Blue MACKEREL

Metocean and Geotechnical Investigations Management Plan Summary

We acknowledge the Gunaikurnai people, the Traditional Owners of the land and sea country where the proposed Blue Mackerel offshore wind project will be located. We pay our respects to their Elders past, present and emerging.

We aspire to a genuine partnership with the Gunaikurnai people that delivers mutual benefit and enhanced stewardship of the environment for the benefit of present and future generations.

We acknowledge the rights and responsibilities of all First Nations peoples for their lands and sea country where we operate.

Document control

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Acronyms

Acronym	Definition
APA	Australian Pipelines Association
BIA	Biologically Important Area
CHARM	Chemical Hazard and Risk Management
CPT	Cone Penetrometer Tests
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEECA	Department of Environment, Energy and Climate Action
DP	Dynamic Positioning
DWR	Directional Wave Rider
EPA	Environment Protection Authority
EPBC	Environment Protection and Biodiversity Conservation
ERP	Emergency Response Plan
FLA	Feasibility Licence Area
FLS	Floating LiDAR System
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
GPS	Global Positioning System
GW	Giga Watt/s
HAZID	Hazard identification
HQ	Hazard Quotient
HSSE	Health, Safety, Security and Environment
IMS	Invasive marine species
LEFCOL	Lakes Entrance Fishermen's Cooperative
MFO/MMO	Marine Fauna Observer/ Marine Mammal Observer
MoC	Management of Change
MP	Management Plan
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
NOPTA	National Offshore Petroleum Tiles Administrator
OCNS	Offshore Chemical Notification Scheme
OEI	Offshore Electricity Infrastructure
OIR	Offshore Infrastructure Regulator
OWEV	Offshore Wind Energy Victoria
OWF	Offshore Wind Farm
PEP	Project Execution Plan
PM	Project Manager
RADAR	Radio Detection and Ranging

RLRAG	Rock Lobster Resource Advisory Group
SBM	Synthetic Based Muds
SBP	Sub-bottom profiler
SLSC	Surf and Life Saving Club
SONAR	Sound Navigation and Ranging
SRW	Southern right whale
SSTK	Simply Stakeholders
UXO	Unexploded Ordinance
WLR	Water Level Recorder

1 Introduction

Blue Mackerel North Pty Ltd (Blue Mackerel) is an offshore wind company, which is owned by JERA Nex and its own subsidiary, Parkwind. The experience JERA Nex and Parkwind shares with Blue Mackerel is shown by its investment, ownership and operations of global offshore wind, onshore wind, solar and batter storage projects totalling 3.4GW. Blue Mackerel plans to deliver 1GW of renewable energy by 2032 to Victorian homes and industries.

The Offshore Infrastructure Regulator (OIR) granted the first feasibility licenses to 12 licence holders on the 1st of May 2024, which included Blue Mackerel. The success of Blue Mackerel's application was assessed against technical and financial capability, likely project viability, applicant suitability, and national interest. The feasibility licence was awarded to Blue Mackerel with the area located in Brataualung and Tatungalung Country, which is 10km from Seaspray off the Gippsland coast.

The feasibility licence allows Blue Mackerel to explore the feasibility licence area (FLA) for the development of the Blue Mackerel Offshore Wind Project (the Project), specifically for positioning wind turbine generators for optimal production of energy. This includes geophysical, geotechnical and metocean investigations. The results from these investigations will provide support to the design and development of the offshore wind project.

This management plan (MP) summary is prepared in accordance with the requirements of Regulation 77(1) of the Offshore Electricity Infrastructure Amendment Regulations 2024 (OEI Regulations). Table 1.1 outlines where the requirements of the regulation are met in this document.

Table 1.1. *Addressing this MP summary against the OEI Regulations*

Regulation 77(a) requirement	Location in the MP summary
Description of activities and operations	Section 1.1 Section 1.2 Section 1.3 Section 1.4 Section 1.5
Consultation	Chapter 2
Stakeholder engagement	
Management system	Chapter 6
Conditions of licence	Section 3.1
Obligations under the *Environment Protection and Biodiversity Conservation Act 1999*	Section 3.2
Maintenance of relevant structure, equipment and property	Section 5.1& 5.2
Decommissioning of licence infrastructure	Section 5.3 & 5.3.2
Removal of relevant structure, equipment and property, and remediation	Section 5.3 & 5.3.1
Emergency management	Chapter 7
Work, health and safety	Chapter 4

1.1 Nature and Context

In accordance with the OEI Regulations 77(1)(a), this section summarises the purpose of the licence and the status of activities undertaken within the licence.

The FLA is 162.68km^2 in area, and the coordinates are provided in Table 1.2. The FLA is located within the Gippsland Declared Area OEI-01-2022 (Part 1), as shown in Figure 1.1.

The first licence activities are proposed to be a range of marine surveys including, geophysical and geotechnical and metocean investigations. The geophysical survey is not an activity regulated under the *Offshore Electricity Infrastructure Act 2021* (OEI Act) or OEI Regulations therefore, not addressed in this MP summary. The licence activities described in this summary MP are the proposed metocean and geotechnical investigations, which are described in Sections 1.3 and 1.4.

Table 1.2 *Blue Mackerel FLA Boundary Coordinates*

Point	Latitude	Longitude
P1	38° 34' 51.25" S	147° 05' 58.89" E
P2	38° 28' 24.87" S	147° 13' 53.15" E
P3	38° 31' 09.79" S	147° 17' 1.64" E
P4	38° 28' 56.37" S	147° 14' 53.85" E

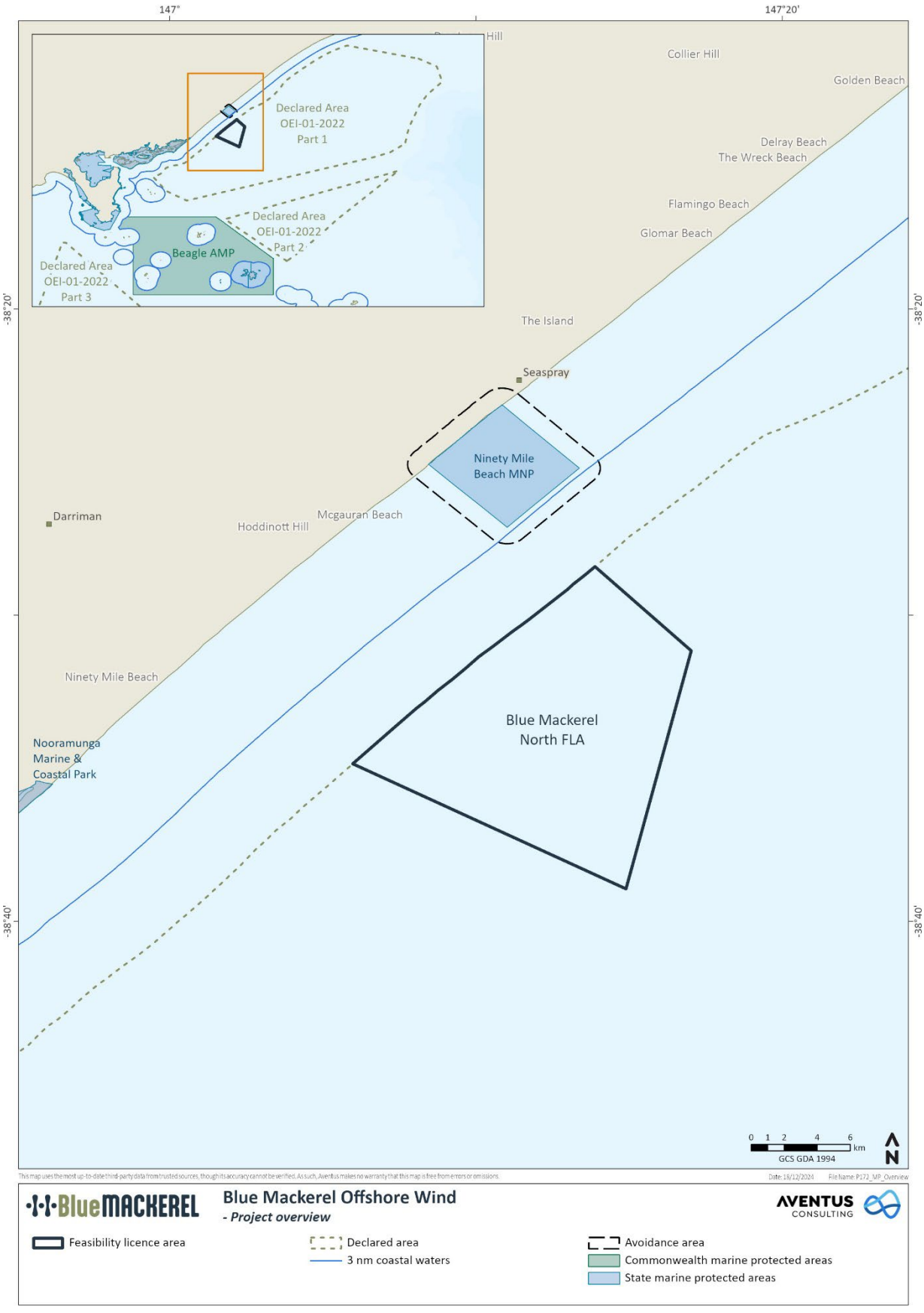

Figure 1.1 *Blue Mackerel FLA*

1.2 Description of Licence Activities

The 'licence activity' defined in this MP summary is:

> *The metocean and geotechnical investigations that will be conducted within the feasibility licence area awarded to Blue Mackerel.*

The licence activity will be further described in Section 1.3 for metocean investigations and Section 1.4 for geotechnical investigations. This includes the location, timing and equipment for the proposed licence activity.

1.3 Metocean Investigations

In accordance with OEI Regulation 77(1)(a), this section summarises the locations, layout and operational details of the proposed metocean investigations and equipment.

Metocean investigations are proposed to take place within the FLA only. The term 'metocean' is a combination of the words meteorological and oceanographic. Metocean surveys obtain wind, wave, current and other atmospheric and oceanographic data. The data acquired will be used to support the planning and design of the proposed offshore wind farm (OWF) infrastructure.

RPS has been contracted to supply and install the metocean equipment and gather and process the collected data. Information derived from the RPS Project Execution Plan (PEP) (RPS, 2024) has been used to inform this chapter.

1.3.1 Description of Equipment

In accordance with Regulation 77(1)(a) of the OEI Regulations, this section is a summary outlining the equipment proposed to be used for the metocean investigations.

The metocean investigation comprises a floating LiDAR system (FLS) and wave buoy. As the contract for metocean equipment supply, installation and data collection has already been awarded, Blue Mackerel has a high degree of confidence in specifying the equipment to be deployed.

1.3.1.1 Floating LiDAR System

LiDAR stands for 'Light Detection and Ranging' and is very similar to Radio Detection and Ranging (RADAR) and Sound Navigation and Ranging (SONAR). Wind is measurable because the particles in the air (such as dust, pollen, etc) are detected by the laser beam.

The equipment contained within the FLS include:

- LiDAR - The LiDAR measures wind profile, turbulence intensity and direction. This includes surface winds, barometric pressure and air temperature approximately 13 m – 300 m above sea level.
- Wave Sensor - These highly accurate inertial sensors will monitor the buoys heave, pitch and roll at 2Hz to allow spectral analysis onboard or in post processing to provide a directional wave spectrum to be produced every 30 minutes for determining wave parameters.
- Anemometer - An anemometer counts the number of rotations, which calculates wind speed. It also measures wind pressure.
- Water Level Recorder (WLR) – A tide gauge that is placed in a protective sleeve and located on the seabed next to the anchor of the FLS and recovered along with the FLS mooring after use.

- Weather sensor – the weather sensor will measure wind speed and direction. Weather sensors can also measure precipitation, barometric pressure, temperature and relative humidity.
- Current sensor - Collects data on currents and turbulence, plus wave height and direction. It will be attached to the FLS mooring line and fitted to the FLS approximately 3m below sea level. Water current and temperature is also collected with the current sensor over a 10-minute average.
- Turbidity sensors - Deployed underwater to measure the clarity of water in relation to water quality.
- Data loggers – Collect and store all raw and transmitted data from all sensors across the buoy.
- Bird monitoring cameras – Panoramic and dome cameras will be mounted on the FLS to record movements of birds in the area.

Additional FLS components are two flexible reinforced power systems, each comprising sufficient solar and wind generation to power the buoy continuously, even in the event of no recharging for up to 12 days.

The FLS comprises three parts; hull, lower structure and upper structure. They will be transported to site separately and all three parts of the FLS will be assembled for deployment (Photo 1.1).

1.3.1.2 Wave Buoy

The wave buoy heave, pitch and roll are continuously sampled to measure wave height, period and direction for waves (Photo 1.2). Raw data is stored within the buoy logger for completing spectral analysis to derive the directional wave spectrum. The satellite data transfers to the RPS data cloud every 30 minutes.

Photo 1.1 *Deployed FLS buoy (RPS, 2024)*

Photo 1.2 *Datawell Directional Wave Rider (DWR) (Datawell BV 2024)*

1.3.2 Deployment and Installation

The notional installation locations of the FLS and wave buoy are presented in Figure 1.2. The FLS is planned to be centrally located in the FLA (38° 33’ 44.718”S, 147°12’ 29.258”E) and the wave buoy is planned to be located in the deepest section of the FLA (38° 38’ 24.78”S, 147° 14’46.745”E), or within 500m of these locations within the FLA.

As a result of feedback from a commercial fisheries representative, there is a possibility that the preferred locations for the FLS and wave buoy may conflict with their functions and activities. If that is the case, Blue Mackerel may move the installation locations to be elsewhere within the FLA, but ideally within the 500m radius around the proposed locations, within which the infrastructure may be installed. The proposed locations will continue to be within the FLA and no closer than 1km from the shipwreck *SS Glenelg.*

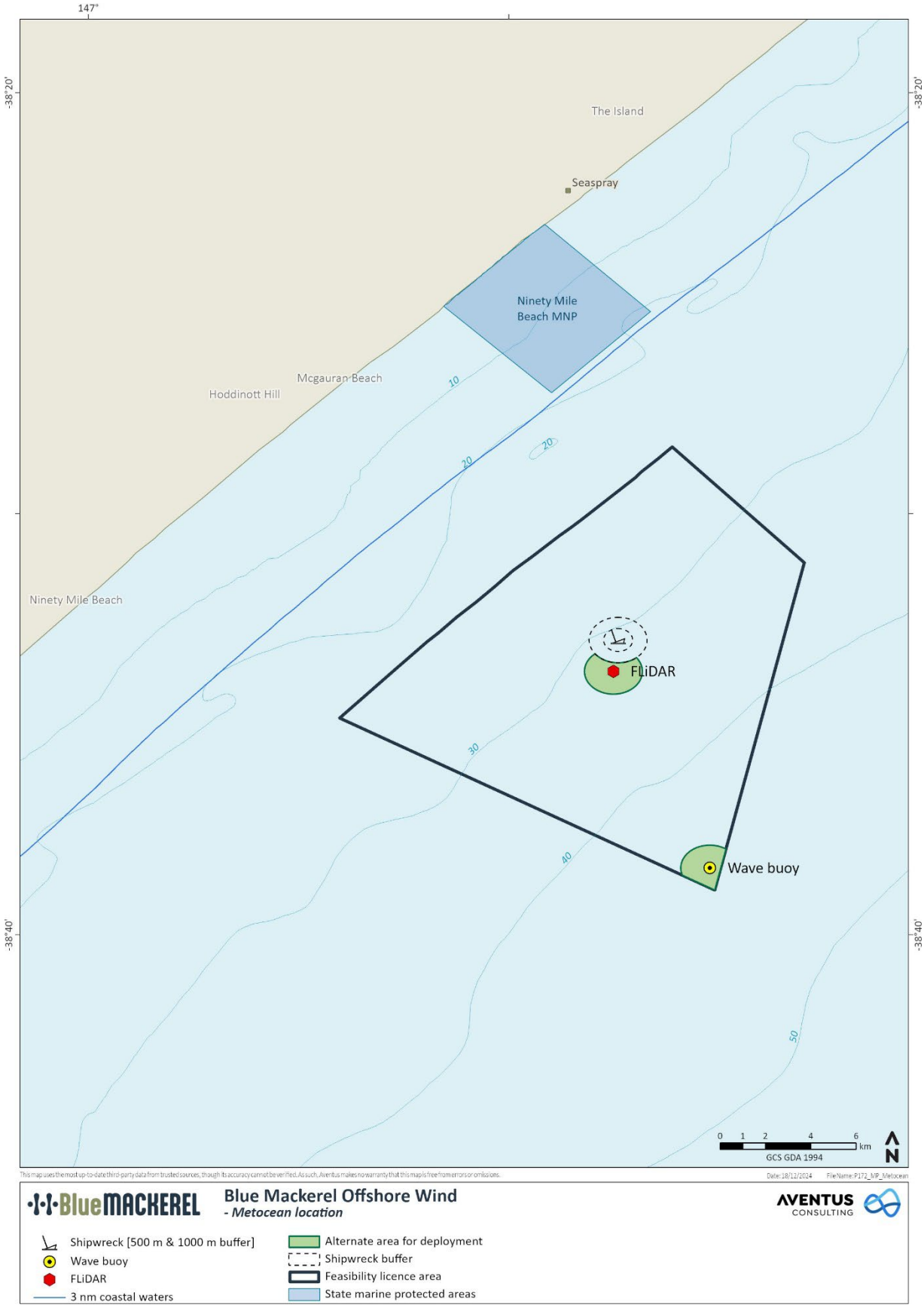

Figure 1.2 *Intended locations of FLS and wave buoy deployment*

1.3.2.1 FLS deployment and installation

The FLS will be prepared and tested prior to deployment and installation. The process will include:

- Construction of the buoy;
- Power and testing of the buoy;
- Complete a site acceptance test; and
- Installation of the keel.

With the buoy prepared for deployment, the following steps are taken to deploy the FLS on location:

1. Transport FLS to the wharf;
2. Lift the FLS to the water with use of a crane;
3. Prepare the vessel for deployment and towing;
4. Tow the FLS to site;
5. Deploy the FLS once in the FLA; and
6. Service the FLS (Section 5.1).

Once the FLS has been towed to site, the following steps will occur:

1. Pull the tow rope in;
2. Connect rubber cords of mooring;
3. Slowly let out the mooring / let out mooring;
4. Connect to crane;
5. Remove safety pin from release;
6. Crane out the mooring;
7. Lower mooring into the water and release;
8. Let out anchor and lower anchor chain into the water;
9. Lower anchor chain into the water and release to seabed; and
10. Confirm acoustic releases are functioning and the FLS is deployed.

The mooring design comprises a singular anchor chain assembly, 2 floats, 2 mooring chains, 3 rubber cords, 3 safety lines and 1 mooring rope, as shown in Figure 1.3. The mooring equipment and components are described in Table 1.5 in more detail.

Specialised software will be used to model the dynamic forces for mooring tension, buoy submersion, tilt and excursion. Wind, wave, water level, current and various other atmospheric parameters have been taken into account in the mooring design.

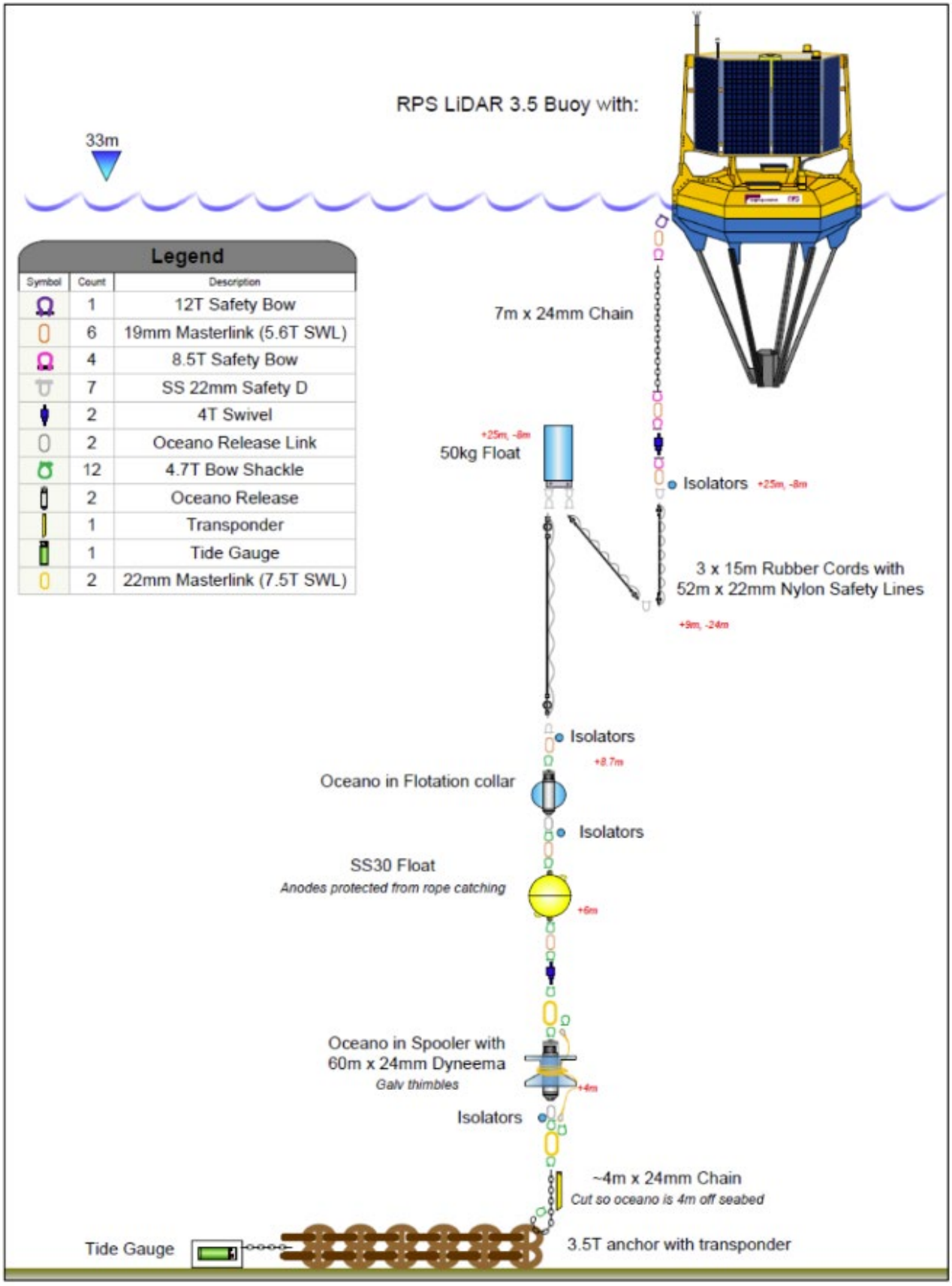

Figure 1.3 *Mooring design of the FLS*

1.3.2.2 Directional waverider buoy deployment and installation

Prior to deployment, an in-house calibration of the heave sensor will be performed. Functional checks are conducted on the compass, pitch and roll sensors, heave platform offset and acceleration outputs to ensure that they are operating correctly within set limits as specified by the manufacturer.

One DWR supported by a singular anchor 1 float, 2 mooring chains, 2 mooring ropes and 2 rubber cords (with a safety line) will be deployed to gather wave data within the FLA (as shown in Figure 1.4). Table 1.5 describes the mooring components and equipment in more detail. In comparison with the FLS, the DWR will be taken to site onboard the vessel and lifted by crane into the water instead of being towed to site. The DWR will be taken onboard the same vessel that is towing the FLS and be deployed in the same site visit. Further details on the deployment process are as follows:

1. Attach DWR to vessel crane hook;
2. Remove release pin;
3. Crane the mooring out above the water;
4. Lower DWR into the water and pull the release pin;
5. Slowly pay out the rubber cords and mooring rope;
6. Connect the line to the crane with acoustic release attached;
7. Remove the safety pin from the acoustic release;
8. Crane the mooring out above the water;
9. Lower the mooring into the water and release;
10. Let out the anchor and lower anchor chain into the water;
11. Lower anchor chain into the water and release to the seabed; and
12. Confirm the acoustic releases are functioning and the DWR is deployed.

A comprehensive mooring design report has been provided by the contractor for the DWR. Details of the mooring design and considerations are the same as those described in Section 1.3.2.1 for the FLS.

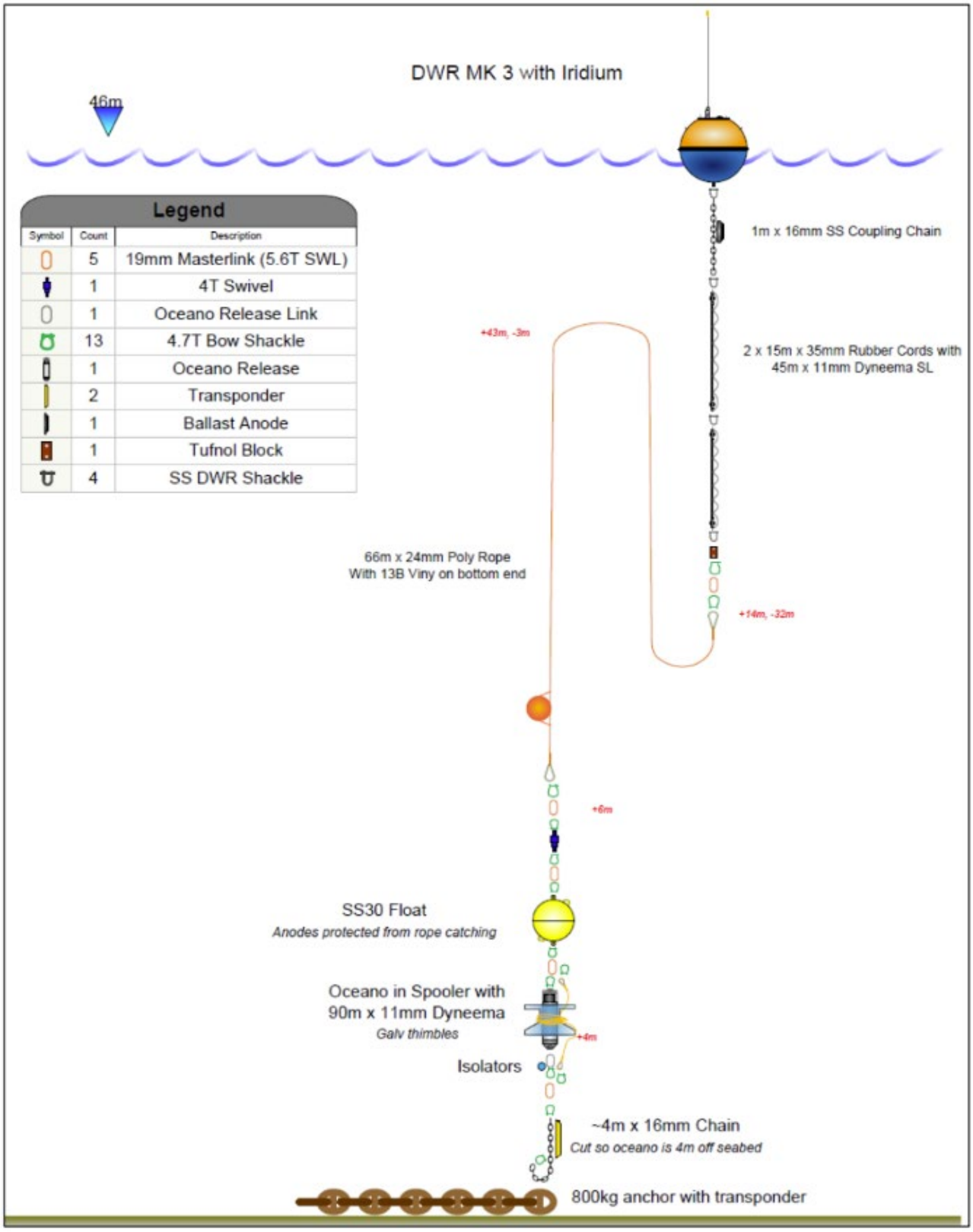

Figure 1.4 *Set up of DWR*

1.3.2.3 Vessels for deployment

The selection of the deployment vessel is yet to be finalised, however it is likely to be a vessel similar in specification to the *Leaders Creek* vessel, with the typical vessel parameters outlined below:

- Maximum speed: 9kt – 23kt;
- Maximum length: 21m – 81m; and
- Maximum gross tonnage: 134t – 341t.

Barry Beach Marine Terminal, located in Corner Inlet, or Lakes Entrance are the ports that are anticipated to be used noting that the FLS and the DWR will be deployed at the same time using the same vessel. It is likely that the same or similar vessel will be used for both the deployment and the recovery of the equipment.

1.3.3 Data Acquisition

RPS DataFeeds is software that can access the data directly collected from the sensors on FLS and wave buoy. RPS will provide monthly reports to Blue Mackerel. For the floating LiDAR and wave buoy, data will be regularly updated to the cloud.

1.3.4 Timing

Deployment of all the metocean equipment is scheduled to occur in the first quarter (Q1) of 2025 with all equipment deployed for a minimum of one year and a maximum of three years.

1.4 Geotechnical Investigations

In accordance with Regulation 77(1)(a) of the OEI Regulation, this section summarises the locations, layout and operational details of the proposed geotechnical investigations and equipment.

Blue Mackerel is proposing geotechnical investigations over two phases (Section 1.4.5). The first phase is planned to take place in Q1 2025 and is detailed within this section. Details of the second phase will be covered within a revision or amendment to the MP or be the subject of a new MP.

1.4.1 Investigation Techniques

The proposed geotechnical investigation techniques will include the following:

- Cone Penetrometer Tests (CPT)
    - Downhole CPT - Downhole CPT involves the in-situ measurement of the resistance of ground to continuous penetration. This process involves pushing an instrumented cone into the seabed at a controlled rate (typically 2cm/sec). Key measurements collected during the test include cone tip pressure, sleeve friction, pore pressure and tilt angle.
    - 2D seismic downhole CPT - 2D seismic downhole CPT has the cone equipped with geophones or accelerometers to measure seismic wave velocities. This will evaluate soil stiffness, dynamic soil behaviour and seismic site response.
- Borehole coring - For borehole coring, wireline-deployed hydraulically operated push or piston samplers will be used to recover high quality samples. The variations of borehole sampling are continuous sampling, rotary coring and shallow coring.

- Seabed grab sampling - At each location where a core sample is being taken, a soil grab sample may also be taken for geological analysis. Grab sampling may also be undertaken in other areas within the FLA depending on the geophysical results
- In situ thermal conductivity tests - These tests accurately estimate the specific thermal capacity of the soil. These tests shall be executed as soon as possible after the samples have been retrieved on deck.

A simplified pictorial representation of geotechnical investigation techniques is provided in Figure 1.5 and the anticipated design of the preliminary geotechnical investigations is summarised in Table 1.3.

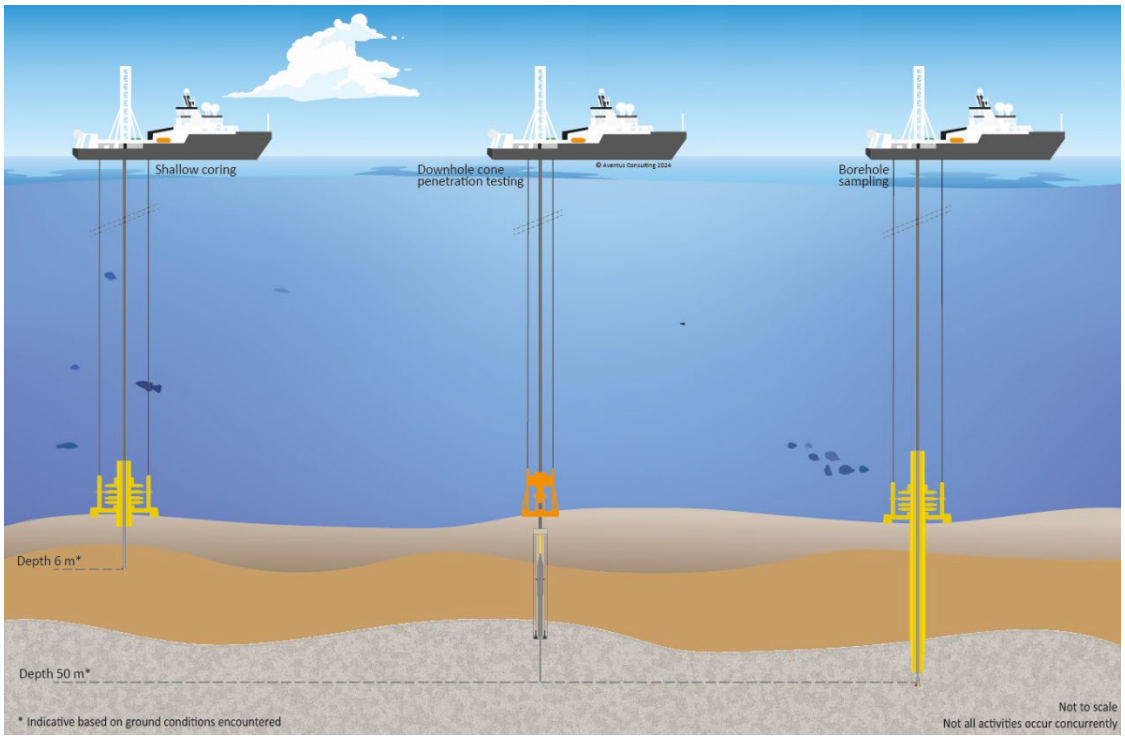

Figure 1.5 *Proposed seabed penetration testing inclusive of shallow CPT, downhole CPT and borehole sampling.*

1.4.2 Geotechnical Investigations Operations

1.4.2.1 Vessel

The geotechnical scope has been awarded to Fugro, who plans to use a specialised geotechnical vessel. The vessel will hold station using dynamic positioning (DP), propellers or via a four-point mooring system. No refuelling will occur on site. The vessel will bunker with marine diesel while in port.

A weather forecasting service (which provides a look-ahead several days out) will be used to ensure that the vessels are not mobilised immediately prior to forecasted poor weather, thus minimising the need to seek safe shelter and arrange crew transfers.

1.4.2.2 Drill Cuttings and Fluids

Cuttings are discharged directly to the seabed during CPT and borehole sampling. Drill cuttings are inert pieces of rock, sand and other particles removed from the borehole during the sampling process ranging in size from very coarse to very fine particles.

All drilling fluid additives have low eco-toxicity rating, with only ‘Gold’ or ’Silver’ (CHARM) or ‘D’ or ’E’ (non-CHARM) to be used, as rated by the Offshore Chemical Notification Scheme (OCNS).

1.4.2.3 Testing

Laboratory analysis of the nature and composition of seabed sediments is planned to be undertaken in an onshore laboratory, however various preliminary logs and checks will be done onboard the geotechnical vessel where possible. All tests will be performed according to relevant Australian, British or ASTM standards, or other recognised procedures.

1.4.3 Geotechnical Summary

Table 1.3 provides a summary of the proposed geotechnical investigation design. Figure 1.6 illustrates the indicative (i.e., notional and unconfirmed) locations of the deep borehole (red) and shallow borehole (blue) sample sites. If the geophysical results indicate that these indicative locations for borehole sampling are not suitable, the indicative locations may change, but will remain within the FLA.

Table 1.3 *Summary of geotechnical investigation design*

Sampling method	Planned samples	Depth of penetration (m)	Water depth Mean Sea Level Range (m)
Downhole SCPT	5	50	24-45
Deep borehole coring	5	50	24-45
Shallow borehole coring	13	6	24-45
Seabed grab samples	20-25	Less than 1m	24-45

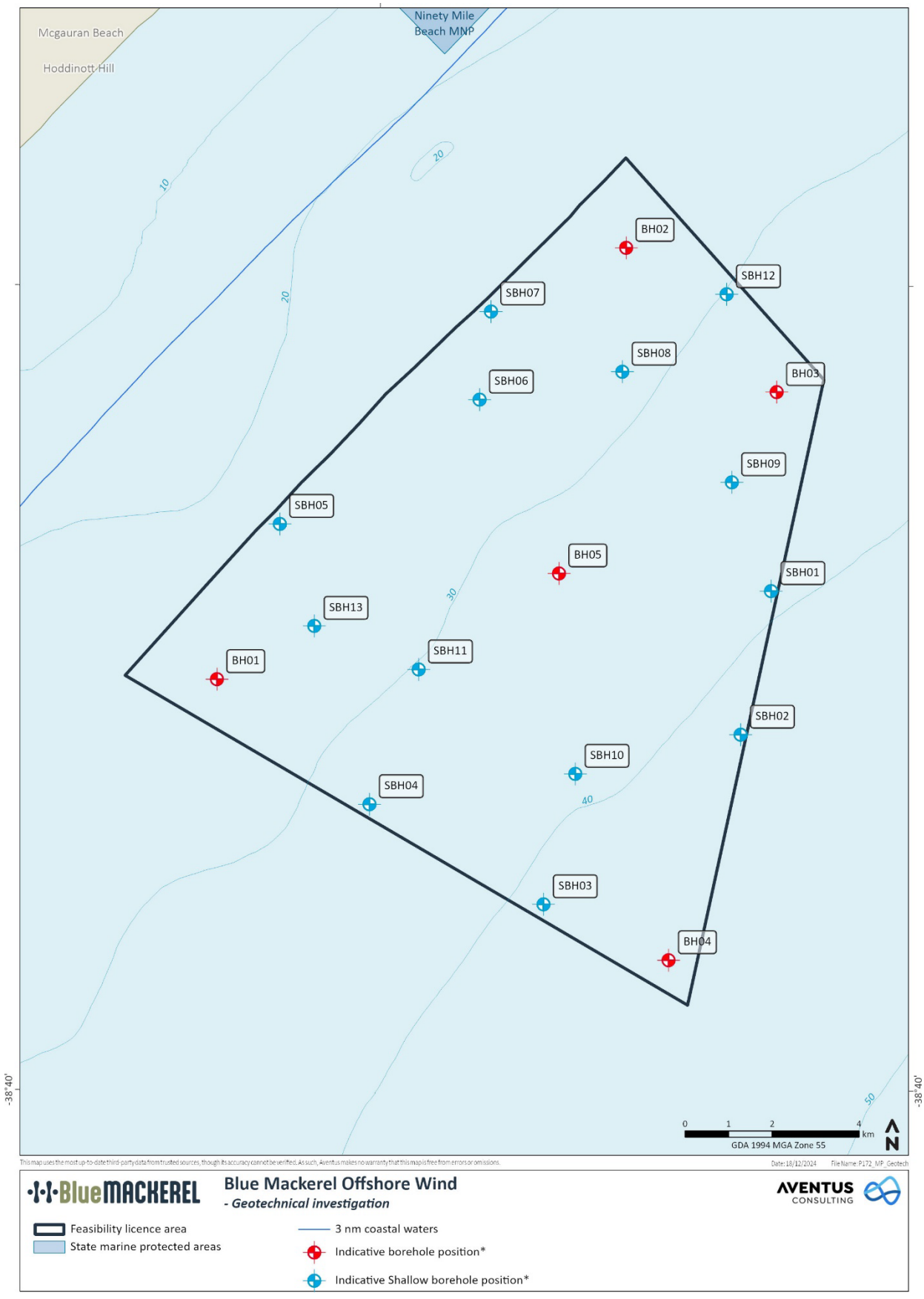

Figure 1.6 *Indicative locations of the borehole sampling sites*

1.4.4 Sequence of Geotechnical Investigations

The geotechnical campaign comprises many steps with various techniques (Section 1.4.1), including:

1. Mobilisation of offshore crew and company representatives;
2. Crew and representatives will conduct project inductions while vessel is in port;
3. Pre-checks of geotechnical equipment onboard;
4. Vessel in transit to sample locations within FLA;
5. Deploy geotechnical equipment in proposed location (Figure 1.6) and use DP to stay within location;
6. Collect samples and safely store onboard;
7. Recover equipment and transit to the next proposed location (Figure 1.6);
8. Repeat steps 4 – 6 until all 13 shallow coring samples and 5 borehole samples are collected; and
9. Transit back to port.

1.4.5 Timing

The timing and duration of the geotechnical investigations is shown in Table 1.4.

Table 1.4 *Timing and duration of geotechnical investigations*

Investigations	Expected commencement	Duration
Geotechnical	Phase 1: Q1 2025	4 weeks
	Phase 2: Q1 2028*	18 weeks

**Commencement of phase 2 is subject to approval of a revised/amended version of the MP or the approval of a future MP.*

1.5 List of Relevant Equipment

In accordance with OEI Regulation 77(1)(a), this section summarises a list of equipment used for the licence activity. Table 1.5 outlines the list of equipment that will be deployed for the licence activity.

1.6 Environment Description

In accordance with OEI Regulation 77(1)(a), a description of the existing environment can be found in Section 6 of Attachment A of the Marine surveys EPBC Act Referral (2024/09934).

Table 1.5 List of relevant equipment

Equipment	Number	Description
FLS		
Buoy	1	See Section 1.3.1.1 for a more detailed description of the FLS buoy and its components.
Anchor chain	1	One anchor chain will be used to support the FLS buoy.
Mooring chains	2	Two mooring chains will be used to attach the FLS to the anchor chain.
Mooring rope	1	1 mooring rope will be used which is attached to the main anchor via a rope spooler to facilitate recovery of the anchor.
Rubber cords	3	Three rubber cords will be used to attach the FLS to the anchor block. Rubber cords reduce mooring 'snap' loads and provide the buoy with enough mooring capacity to follow the waves without submersion.
Safety lines	3	Three safety lines are used n combination with the rubber cords to act as a safety in case a rubber cord fails.
Floats	2	Two floats will be used to support the mooring chains and rubber cords to ensure they are kept in place.
Tide gauge	1	The tide gauge, also known as a WLR, is placed in a protective sleeve and located on the seabed next to the anchor.
Flotation collar	1	A flotation collar equipped with an acoustic release is used to remove the requirement for any additional flotation above.
Transponder	1	Attached to the anchor to allow for precise location of the anchor chain in case of mooring failure.
DWR		
DWR	1	The Datawell DWR MK3 will be deployed.
Anchor chain	1	One anchor chain will be used to support the DWR.
Mooring chains	2	Two mooring chains will be used to attach the DWR to the anchor chain.
Rubber cords	2	Two rubber cords will be used to attach the DWR to the anchor chain.
Safety line	1	A safety line is attached to the rubber cords in the event of a breakage.
Mooring ropes	2	One poly rope will be used to attach the DWR to the anchor chain. A second Dyneema rope is attached to the anchor via a spooler to facilitate the recovery of the anchor chain.
Float	1	One float will be used to support the mooring chains, poly rope and rubber cord to ensure they are kept in place.
Transponder	1	Attached to the anchor chain to allow for precise location of the anchor chain in case of mooring failure.
Geotechnical equipment		
Seabed frame	1	A seabed frame will be deployed on the seabed to support the geotechnical investigations (during CPTs, deep coring, and shallow samples). Section 1.4.1 describes the seabed frame in more detail.
Grab sampler	1	A grab sampler will be deployed to the seabed as part of the geotechnical investigations. Section 1.4.1 describes seabed grab sampling more detail

2 Stakeholder Engagement

In accordance with Regulation 77(1)(b) and (c) of the OEI Regulations 2024, this section summarises the consultation and stakeholder engagement undertaken.

2.1 Scope of the activities subject to consultation

The scope of activities subject to consultation for the MP include marine investigations that make contact with and penetrate the ocean floor within the FLA as outlined in Section 1.2.

This section sets out how Blue Mackerel has consulted in accordance with the licence conditions and the OEI Act and Regulations.

In accordance with OEI Regulation 82 a stakeholder engagement strategy has been implemented to identify and consult persons, organisations, communities and groups (stakeholders) in relation to the licence activities, and addresses the requirements set out in OEI Regulation 82(2). The stakeholder engagement strategy will be published on the Blue Mackerel's website within 30 days of the MP being approved. It will be kept up to date and remain on the website until Blue Mackerel ceases to hold the licence.

2.1.1 Consultation objectives and activities

A thorough and targeted consultation process was held over a minimum nine-week period to support the development of the MP. An overview of the consultation process is shown in Figure 2.1.

The consultation objectives and activities are shown in Table 2.1.

Table 2.1 *Consultation objectives*

Objective	Activities
Education and information	• Ensure all stakeholders (including the community) are informed about the project, the process, and their opportunities to provide input and feedback. • Provide information about the project using clear, concise, and culturally appropriate language and relevant imagery to aid understanding.
Meaningful consultation	• Work with Registered Aboriginal Parties (RAPs) and Traditional Owners to understand their aspirations for their Country and peoples, and potential economic and community contribution to the project.[1] • Work with stakeholders to discuss the project and identify issues and opportunities. • Provide opportunities for community members to identify themselves as interested stakeholders and participate in engagement activities. • Provide answers to stakeholder queries in a timely manner or advising when information would be available to answer questions. • Be proactive when issues arise to ensure stakeholder groups and the community have correct information and the opportunity to voice their concerns.

[1] It is important to note that Table 2.1 is an extract from the EPBC Referral and consultation since the submission of the EPBC Referral has resulted in a refinement of this objective to the following: 'Work with Registered Aboriginal Parties (RAPs) and Traditional Owners to understand their aspirations for their Country and peoples, and potential economic and community contribution to the project for mutual benefit'.

Objective	Activities
	• Create and maintain quality working relationships with key stakeholders and the community.
Close the loop	• Demonstrate how stakeholder feedback has been heard, considered, and used to inform the development of the project and communicated back to the community. • Provide feedback to stakeholder groups and the community about the outcomes of engagement activities. • Ensure the principles we have established for stakeholder and community engagement guide project decisions, approaches, and engagement execution.
Rights-based	• Take guidance from the RAPs and Traditional Owners on consultation approaches and on stakeholders to be consulted. • Consult and cooperate with RAPs and Traditional Owners in ‘good faith’ to obtain ‘free, prior, and informed consent’. • Obtain consent or approval from RAPs and Traditional Owners of any inputs to any project outputs before their issue.

2.1.1.1 Consultation Process Diagram

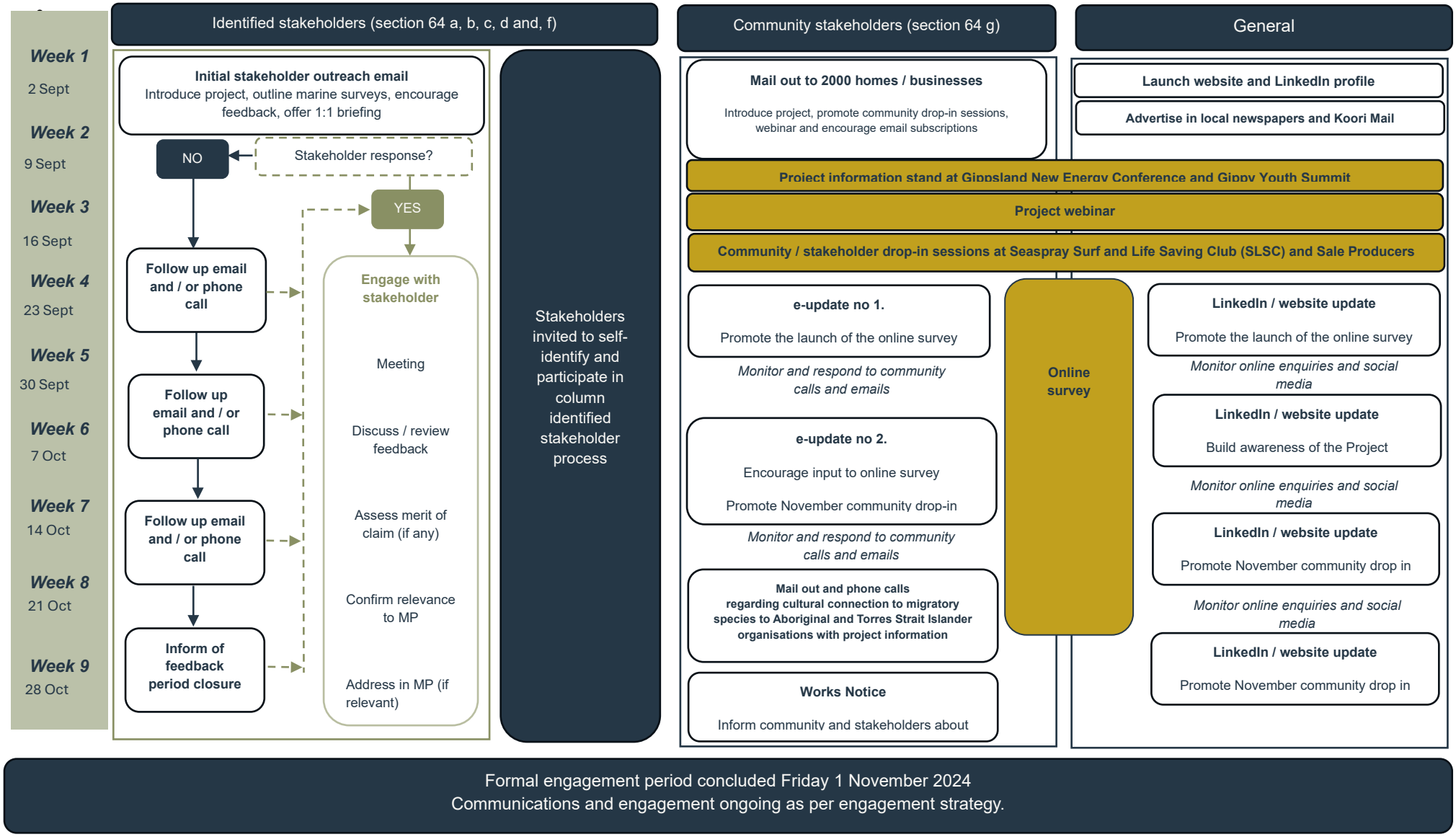

Figure 2.1 *Consultation process diagram*

2.2 Consultation undertaken in preparation of Management Plan

2.2.1 Process used to identify stakeholders to be consulted

For the purposes of the MP, stakeholders were identified in accordance with:

- OEI Regulation 64; and
- Feasibility Licence FL-001, Condition 3.

The process outlined in Figure 2.2 was used to identify stakeholders in each of the required categories outlined in OEI Regulation 64.

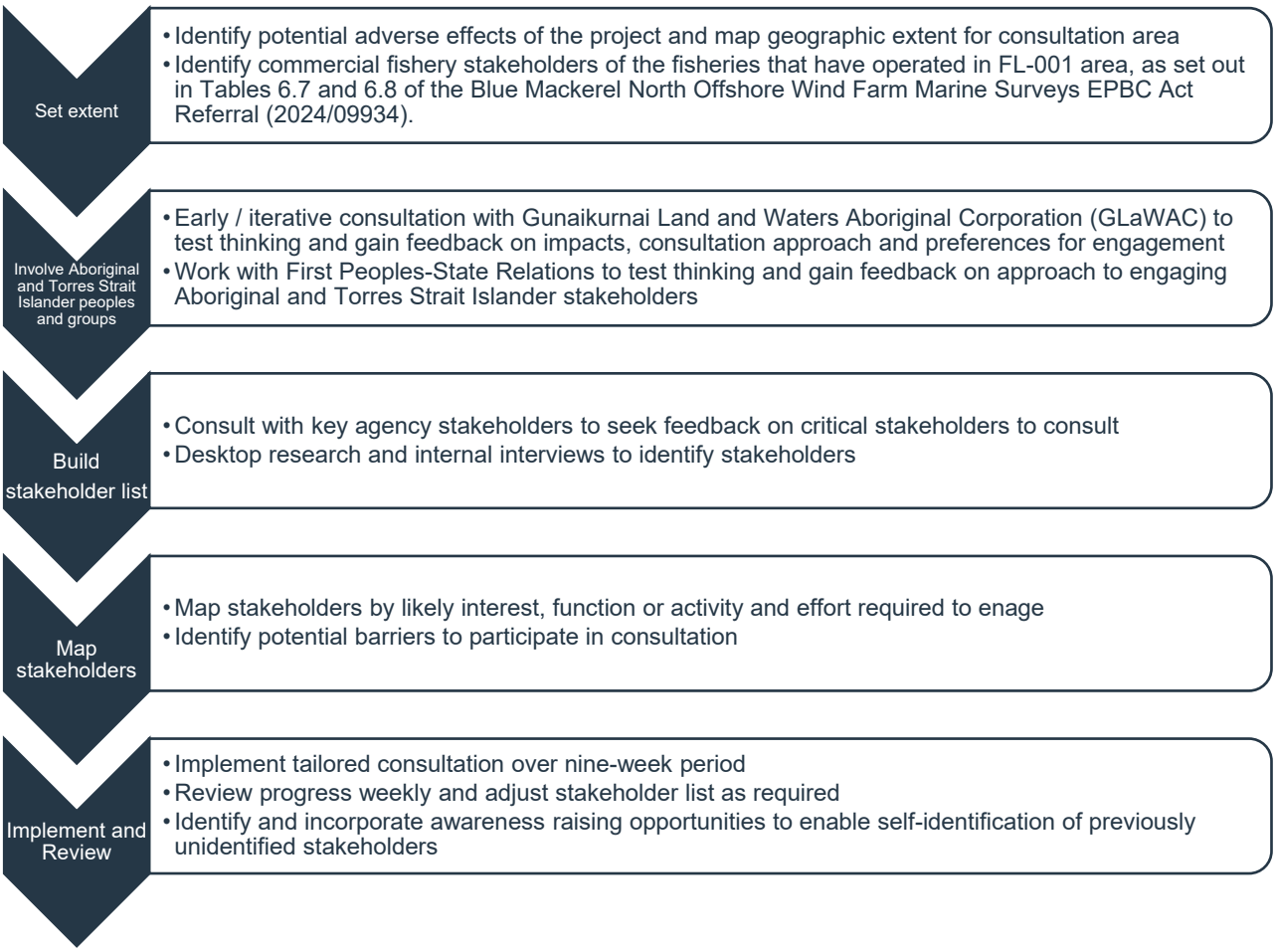

Figure 2.2 *Overview of the process undertaken to identify stakeholders*

2.2.1.1 Desktop approach to identify stakeholders

Detailed desktop research and initial consultation with key agency stakeholders assisted in identifying stakeholders. Blue Mackerel will continue to add to its stakeholder list as new information emerges. A list of stakeholders is presented in Table 2.3.

Stakeholders were identified (and will continue to be identified) through the following key sources:

- Prior knowledge of stakeholder groups from other projects.

- Consultation with government agencies.
- Online searches.
- Publicly available plans and referrals.
- Traditional and social media scanning.
- Seeking recommendations from stakeholders.
- Stakeholders making themselves known to the project.

2.2.1.2 Identification of commercial fishery stakeholders

Commercial fisheries that have operated in FL-001 were identified in the Blue Mackerel North Offshore Wind Farm Marine Surveys EPBC Act Referral (2024/09934). Fishery associations and organisations that represent concession or permit holders were identified using desktop research, focussed initially on the Victorian Fisheries Authority (VFA) and the Australian Fisheries Management Authority (AFMA).

The following associations/organisations were identified:

- Commonwealth Fisheries Association (CFA)
- Southern Squid Jig Fishery
- Southern Shark Industry Alliance (SSIA)
- South East Trawl Fishing Association (SETFIA)
- Abalone Council Victoria
- Bass Strait Scallop Industry Association
- Seafood Industry Victoria (SIV)
- Victorian Rock Lobster Association (VRLA)
- Eastrock
- Commonwealth Fisheries Association (CFA)
- San Remo Fishermen's Co-op (SRFC)
- Lakes Entrance Fishermen's Cooperative (LEFCOL)

Blue Mackerel will continue to identify commercial fisher stakeholders in the future.

2.2.1.3 Geographic distribution of stakeholders

The purpose of consultation was to gain input from individuals, groups and authorities who are potentially affected by the activities under the MP. Any risks and impacts identified can then be assessed and reduced to an acceptable level.

The requirement of the Regulations to consider stakeholders that the 'licence holder reasonably considers may be directly affected by the activities subject to consultation' meant that stakeholders from a wide geographic area were introduced to Blue Mackerel through direct and indirect engagement and communications activities.

As illustrated in Figure 2.3, Blue Mackerel considered stakeholders distributed geographically across Victoria, the south coast of New South Wales and northern Tasmania. These stakeholders included Aboriginal and Torres Strait Islander peoples and communities that were either known to have or may have a cultural connection to a species and/or the Sea Country that may be affected by the activities under the MP. These stakeholders included Aboriginal and Torres Strait Islander Traditional Owner representative organisations, native title holders and claimants, and community-controlled organisations.

2.2.1.4 Identifying stakeholders in the future

The process of identifying and consulting with stakeholders will be ongoing throughout different stages of the Blue Mackerel Project.

The Stakeholder Engagement Strategy to be published for implementation of the activities in the MP will include a process to identify stakeholders in the future, and consultation will be undertaken with such stakeholders before commencement of the licence activities and during the licence activities in accordance with the Regulations.

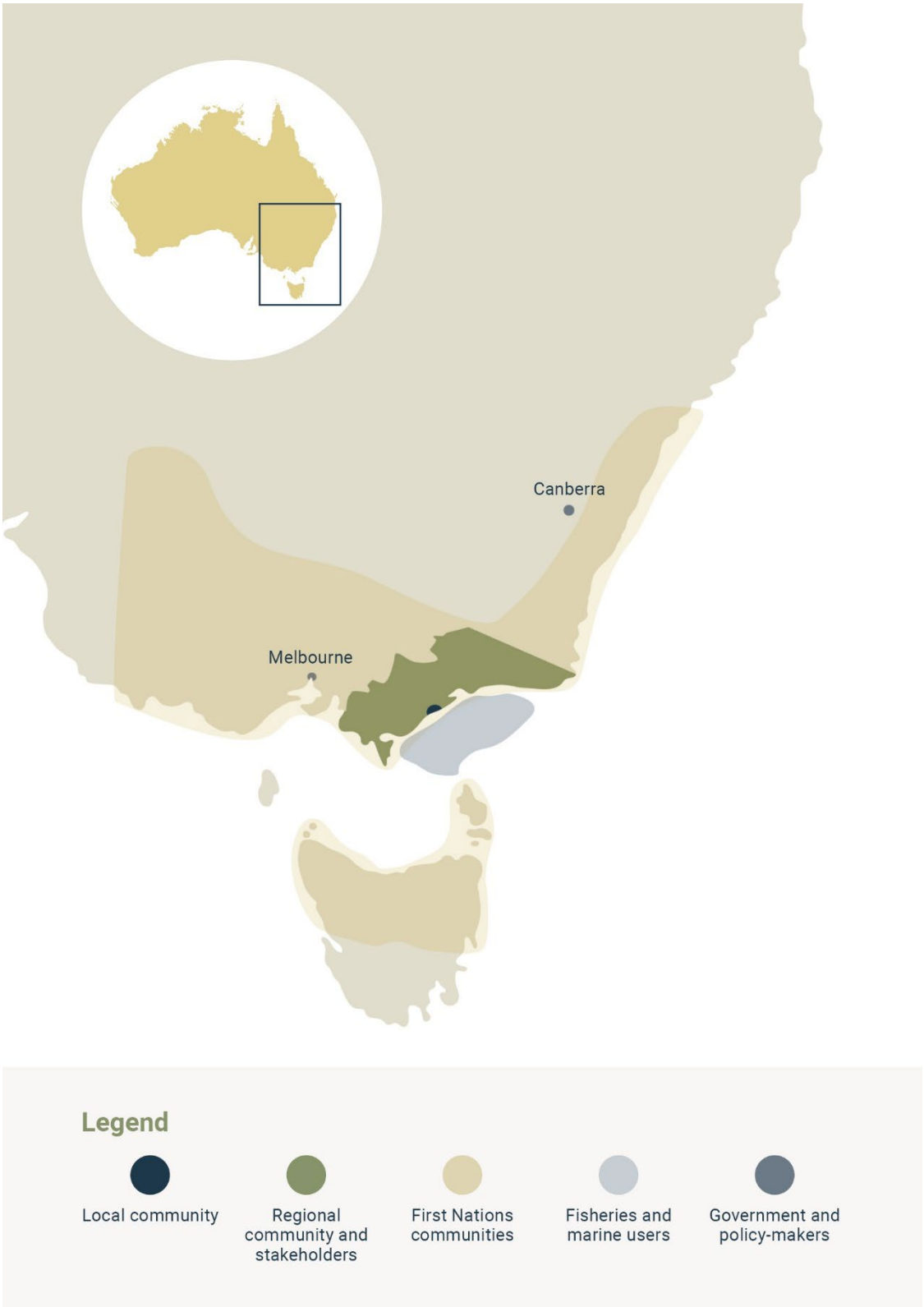

Figure 2.3 *Geographic extent of the consultation outreach*

2.2.2 List of identified stakeholders and/or representative bodies consulted

Table 2.3 lists the stakeholders consulted regarding the activities under each of the required categories of OEI Regulation 64.

Some stakeholders who were consulted during the MP consultation are listed in Table 2.3 as 'additional stakeholders' being engaged as part of the project that do not require specific engagement as defined in Section 64 of the OEI regulations. These stakeholders were also invited to participate in MP consultation.

Table 2.2 *Stakeholder list and category*

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	**List of identified stakeholders**
Condition 6, Item 1, Column 2 (a)	• Department of Defence
Condition 6, Item 2, Column 2 (a)	• Bureau of Meteorology • Director of National Parks • Australian Maritime Safety Authority • Titleholders of any existing petroleum or greenhouse gas titles issued under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* whose title area overlaps with the licence area – See Table 2.2, Part B (e).

Condition 6, Item 3, Column 1 (c) and Column 2 (a)	• See Section 2.2.1 and Table 2.2 Part B (h) for identification of commercial fisher rights holders in accordance with licence conditions, specifically:
	  ○ fishing concession or permit holder that has nominated a representative organisation for the purpose of consultation
	  ○ fishing concession holder under the *Fisheries Management Act 1991* or permit holder under the *Fisheries Act 1995* (Vic).

Stakeholder category **Part B: (OEI Regulation 64)**	**List of identified stakeholders**
a) Department of State, agency or authority of the Commonwealth, a State or a Territory that has functions that relate to the activities subject to consultation	**Australian government** • Minister for Climate Change and Energy • Department of Climate Change, Energy, the Environment and Water (DCCEEW) • Offshore Industry Regulator (OIR) • Department of Defence • National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) • National Offshore Petroleum Titles Administrator (NOPTA) **Victorian government** • Minister for Energy and Resources • Minister for Environment • Department of Energy, Environment and Climate Action (DEECA) • Offshore Wind Energy Victoria (OWEV) • Environment Protection Authority (EPA) Gippsland • EPA Victoria • First Peoples – State Relations

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	List of identified stakeholders
	• Parks Victoria • Heritage Victoria • Regional Development Victoria • Department of Transport and Planning • Emergency Management Victoria • Safe Transport Victoria • State Emergency Services • Victoria Police (water police) **Local government** • Latrobe City Council • South Gippsland Shire Council • Wellington Shire Council **Agencies** • Australian Hydrographic Service • Gippsland Water • Ports Victoria **Authorities** • Gippsland Ports Authority • Victorian Fisheries Authority • West Gippsland Catchment Authority
b) Aboriginal or Torres Strait Islander people or groups that the licence holder reasonably considers may have native title rights and interests in relation to the licence area or areas of land or water that are adjacent to (i) the licence area	• Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)[2]
b) Aboriginal or Torres Strait Islander people or groups that the licence holder reasonably considers may have native title rights and interests in relation to (ii) areas of land or water that are adjacent to the licence area	• GLaWAC • Bunurong Land Council Aboriginal Corporation • Kurnai Aboriginal Corporation • Boonwurrung Land and Sea Council
c) Aboriginal or Torres Strait Islander organisations established under a law of the Commonwealth, a State or a Territory with functions related to managing for the benefit of Aboriginal or Torres Strait Islander people (i) land or water in or (ii) adjacent to the licence area	• GLaWAC • Gunaikurnai Traditional Owner Land Management Board[3] (managed by and engaged via GLaWAC)
d) Aboriginal or Torres Strait Islander organisations or groups that are parties to agreements related to land	• GLaWAC • Gunaikurnai Traditional Owner Land Management Board (managed by and engaged via GLaWAC)

[2] The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) is established under the Aboriginal Heritage Act 2006 (Vic).

[3] The Gunaikurnai Traditional Owner Land Management Board (GKTOLMB) is established under the Traditional Owner Settlement Act 2010 (Vic). It is important to note that GKTOLMB is managed by GLaWAC.

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	List of identified stakeholders
and water rights for Aboriginal or Torres Strait Islander people under the Native Title Act 1993 or any law of a State or Territory where the rights relate to land or water in or adjacent to the licence area	
e) the holder of any other licence granted under the Act	• Basslink / Australian Pipelines Association (APA) Group • Esso Australia • Palisade – Tasmanian Gas Pipeline • Marinus Link • High Sea Wind - EDP Renewables / Engie • Gippsland Skies – consortium comprising Mainstream Renewable Power, Reventus Power, AGL and Direct Infrastructure • Ørsted Offshore Australia (Gippsland 01) - Ørsted • Kut-Wut Brataulung - Southerly Ten • Star of the South - Southerly Ten • Gippsland Dawn - Blue Float Energy • Kent Offshore Wind - RWE • Ørsted Offshore Australia (Gippsland 02) - Ørsted • Navigator North - RES Origin • Greater Eastern Offshore Wind - Corio Generation • Aurora Green - Iberdrola
f) people or organisations that may carry out activities in or near the licence area for a commercial purpose, under a licence or permit issued under law	• APA • Abalone Council Victoria • Bass Strait Scallop Industry Association • CFA • Eastrock • LEFCOL • SRFC • Rock Lobster Resource Assessment Group (RLRAG) • SETFIA • Southern Shark Industry Alliance (SSIA) • Southern Squid Jig Fishery • Seafood Industry Victoria • VRLA • Port of Geelong • Port of Hastings Corporation • Port of Melbourne Corporation • Tasmania Ports / Port of Bell Bay • QUBE / Barry Beach • Basslink / APA Group • Esso Australia • Palisade – Tasmanian Gas Pipeline • Ørsted Offshore Australia (Gippsland 01) - Ørsted • Star of the South - Southerly Ten • Ørsted Offshore Australia (Gippsland 02) - Ørsted • Greater Eastern Offshore Wind - Corio Generation • Aurora Green - Iberdrola

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	List of identified stakeholders
g) communities (i) that are located adjacent to the licence area	**Local community and business within 30kms of the project FLA**: • Postcodes – 3851 and 3874 • Seaspray General Store • Townships: Airly, Giffard, Golden and Paradise Beach, Longford, Seaspray and Stradbroke **Aboriginal and Torres Strait Islander people, organisations or groups** • Moogji Aboriginal Council • Ramahyuck District Aboriginal Corporate • Lakes entrance Aboriginal Health Association • Gippsland and East Gippsland Aboriginal Cooperative **Special interest groups** • Scuba Doctor • Corner Inlet Connections • Gippsland Climate Change Network • Gippsland Environment Group • Southern Ocean Exploration • Birdlife Australia
g) communities (ii) that the licence holder reasonably considers may be directly affected by the licence activities	Aboriginal and Torres Strait Islander people, organisations or groups **Victoria** • Kurnai Aboriginal Corporation • Eastern Maar Aboriginal Corporation • Gunditj Mirring Traditional Owners Aboriginal Corporation • Wadawurrung Traditional Owners Aboriginal Corporation • Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation **Tasmania** • Tasmanian Aboriginal Centre • Flinders Island Aboriginal Association Inc • Melythina tiakana warrana Aboriginal Corporation • Six Rivers Aboriginal Corporation • Circular Head Aboriginal Corporation • Aboriginal Health Service - Tasmanian Aboriginal Centre (Launceston) • Cape Barren Island Aboriginal Association Community Health and Wellbeing Centre • Elders Council of Tasmania Aboriginal Corporation • Aboriginal Health Service - Tasmanian Aboriginal Centre Burnie • No.34 Aboriginal Health Service **New South Wales** • NTSCORP Limited • NSW Aboriginal Land Council Zone Office – Southern Region • Batemans Bay Local Aboriginal Land Council • Bega Local Aboriginal Land Council • Bodalla Local Aboriginal Land Council

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	List of identified stakeholders
	• Cobowra Local Aboriginal Land Council • Eden Local Aboriginal Land Council • Illawarra Local Aboriginal Land Council • Jerrinja Local Aboriginal Land Council • Merrimans Local Aboriginal Land Council • Mogo Local Aboriginal Land Council • Ngambri Local Aboriginal Land Council • Nowra Local Aboriginal Land Council • Ulladulla Local Aboriginal Land Council • Wagonga Local Aboriginal Land Council • Illawarra Aboriginal Medical Service Aboriginal Corporation • Katungul Aboriginal Corporation Regional Health and Community Services • The Oolong Aboriginal Corporation Inc.
h) any organisation representing recreational fishers whose activities the licence holder reasonably considers may be directly affected by the licence activities.	• VR Fish • Gippsland Lakes Fishing Club • South Gippsland Game Fishing Club • Loch Sport Fishing Association

Additional stakeholders being engaged as part of the project that do not require specific engagement as defined in section 64 of the OEI Amendment regulations	**Victorian Government**
	• VicGrid
	• Department of Jobs, Skills, Industry and Regions – Carbon Net
	• Country Fire Authority
	• Regional Roads Victoria
	Aboriginal and Torres Strait Islander people, organisations, or groups
	• Barengi Gadjin Land Council Aboriginal Corporation
	• Bunurong Land Council Aboriginal Corporation
	• Dja Dja Wurrung Clans Aboriginal Corporation
	• First People of the Millewa Mallee Aboriginal Corporation
	• Taungurung Land and Waters Council Aboriginal Corporation
	• Wamba Wemba Aboriginal Corporation
	• Yorta Yorta Nation Aboriginal Corporation
	Special interest groups
	• Committee for Gippsland
	• Destination Gippsland
	• Better Transmission Gippsland
	• Energy Innovation Cooperative
	• Gippsland New Energy
	• Wilsons Promontory stakeholders:
	  ○ Australian Conservation Foundation Community - Prom Area Climate Action
	  ○ Friends of the Prom
	  ○ Prom Campers
	  ○ Wilsons Prom Advisory Group
	• Surfers for Climate Change
	• Clean Energy Council

Stakeholder category Part A: (OEI Regulation 84, compliance with licence conditions)	List of identified stakeholders
	• Climate Change Council • Environment Victoria • Friends of the Earth • Greening Australia • Victorian National Parks Association (VNPA) • Surfriders Foundation • Voices of the Valley • Federation of Victorian Traditional Owner Corporations • Kinaway • Supply Nation • Gippsland Offshore Alliance (comprising Maritime Union Authority and Electrical Trades Union) • Australian Energy Producers (formerly Australian Petroleum Production and Exploration Association)

2.2.3 Details of information and time to respond

Blue Mackerel adopted the following parameters and process for its marine investigation consultation process:

- **Reasonable timeframe** - a minimum 30 calendar days was initially planned to give stakeholders time to provide feedback on the proposed marine investigations. This started on 2 September and ended on 11 October 2024. This was extended by Blue Mackerel by another three weeks to 1 November, totalling 60 calendar days. This was to give more time to consult critical stakeholders that were more difficult to reach. Overall, Blue Mackerel actively consulted over a period of nine weeks in the development of the MP. As part of ongoing engagement, stakeholders are continuing to be identified and engaged outside of the defined MP engagement period.

- **Sufficient information** – Blue Mackerel provided information about the project and marine investigations and potential adverse impacts of the marine investigations. All information was in clear, accessible language and formats including – introductory email / letters, project brochure, a marine surveys information bulletin, presentations, three e-updates, posters, and project website.

- **Stakeholders** – Blue Mackerel reached out to all stakeholders and communities as identified in Table 2.3 who may have interest in the marine investigations.

- **Collection notice** - all stakeholder collateral and documentation (including letters and brochures) included a statement that informs participants that they can request their information is not published. Those who opt out of publication are clearly recorded in the stakeholder database.

- **Building awareness of the Project to support self-identification** – Blue Mackerel has used a broad program of engagement and communication activities to build awareness of the project and proposed marine investigations. These activities encouraged people to reach out to project team to provide feedback via website, email and phone or to request a one-on-one briefing.

- **Respecting Aboriginal and Torres Strait Islander people, organisations and groups** – To be respectful of the time asked of and demand on these organisations to engage with Blue Mackerel (among the many other OWF proposals in Gippsland), the approach was tailored specifically to sharing information, seeking their feedback and asking for their assistance in sharing information with their networks.

2.2.4 Stakeholder Engagement Activities

An overview of the activities undertaken during the nine-week consultation period is listed below.

Paper-format and traditional media:

- Two thousand (2,000) local homes and businesses contacted via community mail-out to share project information and promote project launch and engagement events
- Three advertisements in local media (Gippsland Times, Sentinel Times and Gippslandia), and one advertisement in Koori Mail.
- One Project Brochure and two Information Bulletins prepared and distributed.

In person:

- Three days of engagement at an information stand at the Gippsland New Energy Conference and Gippy Youth Summit.
- Three community and stakeholder drop-in sessions in local community.

Online, including social media:

- Three e-updates to 285 stakeholders across 196 organisations, and targeted and bulk email distribution with project information attached.
- One dedicated marine survey page on the Blue Mackerel website.
- Fourteen responses to an online survey.
- One online webinar with project information with time for enquiries & recording available.
- One LinkedIn page with 392 followers with seven posts promoting the project and opportunities to engage.

To and with stakeholders:

- 41 stakeholder meetings and visits, including with Aboriginal and Torres Strait Islander people, organisations and groups.
- Four Offshore Gippsland advisory committees (meeting monthly) with all ten offshore wind developers and interface with DCCEEW, DEECA, VicGrid and OWEV.

To and with GLaWAC:

- One in-person stakeholder meeting to consult on the marine surveys, potential impacts and avoidance, mitigation, and management strategies.
- Phone calls, emails, and meetings to obtain advice on measures to address affects.
- Phone calls, emails, and meetings regarding the handling, management, and repatriation of the geotechnical samples as well as GLaWAC's potential involvement on-board the geotechnical survey vessel and in the laboratory at the opening and assessment of the core samples.

To and with Aboriginal and Torres Strait Islander people, organisations, and groups that are members of communities located adjacent to the licence area:

- Outreach engagement regarding cultural connection to a species and/or the Sea Country affected by the activities under the MP – phone calls, bulk email and printed packs for 28 Aboriginal community-controlled organisations (including a state-level peak representative body, Local Aboriginal Land Councils, and Aboriginal Medical Services), 11 Registered Aboriginal Parties (RAPs), and one Traditional Owner group/native title claimant.

Following the formal nine-week period, there has been continued effort to engage with marine survey stakeholders as a part of ongoing engagement and communication activities.

Additional activities since 1 November 2024 (up until lodgement of the approved MP) include:

- In-person events with other offshore wind proponents where all sessions included the latest Information Bulletins and both technical staff and the community engagement team:

    - Seaspray (Friday 8 November)
    - Traralgon (Thursday 14 November)
    - Foster (Wednesday 13 November)
    - Yarram (Saturday 23 November)
- LinkedIn posts – closing out in-person events and introducing new staff, sharing information about launch of geophysical surveys including videos
- The Blue Mackerel website was regularly updated between 1 November and 16 December, this included advertising the in-person events, uploading an Information Bulletin and Works Notification.
- A total of 17 additional stakeholder meetings including with Aboriginal and Torres Strait Islander people, organisations and groups.
- Activities to and with GLaWAC:
    - Ongoing phone calls, emails, and meetings to obtain advice on measures to address affects.
    - Ongoing phone calls, emails, and meetings regarding the handling, management, and repatriation of the geotechnical samples as well as GLaWAC's potential involvement on-board the geotechnical survey vessel and in the laboratory at the opening and assessment of the core samples.
- Activities to and with Aboriginal and Torres Strait Islander people, organisations, and groups that are members of communities located adjacent to the licence area:
    - One stakeholder meeting with the Bunurong Land Council Aboriginal Corporation.
    - One offer of a stakeholder meeting to the Boonwurrung Land and Sea Council.
- Activities to and with Aboriginal and Torres Strait Islander people, organisations, and groups that may be directly affected by the activities subject to consultation:
    - Ongoing outreach engagement regarding cultural connection to a species and/or the Sea Country affected by the activities under the MP.

Integrated communications and engagement program

An engagement program was delivered in accordance with the Marine Surveys Engagement Strategy and OEI Regulation 82.

2.2.5 Consultation response and outcomes

Overall, there were limited enquiries, claims or objections raised about any adverse impacts that licence activities might have on the stakeholders consulted.

For the limited claims raised (15 in total), Blue Mackerel carefully assessed the merits of the claim. Where the claims had merit, measures were adopted to address the claim. A mechanism was also established to evaluate the effectiveness of the measures adopted and whether they continue to address the claim. This evaluation is ongoing and periodically reviewed. All interactions, claims, and follow up actions (including evaluation) are logged in the dedicated stakeholder database Simply Stakeholders (SSTK) and alerts are set where appropriate.

The process flow shown in Figure 2.4 outlines the approach to assess the merits of claims for the purposes of consideration in the MP.

Should Blue Mackerel receive any further concerns or feedback regarding the MP following its submission to and acceptance by OIR, these will be managed as described in Section 2.3.

In order to ensure that Blue Mackerel is monitoring the effectiveness of measures in place to address claims raised, a systematic approach is used. This includes:

- Follow up actions are issued (with email notifications via SSTK) to relevant Blue Mackerel members to action commitments made in the response to any claim raised;
- A weekly review of outstanding actions is undertaken to ensure responsiveness and accountability to stakeholders; and
- Continued consultation with stakeholders that have raised claims with merits is being undertaken to continue to monitor and understand the claim itself, and the effectiveness of measures being taken.

Blue Mackerel is committed to ongoing monitoring of all control measures identified and implemented in response to stakeholder claims as per OEI Regulation 81(2)(f). Depending on the nature of the claim and corresponding control measure, Blue Mackerel will monitor effectiveness on an ongoing basis through project risk management procedures and ongoing engagement with stakeholders. Where necessary, control measures will be updated to respond to changing, evolving or emerging issues.

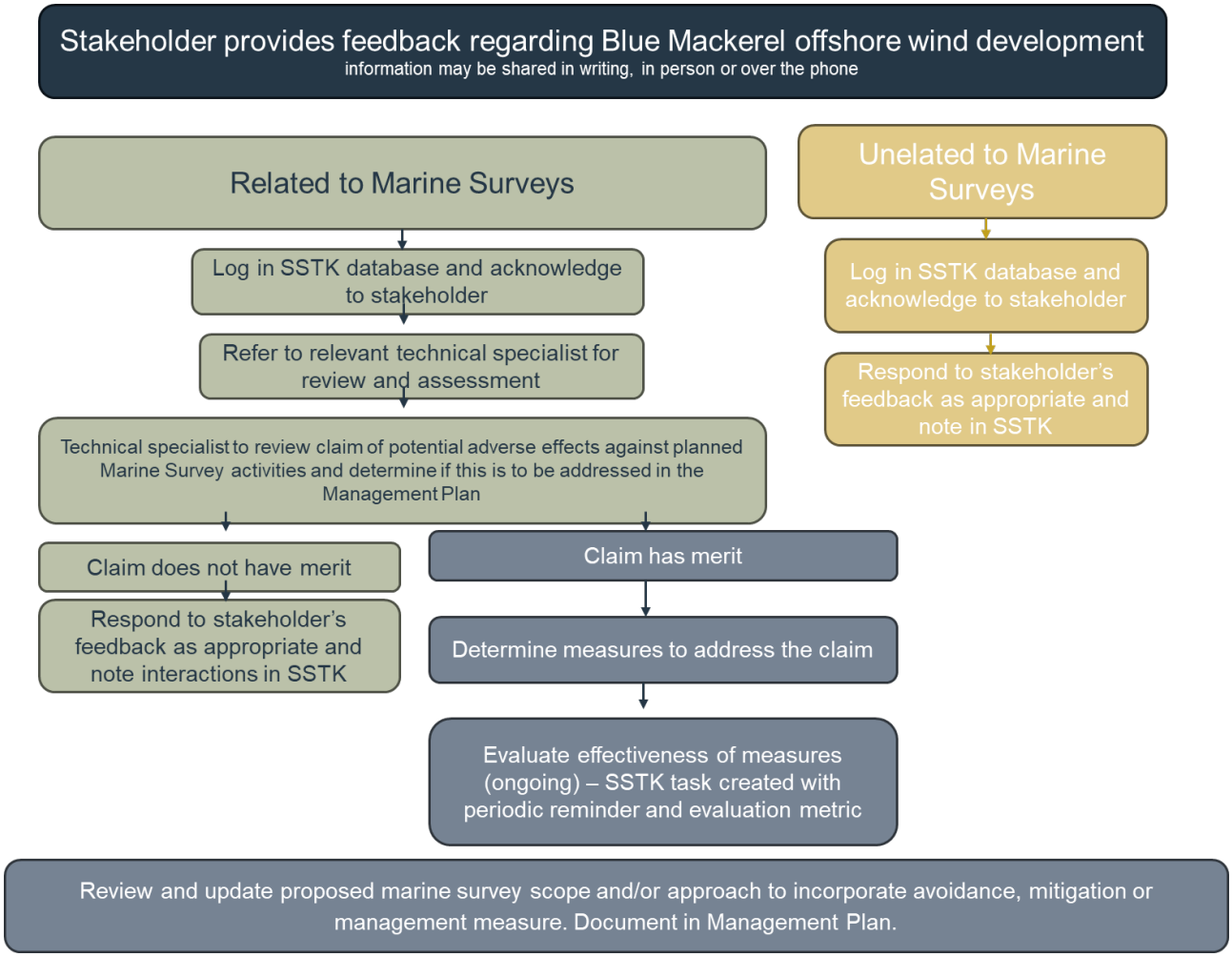

Figure 2.4 *Process flow for assessing claims and feedback*

2.3 Stakeholder Engagement Strategy for Ongoing Consultation

2.3.1 Future changes to the list of stakeholders

Future changes to the list of stakeholders may occur when:

- Periodic reviews of the Marine Surveys Stakeholder Engagement strategy are undertaken;
- The scope of MP activities are updated or change;
- New stakeholders identify themselves to Blue Mackerel; and
- Stakeholder changes occur (such as organisation mergers, name changes, the establishment of new organisations, changes in categorisation due to changes to an organisations' rights and interests and/or functions in relation to land or waters in or adjacent to the licence area, and so on).

The ongoing approach to stakeholder identification includes broad communications to promote self-identification of stakeholders.

2.3.2 Ongoing Consultation during delivery of activities outlined in this Management Plan

Blue Mackerel is committed to minimising any impacts of its licence activities. As part of this commitment, the community, ocean users, licence holders and key stakeholders will be kept informed of activities that may impact them.

The objectives of ongoing consultation are to ensure:

- Potentially impacted stakeholders are consulted as part of preparing activity methodologies;
- Stakeholders are informed of survey activities in advance;
- A consistent approach to the preparation and distribution of information; and
- Ongoing engagement activities for the project feed into the MP process and align with the broader Engagement Strategy.

Blue Mackerel understands the particular importance of ongoing consultation with Aboriginal and Torres Strait Islander stakeholders during the delivery of the activities outlined in the MP and the importance of this consultation continuing to be 'rights-based'.

2.3.3 Consideration of changes

Should there be changes to the MP, or activities planned, the list of stakeholders will be reviewed, and the category of each stakeholder also re-considered. Where changes are required, the corresponding communications and engagement will be planned for that stakeholder.

3 Other Conditions and Obligations

In accordance with OEI Regulation 77(1)(e), this section summarises the licence conditions that are applicable to the licence activities.

3.1 Relevant Obligations Under Licence Conditions

The licence conditions that are applicable to the licence activities are outlined in Table 3.1.

Table 3.1 *Licence conditions applicable to the MP*

Condition	Alignment
The licence holder is to assess the feasibility of the proposed commercial offshore infrastructure project described in the licence area.	Since the approval of the EPBC referral on 11 November 2024, Blue Mackerel has completed its geophysical investigations (13th November 2024 – 11th December 2024) within the FLA. The next phase of work to assess the feasibility of the FLA is the licence activity described in this summary MP (see Sections 1.3 and 1.4).
The licence holder must comply with any requirement to pay an amount of offshore electricity infrastructure levy.	The applicable levy for the MP has been paid.
The licence is subject to the conditions specified in section 6 of the Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022 (as at the day the licence was granted).	See Table 3.2.
The following people must comply with the MP for the licence, if there is one: a. the licence holder; b. any other person carrying out activities under the OEI Act of the licence on behalf of the licence holder.	Section 6.4 details the roles and responsibilities in accordance with the licence holder's management system to ensure compliance with the MP.
The licence holder must give reports to the Registrar or Minister in accordance with section 33 of the *Offshore Electricity Infrastructure Regulations 2022.*	Blue Mackerel will ensure reports are issued to the Registrar in accordance with Regulation 33A of the *Offshore Electricity Infrastructure Amendment Regulations 2024* (which repeals the 2022 regulations).

Table 3.2 outlines the conditions specified in section 6 of the Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022.

Table 3.2 *Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022 conditions*

Condition	Alignment
1. The licence holder must: a. in preparing a MP for the licence, consult with the Department of Defence to determine the potential impact of offshore infrastructure activities and other activities that are to be carried out under the licence on Defence operations and radar capability; and b. in the MP for the licence, address the outcomes of this consultation.	a. Consultation records confirm consultation took place with the Department of Defence. b. Consultation records outline the response and outcomes as a result of consultation with the Department of Defence.
2. The licence holder must: a. in preparing a MP for the licence, consult the following: i. the Bureau of Meteorology ii. the Director of National Parks iii. the Australian Maritime Safety Authority iv. titleholders of any existing petroleum or greenhouse gas titles issued under the *Offshore Petroleum and Greenhouse Gas Storage Act* 2006 whose title area overlaps with the licence area; and b. in the MP for the licence, address the outcomes of this consultation.	a(i). Consultation records confirm consultation took place with the Bureau of Meteorology. a(ii). Consultation records confirm consultation took place with Parks Victoria (Director). a(iii). Consultation records confirm consultation took place with the Australian Maritime Safety Authority a(iv). Consultation records confirm consultation took place with Esso Australia, Basslink/APA Group, Palisade – Tasmanian Gas Pipeline and Marinus Link. b. Consultation records outline the response and outcomes as a result of consultation with a(i), a(ii), a(iii), a(iv).
3. The licence holder must: a. in preparing a MP for the licence, consult: i. in the case of a concession or permit holder that has nominated a representative organisation for the purposes of the consultation—the representative organisation; and ii. in any other case—the concession or permit holder; and b. in the MP for the licence, address the outcomes of this consultation, including how impacts on these holders may be avoided, mitigated, or offset.	Section 2.2.1 identifies the approach undertaken to identify commercial fisheries concession or permit holders representative organisations for the purpose of consultation. Consultation records confirm consultation took place.

3.2 Relevant Obligations Under EPBC Act

In accordance with OEI Regulation 77(1)(f), this section summarises the EPBC Act obligations that are applicable to the proposed licence activity.

On 20th of August 2024, Blue Mackerel North submitted an EPBC Act Referral to DCCEEW for the proposed wind farm marine surveys (including the proposed licence activity) (2024/09934). On 11th November 2024, the Minister's delegate notified Blue Mackerel that the proposed action was 'not a controlled action if undertaken in a particular manner', with particular manner obligations specified by DCCEEW.

Definitions associated with the particular manner obligations specified by DCCEEW are listed in Table 3.3. The bolded words within Table 3.3 are assigned definitions elsewhere within this table. The relevant particular manner obligations are detailed in Table 3.4.

Table 3.3 *Definitions associated with the particular manner obligations specified by DCCEEW*

Term	Definition
Biologically Important Area (BIA)	Any spatially and temporally defined areas of the marine environment used by protected marine species for carrying out critical life functions. BIAs are designated by identifying areas and times known or likely to be regularly or repeatedly used by individuals or aggregations of a single species, stock, or population for either reproduction, feeding, migration or resting as indicated in the Australian Marine Spatial Information System.
Cetacean	A member of the Order Cetacea.
Day-time	The period of time which commences 30 minutes before sunrise and ends 30 minutes after sunset on any given day, where sunrise and sunset occur at the times specified on the Australian Government Bureau of Meteorology's official phone app or the Geoscience Australia website (available at the following link at the time of this approval decision: https://geodesyapps.ga.gov.au/sunrise) for Seaspray on the particular day.
Definitive Ranked Lists of Registered Products	The OCNS Ranked Lists of Notified Chemicals compiled by the Centre for Environment Fisheries and Aquaculture Science, United Kingdom as published on the date of this decision.
Dynamic positioning thruster	Engine that is used to hold a **survey vessel** steady (in a fixed position) and minimise drift.
Geophysical survey	A non-intrusive method of sampling the sub-bottom seafloor.
Geotechnical survey	An intrusive method of sampling the sub-bottom seafloor.
Good visibility	Conditions during **day-time** that enable the clear visual detection and identification of any **whale** present in the **Precaution Zone**.
Invasive marine species (IMS)	Organisms that do not naturally occur in a particular location.
Low-power zone	All waters between 0.5 kilometres and 2 kilometres of a **survey vessel**.
Lowest power setting	The lowest possible power that would not risk damaging **survey equipment** or endanger human safety.

Term	Definition
Low visibility	Conditions, including **night-time**, rainfall, fog, rough seas and high winds, that would prevent the clear visual detection and identification of any **whale** within the **Precaution Zone**.
Marine Mammal Observer (MMO)	A person trained and experienced in **cetacean** identification and behaviour, distance estimation, and capable of making accurate identifications and observations of **cetaceans** in Australian waters.
Night-time	All times which fall outside of **day-time**.
Observation Zone	All waters within 3 kilometres of a **survey vessel** but further than 2 kilometres from a **survey vessel**.
Precaution Zone	The **Observation Zone**, the **Low-Power Zone** and the **Shut-down Zone** combined**.**
Project area	The location of the Action, represented in Attachment A by the area shaded dark purple designated as 'Survey Sub-Area 1 (Disturbance Footprint)' and the area shaded light purple designated 'Survey Sub-Area 2 (Disturbance Footprint)'.
Reproduction BIA	The area represented in Attachment A by the light green shaded zone designated as 'Southern Right Whale BIA – Reproduction Area'.
Senior MMO	A person who has been trained and has at least 2 years of field experience, including a minimum of 120 days at-sea experience, in **cetacean** identification and behaviour, distance estimation, and is capable of making accurate identifications and observations of **cetaceans** in Australian waters.
Shut-down event	The powering down or shutting off of underwater noise producing equipment in accordance with this notice.
Shut-down Zone	All waters within 500 metres of a **survey vessel**.
Survey equipment	Equipment used to undertake any **Geotechnical Survey** or **Geophysical Survey**, including the **survey vessel**.
Survey vessel	Ship, boat, raft or pontoon or any other thing capable of carrying persons or goods through or on water and includes a floating structure and hovercraft being used as part of this Action.
Trained crew	Crew that have demonstrated sound understanding of the requirements of the EPBC decision notice, and have had experience in and demonstrated aptitude for whale observation, whale identification, distance estimation and reporting.

Blue Mackerel will ensure the licence activities are undertaken in the manner described in the EPBC Act Referral, including through applying the mitigation measures outlined in Table 8-1 of the EPBC Act Referral (additional to the particular manner obligations outlined in Table 3.4). Blue Mackerel will monitor the contractor's compliance with the conditions via inspections and having a client representative onboard the geotechnical vessel (see Section 6.6.4). Note that the obligations in grey text in Table 3.4 pertain to geophysical investigations only, which are not regulated by the OEI Act and therefore are not a regulated licence activity for the purposes of the MP.

Table 3.4 *DCCEEW particular manner obligations for the proposed Action*

DCCEEW particular manner obligations	Control measure to be implemented
Project area boundary	
1. The person taking the Action must not take the Action outside the project area.	Vessel tracks will be recorded with Global Positioning System (GPS). ○ Daily operations reports will be used to verify this.
Cetacean interaction minimisation	
2. The person taking the Action must ensure that no surveyed vessel travels at a speed greater than 6kts if a cetacean has been observed in the shut-down zone (500m) within any of the previous 30 minutes unless all sighted cetaceans have been observed to leave the shut-down zone.	Marine Fauna Observer (MFO) will be onboard the geotechnical vessel to implement the cetacean interaction procedure. ○ Daily sightings reports will be used to verify this.
3. The person taking the Action must ensure that no survey vessel travels at a speed greater than 10kts when undertaking geophysical surveys in BIAs	N/A
4. The person taking the Action must ensure that no geotechnical survey is undertaken within 3km of the reproduction BIA in any period between 1 May and 31 October of the same year.	The geotechnical investigation will not take place between 1 May and 31 October within 3km of reproduction area for cetaceans. ○ Daily operations reports will be used to verify this. *Note: the FLA is greater than 3km away from the SRW reproduction BIA*
Training, recording and precautionary measures	
5. The person taking the Action must ensure all crew onboard the survey vessels are trained crew.	All relevant crew will undertake environmental and megafauna inductions. ○ Induction attendance records will verify this. Senior MFOs and MFOs will have specialist training and experience. ○ Curricula vitae and/or training records will verify this.
6. If one or more whale is observed within the precaution zone (3km) during a geotechnical survey, the person taking the action must ensure that, as soon as possible or thereafter, a minimum of one Senior Marine Mammal Observer (MMO) and one MMO continuously monitor the precaution zone and monitor the movements of whales until all whales have left the precaution zone or at least 30 minutes have passed since the most recent observation of a whale.	MFO will be onboard the geotechnical vessel to implement the cetacean interaction procedure. ○ Daily sightings reports will be used to verify this.
Geophysical survey observations	
7. During good-visibility conditions, the person taking the Action must ensure at least on MMO and one trained crew member undertake continuous monitoring for the Precaution Zone for the entire duration that any Sub-bottom profiler (SBP) is operating. The person taking the Action must ensure the trained crew and MMO: a) Commence pre-start up surveying of the Precaution Zone for whales at least 30 minutes prior to operating any SBP. If a whale is observed within the low-power zone or shut-down zone during this time, the person taking the Action must ensure that no SBP begins operating unless: i. All whales have left the low-power zone and any sub-bottom profiler is operated in	N/A

DCCEEW particular manner obligations	Control measure to be implemented
accordance with the soft-start procedure; or ii. At least 30 minutes have passed since the most recent observation of a whale and SBP is operated in accordance with the soft-start procedure. b) Do not undertake any other duties whilst required to undertake surveying for whales c) Continuously monitor the movements of whales to detect whether any whale has entered or appears likely to enter the observation zone, the low-power zone or the shut-down zone	
Geophysical survey observations	
8. During low-visibility conditions, the person taking the Action must ensure at least one Senior MMO and one MMO monitor the Precaution Zone for the entire duration that any Sub-bottom profiler is operating. The person taking the Action must ensure the Senior MMO and MMO: a) Use technology to support the detection of any whale in the Precaution Zone. b) Commence pre-start up surveying of the Precaution Zone for whales at least 30 minutes prior to operating any Sub-bottom Profiler. If a whale is observed within the Low-power Zone or the Shut-down Zone during this time, the person taking the Action must ensure that no Sub-bottom Profiler begins operating unless: i. all whales have left the Low-power Zone and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure; or ii. at least 30 minutes have passed since the most recent observation of a whale and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure. c) Do not undertake any other duties whilst required to undertake surveying for whales. d) Continuously monitor the movements of whales to detect whether any whale has entered or appears likely to enter, the Observation Zone, the Low-power Zone or the Shut-down Zone.	N/A
Management of geophysical survey operations	
9. If, while operating any Sub-bottom Profiler, one or more whale has been observed in, or appears likely to enter the: a) Shut-down Zone, the person taking the Action must ensure that the operation of any Sub-bottom Profiler ceases. The person taking the Action must not begin the operation of any Sub-bottom Profiler unless: i. all whales have left the Low-power Zone and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure; or ii. at least 30 minutes have passed since the most recent observation of a whale and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure. b) Low-power Zone, the person taking the Action must ensure that any Sub-bottom Profiler is powered down to minimum power. After this, the	N/A

DCCEEW particular manner obligations	Control measure to be implemented
person taking the Action must not power up any Sub-bottom Profiler unless: i. all whales have left the Low-power Zone and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure; or ii. at least 30 minutes have passed since the most recent observation of a whale and any Sub-bottom Profiler is operated in accordance with the Soft-start Procedure.	
10. The person undertaking the Action must not undertake any **Geophysical Survey** during **low visibility** conditions if there have been three or more **Shut-down events** in the preceding 24 hours of undertaking **Geophysical Surveys**.	N/A
11. If the person taking the Action is required to cease undertaking any **Geophysical Survey** in accordance with Particular Manner 10, the person taking the Action must not resume undertaking any **Geophysical Survey** unless at least one **Senior MMO** and one **trained crew** observe and report a continuous period of **good visibility** conditions for at least two consecutive hours and confirm that no **whale** has been observed in the **Precaution Zone** during this two hour period.	N/A
Geotechnical survey observations	
12) During good-visibility conditions, the person taking the Action must ensure at least one MMO and one trained crew undertake continuous monitoring of the precaution zone (3km) while any dynamic positioning (DP) thruster is operating. The person taking the Action must ensure the trained crew and MMO: a) Commence surveying of the precaution zone for whales at least 30 minutes prior to commencing operating any DP thruster. If a whale is observed within the precaution zone during this time, the person undertaking the Action must not begin operating any DP thruster unless all whales have left the precaution zone, or at least 30 minutes have passed since the last observation of a whale. b) Do not undertake any other duties when required to undertake surveying for whales. c) Continuously monitor the movements of whales to detect whether any whale has entered or appears likely to enter the observation zone, the low-power zone or the shut-down zone.	MFO will be onboard the geotechnical vessel to implement the cetacean interaction procedure. o Daily sightings reports will be used to verify this.
Geotechnical survey observations during low visibility	
13) The person taking the Action must ensure at least one Senior MMO and one MMO continuously monitor the precaution zone while any DP thruster is operating during low-visibility conditions. The person taking the Action must ensure the Senior MMO and MMO: a) Use technology to support the detection of whales in the precaution zone. b) Commence surveying the precaution zone for whales at least 30 minutes prior to commencing operating any DP thruster. If a whale is observed within the precaution zone during this time, the person taking the Action must not operating any DP thruster unless all whales have left the precaution zone, or at least 30 minutes have passed since the last observation of a whale.	MFO will be onboard the geotechnical vessel to implement the cetacean interaction procedure. o Daily sightings reports will be used to verify this.

DCCEEW particular manner obligations	Control measure to be implemented
c) Do not undertake any other duties whilst required to monitor for whales. d) Continuously monitor the movements of whales to detect whether any have entered or appear likely to enter the observation zone, the low-power zone or the shut-down zone.	
Management of geotechnical survey operations	
14) If, while any DP thruster is operating, one or more whale has entered or appears likely to enter the precaution zone, the person taking the Action must ensure that any DP thruster is powered down to the lowest power setting until all whales have left the precaution zone, or until at least 30 minutes has elapsed since the most recent sighting of a whale.	MFO will be onboard the geotechnical vessel to implement the cetacean interaction procedure. o Daily sightings reports will be used to verify this.
Chemical management	
15) The person taking the Action must only use drilling activities listed on the Definitive Ranked List of Registered Products as Gold, Silver or Group D/E products.	All chemicals used in the geotechnical drilling muds are rated as Gold or Silver or Group D or E products. o A copy of the Definitive Ranked List of Registered Products downloaded prior to the activity will be used to verify that all chemicals meet the ranking requirements.
Invasive marine species (IMS)	
16) The person taking the Action must ensure that it does not, in taking of the Action, introduce or spread invasive marine species to areas of the Commonwealth marine environment where they were not previously present.	As described in Table 8-1 of the EPBC referral, a Biosecurity Management Plan will be prepared and implemented for the investigation activities to ensure compliance with all relevant Commonwealth and Victorian biosecurity policy. Vessel and deployed equipment assessment for IMS risk will be undertaken ahead of the licence activity. o IMS assessments and/or inspection reports will verify this.
Underwater cultural heritage	
17) The person taking the Action must not undertake geotechnical surveys within the *SS Glenelg* Protection Zone (500m).	Vessel tracks will be recorded with GPS. o Daily operations reports will be used to verify this.
18) The person taking the Action must have the data collected from all geophysical surveys analysed by an underwater archaeologist prior to undertaking any geotechnical survey. The person taking the Action must ensure that no geotechnical survey is undertaken within 100m of where the underwater archaeologist considers underwater cultural heritage to be present.	An underwater archaeologist will be contracted to review the geophysical survey data. o The archaeological heritage report will verify this has been completed prior to the geotechnical survey. o Buffer zones of 100m around any cultural heritage sites will be applied in the geotechnical outlines any underwater cultural heritage to be avoided (if applicable).

Note: MFO have similar roles as MMO, however MFOs record all megafauna sightings rather than only marine mammals.

In addition to the table above, DCCEEW provided a request regarding recording and reporting of cetacean sightings, via email on 14 November 2024. As outlined in Table 3.4, this additional request from DCCEEW will be implemented by the MFO on the geotechnical vessel.

4 Work Health, Safety and Diving Obligations

In accordance with the OEI Regulations 77(1)(k), this section summarises the work health, safety and diving obligations.

The scope of work for this plan includes deployment of the FLS and DWR as outlined in Section 1.3 and to undertake geotechnical investigations and sampling as outlined in Section 1.4.

Blue Mackerel as the licence holder will be a person conducting a business or undertaking (PCBU) and as such holds the primary duty of care under Section 19 of the WHS Act (as applied by the OEI Act) and will apply this duty in relation to all workers who are carrying out work in any capacity for Blue Mackerel, specifically the contractors who have been engaged to perform the work. This will include responsibility for personnel executing work in the licence area from a vessel. There are no construction activities associated with this scope of work and as such no principal contractor is engaged.

All contractors engaged to undertake activities will be prequalified as outlined in the contractor management procedure and this ensures that they have the appropriate management systems, qualifications, competencies required, as outlined in Section 6.9 of this MP summary.

The relevant management system processes that are in place to execute the licence activities are detailed in Section 6 of this MP summary.

The requirements for ongoing compliance monitoring are outlined in Section 6.5 of this MP summary.

The contractors are required to provide a project-specific HSE Plan that will be approved by Blue Mackerel. They will also provide a bridging Emergency Response Plan (ERP).

There is no diving required for this licence activity.

5 Infrastructure Integrity Assurance and Maintenance

5.1 Maintenance

5.1.1 Metocean Equipment

In accordance with OEI Regulation 77(1)(g), this section summarises the proposed maintenance associated with the metocean equipment.

5.1.1.1 Physical Inspections

Prior to deployment, physical and functional inspections of the equipment will be conducted, the inspections will include the physical condition of the FLS unit, the wave sensor and, seal and joint inspections.

A thorough inspection of the FLA unit's condition will occur before mobilisation to site identifying signs of wear, corrosion, or saltwater damage that could impact performance. The wave sensor will be inspected for any accumulation of debris, algae, or marine life that could affect the accuracy of the measurements with cleaning and maintenance occurring prior to deployment.

5.1.1.2 Monitoring During Deployment

To ensure the continued operation of the FLS and DWR, battery monitoring, firmware and calibration updates, manual data inspection and standard reviews will be undertaken remotely.

5.1.1.3 Annual Maintenance and Servicing

FLS equipment, mooring components and the anchor (as listed in Table 1.5) will be completely removed during the 12-month service and towed to shore for servicing and re-deployed with a new anchor and moorings after servicing. The DWR will undergo infield servicing, including system checks, cleaning, painting, and installation of a new anchor and mooring components (as listed in Table 1.5) at sea. The old mooring components and anchor will be completely removed after 12 months.

If a problem is detected through monitoring or an alarm system, immediate servicing will be initiated. This includes any issues identified by the automated or manual monitoring systems previously described.

5.1.1.4 Contingency Planning

In case of component failure or issues detected during monitoring, there is a robust contingency plan in place to mitigate downtime:

- Each buoy is equipped with redundant logging and transmission systems, reducing the likelihood of unscheduled maintenance.
- A stock of critical spare parts will be maintained, including LiDAR systems, mooring equipment, and subsurface components, to ensure quick response to any failures.
- Rapid intervention will be possible through RPS' local contractors with expertise in FLS operations. Personnel can be sent directly from RPS's Perth office for swift action in the event of an emergency.
- The RPS Data Monitor system will continuously monitor buoy data, key alarm triggers. These alarms are transmitted via email and SMS to key staff, who will then initiate emergency response procedures.
- Two independently powered satellite tracking beacons are installed on the FLS buoy to track its position and provide alerts in the case of issues such as drifting.

5.1.1.5 Planned Emergency Response

Upon receiving a drifting alert, the designated project manager (PM) will verify the location using GPS data and determine if the buoy is under tow or drifting. If the buoy is drifting, the PM will assess environment conditions and coordinate with local contractors to identify available vessels and intervene as needed. If equipment faults or failures occur, an initial fault report will be issued within 5 working days, detailing the issue, assumptions, and actions being taken to address it.

5.1.2 Geotechnical Equipment

In accordance with OEI Regulations 77(1)(g), this section summarises the proposed maintenance associated with the geotechnical equipment.

Because vessels operating in support of offshore infrastructure activities are not infrastructure (per Section 7.2 of the OIR's *Management Plan content guideline*), maintenance of the geotechnical vessel and its equipment is not subject to description in a MP. The geotechnical vessel and associated equipment will be maintained according to the planned maintenance schedules specified by the contractor.

5.2 Mooring & Anchor Maintenance

In accordance with OEI Regulations 77(1)(g), this section summarises the proposed maintenance associated with moorings and anchors.

Moorings

The moorings for both the FLS and the DWR are designed to be maintenance-free for the 12 months of use.

After the first 12 months, the FLS and DWR will undergo routine maintenance. The FLS along with the entirety of its moorings will be brought back to shore where it will be serviced, and the mooring will be completely replaced before being redeployed in the same location.

The DWR will be serviced in-situ where it will be taken out of the water along with its moorings. The mooring will then be completely replaced before being redeployed in the same location. The moorings have been designed to last for up to 24 months however for this activity, they will be replaced every 12 months.

The moorings for both the FLS and the DWR have been designed in accordance with the relevant industrial standards

Anchors

Anchors for the FLS and DWR will be removed after 12 months and redeployed along with the new mooring.

5.3 Decommissioning and Removal

5.3.1 Metocean Recovery

In accordance with OEI Regulation 77(1)(h)(i), this section summarises the proposed removal associated with the metocean equipment. All equipment brought into the FLA (see Table 1.5) will be fully decommissioned after its intended use and nothing will remain on the seabed and will take a maximum of 2 weeks to recover.

5.3.1.1 Recovery of FLS

Recovery of the FLS will be very similar to the deployment methodology but will occur in reverse (see Section 1.4.2.1), which occurs in two parts:

FLS buoy recovery

1. The vessel must be at least 200 m away from FLS and acoustic response spooler.
2. The acoustic transducer will be activated, where the acoustic response spooler will release the upper floating buoy.
3. The floating buoy will be pulled in towards the vessel and either:
    a. Tethered off the vessel, or
    b. Allowed to drift dependent on the weather conditions (if the weather conditions do not permit, the anchor will be recovered at a later date. Steps 4 and 5 will be skipped in this case).

Anchor recovery

4. The vessel will activate the acoustic spooler to release the lower floating buoy.
5. The lower buoy will be connected to the crane on the vessel, which will safely lift the buoy and anchor onto the vessel deck.
6. Once the anchor is bunded to the vessel deck, the FLS mooring line will be replaced with a towing line.
7. The FLS will be towed back to port.

Recovery of the anchor is a key part of the overall decommissioning. As the anchor must be recovered back to the deck, the resistance to retrieval of an anchor depends on its embedment into the sand. Recovery of the anchor is achieved by activating an acoustic release which will release a float to the surface which is connected via a rope on a spooler to the anchor chain for retrieval (as listed in the steps earlier).

5.3.1.2 Recovery of DWR

The DWR will be retrieved similarly to the FLS, however it will not be towed:

1. Acoustic transducer will activate the acoustic response spooler and release the floating buoy.
2. The DWR and floating buoy will be pulled onto the vessel deck by pulling in the mooring line.
3. The DWR will be detached from the mooring line.
4. The chains below the floating buoy will be attached to the crane.
5. The crane will lift the remaining mooring line and anchor from the seabed.

5.3.2 Decommissioning

In accordance with OEI Regulations 77(1)(h), this section summarises the proposed decommissioning/removal associated with the metocean and geotechnical investigations.

No decommissioning will be required for geotechnical investigations as the vessel and recovered equipment will transit back to port and out of the FLA once all required samples are collected. No equipment will be left on the seabed at the completion of the geotechnical investigations.

For the geotechnical investigations only two separate pieces of equipment will be placed on the seabed include (described in more detail in Section 1.4.1):

- A seabed frame; and
- A grab sampler.

Decommissioning of the metocean equipment is outlined in Section 5.3.1. Once the equipment is returned to port, the equipment will be disassembled and returned to the supplier.

5.4 Remediation

In accordance with OEI Regulations 77(1)(i), this section summarises the remediation associated with the geotechnical and metocean investigations.

Remediation activities are not required for the proposed licence activities because equipment will not be retained in situ. Seabed disturbance created by geotechnical sampling and tethering of metocean equipment to the seabed will rapidly remediate itself, though boreholes and anchor depressions collapsing in on themselves and rapidly becoming congruent with the surrounding seabed.

6 Management Systems

In accordance with OEI Regulations 77(1)(d), this section summarises the Blue Mackerel HSSE Management System.

6.1 Management System

The purpose of the Blue Mackerel HSSE Management System is to describe the processes in place to effectively manage the specific hazards and risks associated with the Project and in compliance with the WHS Act obligations. It also outlines the key roles and responsibilities for the project personnel in implementing this system. The HSSE Management System outlines the processes that will apply to the licence activities to which the MP applies as well as outlines the processes by which the project will maintain compliance with the key Commonwealth legislation including:

- *Offshore Electricity Infrastructure Act 2021*;
- Offshore Electricity Infrastructure Regulations 2022;
- *Environment Protection and Biodiversity Conservation Act 1999*; and
- *Workplace Health and Safety Act 2011*

6.2 Blue Mackerel's Health, Safety, Security and Environmental Policy

All operations, activities and tasks performed or managed by Parkwind (as the owner of Blue Mackerel, see Section 6.3) will be undertaken in accordance with the Parkwind HSSE Policy. The policy outlines Blue Mackerel's commitment to WHS obligations and compliance with all required legal and other requirements.

6.3 Activity Organisational Structure

Blue Mackerel is owned by Parkwind and other shareholders. Figure 6.2 presents the organisation chart for the Blue Mackerel Project.

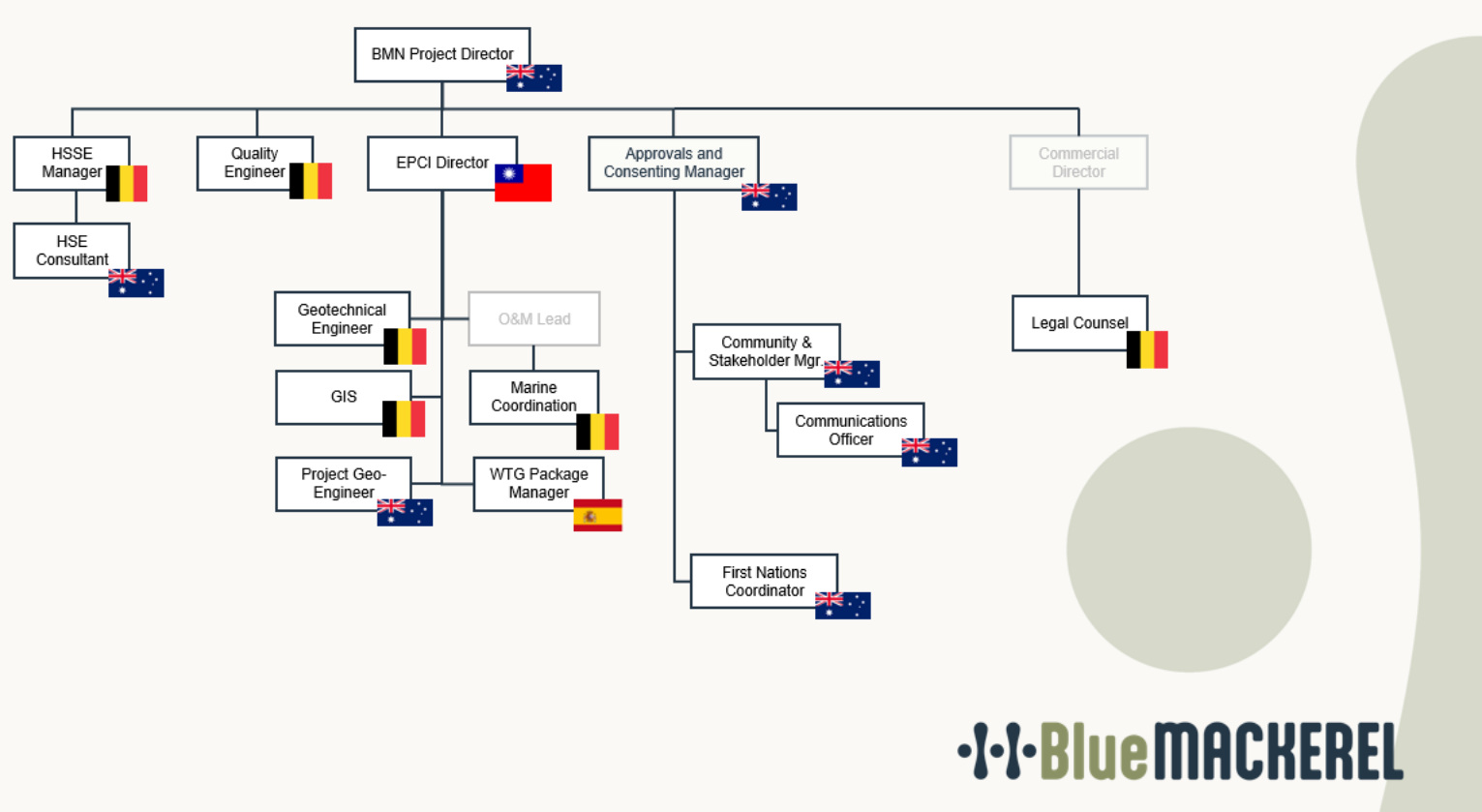

Figure 6.1 *Australian Projects Organisation Chart*

6.4 Roles and Responsibilities

Blue Mackerel regards HSSE management as a line responsibility and an integral part of the duties of all personnel.

All positions on the project have HSSE roles and responsibilities that are provided in position descriptions and regularly communicated through project meetings and inductions. The Blue Mackerel project has in place an Approvals and Consenting Manager and environment lead who are responsible for overseeing compliance to the MP.

6.5 Legal and Other Requirements

Blue Mackerel will comply with all applicable legal and other requirements. Other requirements may refer to permit requirements, licence conditions, internationally well-known industry standards or codes, requirements from shareholder or insurer and commitments made to local communities or landowners (contractual or otherwise). These requirements are listed in the Legal and Other requirements Compliance Register. The HSSE Manager regularly monitors, reviews and updates this register to keep the information current and to ensure compliance. Day-to-day compliance is undertaken via the ongoing implementation of this management system and MP.

6.6 Risk Assessment Process

6.6.1 Hazard Identification & Risk Assessment Process

Blue Mackerel uses a three-step hazard identification and risk assessment approach including company and project risk workshops with project teams and outcomes recorded in the project risk register.

A risk session was held to identify hazards from the Project risk register and how they should be mitigated and contractor Hazard Identification (HAZID) sessions ensuring all mitigation measures are transferred in the contractors HAZID for the scope of works.

The hazard identification and risk assessment process is risk-based and thereby complies with ISO and industry standards with regard to risk management. The outcomes of the risk evaluation are maintained on file and are regularly monitored and reviewed as outlined in Section 6.6.3.

6.6.2 Risk Treatment

Blue Mackerel's risk treatment process follows the hierarchy of controls philosophy, with the steps in the hierarchy of control philosophy (in order of effectiveness) being:

1. Eliminate the hazard – remove hazardous substances, adopt different methods of work, etc.
2. Substitute the hazard – substitute the hazard for something that is less harmful.
3. Isolate – isolate the hazard at source, place physical barriers between personnel and hazard, etc.
4. Engineering controls – engineer out the hazard.
5. Administrative controls – organisation of work to prevent/reduce exposure, use of procedures, safe systems of work, permits to work, training, etc.
6. PPE – provide Personal Protective Equipment to personnel for use.

6.6.3 Monitoring and Review

Monitoring and review enables ongoing assessment of the effectiveness of the control measures to ensure these remain appropriate for activities being undertaken.

6.6.4 Compliance

Blue Mackerel recognises that the licence activities will be performed by a contractor; to ensure contractor compliance, Blue Mackerel will request and review (and where relevant, update) the relevant contractor documents. During the execution of extended licence activities, a Blue Mackerel client representative will be on board the vessel.

6.7 Training and Awareness

All personnel working on the Project must understand and comply with the requirements of the HSSE Management System. Contractors working on behalf of the Project will be adequately qualified to fulfill their roles and responsibilities and undergo an induction process to the project prior to departure to site.

Contractors and suppliers are expected to ensure their personnel are competent to perform their roles and responsibilities with due regard for HSSE and in accordance with this HSSE Management System, and their own HSSE management system requirements. Contractor HSSE management systems are reviewed as part of contractor evaluation and selection.

All personnel and other visitors are informed about any HSSE related risk to which they may be exposed prior to each licence activity. Site-specific rules and emergency response measures will be included in relevant HSSE inductions.

Where required, a training matrix is prepared that outlines the requirements of any licence activity-specific training requirements.

6.8 Consult, Communicate and Cooperate with all Levels of the Workforce

Regular workplace meetings ensure active engagement in consultation with regards to HSSE matters through HSSE meetings, workshops, inductions, inspections and audits.

Blue Mackerel will coordinate activities with others where applicable. It is not envisioned at this stage that there will be any simultaneous operations with other marine users (e.g., oil and gas exploration and production companies), however through ongoing consultation with other marine users, Blue Mackerel will confirm closer to the time of the work that there are no other activities being undertaken.

Blue Mackerel has in place a consultation plan, which includes regular updates through various methods with all other marine users who are known to or may use the waters of the Blue Mackerel FLA.

6.9 Contractor Management

Blue Mackerel ensures that the HSSE management systems and performance of contractors conforms to the aspirations and commitments set out in the HSSE Policy and the HSSE Management System by undertaking evaluations of prospective contractors at the bidding/procurement.

The contract documents include HSSE clauses that define contractor HSSE management requirements and Blue Mackerel ensures that its contractors will be managed in accordance with the HSSE Policy and HSSE Management System.

6.10 Incident Management

All project personnel, including contractors, are required to report incidents as soon as practicable to ensure appropriate learnings and investigations can be undertaken to prevent a re-occurrence. Blue Mackerel will

adopt the required incident management procedures in accordance with the HSSE Policy and HSSE Management System.

Blue Mackerel will notify the OIR in accordance with OEI Regulation 161 where the notification will be given to the OIR as soon as practicable after becoming aware that the event has occurred, and a written report will be prepared and submitted within 48 hours of the initial notification.

6.11 Activity Notifications

In accordance with the OEI Regulation 80(2)(b)(c), Blue Mackerel will ensure that the OIR is notified 30 days prior to a licence activity commencing, and within 30 days of the licence activity completion.

6.12 Management of Change

Before the licence activities commence, a final document package will be validated. If for any reason a change is needed to the way of working described in the final documents, the management of change (MoC) process is to be followed in line with OEI Regulation 60.

6.13 HSSE Records

Records are not controlled documents but are generated as evidence of compliance with the HSSE Management System. These records will be stored securely electronically and regularly reviewed by the HSSE Manager for compliance monitoring purposes and made available for inspection if required as outlined in regulation 142.

6.14 Assurance, Reporting and Review

Key performance indicators and targets (leading and lagging) are included in all contracts and are monitored to ensure ongoing contractor HSSE performance which can include the number and natures of incidents, completed actions and investigations, inspections and audits.

6.15 Monitoring, Auditing and Management of Non-conformance

Inspections and audits are scheduled based on the activities of the Project and can include audits and/or inspections in relation to the HSSE Management System, offices, contractors and inspections of work sites to identify and resolve hazards and risks ensuring compliance where non-conformities will result in actions to secure compliance. This is managed by the HSSE Manager, with support from the Project Director and/or another delegated person in the Project team ensuring legal requirements are met before works commence. A Blue Mackerel client representative will be on board the geotechnical vessel to monitor on-going compliance with HSSE requirements, among other duties.

Parkwind issues a monthly HSSE report based on the information captured in the Safety Offshore System online reporting tool. Any non-conformances that are identified will be reported through the incident reporting system and tracked and monitored to ensure effective corrective action is taken.

Management review is the process through which senior management at Blue Mackerel review the HSSE performance and the adequacy and effectiveness of the HSSE Management System. The management reviews include the activities undertaken over the previous month and all planned HSSE action plans. Corrective or preventive actions are prioritised according to the risk level or associated impact. Management reviews are undertaken to evaluate the ongoing suitability of the HSSE Management System to the activities being undertaken for the Project.

7 Emergency Response Planning

7.1 Identify, Analyse and Mitigate the Risk of Emergencies

In accordance with OEI Regulation 77(1)(j), the possible emergency scenarios associated with the proposed licence activities include:

- Dropped objects;
- Vessel interactions;
- Shallow gas;
- Unexploded ordnance;
- Drifting buoy;
- Loss of positioning identification; and
- Medical emergency.

Blue Mackerel will ensure that there is an ERP prepared and maintained for the licence activities, which is ready to be implemented as required.

7.2 Crisis and Emergency Preparedness

Contractors working for Blue Mackerel in the FLA will be required to have an ERP in place (for vessels, this will include a Shipboard Oil Pollution Emergency Plan). The ERP identifies the key points for response to a major event affecting health and safety of the personnel, environmental impact and social stakeholders (local community). The ERP is part of the document package that Blue Mackerel will review during the licence activities preparation.

An ERP defines potential emergency scenarios and the actions to be taken to ensure that any injury or medical illness, vessel emergency or environmental pollution incurred is dealt with in an expedient manner.

7.3 ERP Monitoring, Maintaining and Testing

It is important to recognise the Blue Mackerel ERP and Vessel/contractor ERP for emergency response on the vessel will be active during the licence activities. Furthermore, two emergency response desktop/communication exercises will be held before the commencement of the works. A new ERP desktop communication exercise will be organised when a significant change is made to the communication structure between the contractor and Blue Mackerel.

8 References

Datawell BV. 2024. *Datawell Waverider Reference Manual.* Doc number: Datawell_DoC_DWR_MkIII_1_2https://datawell.nl/support/manuals/datawell_manual_dwr-mk3_dwr-g_wr-sg/

RPS. 2024. *Park Wind Offshore Wind Farm Measurements – Gippsland. Project Execution Plan*. Doc no. P356223. Tetra Tech Company.