REFERRAL OF A PROJECT FOR A DECISION ON THE NEED FOR ASSESSMENT UNDER THE *ENVIRONMENT EFFECTS ACT 1978*

REFERRAL FORM

The *Environment Effects Act 1978* provides that where proposed works may have a significant effect on the environment, either a proponent or a decision-maker may refer these works (or project) to the Minister for Planning for advice as to whether an Environment Effects Statement (EES) is required.

This Referral Form is designed to assist in the provision of relevant information in accordance with the *Ministerial Guidelines for assessment of environmental effects under the Environment Effects Act 1978* (Eighth Edition, 2023). Where a decision-maker is referring a project, they should complete a Referral Form to the best of their ability, recognising that further information may need to be obtained from the proponent.

It will generally be useful for a proponent to discuss the preparation of a Referral with the Impact Assessment Unit (IAU) at the Department of Transport and Planning (DTP) before submitting the Referral.

If a proponent believes that effective measures to address environmental risks are available, sufficient information could be provided in the Referral to substantiate this view. In contrast, if a proponent considers that further detailed environmental studies will be needed as part of project investigations, a more general description of potential effects and possible mitigation measures in the Referral may suffice.

In completing a Referral Form, the following should occur:

- Mark relevant boxes by changing the font colour of the 'cross' to black and provide additional information and explanation where requested.
- As a minimum, a brief response should be provided for each item in the Referral Form, with a more detailed response provided where the item is of particular relevance. Cross-references to sections or pages in supporting documents should also be provided. Information need only be provided once in the Referral Form, although relevant cross-referencing should be included.
- Responses should honestly reflect the potential for adverse environmental effects. A Referral will only be accepted for processing once IAU is satisfied that it has been completed appropriately.
- Potentially significant effects should be described in sufficient detail for a reasonable conclusion to be drawn on whether the project could pose a significant risk to environmental assets. Responses should include:
    - a brief description of potential changes or risks to environmental assets resulting from the project;
    - available information on the likelihood and significance of such changes;
    - the sources and accuracy of this information, and associated uncertainties.
- Any attachments, maps and supporting reports should be provided in a secure folder with the Referral Form.
- A USB copy of all documents will be needed, especially if the size of electronic documents may cause email difficulties. **Individual documents should not exceed 10MB as they will be published on the Department's website.**

- A completed form would normally be between 15 and 30 pages in length. Responses should not be constrained by the size of the text boxes provided. Text boxes should be extended to allow for an appropriate level of detail.
- The form should be completed in MS Word and not handwritten.

The party referring a project should submit a covering letter to the Minister for Planning together with a completed Referral Form, attaching supporting reports and other information that may be relevant. This should be sent to:

Postal address

Minister for Planning
PO Box 500
EAST MELBOURNE VIC 8002

Couriers

Minister for Planning
Level 16, 8 Nicholson Street
EAST MELBOURNE VIC 3002

In addition to the submission of the hardcopy to the Minister, separate submission of an electronic copy of the Referral via email to ees.referrals@delwp.vic.gov.au is required. This will assist the timely processing of a referral.

PART 1 PROPONENT DETAILS, PROJECT DESCRIPTION & LOCATION

1. Information on proponent and person making Referral

Name of Proponent:	Iberdrola Australia OW 2 Pty Limited **(Iberdrola Australia**)
Authorised person for proponent: **Position:** **Postal address:** **Email address:** **Phone number:** **Facsimile number:**	Daniel Machado Senior Manager Environment – Offshore Wind Level 40, North Tower 80 Collins Street, Melbourne VIC 3000 Daniel.machado@iberdrola.com.au +61 448 211 661 N/A
Person who prepared Referral: **Position:** **Organisation:** **Postal address:** **Email address:** **Phone number:** **Facsimile number:**	Jenny Luk Partner Environmental Resources Management Australia Pty Ltd Level 8, 501 Swanston Street, Melbourne, Victoria, 3000 Jenny.luk@erm.com +613 9696 8011 +613 9696 8022
Available industry & environmental expertise: (areas of 'in-house' expertise & consultancy firms engaged for project)	**Iberdrola Australia** Iberdrola Australia is part of the Iberdrola Group and is ultimately owned by Iberdrola, S.A. With more than 120 years of history, Iberdrola is a global energy leader, one of the world's leading producers of wind power, and an operator of large-scale transmission and distribution assets in three continents, making it one of the world's biggest electricity utilities by market capitalisation. The Iberdrola Group is a pioneer in developing the offshore wind industry across many markets, including in the US, the UK and Europe, with 2.3 GW in operation at the end of 2024 and plans to increase offshore wind installed capacity to 6.5 GW by 2030. Iberdrola Australia has a 20-year history of pioneering the renewable energy transition in Australia. Its strategy is to combine a large and growing fleet of wind and solar renewable energy generation with a portfolio of fast start firming assets, enabling the company to provide customers with electricity supplies that are at reliable, affordable, and green. With over 2 GW of capacity in operation or construction providing renewable energy to over 200 commercial and industrial customers, Iberdrola Australia is one of the largest renewable utilities in the country. **Consultants** Environmental Resources Management Australia Pty Ltd (**ERM**) has been engaged by Iberdrola Australia as lead

	consultant to undertake environmental studies and assessments for the purpose of obtaining primary and secondary approvals for the Project. ERM is a leading provider of environmental, health and safety, risk, and social consulting services. ERM delivers innovative solutions for their clients, helping them manage their challenges and better understand their impacts on the world around them and how to best avoid, minimise and mitigate impacts so projects are developed in an environmental and socially responsible manner. ERM has over 8000 employees working across 40 offices globally, including over 600 in Australia. ERM has a long standing and proven history of successful delivery in Australia and globally of major infrastructure projects, including across the renewable energy and offshore oil and gas sectors. ERM has delivered over 1500 renewable energy projects across 100 countries since 2010, including offshore wind in Europe and the Asia Pacific regions. ERM's experience relevant to offshore wind includes environmental due diligence and feasibility studies, site selection, environmental and social impact assessments, and environmental scoping, environmental approvals and permitting, and marine and terrestrial studies. To complement ERM's expertise, the following suitably qualified consultants have been engaged to support this referral: • Preliminary landscape and visual impact appraisal: Hansen Partnership.

2. Project – brief outline

Project title: Aurora Green Offshore Wind Project
Project location: (describe location with AMG coordinates and attach A4/A3 map(s) showing project site or investigation area, as well as its regional and local context) The Aurora Green Offshore Wind Project (**the Project**) will comprise onshore and offshore components within the Gippsland region, Victoria. Project components would be located within the following broad investigation areas for locating infrastructure (shown in Figure 1-1 of Attachment 1): • **Offshore Wind Farm Feasibility Licence Area** – the area covered by Feasibility Licence FL-012 in the Gippsland Declared Area OEI-01- 2022, which is located in Commonwealth waters and does not form part of the Referral Area. • **Export Cable Corridor Investigation Area (offshore)** – the area of the offshore marine environment, within which the offshore portion of the Export Cable Corridor would be defined. This area includes both north-east and south-west corridors and shore crossing options, with the preferred option and area of interest to be defined and narrowed down as the Project progresses. The area is located in both Victorian and Commonwealth waters; the Commonwealth waters component does not form part of the Referral Area. • **Export Cable Corridor Investigation Area (onshore)** – the area within which the onshore portion of the Export Cable Corridor would be defined. This area generally aligns with a portion of the Gippsland Shoreline Renewable Energy Zone (**REZ**). The preferred area of interest will be defined and narrowed down as the Project progresses.

Offshore components of the Project are located in marine environments in both Victorian and Commonwealth jurisdictions. This referral relates to those Project components located within Victoria only (i.e., onshore and in Victorian coastal waters).

Refer to **Figure 1-1** of **Attachment 1** for the Referral Area. The Project coordinates are provided in **Attachment 2** in GDA94.

Short project description (few sentences)**:**

Iberdrola Australia proposes to construct and operate the Aurora Green Offshore Wind Project, a renewable energy development to be located off the Gippsland coast of Victoria, Australia.

Aurora Green is a 3 GW offshore wind project being developed by Iberdrola Australia in Gippsland, located 25+ kms from the coast. The Project is proposed offshore from Seaspray/Honeysuckles and Woodside Beach within the Commonwealth's offshore wind Gippsland Declared Area OEI-01-2022.

The electricity generated by up to 150 wind turbines would be transmitted to a connection point onshore, via a transmission system of cables and substations, and would connect into the National Electricity Market to power homes and businesses. With a proposed operational life of 30-40 years, the Project would be developed in stages to align with the development of the industry and supporting infrastructure.

The wind turbines, inter array cables and offshore substation(s) would be located in Commonwealth waters, with the subsea export cable located in both Commonwealth waters and Victorian coastal waters. Iberdrola Australia would work with the party ultimately chosen by VicGrid to build, own and operate the transmission infrastructure in Gippsland that will facilitate the connection of offshore wind developments in the region.

The final design and layouts for both the offshore and onshore infrastructure would be determined as the Project develops, informed by ongoing environmental and engineering investigations as well as stakeholder and community consultation.

3. Project description

Aim/objectives of the project (what is its purpose / intended to achieve?):

Once complete, it is expected that the delivery of the Project by Iberdrola Australia would provide the following benefits to the State of Victoria and Australia:

- Up to 3 GW of offshore wind power generating capacity
- Clean energy to power up to 2.25 million households
- 600 long-lasting, skilled jobs during operation
- 1800+ jobs during construction
- $8 billion boost to the Victorian economy
- Grow and support local talent through apprenticeships, scholarships and research programs.

Background/rationale of project (describe the context / basis for the proposal, eg. for siting):

Iberdrola Australia has been assessing the potential for development of offshore wind projects in Australia since 2021. The Aurora Green Offshore Wind Project was put forward for development based on a comprehensive and robust analysis of options.

Following a competitive process by the Commonwealth Government, on 15 July 2024 Iberdrola Australia was granted Feasibility Licence FL-012 for the Aurora Green Offshore Wind Project in the Declared Area OEI-01-2022 by the Commonwealth Minister for Climate Change and Energy under section 33 of the *Offshore Electricity Infrastructure Act 2021* (**OEI Act**). This licence allows Iberdrola Australia to assess the feasibility of the proposed offshore wind project and is valid for up to seven years.

Main components of the project (nature, siting & approx. dimensions; attach A4/A3 plan(s) of site layout if available):

The following offshore and onshore Project components would be located within the broad investigation area shown in **Figure 1-1** of **Attachment 1:**

- **Offshore wind farm (OWF)**, in Commonwealth waters, located between approximately 25 km and 50 km offshore from the towns of Woodside Beach and Seaspray, covering an area of 700 km^2, in water depths ranging from approximately 40 m to 60 m. The OWF would comprise up to 150 wind turbines depending on the final design. It also includes inter array cables (**IAC**) and offshore substation(s).
- **Export cable corridor (ECC)**, to transmit the electricity and data from the turbines to the onshore connection point, encompassing export cables spanning across both Commonwealth and Victorian coastal waters and on land. The cables would make landfall at a shore crossing location (at either Reeves Beach or McGaurans Beach), with the offshore and onshore cable portions connected via underground cable transition joint bays (**TJB**) to be located within approximately 500 m of the shoreline.
- **Onshore connection point**, comprising an onshore substation to be located within the VicGrid Connection Hub located in the Gippsland Shoreline REZ.
- **Operations and maintenance (O&M) facility**, to support the ongoing operation and maintenance of the project. The O&M facility shall be located at an existing nearby port. The O&M facility is not part of the Referral Area. Any approvals associated with port upgrades would be done by others.

The delivery of the VicGrid Connection Hub does not form part of this Project. Iberdrola Australia would work with the party ultimately chosen by VicGrid to build, own and operate the transmission infrastructure in Gippsland that will facilitate the connection of offshore wind developments in the region.

However, this Project is being developed to consider and align with the Victorian Transmission Plan (**VTP**) and VicGrid's Gippsland Offshore Wind Transmission Project. This includes the Gippsland Shoreline REZ, as well as the proposed Giffard Terminal Station area and the recently published offshore wind shoreline crossing areas, released by VicGrid in late 2025, as shown in **Figure 1-7** of **Attachment 1**.

Ancillary components of the project (e.g. upgraded access roads, new high-pressure gas pipeline; off-site resource processing):

The following ancillary components are associated with the Project:

- **Operations and Maintenance facility,** to support ongoing operations, the Project would make use of an O&M facility to be located at a nearby port location. It is anticipated that this facility would be established (including separate assessments and approvals) by the port operator and may service one or multiple users within the port precinct. As such the facility it is not included in this Referral.
- **Temporary ancillary infrastructure,** to support the construction phase of the Project. This would likely include temporary construction laydown areas, batching plants, access roads, site and personnel facilities, as well as site offices and storage facilities. This includes the use of a construction port(s) where marine operations would be controlled from, such as marshalling, pre-assembly and storage of components during the construction phase. Minor upgrade works may be required to facilitate the anticipated construction traffic. Potential utilities services relocations and/or upgrade works may be required to facilitate the onshore infrastructure. Any associated approvals would be delivered by others.

Key construction activities:

Key construction activities include:

- Offshore Wind Farm

- Survey, site clearance and installation of ancillary components (e.g., navigational aids, monitoring equipment) and seabed preparation;
- Installation of offshore foundations and scour protection (as required);
- Installation of turbine and offshore substation structures on foundations;
- Laying and burying/protection of inter array cables; and
- Testing and commissioning of the offshore wind farm infrastructure.

- Export Cable Corridor (offshore)
  - Surveys and site clearance;
  - Preparation of the seabed (including some limited levelling as necessary), within a defined corridor;
  - Installation and possible burying of the cables, subject to ground conditions; and
  - Laying of cable protection (which may include concrete mattressing, rock placement, grout bags, rock filled gabion bags, etc), as required.
- Construction of shore crossing, transmission corridor infrastructure, including the following activities, as required: crossing site excavation, drilling and cable installation, trenching, TJB installation, onshore cable systems and electrical equipment installation;
- Export Cable Corridor (onshore)
  - Preparation of a cable trench within a defined corridor;
    - Surveys and site clearance;
    - Installation of the cables; and
    - Backfilling and laying of cable protection, as required.
  - Establishment of onshore construction sites and upgrades to existing roads, as required, as well as creation of site access and laydown areas;
  - Clearing and preparation of the selected transmission corridor, onshore substation and connection point area (as required);
  - Electrical connection of cables and final system commissioning; and
  - Removal of construction equipment and facilities, and site rehabilitation.
- Onshore Connection Point
  - Construction of the onshore substation and connection point infrastructure;
  - Electrical connection final system commissioning; and
  - Removal of construction equipment and facilities, and site rehabilitation.

Temporary Footprint (during Project construction stage)

Following the siting of infrastructure within the broader Referral Area, the temporary construction footprint would be much smaller (than the investigation area) and would include the area required for all short-term activities to support the construction of the project and installation of the export cables. This includes zones required for cable laying, vessel manoeuvring, landfall works, temporary access routes, construction support areas, safety buffers, and environmental protection measures. The temporary construction footprint would be larger than the permanent infrastructure footprint (i.e., once the construction process is complete, all temporary infrastructure would be removed, and the temporary footprint rehabilitated). The ECC temporary construction footprint width at this early development stage is anticipated to be up to approximately 200 m.

Key operational activities:

Key operations activities during the lifetime of the Project may include:

Offshore Wind Farm

- Inspections and predictive maintenance of turbines, substations, and foundations. This may include:
    - Lubrication and replacement of mechanical components
    - Ongoing electrical system testing
    - Corrosion protection system checks (e.g., cathodic protection, coatings)
    - Cleaning and maintenance of access platforms and safety systems
    - Wind turbine repairs and foundation remedial works, as required.

Export Cable Corridor (offshore)

- Undertaking of seabed surveys to:
    - Detect and rectify cable exposure or movement
    - Monitor for damage from environmental factors or third-party interference
    - Undertake remedial burial or rock placement if cables become exposed.

Export Cable Corridor (onshore) and Onshore Connection Point

- Inspection and maintenance of onshore substation, overhead or underground lines
- Vegetation management along transmission corridors
- Equipment testing and maintenance.

Permanent Footprint (during Project operations stage)

The permanent infrastructure footprint would include the area of seabed and land permanently occupied by the installed infrastructure, including turbines (and foundations), inter array cables, substations, export cables, TJB(s) and associated infrastructure and easement(s). The permanent infrastructure footprint would be much smaller than the temporary construction footprint. At this early development stage, the permanent infrastructure footprint for the ECC is anticipated to be less than 100 m wide.

Key decommissioning activities (if applicable):

The proposed operational life of the Project is 30 - 40 years, after which key infrastructure is proposed to be decommissioned. In the event that the operational life is proposed to be extended, the process of re-powering the Project would be subject to any relevant approval processes at the time and the upgrading of project infrastructure, facilities and equipment, as required.

Requirements for decommissioning would be established through the approvals phase for the Project. The principal decommissioning approach for the Project includes the removal of infrastructure above seabed, or ground level, in accordance with the Commonwealth and Victorian regulatory requirements, following cessation of operations. Some infrastructure may be left in-situ, if deemed safe and to be less impactful than its removal. There is also an option to repurpose or reuse the existing infrastructure. This would be approached in consultation with community and the relevant regulatory agencies.

It is anticipated that principal decommissioning activities would include:

- Consultation with key stakeholders and landholders;
- Removal of infrastructure as required;
- Reinstatement/rehabilitation activities; and
- Monitoring, as required.

Is the project an element or stage in a larger project?

☒ No ☐ Yes If yes, please describe: the overall project strategy for delivery of all stages and components; the concept design for the overall project; and the intended scheduling of the design and development of project stages).

The Project defined here is not part of a staged development. While the Project is proposed to be developed in phases (nominally 3 phases), all phases are included in the proposed action that is the subject of this referral.

Is the project related to any other past, current or mooted proposals in the region?

☒ No ☐ Yes If yes, please identify related proposals.

What is the estimated capital expenditure for development of the project?

The Project has an estimated capital investment value of approximately $10 billion.

4. Project alternatives

Brief description of key alternatives considered to date (eg. locational, scale or design alternatives. If relevant, attach A4/A3 plans):

The proposed action must be undertaken within the Feasibility Licence Area (FL-012), and the proposed VicGrid's Gippsland Shoreline REZ and Connection Hub areas.

Within these constraints, the Referral Area represents a broad investigation area for further investigation of potential infrastructure locations.

Brief description of key alternatives to be further investigated (if known)**:**

The Referral Area represents a broad investigation area for siting infrastructure and provides two options for routing of the export cables, a north-eastern option and a south-western option and corresponding options for potential shore crossing locations at either McGaurans Beach or Reeves Beach, respectively. The temporary footprint (during construction stage) and permanent footprint (during operations stage) would be much smaller once the export cable route and the VicGrid Connection Hub locations are confirmed.

However, this Project is being developed to consider and align with the VTP and VicGrid Gippsland Offshore Wind Transmission Project. This includes the Gippsland Shoreline REZ, as well as the proposed Giffard Terminal Station area and the recently published offshore wind shoreline crossing area, released by VicGrid in late 2025, as shown in **Figure 1-7** of **Attachment 1**.

5. Proposed exclusions

Statement of reasons for the proposed exclusion of any ancillary activities or further project stages from the scope of the project for assessment:

The Project is located in both Commonwealth and Victorian state waters. Direct impacts of the wind turbines and offshore cables that are located within the Commonwealth jurisdiction on values in Commonwealth waters are excluded from this referral and will be subject to separate assessment under the EPBC Act. However, potential indirect impacts experienced within Victoria that are associated with Project components located in Commonwealth waters are addressed in this referral.

The Project is related to other actions and proposals in the region, as described below:

- **Aurora Green Offshore Wind Farm Preliminary Surveys, Iberdrola Australia OW2 Pty Ltd (EPBC No. 2024/09968)**

  Preliminary baseline characterisation surveys for the Project were the subject of a separate EPBC referral in 2024. These surveys are required to collect geotechnical, benthic, archaeological, contamination and geophysical information to inform early project

development. The proposed action was deemed not a controlled action if undertaken in a particular manner.

- **Gippsland Offshore Wind Transmission 2GW Project, VicGrid (EPBC No. 2024/09980)**

  New transmission infrastructure is required in Gippsland to connect future offshore wind energy facilities to the existing transmission network located in the Latrobe Valley. To enable the initial 2 GW of offshore wind generation capacity (by 2032) target of the Victorian Government to be achieved, VicGrid (an administrative office of the Victorian Department of Energy, Environment and Climate Action (**DEECA**)), proposes the Gippsland Offshore Wind Transmission 2 GW Project, which would comprise the construction, operation and decommissioning of a new overhead transmission line from an onshore connection hub (i.e. the VicGrid Connection Hub) in the area of Giffard inland from the Gippsland coast to a grid connection near Loy Yang Power Station in the Latrobe Valley. The Project relies on the VicGrid Connection Hub, in order to have a connection to Victoria's electricity grid and the National Electricity Market.

Ancillary infrastructure
Not included in the Referral Area, but associated with the Project are:

- **Operations and Maintenance facility,** The O&M facility for the Project would be located at a nearby port location. The O&M facility is not part of the Referral Area.
- **Temporary ancillary infrastructure,** to support the construction phase of the Project. This includes the use of a construction port(s) where marine operations would be controlled from, such as marshalling, pre-assembly and storage of components during the construction phase. Minor upgrade works may be required to facilitate the anticipated construction traffic. Potential utilities services relocations and/or upgrade works may be required to facilitate the onshore infrastructure. Any associated approvals would be delivered by others.

6. Project implementation

Implementing organisation (ultimately responsible for project, ie. not contractor)**:**

Iberdrola Australia

Indicative implementation timeframe

While the proposed action is relevant to the entirety of the Project, Aurora Green Offshore Wind Project would be developed in phases, as shown by the below indicative timeline:

- 2028: Project Primary Approvals
- 2029: Commercial Licence and Final Investment Decision (**FID**) - internal approval to appoint contractors)
- 2030 – 2033: Phase 1: Construction
- 2033 – 2063: Phase 1: Commercial Operation
- 2034 – 2037: Phase 2: Construction
- 2037 – 2067: Phase 2: Commercial Operation
- 2038 – 2040: Phase 3: Construction
- 2040 – 2070: Phase 3: Commercial Operation
- From 2063 – Anticipated decommissioning

The timing provided above is subject to grid availability, approvals and investment decisions.

Proposed staging (if applicable):

Iberdrola Australia's approach to the Project considers a staged development and construction, with three phases (as outlined above), each of nominally 1 GW installed capacity, subject to commercial offtake, grid connection availability and approvals. The proposed Project life cycle schedule considers a sequential and optimised construction of each phase based on expected grid and port capacities.

While the Project is proposed to be developed in phases (nominally 3 phases), all phases are included in the proposed action that is the subject of this referral.

7. Description of proposed site or area of investigation

Has a preferred site for the project been selected?

☐ No ☒ Yes If no, please describe area for investigation.

If yes, please describe the preferred site in the next items (if practicable).

General description of preferred site, (including aspects such as topography/landform, soil types/degradation, drainage/ waterways, native/exotic vegetation cover, physical features, built structures, road frontages; attach ground-level photographs of site, as well as A4/A3 aerial/satellite image(s) and/or map(s) of site & surrounds, showing project footprint):

The Referral Area relates to the onshore area and the offshore area of Victorian coastal waters up to the 3 nautical mile (**nm**) limit to the shoreline crossing point at Reeves Beach or McGaurans Beach.

Potential indirect impacts of activities in Commonwealth waters on values within Victoria are considered in this referral.

Offshore wind farm feasibility licence area (Commonwealth waters)

The OWF would be located within the area of offshore wind Feasibility Licence FL-012 within Commonwealth waters, approximately 25 km offshore from Woodside Beach and Seaspray in Bass Strait, approximately 65 km east of Wilsons Promontory. Water depths within the OWF area range from approximately 40 m to 60 m AHD.

Generally, the OWF comprise of calcareous gravel, sand (sublittoral and muddy sand), and silt with no overlapping Commonwealth-designated Key Ecological Features (**KEFs**), or Victorian-designated Marine Key Ecological Features (**MKEF**).

Broad-scale benthic habitat mapping within and adjacent to the OWF identified that coral, mangrove, seagrass and macroalgae communities are not mapped within the OWF area.

Existing uses of the area include commercial shipping activity, petroleum industry activity and commercial fisheries. As part of the Gippsland Declared Area, a number of other feasibility licence areas for the Gippsland Offshore Wind Zone are located near the OWF area, including Star of the South to the west, Great Eastern Offshore Wind to the south-west and Blue Mackerel to the north-west between the OWF area and the coastline.

The primary transport route to and from the OWF area during the construction phase of the Project is subject to further investigation and the outcome of the other related projects. During the operations and maintenance phase of the Project, the primary transport route would be from the O&M facility (location to be determined).

Export cable corridor investigation area (offshore) (Commonwealth and Victorian state waters)

The ECC investigation area (offshore) is located between the Gippsland coastline and the OWF area. Seafloor gradients are generally low in this area. From the shoreline to the OWF, the water depth transitions at a relatively steady gradient offshore from with a relatively featureless profile from 0 m at the shoreline to approximately 45 m at the boundary of the OWF.

Combined diurnal and semi-diurnal tidal levels range from -1.04 m at the Lowest Astronomical Tide (**LAT**) and 0.82 m at the Highest Astronomical Tide (**HAT**). Several current systems prevail within, and in the vicinity of, Bass Strait. The offshore portion of the Referral Area are affected by the warmer and saltier waters of the South Australian Current (**SAC**), the East Australian Current (**EAC**) and sub-Antarctic Surface Water (**SASW**). Sea temperatures range from 13°C in winter to 17–18°C in summer.

The coastal waters to the ECC contain areas of patch reef, associated with the newly designated "Woodside Patch Reefs" and the "Twenty Fathom Shelf Reef", as mapped by DEECA in the Victorian-designated Marine Key Ecological Features (**MKEFs**) as defined in DEECA's Victoria's Framework for Identifying Marine Key Ecological Features (2025). Two areas of littoral sand in State waters within the ECC are also newly Victorian-classified MKEFs: "Woodside Ocean Beaches" and "Woodside Offshore Sediment Bed".

Ninety Mile Beach Marine National Park lies outside but adjacent to the north-eastern boundary of the Referral Area. Broad-scale benthic habitat mapping within and adjacent to the ECC investigation area (offshore) identified that seagrass meadows, kelp forests and macroalgae communities occur along the Victorian coastline to the east and west.

Generally, the offshore portion of the Referral Area comprise of calcareous gravel, sand (sublittoral and muddy sand), and silt with no overlapping Commonwealth-designated KEFs.

Existing and historical uses of this area are similar to the OWF area. In addition to recreational boating and fishing in inshore area include:

- The north-east corridor of the ECC investigation area (offshore) contains the Perch and Dolphin platforms associated with Production Licences VIC/L17 and VIC/L15 for Esso Australia Resources Pty Ltd. Closer to shore, there is potential in the area for unexploded ordnance (**UXO**) related to a former defence air weapons range.
- Several existing and proposed pipelines and cables intersect the ECC investigation area (offshore) including the Tasmanian Gas Pipeline, which transports gas from Longford in Victoria, under Bass Strait, to Bell Bay in Tasmania and the Basslink high-voltage direct current (**HVDC**) Interconnector and telecoms cable.
- There is a shipwreck within the Victorian coastal waters of the Referral Area – the Victorian Heritage Register (**VHR**) listed site (the 'Sarah') located off Woodside Beach.

Export cable corridor investigation area (onshore)

The ECC investigation area (onshore) lies within the Wellington LGA and covers land predominantly zoned as Farming Zone. This area also aligns with the Gippsland Shoreline REZ, as per VicGrid's 2025 Victorian Transmission Plan. The area comprises agricultural properties surrounding the townships of Woodside, Woodside Beach, Darriman and Giffard, as well as a number of reserves including Mcloughlins Beach-Seaspray Coastal Reserve, Woodside Beach Wildlife Reserve, Darriman H29 and H33 Bushland Reserves, Woodside H27 and H28 Bushland Reserves, Warrigal Creek Streamside Reserve and Warrigal Creek Water Frontage. The Referral Area avoids land zoned for conservation associated with the Jack Smith Lake Wildlife Reserve and residentially zoned land associated with Woodside Beach. Surrounding areas include Mullungdung State Forest to the west and Giffard (Rifle Range) Flora Reserve to the north. The coastline comprises areas of McGaurans Beach, Woodside Beach and Reeves Beach.
The onshore portion of the Referral Area is mostly comprised of large agricultural properties across predominantly flat terrain within the Gippsland Plains bioregion, within the Wellington LGA and under the West Gippsland Catchment Management Authority (**CMA**). The Gippsland Plains bioregion is generally under 200 m above sea level and so consists of low elevation.

Major roads in the Referral Area include the South Gippsland Highway, Woodside Beach Road and Giffard Road. Transport routes to the onshore area would primarily be via South Gippsland Highway. Access routes to the southern part of the area include Cherry Tree Road, Woodside Beach Road, Balloong Road and Reeves Beach Road. Access to the northern part of the area is predominantly via Giffard Road, Giffard West Road and McGaurans Beach Road.

Further description of the onshore portion of the Referral Area is provided below.

Hydrology –

The onshore portion of the Referral Area is located at a coastal environment and includes several waterways including Merriman Creek and Bruthen Creek. A number of smaller drainage lines are present within the onshore portion of the Referral Area that drain into Jack Smith Lake. There are mostly small ephemeral freshwater lakes and swamps or unclassified wetlands, scattered throughout the broader landscape.

Future investigations on hydrology will be undertaken to determine the local drainage conditions in the vicinity of the proposed onshore assets.

Soil –

A review of the Australian Soil Resource Information System (**ASRIS**) indicates that there is an extremely low probability of Acid Sulphate Soils (**ASS**) of occurring inland of the Referral Area. However, along the coast, there is a mix of areas where ASS ranges from having a high probability to an extremely low probability to occur.

Located within the Gippsland Plain bioregion, the primary soil types of onshore portion of the Referral Area is Sodosol and Rudosol.

Native vegetation –

Historically the Referral Area has supported a diverse array of terrestrial woodland and grassland habitat, and aquatic habitat. Due to historic clearing for agricultural practices, the Referral Area encompasses only around 3,320 ha of remnant native vegetation. Remnant native vegetation is largely restricted to road reserves, various Protected Areas, isolated pockets of woodland and grassland within the agricultural matrix, and as sparse scattered trees.

Modelling of native vegetation extent by DEECA suggests these remnants cover approximately 14% of the onshore portion of the Referral Area.

Site area (if known):

The total Referral Area for the Project's Victorian components is approximately 305 km^2.

Route length and width (for linear infrastructure):

The length of the export cable (transmission) route would be informed by additional investigations and design development and would depend on the locations of the final shore crossing location and the final VicGrid Connection Hub. The transmission route length would likely be approximately 10 km if located between the shore crossing location at McGaurans Beach and the VicGrid Connection Hub or approximately 30 km if located between the shore crossing at Reeves Beach and the VicGrid Connection Hub (depending on the final design and location of the VicGrid Connection Hub).

The ECC temporary construction footprint width at this early development stage is anticipated to be up to approximately 200 m. The permanent infrastructure footprint would be much smaller than the temporary construction footprint. At this early development stage, the permanent infrastructure footprint for the ECC is anticipated to be less than 100 m wide.

Current land use and development:

Offshore marine uses

Activities within the offshore portion of the Referral Area (within Victorian state waters) include:

- Recreational boating, recreational fishing, commercial fisheries, and other recreational users (swimmers, surfers, wind/kite surfers, SCUBA divers, and free divers/spear fishers).
- Fishing is a major attraction for many visitors and local residents, with various opportunities for lake, beach fishing and fishing throughout the region, as well as various charter boat and deep-sea fishing businesses that operate in the region.

- The ECC investigation area (offshore) includes 8 commercial fisheries (including Scallop (Ocean) Fishery, Rock Lobster Fishery (Eastern Zone), and Octopus Fishery (Central and Eastern Zones)).
- The Basslink HVDC Interconnector and telecoms cable (Telstra/Basslink Telecoms) passes through the onshore investigation area.
- The ECC investigation area is within DPA R359F, which is associated with defence activities from the East Sale RAAF Base used for air surveillance, Royal Australian Air Force training and may also support navy vessel and submarine activities on occasion.
- There is the potential for UXO to occur within the Referral Area. Two former Air Weapons Ranges are adjacent to the north-east portion of the offshore ECC investigation area. One site was used as an Air Weapons Range during WWII and overlaps the offshore ECC investigation area within Victorian state waters.
- Several offshore oil and gas facilities are located to the north-east of the OWF area and ECC investigation area offshore, many of which are located in the 'Area to be Avoided', an area gazetted under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*.

Proposed uses

- In 2024, the Australian Government granted 12 feasibility licences for offshore wind projects off Gippsland's coast in Victoria. As of October 2025, there are 10 active feasibility licences within the Gippsland Declared Area OEI-01-2022, including Iberdrola Australia's Aurora Green Feasibility Licence FL-012. Other offshore wind projects proposed nearby the Aurora Green Feasibility License area include:
    - The Blue Mackerel North Offshore Wind Project – located inshore (north-west) of the OWF area.
    - Great Eastern Offshore Wind – located adjacent (south-west) of the OWF area.
    - Star of the South – located west of the OWF area.
    - Gippsland 01 and Gippsland 02 – located offshore (south-west) of the OWF area.
    - High Sea Wind – located south-east of the OWF area.

Onshore land uses

The onshore portion of the Referral Area includes the following activities:

- Agriculture – agricultural infrastructure and residential buildings area are present throughout the Referral Area. Agriculture activity consists of a mix of grazing and some cropping. A portion of Giffard Plantation intersects with the Referral Area.
- Conservation and/or recreational reserves – there is land used for conservation or recreational purposes within the Referral Area including:
    - Fresh-water Swamp, Woodside Beach Wildlife Reserve
    - Warrigal Creek Streamside Reserve
    - Darriman H29 and H33 Bushland Reserve
    - Woodside H27 and H28 Bushland Reserve
    - McLoughlins Breach – Seaspray Coastal Reserve.
    - Gifard (Rifle Range) Flora Reserve.
- Coastal settlement – a number of communities are situated along the coastline within or close to the Referral Area. The main coastal settlements adjacent to the Referral Area are Woodside Beach and Seaspray (approx. 7 km north-east of Referral Area). Other local towns include Woodside, Darriman and Giffard.
- Traditional Owners – the Gunaikurnai People hold registered Native Title over sections of the Referral Area, including onshore and offshore.

Description of local setting (eg. adjoining land uses, road access, infrastructure, proximity to residences & urban centres):

The coastal portion of the Referral Area is located between Reeves/Woodside Beach and McGaurans Beach, consisting of residential properties, agricultural properties, Crown land, road corridors and land vested with the Gunaikurnai People. The ECC investigation area (onshore) abuts the Corner Inlet Ramsar site to the southwest and continues northeast from Reeves Beach towards McGuarans Beach, avoiding the township of Woodside Beach and Jack Smith Lake. Moving inland, the western boundary avoids the township of Woodside and follows the South Gippsland Highway north to Giffard West and the Giffard Plantation.

The Referral Area generally has a low population density, with the coastal area, and nearby towns being largely undeveloped. The main coastal settlements located adjacent to the Referral Area are Woodside Beach (population of 114), Seaspray (population of 373) and The Honeysuckles (population of 131). The nearest regional hub is Sale (population of 15,301), located approximately 30 km north of the ECC investigation area.

Major roads in the Referral Area include the South Gippsland Highway, Woodside Beach Road and Giffard Road. Transport routes to the area would be via South Gippsland Highway. Access routes to the southern part of the area include Cherry Tree Road, Woodside Beach Road and Balloong Road. Access is to the northern part of the area is predominantly via Giffard Road and Giffard West Road.

The offshore portion of the Referral Area is predominately used for recreational and local fishing and boating activities, as well as by tourism as described above in the spring and summer months.

Planning context (eg. strategic planning, zoning & overlays, management plans):

The Referral area is subject to the Wellington Planning Scheme under the *Planning and Environment Act 1987* (Vic). The Planning Scheme sets out the relevant planning policies that a responsible authority must consider when administering the use and development of land.

State Planning Policy Framework

The State Planning Policy Framework sets out the Victorian Government's overarching planning policies and strategic directions, guiding land use and development to achieve state-wide objectives such as sustainable growth, environmental protection, and renewable energy development.

Key clauses relevant to the Project include but are not limited to:

- **Clause 11 Settlement**, including Clause 11.03-4S Coastal Settlement, Clause 11.03-5S Distinctive Areas and Landscapes and Clause 11.03-6S Regional and Local Places.
- **Clause 12 Environmental and Landscape values**, including Clause 12.01 Biodiversity, and Clause 12.02 Marine and Coastal Environment.
- **Clause 13 Environmental Risks and Amenity** including Clauses 13.01-2S Coastal Inundation and Erosion, 13.02 Bushfire and 13.07-1S Land Use Compatibility.
- **Clause 14 Natural Resource Management**, including Clause 14.01-1S Protection of Agricultural land.
- **Clause 15 Built Environment and Heritage**, including Clause 15.03 Heritage.
- **Clause 17 Economic Development**, including Clause 17.04-2S Coastal and Maritime Tourism and Recreation.
- **Clause 18 Transport**, including Clause 18.02-6S Ports.
- **Clause 19 Infrastructure**, including Clause 19.01 Energy.

Zones and overlays

Planning zones and overlays establish the statutory controls that regulate land use, development, and protection of environmental and heritage values.

The Referral area is affected by the following planning controls:

- Zones
    - **Farming Zone –** to protect and promote agricultural use of land while supporting sustainable land management.
    - **Transport Zone 2 (Principal Road Network) and Transport Zone 3 (Significant Municipal Road)** – to provide for an integrated and sustainable transport system.
    - **Public Conservation and Resource Zone** – to protect and conserve the natural environment and natural processes for their historic, scientific, landscape, habitat or cultural values.
    - **Public Park and Recreation Zone** – to protect and conserve areas of significance where appropriate.
- Overlays
    - **Environmental Significance Overlay (ESO1, ESO2)** – to ensure that development is compatible with identified environmental values.
    - **Bushfire Management Overlay** – to ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
    - **Specific Controls Overlay (SCO2)** – land use and develop control for the existing Basslink.

Refer to **Figure 1-4** in **Attachment 1** (Planning Zones) and **Figure 1-5** in **Attachment 1** (Planning Overlays).

Particular Provisions

Particular provisions are state-wide planning requirements (in additional to zone and overlay controls) that apply to specific land uses, development types or environmental considerations.

Pending the final design for the Project, a planning permit may also be required to facilitate the Project under the following particular provisions:

- Clause 52.02 Easements, restrictions, and reserves.
- Clause 52.02 Signs.
- Clause 52.06 Car Parking.
- Clause 52.17 Native Vegetation.
- Clause 52.29 Land adjacent to the Principal Road Network.

Local government area(s):

Wellington Shire Council

8. Existing environment

Overview of key environmental assets/sensitivities in project area and vicinity
(cf. general description of project site/study area under section 7)**:**

Desktop reviews including the Terrestrial Ecological Desktop Assessment (ERM, 2025a) (**Attachment 3**), Preliminary Marine Assessment Report (ERM, 2025b) (**Attachment 4**), Preliminary Landscape and Visual Impact Appraisal (Hansen Partnership, 2025) (**Attachment 5**) and Preliminary Heritage Assessment (ERM, 2025c) (**Attachment 6**) have been prepared to understand environmental assets and sensitivities within the Referral Area. An overview of the key environmental values identified by these assessments is provided below.

Offshore environment

Marine and coastal protected areas

The Referral Area does not overlap with any marine and coastal protected areas, however, the ECC investigation area (offshore) within Victorian state waters is adjacent to the Ninety Mile Beach Marine National Park.

Benthic habitat and ecological communities

The Referral Area generally comprises of calcareous gravel, sand, and silt. A number of Victorian-designated MKEFs are overlapping the ECC investigation area, and no Commonwealth KEFs are overlapping the Referral Area. Within the offshore Referral Area, gravel content generally decreases with distance from shore. Coral, mangrove, seagrass and macroalgae communities are not mapped within the Referral Area, however, these habitats do occur along the Victorian coastline to the east and west of the Referral Area.

Benthic habitat surveys will be undertaken, and placement of foundations, cables and other infrastructure will be located to avoid or minimise disturbance to sensitive habitats and communities.

Biologically Important Areas (**BIA**)

A BIA is indicative of an area with a high level of importance for species such as those listed as threatened or migratory under the EPBC Act. Desktop assessment identified 6 BIAs that overlap the Referral Area for:

- Southern Right Whale (Reproduction and Migration).
- Pygmy Blue Whale (Foraging).
- White Sharks (Breeding (nursery area)).
- 3 seabirds and migratory shorebirds (including Shy Albatross (Foraging), Short-tailed Shearwater (Foraging) and Common Diving-Petrel (Foraging).

Further investigations are required to determine whether the Referral Area would support breeding habitat, resting or migrating and foraging habitat that would be critical for these species.

Flora, fauna and native vegetation

Threatened flora:

No EPBC Act or *Flora and Fauna Guarantee Act 1988* (**FFG Act**) listed flora species were found to be present in the offshore portion of the Referral Area.

Threatened fauna:

Desktop assessment identified 49 FFG Act-listed threatened species, 55 EPBC-listed threatened species and 72 EPBC-listed migratory species with the potential to occur in the offshore portion of the Referral Area, consisting of:

- 3 fish and shark species (Whale Shark, White Shark, Australian Grayling)
- 4 cetacean species (Blue Whale, Southern Right Whale, Fin Whale, Sei Whale)
- 3 marine turtle species (Leatherback Turtle, Loggerhead Turtle, Green Turtle)
- 45 bird species (4 land birds, 16 shorebirds and 25 seabirds).

Threatened ecological communities:

One marine threatened ecological community, the *Subtropical and Temperate Coastal Saltmarsh* has a likelihood to occur within the offshore portion of the Referral Area. However, this ecological community is mainly associated with the soft substrate shores of estuaries and embayments and

not the open ocean shorelines. As such this community is not anticipated to occur within the offshore portion of the Referral Area.

Native vegetation:

Based on the definition of native vegetation as described in the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017), seagrass and algae may potentially be considered native vegetation and is present in coastal waters near the Referral Area. However, the native vegetation requirements under the Victorian Planning Provisions apply only to onshore environments and do not extend offshore.

Heritage

There is one shipwreck within the offshore portion of the Referral Area, the 'Sarah' which is listed on the VHR listed site (the 'Sarah').

Further details provided in Section 15 of this form.

Onshore environment

Aboriginal cultural and historic heritage

The majority of the onshore portion of the Referral Area intersects with areas of Aboriginal Cultural Heritage Sensitivity and contains a number of known Aboriginal heritage places listed on the Victorian Aboriginal Heritage Register (**VAHR**). The Gunaikurnai Land and Waters Aboriginal Corporation (**GLaWAC**) is the Registered Aboriginal Party for the Referral Area.

Past occupation within the onshore portion of the Referral Area would have been heavily focused on key water courses and associated wetlands as rich resource procurement areas. Consequently, most archaeological sites area considered to be adjacent to freshwater sources / within riverine corridors.

The onshore portion of the Referral Area also contains areas of high archaeological potential – one VHR place, S875 (Unconfirmed Buried Wreck, Mclouglins Beach), and two Victorian Heritage Inventory (**VHI**) (archaeological) items, including H8321 – 0005 (Warrigal Creek Massacre Site) and H8220-0025 (Former Residence, Woodside Beach Road).

Conservation and recreational reserves

The onshore portion of the Referral Area is located in South Gippsland in the Gippsland Plain Bioregion. Areas of higher ecological value are represented by a number of conservation reserves. The Referral Area contains a number of parcels of public land, used for conservation or recreational purposes, including:

- Fresh-water Swamp, Woodside Beach Wildlife Reserve
- Warrigal Creek Streamside Reserve
- Darriman H29 and H33 Bushland Reserves
- Woodside H27 and H28 Bushland Reserves
- Mcloughlins Beach-Seaspray Coastal Reserve
- Giffard (Rifle Range) Flora Reserve.

The Project will seek to avoid direct impacts to these conservation and recreational reserves so far as is reasonably practicable as the Project design develops and progresses through feasibility and technical environmental studies.

Flora, fauna and native vegetation

Threatened flora:

An assessment of the likelihood of occurrence of threatened flora determined the potential presence of:

- 35 species listed as threatened under the FFG Act.
- 10 flora species listed as threatened under the EPBC Act.

Threatened fauna:

An assessment of the likelihood of occurrence of threatened fauna determined the potential presence of:

- 34 fauna species listed as threatened under the EPBC Act.
- 22 migratory fauna species protected under the EPBC Act.

Threatened ecological communities:

An assessment of the likelihood of occurrence of threatened ecological communities determined the potential presence of:

- 2 ecological communities listed under the FFG Act (*Coastal Moonah Woodland and Central Gippsland Plains Grassland*).
- 2 threatened ecological communities listed under the EPBC Act (*Natural Damp Grassland of the Victorian Coastal Plains and Subtropical and Temperate Coastal Saltmarsh*).

Native vegetation:

Given the historical land use and associated disturbance, most of the Referral Area is unlikely to support native vegetation. Modelling of native vegetation extent by DEECA suggests these remnants now only cover approximately 14% of the total onshore portion of the Referral Area. All native vegetation in the onshore portion of the Referral Area is likely representative of Ecological Vegetation Classes (**EVC**) that have a Biodiversity Conservation Status (**BCS**) of the following: Depleted (90.50 ha or 0.39%), Least Concern (382.14 ha or 1.64%), Endangered (164.37 ha or 0.71%) or Vulnerable (2,484.66 ha or 10.69%).

Where native vegetation is present, it is likely to primarily occur in moderate to small sized patches in reserves, road reserves and along drainage channels. These areas can be easily avoided or may require removal of a small amount of native vegetation.

Landscape and visual

There are no areas of National Landscape Significance, however there are features of State, regional and local significance within the Referral Area.

Project onshore infrastructure may potentially be located near or parallel to the Ninety Mile Beach, noting most onshore infrastructure will be installed below ground. The Ninety Mile Beach Coast is recognised as a landscape of State significance for its largely unspoilt natural character (discussed further in Section 14 of this form). Sensitivity of the coastline, including Ninety Mile Beach, arises from scenic values, natural character and tourism and local use.

9. Land availability and control

Is the proposal on, or partly on, Crown land?

☐ No ☒ Yes If yes, please provide details.

Within the offshore portion of the Referral Area, the seabed of Victorian state waters is Crown land.

Land tenure in the onshore portion of the Referral Area is a mix of private freehold and Crown land, including areas for government roads, services and utilities land, parks and reserves, recreation areas and plantations. Crown land within the Referral Area includes McLoughlins Beach-Seaspray Coastal Reserve, Darriman H29 and H33 Bushland Reserves, Woodside H27 and H28 Bushland Reserves, Warrigal Creek Streamside Reserve and Warrigal Creek Water Frontage and Woodside Beach Wildlife Reserve. Confirmation regarding which Crown land

parcels will be directly impacted will be provided once the location of onshore infrastructure and corridor locations is finalised. However, the Project will seek to avoid Crown land where possible.

Current land tenure (provide plan, if practicable):

Land tenure within the Referral Area comprises a mix of private, public and Crown land (as described above) as well as Native Title. Refer to **Figure 1-2** of **Attachment 1** (Land Use Tenure).

Intended land tenure (tenure over or access to project land):

After confirming placement of onshore infrastructure and corridor locations, Project land requirements will be secured via negotiation of easements or lease/license agreements applied to private freehold land where these areas cannot be avoided. Lease/license agreements, easements and/or land transfers will be required with relevant state bodies to enable access to or tenure of affected public land, including Crown land and for both onshore and offshore areas.

Other interests in affected land (eg. easements, native title claims):

The Referral Area contains various utility easements and transport corridors. The Project would seek to collocate Project infrastructure within these areas so far as is reasonably practicable to minimise impacts. This is subject to further Project investigations, design development and engagement with relevant stakeholders.

Native Title rights and interests, as recognised in determination VCD2010/001, are held by the Gunaikurnai people and administered by GLaWAC. In addition, Indigenous Land Use Agreements (**ILUA**) have been previously established within the Referral Area between Traditional Owners and proponents for activities on Crown land (VI2010/003 and V12013/008).

Where appropriate, the Project may seek to enter into an ILUA, or other agreements under the *Traditional Owner Settlement Act 2010* following further engagement with GLaWAC.

10. Required approvals

State and Commonwealth approvals required for project components (if known):

The Project is in both Commonwealth and Victorian jurisdictions, including Commonwealth waters and Victorian waters and land. The following Commonwealth and Victorian approvals and consents would likely to be required, pending finalisation of the Project design and route selection.

Primary Approvals

Commonwealth –

- Referral under the EPBC Act was lodged (21 October 2025) for a decision as to whether the Project is a 'controlled action' requiring assessment and approval under the EPBC Act.
- Components of the Project in Commonwealth waters would require licences under the OEI Act including a Commercial Licence (and associated Management Plan), and Transmission and Infrastructure Licence(s).

State –

- Referral under the *Environment Effects Act 1978* (Vic) (**EE Act**) to determine whether an assessment under the EE Act is required (this referral). This would apply to Project components and activities within Victoria (i.e., onshore and in Victorian coastal waters).
- Planning approval pursuant to the *Planning and Environment Act 1987* (Vic): Approval for the use and development of land likely via a Planning Scheme Amendment.
- Consent under the *Marine and Coastal Act 2018* (Vic) for works on marine and coastal Crown land.

- Approval of Cultural Heritage Management Plan (**CHMP**) pursuant to the *Aboriginal Heritage Act 2006* (Vic).

Secondary Consents

Depending on the final siting and design of project infrastructure and the construction methodology, specific components and activities of the Project may be subject to various secondary consents and compliance requirements, including:

- A sea dumping permit under the *Environment Protection (Sea Dumping) Act 1981* (Cth) in case that dredging/trenching are required
- Permit under the *Underwater Cultural Heritage Act 2018* (Cth) in relation to protected wrecks and/or protection zones
- Permit or consent under the *Heritage Act 2017* (Vic) in relation to registered heritage places
- Leases and licences pursuant to the *Land Act 1958* (Vic)
- Licence pursuant to the *Crown Land (Reserves) Act 1978* (Vic)
- Consent pursuant to the *Road Management Act 2004* (Vic) for works within a road reserve
- Permit pursuant to the FFG Act for taking of wildlife and removal of flora species
- Permit pursuant to the *Water Act 1989* (Vic) for works on waterways
- Permit to take (disturb) wildlife under the *Wildlife Act 1975*.

Have any applications for approval been lodged?

☒ No ☐ Yes If yes, please provide details.

Approval agency consultation (agencies with whom the proposal has been discussed):

Iberdrola Australia has commenced formal engagement with the following agencies:

- Victorian Department Transport and Planning (**DTP**)
- Commonwealth Department of Climate Change, Energy, the Environment and Water (**DCCEEW**)
- Victorian Department of Energy, Environment and Climate Action (**DEECA**)
- Gunaikurnai Land and Waters Aboriginal Corporation (**GLaWAC**)
- Wellington Shire Council
- VicGrid
- Offshore Infrastructure Regulator (**OIR**).

Other agencies consulted:

- First Peoples – State Relations (**FP-SR**)
- Offshore Wind Energy Victoria (**OWEV**)
- Offshore Infrastructure Registrar (National Offshore Petroleum Titles Administrator - **NOPTA**).

PART 2 POTENTIAL ENVIRONMENTAL EFFECTS

11. Potentially significant environmental effects

Overview of potentially significant environmental effects (identify key potential effects and comment on their significance and likelihood, as well as key uncertainties):

The following section summarises the potential significant environmental effects that may arise from the Project, based on the desktop assessments that have been completed. Further detailed assessments, including field work of potential impacts will be completed to support the detailed siting and design of Project infrastructure and subsequent impact assessment to support the anticipated Project permitting and approval applications.

Offshore

Potential environmental effects within Victorian state waters

The Preliminary Marine Assessment Report (ERM, 2025b) (**Attachment 4**) identified that there is potential for the overall Project to have an impact on the following:

- Cetaceans, including pygmy blue, southern right, and humpback whales' behaviours, including breeding, foraging, migration and resting, could be disrupted by underwater noise, barrier effects, vessel interactions, and spills, which in turn has the potential to reduce occupancy areas for threatened cetaceans.
- The presence of operating turbines and substation platforms to pose collision risks and migration barriers for birds, and in turn deter species from using areas of the marine environment that they currently use.

The potential impacts arising from activities within Victoria state waters are largely limited to the construction and installation activities of the export cable infrastructure and are, therefore, expected to be temporary and localised. The more potentially significant impacts associated with the Project are anticipated to relate to construction and operation of the OWF, which, at its closest point, is located approximately 19 km from the limit of state waters and 25 km from the shoreline. All listed species within the marine environment are known to be mobile and occur over large areas. The proposed infrastructure would not be located where it would constitute a complete barrier across a species population's distribution or migration route.

Potential environmental effects from activities in adjacent Commonwealth waters

Although the extent of impacts from activities in Commonwealth waters may have some geographic overlap with Victorian environmental values, the scale of any impact is expected to be limited given the distance. Potential indirect effects to the Victorian marine and terrestrial environment from Project activities in Commonwealth waters may include:

- Changes to water quality from increased turbidity, suspended sediment, planned discharges or unplanned events (e.g., accidental spills).
- Disturbance and displacement of marine fauna from vessel interactions, underwater construction noise emissions and electro-magnetic field (**EMF**) effects during operation.
- Collision, barrier and displacement effects to FFG Act-listed bird species and other migratory marine fauna migrating across Victorian and Commonwealth regions.
- Changes to the local hydrodynamic processes due to physical presence of marine infrastructure.
- Impacts on marine fauna from vessel and offshore infrastructure lighting.
- Impacts on local marine habitat and fauna from introduction of marine infrastructure and pest species.
- Disruption to existing commercial and recreational activities including shipping, commercial fisheries, tourism and recreation.
- Impacts to visual amenity from Victorian coastal communities and viewing locations.

It is expected that a detailed EPBC assessment process will be undertaken, informed by the decision on the Project's EPBC referral, which will establish appropriate mitigation measures and approval conditions to ensure potential impacts are managed to acceptable levels.

Onshore

Native vegetation

As set out in the Terrestrial Ecological Desktop Assessment (ERM, 2025a) (**Attachment 3**), modelling of native vegetation extent by DEECA suggest that only 14% of the onshore portion of the Referral Area contains native vegetation comprising of 13 EVCs:

- 2 EVCs with a BCS of Endangered.
- 6 EVCs with a BCS of Vulnerable.
- 2 EVCs with a BCS of Least Concern.
- 1 EVC with a BCS of Depleted.
- 2 EVCs with no assigned BCS.

It is anticipated that majority of the native vegetation reside within state parks, reserves, and roadside corridors with the most significant area of native vegetation likely to be along the coast to the foreshore and coastal dune systems of McGaurans Beach. The Project will seek to avoid direct impacts to these conservation and recreational reserves so far as is reasonably practicable as the Project design develops and progresses through feasibility and technical environmental studies.

The primary potential impact on native vegetation would be due to the clearing required for placement of onshore infrastructure. Field assessment and detailed native vegetation mapping including Vegetation Quality Assessments (**VQA**) would be undertaken to determine extent of impact and identify opportunities to avoid and minimise impacts. The ECC investigation area (onshore) allows for several cable route options, subject to further studies and location of the VicGrid Connection Hub. The final cable corridor to the VicGrid Connection Hub is anticipated to be less than 100 m in width (with a temporary construction corridor width of up to 200 m). In addition, the Project will seek to minimise and avoid impacts to native vegetation and habitats by employing trenchless crossing methods such as Horizontal Directional Drilling (**HDD**) where practicable and utilising already cleared land for Project infrastructure.

Threatened flora and ecological communities

Potential impacts to threatened flora and fauna would primarily be associated with clearance of vegetation. Detailed flora surveys have not yet been undertaken. The desktop assessment identified 35 FFG Act-listed flora species with the potential to occur within the Referral Area:

- 8 flora species with a Critically Endangered listing.
- 24 flora species with an Endangered listing.
- 3 flora species with a Vulnerable listing.

The desktop assessment also identified that the onshore portion of the Referral Area has the potential to support two native vegetation communities listed under the FFG Act:

- Coastal Moonah Woodland.
- Central Gippsland Plains Grassland.

Listed flora species and ecological communities are likely restricted to Protected Areas, coastal-line vegetation including dunes and wetlands, and narrow roadside and riparian corridors. Informed by the findings of future detailed flora surveys, direct impacts on these species would be minimised through corridor selection and by careful micro-siting of onshore Project infrastructure.

Potential indirect effects to FFG Act-listed flora are associated with the introduction of weeds, pest and pathogens during construction.

Through project siting and with the introduction of construction and operational management and mitigation measures, the impacts described above are likely to be avoided or reduced. Where direct and indirect effects on threatened species and communities cannot be avoided, appropriate environmental management measures in both construction and operations would be detailed in the Project's construction and operational environmental management plans. Specific mitigation

measures may be developed to address any residual impacts, which would also be offset in accordance with the FFG Act.

Threatened fauna

The desktop assessment identified 57 FFG Act-listed fauna species that are considered likely or known to occur within the Referral Area:

- 14 fauna species with a Critically Endangered listing.
- 22 fauna species with an Endangered listing.
- 21 fauna species with a Vulnerable listing.

Potential impacts on fauna species are most likely to arise from the clearing of vegetation (and potential habitat) for the placement of onshore Project infrastructure. Detailed fauna surveys have not yet been undertaken. Following further assessment, it is likely that impacts to high value habitat and 'critical habitat' under the FFG Act can be avoided or minimised through corridor selection and by careful micro-siting of onshore Project infrastructure.

Aboriginal cultural and historic heritage

A Preliminary Heritage Assessment (ERM, 2025c) (**Attachment 6**) was prepared to identify and understand Aboriginal cultural and historic heritage within the Referral Area.

The results of the desktop assessment identified that the Referral Area contains a number of listed Aboriginal heritage places including Aboriginal ancestral remains (Burial). Ground disturbance associated with onshore infrastructure installation has the potential to directly or indirectly impact areas of cultural heritage sensitivity or archaeological resources. The Project would seek to avoid known cultural heritage places and undisturbed areas to minimise potential impacts to Aboriginal cultural heritage. A CHMP for the Project would be mandatory, as a high impact activity is proposed within areas of cultural heritage sensitivity, in accordance with the *Aboriginal Heritage Act 2006* (Vic) and associated regulations. The anticipated CHMP for the Project will provide contingency protocols and sufficient mitigation for potential Project impacts.

The desktop assessment also identified one VHR, and two VHI (archaeological) items within the onshore portion of the Referral Area and one recorded shipwreck within the offshore portion of the Referral Area. The Project will seek to avoid known historic heritage places, as such no direct impacts are anticipated. A historic heritage impact assessment will be carried out for any registered historic heritage places, areas of archaeological sensitivity or shipwrecks potentially impacted by the Project.

Landscape and visual

The Referral Area is adjacent to the Ninety Mile Beach Marine Park, which is associated with the Ninety Mile Beach coast. The Preliminary Landscape and Visual Impact Appraisal (Hansen Partnership, 2025) (**Attachment 5**) identifies that the OWF would be visible from representative locations at Golden Beach, Seaspray Beach and Woodside Beach. The significance of the potential impacts will be assessed through a detailed landscape and visual impact assessment of the Project.

There is also the potential for landscape and visual impacts from onshore Project infrastructure such as the onshore substation. Other onshore infrastructure including shore crossing and export cables are proposed to be underground and therefore visual impacts would be minimised. A detailed assessment of the potential impacts of the onshore Project infrastructure will be undertaken as the Project progresses.

12. Native vegetation, flora and fauna

Native vegetation

Is any native vegetation likely to be cleared or otherwise affected by the project?

☐ NYD ☐ No ☒ Yes If yes, answer the following questions and attach details.

Native vegetation clearing may be required to facilitate construction and placement of the onshore Project infrastructure, including the underground export cable, the landfall site for the shore crossing and the substation for connection to the grid, in locations where it cannot be completely avoided.

The extent of native vegetation clearance is not yet known but is expected to be less than 10 ha. As the Project design and assessment processes progress, mapping of native vegetation in the Referral Area will determine opportunities to avoid and minimise impacts. Preference will be given to routes that avoid native vegetation areas and those containing threatened ecological species and communities. The Project will also employ trenchless construction techniques, such as HDD, for shore crossings where practicable to further minimise potential effects.

What investigation of native vegetation in the project area has been done? (briefly describe)

A Terrestrial Ecological Desktop Assessment has been prepared (ERM, 2025a) (**Attachment 3**) to understand the biodiversity values and potential constraints including likely vegetation communities within the onshore portion of the Referral Area.

Field assessment of native vegetation is yet to occur. Field assessment and detailed native vegetation mapping including VQA would commence as the Project progresses and once the onshore cable corridor and connection point are further determined.

What is the maximum area of native vegetation that may need to be cleared?

☒ NYD Estimated area …….(hectares)

Due to the absence of field surveys and a final footprint for the onshore infrastructure, the extent of native vegetation clearance is not yet known. Early calculations indicate that the onshore ECC could have a length of approximately 10-30 km depending upon the shore crossing point and the VicGrid Connection Hub location. The temporary construction footprint width is expected to be up to 200 m, while the permanent infrastructure footprint width is expected to be less than 100 m. However, due to the paucity of native vegetation within the Referral Area, and the opportunities for avoidance and minimisation of impacts through siting and design, the Project is expected to result in the removal of less than 10 ha of native vegetation. Desktop assessments identified that only 14% of the onshore portion of the Referral Area is mapped with native vegetation. It is anticipated that majority of the native vegetation reside within state parks, reserves, and road reserves. The Project will seek to avoid direct impacts to these conservation and recreational reserves so far as is reasonably practicable as the Project design develops and progresses through feasibility and technical environmental studies.

Detailed native vegetation mapping including VQA would be undertaken as the Project progresses and there is more certainty about where infrastructure may be sited within the current onshore investigation area.

How much of this clearing would be authorised under a Forest Management Plan or Fire Protection Plan?

☒ N/A ……. approx. percent (if applicable)

Which Ecological Vegetation Classes may be affected? (if not authorised as above)

☐ NYD ☒ Preliminary/detailed assessment completed. If assessed, please list.

The Terrestrial Ecological Desktop Assessment (ERM, 2025a) included an investigation of EVC mapping and modelling within the onshore portion of the Referral Area.

The assessment identified 13 EVCs, across a total of 3,319 ha, modelled to occur within the onshore portion of the Referral Area, accounting for only approximately 14% of the total onshore portion of the Referral Area. Remnant vegetation is largely restricted to the various conservation and recreational reserves within the Referral Area, isolated pockets of woodland and grassland

within the agricultural matrix, as sparse scatter trees, and within road reserves. The Project will avoid, minimise, and manage the removal of native vegetation so far as is reasonably practicable.

Table 2 Modelled EVCs within the Referral Area (onshore portion):

EVC	BCS	Area (ha)	% of Referral Area (onshore portion)
EVC 1 – Coastal Dune Scrub/ Coastal Dune Grassland Mosaic	Depleted	90.50	0.39
EVC 2 – Coastal Banksia Woodland	Vulnerable	7.80	0.03
EVC 3 – Damp Sands Herb-rich Woodland	Vulnerable	126.56	0.54
EVC 9 – Coastal Saltmarsh	Least Concern	30.65	0.13
EVC 10 – Estuarine Wetland	Least Concern	351.49	1.51
EVC 16 - Lowland Forest	Vulnerable	144.34	0.62
EVC 53 – Swamp Scrub	Endangered	67.81	0.29
EVC 151 – Plains Grassy Forest	Vulnerable	1,193.23	5.14
EVC 191 – Riparian Scrub	Vulnerable	269.84	1.16
EVC 687 – Swamp Scrub/ Plains Grassland Mosaic	Endangered	96.56	0.42
EVC 698 – Lowland Forest/ Heathy Woodland Mosaic	Vulnerable	742.89	3.20
EVC 985 – Sandy Beach	N/A	20.43	0.09
EVC 992 – Water Body (Fresh)	N/A	149.71	0.64

Further information on EVCs present within the Referral Area is provided in Section 3.3 of **Attachment 3**.

Have potential vegetation offsets been identified as yet?

☒ NYD ☐ Yes If yes, please briefly describe.

Where avoidance is not possible, removal of native vegetation would be managed and offset in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017). Offsets for the loss of any species and or communities listed under the FFG Act will be addressed through EVC offsets.

Other information/comments? (eg. accuracy of information)

Refer to **Attachment 3**.

NYD = not yet determined

Flora and fauna

What investigations of flora and fauna in the project area have been done?
(provide overview here and attach details of method and results of any surveys for the project & describe their accuracy)

Offshore

A Preliminary Marine Assessment Report has been prepared (ERM, 2025b) (**Attachment 4**) which includes a desktop review of literature and publicly available information relating to the marine environmental features and values of the offshore portion of the Referral Area, including but not limited to:

- EPBC Act Protected Matters Search Tool, search undertaken with a 5 km buffer applied to the Referral Area.
- Australian Marine Spatial Information System for ecological features, biologically significant areas for protected species, and other marine conservation values.
- Species Profile and Threats Database for EPBC Act listed species and ecological communities including population and distribution, habitat, movements, feeding, reproduction and taxonomic comments.

- Victorian Biodiversity Atlas for records of threatened flora and fauna, and migratory species, undertaken with a 5 km buffer applied.
- Atlas of Living Australia for flora and fauna records within the Referral Area.
- Seamap Australia for marine habitat.
- Data and qualitative information from several Australian and State Government departments including DCCEEW, Victorian Fisheries Authority, Commonwealth Scientific and Industrial Research Organisation (**CSIRO**), Bureau of Meteorology (**BOM**), Australian Bureau of Agricultural and Resource Economics and Sciences (**ABARES**), and the Feature Activity Sensitivity Tool (**FeAST**).

Onshore

A Terrestrial Ecological Desktop Assessment has been prepared (ERM, 2025a) (**Attachment 3**). The following outlines the methodologies used to inform the desktop assessment (including but not limited to):

- EPBC Act Protected Matters Search Tool, undertaken with a 10 km buffer applied.
- Victorian Biodiversity Atlas for records of threatened flora and fauna, and migratory species, undertaken with a 10 km buffer applied.
- NatureKit for modelled location of EVCs and known threatened species.
- NVR Map, VicPlan and VicFlora for Native Vegetation Condition Scoring, and supporting information on habitat and distribution.

Have any threatened or migratory species or listed communities been recorded from the local area?

☐ NYD ☐ No ☒ Yes If yes, please:

- List species/communities recorded in recent surveys and/or past observations.
- Indicate which of these have been recorded from the project site or nearby.

Offshore

Threatened Flora (Marine)

No EPBC Act or FFG Act-listed flora species occur in the offshore portion of the Referral Area.

Marine Fauna

Threatened and migratory species identified as potentially occurring within the offshore portion of the Referral Area are listed in Table 3. A total of 49 FFG Act-listed threatened species, 55 EPBC-listed threatened species and 72 EPBC-listed migratory species have been identified with the potential to occur in the offshore portion of the Referral Area.

Table 3 EPBC and FFG Act Listed Fauna:

Scientific name	Common name	FFG Act Status**	EPBC Act Status**
Fish and Sharks			
Carcharias taurus	Grey Nurse Shark	CE	M
Carcharodon carcharias	White Shark	EN	VU, M
Galeorhinus galeus	School Shark	-	Conservation dependent
Isurus oxyrinchus	Shortfin Mako	-	M
Lamna nasus	Porbeagle	-	M
Rhincodon typus	Whale Shark	-	VU, M
Seriolella brama	Blue Warehou	Conservation dependent	Conservation dependent
Prototroctes maraena	Australian Grayling	EN	VU
Marine Mammals			
Potorous tridactylus	Long-nosed Fur Seal	VU	-

Balaenoptera borealis	Sei Whale	-	VU, M
Balaenoptera musculus	Blue Whale	EN*	EN, M
Balaenoptera physalus	Fin Whale	-	VU, M
Caperea marginata	Pygmy Right Whale	-	M
Eubalaena australis	Southern Right Whale	EN	EN, M (as *Balaena glacialis australis*)
Lagenorhynchus obscurus	Dusky Dolphin	-	M
Megaptera novaeangliae	Humpback Whale	CE (as *Megaptera novaeangliae australis*)	M
Orcinus orca	Killer Whale	-	M
Marine Turtles			
Caretta caretta	Loggerhead Turtle	-	EN, M
Chelonia mydas	Green Turtle	-	VU, M
Dermochelys coriacea	Leatherback Turtle	CE*	EN, M
Land Birds			
Accipiter novaehollandia	Grey Goshawk	EN	-
Heliaeetus leucogaster	White-bellied Sea-eagle	EN	M
Neophema chrysogaster	Orange-bellied Parrot	CE	CE
Lathamus discolor	Swift Parrot	CE	CE
Pandion haliaetus	Osprey	-	M
Apus pacificus	Fork-tailed Swift	-	M
Neophema chrysostoma	Blue-winged Parrot	-	VU
Hirundapus caudacutus	White-throated Needletail	VU*	VU, M
Motacilla flava	Yellow Wagtail	-	M
Shorebirds			
Actitis hypoleucos	Common Sandpiper	VU	M
Botaurus poiciloptilus	Australasian Bittern	CE	EN
Rostratula australis	Australian Painted Snipe	CE	EN
Gallinago megala	Swinhoe's Snipe	-	M
Gallinago stenura	Pin-tailed Snipe	-	M
Thinornis cucullatus cucullatus	Eastern Hooded Plover	VU	VU
Calidris acuminata	Sharp-tailed Sandpiper	-	VU, M
Limosa lapponica baueri	Nunivak Bar-tailed Godwit	-	EN
Limosa lapponica	Bar-tailed Godwit	VU	M
Limosa limosa	Black-tailed Godwit	CE	EN, M
Tringa nebularia	Common Greenshank	EN	EN, M
Calidris tenuirostris	Great Knot	CE	VU, M
Calidris canutus	Red Knot	EN	VU, M
Calidris ferruginea	Curlew Sandpiper	CE	CE, M
Calidris melanotos	Pectoral Sandpiper	-	M
Numenius phaeopus	Whimbrel	EN	M
Charadrius leschenaultii	Greater Sand Plover	VU*	VU, M
Charadrius bicinctus	Double-banded Plover	-	M
Pluvialis squatarola	Grey Plover	VU	VU, M
Charadrius veredus	Oriental Plover	-	M
Gallinago hardwickii	Latham's Snipe	-	VU, M
Charadrius mongolus	Lesser Sand Plover	EN	EN, M
Pluvialis fulva	Pacific Golden Plover	VU	M
Arenaria interpres	Ruddy Turnstone	EN	VU, M
Xenus cinereus	Terek Sandpiper	EN	VU, M
Tringa stagnatilis	Marsh Sandpiper	EN	M
Tringa glareola	Wood Sandpiper	EN*	M
Calidris alba	Sanderling	-	M
Calidris pugnax	Ruff	-	M
Tringa brevipes	Grey-tailed Tattler	CE	M
Calidris ruficollis	Red-necked Stint	-	M
Numenius minutus	Little Curlew	-	M
Seabirds			
Sternula nereis nereis	Australian Fairy Tern	CE	VU
Sternula albifrons	Little Tern	CE	VU, M
Ardenna grisea	Sooty Shearwater	-	VU, M
Ardenna carneipes	Flesh-footed Shearwater	-	M
Diomedea antipodensis	Antipodean Albatross	-	VU, M

Diomedea antipodensis gibsoni	Gibson's Albatross	-	VU
Diomedea epomophora	Southern Royal Albatross	CE	VU, M
Diomedea exulans	Wandering Albatross	CE*	VU, M
Diomedea sanfordi	Northern Royal Albatross	-	EN, M
Fregetta grallaria grallaria	White-bellied Storm-Petrel (Tasman Sea)	-	VU
Halobaena caerulea	Blue Petrel	-	VU
Hydroprogne caspia	Caspian Tern	VU	M
Gelochelidon macrotarsa	Australian Gull-billed Tern	EN	M
Macronectes giganteus	Southern Giant-Petrel	EN*	EN, M
Macronectes halli	Northern Giant Petrel	EN*	VU, M
Numenius madagascariensis	Eastern Curlew	CE	CE, M
Pachyptila turtur subantarctica	Fairy Prion (southern)	-	VU
Phoebetria fusca	Sooty Albatross	CE*	VU, M
Pterodroma leucoptera leucoptera	Gould's Petrel	-	EN
Thalassarche bulleri	Buller's Albatross	EN*	VU, M
Thalassarche bulleri platei	Northern Buller's Albatross	-	VU
Thalassarche carteri	Indian Yellow-nosed Albatross	EN*	VU, M
Thalassarche cauta	Shy Albatross	EN	EN, M
Thalassarche chrysostoma	Grey-headed Albatross	EN*	EN, M
Thalassarche impavida	Campbell Albatross	-	VU, M
Thalassarche melanophris	Black-browed Albatross	-	VU, M
Thalassarche salvini	Salvin's Albatross	-	VU, M
Thalassarche steadi	White-capped Albatross	-	VU, M
Puffinus tenuirostris	Short-tailed Shearwater	-	M
Thalasseus bergii	Greater Crested Tern	-	M

* Species not listed as Threatened or Migratory under the EPBC Act or FFG Act, however, has a likelihood of occurring within the Referral Area based on known breeding habitat nearby.
**FFG/EPBC Act definitions: M = Migratory, VU = Vulnerable, EN = Endangered, CE = Critically Endangered.

Threatened ecological communities

One marine threatened ecological community, the *Subtropical and Temperate Coastal Saltmarsh* has a likelihood to occur within the offshore portion of the Referral Area. The subtropical and temperate coastal saltmarsh ecological community is mainly associated with the soft substrate shores of estuaries and embayments and not the open ocean shorelines. As such this community is not anticipated to occur in the offshore component of the ECC.

Onshore

Threatened Flora

The desktop assessment (**Attachment 3**) identified 35 FFG Act listed flora species and 10 EPBC-listed flora species with the potential to occur within the onshore portion of the Referral Area, with 7 of these listed under EPBC Act and FFG Act. These species are provided below in Table 4 and Table 5.

Table 4 FFG Act Listed Flora:

Scientific name	Common name	FFG Act Status**
Acacia howittii	Sticky Wattle	VU
Althenia marina	Sea Water-mat	EN
Astrotricha parvifolia subsp. 1	Small-leaf Star-hair	CE
Austrostipa rudis subsp. *australis*	Veined Spear-grass	EN
Avicennia marina subsp. *australasica*	Grey Mangrove	EN
Bossiaea heterophylla	Variable Bossiaea	EN
Caladenia aurantiaca	Orange-tip Finger-orchid	EN
*Caladenia orientalis**	Eastern Spider Orchid	EN
Calochilus imberbis	Naked Beard-orchid	CE
*Commersonia prostrata**	Dwarf Kerrawang	EN
Coronidium gunnianum	Pale Swamp Everlasting	CE

Corybas fimbriatus	Fringed Helmet-orchid	EN
*Dianella amoena**	Matted Flax-lily	CE
Dianella longifolia var. *grandis s.l.*	Glaucous Flax-lily	CE
Diuris punctata var. *punctata*	Purple Diuris	EN
Eucalyptus arenicola	Gippsland Lakes Peppermint	CE
Eucalyptus bosistoana	Coast Grey-box	EN
Eucalyptus kitsoniana	Bog Gum	CE
Grevillea chrysophaea	Golden Grevillea	VU
Juncus revolutus	Creeping Rush	EN
Lachnagrostis robusta	Salt Blown-grass	EN
Lachnagrostis semibarbata var. *filifolia*	Purple Blown-grass	EN
Lachnagrostis semibarbata var. *semibarbata*	Purple Blown-grass	EN
Lawrencia spicata	Salt Lawrencia	EN
Leptorhynchos elongatus	Lanky Buttons	EN
Oxalis rubens	Dune Wood-sorrel	EN
Pomaderris apetala subsp. *maritima*	Tasman Pomaderris	EN
*Prasophyllum frenchii**	Maroon Leek-orchid	EN
*Prasophyllum spicatum**	Dense Leek-orchid	CE
Pseudanthus ovalifolius	Oval-leaf Pseudanthus	VU
*Pterostylis chlorogramma**	Green-striped Greenhood	EN
Pterostylis fischiorum	Fisch's Greenhood	EN
Pterostylis grandiflora	Cobra Greenhood	EN
*Thelymitra epipactoides**	Metallic Sun-orchid	EN
Zieria veronicea subsp. veronicea	Pink Zieria	EN

*Also listed under the EPBC Act.
**FFG Act definitions: VU = Vulnerable, EN = Endangered, CE = Critically Endangered.

Table 5 EPBC Act Listed Flora:

Scientific name	Common name	EPBC Act Status**
Amphibromus fluitans	River Swamp Wallaby-grass	VU
*Caladenia orientalis**	Eastern Spider Orchid	EN
Caladenia tessellata	Thick-lipped Spider-orchid	VU
*Commersonia prostrata**	Dwarf Kerrawang	EN
*Dianella amoena**	Matted Flax-lily	EN
Dodonaea procumbens	Trailing Hop-bush	VU
*Prasophyllum frenchii**	Maroon Leek-orchid	EN
Prasophyllum spicatum	Dense Leek-orchid	VU
*Pterostylis chlorogramma**	Green-striped Greenhood	VU
*Thelymitra epipactoides**	Metallic Sun-orchid	EN

*Also listed under the FFG Act.
**EPBC Act definitions: VU = Vulnerable, EN = Endangered, CE = Critically Endangered.

Threatened and Migratory Fauna

The desktop assessment (**Attachment 3**) identified 57 FFG Act-listed fauna species, 34 EPBC Act-listed threatened fauna species with the potential to occur within the onshore portion of the Referral Area. These species are provided below in Table 6 and Table 7. In addition to fauna species listed as threatened under the EPBC Act, 22 listed migratory species were also determined to have the potential to occur in the Referral Area. These are presented in Table 8.

Table 6 FFG Act Listed Threatened Fauna:

Scientific name	Common name	FFG Act Status**
Accipiter novaehollandiae	Grey Goshawk	EN
*Actitis hypoleucos**	Common Sandpiper	VU
Anseranas semipalmata	Magpie Goose	VU
Ardea alba modesta	Eastern Great Egret	VU
*Ardea intermedia plumifera**	Plumed Egret	CE
*Arenaria interpres**	Ruddy Turnstone	EN
Biziura lobata	Musk Duck	VU
*Botaurus poiciloptilus**	Australasian Bittern	CE
*Calamanthus pyrrhopygius**	Chestnut-rumped Heathwren	VU
*Calidris canutus**	Red Knot	EN

*Calidris ferruginea**	Curlew Sandpiper	CE
*Calidris tenuirostris**	Great Knot	CE
*Callocephalon fimbriatum**	Gang-gang Cockatoo	EN
*Charadrius leschenaultia**	Greater Sand Plover	VU
*Charadrius mongolus**	Lesser Sand Plover	EN
Egretta garzetta	Little Egret	EN
Galaxiella pusilla	Dwarf Galaxias	EN
Gelochelidon macrotarsa	Australian Gull-billed Tern	EN
Haliaeetus leucogaster	White-bellied Sea-Eagle	EN
Hieraaetus morphnoides	Little Eagle	VU
*Hirundapus caudacutus**	White-throated Needletail	VU
*Hydroprogne caspia**	Caspian Tern	VU
*Ixobrychus dubius**	Australian Little Bittern	EN
*Lathamus discolor**	Swift Parrot	CE
Lewinia pectoralis	Lewin's Rail	VU
*Limosa lapponica**	Bar-tailed Godwit	VU
*Limosa limosa**	Black-tailed Godwit	CE
*Lissolepis coventryi***	Swamp Skink	EN
*Litoria raniformis**	Growling Grass Frog	VU
Nannoperca sp. 1	Flinders Pygmy Perch	VU
*Neophema chrysogaster**	Orange-bellied Parrot	CE
Ninox connivens	Barking Owl	CE
Ninox strenua	Powerful Owl	VU
*Numenius madagascariensis**	Eastern Curlew	CE
*Numenius phaeopus**	Whimbrel	EN
Oxyura australis	Blue-billed Duck	VU
Petaurus australis australis	Yellow-bellied Glider	VU
*Petauroides volans**	Southern Greater Glider	EN
Pezoporus wallicus	Ground Parrot	EN
Pluvialis fulva	Pacific Golden Plover	VU
*Pluvialis squatarola**	Grey Plover	VU
Pseudemoia rawlinsoni	Glossy Grass Skink	EN
*Pseudomys novaehollandiae**	New Holland Mouse	EN
Pseudophryne semimarmorata	Southern Toadlet	EN
*Pteropus poliocephalus**	Grey-headed Flying-fox	VU
*Rostratula australis**	Australian Painted Snipe	CE
Spatula rhynchotis	Australasian Shoveler	VU
*Sternula albifrons**	Little Tern	CE
*Sternula nereis**	Fairy Tern	CE
Stictonetta naevosa	Freckled Duck	EN
*Thinornis cucullatus**	Hooded Plover	VU
*Tringa brevipes**	Grey-tailed Tattler	CE
*Tringa nebularia**	Common Greenshank	EN
*Tringa stagnatilis**	Marsh Sandpiper	EN
*Uperoleia martini**	Martin's Toadlet	CE
Varanus varius	Lace Monitor	EN
Xenus cinereus	Terek Sandpiper	EN

*Also listed under the EPBC Act.
**FFG Act definitions: VU = Vulnerable, EN = Endangered, CE = Critically Endangered.

Table 7 EPBC Act Listed Threatened Fauna:

Scientific name	Common name	EPBC Act Status**
Ardenna grisea	Sooty Shearwater	VU
*Arenaria interpres**	Ruddy Turnstone	VU
*Botaurus poiciloptilus**	Australasian Bittern	EN
Calidris acuminata	Sharp-tailed Sandpiper	VU
*Calidris canutus**	Red Knot	VU
*Calidris ferruginea**	Curlew Sandpiper	CE
*Calidris tenuirostris**	Great Knot	VU
*Callocephalon fimbriatum**	Gang-gang Cockatoo	EN
*Charadrius leschenaultia**	Greater Sand Plover	VU
*Charadrius mongolus**	Lesser Sand Plover	EN
Galaxiella pusilla*	Dwarf Galaxias	EN
Gallinago hardwickii	Latham's Snipe	VU

*Hirundapus caudacutus**	White-throated Needletail	VU
*Lathamus discolor**	Swift Parrot	CE
*Limosa lapponica**	Bar-tailed Godwit	EN
*Limosa limosa**	Black-tailed Godwit	EN
*Lissolepis coventryi**	Swamp Skink	EN
*Litoria aurea**	Green and Golden Bell Frog	VU
*Litoria raniformis**	Growling Grass Frog	VU
*Neophema chrysogaster**	Orange-bellied Parrot	CE
Neophema chrysostoma	Blue-winged Parrot	VU
*Numenius madagascariensis**	Eastern Curlew	CE
*Petauroides volans**	Southern Greater Glider	EN
Petaurus australis australis	Yellow-bellied Glider (south-eastern)	VU
*Pluvialis squatarola**	Grey Plover	VU
*Pseudomys novaehollandiae**	New Holland Mouse	VU
*Pteropus poliocephalus**	Grey-headed Flying-fox	VU
*Pycnoptilus floccosus**	Pilotbird	VU
*Rostratula australis**	Australian Painted Snipe	EN
*Sternula nereis**	Fairy Tern	VU
*Thinornis cucullatus**	Hooded Plover	VU
*Tringa nebularia**	Common Greenshank	EN
*Uperoleia martini**	Martin's Toadlet	EN
*Xenus cinereus**	Terek Sandpiper	VU

*Also listed under the FFG Act.
**EPBC Act definitions: VU = Vulnerable, EN = Endangered, CE = Critically Endangered.

Table 8 EPBC Act Listed Migratory Fauna:

Scientific name	**Common name**
Actitis hypoleucos	Common Sandpiper
Ardenna grisea	Sooty Shearwater
Arenaria interpres	Ruddy Turnstone
Calidris acuminata	Sharp-tailed Sandpiper
Calidris canutus	Red Knot
Calidris tenuirostris	Great Knot
Charadrius bicinctus	Double-banded Plover
Charadrius leschenaultia	Greater Sand Plover
Charadrius mongolus	Lesser Sand Plover
Gallinago hardwickii	Latham's Snipe
Hirundapus caudacutus	White-throated Needletail
Hydroprogne caspia	Caspian Tern
*Limosa lapponica**	Bar-tailed Godwit
Limosa limosa	Black-tailed Godwit
Numenius madagascariensis	Eastern Curlew
Numenius phaeopus	Whimbrel
Pluvialis squatarola	Grey Plover
Sternula albifrons	Little Tern
Tringa brevipes	Grey-tailed Tattler
Tringa nebularia	Common Greenshank
Tringa stagnatilis	Marsh Sandpiper
Xenus cinereus	Terek Sandpiper

Threatened Ecological Communities

The desktop assessment (**Attachment 3**) identified that the onshore portion of the Referral Area has the potential to support two ecological communities listed under the FFG Act:

- *Coastal Moonah Woodland* - this community is congruent with the presence of EVC 1 - Coastal Dune Scrub/Coastal Dune Grassland Mosaic. It is characterised by an open grassy woodland that is dominated by Moonah (*Melaleuca lanceolata subsp. lanceolata*) and found along parts of the Victorian coastline. This community tends to occur on high-level dunes along the coast where soils are strongly alkaline and developed on moderately organic aeolian sands or on dune calcarenites.
- *Central Gippsland Plains Grassland* - this community is congruent with the presence of EVC 687 – Swamp Scrub/ Plains Grassland Mosaic. It is characterised by a community

dominated by Kangaroo Grass (*Themeda triandra*) and includes a range of native herbs including Golden Weather-glass (*Hypoxis hygrometrica*), Common Everlasting (*Chrysocephalum apiculatum*), Yellow Rush-lily (*Tricoryne elatior*), and Common Rice-flower (*Pimelea humilis*). Trees are rare although, in some places, there are thickets of Drooping She-oak (*Allocasuarina verticillata*), Burgan (*Kunzea sp*.), and saplings of Forest Red-gum (*Eucalyptus tereticornis*). The community is extremely restricted in distribution it is estimated that less than 20 to 30 ha remain.

If known, what threatening processes affecting these species or communities may be exacerbated by the project? (eg. loss or fragmentation of habitats) Please describe briefly.

Offshore

The following threatened processes listed in the *Flora and Fauna Guarantee Act 1988 – Potentially Threatening Processes List* (DELWP, 2023) that are relevant to offshore ecology have been evaluated in relation to the Project.

Habitat fragmentation as a threatening process for fauna in Victoria

The installation of marine infrastructure has the potential to cause temporary disturbance to marine habitats, which could lead to habitat fragmentation in nearshore waters. However, the anticipated footprint of disturbance within the ECC investigation area (offshore) is small when considered against the broader extent of available habitat along the Gippsland coast. Given the mobility of most marine fauna and the wide distribution of similar habitat types, the Project is considered unlikely to result in significant fragmentation or long-term reduction of marine habitats or communities.

Input of petroleum and related products into Victorian marine and estuarine environments

Accidental spills from unplanned events such as vessel collisions grounding or refuelling incidents could impact marine and estuarine environments. While these events can occur, with the implementation of the legislative and standard control measures, the likelihood of a substantial spill from Project activities is low.

The discharge of human-generated marine debris into Victorian marine or estuarine waters

Marine debris, including waste materials or lost construction items, has the potential to adversely affect marine ecosystems through smothering, ingestion or entanglement by fauna. However, no planned discharge of human-generate debris will occur as part of the Project. Established waste management procedures, equipment storage and handling protocols, and procedures to recover dropped objects or materials where practicable will be implemented. With these controls in place, the Project is considered unlikely to contribute to marine debris or result in significant impacts to Victorian marine or estuarine environments.

The introduction of exotic organisms into Victorian marine waters

There are two key vectors for introduced marine species, biofouling of the vessel hull, or the release of pests into the marine environment via ballast water exchange. The risk of introduction or spread of these is expected to be minimal, assuming the implementation of industry standard mitigation measures (use of local vessels where practicable, ballast water management, adherence to legislative requirements for biofouling).

Onshore

The following threatening processes listed in the *Flora and Fauna Guarantee Act 1988 – Potentially Threatening Processes List* (DEWLP, 2023) that are relevant to onshore ecology have been evaluated in relation to the Project.

Habitat fragmentation as a threatening process for fauna in Victoria and Invasion of native vegetation by environmental weeds.

The removal of native vegetation and the potential spread of viruses/diseases from construction activities may result in impacts to threatened fauna species that rely on vegetation within the Referral Area. This can in turn impact opportunities for fauna species to forage and breed depending on the location and severity of the fragmentation. However, as the Project design progresses and through further assessment, it is likely that vegetation removal can be avoided or minimised.

Through project siting and with the introduction of construction and operational management and mitigation measures, the impacts described above are likely to be avoided or reduced. Where effects on threatened species and communities cannot be avoided, appropriate environmental management measures in both construction and operations would be detailed in the Project's construction and operational environmental management plans. Specific mitigation measures may be developed to address any residual impacts, which would also be offset in accordance with the FFG Act.

Increase in sediment input into Victorian rivers and streams due to human activities

Excavation and general construction activities may result in sediment input into Victorian rivers and streams. Construction design and mitigation measures will be implemented to avoid and minimise sediment input, including the use of trenchless construction under waterways, where possible. Best practice construction procedures and appropriate sediment control measures will be implemented via the Project's construction environmental management plans. With these measures in place, the Project is considered unlikely to result in significant sediment-related impacts.

Wetland loss and degradation as a result of change in water regime, dredging, draining, filling and grazing

Several waterways are present within the Referral Area, and the Project is adjacent to the Corner Inlet Ramsar site. No dredging, draining or filling of wetlands is proposed. Potential interactions with waterways and wetlands will be further identified and assessed once the final cable corridor is determined. The Project will be designed to avoid or minimise impacts on water regimes, wetlands and waterways. With these measures in place, the Project is considered unlikely to result in significant wetland loss or degradation.

Are any threatened or migratory species, other species of conservation significance or listed communities potentially affected by the project?

☐ NYD ☐ No ☒ Yes If yes, please:

- List these species/communities:
- Indicate which species or communities could be subject to a major or extensive impact (including the loss of a genetically important population of a species listed or nominated for listing) Comment on likelihood of effects and associated uncertainties, if practicable.

The species listed in Table 3 to 8 may potentially be affected by the Project within marine and terrestrial environments.

Offshore

The Preliminary Marine Assessment Report (ERM, 2025b) (**Attachment 4**) identified threatened marine species considered to have the potential to occur within the Referral Area, including 49 FFG Act-listed threatened species, 55 EPBC-listed threatened species and 72 EPBC-listed migratory species comprising of:

- 3 fish and shark species (Whale Shark, White Shark, Australian Grayling)
- 4 cetacean species (Blue Whale, Southern Right Whale, Fin Whale, Sei Whale)
- 3 marine turtle species (Leatherback Turtle, Loggerhead Turtle, Green Turtle)
- 45 bird species (4 land birds, 16 shorebirds and 25 seabirds).

Onshore

Terrestrial Ecological Desktop Assessment (ERM, 2025a) (**Attachment 3**) identified terrestrial species within the Referral Area including:

- 35 FFG Act listed flora species and 10 EPBC-listed flora species.
- 2 threatened ecological communities.
- 57 FFG Act-listed fauna species, 34 EPBC Act-listed threatened fauna species and 22 EPBC Act-listed migratory fauna species comprising of:
    - 61 birds
    - 10 mammals
    - 4 fish
    - 5 amphibians
    - 3 reptiles.

It is not yet known whether there are additional species of conservation significance or listed communities other than those already identified by desktop assessments. Further site investigations and targeted assessments will be conducted to ground truth the current desktop assessment findings and to further inform the potential presence of listed species and communities in the Referral Area.

Is mitigation of potential effects on indigenous flora and fauna proposed?

☒ NYD ☒ No ☒ Yes If yes, please briefly describe.

The primary means of mitigating potential effects on indigenous flora and fauna would be avoidance and minimisation of impacts through siting and design. The results of terrestrial and marine ecological surveys will be incorporated into design and development to ensure constraints are considered early in development. Mitigation measures may include:

- Detailed fauna and habitat suitability surveys. Outcomes of surveys will inform Project design, construction methodology as well as inform the development of the Project's construction and operational environmental management plans, as relevant.
- Bird surveys for marine, migratory and shorebird species to assess if a significant proportion of a population of a species within the Referral Area. This will include collision risk modelling to understand the potential impacts associated with blade strike during the operational phase of the OWF.
- Avoiding/minimising alignment of onshore Project infrastructure in areas of native vegetation and in areas that contain acid sulphate soils or provide habitat for migratory and threatened species and ecological communities.
- Implementation of trenchless construction techniques, such as HDD, where feasible in specific locations to avoid/minimise impacts to areas that contain acid sulphate soils and habitats for migratory and threatened species.
- Managing construction and operational activities through the Project's construction and operational environmental management plans, to minimise environmental impacts. This is anticipated to include management measures in accordance with EPA Publication 1834.1 to minimise the risk of indirect impacts to flora and fauna as a result of noise, waste water and water runoff, dust generation and waste management.

Other information/comments? (eg. accuracy of information)

The information in this section is based on desktop assessment only. The Project's understanding of potential impacts will be further informed by the results of terrestrial and marine surveys. Potential impacts will be assessed once siting and design is confirmed.

The preliminary desktop search results for offshore and onshore include some species that have been counted multiple times (e.g., in the onshore and the offshore results and those listed as both threatened and migratory species under the EPBC Act and FFG Act).

13. Water environments

Will the project require significant volumes of fresh water (eg. > 1 Gl/yr)?

☐ NYD ☒ No ☐ Yes If yes, indicate approximate volume and likely source.

Will the project discharge waste water or runoff to water environments?

☐ NYD ☒ No ☐ Yes If yes, specify types of discharges and which environments.

While there is the potential for small volumes of runoff from construction sites during construction, onshore construction activities would be managed in accordance with EPA Publication 1834.1 *Civil construction, building and demolition guide* (EPA 2023) to minimise the risk of impacts to waterways resulting from erosion and sedimentation.

Throughout the Project lifecycle, small-scale and planned discharges from Project vessels may occur, but these would be managed in accordance with relevant legislation (e.g., MARPOL).

Are any waterways, wetlands, estuaries or marine environments likely to be affected?

☐ NYD ☐ No ☒ Yes If yes, specify which water environments, answer the following questions and attach any relevant details.

In addition to the marine environment, there are a number of surface water environments within or in close proximity to the onshore portion of the Referral Area, including:

- Jack Smith Lake
- Warrigal Creek
- Sunville Creek
- Morris Creek
- Bruthen Creek.

Refer to **Figure 1-3** of **Attachment 1** (Parks, Reserves, Waterways and Wetlands).

The Bureau of Meteorology (**BoM**) maps all potential aquatic and terrestrial groundwater dependent ecosystems (**GDEs**) in its Groundwater Dependent Atlas. Within the Referral Area, the atlas shows terrestrial GDE with varying potential to occur, high along the coast and deceasing to low further inland. Aquatic GDE is also mapped to occur within the Referral Area, with high potential and low potential inland associated with the Bruthen Creek. The potential impact to GDEs within the Referral Area will be investigated further as the Project design develops and progresses.

Onshore, the Project would seek to reduce potential impacts by locating as much of the onshore development footprint as possible within existing cleared land and avoiding the crossing of wetlands and waterways so far as is reasonably practicable. In addition, with the implementation of measures such as trenchless construction (e.g., HDD) to reduce impacts, onshore (inland) water environments are not expected to be directly impacted by the Project.

The installation of cables and structures within the offshore portion of the Referral Area have the potential to cause habitat loss, create turbidity, disturb contaminated material and increase the risk of chemical spills. Further design development is required to identify the preferred cable corridor and to determine the potential environmental effects. However, potential effects during construction and operation are expected to be short term, limited to the locality of disturbance and can be managed through the standard construction environmental management measures, such as those outlined in EPA Publication 1834.1.

Are any of these water environments likely to support threatened or migratory species?

☐ NYD ☐ No ☒ Yes If yes, specify which water environments.

Offshore and coastal habitat

The Project is located within the South-east Marine Region (**SEMR**) of Bass Strait. Bass Strait is considered to be an area of high important for a large number of marine species for breeding, foraging and migrating. The Preliminary Marine Assessment Report (ERM, 2025b) (**Attachment 4**) identified the following may potentially occur in the Referral Area:

- Southern Right Whale (Reproduction and Migration).
- Pygmy Blue Whale (Foraging).
- White Sharks (Breeding (nursery area)).
- 3 seabirds and migratory shorebirds (including Shy Albatross (Foraging), Short-tailed Shearwater (Foraging) and Common Diving-Petrel (Foraging).

Terrestrial habitat

Several wetlands and waterways within or in proximity to the Referral Area are of high value to a range of shorebirds and other wetland birds. Of note in the wider area are the Jack Smith Lake Wildlife Reserve and Corner Inlet Ramsar site adjacent to the Referral Area to the south-east. Both habitats support high biodiversity of fauna and flora species. The Jack Smith Lake Wildlife Reserve is recorded to support the Matted Flax-lily, Ruddy Turnstone, Musk Duck and Sharp-tailed Sandpiper. The Corner Inlet Ramsar site supports especially birds with 32 wader species recorded and, and nationally threatened fauna such the Orange-bellied Parrot, Growling Grass Frog, Australian Grayling, and Swift Parrot utilising the site. The Referral Area has been positioned to avoid direct overlap with these sensitive water environments.

Are any potentially affected wetlands listed under the Ramsar Convention or in 'A Directory of Important Wetlands in Australia'?

☐ NYD ☒ No ☐ Yes If yes, please specify.

No Ramsar Wetlands are located within the Referral Area, however, there are two Ramsar sites in the vicinity of the Referral Area: Gippsland Lakes and Corner Inlet. The Gippsland Lakes Ramsar Site is approximately 8 km north-east of the Referral Area along the Gippsland coastline and the Corner Inlet Ramsar site boundary abuts the south-western extent of the Referral Area. No nationally important wetlands are within the Referral Area. Two Nationally Important Wetlands are in proximity to the Referral Area: Jack Smith Lake Wildlife Reserve and Corner Inlet, both of which are adjacent to the Referral Area.

Refer to **Figure 1-3** of **Attachment 1** (Parks, Reserves, Waterways and Wetlands).

Impacts to Gippsland Lakes Ramsar Site are considered unlikely given the distance (8 km to the north-east) from potential works and the lack of hydrological connectivity to the Referral Area. Similarly the Jack Smith Lake Wildlife Reserve is situated outside the Referral Area.

Corner Inlet Ramsar site is outside the Referral Area. Its northern most boundary is located adjacent to the Referral Area where the Offshore ECC investigation area meets the Onshore ECC investigation area (at the south-western boundary of the Referral Area).

The Referral Area represents a broad investigation area for siting infrastructure and provides two options for routing of the ECC, a north-eastern option and a south-western option and corresponding options for potential shore crossing locations at either McGaurans Beach or Reeves Beach, respectively. No project infrastructure would be located within the Ramsar site and no direct impacts are expected.

Should the north-eastern ECC and McGaurans Beach crossing location option be selected, following the outcome of further environmental and technical investigations onshore and offshore and further design development, the nearest infrastructure would be located greater than 15 km from the Ramsar Site.

Should the south-western ECC and Reeves Beach crossing location option be selected, the nearest infrastructure would be located at least 2 km from the Corner Inlet Ramsar site, and any indirect construction related impacts associated with installation of the export cables can be managed through application of standard construction environmental management measures such as those required for compliance with other legislation (e.g., to comply with the general environmental duty under the Victorian *Environment Protection Act 2017*). This includes measures for erosion and sediment control, waste and wastewater management, contaminated land and groundwater management (including for potential acid sulfate soils) and measures for surface water management.

Potential indirect impacts from offshore works during cable installation are also considered manageable through standard environmental management measures. Potential water quality impacts would be managed in accordance with Australian and international maritime legislation (e.g., MARPOL) and, given the dynamic open coast and ocean environment of the Referral Area (i.e., a highly dispersive environment due to prevailing tides, currents and waves), any discharges and spills are expected to rapidly disperse relatively close to the point of discharge, hence, any effects would be temporary and highly localised. Potential impacts from invasive marine species would be managed in accordance with legislated biosecurity requirements.

With these standard measures in place, potential environmental impacts to the Ramsar site associated with the Project and construction activities such as cable installation are expected to be highly localised and temporary. Indirect impacts to the Ramsar Site are not expected.

Could the project affect streamflows?

☐ NYD ☒ No ☐ Yes If yes, briefly describe implications for streamflows.

The Project is not expected to affect streamflows. The location of the cable corridor is not yet confirmed, however, the Project would employ trenchless construction methods where practicable, such as HDD, to reduce the potential for impacts to streamflows.

Could regional groundwater resources be affected by the project?

☒ NYD ☐ No ☐ Yes If yes, describe in what way.

The Project is not expected to affect regional groundwater resources given trenching for the onshore export cables would be shallow (e.g., 0.5 – 5 m deep, subject to ground conditions).

Further groundwater assessment will be undertaken to understand existing groundwater reserves and aquifers within the Referral Area and to inform construction methods, including trenchless construction methods.

Any potential impacts to groundwater where it is encountered is expected to be localised and temporary. The Project's construction and operational environmental management plans would be prepared to also include drainage controls and to mitigate against the risk of accidental spills and provide adequate remedial actions in the case of impacts to groundwater quality, as relevant.

Could environmental values (beneficial uses) of water environments be affected?

☐ NYD ☒ No ☐ Yes If yes, identify waterways/water bodies and beneficial uses (as recognised by State Environment Protection Policies)

The cable corridor is not yet confirmed, however, it is not expected that the Project would affect environmental values of water environments. Waterway crossings would be avoided so far as is reasonably practicable and, where unavoidable, they would be designed to minimise impacts (e.g., through trenchless construction methods).

The potential impacts on environmental values (beneficial uses) of water environments, as defined in the Environment Reference Standard (**ERS**) under the *Environment Protection Act 2017*, have not yet been determined. Further investigations will be undertaken to understand the environmental values of aquatic environments within the Referral Area and construction works would be managed under a construction environmental plan containing controls developed in accordance with EPA Publication 1834.1.

Could aquatic, estuarine or marine ecosystems be affected by the project?

☒ NYD ☒ No ☒ Yes If yes, describe in what way.

There are a number of surface water environments as well as marine environment as within the Referral Area including:

- Jack Smith Lake
- Warrigal Creek
- Sunville Creek
- Morris Creek
- Merriman Creek

A number of Victorian-designated MKEFs are located in the vicinity of the Referral Area. These are associated with the Corner Inlet Ramsar site and include:

- Nooramunga Channels (Tier 3 – Significant; Channels with tide streams supporting Posidonia seagrass and sandy bed habitats.)
- Nooramunga Upper Sand Banks and Seagrass (Tier 3 – Significant; Significant shore and wetland bird populations feeding and roosting on upper littoral sediments).
- Nooramunga Wetland Islands (Tier 3 – Significant; Wetland islands consisting of mangroves and saltmarsh vegetation. The islands influence hydrodynamic processes and provide habitat for wetland birds).
- Clonmel Ocean Beaches and Entrance (Tier 3 – Significant; Shorebird habitat including seabird roosts)
- Nooramunga Lower Sand and Seagrass Beds (Tier 1 – Flagship; Sediment banks on the sides of tidal channels supporting seagrass beds and sediment beds. Feeding grounds for wetland and migratory shore birds.)

Onshore, potential impacts may include direct habitat loss and indirect impacts to water quality such as turbidity. The Project design will seek to avoid mapped surface waterways as far as is reasonably practicable and any waterway crossings will be designed in accordance with industry standards and a Works on Waterways permit will be required for these works prior to construction.

Offshore water and sediment quality may also be affected during construction activities, however, these impacts are expected to be localised, short-term, and are not expected to compromise the integrity of marine ecosystems.

Is there a potential for extensive or major effects on the health or biodiversity of aquatic, estuarine or marine ecosystems over the long-term?

☒ No ☒ Yes If yes, please describe. Comment on likelihood of effects and associated uncertainties, if practicable.

Extensive and major effects on the diversity of species or the diversity of aquatic, estuarine or marine ecosystems in the Referral Area are not expected over the long-term.

Potential impacts will primarily be associated with seabed disturbance during cable installation, and impacts from the presence of vessels. It is likely that any disturbance would be local and is not expected to have extensive or major effects. Marine ecosystems may benefit from the presence of subsea infrastructure in the long-term, by creating hard substrate for benthic fauna to colonise.

Is mitigation of potential effects on water environments proposed?

☒ NYD ☒ No ☒ Yes If yes, please briefly describe.

The Project is committed to best practice environmental management in detailed design, construction, operations and decommissioning. Where effects on water environments cannot be

avoided, best practice environmental management and mitigation measures in both construction and operations would be detailed in the Project's construction and operational environmental management plans. Specific mitigation measures may be developed to address any residual effects.

Proposed mitigation and management measures for terrestrial water environments include:

- Avoiding/minimising crossings of waterways for onshore transmission alignment.
- Employing trenchless construction techniques such as HDD for shore crossings to avoid/minimise impacts to land stability and areas that contain acid sulphate soils and/or highly erodible soils, and habitats for migratory and threatened species.
- Managing construction and operational activities through environmental management plans to minimise impacts on land stability, acid sulphate soils and/or highly erodible soils, and habitats for migratory and threatened species and ecological communities.

Proposed mitigation strategies and approaches for marine aquatic environments include:

- Benthic habitat surveys to inform cable corridor selection to avoid sensitive habitats and ecological communities, where possible.
- Vessel waste and discharges will be managed in accordance with Australian and international maritime legislation (e.g., MARPOL).
- Limit lighting on vessels during construction, maintenance and decommissioning to that required for safe operations.
- Project's construction environmental management plan to account for shoreline crossing activities located near sensitive populations.
- Standard ballast water management measures.

Further mitigation strategies will be developed following detailed environmental assessment including the collection of site-specific baseline data (e.g., benthic habitats and communities).

Other information/comments? (eg. accuracy of information)

Given this assessment is based on desktop assessment only, precautionary approach has been taken. Additional assessments are required to inform project design and development before potential impacts can be fully understood.

14. Landscape and soils

Landscape

Has a preliminary landscape assessment been prepared?

☐ No ☒ Yes If yes, please attach.

A Preliminary Landscape and Visual Impact Appraisal has been undertaken for the Project (Hansen Partnership, 2025) (**Attachment 5**). Three representative view locations were assessed to determine whether a landscape and visual impact would occur as a result of the proposed OWF area. The preliminary appraisal identified that the wind farm would be visible from Golden beach (33 km from OWF area), Seaspray beach (25 km from OWF area) and Woodside beach (25 km from OWF area).

A detailed landscape and visual assessment will be undertaken to determine the potential to affect landscape values and evaluate effects of planned onshore infrastructure once Project design has been progressed.

Is the project to be located either within or near an area that is:

- **Subject to a Landscape Significance Overlay or Environmental Significance Overlay?**

☐ NYD ☐ No ☒ Yes If yes, provide plan showing footprint relative to overlay.

While the placement of onshore infrastructure is yet to be determined, **Figure 1-5** in **Attachment 1** shows that land within the Referral Area is subject to an Environmental Significance Overlays pursuant to the Wellington Planning Scheme including:

- Environmental Significance Overlay Schedule 1 (Coastal and Gippsland Lakes Environs) – aims to ensure that the development of land is compatible with the environmentally sensitive coastal area, including the Gippsland Lakes.
- Environmental Significance Overlay Schedule 2 (Wetlands) – aims to protect and enhance the ecological, habitat, aesthetic, scientific, floristic, faunal, cultural, educational, and recreation values of wetlands.

- **Identified as of regional or State significance in a reputable study of landscape values?**
  ☐ NYD ☐ No ☒ Yes If yes, please specify.

Subject to the location of the VicGrid Connection Hub, the Project's onshore infrastructure may potentially be located near or parallel to the Ninety Nile Beach.

The Coastal Spaces Landscape Assessment Study (Planisphere, 2006) was prepared for the Victorian State Government in 2006. This study identifies Ninety Mile Beach Coast as a landscape of State significance, for the following reasons:

- Potentially of National Significance in the National context.
- Visually significant as the longest stretch of uninterrupted beach in the country.
- Characterised by sandy beaches, low dunes, peninsulas and wetlands set against the wild seas of Bass Strait.
- Valued by the community for the intact indigenous coastal vegetation and scenic ocean views.

- **Within or adjoining land reserved under the *National Parks Act 1975* ?**
  ☐ NYD ☐ No ☒ Yes If yes, please specify.

There is no land reserved under the *National Parks Act 1975* within the Referral Area. However, the Ninety Mile Beach Marine National Park adjoins the north-eastern boundary of the Referral Area. Upon selection of the preferred corridor the Project would seek to minimise impacts to the Ninety Mile Beach Marine National Park as much so far as is reasonably practicable.

- **Within or adjoining other public land used for conservation or recreational purposes ?**
  ☐ NYD ☐ No ☒ Yes If yes, please specify.

There is land used for conservation or recreational purposes within the Referral Area, this includes:

- Fresh-water Swamp, Woodside Beach Wildlife Reserve
- Warrigal Creek Streamside Reserve
- Darriman H29 Bushland Reserve
- Woodside H28 Bushland Reserve
- Woodside H27 Bushland Reserve
- Darriman H33 Bushland Reserve
- McLoughlins Beach – Seaspray Coastal Reserve
- Giffard (Rifle Range) Flora Reserve.

In addition, two conservation and recreational reserves abuts the Referral Area: Jack Smith Lake Wildlife Reserve and Nooramunga Marine and Coastal Park.

The exact locations for the Project's onshore infrastructure are yet to be determined, the Project will seek to avoid land used for conservation or recreational purposes as far as is reasonably practicable to minimise impacts.

Is any clearing vegetation or alteration of landforms likely to affect landscape values?

☐ NYD ☒ No ☐ Yes If yes, please briefly describe.

The extent of vegetation clearance is yet to be determined. However, some native vegetation clearing may be required for construction and placement of Project infrastructure including the underground export cable, shore crossing and substation. However, the Project is not expected to affect landscape values in surrounding areas or result in the alteration of landforms. Additionally, trenchless crossing methods such as HDD will be deployed where practicable, further reducing potential visual impacts. A detailed landscape and visual assessment will be undertaken to determine the potential to affect landscape values and mitigation measures will be considered.

Is there a potential for effects on landscape values of regional or State importance?

☒ NYD ☐ No ☐ Yes Please briefly explain response.

The Project component likely to have the greatest impact on landscape values are the offshore wind turbines. The preliminary visual appraisal identified that the offshore wind farm will be visible from areas of landscape value of State significance including the Ninety Mile Beach. With regards to impacts onshore, the onshore transmission infrastructure would be mostly underground and are not expected to affect landscape values.

The turbines would be located approximately at least 65 km from the Wilsons Promontory National Park, and approximately 80 km from the Wilsons Promontory Lighthouse. At these distances, the turbines are unlikely to be visible, even from the lighthouse elevation. Due to the earth's curvature, partial visibility of the nearest turbines would require the highest level of marine visibility levels (>50 km, consistent with international marine visibility standards) in combination with excellent marine atmospheric conditions. With increasing distance, the remaining turbines would progressively become less visible and are expected to fall completely below the horizon.

The degree of impact is not yet determined as a detailed landscape and visual assessment has not been undertaken. This assessment will commence as the Project design progresses, and results will be used to ensure that the Project is appropriately sited in order to minimise impact on landscape values.

Is mitigation of potential landscape effects proposed?

☒ NYD ☐ No ☐ Yes If yes, please briefly describe.

The Project will be designed to mitigate visual amenity impacts as much as possible. Onshore export cables would be buried. The need for mitigation of potential landscape effects will be determined as the Project design progressed and based on the results of the detailed landscape and visual assessment. As part of its approach to minimising landscape and visual effects, Iberdrola Australia is proposing to locate the offshore wind farm at least 25 kms from the coast.

Other information/comments? (eg. accuracy of information)

In addition to the detailed landscape and visual assessment, further community engagement will be undertaken to understand the sensitivity of the community and their landscape values.

Note: A preliminary landscape assessment is a specific requirement for a referral of a wind energy facility. This should provide a description of:

- The landscape character of the site and surrounding areas including landform, vegetation types and coverage, water features, any other notable features and current land use;
- The location of nearby dwellings, townships, recreation areas, major roads, above-ground utilities, tourist routes and walking tracks;
- Views to the site and to the proposed location of wind turbines from key vantage points (including views showing existing nearby dwellings and views from major roads, walking tracks and tourist routes) sufficient to give a sense of the overall site in its setting.

Soils

Is there a potential for effects on land stability, acid sulphate soils or highly erodible soils?

☒ NYD ☐ No ☐ Yes If yes, please briefly describe.

A review of the Australian Soil Resource Information System (**ASRIS**) indicates that there is an extremely low probability of Acid Sulphate Soils (**ASS**) of occurring inland of the onshore portion of the Referral Area. However, along the coast, there is a mix of areas where ASS ranges from having a high probability to an extremely low probability to occur.

Areas of potential Coastal Acid Sulphate Soils (**CASS**) lies along the boundary of the ECC investigation area which include wetland areas along the entire coastline and inshore of the Referral Area.

No land within the Referral Area is subject to Erosion Management Overlays.

Further assessment will be undertaken as Project design progresses to identify the potential for highly erodible soils to occur and that could be affected by the Project. Where disturbance of ASS and CASS cannot be avoided, management procedures will be prepared and implemented for the Project.

Are there geotechnical hazards that may either affect the project or be affected by it?

☒ NYD ☐ No ☐ Yes If yes, please briefly describe.

Potential geotechnical hazards could be present. A detailed geomorphic assessment will be undertaken as the Project progresses and which inform cable corridor selection to avoid, minimise and to develop design solutions to manage any potential hazards to the Project.

Other information/comments? (eg. accuracy of information)

N/A

15. Social environments

Is the project likely to generate significant volumes of road traffic, during construction or operation?

☐ NYD ☒ No ☐ Yes If yes, provide estimate of traffic volume(s) if practicable.

During construction, the Project will generate traffic through the transport of personnel, equipment and infrastructure, and temporary traffic diversions and road closures may be required.

Transport routes to the onshore area would primarily be via South Gippsland Highway. Access routes to the southern part of the Referral Area include Cherry Tree Road, Woodside Beach Road, Balloong Road and Reeves Beach Road. Access to the northern part of the Referral Area is predominantly via Giffard Road, Giffard West Road and McGaurans Beach Road.
A traffic impact assessment has not yet been undertaken, however, the increase in traffic volumes associated with the Project is not expected to be significant. The need for any road upgrades will be identified and a detailed Traffic Management Plan will be prepared and implemented to minimise potential impacts caused by disruptions.

During the operational phase of the Project, traffic will be limited to vehicles conducting maintenance activities and is considered unlikely to be significant.

Is there a potential for significant effects on the amenity of residents, due to emissions of dust or odours or changes in visual, noise or traffic conditions?

☐ NYD ☒ No ☐ Yes If yes, briefly describe the nature of the changes in amenity conditions and the possible areas affected.

Dust emissions are likely to occur from construction activity, however, these are expected to be minimal and will be managed by implementation of the Project's construction and operational environmental management plans in accordance with EPA Publication 1834.1. The plans will also be implemented to minimise the risk of indirect impacts as a result of noise, runoff, dust generation and waste generation.

Temporary noise emissions are expected during construction and potentially decommissioning phases. A noise impact assessment will be undertaken as part of the Project's environmental investigation program and noise emissions will be managed throughout the Project lifecycle by implementation of the Project's environmental management plans.

Project related traffic will peak during construction and potentially decommissioning phases as discussed above. However, this is not expected to be long-term and will be managed through the Project's traffic management plans.

Potential effects on landscape and visual are discussed in Section 14. The degree of impact will be determined once a preliminary design is available. The Project will seek to locate onshore infrastructure from sensitive receptors such as residential communities. The magnitude and significance of this impact will be determined through a detailed landscape and visual impact assessment.

Is there a potential for exposure of a human community to health or safety hazards, due to emissions to air or water or noise or chemical hazards or associated transport?

☐ NYD ☒ No ☐ Yes If yes, briefly describe the hazards and possible implications.

As described above, there is potential for noise and dust emissions to be generated by the Project, however, these will be managed through implementation of environmental management plans and are not expected to impact community health due to emissions to air, water, noise or chemical hazards.

Is there a potential for displacement of residences or severance of residential access to community resources due to the proposed development?

☐ NYD ☒ No ☐ Yes If yes, briefly describe potential effects.

The Project is not expected to displace residences. There may be temporary access disruptions during construction and potentially decommissioning phases, however, this would be undertaken with the implementation of the Project's construction and operational environmental management plans and in consultation with affected residences. Contingency plans would include providing alternative access arrangements and deploying onsite traffic management.

Are non-residential land use activities likely to be displaced as a result of the project?

☒ NYD ☐ No ☐ Yes If yes, briefly describe the likely effects.

The Project is located in the vicinity of agriculture, fishing, forestry, recreation and conservation activities. There is not expected to be any displacement of these activities onshore during operation of the Project. However, there may be discrete and temporary impacts on some activities throughout the Project lifecycle.

Offshore, within Commonwealth waters, it is expected that safety exclusion zones would be established around the turbines and other offshore infrastructure (such as substations) during both construction and operations, although the exclusion zone is likely to be much smaller during operations. This may have an effect on marine uses in Victorian waters. The Project would seek to avoid areas of highest fishing intensity.

Moving towards the shore, there may be some restrictions to recreational activities during construction of the shore crossing and laying of the offshore cables. Further assessment and stakeholder engagement will be conducted to determine the potential for any significant impacts and to inform the development of a suitable solution to minimise impacts.

Do any expected changes in non-residential land use activities have a potential to cause adverse effects on local residents/communities, social groups or industries?

☒ NYD ☐ No ☐ Yes If yes, briefly describe the potential effects.

As described above, the Project is located in the vicinity of agriculture, fishing, forestry, recreation and conservation activities, and there may be discrete and temporary restrictions to some activities throughout the Project lifecycle. Further assessment and stakeholder engagement will

be conducted to determine the potential for any significant impacts and to inform the development of a suitable mitigation measures.

Is mitigation of potential social effects proposed?

☐ NYD ☐ No ☒ Yes If yes, please briefly describe.

Consultation and stakeholder engagement with potentially affected parties will be undertaken. Outcomes of this consultation will be used to inform Project development and its social impact assessment.

Other information/comments? (eg. accuracy of information)

N/A

Cultural heritage

Have relevant Indigenous organisations been consulted on the occurrence of Aboriginal cultural heritage within the project area?

☐ No If no, list any organisations that it is proposed to consult.
☒ Yes If yes, list the organisations so far consulted.

Iberdrola Australia has commenced consultation with the relevant Registered Aboriginal Party for the Referral Area – GLaWAC. Consultation will continue with GLaWAC throughout the development of the Project and the assessment of Aboriginal cultural heritage within the Referral Area.

What investigations of cultural heritage in the project area have been done?
(attach details of method and results of any surveys for the project & describe their accuracy)

A desktop Preliminary Heritage Assessment has been prepared (ERM, 2025c) (**Attachment 6**) to provide a baseline analysis of heritage sensitive values within and in proximity (within 1 km) to the Referral Area and to inform the Project's potential impacts on those values. The assessment involved a desktop review of literature and key Commonwealth, state and local database and register searches including but not limited to:

- Victorian Aboriginal Heritage Register (**VAHR**) (via the Aboriginal Cultural Heritage Register and Information System [**ACHRIS**]) for known Aboriginal heritage places.
- VicPlan for high-level mapping relating to sensitive areas and Aboriginal places.
- Publicly available heritage studies and archaeological assessment and reports and CHMPs.

Is any Aboriginal cultural heritage known from the project area?

☐ NYD ☐ No ☒ Yes If yes, briefly describe:

- Any sites listed on the AAV Site Register
- Sites or areas of sensitivity recorded in recent surveys from the project site or nearby
- Sites or areas of sensitivity identified by representatives of Indigenous organisations

The majority of the Referral Area intersects with areas of Aboriginal Cultural Heritage Sensitivity and contains a number of known Aboriginal heritage places listed on the VAHR. Most of the recorded Aboriginal places consist of stone artefact scatter, shell middens, and Low Density Artefact Contributions (**LDADs**). Aboriginal ancestral remains (Burial) have also been previously registered within the Referral Area.

Are there any cultural heritage places listed on the Heritage Register or the Archaeological Inventory under the *Heritage Act 1995* within the project area?

☐ NYD ☐ No ☒ Yes If yes, please list.

The Preliminary Heritage Assessment (ERM, 2025c) (**Attachment 6**) included searches of the VHR and VHI and identified:

- 1 VHR place, S875 (Unconfirmed Buried Wreck, Mclouglins Beach).

- 2 VHI (archaeological) items including H8321 – 0005 (Warrigal Creek Massacre Site) and H8220-0025 (Former Residence, Woodside Beach Road).

In addition, the preliminary assessment identified one recorded shipwreck within the offshore portion of the Referral Area including:

- Sarah – Shipwreck ID 6589, VHR ID S607.

Is mitigation of potential cultural heritage effects proposed?

☐ NYD ☐ No ☒ Yes If yes, please briefly describe.

Further assessment of onshore areas likely to be of cultural significance, and the preparation of suitable management and mitigation measures will be undertaken as part of the development of the Project's CHMP in consultation with GLaWAC.

Offshore heritage effects will be addressed through further investigations as the offshore ECC is refined. Where heritage values and/or sites are identified, infrastructure would be realigned to avoid impacts.

Other information/comments? (eg. accuracy of information)

A detailed assessment of potential Project impacts to cultural heritage values will be undertaken as the Project progresses, including an underwater cultural heritage assessment.

16. Energy, wastes & greenhouse gas emissions

What are the main sources of energy that the project facility would consume/generate?

☒ Electricity network. If possible, estimate power requirement/output …….
☐ Natural gas network. If possible, estimate gas requirement/output ……...
☒ Generated on-site. If possible, estimate power capacity/output …….
☐ Other. Please describe.

Please add any relevant additional information.

The Project would be developed to generate up to 3 GW of electricity which will be supplied to the NEM, with the potential to provide power to approximately 2.25 million households.

During construction, some energy (such as electricity and/or petrol) may need to be generated on-site to power machinery and equipment (including vessels). This energy required to construct the Project is relatively minimal in comparison to the renewable energy generated by the Project.

What are the main forms of waste that would be generated by the project facility?

☐ Wastewater. Describe briefly.
☐ Solid chemical wastes. Describe briefly.
☒ Excavated material. Describe briefly.
☐ Other. Describe briefly.

Please provide relevant further information, including proposed management of wastes.

Waste will primarily be generated during the construction phase due to excavation activities. Where possible the material excavated will be reused on site or transferred to a licensed landfill facility. Any excess material from the seabed installation including soil and drilling muds would be either removed or disposed of as required.

During operations, the Project is not expected to generate significant quantities of waste because the infrastructure will be generally inert.

What level of greenhouse gas emissions is expected to result directly from operation of the project facility?

☒ Less than 50,000 tonnes of CO_2 equivalent per annum
☐ Between 50,000 and 100,000 tonnes of CO_2 equivalent per annum

☐ Between 100,000 and 200,000 tonnes of CO_2 equivalent per annum
☐ More than 200,000 tonnes of CO_2 equivalent per annum

Please add any relevant additional information, including any identified mitigation options.

Greenhouse gas emissions by the Project would mostly be generated during manufacturing, construction, transport and shipping, and decommissioning phases.

During operations, the Project is expected to contribute to a reduction in greenhouse gas emissions through offsetting more carbon-intensive forms of power generation.

17. Other environmental issues

Are there any other environmental issues arising from the proposed project?

☒ No ☐ Yes If yes, briefly describe.

18. Environmental management

What measures are currently proposed to avoid, minimise or manage the main potential adverse environmental effects? (if not already described above)

☒ Siting: Please describe briefly

☒ Design: Please describe briefly

☒ Environmental management: Please describe briefly.

☐ Other: Please describe briefly

Add any relevant additional information.

The Referral Area incorporates broad investigation areas based on initial Project concept design allowing flexibility for potential siting options, some of which would be informed by the location of the VicGrid Connection Hub. The Project is subject to an iterative process of refining the siting and design of Project components to avoid and minimise the potential of adverse environmental effects.

Siting

Iberdrola Australia has been assessing the potential for offshore wind development in Australia since 2021. The Gippsland region was identified for development due to its world-class wind resources, consistent high wind speeds, proximity to existing electricity transmission infrastructure, and suitability for large-scale renewable energy development.

The Project is in the early stages of development, further investigations are required to inform the design and avoid adverse impacts on the environment. Following additional assessment and consultation, the Project will seek to locate Project infrastructure to avoid sensitive receptors and environmentally sensitive locations as much as possible. Although the Project is in early stages of design, some design decisions have been made to avoid, minimise and manage potential environmental effects. Within the onshore portion of the Referral Area, the Project has already identified proposed avoidance areas, as shown in **Figure 1-6** of **Attachment 1.** This includes the Jack Smith Lake Wildlife Reserve (listed as an Important Wetland) and the Corner Inlet Ramsar site. Other proposed avoidance areas include reserves, forestry areas and known heritage sites and cultural heritage areas. The proposed avoidance areas have been identified to reduce potential effects on areas of high biodiversity value and ensure that sensitive ecological features, as well as heritage sites and culturally sensitive areas, are protected from direct disturbance.

Design

Design development and construction methodology will adopt the principles of avoid and mitigate impacts wherever possible. Commitments on design aspects have already been made to reduce potential impacts include:

- A trenchless shore crossing through HDD (subject to further technical feasibility studies).
- Prioritising underground placement of infrastructure so far as is reasonably practicable.
- Investigation of trenchless crossings of sensitive waterways and habitats.

Environmental management

The Project is committed to applying best practice environmental management in detailed design, construction and operation. Environmental risks and potential amenity impacts will be addressed through a combination of siting, design and implementation of appropriate management measures. To guide this, an Environmental Management Framework (**EMF**) will be developed to outline the overarching approach for identifying, mitigating and managing potential environmental and amenity impacts. The EMF will set out requirements for preparing site and activity specific management measures to address impacts during each stage of the Project. It may also establish the processes for monitoring, reporting and auditing, to ensure that commitments are implemented effectively and that environmental performance is continually reviewed and improved. These requirements, management measures and processes in both construction and operations would be detailed in the Project's construction and operational environmental management plans.

19. Other activities

Are there any other activities in the vicinity of the proposed project that have a potential for cumulative effects?

☐ NYD ☐ No ☒ Yes If yes, briefly describe.

There are several other proposed or existing projects within the onshore and offshore portion of the Referral Area:

- The offshore ECC investigation area lies within DPA R359F (including within Victorian state waters), which is associated with defence activities from the East Sale RAAF Base used for air surveillance, Royal Australian Air Force training and may also support navy vessel and submarine activities on occasion.
- There is the potential for UXO to occur within the Referral Area (including within Victorian state waters). Two former Air Weapons Ranges are adjacent to the north-east portion of the offshore ECC investigation area. One site was used as an Air Weapons Range during WWII and overlaps the offshore ECC investigation area within Victorian state waters.
- The Basslink HVDC Interconnector and Telecoms Cable – overlaps with the onshore portion of the Referral Area.

In addition, there are several proposed or existing projects in proximity of the Referral Area (all of which are located within Commonwealth waters):

- The Blue Mackerel North Offshore Wind Project – located inshore (north-west) of the OWF area.
- Great Eastern Offshore Wind – located adjacent (south-west) of the OWF area.
- Star of the South – located west of the OWF area.
- Gippsland 01 and Gippsland 02 – located offshore (south-west) of the OWF area.
- High Sea Wind – located south of the OWF area.
- CarbonNet project – partially overlapping with the OWF area and ECC offshore investigation area.

In addition to offshore wind projects proposed within the Gippsland Declared Area, VicGrid is progressing the development of new transmission infrastructure in the Gippsland region to support offshore wind generation. This includes the proposed Gippsland Offshore Wind Transmission 2 GW Project, which would comprise a new overhead transmission line connecting a VicGrid Connection Hub near Giffard to the existing grid infrastructure in the Latrobe Valley. This infrastructure is located outside the Referral Area and is being delivered separately by VicGrid to facilitate connection for multiple offshore wind projects in the region, including the Aurora Green Offshore Wind Project.

Cumulative impacts have the potential to occur either in combination with one or all of these projects. An assessment of all relevant projects and potential cumulative effects will be undertaken for the Project.

20. Investigation program

Study program

Have any environmental studies not referred to above been conducted for the project?

☐ No ☒ Yes If yes, please list here and attach if relevant.

A 2-year marine baseline survey program has commenced and is currently being undertaken including:

- Metocean monitoring
- Marine mammals and other megafauna surveys
- Seabirds and shorebirds surveys.

In addition, the list above, marine baseline surveys that are proposed as part of the survey program but have not yet commenced include:

- Geophysical and geotechnical site investigations
- Marine water and sediment quality sampling
- Benthic, epibenthic and intertidal ecology surveys
- Fish ecology surveys

Some of these studies are currently underway (not yet complete), while others are yet to commence. As such, they are not included as attachments to this referral.

Has a program for future environmental studies been developed?

☒ No ☐ Yes If yes, briefly describe.

A program of future environmental studies is currently under development. The scope of these studies is being planned in consultation with regulatory agencies and stakeholders. These studies will also be informed by the outcomes of this referral and the EPBC Act referral to further understand potential impacts, and to identify appropriate mitigation, management and monitoring measures to inform Project design.

Consultation program

Has a consultation program conducted to date for the project?

☐ No ☒ Yes If yes, outline the consultation activities and the stakeholder groups or organisations consulted.

Early Engagement (2022 – 2024)

Iberdrola Australia has been engaging and consulting with a growing number of stakeholders since 2022 in preparation of the Feasibility Licence application. Prior to obtaining a Feasibility Licence, early engagement activities were focused on government, traditional owners, regulatory, supply chain and key technical and statutory stakeholders. This was followed by engagement with

local communities after the Feasibility Licence was awarded in July 2024. Iberdrola Australia has a Gippsland-based engagement and consultation team who have strong knowledge of the region, well-established local relationships, and are accessible to local stakeholders. The team is well equipped to understand the specific needs, concerns and perspectives of communities and can tailor engagement to suit local needs. Engagement with wider stakeholders continues as the Project develops and progresses through feasibility and technical environmental studies.

Continuous Engagement (2024 – ongoing)

Summaries of engagement undertaken with the following groups, as well as a full stakeholder list, is described further in the Project's Stakeholder Engagement Strategy (**Attachment 7**), which is published on the Aurora Green Offshore Wind Project website.

- State and Federal Government
- Local Government
- Traditional Owners
- Regulators
- Supply chain stakeholders
- Fishing Industry
- Oil and Gas Industry
- Offshore Wind Developer Groups
- Registered Training Organisations
- Other key industry stakeholders
- Gippsland community.

Engagement with Traditional Owners

Iberdrola Australia acknowledges the Gunaikurnai people as the Traditional Owners to the Country and Sea where the Project is proposed. In March 2025, Iberdrola Australia and GLaWAC entered into a landmark Engagement Agreement that guides the Project partnership to ensure GLaWAC is actively involved in discussions around the feasibility of the Project. Iberdrola Australia is proud to have been the first Gippsland offshore wind developer to achieve this outcome.

In announcing the agreement GLaWAC CEO, Daniel Miller, said: *"This agreement sets a strong precedent for how offshore wind proponents should engage with Traditional Owners, demonstrating the value of meaningful partnerships based on respect and shared outcomes." Engagement with GLaWAC will continue throughout all phases of the Project.*

Engagement with GLaWAC will continue throughout all phases of the Project.

Has a program for future consultation been developed?

☐ NYD ☐ No ☒ Yes If yes, briefly describe.

A range of inclusive and best practice communication tools and engagement methods will be utilised to inform, consult, involve or collaborate with different stakeholders, to share information, and support a cooperative approach to the development of the Project.

Consistent with the IAP2 Public Participation Spectrum, identified stakeholders have been assigned a preliminary grouping according to their current level of involvement and interest in the Project.

Ongoing engagement will consist of the following:

- Ongoing identification of interested persons, organisations, communities and groups.
- Engagement with newly interested persons, organisations, communities or groups identified, providing overview of the activities conducted.

- Notification of interested persons, organisation communities or groups in the event of change in activities.
- Feedback and comments received from relevant stakeholders continue to be assessed and responded to, as required, throughout the life of the Project.

All engagement is undertaken as per the Iberdrola Australia's Community and Stakeholder Engagement Policy (**Attachment 8**).

Authorised person for proponent:

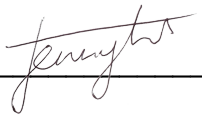
I, **Daniel Machado, Senior Manager Environment – Offshore Wind, Iberdrola Australia,** confirm that the information contained in this form is, to my knowledge, true and not misleading.

Signature 

Date 27 February 2026

Person who prepared this referral:

I, **Jenny Luk, Partner, ERM**, confirm that the information contained in this form is, to my knowledge, true and not misleading.

Signature 

Date 27 February 2026