OW Management Plan Summary for Floating LiDAR

Date: **05 December 2025**

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Definitions, acronyms and abbreviations

Term	Definition	Reference
Adjacent	Next to or very near something else; neighbouring; bordering, contiguous; adjoining.	Oxford English Dictionary, 2011
Consultees	Persons, organisations, communities or groups required to be consulted in preparation of the management plan	Consultation and engagement for OEI management plans (OIR, 2025a)
Licence activity	In relation to a licence or a proposed commercial licence, means an offshore infrastructure activity or other activity carried out, or to be carried out, in the licence area under the licence or the proposed commercial licence	Regulation 4
Reasonable period	The time afforded to consultees to consider the information is sufficient based on the licence activity, potential effects, availability of consultee, ability to receive information and other accessibility matters	Consultation and engagement for OEI management plans (OIR, 2025a)
Stakeholders	Persons, organisations, communities or groups that fall within the scope of the stakeholder engagement strategy collectively	Regulation 82
Sufficient information	Enough information provided to consultees to allow for an informed assessment of any reasonably foreseeable effect that the activities subject to consultation may have	Consultation and engagement for OEI management plans (OIR, 2025a)

Table 1-1 Definitions

Term	Definition
ADCP	Acoustic Doppler Current Profiler
BIA	Biologically important area
DCCEEW	Department of Climate Change, Energy, the Environment and Water
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ERP	Emergency Response Plan
FLS	Floating LiDAR System
GDA	Geocentric Datum of Australia
HAZID	Hazard identification
HSE	Health, Safety and Environment
HSEQ	Health, Safety, Environment and Quality
HSSEQ	Health, Safety, Security, Environment and Quality
LiDAR	Light Detection and Ranging
OEI Act	Offshore Electricity Infrastructure Act 2021
OHS Act	Occupational Health and Safety Act 2004
OIR	Offshore Infrastructure Regulator
PCBU	Person conducting a business or undertaking
TGS	TGS-Nopec Geophysical Company Pty Ltd
WHS	Work Health and Safety

Table 1-2 Abbreviations and acronyms

1. Overview

Ocean Winds is an offshore wind developer, owner and operator, formed through a 50-50 joint venture between EDP Renewables and ENGIE. Both companies have significant experience in the renewable energy sector and were awarded a feasibility licence for the High Sea Wind project (the project) on 1 May 2024 under the *Offshore Electricity Infrastructure Act 2021* (Cwth) (OEI Act). The project is located in Part 2 of the Gippsland Declared Area (OEI-01-2022, Figure 12) and is aiming to deliver 1.28 gigawatt (GW) of renewable energy by 2031.

Under Feasibility Licence FL-002, High Sea Wind is proposing to undertake wind resource and metocean monitoring as the first in several preliminary feasibility studies required to inform the development of the project. This monitoring will be undertaken using a floating Light Detection and Ranging (LiDAR) buoy. The objective of the proposed wind resource and metocean monitoring is to obtain site-specific baseline data on wind, wave and current conditions, water level and atmospheric conditions. This data will provide a detailed understanding of the meteorological and oceanographic conditions within the feasibility licence area.

Under the Offshore Electricity Infrastructure Amendment Regulations 2024 (the regulations) an approved management plan is required to construct, install, commission, operate, maintain, or decommission offshore infrastructure, which includes installation of a floating LiDAR buoy. The management plan is a key component of the OEI Act framework, which describes how a licence holder will manage offshore infrastructure within their licence. The plan will be revised in the future to cover other feasibility activities such as geotechnical investigations. The management plan was written to meet the relevant requirements under part 3 of the OEI Act framework.

The management plan was approved by the Commonwealth Offshore Infrastructure Regulator (OIR) on the 7th November 2025.

This management plan summary has been developed in accordance with regulation 77 Offshore Electricity Infrastructure Regulations 2022 (OEI Regs).

1.1 Licence holder details

Company name / registered licence holder: High Sea Wind Pty Ltd

Location: Level 18, 1 Nicholson Street, East Melbourne, Australia

Email: contact@highseawind.com

Phone: +61 401 193 946

2. Activities and operations

In accordance with Regulation 80 this section summarises the activities and operations for the licence activities.

2.1 Scope of the licence activity

The licence activity for which the management plan has been developed, and for which the project is seeking approval under the OEI Act, relates to the temporary installation (via tethering to the seabed) of a floating LiDAR buoy within Feasibility Licence FL-002 for the purpose of assessing the feasibility of exploiting a renewable energy resource i.e., wind. For this activity, the LiDAR buoy and associated mooring (tethering) equipment, collectively known as the floating LiDAR system (FLS), are considered the offshore renewable energy infrastructure (OREI).

The installation, maintenance and retrieval of the LiDAR buoy and associated mooring (tethering) equipment is to be conducted from a vessel located directly above and adjacent to the tethering site within the licence area. For this activity, the vessel will be temporarily on location to facilitate LiDAR deployment, maintenance and retrieval and at no point will be moored on location. As such, the vessel is not considered an OREI, and other laws to regulate vessels or maritime activities apply to vessel operations rather than the OEI Act.

The management plan, whilst providing contextual information on the broader offshore infrastructure project and regional environment, does not cover any works or activity not directly related to the licence activity, such as equipment pre-commissioning, onshore or near shore activities including those from port, or transit activities to and from the LiDAR deployment site.

The following subsections provide both specific information as it relates to the licence activity and broader contextual information to support activity planning and management.

The management plan provides both specific information as to the management of the licence activity and general contextual information, yet only those relating to the licence activity are considered relevant for compliance of the OEI Act and OEI regulations within this plan.

The management plan has been prepared for the temporary installation of the floating LiDAR as the only activity proposed. Future revisions of the management plan updates will include information regarding proposed offshore geotechnical campaigns for the project. These campaigns are proposed to take place between January 2026 and April 2031. The specific timing of the activities will be established following the confirmation of approvals, including approval of the revised management plan, and the procurement of equipment. Any obligations required under the EPBC Act for geotechnical surveys will be included in the revised management plan. Consultation for the spatial and temporal extent of the geotechnical survey area will be documented as part of the management plan revision.

2.2 Description of physical environment and operating conditions

2.2.1 Regional context

The High Sea Wind feasibility licence area (FL-002) is located off the coast of Gippsland in the Bass Strait, an area of the Southeast Marine Region. The Southeast Marine Region features a dynamic and complex marine environment with diverse benthic habitats and active sediment processes that support a rich and varied ecosystem. The average water depth of the Bass Strait is 60 metres, and the seabed is characterised by mostly soft, sandy sediments (CoA 2015).

Several currents pass through the region, including the East Australian Current and the Leeuwin/ South Australian Current. These seasonal currents are driven by winds, tides, changes in water temperature and the relatively shallow water depth of the Bass Strait (CoA 2015).

2.2.2 Physical Environment

2.2.2.1 Metocean conditions

Whilst the purpose of floating LiDAR buoy deployment is to obtain metocean data, including wind, wave and current data, the anticipated metocean conditions are summarised in Table 2-1(National Centres for Environmental Information 2025).

Condition	Description
Wind speeds	Average wind speeds are around 10 metres per second. Wind direction is mainly easterly direction during summer and westerly direction.
Currents	Currents are moderate and have a north-east to south-west orientation.
Significant height of combined wind waves and swell	Up to four metres.
Average surface water temperature	13.6 to 17.4 degrees Celsius

Table 2-1 Metocean conditions for High Sea Wind feasibility licence area

2.2.2.2 Bathymetry and seabed

Water depths within the feasibility licence area range between 59 metres and 67 metres (Mean Sea Level).

The feasibility licence area lies entirely on shelf waters, which is characterised by soft sediments with gravels and sands covering most of the Bass Strait shelf waters and fine shelly sands occurring along the inner shelf of south-eastern Victoria (Jones & Davies 1983). Sediment mobilisation in the region is primarily influenced by tidal movements, with the high energy conditions of the Bass Strait transporting fine-grained sediments into the central basin or out onto the shelf (Harris 1994; Harris & Coleman 1998).

2.2.3 Sediment and water quality

The Victorian EPA monitoring data indicate that the offshore marine environment in the Gippsland Basin maintains moderate to good water quality, with variations influenced by natural oceanographic processes and seasonal factors. While nutrient levels occasionally rise, potentially contributing to localised eutrophication risk, overall, the offshore waters remain supportive of marine biodiversity and ecosystem health.

No known pollutants or spills have been recorded in the feasibility licence area. Water quality at this location is unknown but will be tested as part of the floating LiDAR survey. Other studies near this location have described that the nutrient concentrations in this are comparatively low. Dissolved metals have also been found to be low, and hydrocarbons have been found to be below laboratory Practical Quantitation Limits. Water quality closer to the shore may be negatively affected by the discharge of polluted waters from rivers which drain catchments used for stock grazing and coastal settlements (Beach Energy 2024).

2.2.4 Underwater cultural heritage

No known European underwater cultural heritage sites have been identified within the licence area. Indigenous underwater cultural heritage may be present and will be assessed further as part of the marine survey program. Other studies of the Bass Strait have found that various submerged landforms are present in both Victorian state and Commonwealth waters (Marinus Link 2024). These landforms are likely to contain potential artefact scatter, midden or other significant cultural artefacts. Further assessment of the licence area is required to determine whether there are submerged landforms present and the archaeological significance of these landforms.

The offshore Gippsland area is within the Sea Country of the Gunaikurnai people. In 2022, The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) entered into an agreement with the Commonwealth Government to establish a Sea Country Indigenous Protection Area (IPA) within the Bass Strait. The IPA covers the nearshore area from Nanjet, east of Wilsons Promontory, to Mallacoota. The IPA will be managed by GLaWAC to preserve and protect cultural values in the marine environment.

2.2.5 EPBC Act Protected Matters

The *Environment Protection and Biodiversity Conservation Act 1999* (Cwth) (EPBC Act) is the key piece of Commonwealth legislation that provides a legal framework to protect and manage matters of national environmental significance (MNES) including World Heritage properties, National Heritage places, Ramsar wetlands, Commonwealth marine areas, listed threatened species and ecological communities and listed migratory species.

A search using the Protected Matters Search Tool was conducted for the feasibility licence area. A summary of MNES within this area is shown in Table 2-2.

Matter	Detail	Presence
Matters of national environmental significance	World Heritage Properties	None
	National Heritage Properties	None
	Wetlands of International Importance (Ramsar)	None
	Great Barrier Reef Marine Park	None
	Commonwealth Marine Area	Yes, as defined under the EPBC Act
	Listed Threatened Ecological Communities	None
	Listed Threatened Species	39
	Listed Migratory Species	42
Other matters protected by the EPBC Act	Commonwealth Heritage Places	None
	Listed Marine Species	61
	Whales and other cetaceans	14
	Critical habitats	None
	Commonwealth Reserves Terrestrial	None
	Australian Marine Parks	None
	Habitat Critical to the Survival of Marine Turtles	None
	Key Ecological Features	None
	Biologically Important Areas	14

Table 2-2 Summary of MNES within the feasibility licence area

2.2.5.1 Marine protected areas

The licence area is not located within any listed marine parks. It is within the Commonwealth Marine Area. The closest Commonwealth Marine National Park is the Beagle Australian Marine Park, which is located approximately 45 kilometres from the licence area. The nearest state National Park is the Ninety Mile Beach Marine National Park, approximately 72 kilometres from the licence area. The Corner Inlet and Gippsland Lakes Ramsar wetlands are both located approximately 90 kilometres from the licence area.

2.2.6 Other marine users

2.2.6.1 Commercial Fishers

The feasibility licence area has been and continues to be used for commercial fishing. The main fisheries that overlap the area are Sark Gillnet fisheries and Danish Seine fisheries. Commercial and state fisheries don't overlap with the feasibility licence area.

2.2.6.2 Commercial shipping

The area where the floating LiDAR would be located is in a low-density shipping area (1500-5000 movements per month) as shown in Figure 9. A higher density shipping area (running east-west) is located to the north of the High Sea Wind feasibility licence area.

2.2.6.3 Defence

The licence area overlaps with the Defence Consultation Area as presented within Schedule 4 – Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022. It is outside marine firing practice areas and known unexploded ordinance regions; however unexploded ordinances may still be present within or near the licence area.

2.2.6.4 Offshore infrastructure

The licence area is within the CarbonNet Greenhouse Gas Assessment Permit area (G-5-AP). There are no other offshore infrastructure such as petroleum titles or submarine cables that currently overlap, or are directly adjacent to, the feasibility licence area.

2.2.6.5 Other marine users

Other marine users, including recreational fishers, First Nations fishers, aquaculture and marine-based tourism and recreational activities are present in the offshore Gippsland region, but are not known occur as far out to sea as the licence area. The management plan feasibility activity therefore will likely not affect the operations of these activities.

2.3 Location of licence area and activities

The floating LiDAR buoy will be located within the High Sea Wind licence area (Feasibility Licence FL-002), within Part 2 of the Gippsland declared area (OEI-01-2022).

The floating LiDAR buoy is planned to be deployed within the High Sea Wind feasibility licence area within the Bass Strait, a region of continental shelf between mainland Australia and Tasmania. The coordinates of the floating LiDAR buoy will be -38.974, 147.859 (GDA 2020). This location and the waters directly adjacent to this location where the vessel will operate whilst undertaking regulated offshore activities, and within the excursion radius of the LiDAR equipment around the clump weight (mooring) is considered the 'site' of licence the activity. Distance to nearest shoreline from the boundary of FL-002 is approximately 76 kilometres (km) while the distance of the activity site is approximately 87 km.

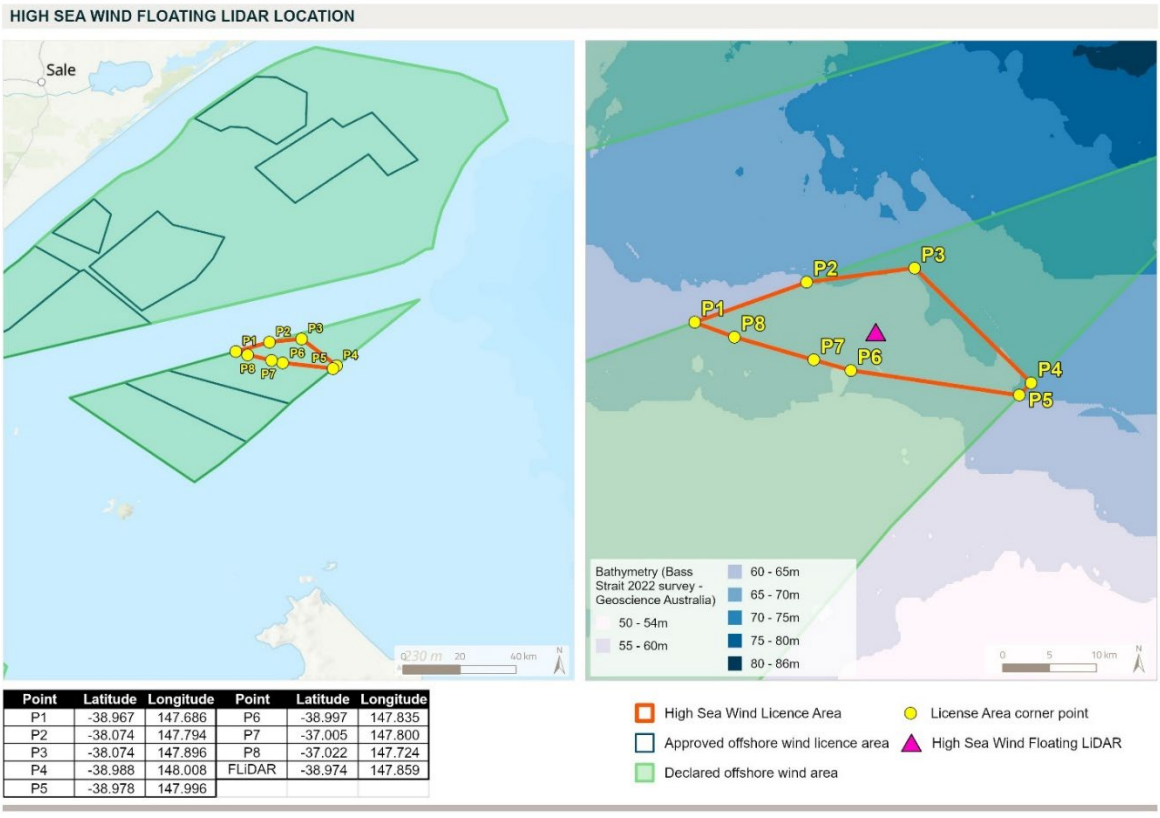
For context, the broader feasibility licence area is 150 km^2. The licence area is defined by a line from P1 in Table 2-3 and running along the geodesics sequentially connecting the eight points. Coordinates have been provided in the original GDA94 DMS format and converted to GDA2020 DD format.

Point	Latitude (DMS)*	Longitude (DMS)*	Latitude (DD)**	Longitude (DD)**
P1	38° 58′ 2.23″ S	147° 41′ 8.14″ E	-38.9673	147.6856
P2	38° 56′ 14.86″ S	147° 47′ 34.81″ E	-38.9375	147.793
P3	38° 55′ 37.27″ S	147° 53′ 46.07″ E	-38.927	147.8961
P4	39° 0′ 44.84″ S	148° 0′ 28.39″ E	-39.0125	148.0079
P5	39° 1′ 17.62″ S	147° 59′ 47.07″ E	-39.0216	147.9964
P6	39° 0′ 11.14″ S	147° 50′ 6.63″ E	-39.0031	147.8352
P7	38° 59′ 42.82″ S	147° 47′ 59.36″ E	-38.9952	147.7998
P8	38° 58′ 41.77″ S	147° 43′ 25.76″ E	-38.9783	147.7238
Floating LiDAR buoy (activity site)			-38.9737	147.8590

*GDA94

**GDA2020

Table 2-3 High Sea Wind feasibility licence area (Feasibility Licence FL-002) and floating LiDAR buoy coordinates within the Gippsland declared area (OEI-01-2022)



Point	Latitude	Longitude	Point	Latitude	Longitude
P1	-38.967	147.686	P6	-38.997	147.835
P2	-38.074	147.794	P7	-37.005	147.800
P3	-38.074	147.896	P8	-37.022	147.724
P4	-38.988	148.008	FLiDAR	-38.974	147.859
P5	-38.978	147.996			

Figure 2-1 Location of the High Sea Wind feasibility licence area within the Gippsland declared area

2.4 Layout of licence infrastructure

Figure 2-1 shows the location of the floating LiDAR buoy (activity site) within the High Sea Wind feasibility licence area. Figure 2-2 and Figure 2-3 show the proposed infrastructure of the project at this stage. This infrastructure comprises the floating LiDAR buoy and the mooring equipment.

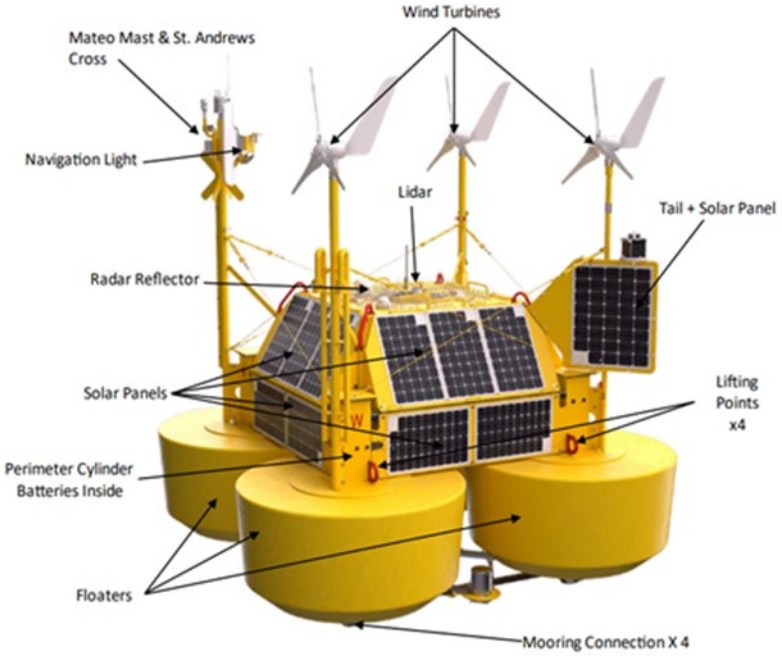


Figure 2-2 Representation of a floating LiDAR buoy (EOLOS FLS200)

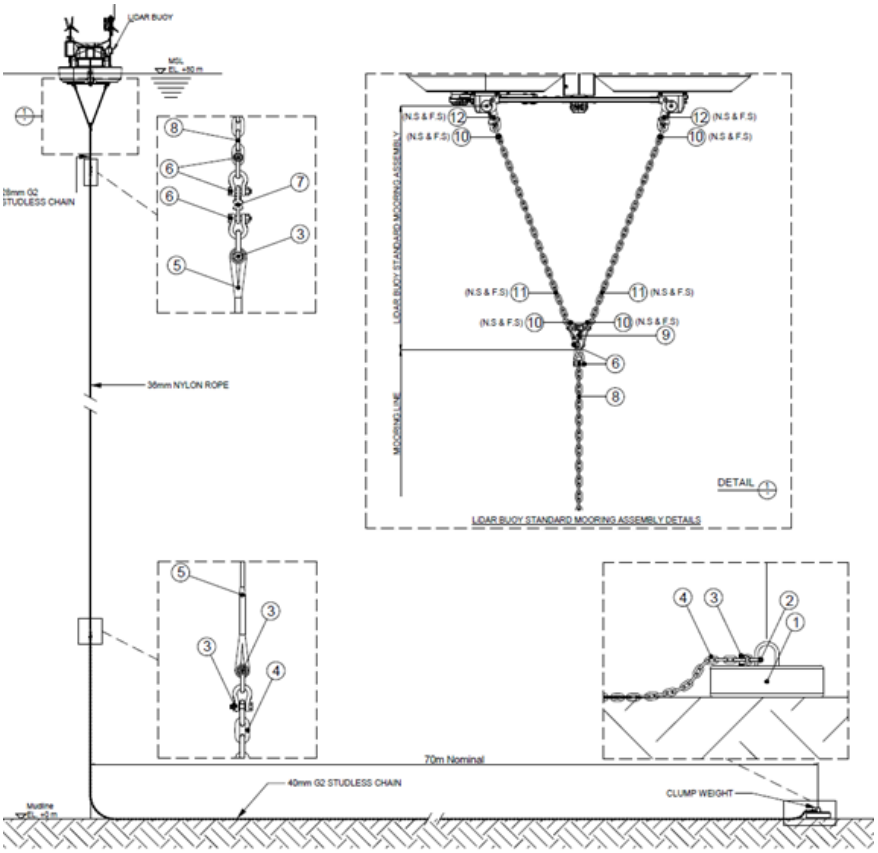


Figure 2-3 Representation of the floating LiDAR buoy mooring configuration

2.5 Operational details

2.5.1 Mobilisation and deployment

2.5.1.1 Mobilisation to and from the activity site

Mobilisation to and from the activity site is not considered a regulated activity under the OEI Act, therefore, this section provides only contextual information.

The floating LiDAR will be mobilised to site via a twin-screw tug cargo vessel departing from Port of Burnie or Port Welshpool towing the buoy to the pre-determined location (Table 2-3) within the feasibility licence area and the buoy being tethered to the seabed. The following steps will be taken to mobilise:

- Installing the keel onto the LiDAR buoy. This is considered the preliminary step in making the vessel and related plant and equipment operational for the wind resource and metocean monitoring
- Transport LiDAR buoy to the wharf via truck
- Lift LiDAR buoy to the water (crane lifting activities)
- Prepare the vessel for deployment and towing
- Tow the LiDAR buoy to deployment location
- Deploy LiDAR buoy (refer sections below)

- Return to port of operations
- Store ancillary equipment and prepare for drifting buoy scenario.

Mooring pre-lay is not relevant since the mooring is deployed at the same time as the floating LiDAR buoy.

2.5.1.2 Tethering / Mooring

The final mooring design is yet to be finalised. TGS will develop:

- Mooring analysis and design report, summarising the design basis and analysis outcomes
- General arrangement drawing, detailing the mooring system, with the final Bill of Materials developed in collaboration with TGS, incorporating TGS experience and supply chain insights.

Whilst the detailed mooring design has not been finalised, an example of a comparable mooring design is provided as Figure 14. Given the final mooring design is likely to be similar to that represented, and it will be validated by the mooring analysis, minor alterations to the design will not affect the management of the activity as described within this plan.

2.5.1.3 Deployment

Once onsite, TGS will assess weather and sea state prior to commencement of the FLS deployment.

The vessel will operate 24-hours, however deck operations are restricted to 12-hours and not usually performed at night (except towing operations) as poor lighting adds risk to the operation.

The floating LiDAR buoy does not need to be and is not designed to be boarded at sea.

2.5.2 Monitoring and maintenance

During operation of the floating LiDAR, the performance and location will be remotely monitored using two Iridium transceivers as primary and secondary telemetry. The floating LiDAR is equipped with several communications systems with internal dataloggers, Wi-Fi and remote satellite transmissions.

To ensure ongoing functionality, and that data is continually being captured, the buoy is serviced at regular intervals throughout the survey program. This involves a service vessel visiting site over a period of hours to undertake inspection and maintenance. Should issues be identified in the LiDAR buoy performance, emergency servicing will occur in accordance with the protocols described in Section 7.

2.5.3 Retrieval

The floating LiDAR contractor (TGS) will demobilise and remove all equipment from the site (including mooring equipment from the seabed) within 30 days of notification of the end of the scope from High Sea Wind.

2.6 Timetable

Table 2-4 provides an overview of the licence activity timetable. Deployment will take a single day assuming fair weather conditions. The buoy is likely to be left in place for 12 to 24 months. Following the completion of the survey all equipment will be removed.

Activity	Indicative start	Indicative duration
Mobilisation and deployment of floating LiDAR	Q4 2025 / Q1 2026	3-5 days
Operation and maintenance of floating LiDAR buoy	Q4 2025 / Q1 2026	12-24 months
Removal of floating LiDAR buoy	TBC pending deployment date and duration	5 days

Table 2-4 Anticipated timing of licence activities

It is planned for a service and maintenance visit after approximately six months of operation. Opportunity or unscheduled visits may be required and will be assessed on an as needed basis. Notifications to the regulator regarding the activity

High Sea Wind will notify the OIR at least 30 days (or another period agreed between the OIR and High Sea Wind) prior to the commencement of the licence activity. (i.e., the deployment of the LiDAR buoy). Should the period between management plan acceptance by the OIR and the schedule deployment of the LiDAR buoy be less than 30-days, HSW will notify the OIR in writing to seek agreement for a reduction in the 30-day notice period.

High Sea Wind will notify the OIR of the proposed activity completion no more than 30 days after the completion of the licence activity (following recovery of the buoy).

Notification and reporting requirements relevant to the licence activity are summarised in Table 2-5.

Reporting requirement	Details of report / notification	Form and timing of notification
OIR – OEI Regulation 161: structural integrity	Notification and reporting of a circumstance that significantly impaired, or has the potential to significantly impair, the operation or structural integrity of licence infrastructure.	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.
OIR – OEI Regulation 161: work, health and safety	Notification and reporting of notifiable incidences under the WHS Act, including the death of a person, a serious injury or illness of a person or a dangerous incident.	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.
OIR – OEI Regulation 161: vessel collision	Notification and reporting of any incident that involves a collision between a marine vessel and any licence infrastructure.	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.
OIR – OEI Regulation 161: safety or protection zone breach	Notification and reporting of a contravention, or apparent contravention, of a safety zone or protection zone in effect in relation to licence infrastructure	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.

Reporting requirement	Details of report / notification	Form and timing of notification
OIR – OEI Regulation 161: emergency management	Notification and reporting of any incident that caused the implementation of the emergency response plan.	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.
OIR – OEI Regulation 161: environment	Notification and reporting of an incident that (i) arose in connection with licence activities carried out in the Commonwealth offshore area; and (ii) resulted, or has the potential to result, in a contravention of the licence holder's obligations under the EPBC Act.	Verbal notification to OIR as soon as practicable, with a written report within 48 hours.
DCCEEW – reporting of harm to EPBC Act listed threatened species	Notification of harm or mortality to an EPBC Act listed threatened marine fauna species. This may be caused by the licence activity or may be caused by an unrelated event.	Written notification to DCCEEW as soon as possible.
DCCEEW – reporting of cetacean sightings	Notification of any sightings of cetaceans to DCCEEW and the Australian Marine Mammal Centre.	Written notification to DCCEEW and the Australian Marine Mammal Centre within three months of the sighting
Australian Hydrographic Office and regional ports – Notice to Mariners	Official notification issued to mariners to provide information regarding navigational safety, including changes to navigational aids and hazards that may affect maritime operations.	Notification to Port Harbor Master once details of event (dates, timing and location) are known.
Director of National Parks – Incidences which occur within a marine park or are likely to impact on a marine park.	For any impacts to marine national parks, the Director of National Parks would be informed via the Marine Compliance Duty Officer.	As soon as possible via the Marine Compliance Duty Officer.

Table 2-5 Reporting requirements relevant to the licence activity

3. Consultation

3.1 Overview of consultation

Early engagement with stakeholders about the High Sea Wind project commenced in 2024 and focused on introducing the project, identifying partnership opportunities and determining the appropriate approvals pathways.

Consultation regarding the activities relevant to the management plan has been ongoing since June 2025. This consultation has focused on introducing the floating LiDAR activity and seeking feedback from consultees on this activity and their interest in the project.

For the purposes of consultation for the management plan, the project made a distinction between consultees – who are required by legislation to be consulted about the proposed activity – and stakeholders:

- **Consultees** are a subset of stakeholders that are required by legislation to be consulted in preparation of the management plan.
- **Stakeholders** are defined as Persons, organisations, communities or groups that fall within the scope of the stakeholder engagement strategy collectively. They may be interested or potentially affected by the High Sea Wind project but are unlikely to be affected or interested in the feasibility activity detailed within the management plan.

High Sea Wind took a broad approach to consultee identification to capture any potential consultees and allow them to opt out of future communications if not interested in receiving project information.

Consultation involved providing information letters to persons, organisations, communities and groups identified as being relevant to the floating LiDAR activity. Letters were tailored to the potential impacts to consultee activities and their interests and requested consultees respond to High Sea Wind to inform the project of any potential impacts of the activity on their operations, or any interest or concerns they may have. Consultation also included meetings, phone calls and follow up emails. Consultation for this activity included context as to how this activity fits within the broader survey program for High Sea Wind but did not include specific information on any subsequent project activities.

Any adverse impacts identified by consultees in this consultation are considered claims. Where consultees raised a claim regarding the activity, High Sea Wind provided a response addressing the claim, explaining why it was or was not considered to be a credible outcome of the effects of the activity and describing any actions the project has or will take to address the claim.

Factsheets were also provided to stakeholders during the consultation period to introduce the project, raise awareness of the management plan activity and future activities, and allow stakeholders to identify themselves or others as potential consultees.

High Sea Wind will continue to engage with consultees, keep stakeholders informed, where relevant, and maintain open feedback channels throughout the floating LiDAR

survey program and subsequent activity. Any feedback received following submissions of the management plan will be considered as per the claims assessment process and addressed as required.

3.2 Activity subject to consultation

Chapter 4, Division 1, part 113 of the OEI Act states:

> *A licence holder that proposes to construct, install, commission, operate, maintain or decommission offshore infrastructure must have a management plan for the licence.*

The activity subject to consultation as part of the management plan is wind resource and metocean monitoring using a floating LiDAR buoy within feasibility licence area FL-002. As this equipment is required to be tethered to the seabed, a management plan is needed. Consultation in relation to the management plan therefore relates exclusively to the installation and operation of the floating LiDAR buoy.

3.3 Who is to be consulted and manner of consultation

Under Regulation 64, the licence holder must make reasonable efforts to identify and consult with those listed in Table 3-1.

Regulation 65 states that for the purpose of the consultation, the licence holder must give each person, organisation, community or group being consulted sufficient information to allow an informed assessment of any reasonably foreseeable effects that the activities subject to consultation may have on the consultees listed in Table 3-1.

Under section 6 'Conditions' of the Offshore Electricity Infrastructure (Declared Area OEI 01 2022) Declaration 2022, the conditions listed in Table 3-2 must be met by the licence holder when preparing a management plan for a licence.

Regulation	Consultee
Regulation 64(1)(a) and Regulation 65(1)(a)	Each Department of State, agency or authority of the Commonwealth, a State or a Territory that has functions that relate to the activities subject to consultation.
Regulation 64(1)(b) and Regulation 65(1)(b)	Aboriginal or Torres Strait Islander people or groups that the licence holder reasonably considers may have native title rights and interests (within the meaning of the Native Title Act 1993) in relation to: • (i) the licence area; or • (ii) areas of land or water that are adjacent to the licence area.
Regulation 64(1)(c) and Regulation 65(1)(c)	Aboriginal or Torres Strait Islander organisations that are established under a law of the Commonwealth, a State or a Territory and that the licence holder reasonably considers to have functions related to managing, for the benefit of Aboriginal or Torres Strait Islander people: • (i) land or water in the licence area; or • (ii) areas of land or water that are adjacent to the licence area.
Regulation 64(1)(d) and Regulation 65(1)(d)	Aboriginal or Torres Strait Islander organisations or groups that the licence holder reasonably considers to be parties to agreements related to land and water rights for Aboriginal or Torres Strait Islander people under the Native Title Act 1993 or any law of a State or Territory, where the land or water rights relate to:

Regulation	Consultee
	• (i) land or water in the licence area; or • (ii) areas of land or water that are adjacent to the licence area.
Regulation 64(1)(e) and Regulation 65(1)(e)	The holder of any other licence granted under the Act where: • (i) the licence area of the other licence covers wholly or partly the same area as the licence area of the relevant licence; or • (ii) there is licence infrastructure in relation to the other licence in or near the licence area of the relevant licence
Regulation 64(1)(f) and Regulation 65(1)(f)	People or organisations that the licence holder reasonably considers may, in or near the licence area of the relevant licence, carry out activities: • (i) for a commercial purpose; and • (ii) under a licence or permit (however described) issued under a law of the Commonwealth or a State or Territory; and • (iii) in a way that may directly interact with the activities subject to consultation.
Regulation 64(1)(g) and Regulation 65(1)(g)	Communities: • (i) that are located adjacent to the licence area; and • (ii) that the licence holder reasonably considers may be directly affected by the activities subject to consultation.
Regulation 64(1)(h) and Regulation 65(1)(h)	Any organisation representing recreational fishers whose activities the licence holder reasonably considers may be directly affected by the activities subject to consultation.

Table 3-1 Regulation 64 and Regulation 65

Item	Conditions
1	The licence holder must: a. in preparing a management plan for the licence, consult with the Department of Defence to determine the potential impact of offshore infrastructure activities and other activities that are to be carried out under the licence on Defence operations and radar capability; and b. in the management plan for the licence, address the outcomes of this consultation.
2	The licence holder must: a. in preparing a management plan for the licence, consult the following: (i) the Bureau of Meteorology; (ii) the Director of National Parks; (iii) the Australian Maritime Safety Authority; (iv) titleholders of any existing petroleum or greenhouse gas titles issued under the Offshore Petroleum and Greenhouse Gas Storage Act 2006 whose title area overlaps with the licence area; and b. in the management plan for the licence, address the outcomes of this consultation.
3	The licence holder must: a. in preparing a management plan for the licence, consult: (i) in the case of a concession or permit holder that has nominated a representative organisation for the purposes of the consultation—the representative organisation; and (ii) in any other case—the concession or permit holder; and

Item	Conditions
	b. in the management plan for the licence, address the outcomes of this consultation, including how impacts on these holders may be avoided, mitigated, or offset.

Table 3-2 OEI 01 2022 Declaration 2022 Consultation Conditions

3.3.1 Identification of consultees

To meet the requirements of regulations 64 and 81, High Sea Wind conducted a multi-step process to identify potential consultees relevant to the management plan activity.

Through the identification process outlined in this section, High Sea Wind identified any persons, organisations, communities and groups that may have any interest in the activities or may be impacted by the activities under the management plan.

High Sea Wind took a broad approach to consultee identification in order to capture any potentially relevant consultees. The broad approach also captured stakeholders that may not have a specific interest in these activities; however, it allowed High Sea Wind to identify and inform these stakeholders that may have an interest in the broader project or may be impacted by future project activities.

The approach provided consultees with the opportunity to opt out of future communications if not interested in receiving information relating to the LiDAR activity or project, and to provide High Sea Wind with information on how and when they would like to be engaged during future consultation rounds during the development of the project activities. This information was captured in the Stakeholder Management Database and will be referred to in future consultation to ensure that High Sea Wind's approach to consultation is responsive and tailored to consultees.

3.3.1.1 Identifying adjacent consultees

Consistent with OEI Regulation 64(1) and Regulation 81(2), HSW applied a two-step screen to identify consultees who are 'adjacent' to the High Sea Wind feasibility licence area (FL-002), taking into account the scale and nature of this licence activity (temporary, low impact metocean investigations including a Floating LiDAR and vessels supporting the regulated activity).

Step 1 – Geographic and functional screen

Geographic adjacency:

In the literal sense of the term, consistent with the Oxford English Dictionary, only those consultees who are located, or have rights or functions over land or water, next to or very near the regulated activity i.e., those neighbouring; bordering, contiguous, adjoining; or within the High Sea Wind licence area (FL-002) are considered 'adjacent'.

For context, the approximate distances from the activity site (floating LiDAR location) to key Victorian and Tasmanian jurisdictional locations are:

- McGaurans Beach 87 km
- Rag Island 98 km
- Wilsons Promontory Lighthouse 123 km
- Hogan Island Group 76 km

- Deal Island 69 km
- Flinders Island (north) 74 km
- Victorian State waters 69 km
- Tasmanian State waters 60 km

Functional remit: Bodies with statutory or recognised functions relating to waters contiguous with or adjoining the FL-002 (e.g. maritime safety, national parks, fisheries management, environmental regulators, defence, ports) and Traditional Owner organisations with statutory roles over areas of land or water adjacent to FL-002, i.e., those next to or very near the regulated activity.

Step 2 – Pathway and threshold screen

Given the terms 'next to' and 'very near' are relative and open to interpretation, for each potentially adjacent party, we assessed whether the physical presence of the floating LiDAR buoy and mooring equipment could create a specific, plausible, and negative effect pathway at the relevant distance, including potential impacts to:

- Visual amenity of communities.
- Navigation and safety of other marine users.
- A commercial licenced activity that may directly interact with the LiDAR buoy and mooring equipment.
- Cultural heritage values; or
- Native title rights, and/or organisations whose functions relate to managing, for the benefit of Traditional Owners.

3.3.1.2 Traditional Owner engagement

Regulation 64(1)(b, c, and, d) and Regulation 65(1)(b, c, and d) refer to: (i) land or water in the licence area; or (ii) areas of land or water that are adjacent to the licence area when considering Aboriginal or Torres Strait Islander (Traditional Owner) people, organisations or groups.

Given the open-ocean location of the FL-002 with a distance to nearest shoreline on the Victorian mainland from the northern FL-002 boundary being approximately 76 kilometres, High Sea Wind does not consider any land to be adjacent to the licence area. Likewise, given the northern boundary of FL-002 is approximately 70km from Victorian State jurisdiction, and the southern boundary approximately 60km from Tasmanian State jurisdiction, High Sea Wind does not consider any State waters to be adjacent to the licence area. As such, for this regulated activity, no traditional owner groups were considered to be 'adjacent', however, this does not preclude those groups from being considered 'adjacent' for future regulated activities.

From the perspective of potential visual impacts to communities, including Traditional Owner communities, the floating LiDAR is located beyond the visual acuity of any communities on State lands or within State waters. Further, the activity site is beyond known areas of active use or traditional fishing activity.

HSW acknowledges that Commonwealth waters may have been used historically by multiple First Peoples groups. For this specific licence activity, and consistent with cultural protocols, HSW is engaging with Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) as RAP adjacent to the proposed activities. Should the scope, location or risk profile change, or should GLaWAC recommend additional parties, HSW

will extend consultation accordingly. GLaWAC was notified of the proposed activities and raised no concerns.

3.3.1.3 Consultee identification process

The process for identifying persons, organisations, communities and groups to be consulted with regarding the floating LiDAR activity is described in Table 3-3.

	Step	Description
1	Consider consultees identified by legislation / have identified functions	The project reviewed all categories and groups identified in Regulation 64(1) of the Offshore Electricity Infrastructure Amendment Regulations 2024. Additionally, consultees required to be consulted under Condition 3 of Feasibility Licence FL-002 were also considered
2	Define geographic extent / adjacency to regulated activity or potential to be affected by the activity	To narrow down the potential consultees identified in Step 1, the project considered the potential impacts and extent of impacts of the activity. This was not limited to consultees with activities within the FL-002 licence area but considered their proximity to the licence area and potential wider impacts of the activity on the consultee's activities or interests.
3	Review constraints analysis	The project constraints analysis identifies stakeholders potentially impacted by project activities. This analysis was reviewed and relevant consultees not previously identified were included in the list. Offshore constraints identified for the FL-002 licence area are: • Shipping movements • Biologically important areas • OEI Department of Defence consultation area • Commercial fishers (especially shark gillnet sector) • Petroleum titleholders
4	Consider available data and resources	Desktop research was undertaken to identify additional consultees not captured in the above steps. Sources included community directories, special interest groups, EPBC Act referrals, NEATs public portal, policy submissions and government databases.
5	Seek external input	During the consultation period, the project sought feedback from consultees on the identification of additional consultees relevant to their areas. This included seeking feedback from representative bodies such as the South East Trawl Fishing Industry Association (SETFIA) and Lakes Entrance Fishing Co-op regarding fishers and specialist consultants regarding Traditional Owner consultation to ensure these groups have been appropriately engaged. Information was also provided to communities at information sessions to allow individuals and groups to self-identify as consultees.
6	Refine consultee list	Once the initial list of consultees was created, the project refined the list and identified the potential interest or impact from the activity to determine the appropriate consultation approach. The list of consultees will continue to be refined in future project phases.
1	Consider consultees identified by legislation / have identified functions	The project reviewed all categories and groups identified in Regulation 64(1) of the Offshore Electricity Infrastructure Amendment Regulations 2024. Additionally, consultees

	Step	Description
		required to be consulted under Condition 3 of Feasibility Licence FL-002 were also considered

Table 3-3 Process of consultee identification

Section 3.3 describes why each consultee was identified as being relevant and provides details on the consultation undertaken, information provided, and the period of consultation.

Through this process, High Sea Wind developed a list of stakeholders that are not considered consultees for the purposes of the management plan but are relevant for wider project engagement and future activities.

3.3.2 Sufficiency of information provided

Once a full list of consultees and other stakeholders was identified, High Sea Wind categorised them into four groups to target consultation efforts and provide tailored and sufficient information to all stakeholders.

The four stakeholder categories identified for the purposes of the licence activity are outlined in Table 3-4, with further information about these groups and the information provided.

Category Number	Category	Description	Information provided	Other engagement
1	Fishers	Fishing representative bodies and groups representing fishers that are likely to have some fishing effort in the project licence area	• Project fact sheet • Letter 1 – fishers • Project introduction and timeline • Floating LiDAR overview and coordinates • Coexistence with fishers • Commitment to consultation (with fishers) • Stakeholder identification process • How to provide feedback	• Meeting with SETFIA to understand fishing effort, consultation and notification opportunities with fishers. • Phone calls with fishing representative groups including ComFish and Lakes Entrance Fishing Cooperative.
2	Other marine users	Other marine users that are known to have an interest in the licence area, including Traditional Owners	• Project fact sheet • Letter 2 – other marine users • Project introduction and timeline • Floating LiDAR overview and coordinates • Controls to manage impacts to other marine users	• Industry events • Participation in Offshore Gippsland Developers (OGD) wind industry meetings and joint engagement • Early engagement with Gunaikurnai Land and Waters Aboriginal

Category Number	Category	Description	Information provided	Other engagement
			• Why you have been identified as a stakeholder • How to provide feedback	Corporation (GLaWAC)
3	Interested project consultees	Other consultees that may carry out activities in the area, including other fishers and representative bodies, petroleum and offshore licence holders and federal departments with functions related to the activity	• Project fact sheet • Letter 3 – interested project consultees • Project introduction and timeline • Floating LiDAR overview and coordinates • Stakeholder identification process • Why you may be a relevant stakeholder • How to provide feedback	• Early engagement with the Offshore Infrastructure Regulator (OIR) to introduce High Sea Wind and the project. • Early engagement with First Peoples – State Relations to discuss engagement approach with Traditional Owners and upcoming FLiDAR and G&G activity. • Industry events • OGD community days • Webpage
4	General stakeholders	Other stakeholders that are unlikely to be impacted or interested in the floating LiDAR activities specifically, but may have a general interest in the project or offshore wind in Gippsland, such as local councils, ports, regional development groups and research organisations	• Project fact sheet	• Industry events • OGD community days • Webpage

Table 3-4 Groups contacted regarding the licence activity

3.3.3 Reasonable period for consultation

High Sea Wind has ensured a reasonable timeframe was provided for consultees to engage with the project and participate in consultation. All consultees were requested to provide feedback within 30 days of receiving the initial email and letter. Where no response was received after 30 days, follow up emails or phone calls were made to stakeholders.

Although consultees were requested to respond within 30 days, High Sea Wind allowed over 60 days between when the initial letters were issued and when this document was finalised. This allowed for consultees who may require more time to adequately consider the proposed activities and respond.

Any feedback received following the submission of the management plan or during the management plan activity will be considered and addressed. This feedback will be part of ongoing consultation for the project and part of future management plan updates if relevant.

3.3.4 List of consultees

High Sea Wind identified 53 regional consultees, however relevant to the floating LiDAR activity there were 9 consultees identified as potential to be impacted. While the FLIDAR deployment directly affects a limited group of stakeholders, our engagement approach intentionally extended beyond those with direct impacts. This broader engagement aimed to foster transparency, build early relationships, and enhance understanding of offshore wind activities within the region.

The following tables include a summary of consultation with these consultees, including why they were initially engaged, even if not considered adjacent to the regulated activity.

In addition to the 53 consultees, an additional 30 stakeholders were identified. The regulations did not require that the project consult with these stakeholders regarding the activity, however, High Sea Wind contacted these stakeholders during the consultation period to introduce the project and provide a high-level overview of upcoming activities.

3.3.4.1 Departments of State, agency or authority of the Commonwealth, a State or a Territory

Departments of State, agency or authority of the Commonwealth, a State or a Territory that have functions that related to the activities subject to consultation are listed in Table 3-5.

Consultee	Why consultee engaged	Information provided	Response received?
Australian Hydrographic Office (AHO)	Part of Department of Defence. Interested in defence implications and development of nautical charting. Potential interaction with AHO activity in the area.	The other marine users letter (2) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes
Victorian Fisheries Authority (VFA)	Interested in any activities that affect day to day fishing operations or have direct interaction with commercial fisheries. Particular interest in shark gillnet sector impacts for this activity. Potential to seek feedback on other relevant stakeholders.	The fishers letter (1) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • coexistence with existing fishing operations • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide to provide feedback.	Yes
Gippsland Ports Authority	Interested in vessel activities and opportunities for Gippsland ports to support project	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls	No

Consultee	Why consultee engaged	Information provided	Response received?
		• information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	
Department of Climate Change, Energy and the Environment and Water (DCCEEW)	Interested in Biologically Important Areas (BIAs) and any equipment that may be left in situ. Interested in cumulative impact of activities, environmental assessments and development of detailed design and operational plans.	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes
Australian Fisheries Management Authority (AFMA)	Interested in any activities that affect day to day fishing operations or have direct interaction with commercial fisheries. Particular interest in shark gillnet sector impacts for this activity. Potential to seek feedback on other relevant stakeholders.	The fishers letter (1) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • coexistence with existing fishing operations • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide to provide feedback.	Yes
Offshore Infrastructure Regulator (OIR)	Consultation occurring through the management plan initial meetings	The other marine users letter (2) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders	Yes

Consultee	Why consultee engaged	Information provided	Response received?
		• how and when to provide feedback.	
Heritage Victoria	Heritage Victoria was not considered a consultee for floating LiDAR activity due to the activity limited to Commonwealth Water. However, Heritage Victoria has been added to the consultee list due to their claim status.	The project fact sheet with information on the project and high-level information on upcoming FLiDAR activity.	Yes

Table 3-5 Consultees under Regulation 64 (1)(a)

3.3.4.2 Aboriginal or Torres Strait Islander people or groups

Aboriginal or Torres Strait Islander people or groups required to be consulted under Regulation 64(b), Regulation 64(c) and Regulation 64(d) include:

- Aboriginal or Torres Strait Islander people or groups that the licence holder reasonably considers may have native title rights and interests
- Aboriginal or Torres Strait Islander organisations that are established under a law of the Commonwealth, a State or a Territory
- Aboriginal or Torres Strait Islander organisations or groups that the licence holder reasonably considers to be parties to agreements related to land and water rights.

Consultees under this regulation are listed in Table 3-6.

Consultee	Why consultee engaged	Information provided	Response received?
Gunaikurnai Land and Waters Aboriginal Corporation	HSW recognises and respects Victoria's Registered Aboriginal Party (RAP) system. Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) is the RAP for the landfall area and adjacent State waters (to 3 nautical miles). Whilst no adverse impacts have been identified for Victorian State land and waters from this activity, and by virtue no identified impacts to communities, consistent with Victorian protocols, HSW has engaged through GLaWAC as the primary pathway, and sought GLaWAC's advice on whether other First Peoples organisations should be engaged for this and future activities.	The other marine users letter (2) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes

Table 3-6 Consultees under Regulation 64(b), Regulation 64(c) and Regulation 64(d)

3.3.4.3 The holder of any other licence granted under the Act

Holders of other licences under the Act that were consulted are listed in Table 3-7.

Consultee	Why consultee engaged	Information provided	Response received?
Gippsland Skies Pty Ltd	Nearby offshore wind title holder may have potentially interaction with the regulated activity	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed	Yes
Blue Mackerel North Pty Ltd			Yes
Southerly Ten 0 Star of the South and Kut-Bratualung			Yes

Consultee	Why consultee engaged	Information provided	Response received?
Ørsted Offshore Australia 1 Pty Ltd (Gippsland 01 and 02)		• navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes
Iberdrola Australia OW 2 Pty Ltd (Aurora Green)			Yes
Gippsland Dawn OWP Project Pty Ltd (Gippsland Dawn)			No
Navigator North Project Pty Ltd			Yes
Kent Offshore Wind Pty Ltd			Yes
Great Eastern Offshore Wind Farm Project Co Pty Ltd.			Yes

Table 3-7 Consultees under Regulation 64(e)

3.3.4.4 People or organisations that the licence holder reasonably considers may, in or near the licence area of the relevant licence, carry out activities

People or organisations that the licence holder reasonably considers may, in or near the licence area of the relevant licence, carry out activities are listed in Table 3-8.

Consultee	Why consultee engaged	Information provided	Response received?
Abalone Victoria	Limited in interest in FLiDAR as abalone fishing is concentrated closer to shore	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	No
Lakes Entrance Fishers Co-op	Limited interest in FLiDAR because estuarine fishing is located closer to shore		Yes
Tuna Australia	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.		Yes
Corner Inlet Fisheries Habitat Association	Limited interest in FLiDAR bays and estuarine fishing is located closer to shore		Yes
Future Fish Foundation	General interest in project and impact on recreational		No

Consultee	Why consultee engaged	Information provided	Response received?
	fishing and promotion of fishing		
Australian Southern Bluefin Tuna Industry Association	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.	The fishers letter (1) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • coexistence with existing fishing operations • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide to provide feedback.	Yes
Commonwealth Fisheries Association	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.		Yes
Seafood Industry Australia	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.		No
Seafood Industry Victoria, including Scallop Fisherman's Association	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.		Yes
South East Trawl Fishing Industry Association and Southern Shark Industry Alliance	Potential impact to commercial fishing in project area. General interest about the project, project activities and potential impacts, mitigations and compensation.		Yes
Esso Australia Resources Pty Ltd	Nearby petroleum title holder potentially with overlapping activity	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders	Yes
Fisheries Research and Development Corporation	General interest in project and wind farm development impact on local fishing, engagement with other fishers		
Carnarvon Hibiscus Pty Ltd	Interested in offshore energy infrastructure and potential overlap with operations		No
Amplitude Energy			Yes
Emperor Energy Limited			No

Consultee	Why consultee engaged	Information provided	Response received?
Liberty Petroleum Corporation		• how and when to provide feedback.	No
MEPAU A Pty Ltd			No
Woodside Energy (Bass Strait) Pty Ltd			Yes
Santos Offshore Pty Ltd			Yes
SGH Energy VICP54 Pty Ltd			No
Shelf Oil Pty. Ltd.			No

Table 3-8 Consultees under Regulation 64(f)

3.3.4.5 Communities

No community consultees under Regulation 64(g) were identified for the floating LiDAR buoy deployment. However, community engagement was undertaken during the consultation period at three Gippsland Offshore Wind Days where High Sea Wind project representatives were available to answer questions and provide copies of the project fact sheet. These community events were held on 23 July in Toora, 30 July at Loch Spot and 31 July at Woodside.

The information provided in the fact sheet included:

- Timeframes
- Equipment proposed
- How to provide feedback and nominate as a consultee.

Project information was also made available on the High Sea Wind webpage.

3.3.4.6 Recreational fishers

Organisations representing recreational fishers whose activities the licence holder reasonably considers may be directly affected by the activities subject to consultation are listed in Table 3-9.

Consultee	Why consultee engaged	Information provided	Period of consultation	Response received?
Australian National Sportfishing Association	Interest in restrictions on fishing activity and operations in	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes	High Sea Wind requested feedback within 30 days of the initial email and letter being sent.	No
Australian Recreational				No

Consultee	Why consultee engaged	Information provided	Period of consultation	Response received?
Fishing Foundation	the project area	• the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.		
Boating Industry Association of Victoria				Yes
Victorian Game Fishing Association			Stakeholders were identified during the consultation period and consulted in late August, however, multiple attempts were made. HSW will consider any feedback or claims made by these stakeholders if they arise after the end of the consultation period.	Yes
South Gippsland Game Fishing Club				No
VR Fish	Interest in restrictions on fishing activity and operations in the project area. Interested in appropriate engagement of Gippsland fishers	The fishers letter (1) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • coexistence with existing fishing operations • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide to provide feedback.	High Sea Wind requested feedback within 30 days of the initial email and letter being sent.	No

Table 3-9 Consultees under Regulation 64(h)

3.3.5 Consultees under Condition 3 under Feasibility Licence FL-002

Additional consultees required under FL-002 are listed in Table 3-10.

Consultee	Why consultee engaged	Information provided	Response received?
Australian Maritime Safety Authority (AMSA)	High level of interest in any impact to safe navigation of commercial shipping, establishing navigation including buoys, beacons and radar. Interested in development and outcomes of the Shipping and Navigation Technical Report.	The other marine users letter (2) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes
CarbonNet	Nearby title holder potentially with overlapping activity		Yes
Bureau of Meteorology (BoM)	Input required	The interested project consultees letter (3) detailed key information about the floating LiDAR survey, including: • timeframes • the buoy location • equipment proposed • navigational and safety controls • information as to why they had been identified as a stakeholder • request to nominate other relevant stakeholders • how and when to provide feedback.	Yes
Director of National Parks (DNP)	National Parks should be consulted if the activities fall within marine park or have potential to impact marine park or surrounding waters. Impact is expected to be minimal for FLiDAR activity. Nearby parks: Wilsons Prom Marine Park, East Gippsland Marine Park and Beagle Marine Park.		Yes
Department of Defence (DoD)	Department of Defence overlaps with the project area and therefore engagement is required to understand and mitigate impacts of any activity.		No

Table 3-10 Consultees under Condition 3 of FL-002

In addition, other stakeholders were provided information about the management plan activity due to their potential interest in offshore wind activities in the region. These stakeholders were not required to be consulted under the OEI regulations but have been listed in Table 3-11.

Stakeholder category	Stakeholder
Australian government	• Commonwealth Scientific and Industrial Research Organisation (CSIRO) • Ocean Wind Energy Victoria (OWEV) • Civil Aviation Safety Authority (CASA) • Regional Development Australia • National Offshore Petroleum Titles Administrator (NOPTA)

Stakeholder category	Stakeholder
Victorian government	• Department of Energy, Environment and Climate Action (DEECA) • VicGrid • EPA Victoria • West Gippsland Catchment Management Authority • First Peoples – State Relations • Heritage Victoria • Parks Victoria
Local government	• Latrobe City Council • South Gippsland Shire Council • Wellington Shire Council
Ports	• Port of Hastings • Ports Australia • Port Anthony Marine Terminal • Port of Melbourne • Geelong Port
Community and economic development	• One Gippsland • Committee for Gippsland
Education	• Federation University • TAFE Gippsland • Monash University
Other	• 3D Oil Limited • Shipping Australia • AusNet Services • Conoco Phillips

Table 3-11 Stakeholders consulted as part of the management plan activity

3.4 Consultation carried out

This section summarises how the management plan addresses the requirements under Regulation 81.

3.4.1 Process of identification and consultation methods

3.4.1.1 Process of consultee identification

A detailed description of the consultee identification process is outlined in Section 3.3.

3.4.1.2 Consultation mechanisms

High Sea Wind used a range of mechanisms to contact consultees and communicate information about the project. A summary of communication mechanisms used is included in Table 3-12.

Method	Description
Letters	Detailed letters about the deployment of the floating LiDAR buoy including an introduction to the project, description of the floating LiDAR activity and

Method	Description
	location, navigational and safety considerations, overview of stakeholder identification process and information on how to provide feedback on the activity.
Emails	Electronic correspondence with stakeholders, including sharing of documents such as letters and fact sheets.
Phone calls	Two-way conversations with stakeholders to support consultation and clarify or provide additional information.
Meetings	Online and face-to-face meetings with stakeholders to discuss project activities, develop relationships, address concerns and feedback and
Fact sheets	Printed or digital information sheets explaining and illustrating key elements of the project and potential impacts in simple, accessible terms. Used to support engagement with general project stakeholders.
Project webpage	A dedicated webpage on the Ocean Winds website that includes an overview of the High Sea Wind project, upcoming engagement opportunities, links to the project fact sheet and floating LiDAR buoy information sheet and contact information. The Stakeholder Engagement Strategy (SES) and the management plan summary will be published on this webpage.
OGD community pop ups	In person presence at community events and wind industry forums. Opportunity to speak with communities and other stakeholders and raise awareness about the project. Pop ups that coincide with the floating LiDAR consultation period are: • Developer Community Day, Toora, 23 July 2025 • Developer Community Day, Loch Sport, 30 July 2025 • Developer Community Day, Woodside, 31 July 2025.
Project inbox	A generic project email address, published on the website and in communications and engagement materials. Allow stakeholders to contact project directly.

Table 3-12 Mechanisms used to consult on the management plan activity

Project information and general information on the floating LiDAR activity was available to stakeholders via a fact sheet on the project webpage and available at the OGD community pop ups. All stakeholders were able to contact the project via the project phone line and inbox.

Consultees and general stakeholders were contacted directly by the project for the management plan consultation. Timing and management of this is described in Table 3-13.

Timeframe	Consultees	General stakeholders
Late June	Email with letter tailored to their interest	Email with floating LiDAR fact sheet
Late July	Email with letter	Email with attached fact sheet
Mid-August	Phone call to confirm email was received and follow up on any response	
Ongoing	Acknowledge responses Provide responses to simple questions Acknowledge claims or complex enquiries and respond to consultee or stakeholder once information is available	

Timeframe	Consultees	General stakeholders
	Record all interactions in Stakeholder Management Database.	

Table 3-13 Consultation process description

3.5 Report on outcomes of consultation

3.5.1 Claims assessment process

High Sea Wind will use a standardised process to assess stakeholder claims consistently and objectively for each activity across the project activities and manage these claims accordingly.

High Sea Wind applies a structured, two-stage approach to assess and respond to feedback and claims received through consultation, consistent with Regulations 64 and 81(3).

Stage 1 – Classify the submission

Each item of correspondence is reviewed to determine whether it constitutes a claim of adverse impact under Regulation 81(3) or general feedback.

Feedback: comments, requests for updates, or offers of services that do not allege a direct adverse impact.

Claim of an adverse impact: a statement from a consultee identifying a potential adverse effect of this licence activity on their functions, operations or interests.

The classification is recorded in the consultation register. Feedback items are acknowledged and retained for ongoing engagement but are not assessed as claims under Regulation 81(3). The classification process is summarised in Figure 3-1.

Figure 3-1 Submission classification process

Stage 2 – Assess and respond to valid claims
Where a submission is identified as a valid claim, it is assessed using the project's claims assessment matrix, which guides proportional and consistent evaluation across consultees.

Claim is initially assessed through the claims assessment matrix

The stakeholder engagement and planning teams complete an initial assessment of the claim to determine if the claim has merit and then assign a rating to the claim using the project claims assessment matrix outlined in Table 3-14.

The claim is assessed against each question and provided a score based on the response. The number from each column is added together to determine whether the adverse impact to the activity is low, moderate or high.

If the activities aren't impacted, the score remains a 1, with no further scoring required. If a claim rates a 3 or less the adverse impact is considered low with minor adjustments to the activity likely sufficient to manage the impact, ratings between 4-6 are considered to be of moderate adverse impact and may require further engagement with the stakeholder or other mitigation measures implemented, Claims rating above a 6 are deemed to be of high adverse impact with further engagement and mitigation measure implementation likely required to reduce the impact.

A claim is considered to have merit if it relates to:

1.1 a potential adverse impact resulting from the proposed activity, or

1.2 a potential adverse impact on the proposed activity.

Stakeholder	Are the stakeholder activities adversely impacted?	Can the project adjust activity to avoid adverse impact?	Can the stakeholder adjust activity to avoid adverse impact?	How significant is the adverse impact to the stakeholder?
Score	• Can't continue - 3 • Some impact - 2 • No impact - 1	• Unable to adjust - 3 • Would impact activity or outcome - 2 • Easy to adjust - 1	• Unable to adjust - 3 • Would impact activity or outcome - 2 • Easy to adjust - 1	• High • Moderate • Low
Name	*Rating*	*Rating*	*Rating*	*Rating*

Table 3-14 Claims assessment matrix

Claim assessment is reviewed by project technical teams

The claims assessment matrix, rating and justification is reviewed by the project technical teams and contractors or external parties, where required, to confirm the merit assessment and claim rating. The project technical teams will focus on identifying

and mitigating potential impacts of the specific activity. **If claim is considered to have merit, further consultation and discussion with consultee with occur prior to the activity commencing.**

High Sea Wind will provide a response to consultees regarding the assessment of their claim and provide further information, including actions the project will take to minimise or avoid impacts or considerations for the consultee.

Our activity or their activity is modified to minimise impacts

High Sea Wind project activities, or consultee activities, may need to be modified to minimise impacts as identified in the claims assessment process and technical review.

Continue to monitor and work with consultee if required

High Sea Wind will maintain open channels of communication with consultees and other stakeholders throughout all project activities. Where modifications to the project or consultee activities are no longer fit-for-purpose, High Sea Wind will revisit the claim and impacts to identify alternative solutions.

If no response is received during the consultation period after multiple attempts to contact the consultee, High Sea Wind may assess the potential impact to the consultee's activities based on the project's understanding of their operations and may adjust project activities to minimise impacts to these consultees where appropriate.

The claims assessment process will continue to be refined as the project progresses to ensure it is fit for purpose. This will be achieved by monitoring consultee feedback and conducting an engagement-focused lessons learnt workshop at the commencement of the activity.

Table 3-15 provides a summary of the claims raised by various stakeholders in relation to the information provided on the management plan activity. It includes an assessment of the merit of the claim, the measures implemented to address the concern and proposed monitoring activities.

High Sea Wind will continue to assess claims raised by stakeholders throughout the duration of the management plan activities and will assess and address these claims in line with the claims assessment process. This is outlined further in the stakeholder engagement strategy described in Section 4.

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
Australian Hydrographic Office (AHO)	Notify AHO when activity is due to begin. AHO will publish a Notice to Mariners (NtM).	N	N/A – No adverse impact claim	N/A	HSW	HSW will include NtM in project plans. HSW will inform AHO and confirm that a NtM has been issued in the appropriate timeframe prior to commencing any activity.	Notice to Mariners will be provided at least 21 days prior to activity commencement.
Australian Maritime Safety Authority (AMSA)	Activity has potential navigational safety issues for other mariners operating or navigating through the area of proposed activity	Y	4 – Navigational safety risk to other marine users near activity.	• Issue Notices to Mariners ≥14 days before any deployment window. • Maintain AIS transmission and IALA-compliant lighting/marking on FLS/USV at all times. • Provide 24/7 duty phone and JRCC/AMSA contact protocol in the Marine Safety Plan. • Maintain exclusion buffer of [e.g. 500 m] around devices; publish coordinates in AUS charts and on project website.	HSW	HSW to include notification requirement in project plan, including consulting with its vessel contractors to ensure AMSA notices to JRCC are met.	HSW will implement Measures 1–4 for all deployments under the management plan.

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
Seafood Industry Victoria	SIV provided opportunity to engage in a partnership arrangement to notify members of proposed activities	N	N/A – No adverse impact claim	N/A	HSW	N/A	HSW will monitor engagement with SIV and consider their channels for future engagement.
South East Trawl Fishing Industry Association and Southern Shark Industry Alliance	Fishing effort data is not publicly available and there is potential for FLiDAR activity to overlap with fished areas. SETFIA proposed undertaking fishing study to identify whether impacts exist from activity.	Y	5 - HSW has fishing activity reports that provide an indication of fishing activity in the licence area. However, HSW understands some information that SETFIA can provide is not publicly available and therefore is not captured by these preliminary reports. HSW is continuing discussions	HSW is continuing discussions with SETFIA to determine the appropriate services to use ensure HSW has the most accurate information on fishing activity in the licence area. HSW is in discussions with SETFIA to determine how best to inform potentially impacted fishers of activity and intend to enter into an agreement prior to the deployment of the floating LiDAR buoy. HSW is also engaging with other fishing representative bodies and departments, including AFMA, SIV, Tuna Australia and local	HSW	HSW has established a positive relationship with SETFIA and will continue to meet and engage with SETFIA throughout the FLiDAR deployment to identify whether impacts have eventualised or changed.	Formalise a data-sharing arrangement with SETFIA prior to FLiDAR deployment (e.g. through a service or information-exchange agreement) to obtain verified spatial fishing-effort data within and adjacent to the licence area. Validate and cross-check existing fishing-activity mapping using SETFIA data to confirm that the final FLiDAR location and mooring footprint do not overlap with actively fished grounds. Provide SETFIA and relevant fishers with advance notification (minimum 14 days) of all deployment, maintenance, and retrieval

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
			with SETFIA to determine the appropriate services that will enable fishers to be informed of activity and provide HSW with information on fishing activity in the licence area.	organisations to ensure all fishers are represented.			windows, including coordinates and timing, to avoid operational interference. Maintain direct liaison with SETFIA and Lakes Entrance Fishermen's Co-operative through the deployment period to monitor whether any operational interactions occur and to agree any responsive measures if required. Report annually (or at activity completion) to SETFIA on outcomes of liaison, confirming whether any interactions or gear conflicts were reported
Tuna Australia -	Tuna Australia provided the project the opportunity to use its notification system about FLiDAR activities.	N	N/A – No adverse impact claim	N/A	HSW	N/A	HSW will keep Tuna Australia informed of future activities.

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
Director of National Parks (DNP)	Incidences which occur within a marine park or are likely to impact on a marine park should be reported as soon as possible via the 24-hour Marine Compliance Duty Officer.	N	1 – The activity is not proposed to take place within a marine park so no impact.	N/A	HSW	N/A	DNP will be notified of any future activities should they occur or impact a marine park. DNP notified activities aren't taking place in a marine park.
Heritage Victoria	Noted the mooring system for the floating LiDAR buoys should not be placed on any seabed feature that may be a historic shipwreck or other form of underwater cultural heritage.	Y	1- Based on a desktop assessment there are no registered heritage values within the feasibility licence area, including shipwrecks or Cultural Heritage as described in 2.2.4.	Visual inspection of the location will occur prior to the mooring placement to ensure it is a clear sandy area. There is also a 500m buffer allowance for micro siting to avoid any seabed features.	TGS	Location of moorings and nature of seabed to be recorded during deployment and position adjusted accordingly	We will implement measures 1 -2.
Australian Fisheries	Could be potential	Y	4 - HSW considers the	HSW has engaged with fishing representative bodies	HSW	HSW will maintain	Formalise a data-sharing arrangement with SETFIA

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
Management Authority (AFMA)	impacts to Commonwealth fishers from FLiDAR activities		claim to have merit due to the potential impact to stakeholder fishing activity and potential damage to project assets if other marine users are not aware of activity underway in licence area.	- SETFIA, SIV, CFA and Tuna Australia - and will issue a NtM prior to any activity taking place. HSW has an initial fishing activity report for the licence area and is in discussions with SETFIA about commissioning a more detailed report in order to understand fishing activity.		ongoing check-ins with fishing stakeholders and provide advance notice of marine activities, as well as regular updates on the project. Engagement will be tracked through the Stakeholder Management Database.	prior to FLiDAR deployment (e.g. through a service or information-exchange agreement) to obtain verified spatial fishing-effort data within and adjacent to the licence area. Validate and cross-check existing fishing-activity mapping using SETFIA data to confirm that the final FLiDAR location and mooring footprint do not overlap with actively fished grounds. Provide relevant fishers with advance notification (minimum 14 days) of all deployment, maintenance, and retrieval windows, including coordinates and timing, to avoid operational interference. Maintain direct liaison with SETFIA and Lakes Entrance Fishermen's Cooperative through the deployment period to monitor whether any operational interactions occur and to agree any

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
							responsive measures if required.
Lakes Entrance Fishermen's Cooperative	Potential impacts to fishing activities in the area from FLiDAR activities	Y	4 HSW considers the claim to have merit due to the potential impact to stakeholder fishing activity and potential damage to project assets if other marine users are not aware of activity underway in licence area.	HSW will inform stakeholder prior to any activities commencing in licence area by sharing the NtM directly with stakeholder. HSW will include stakeholder in future consultation	HSW	HSW will maintain ongoing check-ins with fishing stakeholders and provide advance notice of marine activities, as well as regular updates on the project. Engagement will be tracked through the Stakeholder Management Database.	Formalise a data-sharing arrangement with SETFIA prior to FLiDAR deployment (e.g. through a service or information-exchange agreement) to obtain verified spatial fishing-effort data within and adjacent to the licence area. Validate and cross-check existing fishing-activity mapping using SETFIA data to confirm that the final FLiDAR location and mooring footprint do not overlap with actively fished grounds. Provide relevant fishers with advance notification (minimum 14 days) of all deployment, maintenance, and retrieval windows, including coordinates and timing, to avoid operational interference. Maintain direct liaison with SETFIA and Lakes Entrance

Consultee	Response details	Adverse impact claim	Rating and Assessment of merit	Measures implemented	Owner	Monitoring and actions	Commitment
							Fishermen's Cooperative through the deployment period to monitor whether any operational interactions occur and to agree any responsive measures if required.

Table 3-15 Summary of claims raised

3.5.1 Consultation records

HSW maintains a full record of consultation undertaken for the floating LiDAR buoy deployment.

3.5.2 Requirement to carry out measures

HSW will implement the obligations and measures to address stakeholder concerns as described in Table 3-15.

4. Stakeholder engagement strategy

Regulation 82(1) states the plan must describe a plan for stakeholder engagement (a stakeholder engagement strategy) that the licence holder will implement to identify and consult with specified persons, organisations, communities and groups (stakeholders) in relation to the licence activities.

High Sea Wind has developed a stakeholder engagement strategy that sets out how the project will continue to identify and engage with stakeholders through the delivery of the management plan activities.

4.1 Description of stakeholder engagement strategy

High Sea Wind has developed a Stakeholder Engagement Strategy (SES) that will guide the project's engagement with stakeholders and consultees identified in the Regulations and licence conditions.

High Sea Wind's engagement approach incorporates industry best practice and Ocean Winds' engagement principles:

- Collaborative
- Clear, accurate and timely communication
- Inclusive and accessible
- Accessibility of grievance mechanisms
- Transparent and fair in its processes, decision-making and outcomes
- Partnership based
- Empowers communities
- Enables self-determination
- Can be measured and evaluated.

The approach to engagement will be consistent across all project phases so long-term relationships with stakeholders can be established and built to deliver the best outcomes for stakeholders and the project. From the outset, all engagement will be recorded and monitored so that accurate and comprehensive records can be made available to support the planning approvals process.

This consistent approach to engagement across the project will ensure that:

- The claims of affected stakeholders are captured, considered and responded to in a timely manner for each management plan and associated activity
- Technical and operational considerations are captured and considered in early project activities as well as construction, operations and delivery
- Relationships with stakeholders that may not be directly affected by early project activity can be built over the life of the project through regular and consistent engagement across all project phases
- There is a robust record of ongoing engagement to support the planning approvals process and demonstrate the project's genuine commitment to meaningful engagement
- Strong stakeholder relationships are built, so that opportunities to deliver value to local communities can be identified early.
- The approach to continual engagement will be refined to meet stakeholder needs and regulatory and legislative requirements as the project progresses.

Each project phase has unique triggers and opportunities for further consultation and engagement and will be supported by the project's broader communication approach that will underpin the engagement activity. The engagement phases are:

- Early engagement
    - Floating LiDAR
    - Geotechnical and geophysical surveys
    - Marine surveys.
- Approvals engagement
    - To be determined – potential engagement as part of seeking approval for the project under the EPBC Act and undertaking assessments under the *Environment Effects Act 1978* (Vic).
- Delivery engagement
    - Construction
    - Operations
    - Decommissioning.

Across all these phases High Sea Wind will share project information through a variety of channels, engage with relevant community groups and stakeholders and partner with other offshore developers to provide coordinated, thorough engagement.

The objectives of engagement on High Sea Wind are outlined in Table 4-1 below.

Objective	Early	Approvals	Delivery
Ensure all regulatory and legislative requirements are met	X	X	X
Understand stakeholder interest and concerns about project activities and incorporate relevant considerations into planning and operations	X	X	
Identify meaningful opportunities to support communities and stakeholders	X	X	X
Understand community and stakeholder values, vision, issues and concerns, and seek their input on community benefits.	X	X	
Understand local industry requirements and challenges to shape an appropriate response to issues related to small business, industry, supply chain and workforce development	X	X	X
Establish positive work relationship with other licence holders, ports, maritime users and onshore stakeholders	X	X	X

Table 4-1 High Sea Wind engagement objectives

Comprehensive project and approvals information and opportunities to provide feedback will be made available to stakeholders consistently from the start of the project. High Sea Wind will approach engagement with stakeholders who do not have, and don't claim to have, a direct claim on the project activity from a whole of project perspective.

4.1.1 Complaints management

High Sea Wind is committed to supporting open and transparent communication between the project and its stakeholders. This includes creating genuine opportunities for stakeholders to make enquiries and complaints and receive a timely and considered response as summarised in Table 4-2.

Complaint	Enquiry
A comment, feedback or report that: expresses dissatisfaction and may or may not require action to be taken highlights a hazard that is a threat to the safety of people or the environment suggests an improvement to an aspect of OW's approach, conduct or operations.	a question related to the project or associated impacts, benefits or issues a comment that is neutral or positive in nature that requires acknowledgement.

Table 4-2 Complaints process

High Sea Wind has established the following channels to enable enquiries and complaints to be submitted:

- Project email address
- Project phone number.

Incoming enquiries and complaints, and all outgoing stakeholder communication and engagement activity, will be recorded in a dedicated stakeholder management database.

4.1.1.1 Complaints management procedure

High Sea Wind will follow a consistent complaints and enquiries management procedure regardless of how the enquiry or complaint was received and who it was received from as described in Table 4-3.

The response timeframes will vary depending on the urgency and magnitude of the complaint. This will ensure that all enquiries and complaints are addressed appropriately.

Some complaints may require urgent action. Urgent complaints will be addressed as soon as possible. Examples of an urgent complaint include safety hazards, health and wellbeing and security concerns.

Step	Summary	Detail	Timeframe
1	Receive and register	Enquiry or complaint is received via project phone number, email, online form, social media or in person.	N/A
2	Acknowledgement	Acknowledgement of the enquiry or complaint is issued via the same channel the enquiry or complaint is received, unless another channel is requested. The acknowledgement should include: Clarification of any issues or request for more information How the enquiry or complaint may be investigated	Up to 1 business day depending on the channel

Step	Summary	Detail	Timeframe
		Expected response timeframe If possible, the enquiry or complaint should be resolved immediately.	
3	Investigation	Enquiries and complaints will be investigated, and all reasonable attempts will be made to resolve complaints. Investigation may include: Consult with staff, consultants and contractors Get relevant data and evidence Contact community members and other stakeholders	N/A
4	Internal escalation	If required. If the team member is unable to resolve or respond to an enquiry or complaint, it should be escalated to the High Sea Wind Project Manager for response or appropriate delegation. Complaints related to the consultation process will be escalated to the Stakeholder Associate in the first instance.	N/A
5	External referral	If required. In the event of a complaint, if the complainant is not satisfied with the response and does not feel the complaint has been resolved by OW, the OW may refer the complaint to an independent mediator for resolution. The complainant reserves the right to escalate the complaint to the Victorian Civil and Administrative Tribunal (VCAT).	N/A
6	Response and resolution	A response to the enquiry or complaint will be issued via the same channel the enquiry or complaint was received, unless another channel is requested. The response should include an appropriate level of detail to address the enquiry or complaint. In the event of a complaint, the response should include an option for escalation if the complainant is not satisfied that it has been resolved.	When no internal escalation is required, respond within 2 business days. Otherwise respond as soon as possible and provide an update to stakeholder once per week

Table 4-3 Complaints management procedure

4.2 Process of continued identification

High Sea Wind will continue to engage with consultees and other stakeholders and maintain open feedback channels throughout the floating LiDAR survey program and subsequent activities.

Prior to each legislated consultation process for future activities, High Sea Wind will follow the consultee identification process described in Section 3 to identify consultees relevant to the activity and refine the list as required. Although many of the consultees

will be consistent across activities, High Sea Wind will revisit the consultee identification process for each activity to ensure that new consultees are identified and are engaged appropriately.

The project will maintain open channels of feedback via the website, project email address and a phone number to be established prior to commencement of activities under the management plan. Project stakeholders, including those who may be consultees for future activities, will be able to self-identify via these channels, or directly with the project during in-person events, such as community information sessions.

Further, High Sea Wind will increase its presence in local communities as the project progresses through initiatives such as community events and information sessions, community partnerships and benefit sharing funds and media. The project will continue to engage with industry via industry forums, conferences and committees to raise awareness of the project. This presence in communities and the offshore wind industry will allow potential consultees and interested stakeholders can self-identify and make themselves known to the project.

In accordance with the stakeholder engagement strategy, all stakeholders, including consultees, will be recorded in the Stakeholder Management Database and all records of interactions with will be recorded within timeframes set out in the project record keeping procedure.

The stakeholder list will be reviewed every six-months to capture new stakeholders and to capture any changes to stakeholder lists.

4.3 Summary of claims for ongoing engagement

A summary of claims raised and assessed is included in Table 3-15. This table also includes any measures to address the claim and ongoing monitoring measures in place.

4.4 Process of continual engagement

For future engagement, High Sea Wind will revisit the consultee identification process in Section 3 to identify what stakeholders are considered consultees for that activity.

Consultation will then be tailored for consultees by considering:

- Responses to previous consultation, including level of interest and communication preferences
- Potential effect of the management plan activity
- Engagement with representative bodies and other stakeholders.

4.5 Stakeholder engagement reports

Claims raised by consultees and stakeholders will be assessed in line with the claims assessment process. All future claims will be documented in consultation records, which will be updated as new claims arise.

4.6 Publication of the stakeholder engagement strategy

High Sea Wind is committed to meeting the requirements set out in Regulation 82(4)(a), (b) and (c) by:

- Publishing the stakeholder engagement strategy on the High Sea Wind website within 30 days of the management plan being approved
- Updating the stakeholder engagement strategy for the duration of the activity
- Ensuring the latest version of the stakeholder engagement strategy is available on the High Sea Wind website for public access.

4.7 Strategy updates

An overarching stakeholder engagement strategy will be updated every six months to coincide with the regular revision of the stakeholder list. New stakeholders will be identified and added to the stakeholder engagement strategy as needed.

An updated stakeholder engagement strategy will be published on the High Sea Wind website to coincide with these reviews, or earlier to coincide with the submission of a management plan.

5. Conditions of licence

There are five conditions within Feasibility Licence FL-002 as listed in Table 5-1. These conditions are addressed in this management plan.

Condition
1. The licence holder is to assess the feasibility of the proposed commercial offshore infrastructure project (i.e. 1.28 GW fixed-bottom wind farm).
2. The licence holder must comply with any requirement to pay an amount of offshore electricity infrastructure levy.
3. The licence is subject to the condition specified in section 6 of the *Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022* (as at the day the licence was granted)
4. The following people must comply with the management plan for the licence, if there is one: The licence holder; Any other person carrying out activities under the OEI Act of the licence on behalf of the licence holder
5. The licence holder must give reports to the Registrar or Minister in accordance with section 33 of the *Offshore Electricity Infrastructure Regulations 2022.*

Table 5-1 Feasibility Licence FL-002 conditions

6. Obligations under the EPBC Act

A self-assessment under the EPBC Act was conducted for the floating LiDAR survey to determine whether a referral was required. The self-assessment was conducted in keeping with the process outlined in EPBC Act Policy Statement 1.2 (Commonwealth of Australia (CoA), 2013b). It evaluated the proposed activity, the significant impact criteria under the EPBC Act in accordance with Significant Impact Guidelines 1.1 – Matters of National Environmental Significance (CoA 2013a) and the risk risks of significant impacts and proportionate requirements for formal assessment by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

The steps involved in the self-assessment included using the Protected Matters Search Tool (PMST), Australian Heritage Database and Australian Wetlands database to identify which plans, animals, habitats or places the activities might affect and considering the potential for all possible impacts, including direct, indirect and facilitated. Where potential impacts were identified, these were assessed considering the Significant Impact Guidelines 1.1.

Given the limited scale of the proposed activities, and with reference to DEECCW's significant impact criteria and guidelines (CoA 2013a, 2013b), none of the potential impacts associated with the deployment and operation of floating LiDAR buoys are considered to have potential for significant impact on matters of national environmental significance under the EPBC Act.

6.1 Obligations

High Sea Wind does not have any obligations under the EPBC Act, or under associated regulations, in relation to the floating LiDAR. Any obligations required under the EPBC Act for geotechnical surveys will be included in the update of the management plan.

6.2 Measures to comply with obligations

High Sea Wind does not have any obligations under the EPBC Act, or under associated regulations, in relation to the floating LiDAR. Table 6-1 provides an overview of measures that will, however, be implemented to avoid, reduce or mitigate any potential impacts that arise as a result of the licence activity. The LiDAR activity does not present any impacts that could be considered to be potentially significant according to the definitions described in the Significant Impact Guidelines 1.1.

Activity	Potential impact	Potential receptor	High level-assessment	Measures to avoid, reduce or mitigate impacts	Likely to have a significant on MNES?
Vessel activities during floating LiDAR deployment, scheduled and unscheduled maintenance and retrieval.	Degradation of water quality due to routine release of waste, or accidental spill of fuel or other hazardous and non-hazardous waste.	Water environment	The scale, duration and intensity of impacts is limited by short duration of vessel operations (days to weeks) and rapid dilution of released waste. Compliance with standard regulations will significantly reduce the likelihood of occurrence.	**Avoid (by design)**: Robust systems for power and data storage that reduce the need for buoy access or unscheduled maintenance. **Avoid (design)**: Solar-powered design that eliminates need to have fuel for the buoy on board. **Mitigation**: Compliance with the MARPOL 73/78 Convention, namely Annex IV – Regulation for the prevention of pollution from sewage from ships, and Annex V - Regulation for the prevention of pollution from garbage from ships.	No
	Injury or death from collision with project vessels.	Marine mammals, marine turtles and sharks	Vessel operations are estimated to be in the order of days to weeks. Therefore, despite the severity of an occurrence should it occur, the likelihood is considered remote, especially with mitigation.	**Mitigation**: Compliance with Wildlife (Marine Mammals) Regulations 2019, Part 1 and Part 2 of Australian National Guidelines for Whale and Dolphin Watching 2017and EPBC Act Regulations	No

Activity	Potential impact	Potential receptor	High level-assessment	Measures to avoid, reduce or mitigate impacts	Likely to have a significant on MNES?
				caution zones and vessel speeds within these zones.	
	Habitat / community disturbance due to the introduction/spread of marine pests by transiting vessels.	Benthic environments	The impact on ecological integrity could be severe if new pests are introduced and become established. The risk is considered low given the nature and duration of vessel operations and with mitigation.	**Mitigation**: Compliance with the Commonwealth Biosecurity Act 2015 and Australian biofouling management requirements.	No
	Habitat / community disturbance due to vessel anchors during deployment or unplanned maintenance	Benthic environments	Disturbance limited to the footprint of the clump weight (0.8m2) and therefore, insufficient in its scale to have any material impact (which is also reversible).	**Mitigation**: The vessel will not anchor unless essential for safety reasons.	No
Presence of floating LiDAR buoy (and moorings)	Habitat / community disturbance due to the introduction/spread of marine pests where the marine buoy provides artificial substrate for colonisation	Benthic environments	Given its size (16m2 above water and 0.8m2 clump weight), the buoy introduces a very small amount of substrate to the marine environment. As the buoy is intended to remain stationary during deployment, the risk that the buoy would act as stepping-	**Avoid (design)**: Compliance with Australian biofouling management requirements. Regular cleaning and maintenance, as well as using anti-fouling coatings. **Mitigation**: Compliance with the Commonwealth Biosecurity Act 2015.	No

Activity	Potential impact	Potential receptor	High level-assessment	Measures to avoid, reduce or mitigate impacts	Likely to have a significant on MNES?
			stone substrate for pest invasions is remote. With mitigation to reduce the introduction of pests, the risk of significant pest introductions is considered negligible.	**Mitigation**: Use of the LiDAR buoy monitor the spread of invasive species as a management tool. **Avoid (design)**: Site selection to consider the surrounding area and value of the bottom substrat e	
	Altered hydrodyna mic and sediment transport processes	Oceanograph y	While the equipment is tethered to the seabed its footprint above water (16m2) is insufficient in its scale to have any material impact on hydrodynamics and sediment transport.	N/A	No
	Disturbanc e due to artificial light at night	Birds and marine turtles	While the LiDAR method uses light, the wavelength, frequency, and intensity are outside of the spectrum to displace or attract species. Lighting at night is restricted to navigation lights.	**Avoid (design)**: Inherent design of buoy lighting for safety/navigatio nal purposes only limits disturbance.	No
Presence of mooring system	Habitat disturbance from chains dragging across the	Benthic environment	Disturbance will be limited to the footprint of the mooring system and therefore,	**Avoid (design)**: Site selection to consider the surrounding area and	No

Activity	Potential impact	Potential receptor	High level-assessment	Measures to avoid, reduce or mitigate impacts	Likely to have a significant on MNES?
	seabed and or scour		insufficient in its scale to have any material impact (which is also reversible once the mooring system is removed). The mooring system will be weighted by a five-tonne clump weight, which is designed to withstand inclement weather conditions without dragging.	ecological value of the bottom substrate	
	Injury or death from collision or entanglement in moorings	Marine mammals, marine turtles and sharks	The small scale of the activity and temporary duration of the mooring moderates the risk. The mooring line will be taught for the duration of the survey and therefore will not likely cause entanglement with marine animals.	**Avoid (design)**: mooring design minimises seabed damage and risk of entanglement.	No

Table 6-1 Consolidation of environmental impacts related to the deployment and operation of the floating LiDAR

7. Maintenance

Regulation 88(1) states *the plan must describe measures for maintaining, in good condition and repair, relevant structures, equipment and property in relation to the relevant licence*. This section describes those measures.

The floating LiDAR contractor, TGS, is responsible for ensuring calibration and certification of all sensors and data loggers prior to deployment of the floating LiDAR.

Minimum safety and quality requirements have been considered in the floating LiDAR buoy design and acceptance testing process to mitigate risks and impacts to the campaign.

Positioning systems are configured according to the site clump weight position and a drift radius to determine the expected range of motion. If the drift radius is exceeded, EOLOS personnel are notified, and transmission frequency is increased (daily under normal operating conditions). GPS data and the positioning alarm information will be transmitted using a standalone satellite system based on Inmarsat IsatDataPro (IDP).

7.1 Monitoring, maintaining and assurance

The floating LiDAR features that allow it to perform, maintain structural soundness, strength and stability and mechanical and system integrity are described in Table 7-1.

Design requirement	Description
Mechanical and electrical protection systems	• Impermeable connections: Use of grade IP67 for the non-submerged buoy elements and IP68 for submerged ones. Protection against water intrusion through seals in equipment boxes, battery compartments, and connectors. Connectors are all IP68 sealing grade. Use of cables with weatherproof and waterproof covers. • Shock and vibration: Equipment is highly resistant to shock and vibration. • Overvoltage: Overvoltage protectors in batteries or energy production elements using regulators. • Polarity inversion: Protection against polarity inversion of all equipment. • Excess power consumption / short-circuits: Protection against excessive power consumption / short-circuits using fuses and Miniature Circuit Breakers (MCB). • Anti-explosion: Battery compartments are equipped with pressure valves to avoid excessive internal pressure, avoiding the presence of oxygen and minimising the risk of explosions due to potential leakage of hydrogen. There are specific safety procedures for this operation. • Controllers will be synchronised by GPS keeping accuracy in the internal clocks • All timestamps in the buoy will be given in UTC/GMT time.
Fouling and vandalism	• Birds: bird deterrent spikes are places on the buoy to prevent fouling. • Fouling: use of antifouling paint to minimised embedded organic material and marine animal growth on submerged FSL200 components • Vandalism: four securely locked doors, one on each side, protect the internal systems (LiDAR, communication, and electronical components). These provide the support for the solar panels and prevent any unauthorised attempts to access the FLS200.

Design requirement	Description
Data transmission	• Data download is pre-configured with 2-hour intervals • If data is not updated when requested, the systems starts requesting the missing data in shorter intervals until the information is retrieved from the system. • If necessary, the process can be performed manually by the data management team at EOLOS headquarters • In the event of a complete communication failure, unscheduled maintenance will be performed by EOLOS
Data storage	• Master datalogger stores averaged data on a 32GB microSD card • Slave datalogger stores raw and averaged data on a 32GB microSD • Storage capacity will last 15 months of data measurement (3 months of reserve) • Main sensors store data as a backup. This data can be downloaded manually by copying the internal memory or by cable. • LiDAR data has wi-fi download capability • Downloading of the backup data will occur during maintenance trips
Data post processing	• EOLOS post processes data: ○ Onboard processing by individual sensors and/or datalogger (basic to complex processing dependent on sensor and data) ○ Quality control and optimisation of data at EOLOS server including timestamp checks and unification of datasets, generation of new parameters, identification of anomalous data
Data risk prevention	• EOLOS will implement a pragmatic *Project quality management plan* to ensure data is aligned to the highest quality

Table 7-1 Floating LiDAR monitoring, maintenance and assurance

The FLS200 is made of anti-corrosion steel material (AISI316L), marine grade aluminium, marine grade plastics and rubber and zinc sacrificial anodes to prevent galvanic corrosion to the submerged portions of the structure. Floaters are made of compact solid polyethylene foam, providing reliable buoyancy to the system and vessel impact resistance. The non-submerged portions of the FLS200 are painted yellow RAL 1023, as recommended by the International Association of Marien Aids to Navigation and Lighthouse Authorities (IALA)1. The submerged portions are painted with environmentally safe antifouling coast to treated marine growth. Table 7-1 outlines the design features to deter wildlife and human access to the buoy.

EOLOS ensures consistency of the FLS200 and of the recorded datasets throughout the campaign. EOLOS will agree with TGS any significant software and/or hardware changes implanted in the FLS200 during the campaign which could impact the consistency of the measurements.

7.2 Standards

EOLOS ensures that each instrument mounted on the FLS200 has its own calibration certificates or certificate of conformity. Prior to installation, TGS will receive a document which describes the main system specifications, including design description, as built list with main equipment specs, mooring design and calibration certificates for the main sensors.

If standards are not met during the onshore or offshore testing (at deployment or during the service trips), equipment will be replaced.

7.3 Requirement to implement maintenance

High Sea Wind will implement the maintenance obligations and measures set out in section 7.

8. Decommissioning

Regulation 89 states the *plan must describe decommissioning of licence infrastructure*.

8.1 Intended decommissioning of infrastructure

As the floating LiDAR will sit on the sea floor via a clump weight, it will not require decommissioning at the end of the survey period. Instead, it will be removed and towed back to port.

8.2 Remediation in relation to decommissioning

The licence area will not be required to be remediated after the floating LiDAR is removed as the infrastructure does not require decommissioning and can simply be removed and towed to port once the survey is completed.

9. Removal and remediation

9.1 Removal

Regulation 90(1) states *the plan must describe how relevant structures, equipment and property in relation to the relevant licence are to be removed from the licence area if*

(a) they are neither used nor intended to be used in connection with the activities:

i. in which the licence holder is or will be engaged; and

ii. that are authorised or required by or under the Act; and

(b) section 116 of the Act (subject to subsection (6) of that section) requires them to be removed from the licence area.

9.1.1 Floating LiDAR System

At the completion of the measurement program, the floating LiDAR shall be recovered in full. Table 9-1 outlines the removal strategy, timeline and responsible party. Further information on buoy removal, which under normal conditions, is essentially the reverse of deployment, is provided below.

Activity	Removal strategy	Timeline	Responsible party
Floating LiDAR	Retrieve all surface and mooring infrastructure using appropriate vessels and lifting equipment.	Commence within 30 days of completion of the final data acquisition campaign*	TGS – Floating LiDAR contractor
	Conduct seabed visual inspections during recovery to confirm full asset removal.		
	Recover anchors fully		

*subject to weather and port access

Table 9-1 Removal strategies and timelines for main activities

9.1.1.1 Buoy retrieval

Retrieval of the buoy under normal conditions is essentially the reverse of the deployment; the buoy is pulled to the vessel, craned aboard followed by the recovery and securing of the mooring equipment.

Upon a mooring failure occurring, the FLS2000 independent satellite beacon out-of-watch-circle co-ordinates will automatically send alerts (refer Table 9-2). These alerts indicate that the FLS2000 has drifted off location, i.e. has travelled a distance greater than the watch circle limit and its possible surface excursion (e.g. 500 m).

Day	Action
1	Client contacted with the drifting buoy confirmation
2	Vessel owner contacted and vessel booked for the first suitable weather window
3	TGS personnel mobilise to Port Anthony, prepare spare mooring and equipment
4	Mob the vessel using shoreside crane, steam out to drifting buoy based on last received GPS location from satellite beacon
5	Recover buoy to deck or tow buoy back to sheltered waters for recovery to deck; anchor and remaining mooring stays on the seabed; no threat to shipping
6	Determine the point of failure of the mooring, rebuild the mooring on the back deck (potentially in sheltered waters depending on weather)
7	Upon a suitable weather window, re-deploy mooring at 500m distance from the previously deployed location
8	Demobilise vessel alongside Port Anthony, arrange equipment surplus in the warehouse at Port Anthony
9	TGS personnel demobilise from Port Anthony. Discuss with client on spare mooring procurement at this point in time

Table 9-2 Emergency response in the case of failed mooring

In the unlikely event of a mooring failure, there will be a portion of the mooring that remains on the seabed; anchor weight, plus a length of mooring to the point of failure. The recovery of this material poses significant risks depending on the method employed to do so.

The risks associated with grappling include but are not limited to:

- Deck equipment, rigging, grapnels would have to be sized accordingly for anchor and chain and seabed interference and dynamic load of vessel / sea state
- Deck equipment failure if grapnels catch something excessively large or solid
- Grappling equipment failure if grapnels catch something excessively large or solid
- Equipment under significant tension during operations and immediate increase in tension once hooked onto something (not necessarily the mooring components).

The use of an ROV is recommended to locate floating and sunken mooring lines as well as the anchor. Once located:

1. Floating lines must be located and hoisted to the deck via winch and secured on deck
2. Check for attached detritus (e.g. fishing nets, etc)
3. Winch the mooring chains to deck via chain, securing the load to permit craning of the main anchor to deck
4. Slowly raise the anchor to deck using the crane ensuring it is secure, use the deck winch to reduce/eliminate swinging of the load.

The above must be assessed depending on vessel spec, a suitably rated crane (e.g. 20 tonne), must be used to haul the anchor to surface.

Once on board, the failed mooring is to be secured and stored. The FLS should then be floated with its replacement mooring as per standard methodology.

9.2 Remediation

Regulation 90(2) states *the plan must describe how the licence area is to be remediated in relation to the removal of relevant structures, equipment and property*.

9.2.1 Seabed

A post-recovery assessment will be undertaken by the floating LiDAR contractor to ensure the seabed and surrounding environment are returned to pre-deployment condition. No residual waste and minimal seabed disturbance is anticipated, given the temporary and self-contained nature of the equipment. HSW as the licence holder is accountable for compliance with removal of equipment and for remediating any damage and will review the assessment to determine whether remediation, or further remediation, is required.

9.3 Requirement to remove and remediate

HSW will implement the obligations and measures set out in section 9 of this plan.

10. Emergency management

This section describes how the management plan addresses Regulation 91(1) and Regulation 91(2).

10.1 Emergency scenarios

High Sea Wind Emergency Response Plan (ERP) is complemented by the TGS and vessel contractor's ERPs to ensure all foreseeable emergency situations are considered, planned for and controlled in an efficient manner.

TGS also have an emergency response procedure that will be followed as appropriate and in line with the management plan. HAZID and Bridging documentation required under the contract also support these requirements.

There are several emergency situations that could arise during the floating LiDAR buoy deployment and retrieval (regulated licenced activity), summarised below:

- Illness/injury
    - Vessel injury or medical emergency
    - Injury or medical emergency categorisation
    - First aid/minor injury
    - Medical evacuation
    - Vessel breakdown with injured person
    - Other vessel emergency response scenario
- Man overboard
- Fire
- Adverse weather conditions/sea conditions including heavy weather, lightning
- Abandon ship
- Vessel collision
- Spill / chemical pollution
- Vessel breakdown / engine failure
- Animal strike.

The ERP outlines the emergency response organisation and notification procedures, relevant scenarios identified and associated response arrangements. The plan will be part of the induction and accessible by all workers to ensure familiarity with the plan, relevant roles and responsibilities.

Following drills or real events, a debriefing including generation of lessons learned shall be implemented to ensure exhaustive feedback is obtained from the situation. The lesson learnt shall be shared with the persons or organisation involved in the drill/event.

Emergency situations and scenarios are described in more detail in the sections below. The Risk Register also identifies all foreseeable hazards and risks that would warrant emergency response and includes prevention measures and controls to mitigate likelihood for each emergency.

In the event of an emergency, the safety of people shall always be the first priority:

- Attend to injured personnel
- Initiate emergency response

- Contact relevant people through notification protocols.

10.2 Vessel injury or medical emergency

Any illness or injury shall be brought to the attention of the Vessel Master and TGS Operations Manager immediately. Onboard the vessel, the personnel most qualified in first aid will be the designated first aider who is responsible for giving the primary care as he/she sees fit and, along with the Vessel Master, ensure that the most appropriate response is undertaken. The designated first aider will be identified and appointed during the project induction.

10.2.1 Injury or medical emergency categorisation

Medical treatments have been categorised as 'first aid/minor injury or medical evacuation' to assist with appropriate response. All illnesses or minor injuries must be treated. Untreated injury/illness can quickly deteriorate if not treated. The following sections provide a description of these categories.

10.2.1.1 First aid/minor injury

Onboard Vessel / Offshore: The designated first aider shall be consulted for any injury or illness and is responsible for providing appropriate primary care.

Where the injury or illness is of a minor nature and further medical treatment is not deemed necessary, the designated first aider shall advise the TGS Operations Manager and Vessel Master of the patient's status.

The TGS Operations Manager will keep the TGS Project Owner and High Sea Wind notified of the status of the situation. The patient shall be taken off duty or allocated light duties and rest as required and condition monitored. It is the responsibility of the designated first aider to assess when a patient is fit to return to work.

10.2.1.2 Medical evacuation (Medivac)

Under Regulation 161(1) and the WHS Act, this is a notifiable incident. The Contractor is responsible for notifying High Sea Wind as soon as possible of any serious injury. High Sea Wind will verbally notify the OIR as soon as practicable once they are made aware of the incident and will provide a written report within 48 hours.

If the designated first aider considers that an illness or injury requires further treatment, advice will be sought by calling AMSA Marine Search and Rescue 112 satellite phone, 1800 641 792, or the emergency number 000. The vessel will begin transit to the nearest port immediately. First aid will continue to be provided by the designated first aider as required.

10.2.1.3 Vessel breakdown with injured person

In the unlikely event that the vessel breaks down and the patient cannot be transferred to another vessel, the Vessel Master shall contact AMSA to determine response options. The ERP includes contact information for AMSA. Under Regulation 161(1) and the WHS Act, this is a notifiable incident. The OIR will be notified by High Sea Wind as soon as practicable, and a written report provided within 48 hours of the injury.

If there is no injury on the vessel and no medical treatment is required, the Vessel Master and crew shall determine the extent of the vessel breakdown and determine if the vessel can be fixed or operate with limited capacity. Others on the vessel will take instruction from the Vessel Master to ensure everyone is kept safe and returned to port safely.

10.3 Other vessel emergency response scenarios

There are numerous vessel related emergency response scenarios that can occur on the vessel. Appropriate responses to vessel emergencies are detailed in the Vessel ERP and flowchart. The Vessel Crew will assist the Vessel Master as directed; however, all personnel are expected to be familiar with appropriate alarms and responses. All crew and passengers will be briefed on the alarms and responses during the vessel induction.

Any scenario that triggers the implementation of the ERP is notifiable to the OIR. As soon as an incident occurs, the Vessel Operator is responsible for notifying TGS, who will immediately contact High Sea Wind. High Sea Wind will contact the OIR via phone as soon as they are aware of the incident and will provide a written report within 48 hours of the incident occurring.

10.3.1 Man overboard

If a person has fallen overboard, the alarm shall be raised immediately by shouting "man overboard" (MOB) and, if possible, a life ring shall be deployed, and the bridge immediately informed. The person who spotted the MOB shall keep visual contact with the MOB and point in the direction of the person in the water. Visual contact should be maintained at all times until the vessel can return to recover the MOB. Fire onboard

On discovery of a fire onboard the vessel the Vessel Master must be notified immediately, who will sound the alarm. All personnel shall muster. If safe and able to do so, the Vessel Crew will attend to the fire. All other personnel will assist as directed. Under Regulation 161(1) and the WHS Act, this is a notifiable incident.

10.3.2 Adverse weather

Weather forecasts will be monitored every day prior to leaving port and throughout the time at sea. At all times, ensuring that the vessel remains a safe distance from any storm activity. The Vessel Master is ultimately responsible for the vessel and all personnel on board during adverse weather. The Vessel Master has the authority to stop operations and seek shelter if they believe that a significant storm is imminent. Abandon ship

The Vessel Master shall determine if the vessel is sinking and that an abandon ship is required. Only the Vessel Master shall determine if this measure is required. Should the Vessel Master be incapacitated or missing, the Chief Officer, or second in command, will decide whether to abandon the ship. Should both the Master and Chief Officer be incapacitated or missing, then the decision will be decided by the third in command and so on.

Under Regulation 161(1) and the WHS Act, this is a notifiable incident.

10.3.3 Spill / chemical pollution

In the case of an oil spill on the vessel, the vessel Shipboard Oil Pollution Emergency Plan (SOPEP) / Shipboard Marine Pollution Emergency Plan (SMPEP) will be followed. It details the containment of spills using an oil spill kit which is readily available on board the vessel for quick response to spills. The plan also prescribes procedures and contact information for reporting all spills and for disposal of all clean-up materials. All spills into the water, no matter how small, are to be reported immediately to the Vessel Master and TGS Operations Manager. The TGS Operations Manager will report all spills to High Sea Wind. Under Regulation 161(1) and the WHS Act, this is a notifiable incident.

10.3.4 Vessel collision

Given the water depth at the activity site, vessel grounding is not considered a credible emergency scenario.

In the event of a vessel collision with a transiting or errant vessel or marine fauna, the priority will be the safety of all personnel on board the vessel. The Vessel Master and crew will determine how to move out of the situation and limit damage and impact to the object that has been struck.

Once clear of the danger the Vessel Master and crew will assess potential damage to the vessel and determine if the vessel can continue or there is a need to return to port. If the vessel collides with licence infrastructure (in this instance the floating LiDAR buoy), the OIR will be notified in accordance with Regulation 161(1)(c) and/or (f). If the vessel strikes an EPBC Act listed threatened marine fauna species, DCCEEW will be notified. If this species is a marine mammal, Australian Government and Australian Marine Mammal Centre will be notified.

10.3.5 Animal strike

All vessel crew will be inducted in their responsibilities as required regarding marine fauna interactions. All vessel strike incidents will be reported to:

- Secretary of DCCEW via EPBC.Permits@dcceew.gov.au or 1800 920 528 within seven days
- AMSA via the AMSA Incident report
- Australian Government and Australian Marine Mammal Centre via a ship strike report https://data.marinemammals.gov.au/.

10.3.6 Drifting LiDAR buoy

On confirmation of a drifting LiDAR buoy, the TGS team will initiate a response to retrieve the buoy by arranging a suitable vessel for recovery and sending crew for retrieval. The LiDAR buoy will then be towed back to a suitable port.

Upon a mooring failure occurring, the FLS200 independent satellite beacon out-of-watch-circle co-ordinates will automatically send alerts. These alerts indicate that the FLS200 has drifted off location i.e. has travelled a distance greater than the watch circle limit and its possible surface excursion e.g. 500m.

In the unlikely event of a mooring failure, there will be a portion of the mooring that remains on the seabed; anchor weight, plus a length of mooring to the point of failure. The recovery of this material poses significant risks depending on the method employed to do so.

The use of an ROV is recommended to locate floating and sunken mooring lines as well as the anchor.

Once on board, the failed mooring is to be secured and stored. The FLS should then be floated with its replacement mooring as per standard methodology

10.4 Emergency Response Plan

This section describes the HSW Emergency Response Plan (ERP) to be implemented in the event of an emergency condition that may occur whilst undertaking the regulated activity.

HSW have developed an *Emergency, Escape and Rescue Plan – Development* (EERP) for regulated activities in Australia. This Plan constitutes the Emergency Response Plan (ERP) as describe under Regulation 91(2)(e).

TGS will develop a project-specific Emergency Response Plan (ERP) that bridges to the HSW EERP and any relevant requirements specified within the management plan.

The purpose and requirements of this section are to:

- Describe the capabilities, roles and responsibilities of High Sea Wind, TGS, and the Vessel Operator in relation to their respective ability to respond to the potential emergency scenarios described in section 10.1 above.
- Set out processes to quickly and effectively respond to the potential emergency scenarios described in section 10.1 above.
- Set out processes to ensure timely notification to, and effective communication with, workers, responders, emergency service providers and other persons and organisations in the event of a potential emergency scenario as described in section 10.1 above.

The EERP and TGS ERP are, or will be, consistent with its purpose and requirements as described above.

The TGS ERP will align with:

- Offshore Infrastructure Regulator (OIR) requirements under the Offshore Electricity Infrastructure Act 2021 and associated WHS framework (as applied)
- The Work Health and Safety Act 2011 (Cth) and state equivalents (for works in State waters).
- Australian Maritime Safety Authority (AMSA) Marine Orders (MO), particularly;
    - MO 21 (Safety of Navigation)
    - MO 12 (Construction of Offshore Units).
    - MO 91 (Marine pollution prevention — oil) and mandatory MARPOL pollution reporting requirements
    - MO 504 (for domestic commercial vessels where applicable)

- The National Standard for Commercial Vessels (NSCV) and Marine Order 504 for vessel operations.

The TGS ERP will:

- Detail credible emergency scenarios and worst-case credible events (as described in section 10.1) and include procedures and resources for these emergency scenario and demonstrate compliance with AMSA and OIR requirements.
- Define roles and responsibilities, including Incident Commander (Vessel Master) duties, shore-side emergency coordinators, and links to HSW Incident Management Team.
- Establish primary communication protocols (to AMSA JRCC in an emergency via VHF 16/phone, and to HSW Project Management once safe).
- Detail drills/exercises required by AMSA Marine Orders (e.g. abandon ship, fire response, medevac).
- Ensure compliance with Shipboard Marine Pollution Emergency Plan (SMPEP, anti-pollution response) carried on all vessels.
- Provide clear procedures for interfacing with local emergency authorities such as Victoria Police Marine Unit and Volunteer Marine Search and Rescue (MSAR).

High Sea Winds will maintain currency of the EERP and conduct regular risk assessments and drills to ensure readiness and all contractors and vessel personnel are adequately trained and skilled to execute the emergency procedures.

10.4.1 Capabilities, roles and responsibilities

HSW and Contractors are expected to work together during emergencies. The Vessel Master will act as the Incident Commander for responding to emergencies. HSW will support and coordinate with the Contractor's (in this instance TGS) project management team to handle any emergencies.

The following is a description of the capabilities (presented in terms of systems, plans/procedures, people or equipment), and roles and responsibilities of High Sea Wind, TGS, and the Vessel Operator in relation to their respective response requirements to the potential emergency scenarios described in section 10.1 above.

Emergency response capabilities:

- HSW:
    - Systems: Stakeholder communications strategy, including communications protocols for unplanned events. Commercial (finance), contracting, and human resource systems to support emergency response implementation. Financial security as required under the Act. (
    - Plans / procedures: The management plan, EERP, and Ocean Winds corporate procedures
    - People: Ocean Winds have an Incident Management Team (IMT) structure which includes specific duties for the Chief Executive Officer, Project Director, Technical Manager, External Affairs Manager, Permitting & Environmental Manager, Project Manager, HSE Manager, and Onboard Client Rep (where applicable). HSW have a dedicated Melbourne-based management team to enable the effective coordination of emergency response notifications, risk evaluation, financing (as/if required), coordination, stakeholder and government

interface in the event of an emergency condition. Further, HSW have global resources to form the IMT and support the Melbourne-based management team, including a HSE Director based in the United States. HSW has contracting arrangements with a Principal consultant with experience in emergency coordination and response that could be engaged to support in the event of an emergency,
    - Equipment: Office and communication facilities

- TGS:
    - Systems: ensures effective communication channels with vessel and other parties including High Sea Winds. Also monitors Lidar systems for any signs of malfunction to promptly alert and implement emergency processes
    - Plans / Procedures: ERP Bridging document inclusive of medivac plan and ensuring the emergency response plan roles and responsibilities are in coordination with vessel and integrated with vessel emergency plans. Ensures processes are in place for incident reporting and notification requirements.
    - People: are trained in the emergency response protocols and understand their role in support of the vessel operators command during emergencies
    - Equipment: to comply with requirements set out in risk assessments and vessel requirements and ensure any equipment provided by TGS is in good working order

- Vessel Operator:
    - Systems: Safety Management System. Weather tracking to monitor adverse weather and/or sea state conditions. Forecasting and monitoring must use the Bureau of Meteorology (BoM) Marine and Severe Weather warnings. Weather-readiness protocols consistent with AMSA/Harbour Master directions.
    - Plans / Procedures: Standdown procedure in the event of adverse weather. Shipboard Marine Pollution Emergency Plan (SMPEP) consistent with Marine Order 91 (Marine pollution prevention - oil)
    - People: Vessel Master / Second in Command / trained first aider
    - Equipment: Equipment consistent with that required according to class and Marine Order 25 (Equipment – lifesaving) 2014 made under the Navigation Act 2012. In service fire extinguishers. Spill equipment.
    - Communication equipment
    - FLS retrieval equipment

Given the nature and scale of the potential emergency conditions as detailed within section 10.1 above, the respective and combined capabilities of HSW, TGS and the vessel operator are commensurate with the risk posed by each of the scenarios to enable the timely and effective response.

Roles and responsibilities:

- HSW:
    - Oversight of any activity-related emergency response to ensure that all response and remedial actions (irrespective of type, nature and scale of the emergency) complies with all relevant obligations under the management plan or any other relevant regulatory requirement.

- Provide local, regional and global support (as/if required) for emergency response coordination and resourcing commensurate with the type, nature and scale of emergency scenarios described in section 10.1
- Report all emergencies according to the requirements stipulated in this plan depending on the nature of the emergency. Ensure that all emergency situations are communicated in a timely fashion and any requirement to notify the OIR (or other regular) is completed within regulatory required time frames.
- Investigate all incidents and emergencies according to section 10.1 and send written report to OIR within required timeframes
- Support any subsequent regulatory inspection or investigation that may be initiated as a result of an activity-specific emergency scenario.
- The Ocean Winds Incident Management Team (IMT) responsibilities are outlined within the EERP.

- TGS:
  - TGS has responsibility over the FLS and for vessel contracting arrangement, including during an emergency condition.
  - TGS is responsible for the coordination of remedial action in the event of a drifting LiDAR buoy.
  - Support the investigation of all incidents and emergencies by providing all necessary and relevant information to HSW and regulators (as/if required)
  - report all emergencies according to the requirements stipulated in this plan depending on the nature of the emergency.

- Vessel Operator:
  - During the regulated activity or associated vessel-based emergency scenario, the Vessel Master has ultimate authority and responsibility for the safety of the vessel, crew and passengers. The designated first aider will coordinate with the Vessel Master to determine appropriate response for any injury or illness.
  - Prepare and respond to emergencies in a manner consistent with International Convention for the Safety of Life at Sea 1974 (SOLAS) and the Navigation Act 2012.
  - report all emergencies according to the requirements stipulated in the management plan.
  - Support the investigation of all incidents and emergencies.

10.4.2 Notification and communication processes

The TGS ERP bridging document will contain detailed information and flowcharts/tables for notification, communication, escalation and response coordination of emergency scenarios on board the vessel consistent with the management plan and the EERP.

All incidents must be reported, recorded, and investigated in accordance with Australian statutory requirements and HSW HSE Employers' Requirements. Reports must be made immediately (as soon as practicable) to the appropriate authority and without delay to HSW management.

The Vessel Master will initiate the call for external resources to assist in an emergency when the Master deems assistance is required to manage the situation. The

communication will then be coordinated through channels to the vessel operator to notify TGS as the LiDAR contractor and High Sea Wind as the Operator.

10.4.2.1 Documenting an Incident

The OEI Act and WHS Act (as applied under the OEI Act) require licence holders and Persons Conducting a Business or Undertaking (PCBUs) to notify the OIR of "notifiable incidents" as soon as practicable. These incidents include fatalities, serious injuries or illnesses, and dangerous incidents. The logs in Appendices 5 and 6 (Incident Report Log and Event Log) serve as a record that these notifications have been made.

- 48-Hour Report: In addition to immediate verbal notification, a written report must be submitted within 48 hours using the OIR Incident Notification Form. The logs help track the submission of these reports and ensure all required details are captured.
- Record Keeping: PCBUs are required to keep a record of each notifiable incident for at least five years. Incident logs are the primary means of fulfilling this legal obligation.

Records of each notifiable incident must be retained for at least 5 years and be readily retrievable for inspection by the regulator.

The Incident Commander (Vessel Master) is responsible for initiating and maintaining a running log of the emergency, including times, actions taken, resources utilised, and communications. The Incident Commander can delegate this responsibility.

Standard forms are provided in Appendices 5 and 6 (Incident Report Log and Event Log) of the EERP.

These should be completed and submitted to the Contractor’s QHSE Advisor and HSW HSE Manager.

All emergency records must be securely stored and marked confidential.

10.4.2.2 Incident Report Log

The Incident Report Log (Appendix 5 of the EERP) is a structured and systematic record of the incident that contains:

- Date and time of incident.
- Location of incident.
- Description of the incident (what happened, who was involved).
- Immediate actions taken.
- Details of notification to the regulator (e.g., OIR phone call, date/time, reference number).
- Status of the 48-hour written report submission.
- Any directions or authorizations received from the regulator.
- Details of subsequent investigations and corrective actions.

10.4.2.3 Event Log

The Event Log is a chronological, detailed, and auditable record of actions, observations, and occurrences within that incident. It documents "who did what, when,

where, and why," providing a precise timeline of activities and their associated personnel, equipment, and environmental conditions

10.4.2.4 Preservation of Incident Sites

For any notifiable incident, the TGS must ensure, so far as is reasonably practicable, that the site is not disturbed until an inspector arrives or gives permission, except to assist an injured person, remove a deceased person, make the site safe, or prevent further incidents, or to comply with a police direction. Record the time preservation commenced and any inspector authorisation within the Event Log.

10.4.3 Regulatory Reporting and Notification Responsibilities

Immediate emergency calls (AMSA JRCC, Harbour Master) are made by the Vessel Master (Incident Commander).

TGS, as the operating PCBU, is responsible for making statutory regulator notifications and submissions (OIR in the Commonwealth offshore area; WorkSafe Victoria in the State/onshore), including the OIR 48-hour report. Where multiple PCBUs are involved, one PCBU may notify on behalf of all; however, each PCBU (including HSW) must ensure the notification has been made and must record the regulator reference.

HSW will verify that regulator notifications have occurred, retain relevant references, and provide supporting documentation. If the Contractor is unable to notify, HSW will notify and advise the Contractor.

Pollution incidents are reported without delay by the Vessel Master to AMSA (Commonwealth waters) or EPA Victoria (State waters). The Contractor completes follow-up reports under SOPEP. HSW supports escalation and stakeholder liaison.

- The Vessel Operator must initiate spill containment and immediately notify AMSA (Commonwealth waters) or EPA Victoria (State waters).
- HSW and TGS management will jointly agree on formal written reports before submission.
- Escalation to the Australian Marine Oil Spill Centre (AMOSC) will be coordinated by AMSA under the National Plan (NatPlan) when required.

Reporting and notification responsibilities are described in Table 10-1.

Reporting scenario	Primary responsible party	Backup Support	Regulator to notify	Contact Details	When to notify	Follow-up submissions	HSW role
On-scene emergency (SAR, marine casualty, immediate pollution)	Vessel Master (Incident Commander)	Contractor Onshore Emergency Coordinator (if delegated or shore-led)	AMSA JRCC Canberra; Harbour/Port Master (if applicable)	AMSA: 1800 641 792 VHF Channel 16 Harbour Master: VTS Melbourne Channel 12/13 +61 3 9644 9777 Vic Ports: +61 3 9644 9700	Without delay (VHF Ch.16/phone)	As directed by AMSA (e.g., POLREP details)	Verify notification occurred; record references; support info flow
WHS/OEI notifiable incident (Commonwealth offshore area)	Contractor (operating PCBU/license holder for the activity)	HSW (if Contractor is unable to notify)	OIR	Incident notification: 1300 674 472 (24/7) Email for 48-hour report: offshorerenewables@oir.gov.au	As soon as practicable after becoming aware (phone)	OIR 48-hour written report (email/form)	Verify/record OIR reference; retain records 5 years; support investigation
Notifiable incident in State jurisdiction (Victorian state waters/onshore)	Contractor (operating PCBU)	HSW (if Contractor unable)	WorkSafe Victoria	13 23 60	Immediately after becoming aware (phone)	Written record within 48 hours (OHS Act Vic s38)	Verify/record reference; retain records; support investigation
Pollution in Commonwealth waters (MARPOL)	Vessel Master (initial call) and Contractor (SOPEP lead)	HSW IMT for escalation	AMSA JRCC (pollution hotline)	1800 641 792 VHF Channel 16	Without delay	MARPOL POLREP minimum dataset; any AMSA forms as directed	Coordinate escalation (e.g., AMOSC via AMSA);

Reporting scenario	Primary responsible party	Backup Support	Regulator to notify	Contact Details	When to notify	Follow-up submissions	HSW role
							track references
Pollution in State waters (<3 nm)	Vessel Master/Contractor	HSW IMT for escalation	EPA Victoria Pollution Hotline	1300 372 842 (24 hr)	Immediately	EPA reporting as directed	Coordinate with EPA/Port Authority; track references
			DCCEEW	+61 2 6274 1111			
Diving dangerous incidents	Contractor (diving PCBU/supervisor)	HSW (verification)	OIR (WHS dangerous incident)	Incident notification: 1300 674 472 (24/7) Email for 48-hour report: offshorerenewables@oir.gov.au	As soon as practicable (phone)	OIR 48-hour written report	Verify/record; ensure site preservation; support investigation
Internal company notifications	Contractor Project Manager	Vessel Master (initial alert)	HSW PM and HSW HSE (internal)	Refer to OW EERP	As soon as safe to do so	Incident logs and internal reports	Activate IMT if required; ensure site preservation and documentation

Table 10-1 Regulatory reporting and notification responsibilities

10.4.4 Monitoring and testing

ERPs for the vessel, TGS and High Sea Wind will be tested in accordance with the following schedule:

- When the emergency response plans are introduced, to verify all scenarios and situations have been identified, and emergency contact details are correct.
- When the emergency response plan is significantly modified or at least once every 12 months, whichever is earlier.
- One emergency response drill will occur at least once per vessel trip for the LiDAR activity and may overlap with one of the above testing schedules.
- The objective of emergency response plan testing is to ensure that:
- Scenarios, situations and identified response actions are identified, viable and valid
- Workers are appropriately trained and instructed on their role in emergency response and can practice their responsibilities.
- Effectiveness of the plans are tested
- Gaps are identified, leading to improved plans and response actions for future work.
- A real emergency event will take the place of a drill if it occurs.

Following testing of the emergency response plan, or a real emergency event, a debrief including generation of lessons learned shall be implemented to ensure exhaustive feedback is obtained from the situation.

High Sea Wind, the LiDAR Contractor and Vessel operator will be involved in reviews of emergency response drills and activities. The lessons learnt shall be shared with all workers and organisations involved in the test or event. Actions resulting from the test or event may also be assigned where the actions resulting from the test or event may also be assigned where these would improve the emergency response plans. These actions shall be tracked and monitored for completion and ensure they are considered for future drills and emergency scenarios.

The Vessel Master, TGS Project Manager and High Sea Wind Project Manager and additional personnel as agreed with High Sea Wind are to ensure that the emergency response plan is implemented and effective for the works to be completed and this should be included in meetings along with safety in contractor meetings.

10.4.5 Information, training and instruction

HSW will provide TGS, the Vessel Operator, or other subcontractor engaged to support emergency response arrangements a copy of the management plan and EERP prior to the commencement of activities.

HSW project personnel will be trained according to their roles and responsibilities established in the EERP.

When operating offshore at the activity site, the Vessel Master will provide all instruction in relation to emergency response procedures and actions. If the Vessel Master is incapacitated, the second in command will assume responsibility for providing instruction.

11. Work health and safety

This section addresses Regulation 94 which states that the plan must:

a. Describe the obligations that apply to the licence holder under the applied work health and safety provisions; and

b. Describe how the licence holder is complying with, and will continue to comply with, the obligations mentioned in paragraph (a).

11.1 Obligations

11.1.1 Duties of persons conducting a business or undertaking

In accordance with the *Work Health and Safety Act 2011* (Cwth), Ocean Winds (operating as High Sea Wind Pty Ltd), as the Person Conducting a Business or Undertaking (PCBU), holds the primary duty of care to:

- Ensure, as far as is reasonably practicable the health and safety of employees and contractors.
- Ensure risks to health and safety are eliminated or, if unable to be eliminated, minimised as far as reasonably practicable.

Under the primary duty of care, High Sea Wind will ensure so far as reasonably practicable:

- The provision and maintenance of a work environment that is without risk to health and safety.
- The provision and maintenance of plant structures and systems of work that are safe and do not pose health risks.
- The safe use, handling storage and transport of plant, structures and substances.
- The provision of adequate facilities for the welfare of workers at work.
- The provision of information, instruction and training or supervision of workers needed for them to work without risk to their health and safety and that of others around them.
- The health of workers and the conditions of the workplace are monitored to prevent injury or illness arising out of the conduct of business.
- The maintenance of any accommodation owned or under their management and control to ensure the health and safety of workers occupying the premises.

In the context of the LiDAR buoy deployment and retrieval, the regulated offshore activity, High Sea Wind will exercise this duty of care and has selected TGS as the contractor to ensure the operation is performed safely and in accordance with legal obligations, High Sea Wind and Health, Safety, Environment and Quality (HSEQ) requirements, and industry best practices.

11.1.2 Shared duties

11.1.2.1 Lidar buoy contractor

TGS, as a PCBU and the Principal Contractor for the LiDAR buoy, holds a shared PCBU duty with High Sea Wind. TGS has developed a LiDAR project execution plan. TGS will develop a Health, Safety, Security, Environment and Quality (HSSEQ) Plan, which will

be reviewed and approved by High Sea Wind and will demonstrate that the delivery of their scope of work (the deployment, servicing and recovery of the LiDAR buoy) complies with the legislative obligations of a PCBU and Principal Contractor. Project health and safety documentation prepared by TGS will be shared with all project workers.

11.1.2.2 Vessel contractor

The vessel contractor will be engaged by TGS and will also be considered as a PCBU with a shared duty. As the vessel will be the primary worksite for the floating LiDAR buoy activity, the vessel contractor and master will be responsible for the management and control of the workplace in relation to work, health and safety (WHS) obligations.

Documentation prepared by the vessel contractor that provides health and safety requirements, processes or direction will be shared with all project workers.

11.1.2.3 Shared duties in a contractual chain

Figure 11-1 shows the shared duties between High Sea Wind, TGS and the vessel contractor.

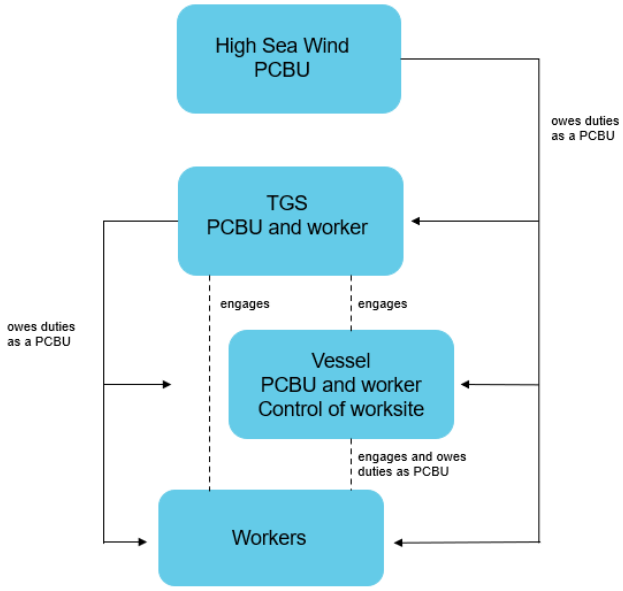


Figure 11-1 The shared duties between High Sea Wind, TGS and the vessel contractor

High Sea Wind is cognisant of legal obligations regarding coordination, communication and consultation with contractors and other duty holders as the operator and having the overall responsibilities for the regulated offshore activity.

TGS, as the contractor engaged in deployment, servicing and recovery of the floating LiDAR buoy will interface with High Sea Wind and the vessel contractor to ensure risks associated with the floating LiDAR buoy activity are identified, assessed and controlled, and all personnel are aware of risks and controls.

The vessel contractor, as the PCBU in control of the worksite(vessel), will interface with TGS and High Sea Wind to ensure all personnel are aware of vessel specific risks and controls.

11.1.3 Duties of other persons at the workplace

Any person involved with licensed offshore activity, including visitors, must take reasonable care of their own health and safety and that of others who may be affected by their action or omissions. They must also comply, so far as they are reasonably able to, with any reasonable instruction that is given by High Sea Wind or contractors engaged by High Sea Wind, to comply with WHS laws.

11.1.4 Officers

Officers are those individuals who make or participate in making decisions that affect the whole, or a substantial part of the business. High Sea Wind, TGS and the vessel contractor officers must exercise due diligence to ensure that all parties comply with their health and safety duties. These duties can relate to strategic, structural, policy and key resourcing decisions in the workplace.

Due diligence includes taking reasonable steps to:

- Acquire and keep up to date knowledge on work health and safety matters
- Gain an understanding of the nature and operations of the work and associated hazards and risks
- Ensure appropriate resources and processes are used to eliminate or minimise risks to work health and safety
- Ensure appropriate processes are in place to receive and consider information about work-related operation and maintenance incidents, hazards and risks and to respond in a timely manner
- Ensure processes for complying with duties and obligations (for example, report notifiable incidents, appropriate training and instruction, consultation with workers) are implemented.

In relation to the LiDAR buoy activity, officer responsibilities would be aligned with the roles outlined in Table 11-1.

Entity	Officer role designation
High Sea Wind	Project Manager HSE Manager Data Manager
TGS – LiDAR buoy contractor	Project Owner Project Manager Operations Manager Project HSEQ Manager Marine Assurance
Vessel contractor	Vessel Master Vessel Crew

Table 11-1 Officer role designation across High Sea Wind, TGS and vessel

11.1.5 Obligation to notify the Offshore Infrastructure Regulator for serious injury or illness, and dangerous incidents when undertaking regulated offshore activity

Under the Offshore Electrical Infrastructure Act and Regulations, OIR must be verbally notified as soon as practicable (within 2 hours if possible) after becoming aware of a serious injury or illness and followed up with written report within 48 hours.

Under the OEI Act and Regulations incidents that must be reported include:

- The death of a person
- A person requiring medical treatment within 48 hours of becoming exposed to a substance
- A person requiring immediate treatment as an in-patient in a hospital
- A person requiring immediate medical treatment for an amputation, serious head injury or serious eye injury, serious burn, removal of skin, electric shock, spinal injury, loss of a bodily function or serious laceration

In addition, notifications under the OEI Act and Regulations must also be made in the instance of a dangerous incident, including:

- An uncontrolled escape, spillage or leakage of any substance
- An implosion, explosion or fire
- Electric shock
- The fall or release from a height of any plant, substance or thing.

The OEI Act extends the definition of dangerous incidents to further include the following notifiable incidents:

- An event that incapacitates a worker for work for at least 3 days
- The following in relation to diving work: a decompression illness, a pulmonary barotrauma, a case of omitted decompression, an event for which a standby diver is deployed for an emergency, except for the purposes of training, exercises, or drills, or a failure of life support equipment or man riding equipment
- An event that a reasonable person would consider needs immediate investigation for its effects on work health and safety.
- Other incidents that require notification under the OEI Act and Regulations include:
    - A circumstance that significantly impaired or has the potential to impair, the operation or structural integrity of licence infrastructure
    - A collision between a marine vessel and any licenced infrastructure
    - A contravention, or apparent contravention of a safety zone determination or a protection zone determination in effect to licence infrastructure
    - An incident that caused or should have caused the, the licence holder to implement the emergency response plan
    - an incident that (i) arose in connection with licence activities carried out in the Commonwealth offshore area; and (ii) resulted, or has the potential to result, in a contravention of the licence holder's obligations under the Environment Protection and Biodiversity Conservation Act 1999.

11.2 Compliance

High Sea Wind has a comprehensive HSE management system to comply with the legislative requirements of the OEI Act and Regulations. The obligations are met and complied with through nominated roles and responsibilities and comprehensive system of policies, procedures and work processes.

12. Management system

12.1 Relevant obligations

The management system must provide for all relevant obligations including compliance with the OEI Act, any instruments under the Act and compliance with the management plan. Regulation 83(1) states the plan must

12.2 Description of management system

This section describes the management system as required under Regulation 83(2).

12.3 Identification, assessment and management of hazards, impacts or risks

12.3.1 Methodologies and standards

As standard risk management process has been adopted by High Sea Wind.
Risk management will be conducted in line with the framework outlined in the Quantitative Risk Cost Analysis Procedure. It defines the techniques for High Sea Wind's quarterly quantification review for the projects risk profile. The goal of each quarterly review is to determine whether the available contingency is still sufficient within reasonable confidence levels to cover the projects risk exposure. The outcomes of this exercise will be shared with the High Sea Wind Project Manager, and relates to the basic approach for designing, implementing, monitoring, reviewing and continually improving risk management processes across the project team. The risk reporting process is central to the risk management framework and will be used regularly by the project team, service providers and contractors to manage risk at all levels.

Surrounding this process are supporting elements for risk management comprising:

- Mandate and commitment
- Risk management architecture
- Implement, communicate and training
- Performance and assurance
- Risk management information system.

High Sea Wind is committed to ensuring full compliance with the Work Health and Safety (WHS) requirements under the Offshore Electricity Infrastructure (OEI) Act and its associated regulations for regulated licensed activities, the deployment and retrieval of LiDAR systems.

To manage the unique hazards associated with LiDAR deployment and retrieval, High Sea Wind implements a comprehensive risk management process aligned with the OEI Act and Regulations. This process begins with identifying potential hazards such as adverse weather conditions, equipment failure, and personnel safety risks. Each hazard is assessed for likelihood and consequence, with controls prioritised to eliminate or minimise risk.

Control measures include ensuring personnel competency and training, use of appropriate personal protective equipment (PPE), secure engineering design of LiDAR systems, and strict adherence to operational limits informed by real-time monitoring of

sea and wind conditions. The process also includes clear procedures for halting activities when environmental thresholds are exceeded.

Regular reviews and continuous improvement of the risk management processes are conducted to address emerging risks or changes in operational conditions. Through this systematic approach, High Sea Wind ensures safe and compliant LiDAR operations, protecting people, infrastructure, and the environment in accordance with the OEI Act and regulatory requirements.

12.3.2 Key health and safety risk management activities

Key health and safety risk management activities considered during the offshore licenced activity include:

- Holding risk workshops and reviews at strategic intervals and critical milestone. Development and ongoing management of the health and safety risk register
- Development and ongoing review of quantitative risk adjusted cost plans and project schedules
- Conducting regular and ongoing health and safety risk management forums across the project (weekly meetings, monthly risk reviews)
- Conducting regular reviews of existing controls to manage the risks in the risk register
- Implementing and overseeing risk management treatment tasks
- Reporting and escalation of significant risks (especially health and safety risks) as part of the monthly project review and reporting processes.

12.3.3 Risk assessment and treatment

Risk assessment (identification, analysis and evaluation) and treatment will be undertaken in a methodical and iterative manner and in line with risk standards.

Consequence and likelihood risk criteria will be used for risk analyses, based on the High Sea Wind risk criteria. This enables a shred understanding of their size and allowing various risks to be compared and evaluated.

Whilst the High Sea Wind corporate risk matrix incorporate several risk categories, the evaluation, prevention and treatment of health and safety risks should be of primary importance throughout the assessment and during the regulated activity.

12.3.3.1 Consequence criteria

Consequence is the degree of impact, linked with the realisation of the risk across a number of impact categories (health and safety, financial, reputation, schedule, etc.). Whilst the primary focus of the evaluation must be health and safety, other risk categories may also be considered when scoring the consequence of a risk, depending on how relevant and appropriate they are for risk management purposes in the broader context of managing overall project risk. Irrespective, health and safety risk must always be evaluated, eliminated (where practicable) and mitigated if elimination is not reasonably achievable (refer 'Hierarchy of Controls' below).

12.3.3.2 Likelihood criteria

Likelihood is the level of possibility that the risk will occur. Although frequence is the primary likelihood criteria, the probability of an event occurring during a projects life also provides value.

12.3.3.3 Risk rating

Risk can be viewed as a function of consequence and likelihood. As the potential exists for multiple consequence and likelihood pairs for each risk, the greatest risk score must be documented for overall risk ranking purposes. In identifying the consequence to be rated within a risk assessment, the following should apply:

- Given the controls are now in place, the most plausible result foreach relevant type of consequence should be identified.
- Where multiple consequences can arise, use the highest rated consequence for rating purposes.

The risk ranking matrix used by High Sea Wind is shown in Figure 20.

12.3.3.4 Risk identification

The identification of project risks serves as the essential building block for risk management. Risk identification needs to be conducted to developed comprehensive list of sources of risks and events that may potentially impact objectives. The risk management process will be explored as follows:

- All material risk sources that may potentially impact objectives will be considered, including dependencies on other business areas within High Sea Wind
- The analysis will continue to identify significant risks by using the findings of earlier risk assessments as guidance for subsequent iterations. Risks will be clearly defined, with no unintentional gaps or overlaps
- Both threats and opportunities will be considered
- Causes and consequences will be examined for each identified risk
- Limitations and assumptions will be questioned
- Each risk will have a designated risk owner
- The risk owners and the treatments (controls and tasks) that address them will be found.

Risks will be reviewed and updated to take account of situations where links between risks or common risk responses suggest risks could be split, aggregated or considered in groups.

Linked risks may be aggregated or considered together, whilst risks with independent components can be divided.

12.3.3.5 Risk analysis

Risk analysis will be conducted to gain comprehensive understanding of each risk so that risk appetite, tolerance and treatment priorities may be properly considered.

The initial approach to risk analysis will be qualitative and quantitative. Risk assessment methods should be used wherever possible and justified, including evaluating the effect of identified risks on achievement of financial and program/time

related objectives or to aid decision-making regarding matters associated with change, project delivery options or strategies.

Both the current level of risk and the residual level of risk must be evaluated. When calculating risk ratings, consideration must be given to any risk management controls that are in place. The residual risk rating will consider the expected effectiveness of planned treatments in lowering the level of risk by reducing the likelihood and/or consequences of the risk.

12.3.3.6 Hierarchy of Controls

Controls will be identified for the risks that are appropriate to reduce the risk as much as possible. The Hierarchy of Controls will be used to address the risks to prioritise controls with the aim to reduce the risk (primarily health and safety risks) as much as practicable as shown in Figure 12-1.

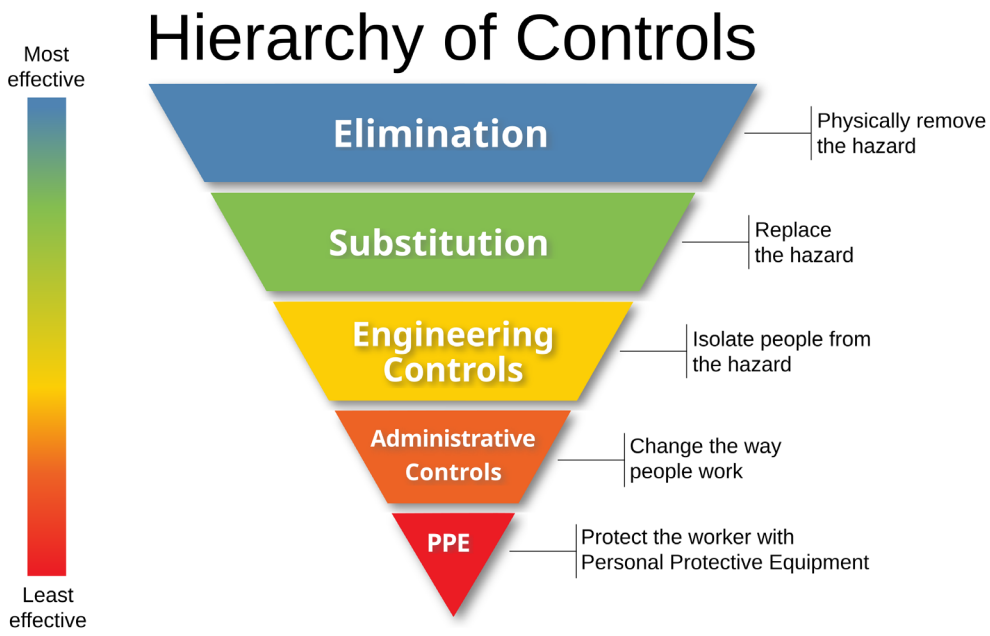


Figure 12-1 Hierarchy of Controls

The risks, ratings, impacts, responsibilities and controls are stepped out in the High Sea Wind Project Risk Register and the TGS Project Risk Register for lidar deployment activities.

In relation to the LiDAR deployment activity, and consistent with Regulation 35 of the WHS Regulations, HSW will address hazards with elimination as the highest priority in our risk management approach. HSW will work closely with TGS and vessel operator to first seek to eliminate the risk posed by the regulated offshore activity wherever feasible during the planning and execution of the LiDAR operations. Only when elimination is not practicable HSW collaboratively assess and implement appropriate control measures to manage the risk. This ensures that elimination remains the primary focus, with controls applied only when necessary, maintaining the highest safety standards throughout the LiDAR deployment.

- In applying the hierarchy of controls, and consistent with Regulation 36 of the WHS Regulations, HSW will minimise health and safety risks from the regulated activity, so far as reasonably practicable, by implementing one or more of the following in order of priority: substitute (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser risk.
- isolate the hazard from any person exposed to it.
- implement engineering controls.

Further, if the risk remains, HSW will, so far as reasonably practicable:

- implement administrative controls.
- ensure the provision and use of suitable personal protective equipment.

A combination of the controls set out above may be used to minimise risks, so far as is reasonably practicable, if a single control is not sufficient for the purpose. Further, the higher the potential severity of the health and safety risk posed, both the number of control layers, and effectiveness of those control layers, must be commensurate with the level of risk.

Following the application of control, if the residual risk rating (according to the HSW risk matrix) remains medium or critical, these risks must be raised with the Ocean Winds HSEQ Manager and TGS Project Manager to collectively agree that the proposed controls are adequate to reduce the risks to an acceptable level or if further risk elimination or mitigation controls are required.

12.3.3.7 Risk monitoring and review

Activities for monitoring and reviewing risks will be conducted to ensure there is no exposure to a greater risk than is desirable or allowable. Monitoring and review will be undertaken, ensuring:

- There is a sufficient range of risks identified for the project area of concern
- Risks are clearly described, remain relevant and have appropriate ownership assigned
- Probability of impact of consequence ratings remain valid
- Risk controls are kept effective and reliable
- The tasks identified to further reduce risks are adequate for the risk level and are conducted in a timely matter
- Changed and emerging risks are identified and documented in the system
- Risks are closed as appropriate
- For risks involving safety, the ‘so far as is reasonably practical’ principle can be demonstrated.

12.3.4 The right to cease work

In accordance with the WHS Act, all workers have a right to cease work where they have reasonable concern to believe that continuing the work would expose them or any other person to a risk of imminent and serious injury or harm to their health. Personnel will report a concern to their direct supervisor, who will consult with duty holders and workers to assess the worksite or concern and identify if controls should be reviewed. Work should only recommence once the concern has been resolved. This right to cease work will be reinforced during the project induction.

12.3.5 Issue resolution

Workplace health and safety issue resolution is a process by which a health and safety issue raised by workers is addressed by the PCBU and all duty holders with a view to ensuring a consistent and effective approach to hazard management. When a health or safety issue arises, all duty holders involved must make reasonable efforts to achieve a timely, final and effective resolution of the issue.

In relation to the floating LiDAR buoy, unresolved issues can be escalated to High Sea Wind if the issue cannot be resolved by TGS or the vessel contractor.

If an issue cannot be resolved by TGS, the vessel contractor or High Sea Wind, the escalation should be taken to OIR.

12.4 Change management

Management of change is included in the High Sea Wind management system. The change process includes communication and consultation with relevant parties, notification to High Sea Wind and contractors of the proposed change, documenting the change through the change management process and forms and seeking approval for the change. A modification that represents a variation from previously approved/defined design, scope. Equipment, material, product, process or organisation deviation from a requirement part of company standard, practice, procedure whether temporary, emergency of permanent nature must follow the Ocean Winds Management of Change process.

Changes to health and safety hazards and risks during mobilisation activities or while offshore can be identified at any time and should be managed in accordance with Ocean Winds Management of Change procedure. TGS and the vessel contractor shall implement their change management processes as appropriate but must ensure changes are immediately assessed and, if necessary, work should be ceased until changes can be appropriately controlled.

All workers should be consulted and informed of the change prior to work recommencing. Updates to risk management documentation should be provided to High Sea Wind via email. Management of Change will be included in project audits to ensure the correct processes are being followed.

12.5 Consultation, communication and cooperation to meet obligations

Ocean Winds' management system outlines the mechanisms to ensure High Sea Wind can meet its legal obligations and includes the methodology to ensure appropriate interfacing between High Sea Wind, TGS, and the vessel contractor during the licence activity.

High Sea Wind promotes effective, open communication and consultation though the organisation and the wider project team, including all contractors. This process includes the communication and provision of information to all workers, as well as a mechanism for internal and external feedback.

High Sea Wind utilises a number of different communication tools described as follows.

12.5.1 Internal communication and consultation

- Internal HSE management system (online platform)
- HSE committee meetings / appointed health and safety representative
- Management meetings
- Consultation with workers through team and project meetings, involvement in hazard identification and risk management activities, documentation review and reporting from employees for improvements, hazard and incidents and completing investigations
- Issue of all WHS-related project documentation to all parties including revisions, including the management plan
- Safety alerts and publications as they apply to the regulated activity
- Development of risk register and risk documentation
- Consultation and Participation Register.

12.5.2 External communication

- Planning and kick off meetings with contractors
- Hazard identification (HAZID) workshops and risk assessments
- Mobilisation meetings, including presentation of the scope of work, risks and mitigation (from HAZID workshops), emergency scenarios and response, awareness on local fauna and environmental protection
- Scheduled meetings with contractors
- Pre-mobilisation/ mobilisation activities, for example project induction, vessel induction, pre-start, toolbox meeting
- Safety alerts and publications relevant to works
- Regular reporting and check-ins with field work staff
- Continuous offshore activities, for example daily pre-start, toolbox meeting, progress reporting
- Post trip activities, for example debrief, lessons learned.

During offshore work, communication and consultation will occur on the vessel daily through the pre-start and daily toolbox meeting, where the tasks are discussed for the day and safety documentation is reviewed. All workers will be involved in the daily toolbox meeting which provides and promotes an open forum for discussion and review of the daily activities.

High Sea Wind is aware of its obligations in relation to the formation of health and safety committees or appointing health and safety representatives. If, during the licence activity a worker wants to appoint one of these arrangements, High Sea Wind will work with TGS and the vessel contractor to facilitate arrangements.

Workers are involved and consulted throughout the project work and are included in development and review of HSE procedures and risk assessments, meetings and hazard identification processes. Workers are also involved in emergency response initiatives and are encouraged to identify and improve WHS processes in the workplace.

High Sea Wind also encourages workers to raise safety observations through an online application form by scanning a QR code (to be made available on the vessel). By doing so, the observation raised communicates to the High Sea Wind Head of HSEQ for consideration, which could lead to development of an action plan if required. Safety observations can include positive observations where applicable.

Workers also have the right to cease work should a workplace situation arise where the worker is unsafe to continue to conduct work. In this circumstance, communication and consultation for all workers involved in the works shall occur to rectify the situation and ensure the works can be carried out safely for all of those involved.

12.6 Roles and responsibilities

Project roles and responsibilities for High Sea Wind personnel, High Sea Wind representatives and all personnel and contractors are described in Table 12-1.

Role	Company roles and responsibilities
Ocean Winds CEO	The Ocean Winds CEO holds the ultimate responsibility for the Company's Health, Safety and Environmental performance. With regards to Risk Management, this includes ensuring that risk management culture and approach is developed.
Ocean Winds Head of HSEQ	The Ocean Winds Head of HSEQ oversees the implementation of the CEO HSEQ strategy and ensures compliance to Ocean Winds requirements and legal obligations: With regards to risk management, the Head of HSEQ: • Ensures that the process is developed for all geographies and for all stakeholders involved. • Maintains up to date risk assessment methods and coordinate its developments with internal expertise as required. • Ensures coordination among projects and ensure the Corporate Risk Register is kept updated. • Performs regular audits of projects and contractors to measure implementation and when necessary provides support to develop risk assessment methods. The Health, Safety and Environment Manual, the Head of HSEQ also: • Maintains a master document register for HSEQ Documentation, • Maintains a project legal register.
High Sea Wind Project Manager	The Project Manager is responsible for the implementation of risk management, emergency management and associated action plans throughout the life of the project. This includes all levels of risk assessment and emergency management including stakeholders, contractors and employees.
All personnel and contractors	Personnel and Contractors are required to participate in project risk assessment and controls throughout their organisation and scope of work.

Table 12-1 Company roles and responsibilities

12.6.1 Contractor selection

In accordance with High Sea Wind' management system requirements, prequalification and selection of contractors is conducted using a risk approach and assessment based on a contractor's ability to deliver a product, equipment or service in a safe, healthy and environmentally acceptable manner. High Sea Wind will only engage a contractor once they have been prequalified and approved, and all vendors must comply with the HSEQ Requirements for Vendors.

- Supplier prequalification and approval is conducted in accordance with the following key factors:

- Nature and scope of the work to be performed
- Potential for hazards and risks associated with the scope of work
- Assessment of supplier training and competency
- Assessment of supplier health and safety documentation
- Suitable insurances in place
- Mature WHS management system
- Compliance with legal obligations
- Demonstrated capacity and capability to execute the work.

High Sea Wind will monitor contractor performance via scheduled audits and reviews.

12.6.2 Floating LiDAR contractor

High Sea Wind has engaged TGS as the floating LiDAR contractor. TGS roles and responsibilities are described in Table 12-2.

Role	TGS responsibilities
TGS Project Owner	Accountable to TGS VP Wind and Metocean • Overall accountability for the project • Providing visible safety leadership • Satisfying contractor corporate, contractual and legislative requirements • Overview of contracts from a commercial and technical stance • Acts as Deputy Project Manager • Reviewing all incident reports, involvement in investigations and identification and implementation of corrective actions or follow-up activities, where applicable.
TGS Project Manager	Accountable to TGS Project Owner • Providing visible safety leadership • Safe execution of the project work scope • Ensure the development, implementation and continual review of the project plans • Satisfying contractor corporate, contractual and legislative requirements • Consulting with the client and other contractors to collectively manage risk • Coordinating project plan review meetings • Ensure risk documentation is reviewed • Verifying compliance with project plans and risk documentation • Ensure that records are maintained • Ensure the implementation of TGS and High Sea Wind procedures • Provide appropriate resources and ensure only adequately trained and competent employees are assigned to projects • Ensuring all contractor personnel have the requisite skills, training and competence to carry out their tasks • Maintain proactive, open and clear communication to ensure milestones are achieved.
TGS Operations Manager	Accountable to the TGS Project Manager • Ensure the implementation and compliance to project plans • Safe execution of project scope of work • Providing advice to personnel on project plans • Reviewing and approving risk documentation, for example JHA's

Role	TGS responsibilities
	• Responsible for all employees and contractors at the site under TGS control • Responsible for providing TGS workers with the management plan. • Responsible for providing a deployment plan to High Sea Wind prior to mobilisation, for review and approval. • Facilitation of a HAZID workshop, involving High Sea Wind, TGS and vessel contractor representatives. • Ensure work is conducted in accordance with the TGS and High Sea Wind management system, the management plan and the TGS project HSSEQ plan. • Identifying and reporting any hazards, accidents/incidents and near misses to TGS, High Sea Wind and vessel master • Responsible for complying with the non-conformity and corrective action procedure • Looking out for their own safety and that of others.
TGS Field Team	Accountable to TGS Operations Manager • Complying with project plans as well as the TGS and client management system requirements • Understanding and complying with the contents and intent of all TGS HSE documents • Reporting any hazards, accidents/incidents and near misses to the TGS Operations Manager and/or Vessel Master • Adhering to the requirements of the risk management processes • Looking out for their own health and safety and that of others
TGS HSSEQ Manager	Accountable to TGS VP Wind and Metocean • Promoting HSSEQ throughout the project • Providing advice on the project plans and TGS management system • Ensuring the TGS project plans are consistent with client policies and procedures • Satisfying TGS corporate, contractual and legislative requirements • Ensuring hazard management has been demonstrated by all parties involved • Ensuring all TGS field staff have the requisite skills, training and competency to carry out their tasks and can respond in an emergency situation as required • Setting HSSEQ goals and objectives of work • Monitoring performance of work against HSSEQ goals • Reporting relevant incidents to the regulators • Assisting with incident investigation • Facilitating rehabilitation and return to work process as required
TGS Data Assurance	Accountability to TGS VP Wind and Metocean • Monthly data reports • Project managing the reporting phase • Ensure that the report maintains high quality standards, and is completed on time, within budget and in accordance with the company HSSEQ system • Quality control/checking of metocean data (measured and modelled), metocean data generation, analyses and interpretation, design criteria determination (for offshore structures, facilities and pipelines), technical report preparation and writing

Table 12-2 TGS roles and responsibilities

12.6.3 Vessel contractor

The vessel contractor has not yet been appointed. Notwithstanding, key vessel roles and responsibilities are described in Table 12-3 based on experience.

Role	Vessel contractor responsibilities
Vessel master	Accountable to vessel management •Overall responsibility for safe operation of vessel at sea •Overall responsibility for management and co-ordination of emergency situations •Responsible for all aspects of health and safety onboard the vessel, including risk identification, assessment and management •Submission of appropriate vessel related health and safety documentation including emergency response plans and information to TGS and High Sea Wind as necessary, in the planning stage and prior to pre-mobilisation activities. •Responsible for providing a copy of the management plan and other documentation to the vessel crew. •Ensuring all safety systems and features onboard are operational •Ensuring all lifting equipment (including rigging) has current certification •Reporting and investigating all hazards, accidents/incidents and near misses to the TGS Operations Manager •Reporting the requisite skills, training and competence of the vessel crew •Ensuring all marine crew have the requisite skills, training and competency to carry out their tasks and can respond in an emergency situation as required •Monitor for the vessel's proximity to whales or dolphins, and implement avoidance actions (as per EPBC Act obligations) •Understand and comply with the contents of this document and other HSE documentation (for example HSSEQ plan, emergency response plans) •Reporting all incidents as required to relevant bodies.
Vessel crew	Accountable to vessel master •Participation in the HAZID workshop and any other hazard and risk assessment activities •Conducting their activities in a safe and responsible manner in accordance with the vessel HSE management plan •Understanding and complying with the contents and intent of this document •Reporting any hazards, accidents/incidents and near misses to the TGS Operations Manager, and/or Vessel Master •Looking out for their own safety and that of others.

Table 12-3 Vessel contractor roles and responsibilities

TGS will liaise with High Sea Wind on the selection of an appropriate vessel contractor during the planning of all work. As a minimum:

- The vessel will have current IMCA certification.
- The vessel shall be capable of towing the LiDAR buoy (4.5T) in open ocean, deploying the anchor system (3T) and retrieving the buoy and mooring system once the activity is complete.

- The capacity of all hardware shall be known and have current certification.
- The vessel shall have adequate accommodation for at least two TGS personnel and one client representative.
- TGS will confirm that all crew members are suitably trained and certified for the intended positions.

12.7 Incident management

12.7.1 Initial incident response

In the event of an emergency, the safety of personnel will always be the first priority and the treatment of any injured workers.

The High Sea Wind ERP describes the response to a variety of emergency response scenarios.

In essence, preservation of all person's safety is paramount with any of the emergency or incident scenarios and the priority will always be to ensure the safety and wellbeing of all workers and others involved. The initial response will vary depending on the incident or scenario.

12.7.2 Incident communication protocols

The person who discovers or who is directly involved with the incident shall raise the alarm and notify his/her direct manager.

If the incident results in injury, a first aider is despatched to provide initial treatment.

The incident notifications are broken down into Tier 1 or Tier 2 incident which indicates the response as per Table 12-4. Tier 2 incidents will be reported to the OIR and other relevant personnel and regulators as per the notifications process outlined in Section 10.4.2.

In the event of an emergency, the following tiers determine the level of response required to manage the incident and recover from the emergency. Note that the table below describes the HSW response levels, and the contractors' may differ in terminology and content.

Incident category	Description of category
Near Miss	An unplanned event that did not result in injury, illness, or damage but had the potential to do so. HSW must be notified following the normal incident notification process. Examples of NM type events: • All instances of minor damage • Limited external assistance required • No evacuation of personnel required • No emergency services required
Tier 1	Events that require additional support are escalated by site teams and handled by the Incident Commander, with close involvement of the Contractor. The HSW IMT must be notified. This category includes any incidents that are not notifiable to the OI under the OEI Act or WHS legislation.

Incident category	Description of category
	Examples of Tier 1 type events: • Non-emergency medevac, injury or illness that is treatable on site • Small, local vessel-based oil spill controllable by vessel/Contractor with onboard equipment.
Tier 2	Events with serious, real, or potential risks to individuals' safety or health, asset damage, environmental impact, or reputational damage Additional resources required for support, emergency services, and/or the JRCC. Operations coordinated by the Incident Commander and Contractor with support from HSW IMT. This category includes all incidents that are notifiable to either the OIR under the OEI Act or WHS legislation. Examples of Tier 2 type events: • Emergency medevac • significant environmental impact requiring additional support from AMSA, regional/state agencies, or AMOSC intervention. • vessel in distress • Vessel collision with licence infrastructure • significant asset damage • stakeholder impact
Tier 3	Events that require authorities to assume control Tier 3 will have major consequences to personnel and/or asset and will require assistance from the Emergency Services and or JRCC. The JRCC coordinates operations in conjunction with the Incident Commander and the Contractor; HSW IMT will provide support. This category includes all incidents that are notifiable to either the OIR under the OEI Act or WHS legislation. Examples of Tier 3 type events: • Fatality or life-threatening injuries • Major damage to, or loss of, an asset. • Major Environmental impact requiring national response resources under NatPlan, potentially with Defence/Air Support. • Media interest, 3rd party shipping striking, air crash, fatalities, members of the public involved.

Table 12-4 Incident tiers

The employee's direct manager reports the incident through the OWN HSEQ Tool to the HSSEQ department. The HSSEQ department will report the incident to the Prevention Service.

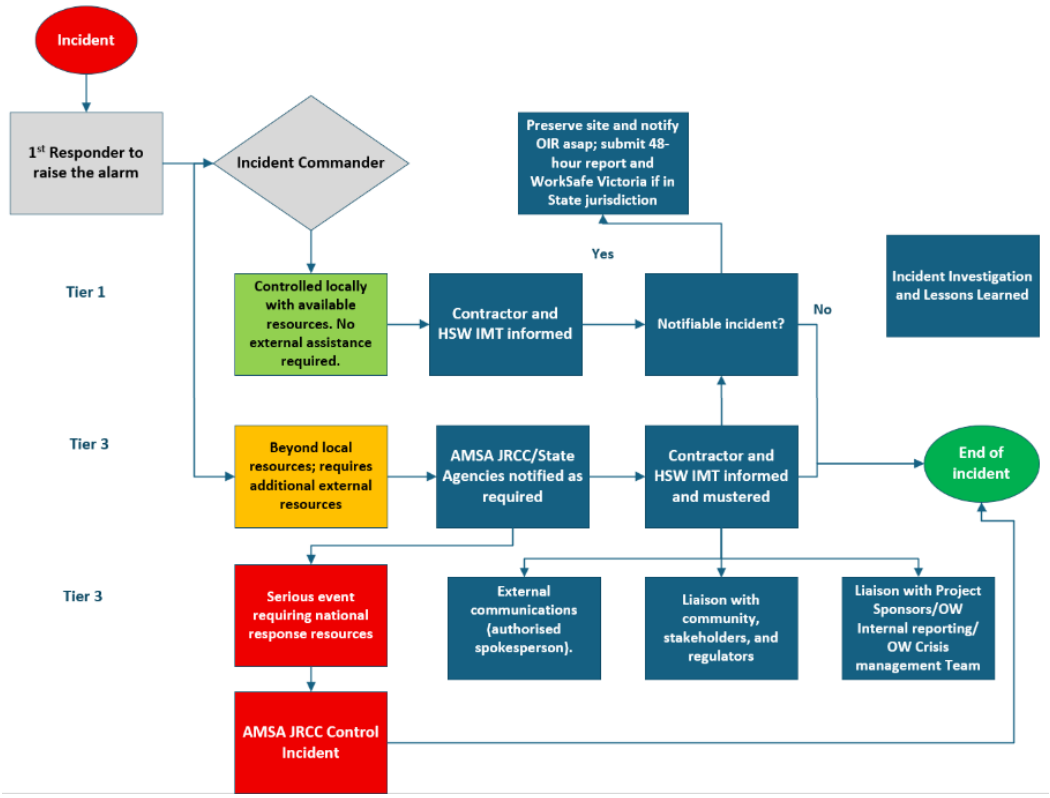


Figure 12-2 Incident notification protocol

12.7.3 Notifiable incidents

Where a notifiable incident has occurred, work should cease, and the scene preserved (if safe to do so) until the regulator(s) investigate or advise otherwise.

The OIR and WorkSafe Victoria will be notified immediately via telephone after becoming aware of a notifiable incident which has arisen from the conduct of the operation. High Sea Wind Project Manager has the responsibility to contact and notify the OIR, the OIR can be contacted on +61 (0)8 6188 8700 should a notifiable incident occur.

Notice will be provided to the relevant regulators via the fastest possible means, by telephone, email or writing. In accordance with Regulation 161, incidents reported to the OIR will be followed up by a written report within 48 hours.

Records of notifiable incidents will be maintained by High Sea Wind for at least five years from the last day that the incident is reported to the OIR. This duty extends to other people who may be at risk from work undertaken by High Sea Wind or contractors.

Internal incident reporting and investigation should continue for all incidents. Contractor incidents will require the contractor to submit a suitable incident investigation and report to High Sea Wind. High Sea Wind will ensure all actions are followed and closed out.

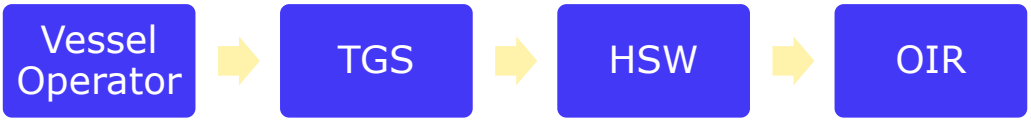


Figure 12-3 Notifiable incident protocols

12.7.4 Reporting and notifications

12.7.4.1 Reporting

All contractor health and safety reporting will be part of High Sea Wind monthly and annual reporting and each month these will be submitted through the High Sea Wind Project Manager and in turn to the High Sea Wind WHS department for collation of business HSEQ statistics and performance.

TGS will report to High Sea Wind with the following information on a daily basis for the licence activities:

- Workhours
- Personal injuries (first aid, restricted work, medical treatment and lost time injuries)
- Other incidents including near miss, pollution, damage to equipment or assets
- Identification of high potential events
- Leading indicators such as management visits, safety observations, inspections, drills, toolbox meetings, risk assessments, additional HSE training.

In addition to internal reporting High Sea Wind as a G+ member shall provide their health and safety incident data for all their offshore wind farm sites across the world from development to decommissioning stage on a quarterly basis.

12.7.4.2 Notifications

All incident notifications follow the process in Figure 12-3 and any notifiable incidents are reported to the Regulator.

Activity pre-commencement and post-completion notification is required to the OIR under the OEI Amendment Regulations.

Table 2-5 in Section 2.6 provides further details of reporting requirements relevant to the licence activity with other regulators, government agencies and/or industry bodies.

12.8 Qualifications, competencies and supervision

The High Sea Wind management system includes requirements to ensure all workers (including contractors) hold the appropriate qualifications, training and competency to complete their work. Where national and local statutory requirements and associated codes of practice prescribe standards, these must be followed and take precedence.

The provision of training that meets competency requirements allows High Sea Wind to provide assurance that personnel are competent to operate and maintain the worksite in a safe and healthy manner, meeting High Sea Wind' health and safety policies and objectives.

Training requirements shall be identified based upon:

- HSE competency as defined by High Sea Wind and contractors
- Specific training for personnel to eliminate or control hazards to which they are exposed while completing their roles and responsibilities
- Legislative requirements and the regulated offshore activity
- Employee development needs.

Training programs for individuals shall be developed based on position requirements and a training needs analysis or supplied as part of the contractor prequalification, engagement and onboarding.

No workers will be permitted to perform work they are not trained for. Training requirements have been identified in the HSE Manual and TGS Project HSE management plan.

12.8.1 Induction

Induction is the mechanism through which employees and contractors are introduced to High Sea Wind, the project, the role expectations and skills and behaviours required. The purpose is to support employees and contractors to accelerate engagement, effectiveness, productivity, and successful health and safety outcomes.

High Sea Wind have the following induction structure:

- General induction: for High Sea Wind new start employees
- Contractor induction for High Sea Wind contractors: legal obligations and High Sea Winds regulated offshore activity, emergency management, risk management, incident reporting and management, hazards, overview of High Sea Winds project.
- Project induction/work scope: project specific requirements for all project workers (for the licence activities to be conducted by TGS). This would include a review of relevant sections of the management plan, risk management documentation, emergency response plans, marine fauna interactions and EPBC Act obligations.
- Vessel induction: conducted by the vessel contractor for all personnel working on the vessel including vessel emergency management, equipment and locations, vessel safety processes, crew and vessel operations.

12.8.2 Task specific training or qualifications

Specific training or qualifications unique to a role will be assessed and addressed as role specific training. These roles include vessel skippers and crew, lifting operators and equipment operators. Specialised training will be required for the worker to perform that role, for example high-risk work licence, skippers ticket. Emergency response training requirements and include first aid, STCW95 and BOSIET.

12.8.3 Supervision of workers

The level of supervision provided depends on the risk involved as well as the competency of workers to identify and handle them.

Duty of care obligations are heightened where young and inexperienced employees are new or inexperienced. Effective supervision is the general direction, coordination and oversight of the onsite work processes and involves:

- When works can proceed

- Overall coordination and general instruction for work to not endanger workers
- Upon identification of a dangerous situation issuing prompt directions necessary to safeguard workers
- Monitoring general work conduct for compliance with HSE procedures and risk assessments.

High Sea Wind will work with contractors to ensure adequate supervision is included in resourcing for projects. For the licence activity, the TGS Operations Manager will be the supervisor responsible for TGS workers. The Vessel Master will be the supervisor responsible for all vessel workers.

12.8.4 Training records

Records of valid training and competency shall be submitted by contractors to High Sea Wind prior to mobilisation. Examples of training that would be expected as part of the licence activity scope include:

- Vessel Master: Training and qualification (for example STCW95 including first aid)
- Vessel crew: Boating and crew training to support Vessel Master (for example STCW95)
- TGS field team: First aid, emergency response capability
- All vessel passengers: Valid Sea survival certificate (STCW/GWO/BOSIET) and medical certificate.

12.9 Monitoring, auditing and recording

12.9.1 Internal audits

High Sea Wind conducts internal audits of the management system and projects at set intervals and in accordance with the annual internal audit schedule. Internal audits include monitoring and audit of High Sea Wind contractors. The audit schedule includes audit dates, locations, audit scope, auditees and projects. The audits will be relevant to licensed offshore activity in deployment of the lidar buoy and ensure the activity is in compliance with High Sea Winds Management System and all legal requirements.

Internal audits are conducted utilising pre-prepared audit checklists incorporating legal requirements, ISO 45001 requirements and High Sea Wind best practice approaches to health and safety management. Following an internal audit, a report will be prepared which outlines the scope, auditees, requirements, findings and actions.

12.9.2 Health and safety observations

Safety observations allow all workers on the vessel to report a hazardous condition, occurrence or any positive safety behaviours or observations during the offshore regulated activity. Safety observations should be reported to the TGS Operations Manager, who will document and submit to High Sea Wind. The TGS Operations Manager and workers can discuss observations during the daily toolbox and pre-start meetings and High Sea Wind and TGS will discuss observations during project and/or operational meetings.

12.9.3 Inspections

Inspections will be conducted on the vessel prior to and during the regulated activity. TGS and the vessel contractor must have their own inspection process in place and provide written reports of all inspections completed to High Sea Wind. Inspection reports should identify any non-conformances or issues, along with proposed corrective actions.

12.9.4 Health and safety meetings

TGS will facilitate health and safety as an agenda item, which may be included as part of another project meeting. Representatives from High Sea Wind, TGS and the vessel contractor (where practical) should be in attendance. The meeting should include a review of project performance, health and safety events, contractor performance, issues, changes to risk management documentation and any development or improvement plans.

12.9.5 Event reviews

Incidents, hazards and near misses should be reviewed by management representatives from High Sea Wind, TGS and the vessel contractor to identify any potential non-compliance. Investigations should identify corrective actions, which should be implemented as soon as practicable. Reviews of emergency response plan effectiveness will be conducted as required for assessment of any response initiated.

12.9.6 Communication and consultation

Communication and consultation activities can also identify potential compliance issues. Any issues identified via these activities should be addressed by High Sea Wind, TGS or the vessel contractor, dependent on the issue and who is responsible for corrective actions.

12.10 Identification and management of non-compliance

Non-conformances can be identified by many means including:

- Routine inspections and walk arounds
- Incident and hazard reports
- WHS audits
- Incident Investigations
- HSE meetings
- Emergency drills
- Complaints.

Non-conformances, observations and improvements identified by High Sea Wind, TGS or the vessel contractor are to be reported to High Sea Wind and recorded in the Non-Conformity, Observation, Corrective and Improvement Report and attached into OWN HSEQ tool.

The HSEQ department monitors the implementation of the established corrective and improvement actions. It will also verify where possible to ensure implementation. Once implementation is verified, the action is closed in the OWN HSEQ tool, and the form will also be closed.

12.11 Process improvement

Continual improvement of High Sea Wind' management system and the management plan is achieved through monitoring, review, assurance, inspection, audit and change management activities. Outcomes resulting from monitoring, compliance, assurance and audit activities will be shared with all project contractors to foster a positive project workplace health and safety culture.

The management plan will be updated reviewed on a six-monthly basis or when there is significant change to capture any updates to legislative requirements or standards, stakeholder feedback, changes to technology or equipment updates, updates to internal documentation and policies, outcomes of change management processes and/or changes in contractors. This document will also be updates as new activities requiring a management plan commence.

High Sea Wind will use the lessons learnt from the LiDAR buoy licence activity to inform revisions of the management plan for future phases of the project.

12.12 Requirement to implement management system

HSW will implement the management system set out in the management plan.

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