Environmental Management Framework

Macorna Wind Farm

Faulkner Road, Tragowel 3579

For Atmos

14 August 2026

cogency

Planning | Engagement | Strategy

Document Details

Macorna Wind Farm

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Document history

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We celebrate the physical and spiritual connections between Indigenous people and place expressed through the Birrarung Wilam (Common Ground) art project on the banks of Melbourne's Yarra River.

Acknowledgement of Country

Cogency acknowledges the Traditional Owners and Custodians of the land on which we meet, work and write, the Wurundjeri Woi-wurrung peoples of the Kulin nation, and their connections to land, sea, and community. We pay our respect to their Elders past and present and emerging.

Cogency also extends that respect and acknowledges the Traditional Custodians of Macorna, the Barapa Barapa. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and waterways. We also recognise the resilience, strength, and pride of the Barapa Barapa and First Nations communities and acknowledge that Sovereignty was never ceded.

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Glossary

Abbreviation	Meaning
BAM Plan	Bat and Avifauna Management Plan
CEMP	Construction Environment Management Plan
CHMP	Cultural Heritage Management Plan
Cogency	Cogency Australia Pty Ltd
CPT	Cone Penetration Testing
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEECA	Department of Energy, Environment and Climate Action (previously the Department of Environment, Land Water and Planning [DELWP])
DMP	Dust Management Plan
DTP	Department of Transport and Planning
EES	Environment Effects Statement
EMF	Environmental Management Framework
EMI	Electromagnetic Interference
EMP	Environmental Management Plan
EMS	Environmental Management System
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
FFG Act	*Flora and Fauna Guarantee Act 1988*
LGA	Local government area
MW	Megawatt
NMM	Noise Management Mode
OEMP	Operation Environment Management Plan
P&E Act	*Planning and Environment Act 1987*
Project	Macorna Wind Farm
Proponent	Atmos Renewables (Atmos) on behalf of Macorna SPV - Atmos MWV Pty Ltd as trustee for the Atmos MHV Trust
SM	Sector Management
SWMS	Stormwater Management Strategies
TMP	Traffic Management Plan
TPZ	Tree Protection Zones
Turbines	Wind turbine generators

1. Introduction

The Macorna Wind Farm Project (the Project) is a proposed approximately 820.8 megawatt (MW) wind farm comprised of up to 114 wind turbine generators (turbines) at Faulkner Road, Tragowel 3579. The Project is within and surrounding the locality of Macorna in the Gannawarra Shire and Loddon Shire local government areas (LGAs), located within Victoria's Loddon Mallee Region.

This Environmental Management Framework (EMF) has been prepared by Cogency Australia Pty Ltd (Cogency), for Atmos Renewables (Atmos) on behalf of Atmos MWV Pty Ltd as trustee for the Atmos MHV Trust (the Proponent).

The EMF supports the Environment Effects Statement (EES) referral for the Project and seeks to provide a transparent and consistent framework for managing environmental risk and mitigating potential adverse effects throughout detailed design, construction, operation and decommissioning of the Project. The preparation of this EMF has been informed by the findings and recommendations of the technical assessments prepared to support the referral by suitably qualified specialist consultants.

Impact avoidance and minimisation has been central to the planning and development strategy of the Project. Overall, due to the strong avoidance and minimisation approach embedded in the Project's design, the residual impacts on the environment, including flora and fauna, are not expected to be significant at a local or regional scale.

Through its implementation, the EMF will ensure that the environmental risks and potential impacts of the Project are avoided to the fullest extent possible, and are effectively managed where impacts and risks are unavoidable.

It is expected that this EMF will continue to evolve throughout the development of the Project as the design refinements and technical assessments continue.

1.1 Structure

The EMF is set out as follows:

- Outline the purpose, structure and approval frameworks applicable to the Project (Chapter 1).
- Provide an overview of the governance framework and roles and responsibilities of the Project and Proponent (Chapter 2).
- Outline the relevant environmental management documentation, ongoing pre-approval avoidance and minimisation commitments, and applicable mitigation measures (Chapter 3).
- Provide an overview of the change management process which is proposed to apply, following approval, should changes to the layout or associated construction footprint be warranted (Chapter 4).
- Set out the process for evaluating performance and compliance (Chapter 5).

1.2 Relationship to approval frameworks

The Project is expected to require assessment and approval under Commonwealth and State legislation. Primary approvals are expected to be required under:

- The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) – following referral, the National Environmental Protection Agency (NEPA) will determine whether the Project constitutes a 'controlled action' and requires further assessment and approval from the Commonwealth Minister for the Environment and Water.
- The *Planning and Environment Act 1987* (Vic) (P&E Act) – planning approval for the use and development of land will be required in the form of a Planning Permit or Planning Scheme Amendment.

- *Aboriginal Heritage Act 2006* (Vic) – approval of a Cultural Heritage Management Plan (CHMP) will be required.

A number of other approvals, consents and authorisations may be required, including:

- Approvals under the *Civil Aviation Safety Regulations 1998* (Cth) in relation to potential impacts on aviation safety, including obstacle lighting and airspace requirements for wind turbines.
- Assessment under the *Environment Effects Act 1978* (Vic) subject to assessment and decision from the Minister for Planning as to whether an Environment Effects Statement (EES) is required.
- Consent for works within a road reserve pursuant to the *Road Management Act 2004* (Vic).
- A works on waterways permit for works affecting designated waterways and take and use licences for dewatering and dust control during construction, if required, pursuant to the *Water Act 1989* (Vic).
- A permit for works impacting historic heritage places pursuant to the *Heritage Act 2017* (Vic), where applicable.
- Permit to take protected flora pursuant to the *Flora and Fauna Guarantee Act 1988* (Vic) (FFG Act).
- Authorisation to take, control or manage protected wildlife under the *Wildlife Act 1975* (Vic).
- A licence or lease for occupation and use of Crown land under the *Crown (Land Reserves) Act 1978* (Vic) where works are required on Crown land.
- Consent for works near electricity infrastructure and compliance with safety requirements under the *Electricity Safety Act 1998* (Vic).
- A generation licence under the *Electricity Industry Act 2000* (Vic) to generate, distribute and sell electricity.
- Consent to occupy or use unreserved Crown land under the *Land Act 1958* (Vic) for any works on unreserved Crown land and freehold land.

The outcome of the above assessments, approvals, consents and authorisations will continue to shape this EMF as the Project develops.

Figure 1, below, provides a broad overview of key assessments, approvals, consents and authorisations which may apply.

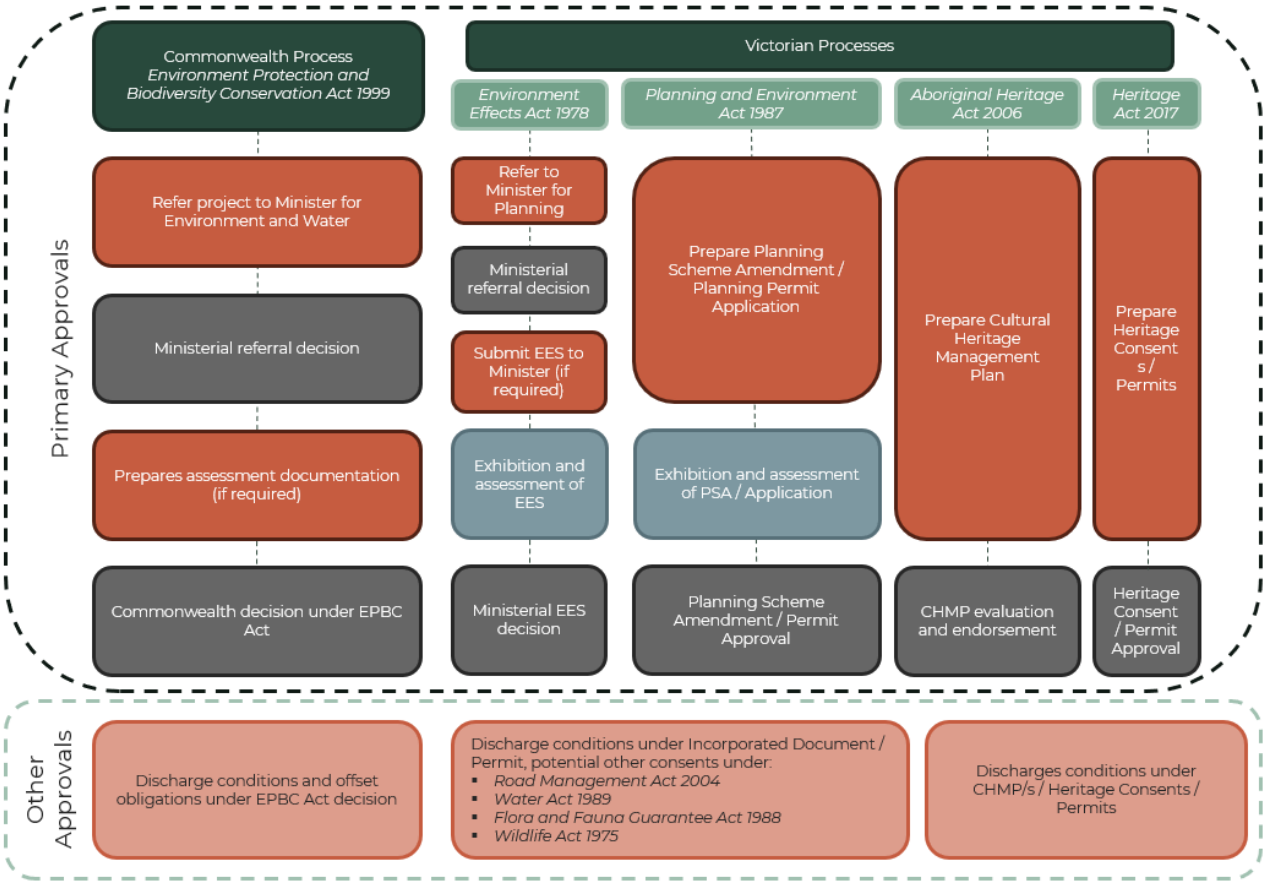

Figure 1 – Broad overview of planning and environmental approvals process

2. Roles and responsibilities

The following table outlines the various stakeholders and associated roles, responsibilities, accountabilities and governance arrangements for implementing the EMF during the construction and operation of the Project.

Table 1 – Environmental management roles and responsibilities

Role	Responsibility
Commonwealth Minister for the Environment and Water	▪ Assess and determine approval requirements on EPBC Act matters. ▪ Review and approve management plans relevant to EPBC Act matters as required by any conditions of approval under the EPBC Act..
Victorian Minister for Planning	▪ Decide whether an EES is required to assess the environmental effects of the Project. ▪ Assess and determine the planning approval as the Responsible Authority, including appropriate conditions. ▪ Review the mitigation measures as recommend by technical specialists and relevant regulatory agencies in statutory approvals or as part of their assessment of the EES (if required).
First Peoples-State Relations	▪ Assess and approve the Project CHMP as a Registered Aboriginal Party has not been appointed for the Project Area.
Proponent	▪ Ensure compliance with approval documents, including the Planning Permit or Planning Scheme Amendment, and CHMP ▪ Revise and update the EMF and mitigation measures in response to the relevant matters and recommendations contained in technical reports and approval and regulatory authority assessments. ▪ Submit EMF to Minister for endorsement if required under conditions of planning approval. ▪ Review and approve management plans prepared by contractors. ▪ Monitor compliance with the mitigation measures. ▪ Manage and engage contractors and technical specialists throughout construction, operation and decommissioning of the Project. ▪ Develop and maintain a Project environmental risk register. ▪ Conduct an environmental audit prior to commencement of main construction works to audit compliance with planning approval conditions. ▪ Provide reports summarising compliance with the planning approval conditions and/or environmental performance to relevant regulators according to statutory requirements. ▪ Liaise with regulators, experts and other relevant parties as required. ▪ Undertake stakeholder and community consultation activities throughout the life of the Project.
Contractors	▪ Develop and implement a Project-specific EMS or apply an existing or adapted corporate EMS to the specific activities relevant to the Project works that are the subject of the Project contract. The EMS will be certified to AS/NZS ISO 14001 and, to the extent relevant, consistent with the Proponent's EMS. ▪ Comply with legislative and approval requirements, including the approved EMF, and the EMS. ▪ Prepare and implement management plans in accordance with legislative and approval requirements, including the EMF. ▪ Conduct monitoring, auditing and reporting as required. ▪ Receive audit reports from the independent environmental auditor as relevant to activities, conduct internal compliance audits and, provide compliance reporting to relevant authorities and undertake any corrective compliance activities as required addressing issues raised.
Regulators and agencies	▪ Review and assess applications and decide whether to grant approvals, consents and authorisations as required. ▪ Review, comment and where necessary approve relevant plans and documents as required by the planning approval conditions.

3. Environmental management documentation

This EMF provides a framework for how environmental risks will be managed prior to and throughout the construction, operation and decommissioning phases of the Project. It is anticipated, that this EMF will continue to evolve throughout the development of the Project as the design refinements and technical assessments continue.

In anticipation of commencement of construction, an EMS will be developed and maintained in accordance with AS/NZS ISO 14001.

It is also expected that a number of management plans will be developed to avoid, minimise and manage adverse effects on the environment, as identified via technical assessments, including:

- Construction Environmental Management Plan
- Operation Environmental Management Plan
- Workforce Accommodation Management Plan
- Traffic Management Plan/s
- Stormwater / Surface Water Management Plan
- Dewatering Management Plan
- Acid Sulphate Soils Management Plan
- Bushfire Emergency Management Plan
- Native Vegetation Management Plan
- Offset Management Plan
- Bat and Avifauna Management Plan
- Noise and Vibration Management Plan
- Weed, Pest and Pathogen Management Plan
- Community and Stakeholder Engagement Plan.

3.1 Ongoing avoidance and minimisation commitments prior to approval

Throughout the development process, the Project has already incorporated a number of inputs, including infrastructure and energy requirements, landowner, neighbour, community and stakeholder feedback and technical assessments through an iterative design process.

This iterative design process has included several steps to refine overall site selection, individual turbine siting, buffer distances between all related infrastructure and sensitive ecological vales, balance of plant layout, and construction development footprint. These revisions have been methodically made to avoid and minimise impacts of the Project on the land, environment and community.

The Proponent has committed to undertaking a number of studies and incorporating further inputs prior to Project approval to finalise Project design and planning activities, confirm the presence of native flora and actual or potential fauna habitat, and confirm fauna utilisation of the site including avifauna and bats. These pre-approval activities form part of the Proponent's commitment to exhausting avoidance and minimisation measures before undertaking mitigation and if required, compensatory activities.

Pre-approval commitments and further Project iterative design measures made by the Proponent are set out at Table 2.

Further, as outlined in Chapter 3.2 and Table **3**, the Proponent has committed to the early development of all required management plans and the commencement of pre-construction activities informed by technical

specialists, government agencies and relevant stakeholders. These commitments encompass ongoing avoidance and minimisation measures that will be applied during the pre-construction phase and carried forward through construction and the operational life of the Project.

Table 2 – Pre-approval commitments

Measure ID	Pre-approval avoidance and minimisation measures	Phase	Responsibility
Design and planning			
DP01	**Continued design iterations to avoid and minimise impacts** The Project shall, to the extent practicable, minimise the construction footprint and avoid impacts on the environment through: ▪ Further refine the siting of turbines, access tracks and other ancillary infrastructure primarily in areas previously disturbed (e.g. hardstand areas of paddocks improved with irrigation infrastructure), or along or immediately adjacent to existing access tracks. ▪ Integrate all technical expert recommendations regarding micro-siting of turbines where possible. ▪ Follow the avoid, minimise and compensate / offset protocols in the *Handbook for the development of renewable energy in Victoria* (the Handbook) (DEECA 2025) and the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP 2017), and as advised by ecological consultants. ▪ Avoid the removal of woodland habitat, hollow bearing trees and large trees within the construction footprint, unless unavoidable. ▪ Avoid, where possible, areas of native vegetation that support rare and threatened flora species. ▪ Move infrastructure outside of confirmed Potential Brolga Breeding Wetland buffers in accordance with Appendix 2 of the Handbook, unless unavoidable. ▪ Include a minimum 300m buffer from confirmed Black Falcon and Wedge-tailed Eagle nest sites. ▪ Minimise impacts on 'likely suitable' Plains-wanderer habitat as much as possible. ▪ Avoid land-use within 100 metres of expert-classified 'medium potential' Growling Grass Frog habitat, if feasible. ▪ Further refine turbine and infrastructure siting to avoid or minimise ecological impacts as identified from further assessments (ref **BI01**). ▪ Further refine turbine and infrastructure siting to avoid or minimise impacts to cultural heritage material and areas of cultural heritage sensitivity (ref **CH01 in Table 3**). ▪ Further refine turbine and infrastrucuture where required after intrusive geotechnical investigations are completed (ref **GT01** in Table 3) ▪ Further refine turbine and infrastructure siting to incorporate recommendations from independent technical assessments to refine (ref **SE01** in Table 3). ▪ If required, microsite turbines to avoid electro-magnetic interference (ref **EMI01** in Table 3)	Pre-approval; Construction	Proponent
Biodiversity			
BI01	**Undertake further studies** Undertake studies, as recommended, to confirm the existing conditions and fully understand potential impacts of the Project, to inform and refine the design development as far as practicable, including: ▪ Targeted surveys for listed flora species and ecological communities commencing in Spring 2026. ▪ Continuation of Bird Utilisation Surveys to complete two full years of seasonal bird surveys. ▪ Continuation of Bat surveys to complete two full years of echolocation insectivorous bat surveys. ▪ A second season of Brolga breeding surveys and an additional wetland assessment from July to December 2026. Targeted Raptor surveys during breeding season to identify the presence of active Black Falcon, Little Eagle and White-bellied Sea-eagle nests	Pre-approval Post-approval Construction	Proponent
BI02	**Native Vegetation and Offset Management Plan**	Pre-construction	Proponent

Measure ID	Pre-approval avoidance and minimisation measures	Phase	Responsibility
	Develop and implement a Native Vegetation and Offset Management Plan. The Plan may include the following requirements (or the like, to be developed through the approvals process): ▪ Prior to removal of native vegetation (excluding native vegetation removed as part of preparatory buildings and works), information about that native vegetation in accordance with the relevant requirements of the *Guidelines for removal, destruction or lopping of native vegetation* (DELWP, December 2017) (Guidelines) including an avoid and minimise statement, must be prepared to the satisfaction of the Secretary to the DEECA. For the avoidance of doubt, the information provided to the Secretary to the DEECA must include information about any native vegetation that has been, or is to be, removed. ▪ Prior to removal of native vegetation (excluding native vegetation removed as part of preparatory buildings and works), the biodiversity impacts from the removal of that native vegetation must be offset in accordance with the Guidelines, and evidence that the required offset(s) has been secured must be provided to the satisfaction of the Secretary to DEECA. ▪ In exceptional circumstances, the Secretary to DEECA may vary the timing for the provision of offsets. ▪ The secured offset(s) for the Project may be reconciled at the completion of the Project in accordance with the *Assessor's handbook – Applications to remove, destroy or lop native vegetation* (DELWP, October 2018).		

3.2 Mitigation measures – post-approval, construction, operation

Where it was not feasible to avoid a potential impact, or where a residual impact remains, mitigation measures are recommended and proposed to avoid or minimise impacts prior to and during Project construction, operation and decommissioning phases.

The Proponent has compiled a comprehensive set of proposed mitigation measures to effectively manage the potential impacts from the phases of the Project. The mitigation measures are described throughout the technical assessments, and summarised at Table 3, along with the associated Project phase the measure it applies to, and the responsible entity.

At this stage all mitigation measures are the responsibility of the Proponent, throughout the development of the EMF. Other entities involved in the Project may become responsible for discrete mitigation measures.

Alongside the EMF, the mitigation measures will be interrogated and updated throughout the development of the Project as design refinements and technical assessments continue. Through a process of continuous improvement, the Project will seek to amend a mitigation measure, if required for effectiveness.

Table 3 – Mitigation measures

Measure ID	Mitigation measure	Phase	Responsibility
Community and stakeholder engagement			
CS01	**Maintain a collaborative relationship with community and stakeholders** Develop, implement and maintain a Community and Stakeholder Engagement Plan, throughout the design, construction and operation of the Project.	All	Proponent
Environmental management			
EM01	**Environmental Management System** Develop, implement and maintain an Environmental Management System (EMS) for use throughout the design, construction and operation of the Project that conforms with AS/NZS ISO 14001:2016 Environmental management systems - Requirements with guidance for use.	All	Proponent
EM02	**Environmental Management Framework** Develop, implement and maintain an Environmental Management Framework (EMF) as described in this document and in any applicable conditions of planning consent.	All	Proponent
EM03	**Construction Environment Management Plan** Develop, implement and maintain a Construction Environment Management Plan (CEMP), and sub-plans as required, in line with industry standards. In particular, to avoid and reduce potential degradation of habitat, the CEMP will include: ▪ Native vegetation and tree protection zones ▪ Hygiene controls. ▪ Weed management plan. ▪ Dust control measures. ▪ Erosion and sediment control. ▪ Maintenance and monitoring schedules. ▪ The requirements and protocols for pre-clearance surveys of fauna habitat, including hollow-bearing trees and wetland habitat. ▪ Protocols in the event wildlife are found trapped, injured or dead, in accordance with the *Wildlife Act 1975*. ▪ Establish and maintain no-go zones around retained native vegetation and fauna habitat. ▪ Site inductions that address all of the above. ▪ A site plan will be prepared that clearly identifies the location of: – Access tracks – Washdown bays – Chemical storage – Refuelling – Waste storage	Pre-construction Construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	– Stockpiles – Native vegetation removal and retention – No-go zones. To reduce impacts to hydrological values, the CEMP will address: ▪ land stability and local waterway disturbance. ▪ distibutary protection. ▪ appropriate handing of possible contaminants.		
EM04	**Operation Environment Management Plan** Develop, implement and maintain an Operation Environment Management Plan (OEMP), and sub-plans as required, in line with industry standards.	Pre-operation Operation	Proponent
Biodiversity			
BI03	**Bat and Avifauna Management Plan** Develop and implement a Bat and Avifauna Management Plan (BAM Plan) in accordance with the Handbook and in conjunction with DEECA to ensure adaptive management is a core part of ongoing management. The BAM Plan will include: ▪ Detailed measures to minimise and mitigate the impacts of the Project on threatened fauna listed under the EPBC Act and the FFG Act. ▪ A description, based on informed understanding, of turbine collision risk to listed fauna that occurs on-site. ▪ A description, based on informed understanding, of how listed fauna use the site changes in response to wind farm construction and operation to be updated as operational monitoring becomes available. ▪ A operational monitoring program for the timely identification of turbine collisions and the timely collection and analysis of data. ▪ Clear triggers for management response, supported by a structured adaptive management framework that will include general and species-specific management strategies. ▪ Clear actions and timeframes to ensure the adaptive management framework is implemented in accordance with relevant approval and permit conditions and data from mortality monitoring, with clear corrective measures that escalate in line with the mitigation hierarchy. ▪ A program describing, the development and implementation of tangible, on-ground management actions to promote a long-term collision risk reduction on listed threatened and migratory bird and bat species if required.	Pre-operation Operation	Proponent
BI04	**Brolga Compensation Plan** In addition to pre-construction design iterations and if required, develop and implement a Brolga Compensation Plan in accordance with the Handbook and in conjunction with DEECA to ensure adaptive management is a core part of ongoing management.	Pre-construction	Proponent
BI05	**Construction mitigation** To mitigate impacts to native flora and fauna during construction: ▪ Establish appropriate vegetation protection zones around areas of native vegetation to be retained prior to works to prevent damage to native vegetation. ▪ Establish appropriate Tree Protection Zones (TPZs) around scattered native trees to be retained prior to works.	Pre-Construction Construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ Ensure all construction personnel are appropriately briefed prior to works, and that no construction personnel, machinery or equipment are placed inside vegetation zones/TPZs. ▪ Engage a suitably qualified zoologist to undertake a pre-clearance survey of trees to be removed during the week prior to removal to identify the presence of any nests or hollows. ▪ If considered necessary based on the results of the pre-clearance survey, engage a suitably qualified zoologist to be on-site during any tree removal works to capture and relocate any displaced fauna that may be present.		
BI06	**Rehabilitation of temporary disturbance areas** Temporary disturbance areas, such as those associated with the turbine laydown areas and construction compounds, will be rehabilitated as soon as possible following cessation of the disturbing activity. Subject to landowner consultation, the sites may be planted with appropriate locally indigenous species and may be monitored to control weeds. The CEMP will set out rehabilitation requirements.	Construction Operation	Proponent
BI07	**Habitat restoration** Following construction, habitats and habitat connectivity that has been removed or fragmented will be rehabilitated. Priority will be given to: ▪ Improvement of woodland patches that are, or can be made sufficiently large or contain suitable habitat features (e.g. hollow-bearing trees and coarse woody debris) to support threatened fauna, including breeding of bat species that are potentially present. ▪ Restoring habitat patches that are, or can be made, sufficiently large to support Plains-wanderer breeding, with a target patch size greater than 18 hectares, and focus on improving habitat quality and reinforcing linkages between remnant patches to support long-term persistence of the species.	Pre-operation Operation	Proponent
Cultural heritage			
CH01	**Cultural Heritage Management Plan** A Cultural Heritage Management Plan (CHMP) will be development and implemented alongside a suitably qualified heritage specialist and in consultation with First Peoples-State Relations and Traditional Custodians.	All	Proponent
Stormwater and surface water			
HD01	**Waterway disturbance minimisation and stormwater flow, volume and runoff management** A Stormwater / Surface Water Management Plan will be developed and implemented to: ▪ Maintain proposed buffers to waterways. ▪ Identify and select laydown areas to minimise disturbances. ▪ Establish a construction timeframe that aligns with weather and ground conditions that limit traffic disturbance from heavy machinery. ▪ Ensure construction-phase stormwater management reflects existing flow directions. ▪ E Design earthworks to ensure flow directions are the same in existing and developed conditions – Design of turbines can more easily reflect existing conditions as they have a small footprint – For Substations, BESS's, and Operational/Maintenance facilities, incorporate swales around pads / fill areas to maintain existing flow directions.	Pre-Construction Construction Operation	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	– Select laydown areas to minimise disturbances. ▪ Stormwater detention will be used to limit peak outflows for events up to and including the 1% AEP to those experienced in the existing condition. ▪ Peak flows at Substations, BESS's, and Operational/Maintenance facilities will be calculated for existing and developed conditions during detailed design, and an appropriate detention system designed. ▪ Adopt crushed rock surfaces for Substations, BESS's, and areas around Operational/Maintenance facilities to promote infiltration of stormwater. ▪ Stormwater Management Strategies (SWMS's) will be prepared for Substations, BESS's, and Operational/Maintenance facilities, and for BESS includes intercept dams to isolate runoff. ▪ Use green infrastructure to promote evaporation and infiltration, limiting runoff frequency and reducing stormwater volume in minor rainfall events. ▪ Landscaping around turbines and roadside swales can mitigate for turbines and roads owing to their (relatively) small footprints. ▪ Vegetated swales and detention ponds at Substations, BESS's, and Operational/Maintenance facilities will reduce runoff frequency for small rainfall events. ▪ If stormwater reuse demands exists (i.e. for toilet flushing at Operational/Maintenance facilities), consider including stormwater harvest as part of stormwater management design to provide additional stormwater quality treatment. ▪ Adopt appropriate construction methodologies to minimise sediment transfer. ▪ Establish a construction timeframe that aligns with weather and ground conditions that limit traffic disturbance from heavy machinery. ▪ Ensure an Environmental Management Plan (EMP) exists for all locations where chemicals or toxic substances may be stored or used on site.		
HD02	**Flooding** Develop and implement a Stormwater / Surface water Management Plan to: ▪ Undertake hydraulic modelling of construction phase conditions, and design of all assets to ensure no impact. ▪ Design turbines, BESS's, Substations, and Operations and Maintenance facilities to have 300mm of freeboard to Loddon 2011 flood levels. ▪ Assess BESS's, Substations, and Operations and Maintenance facilities for flood risk using modelling during detailed design to ensure appropriate freeboard to design levels is adopted. ▪ Assess construction laydown and areas of work relative to flood mapping to understand what sites are at risk. ▪ Align construction period with times of lower flood risk based on historical flood events and ensure construction program includes provisions for preparing construction sites within flood extents for inundation if Lower Loddon flooding is forecast. ▪ When flooding is forecast, ensure operational check and assessment of infrastructure prior to inundation. ▪ Peak Loddon 2011 flood water velocities will be determined for all structures (including temporary buildings associated with construction) to ensure that structures within the flood extent can withstand the design velocities. ▪ Earthworks (batter slopes) that raise areas to provide freeboard will be assessed for wave action and provided with erosion protection such as rock beaching.	Pre-Construction Construction Operation	Proponent
HD03	**Water quality** Develop and implement a Stormwater / Surface water Management Plan to: ▪ Select laydown areas to minimise disturbances.	Pre-Construction Construction Operation	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ Establish a construction timeframe that aligns with low flooding risks, weather and ground conditions that limit traffic disturbance from heavy machinery. ▪ Adopt best practice sediment control measures and control of possible contaminants during construction. ▪ Incorporate passive stormwater quality treatment into the design of drainage infrastructure, and intercept dams into BESS and substation to allow stormwater management in isolation. ▪ Utilise vegetated swales to direct stormwater (instead of underground drains) where possible. ▪ Ensure SWMS for BESS's, Substations, and Operations and Maintenance facilities prepare SWMS's that document stormwater quality treatment provided. ▪ Adopt crushed rock surfaces for Substations, BESS's, and areas around Operational/Maintenance facilities to promote infiltration of stormwater. ▪ Ensure safe work practices and appropriate handling of possible contaminants. ▪ Educate staff regarding correct disposal methods. ▪ Protect storage areas with bunding and appropriate design with freeboard to Loddon 2011 flood levels		
Landscape and visual			
LV01	**Offsite landscape screening** Installation of soft landscape works (tree and shrub planting) will be offered to non-involved dwellings within 7.5km of a turbine where the Project would result in Moderate - High to High visual effects. Landscape works will aim to filter or screen views toward turbines. The landscaping works will consider any zone and/or overlay planning requirements (including requirements of any Bushfire Management Overlay where applicable). The implementation of landscaping works will be based on a reasonable and feasible approach to provide substantive screening of a turbine, and to offer property owners the opportunity to opt in, or out of landscaping mitigation works to cater for individual visual mitigation preferences. Off-site landscape works will be facilitated through an off-site landscaping program, which will be prepared as part of the EMF. The off-site landscaping program will: ▪ Include a methodology for determining: – The type of landscaping treatments to be proposed. – A timetable for establishing and maintaining the landscaping for at least two years. ▪ Include a process for making offers to affected landowners to undertake landscaping on the landowner's land. ▪ Include a process for recording: – Offers that have been made to landowners. – Whether or not the offers are accepted. – When and how offers are actioned following acceptance. – Include a process for the preparation and provision of progress reports regarding the implementation of the off-site landscaping program to be provided to the responsible authority. The off-site landscaping program: ▪ Will be implemented to the satisfaction of the responsible authority	Pre-Construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ Will not be altered or modified without the written consent of the responsible authority.		
LV02	**On-site Landscaping Plan** An On-site Landscaping Plan will be developed to screen substations, buildings and lower infrastructure, as well as BESS facilities and associated substations. This Plan would include details of plant species to be used, and a maintenance and monitoring program.	Pre-Construction	Proponent
LV03	**Infrastructure design and materials** Electrical infrastructure, and associated buildings and structures will have non-reflecting surface finishes and appropriate colour finishes that considers the existing visual backdrops.	Pre-Construction	Proponent
LV04	**Lighting** Permanent project lighting associated with the O&M facility and terminal station, BESS facilities and associated substations and temporary lighting associated with construction areas will be installed in accordance with Australian Standard *AS 4282: Control of the obtrusive effects of outdoor lighting*. These measures include: ▪ ensuring lighting is baffled and directed to the ground. ▪ installing motion-trigger mechanisms to reduce the duration of lighting. ▪ installing perimeter landscaping to intervene in views to lighting from identified sensitive receptors (residential dwellings).	Pre-construction Construction Operation	Proponent
LV05	**Non-reflective coating** All wind turbine blades must be coated with a non-reflective finish to avoid possible effects of blade glint on surround dwellings in accordance with the Victorian Department of Transport and Planning (DTP) *Policy and Planning Guidelines for the Development of Wind Energy Facilities in Victoria*, and to the satisfaction of the responsible authority.	Pre-Construction	Proponent
Geotechnical			
GT01	**Intrusive geotechnical investigation** Undertake studies, as required, to fully understand the existing conditions and potential impacts of the Project, to inform the design development as far as practicable, including: ▪ Borehole, test pit and Cone Penetration Testing (CPT) at each of the proposed turbine locations. ▪ Additional boreholes at substation and BESS sites. ▪ Additional test pits along the alignment of access roads. ▪ Soil thermal resistivity at substation sites and along accessways where cabling is proposed. ▪ An assessment of the possibility of liquefication using CPT results. ▪ Soil testing, including of shrink– swell properties.	Pre-Construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
Traffic and transport			
TR01	**Traffic Management Plan** Prepare and implement a Traffic Management Plan (TMP) in accordance with Australian Standard 1742.3 and the Work Health and Safety Regulation 2017. The TMP will provide additional information regarding the traffic volumes and distribution of construction vehicles including: ▪ Road transport volumes, distribution and vehicle types broken down into: – Hours and days of construction. – Schedule for phasing/staging of the Project. ▪ The origin, destination and routes for: – Employee and contractor light vehicles. – Heavy vehicles. – OSOM vehicles. ▪ A map of the primary haulage routes highlighting critical locations. ▪ An induction process for vehicle operators and regular toolbox meetings. ▪ A complaint resolution and disciplinary procedure. ▪ Local climatic conditions that may impact road safety of employees throughout all Project phases (e.g. fog, wet and significant dry, dusty weather). The TMP will also provide information related to: ▪ Information and communication. ▪ Signage. ▪ On-site mitigation measures. ▪ Shuttle busses. ▪ Driver protocols. ▪ OSOM vehicle protocols. ▪ Road upgrades (refer **TR02** and **TR03**).	Pre-construction Construction Operation	Proponent
TR02	**Local road network management** Undertake upgrades to local road network as identified in the Preliminary Traffic Impact Assessment, or any assessment which supersedes the requirements. This may include: ▪ All weather surface upgrades. ▪ Road widening as required. ▪ Intersection upgrades, vegetation removal or provision of hardstand.	Pre-construction	Proponent
TR03	**OSOM route management** Obtain approvals as required and undertake works in coordination with road owners and managers, in line with the Route Assessment and Preliminary Traffic Impact Assessment, or any assessment which supersedes the requirements.	Pre-construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
Air quality			
AQ01	**Dust Management Plan** A Dust Management Plan (DMP) will be developed, including the following general mitigation measures: ▪ Training will be provided to all Project personnel, including relevant sub-contractors on sound air quality control practices and the requirements of the DMP through inductions, toolboxes and targeted training. ▪ Air quality control measures will be included in relevant Environmental Work Method Statements and/or Erosion and Sediment Control Plans. ▪ Vegetation clearing will be staged where possible to minimise the area and time that surfaces are exposed. ▪ Exposed surfaces with no scheduled work for medium to long term will be treated to minimise dust generation. Exposed surfaces will be stabilised progressively using the most practicable site-specific methods, including watering and geo-fabrics for short term exposure and emulation spray, spray grass, soil compaction and revegetation for longer term exposed areas or final finishes. ▪ Construction activities will be modified, reduced or controlled during high or unfavourable wind conditions or high background levels, if they have a potential to increase dust generation that may impact sensitive receptors. ▪ Control measures including water carts, sprinklers, sprays, dust screens or the application of geo-binding agents will be utilised, where applicable, to control dust emissions. The frequency of use will be modified to accommodate prevailing conditions. ▪ Erosion control structures will be checked regularly for build-up of silt and other materials to ensure deposits do not become a dust source. ▪ Stockpiles will be located as far from sensitive receptors as possible. A suitable cover crop or provision of other covering over topsoil stockpiles will be established where stockpiles prone to wind erosion are in place for the medium and long term. ▪ There will be no burning off of waste. ▪ Stormwater, recycled water or other water sources shall be used, where feasible and reasonable, in preference to potable water for construction activities, including concrete mixing and dust control. ▪ Maintain dust control equipment on the concrete batching plant/s to ensure its operability. ▪ The application of pesticides, for the purposes of the Project, will be modified, reduced or controlled during high or unfavourable wind conditions where wind can carry pesticides outside of the defined treatment area. ▪ Temporary concrete batching plants are to be located greater than 300 metres from sensitive receptors. ▪ Construction of turbines are to be located greater than 50 metres from Ramsar wetland, noting that the Project has committed to maintain a buffer of at least 2 kilometres between the Ramsar wetlands and proposed turbines. The following vehicle movement and material stockpiling measures will be included: ▪ Areas of disturbed material and access roads will be stabilised where possible by methods such as compaction. ▪ Measures will be implemented to minimise dust, soil or mud from being deposited from vehicles on public roads. This will be achieved by implementing mitigation measures such as rumble grids and large aggregate at entry/exit points. Manual cleaning will also be carried out where appropriate. In the event of any spillage or tracking onto public roads, the spilt material will be removed immediately or when known. ▪ Vehicle movement will be confined to designated haul roads and areas. These roads will have speed limits in place to reduce dust generation. Further reduced speed limits may need to be implemented where dust generation persists. ▪ Water carts will be used to supress dust on haul roads as required. Construction plant, vehicles and machinery will be maintained in accordance with manufacturer's specifications to ensure that emissions are not excessive. Periodic visual checks will be undertaken to ensure ongoing compliance, typically weekly. If visible	Pre-construction Construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	smoke emissions are detected from plant and equipment, the plant and equipment will be tagged out of service until such time as it has been inspected by a mechanic and either repaired, maintained, or shown to be compliant with manufacturer specifications.		
Noise			
NO01	**Pre Construction Noise Assessment** A Pre Construction Noise Assessment will be prepared as required by the applicable Noise Assessment and approval conditions.	Pre-construction	Proponent
NO02	**Construction Noise Management Plan** A Construction Noise Management Plan will be developed as required by the applicable Noise Assessment and approval conditions.	Pre-construction Construction	Proponent
NO03	**Post Construction Noise Assessment** A Post Construction Noise Assessment will be developed as required by the applicable Noise Assessment and approval conditions.	Construction Operation	Proponent
NO04	**Noise Management Plan** A Noise Management Plan will be developed as required by the applicable Noise Assessment and approval conditions.	Operation	Proponent
Agriculture			
AG01	**Ongoing engagement** Effective landholder liaison will be maintained during construction, operation and rehabilitation phases to minimise disruption and disturbance, including to: ▪ Identify restriction zones required to ensure construction (and operation) minimises disturbance on farming operations and irrigation infrastructure, in particular high value production areas, as far as practicable. ▪ Include opportunities for adjustment of paddock layouts and/or irrigation infrastructure to enable irrigation to continue around the proposed construction footprint. ▪ Identify required notice periods for construction commencement and duration to enable landholders to make decisions to avoid or minimize production losses. ▪ Confirm and follow biosecurity protocols.	Construction Operation Decommissioning	Proponent
Aviation			
AV01	**Engagement with relevant authorities and aircraft users** To avoid potential for aircraft collision with turbines, harsh manoeuvring leading to controlled flight into terrain and effects of the Project on operating crews: ▪ Provide details of the Project to local and regional aircraft operators prior to construction to heighten their awareness of its location and so that they can plan their operations accordingly. Specifically: – Airservices Australia – must be notified of the final layout, including the location and height of all turbines to be noted on aeronautical maps and charts, and to publish details of the Project in ERSA for surrounding aerodromes. – Civil Aviation Safety Authority – must be notified of the final layout and turbine heights. – Local and regional aerodromes and aircraft operators – will be engaged with to provide additional safety	Pre-construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	– Local aerial agricultural and aerial firefighting operators – will be engaged to develop procedures, for example, stopping the rotation of the turbine blades prior to the commencement of subject aircraft operations within the Project Area.		
AV02	**Lighting on meteorological masts** Meteorological masts installed prior to turbine installation and those that are not in relatively close proximity to a turbine will be lit to ensure they are visible in low light and deteriorating atmospheric conditions.	Construction	Proponent
AV03	**Lighting on turbines** The Aviation Impact Assessment concluded that lighting for turbines or permanent meteorological masts is not required to provide an acceptable level of safety. If aviation lighting is determined to be required by CASA or the planning authority, a number of mitigation measures to reduce impacts on avifauna and bats and surrounding neighbours can be implemented, including: ▪ Reducing the number of turbines with obstacle lights. ▪ Specifying an obstacle light that minimises light intensity at ground level. ▪ Specifying an obstacle light that matches light intensity to meteorological visibility. ▪ Mitigating light glare from obstacle lighting through measures such as baffling. ▪ To the extent possible, designed to avoid attracting avifauna and bats into the rotor-swept area.	Operation	Proponent
Electromagnetic Interference (EMI)			
EMI01	**Micro-siting (EMI)** If required following final turbine selection or refinements to the layout or other Project assumptions occur, micro-siting of turbines may be required, depending on the nature of the effected service, including: ▪ Adjustment of turbine micro-siting to increase separation from affected signal paths where practicable. ▪ Selection of turbine tower, nacelle and blade materials and finishes that minimise reflective or scattering effects, where available within manufacturer specifications. ▪ Replacement or modification of affected radiocommunications equipment with alternative technologies less susceptible to interference (e.g. increase signal strength, add a relay point). ▪ Relocation of impacted transmitter or receiver equipment to an alternative existing site, or to a new purpose-built site where required (noting that such infrastructure may also support wind farm operational communications). ▪ Use of underground or overhead optical fibre in place of radiocommunications links, where feasible, thereby eliminating EMI risk. ▪ Installation of enhanced filtering or signal processing equipment to mitigate spurious reflections or Doppler effects associated with wind turbine operation.	Pre-construction	Proponent
EMI02	**Adaptive management (EMI)** Where EMI effects cannot be fully quantified prior to construction, additional mitigation measures may be implemented, if required, including: ▪ Baseline signal testing prior to construction to characterise existing service performance where relevant. ▪ Post-construction monitoring and validation to confirm actual operational impacts. ▪ Implementation of retrofit measures where required, which may include:	Pre-construction Construction Operation	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	– Re-orientation or optimisation of receiving antennas. – Installation of higher-gain or more directional antennas. – Relocation of antennas to less affected positions. – Installation of amplifiers or signal conditioning equipment. – Provision of alternative broadcast solutions (e.g. digital TV translators or satellite services).		
Social and Economic			
SE01	**Recommendations from technical assessments** The Project will incorporate recommendations from independent technical assessments to refine Project design and implementation, including: ▪ Incorporating relevant recommendations from independent technical assessments into detailed Project design, construction planning and operational management, with particular attention to matters that are socially material to affected stakeholders, including landscape and visual amenity, workforce and accommodation, roads and traffic, Aboriginal cultural heritage, and noise and operational amenity. ▪ Documenting how technical findings have informed siting, layout refinement, access arrangements, construction methods and mitigation commitments, and communicating those outcomes in clear, accessible language to affected stakeholders. ▪ Developing property-specific or stakeholder-specific management measures where impacts require site-specific responses, rather than relying only on Project-wide commitments. This recommendation supports improved understanding, trust and perceived fairness in project decision-making.	All	Proponent
SE02	**Benefit sharing** Implement benefit sharing commitments through a transparent and equitable framework. ▪ Implement benefit sharing commitments through a clear, transparent and equitable framework that responds to the distribution of both benefits and impacts across the social locality. The framework will set out guiding principles, eligibility, governance arrangements, decision-making processes and reporting requirements for the Annual Energy Offset and Community Benefit Fund and any other benefit-sharing initiatives. ▪ The framework will include a clear pathway for near neighbours and other directly affected non-host landholders, recognising that perceptions of fairness are likely to influence trust, social licence and community cohesion. ▪ Continue co-design of benefit sharing measures with relevant stakeholders, and where relevant, support and align activities with local council economic development plans, such as the “Gannawarra Economic Development Strategy 2019-2024” and the “Loddon Shire Economic Development Strategy 2025-2029.” ▪ Report publicly on the allocation of funding, local employment outcomes, local procurement outcomes, training participation and other realised social benefits. This recommendation is intended to strengthen the positive impacts associated with regional economic participation while reducing risks of perceived inequity or exclusion.	All	Proponent
SE03	**Workforce Accommodation Management Plan** Prepare and implement a Workforce Accommodation Management Plan before Project construction. ▪ Prepare and implement a Workforce Accommodation Management Plan prior to construction mobilisation. The plan will ensure safe, sufficient and affordable accommodation for the Project’s construction workforce while minimising disruption to the local housing market and tourism capacity and enhancing local economic activity.	Pre-construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ Co-design plan with key stakeholders, for example the Gannawarra and Loddon Shire Councils, tourism associations, and accommodation providers to refine accommodation arrangements and manage cumulative regional pressures. Engagement will occur early enough to influence procurement and workforce mobilisation decisions. ▪ The Plan will set out the proposed accommodation model, expected workforce numbers over time, workforce source regions, accommodation demand by project phase, and the measures that will be used to avoid or minimise impacts on local housing availability, affordability, tourism accommodation and community wellbeing. ▪ As an alternative to building a temporary construction accommodation facility for this Project within the Project Area, continue to explore other options such as negotiating arrangements with existing commercial accommodation providers or partnering with Council to build legacy housing. The Plan will avoid material reliance on private rental stock and set a clear cap or threshold for contractor use of private rentals, to reduce risks of crowding out local residents and key workers. ▪ The Plan will establish practical controls such as caps on contractor use of private rental housing, booking protocols for accommodation providers, and early response triggers linked to indicators such as rent escalation, declining vacancy, displacement from short-stay accommodation, or increased demand for homelessness and emergency housing services. Where triggers are exceeded, implement additional mitigation, for example securing extra dedicated rooms, pausing further bookings in local rentals, or revising roster timing to smooth peak demand. Regularly monitor and report during construction against those indicators, with results shared internally and summarised publicly where appropriate. ▪ Prioritise hiring locally (within a 60-minute drive of the site) to reduce pressure on local accommodation and housing requirements. Where practicable, focus on individuals with relevant skillsets or straightforward upskilling needs who already live in the area. This should be linked to realistic local capability assessments and staged workforce planning (refer to Recommendation 4 to develop a Local Content Plan and appropriate targets for local procurement). ▪ Coordinate with other nearby major energy projects to minimise cumulative impacts, as construction stage requirements with these project timelines may overlap. Engage early with the proposed contractors for engineering, procurement and construction to plan across projects to enhance local employment. Share workforce and accommodation requirement forecasts to avoid concurrent peaks. ▪ Consult with housing providers and community services, for example Mallee Family Care, Bendigo Health Carers Support and Salvation Army Housing, that support vulnerable groups like seniors, and low-income renters. Monitor early warning indicators like rent escalation and displacement from short-stay accommodation. Include a simple escalation protocol with Council, housing providers and community services if housing stress indicators worsen. Consider mitigation measures including rental support partnerships, and caps on private rental uptake by contractors.		
SE04	**Local Content plan** Prepare and implement a Local Content Plan and set local procurement and workforce participation targets based on identifiable regional capability. ▪ Prepare and implement a Local Content Plan prior to construction, setting realistic targets for local employment, local procurement and training participation, informed by identifiable regional capability and supply constraints. ▪ Identify work packages suitable for local and regional businesses and publish procurement pathways early enough to allow businesses to prepare, including through supplier briefings, ICN Victoria listings and tender-readiness support. ▪ Prioritise local and regional workforce participation (particularly workers living within a reasonable commuting distance of the Project) where it does not worsen labour shortages in essential sectors, to strengthen local benefit and reduce unnecessary accommodation demand. ▪ Consider offering training/upskilling in energy sector construction industries for residents living in the Gannawarra, Loddon and surrounding LGAs to further increase local capability. This could be done in partnership with other projects and local institutions (e.g. with VIC TAFEs and La Trobe University).	Pre-construction	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ The plan will account for the benefit to local business of the temporary population increase during construction, especially local accommodation providers. This Project could be seen as an opportunity to showcase regional lifestyle, liveability, tourism and economic opportunities for those working on the projects to improve longer term local skills retention. The local spend possibilities resulting from temporary workforce increases during construction stage will not be underestimated. ▪ The plan could incorporate a deliberate workforce diversity focus that opens meaningful employment pathways for local businesses and workers, such as youth, apprentices/trainees, Aboriginal businesses and workers, people transitioning from or other regional projects, and women in construction and support roles. Note that diversity includes skills, industries, and training pipelines as well as demography. This will be balanced with measures to manage potential downsides, such as competition for a limited pool of skilled labour, ensuring the Project strengthens rather than strains the local workforce. ▪ Mindful of cumulative labour competition, the Plan could include rolling six-month and twelve-week workforce and procurement forecasts that are shared with Councils and relevant industry groups. Coordinate with other major regional projects and time measures to reduce avoidable overlap with agricultural peaks and local service demand. ▪ Monitor and report on implementation of the Plan during construction, including performance against local employment, supplier participation, training and workforce diversity indicators, and use this reporting to adapt measures where local benefit is not being realised as intended. Other indicators could include: percentage of local/regional labour; value and number of contracts awarded locally; participation by different groups; unresolved barriers raised by local suppliers; and stakeholder perceptions of whether benefits are fair and visible.		
SE05	**Community and stakeholder engagement plan** Continue consultation with key stakeholder groups and regularly review strategy and implementation of the Community Engagement Plan throughout the life of the Project. ▪ Maintain inclusive and responsive engagement with key stakeholder groups throughout the life of the Project and regularly review and update the Community and Stakeholder Engagement Plan to reflect emerging issues, stakeholder feedback, and changing project stages. ▪ Provide regular, accessible consultation and feedback opportunities at key project milestones, with clear pathways for stakeholders to influence project decisions, mitigation measures, and management responses. ▪ Prioritise ongoing engagement with project neighbours and the near community about potential impacts, proposed mitigations, construction activities, and timing, to address misinformation, reduce uncertainty, and minimise disruption to agricultural operations and other nearby land uses. ▪ Continue engagement with First Nations representatives to ensure cultural heritage is protected, project benefits are realised, and concerns are appropriately heard and addressed. This will include building on the CHMP process and supporting meaningful employment opportunities for local First Nations people. ▪ Work with local councils, authorities, service providers, and regional stakeholders to identify, monitor, and respond to increased demand on infrastructure and services during construction, including in health, education, childcare, housing, and transport. ▪ Consider a contribution and partnership model to support local services and infrastructure where project demand may create temporary pressure during construction. This may include contributions to road maintenance and upgrades, and targeted support for health, education, and childcare services. ▪ Support local and regional businesses, suppliers, and service providers to be procurement-ready and able to participate in project delivery. This will include early communication of opportunities, practical capability-building support, and coordination with local industry to strengthen regional supply chain capacity and share project benefits locally. ▪ Coordinate project planning and workforce management with local service providers, major regional events, agricultural production cycles, and tourism peaks and troughs, to reduce avoidable pressure on local communities and services during construction and operations.	All	Proponent

Measure ID	Mitigation measure	Phase	Responsibility
	▪ Ensure the Community and Stakeholder Engagement Plan clearly communicates key project activities, likely impacts, mitigation measures, and management actions across all project stages, using a mix of communication channels suited to different stakeholder groups. ▪ Maintain a well-publicised, accessible, and responsive complaints management process for neighbours and the broader community, and provide timely project updates to address misinformation, resolve concerns early, and reduce potential impacts on community cohesion and wellbeing. ▪ Prepare and maintain a targeted communications package for the impact themes that are most likely to drive ongoing concern, uncertainty or misinformation, particularly: landscape and visual amenity; workforce accommodation and housing; roads and traffic; noise and operational amenity; telecommunications and access to local services; land values and insurance; waste and decommissioning; and fire and other hazards. ▪ Target communications could include plain-English fact sheets, FAQs, property or locality-specific information where relevant, clear explanation of what is known and not yet known, how technical assessment findings relate to lived experience, and how stakeholder feedback has influenced project design, mitigation or management. ▪ Communications will be timed to key project milestones and delivered through channels suited to affected stakeholders, including direct neighbour briefings, newsletters, the project website, and one-on-one follow-up where concerns are specific or persistent.		

4. Change management

The turbine layout and construction footprint, used to assess impacts of the Project, for the purpose of the EES referral, is a concept level design, anticipated to provide a conservative and realistic understanding of the impacts of the Project.

The final design and construction footprint will be refined throughout the environmental assessment, planning approval and detailed design process. The final impact area for the Project will comply with the planning approval requirements and mitigation measures as outlined above.

In the event that, following approval, detailed design requires amendment to the turbine layout or construction footprint, a change management process shall be followed. The change management process is proposed to ensure that compliance with the approval requirements and mitigations measures is achieved in the event that changes are required.

Table 3 sets out the proposed change management procedure, which will be confirmed through the planning approval process. This is also represented visually in Figure 2.

Table 3 – Proposed change management process summary

Change location	Proposed process summary
Within construction footprint	▪ Change proposed by Proponent or contractor. ▪ Change to be incorporated into amended plans for consent. Updated plan to include the proposed location of the change. ▪ Approval of the amended plan/s to be sought from the Minister for Planning. If approval is provided in writing, the change can then be implemented.
Within Project Area – no material adverse increase in impacts	▪ Change proposed by Proponent or contractor. ▪ Change to be incorporated into amended plans for consent. Updated plan to include the proposed location of the change. ▪ Report to be prepared with the reasons for the change, and supporting evidence to demonstrate that the change will not give rise to any material adverse increase in impacts compared to the location within the construction footprint. ▪ Approval of the amended plan/s to be sought from the Minister for Planning. If approval is provided in writing, the change can then be implemented.
Within Project Area – material adverse increase in impacts	▪ Change proposed by Proponent or contractor. ▪ Discussions to be held with relevant agencies, DTP and/or the Minister for Planning to confirm relevant environmental impact assessment and approvals process under the P&E Act and other applicable legislation. ▪ Required approvals to be sought. If approvals are provided, the change can be implemented.

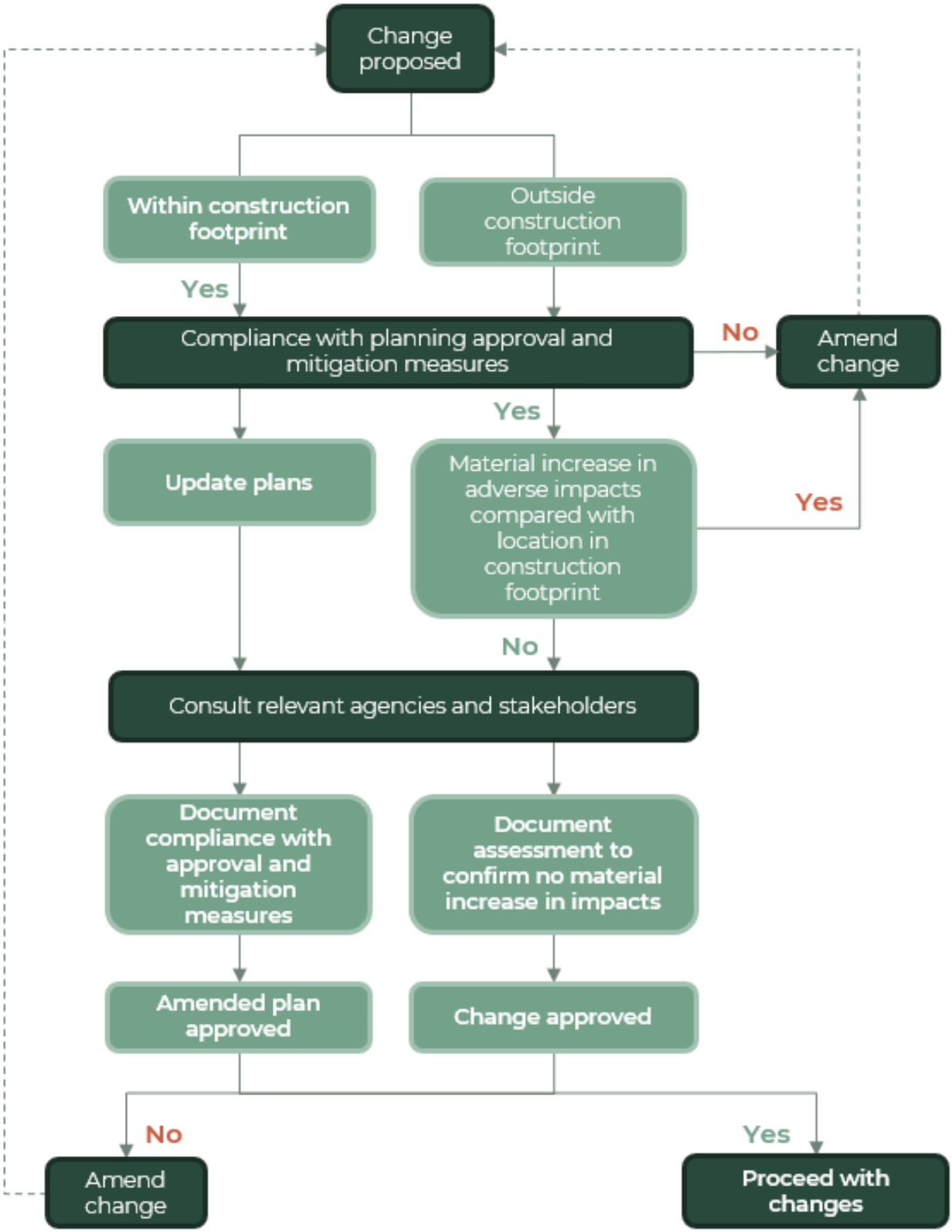

Figure 2 – Proposed change management process flowchart

5. Evaluating performance and compliance

Compliance with the EMF, mitigation measures and project approvals will be monitored, audited and reported on. The Proponent and contractors will have responsibilities to evaluate compliance during design development, construction, operation and decommissioning.

The evaluation of compliance will consider:

- Compliance with the requirements of the EMF, project approvals and key plans including the CEMP and OEMP.
- Effectiveness of mitigation measures to achieve avoidance and minimisation of impacts, considering types of mitigation measures, how widely they are used in environmental management, the complexity of the mitigation measures and the level of uncertainty about the effectiveness of the measures.
- How corrective actions have been applies after an incident or non-conformance with the EMF and mitigation measure, and any improvements implemented as a result.
- Records and monitoring to demonstrate that mitigation measures and project approvals are met during delivery of the Project.

The EMS will outline the process for monitoring compliance with project approvals, mitigation measures and for continual improvement. The process for continual improvement will consider available information such as contractor reporting, auditing, monitoring results, incidental management, complaints received and how they were resolved.

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