shore crossing during the construction phase to minimise impacts to beach and dune shorebird habitat. Trenchless installation will be within the bounds of the project design envelope and include the following measures to avoid and minimise impacts to biodiversity values: • A suitably trained ecologist will check the beach for signs of nesting habitat for Hooded Plover. Should any nests be found, signage and designated no-go areas will be established to ensure impacts are avoided. • All construction equipment will be removed following the completion of construction and the ground conditions restored to agreed rehabilitation standards.	Development of a Construction Environmental Management Plan.	Construction
OFF-M10	Notice to Mariners	Minimise likelihood of vessel collisions and allisions.	During all phases of the project, distribution of Notices To Mariners (NTMs) via the Australian Maritime Safety Authority (AMSA) and Safe Transport Victoria (STV) to notify third-party vessel operators of project vessel movements, the establishment of safety zones, and the placement of permanent infrastructure (see SNV-M09 Charting of final layout on navigational charts). NTMs will provide advice on aids to navigation (AtoNs), safety issues, dangers or hazards to navigation.	Record of Notice to Mariners publications.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			All NTMs will be published on the Australian Hydrographic Office (AHO) website and other local reporting as specified by the regulator. The Australian Maritime Safety Authority – Rescue Coordination Centre (AMSA - RCC) will also be advised of all project vessels' details, satellite communications and area of operation, as well as the relevant port authority. NTMs will be issued frequently for changes during construction and the schedule for issuing notices will be defined in consultation with AHO, AMSA and STV. Following completion of construction, a NTM will be issued to signal a change in the project phase from construction to operations, and the types of vessels that will be operating in the area for the next 30 years.		
OFF-M22	Stakeholder consultation	Manages impacts to other marine users receptor groups through effective communication.	Stakeholder engagement will be undertaken during all phases of the project to ensure stakeholders have opportunities to raise issues and feedback, and for these to be assessed and responded to appropriately. Stakeholder communications will provide regular updates and advanced notice of planned activities throughout the project's construction, operations and decommissioning, so that stakeholders (including maritime users) can manage their activities accordingly. A range of accessible communication and engagement methods will be adopted to reach relevant stakeholders, including traditional (notifications, posters, meetings) and digital (social media, website) tools.	Development of a Communications and Stakeholder Engagement Plan.	Construction Operations Decommissioning
SNV-M04	Cable burial risk assessment	Minimise likelihood of interactions with other marine users.	A cable burial risk assessment will be undertaken as part of detailed design to ensure that cables will be buried to adequate depth, for the safety of other marine users. Factors considered include shipping activity, use of anchors, fishing activity, substrate type and metocean conditions. Where possible cable burial will be the preferred option for cable protection. Where sufficient depth of cover cannot be achieved during installation, remedial protection will be used.	Cable burial risk assessment report.	Operations

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SNV-M05	Project vessel safety requirements	Minimise the likelihood of vessel collisions and spills.	During all phases of the project, all project vessels will have a safety management system (SMS) that will be signed off prior to use, ensuring compliance with relevant Australian and Victorian maritime regulations (including the Commonwealth Navigational Safety Act 2012, and the Victorian Marine Safety Act 2012), including vessel certification and licencing, pilotage requirements and local knowledge certification (Corner Inlet). Project vessels will comply with incident reporting as required by Safe Transport Victoria (STV) and the Australian Maritime Safety Authority (AMSA). All vessels transiting from Port will adhere to International Association of Marine Aids to Navigation and Lighthouse Authorities' (IALA's) vessel traffic services (VTS) marine traffic guidelines. Project vessels using Corner Inlet must also hold a Certificate of Local Knowledge while entering, leaving or navigating within the Port of Corner inlet, as required by Safe Transport Victoria (STV) and Gippsland Ports. This ensures that all operators have an understanding of the local conditions, marine traffic and navigational aids.	Development of Marine Operation Framework#.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
SNV-M07	Vessel Passage Plan	Minimise likelihood of vessel collisions.	During all phases of the project, a Vessel Passage Plan (VPP) will be produced by the vessel 'master for navigation' for relevant vessels entering Corner Inlet, in consultation with the Gippsland Ports Harbour Master as per requirements set out in the Port Information Handbook for the Port of Corner Inlet and Port Albert. The VPP is required on the first entry to the Port of Corner Inlet for relevant vessel classes, or if the vessel has not entered for a period exceeding six months. The vessel master must submit to the Harbour Master (or their delegate) a formal passage plan, to be lodged with the Notification of Arrival/Departure and Application for Berth form. The VPP, provides active management of vessels to reduce the choke points and provision of safe separation distances limiting impacts to third-party vessels and port congestion.	Development of Vessel Passage Plan#.	Construction Operations Decommissioning
SNV-M09	Charting of final layout on navigational charts	Minimise likelihood of vessel collisions and allisions.	Appropriate marking of offshore structures (both within the Offshore Windfarm Area (OWA) and Offshore Export Cable Area (OECA)), including the position of foundations and cables, on the Australian Hydrographic Office (AHO) nautical charts. Star of the South will provide as laid (final positioning) coordinates of project infrastructure to the AHO for charting. The timing of charting will be in consultation with the AHO and other relevant stakeholders such as the Australian Maritime Safety Authority and the Offshore Infrastructure Regulator, to determine if marking of infrastructure is done progressively or once construction has been fully completed. The purpose of charting is to maximise awareness of the project allowing vessels to passage plan in advance.	Submission of as-built information to Australian Hydrographic Office.	Construction Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
CRF-M08	Compensation for impacted commercial fishers	Minimise economic impact to effected commercial fisheries.	The project seeks to coexist with other users of the marine environment, including commercial fishers. In any instances where coexistence is not safe or practical and other options to mitigate the impact have been exhausted, compensation will be provided as redress for commercial fishers that are affected by project activities (during all phases of the project). The project will develop, implement and maintain a Fisheries Liaison and Coexistence Plan ~~prior to construction and~~ which will apply throughout all relevant phases of the Project and must be incorporated into, or referenced by, the CEMP or OEMP as relevant. The Plan will describe the process through which potentially impacted commercial fishers can lodge a claim and be fairly assessed for compensation. The Fisheries Liaison and Coexistence Plan will include arrangements for: • consulting with affected commercial fishers • minimising interference with fishing activities, where reasonably practicable • providing advance notification of fishing restrictions • identifying eligibility, assessment of claims and dispute resolution processes for compensation claims.	Development of the Fisheries Liaison and Coexistence plan#.	Pre-construction (preparation of plan) Construction, operation and decommissioning (implementation) ~~All phases~~
CRF-M09	Opportunities for work on the project	Maximise commercial opportunities for commercial fisheries operators.	The project will endeavour to provide opportunities for commercial fishers to obtain work on the project. Examples of opportunities include guard vessel duties, environmental monitoring or surveys. Information on project-related opportunities and the process for local industry to express interest in being involved will be shared during all phases of the project.	Development of the Fisheries Liaison and Coexistence plan#.	All phases

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage

SPL-M01	Refuelling and resupply limitations	Minimises the likelihood of a Marine Gas Oil (MGO) spill during vessel refuelling / resupply	To minimise the likelihood of vessel collision and hydrocarbon release, project vessels (during all phases of the project) will comply with all statutory requirements, including MARPOL (Marine Order 97). This includes the following refuelling measures:
			• Wherever possible, routine refuelling of project vessels will occur in port;
			  • Should refuelling be required at sea, refuelling will not occur within shipping lanes or areas of high traffic to minimise the likelihood of vessel collision and fuel spill.
			• Vessel fuel must only contain a maximum sulfur content of 0.50 per cent m/m in compliance with MARPOL and Marine Order 97.
			• Materials and equipment that have the potential to spill onto the deck or into the marine environment will be stored within a contained area.
			• Spill response kits will be available and routinely checked to ensure adequate stock is maintained.
			• Bunkering and bulk liquids will be transferred in accordance with bulk transfer procedures to reduce the risk of an unintentional release to sea during transfer. The procedures include standards for:
			  - Certified equipment with confirmed integrity (e.g. hose and valves).
			  - Transfer process (e.g. safety, communication, monitoring, inventory, emergency shut down procedures, procedural documents, and spill incident details).
				Development of Marine Operation Framework#	Construction
					Operations
					Decommissioning

SPL-M02	Spill Response Plan	Minimise the exposure time and area for oil spills.	Develop, implement and maintain a Spill Response Plan (SRP) in consultation with the Department of Transport and Planning for accidental hydrocarbon release from project activities within the marine environment, including prevention, response and management during all project phases to minimise risk to sensitive marine receptors. The SRP describes first strike management measures (initial response measures) for vessel spills until the Australian Maritime Safety Authority (AMSA) takes over the response as the designated Control Agency for vessel spills. If a spill was to occur the SRP would be activated and will include the following:	Development of Spill Response Plan#.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Initial response measures. • Notification and reporting requirements. • Determine if oil spill modelling and/or tracking buoys are required. • Monitoring of the spill such as water quality monitoring. • Response tactics to be implemented, such as subsea or surface dispersants, mechanical dispersion, containment and recovery and in-situ burning, depending on the nature and scale of the spill. • Determine if shoreline protection and deflection and shoreline clean up are needed. • Monitoring and assessment of ecological impacts.		
VES-M01	Vessel Operations Framework	Minimise the likelihood of vessel collisions and spills Minimise reduction in water quality.	To ensure vessel safety and to reduce the risk of accidents (such as vessel collision and fuel spills) the project will develop, implement and maintain a vessel operations framework to be approved by the regulator, in accordance with International and Australian maritime legislation, including: • the Convention on the International Regulations for Preventing Collisions at Sea (COLREGS) (implemented in Australia by Marine Order 30 (Prevention of collisions) 2016), • the International Convention for the Safety of Life at Sea (SOLAS) as part of the Navigation Act 2012 (lights and signals to be used by a vessel and to reduce potential vessel collisions), • the International Convention for the Prevention of Pollution from Ships (MARPOL) (regulations aimed at preventing both accidental pollution and pollution from routine vessel operations) implemented through the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Commonwealth), the Navigation Act 2012 (Commonwealth) and the Pollution of Waters by Oil and Noxious Substances Act 1986 (Victoria).	Development of Marine Operation Framework#.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			All project vessels will ensure that they are operated in accordance with this framework (as required by vessel size and class) during every project stage (construction, operation and decommissioning) within both Commonwealth and State Waters (including at Port, transiting to and from the offshore project area and within the offshore project area). Star of the South will ensure that prior to procuring project vessels, all vessels have a record of inspections and compliance.		
VES-M03	Marine coordination centre	Minimise the likelihood of vessel collisions and allision.	To minimise risk of third-party vessel interactions, a Marine Coordination Centre (MCC) will manage movements of project vessels to and within the Offshore Project Area (OPA). The marine coordination centre will also monitor third party vessels and aircraft around the project area. The marine coordination centre will operate 24/7 in the construction phase and in the operations phase it will be staffed during working hours and operate 24/7 during large scale maintenance campaigns such as blade replacement.	Marine Coordination centre operational records.	Construction Operations Decommissioning
VES-M04	Vessel movement controls	Minimise the likelihood of vessel collisions.	To reduce the likelihood of interactions with third party vessels or an accidental hydrocarbon release from a vessel collision occurring within the marine environment the following measures will be applied: • All construction, operations and decommissioning activities will occur within the designated Offshore Project Area (OPA) • Project vessels will use defined shipping routes between construction feeder ports and the OPA, as well as within Corner Inlet. Vessel routes will be further defined in consultation with relevant stakeholders. Deviation from recommended routes can occur for safety or environmental reasons. • All project vessels that require dynamic positioning (DP) will comply with the DP Certification scheme.	Development of Marine Operation Framework#.	Construction Operations Decommissioning
VES-M05	Vessel biosecurity controls	Minimise the likelihood of introducing invasive marine species.	Project vessels and subsea equipment will be compliant with relevant biosecurity legislation and guidelines, including: • Prior to commencing project activities, all installation and support vessels will have a project-approved Ballast Water Management Plan and a Ballast Water Management Certificate.	Development of Marine Operation Framework# and audit of project vessels.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Reporting and management of ballast water will be in accordance with The Biosecurity Act 2015 and the Ballast Water Management Convention's Guidelines for Ballast Water Management and Development of Ballast Water Management Plans. • An Invasive Marine Species (IMS) risk Assessment Procedure (IMS- RAP) will be undertaken in accordance with the International Maritime Organisation Guidelines for the Management of Ships Biofouling for all vessels undertaking project activities, and the vessel will be confirmed to be a low biosecurity risk before approval to enter the Offshore Project Area (OPA) and Corner Inlet. • Biosecurity clearance prior to entering Australian Waters for foreign vessels: ○ Vessels that are intending to discharge internationally sourced ballast water within Australian waters must submit a Ballast Water Report through Maritime Arrivals Reporting System (MARS) at least 12 hours prior to arrival to gain biosecurity clearance. • Ballast tank sediment must be disposed of in an area outside 200 nautical miles from the nearest land, and in at least a depth of 200 metres, or at an approved land-based reception facility. • Management of anti-fouling and in-water cleaning in accordance with the Australian anti-fouling and in-water cleaning guidelines.		

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
VES-M06	Vessel collision - marine mammals	Minimises vessel disturbance and likelihood of vessel strike to marine mammals and turtles.	All project vessels will implement the following requirements during all project phases (construction, operation and decommissioning) as prescribed by the EPBC Regulations 2000 Part 8 and Victorian State Wildlife (Marine Mammal) Regulations 2019 to minimise the risk of collision with a whale or dolphin: • Implementation of 'no approach' and 'caution' zones for whales, dolphins and seals: - No approach zone (whales): within 100 metres of a whale, and within 300 metres to the front and rear of a whale - No approach zone (dolphins): within 50 metres of a dolphin, and 150 metres in front and to the rear of a dolphin o No approach zone (seals): within 30 metres of a seal, if the seal is on land or a haul out; or within 5 metres if the seal is on water infrastructure within state waters - Caution zone (whales): within 300 metres of a whale - Caution zone (dolphins): within 150 metres of a dolphin. - Vessels must not enter the 'no approach zone' and must not wait in front of the direction of travel when a calf is present.	Development of Marine Operation Framework#, Marine mammal and turtle monitoring and management plan# and marine mammal observation records.	Construction Operations Decommissioning
UWN-M06	Marine Fauna Observers (MFOs)	Minimise likelihood of marine fauna experiencing Temporary Threshold Shift or Permanent Threshold Shift.	Sufficient dedicated MFOs and vessels deployed to ensure visible coverage of the precaution zone based on the final round of modelling, as per the Construction Underwater Noise Management Framework. Any personnel that will be used as dedicated MFOs will be suitably qualified and experienced in accordance with EPBC Act PS 2.1.	Development of Marine mammal and turtle monitoring and management plan# and MMO Field Logs.	Construction
UWN-M15	Installation of export cable within southern right whale Biologically Important Area	Minimise likelihood of marine fauna experiencing Temporary Threshold Shift or Permanent Threshold Shift.	If reasonably practicable, the project will avoid installing the export cable within the SRW reproduction BIA during the months of May to September. If this is not reasonably practicable, and a SRW is detected by the vessel MFO, DP will be powered down to the lowest possible safe setting.	Development of Marine mammal and turtle monitoring and management plan#.	Construction

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			DP will not be powered up until there has been a 30 minute pre-start observation period and at least 30 minutes has elapsed since the most recent sighting of a SRW. This measure is designed to limit operations during periods when southern right whales are utilising the area.		
UWN-M17~~6~~	Vessel Underwater Noise Management	Alignment with EPBC Act Policy Statement 2.1 procedures for minimising the risk of acoustic injury and biologically significant disturbance to marine mammals.	Vessels operating dynamic positioning thrusters during construction will implement marine fauna mitigation procedures for vessels operating on dynamic positioning in Victorian waters. These will include: • Establishing precaution zones based on verified noise modelling and applicable marine mammals noise thresholds (EPBC Act PS 2.1 – B.4); • Marine Fauna Observers (EPBC Act PS 2.1 - A.2 and, during the Southern Right Whale reproduction season from May to September, B.1) • Undertaking marine fauna surveillance for 30 minutes prior to dynamic positioning startup (EPBC Act PS 2.1 - A.3.1); • If a marine mammal is detected during pre-start up surveillance, dynamic positioning must not commence until the animal has moved outside the precaution zone or 30 minutes has lapsed since the last sighting (EPBC Act PS2. - A.3.3); • Continuous daylight visual surveillance of relevant precaution zones by Marine Fauna Observers during dynamic positioning operations (EPBC Act PS 2.1 – A.3.4); • Operational procedures including delayed start-up, power down of dynamic positioning thrusters and re-start where marine mammals are detected within the relevant precaution zone (EPBC Act PS 2.1 – A.3.4 and A.3.5); • Application of night-time and low-visibility procedures where effective detection cannot be demonstrated (EPBC Act PS 2.1 – A.3.6, B.2 and B.5); and	Development of Marine mammal and turtle monitoring and management plan.	Construction and decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
			• Adaptive management procedures for vessel operations on dynamic positioning (EPBC Act PS2.1 – B.6) implemented if marine mammal behaviour, occurrence or abundance is different to what has been predicted for the noise management.		
VES-M07	Propeller guards	Minimise propeller impacts to Little Penguins and other marine fauna	Where reasonably practicable, installation and use of propeller guards on propeller operated vessels utilising the Port of Corner Inlet throughout all phases of the project.	Development of Marine Operation Framework# and. Installation records of propeller guards.	Construction Operations Decommissioning
VES-M08	Routine discharges & accidental discharges	Minimise reduction in water quality of sensitive receptors.	Routine discharges No routine discharges within 500 m of the boundaries of State or Australian marine parks, the southern right whale reproduction BIA / HCTS (between May and September), or if a marine mammal or turtle is within 500 metres of the vessel. Accidental Discharges In the event of an accidental discharge from a vessel, the discharge will be reported and monitored, including recording of any marine mammals and turtles that encounter the discharge.	Development of Marine Operation Framework#	Construction Operations Decommissioning
VES-M09	Provide an environmental induction to all crew member(s) including training for marine mammal observations whilst vessels are in transit.	Minimise the likelihood of vessel disturbance or strike to marine mammals and turtles.	Provide an environmental induction to all crew member(s) including training for marine mammal observations whilst vessels are in transit.	Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Operations Decommissioning

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
VES-M10	Restricted speed in southern right whale Biologically important Area	Minimise the likelihood and consequence of a vessel strike to Southern Right Whale.	Project vessels working on the transmission cable in the southern right whale Biologically Important Area (BIA) for reproduction will maintain a speed of less than 10 knots) during peak calving months of May to September.	Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Decommissioning
VES-M11	Adaptive management procedure for southern right whales and blue whales	Minimise the likelihood and consequence of a vessel strike to Southern Right Whales and Blue Whales.	Vessels will watch and act for the presence of southern right whales and blue whales during all project phases. If a southern right whale or blue whale is sighted: • Increased caution zone to 500 m • Reduced vessel speed to 5 knots within the caution zone.	Vessel crew Induction record and records of marine mammals observations. Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Operations

Measure ID	Title	Mitigation outcome	Description	Performance indicator	Stage
DEC-M01	Marine Decommissioning Management Plan	Manage impacts of Decommissioning activities.	A Marine Decommissioning Management Plan will be developed prior to decommissioning activities commencing to assess the impacts on the final agreed methodologies of removing offshore infrastructure. The plan will include: Details on marine infrastructure proposed to be removed or left in situ Assess potential impacts of decommissioning activities for the removal or retention of infrastructure on protected matters Specify how activities associated with decommissioning will be carried out in accordance with the project approval conditions Describe measures to be implemented to avoid or reduce impacts arising from the removal of infrastructure (if required) Consider management measures adopted in construction and apply where similar impacts could occur.	Development of Marine Decommissioning Management Plan.	Decommissioning
OFF-M23	Temporary Mooring Lines	Minimise the likelihood of entanglement	If temporary mooring lines are utilised, lines will be subject to regular monitoring and ensured that they will not remain slack. Entanglement incident responses will be proactively developed in the Vessel Operation Framework, to ensure a timely response.	Development of Marine mammal and turtle monitoring and management plan#	Construction Operations

Note - #: As relevant to project activities in Victorian coastal waters

Table -48 Project monitoring and contingency measures for the Victorian jurisdiction

Measure ID	Title	Description	Stage
AGM-M009	Landholder reporting mechanism	The Construction Environmental Management Plan and Property Management Plan should include a process for landholders to report any issues with construction activity or with the easement, particularly those that are unexpected or have not been anticipated.	Construction
AGM-M010	Agriculture and forestry operational monitoring and communications	The Operation Environmental Management Plan will include a systematic monitoring program that covers biosecurity, rehabilitation, soil erosion, and other issues identified in the CEMP and PMP. This program will also detail required responses if issues are detected during the annual monitoring. The OEMP will also include a communication plan to ensure there is a process for affected landholders to report any issues with operation activities.	Operation

Measure ID	Title	Description	Stage
AQM-M005	Weather monitoring and management for extreme conditions	Weather conditions will be monitored for extreme heat and/or wind events using systems such as the Bureau of Meteorology forecasts and works will be modified if conditions are likely to result in air quality impacts at sensitive receptors.	Construction and decommissioning
AQM-M006	Visual dust monitoring and management procedures	• Carry out regular site inspections to monitor compliance with management plan, record inspection results, and make an inspection log available to relevant regulatory authority when asked. • Increase the frequency of site inspections when activities are close to sensitive receptors, activities with a high potential to produce dust are being carried out, or during prolonged dry or windy conditions. • If dust is observed to be causing a hazard, review and make sure best practice dust management measures are appropriately implemented. If dust levels cannot be contained, works will be modified or stopped until the dust hazard is reduced to a manageable level.	Construction and decommissioning
AQM-M010	Performance monitoring and continuous improvement	Conduct ongoing performance evaluation through monitoring and continuous improvement to ensure ongoing compliance with all mitigation measures.	Construction, operation and decommissioning
EME-M002	Design verification methods in accordance with Energy Network Energy Network Association (ENA) Electric and Magnetic Fields Management Handbook	A design verification strategy will be employed to demonstrate compliance through measurement, that the onshore cables operate below the exposure reference levels set out in Australian Radiation Protection and Nuclear Safety Agency guidance. Verification methods shall include baseline survey prior to construction followed by measurement at the same locations under operational loads. In the event that levels exceed these thresholds, corrective measures will be applied as reasonably practicable to reduce exposure to within compliance levels.	Construction Operation
GWM-M004	Acid Sulfate Soil Management Plan Implementation	Monitoring and contingency measures documented in the Acid Sulfate Soil Management Plan (refer to GWM-M003) will be implemented.	Construction
HHM-M005	Monitoring and review of Historical Heritage mitigations	Conduct monthly reviews of compliance against HHM-M002, HHM-M004, and HHM-M006.	Construction
HHM-M006	Reinstatement of heritage values	In the event of accidental damage of a heritage feature (non-archaeological), a process will be implemented to assess and manage any accidental damage to potential heritage places in consultation with a suitably qualified heritage practitioner. Any reconstruction works should be undertaken under the direction of a suitably qualified heritage practitioner.	Construction

Measure ID	Title	Description	Stage
ONV-M008	Noise and vibration monitoring	Attended noise and vibration monitoring will be undertaken during construction at the start of any new activity with the potential to produce perceptible noise and vibration at sensitive receiver for the purposes of assessing the scope of the noise mitigation in use or following a complaint, as defined in the construction environment management plan: • The nearest noise sensitive residential property or properties impacted by out-of-hours works to confirm the effective implementation of noise mitigation measures (subject to landholder approval). • The nearest building or assets that are within derived set back distances for structural damage or in response to a complaint (subject to landholder approval). • Where an asset owner's utility standards are at risk of being exceeded. • It should be noted that monitoring should not be limited to verifying compliance with regulations and/or nominated criteria (if relevant); it should also be used pro-actively to validate the effectiveness of mitigation measures and to inform continual improvement. Where reasonably practicable, unattended noise monitors will be installed for the duration of the shore crossing drilling and offshore piling at the nearest affected residences (subject to landholder approval). The scope of the unattended monitoring will be determined by a suitably qualified acoustic consultant in consultation with the relevant authority for noise and vibration regulations at the time of works A response framework will be developed to manage potential impacts if nominated criteria are exceeded, including: • Actions taken to rectify the exceedance • Actions to minimise risk of reoccurrence • Name of person(s) responsible for undertaking the required actions. • The duration of the attended monitoring will be determined by a suitably qualified acoustic consultant in consultation with the relevant authority for noise and vibration regulations at the time of works.	Construction
ONV-M011	Decommissioning review and establishment of noise framework	A review of decommissioning activities will be conducted by the end of life of the project to plan decommissioning and establish the framework to manage noise impacts It is expected that the general principles provided in ONV-M010 and ONV-M008 will be adopted for the decommissioning stage.	Decommissioning

Measure ID	Title	Description	Stage
SUM-M015	Water quality monitoring	Implement a water quality monitoring program during the construction phase to monitor changes in water quality and ensure all discharges from the proposed works are in accordance with the legislative requirements. Where feasible, the baseline water quality assessments will be carried out at key project locations. This will include sampling upstream and downstream of an identified discharge point, and where feasible, real-time monitoring of turbidity in surface water runoff. The water quality monitoring program will be documented in the Construction Environmental Management Plan (CEMP), with more specific details contained in the surface water management plan (SWMP), including water quality parameters, locations (including at least one location between the shore crossing and the Corner Inlet Ramsar site) and frequency. The SWMP will also outline additional and/or improved measures that would be implemented should those controls fail or are not effective to eliminate or minimise risks of harm to surface water. The water quality monitoring program will be guided by multiple references and guidelines including the ERS, baseline water quality assessment results, and soil assessment reports conducted as part of geotechnical investigations. The water quality monitoring program will also be conducted in line with EPA Publication IWRG701: Sampling and analysis of waters, wastewaters, soils and wastes.	Construction
SUM-M016	Planned inspections	Implement a program of periodic inspections of the easements to ensure reinstated earthworks continue to maintain existing flow characteristics and water quality.	Operation
~~SUM-M017~~	~~Spill Response Monitoring~~	~~In the event of an unplanned hydrocarbon release, a monitoring and contingency plan shall be written to monitor and physical and biophysical impacts.~~	~~Construction~~ ~~Operation~~ ~~Decommissioning~~
GWM-M005	Onshore trench route inspection	The Onshore Operation Environmental Management Plan will include the following monitoring measure: In the event that thermal sand is used to backfill the onshore trench, the onshore trench route will be inspected following the first winter post-construction in order to check for areas of waterlogging that could be a result of groundwater discharge along preferential pathways. A suitably qualified person will determine whether any waterlogging identified is likely to be caused by trench (taking into account landscape location and pre-construction conditions), and if so, recommend contingency measures to address the impact.	Operation
MEMP-M03	Seabird Monitoring and Management Plan	Seabird Monitoring and Management Plan (SMMP), including monitoring and adaptive management arrangements, will be developed and implemented prior to offshore construction. The SMMP will outline approaches and objectives of monitoring for the project key impacts and risks and approaches to management in the event that results indicate that additional measures are needed. Offsets will be developed as necessary and informed by strategies and actions outlined in National Species Recovery Plans and other plans of management.	Construction Operations

Measure ID	Title	Description	Stage
MEMP-M05	Coastal Monitoring	Precautionary monitoring of coastal change based on satellite imagery such as Geoscience Australia's Digital Earth Australia database and/or the Victorian Coastal Monitoring Program (VCMP) database will commence 1 year prior to construction and will continue for the operational life of the Project to detect any changes to coastal landforms outside the range of natural variation (i.e. sediment accumulation and/or erosion). The Proponent will obtain and archive data from Digital Earth Australia and the Victorian Coastal Monitoring Program annually. Data will be analysed every three years for changes contrary to model predictions. As an adaptive management measure, should changes to the coastal system be identified (CPS-C01) as being due to the project (and not part of the natural variability or response to climate change), the Proponent will work with regulators to establish appropriate mitigation measures (or offsets).	Pre-construction, construction and operation
MEMP-M06	Monitoring of benthic habitats	A robust monitoring program will be designed to assess the impact of seabed disturbance on benthic habitats from project construction activities and to inform management decisions. The program will be carried out by suitably trained and competent personnel and be designed to enable detection of receptor recovery over time through the sampling of representative benthic habitats. The program will be informed by input from stakeholders, regulatory guidance and aligned with reputable, published monitoring standards.	Construction Operation
MEMP-M07	Monitoring of fish assemblage and key species	A robust fish monitoring program will be implemented during project construction and operation to assess environmental performance and inform management decisions. The program will enable comparison of data with spatial/temporal references, including baseline data collected during the Marine Ecology Survey Program. Adaptive management An adaptive management process will be adopted to respond to monitoring results where necessary. This process will consider the project activities and other relevant data collected by the project at the time. The management process will implement appropriate actions where required, considering the spatial and temporal nature of the monitoring results.	Construction Operation
MEMP-M09	Cable Burial survey and monitoring	Post-lay survey and ongoing monitoring of cable position and depth below the seabed. A Remedial Burial Strategy (RBS) will be implemented when the inter-array or offshore export cables are thought to be inadequately buried, with the intent to ensure the cable is reburied to the required depth standard. The RBS will comprise an initial DoB survey and analysis of seabed conditions, sediment types and other factors including environmental sensitivities, followed by a risk assessment to confirm reburial options and, where necessary, reburial to defined MDoL using a suitable remedial burial method (defined in the RBS).	Construction Operation
BTM-M007	Stakeholder Engagement Plan – boat ramps	In order to gauge how the project is affecting the preferences of boat users and recreational fishers at boat ramps, the stakeholder engagement will provide evidence for potential infrastructure improvements or demand management measures.	Construction and operation

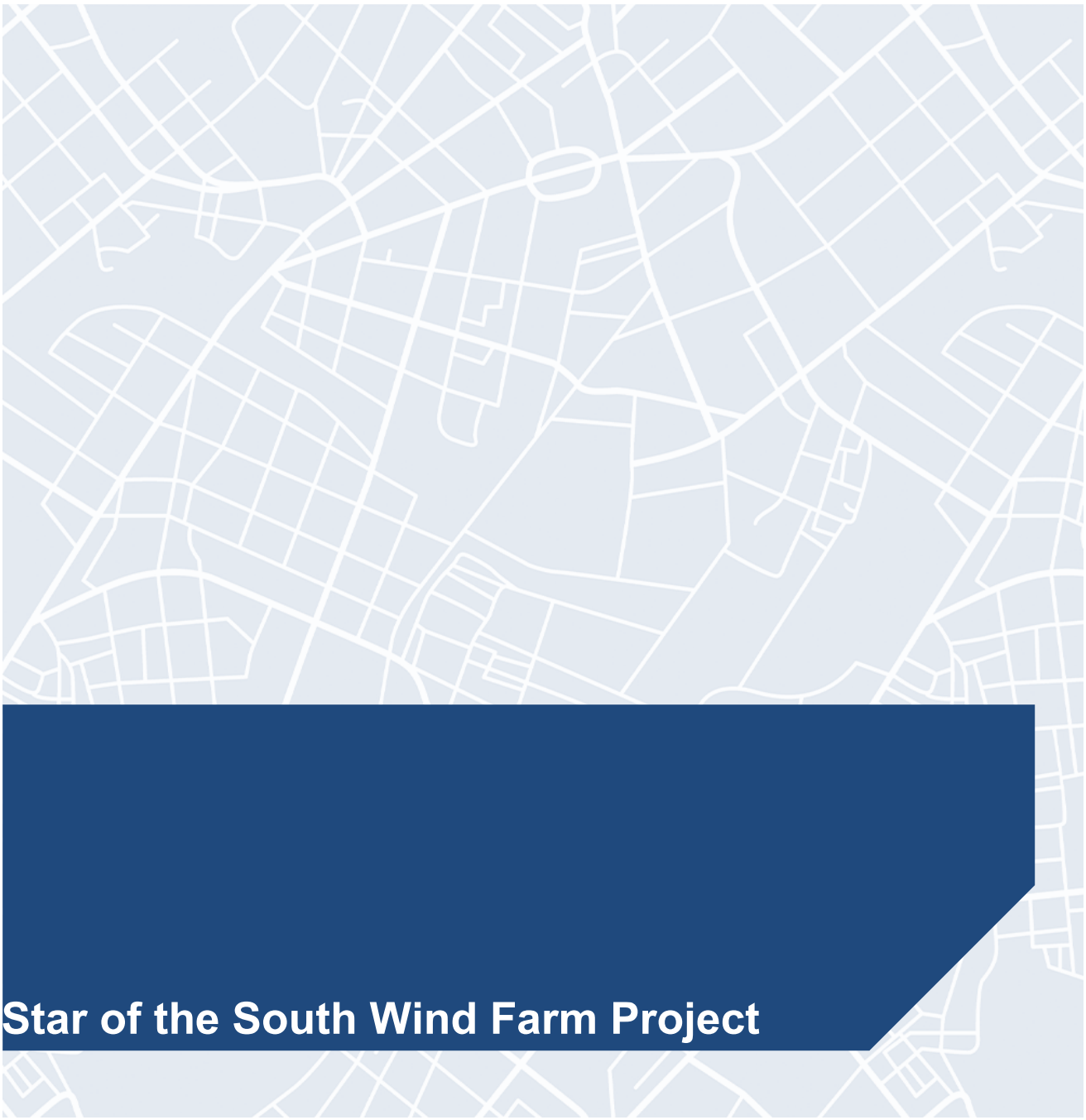
Measure ID	Title	Description	Stage
BTM-M008	Workforce Housing Monitor	Monitor the number and share of project workers who live in the region or who move to the region. Identify the type of accommodation used by each worker who moves into the region. This data can be used to monitor and adjust the Workforce Accommodation Strategy, if required.	Construction and operation
BTM-M009	Accommodation Surveys	Monitor visitation to the local study area through accommodation surveys in order to understand impacts on tourism businesses. This could include asking a range of accommodation providers to continually report on their occupancy in order to gauge the ongoing state of the industry and the availability of short term accommodation for the project. This will be necessary in monitoring the Workforce Accommodation Strategy.	Construction and operation
SCH-M006	Unexpected finds protocols	Develop and maintain an unexpected finds protocol for the unexpected discovery of Aboriginal cultural heritage material. The unexpected finds protocol will lay out the process by which any Aboriginal archaeological material that is found unexpectedly (such as within geotechnical samples or through seabed inspections) is managed. The protocol includes the nomination of a suitably qualified and experienced archaeologist to whom any finds are reported. The archaeologist will then undertake an assessment of the finds to establish the appropriate pathways for reporting, recording, and assessment of the material, and establish whether additional further actions such as establishment of exclusion zones, further intervention or investigative work is required. The unexpected finds protocols will be outlined in the Cultural Heritage Management Plan for State Waters (SCH-M007) and the UCH Management Plan for Commonwealth Waters.	Prepared and Agreed Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning.
SCH-M007	The preparation of a Cultural Heritage Management Plan with contingency protocols pertaining to Submerged Aboriginal Cultural Heritage in State Waters	Prepare, gain approval, and implement conditions of a Cultural Heritage Management Plan (CHMP) in accordance with the Aboriginal Heritage Act 2006 (Vic). Comply with contingency protocols outlined in the CHMP. The CHMP will include specific contingency protocols pertaining to Submerged Aboriginal Cultural Heritage located within State Waters (also see AHM-01; AHM-07).	Prepared and Approved Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning.

Appendix I Inquiry recommended draft Incorporated Document

The Inquiry's recommended changes to the draft Incorporated Document are based on the Proponent's Version 2 draft Incorporated Document (Document 104) and are shown as:

Tracked Added

~~Tracked Deleted~~



Star of the South Wind Farm Project

WELLINGTON PLANNING SCHEME
DRAFT Incorporated Document

This document is an Incorporated Document in the Wellington Planning Scheme pursuant to section 6(2)(j) of the *Planning and Environment Act 1987*

1.0 INTRODUCTION

1.1 This document is an Incorporated Document in the Wellington Planning Scheme (**Planning Scheme**) pursuant to section 6(2)(j) of the *Planning and Environment Act 1987*.

1.2 This Incorporated Document authorises the development and use of land that forms part of the Star of the South Wind Farm Project (the **Project**) by providing a specific control for the purpose of clause 45.12 of the Planning Scheme.

1.3 The control in Clause 5.0 prevails over any contrary or inconsistent provision in the Planning Scheme.

1.4 The control in this Incorporated Document does not apply to the use and development of the Project Land (as defined in Clause 3.1) for purposes other than the Project. Use and development of the Project Land for purposes other than the Project must be in accordance with the provisions of the Planning Scheme.

1.5 Land uses in italics have the same meaning as in clause 73.03 (Land Use Terms) of the Planning Scheme.

2.0 PURPOSE

2.1 The purpose of this Incorporated Document is to permit and facilitate the use and development of the Project Land (as defined in Clause 3.1) for the purposes of or related to the Project in accordance with Clauses 5.0 and 6.0.

3.0 LAND TO WHICH THIS INCORPORATED DOCUMENT APPLIES

3.1 The control in this Incorporated Document applies to the land shown as Specific Controls Overlay – Schedule 3 (SCO3) on the Planning Scheme maps forming part of the Planning Scheme (**Project Land**). The Project Land is shown in Figure 1 and comprises the:

a) 'Primary alignment' – land which has been assessed and selected as the Project's transmission system alignment (shown in Figure 1 as solid grey fill); and

b) 'Additional land' – viable alignment options ~~and land within the VicGrid connection hub study area (also referred to as 'proposed Giffard terminal station area')~~ to connect the Primary alignment to the Gippsland offshore wind transmission line shared network (shown in Figure 1 as solid black fill). Integration of Additional land into the Primary alignment will be facilitated through the secondary approval process outlined in Section 6.0.

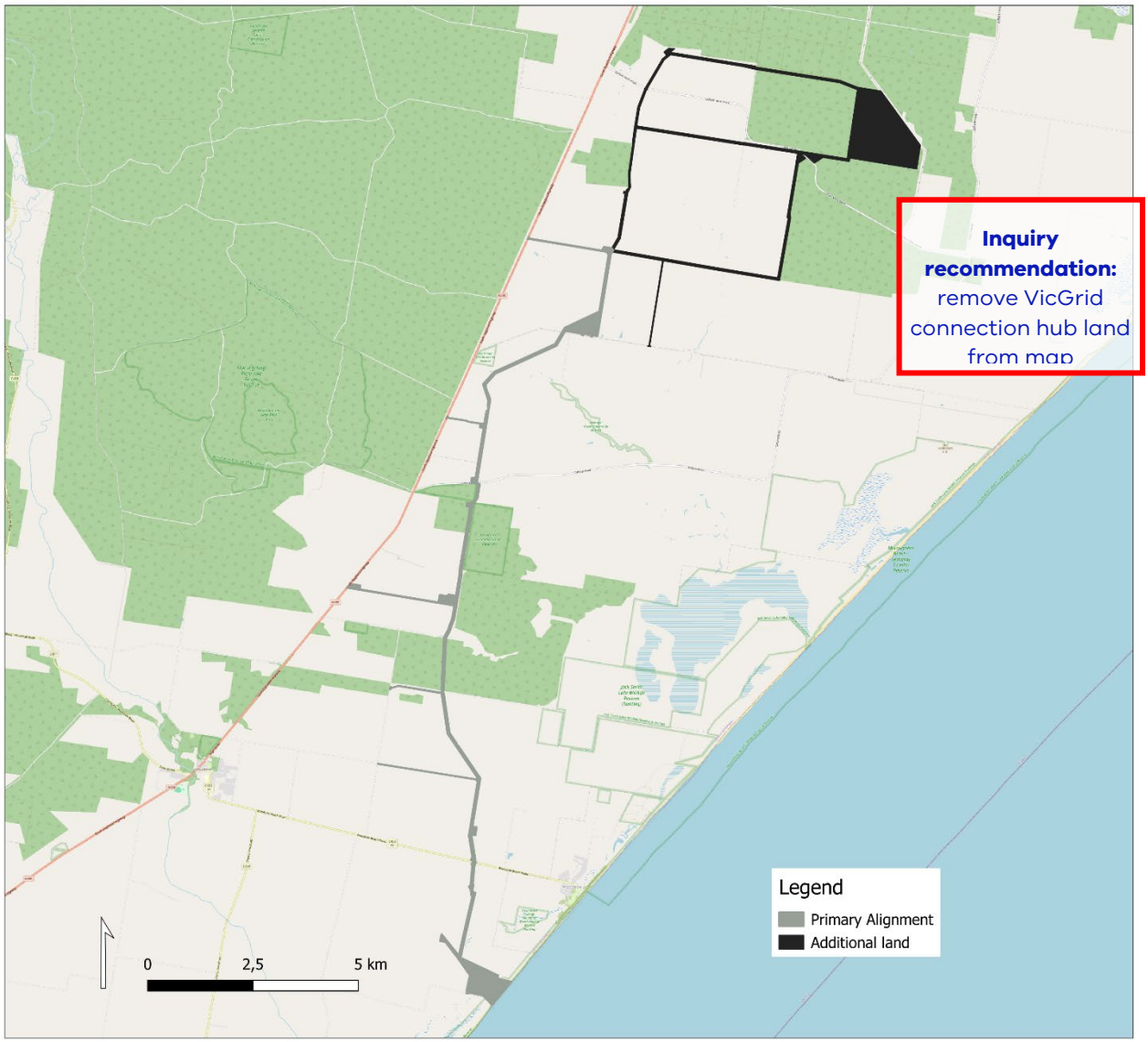


Figure 3 – Map of land to which this Incorporated Document applies

4.0 EXPIRY OF THIS SPECIFIC CONTROL

4.1 The control in this Incorporated Document expires if any of the following circumstances applies:

a) The development allowed by the control, including preparatory building and works, is not started by [INSERT] [Proposed to be four years of the gazettal date of Amendment C129well to this scheme].
b) The development (excluding decommissioning, remediation and any other ongoing development activity required by a mitigation measure in the Victorian Environmental Management Framework approved under this control) allowed by the control is not completed by [INSERT] [Proposed to be 10 years of the gazettal date of Amendment C129well to this scheme].
c) The use allowed by the control is not started by [INSERT] [Proposed to be 10 years of the gazettal date of Amendment C129well to this scheme].

4.2 The Minister for Planning may extend these periods if a request is made in writing before the expiry date or within six months afterwards.

4.3 Upon expiry of the specific control, the Project Land may be used and developed only in accordance with the provisions of the Planning Scheme in operation at that time.

4.4 The control in this Incorporated Document ceases to apply to any Project Land that is not included in the endorsed Alignment Plan, 12 months after registration of all required easements on property titles where the Project is located, unless otherwise agreed in writing by the Minister for Planning.

5.0 CONTROL

5.1 Despite any provision to the contrary or any inconsistent provision in the Planning Scheme, a planning permit is not required for, and no provision of the Planning Scheme operates to prohibit, restrict or regulate, the use and development of the Project Land for the purposes of, or relating to, the Project.

5.2 The Project includes, but is not limited to the following:

a) Use and development for *Utility Installations* and associated buildings and works consisting of the:

i) Onshore electricity transmission system consisting of underground cables, telecommunications fibre and joints, extending between the shore crossing and the VicGrid connection hub property boundary; and

ii) Shore crossing infrastructure comprising offshore export cables carrying electricity from the offshore wind farm to onshore electricity transmission infrastructure, including onshore electricity transmission cables, transition joints and communication cables.

b) Ancillary activities including, but not limited to:

i) Use and development of construction compounds and laydown areas for construction purposes, including for materials storage, duct handling and assembly, drilling operations and batching plants;

ii) Earthworks, including drilling and excavation, spoil stockpiling and removal, development of trenches, ducts and cable joint pits and temporary access tracks into construction compounds;

iii) Use and development of temporary administration and amenities buildings;

iv) Relocation, modification, upgrade or installation of services and utilities, including drainage infrastructure, telecommunications infrastructure and gas pipelines;

v) Construction or carrying out works to create or alter roads, create or alter access to roads in a Transport Zone, bridges, ramps, fences, access tracks, temporary barriers and site security, noise attenuation walls, retaining walls, car parking areas, bunds, mounds, landscaping, piles, foundations, drainage infrastructure, water treatment and storage, bores and flood mitigation;

vi) Construction and display of signs related to the Project;

vii) Construction or carrying out works to excavate land and salvage artefacts;

viii) Removal, destruction and lopping of trees and vegetation, including native vegetation and dead vegetation;

ix) Demolition, removal and/ or relocation of buildings and works and rehabilitation of areas disturbed by construction activity;

x) Subdivision and consolidation of land and creation and removal of easements; and

xi) Restoration and reinstatement works.

c) Any use or development that the Minister for Planning confirms in writing is for the purposes of the Project.

6.0 CONDITIONS

6.1 The use and development of the Project Land for the purposes of, or relating to, the Project must be undertaken in accordance with the following conditions.

6.2 The Alignment Plan and Victorian Environmental Management Framework under this Incorporated Document may be amended from time to time to the satisfaction of the Minister for Planning.

6.3 In deciding whether to endorse or amend the Alignment Plan or Victorian Environmental Management Framework, the Minister may seek the views of any other relevant authority.

6.4 An application for an amendment to the Alignment Plan or Victorian Environmental Management Framework must be accompanied by:

a) A track changes version with a schedule explaining the proposed amendment;

b) A description of the form and extent of any consultation undertaken concerning the proposed amendment with relevant councils, relevant government agencies, affected landowners and other stakeholders including community groups and business associations; and

c) Any written comments from relevant councils, relevant government agencies, affected landowners and other stakeholders including community groups and business associations.

6.5 The Alignment Plan and Victorian Environmental Management Framework may be prepared and endorsed for separate components or stages of the Project, but each Alignment Plan or Victorian Environmental Management Framework relevant to a component or stage must be approved prior to the commencement of development for that component or stage.

6.6 The use and development of the Project Land for the purposes of, or relating to, the Project must be undertaken generally in accordance with an endorsed Alignment Plan and Victorian Environmental Management Framework and any other documents approved under Clause 6.0 of this Incorporated Document.

Alignment Plans

6.7 Prior to the commencement of development (excluding preparatory buildings and works under Clause 6.14), Alignment Plans must be submitted to the

Minister for Planning for endorsement, unless otherwise agreed in writing by the Minister for Planning. The Alignment Plans:

a) Must be generally in accordance with the Map Book provided as Attachment I of the Star of the South Environment Effects Statement;

b) Must include details of Project infrastructure as outlined within Clause 5.0; and

c) Must be drawn to scale and include the following:

i) Route of the onshore electricity transmission system and shore crossing infrastructure and location of construction laydown areas and access tracks;

ii) Layout and typical elevations of any above ground Project infrastructure including construction laydown areas (with dimensions where appropriate); and

iii) Details of materials and finishes for any above ground Project infrastructure including construction laydown areas.

~~6.8 If the Alignment Plans show Project infrastructure within the Connection hub study area, the Alignment Plans submitted to the Minister must include a report setting out the reasons for the proposed location of Project infrastructure within the Connection hub study area. The report must demonstrate that the location of infrastructure in the Connection hub study area applies the three step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Energy, Environment and Climate Action (DEECA), v1.1, August 2025) (Guidelines).~~

Victorian Environmental Management Framework

6.9 Prior to the commencement of the development (excluding preparatory buildings and works under Clause 6.14), the Victorian Environmental Management Framework must be submitted to and approved by the Minister for Planning, unless otherwise agreed in writing by the Minister for Planning.

6.10 The Victorian Environmental Management Framework must include mitigation measures generally in accordance with the Minister's Assessment under the *Environment Effects Act 1978* dated [day month 2026] applicable to the design, construction and operation of the Project, unless otherwise approved by the Minister for Planning.

6.11 The Victorian Environmental Management Framework must include the processes for monitoring, reporting, auditing and evaluating performance and environmental outcomes and timing for the development of:

a) Construction Environmental Management Plan(s);

b) Operation Environmental Management Plan(s);

c) Decommissioning Environmental Management Plan(s); and

d) Any other plans as required by the mitigation measures or the Victorian Environmental Management Framework.

Native Vegetation

6.12 Prior to the removal of native vegetation:

a) Information about the native vegetation, in accordance with the relevant requirements of the Guidelines, must be prepared to the satisfaction of

the Secretary to DEECA (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*). The native vegetation removal extent must be generally in accordance with the Minister's Assessment under the *Environment Effects Act 1978*, but may be altered due to micro-siting of infrastructure and/or as needed to comply with any other requirement of this Incorporated Document and Victorian Environmental Management Framework, to the satisfaction of the Secretary to DEECA;

b) The biodiversity impacts from the removal of that native vegetation must be offset in accordance with the Guidelines to the satisfaction of the Secretary to DEECA; and

c) Evidence that the required offset(s) has been secured must be provided to the satisfaction of the Secretary to DEECA.

6.13 The Secretary to DEECA may vary the timing for the provision of offsets or allow offsets to be secured in stages. The offset/s secured for the project may be reconciled upon completion of the project.

Preparatory Buildings and Works

6.14 The following buildings and works (excluding the removal of native vegetation where but for this Incorporated Document, a planning permit would not be required under the provisions of the Planning Scheme) may be undertaken for the Project, or a component or stage of the Project, before the Alignment Plans are endorsed by the Minister for Planning and documents required by Clause 6.12 of this Incorporated Document are approved by the Secretary to DEECA:

a) Investigating, testing and preparatory works to determine the suitability of land, including intrusive surveys, bores, and sampling, and property condition surveys;

b) Creation, development and use of access points, access tracks and working platforms;

c) Site establishment works including temporary site fencing and hoarding, site offices, and hardstand and laydown areas;

d) Construction, protection, modification, removal or relocation of Minor Utility Installations, traffic devices, overhead powerlines and associated infrastructure;

e) Establishment of environment and traffic controls, including designation of 'no-go' zones;

f) Establishment of temporary car parking;

g) Demolition to the minimum extent necessary to enable preparatory works; and

h) Salvage and relocation of Aboriginal cultural heritage material and other management actions required to be undertaken in compliance with a Cultural Heritage Management Plan approved under the *Aboriginal Heritage Act 2006* or otherwise in compliance with that Act.

Availability of Approved Plans and Documents

6.15 A current version of the endorsed Alignment Plans must be made available on a clearly identifiable Project website from the date of approval and must remain available on the website for at least 2 years after commencement of operation.

END OF DOCUMENT