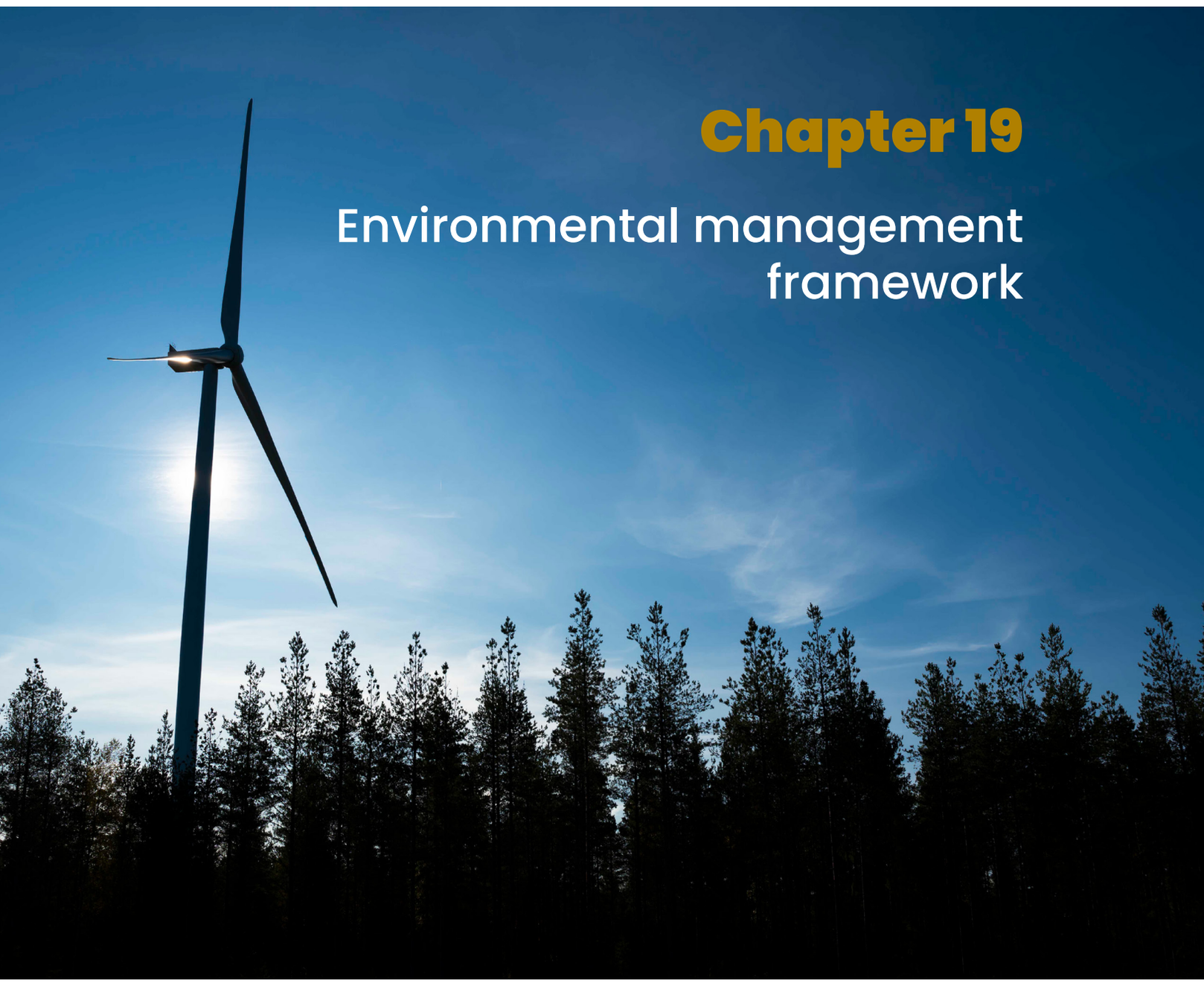

Chapter 19

Environmental management framework

Acknowledgement of Country

Neoen Australia acknowledges the traditional custodians of the land in which we live, and pays its respects to their elders, past and present. The Gunditjmara are the original custodians of the Country on which the Project is located and we acknowledge them as the original custodians. We are committed to Aboriginal engagement and reconciliation and aim to bring Aboriginal and Torres Strait Islander people, local communities and the councils along for the journey to strengthen relationships and enhance local community outcomes.

Disclaimer

19 Environmental management framework

19.1 Introduction

This Environmental Management Framework (EMF) has been developed to provide a transparent and consistent framework for managing environmental risk and mitigating adverse effects of the Kentbruck Green Power Hub (the Project). Development of this EMF was guided by the *Scoping Requirements for Kentbruck Green Power Hub Environment Effects Statement* (Scoping Requirements), as described in **Section 19.1.1**, and relevant legislation, policy and guidelines including the statutory approvals and consents that will be required for the Project.

The EMF outlines clear accountabilities for the delivery of the Project in accordance with the mitigation measures (MMs) and compliance with relevant environmental laws, approvals, approval conditions, environmental management plans (EMPs) and procedures. Successfully implemented, the EMF will ensure that the environmental risks and potential impacts of the Project are effectively managed.

Each technical assessment prepared for this Environment Effects Statement (EES) provides recommendations for appropriate MMs to be adopted by the Project. The measures proposed to be adopted by the Project are detailed in **Chapters 7–18 of** this EES and have informed preparation of this EMF.

The EMF also outlines the procedures to be followed for the preparation, review, approval and implementation of environmental management plans and procedures. It provides for the regular review and updating of these plans and procedures, as well as independent monitoring, auditing, and reporting of compliance. The roles and responsibilities of key stakeholders are defined to ensure that there are clear accountabilities for the implementation of environmental management requirements for the Project.

19.1.1 EES scoping requirements

This chapter responds to Section 3.7 of the Scoping Requirements, which requires that an EMF be prepared as part of the EES documentation to provide a transparent framework with clear accountabilities for managing and monitoring the environmental effects and hazards associated with the construction and operational phases of the Project.

The Scoping Requirements specify that the EMF will describe baseline environmental conditions to allow evaluation of the residual environmental effects of the Project, as well as the efficacy of applied environmental management and contingency measures. The entity responsible for approval of management/environmental plans will also be identified. These two requirements are addressed in **Section 19.3** and **Section 19.4.1**, respectively.

In accordance with Section 3.7 of the Scoping Requirements, the EMF described in this chapter includes the following:

- The context of required approvals and consents (see **Section 19.2**)
- The proposed environmental management system (EMS) to be adopted (**Section 19.6**)
- Organisational responsibilities and accountabilities for environmental management (**Section 19.3**)
- An environmental risk register to be maintained during Project implementation (**Section 19.4**)
- The environmental management measures proposed in the EES (Chapters 7-18) to address specific issues, including commitments to mitigate adverse effects and enhance environmental outcomes (see **Section 19.4**).

An important aspect of the EMF is ongoing community consultation, stakeholder engagement and communications during construction and operation of the Project. The EMF also sets the procedures for the following:

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

Neoen Australia Pty Ltd (The Proponent) has prepared a Community and Stakeholder Engagement Plan (CSEP) which details the stakeholders relevant to the Project and how the Proponent has and will continue to engage with each stakeholder throughout the Project's lifetime. The CSEP sets out the strategy and procedure for identifying and engaging with stakeholders, enabling matters raised to be considered and addressed as appropriate, to ensure interests and concerns are adequately reflected in the final design and operational approach of the Project and regulatory compliance requirements for stakeholder consultation are met. The EMF requires that the CSEP be kept up-to-date throughout the Project's lifetime. Further information about the Proponent's engagement approach and activities is provided in **Chapter 6 Community and stakeholder engagement.**

Section 19.4 of this EMF lists the mitigation measures proposed in earlier chapters of the EES (**Chapters 7–18**) to address specific issues. Each of the relevant management plans will describe the proposed objectives, indicators, and monitoring requirements to manage and address the Scoping Requirements.

19.2 Statutory approvals and consents

An overview of the statutory approvals and consents required for the Project is provided in **Table 19.1**. Detailed information on the assessment framework is provided in **Chapter 5 *Assessment and approvals framework***. All necessary consents will be obtained at the appropriate project phase and in accordance with the requisite legislation.

Table 19.1: Statutory approvals and consents required for the Project

Act	Statutory approval	Approval authority	Relevance to EMF
Primary Approvals			
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	EPBC Act approval	Commonwealth Minister for the Environment and Water	Approval under the EPBC Act will set out conditions for the Project to comply with, which will be included in the relevant management plans and sub-plans prepared for the Project.
Planning and Environment Act 1987 (P&E Act)	Planning Scheme Amendment (Specific Controls Overlay and Incorporated Document) to the Glenelg Planning Scheme (the Planning Scheme)	Victorian Minister for Planning (the Minister)	The Planning Scheme Amendment (PSA), if approved by the Minister, will introduce a Specific Controls Overlay into the Planning Scheme, and give effect to an Incorporated Document.
Aboriginal Heritage Act 2006 (AH Act)	Cultural Heritage Management Plan (CHMP)	Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC)	An approved CHMP will include conditions to manage impacts of the Project and protect Aboriginal cultural heritage. This will be implemented for the construction phase of the Project and referenced in sub plans required by the EMF.
Mineral Resources (Sustainable Development) Act 1990 (MRSD Act)	Quarry Work Plan	Department Head, DEECA	The Quarry Work Plan will detail construction and operational requirements of Earth Resources Regulation Victoria (DEECA). This plan sits outside of the conditions of the Incorporated Document and is prepared by the Proponent to operate in conjunction with the approved management plans.
National Parks Act 1975 (NP Act)	Consent to allow for construction and operation of the transmission line within Cobboboonee National Park	Parks Victoria	The Project is seeking consent from Parks Victoria under section 27 of the NP Act for the development and operation of the portion of the transmission line to which this act applies. This consent application will be prepared on the basis that the relevant mitigation measures outlined in this EMF will apply to the development of the transmission line and will be reflected in the consent (along with any other conditions imposed by Parks Victoria).
Forests Act 1958	Licence to allow for construction and operation of the transmission line within Cobboboonee Forest Park	Victorian Minister for Environment and Climate Action	The Project is seeking a licence under the *Forests Act 1958* for a portion of the transmission line corresponding with land to which this act applies.

Act	Statutory approval	Approval authority	Relevance to EMF
Secondary Approvals			
Flora and Fauna Guarantee Act 1988 (FFG Act)	Permit to take FFG listed flora	Secretary, DEECA	Measures to manage impacts on species listed under the FFG Act are detailed in management plans and sub-plans in the EMF and are also included in the conditions of the Incorporated Document.
Wildlife Act 1975	Permit required to remove, salvage, capture or relocate fauna	Secretary, DEECA	Fauna management sub-plans are identified in this EMF and are also included in the Incorporated Document plans and sub-plans.
Water Act 1989	• Permit for the taking or use of water from a waterway or groundwater from bores • Permit to undertake works on a waterway or to a bore	Victorian Minister for Water	Procedures and measures for limiting impacts on waterways are contained within the plans and associated management sub-plans described in the EMF.
Road Management Act 2004	Consents to conduct works in, on, or under roads.	Head, Transport for Victoria for Portland-Nelson Road, Bridgewater Road, Madeira Packet Road and Henty Highway DEECA (formerly DELWP) for Boiler Swamp Road Glenelg Shire Council for all other roads.	Operation on these nominated roads and management of traffic is included in a Traffic Management Plan nominated in this EMF.

The *Environment Protection Act 2017* (EP Act) came into effect in July 2021. The EP Act includes a general environmental duty that applies to all Victorians. The general environmental duty (GED) is a statutory obligation under the EP Act. The approach described in this EMF has been prepared to address this requirement and to ensure environmental management of the Project is undertaken in a manner which is consistent with the GED.

19.2.1 Incorporated document

Delivery of the Project would be facilitated primarily by the insertion of an Incorporated Document into the Glenelg Planning Scheme through a planning scheme amendment. The purpose of the Incorporated Document is to facilitate the use and development of the Project which includes a wind energy facility and utility installation (transmission line) on land shown as Specific Controls Overlay (SCO10) of the Planning Scheme and is made pursuant to section 6(2)(j) of the P&E Act. A draft Incorporated Document is attached at **Appendix A** of **Planning Scheme Amendment documents (Appendix Y)**.Clause 7.5 of the draft Incorporated Document requires preparation of an EMF for the Project to the satisfaction of the Minister for Planning prior to the commencement of any buildings or works associated with the Project (excluding preparatory works permitted under clause 7.11 of the draft Incorporated Document). Clause 7.5 of the draft Incorporated Document requires that the EMF include management measures that are applicable to the design, construction, and operations of the Project.

Clause 7.1 of the draft Incorporated Document requires Development Plans to be prepared to the satisfaction of the Minister for Planning prior to commencement of any buildings and works associated with the Project (excluding the preparation buildings and works under clauses 7.11 and 7.12 of the draft Incorporated Document). Clause 7.5 of the draft Incorporated Document requires that the EMF include the processes and indicative timing for development of the CEMP, an Operations Management Plan (OEMP), a Decommissioning Environmental Management Plan and associated sub-plans.

19.2.2 Governance framework

The Proponent is responsible for preparation of the EES and obtaining primary statutory approvals for the Project, including approval under the EPBC Act, and for the PSA, CHMP, and Quarry Work Plan. The Proponent is responsible for preparing the final EMF following assessment of the EES and prior to or alongside the issuing of Project primary approvals by the relevant statutory authorities. The draft EMF will be placed on public exhibition alongside the EES package.

The final EMF will contain a consolidated list of mitigation measures. The final mitigation measures, and the associated regime of plans, controls, and responsibilities, will be given statutory weight through the PSA including the incorporated document.

Subject to secondary approval determinations, the Proponent will introduce the Project to the market for construction and operation. Secondary approvals, design, construction, operation and decommissioning phase management measures will be the responsibility of the Proponent and its contractors to implement and monitor.

While details have not yet been confirmed, the Proponent will likely enter into one or more design and construct contracts with contractor(s) that have existing environmental management systems (accredited to *AS/NZS ISO 14001:2016 Environmental management systems – Requirements with guidance for use*). The contractor (or contractors) appointed would be required to prepare a CEMP, OEMP and Decommissioning Environmental Management Plan (DEMP) consistent with this EMF and their own environmental management system.

The CEMP, OEMP and DEMP would be required to be prepared in a manner that meets, at a minimum, the requirements of all relevant environmental laws, approvals, approval conditions, this EMF and the MMs. The Proponent would be responsible for ensuring the requirements of these approvals and the EMF are implemented.

19.3 Roles and responsibilities

The Proponent will be responsible for overseeing and engaging contractors and technical specialists across the life of the Project.

As detailed in **Chapter 6** (**Volume 1**), the Proponent will be responsible for implementing consultation and engagement activities throughout the Project's lifecycle. The Proponent will be responsible for reporting compliance and / or environmental management performance to all relevant regulators, as required, under each approval or relevant statutory instrument.

The roles and responsibilities of the key stakeholders relevant to the environmental management of the Project are outlined in **Table 19.2.**

Table 19.2: Environmental management roles and responsibilities

Role	Responsibilities
Victorian Minister for Planning	• Prepare an assessment on the potential environmental effects of the project. • Review the MMs and recommend adoption by relevant regulatory agencies in statutory approvals as part of their assessment of the EES. • Approve the PSA and conditions of the Project's Incorporated Document. • Review and approve the Project's EMF as required by the Incorporated Document. • Receive regular audit and monitoring reports to comply with the EMF and associated environmental management plans. • Where relevant, administer and enforce approvals as responsible authority for the administration and enforcement of the Incorporated Document through the PSA.
Commonwealth Minister for the Environment	• Assess and decide on EPBC Act matters. • Review and approve environmental management plans under the EPBC Act approval, as required. • Receive audit or monitoring reports, as required.
Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC)	• Assess and approve the Project CHMP as the Registered Aboriginal Party (RAP).

Role	Responsibilities
Proponent - Neoen	• Obtain applicable statutory approvals detailed in **Chapter 5 *Assessment and approvals framework*** and summarised in **Section 19.2.** • Revise and update the EMF and mitigation measures in response to the relevant matters and recommendations contained in the Minister's assessment of the EES • Mandate compliance with the EMF in Project contracts • Develop and maintain an EMS in accordance with AS/NZS ISO 14001 • Implement its responsibilities under the EMF • Review, approve and implement Project management plans. • Monitor compliance with the approved MMs and approval conditions across all Project approvals. • Provide summary reports regarding compliance with the EMF to the Minister. • Liaise with regulators, experts and other agencies as required. • Conduct stakeholder engagement and community consultation activities as required.
Proponent, contractors and consultants	• Comply with legislative and approval requirements, including the approved EMF • 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, certified to AS/NZS ISO 14001 and, to the extent relevant, consistent with the Proponent's EMS. • Develop environmental management documentation and management plans in accordance with legislative and approval requirements, including the EMF. • Obtain from regulatory authorities any additional permits and approvals required to design, construct and operate the Project works. • Conduct monitoring, auditing and reporting as required. • Comply with the EMS and relevant legislative and approval requirements. • Receive audit reports from the environmental auditor, conduct internal compliance audits and, provide compliance reporting to authorities and undertake any corrective compliance activities as required.
Independent Environmental Auditor	• Prior to the commencement of works, verify that Project contractors have complied with the relevant MMs and the EMF. • Conduct audits of the Proponent/contractor works at specified intervals to assess compliance with the relevant management plans. • Prepare audit reports for the Proponent containing the results of audits and recommend corrective and preventive actions as required. • Submit reports to the Proponent, contractors and other stakeholders where applicable.
Regulators and agencies	• Review, assess and make determinations on permits and approvals. • Review, comment and where necessary approve relevant plans and documents as required by the EMF.

19.4 Environmental assessment and management

19.4.1 Baseline data

The baseline environmental conditions to be used to monitor and evaluate the residual environmental effects of the Project are summarised in each technical assessment chapter of the EES (**Chapters 7**–**18**). Each technical chapter is supported by one or more specialist technical study. These reports provide a more detailed description of the existing (pre-development) conditions on site and have been attached to this EES as appendices (**Appendices C–W**).

The baseline data and existing conditions will be incorporated into the EMS to inform monitoring and evaluation of the residual environmental effects.

19.4.2 Risk assessment

An environmental risk register will be developed by the Proponent prior to construction commencing to identify environmental impacts and risks of the proposed activities and assess the mitigation measures to ensure impacts and risks will be managed to 'as low as reasonably practicable' (ALARP). The risk assessment process will be consistent with the Australian and New Zealand Standard for Risk Management (AS/NZS ISO 31000:2018, Risk Management – Principles and Guidelines).

The environmental risk register will be regularly reviewed and updated in response to changes to design, construction or operational activities, work methods, new technology, legislation and policy, or the occurrence of incidents or complaints.

19.4.3 Mitigation measures

Impact assessments were undertaken as part of the 20 technical studies prepared for this EES, involving an assessment of the nature and extent of identified impacts that the Project may have on the existing environment. Several factors were taken into consideration when determining the significance of potential impacts on social and environmental values, including the magnitude, spatial extent, and duration of potential impacts.

MMs were recommended to the Proponent by each technical specialist based on the results of each impact assessment, aiming to avoid, minimise, manage, or offset potential environmental, social and safety impacts. The Proponent has reviewed the recommended mitigation measures in the EES technical studies and has adopted a comprehensive set of measures to manage potential impacts from the Project, as described throughout **Chapters 7–18** of the EES and collated in **Table 19.3**. The Project will be delivered in accordance with these proposed mitigation measures.

The mitigation measures in **Table 19.3** are listed in the same order that they appear in the EES chapters.

Table 19.3: Mitigation measures

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Environment Management				
MM-EMF1	**Environment Management System** Develop, implement and maintain an Environmental Management System (EMS) for use through 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 areas	Construction Operation	Chapter 19
MM-EMF2	**Environment Management Framework** Develop, implement and maintain an Environment Management Framework as described in this document and in any applicable clauses of the Incorporated Document.	All areas	Construction Operation	Chapter 19
Biodiversity				
MM-BD01	**Native Vegetation** Before any native vegetation is removed, a Native Vegetation Plan will be prepared in consultation with the Victorian Department of Energy, Environment and Climate Action and to the satisfaction of the responsible authority. The Native Vegetation Plan will: • Include a final Biodiversity Assessment Report or similar which identifies all losses being approved by this Incorporated Document and the associated offset requirements, in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP 2017) • Identify: o Native vegetation to be removed o Any current mapped wetlands that are present on the site o All areas of native vegetation to be retained o Native tree protection zones of trees to be retained o Native vegetation protection zones (no-go zones) for native vegetation to be retained o Areas to be rehabilitated following disturbance activities o Measures to be used during construction to protect native vegetation to be retained including no-go areas and fencing. • Identify where construction activities are limited to zones or corridors to avoid or minimize impacts on native vegetation and habitat.	All areas	Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location

	• Provide measures to ensure that:
	  ○ Activities within 'no-go zones' areas of native vegetation will be effectively protected and retained
	  ○ Any tree or vegetation protection zone associated with the permitted use and/or development is adequately protected, except with the written consent of the Minister.
	Specific measures to be included in the Native Vegetation Plan include:
	• Before development starts, all persons undertaking the vegetation removal or works on site must be made aware of all relevant permit conditions and associated statutory requirements or approvals.
	• Before development starts, a native vegetation protection fence must be erected around all patches of native vegetation and scattered trees to be retained on site. This fence will protect the tree by demarcating the tree protection zone and must be erected at a radius of 12 x the diameter at a height of 1.3 metres (m) to a maximum of 15 m but no less than 2 m from the base of the trunk of the tree. The fence must be constructed of star pickets/ chain mesh/ or similar. The fence must remain in place until all works are completed to the satisfaction of the responsible authority.
	• Except with the written consent of the responsible authority, within the area of native vegetation to be retained and any tree or vegetation protection zone associated with the permitted use and/or development, the following is prohibited:
	  ○ Vehicular or pedestrian access
	  ○ Trenching or soil excavation
	  ○ Storage or dumping of any soils, materials, equipment, vehicles, machinery or waste products
	  ○ Entry and exit pits for the provision of underground services
	  ○ Any other actions or activities that may result in adverse impacts on retained native vegetation.
	To prevent the spread of weeds and pathogens, all vehicles must be made free of soil, seed and plant material before being taken to the works site and again before being taken from the works site, during and on completion of the Project.			

MM-BD02	**Offsets** Appropriate offsets for vegetation losses will be acquired, in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP 2017) (Guidelines). A final offset strategy for the Project will be developed in consultation with public land managers and Project stakeholders including the Victorian Department of Energy, Environment and Climate Action.	All areas	Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	The number of trees assumed lost due to installation of the transmission line is currently greater than the likely losses due to over estimation of Tree Protection Zones (TPZ) encroachment. Over-estimating losses ensures secured offsets will account for minor design changes or unintended encroachment of TPZs and structural root zones during construction. The offset strategy will cover all anticipated offsets (including the potentially over-estimated offsets for predicted TPZ encroachment). It is intended to secure all offsets predicted as part of the impact assessments prior to vegetation removal in accordance with the Guidelines.			
MM-BD03	**Assessment of tree health along Boiler Swamp Road** The following surveys will be carried out on trees adjacent to Boiler Swamp Road to assess for tree health: • A pre-construction survey to benchmark tree health will be conducted to provide a benchmark assessment. This will involve assessment of tree health, structure and ULE. • A post-construction survey will be conducted within 6 months of the completion of construction. The purpose of this assessment is survey for any immediate impacts on tree health, and to re-assess the level of Tree Protection Zone impacts, using accurate data on the actual extent of excavation. • A further post-construction survey will be conducted between 24 and 30 months following completion of construction. The purpose of this assessment is to compare changes in tree health and assess the extent of any tree deaths that can be attributed to the construction of the transmission line. If more offset credits were secured than what was needed, the reconciliation mechanism outlined in the Assessors Handbook (Appendix 8 - https://www.environment.vic.gov.au/__data/assets/pdf_file/0022/91255/Assessors-handbook-Applications-to-remove,-lop-or-destroy-native-vegetation-V1.1-October-2018.pdf) will be used to hold remaining credits for future impacts proposed by the project, or for selling credits on. The surplus credits can only be used if they match the offset requirements of any future impacts, such as minimum Strategic Biodiversity Values and with the consent of the Victorian Department of Energy, Environment and Climate Action/Glenelg Shire Council.	Transmission line	Pre-construction, Operations	Chapter 7
MM-BD04	**Tree Protection Zones** Trees not requiring direct removal will be protected in appropriately marked Tree Protection Zones in accordance with AS 4970:2009 *Protection of trees on development sites*. In accordance with AS 4970:2009, directional drilling at a depth of 600 millimetres or greater will be undertaken to avoid impacts on roots within tree protection zones of Apple Jack trees adjacent to Boiler Swamp Road within Cobboboonee National Park and Cobboboonee Forest Park.	All areas	Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BD05	**Tree pruning** Any tree pruning required will be undertaken by an experienced arborist to ensure unnecessary damage does not occur to the tree. Understorey vegetation will be protected during tree pruning. Any pruning to the canopy or major structural branches of any tree to be retained must be undertaken in accordance with Australian Standard 4373-2007 – *Pruning of Amenity Trees.*	All areas	Construction, Operation	Chapter 7
MM-BD06	**Weed and pest animal control** Best practice methods for weed and pest animal control, such as vehicle and machinery hygiene, will be implemented in collaboration with relevant landowners and land management authorities. These methods will be documented in the Biosecurity Management Plan, to be prepared as part of the Construction Environmental Management Plan. The Biosecurity Management Plan will be prepared to the satisfaction of the responsible authority and in consultation with Agriculture Victoria, and the Victorian Department of Energy, Environment and Climate Action and Parks Victoria where it relates to works associated with the underground transmission line in the Cobboboonee National Park and Cobboboonee Forest Park. The Biosecurity Management Plan must include: • Procedures to prevent biosecurity risks, which may include (but are not limited to): o The cleaning of all plant and equipment before transport onto and off the site. o The use of material/products on site which are free of invasive plants and animals. o A protocol for effective identification of biosecurity risks, early intervention to manage biosecurity risks, ongoing monitoring of biosecurity risks, trace-backs, and integrated control measures when entry, establishment or spread of specific risk targets is identified. o A requirement to comply with approved government or industry standards and procedures for the identification, prevention and management of biosecurity risks that apply from time to time. The Biosecurity Management Plan may be prepared in sections or stages.	All areas	Construction	Chapter 7
MM-BD07	**Boiler Swamp Road** Construction activities for the underground transmission line along Boiler Swamp Road will be limited to the existing road formation. Root investigations will be undertaken before construction of the transmission line section along Boiler Swamp Road commences to assess presence and depth of roots beneath the road formation. The purpose of the root investigations is to inform the potential use of additional alternative impact avoidance techniques (such as Horizontal Directional Drilling (HDD)).	Transmission line	Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	HDD will be used to avoid impacts on Apple Jack (*Eucalyptus splendens*) trees adjacent to Boiler Swamp Road. The locations of the HDD sections must be generally in accordance with the locations shown in Figure6 of the **Flora and Fauna Existing Conditions and Impact Assessment (Appendix C).** A plan showing the locations of the final HDD sections must form part of the Native Vegetation Plan (see mitigation measure MM-BD01), which will be prepared to the satisfaction of the responsible authority before development starts. HDD will be done in accordance with AS 4970:2009 *Protection of trees on development sites,* including ensuring directional drilling is at a depth of 600 millimetre or greater to avoid potential impacts on roots within tree protection zones of Apple Jack trees.			
MM-BD08	**Pre clearance surveys** Pre clearance surveys will be undertaken prior to removal of native vegetation in areas with known occurrences of significant species, such as Dune Fan-flower (*Scaevola calendulacea*), One-flower Early Nancy (*Wurmbea dioica*), Hairy Boronia (*Boronia pilosa*), Wiry Bossiaea (*Bossiaea cordigera*), Rough Daisy-bush (*Olearia asterotricha*), Tiny Violet (*Viola sieberiana*), and Western Golden-tip (*Goodia medicaginea*). Pre-clearance surveys will also investigate the potential occurrence of threatened species including: • Heath Mouse (*Pseudomys shortridgei*) (within the plantation) • Striped Worm-lizard (*Aprasia striolata*) (within the plantation) • Eastern Bearded Dragon (*Pogona barbata*) (within the plantation) • Southern Toadlet (*Pseudophryne semimarmorata*) (drainage lines along Boiler Swamp Road) • Portland Burrowing Crayfish (*Engaeus strictifrons*) (wetlands in the north-east wind farm site) • Hairy Burrowing Crayfish (*Engaeus sericatus*) (wetlands in the north-east wind farm site) • Yellow-bellied Glider (*Petaurus australis australis*) (trees adjacent to Boiler Swamp Road). The focus of these surveys will be on trees with potential hollows. The surveys will be undertaken by an appropriately qualified and experienced ecologist and at an appropriate time of year for each species to maximise the probability of detection. Any known locations, or locations identified in pre-clearance surveys will be marked, and treated as no go-zones if the location is within 30 metres of construction activities. If any threatened flora species are recorded within the previously unsurveyed areas, these areas will be avoided, and subsequently addressed within the Construction Environmental Management Plan for the Project, including updating mapping.	All areas	Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BD09	**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. The sites will be planted with appropriate locally indigenous species, unless otherwise agreed with the landowner or land manager (e.g. disturbed areas of pine plantation would be returned to the forestry company for reintegration into their operations). Rehabilitated areas will be monitored, with adaptive management applied in locations where rehabilitation has involved planting of locally indigenous species to control weeds and ensure successful establishment of final vegetation type. Areas to be rehabilitated, and the rehabilitation arrangements as agreed with relevant landowners, will be detailed in the Project's Construction Environmental Management Plan.	All areas	Construction Operation	Chapter 7
MM-BD10	**Flora and fauna management** A Flora and Fauna Management Plan will be prepared in consultation with the Victorian Department of Energy, Environment and Climate Action and to the satisfaction of the responsible authority. The Flora and Fauna Management Plan will include the following requirements: • Pre-clearance targeted flora and fauna surveys must be undertaken for flora species listed under the *Flora and Fauna Guarantee Act 1988* (Vic) and the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) within areas requiring removal of native vegetation. • Pre-clearance surveys will be undertaken for native vegetation with known occurrences of listed species. • All habitat to be retained is to be clearly marked on construction drawings. • All habitat to be retained is to be clearly marked on the ground (e.g. with temporary fencing and flagging, as well as signage) where located in close proximity to the development footprint, and designated as 'no-go zones'. • Specific measures to be implemented to avoid, minimise and mitigate potential impacts on State and Commonwealth endangered species. • Measures to further minimise and mitigate impacts on native fauna during construction and habitat clearance. • Procedures for wildlife handling at locations requiring removal of native vegetation.	All areas	Construction	Chapter 7
MM-BD11	**Australasian Bittern** Any works, such as road construction, within Brolga (*Antigone rubicunda*) breeding buffers (as the majority of known and suitable habitat for Australasian Bittern (*Botaurus poiciloptilus*) is already within Brolga breeding buffers) will be conducted outside the Australasian Bittern breeding season (October to February).	All areas	Pre-Construction Construction	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	A pre-construction survey will be conducted in January, February, March, and April to confirm breeding has finished before any works are commenced, noting that Australasian Bittern breeding season extends to February. The following measures will also be implemented and will be documented in the Flora and Fauna Management Plan and/or the Bird and Bat Adaptive Management Plan: • Undertake surveys to identify presence and to estimate numbers of Australasian Bitterns in wetland habitats within proximity to the Project Area, to provide a baseline for monitoring. The locations and timing for surveys will be set out in the Flora and Fauna Management Plan and developed in consultation with the Victorian Department of Energy, Environment and Climate Action. • A contingency plan will be developed for stopping works within Brolga breeding buffers if Australasian Bitterns are observed, and the observation is confirmed by a qualified ecologist, within suitable breeding wetland habitat and engaging in breeding activity. • For nocturnal construction works that would occur within 200 metres of potential Australasian Bittern habitat during the breeding season, investigate and implement measures to minimise light spill. • Develop an offset strategy to compensate for mortalities to avoid significant impact on the population as detailed in the Bird and Bat Adaptive Management Plan. GPS/satellite tracking of movements, and other monitoring technologies will also be considered to further inform potential adaptive management strategies for Australasian Bittern. Where these are identified as being available and effective, they will be included in the Bird and Bat Adaptive Management Plan to be prepared for the Project.			
MM-BD12	**Bird and Bat Adaptive Management Plan** A Bird and Bat Adaptive Management Plan (BBAMP) will be developed in consultation with the Victorian Department of Energy, Environment and Climate Action (DEECA) and to the satisfaction of the responsible authority. The BBAMP will be developed prior to construction commencing and will detail the objectives, strategies and activities for minimising bird and bat strike arising from operation of the wind farm, including Brolgas. The primary objective of the BBAMP will be to ensure operation of the Project does not result in net significant or lasting impacts on the viability or conservation status of birds and bats. The BBAMP will minimise, manage and mitigate bird and bat mortality arising from the operation of the wind farm. The BBAMP will also aim to determine whether the presence, abundance and flight behaviours of species of concern are altered, relative to pre-construction levels, in response to the presence and operation of the wind farm.	Wind farm	Construction, Operation	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	The Project will investigate employing smart turbine curtailment as part of the BBAMP to minimise bird and bat collisions through technologies that detect when a bird/bat is approaching a turbine rotor, and shuts down the turbine. These may include radar; optical and/or infra-red camera systems; animal call-recognition or a combination of such technologies. The BBAMP will contain: • A statement of the objectives and overall strategy for minimising bird and bat mortality through design and the operation of the wind energy facility. • A procedure for implementation of suitable mitigation measures for mortalities. • A comprehensive, science-based mortality monitoring program to monitor mortality of listed species and any other bat and avifauna species. The monitoring program must commence when the first turbine is commissioned or such other time as is approved by DEECA and continue for a duration of at least five years. The duration and timing of the monitoring plan may be altered with the written consent of the responsible authority and in consultation with DEECA. Outcomes of the monitoring will be reported to DEECA and be incorporated into the plan to ensure that the management actions are as effective as possible, with impact thresholds to trigger adaptive management responses. This program will: o Monitor for blade strikes and determine the effectiveness of mitigation and management measures, including carcass searches, carcass persistence trials and searcher efficiency trials. o Identify impact triggers for threatened and non-threatened species requiring a management response to reduce impacts. o Conduct surveys at a time interval and sampling frequency agreed to with DEECA to ascertain: - The species, number, age, sex (where possible) and date of any listed species mortality and any other bat and avifauna species mortality. - Seasonal and yearly variation in the number of listed species mortality and any other bat and avifauna species mortality. - Whether further detailed investigations of any potential impacts on listed species and any other bat and avifauna species mortality are warranted. o Procedures for reporting strikes/mortalities of listed species to DEECA within 2 business days of becoming aware of any strike/mortality. o Procedures for reporting strikes/mortalities of bat and avifauna species other than listed species to DEECA monthly.			

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	○ Information on the efficacy of searches for carcasses of birds and bats, and, where practicable, information on the rate of removal of carcasses by scavengers so that correction factors can be determined to enable calculations of the likely total number of mortalities. ○ Measures to verify whether collision mortalities are within the range predicted during assessment of the Project and to identify ongoing improvement measures. ○ Procedures for determining whether further detailed investigations of any potential impacts on native birds and bats are warranted. Any further detailed investigations required are to be undertaken in consultation with DEECA. ○ Procedures for periodic reporting, within agreed timeframes, of the findings of the monitoring to DEECA. Such reports must be made publicly available on the project website. ○ A data sharing agreement to provide georeferenced, time stamped, data that is collected as part of the BBAMP. All data will be entered into a database to be maintained by the wind farm operator. Raw data will be available to relevant regulatory authorities on request. ○ Procedures for the regular removal of carcasses likely to attract raptors to areas near turbines. When the monitoring program required under the BBAMP is complete, the operator will submit a report to the Victorian Minister for Planning and DEECA, setting out the findings of the program. The report will be: • to the satisfaction of the responsible authority • made publicly available on the operator's website. The Independent Environmental Auditor (IEA) will undertake periodic independent review of the BBAMP content and ongoing monitoring of the plan's implementation to ensure it reflects current operational obligations, relevant legislation and policy (see mitigation measure MM-IA01). After considering the findings of the monitoring program and consulting with DEECA, the responsible authority may direct further investigation of impacts on birds and bats. The further investigation must be undertaken to the satisfaction of the responsible authority and DEECA. A framework BBAMP has been provided in Appendix 10 of the **Flora and Fauna Existing Conditions and Impact Assessment (Appendix C).**			
MM-BD13	**Southern Bent-wing Bat Management** The following measures will be included in the Bird and Bat Adaptive Management Plan (BBAMP) to manage potential impacts on Southern Bent-wing Bat: • The BBAMP must include intensive carcass monitoring across the wind farm, particularly in the early stages of operation.	Wind farm	Operation	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Turbines selected for monitoring will consider stratification by habitat type (plantation and farmland), distribution throughout the wind farm site and proximity to known caves. • Frequency of monitoring will be at least monthly during the monitoring period, and the plan will consider pulse surveys during peak activity periods, including autumn and spring. • Within plantation areas the ideal searchable area for carcass searches will include both cleared areas (50 metre radius) and areas under the pine canopy. This will need to be considered in the development of the search regime (including searcher efficiency and carcass retention trials) and mathematical approaches to extrapolating findings will need to be customised to the study. • The plan will specify a sequence of actions to be undertaken if Southern Bent-wing Bat (*Miniopterus orianae bassanii*) mortalities are recorded, including intensification investigations, and potentially low-wind speed curtailment of specific turbines.			
MM-BD14	**Seasonal Nocturnal Low wind speed curtailment** Seasonal nocturnal low wind speed curtailment for Southern Bent-wing Bat will be developed during finalisation of the Bird and Bat Adaptive Management Plan (BBAMP) and include: • Daily timing: 30 minutes following sunset to 3 hours before sunrise. • Seasonal timing: September-November and February–April (5 months). • Climatic conditions: Temperatures above 10°C and not raining. • Cut-in wind speed: 4.5 metres/second. Seasonal nocturnal low wind speed curtailment will be included in the BBAMP.	Wind farm	Operation	Chapter 7
MM-BD15	**Southern Bent-wing Bat Recovery and Funding** The Proponent has made a commitment for a $1,000,000 annual recovery fund for the operational life of the Project (30 years), which is to focus on Southern Bent-wing Bat recovery actions, but also to have the ability to assist in recovery actions for other species. Recovery actions will be workshopped with the Southern Bent-wing Bat recovery team and other relevant conservation organisations. *The National Recovery Plan for the Southern Bent-wing Bat Miniopterus orianae bassanii* (DELWP 2020) and the *Conservation Advice Miniopterus orianae bassanii Southern Bent-wing Bat* (TSSC 2021) detail proposed recovery actions, which includes a range of research to address knowledge gaps relating to understanding population dynamics, movement behaviour and mitigation approaches.	Wind farm	Operation	Chapter 7

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BD16	**Improved powerline visibility** The overhead powerline along Portland-Nelson Road will be marked with standard commercially available bird diverters to increase visibility to birds and bats. Overhead powerlines along Portland-Nelson Road will be marked with diverters visible at night to avoid and minimise Australasian Bittern collisions as this species is most likely to move over the wind farm between dusk and dawn when moving seasonally between inland and coastal habitats.	Wind farm	Operation	Chapter 7
Brolga				
MM-BR01	**Construction during Brolga breeding season** Construction works will not be undertaken within Brolga (*Antigone rubicunda*) breeding buffers when Brolga pairs are present and engaging in breeding activity (mating displays, nest building, incubating, with unfledged chicks), until chicks fledge and the families dispersed from the buffers. This includes but is not limited to cable installation and road construction but excludes substation works. Brolga breeding buffers are as per the buffers shown in **Figure 37a** of the **Flora and Fauna Existing Conditions and Impact Assessment (Appendix C)** If a new site is found within 3 kilometres of the Project footprint, a breeding buffer will be determined and construction activity will stop within the new breeding buffer. The breeding buffer will be developed using the methodology outlined in the **Brolga Impact Assessment (Appendix D).** Construction activity will also not occur within the Brolga breeding buffers during the breeding season (July–November) even if Brolgas have not been observed during pre-clearance surveys, to ensure construction does not prevent Brolgas from breeding in those areas in any given season. Although Brolga breeding season is generally July to November, numbers can vary annually and so the following adaptive mitigation approaches will be implemented during construction: • Pre-construction clearance surveys will be undertaken at all known and suitable breeding wetlands within the Brolga breeding buffers. • Construction in proximity to any wetlands with breeding activity will be postponed while breeding activity is detected. • Monthly monitoring of known and suitable breeding wetlands within the Brolga breeding buffers with triggers to cease construction while breeding Brolgas are detected in proximity to such wetlands. • Monitoring will be undertaken at a minimum distance of 400 metres to avoid undue disturbance on breeding pairs. The main wind farm substation will be accessed from Portland-Nelson Road via Blacks Road and Mt Kincaid Road to completely avoid disturbance to known breeding pairs. If a pair is observed during construction or operation of the wind farm, adaptive measures will be implemented to monitor the pair, breeding activity and breeding success, and to avoid and minimise potential disturbance impacts.	All areas	Construction	Chapter 8

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BR02	**Brolga Monitoring and Compensation Plan** A Brolga Monitoring and Compensation Plan will be prepared prior to Project construction in accordance with the I*nterim guidelines for the assessment, avoidance, mitigation and offsetting of potential wind farm impacts on the Victorian Brolga population* (DSE 2012). The aim of the Brolga Monitoring and Compensation Plan is to achieve net zero impact on the Victorian Brolga population. The Brolga Monitoring and Compensation Plan must be prepared in consultation with the Victorian Department of Energy, Environment and Climate Action (DEECA) and to the satisfaction of the responsible authority. The Brolga Monitoring and Compensation Plan must: • Be implemented for the life of the Project. • Identify the locations of potentially at risk Brolga breeding and migration activities. • Include recommendations in relation to a mortality rate for Brolga that would trigger the requirement for responsive mitigation measures to be undertaken. • Specify who is accountable for implementing the plan and the monitoring required under the plan. • Specify the locations of historical and potential Brolga breeding wetlands that will be enhanced. • Include evidence of landholder agreements to participate in the breeding site enhancement project for its duration. • Include appropriate methods of enhancement. • Include monitoring and reporting requirements. Implementation of the Brolga Monitoring and Compensation Plan must commence before the development starts, and must be to the satisfaction of the responsible authority in consultation with DEECA. Compensatory measures to achieve net zero impact on the Victorian Brolga population, from modelled collision impacts resulting from the Project operation must include selection and management of wetland habitats to improve Brolga breeding success. Approximately one juvenile every two years will need to be added to the population based on the population viability analysis, for an estimated 0.21 annual mortality from wind farm operation. The population viability analysis must be re-run on the basis of a final Project design to provide an indication of the level of positive management that would be required to achieve a zero net impact on the south-eastern Australian Brolga population.	All areas	Design	Chapter 8

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Surface Water				
MM-SW01	**Dewatering** • Water collected from excavated areas will be recycled and reused for construction activities such as dust suppression. • Dewatering activities will be managed in accordance with the Dewatering Plan in the CEMP. The plan will adopt a management hierarchy that prioritises the prevention of discharges into surface waters as far as is reasonably practicable. The relevant suggested measures outlined in Environment Protection Authority (EPA) Victoria Publication: *1834: Civil Construction, Building and Demolition Guide (2020)* will also be incorporated into the CEMP. • Water resulting from dewatering activities will be tested for potential contaminants. • Ponded stormwater and rainwater collected in excavations may be suitable for onsite treatment, reuse or discharge, subject to water quality testing results. • Water from excavated areas will not be discharged into or within 50 metres of a watercourse, drainage pathway or wetland without prior treatment. • Where deemed suitable, discharge of collected water to land will be to areas of low gradient to avoid soil erosion or sedimentation of land or water. Discharges to land will also avoid areas that are saturated or at risk of becoming inundated. • Sediment control devices will be used where required, to remove suspended soils and dissipate flow. These devices may include sediment fences or basins. Groundwater that is contaminated by acid sulfate soils will be tested and discharged or disposed in accordance with protocols outlined in mitigation measure MM-CA03.	All areas	Construction	Chapter 9
MM-SW02	**Surface water run-off** • A water quality monitoring and adaptive management program will be implemented to ensure the effectiveness of controls that are implemented to mitigate potential risks to surface waters, and detail 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 waters. • Monitoring of surface waters will be conducted upstream and downstream of works areas prior to construction, during construction and post-construction at the appropriate frequency (i.e., weekly during watercourse crossings works) to understand any changes to environmental values in line with EPA publication 1896: *Working within or adjacent to waterways.* • All construction works will be carried out in accordance with industry best practice guidelines including the IECA Best Practice Erosion, Sediment Control Guidelines and EPA Publication 1834 *Civil Construction, Building and Demolition Guide*, EPA Publication 1894: *Managing Soil Disturbance*, and EPA Publication 1895: *Managing stockpiles.*	All areas	Construction	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location

	• A Project-wide Construction Environmental Management Plan will be developed and implemented, incorporating a Sediment, Erosion and Water Quality Management Plan (SEWQMP) for all work areas. The SEWQMP will outline the erosion and sediment mitigation measures to be implemented for each work area. Erosion and sediment control measures will include:
	  ○ Sediment control devices such as bunding or silt fences around stockpiled material, earthworks and disturbed areas.
	  ○ Clean water diversion around disturbed or unvegetated areas.
	The SEWQMP will be developed in consultation with the Glenelg Hopkins Catchment Management Authority and Environment Protection Authority Victoria.			

MM-SW03	**Watercourse Trenching** • All trenched waterway crossings will be carried out in accordance with industry best practice guidelines including the IECA *Best Practice Erosion and Sediment Control Guidelines* and EPA Publications 1834 *Civil Construction, Building and Demolition Guide* and 1896 *Working within or adjacent to waterways.* • Waterway crossing works and reinstatement will be carried out in consultation with the Glenelg Hopkins Catchment Management Authority. • Trench crossing works will be programmed for dry or low flow conditions, such that works are preferentially scheduled for drier months of the year and lowest flow of the waterway and works are avoided when high rainfall events are expected. • Cabling will be assembled and prepared so that it can be installed as quickly as practicable once trenching over a watercourse has been completed. • The exposed trench within a watercourse and riparian zones will be reinstated immediately following the installation of the cable, including providing suitable compaction and revegetation. • Waterway reinstatement will be designed to avoid future erosion. This may include the use of riprap made of stones to stabilise the waterway. If necessary, a geofabric will be provided to prevent erosion and scour until the vegetation has established. • Visual monitoring for changes in turbidity will be undertaken downstream of the trench during flow events, if the trench has not been reinstated. • For 12 months after completion of trenching works, trenched waterways will be visually inspected following significant rainfall/flow events. If during these visual inspections waterway reinstatement works are observed to be not performing appropriately (i.e. erosion is occurring), rectification measures will be developed and implemented in a timely manner.	All areas	Construction	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-SW04	**HDD watercourse crossings** • The proposed horizontal directional drilling (HDD) profile design and work method statement will be submitted to the Glenelg Hopkins Catchment Management Authority and approved prior to the commencement of works at the Surrey River 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 HDD operations to reduce the risk of frac-outs (e.g. mud weight, viscosity, pressure). • Drilling equipment and configuration will be appropriate for the proposed HDD operation to prevent frac-out. • Pollution prevention strategies will be in accordance with Environment Protection Authority Publications 1834 *Civil Construction, Building and Demolition Guide* and 1896 *Working within or adjacent to waterways*, and the IECA *Best Practice Erosion and Sediment Control Guidelines.* • Sediment control devices such as silt fences will be used to remove suspended solids from waterways and dissipate flow where required. • Earth bunds and/or drainage channels will be placed around the upper edges of drill sites and work areas to divert natural run-off around and away from the site and prevent mixing with drilling compound run-off. • Sump pits will be constructed at the bottom of the drill site. The sump pits will be positioned to capture run-off from the drilling compound. Materials collected in the sump pit will be assessed and managed in accordance with industry best practice guidelines for HDD operations. • An earth bund or silt fence will be placed around the sump pit to contain any spillage. • All facilities utilised in the surface mud handling (mixing, cleaning and pumping) during the HDD activities will be bunded.	Transmission Line	Construction	Chapter 9
MM-SW05	**Fuel and chemical spills** • The storage of fuels and chemicals will comply with the requirements of the *Dangerous Goods (Storage and Handling) Regulations (2022), EPA Guideline 1698; Liquid Storage and Handling Guidelines and EPA Publication 1834; Civil Construction, Building and Demolition Guide.* • Fuels and chemicals stored on site will be minimised. • Fuels or other potentially contaminating material will not be stored in areas that are subject to inundation (e.g. floodplains), and at least 50 metres from sensitive receptors, such as waterways, wetlands and drainage pathways.	All areas	Construction Operation	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Fuel storage facilities will be bunded. • Spill kits will be available at locations where machinery/plant are operating and at refuelling points and fuel and chemical storage locations. • Spills of hazardous materials will be rendered safe and, where required, collected and transported by licenced contractors for disposal at appropriately licenced facilities, including cleaning materials, absorbents and contaminated soils. • Staff training will include spill management procedures. • Refuelling of vehicles, plant and equipment (excluding handheld machines) will be undertaken in a designated refuelling area with appropriate measures to contain spills. • Refuelling of vehicles, plant and equipment will not occur within 50 metres of a watercourse, drainage pathway or wetland. • Measures to manage and monitor fuel and chemical spills will be incorporated into the Hazardous Substance Management Plan, which will form part of the Construction Environmental Management Plan and Operation Environmental Management Plan.			
MM-SW06	**Changes to flow regime during construction** • A Project Construction Environmental Management Plan will be developed and implemented, incorporating a Sediment, Erosion and Water Quality Management Plan (SEWQMP) for all work areas. The SEWQMP will outline the flood risk management measures for each work area. • Construction compounds, drilling compounds, laydown areas and material storage areas will be located outside of floodplains and areas that are subject to inundation (outside the 1 % Annual Exceedance Probability flood extent, where it is practical given other Project commitments and constraints. Where this is not considered practical, site design optimisation will minimise the extent of works and storage in the floodplain / areas subject to inundation. • Excavation material, topsoil and trench spoil will not be stockpiled, stored or placed in areas that are flood prone or subject to inundation. • Site activities, facilities, infrastructure and materials will be set back from drainage pathways and waterways to the satisfaction of the Glenelg Hopkins Catchment Management Authority and, in the absence of regulatory requirements, in accordance with International Erosion Control Association Best Practice Erosion and Sediment Control guidelines.	All areas	Construction	Chapter 9
MM-SW07	**Changes to flow regime during operation** • Proposed infrastructure will be designed to maintain existing levels of flood protection associated with overland flow paths (considering flood levels, flows and velocities) through	All areas	Pre-construction, Operation	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	compliance with Glenelg Hopkins Catchment Management Authority (GHCMA)requirements for flooding and overland flows. • Permanent surface structures will be designed to allow a set back from waterways and drainage pathways and to maintain existing flow regimes. • Modifications to existing flow pathways (e.g. drainage diversions) will be carried out to the satisfaction of the GHCMA and Glenelg Shire Council.			
MM-SW08	**Stormwater management at operational facilities and roads** • Stormwater produced at operation and maintenance facilities and on access tracks will be reused on site as much as possible. • A water collection and treatment system will be implemented to ensure that stormwater discharges comply with the Environment Reference Standard. Stormwater treatments will be incorporated into the Project design for the operation and maintenance facilities and access tracks to capture surface run-off and reduce pollutants in accordance with the *Best Practice Environmental Management Guidelines* (CSIRO 1999). • Surface water discharges will be designed in consultation with Glenelg Hopkins Catchment Management Authority to ensure there is no adverse impact on the capacity, quality and integrity of the receiving waterway.	Wind farm site	Design Operation	Chapter 9
MM-SW09	**Surface water monitoring and contingency plan** The Sediment, Erosion and Water Quality Management Plan will outline the surface water monitoring and contingency measures for the construction phase, including a monitoring program (including, as a minimum, visual monitoring during construction activities and consideration of weather conditions) of sediment management measures, and a complaint investigation and response plan. This contingency plan will be aligned with industry best practice guidelines and will consider a broad range of measures that will be adopted during the event of an exceedance or failure of a mitigation measure. Aspects of the contingency plan would consider the following: • methods to prevent water entering excavations. • controls to be implemented when a storm event is forecast. • measures to ensure that waterways and floodplains retain sufficient flood detention capacity to moderate peak water flows. • a flood warning system. clean up procedures, including disposal of excess water. notification of relevant authorities if unplanned incidents occur that could pose a risk to the environment.	All areas	Construction	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Groundwater				
MM-GW01	**Turbine Location** To minimise the risk of final foundation locations intersecting groundwater, turbine locations will avoid areas with an inferred depth to groundwater of less than 6 metres below ground surface.	Wind farm site	Design Construction	Chapter 9
MM-GW02	**Dewatering Plan** Dewatering activities will be managed in accordance with the Dewatering Plan in the Construction Environmental management Plan. If groundwater is to be intersected at a turbine foundation location, the following hierarchy of contingency measures will be undertaken: • The turbine will be moved to higher ground to avoid groundwater intersection. • A Dewatering Plan will be developed specific to each turbine location that could include but not be limited to: o Assessment of drawdown and dewatering volumes, based on site specific information including depth to water, hydraulic conductivity, base of foundation elevation relative to Groundwater Dependent Ecosystems (GDE)s and/or consumptive use bore groundwater level, and distance to the GDE and/or consumptive use bore. o Monitoring well installation and groundwater level monitoring to be based on drawdown estimates. o Discharge of foundation dewatering to ground and down hydraulic gradient of the turbine to reduce drawdown and minimise loss of groundwater flow within the system (subject to groundwater quality and regulatory approvals) (see mitigation measure MM-GW05). o Triggers and actions to be identified such as cessation of dewatering.	Wind farm site	Construction	Chapter 9
MM-GW03	**Water supply investigation** Additional water supply investigations as part of groundwater take and use application to be undertaken in consultation with SRW. Water supply extraction bores to be located along Nelson-Portland Road and within the deeper UMTA to reduce potential impacts on groundwater users; in consultation with SRW. Groundwater allocation to be short-term and temporary transfer only (in the order of 2–3 years during construction).	Wind farm site	Construction	Chapter 9
MM-GW04	**Registered bore locations** Visually confirm location of registered and unregistered bores. Prior to construction establish potential for damage or loss of access to existing bores in consultation with the landholder/bore owner. Agree to make good arrangements between the Proponent and the landholder/bore owner if required.	All areas	Construction Operation	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-GW05	**Groundwater contamination management** The following measures will be implemented if contaminated groundwater is encountered: • If groundwater is extracted from the area near TP05 during construction activities, it will be tested prior to discharge to determine whether it must be remediated or sent offsite for disposal or can be discharged to land. Assessment must be completed under the Environment Protection Act 2017 (Vic), the National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended 2013) and associated guidance documents. • If groundwater is encountered in current or former pine plantations, groundwater must be sampled and characterised prior to disposal in accordance with the General Environmental Duty and regulatory approvals. Processes for groundwater management, including sampling and characterisation prior to disposal, will be set out in the Dewatering Plan (see mitigation measure MM-GW02). • If there any are observations of odour, discolouration, sheen, or other signs of potential contamination in extracted groundwater, the abstraction of groundwater will cease. Groundwater will then be sampled and tested to confirm whether additional management measures and remediation are required, and whether abstraction can re-commence. Groundwater that is contaminated by acid sulfate soils will be tested and discharged or disposed in accordance with protocols outlined in the Acid Sulfate Soil Management Plan (see mitigation measure MM-CA03). Specific measures to manage contaminated groundwater (if intersected) will be included in the Dewatering Plan in the Construction Environmental Management Plan (see mitigation measure MM-GW02).	Wind farm site	Construction Decommissioning	Chapter 9
MM-GW06	**Groundwater level monitoring program** A groundwater level monitoring program will be developed and included in the Construction Environmental Management Plan to assess for effects on groundwater levels from foundation dewatering (if encountered) and groundwater supply extraction. This will be informed by baseline data results and include trigger levels and contingency measures. It will also be informed through consultation with Southern Rural Water (SRW) during the groundwater take and use licence application and reflect conditions likely to be attached to any temporary licence agreed by SRW. A groundwater level monitoring program is to be developed generally in accordance with the indicative program provided in the **Groundwater Impact Assessment (Appendix G)**. This will provide additional baseline (pre-construction) data and confirm 'natural' variations in groundwater levels.	Wind farm site	Pre-Construction, Construction	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	Baseline monitoring of groundwater levels will start 12 months prior to the commencement of water supply pumping and will include: • Continuous groundwater level monitoring (e.g. hourly) via data loggers at monitoring wells MW01 to MW09 and MB01. • Monthly download of data logger and manual gauging at MB01. Quarterly downloading of data loggers and manual gauging of groundwater levels at all other monitoring wells. • Quarterly download of State Observation Bores 101246 & 65058 from WMIS website. • Quarterly collation of surface water/wetland data (available from Glenelg Hopkins Catchment Management Authority). • Monthly download of water extraction rates and volumes from production bore(s) and pump run hours. It is anticipated that monitoring during the Project's construction phase will be similar in scope to the baseline monitoring. Construction phase monitoring will be finalised based on consultation with SRW and other stakeholders during the groundwater take and use licence application process. Results of baseline and construction monitoring will inform the need for post-construction monitoring and the scope of any such monitoring, although no residual impacts were identified for the operational phase of the Project. The groundwater level monitoring program will also consider any overlaps with surface water components. Ongoing communication and sharing of information regarding groundwater level and surface water level between the Proponent and Catchment Management Area will be undertaken.			
Groundwater Dependent Ecosystems				
MM-GD01	**GDE Monitoring and Management Plan** A groundwater dependent ecosystem (GDE) Monitoring and Management Plan will be developed prior to construction commencing in collaboration with the Catchment Management Area, Southern Rural Water, and the Victorian Department of Energy, Environment and Climate Action and to the satisfaction of the responsible authority. The GDE Monitoring and Management Plan will include: • At least daily groundwater level data collection (via data loggers) in pairs of target bores along the swamp edge and inland to measure changes to hydraulic gradient. Key bores include pairs MW05 and MW06, and MW07 and MW08. • At least daily groundwater levels data collection (via data loggers) in two "background" bores to measure natural variations so that any deviations from natural variations in the target bores can be identified. Key background bores would be MW01 and MW09.	Wind farm site	Construction	Chapter 9

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location

	• Monitoring of these bores will begin at least 12 months before pumping commences so that baseline conditions (and natural variations in hydraulic gradient) can be determined.
	• Before pumping commences, target trigger levels will be developed (based on the seasonal baseline condition monitoring) so that changes to the hydraulic gradient outside of natural variations triggers contingency measures, such as temporary cessation of pumping, reduction in pumping volumes or introduction of an intermittent pumping schedule, to be determined prior to pumping commencing.
	• Measures to ensure the hydraulic gradient to the Glenelg Estuary and Discovery Bay Ramsar site is maintained throughout the life of the groundwater extraction (construction – 2 years) and during system recovery (additional 2 years) via a monitoring plan with triggers and a set of contingencies. Ensure that assumptions underpinning the GDE Monitoring and Management Plan are updated as pumping progresses if drawdown varies from predictions.
	• Assessment against trigger levels and comparison of drawdown vs predicted drawdown will happen at a minimum biannual frequency.
	  ○ At least daily groundwater level data collection (via data loggers) in MB01 to compare actual drawdown values to predicted drawdown. In the first 6 months of pumping the actual compared to predicted will be assessed at a minimum monthly basis so that the predictions can be validated and updated. After this period, biannual assessment in line with the target and background bore assessments.
	  ○ Data loggers will be downloaded at a minimum of quarterly frequency and validation manual water level readings taken so that dataloggers errors can be noticed and corrected in a timely manner.			

Contamination & Acid Sulfate Soils				
MM-CA01	**Management of contaminated soil** If soils are to be moved offsite for reuse, treatment or disposal, soil sampling will be undertaken in accordance with the Environment Protection Authority (EPA) Victoria Publication IWRG702 *Soil Sampling* to ensure the appropriate hazard categorisation is applied. A designated application will be made to EPA Victoria to reclassify soils within Cobboboonee National Park and Forest Park where the concentration of nickel exceeds the upper fill material criteria of EPA Victoria Publication 1828.8 *Waste disposal categories – characteristics and thresholds,* as the nickel is considered to be naturally occurring background levels.	All areas	Construction Decommissioning	Chapter 10

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-CA02	**Management of unknown contamination** In the event that unknown contamination is uncovered during Project construction works, the following measures will be undertaken: • Cessation of ground disturbance at the unknown contamination location and within the immediate vicinity, and isolation of the area (if required). • Assessment of the unknown material by an experienced environmental or health and safety practitioner (depending on the nature of the material) and appropriate disposal or treatment of the material. • Assessment of the site contamination in accordance with Environment Protection Authority Victoria (EPA Victoria) guidelines and determination and implementation of appropriate remedial action (if required). • Where potentially impacted waste soils are encountered they must be sampled and categorised in accordance with EPA Victoria Publications IWRG702 and 1828.2 and managed in accordance with regulations. These measures will be outlined in the Project's Construction Environmental Management Plan.	All areas	Construction Decommissioning	Chapter 10

MM-CA03	**Acid Sulfate Soil Management Plan**
	A detailed Acid Sulfate Soil Management Plan (ASSMP) will be developed in conjunction with the Construction Environmental Management Plan and implemented to manage Acid sulfate soils (ASS) and any associated waters. Development of the ASSMP will be guided by the *Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils*and the National Acid Sulfate soils guidance (https://www.waterquality.gov.au/issues/acid-sulfate-soils). The ASSMP will include (but not be limited to) the following:
	• Project overview, including overview of proposed disturbance works.
	• Description of the site and environmental setting, including topography, hydrology and geology, groundwater characteristics, land use and presence of sensitive receptors.
	• Summary of the ASS investigations and assessment undertaken in the Project Area, including spatial distribution and expected occurrence of ASS associated with the Project, and potential impacts.
	• Timing of planned Project works and environmental management activities.
	• Description of the ASS management strategies that will be used to minimise impacts from the Project works, including strategies for:
	  ○ Avoiding or minimising disturbance of ASS and preventing oxidation of metal sulfides.
	  ○ Planned treatment or neutralisation of ASS and any run-off or acidic leachate that might be generated, and potential reuse of treated ASS or disposal of ASS.
		All areas	Construction
			Decommissioning
				Chapter 10

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	○ Water management, including onsite and offsite water table management before, during and after disturbance, and containment of run-off or acidic leachates. ○ Treatment for reduction or neutralisation of acidity, spoil management including offsite reuse or disposal, water management, monitoring, record keeping, reporting and Environment Protection Authority Victoria (EPA Victoria) consultations and approvals. • Soil and water monitoring requirements, and treatment validation. • Reporting requirements and record keeping relating to excavation/backfill locations and volumes, treatment methods and volumes, monitoring, laboratory analysis monitoring and incidents. • Contingency procedures to manage potential impacts/incidents, including trigger levels, and remedial and restorative actions. • Consultation with relevant stakeholders and authorities and approval process associated with the ASSMP. • Further assessment of ASS to permit calculation of limiting rates. If removing and disposing of ASS offsite, either an Environmental Management Plan (EMP) will be prepared addressing ASS and submitted to EPA Victoria for approval, or ASS will be disposed of at a lawful place that already has an EPA-approved EMP for managing ASS.			
MM-CA04	**Spoil Management** Management control measures relating to handling and stockpiling of spoil, movement and transport of spoil, and the reuse or disposal of spoil materials will include: • Implementation of dust control measures during excavation and land disturbance activities. These may involve minimising excavation and movement of soils in windy conditions, minimising movement of vehicles on exposed areas, and dampening down stockpile soils and vehicle tracks. • Managing surface run-off during or after rain events and preventing potentially contaminated stormwater or run-off from entering waterways through construction of silt fences and other measures. If generation of water is expected as part of the control measures implemented (e.g. run-off or dewatering of excavations) a Sediment, Erosion and Water Quality Management Plan will be implemented as part of the Construction Environmental Management Plan. • Management of unknown or unexpected contaminated wastes that may be uncovered during excavation works (see mitigation measure MM-CA02). • The stockpiling area for placement of excavated material will be in a stable area, as far from waterways as possible or areas subject to waterlogging or ponding. Stockpiles will be appropriately managed to prevent dust generation (via wind erosion) or stormwater run-off, in	All areas	Construction	Chapter 10

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	accordance with Environment Protection Authority Victoria (EPA Victoria) Publication 1895 *Managing stockpiles*. This will involve: ○ Covering (if necessary) or spraying the stockpiles to keep the soil damp to mitigate wind erosion (dust generation). ○ Construction of silt fences and other measures to capture and prevent run-off from the area. ○ Establishment of exclusion zones or barriers to prevent access and contact with soil by unauthorised people. • Specifically in relation to spoil management associated with construction of the underground transmission line beneath Boiler Swamp Road, excess spoil that needs to be removed would initially be laid on tarpaulins at existing road intersections within the Parks (where no impact to native vegetation would occur), then transported at the end of each day to either an agreed location within the Parks (identified in consultation with DEECA and Parks Victoria), or if no location within the Parks is identified, to an offsite laydown areas to be reused elsewhere for wind farm construction or offsite disposal at an appropriate licensed facility. Disposal locations would be identified in the CEMP to be prepared in consultation with relevant authorities. • Stockpiling of excavated materials in designated areas until the material is reinstated to the excavation as backfill (if appropriate to do so). • Stockpiling for an extended period of time will be avoided in order to mitigate potential environmental impacts such as dust and odour generation and stormwater and sediment run-off. The timing and methodology of backfill will be carefully considered. Subsequent compaction of backfill will reinstate a finished trafficable surface. • Contaminated or potentially contaminated soil and excavated materials will be stockpiled separately to non-odorous and visibly 'clean' soils, on hardstand or high-density polyethylene sheeting, and considered as contaminated until the contamination status is assessed by sampling and analysis of the stockpiled material for offsite disposal. Contamination assessment will be undertaken by a suitably experienced environmental practitioner. Exposure to contaminated spoils will be minimised as described above (e.g. covering, exclusion zones, and silt fences). • In the event that offsite disposal of excavated spoils is planned (e.g. spoils are not considered appropriate for reuse, or surplus spoils remain): ○ Stockpiles will be sampled and analysed for waste characterisation and categorisation purposes in accordance with EPA Victoria IWRG702 *Soil Sampling* prior to removal from site. ○ Contaminated spoil must be collected and transported by an authorised/licenced waste contractor utilising the Waste Tracker scheme.			

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	○ Vehicles transporting waste material onsite will operate in a manner to prevent loss of materials during loading, transport and unloading activities. Odorous waste must be covered during transportation. Records of excavated soil and stockpile movements, including (but not limited to) the location of materials excavated, quantities, descriptions of materials encountered, laboratory test certificates, waste assessment and categorisation reports, disposal location, and waste receipts (from the waste transporter), will be maintained by the site owner and operator through the Waste Tracker system.			
MM-CA05	**Contamination management** The Construction Environmental Management Plan will set out the controls for the transportation, storage and management of fuels and any chemicals to be used during construction, maintenance and decommissioning of the Project. This will include but not be limited to: • Maintenance of oil leaks and servicing of operational fluid will take place prior to equipment delivery to site. Any greasing of machinery or minor or emergency servicing that cannot be undertaken off-site will be carried out in a designated area that has an impermeable drained and bunded floor which can collect hydrocarbons/solvents, wastewater or other liquids, preventing soil and water contamination on and off site. • Any spillage or leakage and resultant contaminated soil (if any) will be removed and disposed of using approved waste management providers as soon as practicable. • Any fuel, oil and other chemicals that are to be stored on site will be stored in suitable containers and on hardstand floors (e.g. shipping containers, concrete) contained within a bunded area, protected from stormwater incursion. Spill kits will be located in accessible areas near where any hazardous substances or chemicals are securely stored and/or used, and in mobile fuel refuelling vehicles.	All areas	Construction	Chapter 10
MM-CA06	**Pre-construction peat-assessment** Once locations of the turbines and other infrastructure have been finalised, a pre-construction peat assessment will be undertaken to determine whether peat exists in proposed excavation areas (e.g. for turbines, substations and underground reticulation) and whether specific fire mitigation measures are required. This peat assessment will be limited to low-lying high risk areas of the Project Area where excavation is required, in farmland in the wind farm site east of Portland-Nelson, and within farmland in the transmission line corridor east of Cobboboonee Forest Park. These high risk areas have been identified through the **Environmental Site Investigation** (**Appendix I**) and are summarised in **Chapter 10** ***Soil contamination and acid sulfate soils.*** The peat assessment will build upon the work already done to confirm the low-lying areas that would be of higher risk of peat occurrence. Test pitting will be done in areas where infrastructure is proposed within these high risk areas to confirm the presence of peat.	All areas	Construction	Chapter 10

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	If peat is found in areas to be excavated, this will trigger implementation of the Peat Management Plan, which will be developed as part of the Construction Environmental Management Plan. The Peat Management Plan will detail the safe work practices to be implemented when working in areas with peat and the remediation works required if these areas are to be disturbed.			
Aboriginal Cultural Heritage				
MM-AH01	**GMTOAC Consultation** • Continue consultation and involvement where practicable with Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC), before, during, and after the construction phase. • GMTOAC Research Principles and Guidelines must be employed to ensure that Gunditjmara Country and cultural values are respected and protected. • Where reasonably practicable, consult and involve GMTOAC in future rehabilitation works. • Maintain meaningful and respectful consultation with GMTOAC in relation to potential project opportunities for further GMTOAC coordination and participation during rehabilitation works.	All areas	All phases	Chapter 11
MM-AH02	**CHMP 17822** Prepare, gain approval, and implement contingencies of the Cultural Heritage Management Plan in accordance with the *Aboriginal Heritage Act 2006.*	All areas	All phases	Chapter 11
MM-AH03	**Exclusion zones** Avoidance of previously registered and identified Aboriginal places through establishing an exclusion zone around the known extent of the Aboriginal place via a buffer around the place extent with protective fencing. The extent of the buffer will be determined in further consultation with Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC). Furthermore, consultation with GMTOAC will determine if the protective temporary fencing must remain in place during operation and decommissioning/rehabilitation phases of works. Protective fencing will be suitable temporary fencing (e.g. with concrete pads and wire chain mesh (or similar)) that must be erected prior to the commencement of ground disturbing works associated with the construction phase in the Project Area. GMTOAC will further undertake an inspection of the protective fencing prior to the commencement of the construction phase of works in the Project Area to ensure that the Aboriginal places are avoided by proposed works.	All areas	Construction	Chapter 11

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Historic Heritage				
MM-HH01	**Site Induction** All employees/contractors involved in ground disturbing works will be provided with an historic heritage awareness induction. The inductions will be provided by a suitably qualified heritage practitioner who is knowledgeable about the history of the region and the Proponent's legal obligations for heritage protection, and will provide the following information: • Background history of the region. • Heritage sites in the vicinity of the Project Area. • Guidance on identifying small artefacts and archaeological deposits. • Employee/contractor obligations for heritage protection under the relevant legislation. • Steps to be taken if unexpected archaeological material is encountered during Project activities, including who to report these finds to (see MM-HH03).	All areas	Construction Decommissioning	Chapter 11
MM-HH02	**Avoidance of historical heritage items** The Proponent will implement the following measures to ensure that impacts on identified heritage sites within the study area are avoided: • All employees/contractors involved in ground disturbing works within 100 metres (m) of a known heritage site will be provided with an historic heritage awareness induction (see MM-HH01). • Known heritage sites will be marked on design and construction plans. • Any micro-siting of Project infrastructure will avoid direct impacts on heritage sites. • Heritage sites within 10 m of Project works will be marked with suitable exclusion fences, bunting or similar. Signage will be used to clearly indicate that marked sites are to be avoided. • A qualified heritage advisor will be engaged to inspect ground disturbing works to ensure that avoidance measures are being implemented. ▪ If impacts on the curtilage of recorded historic places such as the Former Kentbruck School (H7121-0053) cannot be avoided, the Proponent will seek to obtain the following approvals for the Project: o Consent approval from Heritage Victoria under the *Heritage Act 2017* (relevant to sites listed on the Victorian Heritage Inventory). Applications for the above approvals will be prepared by a qualified and experienced archaeologist. The applications will describe the Project's historic heritage investigative methodology, reporting requirements, and artefact discard and management policy. The Proponent will comply with any conditions required by the consent/planning approvals.	All areas	Construction Decommissioning	Chapter 11

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-HH03	**Unexpected discovery of historic sites** The *Heritage Act 2017*requires mandatory reporting of any archaeological site that is identified via the submission of site cards to Heritage Victoria (HV). If any excavation or damage occurs to an archaeological site, an application for Consent must be submitted to and approved by HV. In this event, the Proponent will not recommence works until a decision is made by HV and in accordance with any relevant heritage approval regarding the heritage status of the site. If any unexpected archaeological artefacts or features are identified during Project works, the Proponent will implement the following unexpected discovery procedure: • Works in the vicinity of the finds will cease. • The location of the finds will be marked off and no work will commence in the area until it has been assessed. • A qualified heritage professional will be engaged to assess the material and determine if it is a significant archaeological place. • If so, HV will be contacted, a site card will be submitted for listing of the site on the Victorian Heritage Inventory, and a Consent application will be submitted if the site cannot be avoided by the Project works. The Construction Environmental Management Plan will include procedures to be implemented if an unknown historic heritage site, value or object is identified during works associated with the Project. The procedures will include guidelines for the collection or salvage of historic heritage objects.	All areas	Construction Operation Decommissioning	Chapter 11
Landscape Character & Visual Amenity				
MM-LV01	**Public view locations** Consultation with Parks Victoria and Great South West Walk committee to investigate and implement potential mitigation to minimise visual effects on key public view locations. Mitigation works shall consider additional planting strategies to increase levels of screening at specific sensitive viewpoint and/or to install/upgrade existing infrastructure at these locations to improve the sites as a way to offset potential impacts.	All areas	Design	Chapter 12
MM- LV02	**Landscape screening** Soft landscape works (tree and shrub planting) will be installed at non-involved dwellings within 10 km of wind turbines where the Project would result in Moderate - High to High visual effects. Landscape works will aim to filter or screen views toward wind turbines. The landscaping works will consider any zone and/or overlay planning requirements (including requirements of the Bushfire Management Overlay where applicable).	All areas	Design	Chapter 12

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location

	The implementation of landscaping works will be based on a reasonable and feasible approach to provide substantive screening of wind turbines, 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:
	• Must be implemented to the satisfaction of the responsible authority
	• Must not be altered or modified without the written consent of the responsible authority.			

MM-LV03	**On-site landscaping plan** Development of an on-site landscaping plan to screen substations, buildings and lower infrastructure. This plan would include details of plant species to be used, and a maintenance and monitoring program.		Design	Chapter 12
MM-LV04	**Infrastructure design and materials** Electrical infrastructure, and associated buildings and structures would be designed to have non-reflecting surface finishes and appropriate colour finishes that considers the existing visual backdrops.	All areas	Design	Chapter 12
MM-LV05	**Lighting** Permanent project lighting associated with the Operations and management facility and terminal station and temporary lighting associated with construction areas is to 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.	All areas	Construction Operation	Chapter 12

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• installing perimeter landscaping to intervene in views to lighting from identified sensitive receptors (residential dwellings).			
MM-LV06	**Shadow flicker assessment** A pre-construction shadow flicker assessment will be undertaken prior to construction once the final turbine layout has been determined, to determine potential effects of shadow flicker and ensure there is no increase in exceedances. The assessment will be undertaken in accordance with the DTP *Planning Guidelines for the Development of Wind Energy Facilities in Victoria*, and to the satisfaction of the responsible authority. Agreements must be entered into with the relevant landowner waiving the requirement to not exceed 30 hours per annum at a pre-existing dwelling. Agreements must be in a form that applies to the land comprising a pre-existing dwelling for the life of the wind energy facility, to the satisfaction of the responsible authority, and will be provided to the responsible authority upon request.	Wind farm site	Design	Chapter 12
MM-LV07	**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 *Policy and Planning Guidelines for the Development of Wind Energy Facilities in Victoria*, and to the satisfaction of the responsible authority.	Wind farm site	Design	Chapter 12
Air Quality				
MM-AQ01	**Dust suppression** A site-specific dust management plan (sub-plan of the CEMP) will identify potential and existing dust sources and outline best practice design controls and management practices to minimise dust. These measures will include, but not be limited to: • Watering of unsealed roads to reduce wheel generated dust. • Use of water sprays to reduce wind erosion from material stockpiles and exposed areas. • Restricting vehicle speeds to 20 kilometres per hours near sensitive areas such as dwellings. • Use of water sprays as required for material transfer operations and quarry activities (e.g., drilling rock, crushing and screening). • Site-specific dust control measures for dust producing activities. • Monitoring of forecast and real time local wind parameters (e.g., wind speed, wind direction) and adjustment of dust generating activities, as required, to reduce impact on sensitive receptors.	All areas	Construction Decommissioning	Chapter 13

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Sequencing of vegetation removal within the quarry work authority area where feasible to minimise the amount of disturbed land exposed to wind erosion. • Rehabilitation and revegetation of inactive stockpiles and disturbed areas to reduce wind erosion. • Implementation of a complaint investigation and response plan. • Contingency measures where dust plumes are identified during visual monitoring and/or the project receives dust related complaints. • Dust management training would be undertaken for construction workforce as part of the site-specific induction, outlining controls to be implemented during construction to manage potential air quality impacts. • Regular visual monitoring of dust, with results recorded in a dust management database. • Regular monitoring of the effectiveness of dust control measures. If dust controls are found to be ineffective, these would be reviewed (internally and / or by an external dust specialist, if required) and amended as necessary. Dust suppression will be used where construction or decommissioning activities occur in unpaved work areas, where there are spoil and aggregate stockpiles, and during the loading and unloading of dust generating materials, as required. Dust suppression methods may include water sprays, water carts or other devices and will be implemented in accordance with the applicable practices and systems identified in Environment Protection Authority Victoria Publication 1823: *Mining and quarrying – Guide to preventing harm to people and the environment.*			
MM-AQ02	**Vehicle movements** Vehicular movement will be restricted by keeping vehicles, plant and equipment within the construction footprint and on designated roads and tracks and in accordance with the applicable practices and systems identified in Environment Protection Authority Victoria Publication 1834*: Civil construction, building and demolition guide.*	All areas	Construction Operation Decommissioning	Chapter 13
MM-AQ03	**Vehicle movements on unsealed tracks** Crushed rock will be placed on unsealed access tracks where required and as agreed with relevant stakeholders, to prevent disturbance of exposed soil surfaces by moving vehicles and operating plant.	All areas	Construction Decommissioning	Chapter 13
MM-AQ04	**Vehicle speed limits** Vehicle speed limit will be restricted to 40 kilometre per hour (km/hr) on unsealed access tracks and 20 km/hr within 50 metres of the Glenelg Estuary and Discovery Bay Ramsar site.	All areas	Construction Decommissioning	Chapter 13

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-AQ05	**Transport of loads** Vehicles used for construction and decommissioning activities with the potential for loss of loads (such as dust or litter), will be covered when not being loaded or unloaded.	All areas	Construction Decommissioning	Chapter 13
MM-AQ06	**Weather monitoring** Weather conditions will be monitored for extreme heat and wind events (e.g. using systems such as Bureau of Meteorology forecasts), with construction and decommissioning works modified if conditions are likely to result in air quality impacts on sensitive receptors.	All areas	Construction Decommissioning	Chapter 13
MM-AQ07	**Dust monitoring** Dust emissions from vehicles will be observationally monitored along unsealed access tracks. If dust is observed to leave the construction footprint, works will be modified or stopped until the dust hazard is reduced to a manageable level.	All areas	Construction Decommissioning	Chapter 13
MM-AQ08	**Vehicle emissions and equipment maintenance** Vehicles will be fitted with appropriate emission control equipment, maintained frequently, and serviced in accordance with manufacturer specifications, to minimise vehicle exhaust emissions. Idling will be avoided where possible. Plant and equipment will be maintained in good condition to minimise spills and air emissions that may cause nuisance.	All areas	Construction Decommissioning	Chapter 13
MM-AQ09	**Odorous soils** In the event that odorous soils are uncovered during construction, the following measures will be implemented: • Cessation of ground disturbance works at the location and within the immediate vicinity. • Assessment of site contamination and determination of appropriate management actions in consultation with suitably qualified personnel. • Environment Protection Authority Victoria will be notified as soon as reasonably possible if odorous material is found to be contaminated. Refer to the mitigation measures for managing contaminated soils (mitigation measures MM-CA).	All areas	Construction	Chapter 13
Noise and vibration				
MM-NV01	**Construction Noise and Vibration Management Plan** Before commencement of development, a Construction Noise and Vibration Management Plan (CNVMP) will be prepared to address the effects of construction noise related to on-site activities and off-site traffic movements, and construction vibration associated with any activities expected to occur at less than 100 metres from a receiver.	All works	Pre-Construction	Chapter 14

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	The CNVMP will include: • A clear overview of the proposed construction program and demonstrate all reasonably practicable measures proposed to fulfil the general environmental duty under the Environment Protection Act 2017, accounting for guidance under Environment Protection Authority Victoria Publication 1834.1 Civil construction, building and demolition guide (EPA Publication 1834.1). A schedule of noise emission data for the major plant items to be used for construction of the Project, and a comparison of the data with the noise emission ranges set out in *AS 2436 Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites (Reconfirmed 2016)*. • Define all unavoidable work and low-noise managed-impact works which may occur outside of normal working hours, such as out of hours deliveries or turbine installation activities that are subject to weather constraints. • Details relating to proposed routing and timing of construction traffic, including protocols to minimise noise along local roads to the extent reasonably practicable. • Details of the measures to be implemented to address noise characteristics such as tonality, impulsive noise and low frequency noise, including consideration of residential receivers and noise levels in natural areas. • The proposed scheduling of any out of hours works, and provide evidence to support that low managed-impact works meet the criteria defined in EPA Publication 1834. • Identify specific activities which warrant notification of neighbouring residents in advance of the work occurring, such as unavoidable works outside of normal working hours and activities with potential to cause perceptible vibration. • Identify specific activities and construction stages which warrant notification of Parks Victoria of noise impacts on natural areas of state and national parks. The CNVMP will be prepared in consultation with Environment Protection Authority Victoria (EPA Victoria) and Parks Victoria. An EPA Victoria appointed independent environmental auditor (IEA) would be engaged to prepare a report verifying the CNVMP. Both the CNVMP and the IEA's verification report must be made available to EPA Victoria on request. Prior to decommissioning, a decommissioning noise and vibration management plan (DNVMP) would be prepared and submitted to the responsible authority for endorsement. This plan would include: • An assessment of the potential impacts of decommissioning noise and vibration from Project activities			

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Outline the proposed decommissioning program and how the proposed management controls are compliant with the requirements defined by EPA Victoria Publication 1834: Civil construction, building and demolition guide • Outline all unavoidable works, low-noise impact and managed-impact works that may occur outside normal working hours • Outline the proposed scheduling of any out of hours works to minimise noise and vibration impacts. • An EPA appointed IEA would be engaged to prepare a report verifying the DNVMP. Both the DNVMP and the IEA's verification report must be made available to EPA Victoria on request. The CNVMP must be submitted and approved by the Victorian Minister for Planning prior to development commencing.			
MM-NV02	**Concrete batching plant** All temporary concrete batching plants will be designed and operated in accordance with the general management measures in Environment Protection Authority Publication 1806 *Reducing risk in the premixed concrete industry* to minimise industrial noise emissions and not emit unreasonable noise. This includes not exceeding the noise limits set under the Part 5.3 Division 3 of Environment Protection Regulations 2021 (Vic) and the incorporated Noise Protocol (EPA publication 1826). Operations will minimise the risk of harm from noise emissions so far as reasonably practicable, consistent with the General Environmental Duty; and unreasonable noise, is not emitted having regard to the factors in part (a) of the definition of unreasonable noise in section 3(1) of the *Environment Protection Act 2017* (Vic)– this includes considering the risk associated with low frequency noise as assessed in the Noise guidelines: assessing low frequency noise (EPA publication 1997) (as amended or replaced from time to time).	Wind farm	Construction	Chapter 14
MM-NV03	**Quarry Work Plan** Before commencement of development, a Quarry Work Plan will be prepared in consultation with relevant authorities and endorsed as part of the Work Authority. The Quarry Work Plan will be generally consistent with the **Quarry Work Plan Requirements Report (Appendix W)** and will document all reasonable practical mitigation measures to be implemented for the purpose of fulfilling the general environmental duty under the *Environment Protection Act 2017* (Vic) (EP Act) and achieving the noise limits determined in accordance with the Noise Protocol. This will include: • Working hours, equipment noise controls and details of any perimeter screening if/where relevant.	Quarry	Pre-Construction Operation	Chapter 14

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Not exceeding the noise limits set under the Part 5.3 Division 3 of Environment Protection Regulations 2021 and the incorporated Noise Protocol (EPA publication 1826); minimise the risk of harm from noise emissions so far as reasonably practicable, consistent with the GED; and unreasonable noise, is not emitted having regard to the factors in part (a) of the definition of unreasonable noise in section 3(1) of the EP Act 2017 – this includes considering the risk associated with low frequency noise as assessed in the Noise guidelines: assessing low frequency noise (EPA publication 1997) (as amended or replaced from time to time).			
MM-NV04	**Pre-development noise assessment of ancillary infrastructure** Before development starts, a pre-development noise assessment is to be submitted to the Responsible Authority demonstrating that the related infrastructure associated with the wind farm is expected to achieve the noise limits determined in accordance with *EPA publication 1826.4 'Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues*, and it complies with the EP Regulations. The assessment will take account of reasonably practicable measures to fulfil the GED under the EP Act.	Wind farm	Pre-construction	Chapter 14
MM-NV05	**Construction wind turbine noise assessment** Prior to the commencement of construction, a pre-construction noise assessment would be completed and approved by the responsible authority. This assessment would be undertaken to assess the final project layout and equipment selection to ensure that the noise criteria are achieved at all non-stakeholder dwellings under all wind speeds prior to construction commencing. The pre-development noise assessment will be based on the final wind turbine layout, representative noise emission data for the final selected turbine model and the location of all receivers around the wind farm (existing or approved noise sensitive receivers at the date of the wind farm's approval). The pre-development noise assessment will identify all involved receivers where noise agreements have been established. The pre-development noise assessment will be prepared in accordance with the assessment and documentation requirements of NZS 6808. The pre-development noise assessment will be accompanied by a report prepared by an environmental auditor appointed under Part 8.3 the EP Act that verifies if the acoustic assessment undertaken for the purpose of the pre-development noise assessment has been conducted in accordance with the NZS 6808 Standard.	Wind farm	Pre-construction	Chapter 14

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-NV06	**Post-construction Noise Assessment** A post-construction noise assessment will be undertaken by a suitably qualified and experienced acoustic consultant to demonstrate operation of the Project is compliant with applicable noise limits. The assessment will be undertaken in accordance with the EP Regulations, and an Environment Protection Authority Victoria (EPA) appointed environmental auditor would be engaged to prepare a report verifying the assessment. Both the post-construction noise assessment and the auditor's verification report will be provided to the EPA within 10 days of the completion of the auditor's verification report.	Wind farm	Operation	Chapter 14
MM-NV07	**Noise Management Plan** Before development starts, a Noise Management Plan (NMP) will be prepared as required by regulation 131E of the EP Regulations. In addition to the requirements of regulation 131E, the NMP will also document: • a procedure for the preparation of annual statements in accordance with regulation 131F • a procedure for undertaking wind turbine noise monitoring in accordance with regulation 131G • a procedure for complaints management in accordance with regulation 131E(2(a)). • a schedule of sound power level testing which will be undertaken to verify that the emissions of the installed turbines are consistent with the findings presented in the pre-development noise assessment.	Wind farm	Pre-construction Operation	Chapter 14
MM-NV08	**Noise Monitoring** Regular wind turbine noise monitoring would be undertaken in accordance with regulation 131G of the Ep Regulations and as detailed in the Noise Management Plan.	Wind farm	Operation	Chapter 14
MM-NV09	**Annual Statement** Annual statements would be prepared annually in accordance with regulation 131F of the EP Regulations and as detailed in the Noise Management Plan.	Wind farm	Operation	Chapter 14
Transport				
MM-TP01	**Communications Plan** A Communications Plan will be developed and will contain consultation requirements relating to potential traffic and transport impacts for the lifetime of the Project. The plan will consider the findings from the **Transport Impact Assessment (Appendix P)** and subsequently the Traffic Management Plans (TMPs) (see mitigation measure MM-TP02).	All areas	All phases	Chapter 15

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	The plan will ensure construction, operations and decommissioning related information is shared with the local community, including updates on road closures, collaborating with other road users to negotiate road access and potential impacts, and ensuring the impact of construction on access to other infrastructure in communicated to affected stakeholders. This will include providing the Project schedule, anticipated traffic implications and the volume of construction activities. Aims of the plan include: • To proactively communicate the impact of activities that may lead to traffic disruption. • To provide a mechanism for collaborating with other road users to manage cumulative impacts on the region. Stakeholder consultation, including but not limited to the Victorian Department of Transport and Planning Glenelg Shire Council, Green Triangle Forest Products , Parks Victoria, the Victorian Department of Energy, Environment and Climate Action the Port of Portland (and any other ports to be used) and other freight industries where appropriate, will be undertaken to develop the plan. Key notifications and agreements may include: • Pre-construction stage: o TMP agreement o Dilapidation surveys. • Construction, operation and decommission or re-power stages: o TMP measures and controls o Construction traffic monitoring. o Road network monitoring, remediation protocols and maintenance requirements. • Prior to operation: o Construction close-out meeting. o Infrastructure hand-back criteria.			
MM-TP02	**Traffic Management Plans** Prior to the commencement of construction (excluding preparatory works), two Traffic Management Plans (TMPs) will be developed (one each for the wind farm and transmission line) and implemented to minimise disruption (to the extent practicable) to affected local landowners, traffic, car parking, on-road public transport, pedestrian and bicycle movements and existing public facilities during construction and maintenance activities. The TMPs will be developed in consultation with the relevant road management authorities and be informed and supported by an appropriate level of transport analysis. The TMPs will be developed against any relevant planning conditions and in association with key stakeholders for endorsement. Evidence of this endorsement will be documented within the TMPs.	All areas	All phases	Chapter 15

	Each TMP will include:
	• A review of relevant policy, regulatory and protocol requirements which have informed the TMP.
	• A review of existing conditions at the time of TMP development to verify conditions identified in the **Transport Impact Assessment (TIA) (Appendix P)**. Those provided as part of the TIA can be used as a baseline.
	• Approved Project scope, including finalised details on construction extents, staging, vehicle types, final material sources (e.g. quarry and concrete), and peak construction impacts (at this stage of the Project, unknowns are usually verified via multi-disciplinary assessments and when construction/transport contractors are onboarded).
	• Consideration of cumulative impacts of other major projects operating concurrently in the local area. such as the traffic movements associated with pine plantations located within the study area.
	• Verification of the site access strategy, including site access points (see mitigation measure MM-TP05).
	• Verification of the port(s) to be used for delivery of major wind turbine and transmission line components.
	• Final over-dimensional/Oversize overmass (OD/OSOM) route assessments completed by the nominated transport contractor (see mitigation measure MM-TP04).
	• Mitigation measures to be implemented, including site access point requirements (e.g. swept paths and Austroads intersection type requirements according to traffic demands) and any requirements for OD/OSOM delivery along transport routes. This would also identify road section upgrades required and the nature of the upgrade works.
	• Reinstatement commitments, including for table drains and verges that may be affected during construction and operational maintenance activities.
	• Design drawings for the above, which will be sent for review and agreement with the relevant road authorities during detailed design.
	• Road condition and maintenance requirements, such as:
	  ○ Dilapidation surveys to provide an existing survey of public roads that may be used for access and designated for construction vehicle routes.
	  ○ Consultation with road asset owners to agree on the extent and requirements of dilapidation surveys, road maintenance criteria, treatments and response timeframes, and post construction survey and asset hand-back agreements.
	  ○ Depending on stakeholder requirements, other considerations may include specific traffic monitoring (maximum daily truck volumes) and bond payments for remedial works.
	• Access requirements by vehicle type, including any regulator or stakeholder permits.			

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location

	• Road closure requirements for the management of any temporary or partial closure of roads and traffic lanes to maintain connectivity for local access, pedestrians and cyclists, in accordance with relevant road design standards and in consultation with landholders and any other relevant third parties. Traffic counts may be conducted to investigate suitable times for road and lane closures. Road closures will occur in off-peak periods when demands are low where possible (notably for OD/OSOM vehicle deliveries). The number and duration of road closures will be minimised.
	• Suitable measures to ensure emergency service access (notably for bushfire management) is not restricted due to Project construction or operation activities, especially regarding any road closures on the public road network and within Cobboboonee National Park and Forest Park. These measures will be agreed upon in consultation with emergency services and relevant road authorities including the Victorian Department of Energy, Environment and Climate Action.
	• Construction staging and car parking requirements to ensure no car parking occurs outside of the Project Area and affects local land use or accessibility. If required, car share or shuttle bus provisions will be considered to reduce the need for single vehicle worker occupancy.
	• Signage requirements with reference to Australian Standard series AS 1742. Notably for this Project this would include notification of:
	  ○ Movement of trucks from site access points to/from major road connections.
	  ○ No-truck access signage to ensure vehicles do not access restricted areas and to aid with wayfinding (notably to the Lower Glenelg National Park to the south of the wind farm site).
	• Speed limit reductions to be implemented during Project construction. A temporary reduced speed limit in the vicinity of site access points to 70 kilometres per hour is recommended which will allow safe intersection sight distance non-conforming site access points to be safer to utilise. This will be investigated further as part of the TMP in consultation with relevant stakeholders.
	• Confirmation of working hours during construction. These will need to be agreed with key stakeholders with a remit for the construction contractor to verify local and school bus routes/timings to ensure no conflicts occur.
	• Other environmental measures to be implemented, such as for dust/sedimentation and noise and vibration.
	• Monitoring, inspection and auditing requirements, including:
	  ○ Addendum TMP triggers.
	  ○ Monitoring and inspection protocols to ensure the integrity of the TMP given it will be viewed as a live document for the duration of the Project. Reviews are typically undertaken on a monthly basis with relevant stakeholders informed of any significant changes.			

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	○ Auditing can include compliance and road safety audits. Control measures provided in the TMPs will cover the following aspects: • Roles and responsibilities, including project management, co-ordination, public consultation, advertising and complaint procedures. • Road authority notification requirements. • Training and site induction requirements. • Contractor liaison protocol. Roadside native vegetation requirements, including identification protocols and approvals (if required).			
MM-TP03	**Road safety audits** Road safety audits (RSAs) will be undertaken at various stages of Project development in accordance with Austroads Guide to Road Safety Part 6: Road Safety Audit, such as: • Existing condition audit • Preliminary/functional design stage audit • Concept design stage • Detailed design stage. RSAs will be completed by accredited Victorian Department of Transport and Planning RSA auditor and be independent of the Project, particularly the design team.	All areas	Construction Decommissioning	Chapter 15
MM-TP04	**OD/OSOM transport route assessments** Formal over-dimensional/Oversize overmass transport route assessments will be completed by the transport contractor engaged by the Proponent. Impacts of the final routes can then be verified (e.g. removal/clearance of obstructions such as powerlines, structures (bridges and culverts), railway infrastructure and vegetation), and relevant stakeholders will be engaged to facilitate the safe delivery of materials to the construction sites. Prior to mobilising any over size and over mass vehicles from the Port of Portland to the project site, temporary infrastructure works must be designed in consultation with, and completed to the satisfaction of the Victorian Department of Transport and Planning (Regional Roads Victoria).	All areas	Construction	Chapter 15
MM-TP05	**Access strategy and design** A site access strategy will be developed and finalised following detailed design, in consultation with all stakeholders, particularly affected landowners. The strategy will consider traffic access and movement requirements and restrictions to local facilitates and amenities (such as tourism locations). The number of site access points to be used for construction of the wind farm may be investigated further to utilise internal access tracks and limit movements between the site and Portland-Nelson Road.	All areas	Construction	Chapter 15

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	Speed limits along Portland-Nelson Road and the Henty Highway in proximity to the Project site entrances will be reviewed during detailed design to verify the need to reduce speed limits to ensure that safe intersection sight distances can be achieved and the site can be accessed safely by construction vehicles. Site access gates would be designed and constructed in accordance with VicRoads Guideline Drawing GD4010 'Typical Access to Rural Properties' unless otherwise agreed by the relevant road authority. Once detailed design has been completed, the designs will be subject to Road Safety Audits, as described in mitigation measure MM-TP03. It is expected that stormwater drainage management systems including swale drains and pipe culverts may be required as part of any proposed intersection upgrade works, as there is currently no infrastructure in place to divert runoff near the site entrances. This will be reviewed as part of the detailed design process. See also mitigation measure MM-SW08.			
Socio-Economic				
MM-SE01	**Community Engagement Strategy** Implementation of an overarching Communications and Engagement Strategy to facilitate ongoing consultation between the proponent and the broader community. The strategy would: • provide an approach for ongoing engagement with the broader community about the long-term benefits and opportunities of the Project. • outline how the Proponent will maintain a stakeholder database throughout the life of the Project to assist identifying and resolving Project issues experienced by stakeholders efficiently, to put stakeholder ease of communication and issue resolution at the heart of stakeholder relations. • outline procedures and mechanisms for the regular distribution of accessible information about or relevant to the Project. • identify opportunities to provide timely, useful and accurate information regularly about construction activities, schedules and milestones. • include measures to notify affected landowners and neighbours well in advance about any specific construction issues with direct impacts on properties (e.g., traffic management, out-of-hours work) and how they can easily reach the Project team with questions. • detail the mechanisms for advising the community in advance of upcoming works (where necessary) and how the Proponent will work with community to mitigate the negative impacts from construction whenever possible.	All areas	All phases	Chapter 17

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• be reviewed and adapted based on community feedback so that the communications and engagement approach is fit for purpose and meets the needs of the community. The Proponent will continue to implement its Community Engagement Strategy to ensure consistent and consultative engagement with communities throughout the Project's planning, pre-construction, construction and operation phases. The strategy is critical for ensuring social acceptance, strong local partnerships and overall, more successful and sustainable Project outcomes.			
MM-SE02	**Shared Benefits Strategy** The Proponent will develop and implement a Shared Benefits Strategy that establishes an approach to proactively and purposefully share the rewards of the Project with local communities. The strategy will include three main components: 1. A dedicated Community Enhancement Plan, focused on the funding of wider community initiatives or programs in the form of sponsorships or grants at the local and regional level. 2. A Neighbours Benefit Plan, focussed on the needs and interests of the Project's closest neighbours. 3. An Aboriginal Participation Plan (refer to mitigation measure MM-SE05), to ensure that the impacts on the Gunditjmara community and the Gunditj Mirring Traditional Owners Aboriginal Corporation can be appropriately and formally responded to and prioritised.	All areas	All phases	Chapter 17
MM-SE03	**Local Participation and Social Procurement Strategy** The Local Participation and Social Procurement Strategy will directly address and respond to the social impacts and opportunities for the Project's construction workforce. The strategy will involve the development and implementation of initiatives that would proactively enable the maximisation of local employment and sourcing for the Project's construction and operational needs. The strategy will include: • A Local Employment, Procurement and Training Plan. • Actionable targets with associated responsibilities, including mechanisms to involve local stakeholders in the plan's development and implementation. • Requirements for the provision of information in the pre-construction phase relating to the Project's construction activities. • Mechanisms for local businesses, job seekers and services to register their capabilities and interest in working with the Project, to be widely shared within the study area.	All areas	Construction	Chapter 17

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	The strategy will aim to: • Employ local residents preferentially where they have the required skills and experience, and demonstrate a cultural fit with the organisation. • Purchase local non-labour inputs to production preferentially where local producers can be cost and quality competitive. Include a code of conduct for construction works with regard to behaviour in the contractor induction program.			
MM-SE04	**Workforce Accommodation Management Plan** A Workforce Accommodation Management Plan will be developed in consultation with the Glenelg Shire Council (GSC) and implemented to manage the incoming construction workforce required for construction of the Project. The plan will be dependent on the number of incoming workers and their staging and will therefore be developed in accordance with the Local Participation and Social Procurement Strategy (see mitigation measure MM-SE03). The Workforce Accommodation Management Plan will involve: • Engagement with relevant accommodation service providers, including caravan park providers. • Identification of measures to ensure there is sufficient accommodation for the Project workforce during all stages of development. • Consideration of cumulative impacts of workforce accommodation associated with other users, sectors/industries or development projects in the area. • Investigation of options for prioritising the employment of local workers. • Development of a program to monitor and review the effectiveness of the accommodation measures during construction and decommissioning. The following measures will be included in the Workforce Accommodation Management Plan: • Dispersion of workers across multiple locations/towns and across numerous providers. • Sourcing of long-term accommodation (with confirmation of long-term rates) as early as possible in the lead up to construction and decommissioning. • Consideration of the need for additional housing to support the influx of construction workers, for example through a temporary workers village or collaboration with local housing providers and local government. • Facilitation of an advertising campaign at the completion of the construction phase to encourage people to return to tourist accommodation. Information regarding employment and population level change will be provided early to GSC and relevant State Government agencies to facilitate early community infrastructure provision responses.	All areas	Construction	Chapter 17

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-SE05	**Aboriginal Participation Plan** The Proponent will develop and implement an Aboriginal Participation Plan which will aim to: • Work closely with the Gunditj Mirring and broader Gunditjmara community to better understand and respond to the Project's impacts and consequences on cultural values and Native Title rights holders of the Project Area and surrounds. • Provide strategies to enhance benefits to the broader Gunditjmara community and other Indigenous occupants of the social locality; develop targeted workforce, training and accommodation strategies (where suitable); and be supported by an Aboriginal engagement process. • To ensure comprehensiveness and a holistic understanding of cultural values in the region, the Plan will aim to encapsulate Gunditjmara interests and priorities, to most appropriately set mutually agreed arrangements for working together. This will capture the findings from the cultural values assessment prepared by Gunditjmara which has focused on engagement with Gunditjmara to understand the Gunditj Mirring (Country) of the Project Area and its cultural values. Refer also to the mitigation measures relating to the protection of cultural values (MM-AH).	All areas	All phases	Chapter 17
MM-SE06	**Complaint Investigation and Response Plan and Complaints Register** The Complaint Investigation and Response Plan will: • Respond to all aspects of the construction and operation of the wind energy facility. • Be prepared in accordance with AS/NZS 10002:2014 *Guidelines for complaint management in organisations.* • Include a process to investigate and resolve complaints (different processes may be required for different types of complaints). Before development starts, a Complaints Register will be established which records: • the complainant's name and address (if provided), including (for noise complaints) any applicable property reference • a receipt number for each complaint, which must be communicated to the complainant • the time and date of the incident, and the prevailing weather and operational conditions at the time of the incident • a description of the complainant's concerns, including (for a noise complaint) the potential occurrence of special audible characteristics • the process for investigating the complaint, and the outcome of the investigation, including the actions taken to resolve the complaint.	All areas	Construction Operation	Chapter 17

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Electromagnetic Interference				
MM-EI01	**Exclusion zones** Any turbines to be micro-sited will avoid the second Fresnel zone of the Telstra point-to-point link. If entering the exclusion zone is unavoidable during construction when lifting turbines into place, the link operator (e.g. Telstra) will be consulted before construction so they can anticipate the potential temporary service degradation and take steps to minimise or negate the impact on their services.	Wind farm	Planning Construction	Chapter 18
MM-EI02	**Pre and Post Construction Television and Radio Signal Assessments** The Proponent will undertake a pre- and post-construction assessment of the television reception strength at the location of any existing or approved dwellings as at the date of development approval that are within the orange scatter zone (where confirmed to not be using Viewer Access Satellite Television System) for the wind farm layout. The assessments will be undertaken by an independent television and radio monitoring specialist and include testing at locations to be determined by the television and radio monitoring specialist to enable the average television and radio reception strength to be determined. If the post-construction assessment establishes an unacceptable increase in interference to reception as a result of the wind farm, as determined by the independent television and radio monitoring specialist, measures to restore the affected reception to pre-construction quality will be undertaken.	Wind farm	Planning Construction Operation	Chapter 18
MM-EI03	**AM / FM radio narrowcast and broadcast** The Proponent will undertake a pre- and post-construction assessment of the radio reception strength at the location of any existing or approved dwellings as at the date of development approval that are within 5 kilometres of any turbine. The assessments will be undertaken by an independent television and radio monitoring specialist and include testing at locations to be determined by the television and radio monitoring specialist to enable the average television and radio reception strength to be determined. If the post-construction assessment establishes an unacceptable increase in interference to reception as a result of the wind farm, as determined by the independent television and radio monitoring specialist, measures to restore the affected reception to pre-construction quality will be undertaken.	Wind farm	Operation	Chapter 18
MM-EI04	**Meteorological radar** The Proponent will continue consultation with the Bureau of Meteorology on the exact terms of the operational limits and/or other technical solutions for the Project to ensure that the Mount Gambier radar can maintain operational efficiency.	Wind farm	Planning	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-EI05	**Defence radio system** The wind farm will conform with *AS/NZS 61000.6.4:2012 Electromagnetic compatibility (EMC) Generic standards* - Emission standard for industrial environments which means the wind farm will reduce, as much as is practicable, the emission of high frequency noise from the turbines, substation(s) and electronic control equipment.	Wind farm	Design	Chapter 18
Aeronautical				
MM-AI01	**Portland Aerodrome** The following amendments to the non-precision instrument approaches at Portland Aerodrome will need to be made for them to remain clear of the Project: • The 10 Nautical Miles (nm) and 25 nm Minimum Safe Altitudes need to be raised to 2,400 foot (ft). • The holding procedure altitude needs to be raised to 2,400 ft. • The missed approach procedures need to be raised to 2,400 ft. • Both the RWY08 and RWY26 runway approach paths need to be raised to commence at 2,400 ft. Consultation with the Portland Aerodrome operator (Glenelg Shire Council) and the Instrument Approach designer (Airservices Australia) has been undertaken to facilitate these amendments. The required amendments will need to occur prior to construction of the Project commencing.	Wind farm	Planning	Chapter 18
MM-AI02	**Air route lowest safe altitude** The Lowest Safe Altitudes (LSALT) for the Grid and W519 air routes will need to be raised from 2,200 foot (ft) to 2,400 ft. An application will be made to Airservices Australia to raise the LSALT for these two air routes before construction of the Project commences.	Wind farm	Planning	Chapter 18
MM-AI03	**Meteorological monitoring masts visibility** All met masts will be marked in accordance with the National Airports Safeguarding Framework – *Guideline D Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms) /Wind Monitoring Tower* to improve visibility as follows: • The top one third of the met mast will be painted in alternating contrasting bands of colour. • Marker balls, high visibility flags or high visibility sleeves will be placed on the outer guy wires. • The guy wire ground attachment points will have contrasting colours to the surrounding ground and vegetation.	Wind farm	Operation	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	All met masts will be notified to Airservices Australia in accordance with AC 139.E-01 v1.0. The location of the met masts will also be provided to the aerodrome operators at Portland and Nelson, Aerial Application Association of Australia, local aerial applications operators, Police Air Wing, Helicopter Emergency Medical Services (Ambulance Victoria), Forest Fire Management and the Country Fire Authority. A notice to airmen will also be issued that provides the height and location of the met masts.			
MM-AI04	**Wind turbine design** Wind turbine designs that have a conspicuous size and colour will be used to ensure visibility in the daytime.	Wind farm	Planning	Chapter 18
MM-AI05	**Reporting tall structures** The location of met masts, wind turbines and associated transmission line infrastructure will be reported to Airservices Australia in accordance with AC 139 E-01 v1.0. A Notice to Air Mission will also be issued that provides the height and location of the met masts, wind turbines and associated transmission line infrastructure	All areas	Operation	Chapter 18
Bushfire Risk				
MM-BF01	**Construction Emergency Management Plan** A Construction Emergency Management Plan will be prepared and implemented that includes procedures for managing the risk from bushfire during the construction phase. The Emergency Management Plan will be prepared in consultation with the Country Fire Authority (CFA) and the Victorian Department of Energy, Environment and Climate Action. At a minimum, the plan will: • Outline the procedures to be undertaken in accordance with different fire danger ratings. As a minimum, work will not be undertaken on days of extreme fire danger or higher, unless for emergency incident, repair or maintenance purposes. • Outline the induction and other training requirements for staff and contractors working at the site during the Fire Danger Period. • Include all the information contained within the CFA's *Design Guidelines and Model Requirements* for *Renewable Energy Facilities* (2022) pertaining to emergency management planning. • Be developed in accordance with AS 3745:2010 *Planning for emergencies in facilities*/ • Establish emergency assembly areas, emergency access points, and emergency evacuation procedures.	All areas	Construction	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BF02	**Fire risk communications** The following communication activities will be undertaken during construction to manage bushfire risk: • A communication system will be developed that operates during the Fire Danger Period which provides the ability to contact all onsite staff and contractors to inform them of bushfire alerts and warnings. • A fire watch position will be appointed at each construction location during the Fire Danger Period to monitor the surrounding area and regularly ensure hot work activity is being managed safely. • Local Country Fire Authority fire brigades will be engaged and offered regular Project familiarisation tours to support their understanding of the activities occurring. • A high standard of communication will be maintained with landowners, relevant stakeholders and the community (see mitigation measure MM-SE01). • A primary contact person will be established for the community to contact with concerns, questions, or issues about the Project during the construction period.	All areas	Construction	Chapter 18
MM-BF03	**Design and infrastructure** The following design and infrastructure requirements will be implemented during construction to manage bushfire risk: • Vegetation clearance and hardstand areas will be implemented prior to any works being undertaken at the location of each turbine and other infrastructure. • All facilities and infrastructure will be designed so as to not be exposed to more than 12.5 kW/m² of radiant heat. • Vegetation clearance will be provided around the base of the wind turbines within a 50 metre radius. • A static water supply will be established for each stage of construction in accordance with the Country Fire Authority's Design Guidelines and Model Requirements for Renewable Energy Facilities (2022). The water supply will be kept full during the Fire Danger Period. • All access roads and tracks will be identified and will meet the Country Fire Authority *Design Guidelines and Model Requirements for Renewable Energy Facilities* (2022) and Forest Fire Management Victoria Guidelines for emergency vehicle access. • Appropriate signs will be used to assist emergency response crews with determining track names, turbines locations etc. • A fire response capability will be developed in conjunction with the plantation companies and other relevant land managers that as a minimum includes tanks and firefighting pumps fitted to vehicles during the Fire Danger Period.	All areas	Design	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-BF04	**Fire Danger Period** All activities undertaken during the Fire Danger Period will be appropriate under the Country *Fire Authority Act 1958 (Vic)*, including: • Compliance with Total Fire Ban Day restrictions • Obtaining permits for any hot work activities.	All areas	Construction	Chapter 18
MM-BF05	**Operational Emergency Management Plan** An Operational Emergency Management Plan will be developed in consultation with Victorian Department of Energy, Environment and Climate Action, and will include: • For unmanned sites, appropriate monitoring and intervention measures will be provided to ensure that any shorts, faults, off-gassing, temperature increases above normal parameters and equipment failures with the potential to ignite or propagate fire are rapidly identified and controlled, and any off-gassing, smoke or fire is notified to 000 immediately. • Emergency procedures based on identified risks and hazards at the facility will be incorporated into the Emergency Management Plan, as per the Country Fire Authority *Design Guidelines and Model Requirements for Renewable Energy Facilities* (2022). Emergency procedures will include, but not be limited to: o Bushfire/grassfire. o Wind turbine faults and fire. o Electrical infrastructure faults and fire. o Other dangerous goods spills/leaks. • Procedures will incorporate activities prior to and during days of Catastrophic and Extreme fire danger rating and align with local planning including the Municipal Emergency Management Plan. • Procedures will be developed and implemented to identify and respond to the fire danger ratings/Total Fire Ban status during the declared Fire Danger Period. • Procedures will be developed and implemented for detecting and responding to bushfire activity within 50 kilometres of the Project (e.g., through the VicEmergency website or ABC local radio) including the ability to monitor for bushfire for at least three days in advance. • Non-essential personnel will have limited site access on days with a fire danger rating of Extreme or Catastrophic, and non-essential activities will be limited on these days. • Bushfire ignition hazards will be included in any Job Hazard Analysis or similar activity-based risk management process for site activities. • As a minimum, no work will be undertaken on Catastrophic days except in emergencies.	All areas	Operation	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Induction and other training requirements will be outlined in the Emergency Management Plan for staff and contractors working at the site during the Fire Danger Period. • Firefighting maintenance activities will not be undertaken in the cleared area surrounding the turbine towers under elevated fire danger conditions. • All the information contained within the CFA Design Guidelines and Model Requirements for Renewable Energy Facilities (2022) pertaining to emergency management planning will be incorporated into the Emergency Management Plan. • The Emergency Management Plan will be developed in accordance with AS 3745. • Emergency assembly areas will be established, and evacuation procedures and emergency access points will be detailed in the Emergency Management Plan to be covered in site inductions.			
MM-BF06	**Fire Management Plan** A Fire Management Plan (FMP) will be developed for the Project prior to construction and amended as required prior to operation. The FMP may form part of the broader Emergency Management Plan. The FMP will consider fire risks to and from the site and detail the control measures (systems, activities and accountabilities) for the prevention and management of fire. The FMP will include but not be limited to: • Monitoring for fire in the area. • Vegetation and fire break management. • Wind turbine monitoring and servicing. • Peat presence and management (see also mitigation measure MM-CA05). • Fire protection systems and equipment inspections and servicing. • Hot work permits/processes and other ignition control mechanisms. • Internal access roads, gates and fencing maintenance.	All areas	Construction Operation	Chapter 18
MM-BF07	**Operational design and infrastructure** The following design measures will be implemented during operation of the Project and are best placed in the Operational Management Plan: • Fire detection systems, in built fire protection and suppression systems, and remote alarming and notification systems will be installed in turbines to report potential bushfire risks. These systems will be connected to the supervisory control and data acquisition (SCADA) system that provides remove control over the wind farm. • Where possible, cameras will be installed on selected turbines to increase landscape situational awareness and provide early warning of bushfires.	All areas	Design	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
	• Remote shut down procedures will be implemented for turbine operations during bushfires or reported faults, or at the request of emergency services. • Lightning conductors will be installed to dissipate electricity to ground and reduce turbine damage and bushfire risk. • Suitable firefighting equipment will be available onsite or readily accessible (as per response plan). • Operator management vehicles will carry firefighting water and basic fire equipment during the declared Fire Danger Period. • Static water supplies will be installed at strategic locations across the Project Area with 45,000 litres installed in each set. • Where possible, non-combustible or low combustibility and low flammability liquids including oils and lubricants, will be used within the turbine nacelles.			
MM-BF08	**Operational maintenance** The following maintenance and audit activities will be undertaken during operation of the Project: • Regular inspections will be undertaken of all turbines, substations, and powerlines (including easements). Inspection details and findings will be recorded. • Bushfire preparedness audits will be developed and implemented to record all “annual” fire danger season preparedness activities and prevention works. • Asset protection zones around turbines and buildings will be maintained. • All access roads and tracks used for the Project will be maintained to meet industry standards for emergency vehicle access.	All areas	Operation	Chapter 18
MM-BF09	**Bushfire suppression operations** The following measures will be implemented to support integration with existing bushfire operations: • A response plan and suppression strategies will be developed to assist firefighters with understanding the risks associated with fires in turbines. • The Proponent will liaise with the local Country Fire Authority brigades and groups to assist with familiarising them with the Project’s operations and infrastructure. • A liaison person will be provided to support incident management during bushfires. • Turbines will be shut down in the vicinity of reported fires to support firefighting operations.	All areas	Operation	Chapter 18

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
Quarry Work Plan Requirements				
MM-QU01	**Quarry Supply** The onsite quarry is proposed to supply road base material required for the construction of the Project which would incorporate hardstand areas, construction pads, upgrades and extensions to the existing roading network. The quarry will only operate to supply material for the Project and will remain available for the life of the Project to supply any materials for ongoing road maintenance during operation. The quarry will be rehabilitated when the Project requirements for material has ceased.	Quarry	All phases	Appendix X
MM-QU02	**Imported Materials Management Plan** Imported material may be used at the quarry to assist in rehabilitation. Material would typically include soil or “clean fill” sourced from the construction activity within the Project Area. Importing of material will be undertaken in accordance with Environment Protection Authority regulations and guidance. All material imported to the quarry will be managed by an Imported Materials Management Plan. Solid inert waste and plastic concrete will not be accepted at the quarry.	Quarry	Rehabilitation	Appendix X
MM-QU03	**Site access** Appropriate signage at the quarry access point and adjacent to Portland-Nelson Road will be installed, as well as appropriate signage to the immediate Work Authority, warning the public of high cliff faces and fall hazards.	Quarry	Construction Operation	Appendix X
MM-QU04	**Waste** Domestic and industrial waste materials generated by the quarry will be removed by licenced contractors. Where required, waste will be disposed of at an appropriately licenced facility, or similar.	Quarry	Construction Operation	Appendix X
MM-QU05	**Site Closure and Rehabilitation Plan** A Site Closure and Rehabilitation Plan will be developed for the proposed quarry that address all the requirements under Part 2 the Mineral Resources (Sustainable Development) (Extractive Industries) Regulations 2019. The State Closure and Rehabilitation Plan will clearly state the rehabilitation objective(s) of the quarry and list the criteria and monitoring for determining the success or otherwise of rehabilitation. The rehabilitation objective will be to return the site to a landform that is safe, stable, non-polluting and sustainable as an ongoing source of plantation timber. The final landform design and all associated closure criteria and monitoring will reflect this objective.	Quarry	Rehabilitation	Appendix X

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-QU06	**Stockpile heights** Soil stockpiles would be limited in height to no greater than 2 metres and would be located at the edge of the disturbance area at a location close to extraction crests or the edge of hardstand areas where they would be ultimately used in rehabilitation. Soil stockpiles would be contoured, grassed and stabilised to manage erosion until they are required for use in rehabilitation. There would be no soil stockpiles post closure as all the soil would be used in rehabilitation. Overburden stockpiles would be limited in height to a maximum of 12 metres when located within the excavation, or 8 metres if placed on natural ground. As much as possible overburden would be placed in worked-out areas of the excavation and located to not impact the overall risk assessment of the Work Authority. Overburden stockpiles would have 1V:2H side slopes with a contour drain at the base of the dump to direct any runoff into the Work Authority drainage control system. Overburden stockpiles would be contoured and vegetated as required or otherwise stabilized to manage erosion. Product stockpiles would be located close to the mobile processing plant and have a maximum height of 10 metres. Soil and overburden stripping would be avoided on hot, dry, windy days, or as much as possible after extended dry periods where the inherent moisture content is very low, to minimise dust generation and potential air quality impacts.	Quarry	Construction Operation	Appendix X
MM-QU07	**Community Engagement Plan** A Community Engagement Plan (CEP) will be prepared as part of the Quarry Work Plan and will incorporate matters relating to the quarry to share relevant information about the Work Authority that may affect the community and key stakeholders. Key stakeholders for the Project quarry include the plantation owner (GTFP), Glenelg Shire Council, and ERR. Typical information that is shared includes any proposed changes in operating practices/activities that could potentially result in impacts on the local community. The CEP will be part of the final approved Work Plan for the quarry.	Quarry	All phases	Appendix X
MM-QU08	**Risk Treatment Plans** A detailed risk assessment and associated risk treatment plan addressing all the hazards on the site will be developed to the satisfaction of ERR before the quarry can be approved. The individual risk treatment plans required by the *Mineral Resources (Sustainable Development) Act 1990* (Vic) will identify specific sensitive receptors and discuss the impacts on these sensitive receptors and document the controls and provide monitoring and reporting requirements to mitigate these risks.	Quarry	Construction Operation	Appendix X

Measure ID	Mitigation Measure	Relevant Work Area	Phase	EES Location
MM-IA01	**Independent Environmental Auditor** An Independent Environmental Auditor (IEA) will be appointed to undertake environmental audits of compliance for the Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan, and Decommissioning Environmental Management Plan. The IEA audits the compliance with the mitigation Measures (MM) and the Incorporated Document prior to commencement, and during, project construction, to verify compliance with the Environmental Management Framework (EMF), the MMs, environmental management plans and approval requirements. This also includes investigations into trends in complaints, by topic or on a random basis. The key role and responsibility of the IEA is to: • Conduct audits of the Proponent and construction contractors to assess compliance with the CEMP, MMs, and other plans required by the EMF and the Incorporated Document during construction. • Prepare audit reports containing the results of the audit. ○ Review complaints which may highlight trends or non-conformance with applicable MMs.	All areas	Construction	Chapter 19

19.5 Environmental management documentation

The Proponent (and its contractors) will be responsible for preparing and implementing environmental management plans and other Project specific documentation to monitor and control environmental impacts during design, construction, operation, and decommissioning of the Project. The plans will be required to achieve compliance with relevant standards, guidelines and obligations under the Project's statutory approvals and consents and to reflect the MMs in **Table 19.3.**

The statutory approvals and consents required for the Project will be implemented through a series of plans that will be required as conditions of the planning authorisation. These are identified in the Incorporated Document at Appendix A of **Planning Scheme Amendment documents (Appendix Y).** Where applicable, the plans and procedures required by the Incorporated Document will be prepared to the satisfaction of the relevant responsible authority and in consultation with the identified relevant agencies and stakeholders, prior to works commencing. Any required amendments to these plans and procedures will be reviewed and approved in accordance with the requirements of the Incorporated Document and the EMF.

Contractors are required to address any non-compliances with these plans and report to the Proponent, who will be responsible for ensuring compliance and associated reporting to the relevant regulators as required. Audits and other reporting by the Independent Environmental Auditor will also inform the need for amendments or changes to address any non-compliances or address new or altered environmental risks arising from the construction and operation of the Project.

An overview of the key environmental documentation and their relationships is provided in **Figure 19.1**. The key environmental management documents which the Proponent and its contractors will prepare and implement are described in **Table 19.4**.

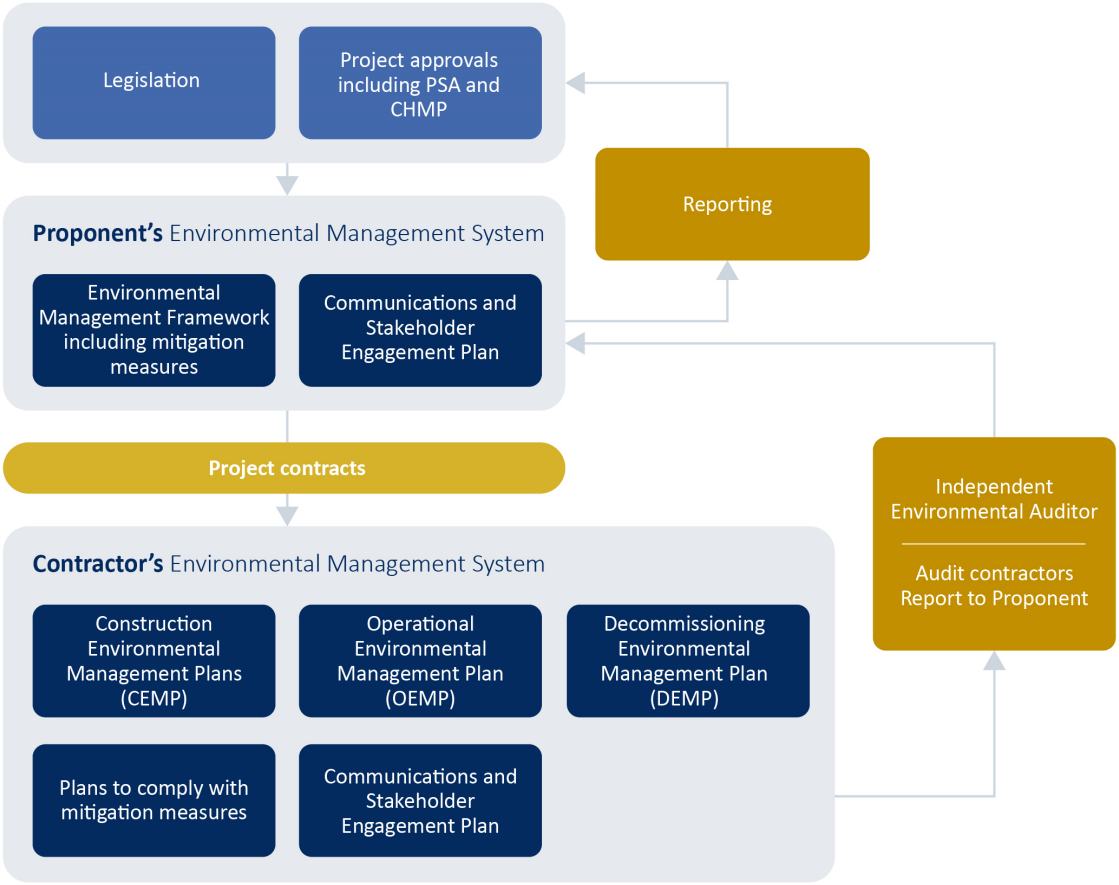

Figure 19.1 Key environmental management documentation

Table 19.4: Environmental management documentation

Key document	Description	Phase (in effect)
Minister's Assessment of the EES	The Minister's Assessment of the EES provides an assessment of the acceptability of the environmental effects of the project for statutory decision-makers under Victorian law, which must consider the assessment before deciding whether and how a project should proceed. The Minister's Assessment informs approval decisions under relevant Victorian and Commonwealth legislation.	Assessment
Incorporated document	The approval of the PSA will insert a Special Controls Overlay and an Incorporated Document into the Glenelg Planning Scheme. The Incorporated Document will set out the relevant conditions for planning and environmental compliance.	Approval
Development Plans	In accordance with Clause 7.1 of the draft Incorporated Document, prior to commencement of any buildings and works associated with the Project (, development plans will be submitted to and approved by the Minister. The plans will be fully dimensioned and drawn to scale and will include the matters referenced in Clause 7.1 of the draft Incorporated Document.	Pre-construction
Environmental Management Framework	The EMF outlines clear accountabilities for the delivery of the Project in accordance with the mitigation measures and compliance with relevant environmental laws, approvals, approval conditions, and environmental management plans and procedures. The proponent will update the EMF and mitigation measures in response to relevant matters and recommendations contained in the Minister for Planning's assessment of the EES. The EMF will be submitted to the Minister for Planning for approval in accordance with Clause 7.5 of the draft Incorporated Document.	Pre-Construction. Construction, Operation, Decommissioning
Construction Environmental Management Plan (CEMP)	The construction contractor(s) will prepare a CEMP for their package of works, as required by the project contract and in accordance with the EMF and MMs. The CEMP will include details of processes and responsibilities for: • Complying with conditions of approval, relevant legislation, construction-related mitigation measures and environmental components of the Project contract • Identifying, managing and monitoring environmental risks and issues during construction and implementing contingency measures • Using and maintaining plant, equipment, processes and systems to minimise risk of harm from pollution and waste • Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with construction • Communication and reporting during construction • Environmental reporting, monitoring and auditing requirements • Evaluating compliance with legislative and approval requirements, including mitigation measures • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements • Emergency preparedness and response • Review and continuous improvement.	Construction

Key document	Description	Phase (in effect)
	Contractors for the Project will be able to prepare one CEMP for their work or individual CEMPs for components of their works. The CEMP will also be able to be prepared in stages. Contractors may also choose to create a series of sub-plans for the CEMP. The CEMP will be prepared in consultation with stakeholders relevant to the works covered in the plan and as required by any relevant mitigation measure. *Note – not all plans required by the mitigation measures will be sub-plans to the CEMP. The structure of plans and sub-plans will be determined by the contractor to allow for an integrated approach to addressing and managing impacts across the various plans.*	
OEMP	The operator(s) responsible for commissioning and operation will develop and implement an OEMP, which would be prepared in accordance with the requirements of the EMF and MMs and address potential environmental impacts of commissioning, operation and maintenance activities associated with the Project. The OEMP will identify operational activities and contain procedures and responsibilities for: • Complying with operational mitigation measures, approval conditions, and relevant legislation • Identifying, managing and monitoring environmental risks and issues during operations and implementing contingency measures • Using and maintaining plant, equipment, processes, and systems to minimise risk of hard from pollution and waste • Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with operations • Communication and reporting during operation • Environmental reporting, monitoring and auditing requirements • Evaluating compliance with legislative and approval requirements, including mitigation measures • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements • Emergency preparedness and response • Review and continuous improvement. The OEMP will be prepared in consultation with agencies relevant to the operational works covered in the plan and as required by relevant mitigation measures.	Operation
DEMP	The operator will develop a Decommissioning Environmental Management Plan in accordance with the requirements of the EMF and MMs and to address potential environmental impacts of decommissioning activities associated with the Project. The DEMP will identify decommissioning activities and contain procedures and responsibilities for: • Complying with decommissioning mitigation measures, approval conditions, and relevant legislation • Identifying, managing and monitoring environmental risks and issues during decommissioning and implementing contingency measures • Using and maintaining plant, equipment, processes, and systems to minimise risk of hard from pollution and waste	Decommissioning

Key document	Description	Phase (in effect)
	• Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with decommissioning • Communication and reporting during decommissioning • Environmental reporting, monitoring and auditing requirements • Evaluating compliance with legislative and approval requirements, including mitigation measures • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements • Emergency preparedness and response • Review and continuous improvement. The DEMP will be prepared in consultation with agencies relevant to the decommissioning works covered in the plan and as required by relevant mitigation measures.	
Other plans as required by the mitigation measures	The mitigation measures (see **Section 19.4.3**) includes requirements to develop and implement management plans to avoid, minimise and mitigate potential impacts. Where appropriate, the management plans required by the mitigation measures may be included as sub-plans as part of the CEMP, OEMP, or DEMP, or may be included as stand-alone plans.	All phases
Community and Stakeholder Engagement Plan	A Community and Stakeholder Engagement Plan (CSEP) will be developed and implemented to facilitate ongoing engagement and communications between the Proponent, Project stakeholders, and the broader community throughout the lifetime of the Project. It will include detailed information on the engagement process, including methods of consultation and records of consultation undertaken. It will also detail the communications protocols between the Proponent and its contractors.	All phases
CHMP	Construction of the Project will be undertaken in accordance with the management conditions set out in CHMP 17822 to manage potential impacts on known and unknown Aboriginal places. This plan sits outside of the conditions of the Incorporated Document and is prepared by the Proponent to operate in conjunction with the approved management plans.	All phases

19.6 Environmental management system

The Proponent and its contractors will operate in accordance with their EMSs that are compliant with Australian and New Zealand Standard *AS/NZS ISO 14001*. The purpose of the EMS is to establish a plan-do-check-act system to identify and manage environmental risks and impacts and ensure comprehensive and integrated identification and management of environmental risks and issues throughout the Project's lifetime. The Proponent will review the effectiveness of the EMF for continuous improvement in accordance with its own EMS.

19.6.1 Change management

All contractor plans and documentation will be prepared and approved by the Proponent prior to any works commencing. Where required, contractor management plans will also be subject to regulatory approval from relevant government agencies. Documents will be developed, approved, implemented, and revised as necessary throughout the life of the Project. This may include amendments based on:

- Continuous improvement due to changes in design and work practices.
- Monitoring results.
- Changes to legislation.
- Risks, or as a result of findings from internal or external audits.
- Incidents.
- Complaints.
- Other compliance obligations voluntarily taken by the Proponent.

Contractors will be required to submit all major revisions of environmental documentation to the Proponent for review and approval. Major documentation revisions are considered to be changes that affect work and construction practices, roles and responsibilities, social and environmental risks and overall Project delivery. Changes to any management plans approved by the Minister will be required to be amended and re-submitted and approved by the Minister.

19.7 Evaluating performance and compliance

19.7.1 Compliance

A proactive compliance monitoring system will be implemented to measure ongoing environmental performance during construction, operation and decommissioning. Detailed monitoring requirements will be incorporated into the EMPs (CEMP, OEMP and DEMP) reflecting approval and regulatory requirements. Monitoring frequency and monitoring parameters will be informed by regulatory requirements and the scale of environmental risk. Monitoring will include periodic inspections of construction work areas and operational Project elements to ensure conditions of the Incorporated Document are being implemented and are effective in reducing environmental impacts as set by the EMF.

The Proponent will develop an audit plan, including an audit schedule and audit scopes for each Project contractor. Any non-compliances will be highlighted by the auditor and addressed accordingly by contractors.

The environmental compliance management system to be adopted for the Project may include the following:

- Defining non-conformances.
- Developing and maintaining a register of non-conformances.
- Defining responsibilities and timelines for addressing non-conformances.
- Monitoring, auditing and reporting requirements.

Monitoring results will be reviewed by the Proponent at regular intervals to enable early detection of potential non-compliances (with conditions of the Incorporated Document). This will help identify whether additional or modified monitoring activities are required to address Project risks.

19.7.2 Complaints management

The complaints management process will be implemented prior to construction commencing (other than preparatory works), consistent with *AS/NZS 10002: 2014 Guidelines for Complaint Management in Organisations* and approved by the Minister in accordance with proposed condition 5.63 of the Incorporated Document. The Proponent will aim to respond to comments and complaints in a timely and effective manner to ensure the values, priorities and issues of affected stakeholders are acknowledged and addressed (different processes may be required for different types of complaints).

A Complaint Investigation and Response Plan will be developed that:

- Outlines the process for making and recording complaints and their resolution.
- Provides a range of avenues (e.g. direct phone number, email) for community members to express their concerns or ask questions.
- Specifies response and resolution procedures to ensure timely responses are provided to any complaints raised.

A copy of the Complaints Investigation and Response Plan will be published on the Proponent's Project website and include details for a toll-free telephone number and email contact for complaints to be received. A complaints register will be established which records:

- the complainant's name and address (if provided), including (for noise complaints) any applicable property reference
- a receipt number for each complaint, which must be communicated to the complainant
- the time and date of the incident, and the prevailing weather and operational conditions at the time of the incident
- a description of the complainant's concerns, including (for a noise complaint) the potential occurrence of special audible characteristics
- the process for investigating the complaint, and the outcome of the investigation, including the actions taken to resolve the complaint.

A complete copy of the Complaints Register, along with a reference map of complaint locations must be provided to the Minister on each anniversary of the date of the Incorporated Document, and at other times on request by the Minister.

19.7.3 Auditing and reporting

Independent environmental audits will be conducted at regular intervals as specified within the relevant EMP, to monitor compliance of specific construction and operation related plans which includes the CEMP, OEMP, and DEMP. These independent environmental audits are an additional level of compliance monitoring proposed by the Proponent during the development and operation of the Project. The introduction of an independent environmental auditor as part of the environmental landscape of the Project is a relatively new approach to wind energy facility development and is anticipated to give communities and regulators confidence in environmental management.

This approach is becoming more commonplace in approved incorporated documents for large-scale infrastructure projects, particularly in major transport projects. Recently, this approach has been adopted and accepted by the Minister for the North East Link Project and Suburban Rail Loop East Project, Level Crossing Removal Projects and the Metro Rail Project. The use of an environmental auditor to audit and ensure compliance of a project of this scale is an efficient mechanism to enable construction to commence, provide certainty that the robust approvals conditions are being adopted, and ensure compliance is being independently assessed

At a minimum, audits will be conducted in accordance with the following:

- On a monthly basis during the construction phase (Contractor/Neoen Environment teams).
- Following a non-compliance event or reportable incident (a pollution incident that causes or threatens to cause 'material harm' to human health or the environment, defined by the EPA).
- Currency/adequacy of all environmental management documentation.
- Compliance and performance against EMF and MMs over the 12-month period.
- Corrective actions undertaken to meet EMF and MMs over the 12-month period.
- Stakeholder interactions and complaints handling over the 12-month period.
- Implementation of monitoring programs over the 12-month period.
- At the end of the construction phase.

Additional annual independent environmental audits will be undertaken throughout the Project's lifetime to report on:

- Documentation and record keeping of meeting minutes, incidents, non-conformances, CEMP, OEMP and DEMP audits over the 12-month period (as applicable).
- Summary of monthly audit meeting minutes/reports conducted over the 12-month period.
- Quality of the EMS against AS/NZS ISO 14001.

Conformance and compliance will be assessed through a range of mechanisms, including inspections, observations of Project works, consultation with the Proponent and its contractors, and reviews of records and meeting minutes, as agreed between the Proponent and the auditor. A register of non-compliances will be developed and maintained for internal use, with responsibilities and timelines for addressing non-compliances to be outlined to ensure they are being addressed. This register will not be publicly accessible and will only be provided to the relevant authority though reporting, upon request or when a reportable incident occurs.

Once the Project is operational, the Proponent will report on the Project's operational environmental performance against operation-specific MMs. Monthly meeting minutes and annual reporting of performance against MMs will be prepared for the purposes of provision to the technical expert to audit Project compliance, and subsequently maintained and archived for the operational life of the Project. An Independent review and update of all operational management plans and associated processes would be undertaken at a five-year frequency to ensure compliance with current legislation.

Decommissioning phase management plans would be prepared towards the end of the Project's operational life. Development of management plans and engagement with statutory authorities will be undertaken and be guided by the relevant legislation.

The Proponent will be responsible for reporting compliance to the relevant regulators. Reporting and external notification requirements will be outlined in detail within the EMPs including the identification of matters that require reporting, the authority to which the reports will be submitted, and the timeframe within which the reporting will occur.

The EMF and management plans will be treated as live documents that allow for continual improvement and adaptive management throughout the construction, operation and decommissioning phases of the Project. As such the EMF will be reviewed for its effectiveness when necessary based on changes to the Project, regulatory regime or as an action from auditing. This review shall generate actions for the continual improvement of the systems and supporting management plans through updates which will be done in consultation with the Minister.

Contingency measures in the management plans would facilitate adaptive management where required and adhere to the MMs identified in **Table 19.3**. There is potential for unexpected environmental events and incidents to occur during all phases of the Project. Contingency measures will facilitate an efficient and effective response to such events and will be developed and implemented to address these issues in line with relevant regulations, standards and industry best practice guidelines.

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