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Volume 5

**Chapter 2**

Environmental Management Framework

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# 2 Environmental Management Framework

## 2.1 Introduction

This chapter presents the Environmental Management Framework that has been developed for the project. It applies to project components being assessed under Victorian and Commonwealth environmental legislation located in Victoria, Tasmania and the Commonwealth marine areas.

The Environmental Management Framework provides a transparent governance framework for the management of environmental impacts from the project to meet Victorian and Commonwealth environmental statutory requirements, achieve necessary environmental outcomes, protect environmental values and sustain stakeholder confidence.

This chapter addresses Section 6 Proposed avoidance and mitigation measures of the EIS guidelines. Refer to Attachment 1: Guidelines for the Content of a Draft Environmental Impact Statement for the EIS guidelines. The chapter also addresses Section 3.7 *Environmental management framework* in the EES scoping requirements. Refer to Attachment 2: Scoping Requirements Marinius Link Environment Effects Statement for the EES scoping requirements.

The Environmental Management Framework has been informed by the technical studies completed for the EIS/EES and the approach to environmental compliance being adopted by MLPL for the project. It includes Environmental Performance Requirements (EPRs) developed through the preparation of technical studies which specify the environmental outcomes that must be achieved during project delivery which includes design, construction, operation, and decommissioning of the project. The technical studies have assessed a concept design and survey area, which has also informed the development of the project's technical specifications for the procurement processes.

The Environmental Management Framework forms a part of the governance framework for delivery of the project and sets out the requirements and accountability of MLPL and its principal contractors for environmental compliance throughout the project. MLPL will monitor compliance with the Environmental Management Framework and EPRs through the implementation of an Environmental Management System developed in accordance with *AS/NZS ISO 14001:2016 Environmental management systems* (or equivalent standard). Principal contractors will also have an Environmental Management System certified under *AS/NZS ISO 14001:2016* or equivalent.

Compliance with the Environmental Management Framework and EPRs will be enforced through the contractual requirements for the construction and operation of the project, and during construction it will be verified, audited and reported on by an Independent Environmental Auditor (IEA).

Following grant of approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the Environmental Management Framework and relevant EPRs will be reviewed for consistency and updated if required to respond to the conditions of the EPBC Act approval.

Subject to the assessment of the EIS/EES and approval of the Planning Scheme Amendment (PSA), the Marinus Link Project Incorporated Document (Incorporated Document) under the Latrobe and South Gippsland Planning Schemes is likely to require the preparation of an Environmental Management Framework with EPRs and approval by the Victorian Minister for Planning.

Following approval of the PSA, this Environmental Management Framework and EPRs will be updated to address matters and recommendations from the Victorian Minister for Planning's assessment of the EIS/EES. Approval of the updated Environmental Management Framework will then be sought. If approved, the Environmental Management Framework will be enforceable by the Minister for Planning under the *Planning and Environment Act 1987* (Vic) (P&E Act) in respect of activities in Victoria.

## 2.2 Purpose of the Environmental Management Framework

The project includes the construction, operation and decommissioning activities across the jurisdictions of Victoria, Tasmania and the Commonwealth. This Environmental Management Framework applies to project components being assessed under Victorian and Commonwealth legislation.

The Environmental Management Framework outlines the responsibilities of:

- The regulators in consideration and assessment of the EIS/EES under Victorian and Commonwealth legislation;
- MLPL in securing the primary project approvals and developing the Environmental Management Framework and EPRs; and
- The principal contractors during construction and operation in accordance with Environmental Management Framework, EPRs, construction environmental management plan/s (CEMP) and operational environmental management plan/s (OEMP).

An overview of the Marinus Link Environmental Management Framework for the Victorian and Commonwealth jurisdictions, which applies to project components located on land and in the marine environment, is provided in Figure 5-1 .

There will be multiple principal contractors and sub-contractors involved in the delivery of the different project components. Each contractor must comply with the Environmental Management Framework, EPRs and project approvals as relevant to their scope and location of project works.

Plans required to comply with project approvals, may be prepared in stages by each principal contractor. However, these plans must be in place prior to the commencement of project works of that stage.

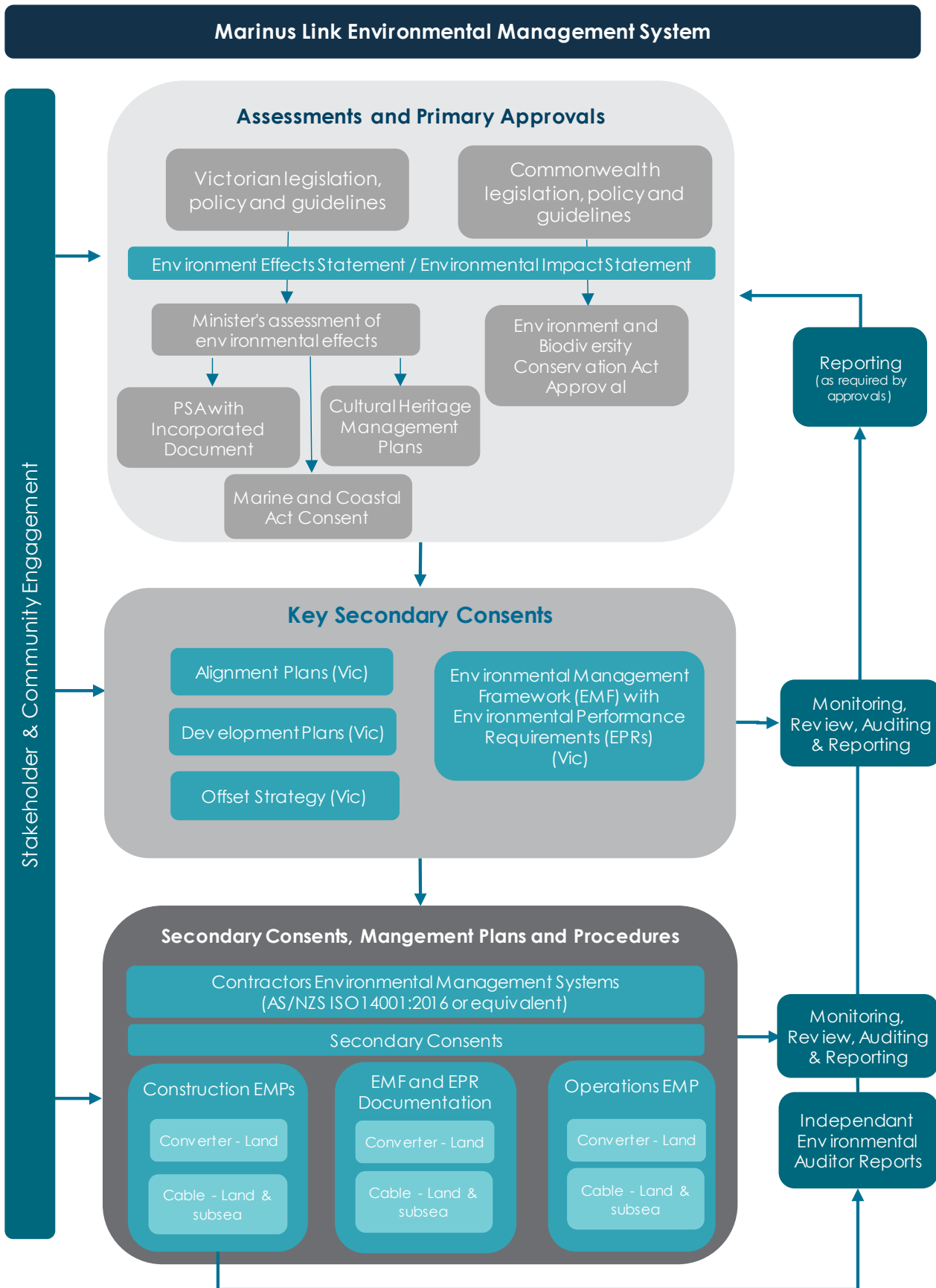


Figure 5-1 Marinus Link Environmental Management Framework

## 2.2.1 Project staging

It is proposed that the project be delivered in stages and by a number of principal contractors. Each principal contractor and MLPL are responsible for complying with relevant requirements of project approvals that apply to the project. MLPL will develop a Compliance Management Standard to outline the responsibilities applicable to each construction stage to comply with requirements of the Environmental Management Framework and EPRs.

The Compliance Management Standard will:

- Set out the MLPL delivery strategy for the project including how it will be staged, details of work and other activities to be carried out for construction and operation, and the general timing of each stage.
- Require the principal contractor to develop and implement a Sustainability Management Plan in accordance with the Marinius Link Sustainability Framework.
- Specify approval conditions that apply to each stage.

The selected principal contractors will develop works packages for components or sections of the project in accordance with the project's statutory approvals, project contracts and the MLPL Compliance Management Standard. Principal contractors will be those directly engaged by MLPL for works packages, and who may engage sub-contractors as required.

The Compliance Management Standard will be a controlled document and revised accordingly responding to the project delivery strategy and staging during construction.

MLPL will be responsible for confirming compliance of principal contractors and operational contractors with project approvals prior to and during construction, operation and decommissioning. MLPL will be supported by an IEA to confirm compliance with the CEMP prior to and during construction. Further details of these responsibilities are provided in Section 2.4.

## 2.2.2 Works covered by this Environmental Management Framework

The Environmental Management Framework covers the construction, operation and decommissioning the project that is being assessed under Victorian and Commonwealth legislation and which has been documented in this EIS/EES.

This includes project components located both onshore and offshore in Victoria and in the Commonwealth marine area in Bass Strait. This Environmental Management Framework also covers the values in Tasmania, both onshore and offshore, that are protected by the EPBC Act, as required by the EIS guidelines. The key project components covered by this Environmental Management Framework are summarised in Table 2-1.

The construction stages as described in this Environmental Management Framework and EPRs include construction, operation and decommissioning.

Further description of the project and its components are provided in Volume 1, Chapter 6 – Project description.

Table 2-1 Key project components covered by this Environmental Management Framework

Stage	Victoria	Commonwealth marine area	Tasmania
Construction	<ul style="list-style-type: none"> <li>✓ Shore crossing</li> <li>✓ Cable laying out to 3NM</li> <li>✓ Transition station</li> <li>✓ Communications building</li> <li>✓ Two 750 MW cables and joint pits</li> <li>✓ Converter station</li> <li>✓ Construction laydown areas, haul roads and access tracks.</li> </ul>	<ul style="list-style-type: none"> <li>✓ Seabed preparations</li> <li>✓ Subsea cable laying</li> </ul>	<ul style="list-style-type: none"> <li>✓ Converter station</li> <li>✓ Shore crossing construction</li> <li>✓ Cable laying out to 3NM</li> </ul>
Operation	<ul style="list-style-type: none"> <li>✓ Converter station, transition station and access track (if required) operation and maintenance</li> <li>✓ Cable maintenance</li> </ul>	<ul style="list-style-type: none"> <li>✓ Cable maintenance</li> </ul>	<ul style="list-style-type: none"> <li>✓ Converter station maintenance and operation</li> <li>✓ Cable maintenance</li> </ul>
Decommissioning (activities to be confirmed at end of asset life, including whether below ground infrastructure will be removed)	<ul style="list-style-type: none"> <li>✓ Removing cables</li> <li>✓ Demobilising above ground infrastructure</li> <li>✓ Removing access tracks and joint pits</li> <li>✓ Reinstatement of land</li> </ul>	<ul style="list-style-type: none"> <li>✓ Removing cables</li> </ul>	<ul style="list-style-type: none"> <li>✓ Removing cables</li> <li>✓ Demobilising above ground infrastructure</li> <li>✓ Reinstatement of land</li> </ul>

### 2.2.3 Regulatory requirements not addressed by the Environmental Management Framework

This Environmental Management Framework addresses the project within Tasmania relevant to assessment under the EPBC Act 1999 but does not address the requirements of the *Environmental Management and Pollution Control Act 1994* (EMPCA) and the *Land Use and Planning Approvals Act 1993* (LUPA).

Similarly, project works within the Commonwealth marine area are addressed in this Environmental Management Framework as required under the EPBC Act 1999, however the licence and management plans required under the *Offshore Electricity Infrastructure Act 2021* (Cwlth) (OEI Act) will be addressed separately.

## 2.3 Statutory context and approvals

The P&E Act and EPBC Act will provide the primary statutory basis for project approval and requirements for an Environmental Management Framework for the project. This section provides an overview of the primary approvals and key secondary consents expected to be required for the project. The primary approvals and key secondary consents are referred to as the project approvals in this document.

For the purposes of this Environmental Management Framework, secondary consents are the approvals obtained after the primary approvals. Secondary consents must be in place prior to commencement of relevant project works.

### 2.3.1 Primary approvals

MLPL is responsible for preparing the EIS/EES and obtaining the primary approvals for the project including:

- Approval of the action under the EPBC Act
- Transmission and infrastructure licence under the OEI Act
- Approval of the planning scheme amendment under the P&E Act
- Consent under the *Marine and Coastal Act 2018* (Vic) (MACA)
- Two approved CHMPs under the *Aboriginal Heritage Act 2006* (Vic)

The Minister for Planning's Assessment of the EES (under the *Environment Effects Act 1978* (Vic) (EE Act)) will inform the decision makers who issue approval for the project under the P&E Act and MACA.

Assessments prepared for the EES have also informed development of the CHMPs to be approved under the *Aboriginal Heritage Act 2006* (Vic). Table 2-2 provides further information on the primary approvals and Figure 5-2 shows the area covered by each approval.

Table 2-2 Primary approvals

Legislation	Primary approvals or assessments required	Decision maker
<b>Commonwealth</b>		
EPBC Act	<p>The project is a controlled action requiring assessment and approval under the EPBC Act.</p> <p>Assessment considers potential impacts to relevant Matters of National Environmental Significance (MNES) in Victoria and Tasmania both onshore and up to 3 NM offshore, and the Commonwealth marine area.</p>	Minister for the Environment and Water
OEI Act	<p>The Act applies to Commonwealth waters between Tasmanian and Victorian coastal waters.</p> <p>A transmission and infrastructure licence for the subsea cable must be granted by the Minister for Energy under the <i>Offshore Electricity Infrastructure Act 2021</i> prior to construction and operation of offshore electricity transmission infrastructure.</p> <p>The management plan under the licence approved by the Offshore Infrastructure Regulator must cover activities involving the construction, installation, commissioning, operation, maintenance or decommissioning of offshore renewable energy infrastructure or offshore electricity transmission infrastructure can commence.</p> <p><b>The transmission and infrastructure licence and management plan are not considered by this EMF.</b></p>	<p>Transmission and Infrastructure licence: Minister for Energy</p> <p>Management plan – Offshore Infrastructure Regulator</p>
<b>Victoria</b>		
EE Act	<p>The Minister for Planning determined that the project in Victoria requires assessment with an EES.</p> <p>The Minister for Planning will make an assessment about the project within the Victorian jurisdiction and whether it should proceed based on the EES and public inquiry process. This is not a statutory approval, rather it enables statutory decision makers to decide on approvals for a project under Victorian legislation.</p>	Minister for Planning
P&E Act	<p>The construction, operation and decommissioning of the Victorian components of the project will occur in the municipalities of Latrobe City Council and South Gippsland Shire Council.</p> <p>A PSA with Incorporated Document to be applied under a Specific Controls Overlay is proposed to apply a consistent planning control for the project in both council planning schemes.</p> <p>The Incorporated Document will apply to the area covered by the SCO and is proposed to be included in the relevant planning schemes. The incorporated document will require compliance with this EMF and EPRs.</p>	Minister for Planning
MACA	<p>As components of the project will be located offshore within Victorian waters and use sections of Crown Land onshore within 200 metres of the high-water mark during construction, consent is required under the MACA for any development and use on marine and coastal Crown land.</p> <p>The decision under MACA is informed by the Minister for Planning's Assessment of the EES .</p>	Minister for Environment
<i>Aboriginal Heritage Act 2006</i> (Vic)	<p>The project requires two CHMPs. One CHMP requires approval of the Gunaikurnai Land and Waters Aboriginal Corporation as the Registered Aboriginal Party of the part of the project area it covers. The other CHMP requires approval from First Peoples-State Relations as there is no appointed Registered Aboriginal Party under the <i>Aboriginal Heritage Act 2006</i> (Vic) for the project area it covers.</p>	<p>Gunaikurnai Land and Waters Aboriginal Corporation and First Peoples-State Relations</p>



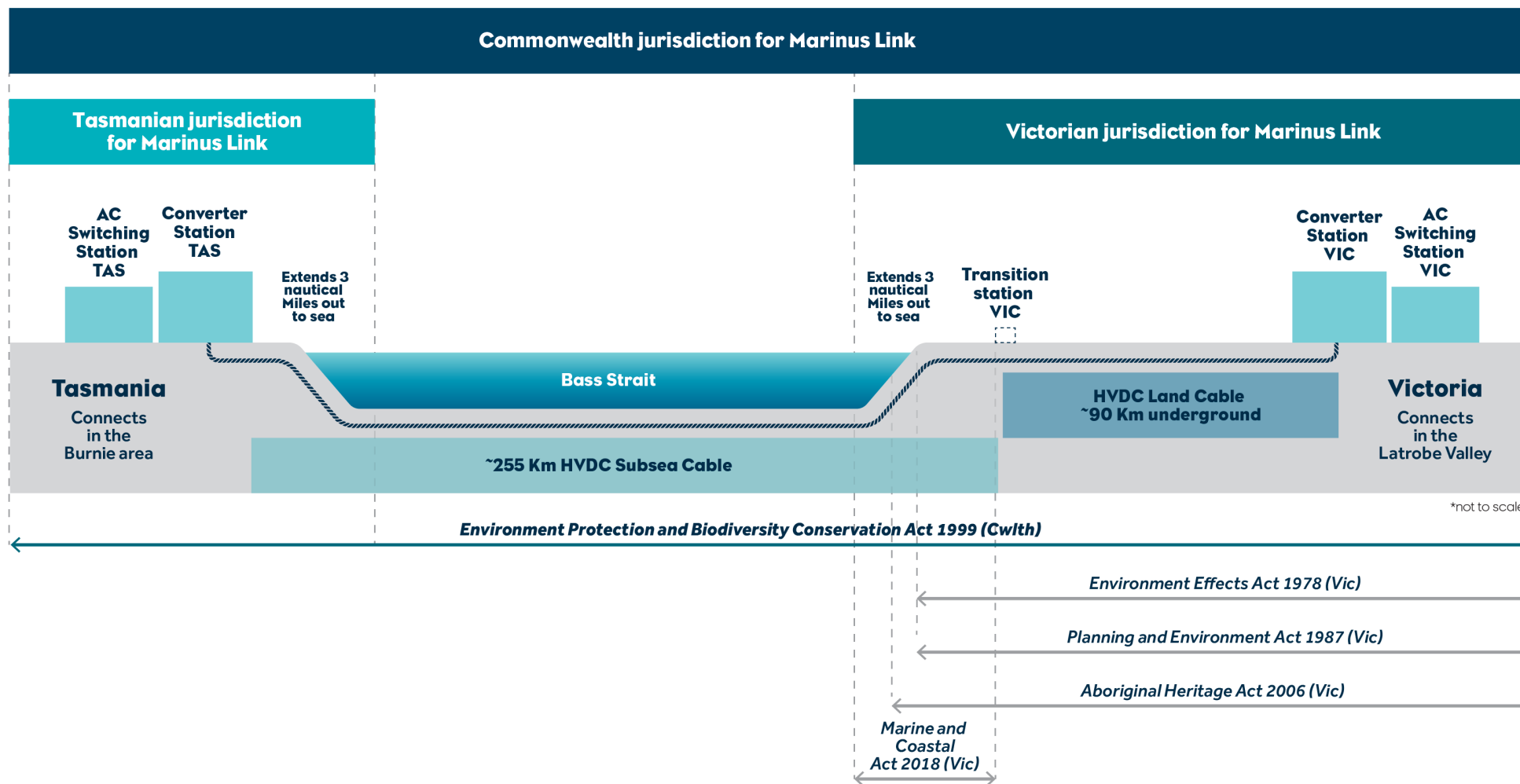


Figure 5-2 Key legislation for primary approvals within each jurisdiction

## 2.3.2 Secondary consents

Key secondary consents expected to be required by the PSA and Incorporated Document include an Environmental Management Framework with EPRs, Alignment Plans and Development Plans.

MLPL will be responsible for seeking approval for the Environmental Management Framework with EPRs following receipt of the Minister for Planning's assessment of the EES and addressing the Minister's recommendations. Principal contractors will be responsible for developing Alignment Plans and Development Plans to be approved by the Minister for Planning. Roles and responsibilities for key secondary consents are described in Section 2.4.

Other secondary consents will be obtained by principal contractors and their sub-contractors as required prior to commencing project works and are anticipated to include approvals under, but not limited to, the following legislation:

- *Water Act 1989* (Vic) – permit or licences for waterways crossing waterways and potentially to extract groundwater.
- *Heritage Act 2017* (Vic) – consent to disturb registered heritage sites.
- *Flora and Fauna Guarantee Act 2017* (Vic) (FFG Act) – Permit for the removal of listed flora from public land or from freehold land where that land is managed by a public authority.
- *Wildlife Act 1975* (Vic) – permit to relocate and handle wildlife.
- *Road Management Act 2004* (Vic) – consent to undertake road upgrades.
- *Building Act 1993* (Vic) – building permit for converter station buildings.

## 2.3.3 Planning Scheme Amendment

The proposed planning approval pathway for the project is by a PSA. A draft PSA has been prepared and exhibited with this EIS/EES (refer Attachment 3). If approved, the PSA will apply a Specific Controls Overlay (SCO) to the project alignment and controls for the project that are defined in an Incorporated Document. This approach enables a project specific planning approval to apply consistently across the whole alignment in both the South Gippsland Shire and Latrobe City council areas to facilitate use and development for the purposes of the project.

The SCO and Incorporated Document will enable the development and use of the Subject Land for the project. The SCO will apply to the Subject Land and include two areas:

- **Project Land:** The project alignment and infrastructure assessed in the EIS/EES consisting of the 220 m wide survey area, laydown areas, access tracks, converter station and transition station.
- **Additional Land:** An additional area outside the survey area but within part of each landholding affected by Project Land and may be required to accommodate alignment changes.

The draft Incorporated Document requires that the location of the final project alignment within the Victorian jurisdiction to be shown in project Alignment Plans, and the design of the converter station and potential

transition station shown in Development Plans. During operation, the project alignment will be located within in a 20 m wide easement.

The draft Incorporated Document includes the requirement for the Minister for Planning to approve this Environmental Management Framework and EPRs that relate to the works within the SCO, Alignment Plans for the project within the SCO and Development Plans for all above ground components of the project.

The draft Incorporated Document also outlines the requirements for complying with the relevant requirements of the *Guidelines for removal, destruction or lopping of native vegetation* (Department of Environment, Land, Water and Planning (DELWP) December 2017).

The draft PSA proposes that the Minister for Planning will be the responsible authority for administration and enforcement of the planning scheme in respect of the project.

## 2.4 Roles and responsibilities

This section describes the roles, responsibilities, and accountabilities for MLPL, regulators and principal contractors under this Environmental Management Framework for project delivery.

This section also outlines the responsibilities under the *Environment Protection Act 2017* (Vic) (EP Act) for MLPL and all contractors. The General Environmental Duty (GED) under the EP Act requires all persons undertaking activities give rise to a risk of harm to the environment or human health from pollution or waste to take measures to eliminate or, if not possible to eliminate, reduce the risk so far as reasonably practicable. The EP Act specifies duties that must be complied with to prevent and minimise harm to human health and the environment.

The roles and responsibilities outlined in Table 2-3 and Table 2-4 assumes the project has received the primary approvals. The key responsibilities include:

- Regulators – review and enforce compliance with project approvals.
- MLPL – obtain and comply with primary approvals and the EP Act, engage an IEA, monitor the principal contractors' compliance with primary approvals and key secondary consents.
- IEA - review CEMP and sub plans to confirm that they are consistent with requirements of the EMF, EPRs and project approvals and if so, verify via a written statement to this effect prior to implementation. The IEA must verify the CEMP and sub plans prior to commencement of construction by each principal contractor. The IEA will also audit principal contractors and MLPL, and report on environmental performance and compliance with approvals, the EMF, EPRs, project approvals and CEMP and sub plans during construction of the project. Due to the nature of the project, the IEA does not have a role in respect of the operations contractor.
- Principal contractors – design, construct and operate the project in accordance with primary approvals, approved management plans and applicable legislation. Mandate the compliance of sub-contractors with project approvals and secondary consents, where appropriate. Obtain and comply with secondary approvals and consents as required for their works.

Table 2-3 Government regulator roles and responsibilities

Regulator	Role	Responsibilities for the Environmental Management Framework
Minister for the Environment and Water (Cwlth)	Regulation	<p>Decision about whether the project should be approved under the EPBC Act, and if approved, determine the conditions of approval.</p> <p>Approve the EMF and EPRs relevant to MNES.</p> <p>Where necessary, approve relevant plans and documents in accordance with the EPBC Act approval conditions.</p>
Department of Climate Change, Energy, the Environment and Water (DCCEEW) (Cwlth)	Regulation	<p>Review, comment, and engage with MLPL through the development and, where necessary, approve relevant plans and documents in accordance with EPBC Act approval conditions.</p>
Minister for Planning (Vic)	Regulation	<p>Review and approve the EMF as it applies to project components within Victorian jurisdiction (which must include EPRs) and that are within the SCO, Alignment Plans and Development Plan/s in accordance with the Incorporated Document.</p> <p>Receive annual summary reports of audit outcomes and compliance with the EMF during construction, or as otherwise agreed with the Minister for Planning.</p> <p>Administer and enforce the Incorporated Document.</p>
Minister for Environment (Vic)	Regulation	<p>Determine if a consent should be issued for the project activities under the MACA (from 3 NM and coastal crown land up to 200 m inland of the highwater mark). If consent is given, determine approval conditions having regard to the EMF and EPRs approved by the Victorian Minister for Planning and Commonwealth Minister for Environment and Water.</p> <p>Review annual summary reports of audits outcomes and compliance with the EMF during construction as relevant to the area covered by the MACA consent, or as otherwise agreed with the Minister for Environment.</p>
Department of Transport and Planning (DTP) / Department of Energy, Environment and Climate Action (DEECA)/ Environment Protection Authority (EPA) (Vic)	Regulation	<p>Review, comment, and engage with MLPL and its principal contractors through development of relevant plans and documents as required by the EMF with EPRs and Incorporated Document.</p>

Table 2-4 MLPL and IEA roles and responsibilities

Proponent or IEA	Role	Responsibilities for the Environmental Management Framework (EMF)
MLPL	Project proponent	<p>Obtain and comply with primary approvals and key secondary consents as described in Section 2.3.1.</p> <p>Revise and update the EMF and EPRs in response to the relevant matters and recommendations made by the Minister for Planning in relation to the EIS/EES.</p> <p>Through project contracts, mandate compliance of all principal contractors and their sub-contractors with the EMF and EPRs, and the Incorporated Document.</p> <p>Develop and implement the Marinus Link EMS in alignment with AS/NZS ISO 14001:2016 (or equivalent standard).</p> <p>Prepare and implement all relevant plans as required by the EMF and EPRs.</p> <p>Prepare and implement a community and stakeholder engagement framework (EPR S03).</p> <p>Obtain consent for private and public land access.</p> <p>Implement the Marinus Link Sustainability Strategy.</p> <p>Engage a qualified and experienced IEA.</p> <p>Review and approve principal contractor’s environmental management plans.</p> <p>Monitor and report on compliance of all principal contractors with approval conditions in construction and operation.</p> <p>Review all audit reports prepared by the IEA for construction phase.</p> <p>Audit the operations principal contractor during the operations phase.</p> <p>Audit the principal contractor during the decommissioning phase.</p> <p>Prepare and publish annual audit summary reports for construction and operation.</p> <p>Provide the approved EMF, Alignment Plans, Development Plans and annual audit summary reports on a project website.</p> <p>Comply with duties under the EP Act during design, construction, operation and decommissioning as applicable, including:</p> <ul style="list-style-type: none"> <li>➤ General Environmental Duty (s25)</li> <li>➤ Duty to manage contaminated land (s39)</li> <li>➤ Duty to notify of certain contaminated land (s40)</li> <li>➤ Duties and controls relating to priority waste (s138-141)</li> </ul>
IEA – prior to construction	Verify compliance of the CEMP and sub plans with project approvals prior to construction.	<p>Review CEMP and sub plans and verify that they are consistent with the relevant requirements of the EMF and EPRs prior to commencing construction.</p> <p>Review plans prepared by principal construction contractors to comply with EPRs and provide guidance and advice on environmental risks and compliance issues. Make recommendations on appropriate measures to mitigate or avoid impacts.</p> <p>Provide a verification statement that CEMP and sub plans are consistent with the EMF, EPRs and approval conditions.</p>
IEA – during construction	Auditing and reporting of compliance with environmental obligations during construction	<p>Prepare an audit plan, including schedule and audit scopes, to the satisfaction of MLPL for each principal construction contractor works package and in accordance with the frequencies outlined in this EMF.</p> <p>Conduct audits of principal construction contractors’ construction works and the CEMP and sub plans to consider and recommend improvements to be made to work practices to avoid or minimise adverse impacts to environment and community.</p> <p>Prepare construction audit reports containing the results of each audit including any comment on compliance of the principal contractor with EP Act duties and evidenced by the materials reviewed by the auditor and provide to MLPL and the contractor.</p> <p>Review and provide comment on each principal construction contractor’s draft annual audit summary report which summarises compliance of the contractor with the EMF and EPRs addressed through the CEMP.</p> <p>The IEA must be a certified principal or lead auditor in environmental management systems under AS/NZS ISO 14001:2016 (or equivalent standard).</p>

Table 2-5 Contractors' roles and responsibilities

Agency or organisation	Role	Responsibilities for the Environmental Management Framework (EMF)
Principal construction contractors	Project delivery	<p>Comply with legislative and approval requirements, including the approved EMF with EPRs through design, construction, and commissioning.</p> <p>Develop environmental documentation and management plans in accordance with legislative and approval requirements, including this EMF and EPRs.</p> <p>Develop and implement a CEMP and sub plans for their scope of work including monitoring programs as required by EPRs.</p> <p>Have a corporate EMS certified to AS/NZS ISO 14001:2016 (or equivalent standard).</p> <p>Develop and implement a project specific EMS consistent with the principles of AS/NZS ISO 14001:2016 (or equivalent standard).</p> <p>Develop and implement a community and stakeholder engagement management plan in accordance with the MLPL framework (EPR S03).</p> <p>Provide adequate resources to comply with all environmental requirements and the community and stakeholder engagement management plan.</p> <p>Obtain secondary approvals and consents as required to facilitate the delivery of the relevant work package.</p> <p>Undertake regular internal audits (based on risks associated with the package of works) to assess and ensure compliance with approved CEMP, EPRs and other documentation required by the EMF.</p> <p>Assess and report on compliance with environmental obligations in accordance with the contract and take corrective action where necessary.</p> <p>In the event of an environmental incident, liaise with MLPL to report to EPA Victoria in accordance with the EP Act.</p> <p>Mandate sub-contractors' compliance with the EMF, EPRs, CEMP and other plans required by the EPRs, where relevant.</p> <p>Comply with duties under the EP Act during design and construction as applicable, including:</p> <ul style="list-style-type: none"> <li>➤ General Environmental Duty (s25)</li> <li>➤ Duty to respond to a pollution incident causing harm (s31)</li> <li>➤ Duty to notify of a notifiable pollution incident (s32-33)</li> <li>➤ Duty to manage contaminated land (s39)</li> <li>➤ Duty to notify of certain contaminated land (s40)</li> <li>➤ Duties relating to industrial waste (s133-137)</li> <li>➤ Duties and controls relating to priority waste (s138-141)</li> <li>➤ Duties and controls relating to reportable waste (s142-143)</li> </ul>
Operational contractor	Project operation and maintenance	<p>Develop and implement an OEMP for the project alignment, converter station, communications building and potential transition station, to comply with relevant sections the EMF and EPRs.</p> <p>Have a corporate EMS certified under AS/NZS ISO 14001:2016 (or equivalent standard).</p> <p>Develop and implement a project EMS consistent with the principles of AZ/NZS ISO 14001:2016 (or equivalent standard). Comply with duties under the EP Act, including:</p> <ul style="list-style-type: none"> <li>➤ General Environmental Duty (s25)</li> <li>➤ Duty to respond to a pollution incident causing harm (s31)</li> <li>➤ Duty to notify of notifiable pollution incident (s32-33)</li> <li>➤ Duty to manage contaminated land (s39)</li> <li>➤ Duty to notify of certain contaminated land (s40)</li> <li>➤ Duties relating to industrial waste (s133-137)</li> <li>➤ Duties and controls relating to priority waste (s138-141)</li> <li>➤ Duties and controls relating to reportable waste (s142-143)</li> </ul>

## 2.5 Environmental management documentation

The Environmental Management Framework requires the preparation of environmental management documentation to document mitigation measures to avoid, minimise, offset or manage environmental impacts during construction, operation and decommissioning. These documents will be prepared by MLPL and principal contractors. The environmental management documentation must comply with this Environmental Management Framework and the EPRs, and address relevant legislation, approval conditions, and contractual requirements.

The Compliance Management Standard will assign the applicability and allocation of requirements to project stages. Applicability is further refined for relevance to current scope of works during development of CEMP and sub plans. Where an EPR or other requirement is deemed not relevant to scope of works, it will be noted in the CEMP and/or relevant sub plan.

All documents and management plans required by the Environmental Management Framework and EPRs will be reviewed by MLPL prior to being verified by the IEA to comply with EPRs. The IEA will audit compliance of principal contractors with CEMPs and sub plans, as detailed in Section 2.7.2. Change management for environmental management documents is outlined in Section 2.6.

An overview of the key environmental documents required by the project is outlined in Table 2-6. This list focuses on the key documents and does not include all plans required by the EPRs.

The scope of the Environmental Management Framework is the documentation required to address the impacts identified in the EIS/EES and relevant legislative requirements.

Table 2-6 Preparation and approval of key environmental documents

Documentation	Description	Responsible for preparation	To review and/or verify	To consult, approve or endorse
Environmental Management Framework with EPRs (Condition of Incorporated Document)	<p>The Environmental Management Framework with EPRs provides the overarching governance framework for environmental management in accordance with the expected approval conditions that will apply to the project for construction, operation and decommissioning.</p> <p>The project EPRs outline the required environmental outcomes to be achieved during the delivery of the project. The EPRs were developed based on recommendations in technical studies prepared to inform the EIS/EES and commitments made by MLPL.</p> <p>This Environmental Management Framework and EPRs cover the requirements for the project under Victorian legislation and the EPBC Act, but do not include requirements under Tasmanian law.</p>	MLPL	MLPL (Review)	Minister for Planning (Vic) (Approve)
Alignment Plans and Development Plans (Conditions of Incorporated Document)	<p>Alignment Plans will show the final cable route and construction areas required for the transmission cables and associated easements within the SCO located in the Victorian jurisdiction. The plans will show the location of key project components including the shore crossing, joint pits, access roads and tracks, construction compounds, and the location of the converter station and the transition station if one is required.</p> <p>Development Plans will show the site layout plans and elevations for the converter station, communications building and potential transmission station.</p> <p>As required by the Incorporated Document, the project infrastructure must be developed generally in accordance with the approved Alignment Plans and Development Plans, unless the Minister for Planning provides further written consent.</p>	Contractors	MLPL (Review)	Minister for Planning (Vic) (Approve)
EMS (EPR EM01)	<p>MLPL and its principal contractors will each develop an EMS for delivery of the project in accordance with EPR EMF01. Each EMS will be developed and implemented in accordance with the principles of <i>AS/NZS ISO 14001:2016 Environmental management systems — Requirements with guidance for use</i> (or equivalent standard).</p> <p><b>Marinus Link EMS</b></p> <p>The MLPL EMS will provide the framework for addressing the statutory environmental duties under the EP Act and demonstrating compliance with the General Environmental Duty, and all project approvals and legal requirements.</p> <p>The scope of MLPL EMS is greater than this Environmental Management Framework as it will cover the project approval under Commonwealth, Victorian and Tasmanian jurisdictions.</p>	MLPL	-	-



Documentation	Description	Responsible for preparation	To review and/or verify	To consult, approve or endorse
	<p><b>Contractors EMS</b></p> <p>Principal contractors will be required to have an EMS certified to AS/NZS 14001:2016 (or equivalent standard).</p> <p>In accordance with this EMF, principal contractor must also develop a project specific EMS consistent with the principles of AS/NZS ISO14001:2016 (or equivalent standard).</p> <p>Contractors will be responsible for identifying the secondary consents and environmental approvals, licences, permits and consents in addition to complying with the project's EPRs, CEMP and OEMP.</p> <p>The principal contractor's project EMS will be verified by the IEA for compliance with the Environmental Management Framework and compliance with the EMS will be audited during construction in accordance with Section 2.7.</p>	Contractors	Independent Environmental Auditor (Verify)	-
CEMPs (EPR EM02)	<p>In accordance with EPR EM02, each principal contractor will be responsible for developing and implementing a CEMP with relevant sub plans that describe how the requirements of the Environmental Management Framework and EPRs will be complied with and implemented during their construction works.</p> <p>The CEMP and sub plans will include:</p> <ul style="list-style-type: none"> <li>➤ An environmental and sustainability policy.</li> <li>➤ A description of activities to be undertaken during construction</li> <li>➤ Environmental accountabilities and responsibilities of personnel</li> <li>➤ A procedure for identifying, managing and monitoring environmental risks specific to the construction activities to be undertaken by the principal contractor and any sub-contractors.</li> <li>➤ Measures to address the requirements of the Environmental Management Framework, EPRs, and the project approvals as it relates to the construction activities to be undertaken by the principal contractor and their sub-contractors.</li> <li>➤ The locations of and measures for protection of no-go zones.</li> <li>➤ A process for inspections and monitoring, auditing, and reporting.</li> <li>➤ Awareness and competency requirements in relation to environmental management for works for all personnel working on the project.</li> <li>➤ Communication requirements.</li> <li>➤ Procedures for identifying non-conformance and implementing corrective actions.</li> <li>➤ A protocol for incident notification and management.</li> <li>➤ A protocol for management of emergency events due to extreme weather events.</li> <li>➤ Each sub plan will include a matrix of relevant EPRs and where it is addressed.</li> <li>➤ Each sub plan will set objectives and targets and key performance indicators.</li> </ul>	Contractor	MLPL (Review)  Independent Environmental Auditor prior to and during construction (Verify)	MLPL (Approve)

Documentation	Description	Responsible for preparation	To review and/or verify	To consult, approve or endorse
	<p>The CEMP and sub plans will cover the requirements of the relevant approval documentation, EPRs, Environmental Management Framework and conditions of material permits and licences, the environmental provisions of the contract documentation and any management plans and/or documentation prepared by MLPL and required to be addressed for their scope of works. Sub-plans will also include contingency measures, where required.</p> <p>The CEMP and its sub plans must be informed by a detailed assessment of risks and impacts associated with the final project alignment, constructions methods and schedule that will be carried out by contractors. The risk assessment must be consistent with <i>AS/NZS ISO 31000 Risk management – principles and guidelines</i> and consider the issues identified through the EIS/EES process and the risks associated with delivery of the project works.</p> <p>The structure and title of sub plans has not been specified in the EMF or EPRs. This is to provide flexibility for MLPL and its principal contractors to determine the most effective way to document impacts and mitigation, and design measures for implementation.</p> <p>There will be separate management plans for terrestrial and marine construction activities. Marine activities will be managed in accordance with the management plan approved under the OEI Act and addressing any relevant conditions of the EPBC Act approval.</p>			
OEMP (EPR EM03)	The operation contractor will be responsible for developing and implementing an OEMP, in accordance with EPR EM03, that describes how the requirements of the EMF with EPRs will be complied with and implemented for specific locations and activities during operation. This will include routine and unplanned maintenance activities, contingency measures, monitoring and reporting.	Contractor	MLPL (Review)	MLPL (Approve)
Community and Stakeholder Engagement Framework (EPR S03)	<p>MLPL will develop project wide Community and Stakeholder Engagement Framework (CSEF) in accordance with EPR S03. The framework will outline how each Principal contractor will coordinate their communications and provide consistent information to stakeholders, community and directly affected landholders.</p> <p>The framework must include a process for managing and responding to complaints received during construction in accordance with the MLPL Public Enquiries and Complaints Management Procedure. The complaints management system must be consistent with <i>Australian Standard AS/NZS 10002: 2014 Guidelines for Complaints Management in Organisations</i>.</p>	MLPL	-	-

Documentation	Description	Responsible for preparation	To review and/or verify	To consult, approve or endorse
Community and Stakeholder Engagement Management Plans (EPR S03)	Principal contractors will be required to prepare a Community and Stakeholder Engagement Management Plan (CSEMP) demonstrating how they will comply with the requirements of the project CSEF, in accordance with EPR S03. The plan will outline requirements for all works sites and any sub-contractors engaged.	Contractors	MLPL (Review)	MLPL (Approve)
Other documents or plans required by the EPRs for construction	The EPRs set out the requirements for principal contractors to develop and implement other management plans and/or documents (not part of the CEMP) to avoid, minimise and mitigate impacts. All plans required under the EPRs are to be prepared by suitably qualified and experienced professionals, and will be reviewed and approved by MLPL prior to construction.	Contractors	MLPL (Review)	MLPL (Approve)
Decommissioning management plans (DMPs) (EPR EM05 and EM06)	<p>The contractor engaged for decommissioning will prepare the land and marine decommissioning management plans for the project in accordance with EPRs EM05 and EM06.</p> <p>These plans will be prepared and approved at least six months prior to the commencement of decommissioning, or at a time as agreed with the relevant authority.</p> <p>The plan will be prepared in accordance with the legislation and guidelines at the time of decommissioning. The plan will be informed by an assessment of the impacts of the proposed decommissioning activities and address the environmental conditions at the time.</p> <p>The land DMP will cover reinstatement and rehabilitation of land and be informed by consultation with relevant landholders.</p>	Contractors	MLPL (Review)	<p>Minister for Planning (Vic) (Approve land DMP)</p> <p>Offshore Infrastructure Regulator (Cwth) (Approve marine DMP)</p>

## 2.6 Change management

A performance-based approach has been adopted for the project approval and delivery. This approach encourages innovation in development of the design and construction of the project to determine how best to achieve the EPRs to avoid or minimise impacts.

The EIS/EES technical studies have assessed a concept design and survey area. The technical studies identified the potential for impacts of the alignment and construction methods proposed and considered potential mitigation measures to inform the development of EPRs.

Principal contractors must implement measures to comply with EPRs and deliver the project generally in accordance with the concept design assessed in the EIS/EES. The EPRs define the outcomes to be achieved and the contractor then determines how these outcomes are realised. This may result in changes to the concept design that was assessed in this EIS/EES.

The final design and construction method adopted for project delivery must comply with EPRs and be located within the area of the SCO. The final alignment and infrastructure within the SCO will be developed to meet the EPRs and be documented in Alignment Plans and Development Plans that will be approved by the Minister for Planning in accordance with the Incorporated Document. The draft PSA and Incorporated Document are further described in section 2.3.3 and allow for:

- Amendments to the location of the project alignment and infrastructure within Project Land, subject to approval of Alignment Plans and Development Plans by the Minister for Planning.
- Amendments to the location of the project alignment and infrastructure in Additional Land if approved by the Minister for Planning on the basis that the proposed change is largely consistent with the concept assessed and the location does not result in material adverse increase impacts compared to those assessed in the EIS/EES within the Project Land.

Changes following approval of Alignment Plans and Development Plans may arise due to:

- Principal contractor design and construction methods refinement as required to respond to onsite conditions.
- Outcomes of ongoing landholder engagement.
- Results of further geotechnical assessments.
- Unanticipated finds during construction.

No change will be proposed unless it has been agreed with the relevant landholder.

## 2.6.1 Change management procedure

All changes proposed to the project alignment and infrastructure must comply with the EPRs. Different processes will apply to changes depending on whether they are proposed within Project Land or Additional Land, as shown in Figure 5-3 and summarised in Table 2-7. Approval of any changes to the project alignment within Project Land or Additional Land must be approved by the Minister for Planning in accordance with the draft Incorporated Document.



Figure 5-3 Locations for different types of project changes

A flow chart of the change management processes is provided in Figure 5-4. If a change is proposed outside of the SCO3, appropriate approvals will be sought.

Table 2-7 Change management process summary

Change location	Process summary
Within Project Land	<ul style="list-style-type: none"> <li>Change proposed by MLPL or Contractor (including in response to landholder requests).</li> <li>Change to be incorporated into amended Alignment Plan or Development Plan (as required in draft Incorporated Document). Updated Plan to include the proposed location of the project alignment or infrastructure.</li> <li>Approval of the amended Plan to be sought from the Minister for Planning. If approval is provided in writing, the change can then be implemented.</li> </ul>
Within Additional Land – no material adverse increase in impacts	<ul style="list-style-type: none"> <li>Change proposed by MLPL or Contractor (including in response to landholder requests).</li> <li>Change to be incorporated into amended Alignment Plan or Development Plan (as required in draft Incorporated Document). Updated Plan to include the proposed location of the project alignment or infrastructure.</li> <li>Report to be prepared with the reasons for the change and supporting evidence to demonstrate that the change will not give rise to any material adverse increase in impacts compared to the location within the relevant Project Land.</li> </ul>

Change location	Process summary
	<ul style="list-style-type: none"> <li>Approval of the amended Plan to be sought from the Minister for Planning. If approval is provided in writing, the change can then be implemented.</li> </ul>
Within Additional Land – material adverse increase in impacts	<ul style="list-style-type: none"> <li>Change proposed by MLPL or Contractor.</li> <li>Discussions to be held with relevant agencies, DTP and/or the Minister for Planning to confirm relevant environmental impact assessment and approval process for change under the P&amp;E Act and other applicable legislation.</li> <li>Required approvals to be sought. If approvals are provided, the change can then be implemented.</li> </ul>

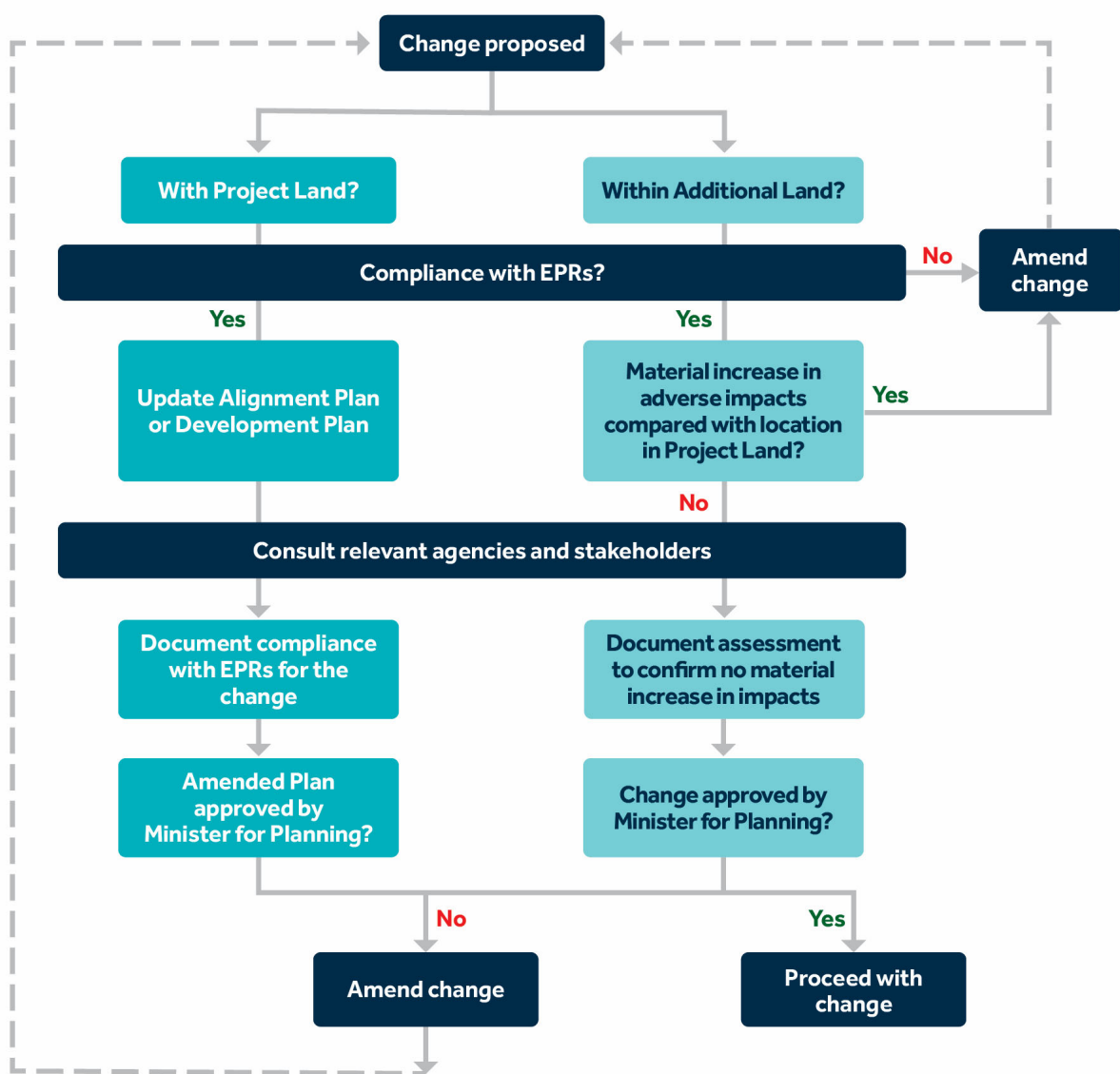


Figure 5-4 Change management process flow chart

## 2.6.2 Changes to documents

The documents and management plans listed in Table 2-6 will be controlled documents. The principal contractor's environmental management documents may require revision during construction.

Any revisions of documents and management plans will be subject to review, verification and approval by MLPL prior to works commencing. Review or approval of documents by regulators will only be required where expressly stated in project approvals.

Revisions to documents may be:

- Minor revisions – clarifications or improvements to environmental management practices, minor changes in work practices on site, or new controls being implemented. No new or increased environmental risk or impacts.
- Major revisions – significant changes to construction methods, environmental management procedures, scope of works. There is potential for, or will be, new or increased environmental risks.

Amendments to controlled documents will be assessed by applying the following process:

- Principal contractor to provide proposed change to controlled document to MLPL with an assessment demonstrating the proposed change complies with the project approvals and the Environmental Management Framework (including EPRs).
- MLPL to assess change against requirements of project approvals and the Environmental Management Framework (including EPRs).
- IEA to review changes to the CEMP and subplans, and verify that changes comply with the Environmental Management Framework and relevant EPRs.
- If the proposed change meets these requirements:
  - Minor revisions to be reviewed and approved by MLPL (unless additional approval is required by regulators).
  - Major revisions to the CEMP and sub plans in accordance with the EPRs will be provided to the IEA for review and verification. If the IEA verifies the changes are consistent with the requirements of the project approvals and Environmental Management Framework, the change will be approved by MLPL.
  - Major revisions to all controlled documents other than the CEMP and its sub plans will be provided to MLPL for review and approval. MLPL will verify the changes are consistent with the requirements of the project approvals and Environmental Management Framework.
- MLPL will engage with key agencies and stakeholders prior to submission of changes for approval.
- Regulator approval of the changes to be sought by the principal contractor or MLPL, if required.
- Change to be implemented by the principal contractor once MLPL and regulator approval provided.
- If changes to controlled documents are proposed that do not meet the requirements of project approvals or the Environmental Management Framework these will be discussed with the relevant regulator and amendments made to the change request, or the necessary approvals may be sought.

## 2.7 Evaluating compliance

Compliance with this Environmental Management Framework, EPRs and project approvals will be monitored, audited and reported on. MLPL and its principal contractors will have responsibilities to evaluate compliance during design development, construction, operation and decommissioning. The IEA will have a role in evaluating compliance with EPRs relevant to the CEMP during design and construction.

Evaluating compliance will consider:

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

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

### 2.7.1 Monitoring

Monitoring programs will be required to comply with some EPRs and to be undertaken prior to and during construction and operation. Whilst measures implemented to comply with all EPRs will be monitored, inspected, or audited to confirm actions are being undertaken to comply with EPRs, issue-specific monitoring programs will only be implemented in accordance with regulatory requirements where required and will be commensurate to the level of potential risk and impact to the environment or human health. Each issue-specific monitoring program will address the requirements of the relevant EPR, be detailed in the relevant CEMP sub plan, and be verified by the IEA.

The CEMP sub plans will document the monitoring programs to comply with EPRs. Where a particular requirement of the EPRs is not relevant to the works to be undertaken by a particular principal contractor, the rationale for this to be excluded from that contractor's CEMP must be documented and verified by the IEA.



The monitoring programs must:

- Address all relevant guidelines and regulations as required by the EPRs and environmental legislation.
- Outline monitoring objectives.
- Detail the method, parameters, location and frequency.
- Consider specific, measurable, achievable, realistic and timely (SMART) principles.
- Include calibration requirements for equipment and staff competencies or qualifications in implementing the monitoring and inspection programs.
- Outline parameters to indicate if non-compliance with EPRs could occur and what corrective actions should be taken if non-compliance occurs.
- Specify reporting requirements and provision of data to MLPL and IEA.

Contractors will be responsible for maintaining their baseline and monitoring data. Any changes to monitoring programs will be managed by the change management process for documents outlined in Section 2.6. A summary of the EPRs that require a monitoring program involving the collection and analysis of samples are set out in Table 2-8. The outcomes of monitoring programs will be audited as outlined in Section 2.7.2.

Table 2-8 EPRs that require monitoring with the collection and analysis of samples prior to and during construction

EPR Number	EPR title
<b>Groundwater</b>	
GW06	Undertake groundwater monitoring to establish baseline groundwater conditions and monitor potential impacts in higher impact areas
<b>Noise and vibration</b>	
NV01	Conduct additional background noise monitoring
NV03	Develop a detailed noise and vibration impact assessment for construction activities at specific sites
<b>Surface water</b>	
SW03	Develop and implement a surface water monitoring program

MLPL and the IEA will monitor the principal contractor’s performance and compliance through review of environmental documentation (Section 2.5), audit results (Section 2.7.2) and reports (Section 2.7.3). The IEA will audit the compliance of each principal contractor with their CEMP and sub plans. The MLPL EMS will outline the process for tracking compliance with all other EPRs that MLPL is responsible for.

## 2.7.2 Auditing and inspections

MLPL, the IEA and principal contractor all have key roles to play in verifying compliance and mitigation of impacts throughout the project construction.

The IEA will audit compliance of each principal contractor with their CEMP and sub plans during construction, including review and verify any proposed major revisions to the CEMP and sub plans. The audit scopes and schedule will be reviewed and approved by MLPL.

The IEA will audit all CEMPs and sub plans in accordance with the frequency in Table 2-9. The IEA will produce an audit report following the conclusion of each audit, as well as an annual summary to be provided to MLPL and the principal contractor.

Any non-conformances identified during an audit must be addressed in accordance with the Environmental Management Framework, including implementing corrective actions as soon as practicable. MLPL will communicate findings across the organisation and other works packages where relevant.

Any major revisions required to the CEMP and sub plans following IEA audits must follow the change management process, as outlined in Section 2.6.

MLPL will agree the scope of IEA audits for the CEMP and sub plans, and participate in audits where required. MLPL will audit compliance with all other EPRs and approval conditions that are not addressed by the CEMP.

MLPL will also carry out audits during operation of the project to confirm compliance with the OEMP and approval conditions in accordance with their EMS. The MLPL operational audits will review necessary records, reports and data including the outcomes of regular maintenance and cable inspections, repairs and responses to any incidents or complaints.

### Audit requirements and frequency

Audits by the IEA will have regard to the *AS/NZS ISO 19011 Guidelines for auditing management systems*. The audit will begin upon commencement of construction. Compliance will be assessed through a combination of site-based observation of project activities, interviews and review of documents and records.

The results of each audit, including audit evidence relied on, will be documented in an audit report. The audit template will be reviewed and agreed with MLPL prior auditing. An overview of the audit requirements and frequency is provided in Table 2-9.

The outcomes of audits will be made available to MLPL as required under the contract, and IEA during the audit process.

Table 2-9 Overview of audit requirements and frequency

Audit	Scope	Minimum frequency	Responsibility		
			MLPL	Contractor	IEA
Environmental Management Framework and EPR compliance during construction	<p>Contractors and MLPL compliance with the Environmental Management Framework, EPRs, conditions of project approvals.</p> <p>Audit scope to be developed using a risk-based approach so that higher risk activities and associated EPRs audited more frequently.</p> <p>Audit scope must include verifying compliance with the Environmental Management Framework, EPRs, CEMP and sub-plans including the effectiveness of site specific environmental controls.</p> <p>Compliance with every EPRs to be audited annually.</p> <p>Audits will occur during construction</p>	Quarterly	<p>Engage IEA</p> <p>Participate in audits</p>	Participate in audits	Conduct audit
Internal audits during construction	<p>Contractor audit of environmental performance considering compliance with the Environmental Management Framework, EPRs and project approvals; monitoring results and effectiveness of monitoring programs; response to non-conformances and complaints; and where continuous improvement has been demonstrated.</p> <p>Audit scope to be developed using a risk-based approach so that higher risk activities and associated EPRs audited more frequently.</p> <p>All EPRs must be audited annually.</p> <p>Audits conducted in accordance with requirements of the contractor's EMS.</p> <p>Principal contractors will also audit all sub-contractors they have engaged.</p>	Bi-annual	N/A	Conduct audit	N/A
Environmental Performance during operation	In accordance with the MLPL EMS, assess compliance of operator against the OEMP and project approvals annually in operation.	Annual	Conduct audit	Participate in audit	N/A

## Environmental inspections

Environmental inspections will include surveillance to verify adequacy of environmental mitigation measures. The CEMP and sub-plans will detail the procedure and frequency for environmental inspections. MLPL will undertake regular site inspections at any location and at a frequency to be agreed with the principal contractor based on the risk of activity. The principal contractor will regularly inspect the works of all sub-contractors engaged to confirm compliance with the CEMP and sub-plans.

### 2.7.3 Reporting

Reporting will document how compliance with the Environmental Management Framework, EPRs and project approvals has been achieved.

#### MLPL and Independent Environmental Auditor

The IEA will prepare reports following the completion of each audit of each principal contractor's CEMP and sub-plans. The audit reports will describe the audit activities, findings, the status of actions taken to address any previous audit findings, and compliance with the project approvals.

MLPL will provide annual audit summary reports to the Minister for Planning on the project's compliance with project approvals and summarise the outcomes of the IEA audits during construction. These reports will also be made available on the project's website.

MLPL will audit contractor performance during operation and prepare annual audit summary reports. These reports will be made available on the project's website.

## Contractors

Contractors will provide quarterly reports to MLPL that document how they have complied with the Environmental Management Framework, EPRs, project approvals and all relevant environmental legislation.

The reports will include, but will not be limited to, the following:

- Compliance with EPRs as relevant to the works performed including monitoring and inspections results.
- Copies of consents, licenses and approvals obtained, and correspondence with regulators and agencies.
- Copies of environmental baseline monitoring and site inspection results.
- Results of internal audits.
- Environmental incidents and corrective actions reports.
- Summary of consultation to relevant government agencies and regulatory authorities.
- Summary of consultation with the community and stakeholders, including any complaints received and corrective actions.
- Waste tracking information.
- Sustainability data.
- Records of environmental competency training.

## 2.8 Environmental Performance Requirements

The EPRs establish the environmental outcomes that must be achieved through the design, construction, operation and decommissioning of the project. The EPRs facilitate the adoption of effective avoidance and mitigation measures so that the project is delivered and operated in accordance with the expectation of stakeholders and in accordance with the project approvals.

Some EPRs apply to the whole of the project, and others apply to specific activities, specific impacts, or specific locations. Compliance with EPRs may be staged including where relevant to commencement of construction of each stage of project works or in specific locations. The Compliance Management Standard will identify the applicability and allocation of EPRs to project stage during construction.

### 2.8.1 Approach

The EPRs are a set of performance-based standards that have been developed to address the environmental risks and impacts assessed in the EIS/EES so that impacts to environmental values are avoided or minimised to the extent reasonably practicable during construction, operation and decommissioning of the project.

The performance-based approach promotes innovative and site-specific design solutions and mitigation measures to be adopted during the construction, operation and decommissioning of the project. All contractors are required to demonstrate how risks to human health and the environment have been avoided or minimised.

The EPRs have been developed through preparation of the EIS/EES technical studies and informed by relevant legislation, policy and guidelines. Where activities for the project result in risk of harm to human health or the environment from pollution or waste, the general environmental duty under the EP Act also requires all contractors to eliminate or minimise the risk of harm, to the extent reasonably practicable. Section 25 of the EP Act sets out minimum standards to comply with the duty and section 6(2) of the EP Act states that in determining what is reasonably practicable, regard must be had to the following matters:

- The likelihood of those risks eventuating.
- The degree of harm that would result if those risks eventuated.
- What the person concerned knows, or ought reasonably to know, about the harm or risks of harm and any ways of eliminating or reducing those risks.
- The availability and suitability of ways to eliminate or reduce those risks;
- The cost of eliminating or reducing those risks.

Principal contractors will determine the most effective mitigation methods to reduce or avoid environmental impacts to comply with EPRs through implementing specific mitigation measures. In accordance with the EP Act, the measures adopted will consider the current state of knowledge about impact mitigation, best practice and any feasible innovations, technologies and methods that are suitable and practical for the nature of the project and its location.

Compliance with EPRs through applying mitigation measures will be verified by the IEA prior to and during construction. This will include the CEMPs with subplans, and other management plans, as required by the EPRs and this Environmental Management Framework. The effectiveness of the mitigation measures to achieve the EPRs will be evaluated in accordance with Section 2.7.

## 2.8.2 Consultation and engagement

Through the development of the EIS/EES, the issues and priorities of affected stakeholders, including government and regulatory bodies, landholders and the broader community have been incorporated into the EIS/EES and reflected in the EPRs for the project. In accordance with EPR S03, MLPL will prepare a community and stakeholder engagement framework and each principal contractor will prepare a community and stakeholder engagement management plan. A process for recording, managing and resolving complaints received from affected stakeholders will be developed and implemented in accordance with the EPR S03.

As EPRs are performance based, they often refer to a management plan being developed in consultation with or informed by consultation. Plans will be developed in accordance with the relevant EPRs and as required by project approvals.

The purpose of consultation is to facilitate the views and understanding of priorities of affected stakeholder when implementing measures to comply with the EPRs and developing management plans. Consultation will involve government agencies, First Peoples, key stakeholders including landholders, and emergency services where appropriate.

The consultation required by the EPRs will commonly occur in the form of meetings and workshops, and the exchange of information in other formats provided by MLPL or its principal contractors. The requirement for formal written correspondence, or to supply draft plans for formal written comments to particular stakeholders is not required unless specified in a statutory approval. Consultation outcomes will be documented to demonstrate compliance with the EPRs and be shared with relevant stakeholders to outline how feedback, where appropriate and reasonable, has been addressed.

Where an EPR states that a plan or design must be developed in consultation with a stakeholder, all reasonable endeavours must be undertaken to engage with that stakeholder and seek comments. If a stakeholder does not respond within a reasonable period of time, the requirement will be deemed to have been satisfied.

Where an EPR requires an agreement to be made between MLPL or principal contractor with a third party, all reasonable endeavours must be undertaken to reach agreement. Where an agreement cannot be reached, MLPL or the principal contractor will document what has been done to reach agreement and this will be reported to the Minister for Planning.

### 2.8.3 Recommended EPRs

The EPRs presented in this section cover project activities to be undertaken in Victoria and the marine environment of Bass Strait (Table 2-10). Separate EPRs have also been included for the Heybridge converter station site in Tasmania covering ecology and social matters considered by the EPBC Act (Table 2-11).

When an EPR refers to a plan being prepared in accordance with a particular EPA publication, or other regulatory guidance/standard, this refers to the version of that document that is in force at the time the plan is being prepared. If a guidance document referred to in an EPR has been superseded prior to preparation of the relevant plan in compliance with the EPR, the plan should be prepared in accordance with the version or document that the regulator states supersedes the original publication. If updates to such guidance documents occur after submission of a plan for approval, update is not necessarily required, unless required by relevant law or regulation, or as an outcome of an audit as set out in this Environmental Management Framework.

Table 2-10 Recommended EPRs for Victoria and marine areas, as relevant

EPR ID	Environmental Performance Requirements
<b>Environmental Management</b>	
EM01	<p><b>Deliver the project in general accordance with an Environmental Management System</b></p> <p>Develop, implement and maintain an Environmental Management System (EMS) that conforms to <i>AS/NZS ISO 14001:2016 Environmental Management Systems – Requirements with guidance for use</i> (or equivalent standard). The EMS must be implemented during construction, operation and decommissioning of the project.</p> <p>Principal contractors must have an EMS that is certified to AS/NZS ISO 14001:2016 or equivalent standard.</p>
EM02	<p><b>Construct the project in accordance with management plans</b></p> <p>Prepare a Construction Environmental Management Plan (CEMP) for terrestrial and marine works in accordance with the Environmental Management Framework prior to the commencement of construction. The CEMP must be developed in consultation with relevant stakeholders. Relevant stakeholders are identified in Environmental Performance Requirements (EPRs), or as required by project approvals, legislation or guidelines.</p> <p>The CEMP must be developed with reference to the current state of knowledge, best practice and EPA Publication 1834.1 <i>Civil construction, building and demolition guide</i>. The CEMP and sub plans are to be verified by the Independent Environment Auditor (IEA) prior to construction.</p> <p>The extent and title of CEMP sub plans will be determined by the principal contractor. The CEMP sub plans must address applicable EPRs including those relevant to surface water and waterway crossings, groundwater, ground movement, contaminated land and acid sulfate soils, ecology and vegetation, air, noise, bushfire protocols, weed and pest management.</p> <p>The CEMP must be implemented for the duration of construction, or where staged, for the duration of the staged construction.</p>
EM03	<p><b>Operate the project in accordance with management plans</b></p> <p>Develop an Operation Environmental Management Plan (OEMP) prior to the commencement of operation of the project. The OEMP must:</p> <ul style="list-style-type: none"> <li>➤ Be developed in consultation with relevant stakeholders as listed in the Environmental Management Framework or as required by project approvals, legislation or guidelines.</li> <li>➤ Address the management of extreme or chronic weather (EPR CC01).</li> <li>➤ Consider the management plans implemented during construction and if any measures are relevant for operation.</li> </ul> <p>The OEMP must outline the framework for ongoing engagement with stakeholders and landholders during operation of the project.</p> <p>The OEMP must be implemented during operation.</p>



EPR ID	Environmental Performance Requirements
EM04	<p data-bbox="387 295 922 327"><b>Audit and report on environmental compliance</b></p> <p data-bbox="387 343 2027 422">Appoint an Independent Environmental Auditor (IEA) that is appropriately qualified to verify compliance of the CEMP with the Environmental Management Framework and EPRs prior to construction and audit compliance of principal contractors with their CEMP and sub plans during construction. The IEA must prepare an audit report after each audit and provide an annual summary of the outcomes to Marinus Link Pty Ltd (MLPL).</p> <p data-bbox="387 438 2094 526">MLPL will audit compliance with all EPRs in construction that are not addressed as part of the CEMP. MLPL will prepare an environmental compliance summary report of the outcomes of all audits undertaken by the IEA and MLPL to determine compliance with the environmental management framework, EPRs and approval conditions over the previous 12 months during construction. The summary report will be provided to the Minister for Planning.</p> <p data-bbox="387 542 1249 574">MLPL will audit compliance with all EPRs during operation and decommissioning.</p>
EM05	<p data-bbox="387 614 1153 646"><b>Develop and implement a land decommissioning management plan</b></p> <p data-bbox="387 662 2094 718">Prior to the commencement of decommissioning, prepare a land decommissioning management plan with the objective of leaving a safe, stable and non-polluting environment, and minimising impacts during the removal of infrastructure.</p> <p data-bbox="387 734 940 766">The land decommissioning management plan must:</p> <ul data-bbox="387 774 2094 1061" style="list-style-type: none"> <li>Identify above-ground and below-ground infrastructure proposed to be removed or left in situ.</li> <li>Assess potential impacts of decommissioning activities for the removal or retention of infrastructure.</li> <li>Describe measures to be implemented to avoid or reduce impacts from the removal or retention of infrastructure.</li> <li>Include a rehabilitation and monitoring program to return the land surface to a condition consistent with pre-construction conditions or a condition consistent with the proposed land use.</li> <li>Consider management measures adopted in construction and apply these where similar impacts could occur.</li> <li>Comply with the requirements of relevant legislation and guidelines at the time of decommissioning.</li> <li>Apply the waste management hierarchy for removed materials.</li> <li>Be consistent with the Marinus Link Sustainability Framework.</li> </ul> <p data-bbox="387 1077 2094 1133">The land decommissioning management plan is to be developed in consultation with landholders, relevant stakeholders and regulator/s. The plan must meet the relevant requirements of legislation and guidelines at the time of decommissioning and be approved by the Minister for Planning.</p> <p data-bbox="387 1149 1713 1181">The plan will be prepared and approved 6 months prior to decommissioning or at a time as agreed with the relevant authority.</p> <p data-bbox="387 1189 1377 1216">The land decommissioning management plan must be implemented during decommissioning.</p>

**EPR ID      Environmental Performance Requirements**

**EM06      Develop and implement a marine decommissioning management plan**

Prior to the commencement of decommissioning, prepare a marine decommissioning management plan with the objective of leaving a safe, stable and non-polluting environment, and minimising impacts during the removal of infrastructure.

The marine decommissioning management plan must:

- Identify marine infrastructure proposed to be removed or left in situ.
- Assess potential impacts of decommissioning activities for the removal or retention of infrastructure.
- Outline how activities associated with subsea cable decommissioning are to be carried out in accordance with the Offshore Electricity Infrastructure (OEI) Act licence.
- Describe measures to be implemented to avoid or reduce impacts from the removal of infrastructure (if required).
- Consider management measures adopted in construction and apply where similar impacts could occur.
- Comply with the requirements of relevant legislation and guidelines at the time.
- Apply the waste management hierarchy for removed materials.
- Be consistent with the Marinius Link Sustainability Framework.

The marine decommissioning management plan is to be developed in consultation with land managers, relevant stakeholders and regulator/s. The plan must meet the relevant requirements of legislation and guidelines at the time of decommissioning. The marine decommissioning management plan must be implemented during decommissioning.

**EM07      Develop and implement a waste management plan**

Prior to commencement of project works prepare a waste management plan. The waste management plan must detail measures to apply the waste management hierarchy to construction and operation of the project and comply with the requirements of the Victorian Environment Protection Authority (EPA Victoria) as well as the project approvals.

The WMP must:

- Identify the sources and types of waste through all stages of construction and operation including controlled and prescribed waste expected to be produced during construction and operation.
- Classify waste under the applicable regulations in each jurisdiction.
- Outline how the waste management hierarchy of avoidance, reuse, recycling and disposal has been applied to the management of wastes during construction and operation.
- Identify environmental risks with the waste expected to be generated and how they will be managed, reuse, recycled or disposed of.
- Detail the approach to management of all types of waste including any safe handling, storage, and disposal requirements and any licensing, tracking and reporting requirements.
- Outline how wastes will be monitored and reported.

The waste management plan must be implemented during construction, operation and decommissioning.

EPR ID	Environmental Performance Requirements
EM08	<p data-bbox="389 300 1279 325"><b>Develop and implement a strategy for ongoing engagement with First Peoples</b></p> <p data-bbox="389 344 2018 400">MLPL will develop and implement a strategy for ongoing engagement with First Peoples in Victoria and Tasmania during construction and operation of the project.</p>
<b>Aboriginal and historical cultural heritage</b>	
CH01	<p data-bbox="389 504 1872 529"><b>Develop and implement a historical heritage management plan to avoid and minimise impacts to historical cultural heritage values</b></p> <p data-bbox="389 549 2013 603">Prior to commencement of project works prepare a historic heritage management plan. The plan must be prepared by a suitably qualified archaeologist in consultation with Heritage Victoria. The plan must include:</p> <ul data-bbox="389 612 2069 1091" style="list-style-type: none"> <li data-bbox="389 612 752 638">/ An unexpected finds protocol.</li> <li data-bbox="389 644 808 670">/ Artefact and site recognition guide.</li> <li data-bbox="389 676 837 702">/ Artefact and site recording standards.</li> <li data-bbox="389 708 909 734">/ Artefact management and retention protocol.</li> <li data-bbox="389 740 2069 995">/ Measures to avoid impacts to the brick cistern located at Moores Rd, Buffalo, including:               <ul data-bbox="465 778 1856 995" style="list-style-type: none"> <li data-bbox="465 778 1352 804">o Confirmation of the cistern site’s boundary by a suitably qualified archaeologist.</li> <li data-bbox="465 810 1498 836">o Installation of a barrier around the site when construction activities are in proximity to the site.</li> <li data-bbox="465 842 1317 868">o Training to prevent access to the site by project employees and contractors.</li> <li data-bbox="465 874 1856 900">o Reference to the site and protection measures in daily toolbox meetings when construction activities are in proximity to the site.</li> <li data-bbox="465 906 1308 932">o Periodic inspections to confirm the barrier around the site remains in place.</li> <li data-bbox="465 938 2069 995">o Monitoring during construction for vibration related impacts if required under the noise and vibration construction management plan prepared under EPR NV02.</li> </ul> </li> <li data-bbox="389 1002 734 1027">/ Cultural awareness training.</li> <li data-bbox="389 1034 2047 1091">/ Procedure for historical cultural heritage inductions to be delivered to all project staff and contractors managing or directly undertaking ground disturbing activities.</li> </ul> <p data-bbox="389 1107 936 1133">The plan must be implemented during construction.</p> <p data-bbox="389 1149 1415 1174">As part of the OEMP, include measures to ensure protection of the brick cistern during operation.</p>
CH02	<p data-bbox="389 1225 1308 1251"><b>Comply with the Cultural Heritage Management Plans (CHMPs) 18201 and 18244.</b></p> <p data-bbox="389 1270 2092 1324">Implement and comply with CHMPs 18201 and 18244, prepared by qualified Heritage Advisors recognised under s 189 of the <i>Aboriginal Heritage Act 2006 (Vic)</i>, and approved in accordance with Division 5 (ss. 61-66A) of the <i>Aboriginal Heritage Act 2006 (Vic)</i>.</p> <p data-bbox="389 1340 1323 1366">The CHMPs must be implemented and complied with during construction and operation.</p>

**EPR ID      Environmental Performance Requirements**

**CH03      Develop a cultural values assessment for land and sea country with First Peoples**

As part of the strategy developed for EPR EM08, continue working with First Peoples in Victoria and Tasmania about intangible heritage values and develop an understanding of terrestrial and submerged intangible values. Work with First Peoples to prepare cultural values assessments for each group, and incorporate the results relevant to the Victoria jurisdiction into the two CHMPs referenced in EPR CH02.

**Agriculture**

**A01      Complete property condition surveys prior to construction**

Prior to commencing project works, complete property condition surveys for each property to be disturbed during construction to document existing conditions.

The property condition surveys should document all key activities on the property and infrastructure that could be directly or indirectly impacted, whether within or adjacent to the construction corridor. This could include, but not be limited to:

- Existing pasture or current crop.
- Existing ground profile including levels and slope.
- Existing drainage and surface water management.
- The type and condition of fencing, gates and other farm infrastructure including but not limited to stockyards, stock water troughs, water supply systems, and temporary and permanent farm buildings.
- The type (tree species) and condition of shelter belts and windbreak plantings.
- The type and condition of access tracks and laneways including surface material, and culverts and bridges.

The property condition survey should be supported by a photographic or video record.

A property condition report must be prepared and a copy provided to the landholder.

**A02      Develop and implement property management plans to avoid or minimise impacts on agricultural and forestry properties**

Prior to commencing project works on each agricultural or forestry property, develop a property management plan. The property management plan must outline property specific measures to avoid or minimise disruption to farm or forestry infrastructure, practices and operations to prevent reducing the carrying capacity of the property or its yield during construction and in operation.

The property management plan must be informed by the property condition survey (EPR A01) and be prepared in consultation with the landholder. A property management plan may include:

- Summary of existing farming practices and farm development plans relevant to project works.
- Controls to minimise disturbance to farm infrastructure, farming practices, property operations and maintenance, activities that must occur seasonally for farming practices and plantations, forestry activities and practices. This must include consideration of:
  - Impacts on grazing and crop growing practices
  - Impacts on livestock management

- Forestry operations
- ✓ Communication protocol reflecting preferences advised by the landholder, to be utilised by MLPL, contractors and any other relevant parties through construction of the project.
- ✓ The communication protocol must include:
  - Provision of a program of works for the property to the landholder at least one month prior to activities commencing on that property.
  - If the program of works is not continuous, the arrangements to manage and maintain worksites between staged construction activities will also be communicated.
  - Notification timeframes and nominate MLPL and principal contractor representatives responsible for managing access and responding to agricultural landholder issues and complaints. The nominated person must be available to respond to landholder issues daily.
- ✓ Details of access arrangements including:
  - property entry and exit points for all construction, operation and maintenance vehicles
  - no go areas
  - maintenance of landholder access to farm or forestry operation areas and farm infrastructure
  - maintenance of stock, landholder access to water supplies (or alternatives provided)
  - limits on timing and duration of access to a property.
- ✓ Location, construction method, material type (including materials to avoid damage or injury to stock), duration of use (i.e. temporary or permanent), maintenance responsibilities and requirements, and requirements for removal of temporary access tracks.
- ✓ Measures to avoid, so far as reasonably practicable, impacts on land capability outside the construction corridor, laydown areas and access tracks during construction.
- ✓ Type and location of fences or barriers to demarcate the construction corridor and associated workspace, provide stock crossings and restrict stock access.
- ✓ Farm water supply arrangements during construction including temporary diversion or realignment of water supply infrastructure or alternative water supply arrangements.
- ✓ Measures to avoid impacts on tree protection zones including for isolated trees and stands, shelter belts and windbreak plantings.
- ✓ Measures to avoid impacts to farm infrastructure including services, sheds, feed store locations and other facilities.
- ✓ Biosecurity controls to be implemented to prevent the introduction and spread of animal and plant pathogens, pests and weeds. Controls should be informed by a risk assessment for each property, comply with the requirements of the *Catchment and Land Protection Act 1994 (Vic)*, and be developed in consultation with Agriculture Victoria.
- ✓ Controls during wet weather to avoid damaging access tracks, infrastructure and paddocks.
- ✓ Controls to minimise dust impacts on farmhouses and farm worker accommodation, farm water supplies fed by water collected from rooves, animal nurseries, animal handling facilities including stockyards and dairies, farm orchards and vegetable patches, crops and pasture, and solar panels. Controls to minimise and manage these impacts must be included in the construction dust management plan required by EPR AQ01.
- ✓ For forestry properties, bushfire management protocols.
- ✓ Requirements for progressive reinstatement and rehabilitation including:
  - Reinstatement of farm infrastructure removed or altered to facilitate construction, to the same or better standard as outlined in the property condition report (EPR A01) or to a condition agreed with the landholder.

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- Rehabilitation of soils and rehabilitation of land to the same gradient, drainage and condition as prior to construction and outlined in the property condition report (EPR A01) prior to construction or to a condition agreed with the landholder. Rehabilitation requirements must include details of seed, lime, gypsum and fertiliser type; mix of plants for revegetation, and consideration of cropping and grazing cycles, where relevant.
- ✓ Process for review and revision of property management plans and property condition reports in response to changes identified during construction.

The property management plans must be implemented during construction.

**A03**
**Develop and implement property soil management plans to avoid or minimise impacts on agricultural and forestry properties**

Prior to commencing of project works on each agricultural or forestry property, develop a property soil management plan in consultation with the landholder. Each property soil management plan must include the following, as a minimum:

- ✓ How management of the soil horizons will be achieved during construction including delineation and separate stockpiling of soil horizons.
- ✓ Measures to delineate and separate stockpiles of A and B horizon soils and any major delineation of the B horizon to avoid soil inversion and mixing.
- ✓ Measures to avoid impacts on soil fertility through:
  - stripping and separately stockpiling topsoil
  - excavating and separately stockpiling subsoil
  - managing topsoil and subsoil stockpiles to avoid erosion and mixing
  - reinstating subsoil and topsoil based on documented soil horizons to avoid mixing
  - compacting subsoils to 85% of in-situ soil strength to minimise slumping and erosion
  - minimising soil compaction of topsoils
  - deep cultivation during reinstatement to manage soil compaction and maintain soil moisture content.

The soil management plan must be a sub plan to the property management plan for each property and be implemented during construction.

**A04**
**Develop and implement a rehabilitation strategy to avoid or minimise impacts on agricultural and forestry properties**

Prior to commencement of project works, develop a strategy for progressive rehabilitation of disturbed areas not being used for permanent infrastructure.

The rehabilitation strategy must include:

- ✓ Requirements for rehabilitation of soil, surface contours and drains damaged or temporarily diverted during construction.
- ✓ Requirements for use of appropriate seeds and fertilisers for revegetation.
- ✓ Criteria for successful reinstatement and rehabilitation, and revegetation including soil capacity, pasture or crop health, and weed type and density.
- ✓ Details of an inspection program to be completed for a minimum of two years after completion of rehabilitation, to determine the success of rehabilitation. Inspections are required quarterly in the first year, twice in the second year after the completion of rehabilitation, and within two weeks of storm events.
- ✓ A procedure to manage locations where the success criteria has not been met and where additional work is required.

The rehabilitation strategy must be implemented until the rehabilitation criteria are achieved for all properties where construction activities disturb ground.

EPR ID	Environmental Performance Requirements
A05	<p data-bbox="389 300 920 328"><b>Avoid impacts on organic farming certification</b></p> <p data-bbox="389 344 2083 400">Prior to commencing project works on each certified organic farming property, develop measures to be implemented in construction to avoid impacts on organic farming and organic farming certification.</p> <p data-bbox="389 416 1980 475">These measures must be informed by advice provided or guidelines published by approved organic certifying bodies registered by the Commonwealth Department of Agriculture, Fisheries and Forestry and be developed in consultation with organic farm landholders.</p>
A06	<p data-bbox="389 520 1753 549"><b>Develop and implement measures to avoid or minimise impacts on agricultural and forestry properties during operation</b></p> <p data-bbox="389 564 1872 593">As part of the OEMP, develop measures to avoid or minimise impacts on agricultural and forestry properties. These measures must include:</p> <ul data-bbox="389 601 1839 794" style="list-style-type: none"> <li data-bbox="389 601 1576 630">/ Communication protocols with landholders to facilitate site access for inspection and maintenance activities.</li> <li data-bbox="389 635 1597 663">/ Biosecurity protocols to prevent the introduction and spread of animal and plant pathogens, pests and weeds.</li> <li data-bbox="389 668 936 697">/ Protocols for accessing certified organic farms.</li> <li data-bbox="389 702 1839 730">/ Measures for soil management and land reinstatement and rehabilitation in the event that excavations are required for maintenance.</li> <li data-bbox="389 735 1675 764">/ Measures to avoid impacts to farming and forestry infrastructure, practices and operations during operation activities.</li> <li data-bbox="389 769 786 798">/ Bushfire management protocols.</li> </ul>

**EPR ID**
**Environmental Performance Requirements**
**Air quality**

AQ01

**Develop and implement a construction dust management plan**

Prior to commencement of project works, develop a construction dust management plan that documents measures to avoid, minimise and mitigate dust emissions. The construction dust management plan must:

- ✓ Identify sources of dust and airborne pollutants, including diffuse sources and the location of sensitive receptors in accordance with EPA Victoria *Publication 1943 – Guideline for assessing nuisance dust*.
- ✓ Describe dust management measures to be adopted in construction considering:
  - Earthworks, exposed areas and stockpiles
  - Access tracks and haul routes
  - Construction vehicles and equipment
  - Construction materials, transport, handling and storage
  - Waste management transport, handling and storage
- ✓ Describe measures to avoid and, where avoidance is not practicable, reduce the risk of harm from air emissions so far as reasonably practicable to minimise impacts on health, safety or amenity in accordance with EPA Victoria *Publication 1820.1 – Guide to preventing harm to people and the environment*.
- ✓ Describe inspection requirements for construction areas to monitor implementation of controls.
- ✓ Define roles and responsibilities of the contractors, and how implementation of dust management measures will be communicated.
- ✓ Outline a process to address complaints related to dust and dust events and identify opportunities for continual improvement of air quality impacts from construction.
- ✓ Outline a process for review and improvement of dust and emission reduction and management measures.
- ✓ Consider the mitigation measures presented in the Air Quality impact assessment prepared for the Marinus Link EIS/EES including mitigation for cumulative impacts.

AQ02

**Develop and implement measures to manage emissions to air during operations**

As part of the OEMP, develop measures to avoid or minimise air quality impacts. These measures must include consideration of:

- ✓ Converter station site maintenance and exposed soil areas
- ✓ Access roads
- ✓ Vehicles and equipment
- ✓ Waste management



EPR ID	Environmental Performance Requirements
<b>Bushfire</b>	
BF01	<p><b>Develop and implement measures to avoid and manage ignition of fires during construction</b></p> <p>Prior to commencement of project works, develop a bushfire protocol as part of the CEMP to:</p> <ul style="list-style-type: none"> <li>➤ Avoid and minimise high risk activities on Total Fire Ban Days.</li> <li>➤ Maintain fuels to low levels within the sites prior to and during the bushfire danger periods.</li> <li>➤ Maintain vehicles, plant and machinery in accordance with specifications to prevent fire ignition from their operation.</li> <li>➤ Mitigate ignition risks from electrical faults.</li> <li>➤ Establish and maintain vehicle access to the site and surrounds for fire suppression activities by fire fighting authorities.</li> </ul>
BF02	<p><b>Provide onsite firefighting water capacity in high fire risk areas</b></p> <p>Prior to commencement of project works, develop a protocol for the provision of dedicated onsite water supply tanks or alternative water sources for firefighting in high fire risk areas. The protocol must include:</p> <ul style="list-style-type: none"> <li>➤ Provision of mobile water carts along the cable route to supplement emergency water supply for onsite personnel and emergency services.</li> <li>➤ For the fixed sites, use tank(s) that are non-combustible and incorporate appropriate fire fighting fittings, for emergency services to access the water supply.</li> <li>➤ Maintaining clear access to tanks or water sources for fire fighting vehicles.</li> <li>➤ Providing sufficient water capacity to undertake adequate fire suppression.</li> <li>➤ Provision of trained personnel and equipment.</li> </ul> <p>High fire risk areas are areas in the natural landscape that are located in both a Bushfire Prone Area and/or the Bushfire Management Overlay.</p> <p>This protocol should be referenced in the Emergency Response Plan.</p>
BF03	<p><b>Prepare and implement a Bushfire Emergency Management Plan (BEMP)</b></p> <p>As a subplan to the project’s Emergency Response Plan, prepare and implement a BEMP that includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>➤ Description of the site facility</li> <li>➤ Provide details of all emergency procedures</li> <li>➤ Emergency preparedness arrangements</li> <li>➤ Details of all shelter in place and offsite evacuation procedures</li> </ul>

**EPR ID**
**Environmental Performance Requirements**

BF04

**Develop and implement measures to avoid and manage ignition risks during operation**

Develop and implement a protocol for:

- Avoiding high risk activities on Total Fire Ban Days.
- Maintenance of converter station infrastructure.
- Maintenance of fire fighting systems and water tank capacity at the converter stations.
- Maintaining vehicle access to the site and surrounds for fire suppression activities by fire fighting authorities.
- Operation of electrical infrastructure to minimise ignition risk and maintain monitoring and management systems (emergencies, fault management, system monitoring, fire detection and suppression).
- Provision of trained personnel and equipment.

This protocol should be referenced in the Emergency Response Plan.

**Climate change**

CC01

**Implement measures to address the impacts of climate change on the project.**

Design the project to address potential impacts from climate change across the life of the project, considering:

- Increased ambient temperatures/soil temperatures/sea temperatures and their potential impact on the operation of high voltage infrastructure.
- Sea level rise and coastal erosion and its potential impact on accessibility, and function of coastal infrastructure.

The design must be informed by a risk assessment completed to identify climate change risks and management measures based on:

- AS/NZS ISO 31000:2018 Risk management – Principles and guidelines
- AS 5334-2013 Climate change adaptation for settlements and infrastructure – A risk-based approach
- IPCC 2012 Managing the risks of extreme events and disasters to advance climate change adaptation

Include measures in the CEMP and OEMP (as relevant) to address:

- Extreme or chronic weather events such as bushfires, heavy rainfall events and extreme wind speeds and their potential impact on safety of employees, accessibility, and operation of infrastructure.

**EPR ID**
**Environmental Performance Requirements**
**Contaminated land and acid sulfate soils**

CL01

**Inspect sites to avoid or remove buried waste and waste piles to manage impacts to the environment**

Prior to commencement of project works:

- Inspect properties to be directly disturbed that have a medium or high risk of contamination as identified in the EIS/EES Technical Appendix N: Contaminated Land and Acid Sulfate Soils, and have not been previously accessed to identify risk of potential contamination. The purpose of inspections is to identify areas of potential contamination including buried waste and waste piles to be sampled and tested.
- Where practicable, realign the cable route to avoid areas of identified wastes and/or potential contamination. Areas that cannot be avoided should be tested to confirm the presence of contamination as required by EPR CL02.

CL02

**Manage excavated soil, contaminated soils, removed wastes and potential risks to the environment due to contamination during construction**

Prior to commencement of project works, prepare a contaminated land management plan in consultation with EPA to manage excavated soils that includes:

- A procedure for completing a detailed site investigation (in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure (2013)* (including as a minimum scheduled B1 and B2) prior to any excavation of medium to high risk of being contaminated areas (as identified in the EIS/EES Technical Appendix N) to identify the location, types and extent of contamination.
- Measures for the management of all material generated from excavation or trenchless construction methods in accordance with the *Environment Protection Act 2017 (Vic)* (EP Act) and Environment Protection Regulations.
- Validation testing of soils beneath removed wastes and contaminated soils, and implement measures to remediate or dispose of contaminated soils that present a potential risk to human health and the environment.
- Handling, transport, storage and disposal of spoil, excavated or generated wastes in accordance with EM07 to protect human health and the environment.
- Management of hazardous substances, excavated soils and asbestos contaminated soils to minimise risks to human health and the environment.
- An unexpected finds protocol for contaminated land, acid sulfate soils, asbestos and odour management of excavated soils.
- Preventing contamination of soil, surface water and groundwater water during construction activities through:
  - Chemicals, fuels and hazardous materials being stored and handled onsite in a manner that prevent contamination and in accordance *Australian Standard AS1940 Storage and Handling of Flammable and Combustible Liquids* and with reference to EPA Victoria Publication 1698: *Liquid storage and handling guidelines*.
  - Contingency and emergency response procedures to handle fuel and chemical spills, including availability of on-site hydrocarbon spill kits.
- Document the requirements for the use, handling, storage, transportation and disposal of all substances to minimise the risk of pollution or harm and in accordance with the relevant legislation and guidelines to demonstrate compliance with the General Environmental Duty.

The contaminated land management plan must be a sub plan to the CEMP and implemented during construction.

**EPR ID**
**Environmental Performance Requirements**

CL03

**Develop and implement an acid sulfate soils management plan**

Prior to commencement of project works:

- Undertake site investigations to characterise potential acid sulfate soils (ASS) prior to construction to confirm the location and extent of potential ASS that could be disturbed by the project (including areas mapped as having a high-probability of containing ASS and areas of waterlogged soils).
- Develop an ASS management plan for locations where disturbance intersect potential ASS.

The ASS management plan must meet the requirements of *Industrial Waste Management Policy (Waste Acid Sulfate Soils)*, EPA Publication 655.1: *Acid Sulfate Soil and Rock* and the *Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils* (DSE,2010), and include:

- The location of potential ASS identified.
- Measures to prevent oxidation of ASS identified and acidification of groundwater wherever possible.
- Management of potential ASS to limit or treat acid generation.
- Identification of appropriate stockpile areas and management measures to prevent release of acid and odours to the environment including lining, covering and runoff collection.
- Identification of suitable sites for management, re-use or disposal of any ASS spoil that may be generated in accordance with EPA Victoria requirements.

The ASS management plan must be informed by the sub plan developed for EPR GW07 and approved by EPA Victoria.

The ASS management plan must be a sub plan to the CEMP and implemented during construction.

CL04

**Develop and implement measures to manage potential contamination impacts in operation**

As part of the OEMP, develop and implement measures to avoid causing contamination during the operation of the project. The measures should:

- Comply with Australian Standard *AS1940 Storage Handling of Flammable and Combustible Liquids*.
- Address requirements of EPA Victoria Publication 1834.1 *Civil construction, building and demolition guide*.
- Address requirements of EPA Victoria Publication 1698 *Liquid Storage and Handling Guidelines*.

**EPR ID      Environmental Performance Requirements**

**Electromagnetic fields**

**EMF01      Design the project to reduce EMF/EMI emissions**

Design and construct the project to reduce electric and magnetic fields (EMF) and electromagnetic interference (EMI) for the project alignment onshore to below the reference levels or as low as reasonably practicable to avoid and minimise impacts. The applicable reference levels are defined in EIS/EES Technical Appendix A: Electromagnetic Fields Section 7 of the EMI impact assessment prepared for the EIS/EES.

The design must be informed by a project wide EMF and EMI assessment for all the proposed infrastructure, identifying existing sensitive receptors and committed future developments within the study area. The assessment must be documented in a management plan that includes, but is not limited to:

- Outcomes of the project wide EMF and EMI assessment and details of the areas assessed.
- The location of all sensitive receptors including beehives within 5 m of the infrastructure. The location of beehives must also be documented in the property management plans (EPR A02).
- Where at-receiver mitigation works to sensitive equipment are required to avoid or minimise adverse impacts.
- A pre- and post-construction testing strategy to verify design calculations, impacts on sensitive equipment and the efficacy of any specified mitigation measures.
- Remedial action to be undertaken if EMF and EMI limits are not met during the construction, testing, and commissioning.

The EMF and EMI management plan must be prepared to inform the design and commissioning of the project.

EMF and EMI emissions of the subsea cable are addressed in EPR MERU 12.

**EMF02      Investigate and resolve complaints regarding EMF and EMI during operation**

As part of the OEMP, develop a protocol for investigating and resolving complaints regarding EMF and EMI during operation. The protocol must outline requirements for working with landholders to assess impacts on sensitive equipment and implement reasonably practicable measures to address impacts.

**Geomorphology and soils**

**GM01      Assess ground conditions and landslide risks to inform design and construction methods**

Prior to commencement of project works, complete surveys and site assessments along the project alignment, converter station, shore crossing and transition station to assess ground conditions to inform the design and site specific construction methods for the project components including above ground infrastructure, buildings, access roads, underground cables, joint bays, and laydown areas.

The surveys and site assessments must be undertaken by a suitably qualified person and include, but not limited to:

- Seismic assessment to assess seismic hazards.
- Geotechnical testing to confirm geological conditions.
- Groundwater levels.
- Landslide risk assessment.

**EPR ID**
**Environmental Performance Requirements**

GM02

**Develop designs that minimise construction induced ground movement**

Prior to commencement of project works, develop a design for below and above ground infrastructure that:

- ✓ Addresses areas of high landslide risk identified in EPR GM01 and implement design measures to reduce landslip risks to tolerable levels in accordance with Australian Geomechanics Society landslide management guidelines:
  - *Landslide Risk Management Concepts and Guidelines* (AGS 2000)
  - *Guideline for Landslide Susceptibility, Hazard and Risk Zoning for Land Use Planning* (AGS 2007)
  - *Commentary on Guideline for Landslide Susceptibility, Hazard and Risk Zoning for Land Use Planning* (AGS 2007)
  - *Practice Note Guidelines for Landslide Risk Management* (AGS 2007)
  - *Commentary on Practice Note Guidelines for Landslide Risk Management* (AGS 2007)
  - *The Australian GeoGuides for Slope Management and Maintenance* (AGS 2007)
- ✓ Includes measures to stabilise construction areas using appropriate engineering techniques in particular where cuts and fills are required.
- ✓ Responds to local soil and groundwater conditions including the potential for reactive soils such as in weathered volcanics and alluvial sediments and other clay rich soils.
- ✓ Considers induced settlement through subsidence resulting from groundwater drawdown through construction.
- ✓ Allows for ground movements (both lateral and vertical) within the design of cable joints and couplings, and any surface infrastructure.

Where landslide risks cannot be addressed through design controls, the project alignment must be amended to reduce landslide risks to a tolerable level.

GM03

**Develop designs that minimise ground disturbance due to vegetation removal and disturbance of acid sulfate soils**

Prior to commencement of project works, develop designs for below and above ground infrastructure that:

- ✓ Are informed by investigations required in EPR GM01.
- ✓ Includes measures to ensure ground disturbance is kept to a minimum following vegetation clearance.
- ✓ Minimises disturbance of ASS as outlined in EPR CL03.

EPR ID	Environmental Performance Requirements
GM04	<p><b>Undertake construction excavations in accordance with Australian Standards and informed by geotechnical investigations</b></p> <p>Prior to commencement of project works, develop methods that:</p> <ul style="list-style-type: none"> <li>➤ Are in accordance with AS 3798-2007 Guidelines on earthworks for commercial and residential developments, and the Best Practice Erosion and Sediment Control Guidelines (IECA 2008).</li> <li>➤ Ensure all trenches are backfilled with suitable engineering materials to an appropriate design compaction standard to ensure long term trench and slope stability.</li> <li>➤ Include cut and fill batter angles that are commensurate with long term engineering designs.</li> <li>➤ Include measures for treating exposed faces in a manner to limit erosion and promote longer term vegetation growth.</li> <li>➤ Minimise the duration of open trenches in landscapes susceptible to movement.</li> <li>➤ Utilise excavation equipment that is suitable for the geological conditions and able to efficiently construct the proposed trench profile.</li> <li>➤ Include a program for inspections of excavations during construction.</li> </ul> <p>These measures must be documented in a sub plan to the CEMP and implemented during construction.</p>
GM05	<p><b>Develop and implement methods for trenchless construction (HDD) that have considered ground conditions</b></p> <p>Prior to commencement of project works, develop measures where trenchless construction methods will be implemented that addresses site conditions as determined through the assessments completed to comply with EPR GM01.</p> <p>These methods must be specific to the location, geology, terrain and surrounding landscape stability.</p> <p>These measures must be documented in a sub plan to the CEMP and implemented during construction.</p>
GM06	<p><b>Develop and implement methods to provide trench stability during construction</b></p> <p>Prior to commencement of project works, develop measures that provide trench stability and consider factors such as, but not limited to:</p> <ul style="list-style-type: none"> <li>➤ Measures that support the stability of the surrounding landscape to maintain lateral support.</li> <li>➤ Measures to support trench walls and prevent collapse in all ground conditions including unconsolidated and soft soils such as a result of presence of marine deposits, alluvial sediments and weathered, saturated basalts.</li> <li>➤ Methods to manage trench dewatering, where it is required, to avoid and/or minimise scouring and erosion.</li> <li>➤ Avoiding surface water from entering the trench during and after construction, and if not possible to avoid, install appropriate drainage with managed outlets.</li> <li>➤ Minimise the duration that trenches are kept open.</li> </ul> <p>These measures must be documented in a sub plan to the CEMP and implemented during construction.</p>

**EPR ID**
**Environmental Performance Requirements**

GM07

**Develop and implement methods to provide slope stability during trenching**

Prior to commencement of project works, develop measures that ensure stability on slopes and consider factors such as, but not limited to:

- Avoid and minimise water being dammed in trenches which could then induce saturated slopes and initiate instability.
- Avoid placement of spoil from trenches next to a trench on moderate to steep slopes to reduce impact on slope instability.
- Implement measures so that the trench and the slope above is fully supported and the upslope is not undermined and initiates failures.
- Minimise the duration that trenches are kept open.
- Wherever possible, sequence trenching to work down the slope rather than up the slope to avoid undermining moderate to steep slopes from below.
- Includes measures to ensure slope stability above and below the trench following vegetation clearance.

These measures must be documented in a sub plan to the CEMP and implemented during construction.

GM08

**Develop and implement a site drainage plan to minimise site run off and avoid and/or minimise impacts to ground and slope stability**

Prior to commencement of project works, develop measures to avoid and minimise impacts to ground and slope stability. The plan must document measures and where they will be applied to address:

- The provision of drainage for any area of disturbed ground and construction of level areas.
- Existing gullies or areas susceptible to gullying by avoiding the concentration of water flows into susceptible areas.
- Avoid creating closed depressions so as to avoid ponding of runoff.

These measures must be documented in a sub plan to the CEMP and implemented during construction.

GM09

**Develop and implement a watercourse crossing plan to avoid and/or minimise impacts to existing fluvial geomorphology**

Prior to commencement of project works, develop a plan for watercourse crossings that documents the measures and where they will be applied to avoid and minimise impacts to fluvial geomorphology. The plan should address:

- Management of trenching across watercourses to avoid major damming and channel incision of watercourses.
- Adopting trenchless construction methods for all significant watercourses.

These measures must be documented in a sub plan to the CEMP and implemented during construction.



EPR ID	Environmental Performance Requirements
<b>Greenhouse gas emissions</b>	
GHG01	<p data-bbox="387 360 987 384"><b>Minimise greenhouse gas emissions in construction</b></p> <p data-bbox="387 405 2078 461">Prior to commencement of project works, identify opportunities to reduce Scope 1 and Scope 2 greenhouse gas emissions (as defined in the NGER Act), so far as reasonably practicable. Measures must be consistent with the Marinus Link Sustainability Framework and include consideration of:</p> <ul data-bbox="387 469 887 692" style="list-style-type: none"> <li data-bbox="387 469 707 493">/ Use of low emission fuels</li> <li data-bbox="387 501 860 525">/ Maintenance of equipment and vehicles</li> <li data-bbox="387 533 779 557">/ Minimising vegetation clearance</li> <li data-bbox="387 564 714 588">/ Purchase of green energy</li> <li data-bbox="387 596 887 620">/ Procurement of energy efficient machinery</li> <li data-bbox="387 628 831 652">/ Use of low carbon emission concrete</li> <li data-bbox="387 660 707 684">/ Use of recycled materials</li> </ul> <p data-bbox="387 708 1339 732">The design must include measures to avoid SF<sub>6</sub> leakage so far as reasonably practicable.</p> <p data-bbox="387 756 1594 780">Scope 1 and Scope 2 GHG emissions during construction must be reported annually on the Marinus Link website.</p>

GHG02	<p data-bbox="387 831 831 855"><b>Report on GHG emissions in operation</b></p> <p data-bbox="387 876 2078 932">Prior to commencement of operation, identify opportunities to reduce operational Scope 1 and Scope 2 greenhouse gas emissions (as defined in the NGER Act) so far as reasonably practicable. Measures must be consistent with the Marinus Link Sustainability Framework and include consideration of:</p> <ul data-bbox="387 940 2029 1179" style="list-style-type: none"> <li data-bbox="387 940 2029 1043">/ Management and maintenance of SF<sub>6</sub> insulated equipment in accordance with Australian Standard IEC 62271.4: 2015 – high-voltage switchgear and controlgear – Part 4: Handling procedures for sulphur hexafluoride (SF<sub>6</sub>) and its mixtures and the Energy Network Australia Industry Guideline for SF<sub>6</sub> Management (Document 022-2008) and prevention of release of SF<sub>6</sub> by using a closed cycle during installation, maintenance and decommissioning of equipment where practicable.</li> <li data-bbox="387 1051 707 1075">/ Use of low emission fuels.</li> <li data-bbox="387 1083 860 1107">/ Maintenance of equipment and vehicles.</li> <li data-bbox="387 1115 714 1139">/ Purchase of green energy.</li> <li data-bbox="387 1147 887 1171">/ Procurement of energy efficient machinery.</li> </ul> <p data-bbox="387 1195 1485 1219">Scope 1 and Scope 2 emissions from operation must be reported annually on the Marinus Link website.</p>
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EPR ID	Environmental Performance Requirements
<b>Groundwater</b>	
GW01	<p><b>Complete a hydrogeological assessment and dewatering drawdown assessment to inform the design</b></p> <p>Prior to commencement of project works, complete a hydrogeological assessment at locations identified along the final project alignment as likely to encounter groundwater during construction to refine the predicted groundwater drawdown levels identified and assessed in EIS/EES Technical Appendix P: Groundwater Assessment.</p> <p>The assessment must:</p> <ul style="list-style-type: none"> <li>➤ Be completed by a suitably qualified hydrogeologist.</li> <li>➤ Consider the assumptions and approach outlined in the EIS/EES Technical Appendix P.</li> <li>➤ Be informed by hydrogeological investigations including groundwater level and quality monitoring, and aquifer hydraulic testing.</li> <li>➤ Be informed by geotechnical investigations where available.</li> <li>➤ Be informed by representative aquifer hydraulic conditions (such as from aquifer hydraulic tests completed on-site) in areas of shallow groundwater and use relevant, available monitoring data.</li> <li>➤ Include a groundwater drawdown assessment for areas where dewatering of construction trenches will be required based on the detailed design.</li> <li>➤ Incorporate groundwater quality analysis undertaken to assess for the presence of unexpected, existing groundwater contamination.</li> </ul> <p>The assessment must be documented as part of the groundwater management plan as a sub plan to the CEMP and implemented during construction.</p>
GW02	<p><b>Develop and implement methods to minimise groundwater inflow into trenches and groundwater level drawdown</b></p> <p>Prior to commencement of project works, develop methods that identify and either avoid (where possible) or minimise groundwater inflow into cable trenches and joint pits. The construction method should:</p> <ul style="list-style-type: none"> <li>➤ Be informed by the hydrogeological assessment completed for EPR GW01.</li> <li>➤ Include measures to minimise groundwater drawdown where impacts may occur to groundwater quality, productive uses or the function of GDEs.</li> <li>➤ Consider scheduling construction works to minimise the total time that dewatering is required.</li> <li>➤ Adopt engineering controls during construction such as sheet pile walls or other temporary structures to avoid (where possible) or minimise groundwater ingress to construction trenches at locations where: <ul style="list-style-type: none"> <li>○ High groundwater inflows are predicted to be encountered.</li> <li>○ The hydrogeological assessment (EPR GW01) identifies potential impacts to groundwater that may be more significant than assessed the EIS/EES Technical Appendix P.</li> </ul> </li> </ul> <p>These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.</p>

**EPR ID      Environmental Performance Requirements**

**GW03      Develop and implement methods for HDD and drilling to prevent groundwater movement and contamination**

Prior to commencement of project works, develop methods to identify and avoid or minimise impacts to groundwater that:

- Seal the annulus of directionally drilled bores or otherwise prevent water movement along the borehole annulus.
- Adopt relevant guidance from *Minimum construction requirements for water bores in Australia* (2020) to minimise potential for impacts to groundwater.
- Utilise non-toxic and/or biodegradable drilling additives, such as bentonite clay and xanthan gum, for HDD and other drilling activities during construction.
- Are informed by investigations as required by EPR GW01.
- Are informed by geotechnical investigations or advice prior to commencing HDD activities.
- Include methods for HDD monitoring and mitigation measures to minimise potential for frac-outs to occur and limit the scale of impact in sensitive areas. These include minimum observations during drilling to detect frac-outs (such as loss of fluid circulation) and pressure relief methods. Emergency response measures for frac out during HDD are covered by EPR SW01.

These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.

**GW04      Develop and implement measures to utilise cable backfill material to minimise impact on groundwater recharge and flow**

Prior to commencement of project works, develop measures to backfill excavations with the same material that was excavated in approximately the same order so far as reasonably practicable, and having regard to EPR A03.

- The backfill should reinstate the soil profile with adequate compaction to avoid (where possible) or minimise surface water ingress to the trench, flow along the trench, and preferential recharge to groundwater, and allow for existing groundwater movement.
- Backfill below the water table should be informed by a hydrogeological assessment (EPR GW01).
- Where the existing material is not suitable for backfill and thermal backfill is required, the placement of thermal backfill and the construction design should be informed by the hydrogeological assessment (EPR GW01) to prevent barrier effects and allow groundwater pressure to equilibrate across the structure. Engineered solutions might include the design of under-drainage layers or other features that allow groundwater pressure to equilibrate across the structure.

These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.

EPR ID	Environmental Performance Requirements
GW05	<p><b>Design and implement measures to manage and dispose of extracted groundwater during construction to avoid (where possible) or minimise environmental impacts</b></p> <p>Prior to commencement of project works, develop measures to manage, monitor, reuse where possible, treat where necessary, and dispose of groundwater inflows during construction dewatering that identify and avoid or minimise potential impacts to groundwater values and conditions.</p> <p>The measures must be developed in consultation with relevant water authorities and EPA Victoria, and comply with relevant legislation and guidelines, including but not limited to:</p> <ul style="list-style-type: none"> <li>➤ EP Act and Environment Protection Regulations 2021.</li> <li>➤ Environment Reference Standard.</li> <li>➤ Water Industry Regulations 2006.</li> <li>➤ <i>Occupational Health and Safety Act 2004</i> (Vic) and Occupational Health and Safety Regulations 2017.</li> <li>➤ The waste management hierarchy.</li> </ul> <p>The measures must be documented in a plan that also outlines the approach to:</p> <ul style="list-style-type: none"> <li>➤ Avoiding or minimising wastewater production from dewatering groundwater, consistent with EPR GW02</li> <li>➤ Monitoring of groundwater levels and quality where dewatering may occur.</li> <li>➤ Management of extracted groundwater including collection methods, quality monitoring methods during disposal, discharge criteria and trigger levels developed in consultation with relevant regulators, proposed treatment methods, and disposal processes.</li> <li>➤ Groundwater disposal options and individual discharge locations including estimated discharge volumes and flow rates, discharge limits for water quality and flow rates, anticipated potential water treatment requirements and any required approvals, monitoring and reporting.</li> </ul> <p>These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.</p>

**EPR ID**
**Environmental Performance Requirements**

GW06

**Undertake groundwater monitoring to establish baseline groundwater conditions prior to construction and monitor groundwater levels and quality in areas of higher potential impact during construction**

Prior to commencement of project works, develop a groundwater monitoring program to establish background and baseline groundwater conditions to the extent reasonably practicable. The baseline and background level and quality data will be used to identify if there are any changes in groundwater during construction. The program must focus on areas where higher impacts to environmental values may occur and include, but not be limited to, the project alignment area adjacent to Hazelwood cooling pond, Waratah Bay, groundwater dependent ecosystems and areas of potential ASS.

The monitoring program must:

- Be developed in consultation with EPA Victoria to confirm the extent and duration of monitoring required prior to, during and post construction.
- Establish seasonal variability and other long-term trends of groundwater conditions.
- Establish baseline groundwater levels and quality conditions in areas where shallow groundwater is expected to be encountered and is susceptible to groundwater quality, flow and drawdown impacts, as identified in EPR GW01.
- Calibrate the groundwater drawdown assessment prior to commencement of project works and during construction activities to verify predictions.
- Verify the adequacy of the proposed design and construction methods, and where required, identify and implement any additional measures required to mitigate impacts from changes in groundwater levels, flow and quality.
- Be informed by the outcomes of the hydrogeological assessment (EPR GW01) and acid sulfate soil assessment (EPR GW07).
- Outline the approach to review of monitoring results and define acceptability criteria for groundwater recovery at completion of construction for water quality, flows and level recovery as predicted by the groundwater drawdown assessment required in EPR GW01 and considering the impacted groundwater values. Where recovery may extend into operation, relevant groundwater monitoring activities should be incorporated into the OEMP (EPR GW09)

The monitoring program, where required, must be consistent with the obligations of the EP Act, EPA Victoria Publication 668 *Hydrogeological assessment groundwater quality guidelines*, EPA Victoria Publication 669 *Groundwater Sampling Guidelines*, EPA Victoria Publication 2033 *Background levels methodology guidance* and the Environment Reference Standard.

This program must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.

EPR ID	Environmental Performance Requirements
GW07	<p><b>Develop and implement measures to prevent groundwater acidification, saline intrusion and contaminant mobilisation in areas where they are predicted to occur</b></p> <p>Prior to commencement of project works, develop measures to prevent groundwater acidification within the zone of groundwater drawdown and in the coastal area. The measures must:</p> <ul style="list-style-type: none"> <li>➤ Be informed by the ASS management plan (EPR CL03) that will identify locations where ASS could occur.</li> <li>➤ Be based on the findings of the hydrogeological assessment EPR GW01 and groundwater monitoring EPR GW06.</li> <li>➤ Adopt appropriate engineering controls, such as sheet pile walls or other barriers, to prevent groundwater level drawdown, so far as reasonably practicable or adopt other mitigations or management measures to prevent groundwater acidification impacts.</li> </ul> <p>Develop and implement measures to:</p> <ul style="list-style-type: none"> <li>➤ Prevent saline water intrusion into freshwater aquifers where potential impacts to groundwater quality are predicted to occur as a result of dewatering in the coastal zone. Measures should be developed based on the outcome of the hydrogeological assessment (EPR GW01) and prior to the commencement of works.</li> <li>➤ Prevent the mobilisation of known, existing groundwater contamination, as identified in EPR GW01, that would increase the risk posed to groundwater receptors or cause degraded groundwater quality.</li> </ul> <p>Groundwater monitoring must be carried out during construction to verify groundwater acidification, saline intrusion and mobilisation of contamination is not occurring and responses are implemented if quality impacts are detected.</p> <p>The measures must be documented in a sub plan endorsed by a person(s) appointed by EPA Victoria as an environmental auditor. These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.</p>

GW08	<p><b>Develop and implement measures to maintain water supply to registered groundwater users</b></p> <ul style="list-style-type: none"> <li>➤ Confirm the status and use of registered and unregistered bores within the immediate construction zone by making inquiries with affected landholders and estimate the drawdown area due to construction.</li> <li>➤ Where necessary, negotiate requirements to decommission existing bores where they may be destroyed during construction, and/or negotiate the need for replacement with new bores or the provision of an alternative water supply.</li> <li>➤ Where dewatering reduces access to groundwater for landholders, negotiate arrangements to provide alternative water supplies until groundwater levels return to enable supply of water.</li> <li>➤ Bore decommissioning must be completed in accordance with the <i>Minimum Construction Requirements for Water Bores in Australia</i>.</li> </ul> <p>These measures must be documented in a groundwater management plan as a sub plan to the CEMP and implemented during construction.</p>
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**EPR ID      Environmental Performance Requirements**

**GW09      Develop and implement measures to manage potential impacts to groundwater in operation**

As part of the OEMP, develop and implement measures to identify and avoid (where possible) or minimise potential impacts to groundwater during the operation of the project as identified by the EIS/EES Technical Appendix P or by assessment of impacts from the proposed operation and maintenance activities. The OEMP must also include measures to manage any residual impacts to groundwater from construction that need to be managed in operation.

The measures must address:

- Ongoing monitoring requirements as determined through the monitoring program developed in accordance with EPR GW06, including monitoring to confirm recovery of groundwater levels and quality, where required.
- Management of materials to prevent contamination of groundwater, as required by EPR CL04.

The groundwater management plan must be a sub plan to the OEMP and implemented during operation.

**Land use and planning**

**LUP01      Minimise land use impacts through design**

Design the project to minimise the footprint and avoid, so far as reasonably practicable, impacts on the following land uses:

- Agricultural, rural industry, and forestry properties
- Townships and rural residential properties
- Native vegetation, state parks and nature reserves
- Significant landscapes
- Other sensitive land uses such as tourism facilities and community recreational areas.
- Crossing of other major services and utilities where possible.

Prior to submission of Alignment Plans, identify any material changes to relevant strategic land use plans and planning policies that provide for current and future land use in the project area and that have occurred after planning approval for the project, and consider whether the Alignment Plans can respond to any such change.

**LUP02      Minimise disruption due to property and easement acquisition**

Design the project to minimise property and easement acquisition where reasonably practicable and to provide for safe asset operation and maintenance.

Engage with affected landholders to, where reasonably practicable, negotiate property and easement acquisition, and the terms of ongoing access arrangements to minimise impact on existing land uses, access, and amenity.

**EPR ID      Environmental Performance Requirements**

**LUP03      Minimise land use impacts during and post construction**

Prior to commencement of project works, develop a plan to:

- Minimise the construction footprint and any temporary land use impacts due to construction activities where reasonably practicable.
- Undertake construction to minimise disturbance to ongoing use of land for existing purposes.
- Reinstate land and access following construction to pre-construction conditions to enable existing land uses to resume, unless otherwise agreed with landholders (EPR A04).

**LUP04      Avoid and minimise impact on services and utilities**

Prior to commencement of project works by each principal contractor, consult with asset owners and managers with the objective to:

- Agree requirements when construction is proximate to other services, particularly high voltage powerlines and high-pressure gas lines.
- Design requirements for crossing of other assets and services.
- Minimise disruption to localised services and reinstate interrupted services as required. Where services are planned to be disrupted, advance notification must be provided to service users.

**Landscape and visual**

**LV01      Design converter station buildings to minimise visual impacts from public locations**

During the design of the converter station buildings, incorporate design outcomes to reduce the visual prominence of the buildings in views from the public roads. Design of the building facades will be documented in a Development Plan(s) and may include, but not be limited to:

- Tapering of leading edges of the building and roofline.
- Articulation of building facades.
- Using colours such as dark greens, reflecting existing vegetation, or muted tones minimises contrast and prominence.

**LV02      Implement measures to establish and maintain a vegetative screen for public views of above ground components**

During the design of the converter station and transition station, develop measures to ensure a vegetative screen is established to shield views from public roads. Strategies to achieve this may include, but not be limited to:

- Ensuring sufficient setbacks along the road frontages.
- Layered landscaping using endemic species.



**EPR ID      Environmental Performance Requirements**

**LV03      Design transition station to minimise visual impacts from public locations**

During the design of the transition station, develop measures to provide screening from Waratah Road that is similar to, or better than that which is provided by existing vegetation and landforms. Strategies to achieve this may include, but not be limited to:

- Retaining existing vegetation within the site.
- Including vegetation or landscaping within the site boundaries to screen or filter views of project features using endemic species.
- Locating perimeter fencing behind landscape plantings or landforms.

**LV04      Develop and implement measures to manage potential visual impacts in operation**

As part of the OEMP, develop and implement measures to minimise visual impacts during the operation. The measures should address:

- Monitoring vegetation screening and landscaping with site boundaries for at least two years ensuring establishment and long term viability of landscaping.
- Replacement of any failed vegetation screens or landscaping with endemic species.

**Marine ecology and resource use**

**MERU01      Monitor HDD activities for the shore crossing to avoid or minimise impacts to the marine environment**

Prior to commencement of marine construction develop procedures for:

- Monitoring HDD activities and drilling fluid pressures to minimise release of drilling fluid to the marine environment.
- Extracting cuttings and drilling fluids from the HDD pilot boreholes for the shore crossing prior to breaking through to the sea floor.

These procedures must be documented in a sub plan to the CEMP and implemented during construction.

**MERU02      Placement of final subsea project alignment to avoid or minimise impacts on benthic habitats**

The subsea project alignment, should be located, to the extent reasonably practicable:

- Within the sand-filled paleochannels and gutters in nearshore Tasmania and within the sandy seabed of Waratah Bay, in nearshore Victoria.
- Away from nearshore areas of higher biological productivity (e.g., low- and high-profile reefs).
- To avoid obstacles such as rocks and relocated to areas of soft-sediment seabed.
- The final subsea project alignment must be informed by geophysical surveys and geotechnical investigations, and seabed sampling.

**MERU03      Undertake a pre-lay survey prior to subsea cable installation to minimise seabed disturbance**

Prior to commencement of subsea cable installation, undertake a pre-lay survey to inform the final subsea project alignment so that it is clear of obstacles to the extent reasonably practicable, including low-profile reefs.

EPR ID	Environmental Performance Requirements
MERU04	<p><b>Minimise impacts from disturbing contaminated sediments around the disused tiioxide pipeline</b></p> <p>Prior to commencement of marine construction that could disturb contaminated sediments associated with the disused tiioxide pipeline of the former tiioxide factory at Heybridge, Tasmania, measures must be developed and documented in a sub-plan the CEMP to manage the release of contaminated sediments during construction activities (e.g., wet jetting operations) in the paleochannels and gutters in the Tasmanian nearshore and offshore waters. These measures should also manage the release of surface sediment contaminants if the tiioxide pipeline, currently exposed and resting on the seabed, is to be removed, cut or collapsed during construction.</p>
MERU05	<p><b>Develop and implement a cable crossing management plan</b></p> <p>Prior to commencement of marine construction, develop a cable crossing management plan with measures to avoid impacts on existing third-party subsea cables during construction. The cable crossing management plan must:</p> <ul style="list-style-type: none"> <li>➤ Be developed through consultation with the owner of the Bass Strait 1 cable crossed by the project.</li> <li>➤ Be developed through consultation with the owner of the Indigo Central cable crossed by the project.</li> <li>➤ Describe the approach and key requirements for safe cable crossing.</li> <li>➤ Includes an engineering solution for the crossing with relevant infrastructure owners.</li> <li>➤ Includes requirements for informing the Australian Maritime Safety Authority (AMSA) of the location, timing and duration of cable crossing works.</li> <li>➤ Be informed by guidelines published by the International Cable Protection Committee to assist the cable industry to adopt a harmonised approach in relation to crossings (ICPC 2023b).</li> <li>➤ Document the crossing point locations for the subsea cables, and the distances that the jet trencher will stop before crossing existing third-party subsea cable.</li> <li>➤ Outline the notification protocols for informing Bass Strait 1 and Indigo Central cable owners of the final design and construction approach.</li> </ul> <p>The plan must be implemented during construction.</p>
MERU06	<p><b>Develop and implement a marine communication plan</b></p> <p>Prior to commencement of marine construction, develop and implement a marine communication plan that includes:</p> <ul style="list-style-type: none"> <li>➤ Identification of relevant stakeholders.</li> <li>➤ Protocol for notifying the AMSA of the proposed locations, timing and duration of proposed marine construction activities.</li> <li>➤ The approach for compliance with <i>AMSA Marine Orders Part 30 (Prevention of Collisions)</i>, <i>AMSA Marine Orders Part 59 (Offshore Support Vessel Operations)</i> and the convention on the <i>International Regulations for Preventing Collisions at Sea, 1972</i> (COLREGs).</li> <li>➤ Protocol for informing the Australian Hydrographic Office of the locations, dates, times and duration of proposed marine construction activities.</li> <li>➤ A plan to engage with commercial and recreational fisheries on the project activities, schedule, locations and durations.</li> <li>➤ The approach for using guard vessels to enforce the temporary exclusion zone during cable laying across Bass Strait and at the shore crossings.</li> <li>➤ The approach for informing recreational users of marine activities, in accordance with the Community and Stakeholder Engagement Plan (EPR S03).</li> </ul> <p>This plan must be implemented during construction.</p>

**EPR ID**
**Environmental Performance Requirements**

MERU07

**Develop and implement a marine fauna management plan**

Prior to commencement of marine construction, develop a marine fauna management plan to avoid or minimise impacts to marine fauna. The management plan should outline the approach to:

- Managing interactions with marine fauna where there is not a specific species management plan required under EPR MERU08 and MERU09.
- Reporting and collation of information about siting of and interactions with marine fauna, including those covered by species specific management plans.
- Protocols for incident management and reporting.
- Protocols for managing injured seabird or coastal bird if discovered on a lit vessel.
- Include species specific management plans as sub-plans.

The measures in the plan must be consistent with the objectives of relevant EPBC Act recovery plans including:

- *Recovery Plan for Marine Turtles in Australia* (DoEE 2017c)
- *National Recovery Plan for threatened Albatrosses and Giant Petrels 2011-2016* (DSEWPaC 2011c)
- *Recovery Plan for the White Shark (Carcharodon carcharias)* (DSEWPaC 2013a)
- *Sub-Antarctic Fur Seal and Southern Elephant Seal Recovery Plan* (DEH 2004)
- *Recovery Plan for the Australian Sea Lion (Neophoca cinerea)* (DSEWPaC 2013b)

The marine fauna management plan must be implemented during construction.

MERU08

**Develop and implement a cetacean interaction management plan**

Prior to commencement of marine construction, develop cetacean interaction management plan to avoid or minimise impacts to cetaceans during construction. The cetacean interaction management plan must:

- Be developed in accordance with relevant guidelines including:
  - *EPBC Act Policy Statement 2.1 – Interaction between Offshore Seismic Exploration and Whales: Industry Guidelines* (DEWHA 2008e)
  - *Wildlife (Marine Mammals) Regulations 2019*
  - *A guide to boating and swimming around whales, dolphins and seals* (DELWP 2022)
  - *Wildlife Management. Whale and dolphin viewing guidelines* (DNRE 2019)
- Define the area for visual monitoring for cetaceans that is appropriate for cable laying works.
- Define precaution zones for maintaining a separation distance of cable laying works from cetacean and the distance at which works should be suspended when cetaceans approach.
- Outline vessel-cetacean strike avoidance measures to minimise the potential for collision.
- Include a procedure for marine mammal observations which may include the role of Marine Mammal Observers (MMOs) on construction vessels at or around active construction locations.

The measures under the plan should be consistent with the goals of the EPBC Act *Conservation Management Plan for the Blue Whale* (DoE 2015a) and *Conservation Management Plan for the Southern Right Whale* (DSEWPaC 2012).

**EPR ID Environmental Performance Requirements**

The cetacean interaction management plan should be a sub-plan to the marine fauna management plan (EPR MERU07) and be implemented during construction.

**MERU09 Develop and implement a plan for managing interactions with sea turtles**

Prior to commencement of marine construction, develop a sea turtle interaction management plan for managing interactions with sea turtles to avoid or minimise impacts during construction. The plan must:

- Define the area for visual monitoring.
- Document the approach to vessel based visual monitoring with a minimum visual monitoring buffer zone of 200 m.
- Define exclusion and buffer zones for maintaining a separation distance of vessels from sea turtles, including the requirement for transiting vessels to maintain a minimum separation distance of 50 m from sea turtles.
- Outline vessel-sea turtle strike avoidance measures to minimise the potential for collision with sea turtles, including if sea turtles are sighted within the 50 m separation distance, vessels must reduce speed and shift the engine to neutral, not engaging the engines until sea turtles are clear of the area.
- Consider all construction vessels including guard vessels, small boats manoeuvring floated cables, crew transit vessels and dive boats. A plan is not required for slow moving vessels laying cable, towing gear or subsea machines.

The sea turtle interaction management plan should be a sub-plan to the marine fauna management plan (EPR MERU07) and be implemented during construction.

**MERU10 Develop and implement measures to minimise impacts on marine fauna and avifauna due to lighting**

Prior to commencement of marine construction, develop measures to minimise impacts on marine fauna due to artificial lighting for construction and operation. The measures must consider the following:

- Australia's *National Light Pollution Guidelines for Wildlife* (DoEE 2020), to manage the effect of artificial light on marine turtles, seabirds, and migratory shorebirds that are listed under the EPBC Act, species that are part of a listed ecological community, and species protected under state or territory legislation for which artificial light has been demonstrated to affect behaviour, survivorship, or reproduction.
- Australian Standard *AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting* and recognise the impact of artificial light on living organisms.
- EPBC Act *Policy Statement 3.21 - Industry Guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species* (DoEE 2017a).
- The measures must:
  - Minimise lighting where practicable and where safety is not compromised, minimise the number of lights, the intensity of lights, and the amount of time lights are turned on.
  - Direct lighting to where it is needed and avoid general area floodlighting.
  - Limit area and deck lighting to the amount and intensity necessary to maintain deck crew safety.
  - Direct lighting inboard and downward (where possible) to reduce the potential for seabird attraction.
  - Avoid direct lighting of the sea surface and minimise indirect lighting on the sea surface to the extent practicable.
  - Include routine inspection of lighted areas of the cable lay vessel and other night-time operating vessels for birds that may have been attracted.

The measures must be addressed in the marine fauna management plan (EPR MERU07) and be implemented during construction

MERU11

**Develop and implement a plan to avoid the introduction of invasive marine species**

Prior to commencement of marine construction, develop a ballast water management plan and biofouling management requirements for each marine vessel to avoid the introduction of marine pests via ballast water and biofouling of the vessels hull and semi-enclosed spaces.

**Compliance with ballast water management requirements**

During construction and operation vessel owners must comply with the:

- *Australian Ballast Water Management Requirements* (DAFF 2020)
- *Biosecurity Act 2015* (Cwlth)
- *International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004* (BWM Convention 2004)
- *Australian Anti-fouling and in-water cleaning guidelines* (DoA, DoE 2015)
- *Ballast Water Management Requirements* (DAFF 2020)
- Maritime and Aircraft Reporting System (MARS) and the Vessel Compliance Scheme (VCS):
  - Prepare and submit a Pre-arrival Report (PAR) for answering the ballast water questionnaire from DAFF.
  - Non-First Point of Entry (NFP) application v16.
  - Ballast Water (BW) report v108.

International marine traffic must have a ballast water management plan for water and sediments that includes:

- A ballast water record book.
- An International Ballast Water Management certificate where ships are 400 gross tonnes and above in accordance with the BWM Convention and specifies which standard the ship is complying with, as well as the date of expiry of the Certificate.
- Vessels with a ballast water management system must carry a type approval certificate specific to the type of ballast water management system installed
- Complete and accurate record of all ballast water movements.
- Detailed information regarding vessel maintenance history for treating biofouling.

**Compliance with biofouling management requirements**

During construction and operation vessel owners must comply with the:

- *Biosecurity Amendment (Biofouling Management) Regulations 2021* (Cwlth) that require operators of all vessels to provide information on biofouling management practices prior to arriving in Australia.
- *Australian Biofouling Management Requirements ('ABFMR')* (DAWE 2022) via:
  - Biofouling Management Plan
  - Biofouling Record Book.
  - Alternatively, clean all biofouling within 30 days prior to arriving in Australia and submit a cleaning report to DAFF.
- *Australian National Antifouling and In-water Cleaning Guidelines* (DoA, DoE 2015).

The ballast water management plans and biofouling management requirements must be implemented during construction and operation.

EPR ID	Environmental Performance Requirements
MERU12	<p><b>Adopting a HVDC cable design that minimises the electromagnetic fields and heat emitted from the subsea and land cable</b></p> <p>The cable and construction method must be designed to install and bury subsea cables in a manner that reduces the EMF emitted from the subsea cables at the seabed and overlying the water column. The cable design and installation must include:</p> <ul style="list-style-type: none"> <li>➤ Cable burial up to 1.5 metres.</li> <li>➤ Bundling the HVDC cables in each subsea circuit to cancel out or greatly reduce EMF.</li> <li>➤ Separating each subsea circuit to reduce interaction of electromagnetic fields.</li> </ul>
MERU13	<p><b>Notification of the final subsea project alignment</b></p> <p>At the completion of marine construction, MLPL must inform the Australian Hydrographic Office and the Victorian Department of Energy, Environment and Climate Action of the locations and coordinates of the final subsea project alignment to enable the Australian Hydrographic Office to publish Notices to Mariners to inform maritime users of the presence of seabed power cables and mark them on navigation charts.</p>
<b>Terrestrial noise and vibration</b>	
NV01	<p><b>Conduct additional background noise monitoring</b></p> <p>Prior to commencement of project works, conduct additional background noise monitoring for onshore receivers in the vicinity of the following project components:</p> <ul style="list-style-type: none"> <li>➤ Shore crossing.</li> <li>➤ Construction locations where unavoidable works outside of normal working hours could occur for a period of five or more days.</li> <li>➤ Converter station.</li> <li>➤ Communications building and transition station (if required).</li> </ul> <p>The background noise monitoring data must:</p> <ul style="list-style-type: none"> <li>➤ Inform the assessment of construction noise (EPR NV02 and NV03) and operational noise (EPR NV04, NV05 and NV06).</li> <li>➤ Be conducted at a selection of locations which are representative of the receivers that could be impacted by construction of the project components listed above.</li> <li>➤ Be conducted at representative locations for the shore crossing in the townships of Sandy Point and Waratah Bay.</li> </ul> <p>The background noise monitoring and results analysis must be conducted in accordance with procedural guidance detailed in:</p> <ul style="list-style-type: none"> <li>➤ EPA Victoria Publication 1826.4 Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues (the EPA Noise Protocol),</li> <li>➤ EPA Victoria Publication 1834.1 Civil construction, building and demolition guide;</li> <li>➤ EPA Victoria Publication 1997 Technical guide: Measuring and analysing industry noise and music noise</li> <li>➤ Australian Standard 1055:2018 <i>Acoustics - Description and measurement of environmental noise</i> where relevant.</li> </ul>

**EPR ID**
**Environmental Performance Requirements**

Data must be collected and analysed in formats which are suitable for the distinct assessment requirements of the EPA Noise Protocol and EPA Publication 1834.1.

The results must be documented in a background noise report and made available to EPA Victoria on request.

**NV02**
**Develop and implement a construction noise and vibration management plan**

Prior to commencement of project works, develop a construction noise and vibration management plan in consultation with EPA Victoria for onshore construction including the shore crossing.

The construction noise and vibration management plan must describe the measures to be implemented during the onshore project works in Victoria to minimise the risk of harm from construction noise and vibration, so far as reasonably practicable, in accordance with the general environmental duty under the *Environmental Protection Act 2017* (Vic) (EP Act).

The plan must document:

- A description of all noise generating construction activities and their locations. This must include a schedule of equipment types and numbers for each activity and location.
- A description of the proposed construction program including timing and duration of construction activities. This must include confirmation that the works will adhere to normal working hours specified in EPA Victoria Publication 1834.1 *Civil construction, building and demolition guide*, other than unavoidable works, low-noise works, or managed-impact works, that must occur outside normal working hours.
- The results of additional background noise monitoring conducted under EPR NV01.
- Details of the location, duration and type of unavoidable works, which may need to occur outside of normal working hours and the protocols that will apply for the management of unavoidable works outside normal working hours. These protocols must include a process for the justification and approval of any unavoidable works, managed-impact works, or low noise impact works that may be planned to occur outside the normal working hours.
- The locations of the most sensitive working areas along the project alignment, including the extent of areas around unavoidable works where noise and vibration sensitive areas (receivers) need to be identified where risk controls for noise and vibration are most important, based on the predicted construction noise levels.
- A systematic evaluation of noise control options to minimise the risk of harm from operation noise so far as reasonably practicable.
- A framework for the selection and implementation of risk controls that are proportionate to the risk of harm from noise, informed by factors including the noise level, noise character, work timing, and work duration. The existing noise environment and the number of affected receivers may also be relevant factors at some sites.
- Details of all reasonable and practicable measures that are proposed to minimise the risk of harm as a result of noise and vibration associated with both on-site and off-site sources of construction activities (including heavy vehicle movements on local roads), including:
  - Requirement for the selection of major plant items with low noise emissions, characterised by sound power levels that are equivalent to, or lower than, the values/ranges indicated in AS 2436, *Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites (Reconfirmed 2016)*, unless it can be demonstrated that adhering to these values would not be reasonably practicable.
  - Measures for the control of potentially annoying characteristics such as tonality, impulsive and low frequency noise (accounting for frequency spectrum as a prescribed characteristic where applicable).
  - A requirement to each HDD rig associated with the shore crossing (including ancillary plant) to achieve a total sound power level of 110 dB LWA or lower, unless it can be demonstrated that adhering to this value would not be reasonably practicable or would increase the duration of exposure.

**EPR ID**
**Environmental Performance Requirements**

- Scheduling protocols for minimising the potential disruption caused by high noise levels as a result of transient construction activities which occur near to receivers for brief periods.
- Details of any locations where temporary screens or enclosures are identified as a reasonably practicable control measure, informed by updated construction noise modelling.
- ✓ Details of any low-noise or managed-impact works which may need to occur outside of normal working hours and the protocols that will apply to the management of these works outside of normal working hours.
- ✓ Requirements for monitoring noise and vibration of construction works, including unavoidable works.
- ✓ The protocol for preparing detailed noise and vibration impact assessments (EPR NV03) including when they are required, format, timing and process for review. The protocol must address all project works and specifically:
  - The shore crossing.
  - Locations where there is prolonged unavoidable works, managed-impact works, or low noise impact works outside of normal working hours.
  - The converter station.
- ✓ Vibration controls and monitoring requirements, including details of the locations and circumstances in which vibration noise monitoring would be conducted, for heritage structures including the cistern structure identified in Moores Road, Buffalo.
- ✓ Communication protocols for notifying landholders in advance of the works occurring.
- ✓ Noise complaint handling and response protocols, in accordance with the broader process for managing and responding to complaints received during construction (prepared under EPR S03).
- ✓ Protocols for continual improvement of the construction noise and vibration mitigation measures, informed by data sources including but not limited to audit findings, the community and stakeholder engagement framework (prepared under EPR S03), complaint reviews, noise modelling (e.g. as part of preparing detailed noise and vibration impact assessments under EPR NV03), and monitoring.

The construction noise and vibration management plan must address the requirements and guidance of:

- ✓ The general environmental duty under the EP Act.
- ✓ EPA Victoria Publication 1834.1.
- ✓ Australian Standard AS 2436 - 2010.
- ✓ EPA Victoria Publication 1996 *Noise guideline – assessing low frequency noise*

Both the construction noise and vibration management plan and the IEA review report of the plan must be made available to EPA Victoria on request.

The construction noise and vibration management plan must be a sub plan to the CEMP and implemented during construction.



**EPR ID**
**Environmental Performance Requirements**

NV03

**Develop a detailed noise and vibration impact assessment for construction activities at specific sites**

Prior to commencement of noise generating work that could impact onshore sensitive receivers, a detailed noise and vibration impact assessment must be completed for construction in accordance with the protocol contained in the construction noise and vibration management plan (EPR NV02):

Each assessment must:

- Identify all relevant sensitive locations (receivers).
- Determine the sound power level for all noise generating plant and equipment planned to be used for the activities being assessed.
- Include information to demonstrate the selection, or the processes for selection, of low noise equipment, including consideration of any potentially annoying characteristics of the noise such as tones, impulses or prominent low frequencies.
- Model predicted noise levels for the activities and plant being assessed.
- Assess noise and vibration impacts on sensitive receivers. This must include an objective assessment of the risk of low frequency noise, informed by indicative estimations of low frequency noise levels.
- Include a systematic evaluation of noise control options to minimise the risk of harm from construction noise and vibration so far as reasonably practicable. For unavoidable works outside of normal working hours, the noise control options evaluated should account for any feedback from consultations with the nearest affected receivers.
- Include details of all noise and vibration controls and management measures to be implemented to minimise the risk of harm from construction noise and vibration so far as reasonably practicable.
- Describe construction noise and vibration monitoring requirements, including verification noise testing (if warranted) to assess the effectiveness of the noise controls before commencing continuous unavoidable works outside of normal working hours.
- Include protocols for providing respite in circumstances where residents are affected by prolonged exposure to elevated noise levels as a result of unavoidable works out of hours.
- Comply with the controls and protocols documented in the construction noise and vibration management plan.

The detailed noise and vibration impact assessments must address the requirements and guidance of:

- The general environmental duty under *the Environmental Protection Act 2017* (Vic).
- *EPA Victoria Publication 1834.1 Civil construction, building and demolition guide*.
- Australian Standard AS 2436-2010 *Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites* (Reconfirmed 2016).
- EPA Victoria Publication 1996 *Noise guideline – assessing low frequency noise*.

Each detailed noise and vibration impact assessment must be reviewed by the independent environmental auditor (IEA), prior to commencement of the noise generating work under assessment. The detailed noise and vibration impact assessments and the IEA review reports must be made available to EPA Victoria on request.

All of the recommended noise and vibration risk controls (including mitigation, management, monitoring and respite measures) established in the detailed noise and vibration impact assessment must be implemented during construction.

NV04

**Design the converter station to minimise the risk of harm from noise so far as reasonably practicable**

In accordance with the general environmental duty under the *Environmental Protection Act (EP Act)*, the design process for the converter station must include a systematic evaluation of noise control options to minimise the risk of harm from operation noise so far as reasonably practicable. The evaluation must:

- Consider site layout, equipment selection, and built form to control noise.
- Address both the level and character of the noise, accounting for the assessable characteristics defined in the EPA Noise Protocol and prescribed characteristics under the EP Act.
- Address normal operation and routine equipment testing.

Prior to installing the converter station plant and any enclosing structures, prepare a design noise assessment report for the final converter station design. The report must:

- Document the systematic evaluation of noise control options.
- Describe the measures to be implemented to control environmental noise levels, demonstrating that all reasonable and practicable measures will be implemented to minimise the risk of harm as a result of noise, as required by the general environmental duty under the EP Act.
- Confirm the applicable noise limits (normal operation and routine equipment testing) determined in accordance with EPA Victoria Publication 1826.4 *Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues* (EPA Noise Protocol), accounting for the background monitoring data obtained for EPR NV01 and cumulative noise considerations.
- Provide details of the noise frequency characteristics of key items of plant such as the transformers and valve coolers, and assessment of whether character adjustments are warranted.
- Present predicted noise levels at noise sensitive locations (receivers) from operation of the converter station.
- Demonstrate that operational noise levels for the final design and equipment selections are predicted to comply with noise limits determined in accordance with the EPA Noise Protocol.
- Present an assessment of the potential for prescribed characteristics under the EP Act.

The design noise assessment report must be reviewed by the independent environmental auditor (IEA). Both the design noise assessment report and the IEAs review report must be made available to EPA Victoria on request.

**EPR ID**
**Environmental Performance Requirements**

NV05

**Develop an operation noise management plan for the converter station and transition station sites**

As part of the Operation Environmental Management Plan (OEMP), develop an operation noise management plan for the converter station and transition station (if required) sites in consultation with EPA Victoria. The operation noise management plan must document:

- The noise mitigation and management measures developed in design (EPR NV04) that apply to the operation and maintenance of the converter station.
- The confirmed applicable noise limits determined in accordance with the EPA Noise Protocol, including for routine testing of plant that is used solely for emergencies (i.e. standby generators for the converter station and the transition station), determined under EPR NV04.
- Procedures for, and timing of, noise monitoring to be carried out to assess compliance with the applicable noise limits when the converter station and transition station commences operation.
- Details and timing of a noise compliance reporting to be submitted to EPA Victoria.
- Details of any maintenance and monitoring measures that are required to maintain ongoing compliance with the *Environmental Protection Act 2017 (Vic)* (EP Act) including the general environmental duty.
- Procedures for routine testing of plant that is used solely for emergencies (e.g. regularity, days, and times of testing).
- Procedures to investigate noise complaints or suspected noise compliance issues.
- Protocols for continual improvement of the operation noise management plan, informed by data sources including but not limited to audit findings, complaint reviews and monitoring.

The operation noise management plan must be made available to EPA Victoria on request.

The operation noise management plan must be a sub plan to the OEMP and implemented during operation.

NV06

**Prepare an operation noise compliance assessment report**

Prepare an operation noise compliance assessment report based on:

- An inspection of the converter station and transition station to confirm that the noise mitigation and management measures documented in the operational noise management plan (EPR NV05) have been fully implemented.
- The results of noise monitoring conducted in accordance with the operation noise management plan (EPR NV05), to assess compliance with the applicable noise limits.

The report must be submitted to EPA Victoria within six months of each stage of the converter station becoming fully operational.

**EPR ID      Environmental Performance Requirements**

**Social**

**S01      Develop and implement a social impact management plan**

Prior to commencement of project works develop a social impact management plan. The plan must be developed in consultation with relevant government and local government agencies, key stakeholders, and directly affected parties to minimise social impacts across the project during construction.

The social impact management plan should be location specific and address key components of the construction program, including the staging of land cable trenching and installation. The plan should be a public document and be readily available on the project website.

The plan must include:

- A high-level summary of community baseline conditions, a summary of the anticipated social impacts (positive and negative), potential residual impacts and consideration for cumulative impacts. The plan will be reviewed and updated to address any shifts in the socioeconomic environment on the baseline and impacts, and consider the ongoing cumulative impacts of projects in the region.
- Incorporate key strategies, their objectives for managing social impacts and the responsibilities for implementation of the strategies including the workforce and accommodation strategy (EPR S02), community and stakeholder engagement framework (EPR S03), community benefits sharing scheme (EPR S04), and industry participation plan (EPR S05).
- An employment and training performance strategy with a focus on providing local opportunities.
- Describe the requirement for first response medical capabilities on-site for both local and non-local employees and contractors to minimise the impact on local health services.
- Outline of a protocol to be developed for engaging with community and managing social impacts during an emergency that must be developed in consultation with local emergency response providers and referenced in the project’s emergency response plan.
- Specific strategies to support local farming communities in the region to address potential impacts resulting from the project.

The social impact management plan must be implemented during construction.

**S02      Develop and implement a workforce and accommodation strategy**

Develop a workforce and accommodation strategy to address the potential social impact from the project’s workforce and accommodation requirements during construction. The strategy must:

- Be developed in consultation with government, industry and other relevant providers.
- Include a protocol for the identification and management of impacts due to accommodation requirements.
- Address cumulative impacts on accommodation due to other large-scale construction and infrastructure projects in the identified local study areas.

The outcomes of the strategy must be addressed during construction planning.

**EPR ID**
**Environmental Performance Requirements**

<p>S03</p>	<p><b>Develop and implement a community and stakeholder engagement framework</b></p> <p>Prior to commencement of project works, develop a community and stakeholder engagement framework to outline the approach to engagement with community, stakeholders and First Peoples will be undertaken for project and by all contractors. The community and stakeholder engagement framework must:</p> <ul style="list-style-type: none"> <li>➤ Identify key community and stakeholder groups across the project.</li> <li>➤ Describe the approach for engaging the community, stakeholders and First Peoples.</li> <li>➤ Establish communication protocols and tools for communication.</li> <li>➤ Outline complaints policies and management procedures for recording, managing, and resolving complaints. The complaints management system must be consistent with <i>Australian Standard AS/NZS 10002: 2014 Guidelines for Complaints Management in Organisations</i>.</li> </ul> <p>Principal contractors must prepare a community and stakeholder engagement management plan in accordance with the framework for their works package, and ensure sub-contractors comply with the management plan.</p> <p>The community and stakeholder engagement framework and contractor's community and stakeholder engagement management plan must be updated annually to reflect any project or stakeholder changes and improvements identified.</p> <p>A register of complaints must be maintained by MLPL and provided to the Minister for Planning with annual audit reporting if requested.</p> <p>The community and stakeholder engagement framework must be implemented during construction.</p>
<p>S04</p>	<p><b>Develop and implement a community benefits sharing scheme</b></p> <p>Prior to the commencement of project works, develop a community benefits sharing scheme in consultation with communities and First Peoples in the local study area.</p> <p>The community benefits sharing scheme should be developed having regard to <i>Community Engagement and Benefit Sharing in Renewable Energy Development: A Guide for Renewable Energy Developers (July 2021)</i>.</p>
<p>S05</p>	<p><b>Develop and implement an industry participation plan</b></p> <p>Prior to the commencement of project works, develop an industry participation plan to integrate First People, females, youth and socially vulnerable groups into the project workforce. The purpose of industry participation plan is to stimulate entrepreneurship, business and economic development, providing First Peoples and vulnerable groups with more opportunities to participate in the economy.</p> <p>The plan must:</p> <ul style="list-style-type: none"> <li>➤ Set out an employment and supplier-use participation target within the project's locality.</li> <li>➤ Outline the project's social procurement policies and local procurement policies considering each component and phase of construction.</li> <li>➤ Be developed in conjunction with the requirements under the <i>Indigenous Employment and Supplier-use Infrastructure Framework (February 2019)</i>.</li> <li>➤ Identify a range of potential opportunities for job-seekers and businesses to be involved in the project across the construction supply chain.</li> <li>➤ Set employment targets with reference to the local First Peoples working age population within the project area and consistent with the 'locals first principle'.</li> <li>➤ Identify opportunities for females, youth and other socially vulnerable groups to be involved in the project workforce.</li> </ul> <p>The plan must be implemented during construction and operation.</p>

**EPR ID**
**Environmental Performance Requirements**
**Surface water**

SW01

**Develop and implement an erosion and surface water management plan**

Prior to commencement of project works, develop a plan to manage erosion and surface water.

The plan must:

- ✓ Be developed in consultation with West Gippsland Catchment Management Authority
- ✓ Document the existing condition of all waterways and drainage lines potentially affected by construction (including their immediate surrounds) to establish baseline conditions and inform development of measures to manage potential impacts.
- ✓ Describe sediment and erosion controls and monitoring requirements in accordance with EPA Victoria Publication 1834.1 *Civil construction, building and demolition guide*, and with reference to the IECA *Best Practice Erosion and Sediment Control Guidelines 2008*.
- ✓ Identify controls to:
  - Maintain the key hydrologic and hydraulic functionality and reliability of existing flow paths and drainage channels.
  - Retain existing flow characteristics to maintain waterway stability downstream of construction.
  - Minimise erosion and acceleration of stream processes to protect bank stability of waterways and drainage channels that could be affected by directly or indirectly affected by construction activities, in accordance with West Gippsland Catchment Management Authority requirements.
- ✓ Details of measures for revegetation and reinstatement of the beds and banks of waterways and drainage lines in accordance with West Gippsland Catchment Management Authority requirements. The measures should be appropriate for the different categories of waterways and drainage channels considering if they are subject to shear stress that exceeds the boundary material resistance thresholds, and the extent of existing native vegetation in and around the stream that will be impacted.
- ✓ Location for storage of contaminated material, hazardous substances or stockpiled soil outside an appropriate flood level and to the requirements of EPA Victoria and the relevant drainage authority.
- ✓ Protocol for scheduling of works to minimise or avoid flood related risks (see EPR SW03).
- ✓ Details of the stormwater drainage system and spills containment measures for construction areas to manage the risk of hazardous spills and runoff to waterways from paved or trafficable surfaces. This must include requirements for bunding of excavations including joint pits to avoid contamination of stormwater.
- ✓ Measures for minimising, the handling, classifying, treating, disposing and otherwise managing wastewater. Wastewater from the site may be subject to approval by the relevant authority prior to discharges occurring and subject to classification under the Environment Reference Standard requirements in accordance with the EP Act.
- ✓ Emergency response protocol for flooding events and frac out during HDD construction under waterways. Methods for HDD drilling to prevent frac out and the use of non-toxic drilling fluids are described in EPR GW03.
- ✓ Review and update of the plan annually to address the outcomes of water quality monitoring as required by EPR SW03.
- ✓ The plan must be a sub plan to the CEMP and implemented during construction.

**EPR ID**
**Environmental Performance Requirements**

SW02

**Minimise flood risk due to permanent infrastructure**

Prior to commencement of project works, develop a design for permanent infrastructure to address the requirements outlined in the *Guidelines for Development in Flood Prone Areas* (West Gippsland Catchment Management Authority, 2020), that demonstrates how the project has been designed to mitigate the overall flood risk and incorporate flood protection measures where required.

The design must:

- Be developed in consultation with West Gippsland Catchment Management Authority.
- Be assessed and informed by a hydraulic flood model prepared for the design of permanent works to assess overall flood risk to the community and the project, predict changes to flow regimes, and to demonstrate the resultant flood levels and risk profile.
- Include a flood modelling report prepared to document the modelling and how it has addressed current climate conditions and the potential effects of climate change considering pre and post work scenarios as predicted at the end of assets design life using RCP4.5 and RCP8.5 projections (Ball, et al., 2019). The report must also outline how the hydraulic modelling has been scoped in consultation with West Gippsland Catchment Management Authority.
- Document the measures to manage overland stormwater flows and provide protection of joint pits, the converter station, transition station and any other permanent works from flood waters.
- Document the events and scenarios modelled to inform the overall flood risk to the community and the project, and assess potential flood damage to permanent works.
- Document mitigation measures developed to address areas of predicted increase flood risk and the engagement undertaken with the relevant drainage authority or asset owner to seek acceptance of the measures.

SW03

**Minimise impacts due to flooding during construction**

Prior to commencement of project works, develop a flood risk management plan to address the requirements outlined in the *Guidelines for Development in Flood Prone Areas* (West Gippsland Catchment Management Authority, 2020), that demonstrates how the project has been designed to mitigate the overall flood risk and incorporate flood protection measures where required.

The plan must:

- Be developed in consultation with West Gippsland Catchment Management Authority.
- Be assessed and informed by a hydraulic model prepared to assess overall flood risk and flow regime that could affect temporary work sites, and to demonstrate the resultant flood levels and risk profile during construction.
- Include a flood modelling report that document the events and scenarios modelled to inform the overall flood risk to the community and the project and assess potential flood damage to construction works.
- Document the measures and work scheduling requirements to minimise or avoid or minimise flood related risks for construction sites and temporary structures.

The flood risk management plan must be a subplan to the CEMP and implemented during construction.

**EPR ID**
**Environmental Performance Requirements**

SW04

**Develop and implement a surface water monitoring program**

Prior to commencement of project works, develop a surface water monitoring program to assess water quality and waterway conditions during construction. The monitoring program must:

- Be developed in consultation with the EPA Victoria and West Gippsland Catchment Management Authority
- Include monitoring locations at suitable distances both upstream and downstream of works to establish baseline conditions prior to construction.
- Include parameters, frequency, durations of water quality monitoring and waterway condition inspections.
- Be implemented for up to 12 months after commencement of operation, or a lesser period agreed with EPA Victoria (EPR SW05)
- Outline requirements for data to be reviewed to assess the discharges and runoff from the project against Environment Reference Standard requirements and confirm the effectiveness of environmental controls.
- Monitor the condition of reinstated waterway crossings and riparian vegetation to confirm the re-establishment of vegetation (EPR SW01).
- Be developed with reference to applicable policies and guidelines, including:
  - EP Act
  - Environment Reference Standard
  - Victorian Stormwater Committee's *Victoria Best Practice Environmental Management Guidelines for Urban Stormwater* (as published by CSIRO in 1999 with assistance from EPA Victoria and others)
  - EPA Victoria Publication 596 Point source discharges to streams: protocol for in-stream monitoring and assessment,
  - Industrial Waste Resource Guideline 701 Sampling and analysis of waters, wastewaters, soils and wastes

The surface water monitoring program must be implemented during construction with results used to inform the development, review and updating of the plan prepared to manage erosion and surface water (EPR SW01).

SW05

**Develop and implement measures to manage potential impacts to surface water in operation**

As part of the OEMP, develop and implement measures to avoid or minimise impacts to surface water during the operation, in accordance with West Gippsland Catchment Management Authority requirements. The measures must include:

- Ongoing surface water quality monitoring requirements, as outlined in the surface water monitoring program (EPR SW03).
- Controls for management of sites and materials to prevent erosion, runoff of contamination and sediments entering waterways
- Requirements for monitoring the establishment of revegetation at waterway crossings.



**EPR ID**
**Environmental Performance Requirements**
**Traffic and transport**
**T01**
**Develop a transport management plan**

Prior to commencement of project works, develop a transport management plan/s to document how disruption to affected local land uses, traffic, car parking, public transport (rail and bus), pedestrian and cycle movements and existing public facilities will be managed during all stages of construction. The transport management plan/s may be split into locations / areas where appropriate or aligned with construction methodology.

The transport management plan/s must:

- Be developed in consultation with relevant road authorities.
- Include requirements for maintaining transport capacity and appropriate performance for all travel modes in the peak travel demand periods.
- Identify where traffic management is required to lower the speed limit during construction, such as at the intersections to Strzelecki Highway if they are utilised to access the following locations: JP61, JP62, JP 65, JP66, HDD49a, JP67 (and any additional locations where it may be required).
- Identify the requirements for the provision of intersection treatments at the following locations if they are used by construction vehicles: South Gippsland Highway access to HDD15b, JP27, HDD16a; Strzelecki Highway access to LA07, and any additional locations where it may be required.
- Describe measures to manage any temporary or permanent full or partial traffic lane closures or impacts to property access.
- Include requirements for limiting the amount of construction heavy vehicles and haulage during the peak traffic periods with specific regard for sensitive land uses such as schools, school bus routes and during any local public events.
- Include requirements for the delivery or removal of oversize and over mass loads.
- Include a construction parking management plan to provide for adequate parking at appropriate works locations, including containing all worker car parking demands within the construction sites and laydown areas where practicable.
- Outline measures to manage impacts and coordinate activities where necessary with other relevant major projects occurring at the same time.
- Confirm and document the proposed route of the transformer transporter, including any necessary measures and works required to accommodate the height, weight and geometric requirements, and manage any associated impacts, during the transport. This must be informed by consultation with the relevant road authorities.
- Document construction vehicle routes including the transformer travel route and the transport of hazardous goods / materials, and prioritise the use of higher order roads, approaching the study area via the South Gippsland Highway and Princes Highway where possible.
- Identify construction vehicle staging areas and/or construction methodologies to minimise potential impacts of truck movements on residents and businesses.
- Describe methods investigated and adopted to reduce impact of project generated traffic i.e. shuttle bus for workers, stagger start / finish times.
- Requirements for the provision of adequate temporary road lighting over night at required intersections to access the construction site during HDD operations.
- Policies to ensure staff comply with relevant industry standards and guidelines with regards to safe practice, including managing driver fatigue. These policies should outline induction requirements for all workers, identifying site specific safe practice, such as identified locations on the road network with a known safety risk.
- Outline measures to manage the project interface with rail trails and provide for the continuous operation / access of the rail trails.

**EPR ID**
**Environmental Performance Requirements**

- Document how any road closures will be managed to ensure access is maintained, especially on roads that operate as a single point of access for private properties. These measures must be informed by engagement with affected properties, relevant road authorities and emergency services. The design and construction staging approach should aim to not close any public roads during construction, so far as reasonably practicable.
- Outline induction requirements for all workers, identifying site specific safe practice, such as identified locations on the road network with a known safety risk.
- Outline the inspections to be undertaken to assess the effectiveness of the transport management plans on all modes of transport. Where inspections identify adverse impacts, implement practicable and appropriate mitigation measures.
- Outline the requirements for worksite construction traffic management that are activity and location specific to manage day-to-day activities and the requirements of the transport management plan. This includes the movement of the transformer transporter.
- Include a consultation plan for the engagement with local authorities, impacted landholders and the broader community. This consultation will include, but not be limited to:
  - Informing affected parties of the level of traffic generated by the project construction and any road closures.
  - Engaging with local road authorities to coordinate construction vehicle movements to avoid school bus routes during their time of operation.
  - Engaging with road authorities and emergency services about any partial or full road closures.

The transport management plan/s must be updated when there are significant changes in construction methodology, including changes in construction traffic volumes or roads closures that requires further analysis to confirm adequacy and appropriateness of management measures.

The transport management plan/s must be implemented throughout construction.

**T02**
**Design transport infrastructure to maintain safety in operation**

Design all roadworks, construction staging, and site access arrangements as stipulated in the transport management plan (EPR T01) to meet relevant design standards and provide for safe movement of operational vehicles. The project design must:

- Be developed in consultation with the relevant road management authorities.
- Meet all relevant road and transport authority requirements with respect to transport network user safety.
- Be informed by appropriate transport analysis with the objective to maximise performance for all modes where necessary.
- Address the reinstatement of vehicle and pedestrian access that is to be altered during construction, in accordance with relevant road design standards.
- Consider any services relocations and the requirements of services authority approvals.
- Be audited by an independent road safety auditor during the preparation of the design, at design stages to be agreed upon with the relevant road authority. In addition, the project is to agree upon authority requirements as it relates to road safety audits during construction and post construction.
- Be informed by inspection and assessment of existing road and pavement conditions by suitably qualified engineers.
- Provide for appropriate upgrades of pavement, bridges, intersections and other road infrastructure, in line with the recommendations of the road safety audit and condition inspections.

EPR ID

Environmental Performance Requirements

Terrestrial ecology

EC01

**Avoid or minimise native vegetation and habitat loss and degradation**

Prior to commencement of project works and to inform the design:

- Complete vegetation quality assessments at locations that could be impacted by the areas of disturbance of the final design and require further assessment to confirm vegetation type and extent. Areas to be surveyed, if impacted, include those shown in Figure 6 of Technical Appendix V: Terrestrial Ecology Assessment.
- Complete habitat assessments and targeted surveys at locations that could be impacted by the areas of disturbance of the final design and required further assessment to determine habitat suitability and/or presence/absence of threatened species. Areas to be surveyed, if impacted, include those shown in Figure 5 of EIS/EES Technical Appendix V.
- Complete fauna utilisation surveys of all impacted hollow-bearing trees within areas of priority habitats shown in Figure 5 of EIS/EES Technical Appendix V, to identify nesting sites and minimise removal of hollow bearing trees.
- Develop and implement measures to avoid or otherwise minimise impacts on native vegetation and priority habitats, so far as reasonably practicable, through detailed design and appropriate construction methods, at locations shown in Figure 7 of EIS/EES Technical Appendix V. Where feasible, measures will include:
  - Minor realignment of the Area of Disturbance.
  - Reducing the width of the Area of Disturbance.
  - Use of trenchless technologies such as HDD.
- Develop and implement construction methods that avoid impacts to the Gippsland Red Gum (*Eucalyptus tereticornis subsp. mediana*) Grassy Woodland and Associated Native Grassland Threatened Ecological Community including the related FFG Act listed Threatened Ecological Community located along McFarlane Road, Hazelwood as shown in Figure 5.42 of EIS/EES Technical Appendix V.
- Prior to construction and to inform detailed design, complete an arboriculture assessment of trees impacted due to consequential losses and encroachment of tree protection zones, as shown in Figure 6 of EIS/EES Technical Appendix V. Inspections by qualified arborists must be undertaken to inform measures which may minimise the likelihood of trees being lost.
- Obtain native vegetation offsets in accordance with the *Guidelines for removal, destruction or lopping of native vegetation* (DELWP 2017) for the native vegetation to be removed based on the detailed design.

EC02

**Develop and implement a biodiversity management plan**

Prior to commencement of project works develop a biodiversity management plan to avoid or otherwise minimise impacts to flora and fauna values.

The vegetation and habitat management measures must cover, but not be limited to:

- Identification and protection of native vegetation and priority habitats to be retained as shown in Figures 5 and 6 of EIS/EES Technical Appendix V. This must include pre-construction assessment to flag vegetation to be removed and retained and establishment of no-go zones to a standard suitable to prevent access during construction.
- Implementation of appropriate measures to manage the risk of the introduction and spread of environmental weeds and diseases during construction in areas supporting native vegetation, priority habitats and threatened ecological communities, as shown in Figures 5 and 6 of EIS/EES Technical Appendix V including relevant approved EPBC Act threat abatement plans.
- Manage all work areas to maintain landform stability and avoid or minimise erosion and sedimentation, and avoid storage of excess soil or fill material upslope or adjacent to native vegetation and priority habitats (to the extent not already addressed under EPR GM02, GM03, GM06, GM07, GM08).
- Use of sedimentation and pollution controls to prevent uncontrolled releases into retained native vegetation and priority habitats, as shown in Figures 5 and 6 of EIS/EES Technical Appendix V (to the extent not already addressed under EPR GM08 and SW01).
- Use of locally indigenous species in revegetation or plantings, particularly in areas where habitat is removed that is suited to the landscape context and associated native species requirements.
- Where possible, avoid removal or disturbance of root systems associated with native vegetation in areas of priority habitat, to prevent impacts to ground-dwelling fauna (e.g. crayfish).
- Incident management protocols for addressing accidental clearing of vegetation or habitat through assisted regeneration or additional offsets.

The flora and fauna species management measures must cover, but not be limited to:

- Undertaking pre-clearing inspections by a suitably qualified ecologist to confirm the on-site location of fauna immediately prior to habitat removal.
- Salvage and re-location of fauna, if required prior to construction, in accordance with the *Wildlife Act 1975 (Vic)* and *EPBC Act (Cwlth)* where required.
- Daily inspections of open trenches or pits for trapped animals, such as reptiles and small-ground dwelling mammals.
- Utilising night lighting to a minimum amount required to safely operate the site and to reduce light pollution and adverse effects to nocturnal species in accordance with Night Light Pollution Guidelines for Wildlife (DCCEEW 2023). This must include using:
  - light shields to direct light and reduce light spill.
  - low beam vehicle lights except where safety is compromised.
- Work restrictions during sensitive life-stages (e.g. breeding, nesting, etc.) within 100m of priority habitats, as shown in Figure 5 of EIS/EES Technical Appendix V, to avoid and minimise disturbance to native fauna (with a particular focus on noise and light pollution). This may include restrictions on work activities during a season (e.g., spring), species life stage (e.g., breeding or nesting) or time of day (e.g., night-time), based on the ecology of the species and proximity to habitats. Where work restrictions are not feasible, develop and implement alternative control measures (e.g. light shields).
- Installation of temporary wildlife barriers near priority habitats to prevent the movements of ground-dwelling fauna into high-risk areas, such as access tracks.
- Ensuring speed limits within works areas are restricted to appropriate levels, and enforced, to minimise the risk of faunal strikes.
- Managing native fauna that may be displaced due to habitat removal, in compliance with the *Wildlife Act 1975 (Vic)*.
- Procedures if unexpected threatened species are identified during construction.

The biodiversity management plan must be a sub plan of the CEMP and must be implemented during construction.

**EPR ID      Environmental Performance Requirements**

**EC03      Implement aquatic habitat protection measures**

Avoid and minimise impacts to aquatic habitat, so far as reasonably practicable, through adopting trenchless construction methods (such as HDD) or project alignment changes at the following waterway crossing locations: Morwell River, Tarwin River East Branch, tributaries of the Tarwin River East Branch, Stony Creek, Buffalo Creek and Fish Creek, as shown in Figure 6 of EIS/EES Technical Appendix V.

If any flowing or ephemeral waterways that are deemed to be potential habitat for threatened species are proposed to be open-cut or directly impacted, conduct aquatic surveys prior to commencement of project works to inform design and construction methods.

Where direct impacts to waterways are likely to occur, prepare a site environmental management plan with reference to the plan prepared to manage erosion and surface water in accordance with EPR SW01 and in consultation with the West Gippsland Catchment Management Authority covering:

- Details for retention and protection of riparian and instream vegetation, dead and alive standing trees and fallen timber and other habitat values.
- Requirements for salvage and translocation of aquatic fauna prior to construction, in accordance with the *Wildlife Act 1975 (Vic)*.
- Approach for the implementation of appropriate measures to manage the risk of the introduction and spread of environmental weeds and diseases during construction in aquatic habitats.
- Document the locations of where measures must be applied.

The plan must be a sup plan of the CEMP and be implemented in construction.

**Underwater cultural heritage**

**UCH01      Undertake a magnetometer survey for the final Victorian shore crossing project alignment and additional geophysical surveys if the alignment is revised to be outside the study area**

Prior to commencement of marine construction, undertake a magnetometer survey of the project alignment to assess the potential for maritime heritage sites for the final Victorian shore crossing.

If the alignment is revised to a location outside the areas where geophysical surveys have been completed, undertake geophysical surveys for the revised section to the same standard as the rest of the alignment, prior to commencement of construction. Identified anomalies that cannot be avoided are to be assessed and managed as per EPR UCH02.

Any additional geophysical survey must be done to the same standard, that is, the same data acquisition parameters, interpretation and presentation as the surveys completed by MLPL in 2019 and 2020 in the development of the subsea project alignment. That data must be reviewed by a suitably qualified maritime archaeologist with experience in maritime heritage and submerged Aboriginal heritage.

The outcomes of these surveys must inform the development of the management plan for underwater cultural heritage (EPR UCH04).

**EPR ID      Environmental Performance Requirements**

**UCH02      Avoid impacting unverified seabed anomalies identified in the marine geophysical survey**

Prior to commencement of marine construction, refine the subsea project alignment to ensure unverified seabed anomalies are avoided and apply a buffer of 10 to 50 m depending on the nature of the anomalies (Refer to Table 12-1 of EIS/EES Technical Appendix I for recommended buffer distances from identified anomalies). The buffer must be determined in consultation with a qualified maritime archaeologist. Where anomalies cannot be avoided by more than 10 m, further investigations should be undertaken to assess their cultural heritage values.

These further investigations should include:

- Visual inspections by diving in waters less than 30 m or a remotely operate vehicle in deeper water.
- The assessment of the maritime heritage values of an anomaly must be undertaken by a qualified maritime archaeologist.
- If culturally significant anomalies cannot be avoided, appropriate mitigation measures should be developed and implemented. Mitigation could take the form of a detailed survey and/or archaeological excavation which may require a permit.

The outcomes of these investigations must inform the development of the management plan for underwater cultural heritage (EPR UCH04).

**UCH03      Minimise potential impacts to the submerged beach ridge landforms**

Prior to commencement of marine construction, obtain sufficiently detailed information about the submerged beach ridge formations, which occur at the locations shown in Figure 9-2 and Table 9-3 of EIS/EES Technical Appendix I, to assist in refinement of design to minimise potential impact to cultural heritage values associated with the landscape prior to inundation.

The sufficiently detailed information includes obtaining high resolution video and multi-beam data along the route where it crosses the beach ridges.

By the completion of construction, have a 3D model prepared using the detailed information collected prior to construction to contribute to the interpretation of these formations as they could have appeared prior to sea level rise. This will be provided to the relevant First Peoples groups.

If construction requires trenching through the beach ridge landform, the impacts must be assessed and minimised during construction, and mitigation measures implemented where required.

These measures must be overseen by a qualified maritime archaeologist and inform the development of the management plan for underwater cultural heritage (EPR UCH04).

**EPR ID**
**Environmental Performance Requirements**

UCH04

**Manage impacts and unexpected finds by developing and implementing a management plan for Underwater Cultural Heritage.**

Prior to commencement of marine construction, develop an underwater cultural heritage management plan detailing measures to avoid and minimise impacts on underwater cultural heritage and archaeology for both First Peoples and maritime heritage. The plan must be prepared by an experienced and qualified maritime archaeologist, informed by all available data collected for the alignment and be informed by engagement with First Peoples (EPR EM08). The plan must include:

- An unexpected finds protocol.
- Artefact and site recognition guide.
- Artefact and site recording standards that conform to relevant State and Commonwealth requirements.
- Detailed maps of no anchoring zones.
- Inductions prepared for contractors and criteria for when different inductions are required to address separate work activities.
- The required approach and frequency for site/sea floor inspections before, during construction and after construction (if required) where anomalies can't be avoided with a 10 m buffer or if significant sites are identified along the alignment.

The plan must be implemented during construction.

Table 2-11 Recommended ecology and Social EPRs for Tasmania to address EPBC Act matters

EPR ID	Environmental Performance Requirements
<b>Social</b>	
S01 Tas	<p><b>Develop and implement a social impact management plan</b></p> <p>Prior to commencement of project works develop a social impact management plan. The plan must be developed in consultation with relevant government and local government agencies, key stakeholders, and directly affected parties to minimise social impacts across the project during construction.</p> <p>The social impact management plan should be location specific and address key components of the construction program, including the staging of land cable trenching and installation. The plan should be a public document and be readily available on the project website.</p> <p>The plan must include:</p> <ul style="list-style-type: none"> <li>➤ A high-level summary of community baseline conditions, a summary of the anticipated social impacts (positive and negative), potential residual impacts and consideration for cumulative impacts. The plan will be reviewed and updated to address any shifts in the socioeconomic environment on the baseline and impacts and consider the ongoing cumulative impacts of projects in the region.</li> <li>➤ Incorporate key strategies, their objectives for managing social impacts and the responsibilities for implementation of the strategies including the workforce and accommodation strategy (EPR S02 Tas), community and stakeholder engagement framework (EPR S03 Tas), community benefits sharing scheme (EPR S04 Tas), and industry participation (EPR S05 Tas).</li> <li>➤ An employment and training performance strategy with a focus on providing local opportunities</li> <li>➤ Describe the requirement for first response medical capabilities on-site for both local and non-local employees and contractors to minimise the impact on local health services.</li> <li>➤ Outline of a protocol to be developed for engaging with community and managing social impacts during an emergency that must be developed in consultation with local emergency response providers and referenced in the project’s emergency response plan.</li> </ul> <p>The social impact management plan must be implemented during construction.</p>
S02 Tas	<p><b>Develop and implement a workforce and accommodation strategy</b></p> <p>Develop a workforce and accommodation strategy to address the potential social impact from the project’s workforce and accommodation requirements during construction. The strategy must:</p> <ul style="list-style-type: none"> <li>➤ Be developed in consultation with government, industry and other relevant providers.</li> <li>➤ Include a protocol for the identification and management of impacts due to accommodation requirements.</li> <li>➤ Address cumulative impacts on accommodation due to other large-scale construction and infrastructure projects in the identified local study areas.</li> </ul> <p>The outcomes of the strategy must be considered during construction planning.</p>



**EPR ID                      Environmental Performance Requirements**

**S03 Tas                      Develop and implement a community and stakeholder engagement framework**

Prior to commencement of project works, develop a community and stakeholder engagement framework to outline the approach to engagement with community, stakeholders and First Peoples will be undertaken for project and by all contractors. The community and stakeholder engagement framework must:

- Identify key community and stakeholder groups across the project.
- Describe the approach for engaging the community, stakeholders and First Peoples.
- Establish communication protocols and tools for communication.
- Outline complaints policies and management procedures for recording, managing, and resolving complaints. The complaints management system must be consistent with Australian Standard *AS/NZS 10002: 2014 Guidelines for Complaints Management in Organisations*.

Principal contractors must prepare a community and stakeholder engagement management plan in accordance with the framework for their works package.

The community and stakeholder engagement framework and contractor’s community and stakeholder engagement management plan must be updated annually to reflect any project or stakeholder changes and improvements identified.

The community and stakeholder engagement framework must be implemented during construction.

**S04 Tas                      Develop and implement a community benefits sharing scheme**

Prior to the commencement of project works, develop a community benefits sharing scheme in consultation with communities and First Peoples in the local study area.

The community benefits sharing scheme should be developed having regard to *Renewable energy development in Tasmania: A guideline for community engagement, benefit sharing and local procurement (Draft 2022, Department of State Growth)*.

**S05 Tas                      Develop and implement an industry participation plan**

Prior to the commencement of project works, develop an industry participation plan to integrate First Peoples, females, youth and socially vulnerable groups into the project workforce. The purpose of industry participation plan is to stimulate entrepreneurship, business and economic development, providing First Peoples and vulnerable groups with more opportunities to participate in the economy.

The plan must:

- Set out an employment and supplier-use participation target within the project’s locality
- Outline the project’s social procurement policies and local procurement policies considering each component and phase of construction.
- Be developed in conjunction with the requirements under the Indigenous Employment and Supplier-use Infrastructure Framework (February 2019)
- Identify a range of potential opportunities for jobseekers and businesses to be involved in the project across the construction supply chain.
- Set employment targets with reference to the local First Peoples working age population within the project area and consistent with the ‘locals first principle’.
- Identify opportunities for females, youth and other socially vulnerable groups to be involved in the project workforce.

The plan must be implemented during construction and operation.

**EPR ID Environmental Performance Requirements**

**Terrestrial ecology**

**EC01 Tas Minimise vegetation removal and implement and implement vegetation protection measures**

- To inform the project design, develop and implement measures to avoid and otherwise minimise to the extent practicable impacts on native vegetation. The design must avoid the eucalyptus woodland vegetation in the northeast corner of the site.
- Prior to commencement of project works, develop a vegetation management plan to avoid and otherwise minimise impacts to vegetation, covering as a minimum:
  - Identification of areas of important flora and fauna habitat to be protected during construction.
  - Fencing protected areas and no-go zones to prevent access during construction.
  - Pre-construction site assessment to confirm that vegetation and trees to be retained have been adequately protected from impact.
  - Vegetation clearing controls and protection measures.
  - Implementation of appropriate measures to manage the risk of spread and introduction of weeds and pathogens during construction.
  - Procedures if unexpected threatened species are identified.

The vegetation management plan must be a sub plan of the CEMP and implemented during construction.

**EC02 Tas Implement measures to protect fauna**

Prior to commencement of project works, develop a fauna management plan to avoid and otherwise minimise impacts to fauna, covering as a minimum:

- Protection measures for Tasmanian devils and Spotted-tail quolls with a focus on construction traffic and awareness regarding roadkill included in site inductions.
- Recording and reporting process for incidents of vehicle strikes and/or roadkill of Tasmanian devils and Spotted-tail quolls on Minna Road between intersection with Bass Highway and the entry to site, where vehicles associated with the project will travel. Reporting of roadkill of Tasmanian devils and Spotted-tail quolls to the Department of Natural Resources and Environment Tasmania. Removing mortalities off the road within a specified distance of site to reduce attracting carnivorous fauna.
- Utilisation of night lighting to a minimum amount required to safely operate the site and to reduce light pollution and adverse effects to fauna species.
- Management procedures to avoid animals entering trenches or being recovered from trenches and excavated areas.
- Preclearance surveys of construction areas for threatened fauna species prior to vegetation removal and undertaken by a suitably qualified ecologist.

The fauna management plan must be a sub plan of the CEMP and implemented during construction.

**EPR ID                      Environmental Performance Requirements**

**EC03 Tas                      Implement measures to protect raptors**

Prior to commencement of project works confirm that there are no nests within a distance of 500 m of the site boundary, or within 1 km line-of-sight prior to construction using data collected within one year of construction commencing.

Undertake further nest survey if there is no current (within one year) survey of nest presence and to avoid impacts to raptors outside of the breeding season, as per the *Threatened Tasmanian Eagles Recovery Plan 2006-2010* and the Environment Protection Authority’s *Guide to Eagle Nest Searching and Nest Activity Checks*.

If a nest is observed within a distance of 500 m of the site boundary, or within 1 km line-of-sight prior to construction the following will be required:

- Avoid project activities within a distance of 500 m, or within 1 km line of sight of active eagle nests during breeding season in accordance with guidelines outlined in the FPA Fauna Technical Note No. 1.
- Construction to be deferred until outside of the breeding season if a nest within a distance of 500 m, or within 1 km line of sight is determined to be active as per FPA Fauna Technical Note No. 1. All nests are to be treated as active during the breeding season until determined as inactive by a suitable qualified person.

**EC04 Tas                      Operational implementation of vegetation protection measures**

As part of the OEMP, develop a vegetation management plan for operations to avoid and otherwise minimise impacts that covers:

- Demarcation of areas of important flora and fauna habitat to be protected during normal maintenance and operations.
- Implementation of appropriate measures to manage the risk of spread and introduction of weeds and pathogens during normal maintenance and operations.

The vegetation management plan must be a sub plan to the OEMP and implemented in operation.

**EC05 Tas                      Operational implementation of measures to protect raptors**

As part of the OEMP, develop a nest management strategy to avoid impacts to raptors during major operational and maintenance activities (e.g. long-term increase in site activity that includes use of crane/s for lifting and replacing large components and equipment)

Prior to major operational and maintenance activities, confirm that there are no nests within a distance of 500 m of the site boundary or within 1 km line-of-sight prior to activities, using data collected within one year prior to the commencement of construction.

Undertake a further nest survey if there is no recent (within one year) survey data of nest presence outside of the breeding season, as per the *Threatened Tasmanian Eagles Recovery Plan 2006-2010* and the Environment Protection Authority’s *Guide to Eagle Nest Searching and Nest Activity Checks*.

- If a nest is observed within a distance of 500 m or within 1 km line-of-sight prior to major operational/maintenance activities the following will be required:
- Avoid major activities within a distance of 500 m or within 1 km line of sight of active eagle nests during breeding season in accordance with guidelines outlined in the FPA Fauna Technical Note No. 1
- Defer major activities until outside of the breeding season if a nest within a distance of 500 m, or within 1 km line of sight is determined to be active as per FPA Fauna Technical Note No. 1. All nests are to be treated as active during the breeding season until determined as inactive by a suitable qualified person.