
Appendix H

Outline of a draft environmental management plan

Outline of a draft Environmental Management Plan

Gelliondale Wind Farm

29 April 2026



Outline of a draft Environmental Management Plan

Gelliondale Wind Farm

AE1289

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Abbreviations

Accent	Accent Environmental Pty Ltd
AREPL	Alberton Renewable Energy Pty Ltd.
ASRIS	Australian Soil Resource Information System
ASS	Acid Sulfate Soil
ASSMP	Acid Sulfate Soil Management Plan
BoM	Bureau of Meteorology
BPMG	Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils
CASS	Coastal Acid Sulfate Soil
CEMP	Construction Environmental Management Plan
CFA	Country Fire Authority
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEECA	Department of Energy, Environment and Climate Action of Victoria
EAO	Environmental Audit Overlay
EMS	environmental management system
EPA	Environment Protection Authority
EPC	Engineering Procurement & Construction Contractor
ESC	Erosion and Sediment Control
ESCP	Erosion and Sediment Control Plan
FTE	Fulltime equivalent
GED	General Environmental Duty
GHD	GHD Pty Ltd
GWF	Gelliondale Wind Farm
ha	hectares
IECA	International Erosion and Sediment Control Association
km	kilometres
kV	kilovolts
m	metres
mBGL	metres below ground level
mg/kg	milligrams per kilogram

mg/L	milligrams per litre
MW	megawatts
MWh	megawatt hours
NEPM	National Environmental Protection Measure
OEMP	Operations Environmental Management Plan
O&M	operation and maintenance
PASS	potential acid sulfate soils
PER	Public Environmental Report
PFAS	per- and polyfluoroalkyl substances
QA/QC	quality assurance and quality control
RWE	RWE Renewables Australia
SWMP	Soil and Water Management Plan
Synergy Wind	Synergy Wind Pty Ltd
The Project	Gelliondale Wind Farm (GWF) and associated infrastructure
WASS	Waste Acid Sulfate Soil
WTG	wind turbine generator

Terms and definitions

Action Area	The total area of all lots forming the Project Area, and all portions of crown land utilised for the Project’s vehicle access, underground cables and road upgrades (1,622 ha).
Project Area	The area covered by the Project Footprint, plus an additional 100 m buffer around each WTG and 25m buffer around all other Project infrastructure other than road upgrades (162 ha).
Project Footprint	The impact area of all development forming part of the Gelliondale Wind Farm, including vegetation removal and road upgrades along the turbine transport route (38.2 ha).

1 Introduction

1.1 Background

The Gelliondale Wind Farm (the Project) is a proposed wind energy facility located in Victoria, approximately 210 kilometres southeast of Melbourne, in South Gippsland, within the Wellington Shire. The Project proponent is Alberton Renewable Energy Pty Ltd, a subsidiary of Synergy Wind Pty Ltd.

The construction, operation and decommissioning of the Gelliondale Wind Farm has been declared a Controlled Action under the *Environmental Protection and Biodiversity Conservation Act 1997* (Cth), to be assessed through the preparation of a Public Environment Report (PER).

This Environmental Management Plan Outline (Plan) has been prepared to support the PER for the Project and should be read in conjunction with it. Specifically, this Plan addresses Section 9 (b) to (e) of the *Guidelines for the Content of a Draft Public Environment Report: Gelliondale Wind Farm Project, Gelliondale, Victoria (Reference: 2023/09577)* (PER Guidelines), issued by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

1.2 Objectives

Section 9 (b) to (e) of the PER Guidelines requires that:

- a. *A detailed outline of a draft Environmental Management Plan (EMP) that sets out the framework for management, mitigation and monitoring of relevant impacts of the action, including any provisions for independent environmental auditing.*
- b. *The EMP needs to address the project phases (construction, operation, decommission) separately. It must state the environmental objectives, performance criteria, monitoring, reporting, corrective action, responsibility and timing for each environmental issue.*
- c. *The EMP should also describe contingencies for events such as failure of sewerage systems, heavy or prolonged rainfall, or saltwater intrusion into ground water.*
- d. *The name of the agency responsible for endorsing or approving each mitigation measure or monitoring program.*

This Plan is not intended as an EMP for implementation purposes, nor as a stand-alone report, and therefore does not:

- describe the Project or its construction, operational and (if relevant) decommissioning components (a comprehensive Project description is provided within Section 4 of the PER).
- provide a detailed analysis of aspects and impacts associated with Matters of National Environmental Significance (this analysis is provided within Sections 6 to 8 of the PER).
- identify mitigation and management measures beyond those identified in the consolidated list of mitigation measures proposed to be undertaken to prevent,

minimise or compensate for the relevant impacts of the action as per the PER Guidelines Section 9a.

Once the Project is approved, subsequent construction, operation and (if relevant) decommissioning EMPs will be developed for implementation in line with this Plan.

2 Construction EMP outline

This section outlines the environmental management framework that will underpin the prevention or management of potential impacts on Matters of National Environmental Significant (MNES) that were identified for the Project construction and operations phase. This framework will inform the development and implementation of a Construction Environmental Management Plan (CEMP), Operations Environmental Management Plan (OEMP) and relevant sub-plans.

The relevant sub-plans will include at a minimum:

- Soil and Water Management Plan (SWMP): Please refer to **Section 2.3.6** for a description of management principles and objectives, performance criteria and monitoring as well as reporting measures aligned with best practice guidance and regulatory standards.
- Erosion and Sediment Control Management Plan (ESCP): Please refer to **Section 2.3.7** for a description of management principles and objectives, performance criteria and monitoring as well as reporting measures aligned with best practice guidance and regulatory standards.
- Acid Sulphate Soil Management Plan (ASSMP): Please refer to **Section 2.3.8** for a description of management principles and objectives, performance criteria and monitoring as well as reporting measures aligned with best practice guidance and regulatory standards.
- Weed/hygiene Plan: Please refer to **Section 2.3.10** for a description of management principles and objectives, performance criteria and monitoring as well as reporting measures aligned with best practice guidance and regulatory standards.

The CEMP and OEMP define the environmental management system and provides a management framework for effective application of the relevant sub-plans, which will be required to adopt all measures described within section 9 (a) i – v of the PER to prevent or manage potential impacts to MNES relevant to construction and operations works.

It should be noted that the management objectives, performance criteria, and associated measures described in Sections 2.3.1 to 2.3.11 and Sections 3.3.1 to 3.3.7 remain conceptual, reflecting the early stage of the project.

2.1 Environmental management system

Project construction works will be undertaken under the Engineering Procurement & Construction (EPC) contractor's environmental management system which, as a minimum, will comprise:

- A corporate policy which demonstrates a commitment to responsible environmental management.
- A corporate environmental management system currently certified to, or able to be certified to, AS14001:2015 (or later).

- Clearly defined roles and responsibilities for personnel regarding environmental management.
- Provision for the appropriate induction and training of personnel.
- Identification, allocation and maintenance of appropriate resourcing, being sufficient and suitably qualified environmental management personnel, to manage construction, operational and environmental risk in accordance with Approvals and Regulatory Requirements.
- Monitoring and auditing programs to assess compliance with procedures and the achievement of objectives.
- Provisions for continual review and improvement of environmental performance.
- A system of reporting for recording data and notification of relevant personnel.
- Processes for document and records management.

Alberton Renewable Energy Pty Ltd (Project proponent) will ensure that the successful contractor has robust systems in place for environmental management as part of the contractor selection process.

2.2 Roles and responsibilities

General roles and responsibilities relating to construction environmental management are described in Table 2.1. Responsibilities for monitoring, reporting and the implementation of corrective actions (if required) are identified within the management criteria and corrective action tables provided in Section 0.

Table 2.1 Project construction environmental responsibilities

Role	Responsibilities
Project proponent	• Ensure that final Project design is in line with that which was considered during environmental studies and regulatory assessments. • Ensure that all relevant approvals requirements: – Are communicated to construction contractors; – Are sufficiently addressed by construction tenders / bids; and – Are contractually binding. • Approve EPC contractor management plans prior to commencement of works to ensure that they achieve or exceed Project environmental objectives and Approval and Regulatory Requirements. • Undertake regular assurance activities, including auditing, to ensure that construction environmental management is being undertaken by the EPC contractor in line with Project standards.

Role	Responsibilities
EPC contractor	• Ensure that adequate processes, plans and procedures are in place to manage potential environmental impacts in line with Project standards. • Develop and maintain CEMPs, relevant sub-plans and all other plans as required to achieve Project construction environmental management requirements. • Develop and implement an environmental assurance program, maintain associated records, and initiate improvement actions as required. • Establish, monitor, maintain and audit effective environmental controls onsite. • Allocate sufficient resources for environmental management. • Respond to, report and investigate environmental incidents as appropriate and identify corrective actions to prevent recurrence. • Ensure that reportable environmental incidents are communicated to the Project proponent and the relevant regulatory authority. • Ensure that sufficient training is provided to construction personnel to achieve awareness of environmental management requirements. • Develop and implement site rehabilitation plans.

2.3 Management criteria for consideration in CEMP and relevant sub-plans

The following Sections 2.3.1 – 0 outline management criteria and monitoring measures, performance criteria and specific responsibilities to be adopted by the CEMP and relevant sub-plans for each of the potential impacts of the action during the Project construction phase.

2.3.1 Construction vehicle activity and speed limits

Construction vehicle activity in combination with vehicle speed are among the main drivers for a range of impacts, which can be easily avoided and/or managed through the strict adherence to standard industry-practices.

Examples of risk events that may be exacerbated by vehicle speed include:

- fauna collision
- dust generation
- accident whilst transporting hazardous substances causing release to the environment.

Therefore, strict adherence to signage, demarcations and to vehicle speed limits will be imposed on construction access tracks and lay down areas during the Project construction phase.

Speed limits will be determined based on risks associated with local conditions, prior to commencement of construction.

Vehicle speed limits established for environmental protection will be specified within the Project CEMP and relevant sub-plans. Signage identifying speed limits will be placed at the site entrance and other key locations

2.3.2 Habitat loss and fragmentation

Table 2.2 Management criteria for habitat loss and fragmentation

Item	Description	
Risk event and timing	Vegetation clearing from commencement of works and progressively throughout construction, finishing ahead of civil works.	
Objectives	Zero instances of vegetation clearing beyond the approved Project Footprint in accordance with permit conditions.	
Performance criteria	- All vegetation clearing is limited to the approved Project Footprint. - Vegetation clearing protocols are in place including appropriate demarcation and delineation measures to protect remnant vegetation. The CEMP provides clear reference to relevant sub-plans, in which these protocols are described in detail. - The construction schedule provides for sequential vegetation clearing and progressive rehabilitation. - Sequential vegetation clearing and progressive rehabilitation is undertaken as per the construction schedule. - Revegetation is undertaken as directed by appropriate vegetation rehabilitation plans.	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation (if required). - Monthly oversight (desktop) of vegetation clearing and revegetation works via review of contractor reports and use of available aerial photography or satellite imagery. - Minimum quarterly site inspections, to assess EPC contractor compliance with vegetation clearing restrictions and implementation of corrective actions identified to address non-conformances (if required).

Item	Description	
		Annual audits of construction Contractor environmental performance by a suitably experienced, independent auditor.
	EPC contractor	- Weekly monitoring of vegetation clearing underway, which specifically assesses adherence to vegetation clearing restrictions. - Weekly monitoring of rehabilitation works underway, to assess outcomes against rehabilitation plan objectives.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Any instances of over clearing are logged within incident management systems and reported to the Project proponent within 24 hours. - Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - State the total area of vegetation cleared during the reporting period. - Describe rehabilitation undertaken during the reporting period. - List all environmental incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence. - Provide progress updates regarding the implementation of corrective actions through to their completion.

Table 2.3 *Habitat loss and fragmentation corrective actions (if required)*

Trigger	Corrective action
Vegetation clearing extends beyond the	Stop work at that location.

Trigger	Corrective action
approved Project footprint or remnant vegetation is damaged.	- Physically mark the intended clearing extent or damaged vegetation. - Immediately stabilise disturbed soils. - Rehabilitate the disturbed area or damaged vegetation.
Vegetation clearing does not proceed sequentially or progressively.	Adjust vegetation clearing processes and timing to align with the proposed sequential and progressive clearing practices.
Progressive rehabilitation falls behind schedule.	- Stabilise disturbed soils and increase weed control effort within rehabilitation areas in the short term. - Take steps to prevent further disturbance of the area. - Increase rehabilitation effort to meet the schedule.

2.3.3 Physical interference with MNES fauna

Table 2.4 Management criteria for physical interference with MNES fauna

Item	Description	
Risk event and timing	- Vehicle impact from early works through to operations. - Vegetation clearing from early works and progressively throughout construction, finishing ahead of civil works. - Excavation throughout construction.	
Objectives	- Harm to MNES fauna is prevented. - In the event of impact, harm is managed and minimised through effective response.	
Performance criteria	- Pre-clearance fauna surveys are undertaken within all nominated areas. - All management measures and controls recommended by the relevant surveys and impact assessments are included in the CEMP and relevant sub-plans. - All management measures and controls are effectively implemented.	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. - Review of monthly reports provided by the EPC contractor. - Minimum quarterly site inspections, to assesses EPC contractor compliance with management measures identified to prevent physical harm to fauna.

Item	Description	
		Annual audits of EPC contractor environmental performance by a suitably experienced, independent auditor.
	EPC contractor	- Weekly monitoring of activities with the potential to cause physical harm to fauna to assess the implementation and effectiveness of control measures. - Daily to weekly review Of vehicle speeds, vegetation clearing protocols and the treatment of excavations by the construction Management Team whilst undertaking routine work.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Events involving physical harm to fauna caused by construction activities are logged within incident management systems and reported to the Project Owner within 24 hours. - Potential hazards to fauna identified by Project personnel throughout construction, that have not previously been addressed, are logged according to the hazard identification process in place. - Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - List new potential hazards to fauna identified during the reporting period and controls implemented to remove or mitigate the threat. - List all environmental incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence.

Item	Description
	– Provide progress updates regarding the implementation of corrective actions through to completion.

Table 2.5 Physical fauna interference corrective actions (if required)

Trigger	Corrective action
Pre-clearance surveys are not undertaken prior to commencement of vegetation works within MNES habitat.	• Stop work immediately and complete pre-clearance surveys. • Recommence work once surveys have been completed following direction provided by project ecologist.
Controls identified within management plans to prevent physical harm to fauna are not fully implemented.	• Adjust work practices to implement controls. • Ensure controls are adequately communicated to relevant personnel.
Harm to fauna occurs during vegetation clearing.	• Project ecologist to assess the animal, determine required treatment and transfer the individual to a vet or wildlife carer if required. • Review management controls for adequacy and adjust or introduce new controls to prevent recurrence.
Harm to fauna is caused by vehicle collision.	• Project ecologist to assess the animal, determine required treatment and transfer the individual to a vet or wildlife carer if required. • Assess speed limits, visibility, driver fatigue and other factors that may have led to the event and treat hazards as required to prevent recurrence.

2.3.4 Light, noise and vibrations

Table 2.6 Management criteria for light, noise and vibrations

Item	Description
Risk event and timing	• Lighting at site construction facilities from early works through to commissioning, most prominent during peak construction. • Vehicles, machinery and equipment throughout the construction period.
Objectives	• Avoid or minimise disturbance to MNES fauna caused by construction lighting, noise and vibrations.

Item	Description	
Performance criteria	- All relevant light, noise and vibration limits mandated by local laws and regulations are identified within the CEMP and abided. - All reasonable and practical measures to avoid or minimise impacts to MNES fauna caused by noise or light emissions, vibration are effectively implemented.	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. - Review of monthly reports provided by the EPC contractor. - Minimum quarterly site inspections, to assesses the implementation of controls identified to minimise light, noise and vibrations and the achievement of performance criteria. - Annual audits of Construction Contractor environmental performance by a suitably experienced, independent auditor.
	EPC contractor	- Monitoring of lighting at site facilities during housekeeping checks to identify light spill. - Random checks of vehicle and machinery maintenance logs during weekly environmental inspections. - Monthly to quarterly review of light usage and the generation of noise and vibrations by the construction Management Team whilst undertaking routine work.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Events involving the disturbance of fauna caused by light, noise and / or vibrations are logged within incident management systems and reported to the Project proponent within 24 hours. - Monthly reports are submitted to the Project proponent which:

Item	Description
	- Communicate the findings of weekly monitoring undertaken. - List all environmental incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence. - Provide progress updates regarding the implementation of corrective actions through to completion.

Table 2.7 Light, noise and vibrations corrective actions (if required)

Trigger	Corrective action
Construction noise and / or vibrations exceed acceptable thresholds	Undertake maintenance of plant or revise construction method to comply with thresholds.
Light spill beyond specific areas where required for safety is identified during housekeeping inspections.	Redirect lights or install light shields as appropriate to limit light to required areas.

2.3.5 Dust

Dust minimisation and suppression techniques applied during construction will comprise the application of water, soil binders and the reduction of vehicle speeds within dust prone areas as a minimum. Dust generating activities may also be limited during windy conditions where suppression techniques are insufficient to prevent harm to MNES. The implementation of dust controls will be as described in CEMP and relevant sub-plans.

Table 2.8 Management criteria for dust

Item	Description
Risk event and timing	- Vehicle movement from early works through to completion of construction. - Earthworks throughout construction.
Objectives	Avoid or minimise dust emission.
Performance criteria	- All vehicles abide by nominated speed limits at all times. - Land clearing restrictions and site rehabilitation timeframes are met.

Item	Description	
	Dust emission is avoided or minimised through appropriate management measures and controls including the application of watering regimes and soil binders (as required).	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. - Review of monthly reports provided by the EPC contractor. - Minimum quarterly site inspections, to assesses the implementation and effectiveness of dust controls. - Annual audits of EPC contractor environmental performance by a suitably experienced, independent auditor.
	EPC contractor	- Monitoring of dust generation during weekly environmental inspections. - In addition, monitoring of dust generation and vehicle speeds by the construction Management Team whilst traversing the wind farm for routine work.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Events involving harm to flora and / or fauna due to excessive dust are logged within incident management systems and reported to the Project proponent within 24 hours. - Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - List all environmental incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence.

Item	Description
	Provide progress updates regarding the implementation of corrective actions through to completion.

Table 2.9 Dust corrective actions (if required)

Trigger	Corrective action
Dust generation resulting in visible or suspected impacts to MNES.	- Increase use of dust suppressants such as water and / or soil binders. - Review speed limits on construction access tracks and reduce if beneficial for reducing dust.

2.3.6 Soil and water management

Soil and water management measures will be implemented to avoid or minimise impacts to MNES, including downstream aquatic environments, wetlands, drainage lines, and associated ecological values within and surrounding the project area.

All measures will be developed and implemented in accordance, as relevant, with the following guidelines and standards (or their most current versions):

- DCCEEW (2024) Environmental Management Plan Guidelines
- International Erosion and Sediment Control Association (IECA) Australasia Best Practice Erosion and Sediment Control (BPESC) Manual 2008
- Environmental Reference Standard under the EP Act 2017
- Environmental Protection Authority (EPA) Victoria (2025) Implementing the general environmental duty for licence holders.
- Department of Energy, Environment and Climate Action of Victoria (DEECA) (formerly DSE) (2010) Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils
- EPA Victoria (2009) Information bulletin acid sulfate soil and rock

Management measures will be based on the following principles:

- Minimising the extent and duration of soil disturbance across turbine pads, crane hardstands, access tracks, and underground cable routes.
- Progressive rehabilitation and stabilisation of disturbed areas, particularly along linear infrastructure such as access tracks and cable trenches.
- Installation and maintenance of erosion and sediment controls prior to and during works, with consideration of dispersed work fronts.
- Appropriate management of stockpiles, borrow areas, drainage, and runoff across multiple turbine locations.

- Avoidance or appropriate management of Acid Sulfate Soils (ASS), where encountered.
- Design and management of site drainage to minimise impact risk from altered surface flows (if any) associated with access tracks, hardstand areas and other project infrastructure.

Weather conditions will be monitored daily to inform construction planning and risk management across the wind farm footprint. This will include:

- Regular review of Bureau of Meteorology (BoM) forecasts, warnings, and climate outlooks.
- Identification of potential extreme rainfall events, high winds, or prolonged wet periods that may affect exposed areas or access tracks.

Where forecast conditions indicate an increased risk of erosion, sediment transport, or site instability, the following measures will be implemented:

- Adjustment or postponement of high-risk earthworks (e.g. turbine foundation excavation, trenching).
- Installation of additional or enhanced erosion and sediment controls at turbine work areas and along access tracks.
- Securing and stabilising exposed soils, batters, and stockpiles.
- Ensuring drainage systems, cross-drains, and table drains are functional and have adequate capacity.
- Increased inspection and maintenance frequency of controls across all active work areas.

In addition, pre-construction, mid-construction and post-construction water quality monitoring will be undertaken in the Albert River downstream of the project disturbance area, as near as practicable to Corner Inlet, as outlined in Table 2.10.

These measures will be undertaken to minimise and control off-site sediment discharge, protect water quality, and minimise the risk of impacts to sensitive receptors.

Table 2.10 Management criteria for soil and water management

Item	Description
Risk event and timing	• Earthworks associated with turbine foundations, crane pads, access tracks, and underground cabling during construction. • Vehicle and plant movement across larger, distributed work areas. • Stockpiling and material handling at turbine locations and temporary laydown areas. • Stormwater runoff and altered drainage patterns due to track and hardstand construction. • Dewatering activities (e.g. turbine footing excavations) during construction, if required.

Item	Description	
		Subsurface disturbance with potential for ASS during construction, particularly in low-lying or coastal areas.
Objectives		- Prevent impacts from sediment, nutrient, and contaminant discharge to watercourses, wetlands, and drainage lines. - Maintain stability of disturbed areas and minimise erosion. - Protect surface water and groundwater quality. - Avoid, minimise and appropriately manage disturbance of ASS. - Achieve compliance with Victorian and Commonwealth environmental legislation, approvals, and best practice guidelines.
Performance criteria		- Erosion and sediment controls comply with: - DEECA/DTP (formerly DSE) guidelines (latest version) - IECA BPESC guidelines (latest version). - No visible off-site sediment plumes or deposition in waterways, wetlands or drainage lines. - All disturbed areas (including tracks and turbine pads) are stabilised progressively and as soon as practicable. - Erosion and sediment controls are installed prior to disturbance and maintained in effective working condition. - No unauthorised discharge of contaminated water, including sediment-laden or potentially acidic water. - ASS (if encountered) are managed in accordance with DEECA Best Practice Guidelines for Assessing and Managing Coastal ASS, including the avoidance, minimal exposure and rapid reburial (as required).
Monitoring	Water quality monitoring	Undertake water quality monitoring for parameters including pH, dissolved oxygen, salinity, turbidity and total suspended sediments will be undertaken pre-construction, mid-construction and post-construction at a location on the Albert River. The location will be at an accessible point downstream of the project disturbance area, as near as practicable to Corner Inlet.
	Project proponent	- Commission pre-construction, mid-construction and post-construction water quality monitoring in the Albert River. - Review incident reports and corrective actions provided by the EPC contractor. - Review monthly environmental reports.

Item	Description	
		• Undertake minimum quarterly site inspections to assess effectiveness of soil, water, and ASS controls. • Undertake annual independent environmental audits.
	EPC contractor	• Routine inspection of erosion, sediment, drainage, and ASS controls (minimum weekly and after rainfall events). • Pre- and post-rainfall event inspections (e.g. >10 mm in 24 hours or as defined in ESCP). • Monitoring of dewatering activities and discharge quality (if applicable). • Opportunistic inspections by site personnel. • Inspection and maintenance in accordance with approved ESCP. • Visual and field-based checks for ASS indicators (e.g. staining, pH where relevant).
Reporting	Project proponent	• Regulatory reporting in accordance with legislative requirements and approval conditions.
	EPC contractor	• Regulatory reporting as required and agreed with the project proponent. • Notify the project proponent of any environmental incidents within 24 hours. • Maintain incident and corrective action register. • Monthly reporting to include: – results of routine and event-based monitoring – summary of inspections and maintenance activities – details of incidents and non-conformances – root cause analysis and corrective actions – status of corrective action close-out.
Contingencies	Project proponent	• Ensure notifiable incidents are reported to regulators (as required).

Item	Description	
(Trigger events may include: failure or overtopping of erosion and sediment controls heavy or prolonged rainfall events unexpected groundwater inflows or dewatering requirements discovery of ASS or acidic water/soil conditions failure of sewerage or containment systems.)		Oversee implementation of corrective actions.
	EPC contractor	- Cease works in affected area and stabilise site. - Repair or upgrade erosion and sediment controls immediately. - Install additional controls (e.g. diversion drains, sediment basins, bunding) as required. - Pump and manage water from excavations in accordance with environmental requirements (e.g. sediment control, off-site disposal if required). - If ASS or acidic water is identified: - isolate affected material - minimise exposure - implement neutralisation (e.g. lime) if directed - seek advice from Environmental Representative - manage sewerage failures via pump-out and licensed disposal - prevent impacts from discharge of untreated or contaminated water to the environment.

Table 2.11 Soil and water management corrective actions (if required)

Trigger	Corrective action
One-off sediment release due to inadequate or poorly positioned ESC.	- Immediately cease works in the affected area where safe to do so. - Contain and prevent further impacts from off-site sediment migration (e.g. install additional sediment barriers, bunding). - Clean up affected areas where practicable without causing further disturbance. - Adjust, repair or replace ESC controls immediately. - Review and update ESCP as required to meet ESC objectives. - Increase inspection frequency until controls are proven effective.

Trigger	Corrective action
Continued sediment releases over consecutive rainfall events.	• Immediately seek advice from a Certified Professional in Erosion and Sediment Control (CPESC). • Install additional or upgraded erosion, drainage and sediment controls as an interim measure. • Review site drainage design and sequencing of works. • Revise ESCP and implement improved controls as advised. • Undertake targeted training/toolbox talks with site personnel. • Increase monitoring and reporting frequency until compliance is achieved.
Failure, overtopping or damage of ESC controls following rainfall event	• Repair or reinstate controls as soon as practicable. • Install additional capacity (e.g. larger basins, diversion drains) if required. • Stabilise contributing catchments (e.g. mulching, covering, temporary seeding). • Inspect all controls across site for similar vulnerabilities. • Update ESCP if deficiencies are identified.
Heavy or prolonged rainfall forecast (proactive trigger)	• Inspect and reinforce all ESC controls prior to rainfall. • Stabilise exposed soils and secure stockpiles. • Install additional contingency controls in high-risk areas. • Cease or defer high-risk earthworks where practicable. • Ensure adequate drainage and sediment storage capacity is available.
Sediment-laden water or turbid discharge observed leaving site	• Immediately stop discharge where possible. • Contain and divert flows to sediment controls (e.g. basins, traps). • Install additional treatment measures if required (e.g. flocculation where approved). • Investigate source and implement corrective actions. • Notify project proponent and record incident.
Unexpected groundwater ingress or dewatering required	• Stop works and assess water quality. • Implement appropriate water management (e.g. sediment settlement, treatment, controlled discharge). • Avoid direct discharge to waterways unless compliant. • Update ESCP and/or water management procedures. • Seek specialist advice if required.
Identification of potential ASS or acidic water	• Cease works in the affected area. • Isolate and minimise exposure of affected soils. • Undertake field testing (e.g. pH) as directed by Environmental Representative.

Trigger	Corrective action
	• Implement ASSMP measures (e.g. reburial, neutralisation if required). • Seek advice from a suitably qualified specialist. • Update management plans if required.
Failure of sewerage or containment systems	• Isolate and contain any spill or leak. • Arrange immediate pump-out and removal by licensed contractor. • Prevent discharge to surrounding land or waterways. • Clean up and remediate affected area. • Report incident in accordance with regulatory requirements.
Repeated non-conformance with ESCP or monitoring requirements	• Conduct root cause analysis. • Review construction methodology and sequencing. • Retrain relevant personnel. • Increase supervision and inspection frequency. • Update ESCP and management procedures. • Escalate to project proponent and consider independent audit.

2.3.7 Erosion and sediment control

Erosion and sediment control measures will be implemented to avoid or minimise sediment mobilisation and off-site discharge associated with construction, including turbine pads, crane hardstands, access tracks, cable trenches, laydown areas, and other temporary disturbance areas. Measures will be designed to protect the project area, downstream uses and adjacent lines, drainage lines, waterways, wetlands, farm dams, MNES and other sensitive receptors.

All measures will be developed and implemented in accordance with the following guidelines and standards, or their current equivalents:

- EPA Victoria (2020) Working within or adjacent to waterways (and related EPA erosion and sediment control guidance)
- IECA Australasia BPESC principles
- Project-specific and location-specific ESCP drawings, design and inspection requirements
- Any approval conditions and relevant Victorian statutory obligations.

Management measures will be based on the following principles:

- Minimising the extent and duration of exposed soil.
- Staging works to reduce open disturbance at any one time.
- Installing erosion and sediment controls prior to disturbance.
- Separating clean water from dirty water where practicable.
- Managing runoff from access tracks, hardstands, turbine pads and trench lines to reduce scour and sediment transport.
- Protecting stockpiles and stabilising disturbed surfaces progressively.
- Inspecting, maintaining and adapting controls in response to weather and site conditions.
- Rehabilitating and stabilising disturbed areas as soon as practicable.

Weather conditions will be monitored daily to inform construction planning and erosion and sediment control across the wind farm footprint. This will include review of Bureau of Meteorology forecasts, warnings, and rainfall outlooks, with particular attention to forecast rainfall that could affect exposed areas, stockpiles, drainage controls and access tracks.

Where forecast conditions indicate increased erosion or sediment transport risk, the following measures will be implemented as appropriate:

- Postponement or resequencing of high-risk earthworks.
- Installation of additional or enhanced diversion and sediment controls.
- Stabilisation or covering of exposed soils and stockpiles.
- Inspection and cleaning of track drainage, check structures and sediment controls.
- Increased inspection and maintenance frequency before and after rainfall events.

These measures will be undertaken to minimise and control off-site sediment discharge, reduce turbidity risks in receiving waters, and maintain effective control of runoff from dispersed work areas.

Table 2.12 Management criteria for soil erosion and sedimentation

Item	Description
Risk event and timing	• Clearing, grubbing, stripping, excavation, trenching and foundation works during construction. • Vehicle and plant movement on unsealed surfaces, particularly along access tracks and around turbine work areas. • Stockpiling and movement of topsoil, subsoil and construction materials. • Concentrated runoff from batters, hardstands, track drains and temporary drainage lines. • Rainfall events affecting exposed areas.
Objectives	• Prevent erosion and minimise sediment generation at the source.

Item	Description	
		• Prevent sediment-laden runoff from leaving active disturbance areas. • Protect waterways, wetlands, farm dams, drainage lines and downslope land from sediment deposition. • Maintain stable site access and drainage during construction. • Achieve compliance with Victorian environmental obligations, approval conditions and best practice ESC requirements.
Performance criteria		• ESC controls are installed before relevant ground disturbance begins. • No visible off-site sediment plumes, sediment deposition, or turbid discharge attributable to construction activities. • Disturbed areas are progressively stabilised as soon as practicable. • Drainage controls remain functional and are maintained in effective working order. • Sediment controls have sufficient capacity for site conditions and are repaired or upgraded when required. • Access tracks, batters, spoil areas and stockpiles are managed to minimise erosion and sediment transport.
Monitoring	Water quality monitoring	• Undertake water quality monitoring in the Albert River, as outlined in Table 2.10.
	Project proponent	• Commission pre-construction, mid-construction and post-construction water quality monitoring in the Albert River. • Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. • Review of monthly reports provided by the EPC contractor. • Minimum quarterly site inspections of representative work areas, including turbine pads, access tracks and cable trench areas, to assess the implementation and effectiveness of soil erosion and sediment controls. • Annual audits of construction Contractor environmental performance by a suitably experienced, independent auditor.

Item	Description	
	EPC contractor	- Inspect ESC controls routinely across all active work areas, at minimum weekly and after significant rainfall events. - Undertake pre-rainfall and post-rainfall event inspections for high-risk areas. - Weekly inspection of exposed batters, table drains, cross-drainage points, stockpiles, sediment fences, check dams, sediment basins and stabilised entry/exit points. - Record maintenance needs and complete corrective actions within defined timeframes. - In addition to the above, undertake inspections by site personnel during active works.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Failures to meet ESCP objectives are logged within incident management systems and reported to the Project proponent within 24 hours. - Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - List incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence. - Provide progress updates regarding the implementation of corrective actions through to completion.
Contingencies (Trigger events may include:	Project proponent	- Ensure notifiable incidents are reported to regulators (as required). - Oversee implementation of corrective actions.

Item	Description	
• failure, overtopping or damage to ESC controls • forecast heavy rainfall or prolonged wet conditions • visible sediment movement beyond work areas • turbid or sediment-laden water leaving the site • recurring erosion at track drains, batters, trench lines or disturbed slopes.)	EPC contractor	• Cease or restrict works in affected areas where safe and practicable. • Contain runoff and prevent impacts from further sediment migration. • Repair, replace or upgrade failed controls immediately. • Install additional diversion, drainage or sediment controls where needed. • Stabilise exposed surfaces using appropriate temporary or permanent measures. • Review and update ESCP measures and sequencing where recurring issues are identified. • Escalate persistent issues for specialist ESC review where required.

Table 2.13 Soil erosion and sedimentation corrective actions (if required)

Trigger	Corrective action
One-off sediment release due to inadequate or poorly positioned ESC controls	• Immediately cease works in the affected area where safe to do so. • Contain and prevent impacts from further off-site sediment migration (e.g. install additional sediment barriers, bunding). • Clean up affected areas where practicable without causing further disturbance. • Adjust, repair or replace ESC controls immediately. • Review and update ESCP as required to meet ESC objectives. • Increase inspection frequency until controls are proven effective.
Continued sediment releases over consecutive rainfall events	• Immediately seek advice from a CPESC. • Install additional or upgraded erosion, drainage and sediment controls as an interim measure. • Review site drainage design and sequencing of works. • Revise ESCP and implement improved controls as advised. • Undertake targeted training/toolbox talks with site personnel. • Increase monitoring and reporting frequency until compliance is achieved.
Failure, overtopping or damage of ESC controls following rainfall event	• Repair or reinstate controls as soon as practicable. • Install additional capacity (e.g. larger basins, diversion drains) if required.

Trigger	Corrective action
	- Stabilise contributing catchments (e.g. mulching, covering, temporary seeding). - Inspect all controls across site for similar vulnerabilities. - Update ESCP if deficiencies are identified.
Heavy or prolonged rainfall forecast (proactive trigger)	- Inspect and reinforce all ESC controls prior to rainfall. - Stabilise exposed soils and secure stockpiles. - Install additional contingency controls in high-risk areas. - Cease or defer high-risk earthworks where practicable. - Ensure adequate drainage and sediment storage capacity is available.
Sediment-laden water or turbid discharge observed leaving site	- Immediately stop discharge where possible. - Contain and divert flows to sediment controls (e.g. basins, traps). - Install additional treatment measures if required (e.g. flocculation where approved). - Investigate source and implement corrective actions. - Notify Project proponent and record incident.
Repeated non-conformance with ESCP or monitoring requirements	- Conduct root cause analysis. - Review construction methodology and sequencing. - Retrain relevant personnel. - Increase supervision and inspection frequency. - Update ESCP and management procedures. - Escalate to Project proponent and consider independent audit.

2.3.8 Acid sulfate soils

Acid sulfate soil management measures will be implemented to avoid or minimise environmental impacts associated with the disturbance of ASS and any associated acidic water encountered during construction, including the construction of turbine foundations, crane hardstands, access tracks, underground cable trenches, drainage works and other excavation areas. Measures will be designed to protect surrounding soils, drainage lines, waterways, wetlands, farm dams and groundwater from acid generation, acid drainage and mobilisation of metals.

All measures will be developed and implemented in accordance with the following guidelines and standards, or their current equivalents:

- DEECA (formerly DSE) (2010) Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils
- EPA Victoria (2009) Information bulletin acid sulfate soil and rock

- EPA Victoria requirements for management of waste soil, including waste acid sulfate soil where relevant
- Project-specific geotechnical, environmental and excavation management requirements.

Management measures for the wind farm will be based on the following principles:

- Avoiding disturbance of ASS where practicable through design, micro-siting and construction planning.
- Identifying areas of ASS risk before excavation using available mapping, site history, geology and targeted investigation.
- Minimising the volume and duration of ASS exposure during excavation.
- Separating suspected or confirmed ASS material from non-ASS material.
- Managing excavated ASS material to prevent oxidation, acid generation and contaminated runoff.
- Managing water from ASS-affected excavations so acidic or contaminated water is not discharged untreated.
- Treating, reburial, or lawfully disposing of ASS material in accordance with specialist advice and regulatory requirements.

Prior to high-risk excavation, the project will review available ASS information and undertake targeted field verification where required. EPA Victoria guidance recommends using qualified consultants where needed.

Where investigations or field observations indicate potential ASS risk, the following measures will be implemented:

- targeted sampling and laboratory analysis prior to bulk disturbance
- field screening during excavation
- segregation of suspect materials
- preparation of excavation-specific management controls
- contingency arrangements for liming, reburial, encapsulation, water treatment or off-site disposal if required.

These measures are intended to prevent impacts from acidification of soils and waters, avoid harm to sensitive receptors, and ensure excavation activities are managed consistently with Victorian best practice.

Table 2.14 Management criteria for ASS

Item	Description
Risk event and timing	• Excavation for turbine foundations, crane hardstands, access tracks, cable trenches and drainage structures. • Deep disturbance of soil, sediment or weathered rock during construction.

Item	Description	
		• Dewatering or groundwater ingress in excavations that may intersect ASS-affected materials. • Temporary stockpiling, handling, transport or re-use of ASS-affected material. • Rainfall contacting exposed ASS or ASS stockpiles.
Objectives		• Avoid or minimise disturbance of ASS wherever practicable. • Prevent oxidation of ASS and generation of acidic drainage. • Prevent discharge of acidic water or metal-impacted water to the environment. • Ensure excavated ASS material is identified, segregated, handled and managed appropriately. • Protect surface water, groundwater, ecological values and adjacent land uses. • Achieve compliance with Victorian environmental obligations, project approvals and applicable best practice guidance.
Performance criteria		• Areas with potential ASS risk are assessed before high-risk disturbance. • Suspected or confirmed ASS is clearly identified and segregated from clean material. • No unauthorised discharge of acidic water, contaminated water, or untreated water from ASS-affected excavations. • Excavated ASS material is not left exposed longer than necessary. • Treatment, reburial, encapsulation or off-site disposal is undertaken in accordance with specialist advice and regulatory requirements. • Any waste ASS is classified and managed in accordance with EPA Victoria waste-soil requirements where disposal or off-site management is required.
Monitoring	Water quality monitoring	• Undertake water quality monitoring in the Albert River, as outlined in Table 2.10.
	Project proponent	• Commission pre-construction, mid-construction and post-construction water quality monitoring in the Albert River. • Review ASS investigation findings, incident reports and corrective actions provided by the contractor. • Review monthly environmental reporting and specialist advice.

Item	Description	
		• Undertake periodic inspections of representative excavation areas and ASS management locations. • Commission specialist review or audit where required.
	EPC contractor	• Inspect high-risk excavation areas daily during and after disturbance. • Weekly monitor excavation faces, spoil, stockpiles and any collected water for signs of ASS, including staining, odour, unexpected acidity indicators or other field evidence. • Implement field screening and sampling where required. • Weekly inspect containment, covers, liming areas, encapsulation zones and water controls. • Record maintenance, treatment and disposition of ASS material.
Reporting	Project proponent	• Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	• Notify the project proponent of any ASS-related environmental incident within 24 hours. • Maintain registers for ASS identification, treatment, disposal and corrective actions. • Provide monthly reporting that includes: – areas excavated in ASS-risk zones – field screening and laboratory results – volumes of suspected or confirmed ASS material handled – treatment, reburial or disposal actions – water management outcomes – incidents, non-conformances and close-out status.
Contingencies	Project proponent	• Ensure notifiable incidents are reported to regulators (as required).

Item	Description	
(Trigger events may include: • identification of potential ASS or acid sulfate rock during excavation • unexpected acidic water in excavations • prolonged exposure of ASS material • rainfall affecting exposed ASS or stockpiles • failure of containment, segregation or treatment measures • requirement to dispose of ASS material off site.)		• Oversee implementation of corrective actions.
	EPC contractor	• Cease or restrict works in the affected area where safe and practicable. • Isolate and clearly delineate affected material. • Minimise further disturbance and exposure. • Arrange field screening, sampling and specialist review. • Implement temporary containment, covering, liming or reburial measures as directed. • Prevent discharge of untreated or contaminated water. • Update excavation and handling procedures before recommencing works.

Table 2.15 ASS corrective actions (if required)

Trigger	Corrective action
Unexpected identification of potential ASS during excavation.	• Immediately cease works in the affected area where safe to do so. • Isolate the affected material and prevent mixing with clean spoil. • Minimise exposure to air and rainfall. • Undertake field screening and obtain specialist advice. • Revise excavation and material handling controls before recommencing works.
Acidic water identified in excavation	• Stop any discharge from the excavation. • Contain affected water for assessment and treatment. • Assess water quality and determine suitable treatment or disposal requirements. • Prevent release to drains, waterways or surrounding land unless compliant. • Update water management controls and record the incident.
ASS stockpile left exposed or affected by rainfall	• Cover or otherwise protect the stockpile immediately. • Contain runoff and prevent contact with clean water. • Inspect for signs of acid generation.

Trigger	Corrective action
	- Implement treatment, reburial or other specialist-directed controls. - Review stockpile duration and storage arrangements.
Incorrect handling or mixing of ASS with non-ASS material	- Stop handling activities and isolate the mixed material. - Reassess the material classification with specialist input. - Update handling, labelling and segregation procedures. - Retrain relevant personnel. - Record the non-conformance and corrective action.
Off-site disposal of ASS material required	- Classify the material appropriately. - Confirm receiving facility requirements and lawful transport/disposal arrangements. - Track quantities removed and retain disposal records. - Ensure disposal aligns with EPA Victoria waste-soil requirements, which expressly address waste ASS.
Repeated non-conformance with management requirements	- Conduct root cause analysis. - Review construction methodology and sequencing. - Retrain relevant personnel. - Increase supervision and inspection frequency. - Update management procedures. - Escalate to project proponent and consider independent audit.

2.3.9 Hazardous substances

For the purpose of this Plan, the term “hazardous substance” is used to collectively refer to hazardous chemicals, dangerous goods, regulated waste, waste from ablutions, or any other substance introduced by Project construction that may cause harm to MNES.

Table 2.16 Management criteria for hazardous substances

Item	Description
Risk event and timing	All activities from pre-construction through to completion of commissioning.
Objectives	Prevent impacts to MNES resulting from the transport, storage and handling of hazardous substances.
Performance criteria	- The transport, storage and handling of hazardous substances meets: - Australian Code for the Transport of Dangerous Goods by Road & Rail Edition 7.9, 2024 (or its latest version)

Item	Description	
	– Victoria WorkSafe Code of practice for the storage and handling of dangerous goods 2013 (or its latest version) – The Dangerous Goods (Storage and Handling) Regulations 2022 (or its latest version) • The storage and handling of hazardous chemicals and dangerous goods includes effective means of secondary containment to prevent or minimise impacts on the environment from spillage or leaks. • Appropriate contingency measures are in place to avoid or minimise impacts on the environment related to loss of containment of hazardous substances. • Regulated waste is transported in appropriate intervals and by an appropriately licensed contractor.	
Monitoring	Project proponent	• Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. • Review of monthly reports provided by the EPC contractor. • Minimum quarterly site inspections, to assess the implementation and effectiveness of controls intended to contain and prevent the release of hazardous substances. • Annual audits of construction works to assess the implementation and adequacy of controls in place to manage hazardous substances by a suitably experienced, independent auditor.
	EPC contractor	• Weekly inspections of hazardous substance management during routine environmental inspections. • In addition to the above, random monitoring of hazardous substance management measures by the construction Management Team during routine work.
Reporting	Project proponent	• Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	• Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. • Releases of hazardous substances are logged within incident management

Item	Description
	systems and reported to the Project proponent within 24 hours. - Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - List incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence. - Provide progress updates regarding the implementation of corrective actions through to completion.

Table 2.17 Hazardous substances corrective actions (if required)

Trigger	Corrective action
Fuel or chemical release due to leak or spill.	- Immediately implement spill response protocol. - Immediately confirm secondary containment control measures (if applicable). - Contain and dispose of contaminated waste (including impacted soils) via a licensed regulated waste contractor. - Investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.
Failure of sewage systems causing unintended release of sewage waste to the environment.	- Immediately cease use of facilities linked to the failed system. - Immediately confirm contingency measures. - As best as possible, without compromising the safety of personnel, contain the release to the smallest area possible. - Engage a specialist contractor to attend site and remediate impacted area. - Investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.

2.3.10 Pest plants and animals (Biosecurity)

Biosecurity management will be based on the following principles:

- prevent the introduction of pest plants and animals
- minimise spread
- monitor

- respond
- rehabilitate.

Key management measures will include:

- Implement vehicle and equipment hygiene protocols (clean-down prior to site entry and between work areas).
- Restrict vehicle movements to designated access tracks.
- Stabilise disturbed areas progressively to reduce weed establishment potential.
- Manage stockpiles to prevent weed spread.
- Implement pest control measures where required (in consultation with relevant authorities).
- Avoid creation of unnecessary access tracks and rehabilitate temporary access areas promptly.
- Increased inspection and maintenance frequency of controls.

Table 2.18 Management criteria for pest plants and animals

Item	Description
Risk event and timing	• Vehicle and plant movement from pre-construction through to operations. • Earthworks and vegetation disturbance during construction. • Creation of access pathways and disturbed areas facilitating movement of feral animals from early works through to operations.
Objectives	• Prevent impacts to MNES resulting from the introduction and/or spread of pest plants and animals. • Prevent the establishment of new weed species within the project area. • Manage and minimise the spread of existing weed infestations. • Limit the movement and encroachment of feral animals into new areas.
Performance criteria	• No introduction of new declared pest plant or animal species attributable to Project activities. • No significant increase in the extent or density of existing weed infestations within or adjacent to the Project area. • Effective implementation of hygiene and biosecurity controls across all work areas. • Feral animal activity does not increase as a result of Project disturbance or access creation. • All controls are implemented, maintained, and remain effective throughout construction.

Item	Description	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and track implementation of corrective actions. - Review monthly environmental reports. - Undertake a minimum of quarterly site inspections to assess the effectiveness of biosecurity controls. - Undertake annual independent audits of construction activities to assess implementation and adequacy of pest and weed management measures.
	EPC contractor	- Undertake pre-construction baseline assessment of weeds and pest species within the Project footprint. - Implement routine inspections (minimum weekly) for weeds and pest species as part of environmental inspections. - Undertake targeted inspections following disturbance activities or rainfall events. - Record and report: - Any new weed or pest species detected. - Any increase in weed or pest presence beyond baseline conditions. - Undertake opportunistic monitoring by site personnel during routine activities.
Reporting	Project proponent	Undertake regulatory reporting in accordance with legislative requirements and approval conditions.
	EPC contractor	- Undertake regulatory reporting as required and agreed with the project proponent. - Report any biosecurity incidents within 24 hours. - Maintain an incident and corrective action register. - Provide monthly reports to the Project proponent, including:

Item	Description
	- Results of monitoring and inspections - Summary of incidents and non-conformances - Investigation outcomes and corrective actions - Progress on implementation and close-out of corrective actions

Table 2.19 Biosecurity corrective actions (if required)

Trigger	Corrective action
Introduction of new weed species within the Project area	- Immediately isolate the affected area and prevent further spread (e.g. restrict access, install temporary barriers). - Identify species and extent of infestation. - Implement appropriate control measures (e.g. manual removal, herbicide treatment) in accordance with relevant guidelines. - Review and reinforce hygiene protocols (vehicle and equipment clean-down). - Increase monitoring frequency until eradication is confirmed.
Increase in density or spread of existing weed infestations beyond baseline levels	- Investigate cause (e.g. vehicle movement, soil disturbance, stockpiles). - Implement targeted weed control measures. - Stabilise disturbed areas (e.g. mulching, seeding) to reduce further establishment. - Review and update biosecurity measures if required. - Increase inspection and maintenance frequency.
Detection of pest plant species in previously unaffected areas	- Cease works in the immediate area if necessary. - Contain and map extent of infestation. - Remove or treat affected vegetation. - Review access controls and hygiene procedures. - Provide toolbox talk to site personnel on weed identification and prevention.
Evidence of increased feral animal activity (e.g. tracks, burrows, sightings)	- Investigate potential causes (e.g. access tracks, waste management, water sources). - Implement control measures (e.g. fencing, trapping, deterrents) in consultation with relevant authorities. - Remove attractants (e.g. waste, standing water). - Restrict access to sensitive areas where required. - Increase monitoring in affected areas.

Trigger	Corrective action
Creation of unintended access pathways facilitating feral animal movement	• Close and rehabilitate unnecessary access tracks. • Install barriers or fencing where required. • Reinstate vegetation cover where practicable. • Review construction access planning and update controls.
Failure to implement or maintain hygiene controls (e.g. dirty vehicles entering site)	• Stop non-compliant vehicles or equipment from entering or moving within site. • Undertake immediate clean-down. • Reinforce hygiene procedures with personnel and contractors. • Increase supervision and compliance checks. • Update procedures if systemic issues are identified.
Biosecurity incident (e.g. uncontrolled spread, significant infestation)	• Notify Project proponent within 24 hours. • Contain and isolate affected area. • Engage specialist advice if required. • Implement eradication or control program. • Record incident and corrective actions. • Review and update management measures.
Repeated non-conformance with pest and weed management requirements	• Conduct root cause analysis. • Review and update biosecurity management procedures. • Retrain personnel and contractors. • Increase inspection and reporting frequency. • Escalate to Project proponent and consider independent audit.
Disturbance areas not stabilised leading to weed establishment	• Stabilise exposed soils (e.g. mulching, seeding, erosion control measures). • Implement weed control in affected areas. • Review timing and sequencing of rehabilitation works. • Increase monitoring until stabilisation is effective.

2.3.11 Bushfire

Table 2.20 Management criteria for bushfire

Item	Description
Risk event and timing	• Operation of vehicles, machinery and other equipment from pre-construction through to operations. • Storage and handling of flammable materials from pre-construction through to operations. • 'Hot works' from pre-construction through to operations.

Item	Description	
Objectives	Prevent bushfire resulting from construction works.	
Performance criteria	- Zero incidences of bushfire resulting from construction works. - Construction works are undertaken in accordance with Country Fire Authority (CFA) Design Guidelines and Model Requirements for Renewable Energy Facilities, January 2025 (or its latest version).	
Monitoring	Project proponent	- Review incident reports provided by the EPC contractor and remain abreast of corrective action implementation. - Review of monthly reports provided by the EPC contractor. - Minimum quarterly site inspections, to assesses the implementation and effectiveness of controls implemented to prevent bushfire. - Annual audits of construction works to assess the implementation and adequacy of controls in place to prevent bushfire by a suitably experienced, independent auditor.
	EPC contractor	- Weekly monitoring for weeds, other vegetation and other bushfire hazards within the Project Area during routine environmental inspections. - In addition to the above, random monitoring of bushfire hazards by the construction Management Team during routine work.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	EPC contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - All bushfire occurrences resulting from Project activities are logged within incident management systems and reported to the Project proponent as soon as possible, and no later than 6 hours from identification. - All bushfire hazards, that have not previously been addressed, are logged according to the hazard identification process in place.

Item	Description
	- Monthly reports are submitted to the Project proponent which: - Communicate the findings of weekly monitoring undertaken. - List all bushfire related hazards identified during the reporting period. - List all incidents that have occurred during the period. - Provide details of incident investigation findings and corrective actions identified to prevent recurrence. - Provide progress updates regarding the implementation of corrective actions through to completion.

Table 2.21 Bushfire corrective actions (if required)

Trigger	Corrective action
Fire within the Project Area caused by construction activities.	- Small fires – extinguish using onsite firefighting equipment in accordance with safety procedures. - Larger fires – initiate emergency response procedures and engage external emergency services.
Fire within the Project Area not caused by construction activities.	- Initiate emergency response procedures and engage external emergency services. - Cooperate with external emergency service providers for fire response and follow all directions given.

2.4 High-level estimation of costs of mitigation measures for the construction phase

A CEMP and relevant sub-plans, procedures and protocols will be developed based on competitive market rates at the time of preparation.

The relevant design and construction costs of mitigation measures, e.g., including the operation and maintenance of necessary plant and/or equipment, the design and construction of stormwater drainage systems, the implementation of silt fences or rock dams, water pumps for excavation works, will be considered in the Project's overall development and construction costs.

The Project’s construction phase has potentially higher risks of environmental impacts. Therefore, an OHSE specialist would be typically available onsite, at least during peak construction, somewhere in the range of 0.25 to 1 full time equivalent (FTE) depending on project complexity.

The monitoring and reporting of compliance against environmental management requirements would be among the key responsibilities to be undertaken by the OHSE specialist, including:

- Opportunistic observations of the construction activities
- Regular (daily/weekly/monthly) and event based (incidents/non-conformance) monitoring and inspections of the construction activities
- Reporting (event based/weekly/monthly/annual) of the construction activities conformance with the CEMP.

The related costs for monitoring and reporting would be considered based on material costs and time allocation against monthly/annual salary.

Any specialist work including pre-clearance ecological surveys will likely be carried out by external consultants. Independent environmental audits will be carried out by third-party auditors.

The costs of monitoring and auditing the CEMP during the construction phase might include:

- | | |
|---|---------------|
| • Ecological clearance/no go flagging | \$10-15k/each |
| • Initial independent audit | \$15-20k |
| • Annual audits | \$10-15k/each |
| • OHSE personnel (0.5 FTE * 120k potential annual salary) | \$60k/each |

3 Operations EMP outline

This section outlines the environmental management framework that will underpin the mitigation and management of potential impacts on MNES identified for the Project operation phase. This framework will inform the development and implementation of an OEMP and relevant sub-plans.

The OEMP defines the environmental management systems and provides a management framework for effective application of the relevant sub-plans, which will be required to adopt all specific measures identified within section 9 (a) i – v of the PER to avoid, mitigate and manage potential impacts to MNES relevant to operations works.

3.1 Environmental management systems

Project operation works will be undertaken under the Operational and Maintenance (O&M) contractor's management systems which, as a minimum, will comprise:

- A corporate policy which demonstrates a commitment to responsible environmental management.
- A corporate environmental management system currently certified to, or able to be certified to, AS14001:2015 (or later).
- Clearly defined roles and responsibilities for personnel regarding environmental management.
- Provision for the appropriate induction and training of personnel.
- Identification, allocation and maintenance of appropriate resourcing, being sufficient and suitably qualified environmental management personnel, to manage construction, operational and environmental risk in accordance with Approvals and Regulatory Requirements.
- Monitoring and auditing programs to assess compliance with procedures and the achievement of objectives.
- Provisions for continual review and improvement of environmental performance.
- A system of reporting for recording data and notification of relevant personnel.
- Processes for document and records management.

The Project proponent will ensure that the successful O&M contractor has robust systems in place for environmental management as part of the contractor selection process.

3.2 Roles and responsibilities

General roles and responsibilities relating to operations environmental management are described in Table 2.1. Responsibilities for monitoring, reporting and the implementation of corrective actions (if required) are identified within the management criteria and corrective action tables provided in Section 0.

Table 3.1 Project operations environmental responsibilities

Role	Responsibilities
Project proponent	• Ensure that all relevant approvals requirements: – Are communicated to O&M contractor; – Are sufficiently addressed by operations tenders / bids; procurement documents and – Are contractually binding. • Approve O&M contractor management plans prior to commencement of works to ensure that they achieve or exceed Project environmental objectives and Approval and Regulatory Requirements. • Undertake regular assurance activities, including auditing, to ensure that operations environmental management is undertaken by the O&M contractor in line with Project standards.
O&M contractor	• Ensure that adequate processes, plans and procedures are in place to manage potential environmental impacts in line with Project standards. • Develop and maintain OEMP, relevant sub-plans and all other plans as required to achieve Project operations environmental management requirements. • Develop and implement an environmental assurance program, maintain associated records, and initiate improvement actions as required. • Establish, monitor, maintain and audit effective environmental controls onsite. • Allocate sufficient resources for environmental management. • Respond to, report and investigate environmental incidents as appropriate and identify corrective actions to prevent recurrence. • Ensure that reportable environmental incidents are communicated to the Project proponent and the relevant regulatory authority. • Ensure that sufficient training is provided to operations personnel to achieve awareness of environmental management requirements. • Develop and implement site rehabilitation plans (as required).

3.3 Impact management criteria

The following Sections 3.3.1 – 3.3.7 outline management criteria and monitoring measures, performance criteria and specific responsibilities to be adopted by the OEMP and relevant sub-plans for each of the potential impacts of the action during the Project operations phase.

3.3.1 Barotrauma and collision risk

Barotrauma and collision with wind farm infrastructure such as turbine blades and electricity transmission lines are known risks to birds and bats. These risks are associated with the operation of wind farms and consequently also with this Project.

Management criteria and corrective actions relating to bird and bat impacts are detailed at length within the Project Bird and Bat Management Plan (BBMP) provided as an attachment to the PER. Management requirements identified by the BBMP will be implemented via the OEMP and relevant sub-plans.

3.3.2 Vehicle strike

Table 3.2 Management criteria for MNES fauna strike by operational vehicles

Item	Description	
Risk event and timing	Operational vehicle impact throughout operations.	
Objectives	- Harm to MNES fauna is prevented. - In the event of impact, harm is managed and minimised through effective response.	
Performance criteria	- Operational vehicles always adhere to prescribed speed limits. - All vehicle collisions with MNES fauna are reported, investigated and measures adopted to prevent recurrence. - All injured fauna are transported to a local vet or wildlife carer for treatment.	
Monitoring	Project proponent	- Review incident reports provided by the O&M contractor and remain abreast of corrective action implementation. - Review of annual operational updates provided by the O&M contractor. - Review O&M contractor compliance with OEMP on an annual basis. - Initiate a full audit of O&M contractor environmental management systems and OEMP implementation, by a suitably experienced and independent auditor, at least once within the first two years of contract award (post commissioning) and at least 5-yearly thereafter.
	O&M contractor	Always monitor operational vehicle speeds in line with safety protocols.
Reporting	Project proponent	Report operational impacts to MNES fauna as per legislative requirements and license conditions.

Item	Description	
	O&M contractor	- Regulatory reporting as per legislative requirements and license conditions as agreed with the Project proponent. - Events involving physical harm to fauna are logged within incident management systems and reported to the Project proponent within 24 hours. - Include a summary of all vehicle collisions with fauna that occurred during the reporting period within annual operations reports (if any).

Table 3.3 Vehicle strike corrective actions (if required)

Trigger	Corrective action
Vehicle collision with native fauna.	Report and investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.

3.3.3 Light, noise and vibrations

Table 3.4 Management criteria for operational light, noise and vibrations

Item	Description	
Risk event and timing	Light and noise throughout Project operations.	
Objectives	Avoid or minimise disturbance to MNES fauna caused by lighting and noise generated by Project operations.	
Performance criteria	- All operational activities are in line with relevant EPA Victoria regulations and guidelines. - All infrastructure design specifications adopted to avoid or minimise noise and light impacts are maintained. - Night lighting is limited to the minimum required for safety and security. - All lighting is directed at required areas only and light spill beyond these areas is prevented.	
Monitoring	Project proponent	- Initiate and oversee the bird and bat monitoring program specified within the Project BBMP. - Review of bird and bat monitoring outcomes.

Item	Description	
		- Review information provided by the O&M contractor pertaining to fauna sightings. - Review incident reports provided by the O&M contractor and remain abreast of corrective action implementation.
	O&M contractor	Opportunistic monitoring of native fauna activity during routine operational activities.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	O&M contractor	- Report observations of fauna attraction by site lighting to Project proponent. - Events involving the disturbance of fauna caused by Project lighting and / or noise are logged within incident management systems and reported to the Project proponent within 24 hours. - Include a summary of fauna impacts due to noise and lighting that occurred during the reporting period within annual operations reports.

Table 3.5 Noise and light corrective actions (if required)

Trigger	Corrective action
Operational noise generated by the facility exceeds EPA Victoria regulations and guidelines.	- Identify the source and cause of noise exceedance and undertake maintenance on equipment to reduce noise emissions. - Investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.
Nocturnal MNES fauna are observed congregating at lit Project facilities.	- Review lighting requirements at that location and: - Consider alternative safety and security measures that would allow the removal of lighting. - Consider reducing the intensity and coverage of lighting present. - Seek advice from a fauna specialist if the potential for harm is identified.

3.3.4 Hazardous substances

The use of hazardous substances for windfarm operations has been identified as a potential threat to MNES values. For the purposes of this Plan, the term “hazardous substance” collectively refers to hazardous chemicals, dangerous goods, regulated waste, waste from ablutions, or any other substance introduced by Project operations that may cause harm to MNES.

Table 3.6 Management criteria for operational uses of hazardous substances

Item	Description	
Risk event and timing	All activities throughout Project operations.	
Objectives	Prevent impacts to MNES values resulting from the transport, storage and handling of hazardous substances.	
Performance criteria	- The transport, storage and handling of hazardous substances meets: - Australian Code for the Transport of Dangerous Goods by Road & Rail Edition 7.9, 2024 (or its latest version) - Victoria WorkSafe Code of practice for the storage and handling of dangerous goods 2013 (or its latest version) - The Dangerous Goods (Storage and Handling) Regulations 2022 (or its latest version) - The storage and handling of hazardous chemicals and dangerous goods includes effective means of secondary containment to prevent or minimise impacts on the environment from spillage or leaks. - Appropriate contingency measures are in place to avoid or minimise impacts on the environment related to loss of containment of hazardous substances. - Regulated waste is transported in appropriate intervals and by an appropriately licensed contractor.	
Monitoring	Project proponent	- Review incident reports provided by the O&M contractor and remain abreast of corrective action implementation. - Review of annual operational updates provided by the O&M contractor. - Review O&M contractor compliance with OEMP on an annual basis. - Initiate a full audit of O&M contractor environmental management systems and OEMP implementation, by a suitably experienced auditor, at least once within the first two years of contract award (post commissioning) and at least 5 yearly thereafter.

Item	Description	
	O&M contractor	Regularly monitor the implementation of hazardous substance controls at appropriate intervals nominated within the OEMP.
Reporting	Project proponent	Project level regulatory reporting as per legislative requirements and permit conditions.
	O&M contractor	- Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project proponent. - Releases of hazardous substances are logged within incident management systems and reported to the Project proponent within 24 hours. - Provide a summary of all environmental incidents, including fuel and/or chemical spills, that occurred during the reporting period within annual operations reports.

Table 3.7 Operational use of hazardous substances corrective actions (if required)

Trigger	Corrective action
Fuel or chemical release due to a leak or spill.	- Immediately implement spill response protocol. - Immediately confirm secondary containment control measures (if applicable). - Contain and dispose of contaminated waste (including impacted soils) via a licensed regulated waste contractor. - Investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.
Failure of sewage systems causing unintended release of sewage waste to the environment.	- Immediately cease use of facilities linked to the failed system. - Immediately confirm contingency measures. - As best as possible, without compromising the safety of personnel, contain the release to the smallest area possible. - Engage a specialist contractor to attend site and remediate impacted area. - Investigate the incident, identify root cause and contributing factors and take action to prevent recurrence.

3.3.5 Bushfire

Table 3.8 Management criteria for operational bushfire hazards

Item	Description	
Risk event and timing	• Operation of vehicles, machinery and other equipment throughout operations. • Storage and handling of flammable materials throughout operations. • 'Hot works' throughout operations.	
Objectives	• Prevent bushfire resulting from Project operations.	
Performance criteria	• Zero incidences of bushfire resulting from Project operations. • Project operations are undertaken in accordance with CFA Design Guidelines and Model Requirements for Renewable Energy Facilities, January 2025 (or its latest version). • Project infrastructure is maintained in line with relevant safety standards.	
Monitoring	Project proponent	• Review incident reports provided by the O&M contractor and remain abreast of corrective action implementation. • Review of annual operational updates provided by the O&M contractor. • Review O&M contractor compliance with OEMP on an annual basis. • Initiate a full audit of O&M contractor environmental management systems and OEMP implementation, by a suitably experienced auditor, at least once within the first two years of contract award (post commissioning) and at least 5 yearly thereafter.
	O&M contractor	• Regularly monitor the implementation of controls identified to mitigate bushfire risk at appropriate intervals nominated within the OEMP.
Reporting	Project proponent	• Project level regulatory reporting as per legislative requirements and license conditions.
	O&M contractor	• Regulatory reporting as per legislative requirements and permit conditions as agreed with the Project Owner. • All occurrences of fire attributable to facility operations are logged within incident management systems and

Item	Description
	reported to the Project proponent as soon as possible. • All bushfire hazards, that have not previously been addressed, are logged according to the hazard identification process in place. • Provide a summary of all incidences of fire, that occurred during the reporting period within annual operations reports.

Table 3.9 Bushfire hazards during operations corrective actions (if required)

Trigger	Corrective action
Fire within the Project Area caused by operations and / or maintenance activities.	• Small fires – extinguish using onsite firefighting equipment in accordance with safety procedures. • Larger fires – initiate emergency response procedures and engage external emergency services.
Fire within the Project Area not caused by operations and / or maintenance activities.	• Initiate emergency response procedures and engage external emergency services. • Cooperate with external emergency service providers for fire response and follow all directions given.

3.3.6 Soil and water management

Soil and water management measures will be implemented during the operational phase to avoid or minimise impacts to surrounding land, waterways, wetlands, drainage lines, and associated environmental values.

Measures will address ongoing risks associated with:

- access track use and maintenance
- turbine hardstand areas
- drainage infrastructure
- minor ground disturbance during maintenance works
- extreme weather events.

All measures will be implemented in accordance with relevant Victorian legislation, EPA guidance (including General Environmental Duty), and best practice guidelines.

Operational soil and water management will be based on the following principles:

- Maintaining stability of all disturbed areas (e.g. access tracks, batters, hardstands).

- Preventing erosion from operational infrastructure through routine inspection and maintenance.
- Maintaining effective drainage to avoid concentration of flows and scouring.
- Minimising disturbance during maintenance activities.
- Managing runoff to prevent sediment or contaminants entering waterways.
- Prompt rehabilitation of any newly disturbed areas.
- Implementing a risk-based approach to inspection and maintenance.

Weather conditions will be monitored to inform operational maintenance and risk management. This will include:

- Monitoring BoM forecasts for heavy rainfall, storms or prolonged wet conditions.
- Identifying periods where access tracks or drainage systems may be vulnerable.

Where increased risk is identified, the following measures will be implemented:

- Restricting access to vulnerable tracks or areas.
- Inspecting and maintaining drainage systems prior to forecast rainfall.
- Stabilising exposed areas or erosion-prone sections.
- Increasing inspection frequency following rainfall events.

These measures ensure that operational activities do not result in erosion, sediment transport or off-site impacts.

Table 3.10 Management criteria for soil and water management during operations

Item	Description
Risk event and timing	• Routine vehicle movements on access tracks and around turbine hardstands. • Maintenance works involving minor excavation, grading or vegetation disturbance. • Degradation of drainage systems (e.g. table drains, culverts, cross-drains). • Erosion of batters, track surfaces and disturbed areas over time. • Extreme weather events (e.g. heavy rainfall, flooding, drought conditions). • Occasional upgrades or replacement works for infrastructure.
Objectives	• Maintain stability of operational infrastructure and disturbed areas. • Prevent erosion and sediment transport from site infrastructure. • Protect surface water and groundwater quality. • Maintain effective site drainage and hydrological function. • Ensure compliance with Victorian environmental legislation and approvals.

Item	Description	
Performance criteria	• No visible off-site sediment discharge or erosion impacts. • Access tracks, batters and hardstands remain stable and well-maintained. • Drainage infrastructure is functional and free of blockages. • Any erosion issues are identified early and rectified promptly. • Disturbed areas from maintenance works are rehabilitated as soon as practicable. • No uncontrolled discharge of sediment-laden or contaminated water.	
Monitoring	Project proponent	• Review environmental performance reports and incident records. • Undertake periodic inspections (e.g. quarterly or biannually). • Commission audits where required by approvals.
	O&M contractor	• Routine inspection of: – access tracks – drainage systems (culverts, table drains, cross-drains) – batters and disturbed areas. • Inspections following significant rainfall events. • Identification of erosion, sediment build-up, or drainage failures. • Maintenance and repair of infrastructure as required. • Recording of inspection outcomes and maintenance actions.
Reporting	Project proponent	• Project level regulatory reporting as per legislative requirements and license conditions.
	O&M contractor	• Report environmental incidents within 24 hours. • Maintain records of: – inspections • maintenance activities • incidents and corrective actions • Provide periodic (e.g. quarterly or annual) environmental reports.

Table 3.11 Soil and water corrective actions during operations (if required)

Trigger	Corrective action
Localised erosion identified on access tracks or batters	• Regrade and stabilise affected area. • Install additional drainage or erosion protection measures. • Improve surface treatment (e.g. gravel, vegetation). • Increase inspection frequency until stable.
Repeated erosion or drainage failure	• Conduct root cause analysis. • Review drainage design and flow paths. • Upgrade infrastructure (e.g. additional culverts, cross-drains). • Modify maintenance practices. • Engage specialist advice if required.
Sediment discharge observed off-site	• Identify and isolate source. • Install or upgrade controls to prevent further discharge. • Repair affected areas. • Record and report incident.
Damage following extreme rainfall event	• Inspect all infrastructure across the site. • Prioritise repair of critical erosion and drainage issues. • Stabilise vulnerable areas. • Update risk assessments and maintenance schedules.
Disturbance from maintenance works not stabilised	• Stabilise disturbed area immediately. • Reinstatement vegetation or surface cover. • Review work practices to prevent recurrence.

3.3.7 Pest plants and animals (Biosecurity)

Pest plant and animal management measures will be implemented during the construction and operational phases of the wind farm to avoid or minimise the introduction, spread, and establishment of invasive species within the site and surrounding land.

Measures will address risks associated with:

- vehicle and machinery movement
- soil disturbance and stockpiling
- imported materials (e.g. gravel)
- ongoing maintenance activities
- interaction with surrounding agricultural land.

Pest plant and animal management will be based on the following principles:

- Preventing introduction and spread of declared noxious weeds and pest animals
- Minimising disturbance that may facilitate weed establishment
- Implementing hygiene and biosecurity controls for vehicles, plant and materials
- Early detection and rapid response to new infestations
- Coordinating management with adjacent landholders and authorities where required
- Using appropriate control methods (mechanical, chemical, biological) in accordance with best practice and legislation.

Management will consider seasonal and operational factors that influence pest species:

- Monitoring seasonal weed germination and growth periods
- Identifying high-risk periods for pest animal activity (e.g. breeding seasons)
- Considering rainfall patterns that may promote weed establishment.

Where increased risk is identified, the following measures will be implemented:

- Targeted weed control prior to seeding or flowering
- Increased inspections during high-risk seasons
- Restricting movement through infested areas where practicable
- Implementing additional hygiene controls for vehicles and equipment.

Table 3.12 Management criteria for pest plants and animals

Item	Description
Risk event and timing	• Clearing and disturbance during construction creating conditions for weed establishment. • Movement of vehicles, machinery and personnel between sites. • Importation of materials (e.g. gravel, fill) containing weed propagules. • Stockpiling and redistribution of topsoil. • Ongoing maintenance activities (e.g. track grading, vegetation management). • Presence and movement of pest animals across the site.
Objectives	• Prevent introduction and spread of pest plant species. • Prevent increase in abundance or distribution of pest animals.

Item	Description	
	- Protect native vegetation and ecological values. - Minimise impacts to surrounding agricultural land. - Achieve compliance with Victorian legislation and landholder obligations.	
Performance criteria	- No new priority weed species introduced as a result of project activities. - Existing weed infestations are not exacerbated by project activities. - Hygiene controls are implemented for vehicles, plant and materials. - Pest animal activity is monitored and managed where it poses environmental or land-use risks. - Weed infestations are controlled prior to seeding/spread where practicable. - Disturbed areas are rehabilitated to reduce weed colonization.	
Monitoring	Project proponent	- Review environmental performance reports and incident records. - Undertake periodic inspections (e.g. seasonal or annual). - Liaise with landholders and relevant authorities where required.
	O&M contractor	- Monthly inspection of: - disturbed areas - access tracks and turbine surrounds - stockpile areas - drainage lines and revegetation areas. - Identification of weed species and pest animal activity. - Monitoring effectiveness of control measures. - Recording inspection outcomes and actions taken.
Reporting	Project proponent	Undertake regulatory reporting in accordance with legislative requirements and approval conditions
	O&M contractor	- Report biosecurity incidents (e.g. new weed outbreaks) within 24 hours where significant. - Maintain records of: - inspections

Item	Description	
		– weed and pest observations – control activities undertaken. • Provide periodic (e.g. annual or seasonal) reporting.

Table 3.13 Biosecurity corrective actions during operations (if required)

Trigger	Corrective action
New weed species detected	• Identify and map infestation. • Implement immediate control measures. • Prevent spread via access restrictions or hygiene controls. • Monitor effectiveness and follow up treatment.
Expansion of existing weed infestations	• Increase control effort (e.g. additional treatment cycles). • Review disturbance and rehabilitation practices. • Improve stabilisation and revegetation.
Weed introduction via vehicles or materials	• Review and enforce hygiene protocols. • Clean down vehicles and equipment. • Verify material sources and quality. • Update procedures and retrain personnel.
Pest animal impacts identified	• Assess extent and significance of impact. • Implement appropriate control measures (e.g. trapping, exclusion, coordination with landholders). • Monitor outcomes and adapt management approach.
Repeated non-compliance with management requirements	• Conduct root cause analysis. • Retrain personnel and improve supervision. • Update management procedures. • Increase monitoring and reporting frequency.

3.4 High-level estimation of costs of mitigation measures for the operational phase

An Operations Environmental Management Plan (OEMP) and relevant sub-plans, procedures and protocols will be developed based on competitive market rates at the time of preparation.

During the operational phase, generally the activities undertaken at the Project would be of lower environmental risk and involve a reduced level of monitoring and maintenance.

Therefore, an OHSE specialist would typically not be available onsite, but would monitor the Project remotely and/or onsite in regular intervals and as needed. Given the relatively low complexity of the Project, this might be in the range of 0.05 to 0.25 FTE.

The monitoring and reporting of compliance against environmental management requirements would be among the key responsibilities to be undertaken by the OHSE specialist, including:

- Opportunistic observations of the operation activities
- Regular (monthly/quarterly/annual) and event based (incidents/non-conformance) monitoring and inspections of the operation activities
- Reporting (monthly/quarterly/annual) of the operation activities conformance with the OEMP.

The related costs for monitoring and reporting would be considered based on material costs, travel costs and time allocation against monthly/annual salary.

Any specialist work including ecological surveys will likely be carried out by external consultants. Independent environmental audits will be carried out by third-party auditors.

The costs of monitoring the OEMP during the operational phase of the wind farm include:

Ecological surveys	\$100k-250k/each
Monitoring and reporting	\$5-10k/each
Annual audits	\$10-15k/each.

4 Decommissioning

The operational life of the Project is expected to be 35 years. Infrastructure may be repowered with new equipment for a further project life cycle. Upon decommissioning, the wind farm site will be rehabilitated to facilitate continuation of the current land use at that time. All above-ground infrastructure will be removed, and the land will be rehabilitated in line with planning permit conditions and specific landowner agreements.

Some infrastructure (such as hardstand areas and access tracks) may remain in-situ depending on landowner preferences. Decommissioning activities will be undertaken in accordance with the relevant legislation and planning requirements.

5 References

This EMP Outline has been developed with reference to the following:

- IECA (2008) *Best Practice Erosion and Sediment Control*, International Erosion Control Association (Australasia), Picton, NSW.
- DCCEEW (2024). Environmental Management Plan Guidelines. Department of Climate Change, Energy, the Environment and Water, Canberra, Commonwealth of Australia March 2024
- DSE (2010). Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils. Department of Sustainability and Environment, October 2010
- EPA (2009) Information bulletin acid sulfate soil and rock. Environment Protection Authority. Publication 655.1. July 2009.
- EPA (2020) Working within or adjacent to waterways. Environment Protection Authority. Publication 1896. 30 September 2020.
- EPA (2025) Implementing the general environmental duty for licence holders. Environment Protection Authority. 2 May 2025.
- Environmental Reference Standard under the EP Act 2017
- IECA (2008). Australasia Best Practice Erosion and Sediment Control Manual 2008 (IECA 2008 BPESC Standard). International Erosion and Sediment Control Association.
- Australian Code for the Transport of Dangerous Goods by Road & Rail Edition 7.9, 2024
- Victoria WorkSafe Code of practice for the storage and handling of dangerous goods 2013
- The Dangerous Goods (Storage and Handling) Regulations 2022