GIPPSLAND DAWN OFFSHORE WIND PROJECT

Management Plan Summary under OEI Act and Feasibility Licence FL-007
Revision 0

BlueFloat Energy acknowledges the Gunaikurnai people as the Traditional Custodians of the area in which our Project will be located and we respect their deep and enduring connection to the land, waterways and the sea.

Table of Contents

Document revision table					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
0	Issued for Use	RL / BV / COR / AW	AW	DW	13 June 2025

Acronyms, abbreviations and key terms

Acronym, Abbreviation	Description
AIS	Automatic Identification System
BIA	Biologically Important Area
BFE	BlueFloat Energy
BOSIET	Basic Offshore Safety Induction and Emergency Training
DCCEEW	Department of Climate Change, Energy, the Environment and Water
Engagement Plan	Gippsland Dawn Stakeholder Engagement Plan
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EPBC Regulations	Environment Protection and Biodiversity Conservation Regulations 2000
FLA	Feasibility Licence Area
GDOWP	Gippsland Dawn Offshore Wind Project
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
GPS	Global Positioning System
HAZID	Hazard Identification
HIPO	High Potential Event
HSE	Health, Safety and Environment
HSSEQ	Health, Safety, Security, Environment and Quality
IAP2	International Association for Public Participation
IMCA	International Marine Contractors Association
IPA	Indigenous Protection Area
KEF	Key Ecological Features
LAT	Lowest Astronomical Tide
LiDAR	Light Detection and Ranging
MNES	Matter of National Environmental Significance
OEI Act	*Offshore Electricity Infrastructure Act 2021*
OHS Act	*Occupational Health and Safety Act 2004*
OIR	Offshore Infrastructure Regulator
OWP	Offshore Wind Project
PCBU	Person Conducting a Business or Undertaking
PMST	Protected Matters Search Tool
RAAF	Royal Australian Airforce
SMS	Short Message Service
SWIFFT	State Wide Integrated Flora and Fauna Teams
STWC95	Standards of Training, Certification and Watchkeeping for Seafarers
TEC	Threatened Ecological Communities
WHS Act	*Work Health and Safety Act 2011*

Units

Unit	Unit
H_s	Significant Wave Height
km	Kilometers
m	Meter
NM	Nautical Miles
S	Second
T_p	Peak Wave Period

1. INTRODUCTION

1.1. Background

BlueFloat Energy (BFE) is a global offshore wind developer developing the Gippsland Dawn Offshore Wind Project (the Project) under a subsidiary (Australian) business, the Gippsland Dawn OWP Project Pty Ltd (GDOWP). The Project is located 10 km – 33 km offshore Gippsland, Victoria, between Loch Sport and Paradise Beach.

Under Feasibility Licence FL-007, GDOWP is proposing to undertake wind resource and metocean monitoring as the first in a suite of preliminary feasibility studies required to inform the development of the project. This monitoring will be undertaken using a floating Light Detection and Ranging (LiDAR) buoy. The objective of the proposed wind resource and metocean monitoring is to obtain site-specific baseline data on wind, wave and current conditions, water level and atmospheric conditions. A management plan for the activity, as required under the *Offshore Electricity Infrastructure Act 2021* (OEI Act), was submitted and subsequently approved on 12 May 2025 by the Offshore Infrastructure Regulator (OIR).

This document is a summary of the approved management plan as required under Section 115A of the OEI Act and Regulations 76 and 77 of the *Offshore Electricity Infrastructure Amendment Regulations 2024*.

Table 1-1 provides a reference to where in the summary document the provisions of regulation 77 have been met in this document.

Table 1-1 Management plan summary requirement reference sections

OEI Amendment Regulations 2024 - Requirement	Management Plan Summary Reference
Section 77(3)(a) (requirements for summary of management plan)	Section 3.1.4.4
Section 77(3)(b) (requirements for summary of management plan)	Section 4.8
Section 80 (description of activities and operations)	Section 2
Section 81 (consultation)	Section 3, Appendix A
Section 82 (stakeholder engagement)	Section 3, Appendix A
Section 83 (management system)	Section 4
Section 84 (conditions of licence)	Section 5
Section 85 (obligations under the Environment Protection and Biodiversity Conservation Act 1999)	Section 6
Section 88 (maintenance of relevant structures, equipment and property)	Section 2.8.3
Section 89 (decommissioning of licence infrastructure)	Section 2.8.4
Section 90 (removal of relevant structures, equipment and property, and remediation)	Section 2.8.4
Section 91 (emergency management)	Section 7
Section 94 (work health and safety)	Section 8

2. Activity Description and Operations

2.1. Existing environment

The physical environment of the feasibility licence area (FLA) and the broader area (7.5km buffer around the FLA and an area of investigation for cable routes) is described in Table 2-1.

Table 2-1 Physical components of the environment relevant to the licence activity

Feature	Description of component character
Oceanography	Bass Strait is characterised by: • Shallow water and weak tidal currents. • Slow easterly flow of waters. • Wind speeds are in the range of 10 to 30 km an hour, predominantly westerly during winter and easterly during summer. • Temperatures in subsurface waters range from about 13ºC in August/September and 16ºC in February/March • Oceanography is a component of the Commonwealth Marine Area Matter of National Environmental Significance (MNES).
Bathymetry	Depth contours range from around 20-50 m
Geophysical conditions	The seascape is largely comprised of sandy sediment flats, interspersed with small patches of reef, bedrock, and consolidated sediment. Substrate is a mix of sand and shell.
Sediment quality	There is no indication of any major or minor spills having occurred in the broader study area, however there may be some residual pollutants in the sediment that surrounds oil wells in the area.
Water quality	There is no available data on water quality within the marine environment. However, the water quality in the onshore Gippsland catchment was mostly recorded as 'Very Good, Good or Fair' in 2022/23, which would indicate that water quality within the marine environment would also likely be of a similar quality.
Benthic substrate	The benthic substrate of the broader study area is characterised by sand, silt, and gravel.

2.2. Ecological sensitivities

Table 2-2 summarises the ecological sensitivities that were identified through a Protected Matters Search Tool (PMST) search. While several MNES and Biologically Important Areas (BIAs) were identified as overlapping or immediately adjacent, it is noted that many of these are not relevant in terms of the risk of a significant impact from the deployment and operation of the LiDAR buoy.

Table 2-2 Matters of National Environmental Significance and other ecologically sensitive areas overlapping or immediately adjacent to the broader study area.

Feature	Overlap with LiDAR area	Description of component character
Matters of National Environmental Significance		
Commonwealth Marine Area	Yes	The broader study area includes Commonwealth and State waters; however, the LiDAR buoy is located within the Commonwealth Marine Area. All components and features of the environment are part of the Commonwealth Marine Area, including the benthic environment. Low profile, deeper water (>20 m) reefs are scattered throughout the broader Bass Straight region and are notable for supporting a diverse range of sessile invertebrates such as sponges, bryozoans, and gorgonians (BMT, 2024). Although no benthic habitat mapping has been conducted within the broader study area, surveys in the area have identified large patches of bivalves and scallops, sponge and screw shell aggregations and a variety of small mobile animals such as crustaceans, bivalves, sponges, worm tubes and polychaete worms. However, the marine flora identified in these surveys is typically sparsely distributed, and no significant threatened flora species have been identified. The benthic substrate of the broader study area is characterised by sand, silt, and gravel.

Feature	Overlap with LiDAR area	Description of component character
Listed threatened species	Yes	The PMST for the broader study area identified 85 listed threatened species as potentially occurring. This includes: • 37 bird species • 7 marine mammal species • 3 marine reptile species • 8 species of sharks and fish
Listed migratory species	Yes	There are an additional nineteen species that are listed as "Migratory" in the broader study area but are not considered threatened: • Fourteen bird species • Three marine mammal species • Two species of sharks and fish
Wetlands of international important (Ramsar)	No	The broader study area does not overlap with any Ramsar areas however the Gippsland Lakes Ramsar Wetlands is located approximately 20 km northwest. The nominal location and buffer zone of the LiDAR buoy is approximately 20 km offshore.
Threatened ecological communities	No	The broader study area identifies two Threatened Ecological Communities in proximity to the broader study area, however they both are terrestrial and not relevant to the deployment of the LiDAR buoy which will be located 20 km offshore.
Other Marine Protected Areas and Sensitive Areas		
Biologically Important Areas	Yes	The broader study area overlaps 12 BIAs. <u>Seabirds</u> • Short-tailed Shearwater (foraging) • Wandering Albatross (foraging) • Common Diving-petrel (foraging) • Bullers Albatross (foraging) • Shy Albatross (foraging likely) • Indian Yellow-nosed Albatross (foraging) • Black-browed Albatross (foraging) • Campbell Albatross (foraging) <u>Sharks</u> • White Shark (breeding nursery area) <u>Marine mammals</u> • Southern right whale (reproduction* and migration) • Pygmy Blue Whale (foraging)
Key Ecological Features	No	The broader study area does not overlap with any Key Ecological Features (KEF). The nearest KEF is the Upwelling east of Eden, which can be located 10.5 km to the northeast of the FLA boundary. There is potential for higher numbers of blue whales, humpback whales and other species that may use the upwelling for foraging to be present within the area or migrating through it to reach the upwelling.

* The southern right whale reproduction BIA is classified as habitat critical to the survival of the species as per the National Recovery Plan for this species.

2.3. Cultural and heritage values

Although no known locations of indigenous or European/marine heritage overlap the licence area, there are heritage values located adjacent to the licence area. These are summarised in Table 2-3.

Table 2-3 Cultural and heritage values

Feature	Description of component character
Indigenous cultural heritage	The Gippsland region sits within the Nanjit to Mallacoota Sea Country of the Gunaikurnai people of south-eastern Victoria. The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) signed an agreement in 2022 with the Federal Government to begin the establishment of this Sea Country Indigenous Protection Area (IPA) (GLaWAC, 2024). Although the IPA does not directly overlap the licence area, it is located in adjacent coastal waters along the Gippsland coast (GLaWAC, 2024). Indigenous peoples' association with the marine environment goes well beyond the current shoreline to the edge of the continental shelf; this association extends back to when sea levels were lower, and country was not under water and accessible.

European and marine heritage	The Commonwealth maintains a register of underwater cultural heritage, (Australasian Underwater Cultural Heritage Database) which includes shipwrecks or other items of maritime historical interest such as WW2 plane wrecks. There are no records of shipwrecks within the feasibility licence area. Two records of shipwrecks were identified within the broader study area (BMT, 2024), however given the limited nature and scale of the licence activity, they are not relevant to the management plan. Other unknown shipwrecks may be present but have not been sited.

2.4. Other marine users

The broader study area has had historical and current use by multiple industries including commercial fisheries, oil and gas activities, shipping, and defence (BMT, 2024). These are summarised in Table 2-4.

Table 2-4 Other marine users in the broader study area.

Feature	Description of component character
Defence areas	The broader study area is located within the Defence consultation zone for the Gippsland Declared Area as it is within an 80 nautical mile radius of the Royal Australian Airforce (RAAF) Base East Sale. There are no known active defence training areas within proximity of the broader study area. According to Department of Defence mapping, the offshore area between Seaspray and Rotamah Island has historically been used as an Air Weapons range, and a small location approximately 25 km offshore of Lakes Entrance that is just outside the 7.5 km buffer area was identified as a potential disposal site for depth charges.
Fisheries	A number of commercial fisheries exist within the broader study area or nearby surrounds. Commonwealth fisheries • Southern and eastern Scalefish and Shark Fishery • Bass Strait Central Zone Scallop Fishery • Small pelagic fishery • Southern Bluefin Tuna fishery • Southern Squid Jig Fishery • Eastern Skipjack Tuna Fishery • Eastern Tuna and Billfish Fishery. State fisheries • Eastern rock lobster zone • Central and eastern abalone zone • Scallop fishery • Octopus fishery Recreational fishing activities exist in the offshore East Gippsland region, however there is unlikely to be many recreational fishers using the broader study area as most would likely concentrate in the lakes and estuaries which can be fished from smaller vessels.
Oil and gas leases	GDOWP overlaps with two of Esso's production licence zones, VIC/L18 and VIC/L2 – These zones contain the Barracouta and Whiting facilities. GDOWP also overlaps the unassigned zone VIC/P57 which was previously leased to Hibiscus / 3D Oil for exploration but was returned to the regulatory body NOPTA.
Tourism and recreation	Recreational activities offshore of the East Gippsland region include recreational fishing, diving, and boating. There are boat ramps at Seaspray and Lakes Entrance (with Lakes Entrance being a popular launch spot) however most recreational fishers would likely concentrate in the lakes and estuaries which can be fished from smaller vessels.

Shipping and vessel traffic	The 2023 vessel tracking information for the region shows the main shipping channel from the Port of Melbourne is outside of the broader study area. There are also significant vessel movements from the Port of Corner Inlet and Port Albert and Lakes Entrance through the area. Lakes Entrance and Port of Gippsland Lakes sees large amounts of recreational traffic given the calm waters of the lakes and its tourist attraction given its Ramsar wetland status, however an ocean entrance to Bass Strait was opened in 1889 that sees this port also used for commercial vessels (Gippsland Ports, 2016). Lakes Entrance is also utilised for commercial fishing and service vessel launching for servicing of offshore oil and gas operations. The Port of Corner Inlet and Port Albert, although further from the broader study area, caters for amateur and professional fishermen, leisure boating, charter vessels and larger commercial vessels and therefore may see some traffic through the broader study area. The hot spots off the coast are potential representations of key fishing spots. There is also a public boat ramp at Seaspray, and Delray Beach (Golden Beach) which supports recreational vessels in the broader study area.

2.5. Feasibility Licence Area

The FLA of GDOWP is located 10–33 kilometres off the coast between Paradise Beach and Ocean Grange in the Gippsland offshore wind declared area. The total area is 469km² and its boundary coordinates are stipulated in Table 2-5 below.

Table 2-5 Boundary coordinates for GDOWP FLA

Point ID	Easting	Northing
P1	147°44’32.0993” E	38°05’26.9500” S
P2	147°40’32.2492” E	38°08’01.4000” S
P3	147°32’52.9890” E	38°13’29.8863” S
P4	147°38’01.5142” E	38°15’58.1579” S
P5	147°40’06.4096” E	38°15’04.5867” S
P6	147°42’39.3937” E	38°15’23.1197” S
P7	147°48’34.8549” E	38°18’38.2931” S
P8	147°54’23.4985” E	38°14’53.9936” S
P9	147°54’29.2147” E	38°08’30.3035” S
P10	147°48’42.2501” E	38°05’26.9514” S
GDA94		

2.6. Licence Activity Location

The LiDAR buoy will be deployed at one location within the licence area (Figure 2-1).

Micro-siting within 500 m of the planned location may be required if the selected location is found to be unsuitable. The LiDAR buoy location does not overlap with (or come within 500 m of) any of the following features or their corresponding safety, protection or exclusion zones (Figure 2-1):

- Marine infrastructure, including pipelines, wells, platforms and subsea facilities (for example, plugged and abandoned wells)
- Known shipwrecks.

The LiDAR buoy location, together with the 500 m buffer zone around the target location is depicted in Figure 2-1. The GPS coordinates of the final deployment location will be recorded.

There are no safety or protection zones to be established around the LiDAR buoy itself.

Table 2-6 Offshore renewable energy infrastructure (OREI) relevant for the feasibility activities.

Infrastructure	Water Depth	Details	Status	Timeframe
LiDAR buoy	Approximately 46 m	One LiDAR buoy and associated mooring system.	To be deployed	To be removed within a maximum of 30 months of deployment

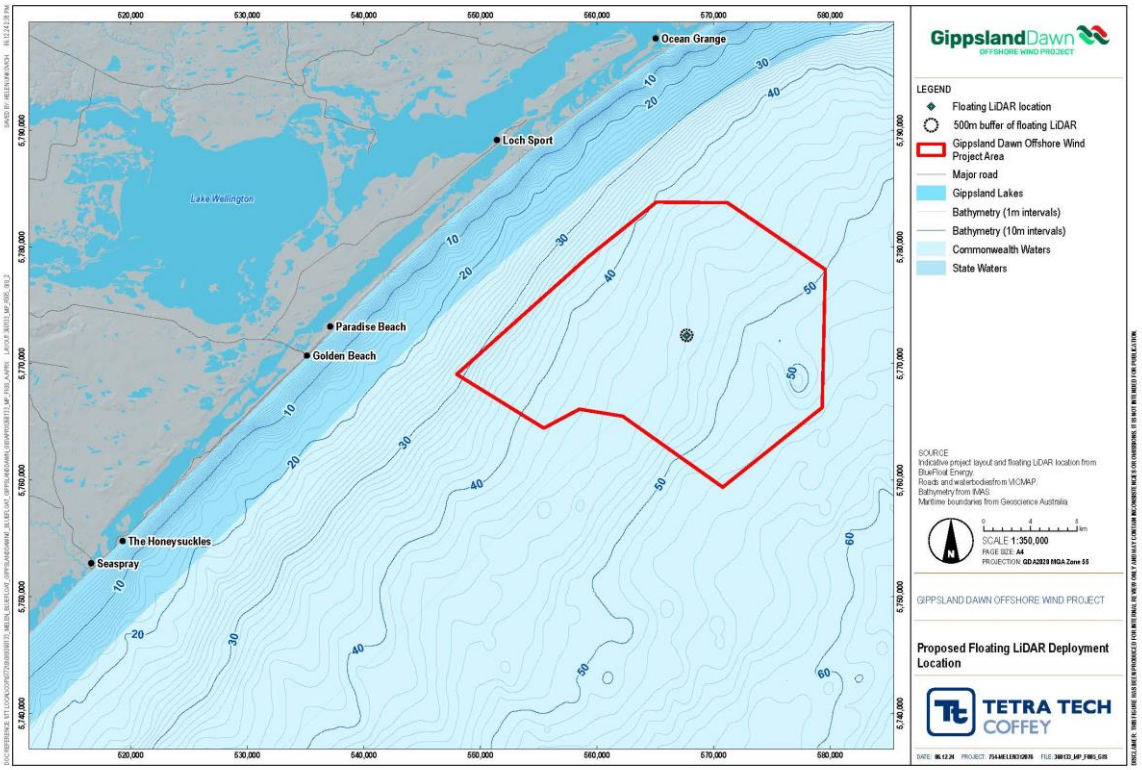

Figure 2-1 Map showing LiDAR buoy deployment target location and 500 m buffer zone.

2.7. Description of the Floating LiDAR unit system

The floating LiDAR system comprises of two units.

1. The floating LiDAR buoy which has various instruments and devices attached to it. This sits above and just below the sea level.
2. The mooring and anchor system which holds the buoy in position and also is fitted with several subsea surface devices.

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

Table 2-7 Floating LiDAR buoy and mooring and anchor system components and associated descriptions

Component	Function / Description
Floating LiDAR Buoy	
ZX LiDAR	Measures wind profile, speed, and direction (10–300 m above sea level)
Inertial Labs WS-PD GNSS	Measures wave, motion, and GPS location
Wind Observer Anemometer	Measures wind speed and direction at a fixed height
Vaisala WXT536	Measures air temperature, humidity, barometric pressure, and rainfall
Dual Iridium	Satellite data transmission and GPS tracking
AIS & Navigational Lights	Provides communication and ensures navigational safety
Flexible Solar Panels	Power source for the buoy
Nortek Signature500	Current profiler in buoy's keel (~3 m below sea level)
Seaguard Water Level Recorder	Secondary water level measurement near the anchor
Tide Gauge	Internally logging device mounted on the main anchor
Transponder	Location beacon to recover anchor if mooring is compromised
Mooring and Anchor System	
Rubber Cords	Absorb shock loads in the mooring system
Floats	Maintain configuration of the mooring system
Acoustic Releases	Allow controlled system recovery
Shackles, Chains, Master Links	Mechanical components for secure connections
3T Gravity Anchor	Ensures station-keeping and overall stability

Figure 2-2 RPS LiDAR 3.5 Buoy (Source: RPS, 2024a)

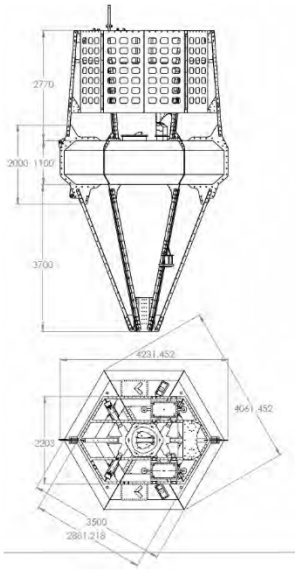

Figure 2-3 RPS LiDAR 3.5 Buoy Schematic (Source: RPS, 2024a)

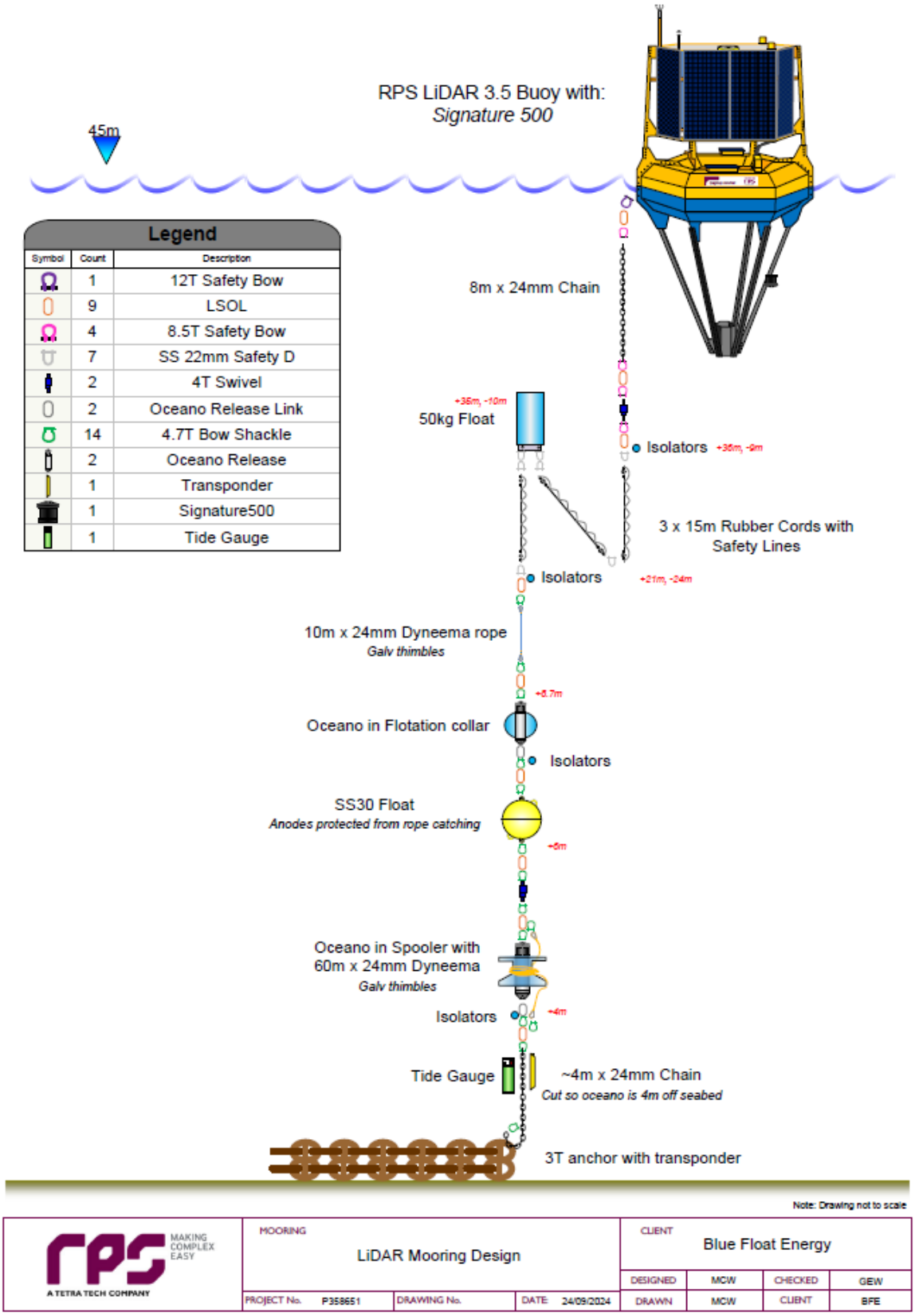

Figure 2-4 Representative preliminary mooring design (Source: RPS, 2024b)

2.8. Operation Detail of Licence Activities

2.8.1. Installation of Floating LiDAR System

The floating LiDAR system is deployed approximately 80 nautical miles from port. Prior to deployment, the buoy is constructed, undergoes site acceptance testing, and has its keel installed to prepare for operational use in metocean monitoring. Once safely lifted into water at wharf, the installation process for the floating LiDAR buoy mooring system at the intended deployment location follows these steps:

Step 1: The floating LiDAR buoy will be towed to the deployment location at approximately 4 knots.

Step 2: Upon arrival at the deployment location, the tow line will be recovered. The floating LiDAR buoy mooring line will be attached and prepared for deployment.

Step 3: The floating LiDAR buoy mooring line will be gradually payed out, via a crane or A-frame, over the stern of the vessel. A 3-tonne anchor, pre-connected to the mooring line, will be lowered over the stern using a winch with quick release system.

Step 4: The quick release will be activated to place the anchor at the intended deployment location The floating LiDAR buoy will be monitored to ensure proper station-keeping and alignment with the intended deployment location.

Details of the mooring line system are specified in above in Figure 2-4.

2.8.2. Vessel requirements

The vessel used for deployment, servicing, and recovery of the floating LiDAR system will depend on availability at the time of operations. Vessel selection will be guided by the specific functional requirements of the work and the need for valid IMCA certification. Required vessel equipment includes a tugger winch, main winch, hydraulic A-frame, vessel crane, stern roller, small craft for port operations (if needed), and communication tools such as radios and a loudspeaker.

2.8.3. Operational details of floating LiDAR system

During operation of the LiDAR buoy, its performance and location is remotely monitored. A satellite tracking beacon is installed on the LiDAR buoy, transmitting positional information every hour. The LiDAR buoy also transmits GPS position every 10 minutes, allowing information on mooring performance and possible drift to be identified. Data is retrieved through satellite Iridium transmissions, as is information on system power health. The buoy is also fitted with 4G mobile options the location is within range of a mobile tower.

Automatic alarms have been configured and are triggered based on continuous telemetered data. Scenarios triggering an automatic alarm and notification include:

- Location fencing alarm in case the mooring system fails, and the buoy starts drifting
- No data received on either transmission system
- Sensor malfunction detected by data QC such as variable flat lining or out of range
- Activation of subsurface PTT satellite beacons

Alarm messages identify the cause, location and instrument serial number. Alarms are sent via email and SMS to alert the LiDAR buoy provider. Should issues be identified in the LiDAR buoy performance, reactive servicing will occur in accordance with the protocol described in Section 2.8.3.1 in order to resolve.

2.8.3.1. Servicing

Service visit workflow and methods will be a combination of the recovery of LiDAR buoy (Section 2.8.4) and deployment (following on-board servicing).

2.8.4. Recovery

At the completion of the measurement program, the LiDAR buoy, anchor and mooring system shall be recovered in full. The following steps will be undertaken to recover the LiDAR buoy from the seabed (RPS 2024a):

Recovery of LiDAR buoy:

1. Position vessel at least 200m away from buoy and acoustic release spooler.
2. Activate top release spooler.
3. Recover the float and connect the LiDAR buoy to a long line. Tether off to side of vessel so buoy is clear.
4. Activate bottom release spooler.
5. Use a snap hook and pole to connect and recover the yellow float and release to buoy.
6. Using the 24mm rope from the spooler, recover the 3T anchor to the surface and over the roller.
7. Prepare the buoy for towing.
8. Secure the deck.
9. Tow to port of operations
10. Lift LiDAR buoy from the water (crane lifting activities). This is considered the final step of the licence activity since the vessel has returned to port and the LiDAR buoy ceases to be in operation and has been removed from the vessel.
11. Following recovery, all raw data is retrieved, and the LiDAR buoy is secured and prepared for shipping (container or flat rack).

2.8.4.1. Weather and operational parameters

Field visits are subject to a forward five-day weather forecast being obtained and found satisfactory for carrying out the work.

2.9. Timetable for Licence Activities

The LiDAR buoy will be deployed for an indicative period of one to two years, with removal to occur within a maximum of 30 months following deployment (per Table 2-8).

The specific timing of activities is subject to operational windows. The estimated duration and occurrence for each high-level task has been included in Table 2-8. This high-level schedule will support identification of potential interactions between activities to be forecasted. Once the timing of the proposed activities is more granular, simultaneous operations can be confidently assessed.

There are no obligations arising from the self-assessment under the EPBC Act which prevent the operation of the LiDAR buoy within a specific seasonal or ecological window (RPS, 2024c).

The licence activity timetable is detailed in Table 2-8.

Table 2-8 Licence activity timetable

Licence Activity	Task	Task Description	Approximate Duration	Proposed Timeframe (approximate)
Wind resource and metocean monitoring using a LiDAR buoy	1	Deployment	3 to 5 days	Q2 – Q3 2025
	2	Service	~8 days	Reactively, only as required for emergencies (for a deployment lasting up to 15 months) Required once in the deployment (for a deployment lasting up to 30 months), at between 12-15 months after deployment
	3	Recovery	3 to 5 days	1. For a 12-month deployment, between Q1 2026 and at latest Q4 2026 2. For a 24-month deployment, between Q1 2027 and at latest Q1 2028 (i.e., at maximum 30 months after the latest deployment timing)

2.10. Notifications to the regulator regarding the activity

BFE will notify the OIR of the proposed activity prior to the commencement of the licence activity (that is before deployment of the LiDAR buoy). BFE will notify the OIR after the completion of the licence activity (i.e. following recovery).

3. Consultation

3.1. Stakeholder Engagement Strategy

The Gippsland Dawn Stakeholder Engagement Plan (Engagement Plan) outlines BFE's approach to engaging with stakeholders including the fisheries and boating industry as part of the Project. Delivery of the Engagement Plan will be co-ordinated with the delivery of the overarching Gippsland Dawn Communications and Engagement Management Plan.

The Engagement Plan has been developed in accordance with best practice principles and adheres to the values and principles developed by the International Association for Public Participation (IAP2). IAP2 is the internationally recognised organisation for advancing public involvement and participation in government programs and services. In addition, the Engagement Plan aligns with the following guidelines developed for the renewable energy industry in Australia:

- Considerations for Offshore Wind Industry on Community Engagement, Australian Energy Infrastructure Commissioner, Nov 2023
- Community Engagement Guidelines for the Australian Wind Industry, Clean Energy Council, 2018
- First Nations engagement guide for the renewables industry, Clean Energy Council, Feb 2024
- Offshore renewables and interactions with fisheries, Offshore Infrastructure Regulator, 2024
- Offshore Wind Transmission Development and Engagement Roadmap, VicGrid, March 2023

The Engagement Plan provides an overview of the engagement objectives, the current stakeholder environment in Gippsland, stakeholders associated with the LiDAR buoy activity for the Project and their key issues and concerns.

Using this information, the Engagement Plan provides a rational and deliberate approach for engagement with stakeholders who may have an interest in the LiDAR buoy activity as part of the Project. Engagement with stakeholders has already commenced with feedback being used to inform both the management plan and the implementation strategy for the LiDAR activity. Additional engagement activities will continue to inform and seek feedback from key stakeholders and local industry groups who may be impacted by or interested in the Project.

3.1.1. Stakeholder consultation objectives

The overarching objective of the Engagement Plan is to deliver early and authentic engagement with the Gippsland fishing and boating industry and other stakeholders interested in the LiDAR buoy activity through open and respectful dialogue. To do this, BFE will:

- Listen to and implement feedback from stakeholders.
- Undertake proactive engagement and provide valuable opportunities for stakeholders to give feedback.
- Manage risks associated with the deployment, servicing and recovery of the of LiDAR through providing consistent messages to stakeholders, and delivering honest, transparent information about activities, impacts and outcomes.
- Build and maintain strong working relationships with Federal, State and Local governments and agencies, and Traditional Owners.
- Minimise cumulative impacts on the fishing and boating industry from multiple projects engaging at the same time.

3.1.2. Stakeholder Identification and relevant matters

BFE has undertaken a comprehensive process to identify stakeholders who may have an interest in the project's development, including the wind resource and metocean monitoring using a LiDAR buoy. This process included referring to relevant legislation, desktop research, internal workshops, external stakeholder briefings, engagement with other offshore wind developers in the region, a review of active exploration licences, and surveys of the Gippsland Dawn feasibility licence area to identify relevant marine users operating in the area including commercial

fishing operations. It also included knowledge-gathering about potential stakeholders who may be impacted, including the Gippsland fishing and boating community.

Figure 3-1 outlines the process of identifying and engaging with stakeholders who have an interest in the Project's development and proposed LiDAR buoy activities.

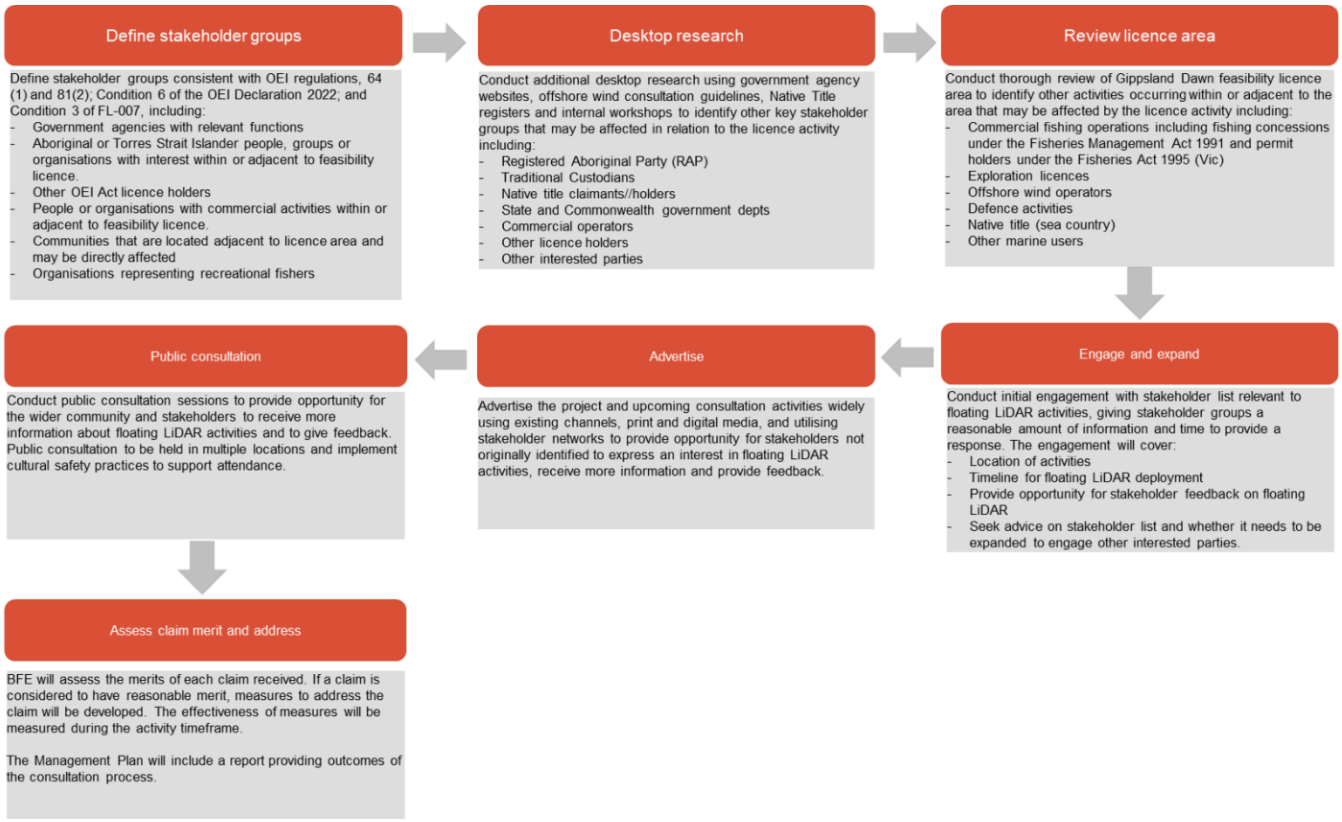

Figure 3-1 Stakeholder Identification and Consultation Process

Through this process, a list of relevant stakeholders was developed. Table 3-1 provides an overview of the key stakeholder and community groups related to the industry in Gippsland, as well as and matters designated as relevant to specific stakeholders. Stakeholders identified through this process are also included in Gippsland Dawn's broader communications and engagement strategy.

Table 3-1 Key stakeholders

Stakeholder	Function, activities, rights and interests	Relevant information provided to allow an informed assessment	Outcome of consultation
Commonwealth and State Departments, Agencies and Authorities			
Department of Agriculture, Fisheries and Forestry (DAFF)	Policy function and associated fisheries management Biosecurity function Engagement with local fishing operators	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No comments received
Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Regulatory compliance function under the EPBC Act Responsible for developing a legal framework for offshore wind. Potential impacts on underwater cultural heritage (UCH) or activities within a UCH zone.	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No follow-up questions/ clarifications

Stakeholder	Function, activities, rights and interests	Relevant information provided to allow an informed assessment	Outcome of consultation
	Managing public consultation and declaring offshore wind areas Hold financial security		
Australian Fisheries Management Authority (AFMA)	Regulatory compliance function for the management of commercial fisheries in Commonwealth waters Engagement with local fishing operators Requirement	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No follow-up questions/ clarifications
Offshore Infrastructure Regulator (OIR)	Regulatory compliance function for licence area and licence activities Responsible for approval of management plan for the activity and ongoing compliance monitoring Safety, environmental management (compliance with EPBC obligations) and infrastructure integrity Provisional form and amount of financial security	Management plan Summary of engagement activities Vessel movements within licence area Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	RFI issued for the management plan submission. Responses developed by BlueFloat Energy and returned to OIR. Evaluation of the proposed management plan has been finalised
Australian Maritime Safety Authority (AMSA)	Regulatory compliance function with regards to maritime safety and protection of the marine environment Safety of all vessels	Vessel movements Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Navigation aids, markings, etc. Project and activity timelines	AMSA requested detailed information on navigation aids and marking. Duly provided by BlueFloat Energy No further follow-up questions / clarifications
Australian Hydrographic Office (AHO)	Part of the Department of Defence Regulatory responsibility under the Navigation Act 2012 – responsible for issue of Notice to Mariners	Vessel movements Location of LiDAR buoy Project and activity timelines	No specific comments Provided information required for drafting a Notice to Mariners prior to deployment
Department of Defence (DoD)	Regulatory role in Defence Exclusion zones Impacts on operations	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	DoD advised that they have no concerns with the deployment of the LIDAR buoy
Bureau of Meteorology (BoM)	Impacts on operations	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No concerns about the LiDAR buoy
Director of National Parks	Potential environment impact on Australian Marine Parks, including cumulative impacts	Location of LiDAR buoy relative to Australian Marine Parks (no overlap) LiDAR buoy activity description, objectives, and risks Project and activity timelines	No concerns about the LiDAR buoy as not in proximity of any Australian Marine Parks
Victorian Fisheries Authority (VFA)	Potential impacts on commercial & recreational fishing industry in Victoria and fisheries management arrangements Commercial fishing licences Exclusion zones Cumulative impacts Commercial viability of industry	Summary of engagement activities with state managed commercial fisheries. Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	The VFA has requested to be kept informed about upcoming activities associated with the Gippsland Dawn project. BFE has committed to maintaining ongoing engagement with the VFA

Stakeholder	Function, activities, rights and interests	Relevant information provided to allow an informed assessment	Outcome of consultation
Department of Transport and Planning (DTP)	Cumulative impacts Job impact/creation	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No follow-up questions/ clarifications
Department of Energy, Environment and Climate Action (DEECA)	Cumulative impacts Environment impacts	Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No follow-up questions/ clarifications.
Aboriginal or Torres Strait Islander People and Organisations			
Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)	Understanding project and benefits Potential impact to sea country and song lines Cumulative impacts Ongoing Traditional Owner participation Native Title holder Opportunities for Indigenous employment Business opportunities Managing social and environmental impacts	Location of LiDAR buoy. Potential impacts of activities on environmental, socio-economic, and cultural values How to provide feedback. Project and activity timelines	No comments received
Kurnai Aboriginal Corporation	Understanding project and benefits Impacts on Sea Country Cumulative impacts Native Title rights Opportunities for Indigenous employment Business opportunities Managing social and environmental impacts		Ongoing consultation following delays in establishing initial engagement. Request for updates as project progresses
Other Licence Holders			
Esso (ExxonMobil)	Ongoing operations Exclusion zones Survey locations and inputs. Potential for on water interactions/ simultaneous operations	Vessel movements Location of LiDAR buoy How to provide feedback Project and activity timelines	The ESSO project team reviewed the floating LIDAR and G&G survey activities and have no major concerns. Requested to be kept in the loop on which vessel is installing, the timing, and whether working from Barry Beach Marine Terminal
Oil and Gas Exploration or Retention Licence holders and Greenhouse Gas Assessment Permit holders (CarbonNet, Hibiscus Energy and GB Energy)			Request for further information on mooring design. Mooring design duly provided by BlueFloat Energy No further comments
Other offshore wind feasibility licence holders	Location of buoy Cumulative impacts		No follow-up questions /clarifications
Commercial Fishing Industry			

Stakeholder	Function, activities, rights and interests	Relevant information provided to allow an informed assessment	Outcome of consultation
South East Trawl Fishing Industry Association (SETFIA)	Exclusion zones Survey locations and inputs. Compensation arrangements Impacts to fishing areas during construction and operation. Access to fishing areas during construction and operation Cumulative impacts Environment impacts	Vessel movements Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines Potential commercial opportunities for members How to provide feedback Potential impacts of activities No exclusion zone sought	Expressed concern for its members about the impact the location of the floating LiDAR buoy would have on commercial operations. Also raised concerns about potential interactions between the buoy and fishing vessels Recommended increased frequency of communications
Southern Shark Industry Alliance (SSIA)			
Seafood Industry Victoria (SIV)			Expressed desire to keep members informed about the project and upcoming activities. BFE has committed to ongoing engagement with SIV and will send information via SIV's database of commercial fishing operators
Lakes Entrance Fishermen's Co-Operative (LEFCOL)			Received feedback on LiDAR buoy location, how this is communicated to operators, potential impact on commercial fishing operations
Recreational Fishing Industry			
Victorian Recreational Fish Peak Body	Impacts on recreational fishing industry. Cumulative impacts Environment impacts Exclusion zones Impacts on tourism	Vessel movements Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks How to provide feedback Project and activity timelines No exclusion zone sought	VR Fish has requested to be kept informed about upcoming activities associated with the Gippsland Dawn project. No comments related to the floating LiDAR buoy
Community (incl. local, state, and federal elected representation)			
East Gippsland community (including but not limited to Lakes Entrance, Metung, Paynesville, Loch Sport, Golden Beach, Seaspray)	Jobs and opportunities Cumulative impacts Environment impacts	Project information Location of LiDAR buoy Project and activity timelines How to provide feedback.	No follow-up questions/ clarifications.
Federal Member for Gippsland (Darren Chester MP)	Federal representative for local community Engagement with local fishing operators Exclusion zones Cumulative impacts Environment impacts	Summary of engagement activities Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	Expressed the importance of the fishing industry and desire to minimise disturbances/impacts to fishing in the area. No subsequent follow-up questions/ clarifications
State Member for Gippsland South (Danny O'Brien MP)	State representative for local community. Impact on local fishing and boating industries. Cumulative impacts Job impact/creation	Summary of engagement activities Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	No comments received.
State Member for Gippsland East (Tim Bull MP)	State representative for local community.	Summary of engagement activities Location of LiDAR buoy	No further follow-up questions/clarifications.

Stakeholder	Function, activities, rights and interests	Relevant information provided to allow an informed assessment	Outcome of consultation
	Impact on local fishing and boating industries. Cumulative impacts Job impact/creation EES process	LiDAR buoy activity description, objectives, and risks Project and activity timelines	Requested regular updates on activities
East Gippsland Shire Council	Use of ports and impact on shipping channels	Summary of engagement activities Location of LiDAR buoy LiDAR buoy activity description, objectives, and risks Project and activity timelines	Requested to be engaged early in relation to future survey activities. No follow-up questions /clarifications on the LiDAR buoy

3.1.3. Stakeholder consultation methods and timing

The high-level engagement approach for stakeholders is outlined in Table 3-2 and detailed list of activities is found in Table 3-3.

Table 3-2 High-level engagement approach

Phase	Phase 1: Initial engagement	Phase 2: Deployment	Phase 3: Ongoing engagement
Approximate Timing	July – December 2024	February 2025 – May 2025	June 2025 – December 2026
Stakeholder engagement methods	One-on-one discussions/briefings Newsletters External presentations and webinars Project e-mail Works notifications/factsheets Newsletters Website FAQs Information sessions and drop-ins	One-on-one discussions/briefings External presentations and webinars Project e-mail Works notifications/factsheets Information sessions and drop-ins Website Newsletters Print (local newspapers) Radio (local radio) Notice to Mariners Radio systems Text and e-mail services	One-on-one discussions/briefings External presentations and webinars Project e-mail Website Newsletters

Table 3-3 Engagement activities 2024/25

Timing	Activity	Details	Desired outcome
Sep/Oct 2024	Stakeholder/industry briefings	For circumstances where BFE does not have an existing relationship with key stakeholder. Provide opportunity to receive a briefing from BFE about current project status for the project and upcoming LiDAR buoy activity.	Stakeholders aware of project and survey timelines
Sep/Oct 2024	Meetings	Where BFE does have existing relationship with key stakeholders, organise a time to discuss the project and upcoming LiDAR buoy requirements for the project.	Stakeholders aware of project and survey timelines
Oct/Nov 2024	Maritime users survey	Conduct survey or feasibility area to determine maritime stakeholders	Detailed understanding of stakeholders potentially impacted by LiDAR buoy activity
Nov 2024	Meetings	In-person meetings with key stakeholders including SETFIA and the Lakes Entrance Fishing Co-Operative to discuss upcoming LiDAR buoy activities.	
Nov 2024	Drop-in sessions	Drop-in sessions held in Seaspray, Traralgon, Lakes Entrance, Bairnsdale, Metung and Paynesville to raise awareness of the Project and discuss upcoming works including LiDAR buoy activity.	Raise awareness of the Project and upcoming activities.
Nov 2024	E-mail updates	BFE to provide update to stakeholders on the project including upcoming works ahead of the LiDAR buoy activity. E-updates should be provided to all stakeholders and update as relevant project milestones are achieved.	Build awareness of Gippsland Dawn and LiDAR buoy. Communicate key timelines to stakeholders including upcoming survey schedule

Timing	Activity	Details	Desired outcome
6-weeks prior to deployment	Meetings	Provide update on the project and upcoming LiDAR buoy requirements for the Project.	Build awareness of LiDAR buoy requirements and timelines for activities
6-weeks prior to deployment	Social media	Promotion of upcoming webinars and pop-up sessions using existing social media channels and the Project website.	Raise awareness of upcoming engagement opportunities.
4-weeks prior to deployment	Drop-in sessions	Drop-in session to raise profile of the project and share information about upcoming surveys. To be held at venues likely to attract high levels of fishing and boating stakeholders.	Communicate upcoming project activities for the project
2-weeks prior to deployment	E-update	Provide project update about upcoming surveys including LiDAR buoy activity.	Supply update for upcoming project activities
2-weeks prior to deployment	E-mail /SMS update	Utilise existing stakeholder channels to share message about upcoming LiDAR buoy activity.	Use all available channels to share message of upcoming surveys.
2-weeks prior to deployment	Media and social media campaign	Target media channels to provide update about upcoming surveys associated with the project. Look for opportunities to have spokespeople appear on the show to discuss BFE's position and international experience in relation to fishing.	Raise awareness of Gippsland Dawn and upcoming LiDAR buoy activity
2-weeks prior to deployment	Meetings and face-to-face engagement	Additional meetings as required with key stakeholders prior to deployment	Opportunity for stakeholders to ask any final questions prior to the deployment of the LiDAR buoy
Week of deployment	E-mail SMS update	Utilise existing stakeholder channels to share message about upcoming LiDAR buoy activity.	Use all available channels to share message of upcoming surveys.
2-weeks post deployment	Meetings	Provide update on the project and receive initial feedback on LiDAR buoy activity.	Build awareness of LiDAR buoy requirements and timelines for activity
Every 3-months	E-mail update	Provide regular updates as to Gippsland Dawn status.	Supply update for current and upcoming activities
As required	Webinars	To be used as required	Share information about upcoming project surveys and key milestones
As required	Pop-up sessions	To be used as required	Share information to maritime users about project works and key milestones

3.1.4. Effective consultation

BFE has used the IAP2 spectrum to determine the level of engagement required. The level of engagement may vary depending on the stakeholder, level of anticipated impact, timeframes for delivery and other activities operating concurrently. The IAP2 spectrum of public participation assists with decisions about how to work with project stakeholders. The spectrum moves from left to right – with a progressively increasing level of public participation and involvement.

Table 3-4 describes how the communications and engagement approach for Gippsland Dawn aligns with the IAP2 spectrum.

Table 3-4 Engagement approach using the IAP2 spectrum.

Inform	Consult	Involve	Collaborate	Empower
Provide balanced and objective information to assist understanding of	Obtain feedback on analysis, alternatives and decisions	Work directly with stakeholders to ensure their aspirations are understood and considered	Partner with stakeholders in each aspect of the decision including development of	Place final decision-making in the hands of stakeholder

the problem, opportunities and solutions			alternatives and identification of the preferred solution	
What this means for Gippsland Dawn				
Community and stakeholders will be informed of upcoming works associated with the Project. Community and stakeholders will be informed about non-negotiable elements, clearly explaining why these elements are set.	Community and stakeholder feedback will be sought to inform the negotiables elements of the Project. Stakeholders will be updated about how their feedback has been considered in the Project's development.	Testing ideas and options with stakeholders and working together on a solution to co-exist in the offshore/marine environment. Stakeholders will be invited to provide feedback on location of LiDAR buoy.	Collaboration would happen with key stakeholders to identify solutions for some key aspects of the deployment, servicing and recovery of the LiDAR buoy.	Applies to project team and government decision makers

3.1.4.1. Sufficient information

To ensure stakeholders have access to timely, relevant and clear information regarding the LiDAR buoy activity, BFE will determine the appropriate communication tool or tools to use based on the target audience, level of information to share, timeframes and expected level of stakeholder interest (Table 3-5).

Table 3-5 Communication and engagement tools.

Communication and engagement method	Tool	Description and purpose
Publications	Newsletters	Newsletters will be used to inform stakeholders and the community about the Project and provide a look ahead of proposed work activities, operating hours and any other potential impacts and mitigation measures. Distributed via the Project email distribution list and targeted letterbox area. Information will also be uploaded onto the Gippsland Dawn website. Links to translated materials and the contact details of an appropriate translation service will be published on all key communication materials.
	Works notifications	A reader-friendly document to explain upcoming work, potential impacts or address a particular issue with specifically targeted residents or stakeholders. Issued to stakeholders either by email, letterbox or face-to-face, depending on their preferred method of receiving information.
	Notice to Mariners	Prior to deployment of the LiDAR buoy BFE will send official notification via a Notice to Mariners to provide advice to marine users on aids to navigation.
	FAQs	Project approved responses to frequently asked questions.
Face to face engagement/consultation	One-on-one discussions/briefings	One-on-one meetings with MPs, residents, businesses or organisations to address specific concerns and discuss specific issues.
	Information sessions and drop-ins	An event held in the local communities of the Project area for stakeholders to come and talk to the Project team. These events may also include activities such as BBQs or coffees to thank people for taking the time to visit the team.
	External presentations and webinars	Presentations to stakeholder groups. Can vary widely from gathering feedback to speaking at conferences and industry events.
Key contact points	1800 project number	A dedicated 1800 number will be used, and the number printed on all external and internal communications, encouraging community members to call should they have any enquiries. The number will be operational during work hours, including night work if required.
	Website	Printed on all external and internal communications, encouraging community members to visit with Gippsland Dawn website for more information.
	Project email	Printed on all external and internal communications, encouraging community members to email should they have any enquiries.
Online	Website	Printed on all external and internal communications, encouraging community members to visit the website for more information about the Project.

Communication and engagement method	Tool	Description and purpose
Advertising and Media	Print (local newspapers)	Print media will be used to communicate upcoming events and milestones associated with Gippsland Dawn. It will also be used to advertise engagement activities and events being hosted.
	Radio (local radio)	Radio advertising will be used to communicate upcoming events and milestones associated with Gippsland Dawn. It will also be used to advertise engagement activities and events being hosted.

3.1.4.2. Sufficient time

The following works notifications will be used to ensure stakeholders have access to timely, relevant and clear information regarding the LiDAR buoy activity (Table 3-6).

Table 3-6 Works notifications.

Type of works	Type of notification	1st Notice	2nd Notice	3rd Notice
Impacts to the port or fishing/boating operations	SMS & Notice to Mariners Radio channel notifications E-mails Website Meetings with likely affected stakeholders Social media Advertising	4 weeks	2 weeks	3 business days
Offshore (marine) work	Website Advertising Social media Calls/meetings with highly impacted stakeholders and groups Liaise with/meeting with relevant authorities.	4 weeks	2 weeks	1 week

3.1.4.3. Management of change

BFE will conduct quarterly reviews of the Engagement Strategy to ensure the information captured remains relevant and accurate. Changes to the Engagement Strategy will be managed by the Stakeholder and Engagement Manager.

In the event of a change of situation to the deployment, servicing and recovery of the LiDAR buoy, BFE will share this information through relevant channels with stakeholders as soon as reasonably possible. This includes but not limited to changes in timelines for the deployment.

3.1.4.4. Complaints

All complainants will be treated with fairness and respect. BFE are also entitled to be treated with the same level of fairness and respect. It is a priority for the Project to:

- Protect the health and safety of staff, complainants and others
- Ensure fairness in the complaints process
- Improve efficiency and commitment to the complaints process.

BFE adopts the Victorian Ombudsman's approach to handling complaints and managing unreasonable complainant conduct.

BFE will demonstrate its commitment to good complaint handling by:

- Acknowledging complaints quickly

- Addressing complaints promptly
- Providing information about how and where to contact the Project and ensuring this contact information is accessible and free to everyone
- Ensuring there is no detriment to people who make a complaint
- Monitoring issues and complaints regularly and identifying opportunities for improvement.

BFE staff who are involved in communication and engagement activities will be formally trained in the Victorian Ombudsman's process for managing unreasonable conduct by complainants.

Project email

Project enquiries and complaints may be lodged by email or phone. An email address has been established to direct enquiries relating to the Project. This email address is info@gippslanddawn.com.au. The project contact number is +41(0) 433 040 571.

Enquiries management and response times

Enquiries will be acknowledged and closed out within the timeframes outlined in Table 3-7.

Table 3-7 Enquiry response times.

Channel type	Enquiry time acknowledgement time (business days)	Enquiry close out time (business days)
Email	One day	Three days
Website	Two days	Three days
In-person/social media	ASAP or one day	Two days
Written correspondence	Two days	Five days

Complaints management and response times

A complaint should be acknowledged as soon as reasonably practicable and within the acknowledgement response times outlined in Table 3-8.

Table 3-8 Complaint response times.

Category	Acknowledgment	Response	Resolution
Complaints during business hours	24 hours	Same day, if possible, if not up to 3 days.	All issues should be responded to and acknowledged within the periods detailed in the adjoining column. The resolution and closure of the issue will be dependent on the complexity of the issue. For complex complaints, updates on progress and investigation should be provided to the complainant every two days, or as mutually agreed with complainant.
Complaints – email and written	24 hours	Same day, if possible, if not up to 2 days.	
Complaints – social media and web	24 hours	Same day, if possible, if not up to 2 days.	

3.1.5. Summary of stakeholder feedback received

BFE is committed to working with stakeholders to understand potential concerns and issues associated with the Project.

Throughout November and December 2024, BFE has conducted targeted and open engagement sessions in the Gippsland region. A summary of engagement activities is provided in Table 3-9.

Table 3-9 Stakeholder Engagement sessions summary.

Date	Location	Objective	Stakeholder group	No. of attendees
Oct / Nov	Online	Targeted engagement with relevant government departments and authorities to discuss upcoming LiDAR buoy activity.	Government departments and other relevant agencies	N/A
8 Nov 2024	Seaspray	Community engagement sessions with ten other offshore wind developers to introduce the industry and answer questions.	Seaspray community	75
14 Nov 2024	Traralgon	Community engagement sessions with ten other offshore wind developers to introduce the industry and answer questions.	Traralgon community	60
15 Nov 2024	Lakes Entrance	Targeted engagement session with the Lakes Entrance Fishing Co-Operative Board to explain the upcoming LiDAR buoy activity and listen to concerns and feedback.	Lakes Entrance Fishing Co-Operative	7
25 Nov 2024	Bairnsdale	Joint community drop-in session with Navigator North Offshore Wind Project to introduce projects and answer any questions.	Bairnsdale community	20
25 Nov 2024	Paynesville	Joint community drop-in session with Navigator North Offshore Wind Project to introduce projects and answer any questions.	Paynesville community	5
25 Nov 2024	Lakes Entrance	Open meeting hosted by the Lakes Entrance Fishing Co-Operative to meet with commercial fishing operators and discuss the upcoming LiDAR buoy activity.	Lakes Entrance Fishing Co-Operative	10
26 Nov 2024	Lakes Entrance	Joint community drop-in session with Navigator North Offshore Wind Project to introduce projects and answer any questions.	Lakes Entrance community and local commercial fishers	30
26 Nov 2024	Bairnsdale	Industry networking session hosted by Committee for Gippsland to enable local businesses the opportunity to connect with the Gippsland Dawn project team and discuss upcoming works and relevant timelines.	Committee for Gippsland Industry Networking Event	30
27 Nov 2024	Metung	Joint community drop-in session with Navigator North Offshore Wind Project to introduce projects and answer any questions.	Metung community	30
3 Dec 2024	Online Webinar	To provide a forum for stakeholders to engage with the Project who may have been unable to attend an in-person session	General	22
			Total	469

Through engagement to date, BFE has received feedback from stakeholders relating to the LiDAR buoy activity and have analysed and assessed the feedback received and used the information gathered to help inform the Project (Table 3-10).

The detailed consultation report can be found in Appendix A.

Table 3-10 Stakeholder feedback.

Theme	Feedback received	How feedback was assessed
Location of LiDAR buoy	BFE received feedback on the proposed location of the LiDAR buoy. Stakeholders suggested alternative locations to consider which would reduce impact on commercial fishing operations.	BFE reviewed alternative locations and advised stakeholders that the alternative locations were not suitable as they would require additional LiDAR buoys to be deployed to collect sufficient data.
Communication	To update coordinates listed on the Project factsheet to be compatible with fishing vessel navigation units.	Upon receiving request, BFE has updated its Gippsland Dawn website and all collateral to ensure the coordinates are understood by all stakeholders.
Map of offshore wind activities	Fishing stakeholders requested a map to be developed detailing the collective activities of the offshore wind industry off the coast of Gippsland.	BFE has undertaken to work with other developers to develop a map with navigational reference points to share with key stakeholders.
Compensation for affected commercial operations	Stakeholders expressed concern their business may be impacted from the introduction of a LiDAR buoy and requested compensation.	BFE is committed to working with all stakeholders to minimise any potential impacts. If a stakeholder can demonstrate they have been adversely impacted by Project activity, the Project team will work with the stakeholder directly to determine appropriate compensation.
Insurance	Stakeholders have raised questions about the insurance of the LiDAR buoy in case it is damaged during its operation.	In response to questions about insurance of the LiDAR buoy, BFE has informed stakeholders that it is the responsibility of its contractor to ensure the buoy has adequate levels of insurance in case of damages caused through its deployment.
Cumulative impacts	During meetings with the commercial fishing industry the issue of cumulative impacts on the industry was raised. Stakeholders are concerned that the impact of offshore wind developments will compound impacts already experienced through reduced catch quotas and increases to marine parks.	BFE is working with other offshore wind developers in Gippsland to ensure that impacts on commercial fishing operations are minimised. BFE understands the pressure recent changes have had and is committed to working with the commercial fishing industry to ensure we can co-exist.

3.1.6. Ongoing consultation

Table 3-2, Table 3-3 and Table 3-4 within Section 3.1.4 outline the planned ongoing consultation and engagement activities for this Project. BFE will continue to evaluate the effectiveness of its consultation with stakeholders to ensure it responds to their requirements.

3.1.7. Publication

The GDOWP Stakeholder Engagement Strategy, excluding any commercially sensitive, confidential or personal information, will be published on the Gippsland Dawn website before the end of 30 days following the management plan approval; until such time as the licence ceases to be in force, or the licence holder ceases to hold the licence.

Any changes to the Stakeholder Engagement Strategy will be reflected in the published document through periodic updates on no less than on a quarterly basis.

4. Management system

4.1. Management system framework

The BFE Management System has been developed to provide a systemic framework that:

- Outlines the commitment by BFE leadership and employees.
- Ensures compliance with legal obligations
- Identifies and manages health, safety, environment and quality risks.
- Identifies best practice approaches to project delivery to drive successful project outcomes.
- Fosters continual improvement.

4.2. BFE roles and responsibilities

Project roles and responsibilities for BFE personnel, BFE representatives, personnel and contractors are clearly defined to ensure effective risk and HSEQ management throughout the licence activities. The BFE CEO holds ultimate responsibility for health, safety, and environmental performance. The Head of HSEQ oversees compliance, maintains risk assessment processes, coordinates corporate risk registers, and supports projects through audits and documentation management. The Project Director is accountable for implementing risk management and the project's management system. Technical Project Managers ensure project-level HSEQ compliance and are responsible for OIR notifications during offshore activities. All personnel and contractors must engage in risk assessment and apply relevant controls within their scope of work.

4.2.1. Contractor selection

Prequalification and selection of contractors is conducted using a risk approach and assessment based on a contractor's ability to deliver a product, equipment or service in a safe, healthy and environmentally acceptable manner. BFE will only engage a contractor once they have been prequalified and approved.

BFE will monitor contractor performance via scheduled audits and reviews.

4.2.2. LiDAR buoy provider

BFE has engaged a LiDAR buoy provider. The LiDAR buoy provider is responsible for implementing its own management system and for ensuring compliance with all contractual, regulatory, and project-specific requirements as defined in the management plan. The LiDAR buoy provider is responsible for ensuring its personnel are trained, competent, and informed of their roles under the management plan. Coordination and communication between BFE and the LiDAR buoy provider are maintained through designated representatives and structured planning and review processes.

The Project Director will be accountable for overall project delivery, contractor compliance and review of all incidents. The assigned Project Manager will oversee safe execution, risk management, coordination, and compliance. The Field Party Chief will lead on-site deployment, HAZID facilitation, and coordination with BFE and vessel operators. A Field Team will execute work in line with BFE and provider safety systems, including reporting obligations. The HSSEQ Advisor will ensure HSSEQ compliance, monitors safety performance, and reports incidents. Finally, the Data Processing Manager will be responsible for data quality, reporting accuracy, and adherence to technical and HSSEQ standards.

4.2.3. Vessel contractor

The vessel contractor has not yet been appointed. Key vessel roles and responsibilities have been defined to ensure clarity of expectations and alignment with safety and compliance obligations under the management plan. With respect to the vessel operations within the licence area, the Vessel Master will be responsible for safe vessel operations, emergency coordination, crew competence, and reporting incidents or hazards to the LiDAR buoy provider Party Chief. The vessel crew will report to the Vessel Master and are responsible for safe operations, HAZID participation, incident reporting, and adherence to all HSE requirements.

The LiDAR buoy provider will liaise with BFE on the selection of an appropriate vessel contractor during the planning of all work.

4.2.4. Lifting Contractor

The LiDAR buoy provider will liaise with BFE on the selection of an appropriate lifting contractor to mobilise the LiDAR buoy from the port into the water, during the planning of all work.

4.2.5. Fitness for Work

BFE requires all workers to be fit and healthy prior to mobilisation and deployment and be declared fit to work prior to executing any work on behalf of BFE. Any illness, injury, or inability to safely perform tasks must be reported to the LiDAR buoy provider Party Chief. The Party Chief will liaise with the Project Manager and BFE representatives to address resourcing or health issues before or during offshore operations.

4.2.6. Medical requirements

All workers required to conduct site works or access site works offshore must obtain a valid medical certificate that declares they are fit to work prior to mobilisation. The certificate should be in accordance with the Australian Maritime Safety Authority domestic seafarer medical, or Offshore Energy UK requirements or equivalent. The LiDAR buoy provider Party Chief will collect medical certificates on behalf of provider and vessel workers for submission to BFE. Medical certificates will be reviewed by BFE WHS representatives prior to mobilisation to site.

Workers that are working on a vessel for a day trip or assisting with pre-mobilisation activities at the port will not be required to undertake a medical as above, however should be fit for the work they are undertaking.

4.2.7. Drugs and Alcohol

BFE has a zero tolerance for alcohol and drugs in the workplace, including during all offshore activities.

All workers have the responsibility to ensure the use of drugs and alcohol does not pose a risk to the health and safety of themselves or others in the workplace and to present themselves fit for work.

4.2.8. Fatigue

BFE is committed to ensuring fatigue risks associated with remote works and operational requirements on vessels for the LiDAR buoy activity are managed appropriately.

BFE, the LiDAR buoy provider, and the vessel contractor have a responsibility to manage fatigue to ensure that it does not pose a risk to the health and safety of themselves or others in the workplace. Fatigue hazards and risks will be assessed at the planning stage and then monitored by the LiDAR buoy provider Party Chief and Vessel Master throughout the work to manage fatigue.

The LiDAR buoy provider will notify BFE of any issues relating to fatigue and resourcing.

4.3. Coordination of Operations, Consultation and Communication

BFE Management System outlines the methodology to ensure appropriate interfacing between BFE, the LiDAR buoy provider and vessel contractor during the licence activity. Open communication and consultation are promoted though the organisation and the wider project team, including all contractors. This process includes the communication and provision of information to all workers, as well as a mechanism for internal and external feedback.

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

BFE will work with the LiDAR buoy provider and the vessel contractor to facilitate formation of Health and Safety Committees or appointment of Health and Safety Representatives if requested during the activity.

BFE also encourages workers to raise safety observations through an online application form by scanning a QR code which will be actioned as necessary.

Workers also have the right to cease work. In this circumstance, communication and consultation for all workers involved in the works shall occur to rectify the situation and ensure the works can be carried out safely for all of those involved.

4.4. Qualifications, training, competencies and supervision

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

Training requirements shall be identified based upon:

- HSE competency required as defined by BFE and contractors
- Specific training for personnel to eliminate or control hazards to which they are exposed while completing their roles and responsibilities
- Legislative requirements
- Employee development needs.

No workers will be permitted to perform work they are not trained for. Task-specific training (e.g. lifting, vessel operations, high-risk work) is required for specialised roles.

Contractors must provide valid training and competency records to BFE prior to mobilisation. Required certifications include, but are not limited to: STCW, first aid, emergency response, sea survival, and relevant medical certificates.

Induction processes are in place for all personnel, covering general, contractor, project-specific, and vessel-specific requirements.

Supervision requirements are risk-based, with adequate supervision ensured through contractor engagement. For the LiDAR buoy activity, the LiDAR buoy provider Party Chief will supervise LiDAR buoy provider workers; the Vessel Master will supervise vessel crew.

4.5. Hazard and risk management

BFE is committed to ensuring all hazards and risks associated with the licence activities are eliminated or controlled as low as reasonably practical (ALARP). The BFE Management System includes requirements for health, safety and environmental risk management, which are outlined below.

BFE follows the following principles of risk management:

- Identify the hazards
- Assess associated risks
- Identify controls to eliminate or mitigate risks to ALARP
- Plan for recovery should controls fail.

A systematic approach is employed to help determine the likelihood and potential consequences of a hazard becoming an event that provides necessary information to allow for the ranking of the risk and management.

A 3-level approach to risk management is sued:

- Level 1 (HAZID Workshop): Conducted pre-mobilisation, with key stakeholders, to capture risks and mitigation measures. The LiDAR HAZID has already been completed.
- Level 2 (Worksite HAZID): Conducted on site with operational personnel to refine and update the Level 1 assessment.
- Level 3 (Toolbox Talk): Conducted prior to each operation to address site- and time-specific risks and ensure operational readiness.

Residual risk is characterised as:

- High Residual Risk (Red Zone): The operation phase cannot be executed, and further engineering/ prevention measures are required to perform the operation. A new risk assessment shall be performed.

- Medium Residual Risk (Yellow) zone: The risk is still medium; operation can be performed with extra care and all mitigation measures in place. Prior the work personnel will be involved in identifying potential additional mitigation measures.
- Low residual Risk (Green zone): Operation can be performed providing mitigation measures are in place.

Control measures will follow the hierarchy of controls principles where mitigation measures focus on reduction of probability of occurrence rather than severity.

Review of risk assessments will be completed as part of the daily toolbox where planning of works is discussed with all workers prior to work commencing each day.

4.6. Incidents

BFE Management System documents requirements for the management of all incidents and events.

In the case of an incident or event, BFE use a severity scale) as guidance to assess the impact of the incident/event.

4.6.1. Initial incident response

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

The BFE Emergency Response Plan describes the response to a variety of emergency response scenarios.

4.6.2. Incident communication protocols

BFE has developed an Event Notification Flowchart, based on the severity of the incident. The OIR and WorkSafe Victoria will be notified immediately after becoming aware of a notifiable incident which has arisen from the conduct of the operation.

The following notification protocols apply:

- Event with level 4 or 5 shall be reported immediately to BFE Head of HSEQ and line management, using appropriate communication measures.
- Event with level 2 or more shall be notified to BFE Head of HSEQ and line management within 24 hours.
- Event with a severity of 1 shall be dealt with at project level and shall form party of monthly HSEQ reporting.

Notifiable incidents should be reported to BFE immediately to ensure reporting requirements are met. High Potential Event – A High Potential Event (HIPO) shall be reported as soon as possible and within 24 hours of occurrence to the BFE Project Manager.

BFE is committed to ensuring ill or injured workers can return to work as soon as possible. All BFE contractors will follow a similar process to ensure an injured or ill worker can be managed back into normal work duties.

Where a notifiable incident has occurred, work should cease, and the scene preserved (if safe to do so) until the regulator(s) investigate or advise otherwise. BFE requires an incident to be investigated when the Severity level 3 or higher, or the incident is deemed a HIPO (High Potential Event) or any other event as instructed by BFE.

In the event an investigation report is to be prepared for BFE, it will include details of the event, causal factors, root causes identified and corrective and preventive actions. BFE expects investigations to be submitted within 7 days after the occurrence. Where more time may be required a preliminary investigation shall be submitted.

4.7. Reporting and Notifications

All contractor health and safety reporting will be part of BFE monthly and annual reporting processes.

The LiDAR buoy provider will report to BFE relevant daily information during licence activities.

All incident notifications follow the BFE Event Notification Flowchart, and any notifiable incidents are reported to the regulator. Activity pre-commencement and post-completion notification will also be provided to the OIR under the OEI Amendment Regulations.

4.8. Record keeping

Records will be securely stored in digital (e.g. SharePoint) and/or hard copy format at BFE's Australian office (11 Wilson Street, South Yarra, 3141 VIC). Both formats will be protected against unauthorised access and will be easily retrievable when required.

Records will be retained for at least seven years after creation or modification, with both original and updated versions preserved where applicable and will be made available to auditors in accordance with relevant regulatory requirements.

BFE will continue to meet all record-keeping obligations in the event of licence transfer or expiry.

4.9. Monitoring, Assurance and Audit

4.9.1. Internal audits

BFE conducts internal audits of the Management System and projects at set intervals and in accordance with the annual internal audit schedule. Internal audits are conducted utilising pre-prepared audit checklists incorporating legal requirements, ISO 45001 requirements and BFE best practice approaches to health and safety management.

4.9.2. Health and safety observations

All workers can submit safety observations to the LiDAR buoy provider Party Chief, who will document and submit to BFE. Observations can be discussed during the daily toolbox and pre-start meetings, and/or during project and operational meetings.

4.9.3. Inspections

Inspections can be conducted during pre-mobilisation activities at the port, or on the vessel during operational works. The LiDAR buoy provider and the vessel contractor must have their own inspection process in place and provide written reports of all inspections completed to BFE. Inspection reports should identify any non-conformances or issues, along with proposed corrective actions.

4.9.4. Health and safety meetings

The LiDAR buoy provider will facilitate health and safety as an agenda item, which may be included as part of another project meeting. Representatives from BFE, the LiDAR buoy provider, and the vessel contractor (where practical) should be in attendance.

4.9.5. Event reviews

Incidents, hazards and near misses should be reviewed by management representatives from BFE, the LiDAR buoy provider and the vessel contractor to identify any potential non-compliance. Investigations should identify corrective actions, which should be implemented as soon as practicable.

4.9.6. Communication and consultation

Communication and consultation activities can also identify potential compliance issues. Any issues identified via these activities will be addressed by BFE, the LiDAR buoy provider or the vessel contractor, dependent on the issue and who is responsible for corrective actions.

4.10. Non-compliance / Non-conformance

Non-conformances, observations and improvements identified by BFE, the LiDAR buoy provider, or the vessel contractor are to be reported to BFE and recorded in the Non-Conformity Register. The Non-Conformity Register will be reviewed at monthly meetings to ensure non-conformance corrective actions are tracked and closed out. All actions identified and agreed to will be based on the hierarchy of controls assessment and will be tracked to completion.

4.11. Management of Change

Management of Change is included in the BFE Management System. The change process includes communication and consultation with relevant parties, notification to BFE and contractors of the proposed change, documenting the change through the change management process and forms and finally seeking approval for the change.

Changes to health and safety hazards and risks during mobilisation activities or while offshore can be identified at any time and should be managed immediately, including potentially triggering a revision of the management plan.

All workers should be consulted and informed of the change prior to work recommencing.

4.12. Continuous improvement

Continual improvement of BFE's Management System and the management plan is achieved through monitoring, review, assurance, inspection, audit and change management activities. BFE will use the lessons learnt from the LiDAR buoy activity to inform revisions of the management plan for future phases of the Project.

5. Conditions of Feasibility Licence under the OEI Act

A feasibility licence authorises the licence holder to assess the feasibility of a proposed project for up to seven years. Feasibility licences are only available for use in a declared area and are needed before applying for a commercial licence.

GDOWP was granted FL-007 for the Project on 15 July 2024.

The conditions of the licence pertinent to the management plan are:

- Condition 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 the date of this notice)
- Condition 4 – The following people must comply with the management plan for the licence, if there is one:
    - The licence holder;
    - Any other person carrying out activities under the OEI Act or the licence on behalf of the licence holder.

6. Obligations under the EPBC Act

An EPBC Act obligation includes any obligation under conditions attached to an approval or conditions of a permit issued under the EPBC Act.

Under the OEI Act, the management plan must address EPBC Act obligations related to the activities to be carried out under the licence and licence activities.

A self-assessment under the EPBC Act of the activity has determined that no significant impacts to MNES or key environmental features within the licence area are likely to occur associated with the LiDAR buoy activities.

The self-assessment process included consideration of standard management measures required under Part 9(B) of the EPBC Act. Hence, though several measures to avoid and mitigate effects will be implemented in accordance with the relevant conventions, guidelines and standards for good practice, only one obligation under the EPBC Act was identified (Table 6-1).

Table 6-1 Summary of EPBC Act obligations

Impact	Potentially impacted component or features	Measures to avoid, reduce or mitigate impacts
Potential for collision with vessels (Boat strike)	Marine Mammals	**Mitigation:** Compliance with EPBC Regulations 2000 Part 8, Division 8.1, including: Taking action to avoid approaching or drifting closer than 50 m to a dolphin or 100 m to a whale. Not exceeding a speed of six knots within the caution zone of a cetacean (300 m)

6.1.1. Interface with other consent documentation

6.1.1.1. Design notification under the OEI Act Regulations

A design notification is not required under the OEI Act regulations as the proposed activity is not being carried out under a transmission and infrastructure licence or a proposed commercial licence.

6.1.1.2. Commonwealth approvals

The feasibility licence allows for the feasibility studies to be undertaken within the licence area.

The EPBC Act self-assessment of the activity determined that a referral under the EPBC Act was not required and no subsequent sensitivities triggering Commonwealth approval were identified during this assessment.

No additional Commonwealth approvals are required.

6.1.1.3. State approvals

The proposed activity is to be carried out within Commonwealth Waters and subsequently no approvals are required under the State jurisdiction.

7. Emergency Response Management

BFE has developed an Emergency Response Plan (ERP) that provides a definitive course of action to manage potential emergencies associated with the licence activity within the licence area. This plan forms part of the broader management system developed by BFE.

7.1. Identification of Emergencies and Potential Emergencies

There are a number of emergency situations that could arise during the LiDAR buoy activities, summarised below:

- Illness/injury
- Man overboard
- Fire
- Adverse weather conditions/sea conditions including heavy weather, lightning
- Abandon ship
- Vessel grounding or collision
- Spill / chemical pollution
- Vessel breakdown / engine failure
- Drifting buoy
- Animal strike.

These risks have been assessed as low likelihood due to the nature of the activity uncrewed, remotely monitored, and low intervention but warrant preparedness due to the potential for environmental or safety consequences.

A Project Risk Register has been developed and finalised. This risk register contains identified risks and the mitigation measures to reduce the likelihood of occurrence of the identified scenarios down to a level considered as low as reasonably practicable.

7.2. Emergency Response Planning

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

The risk register identifies all foreseeable hazards and risks that would warrant emergency response and includes prevention measures and controls to mitigate likelihood for each emergency situation.

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

- Attend to injured personnel
- Initiate emergency response
- Contact relevant people through notification protocols

7.3. Emergency Response Capabilities, Roles and Responsibilities

During operations, the Vessel Master has ultimate authority and responsibility for the safety of the vessel, crew, and passengers. The designated first aider will coordinate with the Vessel Master to determine appropriate response for any injury or illness.

The LiDAR buoy provider and vessel contractor emergency response plans will include detailed information on roles, responsibilities and response workflows for each emergency scenario.

7.4. Emergency Response Capabilities

BlueFloat Energy will ensure that the following capabilities are ensured by the Vessel:

- First aid response and stabilisation in case of personal injury or illness,
- Oil spill response kit,
- Lifesaving appliances as per regulations,
- Distress means,
- Man overboard recovery kit.

The floating LiDAR buoy provider shall ensure an early and electronic loss of position signalling system, in order to provide an alert when the buoy is drifting.

The floating LiDAR buoy provider and Vessel shall both hold an emergency response plan detailing arrangements for notification and shall detail response to main emergency scenarios.

7.5. Emergency Response Notifications and Communication

The LiDAR buoy provider and vessel contractor ERPs contain detailed information and flowcharts for immediate notification, communication, escalation and response coordination of emergency scenarios on board the vessel. More broadly, emergency response notifications and communication will follow the same protocol as outlined in Section 7.7.

7.6. Emergency response training

Emergency response training requirements include first aid, STCW95 and BOSIET.

- All workers will be provided with emergency response information and plans during the project induction.
- Emergency response plans, flowcharts and signage will be displayed on board the vessel during operations.

7.7. Emergency Response Monitoring and Testing arrangements

The responsibilities for monitoring the effectiveness of the emergency response plans are the following:

- Vessel emergency scenarios are monitored through the vessel operator's Safety Management System, covering regular testing and feedback.
- Licence activity-specific scenarios (e.g., LiDAR buoy deployment) are managed under the LiDAR Buoy Provider's Safety Management System.
- BFE is responsible for the implementation of the management plan, ensuring emergency response arrangements are effective and comprehensive.

The vessel operator will conduct regular drills, including at minimum:

- Man overboard recovery
- Oil spill response
- Personal injury response

The LiDAR buoy provider will provide a drill schedule to BFE and ensure internal drills cover:

- Detection and recovery of a drifting LiDAR buoy
- Medical evacuation from an offshore vessel

ERPs will be tested in accordance with the following schedule:

- When the emergency response plans are introduced, to verify all scenarios and situations have been identified, and emergency contact details are correct.

- When the emergency response plan is significantly modified or at least once every 12 months, whichever is earlier.
- One emergency response drill will occur at least once per vessel trip for the LiDAR activity and may overlap with one of the above testing schedules.
- A tabletop exercise will be conducted at vessel mobilisation to test injury response procedures and emergency contact numbers.
- A drifting LiDAR buoy scenario exercise will be conducted between the LiDAR Buoy Provider and BFE prior to deployment.
- The drifting LiDAR buoy scenario will be re-tested within the first three months of operation to validate response procedures and emergency contacts.

The objective of emergency response plan testing is to ensure that:

- Scenarios, situations and identified response actions are identified, viable and valid.
- Workers are appropriately trained and instructed on their role in emergency response and can practice their responsibilities.
- Effectiveness of the plans are tested
- Gaps are identified, leading to improved plans and response actions for future work.

A real emergency event will take the place of a drill if it occurs.

Following testing of the emergency response plan, or a real emergency event, a debrief including generation of lessons learned shall be implemented to ensure exhaustive feedback is obtained from the situation. The lessons learnt shall be shared with all workers and organisations involved in the test or event. Actions resulting from the test or event may also be assigned where the actions resulting from the test or event may also be assigned where these would improve the emergency response plans.

8. Health And Safety

8.1. Obligations under the WHS Act

BFE, as the licence holder and a Person Conducting a Business or Undertaking (PCBU), acknowledges its primary duty under the Work Health and Safety (WHS) Act to ensure, so far as reasonably practicable, the health and safety of all workers involved in the LiDAR buoy activity. This includes employees, contractors, and other persons at the worksite. BFE's obligations and approach to compliance are as follows:

8.1.1. Duties of persons conducting a business or undertaking

In accordance with the WHS Act, BFE, as the Person Conducting a Business or Undertaking (PCBU), holds the primary duty of care to:

- Eliminate or minimise health and safety risks, as far as reasonably practicable.
- Provide a safe work environment, safe systems of work, and adequate facilities.
- Ensure proper handling, storage and transport of equipment and substances.
- Provide necessary information, training and supervision.
- Monitor worker health and workplace conditions.
- Maintain any accommodation under BFE’s control in a safe condition.

BFE demonstrates compliance through the appointment of competent contractors (e.g. the LiDAR buoy provider), implementation of robust HSEQ procedures, and alignment with legal requirements and industry best practices.

8.1.2. Shared duties

LiDAR buoy provider: As a PCBU and Principal Contractor, the LiDAR buoy provider shares WHS duties. It will prepare and implement a Project Execution Plan and HSSEQ Plan to manage risks in deploying, servicing, and recovering the LiDAR buoy. Plans will be reviewed by BFE and shared with all personnel.

Vessel Contractor: Also, a PCBU, responsible for the vessel as the primary workplace. The vessel master manages WHS at sea and shares safety documentation with all workers.

8.1.3. Duties of other persons at the workplace

All persons at the workplace must take reasonable care for their own health and safety and comply with WHS instructions issued by BFE or its contractors.

8.1.4. Officers

Officers within BFE, the LiDAR buoy provider, and the vessel contractor (as listed in Table 8-1) must exercise due diligence. This includes staying informed on WHS matters, understanding work-related risks, ensuring adequate resources and processes are in place, and monitoring compliance.

Table 8-1 Officer role designation across BFE, the LiDAR buoy provider and Vessel

Entity	Officer role designation
BFE	Project Director Head of Health and Safety
LiDAR buoy provider	General Manager Project Manager Project Director Party Chief
Vessel contractor	Vessel Master

8.1.5. Incident Notification Obligations

BFE will comply with the requirement to notify WorkSafe Victoria and the Offshore Infrastructure Regulator (OIR) of any serious injury, illness or dangerous incident under the OHS Act and the OEI Act. This includes specific triggers such as hospitalisation, exposure to substances, electrical shocks, or equipment failure.

8.1.6. The right to cease work

All personnel have the right to cease work if they believe there is a risk of imminent and serious harm. Concerns must be escalated through supervisors and duty holders before work resumes.

8.1.7. Issue resolution

All duty holders will work collaboratively to resolve health and safety issues. Unresolved issues will escalate from the LiDAR buoy provider and the vessel contractor to BFE, and then to the OIR if necessary.

8.2. Interface Management

BFE will ensure effective coordination, consultation, and communication between all duty holders. Interface arrangements with the LiDAR buoy provider and the vessel contractor are designed to identify, assess and control WHS risks throughout the LiDAR buoy activity.

9. References

BMT. 2024. “Gippsland Dawn Offshore Wind Project - Preliminary Desktop Marine Environmental Assessment.” - 004-00. October 2024.

Gippsland Ports, 2016. Gippsland Lakes. Accessed from https://www.gippslandports.vic.gov.au/ports-and-waterways/ports-and-waterways/gippsland-lakes/ on 29 August 2024

GLaWAC. 2024. “Sea Country”. Accessed from https://gunaikurnai.org/our-country/sea-country/ October 2024.

RPS. 2024a. Project Execution Plan – Gippsland Dawn Offshore Wind Project Measurements. P358651, Rev0, June 2024, 100-FD-PLN-0233.

RPS. 2024b. Deployment Workpack – Gippsland Dawn Offshore Wind Project Measurements. P358651, 17 October 2024, 100-FD-PLN-0248.

RPS. 2024c. LiDAR Deployment EPBC Self-Assessment. Gippsland Dawn Offshore Wind Farm. November 2024.

Appendix A - Detailed Stakeholder Consultation Report

Stakeholder	Date / format	Relevance	Comments on LIDAR buoy activity	How addressed in the Management Plan
Department of Defence	2 August 2024 - Online introductory meeting Email 15 October 2024 seeking feedback on LIDAR buoy deployment	Risk of interference with military activities or areas.	DoD advised on 22 November 2024 that they have no concerns with the deployment of the LIDAR buoy.	N/A
Department of Agriculture, Fisheries and Forestry (DAFF)	9 October 2024 Initial introductory meeting	Potential impact on fishing industry	No comments received.	N/A
Bureau of Meteorology	6 November 2024 - Online introductory meeting	Risk of interference with weather monitoring activities.	No concerns about the LiDAR buoy.	N/A
Director of National Parks	3 October 2024 - Online introductory meeting	Impacts on Australian Marine Parks.	No concerns about the LiDAR buoy as not in proximity of any Australian Marine Parks.	N/A
Australian Maritime Safety Authority	3 October 2024 - Online introductory meeting Email 15 October 2024 seeking feedback on LIDAR buoy deployment	Impacts on navigational safety	No comments	N/A
Hydrographic Office	22 October 2024 Email	Safety of vessels	No specific comments. Provided Gippsland Dawn with the information required for drafting a Notice to Mariners prior to deployment.	N/A
Lakes Entrance Fishing Co-Operative	September – December 2024 Various in-person, online and e-mail engagements	Impacts on commercial fishing operations	Received feedback on LiDAR buoy location, how this is communicated to operators, potential compensation and safety concerns.	Following feedback received from Lakes Entrance Fishing Co-Operative, BFE has responded to feedback per Table 3-10.
South East Trawl Fishing Association (SETFIA) Southern Shark Industry Alliance (SSIA)	August – December 2024 Various in-person, online and e-mail engagements	Impacts on commercial fishing operations	SETFIA expressed concern for its members about the impact the location of the floating LiDAR buoy would have on commercial operations. Also raised safety concerns about potential interactions between the buoy and fishing vessels.	Following feedback received from SETFIA, BFE has responded to feedback per Table 3-10.
Seafood Industry Victoria (SIV)	August 2024 Initial online introductory meeting	Impacts on commercial fishing operations	Expressed desire to keep members informed about the project and upcoming activities.	BFE has committed to ongoing engagement with SIV and will look at opportunities to send

Stakeholder	Date / format	Relevance	Comments on LIDAR buoy activity	How addressed in the Management Plan
	and email correspondence			information via SIV's database of commercial fishing operators.
Victorian Fishers Association (VFA)	1 October 2024 Initial introductory meeting	Impacts on commercial fishing operations	The VFA has requested to be kept informed about upcoming activities associated with the Gippsland Dawn project.	BFE has committed to maintaining ongoing engagement with the VFA. Updated Table 3-3.
Gunaikurnai Land and Water Aboriginal Corporation (GLaWAC)	September – December 2024 Various in-person, online and e-mail engagements	Potential impacts on Sea Country	No comments received.	N/A
Esso	2 October 2024 - E-mail outlining requirements for floating LiDAR buoy deployment and seeking feedback.	Potential impacts on operations.	The project team have reviewed the activities and have no major concerns, only that you please keep us in the loop on which vessel is installing, timing, and awareness if working from Barry Beach Marine Terminal.	Updated Table 3-3.
CarbonNet	25 September 2024 Online introductory meeting	Potential operational interfaces.	No comments received.	N/A
GB Energy	16 October 2024 E-mail introduction seeking feedback on LiDAR buoy deployment	Potential operational interfaces.	No comments received.	N/A
Hibiscus Energy/ EXCEED	15 October 2024 E-mail explaining LiDAR buoy deployment and seeking feedback	Potential operational interfaces.	Request for further information on mooring design. Mooring design provided. No further comments.	N/A
Federal Member for Gippsland (Darren Chester MP)	5 November 2024 Project briefing	Impacts and opportunities for local community and businesses	Expressed the importance of the fishing industry and desire to minimise disturbances/ impacts to fishing in the area.	Updated Table 3-3.
State Member for Gippsland East (Tim Bull MP)	July – November 2024	Impacts and opportunities for local community and businesses	Expressed the importance of the fishing industry in Gippsland and the need for ongoing engagement with the industry. Requested to be kept informed of engagement and activities.	Updated Table 3-3.
State Member for Gippsland South (Danny O'Brien MP)	23 July 2024	Impacts and opportunities for local community and businesses	No comments received.	N/A
East Gippsland Shire Council	1 October 2024 Online project briefing	Interest in development and potential impact	Questioned the extent of Gippsland Dawn's engagement with the fishing industry and how we can minimise impacts to commercial and recreational fishers.	BFE has responded to feedback per Table 3-10.
Gippsland Ports	17 October 2024	Use of ports and impact on shipping channels	Requested to be engaged early in relation to future survey activities.	Updated Table 3-3.