Iberdrola Australia

Aurora Green Offshore Wind Project

Feasibility License Management Plan Summary

VERSION	DATE PUBLISHED
1.0	20 June 2025

Acknowledgement of Country

We would like to acknowledge the Gunaikurnai people as the Traditional Custodians of the land and sea on which the proposed Aurora Green Offshore Wind Project is located, and recognise their continuing connection to land, sea, culture and community.

We pay respect to Elders past and present.

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List of Terms and Acronyms

Term	Definition
AIS	Automatic Identification System
ALARP	As Low as Reasonably Practical
AMMC	Australian Medtech Manufacturing Centre
AMSA	Australia Maritime Safety Authority
AtoN	Aid to Navigation transponder
CRO	Control Room Operator / Chief Risk Officer
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEECA	Victoria's Department of Environment, Energy, and Climate Action
DWR	Direction Waverider
EPBC	Environment Protection and Biodiversity Conservation
ERP	Emergency response plan
ESD	Ecologically sustainable development
FL	Feasibility Licence
Floating LiDAR Buoy	Floating Light Detection and Ranging
GIS	Geographic information system
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
GPS	Global Positioning System
HIAB	Hydrauliska Industri AB
HSE	Health, safety and environment
HSEQ	Health, safety, environment, and quality
IALA	International Association of Lighthouse Authorities
ISM	International Safety Management
LED	Light-emitting diode
LiDAR	Light Detection and Ranging
MMO	Marine Mammal Observer
MoC	Management of change
NOPTA	National Offshore Petroleum Titles Administrator
OEI	Offshore Electricity Infrastructure
OIR	Offshore Infrastructure Regulator
OW	Offshore Wind
OWEV	Offshore Wind Energy Victoria
OWF	Offshore Wind Farm
PIC	Person in Charge
RSOL	Rated Safe Operating Load
SETFIA	South East Trawl Fishing Industry Association
SOLAS	Safety of life at sea
SS	Stainless Steel

Term	Definition
SSIA	Southern Shark Industry Alliance
VFA	Victorian Fisheries Authority
VR Fish	Victorian Recreational Fishing Peak Body
WA	Western Australia
WHS	Work Health and Safety

01.
Introduction

1 Introduction

This summary of the Feasibility License Management Plan for the Aurora Green Offshore Wind Farm has been prepared in accordance with the requirements of Regulation 77 (1) of the Offshore Electrical Infrastructure Amendment Regulations 2024 (OEI Regulations).

1.1. Project Overview

Iberdrola Australia OW 2 Pty Ltd, part of the Iberdrola Group, plans to develop and operate the Aurora Green Offshore Wind Farm (OWF) off the Gippsland coast in Victoria, Australia. The project will be located in Commonwealth waters within Declared Area OEI-01-2022 and includes offshore wind turbines, offshore substation(s), inter-array and export cables, and an onshore substation. It will connect to an onshore grid connection point in Gippsland, to be developed by VicGrid.

Feasibility Licence FL-012 for the Project (referred herein as the Licence) was granted to Iberdrola Australia on 15 July 2024 by the Minister for Climate Change and Energy in accordance with the *Offshore Electricity Infrastructure Act 2021* (OEI Act).

To support the feasibility assessments and planning for the Project, Iberdrola Australia will undertake a Wind and Metocean Measurements Campaign to collect meteorological and oceanographic data in the Feasibility Licence Area. The proposed activities will inform the analysis and characterisation of the wind resource, meteorological and oceanographic conditions, and in turn inform the technical studies, feasibility assessment and design process, while ensuring safety and reliability of the Project, as well as minimise potential impact on the environment. Further information can be found at the Aurora Green Offshore Wind Project website (Offshore Wind | Iberdrola Australia).

1.1.1 Location

The Aurora Green OWF Feasibility Licence Area (Licence Area) is located approximately between 25 kilometres (km) and 50 km from the shoreline. The Licence Area is within the Gippsland Declared Area (OEI-01-2022) and encompasses an extent of 700 km^2 in Commonwealth waters (Figure 1-1 and Table 1-1). The deployment location of the proposed Wind and Metocean Measurements Campaign activities will be undertaken within the Licence Area, approximately 32 km from the Victoria coastline.

Table 1-1: Licence Area Coordinates (Datum: GDA94)

Point	Latitude	Longitude
P1	38° 49’ 54.84” S	147° 23’ 03.92” E
P2	38° 41’ 23.07” S	147° 12’ 37.95” E
P3	38° 30’ 34.54” S	147° 25’ 23.94” E
P4	38° 33’ 04.49” S	147° 28’ 30.25” E
P5	38° 35’ 24.00” S	147° 36’ 36.00” E
P6	38° 35’ 49.87” S	147° 38’ 29.98” E
P7	38° 38’ 37.96” S	147° 37’ 06.35” E
P8	38° 40’ 45.35” S	147° 35’ 52.45” E
P9	38° 43’ 47.70” S	147° 33’ 02.79” E
P10	38° 47’ 12.19” S	147° 27’ 21.41” E

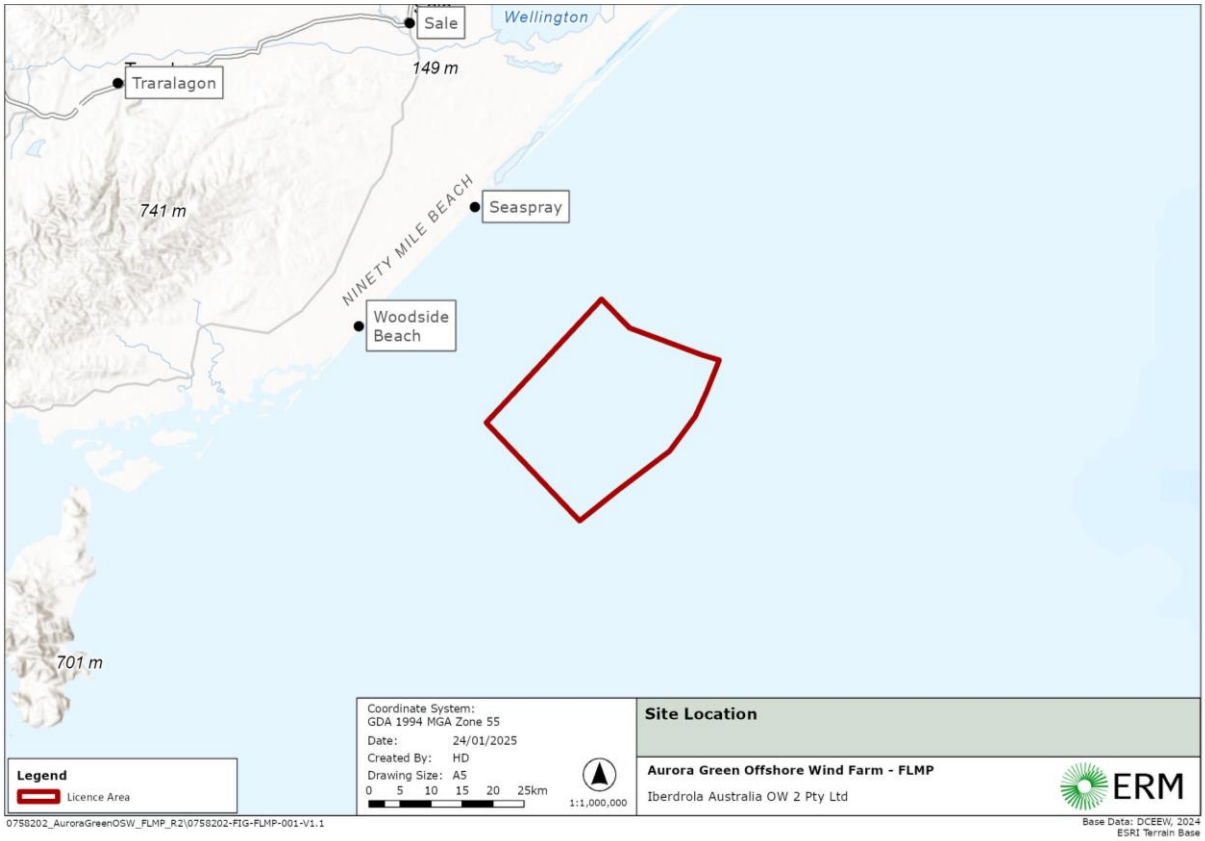

Figure 1-1: Aurora Green OWF Feasibility Licence Area

1.2 Purpose of the Management Plan

The purpose of the Management Plan is to document and demonstrate that:

- Appropriate management controls are implemented to reduce impacts and risks.
- The Feasibility Licence activities are carried out in a manner consistent with the OEI Act and associated legislation and Regulations.
- The Feasibility Licence activities are carried out in a manner consistent with the principles of ecologically sustainable development (ESD) (as defined in Section 3A of the EPBC Act).
- The Feasibility Licence activities are assessed and managed in accordance with international standards for risk assessment and management AS/ISO 31000:2018.
- The Feasibility Licence activities are carried out in accordance with Iberdrola Australia's relevant health, safety, sustainability, environment and quality policies, procedures and requirements.

1.3 Document Structure

This document summarises the Management Plan approved by the Offshore Infrastructure Regulator on 22 May 2025. This Summary has been structured to reflect the process and requirements of the Regulation 77(1) of the OEI Regulations and is outlined in Table 1-2.

Table 1-2: Document Structure

Management Plan Summary Content	Section
Activities and operations	0
Relevant structures, equipment and property	3
Maintenance of structures, equipment and property	4
Decommissioning, removal, and remediation	5
Stakeholder engagement strategy	6
Consultation carried out	7
Conditions of the Licence	8
Obligations under the EPBC Act	9
The management system	10
Work health and safety	11
Emergency management	12
Compliance with record keeping requirements	13
Notifications to the Offshore Industry Regulator (OIR)	14
Management Plan may apply, adopt or incorporate other instruments	Not relevant

1.4 Licence Holder Details

Iberdrola Australia OW2 Pty Limited (Iberdrola Australia)

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Sydney NSW 2000

02. Activity Description

2 Activity Description

The Wind and Metocean Measurements Campaign activities relevant to the Feasibility Licence are described below.

2.1 Overview

The proposed Wind and Metocean Measurements Campaign will provide a basis for wind resource and metocean analyses to inform the project development and design process.

2.2 Wind and Metocean Measurements Campaign

Wind and metocean data collection will be conducted using three main pieces of equipment:

- a Floating LiDAR Buoy,
- a wave buoy, and
- a seabed frame.

This equipment will collect wind, waves, currents, water levels, meteorological and oceanographic data in the Licence Area.

2.2.1 Layout of Activities and Equipment

Site selection for deployment of metocean equipment was undertaken to avoid interaction and interference with commercial fisheries and vessels as far as practicable while effectively and efficiently capturing metocean data (Figure 2-1).

A Notice to Mariners (NtM) will be published prior to the deployment of wind and metocean measurement equipment where mariners will be requested to maintain a 500 m minimum distance from all deployed equipment. The purpose of this is to both protect the deployed equipment and reduce the risk of equipment interaction with other marine users, and thus protect the infrastructure, as well as vessel and human safety.

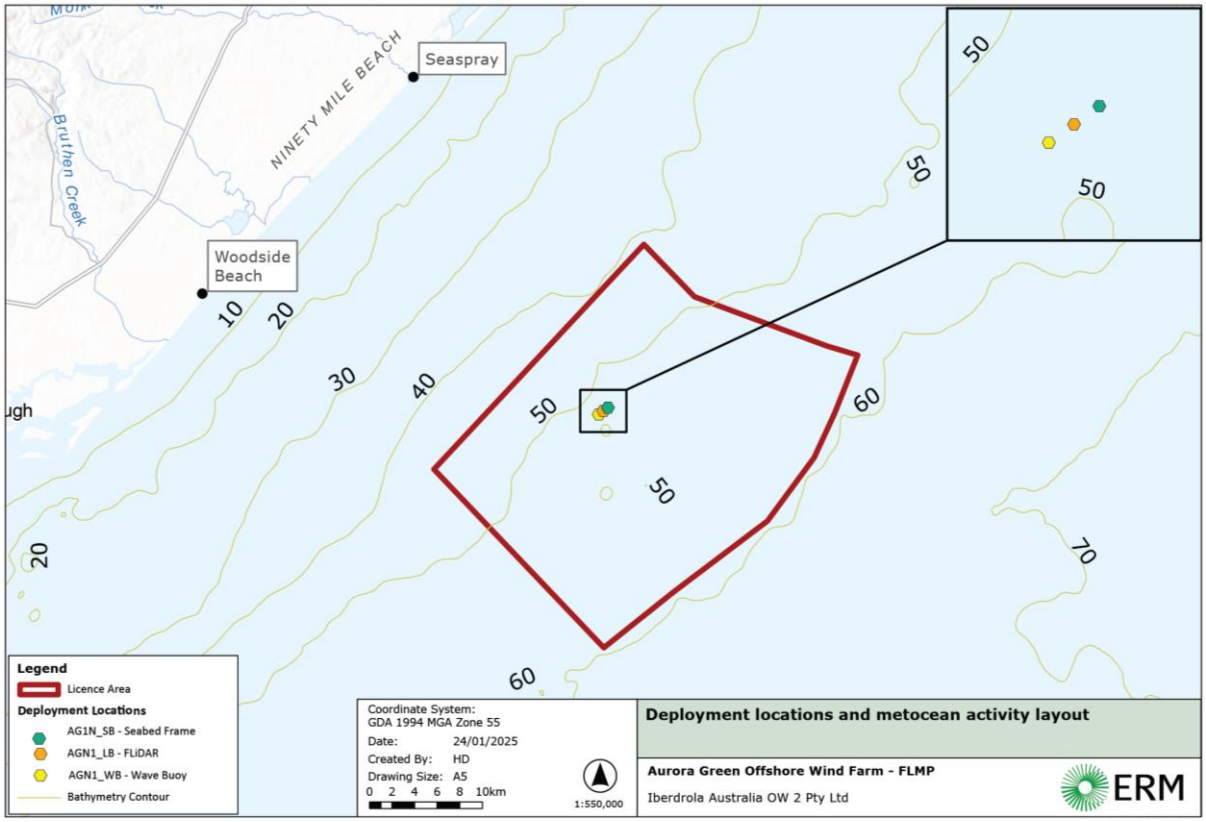

Figure 2-1: Deployment locations and layout of Metocean equipment

2.3 Proposed Equipment

2.3.1 Floating LiDAR Buoy

The Floating LiDAR Buoy (Figure 2-2) is an industry standard wind and metocean data acquisition equipment that utilises Light Detection and Ranging (LiDAR) technology on a floating platform for in-situ measurements of wind speed and direction along the vertical profile in offshore marine areas.

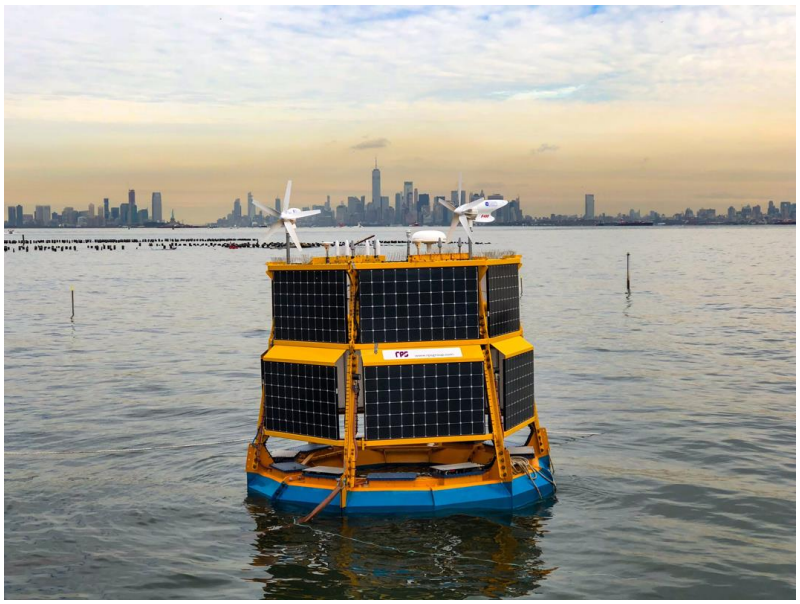

Figure 2-2: RPS Floating LiDAR Buoy (RPS Group 2025)

One RPS Floating LiDAR 3.5 buoy (Floating LiDAR Buoy; Table 2-1) will be deployed within the Licence Area. The Floating LiDAR Buoy will be equipped with a number of navigation aids to mitigate the risk of vessel interaction, including Dual (Differential) GPS (Global Position System) and an Aid to Navigation transponder (AtoN) Automatic Identification System (AIS, Type 3) unit providing information about the buoy position to passing vessels. The buoy floater is made of yellow polyethylene and is equipped with the following signals as a standard configuration following the International Association of Lighthouse Authorities (IALA) and Australia Maritime Safety Authority (AMSA) regulations:

- Two self-contained Sealite 5nM yellow lanterns, 5 flashes every 20 seconds.
- Special mark, St Andrew cross (X- yellow).

Service trips will be conducted every six months for inspection, maintenance and repair of the Floating LiDAR buoy as detailed in Section 4.1.2.

Table 2-1: RPS Floating LiDAR 3.5 Buoy Specifications

Specification	Detail
Dimensions (H x W x L)	7.6 m x 3.5 m x 4.2 m
Floating Lidar System	RPS Floating LiDAR 3.5 Buoy
LiDAR sensor type	ZX 300M LiDAR
Other sensors	• Air temperature • Relative humidity • Air Pressure • Rainfall sensor • Water temperature • Water conductivity • Surface winds • Current profiler • Wave sensor • Chlorophyll
Power systems	Solar power generation and wind turbines

Mooring Design

The mooring system is pre-assembled and secured to the Floating LiDAR Buoy before deployment. It follows industry-standard design, with potential refinements during final engineering.

Key Components:

- Stainless steel chain connected to the buoy
- Rubber cords for shock absorption and a nylon safety tether
- A subsurface float (~13 m below sea level)
- The float is secured to a 3.5 T anchor
- Chain and 1 kg float near the anchor maintain constant line tension

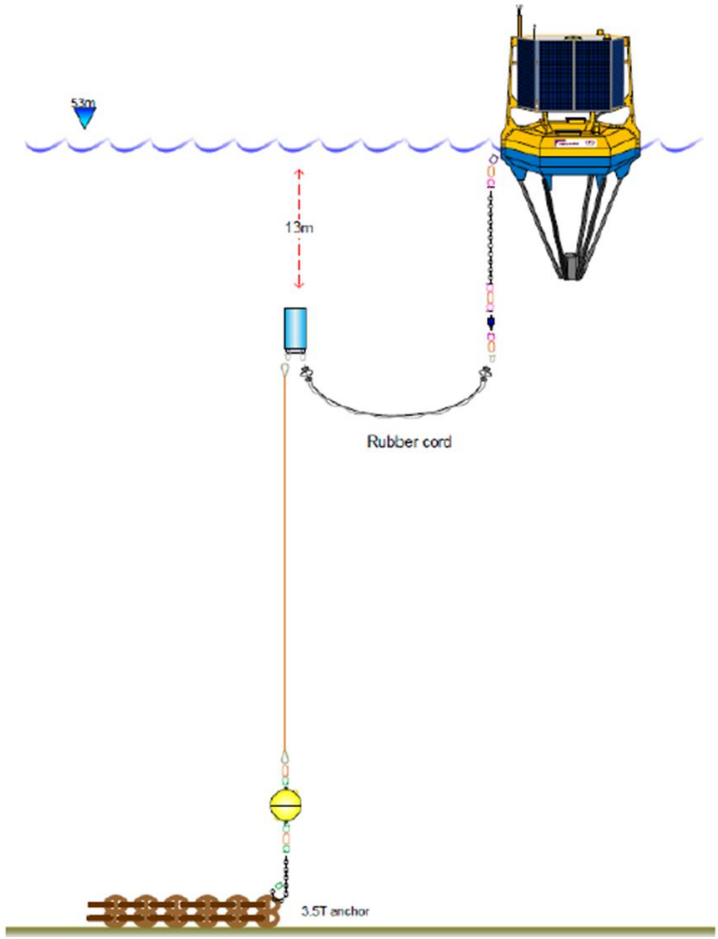

Figure 2-3: Indicative Floating LiDAR Buoy Mooring Design

2.3.2 Wave Buoy

A Datawell Direction Waverider (DWR) MkIII buoy (wave buoy; Figure 2-4 and Table 2-2) will be deployed adjacent to the Floating LiDAR Buoy and will measure wave height, period and direction as well as sea surface temperature to inform engineering design and site assessments.

Figure 2-4: Datawell Direction Waverider Buoy (Datawell 2025)

The wave buoy is 0.9 m in diameter, weighs 216 kg with orange painted hull and a 3nM yellow light-emitting diode (LED) flasher integrated into the antenna with a standard pattern of five flashed every 20 seconds.

Service trips will be conducted every six months for inspection, maintenance and repair of the wave buoy as detailed in Section 4.1.2.

Table 2-2: Datawell Direction Waverider MkIII Buoy Specifications

Specification	Detail
Diameter	0.9 m
Weight	216 kg
Wave buoy system	Datawell Directional Waverider MkIII
Sensor	Datawell stabilised platform sensor measuring heave, pitch direction and roll
Material	Stainless steel AISI316 or Cunifer10
Power systems	Batteries: Datacell RC27B, 3 sections of 15 batteries
Operational life	49 months

Mooring design

Mooring design of the wave buoy will follow similar industry standard practice and manufacturer recommendations for wave buoy mooring (Datawell 2025; Figure 2-5) and is subject to change following further design refinement. The mooring will be constructed and secured to the wave buoy prior to mobilisation to site and deployment.

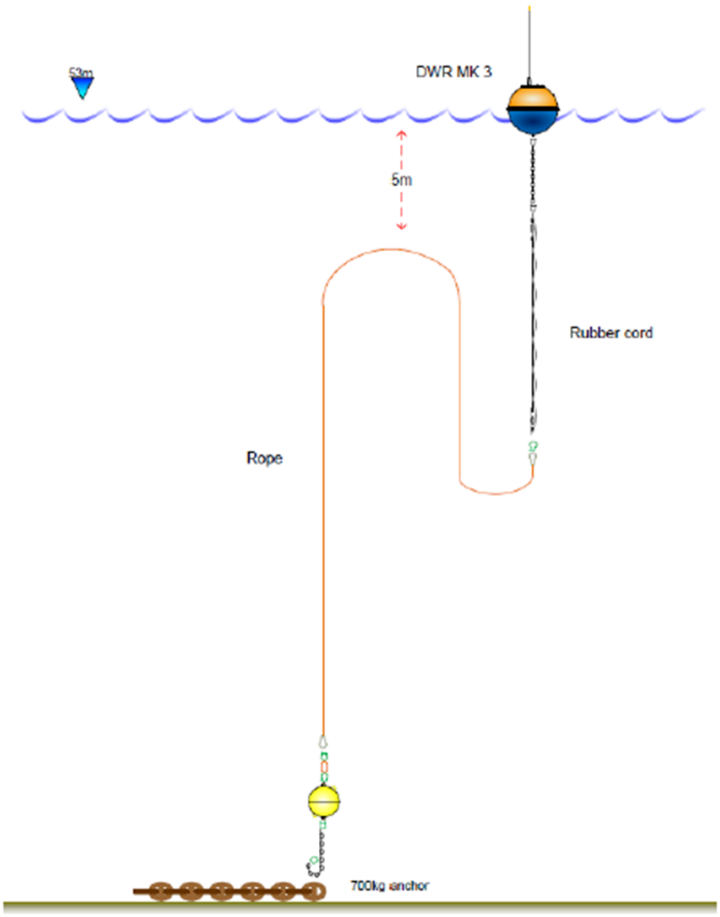

Figure 2-5: Indicative Datawell Direction Waverider Buoy Mooring Design

2.3.3 Seabed Frame

Seabed frames are widely used in offshore industries (wind, oil and gas, and coastal infrastructure) for deploying oceanographic instruments near the seafloor. One such frame will be deployed adjacent to the Floating LiDAR Buoy, moored to the seabed at depths greater than 30 m, with no surface markers.

Frame Specifications:

- Footprint: ~4 m²
- Height: ~0.6 m above seabed
- Purpose: Collect comprehensive oceanographic data for engineering and environmental assessments

Instruments Installed:

- Current profiler
- Temperature & conductivity sensors
- Tide sensor
- Turbidity logger
- Sediment trap/boomer tube: For turbidity calibration
- Chlorophyll sensor

Figure 2-6: Example of a Seabed Frame

Mooring Design

The seabed frame mooring follows standard industry practices, with potential refinements during final design. The mooring system is pre-assembled and secured to the frame before deployment.

Tracking and Positioning:

- Acoustic releases and positioning beacons are used to locate the mooring.
- Satellite beacons are attached to both the anchor weight and frame for additional tracking.
- All acoustic devices are tested before and after deployment to ensure accurate positioning for maritime notifications.

Maintenance and Redundancy:

- The entire frame and mooring system is replaced every 3 months during maintenance.
- New acoustic releases and transponders are deployed each time.
- Reused devices are disassembled and inspected before redeployment.
- Acoustic releases offer a 30-month battery life, ensuring redundancy for the 3-month service intervals.

Figure 2-7: Indicative Seabed Frame Mooring Design

2.4 Deployment Considerations

All equipment will be assembled and tested (including functionality and data transmission) prior to deployment at Port Anthony, subject to vessel availability. The seabed frame and wave buoy will be loaded onto the vessel via port crane, while the Floating LiDAR Buoy will be lowered into the water and towed to site.

Deployment is planned as a single mobilisation, with the vessel traveling overnight and deployment beginning at first light. The deployment sequence will be determined on-site based on weather and sea conditions. Each equipment piece will be deployed by paying out the mooring line while the vessel moves slowly (<1 knot), followed by lowering the anchor/clump weight using a HIAB crane with a quick-release mechanism. GPS coordinates will be recorded for each deployment. The process is expected to take three days, with up to seven days allowed for weather delays. No divers or jack-up barges will be used.

Deployment locations were selected based on seabed conditions, operational constraints, and stakeholder input, ensuring minimal impact on sensitive areas and other activities. All vessels used will be commercial survey-class vessels appropriate for metocean operations.

Vessel type and specifications are dependent on vessel availability and activity, an indicative work vessel for the proposed activities is the Samson Explorer, supplied by Bhagwan Marine. Typical vessel specifications are provided in Table 2-3. The number of vessels conducting operational activities is expected to consist of one at a given time.

Table 2-3: Indicative Work Vessel Specifications (Samson Explorer)

Specification	Detail
Survey	2B
Year	1984
Length	35 m
Beam	13.2 m
Draft	2.5 m
GRT	341T
Hull	Steel - twin keel catamaran
Deck crane	FASSI F1000 ASX
Main engines	2x Cummins KTA 19-M3
Fuel capacity	53 m^3
Stern roller	20T
4 Point mooring	10T
Radar	FURUNO 1932 MK2 48Nm
Propulsion	Twin screw

2.5 Timing

The campaign aims to collect two years of wind and oceanographic data from June 2025 to May 2027. Equipment deployment is expected to take three days, with up to seven days allowed depending on weather, and will occur in a single mobilisation.

Data collection will span 24 to 27 months, including 12-month initial data acquisition, 12-month extension period and up to 3 months for potential recovery overrun.

Scheduling accounts for project requirements, vessel availability, and weather, with buffer time built into deployment, maintenance, and decommissioning plans.

Table 2-4: Timeline of Proposed Wind and Metocean Measurement Campaign Activities

Activity	Indicative Date									
	2025			2026				2027		
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Equipment Deployment	3 (7) days									
Wave Buoy Maintenance			5 (7) days		5 (7) days		5 (7) days		5 (7) days	
Floating LiDAR Buoy Maintenance										
Seabed Frame Maintenance		3 (7) days		3 (7) days		3 (7) days		3 (7) days		
Decommissioning										3 (7) days

Note: Estimated duration of activity is displayed in cells, allowance for weather dependence in days are shown in brackets.

03. Structures, Equipment and Property

3 Structures, Equipment and Property

This section summarises the relevant equipment to be deployed within the License Area (Table 3-1).

Table 3-1: Summary of structures, Equipment and Property that will be deployed within the Licence Area

Item	Description	Deployment Location (GDA94)		Water Depth (approx. m MSL)	Seabed Footprint
		Latitude	Longitude		
Floating LiDAR Buoy					
Buoy	See section 2.3.1 for a detailed description of the Floating LiDAR Buoy.	38° 38.58' S	147° 22.98' E	53	
Anchor	3.5T Static anchor with single tether point				2 x 1 x 0.5 m (high)
Mooring line	Stainless steel chain will be attached to the Floating LiDAR Buoy linking to rubber cords with a Nylon safety tether				
Float	The rubber cord and safety tether will attach to a 50 kg float with 1kg float near anchor to apply tension				
DWR Wave Buoy					
DWR buoy	See section 2.3.2 for a detailed description of the Datawell DWR buoy	38° 38.74' S	147° 22.70' E	53	
Anchor	The polypropylene rope will be secured to a 700 kg anchor with a float to apply constant tension.				1.5 x0.8 x 0.5 m (high)
Mooring line	Stainless steel chain will be attached to the wave buoy linking to rubber cored with a Nylon safety tether.				
Mooring rope	The rubber cord and safety tether will attach to a polypropylene rope				
Acoustic release	An acoustic release will be attached to a spooler with Dyneema rope to allow recovery of the anchor weight.				
Seabed Frame					
Frame	See section 2.3.3 for a detailed description of the seabed frame	38° 38.42' S	147° 23.26' E	53	2 x 1 x 0.6 m (high)
Clump weight	500kg static clump weight with single attachment point				1.5 x 0.5 x 0.5 m (high)
Ground wire	A ground wire will secure with Bow-shackles to the clump weight				
Acoustic release	Acoustic release with Dyneema rope for recovery of seabed frame				

04. Maintenance of Structures, Equipment and Property

4 Maintenance of Structures, Equipment and Property

In accordance with Regulation 88 of the OEI Regulations, all structures, equipment and property relevant to the Wind and Metocean Measurements Campaign proposed activities will be kept in good condition and repair.

4.1 Wind and Metocean Measurements Campaign Activities

4.1.1 Integrity of Equipment

Floating LiDAR Buoy

The Floating LiDAR Buoy is an advanced, industry-certified system featuring the ZX 300M LiDAR sensor, proven for precise wind speed and direction measurement. It delivers reliable, high-quality data under diverse offshore conditions, rivaling traditional met masts. Designed for extreme marine environments, the buoy includes environmentally conscious mooring to reduce entanglement risks. It holds Stage 3 Carbon Trust certification, confirming its commercial-grade reliability and accuracy.

The buoy is fully powered by renewable energy (wind and solar), with a robust charge-to-discharge ratio >2 and can operate autonomously for 12 days. It also includes redundant communication systems (satellite, Wi-Fi, 4G) and an independent tracking beacon for added reliability.

Wave Buoy

The Datawell Directional Waverider MkIII is a robust wave buoy designed for offshore conditions, constructed from AISI 316 stainless steel or cunifer 10 for corrosion resistance. It operates on three RC27B battery sections, offering up to 49 months of continuous operation via an intelligent sequential discharge system.

Key features include:

- Operational temperature range: -5°C to +35°C
- Corrosion-resistant mooring components, with some exceptions (e.g., aluminium sinker, steel shackles)
- Force tolerance: Up to 100 kg under normal conditions
- Anti-foul paint to reduce biofouling
- Safety tether for emergency retention if the rubber cord fails

Seabed Frame

The seabed frame, made of aluminium, is a standard platform for mounting oceanographic instruments. Equipment is attached based on optimal positioning for data accuracy. Weighing over 150 kg, it includes 100 kg of ballast in its corners to minimize movement from underwater forces. The frame is secured to a 500 kg clump weight via steel cable, restricting its movement to the cable's length.

4.1.2 Inspection, Maintenance and Repair of Equipment

A variety of inspection, maintenance and repair activities may be undertaken throughout the Wind and Metocean Measurements Campaign activity lifecycle, as outlined in Table 4-1.

Table 4-1: Inspection, Maintenance and Repair Activities

Activity	Indicative Frequency	Approximate Planned Duration (days)
Seabed frame maintenance and inspection	3-monthly	3-7
Wave buoy maintenance and inspection	6-monthly	3-7
RPS Floating LiDAR 3.5 Buoy maintenance and inspection	6-monthly	3-7

4.1.3 Testing and Monitoring

The Floating LiDAR Buoy and wave buoy are remotely monitored to detect mooring failures. They transmit satellite coordinates every 10 and 30 minutes, respectively. These positions are assessed against predefined thresholds, and if exceeded, an alert triggers emergency recovery and redeployment procedures.

The seabed frame is equipped with two subsurface PTT satellite beacons—one on the frame and one on the anchor clump weight—to enable tracking if unintentionally removed. Activation of a PTT beacon sends SMS and email notifications.

05.

Decommissioning and Removal of Structures, Equipment and Property, and Remediation

5 Decommissioning and Removal of Structures, Equipment and Property, and Remediation

In accordance with Regulation 89 and 90 of the OEI Regulations, all Licence infrastructure will be decommissioned, dismantled and removed from the Licence Area.

5.1 Decommissioning

Each deployed metocean equipment piece has been designed to enable the complete removal of the mooring and buoy from the Licence Area. Decommissioning of equipment includes:

- Floating LiDAR Buoy
    - Recovery and decommission of the Floating LiDAR Buoy and mooring will involve recovery of the mooring on to the vessel and towing of the buoy to port.
- Wave Buoy
    - Recovery and decommission of the wave buoy and mooring will follow similar recovery methods as outlined in Section 26.3 of the product user manual (Datawell, 2025).
- Seabed Frame
    - Recovery of the seabed frame will follow similar steps outlined for wave buoy recovery and decommission.

5.2 Remediation

No remediation is expected to be required. Impacts to the seabed from metocean equipment and moorings are localised, minimal and restricted to the footprint of the equipment piece.

06. Stakeholder Engagement Strategy

6 Stakeholder Engagement Strategy

A Stakeholder Engagement Strategy (SES) has been developed for the Aurora Green OWF Project and it has been applied for consultation and engagement in relation to the to the activities under the Management Plan.

The SES (available at Iberdrola Australia | Offshore Wind | Aurora Green | SES) sets out how Iberdrola Australia will continue to engage over the life of the Management Plan and the Project.

The SES includes:

- The process used to identify stakeholders.
- A list of stakeholders consulted, and information provided.
- A report on the responses and outcomes of consultation undertaken.
- Avenue for ongoing consultation throughout the life of the Project.

6.1 Legislative Consultation Requirements

The OEI Regulations (82) requires Iberdrola Australia, as the Licence Holder, to describe an SES with processes for:

- Identifying stakeholders
- Any claims raised
- An assessment of merits for each claim
- Any measures to address each claim and the effectiveness of those measures
- The process for ongoing engagement and complaints management
- Updates to the SES and ensuring it is kept current.

6.2 Stakeholder Engagement and Consultation Process

6.2.1 Process of Identification of Persons, Organisations, Communities and Groups

Iberdrola Australia has followed the requirements of Regulation 64 and 82 of the OEI Regulations to identify persons, organisations, communities and groups that are relevant to the Licence activities in the course of preparing the Management Plan. In accordance with Regulation 81(2), the Management Plan outlines the process used to identify and consult with persons, organisations, communities and groups (stakeholders) for the Licence activities.

6.2.2 Provision of Sufficient Information and Reasonable Effort

In accordance with Regulations 64 and 65, Iberdrola Australia has provided reasonable effort and sufficient information to allow an informed assessment of any potential impacts that the activities may have on the functions, interests, rights and activities of stakeholders.

Specifically, for the activities associated with the Management Plan, stakeholder engagement included:

- consultation emails, including a factsheet
- follow up phone calls
- face-to-face meetings
- briefings.

6.2.3 Reasonable Period for Consultation

Iberdrola Australia has allowed a reasonable period for each stakeholder, to participate in consultation for the activity associated with the Management Plan. Iberdrola Australia has been engaging and consulting with stakeholders since early preparation of the Feasibility Licence application, the consultation period for the activity commenced in August 2024 and continues through the life of the Management Plan (Section 6.2.5.)

6.2.4 Assessment of Merit Process

In accordance with Regulation 81 (2) (c) and 81 (3), a report on the outcomes of the consultation including a summary of claims, an assessment of merit for each claim and any measures to be implemented in response to the claim is provided in Appendix A.

Iberdrola Australia considers all feedback during consultation from persons, organisations, communities and groups contacted.

6.2.5 Ongoing and Future Consultation and Stakeholder Engagement

Consultation will continue during the life of the Management Plan. As required by Regulation 82(4) of the OEI Regulations, the overarching SES is available on Iberdrola Australia 's website.

The SES will be kept up to date and remain on the website until the Licence ceases to be in force.

The SES provides avenues for stakeholders to provide feedback to Iberdrola Australia during the life of the Management Plan and the Project.

Should consultation feedback be received following the acceptance of a Management Plan that identifies a measure or control that requires implementation or updates to meet the intended outcome of consultation, Iberdrola Australia will apply its Management of Change and Review process (see Section 10.8). Should there be changes to the Management Plan, or activities planned, the list of stakeholders and their categories will be reviewed. Where changes are required, the corresponding notification and engagement will be undertaken for that stakeholder.

A Stakeholder Engagement Register is maintained to ensure ongoing feedback from stakeholders is recorded and assessed for merit as appropriate.

6.2.6 Enquiry channels

Feedback from community members, stakeholders, and the public can be submitted through the Iberdrola Australia website, which is regularly reviewed by the Project team during business hours. Alternatively, you may contact the project engagement team directly via email at offshorewind@iberdrola.com.au or by phone at (+61) 1800 917 372.

07. Consultation and Engagement Carried Out

7 Consultation and Engagement Carried Out

7.1 Summary of Consultation and Engagement Conducted

The first phase of engagement on the Project was focused on engagement with government, Traditional Owners, regulators, supply chain, community and key stakeholders for the broader Aurora Green OWF Project.

The second phase of engagement was to assess the list of stakeholders for the broader Aurora Green OWF Project and determine which are relevant based on the activities described in the Feasibility Licence Management Plan. Iberdrola Australia undertook an assessment of relevance of stakeholders identified from the stakeholder categories described in Regulation 82(1), those deemed as relevant to the activities under the Management Plan were consulted, as listed in Table 7-1. A broader list of stakeholders has been collated in the SES.

Table 7-1: Stakeholders identified for consultation in relation to activities under the Management Plan

Stakeholder category	Stakeholders identified (relevant to this management plan)
Offshore Electricity Infrastructure (Declared Area OEI 01 2022) Declaration 2022 Conditions	
Condition 1	Department of Defence
Condition 2	• the Bureau of Meteorology • the Director of National Parks • the Australian Maritime Safety Authority (AMSA) • 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
Condition 3	Commercial fisher rights holders in accordance with Licence conditions, specifically: i) fishing concession or permit holder that has nominated a representative organisation for the purpose of consultation ii) fishing concession holder under the Fisheries Management Act 1991 or permit holder under the Fisheries Act 1995 (Vic)
OEI Regulation 64	
a) Department of State, agency or authority of the Commonwealth, a State or a Territory that has functions that relate to the activities subject to consultation	• Department of Defence • Bureau of Meteorology • Australian Maritime Safety Authority (AMSA)
b) Aboriginal or Torres Strait Islander people or groups that the Licence Holder reasonably considers may have native title rights and interests in relation to (i) the Licence Area; or (ii) areas of land or water that are adjacent to the Licence Area	Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)
c) Aboriginal or Torres Strait Islander organisations established under a law of the Commonwealth, a State or a Territory with functions related to	

Stakeholder category	Stakeholders identified (relevant to this management plan)
managing for the benefit of Aboriginal or Torres Strait Islander people (i) land or water in or (ii) adjacent to the Licence Area	
d) Aboriginal or Torres Strait Islander organisations or groups that are 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 rights relate to (i) land or water in or (ii) adjacent to the Licence Area	
e) the holder of any other Licence granted under the Act	The 12 Gippsland Offshore Wind Licence Holders, the most relevant being neighbouring Licence Holders JERA Nex and Corio Generation
f) people or organisations that may carry out activities in or near the Licence Area for a commercial purpose, under a Licence or permit issued under law	• Tasmanian Gas Pipeline • Victorian State Government's CarbonNet Project (for the purpose of greenhouse gas title G-5-AP held by the Crown in right of Victoria) • Esso / ExxonMobil • 3D Energi • South East Trawl Fishing Industry Association (SETFIA) • Southern Shark Industry Alliance (SSIA) • Seafood Industry Victoria (SIV) • Lakes Entrance Fishermen Cooperative Limited (LEFCOL)
g) communities (ii) that the Licence Holder reasonably considers may be directly affected by the Licence activities	Local communities engaged through open sessions at: Seaspray, Traralgon, Foster, Yarram, Port Albert, Golden Beach and Sale
h) any organisation representing recreational fishers whose activities the Licence Holder reasonably considers may be directly affected by the Licence activities.	• Victorian Recreational Fishing Peak Body (VR Fish) • Gippsland Angling Clubs Association • Gippsland Lakes Fishing Club Inc • Lakes Entrance Game and Sport Fishing Club Inc • Loch Sport Angling Club • Loch Sport Community House Fishing Group • Loch Sport Fishing Association • McLoughlins Beach Angling Club • Port Albert Light Game & SF Club Inc • Sale Angling and Sportsfishing Club Inc

7.1.1 Additional Identification of Relevant Persons, Groups and Organisations

During the life of the Management Plan, additional persons, organisations, communities and groups may be identified. To allow for a broad capture of relevant persons, organisations, communities and groups, information about the activity is publicly available via the Publication of our SES.

7.2 Outcome of Stakeholder Engagement Conducted

Appendix A outlines the results of Iberdrola Australia's consultation and engagement activities specific to the activity described in this Management Plan Summary.

All feedback and correspondence received is entered into the Stakeholder Engagement Register.

08. Compliance with License Conditions

8 Compliance with Licence Conditions

The conditions relevant to the License activities conducted within the Wind and Metocean Measurement Campaign are described in Table 8-1, including how Iberdrola Australia will comply with these conditions.

Table 8-1: Licence Conditions and Obligations

Number	Condition/Obligation	Type	Management Action
Licence Conditions			
1	*The Licence Holder is to assess the feasibility of the proposed commercial offshore infrastructure project described in the table above* (Referring to Table 1-1 of this document)	Licence	Iberdrola Australia will assess the feasibility of the project as defined in Table 1-1
2	*The Licence Holder must comply with any requirements to pay an amount of offshore electricity infrastructure levy*	Licence	Iberdrola Australia will comply with all levies related to the Feasibility Licence
3	*The Licence is subject to the conditions specified in Section 6 of the Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022 (as at 12/07/2024)*	Licence	Refer to Item Number 7-9
4	*The following people must comply with the Management Plan for the Licence, if there is one:* *i. The Licence Holder* *ii. Any other person carrying out activities under the OEI Act or the Licence on behalf of the Licence holder*	Licence	Iberdrola Australia and all persons carrying out activities under the Licence will comply with this Management Plan
5	*The Licence Holder must give reports to the Registrar or Minister in accordance with Section 33 of the Offshore Electricity Infrastructure Regulations 2022*	Licence	In accordance with Section 33 of the OIR Regulations, Iberdrola Australia will provide the Registrar an Australian supply chain and workforce analysis report before the end of 2 years after the day the Licence came into force Iberdrola Australia understand the report is subject to review and update as directed by the Registrar If the Registrar gives Iberdrola Australia a notice under subparagraph (5)(b)(i), Iberdrola Australia will: – publish the report on the Licence Holder's website within 30 days after receiving the notice; and

Number	Condition/Obligation	Type	Management Action
			– keep the report on the Licence Holder's website for as long as the Feasibility Licence remains in force Before publishing the report, Iberdrola Australia will ensure the published reports meets the requirement as stipulated in Section 33A(7) If a Feasibility Licence is in effect when Section 33A(8) commences, Iberdrola Australia will give the Registrar the first report under Section 33A(8) in relation to the Licence before the end of 2 years after the day the Licence commences, instead of before the time mentioned in subsection (1)
6	*The Licence is subject to any conditions prescribed by the licensing scheme*	Licence	Noted. Iberdrola Australia will comply with all project Licence conditions
Offshore Electricity Infrastructure (Declared Area OEI-01-2022) Declaration 2022 Conditions			
7	*The Licence Holder must:* *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 in the Management Plan for the Licence, address the outcomes of this consultation.*	Legislation	Refer to Section 0 for details of consultation with the Department of Defence in relation to the activities covered by this Management Plan
8	*The Licence Holder must:* *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* *in the Management Plan for the Licence, address the outcomes of this consultation.*	Legislation	Refer to Section 0 for details of consultation undertaken with each of the relevant stakeholders listed in this condition in relation to the activities covered by this Management Plan

Number	Condition/Obligation	Type	Management Action
9	*The Licence Holder must:* *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* *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.*	Legislation	Refer to Section 0 for details of consultation undertaken with the relevant stakeholders listed in this condition in relation to the activities covered by this Plan Management.

09.

Environmental Management Obligations under the EPBC Act

9 Environmental Management Obligations under the EPBC Act

The *Aurora Green Offshore Wind Farm Preliminary Surveys* was referred under the EPBC Act in September 2024, for the purpose of undertaking preliminary geophysical, geotechnical, metocean and benthic marine surveys to inform the wider project (EPBC Act referral 2024/09968).

On 11 December 2024, the activity was deemed a “not controlled action if taken in a particular manner” (EPBC reference: 2024/09968).

The Notification of Referral Decision issued by DCCEEW on 11 December 2024, outlines Iberdrola Australia’s obligations under the EPBC Act when undertaking preliminary geophysical, geotechnical, metocean and benthic marine surveys. Table 9-1 describes Iberdrola Australia’s obligations under this Notification of Referral Decision for referral 2024/09968.

Table 9-1: EPBC Act Environmental Obligations and Measures for Implementation of Relevance to the Scope of this Plan

Number*	Condition/Obligation	Measures for Implementation
Licence Area Boundary		
1	The person taking the Action must not take the Action outside the project area	▪ Contractors or organisation undertaking activities on the Licence Holder's behalf shall agree to and work within the bounds of the Licence Area ▪ The Licence Area coordinates will be supplied (in the preferred format) to all contractors or organisation undertaking activities on the Licence Holder's behalf prior` to any activities commencing
Cetacean Interaction Minimisation		
2	The person taking the Action must ensure that no survey vessel travels at a speed greater than 6 knots if a cetacean has been observed in the Shut-down Zone within any of the previous 30 minutes unless all sighted cetaceans have been observed to leave the Shut-down Zone.	▪ Measures to minimise and mitigate the impact of potential interactions between marine species or the marine environment with vessels and survey equipment, including (and not limited to): maintenance of vessels and equipment, constant slow vessel speed (as per required by this condition when applicable) and turning off equipment when not in use to reduce unnecessary noise. ▪ Prohibitions under the EPBC Regulations, Statutory Rules No. 181, 2000, under the EPBC Act – Part 8 – Interacting with cetaceans and whale watching Federal Register of Legislation will be followed by survey vessels including approach distances.
Training, Recording and Precautionary Measures		
5	The person taking the Action must ensure all crew onboard the survey vessels are trained crew.	▪ Contractors or organisation undertaking activities on the Licence Holder's behalf shall agree to and work within the bounds of the minimum contractor requirements defined by Iberdrola which includes the provision of suitable training and certification prior to acceptance.
Invasive Marine Species		
16	The person taking the Action must ensure that it does not, in taking of the Action, introduce or spread invasive marine species to areas of the Commonwealth marine environment where they were not previously present.	▪ All project vessels will abide by the ballast water exchange guidelines defined in the Australian Ballast Water Management requirements (DAWE, 2020), with no discharge of ballast water within 12 nautical miles of land ▪ All project vessels will adhere to the requirements of the National Biofouling Management Guidance (Commonwealth of Australia, 2009) regarding the management biofouling risks ▪ Vessel(s) from international waters will submit a Quarantine Pre-Arrival Report (QPAR) form to the Department between 12 and 96 hours prior to arriving and ballast water management summary logs will be confirmed by the Department prior to entry ▪ All project vessels will ensure maintenance of ballast water system in accordance with manufacturer's specifications ▪ All project vessels will ensure anti-fouling system certification is in place in accordance with AMSA Marine Order Part 98 (Anti-fouling systems) ▪ All project vessels will ensure routine cleaning and inspection of submersible equipment, consistent with the requirements of the National Biofouling Management Guidance ▪ Internationally sourced Project vessels will manage their biosecurity risk associated with biofouling as specified in the Australian Biofouling Management Requirements.

*Condition/Obligation number is relative to the EPBC Notification of Referral Decision letter

10. Management System

10 Management System

Iberdrola Australia's management system ensures compliance of all activities covered in the Management Plan with all relevant obligations, include:

- the OEI Act, the OEI Regulations or any other instrument made under the OEI Act
- the conditions of the relevant Licence (refer to Section 8)
- the EPBC Act or any regulations under that Act (refer to Section 9)
- the applied work health and safety provisions (refer to Section 11)
- the Management Plan for the relevant Licence (this document).

Iberdrola Australia operates under a comprehensive Business Management System (BMS), which includes its Work Health and Safety Management System (WHSMS) and Environmental Management System (EMS). These systems define the policies, standards, and procedures required across all projects.

The WHSMS ensures the health and safety of workers and others affected by operations, providing a structured approach to managing WHS risks and achieving the objectives of the WHS Policy. The project-specific Environmental Management Plan (EMP) outlines environmental risks, controls, and responsibilities. It demonstrates compliance with Iberdrola's policies, legal obligations, and environmental targets.

10.1 Roles and Responsibilities

All Iberdrola Australia managers, supervisors, workers, contractors and subcontractors have a role to play in the implementation of the BMS.

Iberdrola Australia has established a comprehensive and clearly defined chain of command for all Licence activities, supported by an organised project management framework. The key roles and responsibilities for the current activity are shown in Figure 10-1. Responsibilities are communicated and clarified via various initiatives (e.g. positions descriptions, induction, training, etc., as further described in Section 10.5).

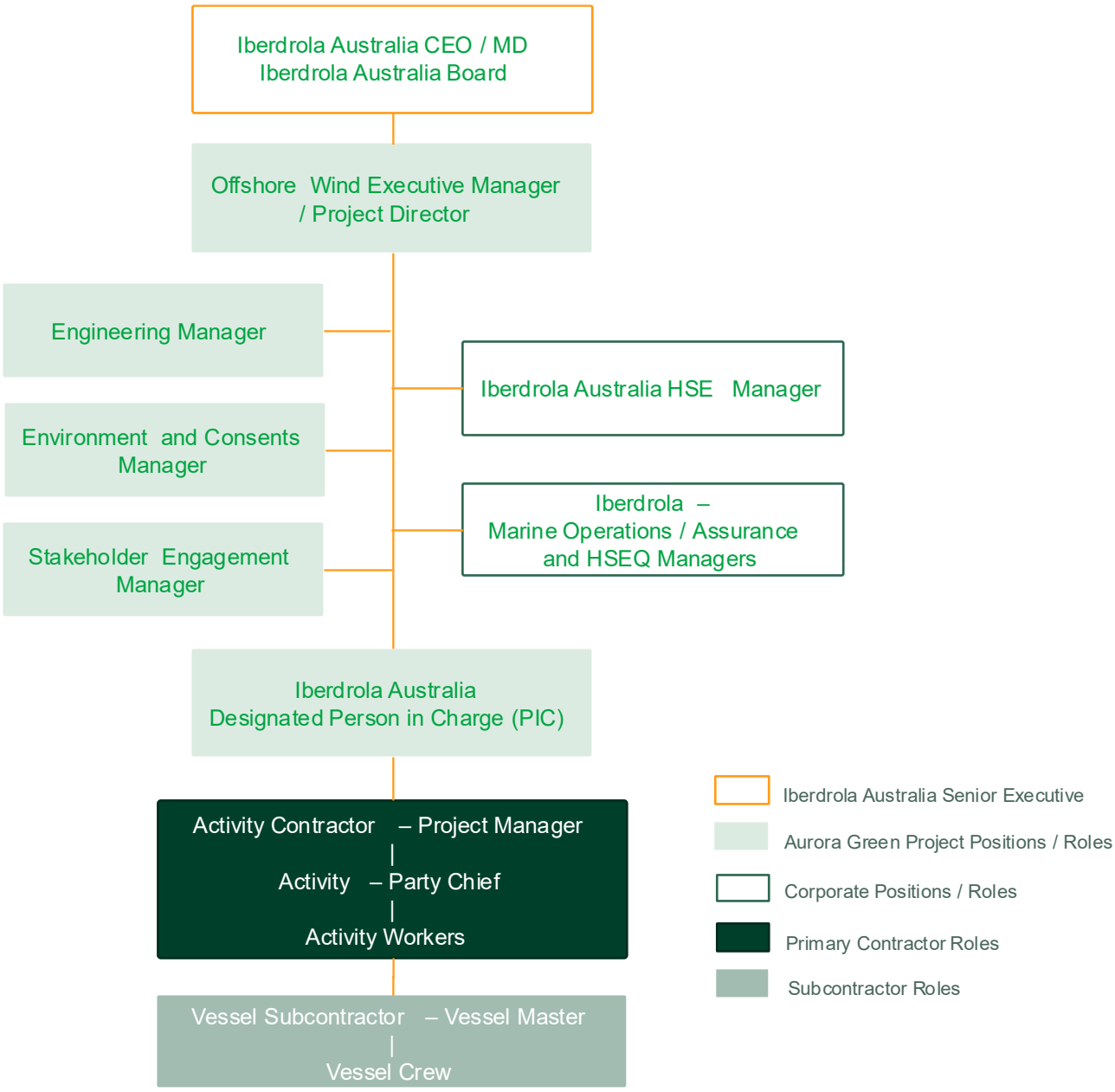

Figure 10-1 Key Roles and Responsibilities for the Licence Activity (Wind and Metocean Measurements Campaign)

10.2 Risk Management

10.2.1 Risk Management Framework

The purpose of Iberdrola Australia's Risk Management Framework is to facilitate the achievement of Iberdrola's business and HSE objectives, by eliminating risks so far as is reasonably practicable, and ensuring appropriate controls and responses to minimise potential risks. The Risk Management Framework is designed to integrate risk management into all of the functions, levels and activities of the entire organisation.

The Risk Management Framework design has been based on the Iberdrola "three lines" model of risk management. The priority of the risk management framework is to eliminate risk, or where elimination is not reasonably practicable, minimise/reduce the risk So Far As Is Reasonably Practicable (SFAIRP).

10.2.2 Risk Assessment Process

The risk assessment process (Figure 10-2) involves "the systematic application of policies, procedures and practices to the activities of communicating and consulting, establishing the context and assessing, treating, monitoring, reviewing, recording and reporting risk", as per the Australian Standard AS ISO 31000:2018 Risk Management – Guidelines.

To facilitate the risk assessment process, Iberdrola Australia has developed risk management framework, standard and procedure documents which outline the processes and contain criteria for the consequence and likelihood of risks, as well as the risk matrix, to be applied when conducting risk assessments.

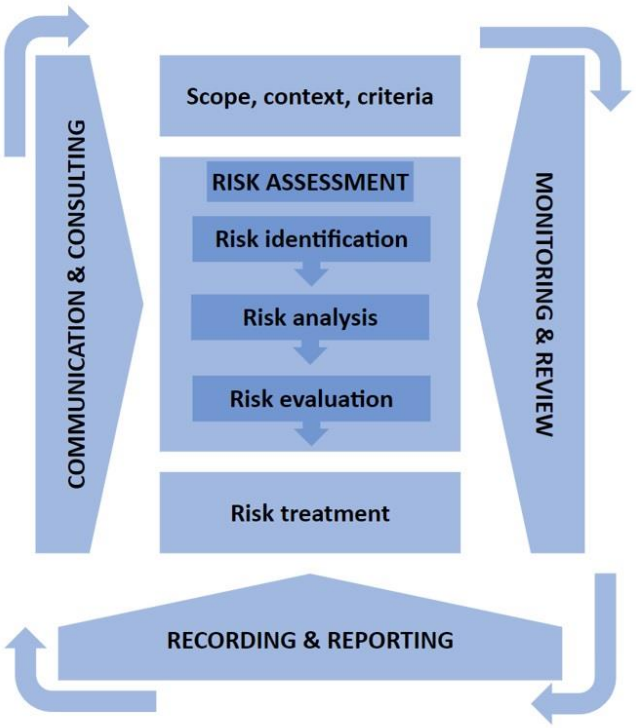

Figure 10-2: Risk Assessment Process (AS ISO 31000:2018, Fig 4))

10.2.3 Risk Identification

Hazards, impacts and risks are identified during the scoping phase of an activity and are identified for both planned (routine and non-routine) activities and unplanned (accidents/incidents/emergency conditions) events. Hazard identification may be conducted through a variety of methodologies and workshops, such as but not limited to:

- Hazard Identification Study (HAZIDS)
- Hazard and Operability Study (HAZOPS)
- Failure Mode, Effects (and Criticality) Analysis (FME(C)A)

10.2.4 Risk Analysis and Evaluation

Iberdrola Australia's Aurora Green OWF project's risk analysis and evaluation process, involves:

- Identifying risks to the activity/project/business, including hot topics, emerging risks and/or those that become evident through activities/operations/incidents.
- Identifying who or what will be exposed to each hazard, risk or impact.
- Assessing the consequence of a risk using the consequence categories outlined in the relevant procedure/standard.
- Assessing the likelihood of the risk occurring using the likelihood/probability of occurrence scale outlined in the relevant procedure/standard.
- Calculating the initial/inherit risk rating.
- Implementing risk treatment by putting controls and mitigation measures in place.
- Deriving the residual risk rating by assessing the residual consequences and likelihood of occurrence after implementation all controls.

10.2.5 Risk Treatment

Where risks are identified, control measures will be implemented according to the hierarchy of controls consistent with Regulation 36 of the WHS Act 2011, and as required by the applied work health and safety provisions:

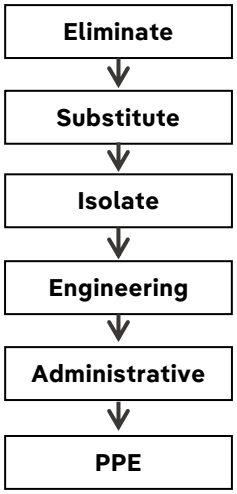

Figure 10-3: Hierarchy of Controls (consistent with WHS Regulation 36)

The risk assessment and treatment process will be documented to demonstrate that risk elimination and minimisation has taken place, SFAIRP.

10.2.6 Risk Management Outcomes

The outputs of the risk management process as defined in above, will be utilised to identify, assess, and prioritize hazards, impacts, and risks associated with Licence activities. By systematically analysing the outputs, targeted control measures can be adopted that are aimed at mitigating identified risks and reducing their potential impact. These control measures may include implementing engineering solutions, updating operational procedures, and providing refinements to the contractor management policy.

An ongoing cycle of evaluation and adjustment will enable the proactive management of risks and ensure continuous compliance with relevant obligations.

10.3 Activity – Risk Assessment

An activity-specific Risk Assessment Method Statement (RAMS) and activity Project Risk Register (PRR) has been completed for the activities described in Section 0 by Iberdrola Australia and its activity contractor.

10.4 Compliance with Relevant Obligations

The management system implemented for the Licence Activity, underpinned by Iberdrola's relevant policies, standards and procedures, will ensure compliance with relevant obligations under:

- the OEI Act, the OEI Regulations or any other instrument made under the OEI Act
- the EPBC Act or any regulations under that Act
- the applied work health and safety provisions
- the conditions of the relevant Licence
- the obligations of the EPBC referral
- the Management Plan for the relevant Licence.

10.5 Training and Competency

As a minimum, awareness training is required for all personnel. Inductions are provided to all relevant personnel (e.g. contractors and Iberdrola Australia representatives) before mobilising to or on arrival at the activity location. The induction covers the HSE requirements and environmental information specific to the activity location. Attendance records will be maintained.

The induction may include, but is not limited to:

- Description of the activity
- Ecological and socio-economic values of the activity location
- Regulations relevant to the activity
- Management Plan structure/implementation/roles and responsibilities
- Main environmental aspects/hazards and potential environmental impacts
- Emergency preparedness
- Incident reporting.

10.6 Contractor Management

Iberdrola Australia evaluates a contractor's management systems as part of its contracting and pre-mobilisation process to ensure alignment with relevant standards. This assessment verifies whether the contractor has a clearly defined organisational structure outlining key roles and responsibilities. It also checks for an up-to-date training matrix that specifies both corporate and site-specific environmental training and competency requirements.

Contractors, subcontractors and third parties working on Licence activities must meet defined management and procurement standards and minimum HSE requirements for any contracted works on Licence activities.

10.7 Vessel and Marine Assurance

Iberdrola implements a Vessel Assurance and a Marine Assurance process based on industry standards and is managed by Marine Operations / Assurance business support function.

The Vessel Assurance is an internal process to ensure that a vessel, crew and/or its equipment meet contractual and operation-specific requirements. The objective is to determine that the subject vessel, is fit for purpose for the activity. Vessel inspections are used to verify actual levels of compliance with Iberdrola's Safety Management System.

The Marine Assurance Process is a more in-depth assessment. Contractors are assessed and audited according to Iberdrola vessel and HSE requirements. The process is mandatory for all vessels ensuring that vessel are seaworthy, meet the requirements for a defined scope and are managed with a robust safety management system.

10.8 Management of Change

Management of change (MoC) will follow the Iberdrola MoC procedure which ensures that all potential changes are systematically identified, assessed, and appropriately managed to minimise operational disruptions and maintain compliance with Licence and regulatory requirements.

10.9 Communication and Cooperation

Effective communication and cooperation are essential throughout the risk management process to support informed decision-making. Iberdrola ensures this through structured communication practices, including pre-mobilisation kick-off meetings to align all parties on tasks, risks, and HSE standards. Regular meetings with contractors maintain compliance and open dialogue, with Iberdrola's Australia's Person in Charge (PIC) and/or delegate serving as the primary communication point for project related activities.

In-field communication will follow the relevant Iberdrola HSE standard. Each vessel shall have communication with onshore, offshore and ship to shore and have suitable equipment for vessel and people tracking.

10.10 Ongoing Processes

10.10.1 Monitoring, Auditing and Recording Compliance

Iberdrola Australia and its contractors will conduct periodic monitoring using tools and systems outlined in the Management Plan to ensure compliance with regulatory requirements. These systems collect evidence as per OEI Regulation 142 and support internal and external reporting, auditing, and assurance. Throughout the Licence activities, Iberdrola Australia will continue to identify any new source-based risks and impact.

Environmental and WHS audits will be conducted periodically, with findings used to support continuous improvement. Non-compliances will be reported and tracked, and all records will be maintained in accordance with OEI Regulation 142.

10.10.2 Identifying and Managing Non-Compliance

Contractors and any organisation working on Licence activities are required to report all environmental and WHS incidents to the Iberdrola Australia designated PIC or delegate. Incident management and reporting is managed as per relevant Incident Reporting Procedure, and Incident Management and Investigation Procedures. Further detail on notifications is provided in Section 14.

10.10.3 Improvement

Identified continuous improvement opportunities will be assessed to ensure any potential changes to this Management Plan are managed in accordance with the OEI Regulations.

11.
Work Health and Safety

11 Work Health and Safety

The OEI Act framework aligns with the Work Health and Safety (WHS) legislation and regulations, adapted to apply in the offshore environment. Iberdrola Australia's Health and Safety Policies outline the health and safety (H&S) management commitments and principles. They are in line with ISO 45001 and share the objectives of the OEI Act framework.

11.1 Relevant Obligations

The License activities described in this Management Plan are regulated offshore activities under Section 226 of the OEI Act and are covered by the applied WHS provisions. Iberdrola Australia as the Licence holder has a duty to ensure that the Licence activities are managed safely, obligations under the applied WHS provisions are met and ultimately ensure safety of all Persons Conducting a Business or Undertaking (PCBUs) and workers.

WHS obligations follow those outlined in the OEI Act framework in relation to the applied WHS provisions.

11.2 Roles and Responsibilities

Roles and responsibilities for WHS related components are in line with those outlined for the overarching management system as described Figure 10-1.

The interface between Iberdrola Australia and PCBUs is documented in the specific Project Execution Plan (PEP) that further outlines the roles and responsibilities of contractor's personnel including WHS related aspects.

11.3 Compliance with Relevant Obligations

Consideration of health and safety issues from project conception through to operation and decommissioning is a key principle adopted by Iberdrola Australia. It is recognised that the nature and extent of health and safety issues and associated risks will vary depending on the scope of work and location of the contractor. Iberdrola Australia has a number of policies, standards and process in place that jointly aim to achieve HSE excellence, as well as to ensure that projects are managed safely, with obligations under the applied WHS provisions being met.

Vessels that are operating in support of Licence activities are regulated under international and domestic maritime requirements. Health & safety management controls are in place by vessel operators to demonstrate management of health & safety and compliance with relevant safety of life at sea (SOLAS) requirements and local applicable legislation.

11.3.1 Work Health and Safety Management System

Iberdrola Australia's Work Health and Safety Management System (WHSMS) ensures that the relevant WHS obligations described in Section 11.1 are met (including how these obligations will be continually met) in relation to the Licence activities as described throughout this Management Plan summary.

Iberdrola Australia's WHSMS involves a set of policies, standards, procedures and plans that systematically manage health and safety at work to eliminate and minimise the potential hazards and risks to the workforce's health and safety, SFAIRP (refer to Section 0 for further details).

Further, Iberdrola Australia's WHSMS has been established to meet the organisation's duties and responsibilities under the applied WHS provisions.

11.3.2 Activity – Health and Safety Risk Assessment

A Health and Safety risk assessment has been undertaken for the activities covered under the Management Plan. Risks associated with activity specific components of the Wind and Metocean Measurement Campaign have been identified and assessed based on activity type and task in the form of a Risk Assessment Method Statement (RAMS) and Job Hazard Analyses (JHA). Adequate controls measures are implemented for each hazard to eliminate and minimise risk, SFAIRP.

11.3.3 Contractor Management

A number of measures will be implemented by Iberdrola Australia to ensure health and safety performance and compliance with the applied WHS provisions. Iberdrola Australia's contractor selection process comprises the following steps:

- Evaluation of tender: evaluate and rank the tenderers against the award criteria
- contractor classifications depending on level of HSE MS interaction
- HSEQ pre-qualification: to identify compliance to facility legal requirements
- Contract HSE section: contain Iberdrola Australia's HSE requirements.

Prior to entering into any service contract, Iberdrola Australia initially reviews the policy(s) and management system of the potential contractor to ensure that:

- They operate to HSE standards acceptable to Iberdrola Australia.
- They implement a comprehensive system of managing their HSE performance during operations.
- They have performed similar work recently and can demonstrate appropriate HSE performance standards.
- They are aware of, have access to, the commitments and obligation requirements of the applied WHS provisions.

Contractors are required to provide documentary evidence of their employees' qualifications, training, experience and fitness. This includes documentation proving that their employees, working at Iberdrola Australia sites, are sufficiently and appropriately trained considering the work they perform including site specific conditions. Training shall be complemented with appropriate information, instruction and supervision to undertake work scope operations.

11.4 Notification of Incidents and Events

WHS notifications will follow that described in Part 3 – Incident notification of the WHS Act 2011. WHS incidents and events requiring reporting to the OIR are outlined in Section 35 of the WHS Act and summarised in Section 6 of the OIR Notification and Reporting of Incidents, Events and Occurrences Guideline.

Further information on notifications in relation to emergency response is provided in Section 12.5. Notifications processes more broadly are described in Section 14.

11.5 Communication and Cooperation

Communication and cooperation will follow that outlined in Section 10.9. In addition, all PCBUs, contractors or organisation conducting works on Licence activities will comply with relevant OEI Act and WHS provisions for consultation, communication and cooperation.

Consultation with all relevant personnel and organisation will follow that outlined in Section 10.2 of the OIR Work Health and Safety under the OEI Act Framework guideline.

12.
Emergency Management

12 Emergency Management

12.1 Emergency Identification and Control

Iberdrola Australia, in collaboration with its appointed contractor have conducted a thorough and systematic identification and analysis of each kind of emergency that could reasonably foreseeably arise from both vessel and Licence activities in accordance with Regulation 91(2)(a) and (b) of the OEI Regulations.

Each kind of emergency identified has been individually analysed following the risk-based process described in Section 10.2. The assessment, application of control measures and plan for responding to each kind of emergency that may reasonably foreseeably arise from Licence activities are documented in the contractor's Project Execution Plan (PEP), Activity (Emergency Response Plan - ERP) and associated documentation.

12.2 Emergency Response Planning

The emergency response planning for the Licence activities (described in Section 0 of this Management Plan) has involved the development of emergency response arrangements, addressing the capabilities, roles and responsibilities of Iberdrola Australia, the contractor and the vessel subcontractor that may provide expertise, personnel, equipment or resources that may be necessary to respond to an emergency.

Emergency planning includes defined procedures to ensure a rapid and effective response as well as robust communication protocols to ensure a timely notification and coordination with workers, emergency services and other relevant stakeholders.

Each Activity ERP is supported by a number of documents and procedures. Together, these documents provide a robust and integrated framework that supports emergency preparedness and response, ensuring compliance with legislative requirements and alignment with Iberdrola Australia and activity contractor's relevant policies and procedures.

12.2.1 ERP Bridging

Specific to the activities described in this Management Plan, alignment of ERPs will be achieved by bridging of the vessel ERP/SMS to the Activity ERP and will follow the principles and be supported where required by Iberdrola's emergency response procedures.

12.2.2 Vessel Preparedness for Emergencies

Vessels that are operating in support of Licence activities are regulated under international and domestic maritime requirements and do not account as Licence infrastructure. Vessels contracted for Licence activities will adhere to the relevant regulatory requirements and subsequent Marine Orders, including maintain their respective vessel SMS / ERP.

12.2.3 Capabilities, Roles and Responsibilities

The Emergency Response Plan (ERP) outlines the emergency capabilities and responsibilities of Iberdrola Australia, the activity contractor, and the vessel operator. It details how personnel, equipment, and resources will be coordinated for a rapid and effective response, with clear roles, communication protocols, and procedures. The ERP includes flowcharts describing responsibilities for various emergency scenarios, while vessel-specific roles are detailed in each

vessel's SMS/ERP. In an emergency, the Activity ERP is activated, followed by Iberdrola Australia's broader emergency procedures based on the situation's severity.

12.2.4 Responding to and Communication of an Emergency

The contractor Project/Duty Manager or Party Chief will provide a copy of the Activity ERP to all relevant workers and Vessel Master prior to departure from Port. A copy of the Activity ERP will be kept on board the vessel, with the last page (which includes the contact details and communication flow) posted on the vessel bridge. Iberdrola Australia's designated PIC will make copies of the Activity ERP available to all Iberdrola Australia personnel that may get involve in responding to an emergency.

A structured decision-making process will be used to determine the appropriate escalation level based on the severity and nature of the event (tiered system). The tiered system ranks emergencies based on the severity of the kind of emergency and relevant actions associated with that tier. Flowcharts describe the procedure for responding to each kind of emergency (and the associated tier categorisation) that may reasonably arise from Licence and vessel activities

Offshore incidents will be managed from the respective vessel as per International Safety Management (ISM) Code.

12.3 Training and Certification

In accordance with Regulation 91(2)(g) of the OEI Regulations, Iberdrola Australia will ensure the appropriate training and certification of all persons and organisations who could reasonably foreseeably be involved in an emergency in relation to Licence activities.

12.4 Testing and Monitoring

In accordance with Regulation 91(2)(f) of the OEI Regulations, this section describes how Iberdrola Australia will take measures for monitoring the effectiveness of emergency response arrangements and capabilities, including how the emergency response arrangements will be tested to maintain response readiness.

12.4.1 Testing

Emergency response plan (ERP) testing ensures readiness and continuous improvement, following international best practices. Tests—such as desktop exercises, communication checks, and unannounced drills—are conducted at minimum in accordance with OEI Regulation 91(3). Results are reviewed by Iberdrola Australia's PIC and HSE Managers to assess effectiveness, identify gaps, and update the ERP as needed.

12.4.2 Monitoring

Iberdrola Australia and its contractors will undertake periodic monitoring starting at each mobilisation continuing through the duration of each activity to completion. This information will be collected, and this data will form part of the permanent record of compliance maintained by Iberdrola Australia. Note this includes monitoring and recording of testing of the ERP arrangements.

12.5 Notification and Reporting

Notifications will comply with the OEI and WHS Acts and Regulations and follow the reporting requirements specified in the Activity ERP. Incidents are categorized and reported according to the Incident Reporting Procedure, with all health, safety, and environmental incidents identified by contractors reported to Iberdrola Australia

Work health and safety incidents and events will be reported as described in Section 11.4. All incidents considered notifiable under the OEI Act will be notified and reported as detailed below and in Section 14, as required by the OEI Regulations.

12.6 Review and Revision

Risk assessments for the Activity ERP will be reviewed after incidents, near-misses, or significant operational changes to ensure continued relevance and effectiveness. Regular updates include reviewing emergency procedures, testing response plans, and updating personnel. These reviews occur at least annually or when major changes arise. Internal audits and ongoing monitoring help identify new or evolving risks, verify the effectiveness of controls, and support continuous improvement of the ERP, WHSMS, and overall Management System.

13. Record Keeping

13 Record Keeping

Iberdrola Australia will keep all accounts, records and other documents in accordance with the OEI Regulations and WHS provisions, available at Iberdrola Australia's offices:

Northern Tower	Governor Phillip Tower
Level 40, 80 Collins St,	Level 22, 22/1 Farrer Pl,
Melbourne VIC 3000	Sydney NSW 2000

A records management system has been established to track all incoming and outgoing communication and documents. Iberdrola Australia also established an electronic mail system to record all relevant correspondence.

14. Notifications

14 Notifications

All project personnel, including contractors, are required to report notifiable incidents, including environmental and health and safety incidents in accordance with OEI Regulations and WHS Act. Iberdrola Australia has in place an Incident Reporting Procedure, designed to ensure that each incident, hazard or near miss is investigated to establish root causes and identify corrective actions.

Relevant regulatory requirements are outlined in Table 14-1 summarising the requirements for notification including the required information, timing, type and recipient. In the event Iberdrola Australia submits a notification to the Regulator a report will be prepared and given to the Regulator before the end of 48 hours after the notification.

Iberdrola Australia will notify the OIR at least 30 days before the commencement of License activities, and no more than 30 days after the completion of a Licence Activity.

Table 14-1: Summary of Relevant Reporting Requirements

Category	Requirements	Required Information	Timing	Type	Recipient
AMSA Reporting	In consultation AMSA requests notification of reportable vessel incidents under Marine Safety (*Domestic Commercial Vessel) National Law Act 2012*, Schedule 1 including: ▪ The loss of a vessel ▪ A collision with another vessel or an object ▪ The grounding, sinking, flooding or capsizing of a vessel ▪ A fire ▪ A loss of stability that affects the safety of the vessel ▪ A close quarters situation ▪ The death or injury, or possible death or injury, of a person on board; and ▪ The loss, or possible loss, of a person from a vessel.	A written report must contain: ▪ Incident details (date and time) ▪ Location ▪ Type of incident ▪ Incident description ▪ Vessels involved ▪ Persons involved; and ▪ Details of assistance rendered/received at incident.	Within 72 hours of the incident Any spills greater than 10 tonnes in Commonwealth waters must be reported to AMSA (via AusSar) within one hour, via the national 24-hour emergency notification	Written	AMSA
First Nations Reporting	Any hydrocarbon spill to the marine environment	Notify relevant First Nations groups in the event of a hydrocarbon spill to the marine environment.	Within 72 hours of the incident	Written	Relevant First Nations groups
DCCEEW Reporting	Any harm or mortality to EPBC Act-listed threatened marine fauna.	Notification of any harm or mortality to an EPBC listed species of marine fauna whether attributable to the activity or not	Email: EPBC.permits@environment.gov.au	Written	DCCEEW
	Recording and reporting of all cetacean sightings	Record of all cetacean sightings	Forms emailed to within 3 months of sighting	Written	AMMC and DCCEEW
Australian Marine	Any ship strike incident to be recorded on national ship strike database	Notification of any vessel strike to whales Ship strike report:	https://data.marinemammals.gov.au/report/shipstrike	Written	NMMC

Category	Requirements	Required Information	Timing	Type	Recipient
Mammal Centre					
OEI Reg 161	Notifiable incident, within the meaning of the Work Health and Safety Act as applied by Part 1 of Chapter 6 of the Act, that arises out of Licence activities	Notification of WHS incident including, but not limited to those outlined in Section 6.2 of OIR Notification and reporting of incidents, events and occurrences guideline	Verbal initial notification – As soon as practicable 1300 674 742 Written report - within 48 hours of initial notification offshorerenewables@oir.gov.au	Verbal Written	OIR
OEI Reg 161	Incident that caused, or should have caused, the Licence Holder to implement the emergency response plan	Notification on incident that caused or may have caused the implementation of the emergency response plan	Verbal initial notification – As soon as practicable 1300 674 742 Written report - within 48 hours of initial notification offshorerenewables@oir.gov.au.	Verbal Written	OIR
OEI Reg 161	Incident that: ▪ Arose in connection with Licence activities carried out in the Commonwealth offshore area; and ▪ Resulted, or has the potential to result, in a contravention of the Licence Holder's obligations under the EPBC Act or regulations under that Act, that are described in the Management Plan in accordance with paragraph 85(2)(a) of this instrument.	Notification of any incident(s) that arose in relation to Licence activities in commonwealth offshore areas including incidents and potential incidents that have or have the potential to impact the obligations of the Licence activities as outlined under the EPBC Act.	Verbal initial notification – As soon as practicable 1300 674 742 Written report - within 48 hours of initial notification offshorerenewables@oir.gov.au.	Verbal Written	OIR
OEI Reg 161	A circumstance that significantly impaired, or has the potential to significantly impair, the operation or structural integrity of Licence infrastructure;	Notification of a circumstance or change in circumstance that has or may potentially significantly impair the structural integrity of Licence infrastructure	Verbal initial notification – As soon as practicable 1300 674 742 Written report - within 48 hours of initial notification offshorerenewables@oir.gov.au.	Verbal Written	OIR

Appendix

APPENDIX A OUTCOME OF MANAGEMENT PLAN STAKEHOLDER CONSULTATION

Stakeholder	Summary of Consultation	Summary of claims made	Assessment of merit of the claim	Measures Implemented
Offshore Electricity Infrastructure (Declared Area OEI 01 2022) Declaration 2022 Conditions				
Department of Defence	The Department of Defence (DoD) was approached on 16 September 2024 and 2 December 2024 regarding award of Feasibility Licence for Aurora Green and studies referred under the EPBC Act, including met ocean monitoring activities. On 10 April 2025, Iberdrola sent the Department of Defence a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. The Department of Defence responded on 29 April 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	NA
Bureau of Meteorology	The Bureau of Meteorology (BoM) was contacted via an online form during September 2024 to advise of Iberdrola Australia's Feasibility Licence for Aurora Green and activities referred under the EPBC Act, including met ocean monitoring activities. On 10 April 2025, Iberdrola sent the BoM a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. The Bureau of Meteorology responded on 16 April 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	NA
Australian Maritime Safety Authority	The Australian Maritime Safety Authority (AMSA) was advised, via email, of Iberdrola Australia's intent to submit a Management Plan for approval to the Offshore Infrastructure Regulator for deployment, monitoring and decommissioning of floating LiDAR equipment. On 10 April 2025, Iberdrola sent AMSA a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. AMSA responded on 1 May 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	No further action required (other than sending a NtM) regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	Commitment to send NtM prior to activity starting
Director of National Parks	On 10 April 2025, Iberdrola sent the Director of National Parks (DNP) a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. The DNP responded on 11 April 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	DNP has advised they do not require further notification of progress made in relation to this activity unless details regarding the activity change and result in an overlap with or new impact to a marine park, or for emergency responses.	NA

Stakeholder	Summary of Consultation	Summary of claims made	Assessment of merit of the claim	Measures Implemented
Titleholders of existing petroleum or greenhouse gas titles	Refer to Section f) below in this table			
Commercial fisher rights holders	Refer to Section f) below in this table			
OEI Regulation 64(1)				
a) Department of State, agency or authority of the Commonwealth, a State or a Territory that has functions that relate to the activities subject to consultation				
DCCEEW	Multiple briefings on the Project have been provided to the DCCEEW, Office of the Australian Minister for Climate Change and Energy; and DEECA, Office of the Minister for Energy & Resources of Victoria from 2022 through to current date. An overview of the proposed survey works including the proposed wind and metocean measurements campaign has been discussed with DCCEEW.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	NA
DEECA				
OWEV	A project overview of the proposed activities was provided	No objections or claims made		
VicGrid	Multiple engagements have occurred with VicGrid to discuss different elements of the Project, though not specific to metocean surveying.	No objections or claims made		
b), c) and d) Aboriginal or Torres Strait Islander people or groups				
Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)	A project overview of the proposed Project was provided, ongoing meetings generally have been mutually scheduled. Specifically, information about survey activities and deployment of floating LiDAR equipment has been shared with GLaWAC. In person meeting held with GLaWAC Project Manager Economic Development on 26 November 2024. Activity in this Management Plan discussed. Advice to contact RAP Manager. RAP Manager emailed and phoned on 6 January 2025. On 13 February 2025 GLaWAC and Iberdrola Australia signed a landmark engagement agreement. On 14 April 2025, Iberdrola sent GLaWAC a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. A follow-up phone call was made on 16 April 2025. GLaWAC responded on 2 May 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project	NA
e) the holder of any other Licence granted under the Act				
12 Gippsland Offshore Wind Licence Holders	The Gippsland Licence Holders meet on a frequent basis and have conducted combined community engagement sessions. Iberdrola Australia has also discussed metocean activities specifically related to the Project at the OG-12 Fishing Sub Group meetings which has included all developers.	No objections or claims made	Consultation will be ongoing throughout the broader Project.	NA
JERA Nex (Blue Mackerel) and Corio Generation (Great Eastern Offshore Wind)	Given the close proximity of the JERA Nex and CORIO Licences, Iberdrola Australia sent dedicated emails to neighbouring JERA Nex and Corio prior to ocean surveys starting which included a map and indicative timing.	No objections or claims made	Consultation will be ongoing throughout the broader Project.	NA
f) people or organisations that may carry out activities in or near the Licence Area for a commercial purpose, under a Licence or permit issued under law				
Tasmanian Gas Pipeline	The Licence Area is traversed by the Tasmanian Gas Pipelines connecting Tasmania with mainland Australia at Seaspray. Emails with maps and a detailed description of the activity, and a phone conversation, have occurred with Tasmanian Gas Pipelines. It was determined the activity in this MP would not impact the pipeline.	No objections or claims made	Consultation will be ongoing throughout the broader Project.	NA

Stakeholder	Summary of Consultation	Summary of claims made	Assessment of merit of the claim	Measures Implemented
	Tasmanian Gas Pipeline responded on 24 April 2025, confirming they have no objections or claim regarding the activity.			
Victorian State Government (represented by the CarbonNet Project) for the purpose of greenhouse gas title G-5-AP held by the Crown in right of Victoria	On 11 April 2025, Iberdrola sent the CarbonNet a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. CarbonNet responded on 17 April 2025, confirming they are the relevant representative of the title holder and have no objections or claim regarding the activity.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	NA
Esso / ExxonMobil	Briefing on 20 December to advise Esso of upcoming marine survey activities and met ocean deployment. Parties agreed to continue to share information about surveys and met ocean deployment. On 11th April 2025, Iberdrola sent Esso a further consultation email that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. Esso responded on 23 April 2025, confirming they have no objections or claim regarding the activity.	No objections or claims made	Consultation will be ongoing throughout the broader Project.	NA
3D Energi	3D Energi was contacted on 4 November and offered a project briefing. No response was received from 3D Energi.	No response was received from the stakeholder.	Consultation will be ongoing throughout the broader Project.	NA
SETFIA and SSIA	Oct 2024 Meeting Would like a coordinated approach from developers Would like consultation on Floating LiDAR Buoy locations and other activities SETFIA SMS service can reach 140 boats and can be used to notify of activity Fishers want to understand impacts and compensation Possible benefits fund to support initiatives for industry	Yes. Would like further consultation on potential locations for LiDAR buoys	Iberdrola Australia to further consult on Floating LiDAR locations and commission SETFIA to consult with fishers and provide a report back to Iberdrola Australia on feedback received.	Recommendations made in the SETFIA's LiDAR Investigation Report (prepared for Iberdrola Australia) are addressed and implemented. Adjustments to the buoy deployment plan, as suggested by stakeholders, will be implemented. Iberdrola Australia has committed to deploying equipment in a linear layout as requested by fishers. Iberdrola Australia has also taken on board comments regarding visibility and buoy identification and is compliant with IALA (AMSA) marking and lighting requirements. Iberdrola Australia is committed to notifying fishers on timing and location of activities in a manner preferable to the fishers
	SETFIA commissioned report: Iberdrola LiDAR Investigation report	Yes The fishers raised concern about study work potentially impacting fishing activity. Fishers raised concern on the alignment of the study equipment and the following recommendations were made: Equipping buoys with lights for clear visibility at night. Installing radar reflectors on buoys to enhance detection on vessel radar systems. If multiple buoys are being deployed this should occur in a linear configuration with a bearing of 55° true, aligning with the direction in which shark fishing equipment is deployed. This would minimize operational disruption to fishing. Utilise the SETFIA SMS service to advise vessels of locations. For simplicity SETFIA is proposing	Iberdrola Australia considers sufficient information over a reasonable period was provided to the stakeholder. Following these discussions, feedback was gathered regarding the proposed locations for the LIDAR buoys. While the general response was positive, several important considerations were raised concerning transit zones, visibility, and interactions with fisheries operating in the area. The feedback highlighted the importance of considering navigational safety and minimising interference with existing fisheries. Adjustments to the buoy deployment	

Stakeholder	Summary of Consultation	Summary of claims made	Assessment of merit of the claim	Measures Implemented
		to issue a central cloud-based list of all offshore wind infrastructure and to SMS a link to this 'live' list regularly to the SE fleet. Consult with Seafood Industry Victoria about the six active Victorian-Licenced fisheries overlapping the Licence Area. All further communications containing charts should also show an overlap of Esso's oil/gas assets for context.	plan, as suggested by stakeholders, will be implemented. Iberdrola Australia commits to ongoing consultation with the stakeholder.	
	On 15 April 2025, Iberdrola sent SETFIA and SSIA a further consultation email and that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. An email response was received on 22 April 2025	Yes Request that in NtM the request to maintain 500 metres from equipment is noted as a "request", as opposed to as a formal exclusion zone. This was agreed and will be communicated as such in the NtM.	Iberdrola Australia considers sufficient information over a reasonable period was provided to the stakeholder. Iberdrola Australia commits to ongoing consultation with the stakeholder.	NtM to be sent and conveyed through SETFIA's text message service.
Seafood Industry Victoria (SIV)	Nov 2024: Briefing via OG-12 subgroup Can act as channel to members but not substitute for direct engagement SIV CEO agreed to publish metocean activity notice in the 'SIV Friday Update' viewed by SIV members. This was published on 17 January 2025. On 15 April 2025, Iberdrola sent SIV a further consultation email and that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe • A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. SIV responded on 17 April 2025, expressing no objections or claim regarding the activity.	No objections or claims made	No further action required in relation to this activity.	NtM to be sent for communication in SIV Friday Update.
Lakes Entrance Fishermen Limited (formerly LEFCOL)	16 December 2024: Meeting at Off the Wharf Café Attendees: 12 attendees including shark and gillnet fishers and a scallop farmer. Summary of Meeting: • Fishing is the identity of the region not just a commercial activity • Comparisons to UK unhelpful because of the different context • Direct engagement is a good approach. • Gummy shark fishers key group at the LEF ltd • Warf engagement not recommended • Compensation and benefits need to be considered and developed collaboratively • Fishers requested coordinates of study kit (Floating LiDAR Buoy and associated equipment) in WGS84 format.	Objection/claim made: Yes The fishers raised concern about study work potentially impacting fishing activity. Fishers raised concern on the alignment of the study equipment and the following recommendations were made: If multiple buoys are being deployed this should occur in a linear configuration with a bearing of 55° true, aligning with the direction in which shark fishing equipment is deployed. This would minimize operational disruption to fishing. Fishers requested coordinates of proposed locations for study kit.	Iberdrola Australia considers sufficient information over a reasonable period was provided to the stakeholder. Following these discussions, feedback was gathered regarding the proposed locations for the LiDAR buoy. Coordinates were provided to fishers as requested, as was a summary of the meeting. Adjustments to the buoy deployment plan, as suggested by stakeholders, can and will be implemented. Iberdrola Australia commits to ongoing consultation with the stakeholder.	Iberdrola Australia: • Committed to notify fishers on timing and location in a manner preferable to the fishers • Committed to deploying equipment in a linear layout as requested by fishers
	On 20 December 2024, Iberdrola Australia sent an email to the attendees detailing the following: • Provided the WGS84 coordinates in an excel spreadsheet of a potential study location. • Schematic of deployment one and a more zoomed out version with the site boundary, both include bathymetry and contour information. • A reminder Iberdrola Australia are only deploying Floating LiDAR Buoy in one location, and this will include three pieces of kit.	Assessment of Merit: The claim was assessed and determined to have merit. Iberdrola Australia: • Provided the WGS84 coordinates of the study location • Provided a schematic of deployment one and a more zoomed out version with the site		

Stakeholder	Summary of Consultation	Summary of claims made	Assessment of merit of the claim	Measures Implemented
	We've taken on board your feedback to deploy this equipment in a linear fashion. Deployment is planned for early 2025 and committed to keeping the fishers informed of exact timing and location.	boundary, both include bathymetry and contour information. • Committed to notify fishers on timing and location in a manner preferable to the fishers • Committed to deploying equipment in a linear fashion as requested by fishers		
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 Licence activities				
Communities of: Seaspray, Traralgon, Foster, Yarram, Port Albert, Golden Beach and Sale	Project information was made available to community members attending the OG-12 community engagement sessions held throughout 2024 and 2025 at each of the communities listed.	No objections or claims made	No further action required in relation to this activity.	NA
Wellington Shire Council **Latrobe City Council** **South Gippsland Shire Council**	Iberdrola Australia has well established relationships with each of the six local Councils in Gippsland, with Wellington Shire Council, Latrobe City Council, and South Gippsland Shire Council being the three most directly connected to the Gippsland energy transition. Multiple briefings have been provided during 2023, 2024 and 2025, and Iberdrola Australia is represented on the Wellington Energy Forum (hosted by Wellington Shire Council). Formal notification and consultation on the proposed activities will be undertaken concurrent to the assessment of the EPBC referral application. Consultation with relevant Councils would be ongoing throughout the proposed activities.	No objections or claims made	No further action required regarding the current activity covered by this Management Plan. Consultation will be ongoing throughout the broader Project.	NA
h) any organisation representing recreational fishers whose activities the Licence Holder reasonably considers may be directly affected by the Licence activities				
VR Fish	November 2024: Email to request Project introduction and meeting. Awaiting response On 14 April 2025, Iberdrola sent VR Fish a consultation email and factsheet that detailed: • Description of the activities planned to be undertaken • Purpose of the engagement • The location • Timeframe A request for feedback in a timely manner; to review, respond and incorporate in the Management Plan. Follow up email was sent on 23 April 2025. At the time of writing this Management Plan no response was received.	No objections or claims raised to date	Iberdrola Australia commits to ongoing consultation with the stakeholder. Iberdrola Australia considers no further action is required due to the activity occurring in an area not frequented by recreational fishers.	NA