Star of the South Offshore Wind Farm

Minister's Assessment under the Environment Effects Act 1978

October 2026

VICTORIA State Government | Department of Transport and Planning

Acknowledgement of Country

We proudly acknowledge the First Peoples of Victoria. We acknowledge their ongoing strength in practising the worlds' oldest living culture. We acknowledge the Traditional Owners' lands, waters and skies on which we live and work. We also pay our respect to their Elders past and present.



Description of artwork

Aaron Duggan (Gunaikurnai) 'Movements Between the Five Clans' 2019, acrylic on canvas

'The tracks are going between the five clans of the Gunaikurnai and the hands are the symbols of my spirit travelling around the campsites.'

This artwork was created through programs provided by the Torch. The Torch provides art, cultural and arts industry support to Indigenous offenders and ex-offenders in Victoria. The Torch aims to reduce the rate of re-offending by encouraging the exploration of identity and culture through art programs to define new pathways upon release.

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Abbreviations

BLCAC	Bunurong Land Council Aboriginal Corporation
CEMP	Construction Environment Management Plan
CHMP	Cultural Heritage Management Plan
DEECA	Department of Energy, Environment and Climate Action
DTP	Department of Transport and Planning
EES	Environment effects statement
EMF	Environmental Management Framework
EP Act	Environment Protection Act 2017 (Vic)
EPA	Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EP Regs	Environment Protection Regulations 2021
EVC	Ecological Vegetation Class
FFG Act	*Flora and Fauna Guarantee Act 1988* (Vic)
FP-SR	First People – State Relations
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
MACA	Marine and Coastal Act 2018 (Vic)
MNES	Matters of National Environmental Significance
OEMP	Operations Environmental Management Plan
PE Act	Planning and Environment Act 1987 (Vic)
PSA	Planning Scheme Amendment
RAP	Registered Aboriginal Party
TRG	Technical Reference Group
WGCMA	West Gippsland Catchment Management Authority

Executive Summary

The Star of the South project aims to deliver clean, secure and reliable source of large-scale renewable electricity to meet Victoria's legislated offshore wind targets and progress towards Australia's net-zero emissions by 2050 target, using offshore wind technologies.

It is my assessment that the potential environmental effects of the works proposed within Victorian jurisdiction for the Star of the South project are acceptable and can be effectively managed with the implementation of the proposed environmental management framework (EMF), amended consistent with the recommendations of this assessment. My assessment largely supports the recommendations of the Inquiry and includes refinements to some specific environmental management measures.

The Victorian works for the project comprise offshore export cables, a shore crossing at Reeves Beach, and an underground transmission system connecting the offshore wind farm to the proposed VicGrid connection hub at Giffard. The project would facilitate the delivery of renewable energy generated in Commonwealth waters to the Victorian electricity network and form a key component of the State's offshore wind energy development.

On 11 May 2020, the Minister for Planning decided under the *Environment Effects Act 1978*, an environment effects statement (EES) was required for the works proposed within Victorian jurisdiction to provide an integrated, robust and transparent assessment of the effects on the Victorian environment. The EES was exhibited for public comment from 18 May to 29 June 2026, receiving 51 written submissions. Following exhibition, the Inquiry that I appointed held a submitter conference over four days and considered submissions on relevant matters, to examine the project's environmental effects for works proposed within Victorian jurisdiction, as assessed in the EES. The Inquiry submitted its report to me on 8 October 2026.

The project is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to potential significant impacts on matters of national environmental significance (MNES). As the project is located within and outside the Victorian jurisdiction (in Commonwealth jurisdiction), the Commonwealth could not rely upon an accredited state EES process as the means for assessing EPBC Act matters. As such, the Commonwealth determined that the entire project would be assessed separately through an environmental impact statement (EIS).

The conclusions that I have reached and the recommendations I have made are informed by the proponent's EES, the report of the Inquiry appointed to consider the environmental effects of the works proposed within Victorian jurisdiction, public submissions received and relevant tabled documents. I have been greatly assisted in this assessment by the efforts of the Inquiry, the various parties who made submissions to the Inquiry and participated in its submitter conference, and the work of my department.

The Inquiry found that the project's environmental effects are not likely to be significant and was satisfied measures were taken as part of the project examined in the EES, to avoid, minimise and, where needed, mitigate potential environmental effects for relevant matters.

Having considered the findings of the EES and the Inquiry, I am satisfied that the Victorian works for the Star of the South project have been designed to avoid and minimise potentially significant environmental impacts and residual impacts can be managed through a comprehensive suite of measures, via the EMF.

I support the Inquiry's findings that the Victorian works for the project are not expected to have significant impacts with appropriate mitigation, and as such, can achieve acceptable environmental outcomes. Further, residual impacts for many aspects of the environment were assessed as negligible to minor.

1. Introduction

In light of the potential for significant environmental effects, on 11 May 2020, the Minister for Planning determined under the *Environment Effects Act 1978* that Star of the South Wind Farm Pty Ltd (the proponent) was to prepare an environment effects statement (EES) for the works proposed within Victorian jurisdiction for the Star of the South Offshore Wind Farm project (the project).

The procedures and requirements for the EES specified that the EES was to document investigation of potential environmental effects of the proposed project, including feasibility of associated environmental mitigation measures.

Following referral of the project under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in May 2020, it was determined on 2 June 2020 that the project (EPBC 2020/8650) is a controlled action requiring assessment and approval. This was because it was likely to have a significant impact on matters of national environmental significance, specifically Ramsar wetlands, listed threatened species and communities, listed migratory species and Commonwealth marine areas.

As the project is located within and outside the Victorian jurisdiction (in Commonwealth jurisdiction), the Commonwealth is not able to rely upon an accredited state EES process as the means for assessing EPBC Act matters. As such, the Commonwealth determined that the entire project would be assessed through an environmental impact statement (EIS). The proponent prepared and concurrently exhibited an EES and draft EIS, for 30 business days from 18 May to 29 June 2026. These documents shared technical reports that assessed potential impacts.

I appointed an inquiry under section 9(1) of the Environment Effects Act to inquire into, and report on, the environmental effects of the works proposed within Victorian jurisdiction on the Victorian environment as assessed in the EES, in accordance with terms of reference approved on 14 May 2026.

Planning Panels Victoria received 51 submissions on the exhibited EES and draft planning scheme amendment C129well (draft PSA). The Inquiry held a submitter conference over four days between 10 and 19 August 2026. The Inquiry received a total of 108 tabled documents. The Inquiry provided its report to me on 8 October 2026. The Inquiry's report, along with the EES, its supporting technical reports, public submissions, tabled documents and relevant legislation, policy and guidelines have informed my assessment of the environmental effects of the Victorian works of the project on the Victorian environment under the Environment Effects Act.

My assessment, like the inquiry report, relates only to the environmental effects of the Victorian works of the project on the Victorian environment, addressed in the EES.

I thank the inquiry for its considered report and advice, as well as the work of my department throughout the EES process. I also thank everyone who invested their time to make submissions and participate in the submitters conference and EES process. I have considered all of the matters relevant to the assessment of the potential environmental effects of the Victorian works of the project on the Victorian environment.

1.1. Purpose of this document

This document constitutes my assessment of the environmental effects of the Victorian works of the project on the Victorian environment under the Environment Effects Act. This assessment represents the final step in the EES process and provides comprehensive advice to decision-makers, the proponent and all other stakeholders on the likely environmental effects of the Victorian works of the project on the environment, their significance and acceptability, and recommendations on how the effects should be addressed in relevant statutory decisions and the delivery of Victorian works of the project. This assessment will inform the decisions required under Victorian law for the Victorian works of the project to proceed.

1.2. Structure of the assessment

The structure of my assessment is as follows:

- Chapter 2 provides a brief description of the project;
- Chapter 3 refers to key relevant Acts;
- Chapter 4 summarises the project's proposed environmental management framework;
- Chapter 5 assesses the environmental effects of the Victorian works of the project on the Victorian environment in relation to the evaluation objectives as set out in the project's EES scoping requirements;
- Chapter 6 presents my conclusions, including responses to the recommendations of the inquiry; and
- Appendix A contains my recommendations on the proposed mitigation measures.

2. Project description

The broader Star of the South Offshore Wind Farm project includes works within the Victorian jurisdiction (both onshore and offshore within 3 nautical miles from the coast of Victoria) (referred to as 'the project' in this assessment) and offshore works beyond 3 nautical miles which is within Commonwealth marine waters between 10 to 40 km off the coast of Gippsland.

For context, the broader project across both jurisdictions, comprises the development of:

- Up to 147 offshore wind turbines, five offshore substations and three interlink cables (wholly in Commonwealth marine waters);
- Offshore transmission infrastructure: up to eight offshore export cables to connect the wind farm to the shore crossing. These cables will traverse Commonwealth and Victorian waters;
- Shore crossing infrastructure: up to eight trenchless crossings containing the offshore export cables. Works for this infrastructure will be wholly within Victorian jurisdiction; and
- Onshore transmission infrastructure, consisting of an underground cable system extending approximately 30 km, from the shore crossing to the proposed VicGrid connection hub in Giffard. Works for this onshore transmission infrastructure will be wholly within Victorian jurisdiction.

The EES described the Victorian works as the construction, operation and decommissioning of transmission infrastructure to transfer power into the electricity grid.

The proposed onshore transmission infrastructure in Victoria has been refined and reduced significantly since the project was referred under the Environment Effects Act. Initially, the proposed onshore transmission infrastructure included underground cable and overhead powerlines to connect to the National Electricity Market in the Latrobe Valley and up to four substations. Since then, the proponent has adjusted its transmission alignment to terminate in Giffard at the proposed VicGrid connection hub.

The delineation of the two jurisdictions is shown in Figure 1. The Victorian works project area is broken down into three main sections:

- Victorian offshore export cable area: a 101 square kilometre marine area between the coast and the Victorian Coastal Water line (at 3 nautical miles or 5.5 km from the high-water mark). The area forms part of the broader 232 square kilometre offshore export cable area extending to the offshore wind farm area located in Commonwealth waters. The Victorian offshore export cable area would contain shore crossing duct entry points and offshore export cables.
- Shore crossing: located at Reeves Beach, where the offshore export cables transition to land and connect to the onshore underground cable system.
- Onshore project area: an approximately 30 km corridor extending from the shore crossing to the proposed VicGrid connection hub. It includes an underground cable system with a (common) alignment to Giffard West, at which point there are three alignment options (AB, C and D) to reach the proposed VicGrid connection hub.

The EES used a project design envelope approach to define a range of designs and parameters that could potentially be constructed for the Victorian works. This approach maintains flexibility for the detailed design and specifications still to be finalised following statutory decision-making. It included a flexible project definition with clear upper and lower limits for all project stages to inform environment assessment. This approach ensures impacts of all eventual options are considered, while maintaining maximum flexibility for ongoing project refinement and innovation. Each technical assessment identified a maximum design scenario relevant to that environmental matter that represents the greatest potential (worst-case) impact or risk. This ensured a conservative approach to impact assessment.

The proposed VicGrid connection hub will include provision for the project's approach cable easements, substations and associated infrastructure required to connect to the National Electricity Market. The proposed VicGrid connection hub is subject to a separate environmental assessment and approval process[1].

The project area comprises:

- A common alignment – extending from the shore crossing at Reeves Beach to Giffard.
- Three alignment options (AB, C and D) – feasible options to reach the proposed VicGrid connection hub.

These alignment options enable a comprehensive assessment of the project's potential impacts, pending the outcomes of the VicGrid connection hub assessment including the final location of the hub and connection infrastructure within it. Only one option will be needed to construct the project.

Subject to approvals, construction of the project could commence in 2030 and electricity generation from 2032.

Decommissioning of export cables located in Victorian waters is expected to be limited, with the offshore cables proposed to be retained in situ. At the shore crossing, underground infrastructure, including ducts and offshore export cables, is proposed to remain in situ at the end of the project's life. Onshore decommissioning is proposed to be carried out in accordance with regulatory and landholder requirements applicable at that time.

[1] Details on that project's assessment process is available at: planning.vic.gov.au/environmental-assessments/browse-projects/Gippsland-offshore-wind-2-GW-transmission-project

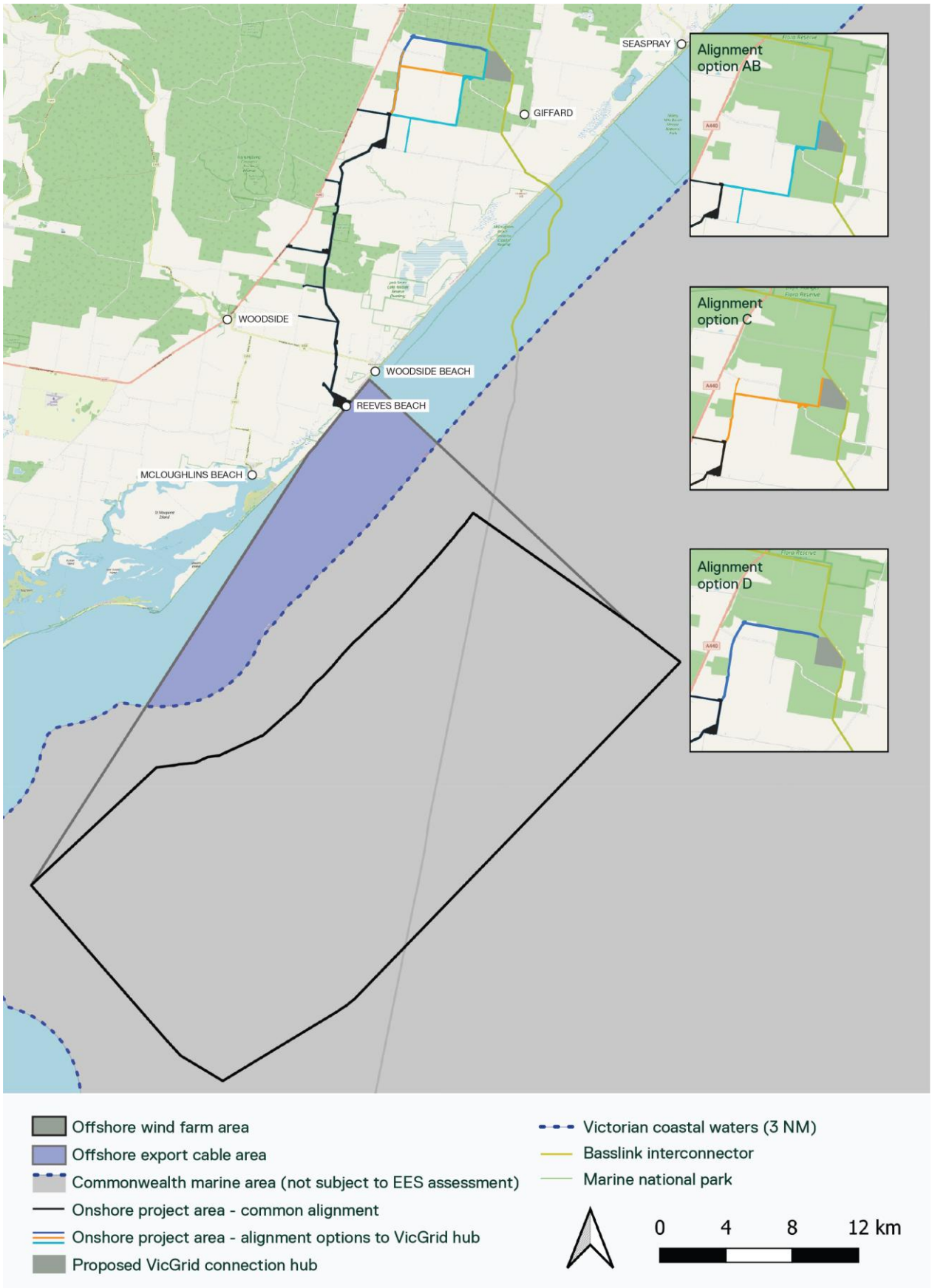


Figure 1 Star of the South Offshore Wind Farm - Victorian works project area (source: EES Chapter 4)

3. Statutory processes

This section refers to key acts that are relevant to my assessment of the project. The proponent requires a variety of statutory approvals under Victorian and Commonwealth law before they can proceed with the project. My assessment under the Environment Effects Act will inform approval and consent decisions for Victorian works under the *Planning and Environment Act 1987*, the *Aboriginal Heritage Act 2006* and the *Marine and Coastal Act 2018*, as well as a range of other permits and consents.

3.1. Environment Effects Act 1978

The Environment Effects Act provides for assessment of projects capable of having a significant effect on the environment. Following referral of a project to the Minister under Section 8, the Minister decides if assessment is required under the Environment Effects Act. When an EES is required, section 8C provides that a project and relevant approval decisions may not proceed until the Minister's assessment has been considered by the relevant decision-makers.

The steps in the EES process are set out within the *Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978* (eighth edition, 2023), made by the Minister under Section 10 of the Environment Effects Act (the Ministerial Guidelines).

On 11 May 2020, the Minister for Planning required the proponent to prepare an EES under the Environment Effects Act. Following exhibition of draft scoping requirements for public comment from 7 July to 27 July 2021, the former Minister for Planning issued final scoping requirements specifying the matters to be addressed in the EES. The department convened a technical reference group (TRG) for the project to provide advice to the proponent and the department on the preparation of the EES. The EES was completed and exhibited for public comment from 18 May to 29 June 2026. The EES attracted 51 submissions.

An inquiry was appointed under Section 9(1) of the Environment Effects Act to inquire into, and report on, the environmental effects of the Victorian works of the project on the environment and review submissions, in accordance with terms of reference approved on 14 May 2026.

The inquiry held a directions hearing on 14 July 2026, followed by a submitter conference, from 10 to 19 August 2026. The inquiry provided its report to me on 8 October 2026.

The Minister's assessment is the final step in the EES process under the Environment Effects Act. It summarises the environmental effects of the proposed Victorian works of the project to inform statutory decision-makers under Victorian legislation as outlined below. Decision-makers must consider this assessment before deciding whether and how the proposal should proceed.

3.2. Victorian statutory approvals

The primary Victorian statutory approvals required for this project to proceed are:

- Planning approval, in the form of a planning scheme amendment under the *Planning and Environment Act 1987* (PE Act).
- Approved cultural heritage management plan (CHMP) under the *Aboriginal Heritage Act 2006*.
- Consent under the Marine and Coastal Act 2018.

3.2.1. Planning and Environment Act

Approval under the PE Act will be required for the project via an amendment to the Wellington Planning Scheme. The proponent is seeking a specific controls overlay (SCO) with an incorporated document. The incorporated document would allow the use and development of land for the project to be undertaken in accordance with specific conditions.

The draft PSA was included with the exhibited EES as Attachment III and is discussed in Section 4.1. This provided opportunity for the community and other stakeholders to comment on the draft planning controls. The Inquiry considered the draft PSA within their report.

3.2.2. Aboriginal Heritage Act

The Aboriginal Heritage Act requires that an approved CHMP be prepared for works for which an EES is required. The project is situated on land for which Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) is the Registered Aboriginal Party (RAP) under the Aboriginal Heritage Act. A draft CHMP (no. 18092) is being prepared for the project, which will be evaluated by GLaWAC.

3.2.3. Marine and Coastal Act

Consent under the Marine and Coastal Act is required to 'use or develop, or undertake works on, marine and coastal Crown land' and applies to some project components located within Victorian coastal waters and Crown land within 200 metres of the high-water mark. The Department of Energy, Environment and Climate Action (DEECA) administers the Marine and Coastal Act.

3.3. Other Victorian statutory approvals

The project also requires a range of consents and permits including:

- lease agreements for the development of permanent infrastructure within Crown lands and seabed under the *Crown Land (Reserves) Act 1978*, *Forests Act 1958* and *Land Act 1958*;
- a licence for the generation and transmission of electricity for supply or sale under the *Electricity Industry Act 2000*;
- a permit to undertake activities within habitat for aquatic species protected under the *Fisheries Act 1995*;
- a permit for the removal of listed flora and fauna along the cable easement on Crown land under the *Flora and Fauna Guarantee Act 1988*;
- a licence or permit for the project's operation within a State forest under the *Forests Act 1958*;
- consent for temporary occupation of, or access to, roads under the *Road Management Act 2004*;
- a licence to construct within waterways to install the onshore transmission system and a take and use licence to construct a groundwater bore under the *Water Act 1989*; and
- authorisation to relocate or salvage wildlife under the *Wildlife Act 1975*.

4. Planning and environmental management framework

This section examines the proposed environmental management framework set out in the EES and the proposed planning control regime, both of which were further refined during the Inquiry. These have also informed my assessment of the project.

A robust environmental management regime is essential to ensure that potential adverse effects of the project are effectively avoided, mitigated and managed. In assessing the project's environmental effects, I have considered the adequacy of the proposed environmental management framework, including environmental governance arrangements and mechanisms for implementation, monitoring and reporting.

The EES proposed an environmental management regime to be given statutory effect through the Incorporated Document.

4.1. Planning scheme amendment

A draft planning scheme amendment (PSA) (Amendment C129well to the Wellington Planning Scheme) was prepared by the proponent and included in Attachment III of the exhibited EES. The draft PSA seeks to:

- facilitate the use and development of land for onshore works,
- establish a framework to manage potential environmental impacts,
- insert a Specific Controls Overlay (SCO) and associated incorporated document for the project into the Wellington planning scheme to allow the use and development of the project,
- amend the Wellington planning scheme maps to identify the land to which the SCO applies, and
- makes the Minister for Planning the responsible authority for the administration and enforcement of the incorporated document.

Amending the planning scheme to insert an SCO and an incorporated document would allow the proponent to address a range of planning provisions in the Wellington planning scheme, without the need for a series of individual planning permits, provided the conditions in the incorporated document are met.

The draft PSA includes controls which give effect to the environmental mitigation measures to be implemented, including the approval of the EMF under the incorporated document. The Inquiry was tasked with considering the EMF and draft PSA where relevant to the management of the environmental matters examined by the Inquiry, identified as 'Key Victorian Matters' and 'Other Victorian Matters' in their terms of reference[2].

Within this context, the Inquiry made recommendations to specific clauses and mitigation measures in the incorporated document and EMF, respectively. These recommendations are generally discussed in Section 5 as they relate to specific environmental matters examined in this assessment.

I note Council identified the PSA will require a new number to be allocated as C129well has been assigned to another Wellington Shire Council project.

As discussed in more detail below, in principle the proposed PSA and planning control regime are generally sound, although the final content of the PSA and incorporated document will need to be resolved in light of this assessment. My consideration of the PSA under the P&E Act is yet to occur and will not proceed until this assessment is considered.

[2] Terms of reference clauses 10 (f) and 11 (f).

4.1.1. Specific controls overlay

The proposed SCO will allow the land to be used and developed in accordance with specific clauses and requirements specified in the incorporated document.

The draft PSA seeks to apply the SCO ('project land') to the planning scheme maps in the Wellington Planning Scheme. The project land includes the:

- 'primary alignment' – land which has been assessed and selected as the project's transmission system alignment, and
- 'additional land' – viable alignment options and land to connect the primary alignment to the VicGrid connection hub study area (also referred to as the Giffard terminal station area).

The additional land accommodates the three alignment options (AB, C and D). The EES found the residual impacts were broadly comparable, with the exception of potential impacts on plantation forestry where option D impacts more than three times the plantation land to options AB and C. The Inquiry did not find any option to be unacceptable. The Inquiry considered it was 'appropriate to apply the SCO to the common alignment and alignment options at this stage of the process'. I agree with the Inquiry's finding that all three options examined in the EES are feasible and acceptable, and the final option can be determined at a later stage, noting this is likely to depend on the final location of the VicGrid connection hub. With respect to the viable alignment options, the 'additional land' mechanism in the SCO is appropriate to provide this flexibility.

Clause 6.8 of the incorporated document stipulates that where project infrastructure is proposed within the connection hub study area in 'additional land', the alignment plans required by clause 6.7 must include a report setting out the reasons for the proposed location of that infrastructure. The report must demonstrate the location of that infrastructure applies the three-step approach to avoid, minimise and offset impacts to native vegetation, consistent with the *Guidelines for the removal, destruction or lopping of native vegetation* (DEECA, 2025), which is appropriate.

The Inquiry recommended the VicGrid connection hub study area be removed from SCO as this land was not assessed as part of the EES. The Inquiry considered that applying the SCO to this land is premature and lacks justification. Further, the Inquiry recommended corresponding clauses of the incorporated document be amended or, in the case of clause 6.8, removed entirely. The Inquiry considered clause 6.8 was limited to native vegetation impacts and failed to consider 'other environmental effects that should be assessed before determining the appropriate location of the infrastructure and mitigations necessary to ensure impacts are acceptable for works in the VicGrid connection hub land, including for example Aboriginal cultural heritage'.

I do not support this recommendation as the Gippsland Offshore Wind Transmission Project, which includes the VicGrid connection hub study area, is currently preparing its EES. The separate assessment process is expected to be finalised before the proponent intends to submit alignment plans for this project to me for approval, and the effects of works within the connection hub area will therefore be known at the time of decision-making. Furthermore, impacts to native vegetation are expected to be minimal given the land has been used for plantation forestry, and an approved CHMP is required before works for either project can commence. Removing the connection hub land from the project area would remove the application of the control measures proposed in the EMF and will likely require a separate planning permit causing unnecessary delays and duplication without environmental benefit. It is my assessment that clause 6.8 appropriately responds to the current uncertainty of impacts within the VicGrid connection hub study area, enabling sufficient flexibility for the ultimate design to be delivered with acceptable impacts.

4.1.2. Incorporated document

The draft incorporated document includes conditions for alignment plans and the EMF to be endorsed by the Miniter for Planning prior to the commencement of development (excluding preparatory works). The draft incorporated document requirements include:

- approval of alignment plans showing details of project infrastructure, being the onshore transmission system including underground cables, telecommunications fibre and joints, and the shore crossing infrastructure including offshore export cables,
- approval of the EMF, and
- preparation of information for the final native vegetation removal extent, and evidence that offsets have been secured, to be prepared to the satisfaction of the Secretary to DEECA.

In deciding whether to endorse or amend the alignment plan or EMF, the Minister may seek the views of any other relevant authority by virtue of condition 6.3. Wellinton Shire Council's submission[3] sought further clarity and certainty to allow for collaboration and comment for any endorsement or amendment of the documents. The proponent referred to previous examples of similar clauses and submitted this is a matter for the Minister and no amendment to the condition was required. The Inquiry did not propose any changes in response to this submission. I accept the Inquiry's findings, noting that the final content of the PSA and incorporated document will be resolved in light of this assessment, before it is considered for approval in due course.

A key issue for the Inquiry was whether the impacts on existing land uses, including easement restrictions associated with the final alignment, had been appropriately avoided, minimised and managed. Wellington Shire Council raised concerns regarding restriction of activities from the easements, potential for the creation of small allotments in the Farming Zone, cost and administration of registering the easements and council's role in the alignment plan approval process.

The proponent submitted that the easement would have negligible impacts on land uses as the land is predominantly used for agriculture, only actions such as deep ripping and planting trees would be prohibited. The Inquiry noted the incorporated document did not include a requirement to remove the SCO covering additional land containing the optional alignments not chosen as the final alignment. The proponent suggested this process would be undertaken at a later date, but the Inquiry considered this uncertainty was insufficient for landowners regarding the use of their land. I agree with the Inquiry's recommendation to add the following new clause 4.4 requiring the removal of the SCO over land not required by the project following registration of required easements:

> *The control in this incorporated document ceases to apply to any Project Land that is not included in the endorsed Alignment Plan, 12 months after registration of all required easements on property titles where the Project is located, unless otherwise agreed in writing by the Minister for Planning.*

The Inquiry also recommended a minor change to clause 6.4 requiring a description of any consultation undertaken with landowners when applying for an amendment to the alignment plan or EMF. I agree with this recommendation, but noting that final content of the PSA and incorporated document will need be resolved in light of this assessment, before it is considered for approval in due course.

4.2. Victorian Environmental Management Framework

4.2.1. Governance framework

The EMF was presented in Chapter 26 of the EES. Consistent with its terms of reference, the Inquiry did not consider the EMF as a whole, but only as relevant to Key Victorian Matters and Other Matters.

[3] Submission 20

The EMF provides a governance framework for managing the environmental effects of the works in Victoria (see Figure 2). It provides a transparent framework with clear accountabilities for managing and monitoring the environmental effects and risks of the project. The EMF does not address matters relating to Commonwealth legislation. The EMF will capture mitigation measures and conditions required to manage effects under the PSA (for works on land) and the MAC Act consent (for works in the marine area).

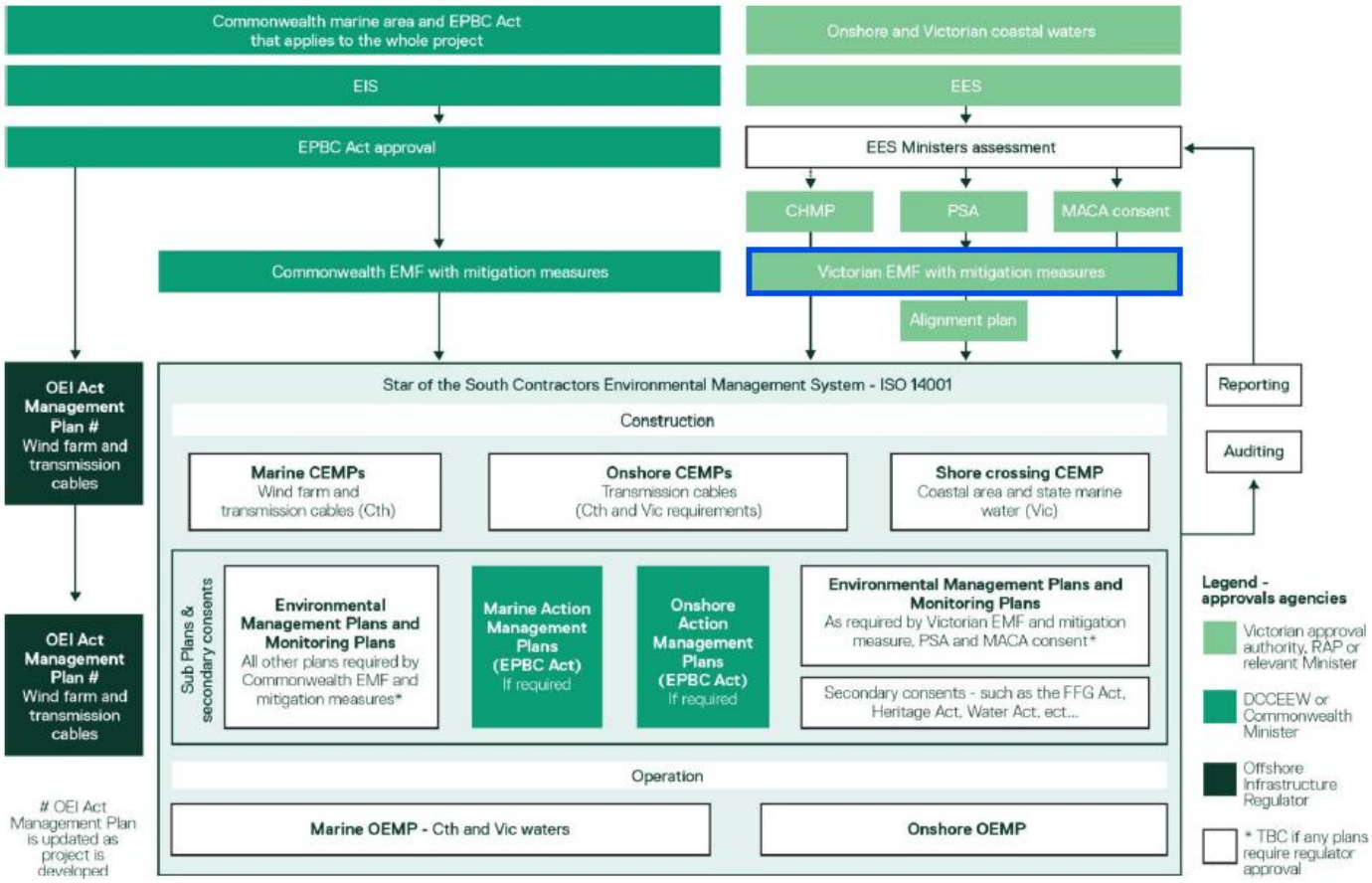


Figure 2: Overview of primary approvals, key plans and context for the Victorian EMF (highlighted in blue) (source: amended from EES Chapter 26)

The proponent is the entity responsible for delivering works in Victoria. A range of contractors will be engaged by the proponent to undertake discrete work packages. Contractors will be required to comply with the EMF as relevant to their work package and will also be required to ensure their sub-contractors comply.

4.2.2. Evaluating compliance

An important aspect of any robust EMF is the requirement for community consultation, stakeholder engagement and communications during the construction and operation of a project. To this end, the EMF is to set out procedures for:

- Complaints recording and resolution process;
- Auditing and reporting of performance including compliance with relevant statutory conditions and standards; and
- Reviewing the effectiveness of the EMF for continuous improvement.

The EMF outlined that compliance with approvals will be evaluated through monitoring, auditing and reporting. Contractors will be required to self-evaluate and undertake internal audits to ensure approval

requirements are met. The proponent will conduct monitoring and auditing of the contractors to confirm compliance. Audits completed by the proponent will evaluate compliance with:

- mitigation measures,
- statutory approvals,
- any other environmental management documentation,
- safety requirements, and
- monitoring programs.

Audits will also consider responses to non-conformances, complaints and incidents. A summary of audits will then be reported to government annually during construction and for the first two years of operations, unless otherwise agreed. In addition, the approach to the preparation of the CEMPs and OEMPs indicates the contractors will be responsible for the preparation of these documents, while the proponent will review and accept them.

In finalising the EMF, I recommend section 26.6.4 of the EMF require an Independent Environmental Auditor to review environmental management plans including the CEMP and OEMP, and ensure compliance with the mitigation measures and commitments of the EMF and incorporated document. Further, 6-monthly summary report's that summarises IEA audit activities and findings, status of actions taken to resolve any issues raised, and overall compliance with the project's Environmental Management Framework (EMF) should be made available to the public. It is common best practice for an Independent Environmental Auditor to be appointed to major infrastructure projects in Victoria and I recommend this is adopted for the project.

I accept the Inquiry's specific recommendations for an independent EPA-accredited auditor to be appointed to review and verify the implementation of certain mitigation measures. These recommendations are discussed in Section 5 of this assessment. However, in accepting these recommendations by the Inquiry, I further recommend the role and scope of the Independent Environmental Auditor include responsibility for the specific mitigation measures when an environmental auditor is proposed.

5. Assessment of environmental effects

This section details my examination of the potential effects of the Victorian works on each aspect of the environment in the context of relevant evaluation objectives, which are set out below. My assessment draws on the EES, public submissions, evidence and information presented to the EES inquiry, the EES inquiry report, and other relevant sources.

Legislation, policy, strategies and guidelines, and the objectives and principles of ecologically sustainable development, also contextualise my assessment. To provide an integrated structure for this assessment, key aspects of legislation and statutory policy are reflected in evaluation objectives that were set out in the EES scoping requirements. My assessment has been made in reference to these evaluation objectives (Table 1).

The scope of the inquiry's proceedings was limited to relevant matters associated with Victorian works including only 'Key Victorian Matters' and 'Other Victorian Matters' as set out in its Terms of Reference. The inquiry was to consider Key Victorian Matters via submitter conference and cover Other Victorian Matters via written submissions only. Accordingly, Key Victorian Matters with potentially significant effects are discussed in Section 5.1 of this assessment, while Other Victorian Matters are discussed in Section 5.2.

Clause 43 of the terms of reference required the Inquiry to simply record matters it determined have minor or negligible impacts that can be readily addressed through standard and proven environmental management techniques. The Inquiry determined the following matters were in this category:

- Common fauna (except koala).
- Downstream effects on Corner Inlet Ramsar Site.
- Marine electromagnetic field.
- Groundwater.
- Surface water.

The Inquiry had no recommendations on the relevant mitigation measures. I accept these findings and do not discuss these matters further in my assessment.

Other effects of the project not considered by the Inquiry included air quality, historic heritage, onshore electromagnetic fields and landscape and visual amenity. These are discussed in Section 5.3 of this assessment.

Table 1: Assessment evaluation objectives

Evaluation objective	Relevant section of this report
Biodiversity and habitat – To avoid, and where avoidance is not possible, minimise the potential adverse effects on protected native vegetation and listed threatened species and their habitat and listed ecological communities, in both onshore and offshore environments, as well as address offset requirements consistent with state policies.	Section 5.1.1 and Section 5.1.2
Water and catchment values – To minimise adverse effects on water (including groundwater, waterway, wetland, estuarine, intertidal and marine) quality and movement.	Section 5.1.2
Cultural heritage – To avoid or minimise adverse effects on Aboriginal and historic cultural heritage and associated values.	Section 5.1.3
Landscape and visual – To minimise and manage potential adverse effects on landscape and visual amenity.	Section 5.3

Evaluation objective	Relevant section of this report
Land use and socioeconomic – To avoid and minimise adverse effects on land use, social fabric of the community, local infrastructure, and local businesses and tourism during construction, operation and decommissioning of the project.	Section 4.1 and Section 5.2.2
Community amenity, safety, roads and transport – To avoid or minimise where avoidance is not possible, adverse effects on community amenity and health and safety, with regard to noise, vibration, dust the transport network, fire risk management and electromagnetic radiation.	Section 5.1.4 and Section 5.2

5.1. Key Victorian matters

5.1.1. Onshore ecology

Biodiversity and ecological effects were assessed in Chapter 8 and Technical report G of the EES, and Chapter 6 of the Inquiry's report. The EES proposed fourteen mitigation measures (FFM-M001 to FFM-M014) and one monitoring and contingency measure (FFM-M015) to address biodiversity and ecological effects. The Inquiry recommended changes to three mitigation measures (FFM-M001, FFM-M006 and FFM-M013).

Native vegetation removal is also governed by the proposed incorporated document (particularly clauses 6.12 to 6.14). In response to submissions and evidence, the proponent proposed changes to two clauses. The Inquiry adopted these changes.

Assessment context

The onshore ecology assessment focused on the onshore transmission corridor between Reeves Beach and the proposed VicGrid connection hub at Giffard, including conservation reserves, roadside vegetation, waterways and agricultural landscapes. The EES noted agricultural activity in the study area has resulted in a landscape predominantly clear of native vegetation. The remaining native vegetation is highly fragmented but has some high ecological values within the McLoughlins Beach–Seaspray Coastal Reserve and Woodside H28 Bushland Reserve (which included the highest density of potential hollow-bearing trees).

Ecological surveys were undertaken for most of the study area in accordance with relevant standards. Approximately 12% of the project area was unable to be accessed for surveys[4]. In these areas, a conservative approach was undertaken to ensure worst-case impacts were considered. This included using modelled EVC data with the highest modelled condition rating assumed to determine the potential offset requirement and using aerial imagery to determine scattered trees, all of which were assumed to be large and hollow-bearing. Targeted surveys were undertaken for threatened species across the study area. Where access was restricted additional on-ground ecological surveys are proposed to inform design and construction planning (FFM-M001).

The proposed PSA removes the need for planning permits for native vegetation removal as outlined in Section 4 of this assessment - it is proposed this is addressed through the clauses of the incorporated document which require further information and offsets to be provided to the satisfaction of DEECA in accordance with the Native vegetation guidelines, prior to removal of native vegetation (Clause 6.12 (a) and (b)). There is also an allowance for preparatory works excluding native vegetation removal for which a planning permit would

[4] as shown in Figure 6-3 in Technical Report G

ordinarily be required (Clause 6.14). DEECA[5] recommended changes to the wording of the incorporated document which were adopted by the proponent[6].

The proponent also revised FFM-M015 from being a monitoring and contingency measure to a mitigation measure and added reference to engagement with DEECA prior to submission of a FFG permit application. DEECA accepted[7] the proponent's revisions.

The key issues identified by the Inquiry and discussed in my assessment are whether the:

- impacts on terrestrial biodiversity values have been appropriately assessed,
- avoidance and minimisation steps are adequate,
- proposed mitigation measures are appropriate,
- unavoidable impacts will be appropriately offset or compensated, and
- residual impacts are acceptable.

Discussion

Native vegetation

Concerns raised in submissions were regarding uncertainty about the final design and extent of areas not surveyed. DEECA[8] however, was satisfied the project had adequately mapped and assessed native vegetation in accordance with the Native vegetation guidelines, 'allowing adequate assessment of the potential impacts for the purposes of informing the EES'. Mr Lane acknowledged some areas were unable to be surveyed, but explained that conservative assumptions were made such that the approach almost certainly over-estimates the impacts.

The Inquiry accepted the approach taken in the EES to assess unsurveyed areas and found the native vegetation potentially impacted had been sufficiently examined. I agree with the Inquiry and consider that potential impacts to native vegetation were appropriately assessed for the EES.

The EES described efforts taken to apply the three-step approach (avoid, minimise and offset) required by the *Guidelines for the removal, destruction or lopping of native vegetation* (DEECA, 2005) (Guidelines). The approach included key locations where the project has avoided and minimised impacts to native vegetation and sensitive ecological values such as through trenchless construction to avoid native vegetation in the McLoughlins Beach-Seaspray Coastal Reserve at the shore crossing, and reducing the working width of the project area where it crosses key sensitive areas to minimise impacts on native vegetation and habitat. Following this, the EES conservatively assumed the majority of vegetation and habitat in the project area will be permanently lost due to unavoidable impacts of construction. The EES concluded up to approximately 19 hectares of native vegetation and 119 large trees may be impacted, depending on which alignment option is selected[9] (see Table 2).

Table 2: Impacts to native vegetation

Alignment Option	Patch extent (ha)	Large Trees	Small Scattered Trees	Total Extent (ha)
AB	15.004	82	12	17.041
C	16.137	119	31	19.317

[5] Submission 40

[6] Tabled document 105

[7] Tabled document 93

[8] Submission 40

[9] as shown in Fig 10-1 in Technical Report G of the EES

Alignment Option	Patch extent (ha)	Large Trees	Small Scattered Trees	Total Extent (ha)
D	15.525	107	12	17.897

Source: EES Technical Report G

The EES notes most of the vegetation to be impacted is fragmented and of medium to low quality. However, depending on the final alignment option, approximately 1 hectare of highly sensitive native vegetation would be impacted (Table 3). The EES defined highly sensitive native vegetation as ecological vegetation classes (EVCs) listed as endangered, high quality or of high strategic biodiversity value. The EES considered impacts to highly sensitive native vegetation as localised and long-term with a rating of major, whereas impacts to the remaining less sensitive native vegetation were rated moderate.

Table 3: Impacts to native vegetation patches

Ecological Vegetation Class	Bioregional conservation status	Alignment AB	Alignment C	Alignment D
Coastal Dune Scrub	Depleted	0.106	0.106	0.106
Coast Banksia Woodland	Vulnerable	0.002	0.002	0.002
Damp Sands Herb-rich Woodland	Vulnerable	0.103	0.103	0.103
Estuarine Wetland	Least Concern	0.885	0.885	0.885
Heathy Woodland	Least Concern	0	0.223	0
Lowland Forest	Vulnerable	0.661	0.885	0.705
Lowland Forest / Heathy Woodland Mosaic	Vulnerable	4.339	0.547	0
Mapped Wetland	Endangered	0	0	0
Plains Grassy Forest	Vulnerable	7.036	11.517	11.517
Riparian Scrub	Vulnerable	0.920	0.920	1.258
Swamp Scrub	Endangered	0.957	0.954	0.954
	Total	**15.009**	**16.142**	**15.531**

Source: EES Chapter 8

DEECA was satisfied the proponent had adequately implemented avoid and minimise measures to date through the EES, generally in accordance with the Guidelines. The Inquiry was also satisfied the avoid and minimise measures were adequate and concluded that residual impacts to native vegetation were acceptable given the distribution of the loss, its small extent relative to the modelled native vegetation in the region, and that it will be offset. I agree with the Inquiry's conclusion and note there will be further opportunity to avoid and minimise impacts, as required by FFM-M001.

Offsets are required to be obtained prior to construction in line with the Guidelines.. The offset required is up to 8.197 general habitat units and 119 large trees depending on the final alignment. The EES states these offsets are readily available on the credit register[10], including wholly within the Wellington Shire Council

[10] as summarised in Table 16-2 in Technical Report G Technical Report G: Onshore Ecology, Appendix 8

municipal area. Wellington Shire Council's submission[11] noted Technical Report G stated; 'Priority will be given to offsets located closest to the project area'. Council supported this but raised that there was no commitment to do so in the EMF or PSA. The proponent responded stating[12] the project might consider priority being given to offsets located closest to the project where feasible, but noted it was not strictly required under the Guidelines.

The Inquiry recommended FFM-M001 include a non-binding preference for offsets to be sourced locally. I note it is not a requirement of the Native vegetation guidelines, but good practice, to secure offsets as close as possible to the impacts. As such, while I support the intent of the Inquiry's recommendation, and encourage the proponent to locate offsets as close to the project area as practicable, I do not accept this amendment to FFM-M001.

Habitat values and hollow-bearing trees

The EES assessed residual impacts on large and hollow-bearing tree habitat as major due to the time required for replacement habitat to develop. DEECA sought changes to the exhibited EMF to 'prioritise the retention of hollow bearing trees, high-quality native vegetation breeding habitat and prevention of habitat fragmentation at the detailed design stage to further avoid impacts to native vegetation and threatened fauna habitat'. DEECA accepted the changes the proponent made to the mitigation measures to address these concerns.

The Inquiry was satisfied the loss of hollow bearing trees had been adequately assessed. The Inquiry reasoned that due to the significant time required for hollow rehabilitation, the importance of the artificial hollow program (proposed in FFM-M006) increased. The Inquiry recommended FFM-M006 be expanded to include more detail on the scope of the proposed artificial hollow program. I accept the Inquiry's recommendation.

Threatened flora

The EES assessed potential impacts to FFG-Act listed species and communities through a desktop assessment followed by targeted surveys where access was available. The EES recorded potential impacts to the following threatened flora species found to be present:

- Pale Swamp Everlasting (critically endangered) up to 10 individuals, considered minor impact.
- Coast Grey-box (endangered) 23 individuals to be impacted, considered minor impact.
- Dune Wood-sorrel (endangered) 20 individuals and 0.106 ha of potential habitat to be impacted, considered minor impact.

The EES considered impacts to the following species found to be potentially present, depending on the corridor option selected for the VicGrid connection hub:

- Thick-lip Spider Orchid (vulnerable) up to 4.201 ha of potential habitat for Options C and D, moderate impact.
- Dense Leek-orchid (critically endangered) up to 0.101 ha of potential habitat for Option C only, moderate impact.
- Cobra Greenhood (endangered) up to 5.435 ha of potential habitat for Option C, minor impact.
- Spiral-leaved sun-orchid (endangered) up to 4.201 ha of potential habitat for Options C and D, moderate impact.

DEECA was satisfied threatened flora species had been adequately assessed for the purpose of the EES as presence had been assumed where necessary. However, DEECA submitted that further information is likely to be required to assess whether a permit can be issued to take Protected Flora under the FFG Act, noting that

[11] Submission 20

[12] Tabled document 41

'the impact to individuals and local populations has not been adequately described' for this purpose. DEECA supported the proposed measures (FFM-M001, FFM-M005 and FFM-M015) to address this uncertainty given they create a framework that requires the proponent to undertake further targeted surveys prior to construction to inform permit applications. DEECA submitted FFM-M015 should be included as a mitigation measure and be expanded to include consultation with DEECA, which was adopted by the proponent.

The Inquiry was satisfied the survey effort was suitable and supported the revised FFM-M015 as providing an appropriate mechanism for confirming species presence on public land prior to construction. I agree with the Inquiry that the EES adopted a suitably conservative approach to the assessment of potential impacts on threatened flora.

The Inquiry found the residual impacts on threatened flora to be acceptable. However, the Inquiry considered that the management of unavoidable direct loss for Pale Swamp Everlasting and Coast Grey-box would be more consistent with best practice and achieve better outcomes if compensatory measures were secured. Notwithstanding this, the Inquiry accepted the need for flexibility and proposed FFM-M013 be amended to require specific measures to compensate both species, while allowing details to be determined at a later date in consultation with DEECA. I agree with the Inquiry's findings that impacts on threatened flora are acceptable. I also accept the Inquiry's amendment to FFM-M013, and it is my assessment that with its implementation, the impacts to Pale Swamp Everlasting and Coast Grey-box are acceptable.

Threatened ecological communities

The EES stated no threatened communities listed under the FFG Act were recorded within the study area. DEECA's submission[13] asserted there was insufficient evidence to rule out the presence of the Plains Grassland (South Gippsland) community along Lyons Road. Noting there is less than 15 ha of this community left in Victoria, DEECA submitted any impact would be significant and that avoidance of this community should be prioritised. DEECA submitted a description of the potential presence of this community was required to properly assess a future FFG permit application. Further, where avoidance is not possible, compensation may be required as a condition of a future permit.

The Inquiry was satisfied the uncertainty relating to the presence of Plains Grassland (South Gippsland) community along Lyons Road can be adequately managed through the revised mitigation measure FFM-M015. I agree with the Inquiry's finding that impacts to this community will be adequately addressed through pre-construction targeted surveys required by FFM-M015 and would then inform DEECA's consideration of a future FFG permit application.

Threatened Fauna

The EES assessed potential impacts to FFG Act listed threatened fauna related to direct habitat removal and indirect habitat disturbance, fragmentation or fauna injury. The assessment identified nine listed threatened birds, two listed mammals, one listed reptile and two listed frog species under the FFG Act as possibly occurring. The EES considered residual impacts to be localised and short to medium-term, with all impacts rated as negligible, except to New Holland Mouse, Martin's Toadlet and Southern Toadlet which were assessed as moderate (Table 4). The EES concluded residual impacts were not significant.

[13] Submission 40

Table 4: Summary of impacts to FFG Act threatened fauna with residual impact of minor or greater

Common Name	Scientific Name	FFG Status	Loss of potential habitat (ha)			Residual Impact
			Alignment AB	Alignment C	Alignment D	
Black Falcon	*Falco subniger*	Critically Endangered	Small	Small	Small	Minor
Chestnut-rumped Heath-wren	*Calamanthus pyrrhopygius*	Vulnerable	4	3	3	Minor
Gang-gang Cockatoo	*Callocephalon fimbriatum*	Endangered	7 ha and 32 large trees	9 ha and 53 large trees	9 ha and 53 large trees	Minor
Swift Parrot	*Lathamus discolor*	Critically Endangered	6.5	8.5	9	Minor
Orange-bellied Parrot	*Neophema chrysogaster*	Critically Endangered	25 ha degraded pasture			Minor
White-bellied Sea-eagle	*Haliaeetus leucogaster*	Endangered	Temporary construction impacts			Minor
Grey-headed Flying-Fox	*Pteropus poliocephalus*	Vulnerable	8	10	10.5	Minor
New Holland Mouse	*Pseudomys novaehollandiae*	Vulnerable	4	2.5	2	Moderate
White-footed Dunnart	*Sminthopsis leucopus*	Vulnerable	8	10.5	11	Minor
Glossy Grass Skink	*Pseudemoia rawlinsoni*	Endangered	2.5	2	2	Minor
Martin's Toadlet	*Uperoleia martini*	Endangered	6	10	10.5	Moderate
Southern Toadlet	*Pseudophryne semimarmorata*	Endangered	4	2.5	2	Moderate
Koala (Strzelecki population)	*Phascolarctos cinereus*	Not listed	8	10	10	Minor

source: EES Chapter 8

DEECA's submission[14] stated that the EES had identified threatened fauna species likely to be present and potential impacts had been adequately assessed, avoided and minimised as far as possible, at this stage. DEECA considered mitigation measures were appropriate subject to some recommended changes to FFM-001, FFM-M005 and FFM-M006. These changes sought species-specific management protocols for particular species. The proponent proposed changes to these mitigation measures to which DEECA was satisfied.

[14] Submission 40

Submissions raised concerns regarding the Orange-bellied Parrot, Southern Bent-wing Bat and potential indirect effects on threatened birds and wildlife generally from the shore crossing. In response to submissions and Mr Lane's evidence, the proponent proposed changes to FFM-M006 to prioritise lower-impact lighting for both mammals and migratory birds if possible.

The Inquiry was satisfied the fauna assessment was adequate and appropriate surveys were undertaken. The Inquiry noted residual uncertainty could be resolved by either assuming presence or undertaking further surveys and the EMF provided an appropriate framework to address this. The Inquiry accepted evidence that Southern Bent-wing Bat is unlikely to be present and no further assessment is required. The Inquiry also considered the EES had appropriately assessed potential impacts to Orange-bellied Parrot and that given the poor quality feeding habitat proposed to be removed, was not of concern.

I agree with the Inquiry's finding that the assessment of threatened fauna was adequate and the proposed mitigation measures are appropriate. I accept the conclusions of the Inquiry that residual impacts to threatened fauna are unlikely to be significant, subject to the adoption of the recommendations of the Inquiry, as amended through this assessment.

I also note the EES suggested locally indigenous plants known to be favoured food for the New Holland Mouse and the Orange-bellied Parrot should be prioritised for planting in respective habitat areas impacted by the project. This is not clearly stated in FFM-M013, therefore I recommend this measure noted in the EES is included as a requirement in FFM-M013, i.e. as far as practicable and subject to landowner consents.

Koala (Strzelecki population)

Koala (Phascolarctos cinereus) is not listed under the FFG Act, however the Strzelecki Ranges population is one of few remaining original populations in Victoria and is therefore genetically important. As the Strzelecki Koala is well documented and known to be present in the area, a targeted survey was not required to establish its presence. However, Koalas were recorded during field surveys for other species and there are many VBA records around the project area. The EES predicts an impact of 8-10 ha of potential habitat, excluding eucalyptus plantation, with the residual impact being negligible as the loss of habitat is limited in extent to the site level and individuals will move into new areas.

The Friends of the Koalas Inc submission[15] raised concern that an accurate indication of koala numbers and distribution was not presented in the EES and that the Victorian Koala Management Strategy had not been referenced. The proponent's response to submissions[16] referred to Mr Lane's expert witness statement[17] which concluded such information would ultimately be 'of limited relevance to the assessment'. Wellington Shire Council recommended[18] FFM-M006 include the specific mitigation measures mentioned in the technical report to; 'Design construction fencing, trenching and other construction elements to allow Koalas to exit the construction area'. The proponent adopted this change.

The Inquiry was satisfied the koala had been appropriately assessed. Consistent with Mr Lane's evidence, the Inquiry recommended FFM-M006 be amended to include identification of zones to reduce speed limits in areas of extensive Koala habitat. I agree with the Inquiry's findings and adopt the recommendation. Subject to this being adopted, it is my assessment that impacts to Koalas are acceptable.

Onshore biosecurity

The EES assessed a medium residual risk during construction to biosecurity, finding the risk to be localised and mitigated through site hygiene, weed and pest control, and environmental inductions. The EES assessed

[15] Submission 34

[16] Tabled document 48

[17] Tabled document 41

[18] Submission 20

biosecurity risks as low during other phases of the project. The EES found that biosecurity risks can be effectively managed through implementation of a Biosecurity Management Plan (AGM-M005) and associated environmental management measures (FFM-M007). Overall, the EES concluded that biosecurity impacts would not result in significant adverse effects.

The Inquiry supported the proponent's amendments made in response to Wellington Council and DEECA submissions. These included: addition of a dispersal risk assessment and pest mapping (FFM-M007), linking rehabilitation monitoring frequency to high risk weed life cycles (FFM-M013), adding monitoring, auditing and enforcement requirements (AGM-M005) and adding Wellington Council, agricultural specialists, affected landowners and Agriculture Victoria as consultation parties (AGM-M005, FFM-M013).

The Inquiry acknowledged the emergence of bird flu as a new threat to the Victorian environment after the EES was prepared, stating that while the risks identified by submitters are not necessarily attributable to the Victorian works, the Inquiry agreed there is a valid need to manage the potential for biosecurity risks to change over the construction period.

The Inquiry found that biosecurity threats and risks were adequately assessed, and the proposed approach appropriately minimises and manages impacts, including in relation to bird flu. The Inquiry accepted the project is unlikely to increase pest animal population above existing levels, and supported the changes requested by Wellington Council and accepted by the proponent, as reasonable and appropriate. The Inquiry considered the residual risks acceptable. I accept the Inquiry's findings.

Cumulative Impacts

The Inquiry noted there is some uncertainty in the assessment of cumulative impacts because the ecological effects of other major projects are not yet defined. I consider this is a common limitation for cumulative assessments and, support the Inquiry's finding that this reinforces the importance of applying the mitigation hierarchy to the project, including avoiding threatened flora and habitat as far as practicable. The Inquiry found that subject to measures such as further avoidance and minimisation during detailed design, the contribution of the project to cumulative impacts can be appropriately minimised and managed. I agree with the Inquiry's finding.

Assessment

It is my assessment that:

- The project design to date has appropriately avoided and minimised potentially significant impacts to biodiversity values.
- Subject to adopting the recommendations set out in this assessment, the proposed mitigation measures are appropriate, including the need for further survey to inform any permit application under the FFG Act.
- Opportunities should be fully explored during detailed design to further avoid and minimise impacts to threatened flora, areas of high biodiversity values, including Woodside H28 Bushland Reserve, and highly sensitive native vegetation.
- Mitigation measure FFM-M013 should be amended to include a requirement for locally indigenous plants known to be favoured food for the New Holland Mouse and Orange-bellied Parrot to be prioritised for planting in impacted habitat areas, as far as practicable and subject to landowner consents.
- Unavoidable impacts will be appropriately offset or compensated.
- The residual impacts of the project on native vegetation and biodiversity values assessed though the EES are acceptable, with the adoption of the recommendations of the Inquiry, as amended through this assessment.

5.1.2. Victorian marine environment

Effects on the Victorian marine environment were assessed in chapters 23 and 24, and technical reports A to F of the EES and chapters 7 and 8 of the Inquiry's report. The proponent proposed 32 mitigation measures and four monitoring and contingency measures to address effects on the Victorian marine environment. The Inquiry recommended changes to one mitigation measure (SPL-M02).

Assessment context

This assessment considers the Victorian offshore export cable area, the shore crossing at Reeves Beach, vessel movements associated with construction and operation, and potential interactions with nearby marine protected areas. The offshore export cable area covers approximately 86 square kilometres of Victorian marine waters from the shoreline to depths of just over 20 metres. The EES identified no marine environment or marine protected area impacts with a residual consequence of moderate or higher, with residual impacts generally assessed as negligible to minor and residual risks as low to very low.

The key issues identified by the Inquiry and discussed in my assessment are whether the:

- impacts and risks on the Victorian marine environment from works in Victoria have been adequately assessed,
- avoidance, minimisation and mitigation measures are appropriate, and
- residual environmental impacts and risks are acceptable.

Discussion

Coastal Processes

The EES assessed potential impacts from horizontal directional drilling exit pits, cable trenching and shore crossing construction on coastal processes, sediment transport and important coastal landforms. Modelling in the EES predicted impacts from excavation works would be localised, temporary and rapidly infilled by natural coastal processes, with no measurable changes to regional wave climate, shoreline behaviour, sediment transport systems or the geomorphological values of Corner Inlet and Ninety Mile Beach. The EES concluded that construction and operational activities would not result in measurable changes to coastal processes outside the range of natural variability and that impacts on significant coastal landforms, tidal deltas and barrier systems would be negligible.

The EES proposed a coastal monitoring measure (MEMP-M05) requiring precautionary monitoring of any coastal change based on satellite imagery for the first 10 years to detect any changes. Following discussions during the submitter conference, the proponent submitted coastal monitoring was not warranted for the Victorian works, stating it was more appropriate in the Commonwealth EMF, and removed it as a proposed requirement of the Victorian EMF.

The Inquiry accepted the EES provided a comprehensive assessment of the potential effects, with conclusions that are robust and supported by evidence. The Inquiry agreed with the proponent that the Victorian works will have nil to negligible impacts on coastal processes including hydrodynamics and sediment transport. However, the Inquiry considered a precautionary approach should be adopted given the sensitivity of the coastal environs, and considered a requirement for coastal monitoring should be included as recommended in Technical Report A of the EES. As such, while the Inquiry agreed that MEMP-M05 was more appropriate in the Commonwealth EMF, given that recommendation is beyond its scope, it instead recommended the measure be reinstated in the Victorian EMF and increased from 10 years to the expected life of the project.

I accept the Inquiry's conclusions the project will likely have negligible residual impacts on coastal processes, and that these can be appropriately managed. I also support the proponent's proposed removal of MEMP-M05 for the Victorian EMF, given the evidence that the Victorian works are very unlikely to have any material impacts on coastal processes. I also accept that MEMP-M05 is more relevant to the Commonwealth EMF,

although this is a matter for the Commonwealth. I therefore do not support the Inquiry's recommendation to reinstate this measure in the Victorian EMF.

It is my assessment that impacts on coastal processes will not be significant and are acceptable.

Benthic ecology

The EES identified three habitat types that were prevalent in the offshore export cable area within Victorian waters; soft sediment (92%), rocky reef (7%) and seagrass (1%). The EES rated soft sediment as having lower sensitivity, while rocky reef, and soft sediment with seagrass, were rated as having medium sensitivity. The seagrass was identified as the FFG Act listed species; Tasman Grass-wrack (*Heterozostera tasmanica*). The EES concluded there were no impact pathways that could lead to potentially significant impacts on these benthic ecology receptors. Therefore residual impacts were rated negligible to minor.

Several submitters raised concerns about: whether seabed disturbance impacts would necessarily remain localised and short term; the adequacy of the EES assessments; and whether sea grass and high-profile reef would be avoided. DEECA submitted[19] to the Inquiry that potential impacts to the benthic environment had not been adequately assessed, seeking additional mitigation measures to address the residual uncertainty around these matters. Specifically, DEECA recommended the EMF include requirements that prior to any seabed disturbance, sensitive marine benthic communities are clearly identified and mapped, and avoided where possible. Further DEECA highlighted that a permit under the FFG Act would be required if seagrass needs to be removed for the final proposed export cable route.

The proponent accepted DEECA's amendments, proposing a new mitigation measure (BHC-M02) which requires seagrass distribution to be mapped in Victorian waters once the proposed export cable route is selected, to enable the application of the mitigation hierarchy and inform the FFG Act permit applications, if required. The Inquiry noted that DEECA was satisfied with the amendments made by the proponent to the EMF.

The Inquiry concluded benthic ecology and habitat impacts were appropriately assessed in the EES. The Inquiry noted, while the extent of the high-profile reef is not fully resolved, pre-construction surveys and avoidance measures (BHC-M01) appropriately require this to be addressed prior to final siting. The Inquiry considered that whilst complete avoidance of the predominantly ephemeral seagrass cover was not warranted, given the very limited level of impact predicted from Victorian works, the new mitigation measure to avoid where possible was appropriate. The Inquiry found the residual impacts would be negligible to minor and are acceptable.

I accept the Inquiry's conclusions on benthic ecology impacts. It is my assessment that the residual impacts are not significant and are acceptable.

Hydrocarbon spills

The EES acknowledged hydrocarbon spills present a risk to all sensitive receptors in the Victorian marine environment. The residual risk to benthic ecology, specifically FFG Act listed seagrass species being affected by an oil spill from a vessel collision, were assessed the highest risk, being rated medium. The EES considered all other residual risks low to very low. However, the proponent submitted the risk of a collision spill is remote and the Spill Response Plan (SPL-M02) would ensure a timely and appropriate approach.

While noting some limitations to the oil spill modelling undertaken, the Inquiry accepted the residual risk ratings from the EES and that an oil spill is a rare event for which the mitigation measures appropriately reduce the likelihood of occurrence and address the response in the event a spill occurs. The Inquiry recommended mitigation measure SPL-M02 should be amended (and various consequential updates to the

[19] Submission 40

EMF) to require consultation with the Department of Transport and Planning to ensure the Spill Response Plan aligns with the Victorian Marine Pollution Contingency Plan.

I accept the Inquiry's findings that the residual risks of an oil spill event were appropriately characterised. I agree with the Inquiry's assessment that proposed mitigation measures are appropriate and adopt the amendment to SPL-M02.

Marine biosecurity

The EES applied a risk-based framework to assess the risk of invasive species establishment from project activities. The EES found the greatest residual risk was for benthic ecology, being the worst-case scenario of invasive species affecting FFG Act listed species. For remaining receptors including benthic invertebrates and fish, the residual risk is low to very low.

Submitters were concerned with the introduction of invasive species, establishment of marine pests on hard substrate, the risk of new marine pests and bird flu risks.

Mr Stewart, expert for the proponent, gave evidence that instances of marine species incursion and establishment are rare and reiterated the residual risk ratings from the EES. Dr Greenwell, expert for the proponent, gave evidence the shore crossing location at Reeves Beach was selected, in part, due to its low bird numbers. Nevertheless, the proponent adopted Dr Greenwell's recommended amendment to FFM-M007 to include specific measures relating to bird flu.

The Inquiry was satisfied biosecurity risks had been appropriately assessed and the proposed mitigation measures satisfactorily mitigated risks for both invasive species and bird flu. I accept the Inquiry's findings.

Fish and invertebrates

The EES found that underwater noise generated by cable installation vessels would be localised and temporary, with most fish species expected to avoid disturbance areas. The EES considered impacts to fish populations, sharks, rays, invertebrates and plankton were negligible to minor. The EES found that vessel-related light, noise and disturbance could result in temporary, localised effects on some fish and invertebrate values, however residual impacts were assessed as negligible to minor and no significant impacts were predicted.

Seafood Industry Victoria[20] and Wildlife Coast Cruises Pty Ltd[21] were concerned fish would be displaced due to underwater noise and submitted there was uncertainty relating to the significance of cumulative underwater noise impacts.

Dr Mackie, expert for the proponent, agreed with the EES and noted the impact rating of negligible for habitat change in Victorian waters is appropriate for all fish groups except Syngnathids, for which the impact rating may be minor due to their ecology and conservation status[22].

The Inquiry accepted the EES findings and determined that impacts on fish and invertebrates can be appropriately managed through the proponent's proposed mitigation measures. It is my assessment that impacts to fish and invertebrates are not likely to be significant and are acceptable, with the implementation of the proposed mitigation measures.

Offshore ornithology and bats

The EES found that the Victorian marine works would result in no significant adverse impacts on shorebirds, coastal seabirds or bats. Construction and operational impacts, principally associated with vessel activity,

[20] Submission 27

[21] Submission 21

[22] Tabled document 30

artificial lighting, underwater noise and propellor strike, would be localised and readily managed through established mitigation measures and monitoring programs proposed in the EMF. The EES found residual impacts to be generally negligible to minor, with risks remaining low to very low.

Submissions relating to shorebirds and coastal seabirds focussed on impacts from the turbines themselves which are works outside of Victorian jurisdiction, and therefore a matter for the Commonwealth EIS process.

The Inquiry accepted the EES findings on the low level of impacts and determined the residual risks are acceptable, especially given the short and localised nature of exposure to project activity and disturbances. I accept the Inquiry's findings. It is my assessment that impacts to offshore ornithology and bats are not likely to be significant and are acceptable.

Marine mammals and turtles

The EES identified nine marine mammal species and one turtle species during visual surveys, and five marine mammal species through acoustic recordings. The EES stated the offshore export cable area within Victorian waters overlaps with Biologically Important Areas for two whale species; a foraging Biologically Important Areas for the Blue Whale and a reproduction Biologically Important Areas for the Southern Right Whale.

The EES found potential impacts would arise primarily from underwater noise generated by vessels undertaking cable installation activities, vessel strike and accidental spills. Modelling in the EES predicted noise effects would be localised and temporary and would not cause significant disruption to migration, breeding or foraging behaviour. The EES proposed mitigation measures which include marine fauna observers, species-specific exclusion zones, reduced vessel speeds, adaptive management procedures and seasonal restrictions within Southern Right Whale Biologically Important Areas. Additional residual risks were identified in relation to vessel strike, hydrocarbon spills, marine debris and accidental discharges, which the EES concluded would be low or very low.

DEECA submitted it was satisfied the EES adequately identified and assessed potential impacts to marine species. The principles of avoidance and minimisation had been applied where practicable, particularly in areas of high biodiversity and ecological value. DEECA supported the proposed mitigation measures including the preparation of a Marine Mammal and Turtle Monitoring and Management Plan (UWN-M06). However, DEECA recommended the EMF be updated to: include a new mitigation measure to reduce the risk of entanglement; UWN-M06 be amended to include the appointment of a dedicated Marine Fauna Observer; and that the Commonwealth Construction Underwater Noise Management Framework be explicitly applied to State waters as well. DEECA also sought the underwater noise framework to include a verification process for the model and an adaptive management framework should there be difference between the modelled and verified noise assessments.

The Dolphin Research Institute (DRI) submission[23] stated 'the EES seems rigorous and perhaps overcautious in its estimate of the number of cetacean species likely to frequent the zone of concern'. The submission noted the works in Victorian waters are comparatively shorter in duration and noise intensity, therefore the main risk to marine mammals is vessel strike. The submission also noted the 'EES applies a precautionary approach to reducing vessel speed or temporarily ceasing operations when whales or dolphins are in the vicinity. These are routinely accepted risk management strategies, and DRI considers these adequate to protect whales and dolphins during this component of the work in Victorian waters'. The submission requested four recommendations be included in Environmental Management Plans:

- skilled observers to detect whales,
- expansion of the protections for humpback whales given they will feed in State waters,
- publicly accessible and verified reporting during construction and operation, and

[23] Submission 45

- significant investment to achieve a greater understanding of the ecology of whales in our region and perhaps other nature-positive and community outcomes

In response to these submissions the proponent proposed amendments to UWN-M06, to require dedicated marine fauna observers, and LIT-M02, to require vessel lighting to comply with the Commonwealth guideline. The proponent also proposed new measures OFF-M23, requiring temporary mooring lines be subject to regular monitoring and not remain slack, and UWN-M16, to ensure alignment with Commonwealth policy procedures for minimising the risk of acoustic injury and biologically significant disturbance to marine mammals.

The Inquiry found the EES adequately assessed the impacts and risks associated with vessel presence and movements to marine mammals and turtles, including risk of vessel strike, artificial light spill, entanglement and propeller injury. The Inquiry considered the proponent's revised mitigation measures appropriate and residual impacts acceptable.

I generally accept the Inquiry's findings and consider the likely residual impacts to not be significant and therefore acceptable. However I note the proponent's amended mitigation measures do not explicitly set out a method for verification of underwater noise modelling or response framework should verified noise levels differ from model predictions as was requested by DEECA[24]. While I am satisfied that the proposed mitigation should be effective in avoiding significant impacts on marine mammals and turtles, there is merit in amending UWN-M16 (number updated to UWN-M17) to require verification of underwater noise predictions and the implementation of adaptive management should impacts be greater than predicted.

Marine protected areas

The EES noted that no project infrastructure is located within Victorian marine protected areas and that impacts are limited to indirect effects associated with vessel movements and shore crossing construction. There are eight Victorian marine protected areas within the region that are relevant to the assessment, of which the EES predicted the potential for Impacts to four; Corner Inlet Ramsar site, Corner Inlet Marine National Park, Corner Inlet Marine and Coastal Park, Nooramunga Marine and Coastal Park.

The EES found impacts were limited to underwater noise, physical disturbance and artificial light emissions from vessels transiting to and from construction ports, all of which were considered to have negligible consequence on marine protected area values. Risks from introduction of marine pests, accidental hydrocarbon spill from vessel collision and contaminated surface water from shore crossing construction all had low to very low residual risk to marine protected area values.

DEECA recommended[25] a new mitigation measure to stop works or movement from occurring within 1 km of Ninety Mile Beach Marine National Park, and establish appropriate controls to mitigate any indirect impacts from work occurring within 3 km of the Marine National Park. The proponent did not propose amendments in response to this recommendation, and the Inquiry noted DEECA did not raise this issue in comments on the proponent's revised mitigation measures. Furthermore the proponent noted the Ninety Mile Beach Marine National Park is over 20 km from the project area.

The Inquiry agreed residual risks to marine protected areas were assessed as low or very low, it noted that no Victorian works occur within any marine protected areas and the only impact pathway is vessel transit on prescribed routes through waters already carrying commercial shipping (i.e., indirect impacts). The Inquiry stated each indirect pathway is appropriately addressed by mitigation measures, no submitter or expert sought a change to the measures relied on for marine protected areas, and DEECA's concerns were adequately addressed.

[24] Table document 93

[25] Submission 40

The Inquiry found the EES to have included a robust description and evaluation of risk pathways, and was satisfied that indirect sources of potential impacts will not be significant for marine protected areas, and therefore the residual impacts are acceptable. I accept the Inquiry's findings.

Assessment

It is my assessment that:

- The project will not result in significant impacts on coastal processes, sediment transport or important coastal landforms.
- Impacts on benthic habitats, fish, invertebrates, seabirds, marine mammals and turtles are generally localised and minor, and can be appropriately managed through the proposed mitigation and monitoring framework.
- Risks associated with vessel strikes, invasive marine species, hydrocarbon spills and marine pollution can be readily managed to ensure they are not significant and acceptable, particularly through implementation of vessel management, biosecurity and spill response measures.
- As recommended by DEECA, there should be an appropriate method for verification of underwater noise modelling and adaptive management if levels are greater than predicted by the modelling in the EES. This should be reflected though an amendment to UWN-M16 (number updated to UWN-M17).
- With the implementation of the proposed mitigation, monitoring and adaptive management measures, the residual impacts on the Victorian marine environment and marine protected areas are not likely to be significant and are therefore acceptable.

5.1.3. Aboriginal cultural heritage

Effects on Aboriginal cultural heritage were addressed in chapters 13 and 19, and technical reports K and Z of the EES and Chapter 9 of the Inquiry report. The proponent proposed eight mitigation measures (ACH-M001 to ACH-M003, ACH-M005, SCH-M001 to SCH-M003 and SCH-M005) and two monitoring and contingency measures (SCH-M006 and SCH-M007) in response to effects on Aboriginal cultural heritage. The Inquiry recommended changes to two mitigation measures (ACH-M002 and ACH-M006) and other consequential changes to the EMF.

Assessment context

The EES identified the project as being within the Land and Sea Country of the Gunaikurnai People. The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) are the Registered Aboriginal Party (RAP) under the *Aboriginal Heritage Act 2006* and are responsible for considering whether or not to approve the Cultural Heritage Management Plan (CHMP) required for the project to proceed. The EES proposed ACH-M002 which committed the proponent to prepare a cultural values assessment (CVA). The CVA was prepared in conjunction with GLaWAC to assess potential impacts to intangible heritage places and values, and informed Technical report K.

The EES concluded onshore works would result in impacts to known Aboriginal cultural heritage values and places, with residual impact ratings ranging from severe to minor, while residual risks ranged from low to medium. The residual impacts were determined based on 'a conservative assessment that seeks to avoid assigning values or forecasting decisions for which GLaWAC are responsible for'. For submerged Aboriginal cultural heritage, residual impacts ranged from moderate to negligible, while residual risks ranged from low to very low. The EES also acknowledged that 'while a CHMP may permit harm, it does not reduce the consequence of that harm'.

A CVA was prepared in consultation with GLaWAC; there is potential for intangible Aboriginal heritage values to be managed as part of the CHMP, if desired by GLaWAC. The CVA was not exhibited with the EES, as it contains sensitive information.

Due to the proximity of the project to Bunurong Country, the EES recorded the proponent's previous engagement with Bunurong Land Council and Aboriginal Corporation (BLCAC) and commitment to further engagement in accordance with BLCAC's preference. BLCAC's inland boundary borders GLaWAC's inland boundary from Drouin to north of the Strezlecki highway just south of Mirboo North Regional Park[26].

Discussion

The key issues identified by the Inquiry and discussed in my assessment are whether:

- Impacts on Aboriginal cultural heritage can be appropriately avoided, minimised and managed,
- Proposed Traditional Owner engagement is adequate; and,
- A Cultural Values Assessment (CVA) should be undertaken in consultation with Bunurong Traditional Owners.

The Inquiry considered the assessment of Aboriginal cultural heritage presented in the EES was comprehensive and conservative, and had been prepared in consultation with GLaWAC as the relevant RAP. I agree with the Inquiry and consider that potential impacts to Aboriginal cultural heritage were appropriately assessed for the purpose of the EES. I note assessment of Aboriginal cultural heritage is ongoing and continuing through the preparation of a CHMP under the Aboriginal Heritage Act and subject to approval by GLaWAC as the RAP.

In its submission to the Inquiry, BLCAC stated its RAP administrative area 'does not necessarily represent the pre-colonial extent of Bunurong Country, which extended to Wilson's Promontory'. BLCAC also acknowledged the whole Star of the South Offshore Wind Farm is located within Gunaikurnai Country and not within Bunurong Country. Nevertheless, BLCAC submitted there were potential indirect impacts of the project on its Land and Sea Country, cultural values and communities' interests that needed to be addressed. BLCAC submitted that impacts on the interconnected cultural landscapes and values of the broader marine environment significant to Bunurong People had not been adequately assessed, and requested a CVA be prepared in consultation with BLCAC, as well as ongoing engagement and timely information sharing by the proponent.

In response to the submission, evidence and questions for the Inquiry, the proponent proposed[27]:

- a dedicated Traditional Owner Engagement Plan as a sub-plan of the CEMP and OEMP, and captured in a new mitigation measure (ACH-M006); and
- to work collaboratively with BLCAC in the preparation of a separate CVA in respect of the potential impacts of the whole Star of the South Offshore Wind Farm on Bunurong and advised it had written to BLCAC to discuss next steps.

The Inquiry accepted the new mitigation measure (ACH-M006) and proposed other minor drafting changes to mitigation measures proposed by the proponent[28]. The Inquiry also recommended minor changes to the EMF to ensure the Traditional Owner Engagement Plan is applied to all stages of the project and better reflects the intent of engagement.

I agree with the Inquiry and support the stand-alone Traditional Owner Engagement Plan proposed by ACH-M006, as well as the consequential recommendations of the Inquiry to ensure the plan applies to all project phases. I also accept the Inquiry's recommendation to remove reference to the Commonwealth Offshore Electricity Infrastructure Act as it is not relevant to the Victorian context.

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[26] Current RAP boundaries Aboriginal Cultural Heritage Register and Information System (ACHRIS) accessed at https://achris.vic.gov.au/#/onlinemap on 12 October 2026.

[27] Tabled document 107.

[28] Tabled document 107.

In relation to the CVA, the Inquiry referred to objectives of the MAC Act and associated Marine and Coastal Policy guidance acknowledging 'traditional owner groups' knowledge, rights and aspirations for land and sea country'. In doing so the Inquiry concluded that, 'in this context, the EMF should include a commitment to prepare a CVA with BLCAC'. While I support the proponent's commitment to collaborate with BLCAC to complete a separate CVA, I do not support the Inquiry's recommendation to document this as a requirement in the EMF. Formalising this as a statutory requirement under the proposed EMF under the proposed planning approval is not needed to meet the relevant objectives of the MAC Act.

As referenced in the Inquiry report, the objectives of the MAC Act refer to 'traditional owner groups' and 'specified Aboriginal parties', both terms have specific definitions under the Traditional Owner Settlement Act 2010 and the MAC Act, respectively. Considering these definitions and the fact that the project is solely located on Gunaikurnai Country including both on land and in marine waters, a BLCAC-led CVA is not required to meet the objectives of the MAC Act. However, the intent of the proponent to continue engaging with BLCAC and other relevant Traditional owners through its proposed Traditional Owner Engagement Plan is encouraged and I note this engagement may include a BLCAC-led CVA given the proponent's commitment to do so.

The Inquiry also acknowledged that the CVA is the 'current tool' for considering culturally significant species and assessing associated impacts, which the Inquiry found to be adequate. It noted that cultural values impact assessments may identify impacts on species, ecological communities, or cultural values through pathways that differ from those examined in ecological assessments, and therefore may not directly align with ecological impact findings. I support the Inquiry's findings that the CVA is an appropriate mechanism for consideration of culturally significant species.

Assessment

It is my assessment that:

- Potential impacts on Aboriginal cultural heritage can be managed via the CHMP to be considered by GLaWAC.
- The proposed Traditional Owner Engagement Plan is appropriate and should be implemented through all project phases.
- The EMF does not need to require a Bunurong-led CVA, although this could be an outcome of the proponent's engagement activities as part of the Traditional Owner Engagement Plan.
- When conducted, a CVA is an appropriate mechanism for consideration of culturally significant species.

5.1.4. Onshore noise and vibration

Onshore noise and vibration effects were addressed in Chapter 16 and Technical report W of the EES and Chapter 10 of the Inquiry's report. The proponent proposed seven mitigation measures (ONV-M001 to ONV-M005, ONV-M007 and ONV-M010) and two monitoring and contingency measures (ONV-M008 and ONV-M011) to address onshore noise and vibration effects. The Inquiry recommended changes to two mitigation measures (ONV-M002 and ONV-M005).

Assessment context

The EES defined sensitive receptors as residential areas, recreational sites and ecological habitats. The EES found construction activities, including trenching, shore crossings, batching plants and construction traffic, would generate temporary and localised noise impacts at nearby sensitive receptors. The most notable impact would be continuous 24-hour drilling works at the shore crossing location, which may occur for up to 18 months and has the potential to affect nearby residents and recreational visitors at the camping ground. The EES considered the residual construction noise impacts to be moderate and vibration impacts to be minor.

The EES concluded potential noise and vibration impacts during operations would be minor and impacts during decommissioning were assumed to be similar or less than construction.

The EES concluded there would be no significant impacts to human health and the environment from onshore noise and vibration as potential effects would be reduced as far as reasonably practicable in accordance with the general environmental duty.

Discussion

The key issues identified by the Inquiry and discussed in my assessment are whether:

- onshore noise and vibration impacts have been appropriately assessed,
- acceptable environmental outcomes can be achieved, and
- an environmental auditor is required to verify the justification for unavoidable works.

The Inquiry was satisfied that the onshore construction noise and vibration impacts on humans and buildings have been identified and quantified having regard to appropriate legislation, standards and guidelines. I agree with the Inquiry.

EPA recommended the mitigation measures for construction noise be amended to fully reflect guidance in EPA Publication 1834.2 but had no concerns with the technical aspects of the noise and vibration assessment.

Mr Evans, expert for the proponent, noted that while construction noise from the shore crossing activities are expected to be audible at the Reeves Beach residential areas, it would be at similar levels to the existing ambient environment and not have significant impacts on sensitive receptors.

The Inquiry accepted the evidence that the EMF adopts an 'all reasonably practicable' measures approach to mitigating noise or vibration impacts, which is consistent with EPA Victoria publication 1834.2 and the general environmental duty. I accept the Inquiry's findings, and consider the likely impacts from noise and vibration to not be significant and therefore be acceptable.

In response to EPA's submission[29], further correspondence[30], and recommendations from the proponent's expert Mr Evans[31], the proponent proposed[32] changes to mitigation measures ONV-M001 and ONV-M002. These changes included that the justification for unavoidable works would be reviewed and verified by a suitably qualified independent specialist.

The Inquiry considered an environmental auditor to be appropriate for taking on the role of a suitably qualified independent specialist. The Inquiry stated there are environmental auditors with appropriate skills available and that an auditor would be more accustomed to assessing compliance with EPA Victoria guidelines.

I accept the Inquiry's recommendation for an environmental auditor to replace the independent specialist in ONV-M002 and ONV-M005. I also recommend this change is made to ONV-M001 for consistency. Furthermore, I note the drafting in ONV-M001, ONV-M002 and ONV-M005 does not consistently indicate that this person be independent from the project and recommend this be made consistent.

In the context of my recommendation in Section 4, I recommend this review and verification check to be undertaken by the Independent Environmental Auditor.

[29] Submission 14

[30] Tabled documents 25 and 99

[31] Tabled document 37

[32] Tabled document 107

Assessment

It is my assessment that:

- Most onshore noise and vibration effects will be temporary, occurring from project construction and unlikely to be significant and therefore acceptable.
- There are unlikely to be any impacts of significance from noise and vibration for human health and the sensitive receptors in the surrounding environment, and are therefore acceptable.
- The justification for unavoidable works warrants independent scrutiny by an Independent Environmental Auditor.
- The recommendations of the Inquiry be adopted, as amended through this assessment.

5.1.5. Soil and waste

Soil and waste effects were addressed in Chapter 11 and Technical report J of the EES and Chapter 10 of the Inquiry's report. The proponent proposed twelve mitigation measures (SOL-M001 to SOL-M012) to address soil and waste, one of which (SOL-M005) was subject to a recommendation by the Inquiry.

Assessment context

The EES included a desktop contamination assessment which found historical and existing land uses across the study area have a low potential for broad scale environmental contamination, and contamination is not a significant concern in the study area. The EES acknowledged acid sulfate soils may be present, particularly in the coast area and near wetlands.

The EES concluded soil and waste impacts and risks would be greatest during construction. Onshore construction is expected to involve excavation of large quantities of waste spoil. The CEMP will include measures for appropriate offsite reuse and disposal locations.

The EES concluded residual impacts for soils and waste are expected to be negligible to minor and risks low.

Discussion

The key issues identified by the Inquiry and discussed in my assessment are whether:

- impacts from soil and waste from construction activities have been appropriately assessed, and
- all reasonable mitigation measures have been applied to achieve acceptable environmental outcomes.

In response to submissions from Wellington Shire Council[33] and evidence from its expert Mr Davidson[34], the proponent revised two mitigation measures[35] (SOL-M006 and SOL-M008) to update a reference to legislation and to require consultation with Council when preparing a disposal plan. Both amendments were adopted by the Inquiry.

No submissions raised material concerns about soil and waste management. The Inquiry was satisfied soil and waste had been appropriately assessed and will be managed through standard mitigation measures consistent with established requirements. The Inquiry agreed with the EES that residual impacts would be negligible to minor and risks low. I accept the Inquiry's findings.

The Inquiry considered it appropriate for an environmental auditor to review and verify the contractors' acid sulfate soil management plan meets relevant guidelines and recommended this be captured in SOL-M005. I accept the Inquiry's recommendation.

[33] Submission 20

[34] Tabled document 37

[35] Tabled document 107

In the context of my recommendation in Section 4, I recommend this review and verification check to be undertaken by the Independent Environmental Auditor.

Assessment

It is my assessment that:

- Likely impacts for soil and waste, most of which will occur during construction, are not significant and are acceptable.
- SOL-M005 be amended to require the acid sulfate soils management plan to be independently verified by an Independent Environmental Auditor.

5.2. Other Victorian matters

5.2.1. Business and tourism (including agriculture, forestry and fisheries)

Business and tourism, agriculture and forestry, and commercial and recreational fisheries were addressed in chapters 21, 12 and 25 and technical reports Q, S and N of the EES, respectively. These aspects are considered in Chapter 11 of the Inquiry's report. The proponent proposed several mitigation, monitoring and contingency measures across each aspect, specifically business and tourism (BTM-M001 to BTM-M006), agriculture and forestry (AGM-M001 to AGM-M005, AGM-M007 to AGM-M008) and fisheries (SOC-M003, CRF-M08, CRF-M09, SNV-M04, MEMP-M09 and EMI-M01). The Inquiry recommended changes to two of these measures (BTM-M005 and CRF-M08).

Assessment context

The EES focused on a local study area comprising the Foster, Longford-Loch Sport, Wilsons Promontory and Yarram statistical areas from the Australian Bureau of Statistics (ABS), and a regional study area consisting of the Latrobe-Gippsland ABS statistical area. The local area is characterised by farming, forestry, fishing, small towns, and nature reserves. Small businesses comprise 92 percent of the businesses in the study area. The tourism economy in the local area is centred on natural assets including Wilsons Promontory, Ninety Mile Beach, Nooramunga and Corner Inlet. Tourism contributes to the regional economy, supporting approximately 14,100 jobs across the Gippsland region, and generates an estimated $270 million in the local study area.

The EES identified temporary construction impacts associated with coastal tourism amenity, housing and accommodation demand, labour market disruptions, and traffic disruptions. The EES also identified positive contributions from the project to regional employment, local business and economic activity during construction. The EES concluded that most adverse effects for business and tourism would be negligible to minor with the implementation of the proposed mitigation measures, while impacts to visitation at the Reeves Beach campground and disruption to local housing and accommodation market would remain moderate during construction.

Submitters expressed concerns regarding potential impacts on commercial and charter fishing operations, recreational fishing activities, fish species, fish migration and marine habitats, and the consequent implications for fishing-related businesses and industries. Concerns were also raised regarding potential effects on tourism values and activities, including whale watching, recreational use of the marine environment and the broader visitor economy. Agricultural and forestry interests highlighted the need to appropriately manage impacts on productive land uses, landholder interests and the cumulative effects of supporting infrastructure. Conversely, several submissions identified opportunities for local employment, business participation and economic growth associated with the Project, including benefits for local industries, service providers and regional communities. Some submitters also noted the potential for offshore infrastructure to create marine habitat that may provide longer-term benefits for fisheries and associated recreational and commercial activities.

Discussion

The key issues considered by the Inquiry, and discussed in my assessment in relation to the aspects addressed in this section, are whether:

- impacts on commercial and recreational fisheries can be effectively minimised and managed through the proposed mitigation measures,
- the proposed mitigation measures provide an appropriate level of assurance that impacts on agricultural and forestry businesses can be effectively managed at the individual property level,
- the project delivers a net positive regional economic benefit, and,
- impacts on local businesses can be appropriately minimised and managed.

Business and tourism

The EES found that the project would generate substantial positive economic benefits through employment, business opportunities and regional investment. In particular, the EES identified the potential for the project to generate a positive outcome via new employment opportunities for communities that are shifting from fossil fuel-based industries,. The EES noted jobs in construction, engineering, logistics, administration and support services would be generated to support the project. In order to maximise these benefits, the EES proposed a Workforce Development Strategy (BTM-M005), which includes measures to maximise participation of local businesses and workers, support workforce training and skills development, and encourage procurement from regional suppliers.

The Inquiry agreed that the project is likely deliver a net positive regional economic benefit. However, the Inquiry stated that, while positive regional economic outcomes are beneficial, they do not necessarily offset negative impacts experienced by individual businesses. In response, the Inquiry proposed amending BTM-M005 to add a requirement to minimise competition for workers in areas or occupations experiencing labour shortages.

I support the Inquiry's view that there is an inherent tension between maximising local employment opportunities from the project and minimising competition for workers from existing local businesses, and acknowledge that local participation should be sought in a way that does not exacerbate existing local shortages. However I am conscious of the potential for a perverse outcome for the local community's experiences and reduced benefits and opportunities for employment in a new industry that could stem from the Inquiry's amendment to BTM-M005. As such, I accept the intent of the Inquiry's amendments, but rather than requiring the strategy minimises competition for local workers, I recommend BTM-M005 includes a specific measure to work with Councils and other stakeholders (such as business groups or local business directly) to balance the benefits from usage of local workers with the impacts to areas or occupations experiencing labour shortages.

Furthermore, when developing the Workforce Development Strategy, I encourage the proponent to draw on the specialist recommendations presented in EES Technical Report Q, whereby the strategy could require the project to work with suppliers to identify hard-to-source skills and develop strategies to attract the necessary workers or provide local training prior to, and as part of, the project.

Agriculture and forestry

The EES acknowledged that agriculture and forestry are significant industries within Gippsland, employing around 13 per cent of the regional workforce and generating more than $2.8 billion in annual production. The EES estimated that agricultural production losses would be minor in a regional context, representing less than 0.4 per cent of livestock production within the Latrobe-Gippsland region. It found that the project would cause some temporary and permanent impacts on agricultural output and disruption to farming operations. To manage these impacts, the EES proposes landholder-specific Property Management Plans (AGM-M002),

compensation for economic impacts (AGM-M001), and measures to maintain access, water supplies and ongoing farm operations during construction.

The EES determined 'plantation forestry production and economic impacts' as having the potential for moderate residual impact. This is due to the permanent loss of plantation forestry land within the transmission easement. Depending on the alignment option selected, between approximately 5.5 and 20.2 hectares of plantation forestry could be affected. This equates to approximately $71,000 (options AB and C) and $260,000 (Option D) of lost revenue throughout the life of the project. The EES indicated that plantation operators would be compensated for these production losses.

In response to the submission from DEECA, the proponent proposed a suitably qualified independent specialist review and verification of the implementation of Property Management Plans (AGM-M002). DEECA supported this change.

The Inquiry adopted the proponent's further refinement of the mitigation measures and made no further recommendations. I accept the proponent's proposed change to AGM-M002 and note this could be included in the scope of the Independent Environmental Auditor recommended in Section 4 of this assessment.

The Inquiry agreed with the EES that regional cumulative impacts are unlikely to be significant, although potential cumulative impacts on individual businesses and landowners were acknowledged. Nevertheless, ongoing consideration of these cumulative impacts is warranted given the further renewable energy projects being developed within the Gippsland Renewable Energy Zone. I accept the Inquiry's finding that residual impacts on agriculture and forestry are able to be minimised and acceptable outcomes can be achieved, with the effective implementation of the proposed mitigation.

Recreational boating and fishing

The EES assessed residual impacts on recreational boating and fishing as negligible to minor negative during both construction and operation. The EES considered recreational fishing and boating activities would be expected to continue largely uninterrupted over the long term.

The Inquiry was satisfied with the assessment of effects to commercial and recreational fisheries presented in the EES. However, the Inquiry agreed with submitters that the scope of eligible compensable impacts should extend beyond loss or damage to fishing gear. The Inquiry recommended changes to CRF-M08 to clarify the proposed scope and application of the Fisheries Liaison and Coexistence Plan. I accept the Inquiry's amendments as they provide greater certainty for commercial fishermen regarding the implementation of the plan and the management of project-related impacts.

Assessment

It is my assessment that:

- The project is expected to deliver a net positive regional economic benefit through employment, business opportunities and investment.
- Potential impacts on businesses and tourism, agriculture and forestry, and commercial and recreational fisheries can be appropriately minimised and managed through the proposed mitigation framework.
- Impacts can be minimised and acceptable outcomes can be achieved with the adoption of the mitigation measures and recommendations of the Inquiry, as amended through this assessment.
- I accept the intent of the Inquiry's amendment to BTM-M005, however I recommend it include a specific measure to work with Councils and other stakeholders (such as business groups or local business directly) to balance the benefits from usage of local workers with the impacts to areas or occupations experiencing labour shortages.
- The proposed suitably qualified independent specialist in AGM-M002 could be included in the scope of the recommended Independent Environmental Auditor discussed in Section 4 of this assessment.

5.2.2. Social

Social effects were addressed in Chapter 20 and Technical Report R of the EES and Chapter 13 of the Inquiry's report. The proponent proposed three mitigation measures (SOC-M001 to SOC-M003) and three monitoring and contingency measures (BTM-M003, BTM-M004 and BTM-M006) in response to social effects. The Inquiry recommended changes to one mitigation measure (SOC-M003).

Assessment context

The EES found the primary social effects of the project would be experienced during construction, with impacts concentrated around workforce accommodation and housing, recreational use of coastal and marine environments, temporary changes to coastal amenity at Reeves Beach, and disruption to rural landholders along the underground transmission corridor.

During operation, all impacts were assessed as negligible following implementation of the proposed mitigation measures. The EES also predicted positive social outcomes during the life of the project through employment generation, support for demographic sustainability and regional economic activity.

Submissions on the EES raised several social matters associated with the project, including potential pressures on local housing, health services and other community infrastructure arising from the project workforce. Specifically, Wellington Shire Council sought greater priority to be on the usage of temporary worker accommodation, and requested regular monitoring and reporting of short-term rental availability to identify and manage potential market saturation. Council sought a clear process to ensure that the project's use of existing accommodation does not exceed the 25% threshold the proponent committed to as part of its Workforce Accommodation Strategy (BTM-M005), including sufficient time to enable temporary accommodation to be approved and delivered before additional capacity is required.

More broadly, submissions raised concerns regarding effects on community amenity, recreation and wellbeing, as well as the potential industrialisation and changing character of the area. Submitters emphasised the importance of meaningful and ongoing community engagement, transparency and accountability in the delivery of mitigation measures, and ensuring that community benefits are appropriately targeted to affected local communities. Several submissions also identified potential positive socio-economic outcomes, including local employment and business opportunities, workforce development and investment in community benefits, with some submitters seeking measures to maximise and retain these benefits within the local area

Discussion

The key issues identified by the Inquiry and discussed in my assessment are whether:

- impacts from construction workforce demand on local accommodation can be appropriately avoided, minimised and managed with acceptable residual impacts,
- construction impacts on Reeves Beach campground users can be appropriately avoided, minimised and managed with acceptable residual impacts,
- temporary amenity impacts for rural landholders and nearby residents from construction noise, traffic and access restrictions are acceptable, and
- the proposed community benefit arrangements are sufficiently certain and implementable to provide appropriate benefits to communities affected by the project.

Workforce accommodation

The EES considered the potential for impacts of the project workforce on housing availability and affordability, and capacity of local services, concluding that, if unmitigated, impacts would be moderate. In response, the proponent proposes the development and implementation of a Workforce Accommodation Strategy (WAS) (SOC-M001 and BTM-M006) which:

- includes a hierarchy of measures including reducing peak demand, local workforce recruitment, capped use of existing rental and short-stay accommodation and provision of alternative or project-specific temporary accommodation where required, and
- proposes monitoring of projected and actual workforce accommodation use and housing availability, with further measures in the accommodation hierarchy to be implemented where impacts are identified.

With the implementation of mitigation measures the EES assessed the residual impact to range from moderate positive to minor negative. The EES states that the Workforce Accommodation Strategy will be further developed post approval in collaboration with construction contractors, councils and accommodation providers once a detailed construction schedule and worker numbers are known.

The Inquiry found that the Workforce Accommodation Strategy demonstrates an appropriate approach to managing these impacts. However, the Inquiry recommended that BTM-M006 expressly include requirements around monitoring and reporting, appropriate thresholds or triggers for action, contingency measures that include consideration of cumulative impacts, and consultation with relevant Councils and accommodation providers. I accept the Inquiry's recommendation, and I support measures to ensure the Workforce Accommodation Strategy is able to adapt to changes in regional workforce and accommodation demand as it continues to be developed.

Reeves Beach campground

The EES states that the most significant impact on coastal amenity would occur during the temporary shore crossing construction works at the Reeves Beach free campground. The campground is managed by Parks Victoria and provides approximately 30 informal campsites. The EES predicted that construction noise associated with this work and other concurrent construction processes would make the campground unattractive for up to 18 months. It concluded that some holidaymakers may choose to relocate to other nearby campgrounds as a result of these impacts, increasing demand at these sites and contributing to capacity constraints during peak periods. The EES assessed the residual impact to be moderate.

A number of submissions raised concerns regarding visual amenity, coastal character, recreational values and the attractiveness of Gippsland's coastline. Submitters emphasised the importance of relatively undeveloped coastal landscapes to local identity, visitor experiences and community wellbeing.

The proponent revised mitigation measure SOC-M003 in response to Wellington Shire Council's submission, to include requirements for ongoing communication with Reeves Beach campground users regarding project activities and the impacts they will have on the campground. In addition, BTM-M004 requires consultation with Parks Victoria regarding construction noise and activities, including the provision of information and resources to support notification of campground users and, where necessary, the promotion of alternative camping locations.

The Inquiry accepted that construction impacts on users of the Reeves Beach campground cannot be avoided, finding they can be appropriately minimised and managed through the proposed mitigation measures. Subject to its recommendations to SOC-M003 and BTM-M004, the Inquiry was satisfied that the residual impacts on campground users would be acceptable.

I accept the Inquiry's recommendations that will ensure Council involvement and appropriate engagement is conducted to reduce impacts on users of the Reeves Beech campground. I also agree that shore crossing construction would temporarily diminish amenity for some users of Reeves Beach and surrounding coastal

areas. However, the effects would be temporary, spatially limited and appropriately managed through stakeholder engagement and advance communication. While this is a notable adverse social effect, as identified within the EES, I agree with the Inquiry's conclusion that it can be managed to an acceptable level.

Rural landholders and local communities

The EES found that construction of the underground cable system would affect up to 25 properties through temporary disruption of farming operations, access arrangements and local travel. The EES concluded this would result in minor negative impacts on landholders and nearby residents from construction noise, traffic, temporary road closures and restrictions on land access. The EES proposes to implement Property Management Plans (AGM-M002) and compensation arrangements to minimise these effects. In response to DEECA's submission, the proponent revised this mitigation measure to include the requirement of a suitably qualified agricultural specialist to verify the implementation of the Property Management Plan.

A number of submissions highlighted concerns regarding construction-related disruptions, impacts on farming operations, road access, emergency access and broader changes to rural amenity.

I accept the findings of the EES on this matter, and given the underground design of the transmission infrastructure, support the use of Property Management Plans, compensation provisions and the proponent's rehabilitation commitments (AGM-M004). I consider these impacts will be localised and manageable, and the residual effects on rural landholders and nearby communities are acceptable.

Community benefits

The EES proposed to develop and implement a community benefit fund (BTM-M003) which would share the benefits of the project with communities directly affected by the project. The EES stated that the fund would be developed in consultation with the community and councils.

Submissions to the Inquiry broadly supported the proposed community benefit sharing approach but raised concerns about its operation and implementation. Several submitters stressed the importance of ongoing community engagement, transparency, independent monitoring and provision of community benefits. Wellington Shire Council, South Gippsland Shire Council, the Gippsland Climate Change Network and the Gippsland Coastal Assembly all emphasised the importance of maintaining community confidence through effective engagement and ensuring that local communities share in project benefits.

The proponent advised that in addition to BTM-M003 it was committed to implementing a broader Community Benefit Program, though it is not required in the proposed EMF. This broader program would be developed consistent with best practice guidance and would align with the core principles in the *Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria: a guide for renewable energy developers*. The proponent committed to investing in the local area and prioritising local employment and supply opportunities where possible to maximise local benefits.

The Inquiry accepted that BTM-M003 generally aligned with the principles of the *Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria: a guide for renewable energy developers*. The Inquiry accepted that the community benefit fund must retain a degree of flexibility while detailed arrangements are determined. However, the Inquiry recommended that BTM-M003 require the arrangements for administration and approval of funding, be outlined and worked on in consultation with community and councils. I accept the Inquiry's recommendations.

Assessment

It is my assessment that:

- The project will give rise to both positive and adverse social effects although these are not expected to be significant.

- Positive benefits include increased employment opportunities, community benefits and increased local expenditure, whereas the adverse impacts include temporary pressure on local housing and accommodation, disruption to recreational users at Reeves Beach Campground, and temporary amenity impacts for rural landholders and nearby residents.
- I accept the Inquiry's amendment to BTM-M006 and note that at this time, the other proposed projects in the region are at early stages of planning and therefore the framework outlined adequately allows for flexibility in response to changing workforce accommodation requirements.
- I also accept the Inquiry's amendments to SOC-M003, AGM-M002 and BTM-M003.
- The residual impacts are acceptable with the adoption of the mitigation measures and recommendations of the Inquiry, as amended through this assessment.

5.2.3. Traffic and transport

Traffic and transport effects were addressed in Chapter 17 and Technical Report X of the EES and Chapter 14 of the Inquiry's report. The proponent proposed five mitigation measures (TTP-M001 to TTP-M005) to address traffic and transport effects. The Inquiry recommended changes to one mitigation measure (TTP-M002).

Assessment context

The study area for the EES comprised local and regional roads expected to accommodate construction and operational traffic from the project, including the onshore transmission infrastructure and associated staging nodes. Key roads assessed included major arterial routes such as the South Gippsland Highway, Hyland Highway and Princes Freeway, as well as local council-managed roads including Balloong Road, Dewars Road and other rural access roads. These roads were identified as the primary routes that would be used to access and support construction of the project.

The EES found that traffic and transport impacts would be concentrated during construction of the project and would primarily relate to increased traffic volumes, heavy vehicle movements, temporary road and lane closures, road safety risks and potential impacts on local road conditions. During construction, up to approximately 1,576 daily one-way vehicle trips and 363 peak-hour trips could be generated. The assessment stated that the existing road network has sufficient capacity to accommodate construction traffic, with all roads expected to operate within capacity limits.

The EES concluded that residual impacts to traffic and transport were minor, with impacts limited to the local road network during construction period. Temporary impacts associated with road closures, heavy vehicle traffic, public transport, pedestrian and cyclist safety, and road condition are expected to be localised and short-term.

Discussion

The key issues considered by the Inquiry, and discussed in my assessment, are whether:

- impacts have been appropriately assessed, and
- impacts can be appropriately managed to avoid, or minimise where avoidance is not possible, and adverse effects on community amenity and safety are acceptable.

In its submission, Wellington Shire Council sought greater clarity regarding its role in reviewing and approving the Traffic Management Plan and any works affecting Council-managed roads, and requested involvement in the development of the Stakeholder Engagement Plan.

In response, the proponent revised TTP-M001 to explicitly include Council in the Stakeholder Engagement Plan, but did not propose changes to TTP-M002 as Council already has approval and management powers under the *Road Management Act 2004*. The Inquiry accepted the proponent's response on both matters,

noting changes to TTP-M002 are unnecessary as they would effectively replicate the powers conferred on Council and other road managers by the Road Management Act. I accept the Inquiry's findings.

DEECA's submission raised concerns about the potential for construction traffic and temporary road closures to affect emergency response capability, particularly access for firefighting vehicles, heavy plant and management of the Jack Smith Lake Wildlife Reserve. DEECA recommended additional mitigation measures relating to high fire danger periods, firefighting equipment and workforce preparedness, and requested advance notification of construction activities and any road closures or disruptions to the road network to support emergency planning and land management activities.

In response, the proponent proposed new mitigation measure UWN-M16 and refined TTP-M002 to include protocols to ensure Parks Victoria and DEECA are notified two months prior to commencement of works on public land, including in relation to potential road closures and impacts to the road network. The Inquiry concluded that the changes agreed by the proponent in response to DEECA appropriately address the concerns raised in the submissions regarding emergency and fire access. I accept the Inquiry's findings.

Overall, the Inquiry was satisfied that the traffic and transport impacts were adequately assessed by the EES, and that it provided a comprehensive analysis of existing conditions, potential impacts and mitigation measures. I accept the Inquiry's findings that the impacts can be appropriately minimised and managed, and the residual impacts are acceptable.

The Inquiry recommended amending TTP-M002 to require the Traffic Management Plan be prepared prior to the commencement of construction and implemented throughout the construction phase. I accept the Inquiry's amendment, as it provides greater certainty that traffic impacts will be appropriately planned for, managed and communicated before construction activities begin.

Assessment

It is my assessment that:

- The traffic and transport impacts concentrated during the construction stage are not likely to be significant and can be minimised through the proposed mitigation.
- TTP-M002 be amended consistent with the Inquiry's recommendation, as it provides greater certainty that traffic impacts will be appropriately planned for, managed and communicated before construction activities begin.
- The proposed traffic and transport mitigation measures provide an appropriate framework to avoid, minimise and manage these impacts.
- The residual impacts are acceptable with the adoption of the mitigation measures and recommendations of the Inquiry, as amended through this assessment.

5.3. Other Victorian localised effects

Assessments of air quality, historic heritage, onshore electromagnetic field exposure and landscape and visual amenity effects presented in the EES found that impacts were localised and not significant, and subsequently these were not examined by the Inquiry.

Table 5 outlines the findings from the EES relating to these effects and their significance, and the proposed management controls. I support the findings of the EES in relation to these effects and consider that they can be effectively managed through well-established practices including the proponent's proposed mitigation measures.

Table 5: Other effects

EES findings and submissions	Minister's assessment
Air Quality (EES Chapter 18 and Technical Report Y) The EES considered residual impacts to air quality at all sensitive receptors to be short term, localised and negligible across all phases of the project. Mitigation measures include dust control and suppression using water sprays or water carts, vehicle speed and movement restrictions, covering vehicle loads, stabilisation of access tracks, weather monitoring, observational dust monitoring, equipment maintenance and emission control. No submitters raised specific concerns about potential effects to air quality.	I support the findings of the EES and consider that the mitigation measures are adequate to manage potential effects to air quality to acceptable levels.
Historic Heritage (EES Chapter 14, Technical Report L and Technical Report M) The EES found no known statutory listed historical heritage places within the project area and concluded that residual impacts to known and unknown historic heritage values would be negligible to minor during all phases of the project. The EES considered there was potential for cumulative offshore effects associated with overlap of the cable route area with one other offshore wind project, but noted that this would depend on whether the historic heritage values are confirmed to be present, as well as the final cable routes for both projects. Mitigation measures include heritage awareness training, heritage no-go zones, unexpected finds protocols, further underwater cultural heritage investigations, archaeological exclusion zones, site-specific investigations and preparation of an Underwater Cultural Heritage Management Plan. No submitters raised specific concerns about potential effects to historic heritage values from the project.	I support the findings of the EES and consider that the mitigation measures are adequate to manage potential effects to historic heritage to acceptable levels.
Onshore Electromagnetic Field Exposure (EES Chapter 15 and Technical Report V) The EES defines electromagnetic fields as an umbrella term for interrelated electric fields and magnetic fields. Electric fields relate to the voltage, which is the force that drives power along the transmission line or cable. Magnetic fields relate to the current, which is the flow of power along the transmission line or cable. The EES found that following implementation of mitigation measures including avoidance and design optimisation and verification in accordance with the Energy Networks Australia EMF Management Handbook, the residual impacts were assessed as negligible to minor. Some submitters raised concerns about the potential impact to humans from electromagnetic fields.	I support the findings of the EES and consider that the mitigation measures are adequate to manage potential effects associated with electromagnetic field exposure to acceptable levels.

EES findings and submissions	Minister's assessment
Landscape and visual amenity (EES Chapter 20 and Technical Report U) The EES found the project would result in temporary, localised impacts to landscape and visual amenity during construction, principally at Reeves Beach and along sections of the underground transmission corridor where construction compounds, drilling works, trenching and associated activities would temporarily affect coastal and rural amenity. The EES noted these impacts are generally reversible and reduce substantially following rehabilitation, and given the transmission infrastructure is underground and only minor surface features remain visible, long-term operational landscape and visual effects from Victorian works are expected to be negligible and not result in any significant permanent change to landscape character or visual amenity.	I support the findings of the EES, and consider that the mitigation measures are adequate to manage potential effects associated with landscape and visual amenity to acceptable levels.

6. Conclusions

I consider that the environmental effects of the works proposed within Victorian jurisdiction on the Victorian environment have been sufficiently examined through the EES process and are acceptable. Most of the potential effects are not likely to be significant and can be managed with implementation of the proposed EMF and mitigation measures, with refinements consistent with the recommendations of this assessment.

My assessment draws on the analysis within the EES, the Inquiry's report, public submissions on the EES, documents tabled, and consolidates the assessment and findings on the likely effects and their acceptability.

I concur with the Inquiry's conclusion that the project's works proposed within Victoria, examined in the EES, can proceed with acceptable environmental effects and outcomes. There are likely to be some environmental impacts, however these can be effectively mitigated or managed, considering their extent, nature, and expected duration, with the effective implementation of the proposed EMF and mitigation measures, as refined through this assessment.

Decision-makers need to consider this assessment before deciding whether and how the project should proceed. As a matter of good practice, I also expect decision-makers to write to me to advise how my assessment was considered and applied.

Table 6 summarises my response to the Inquiry's key recommendations as provided in Section 5.2 of the Inquiry's report. My detailed recommendations relating to each mitigation measure are outlined in Appendix A.

Table 6: Response to Inquiry's key recommendations

ID	Inquiry key recommendations		Minister's assessment	Section of this assessment
Overarching recommendations				
1.	**If the Project proceeds, the Inquiry recommends:** • Amend the Environmental Management Framework as shown at Appendix H of this Report, subject to reviewing for consistency and to address any consequential changes resulting from other recommendations in this Report. • Amend the draft Incorporated Document as shown at Appendix I of this Report, subject to addressing any consequential changes resulting from other recommendations in this Report.		Accept, subject to recommendations of my assessment, particularly noting I do not support removing the VicGrid connection hub study area from the SCO. I recommend the EMF require an Independent Environmental Auditor to review environmental management plans, and ensure compliance with the mitigation measures and commitments of the EMF and incorporated document.	Section 4 and Section 5
Key Victorian matters				
Onshore ecology				
2.	**Native vegetation**	Amend the Environmental Management Framework as follows: a) Amend FFM-M001 (Avoidance of impacts to ecological values during the design phase) to add: *Where available and practicable native vegetation offsets shall be sourced from*	I support the intent of the Inquiry's recommendation, and encourage the proponent to locate offsets as close to the project area as practicable, however I do not accept this amendment as it is inconsistent with state policy.	Section 5.1.1

ID	Inquiry key recommendations		Minister's assessment	Section of this assessment
		within Wellington Shire Council local government area.		
3.	**Threatened flora**	Amend the Environmental Management Framework as follows: a) Amend FFM-M013 (Site reinstatement and rehabilitation) to include actions to develop appropriate compensatory measures for the direct loss of Pale Swamp Everlasting and Coast Grey-box.	Accept, and recommend measure includes a requirement for locally indigenous plants known to be favoured food for the New Holland Mouse and Orange-bellied Parrot to be prioritised for planting in impacted habitat areas, as far as practicable and subject to landowner consents.	Section 5.1.1
4.	**Koala**	Amend the Environmental Management Framework as follows: a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to include identification of zones to reduce speed limits in areas of extensive koala habitat	Accept.	Section 5.1.1
5.	**Habitat loss and degradation**	Amend the Environmental Management Framework as follows: a) Amend FFM-M006 (Minimise disturbance, injury, or death of wildlife) to require an artificial hollow program to be developed in consultation with the Department of Energy, Environment and Climate Action and which documents the actual hollow losses, specifies the replacement ratio and the artificial hollow type or types to be used, records the number and location of artificial hollows and provides for an audit on the program.	Accept.	Section 5.1.1
Victorian marine environment and marine protected areas				
6.	**Oil spill**	Amend the Environmental Management Framework as follows: a) Amend Mitigation Measure SPL-M02 (Spill Response Plan) to require the Spill Response Plan to be prepared in consultation with the Department of Transport and Planning, and update Table 26-4 (List of CEMP sub plans and other management documents) and Table 26-6 (List of OEMP sub plans and other management documents) accordingly.	Accept.	Section 5.1.2

ID	Inquiry key recommendations		Minister's assessment	Section of this assessment
Coastal processes				
7.	**Coastal processes**	Amend the Environmental Management Framework as follows: a) Include mitigation measure MEMP-M05 (Coastal monitoring) (unless a similar mitigation measure is included in the Commonwealth Environmental Management Framework) as shown in the recommended Environmental Management Framework, and specify that the monitoring should continue for the operational life of the Project.	Not accepted. Given the evidence that the Victorian works are very unlikely to have any material impacts on coastal processes, I do not support reinstating MEMP-M05.	Section 5.1.2
Aboriginal cultural heritage				
8.	**Aboriginal cultural heritage**	Amend the Environmental Management Framework as follows: a) Amend Section 26.5.3 (Decommissioning) to refer to updating and implementing the Traditional Owner Engagement Plan. b) Amend ACH-M006 (Traditional Owner Engagement Plan) to ensure the 'mitigation outcome' refers to engagement, and to require the measure be applied through all stages of the Project including pre-construction and decommissioning. c) Amend ACH-M002 (Cultural Values Assessment) to require a Cultural Values Assessment be prepared before construction commences in conjunction with Bunurong Land Council Aboriginal Corporation as relevant to the Project. d) Remove references to the "OEI Act" [Offshore Electricity Infrastructure Act 2021 (Cth)].	Partially accept, noting I do not endorse item c).	Section 5.1.3
Onshore construction impacts				
9.	**Onshore construction noise and vibration**	Amend the Environmental Management Framework as follows: a) Amend ONV-M002 (Out of hours construction noise mitigation measures) to specify that an environmental auditor reviews and verifies that all planned and unplanned night-time works are justified in accordance with EPA Publication 1834.2 and that all reasonable work practices have been considered.	Accept. I also recommend ONV-M001 is amended to require an environmental auditor. I note ONV-M001, ONV-M002 and ONV-M005 do not consistently indicate that the auditor be independent from the project and recommend this be made consistent.	Section 5.1.4

ID	Inquiry key recommendations		Minister's assessment	Section of this assessment
		b) Amend ONV-M005 (Unavoidable works – Shore crossing drilling – noise control) to specify an environmental auditor reviews and verifies that all night-time works have been justified in accordance with Section 4.4 of EPA Publication 1834.2, and that all reasonably practicable work practices have been considered.	As discussed in Section 4.2.2, the role and scope of the Independent Environmental Auditor I have recommended may include responsibility of the environmental auditor.	
10.	**Soil and waste**	Amend the Environmental Management Framework as follows: a) Amend SOL-M005 (Management of Acid Sulfate Soil) to require the Acid Sulfate Soils Management Plan be prepared prior to construction, implemented during construction, and be reviewed and verified by an environmental auditor as complying with the relevant guidelines and legislation.	Accept. As discussed in Section 4.2.2, the role and scope of the Independent Environmental Auditor I have recommended may include responsibility of the environmental auditor.	Section 5.1.5
Other Victorian Matters				
Business and tourism				
11.	**Local businesses**	Amend the Environmental Management Framework as follows: a) Amend BTM-M005 (Workforce Development Strategy) to require minimisation of local labour workforce competition and consider cumulative impacts on the workforce demand and measures to reduce impacts on local businesses if required.	Accept the intent, but rather than requiring the strategy minimises competition for local workers, I recommend a specific measure to work with Councils and other stakeholders (such as business groups or local business directly) to balance the benefits from usage of local workers with the impacts to areas or occupations experiencing labour shortages.	Section 5.2.1
12.	**Agriculture and forestry**	No recommendations	As discussed in Section 4.2.2, the role and scope of the Independent Environmental Auditor I have recommended could be broad enough to encompass the role of independent agricultural specialist specified in AGM-M002.	Section 5.2.1
13.	**Commercial and recreational fisheries**	Amend the Environmental Management Framework as follows: a) Amend CRF-M08 (Compensation for impacted commercial fishers) and specifically the Fisheries Liaison and Coexistence Plan, by clarifying when	Accept.	Section 5.2.1

ID		Inquiry key recommendations	Minister's assessment	Section of this assessment
		the plan applies, how it relates to the other management plans, the notification requirements and parameters for the compensation process.		
Social				
14.	**Workforce accommodation**	Amend the Environmental Management Framework as follows: a) Amend BTM-M006 (Workforce Accommodation Strategy) to expressly require the strategy include requirements around monitoring and reporting, thresholds or triggers for action and contingency measures that include consideration of cumulative impacts.	Accept.	Section 5.2.2
15.	**Reeves Beach campground**	Amend the Environmental Management Framework as follows: a) Amend SOC-M003 (Stakeholder Engagement Plan) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change. b) Amend BTM-M004 (Consultation with Parks Victoria) to require notification be provided sufficiently in advance of affected periods and updated if construction timing or impacts change.	Accept.	Section 5.2.2
16.	**Community benefits**	Amend the Environmental Management Framework as follows: a) Amend BTM-M003 (Develop and implement a community benefit fund) to require the governance structure, including arrangements for administration and approval of funding, to be co-designed with the beneficiary communities and Councils.	Accept.	Section 5.2.2
Traffic and transport				
17.	**Transport**	Amend the Environmental Management Framework as follows: a) Amend TTP-M002 (Traffic management plan) to require preparation of the Traffic Management Plan pre-construction, and implementation during construction.	Accept.	Section 5.2.3

ID	Inquiry key recommendations		Minister's assessment	Section of this assessment
Land use impacts				
18.	**VicGrid connection hub**	Amend the draft Incorporated Document as follows: a) Remove references to VicGrid connection hub works and approvals. b) Amend the draft Wellington Planning Scheme Amendment C129well maps to remove the VicGrid connection hub site.	Not accepted.	Section 4.1.1
19.	**Landowner impacts**	Amend the draft Incorporated Document as follows: a) Amend Clause 6.4 to include expressly list affected landowners as parties to consult regarding changes to the Alignment Plan. b) Add a new Clause which states: *The control in this Incorporated Document ceases to apply to any Project Land that is not included in the endorsed Alignment Plan, 12 months after registration of all required easements on property titles where the Project is located, unless otherwise agreed in writing by the Minister for Planning.*	Accept.	Section 4.1.2

Source: adapted from Chapter 5.2 of Inquiry's report.

HON SONYA KILKENNY MP
Minister for Planning

Date: 02/11/2026

Appendix A – Recommendations to mitigation measures

The Inquiry recommended specific changes to the EMF and several mitigation measures in response to submissions, the submitter conference and through their analysis of the issues. Section 4 of this assessment outlines the Inquiry's key findings and recommendations relating to the EMF and my response. Further to this, Section 5 of this assessment sets out where I support and/or recommend further changes to the mitigation measures considered by the Inquiry.

Table A1 and Table A2 contain the proponent's 'final day' version of proposed mitigation measures that was tabled at the submitter conference (Tabled document 107) and incorporates recommended changes from the Inquiry denoted as either 'additions' or ~~'deletions'~~.

I endorse the measures presented in Table A1 and Table A2 (including changes recommended by the Inquiry), except where qualified in the 'Minister's assessment' column of either table. Further details regarding my findings and recommendations in these tables is contained in Section 5 of this report.

The Inquiry also recommended minor changes to columns labelled 'Title' and 'Mitigation outcome' (see Table 26-7 in Inquiry's report). These columns are not replicated in Table A1 in this appendix, however I accept each of these minor amendments and recommend they are reflected in the proponent's final EMF.

Table A1: Recommended changes to mitigation measures

Measure ID	Description	Performance indicator	Stage	Minister's assessment
Onshore ecology				
FFM-M001	Avoidance of impacts during design • Seek opportunities to avoid and minimise impacts on ecological values during further design and construction planning, including exploring whether trenchless design is possible and reasonably practicable in high value areas. • Prioritise avoidance and minimisation in areas such as Lyons Road, Woodside H28 Bushland Reserve, waterways and hollow bearing trees to minimise impacts to high quality native vegetation and threatened fauna habitat and minimise habitat fragmentation. Additional surveys to inform design and update ecological value information • Confirm the adequacy of ecological survey information, and carry out further surveys where required, to inform design and construction planning. This will include undertaking on-ground ecology surveys in areas previously inaccessible. Surveys will include Vegetation Quality Assessments (VQA), mapping of native vegetation (including threatened ecological communities,	Updated Environmental Line List.	Prior to construction	I do not accept the Inquiry's amendment as it is inconsistent with state policy.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	if present), identification of threatened flora and fauna habitat, and targeted survey for threatened flora and fauna if relevant (or assume presence in suitable habitat for mobile species and species with a limited seasonal survey period). Targeted surveys (or assumed presence) for threatened species should include, consideration of Glossy Grass Skink, Swamp Skink, Martin's Toadlet and Southern Toadlet if habitat for these species is proposed to be impacted. • Identify tree notional root zones of all native trees to be retained in accordance with the Assessor's Handbook (DEECA 2025) • Update mapping to include the outcomes of pre-construction surveys, no go zones, notional root zones, updated construction footprint and tree protection zones. • Verify site condition scores by a DEECA accredited assessor when VQA data is more than three years old for grassy, heathland, shrubland ecosystems and five years for woodland and forest ecosystems. • Update calculation of native vegetation impacts and offset requirements if required. • Updates to the design and ecology values and impacts will be provided to the Department of Energy, Environment and Climate Action. • Update Environmental Line List (FFM-M002) to reflect any changes to ecological values that occur within the project area, particularly in areas previously inaccessible. • Update Flora and Fauna Management Plan (FFM-M005) to reflect any changes to No-Go Zones and identification of threatened species (including assumed presence) and associated habitat. The above will be undertaken in consultation with DEECA. Where available and practicable, compliant third-party offsets shall be prioritised to be sourced from within Wellington Shire Council local government area.			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
FFM-M002	Prepare an Environmental Line List (ELL) which identifies all ecological values that occur within the project area (based on ecological values identified in accordance with FFM-M001) prior to construction commencing. The ELL will define all prescribed mitigation or management requirements associated with each identified value. The ELL will be incorporated in the detailed environmental management plans and will be referred to when completing detailed construction planning. The ELL will be prepared in consultation with the Department of Energy, Environment and Climate Action and reviewed on a regular basis.	Development of an Environmental Line List.	Prior to construction (prepare ELL) Construction (implement ELL) Operation (implement ELL) Decommissioning (implement ELL)	
FFM-M003	Prepare and implement a Construction Environmental Management Plan (CEMP) to define measures to manage biodiversity values, air quality, noise, site contamination, waste, water quality and monitoring to minimise construction activities impacting on the environment in consultation with the Department of Energy, Environment and Climate Action and West Gippsland Catchment Management Authority with respect to surface water measures. An audit framework and emergency response procedure will be included in the plan. Specific controls for protecting ecological values not defined by the CEMP will be outlined in sub-plans to the CEMP including: • Flora and Fauna Management Plan (FFM-M005, FFM-M006) to define measures to protect retained ecological values during construction and outline control measures to minimise risk of disturbance, injury or death of fauna. • Biosecurity Management Plan (FFM-M007) to define measures to manage and control biosecurity threats (weeds, pathogens, and pest animals). • Management plans to reduce erosion, sedimentation and contamination risk to retained vegetation and habitat including waterways (FFM-M008). • Protocol for works within Conservation Reserves (FFM-M009). • Protocol for incidental discovery of threatened flora and fauna species. • Designated Waterway Crossing Management Plan (FFM-M010) to describe how the project will manage and control impacts on designated waterways during construction.	Development of a Construction Environmental Management Plan.	Prior to construction (prepare) Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Rehabilitation and Reinstatement Plan (FFM-M013) to guide the approach to rehabilitation following the completion of construction in conservation reserves and roadsides / waterways that support remnant vegetation.			
FFM-M004	Provide inductions and training to ensure contractors are aware of areas of ecological value along the alignment and the mitigation measures required for construction activities. Provide reference material such as environmental management plans and maps at the site office during construction.	Project Induction records.	Prior to construction (prepare) Construction Operation Decommissioning	
FFM-M005	Prepare and implement a Flora and Fauna Management Plan (FFMP) to identify significant ecological values to be retained (native vegetation and threatened species habitat, Large Trees in Patches, Scattered Trees) including in areas previously inaccessible and define measures to protect those values during construction. The FFMP will be developed in consultation with the Department of Energy, Environment and Climate Action and will include: • No-Go Zones where works are not permitted to protect sites of known significant ecological values to be retained. No Go Zones to be placed on boundary of project area and around scattered trees, large patch trees and habitat trees where project area encroaches > 10% of Notional Root Zones (NRZ) as per AS 4970-2025 Protection of Trees on Development Sites. • Clear demarcation of No-Go Zones and NRZs on maps and construction drawings. • Protection of No-Go Zones and NRZs with temporary fencing and signage; fencing will be installed and removed in a staged manner as construction progresses along the linear alignment. • Pre-construction inspections by a Site Environmental Manager (or similar) to confirm that native vegetation and trees to be retained have been adequately protected from impact. • Conduct regular inspection and maintenance of fencing during construction to ensure continued integrity. • Performance targets and contingency measures.	Development of a Construction Environmental Management Plan including the sub plan - Flora and Fauna Management Plan.	Prior to construction (prepare) Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
FFM-M006	• Prepare and implement a Flora and Fauna Management Plan (FFMP) which outlines control measures to minimise risk of disturbance, injury or death of fauna. The FFMP will be developed in consultation with the Department of Energy, Environment and Climate Action and include measures to: • Manage any open pits or trenches to reduce potential for fauna entrapment in accordance with the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA, 2022) through measures such as: – Minimising the length of trench open at a time. – Minimising the amount of time trenches and other excavations are open. – Scheduling trenching through watercourses during dry or low flow periods. – Constructing trench plugs (short section of trench left unexcavated to allow passage of stock or wildlife across the trench) with slopes less than 45o to provide exit ramps for fauna. Provide other exit ramps where practicable and safe to do so. Exit ramps to be installed at the ends of cable trenches. – Creating 'ladders' to enable fauna to exit the excavations (e.g. branches, ropes, planks, floats). – Daily inspections of open trenches by appropriately certified personnel to remove trapped fauna as required. – Inspection prior to and during dewatering activities by appropriately experienced and licenced personnel to remove trapped aquatic fauna as required. – Checking for fauna prior to backfilling trenches. • Ensure fauna are discouraged from work areas by erecting barriers where practicable. • Install signage along access routes through conservation reserves and patches of native vegetation to raise awareness of presence of wildlife crossing roads and reduce incidence of wildlife collision.	Development of a Construction Environmental Management Plan including the sub plan - Flora and Fauna Management Plan .	Prior to construction (prepare) Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Design construction fencing, trenching and other construction elements to allow Koalas to exit the construction area (should they enter it). • Develop and implement a procedure for finding trapped and/or injured fauna. • Design any fencing required to define construction boundaries or to protect No-Go Zones or Notional Root Zones (NRZ) in accordance with relevant DEECA guidelines to limit fauna strike and fauna mortality risk and/or maintain habitat connectivity. • Schedule construction works to avoid the breeding season of threatened fauna species in areas of habitat for those species, where practicable. • Time removal of vegetation (trees, shrubs, ground cover) to avoid the breeding season of nesting birds and mammals or times when arboreal mammals are less active and more likely to be inhabiting hollows (winter and spring) where practicable. • Design and manage lighting to avoid/minimise light spill into adjacent habitat in general accordance with guidance in the National Light Pollution Guidelines for Wildlife (DCCEEW, 2023) where these do not conflict with construction safety. At the shore crossing, lighting that is considered lower-impact to terrestrial mammals (and if possible, migratory shorebirds) is to be prioritised. • Minimise night-time works where practical to do so, to reduce impacts of noise and light on nocturnal animals. • Develop an artificial hollow program in consultation with the Department of Energy, Environment and Climate Action. The hollow program should document the actual losses, specify a suitable replacement ratio and artificial hollow types, record the number and location of artificial hollows and provide auditing the program. • Avoid impacts on Hooded Plover by engaging a suitably trained ecologist to check the beach for signs of nesting habitat for Hooded Plover and, if nests are found, designating no go areas and installing signage (OFF-M05). • Conduct pre-clearing survey at all sites where vegetation or aquatic habitat is being removed to assess presence of fauna. While this is particularly relevant for the removal of hollow-bearing trees due to potential occupancy			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	of hollows, it is also relevant for shrubs and ground layer habitat as this provides nesting and refuge opportunities for non-hollow dependent fauna. Where practicable, translocate any fauna detected during the survey, prior to the removal of any vegetation within the surveyed area. • Engage a suitably qualified wildlife handler ('wildlife spotter'), holding a relevant and current authorisation under the *Wildlife Act 1975*, to salvage any wildlife encountered during site clearance works. • Management protocols for any threatened fauna species detected during pre-construction surveys (in accordance with FFM-M001) or during construction, with specifies specific mitigations for, without limitation, Glossy Grass Skink and Swamp Skink if habitat for these species exists within the project area. • Management protocols to reduce disturbance risk (such as works buffer distances during nesting / breeding periods) to Orange- bellied Parrots, White-bellied Sea-eagle, and Little Eagle ~~during the construction phase of the project~~. • Identify zones to reduce speed limits in areas of extensive Koala habitat, such as in conservation reserves and access routes, where dense vegetation is adjacent to roads.			
FFM-M007	Prepare and implement a Biosecurity Management Plan (BMP) to define measures to manage and control impacts on indigenous fauna and flora values from biosecurity threats (weeds, pathogens, and pest animals) and set performance targets and contingency measures. The BMP will be developed in consultation with the Department of Energy, Environment and Climate Action and Wellington Shire Council and define measures to prevent the introduction and spread of weeds and pathogens including: • Use of fill that is preferably sourced locally to be compatible with the surrounding area or, if from offsite, needs to be determined as weed-free by a suitable service provider as per the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA 2017). • Inspection and certification of machinery and materials upon arrival at site in accordance with A Guide for Machinery Hygiene for Civil Construction (CCF 2011).	Development of a Construction Environmental Management Plan including the sub plan - Biosecurity Management Plan.	Prior to construction (prepare) Construction Operation Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	§ Biosecurity hygiene protocols to mitigate the spread of weeds, Cinnamon Fungus and Chytrid Fungus. • Risk assessment of the potential to spread/facilitate dispersal of pest plants/animals/pathogens during construction and operation • Pre-construction weed and pest mapping to determine locations of Catchment and Land Protection Act 1994 listed weeds and pests where weed and pest treatment is required within the project land. • Monitoring during construction to identify any new outbreaks of weeds. • Management of any outbreak weeds within construction areas that occurs due to construction activity in accordance with the Catchment and Land Protection Act 1994. • Measures to minimise the risk of spread of weeds into adjacent land. • Measures to ensure pest animals are not encouraged in the area through the provision of food (e.g. garbage on-site), harbour or new burrowing opportunities (e.g. for rabbits, foxes). • Measures to minimise the risk of spreading weeds and/or pathogens elsewhere in the region from machinery and vehicles leaving the project area. • Measures to minimise the risk posed by H5 avian influenza, including by implementing any applicable response measures specified by the Department of Agriculture, Fisheries and Forestry (Cth) or the Department of Energy, Environment and Climate Change (Vic) as at the time that construction is undertaken.			
FFM-M008	The CEMP (FFM-M003) must identify and define control measures to minimise impacts of erosion and acceleration of stream processes to protect bank stability, habitat and aquatic environments of waterways and drainage channels that could be directly or indirectly affected by construction activities. Erosion and sediment will be managed in accordance with current best practice environmental management and the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (AGPA, 2017) to prevent sediment-laden water from entering retained vegetation and habitat, drainage systems and waterways (see also, SOL-M010).	Development of a Construction Environmental Management Plan including the sub plan - Soil Erosion and Sediment Management Plan.	Prior to construction (prepare) During construction (implement)	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Prepare and implement measures and procedures to manage air quality such as management of stockpiles and materials which may become windborne (i.e. covering, spraying) in areas adjacent to retained vegetation and waterways (see also, AQM-M001). Prepare and implement measures and procedures to manage hazardous substances under the CEMP which define measures for storage and handling of hazardous substances in areas adjacent to retained vegetation and waterways (see also, SUM-M003).			
FFM-M009	Prepare and implement a protocol for works within Conservation Reserves in consultation with Parks Victoria and the Department of Energy, Environment and Climate Action. Measures contained within the protocol will be based on those defined in the Flora and Fauna Management Plan (FFM-M005) and Biosecurity Management Plan (FFM-M007) components of the Construction and Operational Environmental management Plans but with site-specific requirements, where required.	Development of Construction Environmental Management Plan.	Prior to construction (prepare) During construction (implement)	
FFM-M010	Prepare and implement a Designated Waterway Crossing Management Plan (DWCMP) in consultation with the Department of Energy, Environment and Climate Action and the West Gippsland Catchment Management Authority to describe how the project will manage and control impacts on designated waterways during construction. The DWCMP will define the construction method, timing and duration for construction works, and outline mitigations appropriate to the waterways such as diversion drains to maintain environmental water flows during construction. Designated Waterway Crossing Plan to be developed in alignment with the surface water elements of the project wide Construction Environmental Management Plan (FFM-M003), procedures to manage soil, erosion and sediment (FFM-M008), the Rehabilitation and Reinstatement Plan (FFM-M013), and measures to control the introduction and/or spread of weeds and/or pathogens (FFM-M007).	Development of a Construction Environmental Management Plan including the sub plan - Designated Waterway Crossing Management Plan.	Prior to construction (prepare) During construction (implement)	
FFM-M011	Prepare and implement an Operation Environmental Management Plan (OEMP) in consultation with the Department of Energy, Environment and Climate Action to define controls around the protection of retained biodiversity values including:	Development of Operation Environmental Management Plan.	Prior to operation (prepare) During operation (implement)	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• An Environmental Line List (ELL) which identifies ecological values that occur within the project area and prescribed management requirements associated within each identified value. The ELL will be reviewed on a regular basis. • Permitted maintenance activities (extent and type of activity) based on the ELL and defined based on the occurrence of native vegetation, threatened ecological communities and threatened species habitat. • Accurate maps identifying 'No Go Zones' and/or maintenance zones based on restrictions associated with ecological values. • Weed and pathogen control, in accordance with the same post-completion prevention and control procedures and methods outlined for the construction phase of the project. • Dust control using the same methods used during the construction phase for routine vehicle movements (cf. large construction machinery movements). • Waterway and wetland protection, including the use of stabilised waterway crossing points during dry conditions only, or the use of designated existing bridges to obtain access to the easement during wet conditions. • An audit framework will be included in the plan. • Corrective actions to be implemented if the outcomes of the OEMP are not achieved. The OEMP will be reviewed by the project annually and adaptive measures implemented (where required).			
FFM-M012	Prepare and implement a Decommissioning Environmental Management Plan (DEMP). The DEMP will be developed following an updated survey of biodiversity values present immediately prior to the decommissioning phase. An audit framework will be included in the plan. The DEMP will be developed in consultation with the Department of Energy, Environment and Climate Action and reviewed by the project annually.	Development of Decommissioning Environmental Plan.	Prior to decommissioning (prepare) During decommissioning (implement)	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
FFM-M013	Prepare and implement a Rehabilitation and Reinstatement Plan (RRP) to guide the approach to rehabilitation following the completion of construction in patches of native vegetation and threatened species habitat in conservation reserves and on waterways, private land and roadsides. The RRP will be developed in consultation with the Department of Energy, Environment and Climate Action, West Gippsland Catchment Management Authority, relevant landowners/land managers (including Wellington Shire Council), and with reference to the Australian Pipelines and Gas Association Code of Environmental Practice: Onshore Pipelines (APGA, 2017), and include measures such as: • Documenting the pre-construction condition of all waterways and drainage lines potentially affected by construction (including their immediate surrounds) to establish baseline conditions and inform development of measures to manage potential impacts • Details of the actions and responsibilities to progressively rehabilitate, regenerate, revegetate and/or re-instate areas, including beds and banks of waterways and drainage lines (noting the operational maintenance requirements). • Topsoil removal and storage to protect the seed bank resource. • Retention of proportion of trees felled in situ to provide additional habitat resources. Emphasis should be placed on retaining trees that contain hollows. • Returning habitat features removed during construction such as large hollow logs and rocks if consistent with rehabilitation objectives at particular locations. • Rehabilitation of Woodside H28 Bushland Reserve as soon as reasonably practicable (if required) • Identification of flora species and plant and/or seed stock sources that may include salvage and replanting of plants where appropriate and reasonably practicable. • Procedures, timeframes, measurable performance objectives, and responsibilities for monitoring the success of rehabilitation and/or	Development of a Construction Environmental Management Plan including the sub plan - Rehabilitation and Reinstatement Plan.	Prior to construction (prepare) Post construction (implement)	Accept, and recommend measure includes a requirement for locally indigenous plants known to be favoured food for the New Holland Mouse and Orange-bellied Parrot to be prioritised for planting in impacted habitat areas, as far as practicable and subject to landowner consents.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	reinstatement/stabilisation areas (including frequency of monitoring considering high risk weed life cycles). • Corrective actions to be implemented if the outcomes of rehabilitation and/or reinstatement/stabilisation do not achieve the objectives adopted. • In consultation with DEECA, develop appropriate compensation measures for direct loss of Pale Swamp Everlasting and Coast Grey-box.			
FFM-M014	Following detailed design and prior to construction, prepare a Dewatering Plan as a sub-plan to the Construction Environmental Management Plan (CEMP) to outline whether potential Groundwater Dependent Ecosystems (GDEs) may be affected and measures to monitor and manage impacts of dewatering associated with transition joint bays at shore crossing and joint bays and cable trench(es) along the onshore transmission line will be managed as follows: • Confirm potentially affected GDEs – confirm presence of existing native vegetation and waterways within the area that may be influenced by groundwater drawdown. • Drawdown assessment (terrestrial GDEs) – assess potential for adverse dewatering impacts on the native vegetation in that area based on potential for water table to be intersected and likely reliance on groundwater of the vegetation community. • Drawdown assessment (aquatic GDEs) in shore crossing area – assess potential impact to the unnamed waterway from transition bay dewatering, including undertaking additional groundwater and surface water level and water quality monitoring. • Drawdown assessment (aquatic GDEs) near joint bays – site-specific impact assessment in the event that a joint bay is located within 60 m of Morris Creek, Warrigal Creek, Hoddinott Creek, or Sunville Creek. • Manage construction – time dewatering to avoid driest periods • Make good arrangements – irrigation of GDEs where excavation intersects groundwater and dewatering if regular monitoring around those potential GDEs identifies this is required.	Development of a Construction Environmental Management Plan including the sub plan - Dewatering Plan.	Prior to construction (prepare) Construction (implement)	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
FFM-M015	Undertake targeted surveys for threatened and protected flora on public land to inform application for Flora and Fauna Guarantee Act permit to take. Engage with the Department of Environment, Energy and Climate Action on expectations on additional information required to be obtained prior to submission of application for a FFG Permit.	Engagement with DEECA; Application for FFG Act permit; Permit approved to take protected flora from public land.	Prior to construction	
Groundwater				
GWM-M001	Following detailed design and prior to construction, the potential for temporary water level drawdown at existing water supply well(s) due to dewatering will be managed as follows: 1 Confirm existing wells The location, construction details, and intended uses of wells on land adjacent to the easement will be confirmed through liaison with appropriate landowners. This will include wells that may be present in the study area but are not in the registered well database. 2 Drawdown assessment An assessment of the potential for adverse dewatering impacts on water supply wells will be completed based on the well's distance from dewatering activities with consideration to drawdown estimates contained herein, well construction and available drawdown (difference between standing water level and pump depth). 3 Make good arrangements If the potential for an impact is identified, then make good arrangements between the proponent and landholder/well owner will be agreed and implemented during temporary dewatering activities (if required).	Development of a drawdown assessment based on detailed design and records of make good arrangements (if required), as required in CEMP.	Construction	
GWM-M002	Following detailed design and prior to construction, the potential for existing wells to be lost or damaged will be managed as follows: 4 Confirm existing wells The location, construction details, and intended uses of wells within the construction corridor will be confirmed through liaison with appropriate landowners. 5 Make good arrangements In instances where a well is deemed to be impacted by the project, make	Development of make good arrangements (if required), as required in CEMP.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	good arrangements between the proponent and landholder/well owner will be agreed and implemented (subject to any approvals required).			
GWM-M003	An Acid Sulfate Soil Management Plan will be prepared and implemented for the project (refer to SOL-M005 and SUM-M006. For the purposes of groundwater impacts, the Acid Sulfate Soil Management Plan will be prepared and implemented in accordance with the National Acid Sulfate Soils Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments (Shand et al., 2018). The Acid Sulfate Soil Management Plan will include, but not be limited to, the following actions in areas confirmed to contain potential acid sulfate soil: • Staging of disturbance and dewatering to limit the groundwater cone of depression to less than 100 metres from the edge of excavations; • Installation of groundwater monitoring bores upgradient and downgradient of dewatering and monitoring of groundwater quality pre-dewatering (that is, baseline monitoring), during dewatering, and post-dewatering; • Monitoring of drawdown levels and dewatering discharge quality during construction dewatering; • Contingency measures that include immediate cessation of dewatering if the groundwater quality results indicate that environmental impact has occurred as a result of project works.	Development of an Acid Sulfate Soil Management Plan	Construction	
Surface water				
SUM-M001	Locate construction compounds, drilling compounds, batching plants, laydown areas and material storage areas outside of the 1% Annual Exceedance Probability (AEP) flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: • Site optimisation during the detailed design phase to minimise works in the floodplain. This will include locating soil stockpiles, equipment laydown areas and all non-essential plant and equipment outside of the floodplain. • The Construction Environmental Management Plan (CEMP) will include a surface water management plan (SWMP) that sets out the engineering	Inclusion of engineering controls and management strategies required to manage stormwater and flood risks in the CEMP (surface water management plan)	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	controls and management strategies required to manage stormwater and flood risks within the construction site and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020). The plan will include, but not be limited to the following: – Elevating temporary buildings and containerised equipment above the 1% AEP flood level wherever practical. – Minimising soil disturbance within the floodplain. – Bunding to reduce the risk of inundation from a 1% AEP flood event or storm tide. This will be designed to maintain conveyance of floodwater around the bunded area. – A staged response to potential flood and storm events.			
SUM-M002	Locate construction compounds, drilling compounds, batching plants, laydown areas and material storage areas outside of the 1% AEP flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: The Construction Environmental Management Plan (CEMP) will be developed in consultation with the relevant authorities. The CEMP will include a surface water management plan (SWMP) that sets out the engineering controls and management strategies required to maintain the exiting flow regime regime and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020): • Set backs of works and associated construction facilities from designated waterways and drainage pathways • Crossings of designated waterways and drainage pathways will be designed to meet the requirements of the West Gippsland Catchment Management Authority (WGCMA).	Inclusion of engineering controls and management strategies required to manage stormwater and flood risks in the CEMP (surface water management plan).	Construction	
SUM-M003	The CEMP through the surface water management plan will be implemented and include measures and procedures for the appropriate storage, handling and transportation of chemicals and fuels, including:	Inclusion of measures and procedures for the appropriate storage, handling and	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Store bulk fuel in self-bunded tanks in accordance with relevant Australian standards (AS1940-2017 and AS1692-2006). • Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 m or as far away as is reasonably practical from any waterway with appropriate measures to contain spills. • Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety Act 2004 (OHS Act) and Occupational Health and Safety Regulations 2007 (OHS Regulations). • Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods. • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur. Supply spill kits and firefighting equipment with the chemicals required by legislation. Maintain dangerous goods and hazardous materials register and current safety data sheets (SDSs). • Transformers to be filled only following installation of bunds to prevent discharge of oils during filling process.	transportation of chemicals and fuels in the CEMP (surface water management plan).		
SUM-M004	All trench crossing works will be carried out in accordance with relevant regulatory requirements and industry best practice guidelines including: • International Erosion Control Association (IECA) Best Practice Erosion and Sediment Control Appendix P; Land Based Pipeline Construction Guidelines (2015). • EPA Publication 1896: Working within or adjacent to waterways (2020). • The conditions of any WGCMA Works on Waterways Permit. • The WGCMA will be consulted for all waterway crossing works. • Trench crossing works will be programmed for dry or low flow conditions, where practicable.	Development of a trenched waterway crossing excavation staging strategy - part of CEMP and construction method statement.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• The trenched waterway crossing excavation staging strategy will include staging the program to minimise the length of time excavations remain open, to the extent practicable. • Alternative construction methodologies, such as trenchless crossings (e.g. HDD) will be considered for waterways with significant baseflows, deep or steep sided gullies, or where bank stabilisation and rehabilitation works are not feasible. • Refer also to Designated Waterway Crossing Management Plan (FFM-M010) for waterway crossing requirements.			
SUM-M005	The proposed drilling profile design and the work method statement shall be submitted to the WGCMA and approved prior to the commencement of trenchless waterway crossings. Risk of frac-out will be assessed in accordance with industry best practice guidelines to determine likelihood of occurrence (e.g. modelling). Drilling profiles will be adjusted where the risk of frac-out is considered likely. Drilling fluid properties will be monitored during trenchless crossing operations to reduce the risk of frac-outs (e.g. mud weight, viscosity, pressure). Drilling equipment and configuration will be appropriate for the proposed trenchless crossing operation to prevent frac-out. Pollution prevention strategies will be in accordance with EPA Publication 1834; Civil Construction, Building and Demolition Guide, IECA Best Practice Erosion and Sediment Control Appendix P; Land Based Pipeline Construction Guidelines and EPA Publication 1896: Working within or adjacent to waterways. Sediment control devices such as silt fences will be used to remove suspended solids and dissipate flow where required. Earth bunds/or and drainage channels will be placed around the upper edges of drill sites and work areas to divert natural runoff around and away from the site and prevent mixing with drilling compound runoff. Sump pits will be constructed at the bottom of the drill site. The sump pit will be positioned to capture runoff from the drilling compound. Materials collected in the sump pit will be assessed and managed in accordance with industry best practice guidelines for trenchless crossing operations. An earth bund or silt fence will be placed around the sump pit to contain any spillage.	Submission of proposed drilling profile design and work method statement to WGCMA.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	All facilities utilised in the surface mud handling (mixing, cleaning and pumping) during trenchless crossing activities will be bunded.			
SUM-M006	All works in areas identified as containing potential ASS, an ASS management plan will be developed (also refer to mitigation GWM-M003) and all mitigation works will be carried in out in accordance with the relevant industry legislation and guidelines, including: • Industrial Waste Management Policy (Waste Acid Sulfate Soils) 1999. • EPA Victoria - Publication IWRG655.1 Acid Sulfate Soil and Rock. • Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils (CASS BPMG 2010). • Construction works will be staged and programmed to minimise the duration and exposure of excavations in areas identified as containing ASS to the extent practicable.	Development of an Acid Sulfate Soil Management Plan.	Construction	
SUM-M007	All construction activities will be carried out in accordance with industry standard best practice guidelines including: • IECA Best Practice Erosion and Sediment Control Guidelines. • EPA Publication 1834; Civil Construction, Building and Demolition Guide. • EPA Victoria Publication 1806; Reducing Risk in the Premixed Concrete Industry. • A project wide Construction Environmental Management Plan (CEMP) will include a surface water management plan (SWMP) that sets out the engineering controls and management strategies required to manage runoff during construction. The CEMP will also include requirements for appropriate soil testing at each site to identify any potentially problematic soils (e.g. dispersive soils). Where identified, the CEMP will outline the necessary control measures to ensure problematic soils are managed to prevent runoff from impacting receiving waterways and wetlands.	Inclusion of erosion and sediment mitigation measures in the CEMP.	Construction	
SUM-M008	The CEMP through the surface water management plan will adopt a management hierarchy that prioritises the prevention of discharges into surface waters as far as is reasonably practicable. Any groundwater released to surface	Inclusion a management hierarchy that prioritises the prevention of discharges into surface	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	waters will meet the water quality objectives as defined in the Environmental Reference Standards 2021.	waters in the CEMP (surface water management plan).		
SUM-M009	Design of the onshore operational facilities will make allowances for the impacts of climate change on surface water, including risk of inundation.	Design basis document.	Operation	
SUM-M010	Locate all operational and permanent infrastructure, including joint bays, outside of the 1% AEP flood extent, floodplains and areas identified as land subject to inundation overlay or floodway overlay. Where relocation is not considered feasible the following measures will be adopted: • Permanent infrastructure will be designed to address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020) • Site optimisation during the detailed design phase to ensure all permanent infrastructure is set back from designated waterways and drainage pathways. • Design of waterway crossings of designated waterways and drainage pathways to meet the requirements of the WGCMA. • Diversion of minor drainage pathways around structures to the satisfaction of the WGCMA. • Reinstatement of trenches and excavations to ensure existing surface topography and grades are maintained. This includes monitoring of backfilled excavations and remedial corrective works as required.	Design basis document.	Operation	
SUM-M011	Decommissioning infrastructure including site compounds, laydown areas, wastes and materials storage areas will be located outside of the 1% AEP flood extent (2060), floodplains and areas identified as land subject to inundation overlay or floodway overlay to the extent practicable. Where relocation of works outside of the floodplain is not considered feasible, a Surface Water Management Plan will be developed to set out the engineering controls and management strategies required to manage flood risks within the decommissioning site and address the requirements outlined in the Guidelines for Development in Flood Prone Areas (West Gippsland Catchment Management Authority, 2020).	Surface Water Management Plan - part of Decommissioning Plan.	Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
SUM-M012	All decommissioning activities will be carried out in accordance with the relevant industry standard best practice guidelines at the time of decommissioning. At the minimum, these will include guidelines that relate to best practice: • Erosion and sediment controls • Environmental guidelines for major construction sites • Storage and handling of fuels, chemicals, and wastes • A site-specific Surface Water Management Plan will also be developed, setting out the engineering controls and management strategies required to manage stormwater runoff and water quality impacts.	Surface Water Management Plan - part of Decommissioning Plan.	Decommissioning	
SUM-M013	The management of ASS during the decommissioning phase will be carried out in accordance with the relevant legislation and best practice guidelines at the time of decommissioning. All decommissioning works will be staged and programmed to minimise the duration and exposure of excavations in areas identified as containing ASS to the extent practicable.	Decommissioning plan.	Decommissioning	
SUM-M014	The storage and handling of chemicals, fuels, oils and wastes will be carried out in accordance with the relevant industry standard best practice guidelines at the time of decommissioning.	Decommissioning plan.	Decommissioning	
Soil and waste				
SOL-M001	Dewatered groundwater from the onshore transmission construction will only be discharged to land in accordance with the Environment Protection (EP) Regulations (subject to agreement of landowners). Groundwater will be tested to confirm suitability for discharge with regard to pH and salinity (this may be completed using handheld monitoring equipment in the field). Groundwater must not be discharged to ground where it may flow into a surface water body unless in accordance with the EP Act and Regulations and with approval from the Authority.	Groundwater testing records and obtaining EPA approval (if required), as required by CEMP and Dewatering Plan.	Construction	
SOL-M002	In the event that unexpected or unknown contamination is encountered during construction works, the Construction Environment Management Plan (CEMP) will be implemented and will include the following measures to mitigate risks to human health and the environment:	Development of a Construction Environmental Management Plan including	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Ground disturbance activities will be suspended at the area of unexpected or unknown contamination and within the immediate vicinity • Assessment of the contamination will be undertaken by a suitably qualified specialist, and the appropriate action(s) determined Appropriate action(s) will be implemented.	management of unexpected contamination Stop works record and contamination assessment (if required).		
SOL-M003	A soil excavation staging strategy will be implemented for all soils from the onshore transmission construction. The soil excavation staging strategy will include: • Staging of disturbance such that the potential effects on any area disturbed at any one time can be effectively managed • Staging of excavations program to minimise the amount of time that identified Acid Sulfate Soil (ASS) is exposed to the atmosphere (including rainfall and seeping perched waters (if any). • Suggested stockpiling durations as per the Coastal Acid Sulfate Soil (CASS) Best Practice Management Plan (BPMG), where ASS is identified • Measures to be implemented if stockpiles are to remain for longer than the suggested durations, for instance: – chemical treatment (liming) – spreading a guard layer before stockpiling – covering the stockpile.	Development of a soil excavation strategy, likely reflected in Contractor's construction method statement.	Construction	
SOL-M004	Further Acid Sulfate Soil (ASS) assessment of soils, identified as Actual ASS or Potential ASS, in accordance with National Acid Sulfate Soils Guidance is required to characterise the extent of ASS and identify required management levels (such as liming). The assessment of ASS is required to feed into development of the Acid Sulfate Soil Management Plan (ASSMP) (SOL-M005).	Development and implementation of an Acid Sulfate Soils Management Plan.	Construction	
SOL-M005	An Acid Sulfate Soils Management Plan (ASSMP) will be developed and implemented for all Acid Sulfate Soil (ASS) from the onshore transmission construction (refer also to GWM-M003 and SUM-M006). The monitoring program must be in place prior to any construction commencing. The ASSMP will detail the requirements for management of ASS for the project including:	Development and implementation of an Acid Sulfate Soils Management Plan.	Prior to construction (prepare plan) Construction (implement)	Generally accept, but recommend the plan be independently verified by an Independent Environmental Auditor.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Construction works in areas of ASS will not occur during wet months unless unavoidable • Managing unexpected interception of ASS • Appropriate capture and management of runoff including details regarding potential requirements for containment within bunds and a leachate collection system (where necessary) • Appropriate trench dewatering that will limit Potential ASS activation in accordance with the Coastal Acid Sulfate Soil Best Practice Management Guideline (CASS BPMG) and the National Acid Sulfate Soils Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments • Appropriate offsite disposal if ASS cannot be managed onsite • Training to be provided to relevant site-based personnel on the requirements of the ASSMP • ASS management monitoring program to measure the effectiveness of the mitigation and management measures and to provide an early warning of any environmental degradation or impact to surface water, groundwater and soils. The ASSMP will be prepared in accordance with relevant guidelines and regulations, including: • Environment Protection (EP) Act • EP Regulations • Industrial Waste Management Policy (Waste Acid Sulfate Soils • EPA Victoria Publication 655: Acid Sulfate Soil and Rock • Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soil (CASS BPMG, 2010) • National Acid Sulfate Soil Guidance: Sampling and Identification Methods Manual • National acid Sulfate Soil Guidance: Identification and Laboratory Methods Manual		~~Construction~~	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• National acid Sulfate Soil Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments. • Australian Standards 4969 Analysis of Acid Sulfate Soil • The ASSMP will be reviewed and verified by an environmental auditor as complying with the relevant guidelines and legislation.			
SOL-M006	An experienced and qualified trenchless construction contractor (e.g. horizonal direction drilling (HDD) contractor) will be employed to undertake any trenchless works and will employ practices to prevent losses of drilling fluids such as: • Detailed design including frac out modelling to identify the lowest risk drilling path and methods to reduce risk of loss to the environment • Monitoring circulation of drilling fluid throughout the operation for indication of loss of drilling fluids • Specify suitable use of non-toxic and biodegradable drilling fluid • Recycling of drilling fluids where practicable • Loss circulation material to be available onsite to address porous formation if encountered. • Drill cuttings and residual drilling fluids will be collected and contained. Wet cuttings and excess fluid will be transported to an EPA Victoria licensed waste facility in accordance with EPA Victoria Publication 1828.3 and Environment Protection Regulations 2021 as required • The measures and procedures adopted for trenchless construction activities, to minimise loss of fluid, must be detailed in the Construction Environment Management Plan (CEMP).	Inclusion of measures and procedures adopted for trenchless construction activities in the CEMP.	Construction	
SOL-M007	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate storage, handling and transportation of chemicals and fuels in line with relevant EPA guidelines, such as Publication 1698 – Liquid Storage and Handling Guidelines, and Publication 1730 – Solid Storage and Handling Guidelines, including: • Store bulk fuel in self-bunded tanks in accordance with relevant Australian standards (AS1940-2017 and AS1692-2006)	Inclusion of measures and procedures adopted for the appropriate storage, handling and transportation of chemicals and fuels in the CEMP.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 m from any waterway with appropriate measures to contain spills • Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety (OHS) Act and OHS Regulations • Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur • Supply spill kits and firefighting equipment with the chemicals required by legislation • Maintain dangerous goods and hazardous materials register and current safety data sheets (SDS).			
SOL-M008	Develop and implement a plan for the disposal of large quantities of trench spoil, to be included in the Construction Environment Management Plan (CEMP), in consultation with Wellington Shire Council (as it relates to municipal waste disposal facilities). The disposal plan must include: • Identify offsite reuse options where appropriate and possible • Identify one or more locations able to accept the waste trench spoil where it will be managed to prevent impact to the surrounding environment at the time of placement and into the future • Identify disposal locations that may be beneficial to the community and/or environment (for instance, former quarry sites) • The potential risk associated with dispersive soil much be addressed where spoil is to be reused, including consideration of erosion and impact to adjacent agricultural land (based on guidance from the International Erosion Control Association - IECA, Best Practice Erosion and Sediment Control (2025)).	Inclusion of measures and procedures adopted for the disposal of large quantities of trench spoil in the CEMP (disposal plan).	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Any reuse or disposal must be in accordance with the Environment Protection (EP) Act, EP Regulations and EPA Victoria Publication 1828.3 Waste disposal categories – characteristics and thresholds.			
SOL-M009	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate handling, storage and disposal of waste streams, including: • Manage waste in accordance with Environment Protection (EP) Act, EP Regulations and other relevant EPA guidance documents, including Publication 1827.2 (Waste Classification Assessment Protocol), Publication 1828.3 (Waste Disposal Categories – Characteristics and Thresholds), IWRG702.2 (Soil Hazard Categorisation and Management), and PFAS NEMP 3.0, including establishment of appropriate and secured waste storage locations on-site, as required • Develop and implement waste management procedures • Waste will be managed in accordance with the waste management hierarchy, as outlined in the EP Act • Collect and transport wastes by licenced contractors for disposal at appropriately licenced facilities • Provide waste containers for different types of waste generated onsite • Refuse containers should be lidded or secured appropriately, for instance, putrescible waste should be lidded to mitigate fauna access, other waste should be lidded or secured appropriately if required to avoid dispersal.	Inclusion of measures and procedures adopted for appropriate handling, storage and disposal of waste streams in the CEMP.	Construction	
SOL-M010	The Construction Environment Management Plan (CEMP) will be implemented and include measures and procedures for the appropriate management of trench backfill in accordance with the Code of Environmental Practice Onshore Pipelines Revision 5. Trenches to be backfilled and compacted to a specific geotechnical design method based on the type of material being placed. Once spoil has been compacted the topsoil will be reinstated.	Inclusion of measures and procedures adopted for the appropriate management of trench backfill in the CEMP.	Construction	
SOL-M011	The Operational Environment Management Plan (OEMP) will be implemented and include measures and procedures for the appropriate handling and storage or fuels and chemicals, including:	Inclusion of measures and procedures adopted the appropriate handling and	Operation	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 50 metres or as far away as is reasonably practical from any waterway with appropriate measures to contain spills. • Store hazardous materials in ventilated, self-bunded and secured containers in accordance with the Occupational Health and Safety (OHS) Act and OHS Regulations. • Store dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods. • Undertake routine and scheduled maintenance of vehicles and plant/machinery/equipment to minimise the potential for leaks/spills to occur. • Maintain dangerous goods and hazardous materials register and current safety data sheets.	storage or fuels and chemicals in the OEMP.		
SOL-M012	The Operational Environment Management Plan (OEMP) will be implemented and include measures and procedures for the appropriate handling, storage and disposal of waste streams, including: • Minimisation via avoidance and recycling where practicable • Management and disposal of wastes in accordance with Environment Protection (EP) Act and EP Regulations, including disposal to licenced facilities where appropriate.	Inclusion of measures and procedures adopted for the appropriate handling, storage and disposal of waste streams in the OEMP.	Operation	
Aboriginal cultural heritage				
ACH-M001	Prepare, gain approval, and implement conditions of a CHMP in accordance with Aboriginal Heritage Act 2006 (Vic)	Approval of a project specific CHMP	Construction	
ACH-M002	Prepare a cultural values assessment in conjunction with Gunaikurnai Land and Waters Aboriginal Corporation to assess impacts to intangible, non-archaeological Aboriginal heritage places and/or values. Prepare a cultural values assessment in conjunction with Bunurong Land Council Aboriginal Corporation as relevant to the Project.	Preparation of ~~a~~ Cultural Values Assessments	Pre-Construction	Do not accept Inquiry's addition to require a Bunurong-led CVA, although this could be an outcome of the proponent's engagement activities as part of the Traditional Owner Engagement Plan.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
ACH-M003	The Reeves Beach onshore cable crossing will be designed and constructed in a way that minimises impact to any cultural heritage material upon, or within, the foreshore barrier dunes. Specifically, the buried cable will be installed via trenchless excavation techniques at a suitable depth (more than 10 m) to avoid any impact to Aboriginal cultural heritage material upon, or within the foreshore barrier dunes.	Use of directional drilling to construct the shore crossing infrastructure (more than 15m depth)	Construction	
ACH-M005	The adopted project design with relation to buried cable installation will mitigate the probability that native vegetation will be affected by buried cable radiant heat during the operational phase of the project.	Inspection required in the CEMP and OEMP	Operation	
ACH-M006	A Traditional Owner Engagement Plan will be prepared in consultation with Traditional Owners, including native title holders and other Aboriginal and Torres Strait Islander people and organisations with an interest in the project. The Traditional Owner Engagement Plan will provide a framework for ongoing engagement, communication, consideration of feedback and resolution of issues throughout the life of the project.	Development of a Traditional Owner Engagement Plan	Pre-construction Construction Operation Decommissioning	
SCH-M001	Detailed geotechnical and geophysical survey campaigns undertaken prior to construction will be informed and guided by a suitably experienced and qualified underwater archaeologist. The planned geophysical survey campaign will provide full coverage of all the final infrastructure locations, with broader project-area survey carried out at line spacing appropriate for archaeological purposes (including multibeam echosounder, side scan sonar, sub bottom profiler, and magnetometer). The geotechnical survey (cone penetration testing (CPT), vibro-coring (VC)) will sample targeted locations throughout the offshore project area where project infrastructure is intended to be installed and will include the provision of samples for geoarchaeological assessment. The datasets obtained from this survey campaign will be utilised to update the Submerged Palaeolandscape Assessment prior to construction, including: • Greater density of survey lines to identify features and inform subsequent geotechnical surveys • Assessment of geotechnical samples by specialist geoarchaeologist.	Geophysical and Geotechnical Survey report.	Pre-Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	The updated Submerged Palaeolandscape Assessment and the results of this survey campaign will in turn inform project design, mitigation, and the preparation of both the Cultural Heritage Management Plan (pertaining to State Waters, see SCH-M003; SCH-M007) and UCH Management Plan for Commonwealth Waters. Consultation will be undertaken with Gunaikurnai Land and Waters Aboriginal Corporation, the Commonwealth Department of Climate Change, Energy, the Environment and Water, Heritage Victoria, and First Peoples–State Relations on the findings and implications of the updated Submerged Palaeolandscape Assessment.			
SCH-M002	Undertake a geoarchaeological assessment of geotechnical logs and samples as appropriate for a defined and agreed mitigation campaign to clarify the geoarchaeological and palaeoenvironmental potential of geotechnical sequences recovered from the study area. This will involve identifying and describing samples of geoarchaeological potential by a suitably qualified marine geoarchaeologist, in order to clarify the nature of the sediments, and their mode of deposition. This assessment will be undertaken prior to construction and include the following: • Description of sediment sequences assigned medium and high priority status during the initial review of logs obtained for geotechnical (engineering) purposes. • Modelling the character, extent and depth of deposits; • Interpreting the probable environments represented; • Determining the importance of the deposits, with regard to their archaeological and palaeoenvironmental potential, and; • Recommendations for dating and palaeoenvironmental assessment as appropriate, in order to understand the preservation and changing nature of the human landscapes of the study area, to address specific questions reflecting the scientific and cultural value of the evidence preserved in the stratigraphic sequences.	Geoarchaeological assessment report.	Pre-Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	The geoarchaeological assessment will inform the update to the Submerged Palaeolandscape Assessment (also see SCH-M001) and inform the preparation of both the Cultural Heritage Management Plan (SCH-M003; SCH-M007) and Underwater Cultural Heritage Management Plan for Commonwealth Waters.			
SCH-M003	Prepare, gain approval, and implement conditions of a Cultural Heritage Management Plan (CHMP) in accordance with the Aboriginal Heritage Act 2006 (Vic). The CHMP will include specific conditions to avoid, mitigate, or manage impact to submerged Aboriginal cultural heritage located within State Waters (also see ACH-M01; ACH-M07).	Development of Cultural Heritage Management Plan.	Prepared and Approved Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning	
SCH-M005	For project personnel whose activities may impact submerged palaeolandscapes receptors, Submerged Aboriginal Cultural Heritage inductions will ensure that personnel are aware of their obligations to report and protect Aboriginal cultural heritage under Commonwealth and State legislation including: • Aboriginal Cultural Heritage Act 2006 (Vic) • Underwater Cultural Heritage Act 2018 (Cth). The details of the Submerged Aboriginal Cultural Heritage induction requirements will be included as part of the Cultural Heritage Management Plan (SCH-M003) and Underwater Cultural Heritage Management Plan (SCH-M004). Also refer to UMH-M005 for non-Aboriginal underwater cultural heritage inductions.	Development of Underwater Cultural Heritage management plan.	Prepared and Agreed Pre-Construction. Deployed as needed during Pre-Construction, Construction, Operation, Decommissioning	
Historical heritage				
HHM-M001	Historical heritage Implement pre-start guidance/education for project staff in relation the protection of historical heritage places, including unexpected finds protocols prior to commencement on site. Historical archaeological heritage Implement historical archaeological heritage site induction to educate workforce	Site induction records as part of CEMP.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	operating around archaeological places, including unexpected finds protocols prior to commencement on site. The historical archaeological heritage induction must include: • The definition of an archaeological site • Describe traditional historical agricultural region sites • Demonstrate the existence and location of the Victorian Heritage Inventory sites throughout the project area • State that Consent from Heritage Victoria is required before disturbing a Victorian Heritage Inventory site • State the penalties associated with disturbing a site without Consent • State that the Heritage Act 2017 provides blanket protection for archaeological sites including those that are unknown and not included in the Victorian Heritage Inventory • Present the unexpected heritage finds protocol • Provide images and examples of historical agricultural sites and artefacts including: – Late nineteenth/early twentieth century homestead remains, cesspits and cisterns, and bottle/refuse dumps – Nineteenth and early twentieth century glass bottles and ceramics, handmade bricks, primitive concrete, historical/forged nails, and small finds like nineteenth and early twentieth century coins, buttons, toothbrushes, combs, slate pens, and clay pipes.			
HHM-M002	Install physical protection measures (hoarding/signage), where works are adjacent to potential historical heritage places prior to commencement of works.	Installation of protection measures as part of CEMP.	Construction	
HHM-M003	Establish unexpected finds protocol prior to commencement of works. This will include: Historical heritage • Cessation of works at subject location until assessment is undertaken • Notification of project heritage advisor (historical heritage) • Heritage advisor to review site (site visit, historic research etc. as required) and determine whether the site is of a level that relevant stakeholders (i.e.	Development of an unexpected finds protocol.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Council/Heritage Victoria) need to be informed. Historical archaeological heritage Establish unexpected finds protocol (archaeological) prior to commencement of works. If during the course of works an unexpected archaeological find is identified the following measures will be implemented: • Stop work in the vicinity of the find • Barricade or otherwise close off a 5m exclusion zone around the find • Notify the Project Heritage Advisor (archaeologist) of the find • Project works may proceed outside the exclusion zone • The Heritage Advisor to review site (site inspection, research, consult with Heritage Victoria, as required) and determine whether a site card and/or further investigations are required. Management measures to be determined in association with heritage advisor and relevant stakeholders.			
HHM-M004	'Historical Heritage No Go Zones' must be established around the extent of any Victorian Heritage Inventory site within the project area or within 10m of the project area prior to commencement of works. • The 'Historical Heritage No Go Zone' must physically delineate the extent of the Victorian Heritage Inventory site (using flagging, temporary fencing etc) and include signage indicating that works cannot occur in that location without prior Consent from Heritage Victoria and the penalties associated with contravening this. • There area has one Victorian Heritage Inventory site adjacent to the study area, Former Residence, Woodside Beach Road (H8220-0025). • When a Victorian Heritage Inventory site is outside the project area, the 'Historical Heritage No Go Zone' must delineate the interface between the project area and the extent of the Victorian Heritage Inventory site, but does not have to encompass the full Victorian Heritage Inventory site extent. The delineation may be erected either at the edge of the project area (outside	Establishment of No Go Zones as part of CEMP.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	which works must not extend) or the edge of the extent of the Victorian Heritage Inventory site, as appropriate. • Works within the 'Historical Heritage No Go Zone' may only be conducted under a Consent issued by Heritage Victoria and under the supervision of an archaeologist (unless otherwise advised by the archaeologist).			
UMH-M001	Pre-construction, targeted non-destructive investigation will occur within sections of the Offshore Wind Farm Area (OWFA) and Offshore Cable Export Area (OECA). These investigations will inform refinement of the wind turbine generator array, inter-array cables, interlink cables and export cable route to avoid/minimise impacts to archaeological sites. The methodology for the targeted non-destructive investigation surveys will be developed in consultation with Heritage Victoria and the project maritime archaeologist and the methods may include, but not be limited to high-resolution geophysical surveys and remote operated vehicle (ROV) inspections. Adaptive Management: Should anomalies of potential underwater cultural heritage be detected by qualified maritime archaeologist, investigation of anomalies of high and medium diagnostic priority as potential archaeological items (such as the wreck of the schooner Sarah - VHR # S607) within or close to the placement infrastructure or where seabed disturbance will occur to confirm their locations and determine status.	Survey results for detailed design geophysical campaign and as-built records from pre-construction clearance survey.	Pre-construction	
UMH-M002	Following the targeted pre-construction non-destructive investigations (UMH-M001), exclusion zones (with permitted activities) within the Offshore Project Area may be established prior to construction works occurring (seabed disturbance) for confirmed underwater cultural heritage (UCH) items that may be impacted by the positioning of project infrastructure, such as cable trenching or foundation installation. An Exclusion zone is a defined area where activities that can impact a heritage site are prohibited. Prohibited activities within these zones could include, but not be limited to, the establishment of no anchoring zones; or if the site is shallow, vessel movement over a certain size will not be allowed due to risk of propellor jet turbulence. The size of exclusion zones will be confirmed in consultation with	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Heritage Victoria and the project maritime archaeologist. Micro-siting around the defined exclusion zones will occur prior to construction. Exclusion zone sizes and locations will be documented in the project construction, operation and decommissioning environmental management plans. Exclusion zones will be maintained, resized, relocated, or removed in consultation with Heritage Victoria.			
UMH-M003	An Underwater Cultural Heritage (UHC) Management Plan for assessment, monitoring and reporting protocols will be established and approved prior to construction to mitigate potential risks of negative impacts to items of UCH. The UCH management plan will also include permit requirements and procedures for any site-specific archaeological investigations and actions that maybe required for identified items of UCH. This plan should be developed by a qualified maritime archaeologist in consultation with Heritage Victoria and in accordance with relevant Commonwealth and State Guidelines. An Unexpected Finds Protocol (UFP) will be included as part of the UCH Management Plan. The UFP is to guide Project personnel on appropriate assessment and reporting measures in case any unknown, unrecorded and/or newly discovered UCH items are found during construction, operation and decommissioning of the project. The UCH item will need to be reported according to the notification protocols detailed in the UCH Management Plan.	Development of Underwater Cultural Heritage management plan	Pre-construction	
UMH-M004	Adaptive management: Should it be deemed not reasonably practicable to avoid impacts to a confirmed underwater cultural heritage (UCH) item, a program of site-specific archaeological investigation aligned with the principles of the 2001 UNESCO Convention should be undertaken. These investigations may include, but not be limited to, site recording, sampling, relocation or excavation. The methodology and research design to be approved by the appropriate authority as outlined in the UCHMP. Subject to the outcomes of such a program, further measures may be required to be implemented in consultation with and approved by Heritage Victoria.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
UMH-M005	For project personnel whose activities may impact underwater cultural heritage, the project environmental induction will include an underwater cultural heritage induction. This induction is to make these personnel aware of their obligations to protect underwater cultural heritage under Commonwealth and State legislation relevant to UCH, including: -*Victorian Heritage Act 2017* -*Commonwealth Underwater Cultural Heritage Act 2018* The details of the underwater cultural heritage induction requirements will be included as part of the Underwater Cultural Heritage Management Plan.	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission	
UMH-M006	As part of the UCH Management Plan, site monitoring will be required for works taking place in the near vicinity of confirmed underwater cultural heritage (UCH) sites. The purpose of site monitoring is to prevent or minimise impacts to significant UCH items and monitor any changes to the site to determine if these are attributable to project activities. Site monitoring is to be undertaken by the project maritime archaeologist to minimise impacts. Adaptive Management: If confirmed UCH items are unavoidable (cannot be micro-sited around) then monitoring and adaptive management should be undertaken in consultation with the project maritime archaeologist. If confirmed significant or high potential significant UCH sites are identified, monitoring briefs will be required for works taking place in the near vicinity of items as part of the implementation of the UCH Management Plan. Monitoring is to be undertaken by the project maritime archaeologist to reduce impacts. The monitoring program would assess impacts on locations where site specific archaeological survey investigations have identified seabed features as being items of underwater cultural heritage (UCH) that are protected, or are likely to be protected, under the Commonwealth or State heritage legislation. Site monitoring could include, but not be limited to: 1. A baseline survey immediately prior to construction phase (methods could include side scan sonar, multi beam side scan, underwater remotely operated	Development of Underwater Cultural Heritage management plan	Construction, operation, decommission	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	vehicle (ROV) or if appropriate direct diver inspection). 2. Periodic inspections during construction if risk of impact is considered significant. 3. Post construction inspection as soon as construction completed. 4. Depending on the site and the nature of the potential impacts, periodic inspections could continue for one or more years after completion. 5. Inspections for any breaches of Exclusion zones. The planning, methodology and analysis of the results of the monitoring should be conducted in consultation with Heritage Victoria and a qualified maritime archaeologist.			
Business and tourism				
BTM-M001	A Communications and Stakeholder Engagement Plan will be developed in consultation with Wellington Shire Council and implemented prior to construction in accordance with TTP-M001 and SOC-M003. In relation to potential changes to local business and tourism during the construction phase, the plan will include communications, enquiries and complaints management procedures that allow feedback from Councils and the local community. Relevant business and community organisations will be included in stakeholder engagement activities.	Development of a Communications and Stakeholder Engagement Plan	Construction and operation	
BTM-M002	The Traffic Management Plan required in TTP-M002 will include assessment and management of construction impacts and will be developed in consultation with relevant road authorities. In relation to business and tourism, the plan will include the programming of construction works to avoid major traffic changes during key holidays in the region, where possible.	Development of a Traffic Management Plan.	Construction	
BTM-M003	Develop and implement a community benefit fund, in consultation with the community and Councils. The governance structure for the Fund, including arrangements for administration and approval of funding, must be co-designed with relevant Councils and beneficiary communities.	Community benefit fund established and initiatives agreed and funded.	Construction and operation	
BTM-M004	Consultation with Parks Victoria will be undertaken to identify and support management options of the Reeves Beach campground during construction of the project. Appropriate resources will be provided. Notification will be provided	Correspondence with Parks Victoria and pre-construction notifications	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	sufficiently in advance of affected periods and updated if timing or impacts change.			
BTM-M005	Develop and implement a Workforce Development Strategy, in consultation with Councils and other stakeholders, that will identify project labour needs and how to maximise participation by Gippsland firms and Gippsland workers. The Workforce Development Strategy must include specific measures to identify workforce participation and procurement opportunities for the communities located closest to or affected by the project, and to minimise competition for local workers in areas or occupations experiencing labour shortages. The Workforce Development Strategy must consider workforce demand from other major projects and identify measures to minimise and impacts on local businesses if required.	Development of a Workforce Development Strategy	Construction and operation	Generally accept, but rather than requiring the strategy minimises competition for local workers, I recommend a specific measure to work with Councils and other stakeholders (such as business groups or local business directly) to balance the benefits from usage of local workers with the impacts to areas or occupations experiencing labour shortages.
BTM-M006	Develop, update and implement the draft Workforce Accommodation Strategy prior to construction, in consultation with the relevant Councils and accommodation providers to minimise impacts of the project workforce on available accommodation providers within the local area (in accordance with SOC-M001). The Strategy must include: • monitoring, review and reporting requirements • appropriate thresholds or triggers for actions • contingency measures to respond to situations where impacts are greater than planned (including cumulative workforce accommodation demand from other major projects if required) In finalising and implementing the Strategy, the following actions will be undertaken: • Regular review and amendment of the Strategy, as required • Making available sufficient resources to actively plan, manage and monitor the Strategy. • Report on the broad Strategy outcomes to a Community Advisory Group or relevant Councils.	Update and finalise the Workforce Accommodation Strategy.	Construction and operation	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	If required, once the scale of the project and likely workforce is known with more certainty, collaborate with local authorities and other stakeholders to plan the provision of supplementary accommodation			
Social				
SOC-M001	Develop, update and implement the draft Workforce Accommodation Strategy prior to construction, in consultation with the relevant Councils and accommodation providers to minimise the impacts of the project's workforce during construction and operation on available accommodation within the local area.	Update and finalise the Workforce Accommodation Strategy.	Construction, Operation	
SOC-M002	Clarify final workforce numbers prior to construction, and as necessary and appropriate, provide primary medical services at Gippsland Ports which may be used by construction workers, to reduce or avoid the need for workers to make use of GP services in the local area.	Record of number of workforce confirmed prior to construction	Construction	
SOC-M003	A Communications and Stakeholder Engagement Plan will be developed in consultation with Wellington Shire Council and implemented during construction, and will include ~~including~~ the following in relation to social impact matters: • Information about construction sequencing to stakeholder such as fishing participants and users of the Reeves Beach Campground. • Provision of access to digital data on the location of wind turbines and OSS platforms, suitable for use by the fishing community. • Ensure Reeves Beach Campground users are informed regarding potential noise associated with construction~~,~~ (planned closures to the campground, etc. Notification will be provided sufficiently in advance of affected periods and updated if timing or impacts change.	Development of a Communications and Stakeholder Engagement Plan.	Construction	
Agriculture and forestry				
AGM-M001	Farmers and plantation operators will be compensated for economic losses that are a direct result of project activities during construction and operation. Fair and equitable payments will be made during the construction period and at handover as agreed with landholders. The process will include: • Definition of the specific losses,	Individual negotiated landholder agreements.	Construction and operation	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Calculation and quantification of the value of the loss and • A process to seek independent expert advice to resolve disputes regarding the losses or calculation of value.			
AGM-M002	A Property Management Plan (PMP) will be developed as part of the construction license via consultation with each farm/forestry owner/manager for all directly affected properties. The Property Management Plan and construction license will include a process for landholder interactions (in relation to farm operations), documentation of the baseline conditions on the affected properties, a process to identify times when the project needs to make best endeavours to minimise works (such as during harvesting, lambing, calving), a dispute resolution processes, communication protocols, measures to meet farm access requirements (for movement of people, equipment and livestock), measures to manage disruptions of farm livestock and water supply, biosecurity requirements, and any other site-specific requirements to maintain the ongoing operation of the property. A suitably qualified agricultural specialist independent from the project will review and verify the implementation of the Property Management Plans.	Property Management Plan – PMP.	Construction and operation	
AGM-M003	Management of soils during construction (trenching/stockpiling/reinstatement) will be undertaken in accordance with best practice guidance including EPA Publication 1828, 1834 and 1894. This practice will include following guidance from Earth Resources Victoria, regarding appropriate compaction management, profiling and erosion control during reinstatement.	CEMP to include descriptions as to how topsoil and subsoil stockpiles are stabilised, reinstated areas demonstrate stable soil profiles, with topsoil replaced to original depth.	Construction	
AGM-M004	Prior to release of the construction licence area to the landholder, pasture rehabilitation will be undertaken such that it is returned to a condition as near as practicable to the condition that existed immediately prior to the occupation of the project or as otherwise agreed to. This condition will be set by the baseline condition included in the Property Management Plan. There will also be a process to seek independent expert advice to resolve disputes regarding the rehabilitation. The rehabilitation process, species mix, soil improvements, timing	Inclusion of baseline conditions in PMPs, documentation to demonstrate this level has been reestablished prior to release of construction licence.	Construction and Operation	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	of pasture re-establishment, and weed control measures will be defined and documented in each landholder's Property Management Plan.			
AGM-M005	Comprehensive agriculture and forestry specific biosecurity procedures will be developed to industry standards, in consultation with agricultural specialists, landholders and Agriculture Victoria and include requirements for monitoring, auditing and enforcement. These procedures will form part of the overarching Construction Environmental Management Plan with property specific requirements covered under individual Property Management Plans. These requirements will apply to all company and contractor personnel, vehicles and equipment entering the site during project construction and operation. These biosecurity requirements will be incorporated into the Operation Environmental Management Plan for the project. There must be strict adherence to these biosecurity protocols. The procedures will be developed in alignment with measures to prevent the introduction and spread of weeds and pathogens in the Biosecurity Management Plan (FFM-M007).	Inclusion of specific biosecurity procedures in the CEMP and PMPs.	Construction and operation	
AGM-M007	Contingency plans will be developed and incorporated into the project's Construction Environmental Management Plan for inclement weather conditions, which will include specific consideration of the implications of these events on agriculture and forestry operations. Heavy vehicle movements when soils are saturated, particularly those occurring off the haul roads, will be minimised as far as reasonably practicable.	Inclusion of contingency plans for inclement weather conditions in the CEMP.	Construction	
AGM-M008	As part of operational activities, monitor surface covers and markers for damage and erosion. Where damage and erosion to project infrastructure is recorded, apply rectification measures.	Records of asset inspections, application of rectification measures (f required).	Operation	
Land use and planning				
LUP-M001	The construction of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following	Development of; an EMF and associated EMPs (including the CEMP and relevant sub-plans), a	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	frameworks and management plans to mitigate project impacts. Environmental management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Construction Environmental Management Plan which would include construction noise and vibration controls, air quality controls, and a traffic management plan. Workforce accommodation mitigations: • Preparation of a Workforce Accommodation Strategy and Workforce Accommodation Mitigations Framework should be updated in accordance with mitigation measure BTM-M006 and SOC-M001.	Workforce Accommodation Strategy (including relevant Workforce Accommodation Mitigations Framework), and Property Management Plans.		
LUP-M002	The operation of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following frameworks and management plans to mitigate project impacts. Environmental Management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Operation Environmental Management Plan which would include construction noise and vibration controls, air quality controls, and a traffic management plan.	Development of an EMF and associated EMPs (including the OEMP and relevant sub-plans), and a OEMP Communications and Sstakeholder eEngagement pPlan.	Operation	
LUP-M003	The decommissioning of the onshore transmission system including the shore crossing would be undertaken in accordance with the Star of the South Wind Farm Project Incorporated Document which allows for the use and development of the project land for the purposes of the project which includes the following frameworks and management plans to mitigate project impacts. Environmental Management Framework mitigations: • Preparation of an Environmental Management Framework and associated Environmental Management Plans, including implementation of the Decommissioning Environmental Management Plan which would include	Development of an EMF and associated EMPs (including the DEMP and relevant sub-plans), and a DEMP Communications and Sstakeholder eEngagement pPlan.	Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	construction noise and vibration controls, air quality controls, and a traffic management plan.			
UWN-M16	During days of high fire danger, construction will be undertaken in accordance with the measures in Electricity Transmission Lines – Bushfire Management and Community Safety (page 10) (Victorian Government, 2023). Notification of works on public land will be provided to Parks Victoria and DEECA at least two months prior to commencement of works, including whether any potential road closures/impacts to the road network (refer also to TTP-M001).	Development of a CEMP	Construction	
Electromagnetic field exposure				
EME-M001	The following design elements will be incorporated into the cable design to ensure electromagnetic impacts are minimised where reasonably practical: • Maximise operation easement separation to habitable premises, where reasonably practical. • Minimise spacing of three phase conductors within each cable circuit, • Optimise phasing from a magnetic field cancellation perspective for all cable circuits within the trenched easement, • Position joint bays away from one another and from habitable premises, where reasonably practical, and • Position joint bays to obtain balanced cable lengths between earth pits, where reasonably practical. • A detailed study at the detailed design stage should be carried out if any major parameters change (e.g., circuit current, voltage, cable layout configuration, burial depth, or route alignment), to confirm compliance with the nominated reference levels.	Detailed design reports	Construction (detailed design)	
Onshore noise and vibration				
ONV-M001	• Construction noise will be managed in accordance with EPA Victoria Publication 1834.2. This includes the development of a Construction Noise and Vibration Management Plan (CNVMP) to ensure, across all stages of the project, the relevant considerations and assessments will be made to ensure that noise (including from construction traffic) and vibration impacts will be	Development of Construction Noise and Vibration Management Plan,- Part of Construction	Construction	Generally accept, but for consistency with ONV-M002 and ONV-M005, I recommend reference to the independent specialist be replaced with

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	minimised as far as reasonably practicable, consistent with the General Environment Duty (in accordance with Section 6(1) of the EP Act). • These measures are to be implemented pro-actively, wherever it is reasonably practicable to do so, and are not to be contingent on predicted exceedances of nominated criteria. • Prior to commencement of project works, develop a CNVMP that complies with the Environment Protection Act 2017 and subordinate legislation, including the general environmental duty, and with reference to the Civil construction, building and demolition guide (EPA Publication 1834.2, as amended from time to time) and Construction – guide to preventing harm to people and the environment (EPA Publication 1820.1, as amended from time to time). The CNVMP must be informed by noise and vibration modelling of Project works. The CNVMP must include: • Identification of noise and vibration sensitive receivers, including consideration of sensitive receivers that may be more sensitive during Normal Working Hours such as shift workers or agricultural operations or community events that are more sensitive at specific time of year. • Unattended noise monitoring, will be undertaken no more than six months prior to construction commencing, at the nearest noise sensitive area for a period of not less than seven days. Noise monitoring will be undertaken by a qualified acoustic consultant • Details of the measured period background levels, including a description of the variability of the background level across the noise survey in sufficient detail to inform criteria and scheduling of out of hours works as required by EPA Publication 1834.2. • Construction noise and vibration reference levels and criteria derived using the background at the time of impact. Any applicable criteria based on average levels shall be set to represent the background at the time of impact using the lowest period average taken during the survey. Note that full period averaging may overestimate the background at the time of impact. The measurement data shall be analysed in accordance with the	Environmental Management Plan (CEMP).		environmental auditor, and the measure to specify the auditor is to be independent from the project.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	recommendations of the Civil construction, building and demolition guide (EPA Publication 1834.2). In other words, if the survey collected data over several days (i.e. several day (LA90, 11hr), evening (integrating period depends on the day) and night (LA90, 9hr) period averages), then select the lowest period average for the purposes of setting the criteria • Details of relevant construction activities and an indicative schedule for construction works, including identification of the activities that have the potential to generate noise and/or vibration impacts at sensitive receivers. • A noise and vibration risk assessment for the operation of laydown areas • Batching locations are to be assessed against EPA Publication 1826.5, as amended from time to time. • How the risks of construction noise and vibration will be minimised as far as is reasonably practicable at all times. • Consideration of low frequency noise • Consideration of the Environment Reference Standard • A program for monitoring and inspections to: – Validate construction noise and vibration predictions. – Assess the effectiveness of management measures – Assess whether noise and vibration levels are being minimised so far as reasonably practicable – Verify the noise predictions for Unavoidable Works and Managed-Impact Works. – The general traffic management measures taken from Section 4.3.1 of EPA Victoria Publication 1834.2 – Offsite mitigation will be considered, where appropriate, in accordance with Section 4.3.5 of EPA Victoria Publication 1834.2 – The general communication steps taken from Section 4.3.2 of EPA Victoria Publication 1834.2 – The general good practice techniques taken from Section 4.3.3 of EPA Victoria Publication 1834.2.			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Processes for reviewing and updating the modelling, plan and implemented controls in response to Project changes, changes to conditions, monitoring results or enquiries/complaints. • A process for unavoidable works, including – Identification of unavoidable works that would be undertaken, including their location, timing and duration – A clear rationale for defining works as being unavoidable works, including a justification as to why it is not reasonably practicable to undertake them during normal working hours. The justification will be reviewed and verified by a suitably qualified specialist independent from the project. – Response strategies to mitigate the impacts of unavoidable works, consistent with EPA Publication 1834.2 (as amended from time to time). • A process for consideration of avoidable Low Impact and Managed Impact works outside of normal working hours: - These should be avoided unless a clear justification is provided as to why it is not reasonably practicable to undertake them during normal working hours. A typical justification could be safety or environment related but must not be due to the schedule or the budget. The justification will be reviewed and verified by a suitably qualified specialist independent from the project. - Where these works are justified, the activities must adhere to the definitions of "Low Impact" or "Managed Impact" works consistent with EPA Publication 1834.2 (as amended from time to time). – Unless a construction delivery is justified to be unavoidable (per the definition provided in EPA 1834.2), deliveries shall not be scheduled to arrive on site outside of EPA 1834.2 normal working hours. – If a delivery is delayed for any reason (for example traffic, breakdown or accident) such that it arrives at site outside of normal working hours then this shall be noted in a log, along with the reason for the delay. The log shall be reviewed at regular intervals to establish whether or not the			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	current scheduling process is adequate to avoid deliveries arriving out of hours. • The CNVMP must be a sub plan to the CEMP and implemented during construction. • Specific consultation will be carried out with: • Parks Victoria and relevant user groups for Reeves Beach Campground and Natural Areas in the vicinity of the project. • Noise sensitive receptors within 1500 metres of the static cable system work sites (batching locations). • Noise sensitive receptors within 500 metres of a new or existing access track. • Noise sensitive receptors on the coast that could potentially be impacted by the offshore piling sections that are anticipated to generate higher levels of noise, such as sections containing adverse seabed geology. • All employees, contractors and subcontractors are to receive an environmental induction. The induction will include: • All relevant project specific and standard noise mitigation measures. • Relevant licence and approval conditions. • Permissible hours of work. • Any limitations on noise generating activities with special audible characteristics. • Location of nearest sensitive receptors. • Construction employee parking areas. • Designated loading/unloading areas and procedures. • Site opening/closing times (including deliveries). • Environmental incident procedures.			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
ONV-M002	Where it can be demonstrated that it is not reasonably practicable to carry out the works during normal hours, construction works undertaken outside of EPA Victoria normal working hours, will implement all reasonably practicable mitigation measures to minimise the impact on nearby receptors, including the following: - Adopting engineering noise controls at the source (e.g. silencer, mufflers, enclosures) by the best reasonably practicable means - Installing on site barriers such as hoardings or temporary enclosures to provide a noise barrier between any particularly noisy construction works and the residences - Limiting works in proximity to receptors to the arrival of staff on site and toolbox meetings between 6 am and 7 am. The use of loud equipment, generation of unnecessary noise and the movement of vehicles on the construction footprint will be minimised, where reasonably practicable. - Provide respite offers that reflect the level of impact, and which are consistent with the projects community engagement commitments, for example, provision of movie tickets. It is noted that works undertaken outside of normal working hours are required to be justified and be managed on the basis of being "low impact", "managed impact" or "unavoidable works" (as defined in EPA Publication 1834.2). Unavoidable works will be identified and managed as either planned or unplanned activities. Avoidable works • For avoidable works during the evening or weekend periods, the construction noise risks will be assessed based on the variation in the measured background level (dB LA90, 1hr) during the relevant period(s). Works must be "Low Impact" or "Managed Impact" in accordance with EPA Publication 1834.2. • For avoidable works during the night, the construction noise risks will be assessed based on the lowest measured background level (dB LA90, 1hr). Avoidable works will not occur at night where they are likely to be audible	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction	Accept, and recommend the measure specifies the auditor is to be independent from the project.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	within a residential premises, with night works limited to justified unavoidable works. Planned Unavoidable works • All unavoidable works that are planned for will be detailed in the Construction Environment Management Plan (CEMP), which will be reviewed and approved by ~~a qualified specialist~~ an environmental auditor in advance of the project commencing. • Unplanned Unavoidable or Unplanned out of hours works A list or rationale as to what defines acceptable unplanned unavoidable or unplanned out of hours work will be contained within the CEMP. The rationale will include the requirements for such works to occur and the required measures that will be considered to ensure the impacts will be effectively managed. • This will include the requirement for the preparation of a construction noise and vibration management plan for unplanned out-of-hours works. • An environmental auditor ~~qualified specialist~~, with skills and expertise in ~~health, safety~~ acoustics and the environment as relevant, independent from the project will be appointed to review and verify all planned and unplanned night work (10:00 pm to 7:00 am) activities to ensure that the works have been reviewed and justified accordance with Section 4.4 of EPA 1834, that all reasonably practicable work practices have been considered, and that community engagement has been undertaken.			
ONV-M003	The project will reduce construction vibration as far as is reasonably practicable to avoid unnecessary noise impacts upon sensitive receptors in accordance with the EPA Victoria Publication 1834.2 and the General Environment Duty. Additional management measures will be implemented where occupancies, structures and assets are within the safe working distances derived using the values in the following standards: • British Standard BS 6472-1:2008: Table 1 – Vibration dose value ranges which might result in various probabilities of adverse comment within residential buildings	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• German Standard DIN4150-3:2016-12: Table 1 – Guideline values for vibration velocity for evaluating the effects of short-term vibration on structures • German Standard DIN4150-3:2016-12: Table 3 – Guideline values for vibration velocity for evaluating the effects of short-term vibration on buried pipework • An asset owner's utility standards in consultation with the asset owners.			
ONV-M004	Adoption of noise reduction measures to be installed to the batching plant locations as follows: • A noise barrier will be installed to the site boundary at a height of 2.4 metres or 500 mm greater than the highest point on a static noise source within the site, whichever is the higher. • Any access gates will be solid and generally kept closed. • Where reasonably practicable, installation of enclosures or localised noise barriers around static equipment to provide a noise barrier between any particularly noisy construction works and the residences. • Adopting engineering noise controls for ancillary equipment (e.g. silencer, mufflers, enclosures) by all reasonably practicable means. • Where reasonably practicable, the quietest available equipment should be selected. The impacts and the design of site-specific mitigation will be determined prior to construction works via noise modelling and confirmed during construction via on site monitoring.	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction	
ONV-M005	Adoption of noise reduction measures to be installed adjacent to the shore crossing site as follows: • A noise barrier will be installed to the site boundary at a height of 2.4 metres. • Any access gates will be solid and generally kept closed, especially at night. • Where reasonably practicable, installation of enclosures or localised noise barriers around the shore crossing drilling equipment to provide a noise barrier between any particularly noisy construction works and the residences. • Adopting engineering noise controls for ancillary equipment (e.g. silencer, mufflers, enclosures) by all practical means using current technology.	Development of Construction Noise and Vibration Management Plan,- Part of Construction Environmental Management Plan (CEMP).	Construction	Accept, and recommend the measure specifies the auditor is to be independent from the project.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Where reasonably practicable, the quietest available equipment or process should be selected. • Where reasonably practicable, stationary equipment such as bentonite treatment, generators and pumps will be stored within shipping containers or suitable acoustic enclosures. The impacts and the design of site-specific mitigation will be determined prior to construction works via noise modelling and confirmed during construction via on site monitoring. An environmental auditor ~~qualified specialist~~, with skills and expertise in ~~health, safety~~ acoustics and the environment as relevant, will be appointed to review and verify all planned and unplanned night work (10:00 pm to 7:00 am) activities to ensure that the works have been reviewed and justified in accordance with Section 4.4 of EPA 1834, that all reasonably practicable work practices have been considered, and that community engagement has been undertaken. All planned unavoidable works will be detailed in the CEMP described in ONV-M002.			
ONV-M010	A decommissioning environmental management plan that includes noise and vibration impacts will be developed in due time. Should mitigation measures specific to decommissioning be identified, these will be designed, documented and implemented as soon as is reasonably practicable. The general principles provided in ONV-M001, ONV-M002 and ONV-M003 will be adopted for the decommissioning stage.	Development of Decommissioning Plan.	Decommissioning	
ONV-M007	As required by VPP clause 52.32-4, the proponent will provide a pre-construction (predictive) noise assessment report prepared by a suitably qualified and experienced acoustician that: • Reports on a pre-construction (predictive) noise assessment conducted in accordance with New Zealand Standard NZS6808:2010, Acoustics - Wind Farm Noise. • Provides an assessment of whether the proposed wind energy facility will comply with the noise limit for that facility under Division 5 Part 5.3 of the Environment Protection Regulations 2021. • Is prepared on the basis that the relevant noise standard under Division 5 of Part 5.3 of the Environment Protection Regulations 2021 will be New Zealand	Pre-construction (predictive) noise assessment.	Planning	.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Standard NZS6808:2010, Acoustics - Wind Farm Noise and includes an assessment of whether a high amenity noise limit is applicable under Section 5.3 of the standard.			
Traffic and transport				
TTP-M001	Implement a Communications and Stakeholder Engagement Plan to guide consultation with stakeholders during project construction, including in relation to transport matters. This includes engagement with relevant road authorities (including Wellington Shire Council). The plan will include mechanisms to obtain stakeholder input on transport management and protocols to give the community and other stakeholders adequate notice of any anticipated changes to transport conditions associated with works. While the Traffic Management Plan will detail the operational and safety aspects of traffic management and control, the plan will serve a broader function, ensuring transparent and ongoing communication throughout the project lifecycle.	Development and implementation of a Communications and Stakeholder engagement plan.	Construction	
TTP-M002	Develop and implement a Traffic Management Plan (TMP) to support onshore construction traffic. The TMP will be established prior to construction commencement and will serve as both a mitigation and monitoring tool. It will contain measures to maintain road safety and to minimise disruption to vehicle movements on roads in the vicinity of the project, parking, on-road public transport and emergency vehicle access. The TMP will be developed in consultation with the relevant road management authorities and consider: • Planning approval conditions relating to traffic management. • Relevant policy, regulatory and protocol requirements specific to construction traffic management. • Review and verification of existing conditions at the time the TMP is developed. • Approved project scope including finalised details on construction extents, staging, vehicle types, origins and destinations for construction materials and spoil) and peaks of construction activity.	Development and implementation of a Traffic Management Plan.	Pre-construction (prepare) Construction (implement)	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Cumulative impacts of other major projects in the local area which may change traffic conditions. • Verification of the final site access strategy, including staging nodes and secondary access points and crossovers to work sites (see TTP-M004 - Heavy vehicle transport route assessments). Upgrades at proposed access points will be subject to approval of relevant road authorities. • Other mitigation measures outlined in the transport impact assessment, including primary site access and secondary access requirements and heavy vehicle transport routes. The TMP mitigation measures will include: • Management of temporary road and traffic lane closures to maintain existing connectivity for local access, minimise the number and duration of closures and planning closures to occur outside of peak traffic periods. This includes the provision of adequate notice to local residents and communities and advisory signage such as variable message signs and protocols to ensure Parks Victoria and the Department of Energy, Environment and Climate Action are notified at least two months prior to commencement of works, including whether any potential road closures/impacts to the road network. A review of existing bus services should also be undertaken to confirm public and/or school bus services that may be affected prior to construction commencement and ensure minimal disruptions to school bus operation. • Development of suitable measures to ensure emergency service access (notably fire) is not inhibited by project construction activities. This will be done through engagement with emergency services to ensure access is maintained, especially during any public road and traffic lane closures. These requirements should be included as part of any broader emergency management plan that may be developed for the project. • Management of car parking associated with construction works to ensure that car parking is contained within the project boundary. If required car share or shuttle bus provisions will be considered.			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Routes to be used for construction vehicles travelling to and from the construction sites, recognising sensitive receptors, local access requirements and road users' safety to be agreed upon with relevant road authorities. • Pre-construction on-site checks to assess route options for safety and clearance to potential obstructions, such as wires, structures and trees for Oversize Overmass vehicles. • Requirement for pre-construction dilapidation surveys to be undertaken. This will include documentation of the condition of pavements and other road infrastructure such as bridges and culverts for roads which are to be utilised by construction traffic. Consultation with road asset owners will be undertaken to agree on the extent of pre-condition (dilapidation survey) survey extents and survey requirements (specialist vehicle condition or photographic), road maintenance criteria, treatments and response timeframes, post construction surveys, asset hand-back agreements and remediation should the project have an adverse impact on road condition. • Engagement with public and private bus operators (particularly operators of school buses) to provide information on transport changes anticipated as a consequence of construction including road and lane closures. • Temporary speed limits as appropriate to maintain intersection safety in the vicinity of primary site access and secondary access points with non-conforming sight distances on local roads, such as a reduced speed limit of 60 - 80km/h, particularly for limited durations during higher-risk construction periods. Temporary speed limit changes are subject to approval from relevant road authorities i.e. councils for local roads and the Department of Transport and Planning for arterial roads. • Provision of signage in accordance with Australian Standard AS 1742 indicating: – Locations of temporary speed limits – Movement of trucks from site access points to and from major road connections			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	– Access points where trucks are not permitted to enter. • Management of the risk of adverse impacts to road condition, operational efficiency and safety for road users associated with heavy vehicle movements on construction traffic routes. Where constraints are identified, mitigation measures such as temporary traffic controls, structural risk management and local road safety enhancements should be developed and managed as part of the project TMP in agreement with road authorities. • Provision of safe access to laydown areas and site compounds • Asset maintenance measures in agreement with relevant road authorities along nominated heavy vehicle routes. • Consideration of a driver's code of conduct for heavy vehicle drivers in consultation with the nominated transport contractor. The code of conduct is to include information relating to worker behaviour and adherence to the TMP and other matters (i.e. using approved routes, compliance with speed limits, parking in designated areas etc.). A list of measures to be outlined in the code of conduct include: – Inductions to inform workers of safety expectations travelling to and from the site and activities on site – Toolbox talks held at the start of the day/shift to discuss potential hazards – Regular inspections to ensure safe work practices – Vehicle registration numbers to be provided to the project for following up of any driver complaints. • Protocols to give the community and other stakeholders adequate notice of any anticipated changes to transport conditions in accordance with TTP-M001 – Communications and Stakeholder Engagement Plan. • Verify operating and working hours for construction. These will be consulted with key stakeholders. Construction will be in accordance with the approvals for unavoidable works as per EPA Victoria Publication 1834.2. • Implementation of control measures to minimise safety risk related to traffic and transport in case of inclement weather.			

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Minimisation of dirt and debris on roads by measures such as street sweeping, covering vehicle loads and vehicle cleaning. Other measures include wheel washes and sealing of access bell mouths. • Minimisation of noise and vibration impacts to sensitive receptors such as residences and schools by altering timing of travel to ensure reduced major works impacts where reasonably practicable (for example Woodside Primary School). • Minimisation of the need to transport waste from the site by reuse of materials where reasonably practicable. The TMP would set out a framework for subsequent development of work site specific TMPs by selected construction contractors where required. These specific TMPs would include further detail on the proposed management of transport issues on individual sites.			
TTP-M003	Road safety audits (RSAs) will be undertaken during the detailed design phase and prior to construction commencement to confirm the adequacy of roads for the proposed construction activities. These would indicatively occur at • Access points i.e. staging nodes and secondary access points onto both minor and major roads • Access roads and roads to be used and their intersections with the public road network • Along Hyland Highway (Traralgon Creek Road) and Hazelwood Road due to the crash history. RSAs will include consideration of emergency vehicle access and if road surface upgrades are required. RSAs will be completed by a pre-qualified RSA auditor from the Department of Transport and Planning and be independent to the project.	Records of Road Safety Audits and results.	Construction	
TTP-M004	An assessment of the proposed B-Double and Oversize Overmass transport routes between origins and destinations for oversize, loads, bulk materials and spoil will be undertaken once these have been confirmed. This will be undertaken prior to construction commencement and will include investigation of clearance to potential obstructions, such as wires, structures (bridges and culverts) and trees.	Assessment report of proposed B-Double and Oversize Overmass transport route.	Construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	The assessment will be completed by a transport specialist and conducted in consultation with relevant road authorities (including Councils) and other stakeholders and will identify any additional mitigation measures required.			
TTP-M005	A site access strategy will be developed in consultation with relevant road authorities and other stakeholders such as landowners, prior to construction commencement. The strategy will focus on locations and arrangements for site access points (primary and secondary) that will be investigated further to ensure safe entry and egress for construction vehicles (including heavy vehicles). This will include consideration of potential road section upgrade and appropriate design of access points intersecting with the public road network as required. It will take into consideration the existing local plantation traffic access and movements and other local amenities or facilities (including parks and reserves) in the vicinity of the access points. During detailed design the posted speed limit of roads intersecting with site access points will be reviewed and verified, where appropriate sight distances at site access points cannot be achieved. Any temporary speed limit change that may be considered is noted to be subject to approval from relevant road authorities i.e. councils for local roads and the Department of Transport and Planning responsible for arterial roads.	Development of a site access strategy as part of Traffic Management Plan.	Construction	
Air quality				
AQM-M001	• Minimise vegetation disturbance • Minimising the extent of disturbance as far as practicable • Minimise drop heights from loading or handling equipment • Locate stockpiles away from the residential areas and other sensitive receivers, if possible • Keep stockpiles for shortest time possible • Revegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.	Inclusion and implementation of dust suppression measures in CEMP.	Construction and decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Dust suppression will be used at construction areas, temporary access tracks and batching plants as required using water sprays, water carts, screens or other devices on: – unpaved work areas – sand, spoil and aggregate stockpiles – during the loading and unloading of dust generating materials. • Storage bays at batching plants to be enclosed on three sides and aggregate to be kept at least 0.5 metres below the top of panels and inside open end of bays. If required, additional screening over and above wall height can be installed.			
AQM-M002	• After arrival at the project site, vehicles, plant and equipment will remain within the construction footprint and designated areas. • Switch off engines when parked and/or minimise idling as far as reasonably practicable. • Limit vehicle speeds onsite to minimise the generation of dust in accordance with the EPA Publication 1834.2—Civil Construction, Building and Demolition Guide.	Inclusion and implementation of air emissions management dust suppression measures in CEMP.	Construction, operation and decommissioning	
AQM-M003	Crushed rock, crushed recycled concrete or other suitable material will be placed on existing unsealed access tracks if required and as agreed with relevant stakeholders to prevent vehicle movements raising dust.	Inclusion and implementation of dust suppression measures in CEMP.	Construction, operation and decommissioning	
AQM-M004	Construction vehicles with potential for loss of loads (such as dust or litter) will be covered when using public roads.	Inclusion and implementation of dust suppression measures in CEMP.	Construction and decommissioning	
AQM-M007	In the event that odorous soils are uncovered during construction, the following measures will be undertaken: • Cessation of ground disturbance at the location and within the immediate vicinity.	Stop works record and contamination assessment (if required).	Construction and decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Assessment of site contamination and determination of appropriate management actions in consultation with suitably qualified personnel. • If odorous material is found to be contaminated, notification to relevant authorities would be conducted in accordance with duty-to-notify requirements under the Environment Protection Act 2017.			
AQM-M008	• Plant and equipment will be maintained in good condition to minimise spills and air emissions that may cause nuisance. • Diesel vehicles and machinery will be fitted with diesel particulate filters.	Inclusion and implementation of air emissions management dust suppression measures in CEMP.	Construction, operation and decommissioning	
AQM-M009	• Personnel whose work could impact air quality related aspects should receive appropriate induction prior to working on the project site to ensure understanding of what actions/behaviours would be required to minimise nuisance dust and other air emissions. • Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Record any incidents that cause dust and/or air emissions, either on- or offsite, and the action taken to resolve the situation.	Inclusion of induction, complaints, and incident records as part of CEMP.	Construction, operation and decommissioning	
Victorian marine environment				
BHC-M01	A pre-construction non-destructive investigation (high-resolution geophysical surveys and/or remotely operated vehicle inspections) survey will be undertaken along the proposed cable routes (export cable, inter-array and interlink cables) and where foundations will be located within the Offshore Project Area (OPA). The targeted survey will be used to determine the location and extent of any high-profile reefs (reef greater than 0.5 metres) within the OPA. Should high-profile reef features be identified where infrastructure (such as foundations or cable trenching) is proposed to be located, appropriate measures (e.g. micro-siting) will be implemented to avoid direct impacts to these features, and on the basis of the extent of these features at the time of construction. A revision to the layout will be undertaken as per mitigation measure SNV-M11 and confirmed by the relevant Statutory Authority.	Survey results for detailed design geophysical campaign and as-built records from pre-construction clearance survey.	Pre-construction	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
BHC-M02	Seagrass distribution will be mapped pre-construction in Victorian waters based on the proposed export cable routes to enable the application of the mitigation hierarchy and to inform the application of a Flora and Fauna Guarantee Permit, if required.	Seagrass survey report and distribution maps. Flora and Fauna Guarantee Permit application (if required)	Pre-construction	
EMI-M01	Subsea cables will have a minimum depth of lowering (MDoL) of 1.0 metres for offshore export cable and 0.6 metres for inter-array cables.	Post-lay survey Report confirming cable burial depths and Ongoing monitoring of cable position and depth below the seabed (MEMP-M09).	Construction Operation	
LIT-M02	Routine monitoring on vessels will be undertaken to measure and detect the impacts of lighting and determine the extent of seabird fallout on vessels. If pre-defined trigger values for birds being attracted to vessels at night resulting in fallout are reached this will initiate review of the impact assessment and additional adaptive management depending on the species affected. See Section 16.3 for more detail. Vessel lighting will comply with the National Light Pollution Guidelines for Wildlife (DCCEEW, 2023), to limit the effects of artificial lighting on seabirds where these do not conflict with safety (i.e. needed for safe work and navigation). This includes: • the minimisation of light spill; • avoidance of long wavelength light sources; • avoidance of blue, violet or ultra-violet wavelengths; and • lighting in each maintenance area will be kept to the minimum requirement for safe passage when personnel are not required to be working in the area.	Development of Marine Operation Framework.	Construction Operations Decommissioning	
OFF-M02	During all phases of the project, all activities will be undertaken in accordance with the management actions provided in the Commonwealth "Threat abatement plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and ocean (2018)" to limit impacts of marine debris on	Vessel crew Induction record and Notification reporting of debris loss.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	sensitive marine receptors. The project will take practicable actions to avoid and minimise the loss of marine debris from offshore installations and project vessels. Appropriate training will be communicated during crew induction (OFF-M04). In the event of debris lost, if practicable, Star of the South will retrieve the debris. Reporting and monitoring will be undertaken according to the Environmental Management Framework.			
OFF-M04	During the construction period, only water-based drilling fluids (such as those containing xanthan gum and bentonite, or low toxicity alternatives) will be used for marine drilling activities, including trenchless installation of the shore crossing (at Reeves Beach) and drilling monopiles in the Offshore Windfarm Area (OWA) in the event of pile refusal. Low toxicity fluids will limit potential environmental harm, including impacts to sensitive marine receptors associated with decreased water quality.	Development of a Construction Environmental Management Plan	Construction	
OFF-M05	The project will commit to trenchless installation methods at the Reeves Beach shore crossing during the construction phase to minimise impacts to beach and dune shorebird habitat. Trenchless installation will be within the bounds of the project design envelope and include the following measures to avoid and minimise impacts to biodiversity values: • A suitably trained ecologist will check the beach for signs of nesting habitat for Hooded Plover. Should any nests be found, signage and designated no-go areas will be established to ensure impacts are avoided. • All construction equipment will be removed following the completion of construction and the ground conditions restored to agreed rehabilitation standards.	Development of a Construction Environmental Management Plan.	Construction	
OFF-M10	During all phases of the project, distribution of Notices To Mariners (NTMs) via the Australian Maritime Safety Authority (AMSA) and Safe Transport Victoria (STV) to notify third-party vessel operators of project vessel movements, the establishment of safety zones, and the placement of permanent infrastructure (see SNV-M09 Charting of final layout on navigational charts). NTMs will provide advice on aids to navigation (AtoNs), safety issues, dangers or hazards to navigation.	Record of Notice to Mariners publications.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	All NTMs will be published on the Australian Hydrographic Office (AHO) website and other local reporting as specified by the regulator. The Australian Maritime Safety Authority – Rescue Coordination Centre (AMSA - RCC) will also be advised of all project vessels' details, satellite communications and area of operation, as well as the relevant port authority. NTMs will be issued frequently for changes during construction and the schedule for issuing notices will be defined in consultation with AHO, AMSA and STV. Following completion of construction, a NTM will be issued to signal a change in the project phase from construction to operations, and the types of vessels that will be operating in the area for the next 30 years.			
OFF-M22	Stakeholder engagement will be undertaken during all phases of the project to ensure stakeholders have opportunities to raise issues and feedback, and for these to be assessed and responded to appropriately. Stakeholder communications will provide regular updates and advanced notice of planned activities throughout the project's construction, operations and decommissioning, so that stakeholders (including maritime users) can manage their activities accordingly. A range of accessible communication and engagement methods will be adopted to reach relevant stakeholders, including traditional (notifications, posters, meetings) and digital (social media, website) tools.	Development of a Communications and Stakeholder Engagement Plan.	Construction Operations Decommissioning	
SNV-M04	A cable burial risk assessment will be undertaken as part of detailed design to ensure that cables will be buried to adequate depth, for the safety of other marine users. Factors considered include shipping activity, use of anchors, fishing activity, substrate type and metocean conditions. Where possible cable burial will be the preferred option for cable protection. Where sufficient depth of cover cannot be achieved during installation, remedial protection will be used.	Cable burial risk assessment report.	Operations	
SNV-M05	During all phases of the project, all project vessels will have a safety management system (SMS) that will be signed off prior to use, ensuring compliance with relevant Australian and Victorian maritime regulations (including the Commonwealth Navigational Safety Act 2012, and the Victorian Marine Safety Act 2012), including vessel certification and licencing, pilotage	Development of Marine Operation Framework#.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	requirements and local knowledge certification (Corner Inlet). Project vessels will comply with incident reporting as required by Safe Transport Victoria (STV) and the Australian Maritime Safety Authority (AMSA). All vessels transiting from Port will adhere to International Association of Marine Aids to Navigation and Lighthouse Authorities' (IALA's) vessel traffic services (VTS) marine traffic guidelines. Project vessels using Corner Inlet must also hold a Certificate of Local Knowledge while entering, leaving or navigating within the Port of Corner inlet, as required by Safe Transport Victoria (STV) and Gippsland Ports. This ensures that all operators have an understanding of the local conditions, marine traffic and navigational aids.			
SNV-M07	During all phases of the project, a Vessel Passage Plan (VPP) will be produced by the vessel 'master for navigation' for relevant vessels entering Corner Inlet, in consultation with the Gippsland Ports Harbour Master as per requirements set out in the Port Information Handbook for the Port of Corner Inlet and Port Albert. The VPP is required on the first entry to the Port of Corner Inlet for relevant vessel classes, or if the vessel has not entered for a period exceeding six months. The vessel master must submit to the Harbour Master (or their delegate) a formal passage plan, to be lodged with the Notification of Arrival/Departure and Application for Berth form. The VPP, provides active management of vessels to reduce the choke points and provision of safe separation distances limiting impacts to third-party vessels and port congestion.	Development of Vessel Passage Plan#.	Construction Operations Decommissioning	
SNV-M09	Appropriate marking of offshore structures (both within the Offshore Windfarm Area (OWA) and Offshore Export Cable Area (OECA)), including the position of foundations and cables, on the Australian Hydrographic Office (AHO) nautical charts. Star of the South will provide as laid (final positioning) coordinates of project infrastructure to the AHO for charting. The timing of charting will be in consultation with the AHO and other relevant stakeholders such as the	Submission of as-built information to Australian Hydrographic Office.	Construction Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	Australian Maritime Safety Authority and the Offshore Infrastructure Regulator, to determine if marking of infrastructure is done progressively or once construction has been fully completed. The purpose of charting is to maximise awareness of the project allowing vessels to passage plan in advance.			
CRF-M08	The project seeks to coexist with other users of the marine environment, including commercial fishers. In any instances where coexistence is not safe or practical and other options to mitigate the impact have been exhausted, compensation will be provided as redress for commercial fishers that are affected by project activities (during all phases of the project). The project will develop, implement and maintain a Fisheries Liaison and Coexistence Plan ~~prior to construction and~~ which will apply throughout all relevant phases of the Project and must be incorporated into, or referenced by, the CEMP or OEMP as relevant. The Plan will describe the process through which potentially impacted commercial fishers can lodge a claim and be fairly assessed for compensation. The Fisheries Liaison and Coexistence Plan will include arrangements for: • consulting with affected commercial fishers • minimising interference with fishing activities, where reasonably practicable • providing advance notification of fishing restrictions • identifying eligibility, assessment of claims and dispute resolution processes for compensation claims.	Development of the Fisheries Liaison and Coexistence plan~~#~~.	Pre-construction (preparation of plan) Construction, operation and decommissioning (implementation) ~~All phases~~	
CRF-M09	The project will endeavour to provide opportunities for commercial fishers to obtain work on the project. Examples of opportunities include guard vessel duties, environmental monitoring or surveys. Information on project-related opportunities and the process for local industry to express interest in being involved will be shared during all phases of the project.	Development of the Fisheries Liaison and Coexistence plan#.	All phases	
SPL-M01	To minimise the likelihood of vessel collision and hydrocarbon release, project vessels (during all phases of the project) will comply with all statutory requirements, including MARPOL (Marine Order 97). This includes the following refuelling measures	Development of Marine Operation Framework#	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Wherever possible, routine refuelling of project vessels will occur in port; • Should refuelling be required at sea, refuelling will not occur within shipping lanes or areas of high traffic to minimise the likelihood of vessel collision and fuel spill. • Vessel fuel must only contain a maximum sulfur content of 0.50 per cent m/m in compliance with MARPOL and Marine Order 97. • Materials and equipment that have the potential to spill onto the deck or into the marine environment will be stored within a contained area. • Spill response kits will be available and routinely checked to ensure adequate stock is maintained. • Bunkering and bulk liquids will be transferred in accordance with bulk transfer procedures to reduce the risk of an unintentional release to sea during transfer. The procedures include standards for: – Certified equipment with confirmed integrity (e.g. hose and valves). – Transfer process (e.g. safety, communication, monitoring, inventory, emergency shut down procedures, procedural documents, and spill incident details).			
SPL-M02	Develop, implement and maintain a Spill Response Plan (SRP) in consultation with the Department of Transport and Planning for accidental hydrocarbon release from project activities within the marine environment, including prevention, response and management during all project phases to minimise risk to sensitive marine receptors. The SRP describes first strike management measures (initial response measures) for vessel spills until the Australian Maritime Safety Authority (AMSA) takes over the response as the designated Control Agency for vessel spills. If a spill was to occur the SRP would be activated and will include the following: • Initial response measures. • Notification and reporting requirements. • Determine if oil spill modelling and/or tracking buoys are required. • Monitoring of the spill such as water quality monitoring.	Development of Spill Response Plan#.	Construction Operations Decommissioning	Agree, and also agree to consequential updates to tables 26-4 (list of CEMP sub plans and other management documents) and 26-6 (list of OEMP sub plans and other management documents), accordingly.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Response tactics to be implemented, such as subsea or surface dispersants, mechanical dispersion, containment and recovery and in-situ burning, depending on the nature and scale of the spill. • Determine if shoreline protection and deflection and shoreline clean up are needed. • Monitoring and assessment of ecological impacts.			
VES-M01	To ensure vessel safety and to reduce the risk of accidents (such as vessel collision and fuel spills) the project will develop, implement and maintain a vessel operations framework to be approved by the regulator, in accordance with International and Australian maritime legislation, including: • the Convention on the International Regulations for Preventing Collisions at Sea (COLREGS) (implemented in Australia by Marine Order 30 (Prevention of collisions) 2016), • the International Convention for the Safety of Life at Sea (SOLAS) as part of the Navigation Act 2012 (lights and signals to be used by a vessel and to reduce potential vessel collisions), • the International Convention for the Prevention of Pollution from Ships (MARPOL) (regulations aimed at preventing both accidental pollution and pollution from routine vessel operations) implemented through the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Commonwealth), the Navigation Act 2012 (Commonwealth) and the Pollution of Waters by Oil and Noxious Substances Act 1986 (Victoria). All project vessels will ensure that they are operated in accordance with this framework (as required by vessel size and class) during every project stage (construction, operation and decommissioning) within both Commonwealth and State Waters (including at Port, transiting to and from the offshore project area and within the offshore project area). Star of the South will ensure that prior to procuring project vessels, all vessels have a record of inspections and compliance.	Development of Marine Operation Framework#.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
VES-M03	To minimise risk of third-party vessel interactions, a Marine Coordination Centre (MCC) will manage movements of project vessels to and within the Offshore Project Area (OPA). The marine coordination centre will also monitor third party vessels and aircraft around the project area. The marine coordination centre will operate 24/7 in the construction phase and in the operations phase it will be staffed during working hours and operate 24/7 during large scale maintenance campaigns such as blade replacement.	Marine Coordination centre operational records.	Construction Operations Decommissioning	
VES-M04	To reduce the likelihood of interactions with third party vessels or an accidental hydrocarbon release from a vessel collision occurring within the marine environment the following measures will be applied: • All construction, operations and decommissioning activities will occur within the designated Offshore Project Area (OPA) • Project vessels will use defined shipping routes between construction feeder ports and the OPA, as well as within Corner Inlet. Vessel routes will be further defined in consultation with relevant stakeholders. Deviation from recommended routes can occur for safety or environmental reasons. • All project vessels that require dynamic positioning (DP) will comply with the DP Certification scheme.	Development of Marine Operation Framework#.	Construction Operations Decommissioning	
VES-M05	Project vessels and subsea equipment will be compliant with relevant biosecurity legislation and guidelines, including: • Prior to commencing project activities, all installation and support vessels will have a project-approved Ballast Water Management Plan and a Ballast Water Management Certificate. • Reporting and management of ballast water will be in accordance with The Biosecurity Act 2015 and the Ballast Water Management Convention's Guidelines for Ballast Water Management and Development of Ballast Water Management Plans. • An Invasive Marine Species (IMS) risk Assessment Procedure (IMS- RAP) will be undertaken in accordance with the International Maritime Organisation Guidelines for the Management of Ships Biofouling for all vessels undertaking project activities, and the vessel will be confirmed to be a low	Development of Marine Operation Framework# and audit of project vessels.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	biosecurity risk before approval to enter the Offshore Project Area (OPA) and Corner Inlet. • Biosecurity clearance prior to entering Australian Waters for foreign vessels: o Vessels that are intending to discharge internationally sourced ballast water within Australian waters must submit a Ballast Water Report through Maritime Arrivals Reporting System (MARS) at least 12 hours prior to arrival to gain biosecurity clearance. • Ballast tank sediment must be disposed of in an area outside 200 nautical miles from the nearest land, and in at least a depth of 200 metres, or at an approved land-based reception facility. • Management of anti-fouling and in-water cleaning in accordance with the Australian anti-fouling and in-water cleaning guidelines.			
VES-M06	All project vessels will implement the following requirements during all project phases (construction, operation and decommissioning) as prescribed by the EPBC Regulations 2000 Part 8 and Victorian State Wildlife (Marine Mammal) Regulations 2019 to minimise the risk of collision with a whale or dolphin: • Implementation of 'no approach' and 'caution' zones for whales, dolphins and seals: – No approach zone (whales): within 100 metres of a whale, and within 300 metres to the front and rear of a whale – No approach zone (dolphins): within 50 metres of a dolphin, and 150 metres in front and to the rear of a dolphin o No approach zone (seals): within 30 metres of a seal, if the seal is on land or a haul out; or within 5 metres if the seal is on water infrastructure within state waters – Caution zone (whales): within 300 metres of a whale – Caution zone (dolphins): within 150 metres of a dolphin. – Vessels must not enter the 'no approach zone' and must not wait in front of the direction of travel when a calf is present.	Development of Marine Operation Framework#, Marine mammal and turtle monitoring and management plan# and marine mammal observation records.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
UWN-M06	Sufficient dedicated MFOs and vessels deployed to ensure visible coverage of the precaution zone based on the final round of modelling, as per the Construction Underwater Noise Management Framework. Any personnel that will be used as dedicated MFOs will be suitably qualified and experienced in accordance with EPBC Act PS 2.1.	Development of Marine mammal and turtle monitoring and management plan# and MMO Field Logs.	Construction	
UWN-M15	If reasonably practicable, the project will avoid installing the export cable within the SRW reproduction BIA during the months of May to September. If this is not reasonably practicable, and a SRW is detected by the vessel MFO, DP will be powered down to the lowest possible safe setting. DP will not be powered up until there has been a 30 minute pre-start observation period and at least 30 minutes has elapsed since the most recent sighting of a SRW. This measure is designed to limit operations during periods when southern right whales are utilising the area.	Development of Marine mammal and turtle monitoring and management plan#.	Construction	
UWN-M176	Vessels operating dynamic positioning thrusters during construction will implement marine fauna mitigation procedures for vessels operating on dynamic positioning in Victorian waters. These will include: • Establishing precaution zones based on verified noise modelling and applicable marine mammals noise thresholds (EPBC Act PS 2.1 – B.4); • Marine Fauna Observers (EPBC Act PS 2.1 - A.2 and, during the Southern Right Whale reproduction season from May to September, B.1) • Undertaking marine fauna surveillance for 30 minutes prior to dynamic positioning startup (EPBC Act PS 2.1 - A.3.1); • If a marine mammal is detected during pre-start up surveillance, dynamic positioning must not commence until the animal has moved outside the precaution zone or 30 minutes has lapsed since the last sighting (EPBC Act PS2. - A.3.3);	Development of Marine mammal and turtle monitoring and management plan.	Construction and decommissioning	Recommend amending to include requirement for verification of underwater noise predictions and the implementation of adaptive management should impacts be greater than predicted in the EES.

Measure ID	Description	Performance indicator	Stage	Minister's assessment
	• Continuous daylight visual surveillance of relevant precaution zones by Marine Fauna Observers during dynamic positioning operations (EPBC Act PS 2.1 – A.3.4); • Operational procedures including delayed start-up, power down of dynamic positioning thrusters and re-start where marine mammals are detected within the relevant precaution zone (EPBC Act PS 2.1 – A.3.4 and A.3.5); • Application of night-time and low-visibility procedures where effective detection cannot be demonstrated (EPBC Act PS 2.1 – A.3.6, B.2 and B.5); and • Adaptive management procedures for vessel operations on dynamic positioning (EPBC Act PS2.1 – B.6) implemented if marine mammal behaviour, occurrence or abundance is different to what has been predicted for the noise management.			
VES-M07	Where reasonably practicable, installation and use of propeller guards on propeller operated vessels utilising the Port of Corner Inlet throughout all phases of the project.	Development of Marine Operation Framework# and. Installation records of propeller guards.	Construction Operations Decommissioning	
VES-M08	Routine discharges No routine discharges within 500 m of the boundaries of State or Australian marine parks, the southern right whale reproduction BIA / HCTS (between May and September), or if a marine mammal or turtle is within 500 metres of the vessel. Accidental Discharges In the event of an accidental discharge from a vessel, the discharge will be reported and monitored, including recording of any marine mammals and turtles that encounter the discharge.	Development of Marine Operation Framework#	Construction Operations Decommissioning	
VES-M09	Provide an environmental induction to all crew member(s) including training for marine mammal observations whilst vessels are in transit.	Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Operations Decommissioning	

Measure ID	Description	Performance indicator	Stage	Minister's assessment
VES-M10	Project vessels working on the transmission cable in the southern right whale Biologically Important Area (BIA) for reproduction will maintain a speed of less than 10 knots) during peak calving months of May to September.	Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Decommissioning	
VES-M11	Vessels will watch and act for the presence of southern right whales and blue whales during all project phases. If a southern right whale or blue whale is sighted: • Increased caution zone to 500 m • Reduced vessel speed to 5 knots within the caution zone.	Vessel crew Induction record and records of marine mammals observations. Development of Marine Operation Framework# and Marine mammal and turtle monitoring and management plan#.	Construction Operations	
DEC-M01	A Marine Decommissioning Management Plan will be developed prior to decommissioning activities commencing to assess the impacts on the final agreed methodologies of removing offshore infrastructure. The plan will include: Details on marine infrastructure proposed to be removed or left in situ Assess potential impacts of decommissioning activities for the removal or retention of infrastructure on protected matters Specify how activities associated with decommissioning will be carried out in accordance with the project approval conditions Describe measures to be implemented to avoid or reduce impacts arising from the removal of infrastructure (if required) Consider management measures adopted in construction and apply where similar impacts could occur.	Development of Marine Decommissioning Management Plan.	Decommissioning	
OFF-M23	If temporary mooring lines are utilised, lines will be subject to regular monitoring and ensured that they will not remain slack. Entanglement incident responses will be proactively developed in the Vessel Operation Framework, to ensure a timely response.	Development of Marine mammal and turtle monitoring and management plan#	Construction Operations	

Note - #: As relevant to project activities in Victorian coastal waters

Table A2: Recommended changes to proposed monitoring and contingency measures

Measure ID	Title	Description	Stage	Minister's assessment
AGM-M009	Landholder reporting mechanism	The Construction Environmental Management Plan and Property Management Plan should include a process for landholders to report any issues with construction activity or with the easement, particularly those that are unexpected or have not been anticipated.	Construction	
AGM-M010	Agriculture and forestry operational monitoring and communications	The Operation Environmental Management Plan will include a systematic monitoring program that covers biosecurity, rehabilitation, soil erosion, and other issues identified in the CEMP and PMP. This program will also detail required responses if issues are detected during the annual monitoring. The OEMP will also include a communication plan to ensure there is a process for affected landholders to report any issues with operation activities.	Operation	
AQM-M005	Weather monitoring and management for extreme conditions	Weather conditions will be monitored for extreme heat and/or wind events using systems such as the Bureau of Meteorology forecasts and works will be modified if conditions are likely to result in air quality impacts at sensitive receptors.	Construction and decommissioning	
AQM-M006	Visual dust monitoring and management procedures	• Carry out regular site inspections to monitor compliance with management plan, record inspection results, and make an inspection log available to relevant regulatory authority when asked. • Increase the frequency of site inspections when activities are close to sensitive receptors, activities with a high potential to produce dust are being carried out, or during prolonged dry or windy conditions. • If dust is observed to be causing a hazard, review and make sure best practice dust management measures are appropriately implemented. If dust levels cannot be contained, works will be modified or stopped until the dust hazard is reduced to a manageable level.	Construction and decommissioning	
AQM-M010	Performance monitoring and continuous improvement	Conduct ongoing performance evaluation through monitoring and continuous improvement to ensure ongoing compliance with all mitigation measures.	Construction, operation and decommissioning	

Measure ID	Title	Description	Stage	Minister's assessment
EME-M002	Design verification methods in accordance with Energy Network Energy Network Association (ENA) Electric and Magnetic Fields Management Handbook	A design verification strategy will be employed to demonstrate compliance through measurement, that the onshore cables operate below the exposure reference levels set out in Australian Radiation Protection and Nuclear Safety Agency guidance. Verification methods shall include baseline survey prior to construction followed by measurement at the same locations under operational loads. In the event that levels exceed these thresholds, corrective measures will be applied as reasonably practicable to reduce exposure to within compliance levels.	Construction Operation	
GWM-M004	Acid Sulfate Soil Management Plan Implementation	Monitoring and contingency measures documented in the Acid Sulfate Soil Management Plan (refer to GWM-M003) will be implemented.	Construction	
HHM-M005	Monitoring and review of Historical Heritage mitigations	Conduct monthly reviews of compliance against HHM-M002, HHM-M004, and HHM-M006.	Construction	
HHM-M006	Reinstatement of heritage values	In the event of accidental damage of a heritage feature (non-archaeological), a process will be implemented to assess and manage any accidental damage to potential heritage places in consultation with a suitably qualified heritage practitioner. Any reconstruction works should be undertaken under the direction of a suitably qualified heritage practitioner.	Construction	
ONV-M008	Noise and vibration monitoring	Attended noise and vibration monitoring will be undertaken during construction at the start of any new activity with the potential to produce perceptible noise and vibration at sensitive receiver for the purposes of assessing the scope of the noise mitigation in use or following a complaint, as defined in the construction environment management plan: • The nearest noise sensitive residential property or properties impacted by out-of-hours works to confirm the effective implementation of noise mitigation measures (subject to landholder approval).	Construction	

Measure ID	Title	Description	Stage	Minister's assessment
		• The nearest building or assets that are within derived set back distances for structural damage or in response to a complaint (subject to landholder approval). • Where an asset owner's utility standards are at risk of being exceeded. • It should be noted that monitoring should not be limited to verifying compliance with regulations and/or nominated criteria (if relevant); it should also be used pro-actively to validate the effectiveness of mitigation measures and to inform continual improvement. Where reasonably practicable, unattended noise monitors will be installed for the duration of the shore crossing drilling and offshore piling at the nearest affected residences (subject to landholder approval). The scope of the unattended monitoring will be determined by a suitably qualified acoustic consultant in consultation with the relevant authority for noise and vibration regulations at the time of works A response framework will be developed to manage potential impacts if nominated criteria are exceeded, including: • Actions taken to rectify the exceedance • Actions to minimise risk of reoccurrence • Name of person(s) responsible for undertaking the required actions. The duration of the attended monitoring will be determined by a suitably qualified acoustic consultant in consultation with the relevant authority for noise and vibration regulations at the time of works.		
ONV-M011	Decommissioning review and establishment of noise framework	A review of decommissioning activities will be conducted by the end of life of the project to plan decommissioning and establish the framework to manage noise impacts. It is expected that the general principles provided in ONV-M010 and ONV-M008 will be adopted for the decommissioning stage.	Decommissioning	

Measure ID	Title	Description	Stage	Minister's assessment
SUM-M015	Water quality monitoring	Implement a water quality monitoring program during the construction phase to monitor changes in water quality and ensure all discharges from the proposed works are in accordance with the legislative requirements. Where feasible, the baseline water quality assessments will be carried out at key project locations. This will include sampling upstream and downstream of an identified discharge point, and where feasible, real-time monitoring of turbidity in surface water runoff. The water quality monitoring program will be documented in the Construction Environmental Management Plan (CEMP), with more specific details contained in the surface water management plan (SWMP), including water quality parameters, locations (including at least one location between the shore crossing and the Corner Inlet Ramsar site) and frequency. The SWMP will also outline additional and/or improved measures that would be implemented should those controls fail or are not effective to eliminate or minimise risks of harm to surface water. The water quality monitoring program will be guided by multiple references and guidelines including the ERS, baseline water quality assessment results, and soil assessment reports conducted as part of geotechnical investigations. The water quality monitoring program will also be conducted in line with EPA Publication IWRG701: Sampling and analysis of waters, wastewaters, soils and wastes.	Construction	
SUM-M016	Planned inspections	Implement a program of periodic inspections of the easements to ensure reinstated earthworks continue to maintain existing flow characteristics and water quality.	Operation	
GWM-M005	Onshore trench route inspection	The Onshore Operation Environmental Management Plan will include the following monitoring measure: In the event that thermal sand is used to backfill the onshore trench, the onshore trench route will be inspected following the first winter post-construction in order to check for areas of waterlogging that could be a result of groundwater discharge along preferential pathways. A suitably qualified person will determine whether any waterlogging identified is likely to be caused by trench (taking into account landscape location and pre-	Operation	

Measure ID	Title	Description	Stage	Minister's assessment
		construction conditions), and if so, recommend contingency measures to address the impact.		
MEMP-M03	Seabird Monitoring and Management Plan	Seabird Monitoring and Management Plan (SMMP), including monitoring and adaptive management arrangements, will be developed and implemented prior to offshore construction. The SMMP will outline approaches and objectives of monitoring for the project key impacts and risks and approaches to management in the event that results indicate that additional measures are needed. Offsets will be developed as necessary and informed by strategies and actions outlined in National Species Recovery Plans and other plans of management.	Construction Operations	
MEMP-M05	Coastal Monitoring	Precautionary monitoring of coastal change based on satellite imagery such as Geoscience Australia's Digital Earth Australia database and/or the Victorian Coastal Monitoring Program (VCMP) database will commence 1 year prior to construction and will continue for the operational life of the Project to detect any changes to coastal landforms outside the range of natural variation (i.e. sediment accumulation and/or erosion). The Proponent will obtain and archive data from Digital Earth Australia and the Victorian Coastal Monitoring Program annually. Data will be analysed every three years for changes contrary to model predictions. As an adaptive management measure, should changes to the coastal system be identified (CPS-C01) as being due to the project (and not part of the natural variability or response to climate change), the Proponent will work with regulators to establish appropriate mitigation measures (or offsets).	Pre-construction, construction and operation	Not accepted, I do not support the recommendation to reinstate this measure in the Victorian EMF.
MEMP-M06	Monitoring of benthic habitats	A robust monitoring program will be designed to assess the impact of seabed disturbance on benthic habitats from project construction activities and to inform management decisions. The program will be carried out by suitably trained and competent personnel and be designed to enable detection of receptor recovery over time through the sampling of representative benthic habitats. The program will be informed by input from stakeholders, regulatory guidance and aligned with reputable, published monitoring standards.	Construction Operation	

Measure ID	Title	Description	Stage	Minister's assessment
MEMP-M07	Monitoring of fish assemblage and key species	A robust fish monitoring program will be implemented during project construction and operation to assess environmental performance and inform management decisions. The program will enable comparison of data with spatial/temporal references, including baseline data collected during the Marine Ecology Survey Program. Adaptive management An adaptive management process will be adopted to respond to monitoring results where necessary. This process will consider the project activities and other relevant data collected by the project at the time. The management process will implement appropriate actions where required, considering the spatial and temporal nature of the monitoring results.	Construction Operation	
MEMP-M09	Cable Burial survey and monitoring	Post-lay survey and ongoing monitoring of cable position and depth below the seabed. A Remedial Burial Strategy (RBS) will be implemented when the inter-array or offshore export cables are thought to be inadequately buried, with the intent to ensure the cable is reburied to the required depth standard. The RBS will comprise an initial DoB survey and analysis of seabed conditions, sediment types and other factors including environmental sensitivities, followed by a risk assessment to confirm reburial options and, where necessary, reburial to defined MDoL using a suitable remedial burial method (defined in the RBS).	Construction Operation	
BTM-M007	Stakeholder Engagement Plan – boat ramps	In order to gauge how the project is affecting the preferences of boat users and recreational fishers at boat ramps, the stakeholder engagement will provide evidence for potential infrastructure improvements or demand management measures.	Construction and operation	
BTM-M008	Workforce Housing Monitor	Monitor the number and share of project workers who live in the region or who move to the region. Identify the type of accommodation used by each worker who moves into the region. This data can be used to monitor and adjust the Workforce Accommodation Strategy, if required.	Construction and operation	

Measure ID	Title	Description	Stage	Minister's assessment
BTM-M009	Accommodation Surveys	Monitor visitation to the local study area through accommodation surveys in order to understand impacts on tourism businesses. This could include asking a range of accommodation providers to continually report on their occupancy in order to gauge the ongoing state of the industry and the availability of short term accommodation for the project. This will be necessary in monitoring the Workforce Accommodation Strategy.	Construction and operation	
SCH-M006	Unexpected finds protocols	Develop and maintain an unexpected finds protocol for the unexpected discovery of Aboriginal cultural heritage material. The unexpected finds protocol will lay out the process by which any Aboriginal archaeological material that is found unexpectedly (such as within geotechnical samples or through seabed inspections) is managed. The protocol includes the nomination of a suitably qualified and experienced archaeologist to whom any finds are reported. The archaeologist will then undertake an assessment of the finds to establish the appropriate pathways for reporting, recording, and assessment of the material, and establish whether additional further actions such as establishment of exclusion zones, further intervention or investigative work is required. The unexpected finds protocols will be outlined in the Cultural Heritage Management Plan for State Waters (SCH-M007) and the UCH Management Plan for Commonwealth Waters.	Prepared and Agreed Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning.	
SCH-M007	The preparation of a Cultural Heritage Management Plan with contingency protocols pertaining to Submerged Aboriginal Cultural Heritage in State Waters	Prepare, gain approval, and implement conditions of a Cultural Heritage Management Plan (CHMP) in accordance with the Aboriginal Heritage Act 2006 (Vic). Comply with contingency protocols outlined in the CHMP. The CHMP will include specific contingency protocols pertaining to Submerged Aboriginal Cultural Heritage located within State Waters (also see AHM-01; AHM-07).	Prepared and Approved Pre-Construction. Active during Pre-Construction, Construction, Operation, Decommissioning.	


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