

Chapter 28: Environmental Management Framework

Environment Effects Statement



28 Environmental Management Framework

28.1 Introduction

This chapter presents the Environmental Management Framework (EMF) which would be adopted for Victoria to New South Wales Interconnector (VNI) West (Victorian component) (the Project). The EMF describes the governance and assurance framework that would be applied to manage, monitor and report on environmental effects and risks associated with the Project, and sets out the proposed Environmental Performance Requirements (EPRs) for the Project.

The requirement for an EMF is prescribed in the EES scoping requirements and is reflected in the draft Incorporated Document that forms part of the draft Planning Scheme Amendment (PSA) attached to this EES (Attachment I).

For the purposes of this EMF, and consistent with the primary and secondary approvals that may be required should the Project proceed, the Incorporated Document applies to all land within the Specific Controls Overlay (SCO). This land is referred to throughout this EMF as the “Project Land”.

The Project would be developed by VicGrid VNI West Pty Ltd (VicGrid VNI West) with support from a Development Partner. Subject to completion of the relevant approvals, procurement and commercial processes, the Development Partner would enter into the Delivery Deed and, for the purposes of this EMF, would be referred to as the Delivery Partner/Principal Contractor. Construction would be delivered through the Delivery Partner/Principal Contractor arrangement, and operation and maintenance would be undertaken by the transmission network service provider (TNSP) in accordance with the applicable transmission licence and relevant regulatory requirements.

28.2 Purpose of the EMF

This chapter responds to section 3.6 of the VNI West EES Scoping Requirements, which require the EES to include an EMF that describes a transparent governance framework with clear accountabilities for complying with approvals and for managing, monitoring and reporting on the environmental effects and risks of the Project across all phases. Consistent with the Scoping Requirements, the EMF also establishes the basis for the subsequent development, approval, implementation and review of environmental management plans (including consultation requirements), and links environmental performance to baseline conditions, monitoring and continuous improvement.

The purpose of this EMF is to:

- Provide the overarching governance framework for the management of environmental effects of the Project during construction, operation and decommissioning.
- Set out the EPRs that would be implemented to avoid, minimise or manage potential adverse environmental effects of the Project, and identify the relevant statutory approvals that would give effect to these.
- Establish the framework for maintaining an environmental risk register, applying change management processes, and managing baseline and monitoring data (including access and transparency) to support accountability and continuous improvement.
- Enable finalisation of environmental management arrangements following consideration of EES submissions, matters raised during the Inquiry and Advisory Committee (IAC) hearing, the IAC’s report and recommendations, and the Minister for Planning’s Assessment. Following a positive assessment of the EES by the Minister for Planning, this EMF would be updated to address recommendations made by the Minister for Planning.

- Provide a guiding framework to support the preparation of statutory approvals and consents and any associated environmental management plans required by EPRs to implement the environmental outcomes established by those EPRs; to review the effectiveness of EPRs and to foster continuous improvement across the construction, operation and decommissioning phases of the Project.

If the PSA is approved by the Minister for Planning, the updated EMF would be given statutory effect and would be enforceable by the Minister under the *Planning and Environment Act 1987* (P&E Act) - see Section 28.5.1.

Note that where the conditional tense is used in this EMF (such as the use of the word 'would' rather than 'will'), this reflects that the Project proceeding is conditional on the outcomes of the Minister for Planning's assessment of the EES and the receipt of required approvals.

28.3 Scope of the EMF

This section defines the scope of the EMF and clarifies the works and activities to which it applies.

The EMF establishes environmental management arrangements for the Project as assessed in the EES and authorised through relevant statutory approvals. It applies to all phases of the Project, including construction, operation and decommissioning, unless otherwise specified.

Where a potential inconsistency is identified between this EMF and another statutory approval or approval condition, the matter must be escalated and resolved through the relevant approval, governance or change management process before affected works proceed.

28.3.1 Works covered by the EMF

The EMF applies to all works and activities forming part of the Project, including:

- All works authorised under the PSA, SCO and Incorporated Document (if approved), including the proposed amendment to the Schedule to Clause 37.01 (Special Use Zone) of the Gannawarra Planning Scheme, to introduce a new Schedule 5 (Terminal Station (SUZ5))
- Works required to comply with primary approvals, including the *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC Act) approval and Cultural Heritage Management Plan(s) (CHMPs)
- Construction of the transmission line, associated infrastructure and ancillary facilities within the Project Land, including associated traffic management
- Establishment and use of temporary works areas, including access tracks, laydown areas, construction compounds, workforce accommodation, site offices and temporary stockpiles
- Utility relocations, service connections and other enabling works required to deliver the Project
- Operation and maintenance of the transmission infrastructure, including vegetation management and inspection activities
- Decommissioning activities, if and when required
- Works undertaken by the Delivery Partner/Principal Contractor, and its subcontractors, engaged by VicGrid VNI West for the delivery of the Project

28.3.2 Works excluded from the EMF

The EMF does not apply to:

- Broader strategic planning, policy development or renewable energy zone (REZ) coordination activities undertaken by VicGrid that are not specific to the Project

- Works undertaken by third parties that are not under the direction or control of VicGrid VNI West or the Delivery Partner/Principal Contractor (e.g. minor utility relocation and/or protection works that would be subject to utility provider processes and permitting requirements)
- Electricity market operations, system dispatch decisions or broader network operations not directly associated with the Project infrastructure
- Activities regulated under separate statutory frameworks where environmental management obligations are governed independently of this EMF, except to the extent that those obligations are incorporated into Project approvals

28.4 How the EMF operates

This section explains how the EMF functions within the overall approval and delivery system for the Project. It clarifies the relationship between the EMF, plans required by the Incorporated Document, and management plans required by EPRs and statutory approvals, and describes what is established at Project approval and what is developed during subsequent stages of the Project.

The intent of this section is to provide a clear and transparent explanation of how environmental commitments are set, implemented, monitored and enforced throughout the Project lifecycle.

28.4.1 What the EMF does and does not do

The EMF is a strategic governance document prepared in response to the EES Scoping Requirements and required to be approved under the Incorporated Document (if approved). Once approved, the EMF has statutory effect through the Incorporated Document.

The EMF:

- Establishes the overarching environmental governance framework for the Project
- Sets binding EPRs that define the environmental outcomes the Project must achieve
- Specifies the management plans which are required to achieve those outcomes
- Defines roles, responsibilities and accountability for environmental management
- Specifies the framework for preparation, review and approval of plans required by the Incorporated Document and subsequent environmental management plans
- Establishes monitoring, auditing, reporting and compliance mechanisms
- Provides the structure for change management and continuous improvement

The EMF does not:

- Contain detailed construction methodologies
- Replace the need for phase-specific environmental management plans
- Include property-specific management measures at a level of detail that depends on final design, contractor appointment or land access
- Authorise development beyond that assessed in the EES or permitted under statutory approvals

The EMF therefore establishes the binding performance framework and governance system within which more detailed management documentation is developed and implemented.

28.4.2 Hierarchy of environmental controls

Environmental management for the Project operates through a hierarchy of statutory Project Documents, phase-based environmental management plans and plans and procedures required by the EPRs. The hierarchy, including preparation, review, verification and approval or acceptance pathways, is described in Section 28.7 and Table 28-4.

Figure 28-1 illustrates this hierarchy, distinguishing between:

Level 1: Statutory documents approved or accepted under the Incorporated Document

Level 2: The EMS and phase-based management plans required by the EMF

Level 3: Management plans required by EPRs.

The statutory approval and environmental management documentation pathways for the Project, including which documents require statutory approval and which are developed and accepted under the EMF, are described in Sections 28.5 and 28.7 and summarised in Table 28-4. Detailed implementation arrangements may be progressively developed as detailed design, site investigations and delivery planning advance, subject to the EPRs and the change management requirements in Section 28.8.



Figure 28-1 Hierarchy of environmental management documentation for the Project.

28.5 Statutory approvals and consents

This section summarises the statutory approvals and consents that are expected to apply if the Project proceeds. Further detail on the regulatory framework is provided in *EES Chapter 5: Legislative framework*.

For the purposes of this EMF, primary approvals are the principal statutory approvals required to authorise the Project and establish the overarching approval framework (including the Incorporated Document). Secondary approvals are activity- or location-specific permits, licences or consents required to undertake particular works and must be in place prior to commencement of the relevant activity. VicGrid VNI West would be responsible for obtaining the primary approvals, while the Principal Contractor and its subcontractors would obtain secondary approvals relevant to their scope of works, as required.

28.5.1 Primary approvals

Table 28-1 outlines the primary approvals that would be required prior to commencement of the Project. These approvals would be progressed following, and informed by, the Minister for Planning's Assessment of the EES, and the conditions of those approvals would be expected to be consistent with, and give effect to, the intent of that Assessment.

Table 28-1 Primary approvals

Legislation	Statutory approval	Statutory approval authority	Key requirements/implications for this EMF
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act)	Approval of the controlled action	Commonwealth Minister for the Environment and Water (or delegate)	The Project was determined to be a controlled action on 13 June 2024. The Victorian EES process was determined to be the accredited assessment process under the Bilateral Assessment Agreement. Following the Victorian Minister for Planning's Assessment, the Commonwealth Minister (or delegate) will decide whether to approve the action (with or without conditions) or refuse it. Matters of national environmental significance potentially affected include Ramsar wetlands, listed threatened species and communities, and listed migratory species.
<i>Aboriginal Heritage Act 2006</i>	Cultural Heritage Management plans (CHMP(s) are required (currently anticipated as six)	Minister for Aboriginal Affairs/First Peoples – State Relations and relevant Registered Aboriginal Party/ies (RAPs)	CHMPs are being prepared in consultation with First Peoples – State Relations and Traditional Owner groups. RAPs for parts of the Project Area include Barengi Gadjin Land Council (BGLC) and Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA), who will evaluate CHMPs and determine approval for relevant areas. First Peoples – State Relations is responsible for approving CHMPs in the non-RAP area. Refer to Figure 25-1 in <i>EES Chapter 25: Aboriginal cultural heritage</i> for RAP boundaries.

Legislation	Statutory approval	Statutory approval authority	Key requirements/implications for this EMF
<i>Planning and Environment Act 1987</i> (P&E Act)	Planning Scheme Amendment (PSA)*	Minister for Planning	The draft Incorporated Document requires the EMF to be submitted to the Minister for Planning for approval prior to commencement of development for any stage or component of the Project (excluding Preparatory Buildings and Works) (clause 7.4). The EMF must be accompanied by a statement explaining any difference between it and the matters set out in the Minister for Planning's Assessment under the <i>Environment Effects Act 1978</i> (EE Act) (clause 7.5), include the EPRs on the matters set out in clause 7.6, and set out the process, content and timing for the development of environmental management documentation specified in clause 7.7. Clause 7.8 requires the use and development of the Project is carried out in accordance with the approved EMF. The Incorporated Document also requires approval of the other Project Documents identified in clause 6.1.

*PSA to the Gannawarra, Loddon, Buloke and Northern Grampians planning schemes. It is proposed to apply a Specific Controls Overlay (SCO) to the Project Land with an Incorporated Document. In addition, the Tragowel Terminal Station site would be rezoned to a Special Use Zone—Schedule 5.

The Incorporated Document would provide the primary statutory mechanism to require the preparation of the EMF, EPRs and relevant management documentation. It would establish the triggers for submission and approval of Project Documents required before the relevant stage or component commences and the process for amendments to the Project Documents.

Further detail on each approvals process is provided in *EES Chapter 5: Legislative framework*. This EMF focuses on how the approvals framework is translated into enforceable EPRs, management plans, auditing and reporting.

28.5.2 Secondary approvals

Table 28-2 outlines secondary approvals that may be required in connection with this EMF, subject to detailed design and the outcomes of the EES and statutory approval processes. Where required under the EE Act, relevant decision-makers must consider the Minister for Planning's Assessment when determining those approvals. Conditions of secondary approvals would be incorporated into the relevant Project management documentation and compliance processes under this EMF.

Table 28-2 Secondary approvals

Victorian Legislation	Statutory approval	Statutory approval authority	Key requirements/implications for this EMF
<i>Flora and Fauna Guarantee Act 1988</i> (FFG Act) <i>Flora and Fauna Guarantee Amendment Act 2019</i> <i>Flora and Fauna Guarantee Regulations 2020</i>	Any threatening process or removal of protected flora, which includes threatened flora species and the plants that make up threatened communities, listed under the FFG Act from public land require a Protected Flora Licence or Permit under the Act, obtained from DEECA. Any Licence or Permit obtained under the FFG Act must also satisfy the approving authority in matters concerning Section 4, 4A, 4B and 4C of the <i>Flora and Fauna Guarantee Amendment Act 2019</i>, as required.	Secretary to the Department of Energy, Environment and Climate Action (DEECA) (or delegate)	Requirements would be addressed through biodiversity/vegetation management measures, pre-clearance surveys, salvage/relocation procedures (where applicable) and offset/compensation requirements as relevant.
<i>Water Act 1989</i>	Consent for minor waterway work may be required for each crossing of a waterway by the proposed transmission line Approval from the relevant Catchment Management Authority (CMA) would be required for any works on, over or under a designated waterway. Approval is required before the commencement of construction.	Relevant CMA	Requirements would be addressed through waterway crossing design, construction controls, erosion and sediment control, rehabilitation and monitoring requirements set out in relevant management plans.
<i>Wildlife Act 1975</i>	An authorisation would be required for the necessary control or management of any wildlife listed under the Wildlife Act, including removal or salvage activities.	Secretary to DEECA (or delegate)	Requirements would be addressed through fauna management protocols, salvage/handling procedures and compliance reporting as relevant.
<i>Road Management Act 2004</i> (and related instruments)	Agreement is required between the land manager and the beneficiary landowner prior to approval of works within the road reserve. Road reserves permit, road opening permits and vehicle crossing permits. Over-size vehicle/Over dimensional load permits Memoranda of understanding with councils (if required).	Relevant road authority (Council and/or State road authority) and National Heavy Vehicle Regulator (NHVR), as applicable	Requirements would be addressed through the requirement for traffic management plan to be implemented upon finalisation of detailed design.

Victorian Legislation	Statutory approval	Statutory approval authority	Key requirements/implications for this EMF
<i>Catchment and Land Protection Act 1994</i>	Construction of the project may require a permit for the management of noxious weeds and pest animals under Section 71.	Secretary to DEECA (or delegate) and/or relevant land manager	Requirements would be addressed through biosecurity measures, weed hygiene protocols, vehicle washdown, and management/monitoring actions in relevant plans.
<i>Heritage Act 2017</i>	Permit/consent/approval to disturb registered heritage places/objects or archaeological sites (if applicable)	Executive Director, Heritage Victoria (or delegate)	Requirements would be addressed through historical heritage management measures, unexpected finds procedures, and consultation/approvals where required.

Compliance with statutory approval conditions will be the responsibility of VicGrid VNI West and the Delivery Partner/Principal Contractor. Independent assurance activities, including audits by suitably qualified personnel at agreed intervals, would be undertaken to verify implementation of the EMF and associated management plans, as described in Section 28.9.1

Some key aspects of compliance related to the EMF are discussed below for the *Environment Protection Act 2017* (EP Act) and *Electricity Safety Act 1998*. Further detail on other relevant legislation and compliance requirements for the Project is provided in *EES Chapter 5: Legislative framework*.

28.5.3 *Environment Protection Act 2017*

In addition to statutory approvals listed in Table 28-1 and Table 28-2, the Project would need to meet the obligations of the general environmental duty (GED) and notification duties under the *Environment Protection Act 2017* (EP Act) during each stage of the Project as well as all relevant EPA regulatory compliance requirements.

Compliance with the General Environmental Duty (GED)

EPRs have been developed with a view to meeting the obligations of relevant duties under the EP Act, including the GED. The GED (s25) is a continuing duty and requires that a person engaging in an activity that may give rise to risks of harm to human health or the environment from pollution or waste must minimise those risks, so far as reasonably practicable. In determining what is reasonably practicable, regard must be had to the matters set out in s6(2) of the EP Act, including:

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

Further guidance as to what is considered reasonably practicable is set out in EPA Victoria Publication 1856: Reasonably Practicable.

Environmental Duties

The EP Act includes duties, which VicGrid VNI West and its contractors would be required to comply with during each stage of the Project, including:

- The duty to respond to harm (s31)
- Duty to notify of an event (s32-33)
- Duty to manage contamination (s39)
- Duty to notify of certain contamination (s40)
- Duties relating to industrial waste (s133-137 and Regulation 60-64)
- Duties and controls relating to priority waste (s138-141 and Regulation 65-70)
- Duties and controls relating to reportable priority waste (s142-143 and Regulation 71-77)

28.5.4 Energy safety

Once operational, the TNSP will be required to comply with the *Electricity Safety Act 1998*. Energy Safe Victoria (ESV) is the statutory body established by the *Energy Safe Victoria Act 2005*, to monitor and enforce compliance with Victoria's energy safety legislative framework.

The TNSP must have an Electricity Safety Management Scheme (ESMS) accepted by ESV, describing how the TNSP will meet its duties under section 98 of the *Electricity Safety Act*. An ESMS must meet the requirements of the *Electricity Safety (Management) Regulations 2019*, including a requirement that the TNSP's safety management system complies with the requirements of the standard: AS5577-2013 *Electricity network safety management system*.

The ESMS must contain a Bushfire Mitigation Plan (BMP) which is required to include details of:

- Specific preventative strategies and programs to mitigate the risk of the transmission line and network causing a fire
- The systems, processes and procedures to operate and maintain the network in times or zones of high bushfire risk
- The accepted ESMS (inclusive of the BMP) is an enforceable, legal commitment prepared by the TNSP.

The TNSP must also manage vegetation clearance around transmission lines. The TNSP must submit a written Electric Line Clearance Management Plan to ESV at least once every five years in accordance with the *Electricity Safety (Electric Line Clearance) Regulations 2020*. The plan must detail how the TNSP will manage vegetation and ensure minimum clearance spaces are maintained in accordance with the minimum clearance space as set out in the *Code of Practice for Electric Line Clearance – Victoria*.

28.6 Roles and responsibilities

This section outlines the roles and responsibilities for environmental management of the Project. VicGrid VNI West is the Project proponent and (if the Project proceeds) would be responsible for the overall governance of environmental management and for ensuring compliance with applicable statutory approvals, including the primary approvals summarised in Table 28-1.

VicGrid VNI West's contractors (including the Delivery Partner/Principal Contractor and subcontractors) would be responsible for implementing relevant EPRs and for complying with approval conditions within their scope of works. Relevant regulatory bodies would be responsible for issuing, administering and enforcing secondary approvals (Table 28-2).

For the purposes of this EMF:

- The Development Partner supports VicGrid VNI West during project development and approvals before commencement of the delivery arrangements
- The Delivery Partner/Principal Contractor is responsible for coordinating detailed design and construction delivery, including appointment and management of the D&C Contractor and subcontractors
- The D&C Contractor undertakes detailed design and construction activities under the direction of the Delivery Partner/Principal Contractor
- Subcontractors and other delivery parties undertake specific Project activities within their contracted scope and remain subject to the EMF, EPRs and applicable management plans
- The TNSP is responsible for operation and maintenance of the Project and, where relevant, oversight of decommissioning

An entity may perform more than one of these roles; however, the responsibilities applying under this EMF are determined by the role being performed and the relevant Project phase.

The role terminology used in this EMF describes functional environmental responsibilities and does not prescribe the contractual structure through which those responsibilities are delivered. Project contractual arrangements must ensure that applicable EMF, EPR and management plan obligations are allocated and flowed down to the entities undertaking the relevant activities.

28.6.1 Governance framework for construction

The Project would be developed by VicGrid VNI West with support from a Development Partner. Subject to the relevant approvals, procurement and commercial arrangements, the entity appointed to perform the Delivery Partner/Principal Contractor role would coordinate detailed design and construction delivery, including appointment and management of the D&C Contractor and subcontractors.

Construction and, where relevant, decommissioning activities would be delivered by a Design and Construct Contractor and its subcontractors engaged by the Delivery Partner/Principal Contractor, in accordance with the detailed design, contractual requirements and applicable statutory approvals.

The governance framework for construction is shown in Figure 28-2 with further detail on roles and responsibilities provided in Table 28-3.

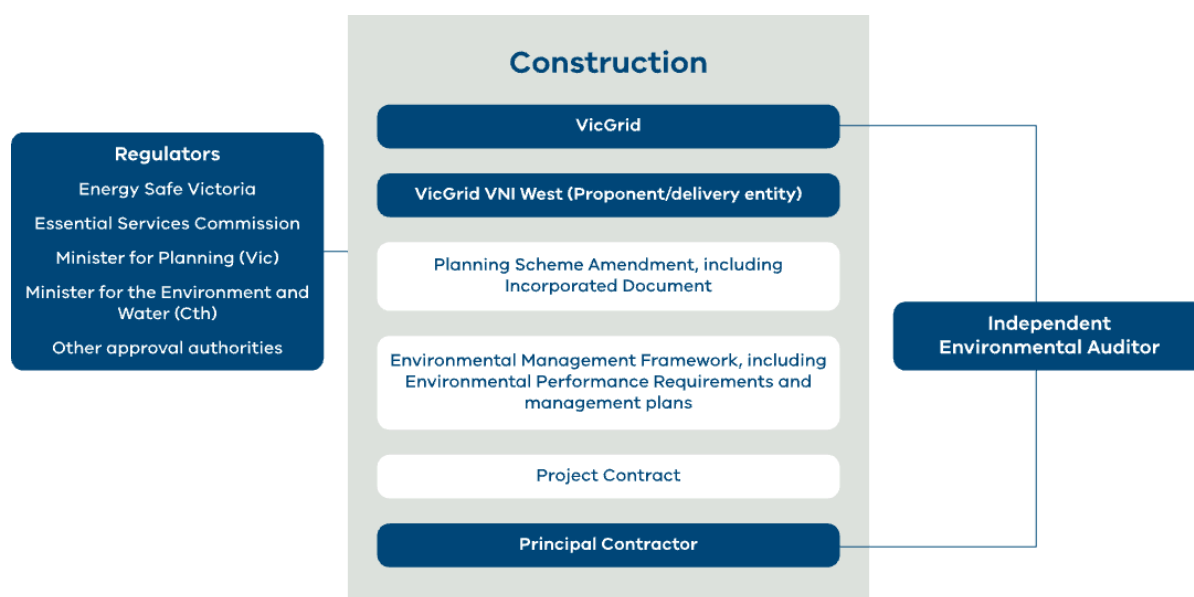


Figure 28-2 Governance framework for construction

Legally binding contracts between VicGrid VNI West and the Delivery Partner/Principal Contractor would require compliance with the EMF and any associated environmental management plans required under approvals.

VicGrid VNI West would engage an Independent Environmental Auditor (IEA) to provide independent verification and assurance (refer EPR EM02). Prior to the commencement of relevant works, the IEA would review key contractor environmental management documentation (including the CEMP and relevant management plans, where required) to confirm alignment with this EMF and applicable approval conditions. During construction the IEA would undertake audits at agreed intervals to assess ongoing compliance and the effectiveness of environmental controls and would report findings and corrective action requirements to VicGrid VNI West (and to regulators where required).

Compliance with approved Cultural Heritage Management Plans (CHMPs) is required under the *Aboriginal Heritage Act 2006*. Implementation of CHMP conditions will be incorporated into relevant management plans. Where CHMP-related requirements are reflected in EPRs or statutory approval conditions, compliance may be subject to IEA verification; however, statutory oversight remains with the relevant Registered Aboriginal Party or First Peoples – State Relations.

28.6.2 Governance framework for operation

The TNSP would be responsible for operation and maintenance of the Project, including ongoing implementation of and compliance with the EMF. Operational environmental management would be implemented through the TNSP's systems and procedures, including any plans required by statutory approvals and relevant regulatory frameworks. For the purposes of this EMF, the TNSP is treated as a distinct role from the Delivery Partner/Principal Contractor because operation and maintenance are subject to different responsibilities and regulatory requirements across the Project lifecycle.

The operational governance structure would also include core cross-cutting plans and procedures required by the EMF, including the Community and Stakeholder Engagement Plan (CSEP), which would support consistent implementation of engagement, communication, complaints management and issue escalation processes across the Project lifecycle.

Under the EE Act, all Victorian decision-makers to whom the Minister has given notice under that Act must consider the Minister’s assessment before determining statutory approvals under their respective jurisdictions. Notably this also includes including the Minister for Planning with respect to their decision-making responsibilities under the P&E Act. Under the terms of the EPBC Act bilateral agreement between the Commonwealth and Victoria, the Commonwealth Minister for the Environment and Water must consider the Victorian Minister for Planning’s assessment.

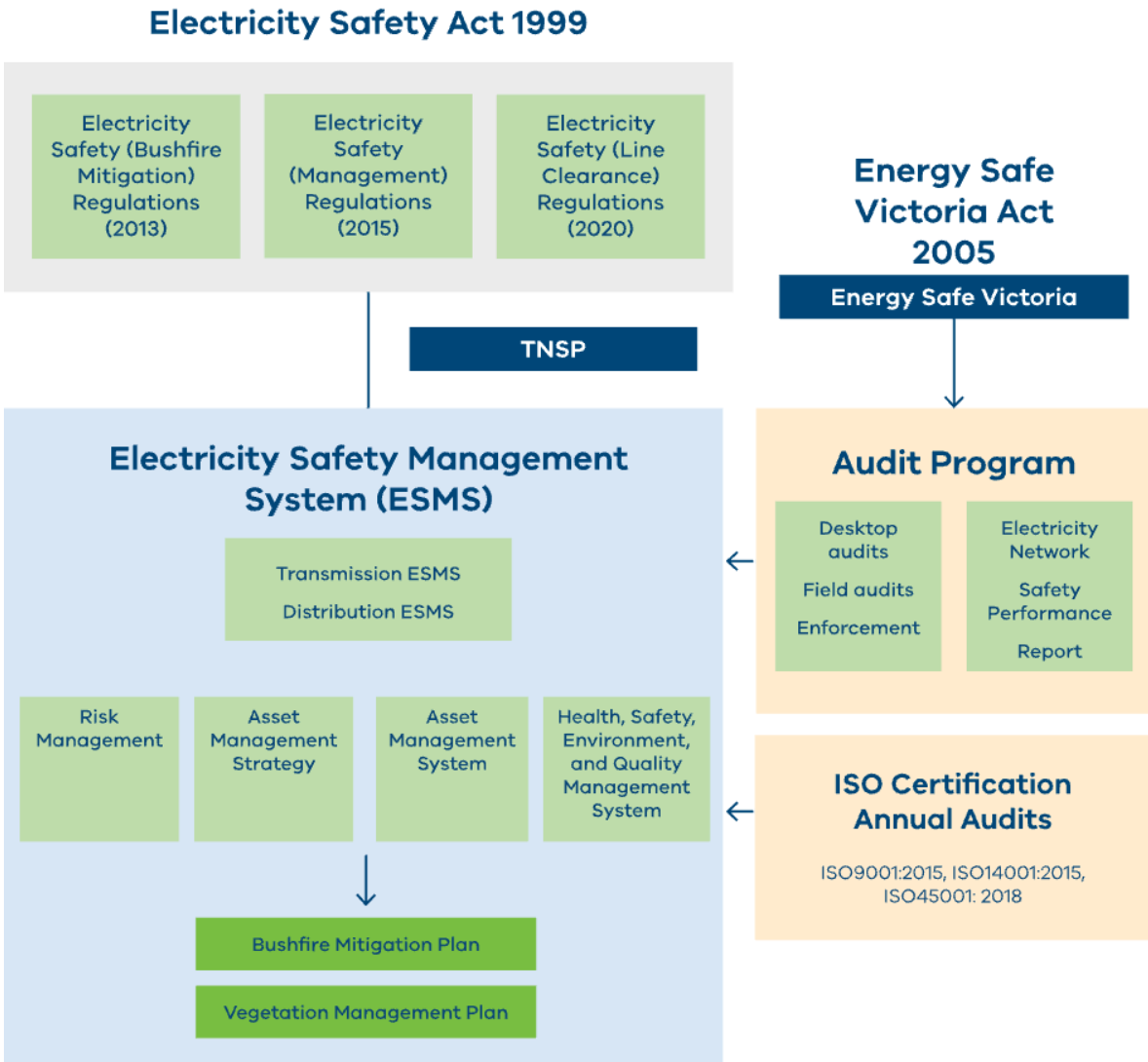


Figure 28-3 Governance Framework for operation

Operation and maintenance would be undertaken by the TNSP. Although the same entity may ultimately perform both the Principal Contractor (for detailed design and construction delivery) and TNSP roles, they are treated separately in this EMF because they are subject to different responsibilities and regulatory requirements across the project lifecycle.

The proposed roles and responsibilities for environmental management, including responsibilities for approvals, plan preparation and implementation, assurance and reporting at all Project phases, are summarised in Table 28-3.

Table 28-3 Construction and operational roles and responsibilities

Organisation	Role	Responsibility
VicGrid	Victorian Transmission Network Planner/client	- Planning and management of the declared shared network and all associated functions. - Procurement and oversight of the delivery of VNI West set out in the Victorian Transmission Plan.
VicGrid VNI West	EES Proponent/ Project client	All phases - Hold overall accountability for environmental compliance and performance for the Project. - Fulfill responsibilities and maintain compliance with contractual arrangements with VicGrid. Design/Pre-construction - Obtain (or cause to be obtained) and comply with applicable primary approvals (including PSA/SCO & Incorporated Document; EPBC approval; CHMP(s)). - Finalise and submit the EMF for approval, having regard to submissions, IAC outcomes, the Minister for Planning's Assessment, and the provisions of the approved PSA that provide statutory effect to the EMF. - Establish the overarching environmental governance arrangements (including EMS requirements, risk register, change management, monitoring and reporting framework). - Establish and administer the delivery model, including appointment and oversight of the Delivery Partner/Principal Contractor. - Develop and implement procurement and contractual requirements to ensure obligations under approvals and EPRs are appropriately flowed down through the delivery chain. - Review and accept contractor environmental management plans where required under the EMF, and arrange for independent verification or statutory approval where required by the EMF or applicable approval conditions. Construction - Oversee and monitor compliance by the Delivery Partner/Principal Contractor and require corrective actions where necessary. - Ensure incidents and complaints are managed and reported in accordance with approvals and legal duties. - Ensure independent assurance is implemented, including appointment and resourcing of the IEA, and that reporting is provided to regulators as required. Operation/Decommissioning - Maintain oversight of operational and decommissioning compliance arrangements, as relevant, including interface with the TNSP and any decommissioning contractor.

Organisation	Role	Responsibility
Delivery Partner/ Principal Contractor	Design and construction delivery coordination	Design/Pre-construction • Lead and coordinate detailed design development and constructability to give effect to the EPRs and approval conditions. • Appoint, manage and oversee the D&C contractor and other subcontractors engaged to finalise design and construct the Project. • Support procurement and delivery planning, including provision of technical inputs to approvals, design refinement and environmental management documentation. • Assist VicGrid VNI West with planning/approvals processes and stakeholder engagement as agreed. • Prepare, or cause to be prepared, the CEMP and relevant construction management plans and procedures required under the EMF and EPRs. Construction • Deliver, or cause to be delivered, the design finalisation and construction of the Project in accordance with the detailed design, statutory approvals, the EMF, EPRs and approved management plans. • Manage the D&C contractor and subcontractors to ensure compliance with environmental, heritage and approval requirements. • Implement the CEMP and relevant construction plans, monitoring, reporting, incident response and corrective action processes. • Provide compliance documentation to VicGrid VNI West and the IEA for review and audit.
Transmission Network Service Provider (TNSP)	Operator/ maintenance entity/licensed transmission network service provider	Pre-operation/Handover • Accept operational responsibilities for the Project in accordance with the agreed handover and regulatory framework. • Prepare, review and implement the OEMP and relevant operational management plans and procedures required under the EMF and EPRs, as applicable. Operation • Operate and maintain the Project in accordance with the applicable transmission licence, statutory approvals, the approved EMF, EPRs and relevant operational plans. • Hold responsibility for operational environmental compliance, monitoring, reporting, complaints management and corrective actions within the operational phase. • Comply with electricity safety obligations, including preparation and implementation of the ESMS, Bushfire Mitigation Plan and electric line clearance requirements, as applicable.

Organisation	Role	Responsibility
		- Manage operational incidents, emergencies, maintenance activities and regulatory reporting obligations relevant to the Project. Decommissioning - If and when decommissioning is required, oversee decommissioning planning and ensure a suitably qualified contractor is engaged to undertake decommissioning in accordance with the EMF, approvals and relevant regulatory requirements.
Independent Environmental Auditor (IEA)	Proponent appointed independent auditor/verifier	Design/Pre-construction - Develop an audit/verification approach and schedule (aligned to approval conditions and Project risk). - Prior to commencement of relevant works, review/verify key contractor plans (e.g. CEMP/management plans) for adequacy against approval conditions and EPRs (where required). Construction - Conduct independent audits/inspections during construction, at agreed intervals, to assess compliance and effectiveness of controls. - Produce audit reports identifying findings, corrective/preventive actions and close-out status, and provide these to the Proponent (and regulators where required) - Six-monthly audit summaries will be provided to the Minister for Planning and be made publicly available on the Project website. Operations and decommissioning - Undertake operational and decommissioning review and assurance where required under EPR-EM02, the audit plan or applicable statutory approval conditions. - Produce audit reports identifying findings, corrective/preventive actions and close-out status, and provide these to the Proponent (and regulators where required) Details of the audit process are provided in Section 28.9.2.
Victorian Minister for Planning	Primary approval authority (planning)	Design/Pre-construction - Consider the EES, submissions and the IAC outcomes, and issue the Minister for Planning's Assessment under the EE Act. - Having considered the Minister's assessment, decide whether, and in what form, to approve the PSA and Incorporated Document (if progressed) under the P&E Act, including any conditions/requirements for the EMF and management plans. - Decide whether to approve documents where required under the Incorporated Document (e.g. EMF, Development Plans and specified management plans).

Organisation	Role	Responsibility
		As relevant, administer and enforce the Incorporated Document as the responsible authority under the planning scheme framework.
Commonwealth Minister for the Environment and Water (or delegate)	EPBC Act decision-maker	Post EES - Having considered the Victorian Minister's accredited assessment under the EE Act, decide whether to approve the controlled action (with/without conditions) or refuse it under the EPBC Act (as applicable). All phases - Administer and enforce EPBC approval conditions, including any monitoring, reporting and management plan requirements. - Receive audit/monitoring reports where required by EPBC conditions.
Registered Aboriginal Party/ies (RAPs) and First Peoples – State Relations (as applicable)	CHMP approval/oversight (<i>Aboriginal Heritage Act</i>)	Post EES - RAP - Evaluate and decide whether to approve CHMP(s) for areas within RAP boundaries and oversee compliance functions as provided under the Aboriginal Heritage Act framework. - First Peoples – State Relations: evaluate and decide whether to approve CHMP(s) for areas where no RAP is appointed, and undertake associated statutory functions. - Participate in consultation processes for CHMP development, implementation and review requirements, as well as ongoing consultation activities as described in Section 28.10.
Energy Safe Victoria (ESV)	Electrical safety regulator	Operation - Accept and oversee the TNSP's Electricity Safety Management System (ESMS) under the <i>Electricity Safety Act 1998</i> and associated regulations. - Monitor and enforce compliance with electrical safety obligations (including bushfire mitigation and line clearance requirements). - Undertake compliance audits/oversight and issue guidance/reporting as applicable.
Australian Energy Regulator (AER) Australian Energy Market Operator (AEMO) Australian Energy Infrastructure Commissioner (AEIC)	Market/consumer oversight bodies (as applicable)	- AER: economic regulation of TNSP obligations (where relevant). - AEMO: power system planning/operational requirements relevant to commissioning/operation (where relevant). - AEIC: community complaints escalation pathway and reporting functions (where relevant).

28.7 Environmental management documentation and statutory effect

Environmental management of the Project would be governed by the Incorporated Document forming part of the draft PSA. The Incorporated Document is proposed to be inserted into Clause 45.12 (Specific Controls Overlay) and Clause 72.04 (Incorporated Documents) of the Gannawarra, Buloke, Loddon and Northern Grampians Planning Schemes. The draft Incorporated Document forms part of the draft Planning Scheme Amendment (PSA) attached to this EES (Attachment I).

The Incorporated Document establishes the statutory framework for the preparation, approval and implementation of key environmental management documentation prior to the commencement of development (or relevant stages or components). This draft document may change having considered information and views presented in submissions.

The final approved Incorporated Document will have statutory effect under the P&E Act and must be complied with in carrying out the Project.

The EMF operates within this statutory framework and the EMF approved by the Minister for Planning may change from the version exhibited in the EES having considered information and views presented in submissions. Together, the Incorporated Document and the EMF establish a clear hierarchy of environmental controls that applies across design, construction, operation and decommissioning.

This hierarchy distinguishes between:

- Level 1: Project Documents - Statutory documents approved or accepted under the Incorporated Document.
- Level 2: The EMS and phase-based management plans required by the EMF.
- Level 3: Plans and procedures required under clause 7.7(f) of the Incorporated Document and the EPRs. These may be incorporated into the CEMP, OEMP or DEMP, or prepared as standalone documents, as specified by the relevant EPR.

The consultation, review, verification, acceptance and approval requirements applying to each Level 3 document are set out in the relevant EPR and applicable statutory approval conditions.

The hierarchy demonstrates that lower-tier documentation must be consistent with higher-order approved or accepted documents. Any potential inconsistency between approval requirements must be escalated and resolved through the relevant approval, governance or change management process before affected works proceed.

Table 28-4 provides a consolidated summary of the Project's environmental management documentation, including preparation responsibilities, review and verification requirements, and statutory approval pathways.

Table 28-4 Environmental management documentation hierarchy and approval pathways

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
Level 1 – Project documents approved under the Incorporated Document					
Development Plans	Clauses 7.1–7.3	Development Plans are those which are defined in the Incorporated Document. They must: • Be generally in accordance with the Map Book exhibited with the EES. • Include details of all Project infrastructure.	VicGrid VNI West (with Principal Contractor input)	VicGrid VNI West (internal review)	Minister for Planning (approval)
EMF	Clauses 7.4–7.8	This is the finalised version of this document. It must: • Include EPRs generally in accordance with the Minister’s Assessment under the EE Act • Set out the process, content and timing for the development of the EMS, CEMP, OEMP and DEMP.	VicGrid VNI West (with Principal Contractor input)	VicGrid VNI West (review)	Minister for Planning (approval)
Native Vegetation Removal Report	Clauses 7.8–7.12	Must set out information about native vegetation, an avoid and minimise statement and the extent of native vegetation removal in accordance with the applicable Guidelines. Biodiversity impacts must be offset in accordance with the Guidelines and evidence of secured offsets provided as required by clauses 7.9–7.12.	VicGrid VNI West (with Delivery Partner/ Principal Contractor input)	DEECA/other relevant authority input, where sought by the Secretary of DEECA	Secretary of DEECA (to the satisfaction of the Secretary)

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
Construction Bushfire Mitigation and Management Plan (CBMMP) and Construction Fire Emergency Management Plan (CFEMP)	Clauses 7.13–7.16	The CBMMP and CFEMP must be submitted prior to commencement of relevant development, prepared in consultation with relevant fire authorities and Councils, and address the applicable requirements of the approved EMF and relevant bushfire EPRs. Relevant fire authorities must be notified before electrical activation in accordance with clause 7.15.	VicGrid VNI West (with Delivery Partner/ Principal Contractor input)	VicGrid VNI West (review) CFA (bushfire input) IEA (verification)	Minister for Planning (approval)
Operational Bushfire Mitigation and Management Plan (OBMMP) and Operational Fire Emergency Management Plan (OFEMP)	Clauses 7.13–7.16	This plan must: • Include the required detail contained in BF03 to manage bushfire risk • Include notification requirements when infrastructure becomes electrically active.	VicGrid VNI West (with Principal Contractor input)	VicGrid VNI West (review) CFA (bushfire input) IEA (verification)	Accepted in accordance with the approved EMF. Clause 7.16 does not specify a separate Ministerial approval step for the operational update.
Workforce Accommodation Plans	Clauses 7.17–7.25	This plan must include: • Site plans; • A workforce accommodation- specific CBFMP; • A workforce accommodation- specific CEMP, OEMP and DEMP; • A workforce accommodation Emergency Management Plan (EMP).	VicGrid VNI West (with Principal Contractor input)	VicGrid VNI West (review) Relevant agencies (e.g. CFA/SES/ Council input as required) IEA (verification)	Minister for Planning (approval)

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
SCO Extent Report	Clauses 7.26-7.27	Must identify Project Land no longer required for the purposes of the Project and include updated SCO maps for inclusion in the Planning Schemes. Must be submitted as soon as practicable and no later than 3 months after registration of all required easements.	VicGrid VNI West	VicGrid VNI West (internal review)	Minister for Planning (approval)
Level 2 – Environmental management system and phase-based management plans					
EMS	EMF requirement	Establishes implementation, monitoring, auditing, incident management and change management processes across all phases.	Principal Contractor (construction); TNSP (operation)	Internal governance; IEA oversight (as applicable)	No separate statutory approval; (must be consistent with approved EMF)
CEMP	Required under EMF/EM03	Implements EPRs during construction Includes the following sub plans: • AQ01 – Dust & Air Quality Management Plan (DAQMP) • AG02 – Biosecurity Management Plans (BMP) • EC04 – Ecological BMP • EC02 - Construction Vegetation and Habitat Management Plan (CVHMP) and Native Vegetation Removal Plan (NVRP) • EC05 - Fauna Management Plan (FMP) • EC06 - Threatened Species Management Plan (TSMP) • GS02 - Saline and Dispersive Soils Management Plan (SDSMP) • GS04 - Acid Sulfate Soil Management Plan (ASSMP)	Delivery Partner/ Principal Contractor	IEA (verification prior to commencement of construction)	Accepted in accordance with the EMF by VicGrid VNI West, unless another statutory approval requirement applies. No separate Ministerial approval is required by the Incorporated Document for the Project-wide CEMP.

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
		- GS05 - Hazardous Materials Management Plan (HMMP) - GS06 - Waste and Contaminated Soil Management Plan (WCSMP) - GW01 - Groundwater Management Plan (GMP) - HH04 - Unexpected Finds Protocol - NV01 - Construction Noise and Vibration Management Plan (CNVMP) - SW01 - Surface Water Management Plan (SWMP)			
OEMP	Required under EMF/EM04	Implements EPRs during operation phase (energised asset). Includes the following sub management plans: - AG02 - Biosecurity Management Plans (BMP) - EC09 - Operational Vegetation and Habitat Management Plan (OVHMP) - GS05 - Hazardous Materials Management Plan (HMMP) - GS06 - Waste and Contaminated Soil Management Plan (WCSMP) - GW01 - Groundwater Management Plan (GMP) - NV03 – Operational Noise Management Plan (ONMP)	TNSP	IEA verification prior to commencement of operation (where required by EMF)	Accepted in accordance with the EMF under TNSP governance arrangements, with VicGrid VNI West pre-handover involvement where relevant. No separate Ministerial approval is required by the Incorporated Document for the Project-wide OEMP.

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
DEMP	Required under EMF/EM05	Implements EPRs during decommissioning. Includes the following sub plans: • AG02 Biosecurity Management Plans (BMP) • BF05 Decommissioning Fire Emergency Management Plan (DFEMP) • NV01 Construction Noise and Vibration Management Plan (CNVMP) • SW01 Surface Water Management Plan (SWMP)	Principal Contractor for decommissioning	IEA or equivalent (as required at time of decommissioning)	Accepted in accordance with the EMF by the TNSP. No separate Ministerial approval is required by the Incorporated Document for the Project-wide DEMF.
Emergency Response Plans	Required under EMF/EM07	EM07 requires a phase-specific emergency response plan for construction, operation and decommissioning	Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning	IEA verification where required under EM02 or applicable statutory approval conditions	Accepted in accordance with the EMF: VicGrid VNI West (construction); TNSP (operation and decommissioning) This does not replace any separate statutory approval requirements applying to Bushfire Management Plans or Workforce Accommodation Plans under the Incorporated Document.
Level 3 – Plans and procedures required under Clause 7.9(e) and the EPRs					

Document and description	Incorporated Document/ EMF reference	Description and key requirements	Prepare	Review/Verify	Approval/ Acceptance
Management plans, including monitoring, auditing and reporting procedures required by the EPRs	Clause 7.7(f); Table 28-6 (EPRs)	Includes other plans required under “General” EPRs such as EM08 (Communications and Stakeholder Engagement Plan) and the Ongoing Traditional Owner Engagement and Communications Plan (EM11). Includes the sub plans listed above which are incorporated into the CEMP, OEMP and DEMP. Includes standalone management plans required by other EPRs such as: • AG01 - Property Management Plans (PMPs) • BF03 – Operations Bushfire Mitigation and Management Plan (OBMMP) • EC07 - Collision Risk Management Plan (CRMP) • EC10 – Understorey Retention and Partial Clearance Plan (URPCP) • EC16 – Culturally Significant Species and Materials Salvage Plan (CSSMSP) • GG01 – Greenhouse Gas Management Plan (GHGMP) • TT01 – Traffic Management Plans (TMPs)	Delivery Partner/Principal Contractor (construction); TNSP (operation and decommissioning) as relevant	IEA verification (construction); internal verification and audit (operation and decommissioning)	Accepted through the relevant CEMP, OEMP or DEMP where incorporated; otherwise reviewed, verified, accepted or approved as specified in the relevant EPR and applicable statutory approval conditions.

Note: “Approval” refers to statutory approval under the Incorporated Document or another applicable approval. “Acceptance” refers to Project governance acceptance of lower-tier documents and does not replace statutory approval. “Review/verification” is an assurance function. “To the satisfaction of” is used where that is the express statutory test.

A current version of the approved or accepted documents listed in Table 28-4, would be made publicly available on a clearly identifiable Project website from the date of their approval or acceptance.

These documents would remain available for at least two (2) years following commencement of operation of the Project, or for such longer period as required by approval conditions. Where documents are updated or amended in accordance with the Incorporated Document or EMF, the most current approved version would be made publicly available.

28.7.1 EMF and management plans

This EMF is the overarching framework that establishes how environmental risks and effects associated with the Project would be managed across all phases, including construction, operation and decommissioning.

This EMF is exhibited as part of the EES. If the PSA is approved, the Incorporated Document would require the EMF to be submitted to the Minister for Planning for approval before any development begins. Once approved, the EMF would have statutory force under the P&E Act. The Project must then be delivered in accordance with the approved EMF.

In this way, the EMF operates as:

- An EES document informing the Minister for Planning's Assessment; and
- A statutory document (once approved) establishing enforceable environmental management requirements for the Project

The EMF sets out the process, content and timing requirements for preparation and implementation of subsequent environmental management documentation, including the plans required in Table 28-4:

Where amendments to the EMF are proposed following EMF approval, they may be submitted to the Minister for Planning for approval in accordance with the Incorporated Document.

28.7.2 Environmental management system (EMS)

The Delivery Partner/Principal Contractor and TNSP would use their respective environmental management systems to manage their Project activities and integrate the requirements of this EMF into their organisational governance processes, with oversight by VicGrid VNI West. Those systems would incorporate, and not replace, applicable requirements of the approved EMF, Development Plans and other approval conditions. The Delivery Partner/Principal Contractor's EMS would be required to be certified to *AS/NZS ISO 14001:2016 Environmental Management Systems* in accordance with the Project's delivery requirements.

The EMS will include processes to flow down applicable EMF, EPR and management plan obligations to the D&C Contractor, subcontractors and other delivery parties, and to maintain auditable records of implementation, monitoring, corrective actions and close-out.

The EMS would:

- Be certified to AS/NZS ISO 14001 Environmental Management Systems
- Incorporate a structured risk management approach consistent with the principles of ISO 31000 Risk Management
- Establish clear roles, responsibilities and accountabilities for environmental management
- Provide processes for training, competence, document control and records management
- Include procedures for incident management, corrective and preventive actions
- Facilitate monitoring, auditing, reporting and continuous improvement

Environmental risk register

A Project environmental risk register would form part of the EMS. The risk register would:

- Use the environmental impact assessment outcomes documented in this EES as its foundation
- Identify environmental risks across construction, operation and decommissioning phases
- Document the approved EPRs and the controls or management requirements developed to implement them, together with any new environmental risks, controls or proposed EPR amendments identified through detailed design
- Be maintained and reviewed throughout Project delivery
- Be updated in response to design development, changes in legislation, construction methodologies, operational practices, incidents, complaints or new information

Reviews of the risk register would evaluate and confirm the ongoing effectiveness of EPRs and the controls established under relevant management plans and in response to approval conditions, and support continuous improvement, including compliance with the GED under the EP Act.

The risk register would directly inform the preparation and refinement of the CEMP, OEMP and DEMP and any associated management plans.

Verification and compliance

In accordance with EPR EM02, relevant management plans would be independently reviewed and verified by the IEA where required under EM02, the audit plan or applicable statutory approval conditions.

Verification would confirm that:

- EPRs have been appropriately translated into specific, measurable, actionable and realistic management controls with timeframes for their implementation
- Monitoring programs and performance indicators are consistent with approval conditions
- Roles, responsibilities and reporting pathways are clearly defined; and
- The plans are consistent with the approved EMF and Development Plans

Ongoing implementation and compliance would be monitored through:

- The EMS and internal governance processes
- Monitoring programs specified in relevant approved or accepted management plans; and
- Independent auditing and reporting arrangements described in Section 28.9

Reporting would be provided to the Minister for Planning and other regulators in accordance with statutory approval conditions.

28.8 Change management

The use and development of the Project Land for the Project must be undertaken generally in accordance with the approved Development Plans and other Detailed Development Documents required under the Incorporated Document.

Development Plans must be submitted to the Minister for Planning for approval prior to commencement of development or any relevant stage or component (excluding preparatory buildings and works) and must be generally in accordance with the Map Book exhibited with this EES. The use and development of the Project Land for the Project must be undertaken generally in accordance with the approved Development Plans. Where the Development Plans submitted propose to locate Project infrastructure within the Additional Area, the Incorporated Document requires an application to be made to the Minister for Planning that:

- Explains why Project infrastructure is proposed to be located within the Additional Area;
- Demonstrates that the location of Project infrastructure in the Additional Area will not give rise to any material increase in adverse impacts compared to the original location within the Project Area;
- Includes any relevant technical assessment prepared by a suitably qualified professional; and
- Includes a summary of any new EPRs that would need to be applied, which must be consistent with the EMF.

Where it is proposed to amend an approved Project Document, the Incorporated Document requires an application to be made to the Minister for Planning that:

- Clearly shows and explains the proposed amendment
- Describes the form and extent of any consultation undertaken concerning the proposed amendment; and
- Includes any written comments from relevant councils, government agencies, Traditional Owner groups and other stakeholders including community groups and business associations

Changes to the Project, including locating Project infrastructure within the Additional Area, will only be proposed in limited circumstances where new information or unforeseen conditions arise that could not reasonably have been identified during the EES, including where there was a lack of land access. These circumstances may include:

- Finalisation of construction methods
- Outcomes of landholder engagement
- Outcomes of geotechnical assessments
- Outcomes of further surveys (e.g. ecological and cultural heritage surveys)
- Unexpected finds during construction; or
- Other site-specific constraints identified during delivery such as biosecurity issues

Any change to the Project outside the Project Land (the land affected by SCO3) would require separate statutory approval that is beyond the scope of this EMF.

28.8.1 Change management through the EMS

Once Development Plans and other Project Documents have been approved, refinements to construction methods, sequencing, work practices or operational procedures during construction, operation or decommissioning may be managed through the EMS, provided those refinements remain within the scope of the approved statutory approvals.

The EMS change management process would:

- Identify and assess proposed changes
- Evaluate consistency with the approved EMF, including EPRs and statutory approval conditions
- Update the environmental risk register as required
- Document the assessment and decision-making process

- Determine whether further statutory notification or approval is required

If the proposed change could create new or significantly greater environmental impacts or is not generally in accordance with the approved Development Plans or in accordance with the approved EMF, it cannot be approved through the EMS alone. Instead, the change must be assessed and approved in accordance with the Incorporated Document, or further statutory approvals must be sought.

This approach ensures that implementation-level refinements are controlled, traceable and verifiable, while maintaining the integrity of the approved EMF.

28.9 Environmental compliance

Environmental compliance for the Project would be achieved through implementation of:

- Statutory approval conditions issued under relevant Commonwealth and Victorian legislation
- The approved EMF and EPRs
- The accepted CEMP, OEMP and DEMP
- Approved Development Plans and other Project Documents
- The EMS

These mechanisms collectively provide the framework for monitoring, auditing, reporting, incident management, complaints management and continuous improvement, consistent with Section 3.6 of the EES Scoping Requirements.

Environmental compliance would be proportionate to environmental risk and would apply across construction, operation and decommissioning phases.

28.9.1 Monitoring measures

Monitoring is a key mechanism for verifying compliance with statutory approvals and assessing compliance with the required outcomes of EPRs and the effectiveness of the controls established under relevant management plans to achieve the environmental outcomes specified by the EPRs.

Monitoring programs would be established through the CEMP, OEMP and DEMP (including sub-plans) to verify compliance with:

- EPRs and the controls established to implement them
- Conditions of statutory approvals
- Applicable legislation

Each monitoring program would define:

- Monitoring objectives
- Parameters and indicators
- Applicable performance criteria or standards
- Monitoring locations and frequency
- Roles and responsibilities
- Reporting requirements
- Trigger thresholds and associated response requirements for corrective action, where applicable

Monitoring would be proportionate to environmental risk and the sensitivity of the receiving environment.

Monitoring activities may include:

- Pre-construction baseline surveys
- Construction compliance inspections
- Operational performance monitoring
- Post-construction rehabilitation monitoring
- Targeted monitoring in response to incidents or complaints

Monitoring data would be recorded and managed through the EMS and retained in accordance with document control procedures.

Where required under statutory approvals or where specified in EPRs, monitoring reports would be provided to regulators. Documents approved under the Incorporated Document would be made publicly available on the Project website in accordance with approval conditions.

Monitoring plans would also consider circumstances in which summaries of baseline and monitoring data may be made available to regulators and the public to support transparency and accountability.

Proposed monitoring requirements are detailed in Table 28-7 in Section 28.12.

28.9.2 Auditing and reporting

Independent auditing would be undertaken to provide assurance that the Project is being delivered in accordance with:

- Statutory approval conditions
- The approved EMF and EPRs
- The accepted CEMP, OEMP and DEMP
- Approved Development Plans and other Project Documents
- Applicable legislative requirements, including the General Environmental Duty under the EP Act

Independent Environmental Auditor

VicGrid VNI West would appoint an Independent Environmental Auditor comprising suitably qualified and experienced personnel to provide independent environmental assurance for the Project. The IEA would undertake construction-phase audits at intervals specified in the audit plan and at least every six months unless otherwise agreed by the relevant approval authority, and would undertake operational or decommissioning review and assurance where required under EM02, the audit plan or applicable statutory approval conditions.

The scope and frequency of independent audits would be documented in the audit plan required by EM02.

The IEA would operate independently of the Principal Contractor and would undertake audits to evaluate:

- Compliance with the EPRs and the requirements of relevant phase-based management plans and sub-plans within the IEA's audit scope
- Compliance with statutory approval conditions issued for the Project and the General Environmental Duty
- Conformance with any other relevant environmental management documentation
- Adequacy and effectiveness of the monitoring programs
- Responses to non-conformances, complaints and incidents

- Compliance with safety requirements

Auditing would include a range of site inspections, observations of Project works, consultations with VicGrid VNI West and the Principal Contractor, reviews of records and meeting minutes as agreed between VicGrid VNI West, the Principal Contractor and the IEA on engagement.

During construction, independent environmental compliance audits would be undertaken at intervals specified in an Audit Plan, prepared by the IEA and approved by VicGrid VNI West, having regard to the scale, complexity and environmental risk of works, and at least every six months.

VicGrid VNI West would then provide six-monthly summary construction audit reports to the Minister for Planning summarising the outcomes of audits conducted by the IEA in the reporting timeframe and the Project's compliance with Project approvals. Following acceptance by the Minister, VicGrid VNI West would make these reports publicly available on the Project website in accordance with statutory approval conditions.

During operation, environmental compliance auditing would be undertaken at intervals proportionate to environmental risk and in accordance with statutory approval conditions and relevant approved or accepted management plans.

Audit findings would inform updates to the environmental risk register and continuous improvement processes, including in relation to meeting ongoing obligations under the GED.

28.9.3 Notifications, incidents and emergencies

Incident and emergency management procedures would be established through the EMS and relevant management plans.

An environmental incident includes an unplanned event, occurrence or action that causes, or has the potential to cause, a material environmental impact, including:

- Damage to native vegetation or protected flora or fauna habitat
- Damage to Aboriginal or historical heritage sites
- Injury or death of fauna
- Oil, chemical, fuel or other contaminant spillages
- Fire/explosions
- Introduction of weeds/pests, quarantine issues or other biosecurity issues
- Uncontrolled discharge of water, including potentially contaminated water, or sediment

VicGrid VNI West and its contractors would comply with statutory notification duties, including those under the EP Act, and any notification requirements under other applicable legislation.

The process for notifications of environmental incidents to the relevant authorities would be contained in the CEMP. Notifications may include:

- Notifications to the registered Aboriginal party and First Peoples – State Relations and Traditional Owner Groups, if a potential Aboriginal site or artefact is identified
- Notification to Heritage Victoria if a heritage artefact is discovered
- Notification to DEECA and/or National EPA (as applicable) if an unexpected threatened species or community is encountered
- Notification to Agriculture Victoria where applicable for biosecurity issues
- Notification to the EPA if notifiable waste and/or contamination is encountered

Incidents, including pollution events that cause or threaten to cause material harm to the environment or human health must be reported to the EPA as required under the EP Act. Other emergencies would also be reported where required to other relevant agencies which may include:

- EPA Victoria
- DEECA
- Heritage Victoria
- Registered Aboriginal Parties, First Peoples – State Relations and Traditional Owner groups as relevant;
- Catchment Management Authorities
- Water authorities
- Emergency services and local councils

The Delivery Partner/Principal Contractor (construction), TNSP (operation) and Principal Contractor for decommissioning would be responsible for implementing incident and emergency response procedures in the event of unexpected environmental events should they arise during construction, operation or decommissioning. Incident management would include:

- Immediate containment and mitigation
- Investigation and root cause analysis
- Implementation of corrective and preventive actions
- Updating of the environmental risk register where required

The Delivery Partner/Principal Contractor would develop and implement the construction-phase emergency response plan required by EM07, integrated with or referenced by the CEMP as appropriate.

28.9.4 Complaints management

VicGrid VNI West would maintain a complaints management process to enable stakeholders and members of the community to raise issues or submit complaints about the proposed Project activities. The complaints management process will be included in the CSEP, CEMP, OEMP and DEMP.

The complaints management framework would:

- Provide accessible and clearly communicated contact mechanisms
- Record and track complaints
- Investigate concerns in a timely manner
- Provide target timeframes for responding to, and resolving, complaints and requirements to respond to complainants where it is not possible to reach a resolution within required timeframe
- Communicate outcomes of investigations
- Implement corrective actions where required
- Consider trends and recurring issues as part of continuous improvement

Complaint records would be maintained through the EMS and, where required under statutory approvals, summaries of complaints and responses would be reported to regulators or made publicly available.

28.10 Community and stakeholder engagement

Ongoing community and stakeholder engagement is a core component of the Project's EMF and is consistent with the requirements of Section 3.6 of the EES Scoping Requirements.

If the Project receives approval through the EES process, VicGrid VNI West would continue engagement throughout construction, operation and decommissioning with:

- Community members
- Landholders
- Local councils
- Relevant government agencies
- Traditional Owners and Registered Aboriginal Parties
- Emergency services and regional stakeholders
- Other affected or interested parties

Engagement would focus on:

- Communicating implementation of approved EPRs, management plans and approval conditions
- Providing advance notice of works and potential impacts
- Seeking input on construction timing, access arrangements and reinstatement matters
- Addressing emerging issues in a timely manner
- Maintaining transparency regarding environmental performance and monitoring outcomes where appropriate

Engagement would be undertaken in accordance with the Project's guiding principles of timeliness, transparency, accessibility and trust.

28.10.1 Engagement framework and implementation

Engagement activities would be guided by a Community and Stakeholder Engagement Plan (CSEP), which as per EPR EM08 would establish:

- Engagement objectives and principles
- Stakeholder identification and mapping
- Communication channels and notification requirements
- Landholder liaison arrangements
- Response timeframes for enquiries and complaints
- Record-keeping and reporting processes

VicGrid VNI West would retain overall accountability for engagement and compliance with statutory consultation requirements.

The Delivery Partner/Principal Contractor would establish a dedicated communication and engagement team responsible for implementing day-to-day engagement activities during construction, including:

- Maintaining regular liaison with landholders
- Coordinating property access
- Managing enquiries and complaints, including trend analysis to identify recurring issues and triggering formal review of relevant management plans, controls and response measures where patterns emerge

- Providing construction notifications in accordance with statutory approvals and management plans.

Engagement activities undertaken by the Principal Contractor must align with the approved EMF, statutory approval conditions and VicGrid VNI West requirements.

28.10.2 Integration with environmental management and compliance

Stakeholder engagement would be integrated with:

- The complaints management process
- Incident notification procedures
- Development Plan refinements and change management processes
- Monitoring and auditing programs

Feedback from stakeholders would inform updates to management plans, controls and the environmental risk register, management plans and the environmental risk register where appropriate. The mechanisms for achieving this would be outlined in the CSEP.

Where required under statutory approvals, summaries of engagement activities and complaints would be reported to regulators and may be made publicly available.

28.10.3 Traditional Owner engagement

Engagement with Traditional Owners and Registered Aboriginal Parties (RAPs) would continue throughout construction, operation and decommissioning in accordance with EM11.

Governance and statutory framework

CHMPs prepared for the Project establish the statutory framework for protection and management of Aboriginal cultural heritage.

Where a Registered Aboriginal Party (RAP) has been appointed for part of the Project Area, the RAP is responsible for evaluating and approving the CHMP for that area and may exercise ongoing statutory functions under the *Aboriginal Heritage Act 2006*.

For areas where no RAP has been appointed, First Peoples – State Relations (FPSR) performs the relevant statutory functions under the Act, including approval of CHMPs.

Construction activities must be undertaken in accordance with approved CHMPs. No works may commence in an area until the relevant CHMP has been approved by the RAP or FPSR (as applicable).

VicGrid VNI West would retain overall accountability for ensuring compliance with CHMP conditions and cultural heritage management obligations. The Principal Contractor would be responsible for implementing CHMP requirements within its scope of works.

Ongoing engagement across Project phases

Ongoing engagement with Traditional Owners would include, as relevant to the Project phase:

- Implementation of the engagement arrangements established under EM11
- Implementation of CHMP requirements, including agreed cultural heritage protection measures
- Consultation with RAPs or FPSR (as applicable) regarding management of culturally sensitive areas

- Consultation on the implementation of EPRs
- Consultation on the management and outcomes of the cultural values assessment
- Involvement of RAP representatives or approved cultural heritage monitors where required under CHMP conditions
- Communication of construction schedules and activities that may affect cultural heritage values, unexpected finds and heritage protection

Procedures for managing unexpected finds of Aboriginal cultural heritage would be implemented in accordance with:

- Approved CHMPs
- The Aboriginal Heritage Act 2006
- The approved CEMP

If previously unidentified Aboriginal cultural heritage is discovered during construction:

- Works in the vicinity would cease
- The relevant RAP or FPSR (as applicable) would be notified in accordance with statutory requirements
- Management actions would be agreed prior to recommencement of works

Integration with environmental management

Traditional Owner engagement would be integrated with:

- EPRs which require Traditional Owner consultation and engagement, including EM11, EM12, EM14 and relevant ACH EPRs in Table 28-6
- Environmental incident management procedures
- Complaints management processes
- Change management processes where relevant to location refinements;
- Monitoring and reporting obligations under statutory approvals

Engagement outcomes may inform refinement of EPRs and updates to management plans where appropriate.

28.11 Environmental Performance Requirements (EPR)

This section sets out the EPRs that define the environmental performance standards for the Project. The full list of EPRs is provided in Table 28-6.

The EPRs form a mandatory and enforceable component of the EMF. They establish the environmental outcomes that must be achieved during detailed design, construction, operation and decommissioning of the Project. Compliance with the EPRs is required through the Incorporated Document and other statutory approvals, and is subject to monitoring, audit and regulatory oversight.

In response to experience from recent Victorian transmission projects, the EPRs have been structured as an integrated and traceable set of performance standards. Each EPR clearly identifies:

- The project phase to which each requirement applies
- The management plan(s), procedure or implementation mechanism through which it must be implemented
- Monitoring, verification and reporting requirements

- The responsible party accountable for implementation and compliance

This structure ensures clarity of obligation, line of sight between approval and implementation, and enforceability across all stages of the Project.

28.11.1 Role of EPRs

The Project proposes EPRs to address the potential impacts identified in the EES so that the risks to human health and the environment are avoided or minimised to the extent reasonably practicable.

Together with statutory approval conditions, EPRs establish the mandatory environmental outcomes that must be achieved during detailed design, construction, operation and decommissioning of the Project.

The EPRs establish the required environmental performance outcomes. Many are expressed as performance-based, allowing flexibility in the methods, design responses or implementation pathways used to achieve those outcomes. This flexibility does not apply to the environmental standards or performance outcomes themselves.

Some EPRs contain a greater level of implementation detail where the required controls are already sufficiently understood and implementable at the EES stage.

Some EPRs require management plans, including the CEMP, OEMP, DEMP and other plans specified in Table 28-6. These plans are implementation mechanisms that specify the controls, procedures and monitoring required to achieve the relevant EPRs. Where an EPR requires a management plan or other implementation document, that plan or document must be prepared, reviewed and/or approved or accepted where required, and implemented in accordance with the relevant EPR, this EMF and any applicable statutory approval conditions.

Each EPR specifies when it is triggered, who is responsible for implementation, how verification will be conducted and at what phase(s) in the Project life-cycle it is relevant. Where a plan, document or verification process requires review, acceptance or approval by a particular authority or reviewer, that role must be identified in the relevant EPR, EMF process or statutory approval condition. VicGrid VNI West may review documentation for project governance or contractual purposes, but this does not replace any statutory review, approval or independent verification required under the EMF or statutory approvals.

Lower-tier documentation must be consistent with and give effect to the approved EMF, EPRs and statutory approval conditions. If a potential inconsistency is identified between approval requirements, the matter must be escalated and resolved through the relevant approval, governance or change management process before works proceed in a manner that may be affected by the inconsistency.

Where an EPR requires site-specific, location-specific or property-specific assessment or documentation, that requirement must be satisfied before the relevant works commence in the area to which the requirement applies.

Site-specific, location-specific and property-specific requirements refine and implement project-wide EPRs. They may apply to all or part of a land parcel, property, road reserve, waterway, public land area, work site, access route or other location affected by the Project. They do not replace, weaken or override project-wide EPRs, the approved EMF or applicable statutory approval conditions. Any such documentation must demonstrate consistency with the approved EMF, relevant EPRs and applicable statutory approval conditions, and is subject to review and verification in accordance with this EMF.

This approach provides certainty that the required environmental outcomes of the EPRs are approved as part of the EMF approval, while allowing site-specific implementation to be appropriately tailored prior to construction.

28.11.2 Refinement during detailed design

Given the scale and linear nature of transmission infrastructure, aspects of detailed design are progressively refined following the EES process. Where full design resolution is not available at the EES stage, EPRs have been developed which require further investigation, technical assessment, design response and/or the development of management plans prior to construction.

This staged approach does not defer environmental performance standards. The EPRs in the EMF would be finalised and approved through the relevant statutory process. The actions, plans, design solutions and implementation measures needed to achieve those EPRs may then be finalised through subordinate plans, detailed design, secondary approvals and other implementation processes.

Any design refinement must remain within the approved environmental performance envelope, obtain relevant secondary approvals where required and be managed in accordance with the change management framework described in Section 28.8.

28.11.3 Consultation requirements

Some EPRs require consultation with Traditional Owners, Registered Aboriginal Parties (RAPs), First Peoples – State Relations, regulators, councils, asset managers, landholders or other relevant stakeholders. Consultation requirements are included where input is necessary to refine design, confirm management measures, address site-specific sensitivities or meet statutory obligations.

Where consultation is required under an EPR:

- The relevant stakeholder group(s) are identified in the EPR
- The stage at which consultation must occur (e.g. prior to finalising a management plan or prior to works commencing on a property) is identified in the relevant EPR or applicable statutory approval condition
- The consultation process and outcomes must be documented
- Feedback received must be considered in good faith and, where it would assist in achieving the relevant EPR outcome and is safe, lawful, technically feasible and proportionate, incorporated into design or management documentation
- Where feedback is not adopted, the reasons must be recorded, including how stakeholder input, statutory obligations, EPR outcomes, safety, environmental, social and cultural benefits, technical constraints and project delivery implications were considered
- Evidence of consultation and its outcomes is subject to independent review and audit where required under the EMF or statutory approval conditions

Consultation activities may include meetings, workshops, technical briefings, site inspections, exchange and review of documentation, and written correspondence, as appropriate to the matter being addressed.

Importantly, consultation requirements refine and inform the implementation of EPRs; they do not displace or reduce the environmental performance standards established through this EMF. Where statutory approvals require consultation with specific parties including under the EPBC Act, *Aboriginal Heritage Act 2006*, EP Act or approval conditions, those statutory processes prevail and are incorporated into the relevant management documentation.

This approach ensures that consultation is structured, transparent, and accountable, while maintaining clear and enforceable environmental performance obligations.

Table 28-5 identifies the key plans, strategies and implementation documents required by the EPRs that include specific consultation requirements. The table is a summary and is not intended to replace the consultation requirements in individual EPRs. Where an EPR specifies consultation with a particular party, that requirement applies even if the plan or document is not listed in this table.

Table 28-5 Plans, strategies and implementation documents with consultation requirements

Plan, strategy or implementation document	Relevant EPRs	Consultation requirement
Communications and Stakeholder Engagement Plan	EM08	Landholders, Traditional Owners, Registered Aboriginal Parties, First Peoples – State Relations, councils, regulators, asset managers, community members and other relevant stakeholders, as relevant to the matter being addressed
Ongoing Traditional Owner Engagement and Communications Plan(s)	EM11	Relevant Traditional Owner groups and Registered Aboriginal Parties, as applicable, in accordance with EM11
Construction Environmental Management Plan	EM03/relevant construction-phase EPRs	As required by relevant EPRs and statutory approval conditions, including consultation with relevant regulators, councils, landholders, Traditional Owners, asset managers or other stakeholders where required
Operational Environmental Management Plan	EM04/relevant operation-phase EPRs	As required by relevant EPRs and statutory approval conditions, including consultation with relevant regulators, councils, asset managers, landholders or other stakeholders where required
Decommissioning Environmental Management Plan	EM05/relevant decommissioning-phase EPRs	Relevant regulators, councils, landholders, asset managers and other stakeholders at the time of decommissioning, as required by the relevant EPRs and statutory approval conditions
Emergency management, incident response or emergency preparedness procedures	EM07, BF EPRs and other relevant EPRs	Relevant emergency service authorities, councils, asset managers and regulators, where required
Cultural Heritage Management Plans and Aboriginal cultural heritage management documentation	ACH EPRs	Relevant Registered Aboriginal Parties, Traditional Owner groups, First Peoples – State Relations and landholders, as required under the <i>Aboriginal Heritage Act 2006</i> , approved CHMPs and relevant EPRs
Cultural awareness, Aboriginal cultural heritage induction or training requirements	ACH EPRs/EM14	Relevant Registered Aboriginal Parties, Traditional Owner groups and First Peoples – State Relations, where required

Plan, strategy or implementation document	Relevant EPRs	Consultation requirement
Ecology management plans, protocols or procedures, including vegetation, habitat, fauna, threatened species and collision risk management documentation	EC EPRs	DEECA, National EPA where relevant to Matters of National Environmental Significance, relevant land managers, Traditional Owners, councils or other stakeholders as required by the relevant EPRs and statutory approval conditions
Culturally significant species or materials salvage protocols, where required	EC EPRs/ACH EPRs	Relevant Traditional Owner groups, Registered Aboriginal Parties and First Peoples – State Relations, where required
Groundwater management plan or groundwater management procedures	GW EPRs	Relevant water authorities, regulators, landholders and other stakeholders where required
Surface water management plan or surface water management procedures	SW EPRs	Relevant catchment management authorities, water authorities, councils, land managers and regulators where required
Traffic Management Plans	TT01	Responsible road authorities, councils, school bus operators, public transport operators, emergency services, landholders and other relevant stakeholders where required
Road condition, dilapidation, monitoring and rectification/restoration processes	TT04	Responsible road authorities, councils, asset managers and affected landholders where required
Business Mitigation and Support Strategy	BE01	Affected businesses, councils and other relevant stakeholders, where the business agrees to engage with the Project
Local procurement and business participation plan	BE02	Local councils, local businesses, social enterprises, relevant Traditional Owner groups and enterprises, Aboriginal-owned businesses and other relevant stakeholders
Tourism Mitigation and Support Strategy	BE03	Local councils, relevant Victorian Government departments, tourism industry peak bodies and other relevant tourism or visitor economy stakeholders
Social Value Strategy	SC01	Councils, Traditional Owners, community organisations and other relevant stakeholders where required

Plan, strategy or implementation document	Relevant EPRs	Consultation requirement
Local Workforce Development Strategy	SC07	Local councils, training and employment providers, Traditional Owner groups and enterprises, Aboriginal-owned businesses, social enterprises and other relevant stakeholders
Landscape and visual management measures or property-specific visual mitigation documentation	LV EPRs	Affected landholders, businesses, councils, public land managers and other relevant stakeholders where required
Noise and vibration management procedures, where consultation is required by the relevant EPRs	NV EPRs	Affected sensitive receptors, landholders, councils and regulators where required
Air quality management procedures, where consultation is required by the relevant EPRs	AQ EPRs	Affected sensitive receptors, landholders, councils and regulators where required

The extent and method of consultation will be documented as a means of demonstrating compliance with the relevant EPRs. This documentation must identify who was consulted, the matters raised, how feedback was considered, and how that feedback was incorporated into the relevant plan, strategy or implementation document where required. Where feedback is not adopted, the reasons must be recorded in accordance with the consultation requirements set out above.

28.11.4 Verification and enforcement

Implementation and compliance responsibilities are identified in each EPR. Independent review and auditing will be undertaken in accordance with EM02 and Section 28.9.2, together with any additional verification requirements identified in individual EPRs or statutory approvals. Non-compliance must be addressed through the corrective action and reporting processes established under this EMF.

28.11.5 Structure of the EPRs

The proposed EPRs are grouped by discipline in Table 28-6 as follows:

- Environmental management/general (EM)
- Aboriginal cultural heritage (ACH)
- Agriculture (AG)
- Air quality (AQ)
- Aviation (AV)
- Bushfire (BF)
- Business and economics (BE)
- Climate change (CC)
- Ecology (EC)
- Electric and magnetic field and electromagnetic interference (EMFI)
- Geology and soils (GS)
- Greenhouse gas (GG)
- Groundwater (GW)
- Historical heritage (HH)
- Landscape and visual (LV)
- Noise and vibration (NV)
- Social (SC)
- Surface water (SW)

- Traffic and transport (TT)

No standalone land use and planning EPRs have been developed. This is because land use and planning impacts are addressed through the PSA process, including Development Plan requirements, and through other discipline-specific EPRs relating to design refinement, property management, access, traffic and transport, agriculture, ecology, cultural heritage and reinstatement.

EPRs form an integrated and enforceable environmental performance framework. The framework has been deliberately structured to ensure:

- Clear hierarchy between the EMF, EPRs and management plans
- Explicit identification of implementation responsibility and applicable project phase
- Defined triggers and timing for any property-specific requirements
- Traceability between environmental outcomes, management controls and monitoring mechanisms
- Enforceability through statutory approval conditions and independent verification

Grouping the EPRs by discipline provides navigational clarity only. The EPR framework operates as a single, integrated system. Individual requirements do not operate in isolation and must be implemented consistently across relevant disciplines, management plans and Project phases.

EPRs apply at different Project phases, as identified in Table 28-6. For example, access track design and location requirements apply during detailed design and pre-construction, while establishment and maintenance of construction no-go zones occurs prior to and during construction.

For the purposes of the EPRs the general Project phases are defined as:

- Design – Detailed design is conducted and Project approvals are sought
- Pre-construction phase – Once approvals have been received – includes the implementation of approval conditions to allow construction to commence and pre-clearance surveys/studies
- Construction – Approximately 3.5 years
- Operation - Approximately 50 to 100 years
- Decommissioning – End of operational phase

Responsibilities in the EPR Table 28-6 are expressed by functional Project role. Where activities are undertaken by a D&C Contractor, subcontractor or other delivery party, the Delivery Partner/Principal Contractor is responsible for ensuring that the applicable EPR obligations within its delivery scope are appropriately flowed down and implemented.

Unless otherwise specified in an EPR, verification may include relevant plans and assessments, implementation and inspection records, monitoring results, incident and corrective action records, and audit findings. The Monitoring and verification column identifies EPR-specific verification requirements and key evidence of compliance.

Table 28-6 Environmental Performance Requirements

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
General					
EM01	Environmental Management Framework (EMF) and Environmental Management System (EMS) VicGrid VNI West will finalise the EMF having regard to the Minister for Planning's Assessment and applicable statutory approval requirements. The Delivery Partner/Principal Contractor and TNSP, as applicable to the relevant Project phase, will develop, implement and maintain an Environmental Management System to support implementation of the approved EMF. The EMS will be certified to AS/NZS ISO 14001 Environmental Management Systems – Requirements with guidance for use, or any superseding equivalent standard adopted for the Project.	Project-wide. Triggered prior to construction and applies throughout all project phases.	Prepare: VicGrid VNI West (EMF) Prepare/implement: Delivery Partner/Principal Contractor; TNSP, as applicable to the relevant phase (EMS) Approve: Minister for Planning, where applicable to the EMF	Final EMF; EMS documentation audit/verification records	All phases
EM02	Independent Environmental Auditor (IEA) Prior to the commencement of construction, VicGrid VNI West will appoint an Independent Environmental Auditor to provide independent environmental assurance for the Project. The Independent Environmental Auditor will be independent of the activities being audited and will include suitably qualified and experienced personnel with expertise appropriate to the environmental impacts and activities being audited. The lead auditor must be supported by a range of technical specialists with relevant expertise across the key issues including, but not limited to, ecology, land use, agriculture, Aboriginal cultural heritage. The Independent Environmental Auditor will:	Project-wide. Appointment triggered prior to construction. Audits to occur during construction at least every six months; Operation where required.	Appoint: VicGrid VNI West Implement: IEA Support/comply: VicGrid VNI West; Delivery Partner/Principal Contractor, as relevant to audit findings	IEA appointment; audit plan; plan review and audit reports; corrective action close-out records	Pre-construction; Construction; Operation where required; Decommissioning where required

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Review the EMS, CEMP and other construction-phase plans required by the EPRs for consistency with the approved EMF, EPRs and applicable statutory approval conditions - Undertake environmental compliance audits during construction at intervals specified in the audit plan, and at least every six months unless otherwise agreed by the relevant approval authority - Review implementation of relevant operational and decommissioning plans where required by the EMF, statutory approval conditions or the audit plan - Prepare audit reports identifying findings, corrective actions and recommendations for ongoing compliance - Verify close-out of corrective actions where required. The frequency and scope of audits will be proportionate to the scale, complexity and environmental risk of the activities being audited and will be documented in an audit plan.				
EM03	Construction Environmental Management Plan (CEMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a CEMP in accordance with this EMF to manage the environmental impacts associated with construction in accordance with the EMF and the avoidance and minimisation approach embedded in the EPRs.	Project-wide. Required prior to commencement of construction and implemented throughout construction.	Prepare/implement: Delivery Partner/Principal Contractor Independent review/verification: IEA where required under EM02 Accept: VicGrid VNI West, unless another approval authority is specified by a statutory approval condition	CEMP; IEA review records where required; training/induction records; monitoring, incident and corrective action records	Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The CEMP will be prepared having regard to applicable legislative requirements relevant to construction environmental management, statutory approval conditions and the EPRs. The CEMP will be developed in consultation with relevant stakeholders where consultation is required by the relevant EPRs or statutory approval conditions. The CEMP will be reviewed by VicGrid VNI West and reviewed and verified by the Independent Environmental Auditor for consistency with the approved EMF, EPRs and applicable statutory approval conditions prior to the commencement of construction. The CEMP will include, at a minimum: • construction sub-plans required under this EMF • relevant legislative and approval requirements relevant to construction environmental management • induction and training requirements • inspection, monitoring, maintenance, auditing and reporting processes • procedures for identifying non-compliances and implementing corrective actions • incident notification and management procedures • contingency and response measures • complaints management and response procedures • emergency preparedness and response arrangements • requirements for baseline condition records to be prepared before disturbance or use of relevant construction areas, including laydown areas, workforce accommodation areas, terminal station and reactor station footprints, access tracks and other areas where construction or operational use may give rise to contamination or land condition changes				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- requirements for baseline condition records, incident records, contamination assessment records, rehabilitation records and close-out records to be retained and made available to inform reinstatement, asset handover, operation, maintenance and future decommissioning planning where relevant - review and continual improvement processes.				
EM04	Operational Environmental Management Plan (OEMP) Prior to the commencement of operation, the TNSP will develop and implement an OEMP in accordance with this EMF to manage the environmental impacts associated with operation and maintenance of the Project. The OEMP will be prepared in consultation with relevant stakeholders where required by the relevant EPRs or statutory approval conditions. The OEMP will be reviewed and accepted in accordance with the EMF, including independent verification where required under EM02 or statutory approval conditions, before operation commences. The OEMP will include, at a minimum: - operational sub-plans required under this EMF - relevant legislative and approval requirements - induction and training requirements - inspection, monitoring, maintenance, auditing and reporting processes - procedures for identifying non-compliances and implementing corrective actions - incident notification and management procedures - contingency and response measures - complaints management and response procedures - emergency preparedness and response arrangements	Project-wide. Triggered prior to operation.	Prepare/implement: TNSP Accept: TNSP governance arrangements; VicGrid VNI West pre-handover where relevant	OEMP; monitoring records; incident and corrective action records	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- operational EMFI management procedures, where relevant, including processes to maintain compliance with applicable legislation, regulatory requirements and relevant EMFI exposure guidelines, including guidance published by ARPANSA and informed by ICNIRP, as applicable - procedures for assessing operational modifications to the transmission network within the Project area that have the potential to materially alter EMFI levels, and updating relevant operational procedures or management measures where required - review and continual improvement processes.				
EM05	Decommissioning Environmental Management Plan (DEMP) Prior to the commencement of decommissioning, the TNSP will ensure a Principal Contractor for decommissioning develops and implements a Decommissioning Environmental Management Plan (DEMP) in accordance with this EMF to manage the environmental impacts associated with decommissioning. The DEMP will be prepared having regard to applicable legislative requirements, statutory approval conditions, relevant standards and good practice applicable at the time of decommissioning, and the EPRs. The DEMP will be prepared in consultation with relevant stakeholders where required by the relevant EPRs or statutory approval conditions. The DEMP will include, at a minimum: - decommissioning sub-plans required under this EMF - relevant legislative and approval requirements - consideration of circular economy principles including requirements for reuse, recycling and recovery of materials where reasonably practicable - induction and training requirements	Project-wide. Triggered prior to decommissioning.	Prepare/implement: Principal Contractor for decommissioning Accept: TNSP	DEMP; monitoring records; incident and corrective action records	Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- inspection, monitoring, maintenance, auditing and reporting processes - procedures for identifying non-compliances and implementing corrective actions - incident notification and management procedures - contingency and response measures - complaints management and response procedures - emergency preparedness and response arrangements - rehabilitation, reinstatement and review requirements - review and continual improvement processes.				
EM06	Access Tracks and Access Planning During detailed design and prior to the commencement of construction, the Principal Contractor will identify and assess access track routes from public roads to the Proposed Easement and within the easement, in consultation with landholders, relevant specialists and Traditional Owners/RAPs where relevant, to avoid and minimise environmental, heritage, land use, agricultural productivity and safety impacts to the extent reasonably practicable. For both temporary and permanent access tracks, the assessment of proposed routes will consider, at a minimum: - ecological values, including wetlands, large trees, native vegetation, threatened ecological communities and threatened flora and fauna habitat - known Aboriginal cultural heritage values and areas of cultural heritage sensitivity and outcomes of relevant CHMP/cultural heritage assessment processes where available - known historical heritage values	Property-specific/location-specific. Triggered where access tracks are required during detailed design and access planning.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West for supporting design records Approve: Minister for Planning, where required through Development Plan approval	Development Plan approval; supporting assessment records	Design; Pre-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• agricultural production values, including crop areas, grazing systems, paddock layout, farm access, machinery movement, irrigation infrastructure and farm operations • use of existing disturbed areas, existing tracks, temporary access options or other lower-disturbance access methods where practicable • steep slopes, poor drainage and flood risk • stream and water crossings • landholder operations and separation from farm residences • other relevant property-specific constraints. Where impacts cannot be avoided, routes will be further refined or micro-sited, where practicable, to minimise impacts. Any additional vegetation removal will be incorporated into relevant offset requirements. Final access track locations will be incorporated into the Development Plan, with supporting assessments demonstrating how this EPR has been applied.				
EM07	Emergency Response Plans Prior to the commencement of construction, operation and decommissioning, the relevant delivery entity will develop and implement an emergency response plan for that phase to minimise, so far as reasonably practicable, risks to personnel, the public, equipment and Project infrastructure. Each emergency response plan will be prepared in consultation with relevant emergency service authorities and will include, at a minimum: • hazard identification and assessment • communication systems and notification procedures • training and competency requirements • procedures for responding to relevant emergency scenarios	Project-wide. Triggered prior to each project phase.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Accept: VicGrid VNI West for construction; TNSP for operation and decommissioning	Emergency response plans; training and incident records	Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- relevant bushfire, flood, spill and hazardous materials response measures - interfaces with discipline-specific response procedures, including biosecurity incident response procedures under AG02 where relevant - procedures for notifying affected landholders, businesses or agencies where an emergency or incident may affect property access, agricultural operations, livestock, crops, water supply or biosecurity status - distinction between operational notifications to neighbours, emergency services and other stakeholders, and statutory notification duties under applicable legislation - post-incident follow-up and review procedures.				
EM08	Communications and Stakeholder Engagement Plan (CSEP) Prior to the commencement of construction, VicGrid VNI West will develop and implement a Communications and Stakeholder Engagement Plan (CSEP) to guide project communication and engagement during construction, operation and decommissioning, with the level of engagement proportionate to the nature and intensity of Project activities during each phase. The CSEP will be reviewed and updated prior to the commencement of operation and decommissioning, and as otherwise required, to ensure it remains relevant and appropriately tailored to the Project phase. The CSEP will be prepared in consultation with relevant councils and be consistent with the International Association for Public Participation (IAP2) core values. The CSEP will include, at a minimum: engagement principles and objectives	Project-wide. Triggered prior to construction.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor for relevant work packages; TNSP where relevant during early operation Accept: VicGrid VNI West	CSEP; engagement and review/update records	Pre-construction; Construction; Operation and decommissioning where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• identification of relevant stakeholders and their likely interests in the Project • communication and engagement tools for timely provision of project information including Project purpose, objectives and benefits, and updates on environmental compliance • processes for providing advance notice of works and likely impacts of such works • processes and mechanisms for affected stakeholders to provide feedback on matters relevant to them, and for that feedback to be considered and, where appropriate, incorporated into relevant Project plans, procedures and decision-making processes • interfaces with consultation requirements under other EPRs • procedures for review, monitoring and update of the CSEP, including prior to each Project phase and in response to, but not limited to, stakeholder and community feedback and complaints. VicGrid VNI West will maintain a single, consistently accessible community liaison function for affected communities throughout construction and for operation and decommissioning where Project activities may affect landholders, councils or communities, regardless of contractor or personnel changes.				
EM09	Complaints Management System Prior to the commencement of construction, VicGrid VNI West will develop and implement a complaints management system as part of the CSEP to record, manage and resolve complaints from affected stakeholders.	Project-wide. Triggered prior to construction.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP, as relevant Accept: VicGrid VNI West	Complaints register; response and close-out records	Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The system will be consistent with AS/NZS 10002 Guidelines for complaint management in organisations and the Essential Services Commission Land Access Code of Practice. The system will include, at a minimum: • complaint recording requirements • investigation and response procedures • target response and resolution timeframes • escalation requirements, including escalation of recurring, unresolved or high-risk complaints • procedures for reporting back to complainants where resolution is delayed • close-out procedures • a process for identifying whether a complaint indicates potential non-compliance with an EPR, statutory approval condition, management plan or property-specific requirement • a process for referring potential non-compliances, recurring issues or systemic issues into the Project's assurance, corrective action and change management frameworks. Where complaints relate to Traditional Owner engagement, Aboriginal cultural heritage or Traditional Owner interests, the complaint will be managed having regard to EM11 and relevant ACH EPRs.				
EM10	Publication of Key Project Information VicGrid VNI West will make key project information publicly available on the Project website during construction and for at least two years after commencement of first operation. This will include, at a minimum: • approved plans or documents required to be published	Project-wide. Triggered during construction and continuing into early operation.	Prepare/implement: VicGrid VNI West	Published documents and map; update records	Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- a current interactive or equivalent map of key project infrastructure - audit summary reports approved for public release - relevant communication and engagement plans - contact details and communication pathways for Project community liaison staff.				
EM11	Ongoing Traditional Owner Engagement and Communications Prior to the commencement of construction on the Country of the relevant Traditional Owner group, VicGrid VNI West will develop and implement an ongoing Traditional Owner Engagement and Communications Plan(s), in consultation with the relevant Traditional Owner groups, to support participation, communication and continuous improvement during detailed design, construction, operation and decommissioning. The plan(s) will be developed having regard to relevant leading practice principles, including the <i>Leading Practice Principles: First Nations and Renewable Energy Projects</i> prepared by the Clean Energy Council and KPMG, as updated from time to time. The plan(s) will include, at a minimum: - the agreed engagement approach with each relevant Traditional Owner group - processes for providing regular Project updates to Traditional Owner groups - Information sharing protocols to support Free, Prior and Informed Consent, including processes for providing relevant Project information in a timely, accessible and culturally appropriate manner	Project-wide, with Traditional Owner group-specific application. Triggered prior to relevant detailed design activities on the Country of the relevant Traditional Owner group and continuing through construction, operation and decommissioning where relevant.	Prepare/implement: VicGrid VNI West Consult: relevant Traditional Owner groups Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant	Engagement plan(s); engagement/Traditional Owner input records; incident/non-compliance notifications where relevant; review/update records	Design; Pre-construction; Construction; Operation; Decommissioning where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- processes for supporting Traditional Owner participation in relevant EPRs, management plans and monitoring plans where those matters relate to protection, management or enhancement of environmental, cultural or Country values - processes for consultation on design refinement, access planning, vegetation management, rehabilitation, monitoring and other matters relevant to Traditional Owner interests - processes for notifying and engaging with Traditional Owner groups in relation to relevant incidents, non-compliances or unexpected finds - processes for identifying opportunities for improvement and for updating the plan over time - record-keeping, reporting and dispute resolution processes.				
EM12	Traditional Owner participation and partnership VicGrid VNI West will work with relevant Traditional Owner Corporations and Traditional Owner groups to establish structured advisory and partnership mechanisms to support ongoing participation in the Project and, where relevant, broader participation in the energy transition. This will include exploring partnership opportunities with Traditional Owners to support long-term socio-economic and cultural outcomes, including but not limited to opportunities relating to: - capacity building - Indigenous procurement - employment, education and training - land management and caring for Country - cultural values and cultural knowledge initiatives - housing and community development	Project-wide. Triggered during detailed design and continuing through construction and operation, in consultation with relevant Traditional Owner Corporations.	Prepare/implement: VicGrid VNI West Support: Delivery Partner/Principal Contractor; TNSP where relevant	Engagement and partnership framework records; opportunities and outcomes records	Design; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	other opportunities identified through engagement with relevant Traditional Owner groups. Where opportunities relate to procurement or social value initiatives, they will be coordinated with BE02 and SC01 to avoid duplication and support clear implementation pathways.				
EM13	Land Use Activity Agreements VicGrid VNI West will undertake Land Use Activity Agreement negotiations, where required under the <i>Traditional Owner Settlement Act 2010</i>, for publicly held land parcels affected by the Project within relevant Land Use Activity Areas. Negotiations will be undertaken with each relevant Traditional Owner Corporation for land within its Recognition and Settlement Area, in accordance with the requirements of the <i>Traditional Owner Settlement Act 2010</i> and any applicable settlement agreement.	Site-specific. Triggered where Project activities affect publicly held land within a Land Use Activity Area under the <i>Traditional Owner Settlement Act 2010</i>, within the Recognition and Settlement Area of the relevant Traditional Owner Corporation.	Prepare/implement: VicGrid VNI West Support: Delivery Partner/Principal Contractor where relevant	LUAA negotiation records; agreements/determinations; statutory correspondence	Design; Pre-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EM14	Training and awareness for Project personnel Prior to the commencement of construction, VicGrid VNI West will develop and implement training and awareness requirements for Project personnel, including personnel undertaking direct community engagement activities for the Project and construction personnel. The training and awareness requirements will include: • anti-racism training for Project personnel • cultural awareness training for Project personnel, developed in consultation with, or endorsed by, the relevant Traditional Owner groups • awareness of potential psychological and wellbeing stress associated with Project engagement, and information on how to refer stakeholders to available support resources, for personnel undertaking direct community engagement activities • additional cultural competency training for personnel undertaking direct community engagement activities, or roles involving direct engagement with Traditional Owner groups or Aboriginal cultural heritage matters, delivered by the relevant Traditional Owner groups, or providers endorsed by the relevant Traditional Owner groups, on whose Country the relevant activities are taking place.	Project-wide, with Traditional Owner group-specific application for cultural awareness and cultural competency training. Triggered prior to construction and before relevant personnel undertake the activities to which the training applies. Additional cultural competency training applies before relevant personnel undertake direct engagement activities, or works requiring direct engagement with Traditional Owner groups, First Nations stakeholders or Aboriginal cultural heritage matters on the Country of the relevant Traditional Owner group.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant Deliver/endorse: relevant Traditional Owner groups or providers endorsed by relevant Traditional Owner groups	Training framework and materials; attendance/refresher records; Traditional Owner endorsement records where relevant	Pre-construction; Construction; Operation where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Training will be completed before relevant personnel undertake the activities to which the training applies. Refresher training will be provided at least every 12 months during construction, where the relevant personnel continue to undertake the activities to which the training applies. Anti-racism training will also be refreshed every 12 months for personnel undertaking direct community engagement activities for a period of two years following completion of construction. Additional cultural competency training will be provided before relevant personnel undertake direct engagement or works requiring direct engagement with Traditional Owner groups, First Nations stakeholder or Aboriginal cultural heritage matters on the Country of the relevant Traditional Owner group and refreshed every 12 months while those activities are occurring on that Country.				
EM15	Inclusive Employment Initiatives Prior to the commencement of construction, VicGrid VNI West will develop and implement inclusive employment initiatives to maximise employment opportunities associated with the Project for First Nations people, apprentices, trainees, people with disability, women, young people, and vulnerable and disadvantaged groups. The initiatives must be developed in consultation with relevant Traditional Owner groups, councils, and other stakeholders, and must be documented in, and implemented in alignment with, the Local Workforce Development Strategy required by EPR-SC05. Where initiatives relate to Traditional Owner participation, partnership opportunities or broader socio-economic and cultural outcomes, they will be developed and implemented in alignment with EPR-EM12. The initiatives will include:	Project-wide Triggered prior to construction and applies during construction and operation.	Prepare/implement: VicGrid VNI West; Delivery Partner/Principal Contractor; TNSP where relevant Review/accept: VicGrid VNI West in consultation with relevant Traditional Owner groups, councils and other stakeholders	Local Workforce Development Strategy; consultation records; inclusive employment/training initiatives; workforce participation records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Strategies focused on the employment of First Nations people, apprentices, trainees, people with disability and women - Training, upskilling and employment pathway initiatives, including through apprenticeships, traineeships and cadetships - Mechanisms for jobseekers to register their capabilities and interest in working on the Project to be promoted through appropriate channels within the LGAs intersected by the Project - Measures to promote employment opportunities through appropriate channels, including relevant Traditional Owner groups, councils, employment service providers, training organisations and community organisations.				
Aboriginal Cultural Heritage					
ACH01	Develop an engagement plan to outline requirements for Traditional Owner participation and oversight of the implementation of cultural heritage requirements for the life of the Project. Develop Traditional Owner engagement plan(s) to outline ongoing involvement of Barengi Gadjin Land Council Aboriginal Corporation and Dja Dja Wurrung Clans Aboriginal Corporation, and, where appropriate, other Traditional Owner group and Knowledge Holders in Project design, development, and delivery, including opportunities for input into decision making for the life of the Project. Engagement Plan(s) will be prepared separately for different RAPs or Traditional Owner groups, recognising that engagement approaches, priorities and decision-making processes may vary.	Project-wide, with Traditional Owner group-specific application. Triggered prior to construction on the relevant country.	Prepare/implement: VicGrid VNI West Consult: relevant Traditional Owner groups	Engagement plans prepared; engagement/review records including records of integration of feedback/responses received.	Design, Construction, Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Engagement Plan(s) will be developed in consultation with and to the satisfaction of the relevant RAPs and other Traditional Owner groups, and will include details about the frequency of consultation, outcomes, accountability measures, and dispute resolution procedures. The engagement plan will provide a framework for consultation during detailed design, construction, and operation, in relation to the following Project activities, at a minimum: • Consider relevant leading practice principles, including the Leading Practice Principles: First Nations and Renewable Energy Projects prepared by the Clean Energy Council and KPMG, as updated from time to time. • engagement on areas where Aboriginal cultural heritage values intersect with other environmental or land management matters; • completion of further CHMP and CVA assessment where access becomes available; • refinement of works to avoid or minimise harm to Aboriginal cultural heritage; • implementation of recommendations from CVAs, and how those recommendations have guided decision-making; and • implementation of CHMP conditions and contingencies. • Where relevant, Project planning and implementation must have regard to applicable Traditional Owner On Country plans, land management plans, or cultural frameworks, in consultation with the relevant RAPs and Knowledge Holders. • The Project must demonstrate how Traditional Owner input has informed Project decision-making.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
ACH02	Commitment to assessment of inaccessible areas CHMP Access In advance of any works in CHMP activity areas where land access constraints have precluded the completion of field assessment during the EES, complete the Standard and Complex Assessments for any relevant CHMPs (EPR ACH04) after access is available, and prior to the commencement of works in those areas. Cultural Values Assessments In advance of any works, Cultural Values Assessments (CVAs) must be developed by or in consultation with Barengi Gadjin Land Council Aboriginal Corporation (BGLC), Dja Dja Wurrung Clans Aboriginal Corporation (DDWCAC), and Barapa Barapa and Wamba Wemba Knowledge Holders or other relevant Traditional Owner groups and Knowledge Holders (if applicable) for the relevant parts of the Project area, after access is available and prior to works commencing in these locations. The approach to CVAs may vary between groups and must be undertaken in a manner agreed with the relevant RAPs and Knowledge Holders. The outcomes of these assessments must be implemented, in consultation with BGLC, DDWCAC, Barapa Barapa and Wamba Wemba Knowledge Holders, and First Peoples – State Relations (FP-SR) where applicable, to inform final design, construction planning, impact avoidance and minimisation measures and enhancement of cultural values where appropriate. Where Aboriginal cultural heritage places or values are identified through these assessments, they must be recorded and managed in accordance with the Aboriginal Heritage Act 2006 (Vic) and incorporated into the relevant CHMP(s) where required.	Project-wide, with Traditional Owner group-specific and location-specific application. CHMPs Triggered for all activities listed as part of the Project in line with the <i>Aboriginal Heritage Act 2006</i>. Triggered where a relevant Registered Aboriginal Party or Traditional Owner group elects to undertake a CVA for part of the Project, or where CVA outcomes are available to inform design, construction planning, operation or decommissioning.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant Engage/co-design: relevant Registered Aboriginal Parties and Traditional Owner groups	CHMP/CVA records; engagement and information-sharing records; implementation plans/action registers; recommendation response and design integration records; reporting to RAPs/Traditional Owner groups	Design, Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	VicGrid VNI West must demonstrate how these values have informed Project decision-making, including how recommendations have been implemented and, where relevant, why they have or have not been implemented.				
ACH03	Avoidance-led design for Aboriginal cultural heritage Design and deliver the Project to avoid impacts to Aboriginal cultural heritage wherever possible, minimise impacts where avoidance cannot be achieved and focus on opportunities to enhance cultural values throughout. Project design must demonstrate how avoidance and minimisation have been achieved, including through consideration of alternative locations, layouts and construction approaches, informed by cultural heritage assessments and undertaken in consultation with the relevant RAPs and Knowledge Holders. Design must be progressively refined as further cultural heritage information becomes available. Measures must include, where relevant: • micro-siting and refinement of the location of towers, poles, access tracks, work areas, laydowns and ancillary infrastructure; • use of existing disturbed areas; • minimisation of the extent of ground disturbance; • adoption of construction methods that reduce subsurface disturbance; and • establishment of no-go zones, exclusion areas or protective buffers around identified cultural heritage places or areas of cultural heritage sensitivity where avoidance is possible.	Project-wide, with Traditional Owner group-specific and location-specific application. CHMPs Triggered for all activities listed as part of the Project in line with the <i>Aboriginal Heritage Act 2006</i>. Triggered where a relevant Registered Aboriginal Party or Traditional Owner group elects to undertake a CVA for part of the Project, or where CVA outcomes are available to inform design, construction planning, operation or decommissioning.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant Engage/co-design: relevant Registered Aboriginal Parties and Traditional Owner groups	CHMP/CVA records; engagement and information-sharing records; implementation plans/action registers; recommendation response and design integration records; reporting to RAPs/Traditional Owner groups	Design, pre-construction, construction, operation, decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Where impacts to Aboriginal cultural heritage cannot be avoided, salvage excavation, or other measure, must be undertaken as a last resort in accordance with the approved CHMP and in consultation with the relevant RAP, Knowledge Holders, and FP-SR (where relevant). - The Project must demonstrate, through the CHMP and supporting Project documentation, that all reasonable avoidance and micro-siting measures have been explored and applied in accordance with the mitigation hierarchy under the <i>Aboriginal Heritage Act 2006</i> (Vic), and that impacts to Aboriginal cultural heritage have only occurred where they cannot be avoided through design.				
ACH04	Cultural Heritage Management Plans (CHMPs) CHMPs 19679, 21002, 19678, 21003, 19573, and 21004 must be prepared and approved in accordance with the <i>Aboriginal Heritage Act 2006</i> and Aboriginal Heritage Regulations 2018 prior to the commencement of works. No works may commence within a CHMP activity area until the relevant CHMP has been approved. All works must be undertaken in accordance with the conditions and contingencies of approved CHMPs 19679, 21002, 19678, 21003, 19573, and 21004, and all works must take place within the applicable CHMP activity area, including any vegetation removal. Compliance with all approved CHMP conditions is mandatory. The CHMPs listed above are current at the time of assessment. Additional or amended CHMPs may be required as the Project progresses. Where Project design, scope, or impacts change, the Project must review the relevant CHMP(s) and, where required, prepare and obtain approval for amended or additional CHMPs prior to works commencing.	Project-wide, with Traditional Owner group-specific and location-specific application. CHMPs Triggered for all activities listed as part of the Project in line with the <i>Aboriginal Heritage Act 2006</i>.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant Engage/co-design: relevant Registered Aboriginal Parties and Traditional Owner groups	CHMP/CVA records; engagement and information-sharing records; implementation plans/action registers; recommendation response and design integration records; reporting to RAPs/Traditional Owner groups	Design, Construction, Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The purpose of the CHMPs is to identify, assess and manage Aboriginal cultural heritage, and to implement measures to avoid, minimise and manage impacts in accordance with the <i>Aboriginal Heritage Act 2006</i> (Vic), including contingency measures for unexpected finds. The CHMP process will refine results of the Aboriginal Cultural Heritage Archaeological Sensitivity Model included within the Aboriginal Cultural Heritage Specialist Assessment, through ground truthing and inclusion of results into the model. The approved CHMPs will be included in CEMPs.				
ACH05	Ancestral remains avoided, managed lawfully, and respectfully The Project must be designed and constructed to avoid any impact to Ancestral Remains (Aboriginal human remains). Ancestral Remains must not be knowingly disturbed, impacted, or relocated as part of the Project. During construction, all works must be undertaken in accordance with the human remains procedures contained within any approved CHMP(s). If suspected Ancestral Remains are identified during construction: • works must cease immediately in the vicinity of the find; • the find must be managed in accordance with the approved CHMP(s) and relevant legislative requirements; and • works must not recommence until the relevant procedures have been followed and any required approvals under the applicable legislative and CHMP processes have been obtained.	Project-wide. Triggered at all stages of development, construction and decommissioning.	Prepare/implement: VicGrid VNI West Support: Delivery Partner/Principal Contractor where relevant	CHMP records; engagement records; stop-work/isolation records; recommendation response and design integration records; recommencement/closure records.	Construction, Operation (where ground disturbance occurs)

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Project must demonstrate that any Ancestral Remains identified during construction are protected in situ and are not disturbed or relocated, and that design and construction responses are implemented to ensure their ongoing protection.				
ACH06	Cultural Values Assessment recommendations and Aboriginal Cultural Heritage Implementation Plans VicGrid VNI West will offer reasonable support to each relevant Registered Aboriginal Party and Traditional Owner group to undertake an updated Cultural Values Assessment (CVA), unless otherwise agreed with that Registered Aboriginal Party or Traditional Owner group. The timing, scope and methodology for each CVA will be determined by the relevant Registered Aboriginal Party or Traditional Owner group, supported by VicGrid VNI West through reasonable access, information sharing and resourcing arrangements where agreed. Where a CVA is agreed to be undertaken for a relevant part of the Project, VicGrid VNI West will use reasonable endeavours to support its completion before construction works commence in the area to which the assessment relates. Where completion before relevant works is not practicable, VicGrid VNI West will continue to engage with the relevant Registered Aboriginal Party or Traditional Owner group to agree an alternative process or timeframe for considering CVA outcomes, having regard to access arrangement Project timing, approved CHMPs and other approval requirements.	Project-wide, with Traditional Owner group-specific and location-specific application. Triggered where a relevant Registered Aboriginal Party or Traditional Owner group elects to undertake a CVA for part of the Project, or where CVA outcomes are available to inform design, construction planning, operation or decommissioning.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP where relevant Engage/co-design: relevant Registered Aboriginal Parties and Traditional Owner groups	CVA and information-sharing records; engagement records; implementation plans/action registers; recommendation response and design integration records; reporting to RAPs/Traditional Owner groups	Design; Pre-construction; Construction; Operation; Decommissioning where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	VicGrid VNI West will engage with each relevant Registered Aboriginal Party and Traditional Owner group, consistent with the engagement approach in ACH01, to develop Aboriginal Cultural Heritage Implementation Plans that address agreed recommendations arising from each group's CVA, to avoid or minimise impacts on intangible Aboriginal cultural heritage values from the Project. Aboriginal Cultural Heritage Implementation Plans will include, where relevant: • engagement principles and objectives for design, construction, operation and decommissioning, as agreed between VicGrid VNI West and the relevant Registered Aboriginal Party or Traditional Owner group • a co-designed process for responding to agreed Cultural Values Assessment recommendations, including implementation timeframes and reporting requirements to the relevant Registered Aboriginal Party or Traditional Owner group • a process for collaborating with the relevant Registered Aboriginal Party or Traditional Owner group to investigate opportunities to visit areas not previously accessible, to support further enhancement of cultural knowledge • initiatives for procurement of goods and services from Aboriginal-owned businesses, and opportunities for Registered Aboriginal Parties and Traditional Owner groups to provide environmental and land management services where appropriate • consideration of relevant leading practice principles, including the Leading Practice Principles: First Nations and Renewable Energy Projects prepared by the Clean Energy Council and KPMG, as updated from time to time.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
Agriculture					
AG01	Preparation of landholder-specific Property Management Plans (PMPs) Prior to the commencement of construction works on each directly affected property, the Delivery Partner/Principal Contractor will develop and implement a Property Management Plan (PMP) for that property to avoid, minimise and mitigate impacts on agricultural activities, land use and farm businesses to the extent reasonably practicable. Each Property Management Plan will be prepared having regard to applicable land access arrangements, statutory approvals and property-specific requirements, in consultation with the landholder. The PMP will document how landholder feedback has been considered. Where agreement cannot be reached, the PMP will document the matters raised by the landholder, the Project response, and the escalation pathway applied under the CSEP and complaints management process. Where consultation has not been possible despite reasonable endeavours, and where the Project is otherwise authorised to proceed, an interim standard Property Management Plan will be prepared and implemented until property-specific consultation can occur. VicGrid VNI West and the Delivery Partner/Principal Contractor will continue to use reasonable endeavours to consult with the relevant landholder and update the plan with property-specific requirements as soon as practicable.	Property/location specific. Required for each directly affected property before works commence and whenever operational or decommissioning activities materially interact with agricultural land use.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Accept: VicGrid VNI West for construction and pre-handover plans; TNSP for operational plans	PMPs; landholder consultation/baseline records; complaints/issues records; rehabilitation inspection and close-out records	Pre- construction; Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	All PMPs will include minimum controls for property access, biosecurity, reinstatement, notification and issue escalation. The interim standard Property Management Plan will include those minimum controls. Property-specific requirements identified through consultation will be incorporated where practicable and where consistent with the EMF, EPRs and statutory approval conditions. Each PMP will include, at a minimum: • a single point of contact for the landholder and communication protocols for two-way engagement • notification procedures for construction activities, access requirements and relevant changes to work timing or location • a pre-condition baseline assessment of relevant land conditions, infrastructure and access areas, drainage, fencing, gates, tracks and other features that may be affected by Project activities to inform rehabilitation and reinstatement • the final location, where available, of Project activities to occur on the property, including towers, temporary work areas, temporary and permanent access tracks, fencing, portable facilities and vegetation removal • property access arrangements for movement of personnel, vehicles, livestock and equipment • measures to minimise disruption to livestock, irrigation, water supply and other farm infrastructure • identification of periods where works should be avoided or minimised where practicable, such as harvesting, lambing and calving through consultation				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• where works cannot avoid or minimise disruption during critical agricultural periods, requirements for advance notice, consultation with the affected landholder, and identification of practicable support, access, staging, reinstatement or other management measures will be adopted • property-specific safety assessment where appropriate • property-specific biosecurity requirements, including any additional requirements to be implemented in conjunction with the Biosecurity Management Plan required under AG02 • requirements for rehabilitation and reinstatement to previous level of agricultural use, including pasture re-establishment, weed control, soil improvement and reinstatement of affected infrastructure or landform features where relevant • requirements for post-reinstatement inspection and remedial action where rehabilitation or reinstatement criteria are not achieved • information on relevant issue escalation, reinstatement, rehabilitation, compensation or claims pathways where relevant • notification and management procedures for incidents, issues and complaints relevant to the property • requirements for review and update of the PMP where property conditions, access arrangements or Project activities materially change.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
AG02	Biosecurity Management Plan(s) (BMP) Prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement a Biosecurity Management Plan (BMP) as a sub-plan of the CEMP to avoid and minimise biosecurity impacts on agricultural land uses, biodiversity values, landholders and farm businesses. The BMP will be prepared with input from agricultural specialists and relevant landholders where property-specific biosecurity risks are identified. Agriculture Victoria will be consulted where regulatory advice is required or where declared weeds, pest animals, diseases or pathogens present a material biosecurity risk. Prior to operation and decommissioning, the relevant delivery entity will review and update the BMP, as required, for those phases. The BMP will include procedures for identifying, recording, escalating and responding to biosecurity incidents and breaches, including pest, weed, disease or pathogen risks affecting agricultural land, livestock, crops, biodiversity values or landholder operations. These procedures will identify relevant notification and escalation pathways, including landholders, Agriculture Victoria and other relevant authorities where required, and will interface with the Project's incident management and emergency response procedures under EM07 where a biosecurity incident requires a coordinated emergency response. The BMP will be reviewed by the Independent Environmental Auditor under EM02 for consistency with the approved EMF, EPRs and applicable statutory approval conditions. Implementation of the BMP will be subject to periodic independent audit in accordance with EM02. The BMP will include, at a minimum:	Project-wide, with property-specific application through PMPs. Required prior to ground disturbance and whenever personnel, vehicles, plant, equipment or materials enter agricultural land or move between properties	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, where relevant); Principal Contractor for decommissioning Review/accept: VicGrid VNI West for construction-phase BMP; TNSP for operational BMP, where relevant Independent review/verification: IEA under EM02 where required	BMP; hygiene/movement/training records; incident/breach and corrective action records; review/update records	Pre-construction; Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• requirement that inductions/training on the BMP must be completed by workers prior to entering affected properties and that records of training are appropriately verified as part of routine site construction mobilisation. • measurable performance standards and outcomes, to verify that biosecurity controls are effective in avoiding and minimising the introduction or spread of declared weeds, pest animals, diseases and pathogens between properties, work areas and sensitive environmental areas, so far as reasonably practicable • planning measures to avoid or minimise biosecurity risks, including movement sequencing, avoidance of wet or muddy areas where feasible, and consideration of weed seed set and disease spread periods where practicable • inspection and hygiene requirements for vehicles, plant, equipment, clothing and supplies before entering and leaving properties • requirements for washdown, footbath and sanitising procedures, including standards for washdown facilities where established • requirements for vehicle biosecurity kits and any other minimum equipment necessary to implement biosecurity procedures • record keeping for vehicle, plant, equipment and personnel movement, treatment, incidents, compliance and breach detection • controls requiring vehicles and equipment to remain within approved access corridors and formed tracks on farming properties unless otherwise agreed • training requirements to ensure all personnel understand and implement BMP requirements				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- auditing, periodic review and update requirements, including consideration of emerging biosecurity risks, regulatory feedback, third-party review outcomes and landholder feedback from earlier project phases - ongoing monitoring requirements for the easement and rehabilitated areas where relevant to biosecurity performance - biosecurity incident and breach response procedures, including investigation, containment, notification, corrective action, close-out and review requirements - escalation pathways for biosecurity incidents requiring a coordinated response, including interface with emergency response procedures under EM07 where relevant. Any additional property-specific biosecurity issues or requirements will be documented and implemented through the relevant PMP prepared under AG01.				
Air quality					
AQ01	Dust and Air Quality Management Plan (DAQMP) Prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement a Dust and Air Quality Management Plan (DAQMP) as a sub-plan of the CEMP to avoid and minimise dust and other air quality impacts during construction and decommissioning. Prior to operation, the TNSP will review and update the AQMP, where required, for operational air quality matters. The DAQMP will be prepared in accordance with this EMF, the General Environmental Duty under the <i>Environment Protection Act 2017</i>, and relevant guidance, as updated from time to time, including: EPA Victoria Publication 1834.2 – Civil Construction, building and demolition guide	Project-wide. Required prior to construction and applies where construction, decommissioning or relevant operational activities may generate dust, odour or other air quality impacts, with enhanced application near sensitive receptors and during high-risk weather conditions.	Prepare: Delivery Partner/Principal Contractor (construction); TNSP (operational update, where required); Principal Contractor for decommissioning Implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, where relevant); Principal Contractor for decommissioning	DAQMP; weather/air quality monitoring; dust/odour inspection records; complaints/incidents and corrective actions	Pre-construction; Construction; Operation where relevant; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- EPA Victoria Publication 1943 – Guidance for assessing nuisance dust - EPA Victoria Publication 1961 – Guideline for assessing and minimising air pollution in Victoria - EPA Victoria Publication 1894 – Managing soil disturbance - EPA Victoria Publication 1895 – Managing stockpiles - EPA Victoria Publication 1897 – Managing truck and other vehicle movement - UK Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction. The DAQMP will document risks of harm to human health and the environment from dust and air emissions will be managed in accordance with the GED, including consideration of reasonably practicable controls. The Plan will include, at a minimum: - measures to minimise vegetation disturbance and exposed soil areas - measures to minimise drop heights from loading or handling equipment - stockpile management measures, including minimising stockpile duration and covering stockpiles where required - progressive stabilisation, rehabilitation or revegetation of exposed areas where practicable - requirements for covering or otherwise managing loads with potential for dust or litter loss during transport - dust suppression measures for unsealed work areas, access tracks, stockpiles and dust-generating activities, including use of water sprays, water carts, screens or other suitable controls where required		Review/accept: VicGrid VNI West (construction); TNSP (operation); VicGrid VNI West/TNSP, as relevant (decommissioning)		

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• vehicle and mobile equipment management measures, including use of designated areas, minimising idling, restricting vehicle speeds and selecting vehicles and equipment with lower emissions where feasible and reasonable • procedures for identifying and managing odorous soils, odorous materials or other odour-generating sources encountered during works • weather monitoring procedures to identify conditions likely to increase air quality impacts at sensitive receptors, and requirements to modify works where required • site inspection procedures to confirm that dust controls are in place and effective, including increased inspection frequency where works are near sensitive receptors, where activities have a high dust generation potential, or during prolonged dry, hot or windy conditions • dust and air quality monitoring requirements where required to verify the effectiveness of controls • procedures requiring works to be modified, temporarily ceased or additional controls implemented where dust is observed to be creating a hazard, causing visible offsite dust impacts, or where implemented controls are not effective • procedures for managing complaints, incidents and non-compliances, including investigation, response, corrective action and update of controls • procedures for review and update of the DAQMP where monitoring results, audit findings, complaints, incidents or changes in construction methodology indicate additional or modified controls are required.				
Aviation					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
AV01	Aviation stakeholder notification and consultation During detailed design and prior to the commencement of construction, the Principal Contractor will provide final Project design information relevant to aviation safety and operations to relevant aviation stakeholders and affected parties and will consult where Project infrastructure may materially affect existing aerial operations, including agricultural aviation and drone-based agricultural activities. This will include, at a minimum: - provision of final transmission line and tower coordinates, and where relevant elevations, to the following stakeholders: - Airservices Australia - Department of Defence - Gannawarra Shire Council and other landowners of existing and proposed aerodromes/airstrips located within 3 nm of the project - Ambulance Victoria - Victoria Police Air Wing - Country Fire Authority - Royal Flying Doctor Service - Department of Energy, Environment and Climate Action (Forest Fire Management Victoria) - Other relevant aviation stakeholders identified during detailed design - provision of relevant Project information, including location and height information for the final transmission line and towers, to nearby landholders where aerial agricultural operations or drone-based agricultural activities may be materially affected, where the term “nearby landholders” refers to all owners and occupiers of the following land:	Project-wide, with site-specific application. Triggered during detailed design, pre-construction and where crane operations, temporary tall plant, aerial agricultural operations, drone-based agricultural activities or other aviation interfaces are relevant.	Prepare/implement: Delivery Partner/Principal Contractor Support: VicGrid VNI West where landholder interface is required Approve/agree: relevant authority, aerodrome operator or landholder, where approval or agreement is required	Notification/consultation records; design information issued; crane approvals where required	Design; Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Land that hosts the Project, or adjoins the Project and where aerial agricultural operations are occurring, or will occur, based on information available to the proponent; and - Land that is not located within a township zone or other urban zone according to the applicable Planning Scheme, and that is located within 2 km of the proposed final route of the Project. • engagement with relevant landholders where the Project may materially affect existing aerial farming operations, including low-level aerial spraying, mapping, mustering, surveillance, precision agriculture or drone-based agricultural activities • Identification of appropriate management arrangements, such as alternative airstrip orientations, notification protocols, updated farm operation information, marking or communication of hazards, or other mutually agreed measures • notification of crane use and other temporary tall plant or equipment to relevant aerodrome operators, local authorities and other stakeholders where required for safe aviation operations, including owners of uncertified aerodromes within 3 nautical miles where relevant • provision of at least seven days' notice of crane operations, where required, to enable notification through the Notice to Airmen (NOTAM) procedure • further notification where final Project design or temporary works materially alter previously provided aviation-related information.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
AV02	Kerang Aerodrome/PAN-OPS protection During detailed design and prior to the commencement of construction, the Principal Contractor will ensure that the Project avoids infringement of applicable PAN-OPS protection surfaces at relevant aerodromes, such as Kerang Aerodrome, or otherwise obtains any required agreement or approval from the relevant aerodrome manager before construction proceeds. To address the potential PAN-OPS impact at Kerang Aerodrome, the Delivery Partner/Principal Contractor will ensure one of the following measures is implemented: • use the Tragowel eastern easement option, which would not impact Kerang Aerodrome; or • move the four identified transmission towers outside of the affected protection area; or • limit transmission line tower heights to equal to or less than 53.2 metres within the RNP RWY 32 PAN-OPS area; or • raise the RNP RWY 32 Minimum Descent Altitude (MDA); or • create a stepdown fix to push the MDA past the Project. Detailed design will demonstrate how this requirement has been addressed. Where approval is required to construct towers or operate cranes in an area that may affect Kerang Aerodrome operations, the Principal Contractor will obtain the relevant approval from the Aerodrome Manager prior to the relevant works commencing. The Principal Contractor will provide the Aerodrome Manager with details of the proposed crane operations at least seven days prior to their commencement to enable notification through the NOTAM procedure.	Site-specific. Triggered where Project infrastructure or temporary works may affect Kerang Aerodrome or another relevant aerodrome's PAN-OPS protection surfaces or related aviation operations.	Prepare/implement: Delivery Partner/Principal Contractor Approve/agree: relevant Aerodrome Manager/aviation authority where required	Design compliance records; approval/agreement records; crane approvals where required	Design; Pre-construction; Construction
Bushfire Risk					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
BF01	Construction Bushfire Mitigation and Management Plan (CBMMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a CBMMP, in consultation with CFA and relevant fire authorities, to avoid and minimise bushfire risk associated with construction of the Project. Preparation of the CBMMP must be undertaken in accordance with relevant ecology EPRs, including EC02 (Construction Vegetation and Habitat Management Plan) and EC10 (Understory Retention and Partial Clearance Plan). The CBMMP will include as a minimum: • All areas of the Project including the Tragowel Terminal Station, Bulgana Reactor Station, workforce accommodation sites, laydown areas and transmission infrastructure to be provided with appropriate setbacks from the surrounding unmanaged vegetation. Vegetation removal or management required to establish setbacks or to comply with fuel management requirements must be undertaken in accordance with EPR-EC02. • Policies and procedures to be developed and implemented including: • Equipment test and tag programs • Smoking only occurring in fuel-free areas, subject to a documented assessment confirming that the area is fuel-free and suitable for smoking • The Introduction of a hot works permit system • Restricting vehicles travelling on vegetated surfaces during the fire danger period. • Procedures for ensuring all activities undertaken during the Fire Danger Period are appropriate under the Country Fire Authority Act 1958, including: – Compliance with Total Fire Ban Day restrictions.	Project-wide. Triggered prior to construction and applies to all relevant construction areas, including transmission infrastructure, terminal station, reactor station, workforce accommodation sites and laydown areas.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West Approve: Minister for Planning	CBMMP; induction/toolbox records; fire safety inspections; water supply/access records; IEA verification where applicable	Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	– Obtaining permits for “hot work” activities. • Details of induction programs for all staff, contractors and site visitors to ensure they are informed of fire response procedures and have appropriate personal protective clothing. • Details of the requirements for daily toolbox briefings and documented pre-start checks of the construction site to confirm that bushfire safety requirements have been considered and relevant controls are in place. • A communication plan to facilitate a high standard of communication with landholders, relevant stakeholders, including local crews, and the community regarding daily activities, to be developed in accordance with the principles outlined in the Communications and Stakeholder Engagement Plan (CSEP) required by EPR-EM08. • Details of a primary contact person for the community to contact with concerns, questions or issues. • Details of a suitably qualified (in fire response) primary contact person for CFA to contact with concerns, questions or issues. • Procedures to ensure all contractors: – Are appropriately briefed and understand their legal obligations in relation to managing bushfire risks – Have appropriate procedures, safe work practices, contingency plans, Material Safety Data Sheet (MSDS) for operation of all equipment, chemicals, flammable materials that may contribute to bushfires – Have appropriate “initial” suppression equipment available on site. • A policy for “no work” on declared Catastrophic Fire Danger days				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Requirements for declared Extreme Fire Danger days, including review of proposed activities and identification of appropriate controls or actions - Details of the proponent's fire suppression capability, in addition to local CFA resources, to enhance response in the development area - Procedures to ensure all temporary building construction is in line with all regulations and codes of building in bushfire prone areas and Construction of buildings in bushfire-prone areas (AS 3959:2018) - Details of the appropriate bunding in areas where there is potential for flammable fuels and oils to leak and create bushfires or other environmental risks - Measures for the provision of portable firefighting water supply during the fire danger period along the easement and a permanent supply of firefighting water at the workforce accommodation and laydown areas during construction of the Project - Details of a dedicated firefighting capability that will enable quick attack suppression services for the duration of the construction phase, including during the fire danger period - Details of how construction traffic will be managed to maintain firefighting appliance access to the Proposed Easement and the surrounding landscape - Documentation of how the current static water supply locations in the landscape have been assessed for their suitability to support aerial firefighting operations in the future - The process for notifying Airservices Australia of the presence and location of the constructed towers. Regarding temporary workforce accommodation facilities, the CBMMP will include details of the following measures: - The provision of asset protection zones that ensures all structures are not exposed to more than 10 kW/m².				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- BAL-29 Construction standard for all temporary workforce accommodation buildings. - The provision of a perimeter road along the boundary of the subject land between the adjacent bushfire hazard and future development within the site. The road is to have a minimum width of 5.5metres and be an all-weather road. The final location/design of perimeter road will be agreed in consultation with CFA once the detailed design of the site is developed by the Principal Contractor. - The site will be managed in a low threat condition in accordance with the below: - Grass will be short cropped and maintained during the declared fire danger period. - All leaves and vegetation debris will be removed at regular intervals during the declared fire danger period. - Within 10 metres of a building, flammable objects will not be located close to the vulnerable parts of the building. - Plants greater than 10 centimetres in height will not be placed within 3 metres of a window or glass feature of the building. - Shrubs will not be located under the canopy of trees. - Individual and clumps of shrubs will not exceed 5 sq. metres in area and will be separated by at least 5 metres. - Trees will not overhang or touch any elements of the building. - The canopy of trees will be separated by at least 2 metres. - There will be a clearance of at least 2 metres between the lowest tree branches and ground level.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Provide at least 45,000 litres static water supply with fittings compliant with BMO requirements. Static water supplies will be located so that all buildings are within 60 metres of a tank outlet. - Access to each accommodation structure, as per the BMO access requirements. A Bushfire Emergency Management Plan will be established for the operation of the temporary workforce accommodation facilities and include the requirement to close the site when the fire danger is forecast to be catastrophic.				
BF02	Construction Fire Emergency Management Plan (CFEMP) The Principal Contractor will develop and implement a CFEMP, in consultation with the relevant fire authority, and in accordance with <i>Planning for emergencies in facilities</i> (AS3745), to manage bushfire and other emergency response requirements during construction, that includes as a minimum: - Details of the various activities that will occur during the fire danger period in accordance with the Australian Fire Danger Rating System requirements, including details of how to evacuate the workforce accommodation when the fire danger is forecast to be catastrophic - Details of appropriate signs to assist emergency response crews to determine road names, location etc - Documentation to ensure all access roads and tracks are identified and meet CFA & FFMVic Guidelines for emergency vehicle access - Details of the locations of assembly areas, including for each accommodation area - Details of access to each accommodation structure, as per the BMO access requirements	Project-wide. Triggered prior to construction and applies where construction activities or workforce accommodation create emergency response requirements.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West Approve: Minister for Planning	CFEMP; emergency response/evacuation records; access and assembly area records	Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• Consideration of all hazards including storm, flood and bushfire • Details of the workforce accommodation and the number of personnel on the site. Details of current static water supply locations in the landscape and confirmation that they have been assessed for their suitability to support aerial firefighting operations in the future • Identification and mapping of local firefighting and emergency management assets, including assets identified through community and emergency services consultation as important to local fire response, in relation to the Proposed Easement, construction areas, access routes and nearby fire stations • Assessment of potential construction-related disruption to local fire response capability at a location or zone level, having regard to construction timing, sequencing, access arrangements, traffic management and proposed construction activities • Identification of additional mitigation measures where potential disruption to local fire response capability is identified, which may include maintaining access to existing firefighting assets, temporary access arrangements, temporary water supply or other temporary firefighting/emergency management assets at specific locations where required. Relevant emergency management information from the CFEMP will be communicated to landholders and other stakeholders, where appropriate, in accordance with the principles outlined in the Communications and Stakeholder Engagement Plan (CSEP) required by EPR-EM08.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
BF03	Operational Bushfire Mitigation and Management Plan (OBMMP) The TNSP will develop and implement an OBMMP, in consultation with the relevant fire authority, to manage bushfire risk associated with operation of the Project, that includes as a minimum: • Installation of lightning conductors to dissipate electricity to ground should the towers be impacted by lightning strike • The requirement to undertake regular inspections and maintain records of all towers, power lines (including easements) and associated infrastructure • The requirement to develop and document bushfire preparedness audits to record all “annual” fire danger season preparedness activities and prevention works, including the management of vegetation. Vegetation management required for bushfire preparedness and electrical safety clearance obligations must be undertaken in accordance with relevant ecology EPRs, including EC02 (Construction Vegetation and Habitat Management Plan) and EC09 (Operational Vegetation and Habitat Management Plan) and EC10 (Understory Retention and Partial Clearance Plan). • Details of induction programs for all staff, contractors and site visitors to ensure they are informed of fire response procedures and have appropriate personal protective clothing • The requirement to ensure that temporary/permanent access tracks within private properties, which are required for access to and along the easement, are maintained to meet industry standards for emergency vehicle access	Project-wide. Triggered prior to operation and applies to towers, power lines, easements, access tracks and associated operational infrastructure.	Prepare/implement: TNSP Accept: TNSP governance arrangements	OBMMP; inspection and annual preparedness audit records; CFA induction package; five-year review records	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- The TNSP will also develop an induction package for use by CFA members containing all relevant information on the Project operations, including specific bushfire response information which will form part of the Operational Fire Emergency Management Plan (OFEMP). This will include information to support emergency response decision-making near the operational transmission infrastructure during bushfire events, including relevant electrical safety considerations, access arrangements and emergency contact/escalation protocols. - Relevant operational bushfire management information from the OBMMP will be communicated to landholders and other stakeholders, where appropriate, in accordance with the principles outlined in the Communications and Stakeholder Engagement Plan (CSEP) required by EPR-EM08. This OBMMP will be reviewed regularly (at least every five years) to ensure that the best available climate change science is applied and that it considers the most relevant controls and objectives for the Project.				
BF04	Operational Fire Emergency Management Plan (OFEMP) The TNSP will develop and implement an OFEMP, in consultation with CFA, and in accordance with AS3745, to manage bushfire and other emergency response requirements during operation, that includes as a minimum: - Details of the various activities that will occur during the fire danger period in accordance with the Australian Fire Danger Rating System requirements - Identification and mapping of local firefighting and emergency management assets, nearby fire stations, access routes and relevant aerial firefighting considerations in relation to the operational transmission infrastructure	Project-wide. Triggered prior to operation.	Prepare/implement: TNSP Accept: TNSP governance arrangements	OFEMP; emergency response and review records	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Details of appropriate signs to assist emergency response crews to determine road names, location etc - Documentation to ensure all access roads and tracks are identified and meet CFA & FFMVic Guidelines for emergency vehicle access - Details of the locations of assembly areas. - Consideration of all hazards including storm, flood and bushfire - A process for incorporating available property-specific emergency response information, including known landholder access, water sources, tracks and firefighting considerations, where relevant Relevant emergency management information from the OFEMP will be communicated to landholders and other stakeholders, where appropriate, in accordance with the principles outlined in the Communications and Stakeholder Engagement Plan (CSEP) required by EPR-EM08. The OBMMP should be updated with any findings from the five-yearly review of climate change science.				
BF05	Bushfire detection technology assessment During detailed design the Delivery Partner/Principal Contractor will undertake and document a feasibility assessment for the installation of bushfire detection technology, including tower-mounted cameras at key locations, to support bushfire detection and response.	Project-wide, with location-specific application. Required during detailed design. Where bushfire detection technology is proposed to be installed, operational requirements will be incorporated into the OBMMP prior to operation of the relevant infrastructure.	Prepare: Delivery Partner/Principal Contractor during detailed design Specialist input: suitably qualified bushfire specialists Review/accept: VicGrid VNI West Implement: TNSP where technology is installed	Feasibility assessment; fire authority consultation; specialist bushfire advice; technology decision/OBMMP records where applicable	Design; Pre-construction; Operation where technology is installed.

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The feasibility assessment will be informed by advice from suitably qualified bushfire specialists, CFA and relevant fire authorities. The assessment will consider whether the technology can be practicably and effectively implemented having regard to tower locations, power supply, communications requirements, monitoring and notification responsibilities, maintenance requirements, access requirements, integration with emergency response arrangements, and ongoing operation and maintenance requirements. The feasibility assessment will consider, at a minimum, whether the technology would be able to: • Detect smoke plumes from up to 20 kilometres away. • Automatically alert predetermined contacts via a mix of text messages, emails and other forms of communication. • Allow camera footage to be accessed from handheld devices and relevant Project or network control room(s), where applicable. • Be accessible by fire agencies or other relevant parties, where agreed. • The outcome of the feasibility assessment, including whether bushfire detection technology is proposed to be installed and the reasons for that conclusion, will be documented. • Where the feasibility assessment determines that bushfire detection technology is feasible and the technology is proposed to be installed, the TNSP will incorporate relevant operational, monitoring, maintenance, access, notification and response requirements into the Operations Bushfire Mitigation and Management Plan required by BF03.				
BF06	Decommissioning Fire Emergency Management Plan (DFEMP)	Project-wide. Triggered prior to decommissioning.	Prepare/implement: Principal Contractor for decommissioning	DFEMP; emergency response records	Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Principal Contractor for the decommissioning phase engaged by the TNSP will develop and implement a DFEMP in accordance with EM05 of the EMF and will include within that plan, the assessment and management of bushfire risk in consultation with CFA. Relevant emergency management information from the DFEMP will be communicated to landholders and other stakeholders, where appropriate, in accordance with the principles outlined in the Communications and Stakeholder Engagement Plan (CSEP) required by EPR-EM08.		Accept: TNSP		
Business and economics					
BE01	Business Mitigation and Support Strategy Prior to the commencement of construction, VicGrid VNI West will develop and implement an overarching Business Mitigation and Support Strategy to avoid and minimise impacts on businesses affected by the Project, to the extent reasonably practicable. The strategy will apply to: • directly affected businesses that are not addressed under the Agriculture EPRs; and • other businesses that are not directly affected by Project land requirements but are demonstrated to be materially affected by Project construction or operation, including where relevant businesses that rely on landscape, amenity or visitation values. The strategy will be informed by the communication and stakeholder engagement processes under EM08 and will have regard to the Victorian Small Business Engagement Guidelines produced by the Victorian Small Business Commission. The strategy will provide a process for:	Business-specific. Triggered prior to construction for directly affected businesses not covered under Agriculture EPRs, and for any other business demonstrated through consultation or assessment to be materially affected by Project construction or operation.	Prepare/implement: VicGrid VNI West; Delivery Partner/Principal Contractor; TNSP where relevant Review/accept: VicGrid VNI West	Strategy; business engagement; mitigation agreements and implementation records; review records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- consulting with business owners that agree to engage with the Project to understand business operations and the specific impacts that may arise during construction and operation - identifying, offering and implementing practicable support and management measures to lessen Project impacts on the business, including business infrastructure, customer access, amenity, day-to-day operations and business continuity where relevant - documenting agreed outcomes and implementation steps for individual businesses - providing information on reinstatement, rehabilitation, business support, land access, compensation or other relevant pathways, noting that this EPR does not create or determine any statutory, contractual or land access compensation entitlement - identifying the circumstances in which different support pathways may be relevant, having regard to the nature of the impact, the duration of the impact, whether the impact is temporary or permanent, and whether the business is directly or indirectly affected by Project activities - documenting how Project-related business impacts have been considered, the support or management measures offered, and the reasons for any agreed or not agreed outcomes - providing an escalation process for unresolved business impacts, including referral to the complaints management process under EM09 and any relevant land access, reinstatement, rehabilitation, contractual or statutory process - notifying businesses of construction timing, traffic changes and likely duration of impacts to assist business planning				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• providing access to reporting and complaints processes in accordance with EM09 • engaging with affected businesses for 12 months following completion of construction activities that directly affect the business, or completion of the nearest visible Project infrastructure where relevant to the impact pathway, and implementing agreed measures within that period unless otherwise agreed. Measures may include, where practicable: • landscape screening or other visual management measures in accordance with relevant LV EPRs • reconfiguration, relocation or re-orientation of business assets • increased marketing and promotional activities to encourage patronage • measures to avoid and minimise air quality, noise, vibration and traffic impacts in accordance with the relevant discipline EPRs • maintaining business access, including temporary access and signage where required • avoiding impacts on business assets or relocating and re-establishing assets in an agreed location • reinstatement and rehabilitation of temporary construction areas and access tracks • provision of appropriately qualified advisers where requested by the business and where this would assist in identifying practicable measures to avoid, minimise or manage Project impacts.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
BE02	Local procurement and business participation Prior to the commencement of construction, VicGrid VNI West will develop and implement a plan to increase positive social and economic impacts through procurement of goods and services from local communities, social enterprises, relevant Traditional Owner groups and enterprises, and Aboriginal-owned businesses, where practicable. The plan will be developed in consultation with stakeholders having regard to the Social Value Strategy required by EPR-SC01, the Local Workforce Development Strategy required by EPR-SC05, the Communications and Stakeholder Engagement Plan required by EPR-EM08, and Traditional Owner partnership arrangements required by EPR-EM12, where relevant. The plan will include: - initiatives and commitments to prioritise procurement from local businesses, particularly within the local government areas intersected by the Project, and from small to medium enterprises - initiatives and commitments to prioritise sustainable social enterprises, relevant Traditional Owner groups and enterprises, and Aboriginal-owned businesses - targets and commitments with associated responsibilities - mechanisms for eligible businesses and enterprises to register their capability and interest in working with the Project - communication strategies for promoting procurement opportunities - targeted and coordinated support to build the capacity of eligible businesses and enterprises to tender for work packages, including where relevant opportunities to work on Country on Crown land.	Project-wide. Triggered prior to construction and applies during construction and operation where procurement opportunities arise.	Prepare/implement: VicGrid VNI West Support/comply: Delivery Partner/Principal Contractor; TNSP Review/accept: VicGrid VNI West	Procurement plan/strategy; supplier/business support records; reporting records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
BE03	Tourism Mitigation and Support Strategy Prior to completion of the construction of the Project, VicGrid VNI West will develop a Tourism Mitigation and Support Strategy in consultation with relevant industry peak bodies, relevant Traditional Owner groups, local councils and relevant Victorian Government departments to identify reasonable and practicable measures to support and promote tourism in the municipalities within which the Project is located, having regard to tourism businesses and activities that may be affected by changes to access, amenity, seasonal visitation or landscape values. The strategy will identify implementation pathways in consultation with the relevant government department and other relevant stakeholders.	Project-wide. Triggered following completion of construction and applies during operation.	Prepare/implement: VicGrid VNI West; TNSP where relevant Review/accept: VicGrid VNI West in consultation with relevant stakeholders	Strategy; consultation records; implementation pathway records	Operation
Climate change					
CC01	Climate change resilience in design During detailed design, the Delivery Partner/Principal Contractor will design the Project to consider projected climate change conditions over its operational life, including changes to temperature, rainfall, flood risk, wind and extreme weather events. Design will be informed by relevant and current guidance and standards, including, as applicable: • Australian Standards, including the AS/NZS 1170 series • Australian Rainfall and Runoff Guidelines • relevant industry and regulatory guidance. The design will demonstrate that infrastructure is resilient to reasonably foreseeable future climate conditions, including: • structural integrity under extreme weather conditions	Project-wide. Required during detailed design and prior to finalisation of detailed design.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Climate-resilient design basis; standards/guidance review; design review records	Design

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- appropriate electrical clearances and operating performance under elevated temperatures - consideration of flood risk, drainage and hydrological changes - material durability and asset performance under changing environmental conditions.				
CC02	Climate risk assessment and design response During detailed design, the Delivery Partner/Principal Contractor will undertake a climate risk assessment to identify potential risks to Project infrastructure and operations associated with climate variability and change. The assessment will: - consider relevant climate hazards, including extreme heat, bushfire weather, flooding, high winds and other severe weather events - identify potential impacts on infrastructure, access, operations and maintenance - inform design responses and controls to reduce identified risks. The outcomes of the assessment will be incorporated into the final design and relevant management plans, as appropriate.	Project-wide. Required during detailed design and prior to finalisation of detailed design.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Climate risk assessment; design response and management plan update records	Design
CC03	Operational resilience and adaptive management The TNSP will operate and maintain the Project to support resilience to climate-related risks over its operational life. This will include: - implementing asset inspection, maintenance and management practices that consider climate-related risks, including extreme weather, vegetation growth and asset degradation - monitoring asset performance under changing environmental conditions	Project-wide. Triggered prior to operation and during operation where climate-related risks are identified through asset management, monitoring, incident review or risk register review.	Prepare/implement: TNSP Review/accept: TNSP governance arrangements	Asset inspection/performance monitoring; climate risk register updates; adaptive/corrective action records	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	reviewing and adapting maintenance and operational practices where required to maintain safety, reliability and environmental performance. Where climate-related risks are identified during operation, the TNSP will implement corrective and adaptive responses as directed by their organisational risk management framework. This will include periodic review of climate risks and adaptation responses, including implementation of CC04.				
CC04	Review climate change science and update climate risk assessment The TNSP will undertake five-yearly reviews of the best available climate change science, relevant climate projections and relevant planning overlays to inform an updated climate change risk assessment for the Project. The updated assessment will consider risks to Project infrastructure and operations, including indirect risks and flow-on impacts to surrounding communities, land uses, properties and environments where relevant. The assessment will identify any additional adaptation responses or controls required to manage priority risks arising from climate change. Outcomes will be incorporated into the Project risk register, operational management systems and relevant operational plans where required. A summary of the five-yearly review outcomes, including any material updates to climate risk assessment findings and adaptation responses, will be made publicly available on the Project website, subject to confidentiality, security, privacy and operational constraints.	Project-wide. Required during operation, at least every five years, and where material updates to climate science, climate projections, planning overlays or observed climate-related risks indicate review is required earlier.	Prepare/implement: TNSP Review/accept: TNSP governance arrangements	Five-year climate science review; updated climate risk assessment/Project risk register; operational plan updates; adaptation response records; public summary	Operation
Ecology					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EC01	Complete ecological surveys, apply sag and sway analysis, and finalise design Prior to the finalisation of detailed design for an area, the Principal Contractor will complete additional ecological surveys in areas where survey has not previously been completed, or has only been partially completed, due to access constraints and where vegetation removal or habitat disturbance may occur. The additional surveys will refine and confirm the extent, type (EVC) and quality of native vegetation, threatened ecological communities, threatened flora and fauna habitat, and any targeted threatened species that may be impacted by the Project within areas that have not previously been surveyed, or have only been partially surveyed due to access constraints. Surveys will be timed to coincide with survey guidelines for specific species. Where targeted survey cannot reasonably confirm presence because of survey timing or species detectability constraints, suitable habitat will be assumed to support the relevant species unless evidence supports a lower-risk conclusion. Where additional surveys identify previously unrecorded ecological values that may be impacted by the Project, the findings will be incorporated into the updated ecological mapping and detailed design to avoid or minimise impacts where practicable. Any residual impacts and associated offset requirements will then be recalculated, where applicable. Where the findings identify materially different ecological values or impacts from those assessed in the EES, the Principal Contractor will consult with DEECA, National EPA and/or Traditional Owners, as relevant.	Project-wide, with area-specific application. Triggered during detailed design, particularly in areas not fully surveyed and where construction footprint refinement is required.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Survey/mapping updates; sag and sway outputs; arborist assessments where relevant	Design; Pre-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	During detailed design and prior to the finalisation of detailed design for an area, the Principal Contractor will identify vegetation and habitat that can be retained, including no-go zones, retained habitat areas, and Notional Root Zones (NRZs) (previously known as tree protection zones) associated with retained native trees and access tracks outside the easement. The ecological mapping used to inform the Project design will be updated to reflect: • the outcomes of additional survey • the locations of no-go zones and retained habitat • the construction footprint within the Proposed Easement • NRZs and any trees initially assumed to be lost but subsequently identified through arborist assessment as capable of retention. When finalising detailed design for an area, the updated ecological mapping and sag and sway analysis will be used to refine the Project footprint and adjust infrastructure, where practicable, to avoid native vegetation, NRZs, threatened ecological communities, wetlands and threatened species habitat. In doing so, the Principal Contractor will have regard to the ecological inputs relevant to identification of access tracks and other construction areas, including avoidance or minimisation of impacts to native vegetation, threatened species habitat, wetlands and riparian areas.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EC02	Construction Vegetation and Habitat Management Plan (CVHMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a Construction Vegetation and Habitat Management Plan (CVHMP) as a sub-plan of the CEMP to avoid and minimise impacts on native vegetation, threatened ecological communities, threatened species habitat and habitat connectivity during construction. The CVHMP will be prepared in consultation with DEECA, Traditional Owners and National EPA, where relevant, and will be consistent with this EMF, the Project's approach to avoidance, minimisation and management of ecological impacts, and applicable legislation and policy. The CVHMP must have regard to the requirements for bushfire management outlined in BF01 (Construction Bushfire Mitigation and Management Plan). The CVHMP will include, at a minimum: • requirements for vegetation removal or management undertaken during construction to establish required electrical safety and operational clearance distances, or bushfire risk management setbacks and fuel management requirements, including controls to avoid or minimise associated ecological impacts to the extent practicable • measures to protect and monitor native vegetation, threatened ecological communities and habitat values to be retained • controls to identify, establish and maintain no-go zones and vegetation protection controls • controls to protect retained native trees, including scattered trees where relevant, and their associated protection zones • measures to minimise indirect impacts to retained vegetation, including disturbance outside approved work areas	Project-wide. Triggered prior to construction and where native vegetation, threatened flora or habitat values may be disturbed.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	CVHMP; vegetation protection/rehabilitation monitoring; threatened flora records	Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• a hollow replacement strategy, including identification of salvageable hollows, requirements for hollow salvage where practicable, opportunities for installation of artificial hollows or nest boxes where appropriate, and monitoring of any replacement habitat structures • requirements for reuse of habitat features such as logs, salvaged hollows and coarse woody debris where practicable and subject to landholder agreement • procedures for briefing contractors and subcontractors on protection requirements, including species identified as culturally significant in consultation with Traditional Owners • requirements for rehabilitation and reinstatement of disturbed areas not required to be kept clear during operation, having regard to local provenance and/or culturally significant plant species and landholder requirements • post-construction monitoring requirements for retained vegetation, rehabilitation, revegetation and weed management. A Native Vegetation Removal Plan (NVRP) will be prepared that identifies native vegetation, threatened ecological communities and species habitat to be removed and retained, location of No Go Zones and the construction footprint boundaries. Where decommissioning is proposed in the future, relevant vegetation and habitat management requirements will be addressed through the DEMP and any ecology sub-plans required at that time, having regard to the conditions then existing and applicable approval requirements. Measures for culturally significant plant species will be addressed in the Culturally significant species and materials salvage plan (EC16).				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The CVHMP and NVRP will be reviewed by the Independent Environmental Auditor where required under EM02.				
EC03	No-Go Zones and retained ecological values Prior to the commencement of construction, the Principal Contractor will identify, map, physically demarcate and maintain no-go zones to protect retained ecological values, under supervision of a qualified ecologist. These will be maintained throughout the construction phase. No-go zones will include all areas identified for avoidance through detailed design and ecological assessment under EC01. No-go zones will be clearly communicated to all personnel and enforced through site controls. No-go zones will include, where relevant, retained threatened flora occurrences, retained habitat features. Where ground disturbance is required during operation or decommissioning, no-go zones relevant to those works will be re-established and maintained.	Project-wide. Triggered prior to construction where ecological values are identified for retention. Triggered prior to operation or decommissioning where retained ecological values require No Go Zones to be reestablished for works.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, where relevant); Principal Contractor for decommissioning Accept: VicGrid VNI West/TNSP, as relevant	NGZ mapping/site plans; inspection and compliance records	Construction; Operation; Decommissioning
EC04	Ecological Biosecurity Management Plan (EBMP) Prior to the commencement of construction, the Principal Contractor will develop an Ecological Biosecurity Management Plan (EBMP) to address ecological biosecurity risks associated with the Project. For the purposes of ecology, the Ecological Biosecurity Management Plan will be prepared in consultation with DEECA and will address, at a minimum: - weeds, pests and pathogens affecting native vegetation and habitat - disease transfer affecting aquatic and semi-aquatic fauna, including chytrid fungus where relevant - hygiene and material movement controls for works in or near wetlands, waterways, riparian areas and other sensitive ecological locations	Project-wide, with heightened application in wetlands, waterways, riparian areas and other sensitive ecological locations. Triggered prior to ground disturbance and where ecological biosecurity risks arise.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Ecological BMP; inspections/hygiene logs; biosecurity incident records	Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- procedures for detecting, managing and responding to ecological biosecurity incidents - monitoring and record-keeping requirements relevant to ecological values.				
EC05	Fauna Management Plan (FMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a Fauna Management Plan (FMP) as a sub-plan of the CEMP to avoid and minimise impacts to native fauna during construction and decommissioning. The FMP will be prepared in consultation with DEECA and will include, at a minimum: - pre-clearance inspections and supervision of habitat removal by suitably qualified personnel - procedures for safe handling, salvage and relocation of fauna in accordance with applicable approvals and the <i>Wildlife Act 1975</i> - measures to avoid fauna entrapment in excavations and other construction hazards, including daily inspection requirements where relevant - procedures for management of injured, displaced or killed fauna to be developed in consultation with wildlife handling specialists such as local wildlife carers and veterinarians. - measures to identify and manage active raptor nests where relevant, including nest mapping and buffers where required - requirements for artificial hollows or nest boxes where hollow salvage is not practicable and where these measures are appropriate - traffic, signage and speed control measures to reduce wildlife strike risk along access routes and work areas - incident reporting, monitoring and adaptive management requirements.	Project-wide. Triggered prior to commencement of construction.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	FMP; fauna salvage/incident records; nest/habitat feature records	Construction; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EC06	Threatened Species Management Plan (TSMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a Threatened Species Management Plan (TSMP) as a sub-plan of the CEMP to minimise impacts on threatened flora and fauna species and habitat. The TSMP will be prepared in consultation with DEECA and National EPA, where relevant, and may include species-specific schedules or guild-based requirements where needed. The TSMP will include, at a minimum: • identification on relevant Project maps of confirmed and potential habitat for threatened species following pre-construction surveys to be completed under EC01 • targeted survey requirements where additional information is required to inform construction and habitat management • species-specific or fauna group-based management requirements for threatened fauna and their habitat, tailored to species or groups with similar habitat or ecological requirements • requirements to avoid, where practicable, construction activities in occupied habitat during sensitive periods such as breeding • fauna salvage, relocation or translocation requirements where appropriate and lawful • requirements to engage with National Herbarium of Victoria in relation to salvaging plants to establish ex-situ populations of threatened species • procedures to avoid newly identified occurrences of threatened flora where practicable • procedures for salvage, seed collection, propagation of threatened flora or revegetation measures where appropriate	Project-wide, with site-specific application in confirmed or potential threatened fauna habitat. Triggered where threatened fauna habitat is present or identified. To be prepared prior to construction.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	TSMP; survey and threatened fauna monitoring; connectivity/habitat monitoring	Construction; Operation where relevant; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- specific protection measures for significant threatened flora occurrences identified during assessment or additional survey - procedures for briefing contractors and subcontractors on flora and fauna protection requirements, including species identified as culturally significant in consultation with Traditional Owners - measures to retain or restore habitat structure where appropriate, including understorey, shrub layer, refuge features or replacement habitat structures where relevant to the species concerned - habitat connectivity measures where these are appropriate and practicable, including identification of locations, design considerations, consultation requirements and post-construction monitoring - species awareness and response procedures, including reporting procedures for construction personnel for incidents involving threatened wildlife, and the activities for which a suitably qualified ecologist is required on-site - exploration of the option for involving Zoos Victoria in a captive breeding program for species that are not suitable to be released into adjacent habitat - reporting and post-construction monitoring requirements to confirm compliance and assess effectiveness of the relevant controls and management responses.				
EC07	Collision Risk Management Plan (CRMP) Prior to the commencement of construction, the Principal Contractor will develop and implement a Collision Risk Management Plan, in consultation with DEECA and National EPA, to minimise the risk of bird collision with transmission infrastructure during construction and operation.	Project-wide, with location-specific application in key collision risk areas. To be prepared prior to construction and continue into operation.	Prepare: Delivery Partner/Principal Contractor (construction); TNSP (operational update)	CRMP; collision monitoring; mitigation maintenance records	Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The plan will identify key collision risk areas and any other locations of high bird utilisation or proximity to wetlands, riparian corridors and movement corridors. The plan will include, at a minimum: - controls to be applied in key collision risk areas during construction and operation, such as line marking, diverters or other visibility-enhancing measures - monitoring requirements to assess the effectiveness of those measures including monitoring of targeted areas where mitigation measures are not implemented for comparison - details of how this monitoring data will be used to add to the knowledge bank of Australian-specific information into collision risk management and to inform Traditional Owners of impacts on wildlife - review and adaptive management requirements to determine whether additional controls are needed - regard to current relevant guidance for reducing bird collision risk, including relevant BirdLife International guidance where applicable.		Implement: Delivery Partner/Principal Contractor (construction); TNSP (operation) Accept: VicGrid VNI West/TNSP, as relevant		
EC08	Riparian and aquatic habitat protection Prior to the commencement of construction, the Principal Contractor will develop and implement measures, documented in the CEMP and prepared in consultation with the relevant catchment management authorities and Traditional Owners, to avoid and minimise short- and long-term impacts on riparian vegetation, riverbed and aquatic habitat, and aquatic fauna connectivity. These measures will be developed and implemented in conjunction with SW01, including the requirements relating to setbacks from waterways, working within or adjacent to waterways, and erosion and sediment control. These measures will include, at a minimum:	Project-wide, with site-specific application within mapped wetlands or relevant waterway buffers. Triggered where works occur within or adjacent to waterways, wetlands or riparian areas.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Riparian management records; erosion/sediment inspections; rehabilitation monitoring	Construction; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- retention of native vegetation and habitat features in riparian areas where practicable - measures to minimise disturbance to banks, beds and aquatic habitat features such as retaining lower trunks/root balls/roots of large riparian trees in situ if removal of the trees cannot be avoided - erosion and sediment controls for works near waterways - revegetation and rehabilitation requirements for disturbed riparian areas not required for operation - consultation with landholders and Traditional Owners where fencing, rehabilitation or revegetation measures are proposed.				
EC09	Operational Vegetation and Habitat Management Plan (OVHMP) Prior to the commencement of operation, the TNSP will develop and implement an Operational Vegetation and Habitat Management Plan (OVHMP), in consultation with DEECA, to manage native vegetation and flora and fauna habitat within the easement during operation. The OVHMP will be consistent with the <i>Electricity Safety Act</i> and Regulations and the Code of Practice for Electric Line Clearance, as amended from time to time. The OVHMP must have regard to requirements for bushfire management outlined in BF03 (Operations Bushfire Mitigation and Management Plan). The OVHMP will include, at a minimum: - methods for ongoing vegetation management that minimise impacts on retained biodiversity values to the extent reasonably practicable - requirements for management of identified areas of partial clearance or retained understorey where relevant	Transmission line easement and operational maintenance areas. To be prepared prior to construction.	Prepare/implement: TNSP Review/accept: TNSP governance arrangements/VicGrid VNI West pre-handover as relevant	OVHMP; maintenance and vegetation monitoring	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- controls to minimise unnecessary disturbance during maintenance activities - controls to manage the spread of weeds and pathogens arising from maintenance activities - monitoring and adaptive management requirements for retained vegetation and habitat values during operation.				
EC10	Understorey Retention and Partial Clearance Plan (URPCP) Prior to the commencement of construction, the Principal Contractor will prepare an Understorey Retention and Partial Clearance Plan, in consultation with DEECA and TNSP, to identify locations where full vegetation removal is not required and where understorey or ground layer vegetation can be retained while maintaining compliance with the <i>Electricity Safety Act</i> and Regulations and the Code of Practice for Electric Line Clearance. The URPCP must have regard to the requirements for bushfire management outlined in BF02 (Construction Bushfire Mitigation and Management Plan) and BF03 (Operations Bushfire Mitigation and Management Plan). Given the predominance of agricultural land within the Project area, this plan will focus on sensitive locations where understorey retention would provide a meaningful biodiversity benefit, such as remnant road reserves, riparian crossings, waterways, drainage lines and other higher biodiversity value areas. The plan will specify, at a minimum: - the locations where partial clearance or understorey retention is proposed - the extent of vegetation to be retained in each location - the measures that will be implemented to protect retained understorey during construction	Site-specific. Triggered in sensitive crossings and other higher biodiversity value locations where partial clearance may be feasible and beneficial. To be prepared prior to construction.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	URPCP; location-specific implementation records; retained understorey monitoring where relevant	Design; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• how biodiversity value, constructability and safety requirements have been balanced • any updates required to the ecological mapping and related management plans as a result of the plan. The plan will be reviewed by the Independent Auditor where required under EM02.				
EC11	Further avoidance and minimisation framework for higher biodiversity value areas Prior to the finalisation of detailed design in areas identified through the ecological assessment, additional surveys or updated ecological mapping as having higher biodiversity value, the Principal Contractor will undertake a further targeted avoidance and minimisation assessment to determine whether additional native vegetation, habitat or ecological values can be retained through location-specific design refinement beyond the general process required under EC01. For the purposes of this EPR, higher biodiversity value areas are areas identified through ecological assessment, additional survey or updated ecological mapping as having elevated biodiversity sensitivity or constraint, including: • native vegetation of higher condition or connectivity value • threatened ecological communities • confirmed threatened flora occurrences or areas of potential threatened flora habitat • confirmed or higher-quality threatened fauna habitat • wetlands, waterways, riparian corridors and associated habitat • areas where concentrated habitat removal, fragmentation or connectivity impacts may otherwise occur	Site-specific. Triggered prior to finalisation of detailed design in areas identified through ecological assessment, additional survey or updated ecological mapping as having higher biodiversity value and where further location-specific avoidance and minimisation assessment is required.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Hotspot assessments/ ecological mapping; design refinement; NGZ updates where relevant	Design

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• areas where further avoidance or minimisation may reasonably be achieved through location-specific design refinement. This assessment will consider, where relevant: • engineering or constructability options such as increased tower heights, altered spans or micro-siting • implications for fire risk, safety, cost and visual impact • the extent of vegetation removal required for compliance with the Electricity Safety Act and Regulations • identification of any additional no-go zones that can be established. The outcomes of this assessment will be reflected in updated ecological mapping and final design for those areas.				
EC12	Pre-clearance surveys for threatened turtle nests Prior to the commencement of relevant works, the Principal Contractor will engage a suitably qualified ecologist to conduct surveys for nests of threatened turtle species within 500 metres of the Murray River, Loddon River and Pyramid Creek. The surveys will be undertaken in consultation with Turtles Australia and Traditional Owners, and the results will be provided to those stakeholders and incorporated into the relevant Fauna Management Plan and Threatened Species Management Plan requirements and work scheduling.	Site-specific. Triggered where relevant works occur within 500 metres of the Murray River, Loddon River or Pyramid Creek.	Prepare/implement: Delivery Partner/Principal Contractor Consult: Turtles Australia; relevant Traditional Owner groups Accept: VicGrid VNI West	Survey and consultation records; fauna plan updates	Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EC13	Environmental Line List (ELL) Prior to the commencement of construction, the Principal Contractor will prepare and maintain an Environmental Line List (ELL) to identify ecological values and location-specific management requirements and controls along the Project. The ELL will: • identify ecological constraints and sensitive receptors • specify the controls and management measures applicable at each relevant location • be integrated into construction planning and delivery • be updated as new information becomes available during construction and operation.	Project-wide. Triggered prior to construction and updated as new information becomes available.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, where relevant); Principal Contractor for decommissioning where relevant Accept: VicGrid VNI West/TNSP, as relevant	ELL updates; construction integration records	Construction; Operation; Decommissioning where relevant
EC14	Ecological offsets VicGrid VNI West will determine, secure and implement ecological offsets in accordance with applicable Commonwealth and State legislation and policy, following application of the Project's approach to avoidance and minimisation of ecological impacts. Where impacts cannot be avoided or minimised to the extent reasonably practicable, offset requirements will be identified and secured before vegetation/habitat removal occurs. The draft Offset Management Strategy will be updated in consultation with DEECA, Traditional Owners and National EPA, as needed.	Project-wide. Triggered prior to construction where residual ecological impacts remain after avoidance and minimisation.	Prepare/implement: VicGrid VNI West Accept: relevant approval authority where required	Offset strategy/register; offset compliance records	Pre-construction; Construction; Operation where relevant
EC15	Ecological monitoring and adaptive management	Project-wide. Triggered during implementation of ecology plans and where monitoring identifies issues or opportunities for refinement.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning	Monitoring reports; corrective/adaptive action records	Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Ecological monitoring will be implemented to assess the effectiveness of ecology management controls and to inform refinement of management responses (adaptive management) where required. Monitoring requirements and performance targets will be specified in each management plan to be developed in consultation with DEECA, National EPA and monitoring results provided to key stakeholders including Traditional Owners. Monitoring will: • assess compliance with relevant ecology management plans and EPRs • assess the effectiveness of key ecology management controls, including rehabilitation, habitat retention and any connectivity, hollow replacement or collision measures • track the state of native vegetation, threatened ecological communities and habitat relative to prior to commencement of Project works • identify emerging risks or non-compliance • inform corrective actions and adaptive management where outcomes are not being achieved.		Accept: VicGrid VNI West/TNSP, as relevant		
EC16	Culturally significant species and materials salvage plan (CSSMSP) Prior to the commencement of construction on the country of the relevant Traditional Owner groups, the Principal Contractor will prepare and implement a Culturally Significant Species and Materials Salvage Plan (CSSMSP) in consultation with the relevant Traditional Owner groups, unless otherwise agreed with those Traditional Owner groups. The plan will: • specify opportunities for Traditional Owner salvage of plants, seeds or timber and salvage from construction areas on Crown land	Group-specific/site-specific. Triggered prior to construction on the country of the relevant Traditional Owner groups and where Crown land construction areas provide opportunities for collection or salvage.	Prepare/implement: Delivery Partner/Principal Contractor Consult: relevant Traditional Owner groups Accept: VicGrid VNI West	CSSMSP; consultation and salvage implementation records	Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• specify opportunities for Traditional Owner salvage of fauna materials (e.g. fur, skin or bones) • be prepared having regard to Traditional Owner preferences for access for collection and salvage of plant and fauna materials • identify any limitations on access or salvage, including: - the overriding obligation to comply with this EMF and any applicable approvals - construction requirements, including timing constraints for commencement of works, ground conditions, weather and occupational health and safety requirements - materials to be salvaged - any need to obtain other approvals for collection or salvage. The plan will be implemented during construction and coordinated with the relevant ecology and Aboriginal cultural heritage requirements, including ACH02. The CSSMSP must have regard to EC05 (Fauna Management Plan) with particular reference to procedures for management of injured, displaced or killed fauna being conducted by appropriately skilled and trained personnel holding appropriate authorisations for salvage of wildlife.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EC17	Biodiversity induction Prior to any works that may affect biodiversity values, all relevant Project personnel will complete a biodiversity induction in accordance with the applicable phase-based environmental management plan (CEMP, OEMP or DEMP). The induction will: • be delivered by a suitably qualified ecologist and explain why protection of biodiversity values is important • include ecological and biodiversity background of the project easement and the types of vegetation, fauna and habitats that may be encountered • outline specific areas of ecological sensitivity, culturally sensitive biodiversity values and protected, vulnerable and endangered species which could be encountered at different locations • outline requirements in relation to designated No Go zones (EC03) • outline how to minimise risks of causing traffic trauma to wildlife and procedures to follow if an animal is injured • explain the relevant legal obligations and penalties under applicable legislation Refresher induction or awareness material will be provided where required, including where personnel are working in areas with high biodiversity sensitivity, where work methods or locations change, where an unexpected find has occurred, or where monitoring, audit findings or non-compliance indicate that refresher training is required. Periodic reinforcement of induction measures will occur at toolbox briefings, particularly where works are occurring in areas where high biodiversity or culturally sensitive values are present.	Project-wide, where works may affect biodiversity values. Initial induction required before relevant personnel commence those works. Refresher training or awareness required where triggered by changes in work location or methods, unexpected finds, monitoring, audit findings or non-compliance.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, where relevant); Principal Contractor for decommissioning Deliver: suitably qualified ecologist	Biodiversity induction materials and completion records; refresher and toolbox briefing records	Construction; Operation where relevant; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	A summary of the induction will be made available to personnel undertaking Project works, including through posters or similar material displayed in relevant work areas.				
Electromagnetic Field (EMFI)					
EMFI01	Pre-construction confirmation of EMFI design compliance During detailed design and prior to construction, the Delivery Partner/Principal Contractor will update and re-run the EMFI assessment for the transmission line, Tragowel Terminal Station and Bulgana Reactor Station using final design parameters to validate design compliance. The updated assessment will confirm that any changes to the transmission line, terminal station or reactor station design do not result in any exceedance of the general public EMFI limit and remain consistent with the relevant ICNIRP (2010) requirements at relevant assessment locations, including site boundaries and publicly accessible areas. Where updated design predictions indicate a potential exceedance, the design will be refined to achieve compliance and model to be re-validated	Project-wide for the transmission line, Tragowel Terminal Station and Bulgana Reactor Station. Triggered during detailed design and prior to construction.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Updated EMFI assessment; final design parameters/modelling outputs; design review records	Design; Pre-construction
EMFI02	Design optimisation and electric field screening During detailed design, the Delivery Partner/Principal Contractor will investigate and, where required, apply practicable design optimisation measures to reduce electric and magnetic field levels where there are unacceptable exceedances for the EMFI limits. This can include consideration of increased terminal station bus conductor height and electric field screening at Tragowel Terminal Station and Bulgana Reactor Station where required to achieve compliance with the relevant ICNIRP (2010) requirements.	Site-specific. Triggered during detailed design where modelling identifies limited compliance tolerance or a need for additional design optimisation at terminal station or reactor station infrastructure.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Design optimisation records; modelling updates; design drawings/review	Design

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EMFI03	Low frequency induction and metallic infrastructure safety During detailed design, the Delivery Partner/Principal Contractor will re-assess hazards associated with induced voltages and contact currents on metallic infrastructure, including fences, gates and above- or below-ground services in and within proximity to the final transmission infrastructure location. The detailed modelling will be in accordance with AS/NZS 4853 and to relevant CIGRE guidance relating to induced voltages on metallic infrastructure in transmission line easements and the human shock-response criteria described in IEC TS 60479 Effects of current on human beings and livestock - Part 1: General aspects. Where hazards are identified, design controls will be incorporated into the design as required to reduce risks to acceptable levels. Verification, testing and commissioning will be as per relevant Australian standards.	Site-specific. Triggered during detailed design where metallic infrastructure may be subject to induction effects from Project infrastructure.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Induction/AS/NZS 4853 assessment; design records	Design
EMFI04	Occupational EMFI and AIMD controls The TNSP will implement controls for occupational personnel working in areas where electric and magnetic field levels may be elevated, including within the Tragowel Terminal Station and Bulgana Reactor Station. This will include processes requiring personnel with Active Implantable Medical Devices (AIMDs) to confirm the immunity level of the device with the manufacturer or their doctor before entering areas where elevated EMFI levels may occur or otherwise restricting or controlling access where necessary to maintain safety, including through signage where required.	Site-specific. Triggered during operation, commissioning or maintenance where personnel may access areas where electric and magnetic field levels may be elevated.	Prepare/implement: TNSP	Operational procedures; access control; OHS/training records	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EMFI05	Electromagnetic interference (EMI) and GPS-critical assets During detailed design, the Delivery Partner/Principal Contractor will incorporate best practice design principles that will minimise EMI during normal operation of the transmission line in accordance with relevant standards and guidelines. This will be supported by detailed modelling to predict the level of EMI in the vicinity of transmission assets after incorporation of final design details. During early design stages, critical or sensitive communications equipment (e.g. telecommunications infrastructure or GPS-critical assets) will be identified through community consultation and surveys and assessed on an individual basis to determine if additional management measures are required. This may include site measurements of existing background EMI levels to quantify the impact of the proposed transmission line. The land holder or asset owners will be notified of any residual risks and impacts to be aware of. During operation, the TNSP will be responsible for maintenance and undertaking further field validation where required. Where there are complaints about adverse effects of EMI on farm equipment during operational phase, the TNSP will investigate and identify feasible corrective actions that can be implemented by the TNSP to address the complaint.	Site-specific. Triggered where GPS-critical assets or activities are identified as potentially sensitive to indirect EMFI effects during detailed design or operation.	Prepare/implement: Delivery Partner/Principal Contractor during design; TNSP during operation Review/accept: VicGrid VNI West during design; TNSP during operation	Validation and stakeholder consultation; monitoring; response/control records	Design; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
EMFI06	Existing reactor site measurements EMFI measurements from an existing reactor installation of comparable voltage level, rating and physical size should be obtained, where available, to provide a benchmark for, and support validation of, the detailed EMFI modelling undertaken during the detailed design phase. Final EMFI levels and any associated exclusion zones should be confirmed based on the selected reactor design and site-specific assessment.	Site-specific. Triggered during detailed design for the Bulgana Reactor Station.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Updated EMFI assessment; final design parameters; modelling outputs; design review records; audit findings	Design; Pre-construction
Geology and soils					
GS01	Pre-construction geotechnical and soil investigation Prior to the commencement of construction, the Delivery Partner/Principal Contractor will undertake geotechnical and soil investigations to confirm relevant subsurface conditions and identify saline, dispersive and potentially acid sulfate soils, particularly in those areas identified in EES Technical Appendix B: Geology and soils as being of higher risk of being acid-forming, or where soil conditions may affect construction, reinstatement, rehabilitation, erosion risk or agricultural productivity. Investigations will be sufficient to inform detailed design, construction methodology, microsites where required, and relevant management plans required under GS02 to GS07. Where contamination is suspected or identified, assessment will be undertaken having regard to the National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended, and relevant EPA Victoria guidance.	Project-wide , with site-specific application. Required prior to detailed design finalisation and ground disturbance, and where geotechnical or soil conditions may affect construction, reinstatement, rehabilitation, erosion risk, contamination risk or agricultural productivity.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West Specialist input: suitably qualified geotechnical, soil, contamination, ecology or heritage specialists where relevant	Geotechnical/soil/contamination investigations; baseline agricultural soil records where relevant; design/microsites inputs	Design; Pre-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Prior to ground disturbance, a visual site assessment will be undertaken to identify potential indicators of contamination or point sources of contamination, including infrastructure or landforms that may indicate former sheep dips, animal burial areas, localised landfilling, mounding, depressions, staining, odour, waste material or other potentially contaminated areas. Where works are proposed on agricultural land, investigations will establish baseline soil condition relevant to reinstatement and rehabilitation, including where relevant soil structure, compaction, topsoil depth, drainage, salinity, sodicity/dispersivity, fertility indicators and productive capacity. Baseline information will be used to inform soil handling, reinstatement criteria and rehabilitation outcomes required under GS02, GS04 and GS06. Where investigation outcomes identify constraints that may affect ecological, cultural heritage, surface water, groundwater or agricultural values, the findings will be provided to the relevant specialists and used to inform design refinement, access planning, micro-siting and management controls. Where GS01 investigations identify contamination, acid sulfate soils or soil conditions that may affect surface water, groundwater, native vegetation, groundwater-dependent ecosystems, waterways, wetlands or other ecological values, the findings will be used to inform relevant controls required under EPRs: SW01, GW01, EC01, EC02, and other relevant ecology EPRs where applicable.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
GS02	Saline and Dispersive Soils Management Plan (SDSMP) Where saline or dispersive soils are identified through GS01 investigations or encountered during works, prior to the commencement of relevant works, the Delivery Partner/Principal Contractor will develop and implement an SDSP as a sub- plan under the CEMP to avoid and minimise erosion, sedimentation, instability, degradation of soil structure and reinstatement risks. Project activities will be managed so that they do not result in a measurable increase in erosion, sedimentation or degradation of soil structure, so far as reasonably practicable, having regard to pre-construction soil condition and the nature of the affected land use. The SDSP will include a framework for managing saline and dispersive soils during construction, including tower footing construction, soil stripping, stockpiling, handling, compaction management, profiling, drainage erosion control and reinstatement. For agricultural land, the plan will use baseline soil condition information collected under GS01 to inform reinstatement and rehabilitation requirements, including soil profile reinstatement, topsoil replacement, compaction remediation, erosion control, drainage reinstatement and measures to support the productive capacity of the land. The plan will be prepared having regard to best practice guidance including: • EPA Victoria Publication 1828.3 Waste disposal categories – characteristics and thresholds • EPA Victoria Publication 1894 Managing soil disturbance • EPA Victoria Publication 1834.2 Civil construction, building and demolition guide. • IECA Best Practice Erosion and Sediment Control for building and construction sites, 2025	Project-wide, where triggered. Applies where saline or dispersive soils are identified through GS01 investigations or encountered during works.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	SDSMP; baseline soil records; inspections; reinstatement/erosion monitoring	Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	relevant Earth Resources Victoria guidance regarding compaction management, profiling and erosion control during reinstatement. Where saline or dispersive soils may affect waterways, drainage lines or offsite sediment movement, controls will be coordinated with SW01 Surface Water Management Plan and relevant erosion and sediment control requirements.				
GS03	Acid sulfate soil assessment Prior to the commencement of works in areas with mapped or potential acid sulfate soil risk, or where indicators of potential acid sulfate soils are identified, the Delivery Partner/Principal Contractor will undertake an acid sulfate soil assessment to determine the presence, extent and management requirements of acid sulfate soils. The assessment will include field studies and laboratory analysis where required having regard to the level of risk, proposed disturbance depth, soil type, groundwater conditions, drainage environment and indicators of potential acid sulfate soils. The assessment will be undertaken in accordance with relevant guidance, including: - EPA Victoria Publication 655: Acid sulfate soil and rock - Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soil, 2010 - National Acid Sulfate Soil Guidance: Sampling and Identification Methods Manual - National Acid Sulfate Soil Guidance: Identification and Laboratory Methods Manual - National Acid Sulfate Soil Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments, where relevant.	Site-specific. Triggered where works are proposed in areas with mapped or potential acid sulfate soils, including relevant swamp, lake, alluvial or drainage environments, or where indicators of potential acid sulfate soils are identified in accordance with relevant national acid sulfate soil guidance.	Prepare: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Assessment/field investigations; laboratory results; design/management plan inputs	Design; Pre-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Where works are proposed on agricultural land, the assessment will consider implications for agricultural soil condition, soil chemistry, soil structure, productive capacity and reinstatement requirements. The assessment will inform detailed design and determine whether a specific management plan is required under GS04. Where the acid sulfate soil assessment identifies potential risks to surface water, groundwater, native vegetation, groundwater-dependent ecosystems, waterways, wetlands or other ecological values, the assessment outcomes will be used to inform relevant controls required under GS04 Acid Sulfate Soil Management Plan, SW01 Surface Water Management Plan, GW01 Groundwater Management Plan, EC01, EC02 Construction Vegetation and Habitat Management Plan, and other relevant ecology EPRs where applicable.				
GS04	Acid Sulfate Soil Management Plan (ASSMP) Where acid sulfate soils are identified through GS03 or encountered during works, prior to the commencement of relevant works the Delivery Partner/Principal Contractor will develop and implement an Acid Sulfate Soil Management Plan (ASSMP), as a sub-plan of the CEMP. Prior to decommissioning, the relevant delivery entity will review and update the ASSMP, where required, for that phase. The purpose of the ASSMP is to ensure acid sulfate soils are managed to avoid and minimise acid generation, contaminated runoff, impacts to groundwater or surface water, offsite impacts, degradation of soil condition and long-term impacts to agricultural land use.	Site-specific. Triggered where acid sulfate soils are identified through GS03 or encountered during works.	Prepare/implement: Delivery Partner/Principal Contractor (construction); Principal Contractor for decommissioning Review/accept: VicGrid VNI West (construction); TNSP/decommissioning delivery entity (decommissioning)	ASSMP; inspection/treatment records; disposal and incident records	Pre-construction Construction Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The ASSMP will include monitoring, trigger levels and contingency measures to detect and respond to acid generation, leachate, contaminated runoff, dewatering impacts or other offsite impacts. The ASSMP will include, at a minimum: • procedures for excavation, handling, stockpiling and treatment of acid sulfate soils • controls for runoff, dewatering and containment, where required • procedures for identifying and managing unexpected acid sulfate soils, including Project-relevant visual and olfactory indicators of potential acid sulfate soils, with supporting photographs or guidance material where practicable, to be developed by a suitably qualified specialist • procedures for management of unexpected acid sulfate soils, including stop-work, isolation, assessment, treatment and corrective action • offsite transport and lawful disposal requirements where onsite management is not appropriate • training, monitoring and corrective action requirements • reinstatement and rehabilitation requirements for agricultural land, including soil chemistry, soil structure, soil profile reinstatement, drainage and productive capacity where relevant • requirements for specialist input and design refinement or micro-siting where acid sulfate soil management may affect ecological, cultural heritage, surface water, groundwater or agricultural values. The ASSMP will be prepared in accordance with relevant guidelines and regulations, including: • EP Act • EP Regulations • Industrial Waste Management Policy (Waste Acid Sulfate Soils)				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- EPA Victoria Publication 655: Acid Sulfate Soil and Rock - Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soil (CASS BPMG, 2010). - National Acid Sulfate Soil Guidance: Sampling and Identification Methods Manual - National acid Sulfate Soil Guidance: Identification and Laboratory Methods Manual - National Acid Sulfate Soil Guidance: Guidance for the dewatering of acid sulfate soils in shallow groundwater environments, where relevant - Australian Standards 4969 Analysis of Acid Sulfate Soil. Where acid sulfate soil management controls may affect surface water, groundwater, native vegetation, groundwater-dependent ecosystems, waterways, wetlands or other ecological values, the ASSMP will be coordinated with relevant controls required under SW01, GW01, EC01, EC02, and other relevant ecology EPRs where applicable.				
GS05	Hazardous Materials Management Plan (HMMP) Prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement a HMMP as a sub-plan of the CEMP to manage fuels, chemicals and other hazardous materials. Prior to operation and decommissioning, the relevant delivery entity will review and update the HMMP, where required, for those phases. The HMMP will include, at a minimum: storage of bulk fuel in self-bunded tanks in accordance with relevant Australian standards (AS1940-2017 and AS1692-2006)	Project-wide. Triggered where hazardous materials are stored, handled, transported or used.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Accept: VicGrid VNI West (construction); TNSP (operation)	HMMP; hazardous materials register; inspections; spill/incident records	Construction Operation Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- hazardous materials, fuels and liquids to be stored and handled having regard to EPA Victoria Publication 1698: Liquid storage and handling guidelines, including appropriate containment, transfer, inspection and spill response controls - refuelling or maintenance of equipment, machinery and vehicles will be conducted at least 20 metres or as far away as is reasonably practical from any waterway with appropriate measures to contain spills - store hazardous materials in ventilated, self-bunded and secured containers in accordance with the OHS Act and OHS Regulations - storage of dangerous goods in accordance with the Dangerous Goods (Storage and Handling) Regulations 2012 and the code of practice for the storage and handling of dangerous goods - routine and scheduled maintenance of vehicles, plant, machinery, equipment to minimise the potential for leaks/spills - spill kits and firefighting equipment with the chemicals required by legislation - dangerous goods and hazardous materials register and current safety data sheets (SDSs) - transformers to be filled only following installation of bunds to prevent discharge of oils during filling.				
GS06	Waste and Contaminated Soil Management Plan (WCSMP) Prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement a WCSMP as a sub-plan of the CEMP to manage spoil, waste, contaminated soils and unexpected contamination. Prior to operation and decommissioning the relevant delivery entity will review and update the WCSMP, where required, for those phases.	Project-wide, with site-specific application. Triggered where spoil, waste, contaminated soil or unexpected contamination is encountered or generated.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation, if required); Principal Contractor for decommissioning	WCSMP; spoil/waste and contamination records; waste tracking; incident records	Pre-construction; Construction Operation Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The purpose of the plan is to ensure that spoil, waste and contaminated soils are managed, transported, reused, treated or disposed of in accordance with statutory requirements, the waste hierarchy and relevant EPA Victoria guidance, and to prevent environmental harm. The WCSMP will include, at a minimum: • procedures for classification, handling, stockpiling, reuse and lawful disposal of spoil and waste soils • requirements to manage, retain and reinstate productive topsoil so far as reasonably practicable, including segregation of topsoil and subsoil, protection of soil structure, prevention of contamination, minimisation of compaction, and reinstatement of soil profiles to support ongoing agricultural use • Management of potentially contaminated soils in former mining areas, including tailings-affected soils where relevant. • a soil reuse hierarchy that prioritises reuse of soil within the same parcel of land where suitable and lawful, identifies offsite reuse options where appropriate and possible, and identifies disposal locations that may provide community or environmental benefit where lawful and appropriate • controls to minimise runoff, erosion and offsite movement of stockpiled materials • requirement for stockpiled soils to be located at least 50 metres away from watercourses, where practicable, or otherwise managed with controls to prevent runoff, erosion or sedimentation • a visual site assessment prior to works commencing to identify indicators of potential contamination sources, including infrastructure or landforms that may indicate former sheep dips, animal burial areas, localised landfilling, mounding, depressions, staining, odour, waste material or other potentially contaminated areas		Accept: VicGrid VNI West (construction); TNSP (operation)		

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• a contaminated land unexpected finds protocol, including procedures for identifying, isolating and responding to unexpected or unknown contamination, cessation of disturbance in the affected area, assessment by suitably qualified personnel, and implementation of appropriate management, treatment, reuse or disposal measures • requirements for sampling, assessment and specialist advice where contamination is identified • management of potentially contaminated soils in agricultural areas, including pesticide or herbicide-affected soils where relevant • waste hierarchy requirements and management of general and regulated waste streams • site-specific requirements for areas of known or potential contamination, including Laydown Area 3 where relevant • documentation, waste tracking, monitoring and corrective action requirements • procedures for storage and segregation of general Project organic and recyclable wastes, in accordance with GG03, to ensure waste is not accessible to pest animals and is disposed of at a lawful facility. The plan will be prepared having regard to relevant EPA Victoria guidance and regulations for sampling, classification, reuse and disposal of waste soils, including EPA Victoria Publications 1828.3 and 702.2. Where contaminated soil, waste soil or unexpected contamination may affect surface water, groundwater, native vegetation, groundwater-dependent ecosystems, waterways, wetlands or other ecological values, the WCSMP will be coordinated with relevant controls required under SW01, GW01, EC01, EC02, and other relevant ecology EPRs where applicable.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
GS07	Encountering brackish or unknown groundwater contamination The Delivery Partner/Principal Contractor will manage groundwater (brackish or fresh) that may be displaced during the construction activities in accordance with an approved Groundwater Management Plan (GMP) required under GW01. The GMP will be implemented and will include the following controls to manage risks to human health and the environment, including: - groundwater disturbance activities will cease at the area of unexpected or unknown contamination and within the immediate vicinity - assessment of the contamination will be undertaken, with appropriate sampling, analysis and characterisation in accordance with EP Act, subordinate regulations and relevant EPA Victoria guidelines - appropriate actions, including lawful disposal of waste will be implemented. If required, the investigation of unexpected or unknown contamination will be undertaken in accordance with the relevant EPA regulations and with the ASC NEPM (2013).	Site-specific: Where groundwater is displaced during construction or where brackish or unknown groundwater contamination is encountered.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	GMP; contamination assessment; disposal records; incident/corrective action records	Construction
Greenhouse Gas					
GG01	Greenhouse Gas Management Plan (GHGMP) VicGrid VNI West will develop and implement a GHGMP for the Project to provide a framework for identifying, reducing, monitoring and managing greenhouse gas emissions across the Project lifecycle. The GHGMP will:	Project-wide. Triggered throughout design refinement and updated as required for construction, operation and decommissioning.	Prepare/implement: VicGrid VNI West during design; Delivery Partner/Principal Contractor during construction; TNSP during operation; Principal Contractor for decommissioning during decommissioning	GHGMP; emissions/target tracking; offset procurement records where relevant	Design; Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- provide a clear framework for identifying, reducing, monitoring, reporting and managing emissions across the Project lifecycle, particularly during design and procurement - embed greenhouse gas emissions considerations into design and delivery - include emission reduction targets - identify roles, responsibilities, reporting requirements and review processes for greenhouse gas management - document how design, procurement, construction, operation and decommissioning greenhouse gas reduction measures required under GG02 and GG03 will be implemented, monitored and reported - set out the process by which the purchasing of certified carbon offsets to compensate for emissions during construction and operation will be achieved following the application of the design and operational greenhouse gas reduction requirements set out in GG02 and GG03. Offsets will only be used as a last resort for residual emissions that cannot reasonably be avoided or minimised. Any offsets purchased for the Project will be certified carbon offsets aligned with recognised offset standards.		Review/accept: VicGrid VNI West for design and construction; TNSP for operation		
GG02	Environmentally Sustainable Design During the design phase, VicGrid VNI West will integrate sustainable design practices into the design process to minimise, to the extent practicable, greenhouse gas emissions arising from the construction, operation and decommissioning of the Project. These practices will consider:	Project-wide. Triggered throughout design refinement and procurement planning.	Prepare/implement: VicGrid VNI West Support: Delivery Partner/Principal Contractor where relevant during design development and procurement	GHGMP; design option assessments; procurement/material selection records	Design

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- choice of easement options such that where options exist for the easement alignment, ensure that the potential GHG emissions of each option are considered in the decision-making process, together with other relevant factors. - the use of low embodied carbon materials and locally sourced materials, where practicable. - the criteria for the minimum proportion of supplementary cementitious material content which will be used in concrete. - the use of recycled steel, and recycled aggregates. - the location from which materials are being sourced in order to minimise associated transport emissions. - use of low maintenance and durable materials where practicable to avoid unnecessary replacement. - sustainable procurement and resource management practices, in accordance with ISO 20400:2017 Sustainable procurement, to avoid the inefficient use of materials, fossil fuels and electricity. - energy efficiency performance standards for the tendering of works associated with plant and equipment. - design refinement which will reduce the total quantum of materials and incorporate reuse of materials during construction and operation of the Project - opportunities to align sustainable design and procurement outcomes with relevant business, local procurement and social procurement EPRs.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Greenhouse Gas Management Plan required under GG01 will document how these sustainable design practices have been considered and implemented, including relevant design decisions, procurement criteria, emissions reduction opportunities, reasons where opportunities are not adopted, and reporting requirements.				
GG03	Reduction of greenhouse gas emissions during construction, operation and decommissioning The Principal Contractor, TNSP and Principal Contractor for decommissioning will minimise greenhouse gas emissions during construction, operation and decommissioning to the extent practicable, in accordance with the GHGMP. This will include, where practicable: • inspecting the quality of key materials before supplying them to site to avoid additional transport and handling of materials. • the use of locally sourced plant and equipment (i.e. within Victoria) where practicable to reduce transport-related emissions associated with transport. • include sourcing of local plant and equipment where practicable in the selection criteria for tendering of works associated with plant and equipment. • coordinating construction activities, where practicable, to reduce unnecessarily extending the construction period and to avoid inefficient use of equipment. • engaging local workforce, where practicable and minimising interstate and international travel. • completing a transport plan to detail how fuel emissions from employee transport will be minimised. This will include a training program to upskill the local workforce.	Project-wide. Triggered by requirements of the GHGMP.	Prepare/implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Accept: VicGrid VNI West (construction); TNSP (operation)	GHGMP; implementation/ procurement/ transport records; waste/material use and emissions tracking	Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- selecting plant and equipment with regard to fuel efficiency to reduce the consumption of fossil fuels, including the use of electric vehicles, where practicable. - developing a waste management plan, in accordance with GS06 that considers waste reduction, segregation of waste, and disposal of waste to ensure that waste is correctly separated and diverted from landfill where appropriate. - implementing safety controls and emergency management practices in the case of unplanned activities, incidents and emergencies to minimise the release of fugitive GHG emissions. - procedures to reduce GHG emissions as a result of asset management through the incorporation new technologies, reducing replacement through maintenance, and utilising future lower-emission materials and construction methods for maintenance and replacement - recording and reporting implementation of greenhouse gas reduction measures in accordance with the Greenhouse Gas Management Plan - identifying opportunities to align construction, operation and decommissioning emission reduction measures with relevant business, local procurement and social procurement EPRs.				
Groundwater					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
GW01	Groundwater Management Plan (GMP) Prior to commencement of Project construction, the Principal Contractor will develop and implement a Groundwater Management Plan (GMP) as a sub-plan under the CEMP to minimise groundwater impacts. The GMP will be prepared in consultation with EPA and relevant water authorities and consider the requirements of EPA Victoria Publication 668.1 October 2022: Hydrogeological Assessment. The GMP will also be prepared in consultation with relevant Traditional Owner groups where groundwater management intersects with cultural values, waterways, wetlands, groundwater-dependent ecosystems, restoration opportunities, monitoring opportunities, or Traditional Owner land and water management interests. Prior to the commencement of both operation and decommissioning, the GMP will be updated, where required, and implemented as a sub-plan under the OEMP and DEMP (respectively) to minimise groundwater impacts during these phases. The GMP will identify groundwater receptors and environmental values that may be affected by Project activities, including where relevant registered and unregistered groundwater wells (including agricultural groundwater use, irrigation bores, stock water supplies and State Observation Network bores), groundwater-dependent ecosystems, and groundwater environmental values identified under the Environment Reference Standard. The GMP will also include, at a minimum: • roles, responsibilities, record keeping requirements and audit requirements for groundwater management • procedures for identifying, assessing and managing unexpected or unknown contamination	Site specific: Required where design, construction, operation or decommissioning activities may affect groundwater, and informed by the requirements and outcomes of GW02, GW03 and GW04.	Prepare: Delivery Partner/Principal Contractor (construction); TNSP (operational update, where required); Principal Contractor for decommissioning Implement: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Review/accept: VicGrid VNI West (construction); TNSP (operation)	GMP; regulator, Traditional Owner and groundwater-user consultation/ notification records; receptor/dewatering assessments; sampling and monitoring records; incident/corrective action records	Pre-construction; Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- the requirement for the preparation of a sampling, analysis and quality plan in the event that contamination is identified - contingency measures in the event that contamination is identified - controls outlined in EPA Victoria Publication 1834.2: Civil construction, building and demolition guide, as relevant to erosion, sediment, contaminated land and contaminated groundwater, chemicals and waste, including controls for the collection, containment and transport of groundwater or slurry discharged or displaced from below-ground construction - controls outlined in EPA Victoria Publication 1698: Liquid storage and handling guidelines and EPA Victoria Publication 1700: Preventing liquid leaks and spills from storage and handling systems, including secondary containment, safe transfer methods and spill response measures to prevent migration of liquid to the water table - refuelling or maintenance of equipment, machinery and vehicles would be conducted at least 20 metres or as far away as is reasonably practical from any waterway with appropriate measures to contain spills - controls for management of acid sulfate soils, where relevant, in accordance with EPA Victoria Publication 655: Acid sulfate soil and rock - provision of access arrangements to DEECA where State Observation Bore Network bores are located within a fenced construction area				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- dewatering protocols, where dewatering may be required for towers or terminal stations, including review of geotechnical conditions, estimation of drawdown and extraction volumes, identification of receptors and sensitive sites within the expected cone of depression, investigation where uncertainty or risk is high, field monitoring before, during and after dewatering, and site-specific mitigation, inflow and discharge and groundwater drawdown - processes for identifying and managing potential impacts on agricultural groundwater users, including irrigation bores and stock water supplies, where groundwater drawdown or groundwater quality change may affect agricultural use - procedures for notifying and consulting affected groundwater users where monitoring or assessment identifies a potential impact to groundwater availability or quality - opportunities for Traditional Owner participation in groundwater monitoring, restoration or land and water management activities where relevant and agreed with the relevant Traditional Owner group - review and update procedures where monitoring, audit findings, complaints, incidents or changes in work methods indicate that additional or modified controls are required. The GMP will specify the controls required to avoid or minimise risks to the environmental values of groundwater, in accordance with the ongoing obligations under the General Environmental Duty and the indicators and objectives of the Environment Reference Standard (EPA 2022), and will give effect to GW02, GW03 and GW04.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
GW02	Groundwater impact assessment for GDEs Following detailed design and prior to the commencement of construction, the Delivery Partner/Principal Contractor will undertake a site-specific groundwater impact assessment for any transmission towers located less than 10 metres from a potential GDE (terrestrial or aquatic) or waterbody (including waterways, spring, and wetlands). Potential groundwater-dependent ecosystems and waterbodies will be identified having regard to the EES groundwater and ecology assessments, updated ecological surveys, site inspections, groundwater information and any other relevant information available during detailed design. This site-specific groundwater assessment will include, where relevant: • characterisation of the groundwater connection to the GDE and/or waterbody • assessment of potential impacts on groundwater levels, flows, quality and availability • identification of groundwater receptors and environmental values that may be affected, including agricultural groundwater use where relevant • consideration of whether the spatial extent of assessment needs to extend beyond the immediate tower location to capture potential drawdown, connectivity or receptor impacts • required controls to avoid or minimise impacts • monitoring requirements before, during and after the relevant works • trigger levels and contingency measures for corrective action • notification or consultation requirements for affected groundwater users or relevant authorities where required.	Site specific: Required where transmission towers are located less than 10 metres from a potential GDE or waterbody, or where site-specific assessment identifies potential groundwater impacts to receptors or environmental values.	Prepare/implement: Delivery Partner/Principal Contractor during detailed design and construction Accept: VicGrid VNI West	Site-specific groundwater assessment; GMP/work method updates; dewatering and monitoring records; trigger exceedance/corrective action records	Design; Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The outcomes of the site-specific groundwater impact assessment, including required controls, monitoring requirements, trigger levels and contingency measures, will be incorporated into the GMP and relevant work method documentation and implemented before and during the relevant works. Implementation of the required controls and monitoring will be verified through groundwater monitoring records, dewatering records, discharge/disposal records, inspection records, corrective action records and audit findings. A terrestrial GDE will only trigger this EPR if it is not subject to vegetation clearance during construction.				
GW03	Avoid aquifer connection Following detailed design and prior to the commencement of construction, a suitably qualified person will review the pile location and construction methodology to assess whether there is potential for aquifer interconnection to occur. The review will consider potential impacts on groundwater levels, flow paths, groundwater quality and groundwater availability, including where relevant groundwater used for irrigation, stock watering or other agricultural purposes. If there is potential for aquifer interconnection, then the pile construction methodology will be reviewed and updated, if necessary to minimise aquifer interconnection so far as reasonably practicable and demonstrate that any residual risk of aquifer connectivity is appropriately controlled. Where drilling across aquifers is required, drilling will be undertaken by a driller holding the required Victorian drilling licence class. Where required, controls will be documented in the GMP and relevant construction method documentation.	Project-wide: Required where wells, aquifers or groundwater receptors are present and where tower locations or other Project infrastructure involve piling or below-ground works with potential for aquifer interconnection.	Prepare/implement: Delivery Partner/Principal Contractor during detailed design and construction Accept: VicGrid VNI West	GMP; pile/ methodology review; groundwater/ geotechnical design and residual risk records; licence/design updates where required	Design; Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
GW04	Completion of well survey Prior to the commencement of construction, existing groundwater wells within approximately 100 metres of all construction areas will be surveyed to confirm their location, access arrangements, apparent condition and functionality, including any unregistered wells identified through consultation, desktop review or site inspection. Details of groundwater well locations, access, condition and functionality will be documented in the GMP to ensure wells are adequately protected. Appropriate protections will be installed around each groundwater well prior to the commencement of construction where required to avoid damage or loss of access. Any groundwater well damaged by Project works will be repaired or replaced by the construction contractor as necessary. This process will be captured in the GMP and documented through repair/replacement records.	Site-specific: Required for existing registered and unregistered groundwater wells within approximately 100 metres of construction areas, prior to construction in the relevant area	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Well survey; landholder consultation; bore condition/protection records; repair/replacement records where required	Pre-construction; Construction where required
Historical heritage					
HH01	Site card submissions Where a site card is required under section 127 of the <i>Heritage Act 2017</i> (Vic), VicGrid VNI West will ensure the relevant site card is prepared and submitted to Heritage Victoria for determination. Based on the historical heritage assessment, site cards will be submitted for the following features: • Feature N12 • Feature N13 • Feature S030 VicGrid VNI West will respond to Heritage Victoria requests for further information and will complete the relevant Heritage Victoria process prior to works commencing in the area to which the site card relates.	Site-specific. Required where identified features require submission to Heritage Victoria for determination and potential Victorian Heritage Inventory listing, and where additional historical heritage features are identified that require a site card.	Prepare: suitably qualified heritage specialist Submit/manage process: VicGrid VNI West Support: Delivery Partner/Principal Contractor; TNSP; Principal Contractor for decommissioning, where relevant Determine: Heritage Victoria	Site card submissions; heritage specialist records; Heritage Victoria correspondence/determinations	Design; Pre-construction; Construction; Operation where relevant; Decommissioning where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Where additional historical heritage features are identified during design, construction, operation or decommissioning and a site card is required under the Heritage Act 2017, VicGrid VNI West will ensure an additional site card is prepared and submitted to Heritage Victoria for determination.				
HH02	Exclusion zones Project works will avoid ground disturbance within historical heritage features assessed as having greater than low level potential for historical heritage significance or meeting either Threshold A or Threshold B heritage values, through the establishment and maintenance of exclusion zones, irrespective of whether the feature is ultimately listed. Exclusion zones will be established for: • Feature N12 around the two rail bridges • Feature N13 around all recorded standing structures within the survey feature extent • Feature S030 around the footprint of potential subsurface historical heritage associated with Swanwater Railway Station • Feature S035 around the footprint of the noted structural features, including the hut and sheds • Feature S021 around the extent of the original structures • Features S024 and S025 around the possible location of the two bridges • Feature S033 around the extent of any potential original structures.	Site-specific. Required where known historical heritage features with greater than low level potential for historical heritage significance, or otherwise identified, are present or where access tracks/works may otherwise encroach on those areas.	Prepare/implement: Delivery Partner/Principal Contractor (design and construction); TNSP (operation, where relevant); Principal Contractor for decommissioning Specialist input: suitably qualified heritage specialist Approve/consent: Heritage Victoria where required	Exclusion zone mapping; heritage specialist advice; fencing/signage; permits/consents where required	Design; Pre-construction; Construction; Operation where relevant; Decommissioning where relevant

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The extent of each exclusion zone, including the setback between the heritage feature and the exclusion zone boundary, will be determined by a suitably qualified heritage specialist having regard to the nature, extent, sensitivity and significance of the feature, the potential for subsurface deposits, the type of works proposed, and the risk of direct or indirect disturbance. Exclusion zones will be: • confirmed through on-ground investigation, where access is available • designated on Project mapping • fenced during the pre-construction and construction phases where works are occurring nearby • clearly signed • communicated to relevant personnel through induction, toolbox briefings and work method documentation. If works are required within a designated exclusion zone for a place listed on the Victorian Heritage Inventory, the Project will obtain any consent or consent exemption required under the <i>Heritage Act 2017</i> (Vic) before those works commence. Access tracks will also avoid, where practicable, areas of documented historical heritage identified in the historical heritage assessment.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
HH03	Unexpected Finds Protocol Prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement an Unexpected Finds Protocol for historical heritage as part of the CEMP. The Unexpected Finds Protocol will include procedures for managing unexpected historical heritage finds during construction, operation or decommissioning works. The protocol will include, at a minimum: • roles and responsibilities • notification and escalation requirements • assessment of the find by a suitably qualified heritage specialist • requirements for consultation with Heritage Victoria where required • site protection and recommencement requirements • visual examples of typical unexpected finds • requirements to obtain any necessary permit, consent, consent exemption or other approval before works recommence where required under the <i>Heritage Act 2017</i> • criteria and authority for recommencement of works • documentation requirements for recording finds • procedures to be followed if bone finds are discovered • procedures to be followed if suspected human remains are discovered • procedures to be followed if historical artefacts or buried structural features are discovered • recording, reporting and close-out requirements.	Project-wide, with site-specific application. Required prior to construction and applies where unidentified historical heritage is identified during construction, operation or decommissioning works.	Prepare: Delivery Partner/Principal Contractor (construction); TNSP (operation); Principal Contractor for decommissioning Specialist input: suitably qualified heritage specialist Approve/consent: Heritage Victoria where required	Unexpected Finds Protocol; stop-work/isolation records; specialist assessment and Heritage Victoria records; recommencement/close-out records	Pre-construction; Construction; Operation where relevant; Decommissioning
HH04	Historical heritage induction Prior to any ground-disturbing works, all relevant Project personnel will complete a historical heritage induction in accordance with the CEMP.	Project-wide. Triggered prior to any ground-disturbing works.	Prepare: Delivery Partner/Principal Contractor	Induction/toolbox records	Construction; Operation where relevant; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The induction will: • be delivered by a suitably qualified archaeologist • include historical background to the area and the types of archaeological deposits, features and artefacts that may be encountered • explain the process for reporting discoveries • explain the relevant legal obligations and penalties under applicable legislation. Refresher induction or awareness material will be provided where required, including where personnel are working in areas with identified historical heritage sensitivity, where work methods or locations change, where an unexpected find has occurred, or where monitoring, audit findings or non-compliance indicate that refresher training is required. A summary of the induction will be made available to personnel undertaking Project works, including through posters or similar material displayed in relevant work areas.		Deliver: suitably qualified archaeologist Implement: Delivery Partner/Principal Contractor; TNSP where relevant; Principal Contractor for decommissioning		
Landscape and visual					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
LV01	Landscape screening for the laydown and workforce accommodation Prior to the commencement of construction of laydown areas and workforce accommodation sites, Delivery Partner/Principal Contractor will offer perimeter landscape screening or other suitable visual screening treatment, where practicable, to reduce visual impacts from public viewpoints and surrounding public-facing locations. Where the relevant landholder agrees to the proposed screening treatment, the Project will implement the approved landscape screening or visual screening treatment. Offers will include the costs to supply, install, monitor and maintain the approved landscape screening treatment for the duration of use of the laydown area or workforce accommodation site, and will be subject to landholder agreement. Landscape screening or visual screening treatment will be designed having regard to: • bushfire safety requirements, including Asset Protection Zones • sight distance requirements for site access • landscape character • the need to use appropriate species, materials and planting layouts suited to the site context • opportunities for Traditional Owner input into planting design, species selection and cultural landscape values where relevant and agreed through Traditional Owner engagement processes. Where landscape screening is proposed, the design will identify the intended visual mitigation outcome, including whether the treatment is expected to reduce the relevant public-domain visual impact rating to moderate or below, where practicable, having regard to <i>Appendix J: Landscape and visual impact assessment</i>.	Site-specific. Triggered during detailed design and implementation of the laydown areas and workforce accommodation sites where perimeter screening or other visual screening treatment is practicable, agreed by the landholder and would assist in reducing public-domain visual impact.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West Agree: relevant landholder where screening is proposed on landholder land	Offer/agreement records; landscape design/visual outcome records; planting and maintenance monitoring	Design; Pre-Construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Where the intended visual mitigation outcome cannot reasonably be achieved, the reason will be documented.				
LV02	Visual mitigation for public locations During detailed design, Delivery Partner/Principal Contractor will identify public locations and community or recreation facilities where the final Project design would result in moderate or higher overall visual impact, as identified in Appendix J: Landscape and visual impact assessment, and consult with the relevant landholder and/or land manager regarding practicable visual mitigation measures. This EPR will apply to relevant public locations identified through Appendix J: Landscape and visual impact assessment and will include, at a minimum: • confirmation of sensitive viewpoints based on the final detailed design • consideration of practicable visual management measures, including landscape screening and/or reconfiguration or relocation of public-facing amenities where appropriate • consideration of landscape character, site context, existing vegetation and public use of the location • consideration of opportunities for Traditional Owner input into planting design, species selection and cultural landscape values where relevant and agreed through Traditional Owner engagement processes • identification of the intended visual mitigation outcome, including whether the measure is expected to reduce the relevant public-domain visual impact rating to moderate or below, where practicable • implementation of agreed measures, where access and necessary authorisations are granted by the relevant landholder and/or land manager, within 24 months of completion of construction of the relevant Project infrastructure	Location-specific. Triggered where public locations or community/recreation facilities are identified as having moderate or higher residual visual impact from the final Project design.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West Consult: relevant landholders/land managers; relevant Traditional Owner groups Agree: relevant landholder/land manager, where required	Consultation and visual mitigation assessments; offer/agreement records; implementation and 24-month maintenance records	Design; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- where planting forms part of the agreed mitigation, the need to use appropriate species, materials and planting layouts suited to the site context - maintenance of the planting by the proponent for a period of 24 months from the time of planting, after which maintenance responsibility passes to the relevant landholder and/or land manager unless otherwise agreed - monitoring of plant establishment, plant health, plant size and growth rate/vigour during the maintenance period.				
LV03	Landscape screening program for eligible dwellings Prior to the commencement of operation, Delivery Partner/Principal Contractor will develop and implement a landscape screening program for eligible dwellings to provide offers for landscape screening that would minimise visual impacts from the Project. The program will: - set out the process for informing eligible land title holders about the program and making offers for landscape screening, including the timeframe within which offers will be made and accepted - set out the methodology for determining eligibility to participate in the program - explain the rationale for the 3.5 kilometre eligibility threshold, including that the threshold is a conservative program eligibility screen and that eligibility is also dependent on visibility of Project infrastructure from the dwelling or attached private open space - require site-specific assessment by a suitably qualified landscape architect or other suitably qualified person for eligible dwellings where the land title holder elects to participate	Property-specific. Triggered where dwellings meet the eligibility criteria for participation in the screening program. The program will be developed prior to operation, with offers made within a defined timeframe following completion of construction of the nearest visible Project infrastructure.	Prepare/implement: Delivery Partner/Principal Contractor; TNSP, as relevant Review/accept: VicGrid VNI West Agree: eligible land title holder Specialist input: suitably qualified landscape architect and suitably qualified bushfire risk consultant	Program/eligibility assessments; offer records; landscape plans; implementation and two-year monitoring records	Design; Construction; Pre-Operation; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- require preparation of a draft landscape plan for each participating eligible dwelling, including proposed planting locations, species, plant quantities, plant spacing/densities, maintenance requirements and expected visual mitigation outcome - provide the draft landscape plan to the eligible land title holder for review and comment - require the final landscape plan to be agreed with the eligible land title holder before implementation - include monitoring, maintenance, replacement planting and reporting requirements to verify establishment and support the effectiveness of screening. Eligible land title holders will include those that meet the following criteria: - they have elected to participate in the program - the dwelling is located within 3.5 kilometres of the approved Easement or Project infrastructure, and on a property not directly affected by the Project; and - Project infrastructure is visible from habitable rooms within the dwelling and/or main entrances/exits to the dwelling and/or attached areas of private open space within the curtilage of the dwelling. For dwellings on directly affected properties, any landscape screening measures are to be considered through developing the relevant Property Management Plan under AG01, rather than through this program. The program will also: - provide for an offer to eligible land title holders that includes the costs to supply, install, monitor and maintain the approved landscape screening treatment for a period of 24 months from the time of planting, after which maintenance responsibility passes to the relevant landholder and/or land manager unless otherwise agreed				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- require offers to be made within a defined timeframe following completion of construction of the nearest visible Project infrastructure - be informed by a suitably qualified landscape architect - consider ongoing vegetation management requirements - be informed by a suitably qualified bushfire risk consultant, including consideration of Asset Protection Zones - consider opportunities for Traditional Owner input into the program-level species palette, planting design principles and cultural landscape values where relevant and agreed through Traditional Owner engagement processes - require monitoring of plant establishment, plant health, plant size and growth rate/vigour during the 24-month maintenance period - require replacement of dead or missing plants where required during the 24-month maintenance period - require annual progress reporting until the 24-month maintenance and monitoring period has ended for all participating eligible dwellings.				
LV04	Site specific visual screening for permanent above-ground infrastructure During detailed design and prior to the commencement of operation, Delivery Partner/Principal Contractor will provide perimeter landscape screening for the Tragowel Terminal Station and Bulgana Reactor Station, where practicable, to reduce visual impacts from public viewpoints and surrounding public-facing locations.	Site-specific. Triggered during detailed design and implementation of the Tragowel Terminal Station and Bulgana Reactor Station where perimeter screening is practicable and would assist in reducing public-domain visual impact.	Prepare/implement: Delivery Partner/Principal Contractor during design and construction Implement: TNSP (operational monitoring and maintenance) Review/accept: VicGrid VNI West/TNSP, as relevant	Landscape design/visual outcome records; planting/replacement records; maintenance monitoring	Design; Pre-Construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	This EPR addresses public-domain and public-facing visual impacts associated with the Tragowel Terminal Station and Bulgana Reactor Station. Landscape screening for eligible private dwellings is addressed under LV03, and landscape screening for directly affected properties is addressed through the relevant Property Management Plan under AG01. Landscape screening will be designed having regard to: • bushfire safety requirements, including Asset Protection Zones • sight distance requirements for site access • operational and maintenance requirements for the terminal station or reactor station • landscape character • the need to use appropriate species and planting layouts suited to the site context • opportunities for Traditional Owner input into planting design, species selection and cultural landscape values where relevant and agreed through Traditional Owner engagement processes. The design will identify the intended visual mitigation outcome, including whether the screening is expected to reduce the relevant public-domain visual impact rating to moderate or below, where practicable, having regard to Appendix J: Landscape and visual impact assessment. Where landscape screening is implemented, the TNSP will monitor establishment and effectiveness of the screening during the maintenance period, including plant health, plant size and growth rate/vigour. Dead or missing plants will be replaced where required during the maintenance period.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
LV05	Retention of existing visual screening vegetation During detailed design and prior to construction, the Delivery Partner/Principal Contractor will identify existing vegetation within Project-owned land, Project-controlled land, terminal station sites, laydown areas, workforce accommodation sites and other temporary construction areas that provides visual screening of Project infrastructure or construction activities from public viewpoints, community/recreation facilities or private dwellings. Where existing vegetation provides visual screening and is within the control of the Project, removal or disturbance of that vegetation will be avoided or minimised where practicable for the duration of the construction phase, unless removal or modification is required for Project safety, technical, access, bushfire, asset protection, biodiversity offset, landholder agreement, statutory approval or operational requirements. Where existing visual screening vegetation is proposed to be retained, the Project will identify practicable measures to avoid Project-related damage to that vegetation during construction, such as demarcation, fencing, exclusion zones or work method controls where required. Where removal of existing screening vegetation cannot be avoided, the Project will consider whether alternative visual management measures are required under LV01, LV02, LV03 or LV04. Retention of existing visual screening vegetation will be coordinated with relevant ecology, arboriculture, access, bushfire, landholder and constructability requirements, including EC01 and EC02 where native vegetation is involved.	Site-specific. Required during detailed design and prior to construction where existing vegetation within Project-owned land, Project-controlled land, provides visual screening of Project infrastructure or construction activities from public viewpoints, community/recreation facilities or private dwellings.	Prepare/implement: Delivery Partner/Principal Contractor during detailed design and construction Review/accept: VicGrid VNI West Specialist input: suitably qualified landscape, ecology, arboriculture or bushfire specialists where relevant	Screening vegetation assessment; design refinement/retention records; ecology/arboriculture input; alternative mitigation records where required	Design; Pre-construction; Construction.
Noise and Vibration					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
NV01	Construction Noise and Vibration Management Plan (CNVMP) During detailed design and prior to the commencement of construction, the Delivery Partner/Principal Contractor will develop and implement a Construction Noise and Vibration Management Plan (CNVMP) as a sub-plan of the CEMP to avoid and minimise, so far as reasonably practicable, noise and vibration impacts at sensitive receivers during construction and decommissioning. The CNVMP will be prepared in accordance with the Environment Protection Act 2017 and subordinate legislation and will have regard to the ongoing obligations imposed by the General Environmental Duty, the Environmental Reference Standard, EPA Victoria Publication 1834.2, EPA Victoria Publication 1254 where helicopter noise is relevant, EPA Victoria Publication 1856, EPA Publication 1996, BS 6472-1:2008, DIN 4150-3:2016-12, and relevant asset owner utility standards where applicable. The CNVMP will include, at a minimum: • identification of noise and vibration sensitive receivers, including residential, community and commercial receivers where relevant • identification of receivers with heightened sensitivity at particular times such as shift workers, community events, or other property-specific periods identified through consultation. • construction noise and vibration reference levels and criteria, including requirements under EPA Victoria Publication 1834.2, the environmental values in the Environmental Reference Standard, vibration criteria for human comfort, structures, buried assets and utilities, and relevant asset owner requirements.	Project-wide, with site-specific application. Required during detailed design and prior to construction and applies where construction or decommissioning activities may generate noise or vibration impacts.	Prepare: Delivery Partner/Principal Contractor during detailed design and pre-construction Specialist input: suitably qualified acoustic engineer Implement: Delivery Partner/Principal Contractor (construction); Principal Contractor for decommissioning Review/accept: VicGrid VNI West Independent review/verification: IEA under EM02 where required	CNVMP; modelling and monitoring/ inspection records; complaints/ incidents; special-character noise assessments where relevant	Construction; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• details of relevant construction activities and indicative scheduling, including activities with potential to generate noise and vibration impacts at sensitive receivers. • noise and vibration modelling undertaken by a suitably qualified acoustic engineer, as to inform the CNVMP. The model will be reviewed and updated where there is a material change in construction methodology, equipment, staging, work location or received context, and at least every six months during construction where relevant to confirm that predicted impacts, mitigation and management measures remain appropriate. • assessment of potential low-frequency, tonal, impulsive or intermittent noise where relevant to the construction activity, equipment or receiver context, including identification of appropriate management controls to reduce these so far as reasonably practicable, where these characteristics are predicted or identified. • assessment and management of construction traffic noise where relevant, including interface with traffic management measures under TT01. • procedures for managing helicopter noise where helicopter stringing or other helicopter activities are proposed, having regard to EPA Victoria Publication 1254 where relevant. • a noise and vibration risk assessment for laydown areas • assessment of cumulative project construction noise and vibration where relevant				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- procedures for identifying where occupancies, structures, buried assets or utilities are within the relevant minimum working distances derived from the applicable vibration standards, and the additional management measures required in those circumstances - requirements for specific consultation with identified noise sensitive receivers in higher impact areas, as informed by modelling and the Communication and Stakeholder Engagement Plan under EM08 - assessment and implementation of reasonably practicable construction noise and vibration management measures, including relevant measures from EPA Victoria Publication 1834.2, including scheduling management measures, community notification and engagement measures and good practice techniques. - documentation of the selected management measures (such as noise screening, attenuators, enclosures or quieter plant selection) and their associated reduction factors, with the rationale for their selection. - roles and responsibilities for noise and vibration management, monitoring, review and corrective action - community notification procedures consistent with Section 4.3.2 of EPA Victoria Publication 1834.2, the Communications and Stakeholder Engagement Plan EM08, and the Complaints Management System under EM09 - a monitoring and inspection program to validate predictions, assess effectiveness of controls, assess whether impacts are being minimised so far as reasonably practicable, and verify predictions for Managed-Impact Works and Unavoidable Work				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- contingency and corrective action procedures where nominated reference levels or criteria are exceeded, or where monitoring, inspection, complaints or incidents indicate that controls are not effective - procedures for reviewing and updating the modelling, plan and controls in response to Project changes, changing conditions, monitoring results or complaints. - procedure for permitting works outside normal working hours. - Consideration of periods where works should be avoided or minimised where practicable, such as harvesting, lambing and calving, as required by EPR AG01.				
NV02	Minimise works outside normal working hours Construction works will be scheduled during normal working hours, being 7am to 6pm Monday to Friday (excluding public holidays) and 7am to 1pm Saturdays. Works outside normal working hours may only occur where all of the following conditions are met: - clear justification is provided explaining why the works cannot be constrained to normal working hours; and - works are identified as low-noise impact works, Managed-Impact Works, or Unavoidable Works, as defined in EPA Victoria Publication 1834.2; and - the works are undertaken in accordance with the CNVMP and noise and vibration levels are predicted to comply with the relevant criteria. Where works outside normal working hours are proposed, potentially affected landholders will be notified in advance and the works will be made available on the Project website where required by the CNVMP.	Project-wide. Triggered where construction works are proposed outside normal working hours.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West under the Project assurance framework	ONWH approval/ justification records; notifications; monitoring; complaints/ incidents	Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Noise and vibration monitoring will be undertaken at the commencement of Managed-Impact Works and Unavoidable Works to confirm predicted levels and triggering the corrective action procedures under the CNVMP where controls are not effective. This EPR does not apply to emergency works required to avoid loss of life, damage to property or environmental harm, but the CNVMP will include a process for responding to such works and informing EPA Victoria and relevant regulators as required.				
NV03	Operational Noise Management Plan (ONMP) Prior to the commencement of operation, the TNSP will develop and implement an Operational Noise Management Plan (ONMP) to avoid and minimise operational noise impacts so far as reasonably practicable. The ONMP will be prepared in accordance with the <i>Environment Protection Act 2017</i>, the General Environmental Duty, the Environment Protection Regulations 2021, and relevant guidance including EPA Victoria Publication 1826, EPA Victoria Publication 1997, and, where relevant, EPA Victoria Publication 1996. The ONMP will apply to operational noise sources associated with the Tragowel Terminal Station, Bulgana Reactor Station and any other Project infrastructure subject to the applicable industrial or commercial noise framework, and will include, at a minimum: - operational noise reference levels and criteria - noise predictions and assessment for relevant operational noise sources - assessment of all reasonably practicable controls and documentation of why particular controls are or are not adopted	Project-wide, with site-specific application to operational noise sources, including the Tragowel Terminal Station and Bulgana Reactor Station. Triggered prior to operation.	Prepare: TNSP during detailed design and pre-construction Specialist input: suitably qualified acoustic engineer Implement: TNSP during operation Accept: TNSP governance arrangements; VicGrid VNI West pre-handover, as relevant	ONMP; operational noise assessments; complaints/incidents	Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- assessment of cumulative operational noise where other existing or reasonably foreseeable industrial or energy infrastructure may contribute to effective noise levels at relevant receivers. - quieter equipment selection where reasonably practicable - engineering controls such as barriers, attenuators or other source controls where required - review of operational noise modelling during detailed design where equipment selection, layout, source levels, barriers or other noise controls materially change - measures to minimise low-frequency, sporadic, tonal, impulsive and intermittent noise, so far as reasonably practicable - measures to minimise corona noise so far as reasonably practicable - measures to minimise wind-generated noise and vibration, such as aeolian noise, including engineering controls where required - arrangements to minimise noise from maintenance activities, including restricting maintenance to daytime hours where reasonably practicable and implementing communication and mitigation measures where out-of-hours maintenance is necessary - a commissioning monitoring and inspection assessment to validate predictions, and assess effectiveness of controls, including corona noise from transmission line infrastructure on receptors within 300m - operational complaints, review and corrective action procedures.				
Social					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SC01	Social Value Strategy Prior to the commencement of construction, VicGrid VNI West will develop a Social Value Strategy to maximise the potential positive impacts of the Project. The Social Value Strategy will be informed by engagement with community stakeholders, and will identify key opportunities, priority outcomes and practical actions the Project could support to respond to local priorities and opportunities. This will include exploration of opportunities to relocate and transfer construction workforce accommodation assets for community use as part of the accommodation decommissioning process. The Social Value Strategy will be prepared as a standalone document and published on the Project website. The Social Value Strategy will include, at a minimum: • principles for delivering social value outcomes associated with the Project • the process for identifying and assessing social value opportunities • identification of key opportunity areas, priority outcomes and practical actions that could be implemented to support local and regional social, economic, and environmental outcomes, where relevant, including indicative implementation pathways and responsibilities • governance arrangements for implementation, monitoring, evaluation and reporting • roles and responsibilities to support implementation • processes for reviewing and updating the Social Value Strategy over time.	Project-wide, with local and regional application in communities affected by the Project. Triggered prior to construction and implemented through construction and operation where relevant.	Prepare/implement: VicGrid VNI West Support: Delivery Partner/Principal Contractor; TNSP where relevant Consult: relevant community stakeholders	Social Value Strategy; engagement/ initiative records; annual independent evaluation; review/update records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Social Value Strategy will be implemented in parallel with the social impact management measures required under this EMF. It will not replace the requirement to implement other EPRs that avoid, minimise or manage specific Project impacts.				
SC02	Support community mental health The Project will continue to support mental health and wellbeing services in LGAs surrounding the Proposed Easement during the pre-construction and construction phases. This will include: • continuation of the partnership with an established local trusted, independent community support agency to provide financial and wellbeing counselling services. • a pilot program to support delivery of clinical services developed in consultation with local councils. Prior to completion of construction, mental health and wellbeing initiatives will be reviewed to determine their suitability for continued support during operation. The Project will support mental health and wellbeing services for a minimum of five years after completion of construction. The need for further support beyond this period will be independently evaluated. All initiatives will include targeted support for vulnerable groups identified in the Social Impact Assessment (SIA) undertaken in EES Technical Appendix Q: Social and will include measurable outcomes which will be reflected in the Social Impact Management Plan (SIMP) required by EPR-SC07.	Project-wide. Triggered prior to construction and applies during construction and operation.	Prepare/implement: VicGrid VNI West Review/accept: VicGrid VNI West	Service delivery records; program review; feedback/outcome records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SC03	Workforce Accommodation and Behaviour Management Plan Prior to the commencement of construction, VicGrid VNI West will develop and implement a Workforce Accommodation and Behaviour Management Plan for the Project's workforce accommodation sites to avoid and minimise negative social impacts of the construction workforce on surrounding communities. - The Workforce Accommodation and Behaviour Management Plan will be developed having regard to the Social Value Strategy required by EPR-SC01, where relevant, and will outline: - requirements for workforce accommodation occupancy and management arrangements, having regard to workforce planning, local housing availability and affordability - protocols for worker access to settlements in proximity to workforce accommodation sites - requirements for the provision of medical services and on-call medical support for workers where appropriate - requirements for the provision of on-site amenities and welfare facilities, where appropriate, to reduce reliance on services in nearby towns - a Code of Conduct for the Project workforce, developed in consultation with local councils, covering expected standards of behaviour when interacting with local communities and using local road networks - processes for investigating and responding to non-compliance with the Code of Conduct - a process for considering alternative arrangements where agreed with the relevant councils, where this would increase positive socioeconomic outcomes while avoiding and minimising negative social impacts. A summary of behavioural standards for the Project workforce will be made publicly available.	Site-specific. Triggered prior to construction for the Project's workforce accommodation sites. Applies during design, establishment and use of those sites during construction.	Prepare/implement: VicGrid VNI West; Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West, in consultation with relevant councils where required	Workforce accommodation management; occupancy/access; Code of Conduct; incident/non-compliance; council consultation records	Design; Pre-construction; Construction;

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SC04	Social information sharing and issue-specific communication The Project will provide timely, accessible and plain-English information on safety matters of concern to stakeholders, including bushfire and fire-fighting beneath transmission lines, electric and magnetic fields and physical health risks, and the potential impact of electric and magnetic fields on the performance of GPS farming technology. The Project will make technical study authors available for community events or other forums during the pre-construction and construction phases, where appropriate, to explain findings and respond to queries. The Project will provide ongoing environmental awareness training to Project staff and contractors in accordance with the Project CEMP required by EPR-EM03, the OEMP required by EPR-EM04, and the DEMP required by EPR-EM05. Social information sharing and engagement, including the recording and consideration of feedback received through issue-specific communication, will be undertaken in accordance with the CSEP required by EPR-EM08.	Project-wide. Triggered prior to construction and applies through construction and operation as new information becomes available or issues are raised.	Prepare/implement: VicGrid VNI West; Delivery Partner/Principal Contractor; TNSP Review/accept: VicGrid VNI West	Information materials; event/attendance and training records	Pre-construction; Construction; Operation
SC05	Local Workforce Development Strategy Prior to the commencement of construction, VicGrid VNI West will develop and implement a Local Workforce Development Strategy, in consultation with relevant councils, Traditional Owner groups and stakeholders, to identify Project labour needs and maximise opportunities for local workers in impacted LGAs to participate in the Project. The Local Workforce Development Strategy will be developed having regard to the Social Value Strategy required by EPR-SC01 and informed by engagement undertaken in accordance with the Communications and Stakeholder Engagement Plan required by EPR-EM08.	Project-wide Triggered prior to construction and applies during construction. Operational workforce measures to be identified prior to operation, where relevant.	Prepare/implement: VicGrid VNI West; Delivery Partner/Principal Contractor; TNSP Review/accept: VicGrid VNI West, in consultation with relevant councils, Traditional Owner groups and stakeholders where required	Local Workforce Development Strategy; consultation; local job/training initiative records; workforce participation records	Pre-construction; Construction; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	The Local Workforce Development Strategy will include, as relevant: • initiatives to support training, apprenticeship and employment opportunities for local job seekers, linked to both the construction and operation phases of the Project • measures to balance Project workforce requirements with local labour market conditions, including consideration of the timing of key agricultural activities such as harvest periods, to avoid or minimise adverse impacts on local businesses and services from the Project's demand for skilled workers • measures to promote employment opportunities through multiple local channels • measures to support local workforce growth, including by hiring regional Victorian workers where practicable, particularly workers under 25 years of age • skills training and education initiatives to upskill local workers and support their participation in the Project, having regard to relevant local procurement and business participation measures required by EPR-BE02 • measures to support local workforce transition following construction, including working with local organisations to identify opportunities in other sectors or projects. Measures may include: - internal redeployment; - further training or reskilling; and - partnering with local employment agencies to identify new employment opportunities for workers transitioning out of the Project. The Local Workforce Development Strategy will also document how the inclusive employment initiatives required by EPR-EM15 will be implemented.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SC06	Support local Council resourcing The Project will continue to engage with councils in the social locality and, where mutually agreeable, provide funding to assist with resourcing for matters that are a direct result of the Project. This support may form part of a regional energy collaboration in recognition of the cumulative impact the Project and other renewable energy projects may have on council resourcing.	Project-wide. Triggered prior to construction and applies during construction.	Prepare/implement: VicGrid VNI West Agree: relevant councils	Council engagement; funding/support agreements; review records	Pre-construction; Construction
SC07	Develop and implement a Social Impact Management Plan The Project will develop a SIMP prior to construction, in consultation with stakeholders, implement it on an ongoing basis throughout the Project. The SIMP will, at a minimum: • compare actual impacts of the Project with those originally forecast in the Social Impact Assessment (SIA) undertaken in <i>EES Technical Appendix Q: Social</i>. • detail engagement undertaken to inform the SIMP and provide channels for ongoing engagement. • include a robust measurement process that details defined actions and measurable outcomes for monitoring, public reporting, and review. • monitor implementation and progress of management measures, social commitments and controls identified in the SIA, with a priority focus on highly rated impacts identified in the SIA. • specify individuals or organisations responsible for implementing measures and achieving outcomes • outline how findings of social impact measurement will be reported publicly and shared with affected parties, including landholders, Traditional Owners, businesses, community organisations and government bodies.	Project-wide. Triggered prior to construction and applies across all Project phases.	Prepare/implement: VicGrid VNI West Review/accept: VicGrid VNI West under the Project assurance framework	SIMP; social monitoring/reporting; published measurement reports; independent review/update records	Pre-construction; Construction; Operation; Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- outline the timing and frequency of monitoring and reporting arrangements. - align with adaptive management principles by responding to feedback and further impacts identified throughout the Project's development, and outline processes for updating and refining impact monitoring and management strategies as required. The SIMP will be independently reviewed at least every three years and adapted according to review outcomes.				
Surface water					
SW01	Surface Water Management Plan (SWMP) Prior to construction, the Delivery Partner/Principal Contractor will develop and implement a SWMP as a sub-plan under the CEMP. The Surface Water Management Plan will be developed by a suitably qualified person with expertise in hydrology, surface water management, erosion and sediment control or water quality management, and in consultation with the relevant Catchment Management Authorities. The Surface Water Management Plan will describe the surface water management measures required for the Project to avoid and minimise impacts on surface water values, water quality, hydrology, drainage, flood risk and waterway condition. The Surface Water Management Plan will consider all of the environmental values of surface water as defined in the Environment Reference Standard (ERS). The Surface Water Management Plan will provide for: Water quality is maintained in accordance with the indicators and objectives of the Environment Reference Standard	Project-wide, with site-specific application. Where works are within 50 metres of a waterway or may affect surface water values. Triggered prior to construction and applies during construction and decommissioning.	Prepare/implement: Delivery Partner/Principal Contractor during construction; Principal Contractor for decommissioning during decommissioning Review/accept: VicGrid VNI West Specialist input: suitably qualified hydrology/surface water/erosion and sediment control specialist	SWMP; CMA consultation; inspections/water quality monitoring; reinstatement/erosion monitoring; permit records	Pre-construction; Construction Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- Construction activities are carried out in accordance with industry standard best practice guidelines including: - IECA Best Practice Erosion and Sediment Control Guidelines - EPA Victoria Publication 1834.2: Civil construction, building and demolition guide - EPA Victoria Publication 1896: Working within or adjacent to waterways - EPA Victoria Publication 1894: Managing soil disturbance - EPA - Victoria Publication 1893: Erosion, sediment and dust: treatment train The SWMP will include, at a minimum: - an outline of the surface water management measures that are necessary to reduce the impacts of construction works on the existing environmental values of surface water - measures that aim to manage existing flood risk and protect the safety of site personnel during flood events - a baseline water quality assessment prior to construction to understand existing watercourse condition where watercourses could receive stormwater from areas of disturbance, including opportunistic sampling during or immediately after rainfall for ephemeral creeks where practicable - a surface water quality monitoring program to measure the effectiveness of the erosion and sediment controls				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• details of monitoring locations, timing and frequency for upstream and downstream monitoring prior to construction, during construction and post-construction, where required, to understand any changes to water quality that could affect surface water environmental values • details of the process to obtain a “Works on Waterways” permit for all waterway crossings, waterway diversions, vegetation removal in proximity to waterways and works on the floodplain • links to the Acid Sulfate Soil Management Plan (ASSMP) (GS04), where relevant • a process for reviewing control effectiveness and implementing additional or improved controls where monitoring, inspection, incident, complaint or audit findings indicate that controls have failed or are not effective to eliminate or minimise risks of harm to surface waters • a decision hierarchy for the testing and disposal or reuse of rainwater that has collected in open excavations • diversion of clean surface water around active work areas, disturbed and unvegetated ground. • timely rehabilitation of earthworks, including vegetation, hydromulch or other stabilisation methods where appropriate • scheduling and adaptation of works to avoid periods of wet weather and inundation where practicable • sediment control devices such as bunding or silt fences around active work areas, stockpiled material, earthworks and disturbed ground. • controls to manage sediment, dust, dirt and debris from truck and construction vehicle movements, with cross-reference to relevant traffic and air quality controls under TT01 and AQ01 where applicable				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• sediment control devices such as bunding or silt fences around active work areas, stockpiled material, earthworks and disturbed ground • soil stabilisation works where soil type (e.g. Class B, C and D soils) and slope grade present a risk of erosion. • sediment basins at key construction sites and access track locations. • minimum 50 metre setbacks of construction works from waterways and identified drainage lines, where possible. • procedures for vegetation removal and reinstatement for works in and adjacent to waterways, with cross-reference to relevant ecology EPRs including EC01 and EC02 where applicable • a process for removing displaced fluids to a licenced facility where required • strategies to maintain existing hydrological conditions and flow regime during construction • waterway crossings only with the appropriate Works on Waterways permit • requirements for any reuse of captured stormwater, such as for dust suppression or washdown, to be managed so that it does not cause environmental harm, spread contamination or affect agricultural water systems • requirements that extraction of surface water from waterways for construction non-potable uses will not occur unless authorised by the relevant authority where applicable.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SW02	Avoidance of construction flood risk through design Detailed design will avoid the placement of construction areas, laydown areas and material storage in flood-prone areas, including areas identified as a land subject to inundation overlay in the local planning scheme, where practicable. Where relocation is not feasible the following measures will be adopted: • flood modelling to determine existing flood characteristics, where potential risks are identified. • design and management measures to ensure construction activities do not result in a material increase in flood level, flood extent or flood hazard outside the Project area • elevating temporary buildings and containerised equipment above the 1% AEP flood level wherever practical. • access tracks designed to maintain the existing hydrology, by not increasing ground levels where practicable and considering floodplain storage and conveyance • post-construction verification where works occur in flood-prone areas, to confirm that implemented works are consistent with the flood risk assessment and do not materially increase flood level, extent or hazard outside the Project area. These flood risk management measures, including outcomes of any flood modelling assessments and post-construction verification requirements, will be incorporated into detailed design and the SWMP.	Site-specific: Land subject to inundation or other flood-prone areas affecting construction areas, laydowns, material storage or access tracks. Required during detailed design, construction and post-construction verification where relevant.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West	Flood modelling; Development Plan; SWMP updates; post-construction verification where required	Design; Construction; Post-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
SW03	Stormwater Quality Terminal station bench and access tracks will be designed to ensure stormwater runoff during operation is treated prior to discharging into receiving waters or adjacent land. Stormwater design will have regard to: • CSIRO Best Practice Environmental Guidelines (BPEMG) for stormwater management (1999) • EPA Victoria Publication 1739: Urban stormwater management guidance, • Infrastructure Design Manual (IDM), prepared and maintained by the Local Government Infrastructure Design Association (LGIDA) • the Environment Reference Standard, including the environmental values of surface water and relevant indicators and objectives. Designed controls will include, at a minimum, water quality improvement devices to capture hydrocarbons and reduce the risk of contaminated runoff leaving the site (e.g. oil-water separator), where relevant. The design will consider the ability of stormwater drainage assets to accommodate the impacts of climate change over the operational life of the Project (e.g. as determined by current ARR guidelines).	Site-specific: Applies to Tragowel Terminal Station and relevant permanent access tracks. Required during detailed design and operation where stormwater runoff may discharge to receiving waters, adjacent land or agricultural drainage systems.	Prepare: VicGrid VNI West; Delivery Partner/Principal Contractor during detailed design Implement: Delivery Partner/Principal Contractor (design delivery); TNSP (operation) Review/accept: VicGrid VNI West/TNSP, as relevant	Stormwater design documentation; operational inspection records where relevant	Design; Operation
SW04	Avoidance of operational flood risk through design Permanent Project infrastructure, including tower access roads, will be sited, where feasible, outside the 1% AEP flood extent (including allowances for climate change, in line with current ARR guidelines) or areas prone to flooding. This includes areas designated as FO and LSIO in the local planning scheme, as well as other flood prone areas that are not formally mapped.	Site-specific: Flood prone areas/FO/LSIO land/areas within 50 metres of designated waterways affecting permanent or operational infrastructure.	Prepare/implement: Delivery Partner/Principal Contractor Accept: VicGrid VNI West	Flood modelling; Development Plan; consultation records	Design; Operation

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	Operational and permanent infrastructure will adopt minimum 50 metre setbacks from designated waterways in accordance with requirements from the local CMA. Where this is not considered feasible, the following mitigation measures will be applied: • Tragowel Terminal Station, including access tracks will be designed to maintain the existing hydrology, where practicable • Tragowel Terminal Station design will be designed to minimise changes in flood risk offsite • flood modelling will be carried out during detailed design of the Tragowel Terminal Station to test and demonstrate the effectiveness of the selected flood risk mitigation measures. • the local CMA and water authority will be consulted prior to commencing the decommissioning of any on-farm irrigation channels. Decommissioning of on-farm irrigation channels will also aim to maintain at least one existing levee, to maintain existing flood characteristics. • sensitive assets, or infrastructure that has the potential to cause pollution will be protected from the impacts of flooding for all storm events up to the 1% AEP flood. • Where infrastructure cannot achieve a minimum 50 metre setback from designated waterways, further assessment will be carried out to understand the potential site-specific impacts and identify additional controls or design responses.				
Traffic and transport					

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
TT01	Traffic Management Plans (TMPs) Prior to construction, the Principal Contractor will develop and implement Traffic Management Plans (TMPs) to manage traffic relating to the Project. TMPs may be prepared in stages according to the locations of Project works and the roads used by construction traffic, and will be implemented during construction and modified, where required, for the operation and decommissioning phases of the Project. Each TMP will be: - developed in consultation with the responsible road authorities - consistent with Clause 3 of Schedule 7 to the <i>Road Management Act 2004</i> and developed in accordance with the Code of Practice for Worksite Safety – Traffic Management, Australian Standard AS 1742.3: Manual of uniform traffic control devices, Part 3: Traffic control for works on road. Each TMP will include, at a minimum: - required approval conditions relating to traffic and transport management - relevant policy, regulatory and protocol requirements specific to construction traffic management - verification of existing conditions at the time of development - approved Project scope, including finalised details on construction extents, staging, vehicle types, origins and destinations for construction materials and spoil, and peaks of construction activity - details of traffic volumes and movements of other major projects in the local area, where available, and procedures for coordination where overlapping construction traffic is identified	Project-wide. Required prior to construction. Site-specific TMPs will be developed where required for particular work areas, haulage routes, access points, road upgrades, intersections or locations requiring traffic management treatments.	Prepare/implement: Delivery Partner/Principal Contractor during construction; TNSP during operation where updates are required; Principal Contractor for decommissioning during decommissioning Review/accept: VicGrid VNI West; relevant road authority, including relevant councils and the Department of Transport and Planning/Head, Transport for Victoria where applicable	TMPs; six-monthly IEA review; traffic monitoring and consultation records	Pre-construction; Construction; Operation (if required); Decommissioning

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- confirmed routes for construction haulage and construction vehicles, including heavy vehicle and oversize overmass vehicles, and the number and types of vehicles expected to use those routes - confirmation of access point locations and whether new or altered access arrangements are required to state-managed roads, rail networks or other transport land - maps of routes proposed to be used for construction vehicles having due regard to all road users including cyclists and pedestrians - pre-construction on-site checks to assess route options for safety and clearance to poles, wires, structures, street lighting, signage and trees for oversize overmass vehicles - monitoring of Project traffic volumes generated during construction against predicted traffic volumes - traffic management or scheduling measures required to support construction traffic noise management where identified through NV01, including changes to haulage routes, timing, vehicle movements or other traffic management measures where practicable - signage requirements in accordance with Australian Standard AS 1742 including consideration of temporary speed limits, truck movements to/from the proposed site access points and key road connections including access restrictions - a driver code of conduct for heavy vehicle drivers - inductions and toolbox talks to inform workers of safety expectations - engagement processes with public and private bus operators, particularly operators of school buses, and review of public and school bus services potentially affected				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• coordination of construction vehicle scheduling and routes with rail operators • protocols to provide the community and other stakeholders with adequate notice of anticipated changes to transport conditions in accordance with the Communication and Stakeholder Engagement Plans under EPR-EM08 • processes for management of temporary road and traffic lane closures • requirements to limit or avoid heavy vehicle movements during AM and PM peak periods, and where practicable to avoid construction trips nearby typical school drop-off and pick-up periods • measures to ensure emergency service access is not inhibited by Project activities • measures to minimise dirt and debris, dust and sediment tracking or runoff associated with Project traffic • measures to minimise noise and vibration impacts to sensitive receptors • procedures for notifying the responsible road authority of incidents affecting road safety, traffic operations or road assets where required under applicable legislation or conditions of any consent or authorisation • the outcomes of TT02, TT03 and TT04.				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
TT02	Access, heavy vehicle haulage and road safety assessment Prior to construction, the Principal Contractor will undertake an integrated assessment of proposed easement access points, access roads to/from laydown and workforce accommodation sites, and heavy vehicle designated areas, B-double and oversize overmass haulage routes, once construction methodology and access locations have been confirmed. This assessment will include: • independent Road Safety Audits at easement access points, access roads to/from laydown areas and workforce accommodation sites • assessment of heavy vehicle and oversize overmass routes between origins and laydown areas for loads, bulk materials and spoil, including larger components travelling from the Port of Melbourne to the Tragowel Terminal Station and Bulgana Reactor Station • vehicle turning and clearance checks where relevant, including investigation of potential obstructions such as wires, bridges, culverts, poles, signage and trees • consideration of emergency vehicle access and whether road surface upgrades are required • consultation with the responsible road authorities and other relevant stakeholders • consultation with landholders in conjunction with Property Management Plans under AG01 • assessment of farm machinery movement, paddock access, livestock transport routes and internal farm connectivity in consultation with landholders where required • identification of measures to maintain or provide alternative property access and farm connectivity where existing access is temporarily restricted or affected by Project works	Site-specific. Required prior to construction for easement access points, access roads to laydown areas and workforce accommodation, and roads proposed to be used by heavy vehicle, B-double or oversize overmass construction traffic.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West; relevant road authority where applicable	Road Safety Audit/haulage assessment; swept path/clearance checks; landholder/farm access assessments; TMP updates	Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- identification of alternate routes where access may be restricted or constrained - identification of route constraints, safety deficiencies, required access treatments and any further mitigation measures or controls. Any new or altered access or road works identified through the assessment will be subject to applicable consent requirements under the Road Management Act 2004. Where native vegetation removal may be required to implement access or haulage arrangements it will be assessed under EPR-EC01 and minimised in accordance with the <i>Guidelines for the removal, destruction or lopping of native vegetation</i> (DELWP 2017) and the <i>Assessor's handbook – applications to remove, destroy or lop native vegetation</i> (DEECA 2025). Outcomes of the assessment will be incorporated into the TMP.				
TT03	Road design and intersection treatments Prior to construction, the Principal Contractor will reassess the final road network, access points and expected Project traffic generation to determine whether road, intersection or sight distance improvement treatments are required to maintain safe and efficient traffic operation. The assessment will: - identify where turning lane upgrades, access point upgrades, intersection treatments, sight distance treatments, temporary speed management, signage or warning treatments are required - confirm vehicle swept paths for final access points and relevant road network intersections - incorporate the requirement to address safety deficiencies identified through TT02	Site-specific. Triggered where access points, road sections, intersections or route segments used by Project traffic require upgrades, treatments or sight distance improvements.	Prepare/implement: Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West; relevant road authority where applicable	Design/treatment drawings; consultation; TMP updates; implementation records	Pre-construction; Construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	consider existing local traffic access and movements and other local amenities or facilities, including parks and reserves, in the vicinity of proposed access points and limiting access during school periods identify where alternative routes may be required and the corresponding treatment implications. Treatments will be designed by a suitably qualified civil or traffic engineer and implemented in consultation with the relevant landholders and following receipt of any written consent required under Clause 16 of Schedule 7 to the Road Management Act 2004 and any other statutory authorisation required for the treatment. Native vegetation removal will be avoided at the locations identified in <i>Appendix G of EES Technical Appendix K: Traffic and transport</i>. The measures identified in <i>Appendix G Sight Distance Analysis of EES Technical Appendix K: Traffic and transport</i> will be implemented and the outcomes of Appendix G will be updated if alternative routes are required. Outcomes of the assessment and required treatments will be included in the TMP.				
TT04	Road condition, dilapidation and reinstatement Prior to construction, the Principal Contractor will undertake detailed road pavement condition and dilapidation assessments for roads, bridges and culverts expected to be used by Project construction traffic, in accordance with this EPR. The assessment will be carried out by suitably qualified engineers. The assessment and management process will include:	Site-specific. Triggered for roads, bridges and culverts used by Project construction traffic, including roads servicing access points, laydown areas, workforce accommodation, stringing areas, transmission tower work areas and terminal stations.	Prepare/implement Delivery Partner/Principal Contractor Review/accept: VicGrid VNI West Agree: relevant local council/road authority, as applicable	Dilapidation surveys; road monitoring/ inspection; maintenance/ rectification; restoration/ hand-back records	Pre-construction; Construction; Post-construction

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	- consultation with the responsible road authority and, where relevant, other relevant road asset owners to agree on the scope of pre-condition survey extents and survey requirements, including whether specialist pavement condition surveys or photographic surveys are required - documentation of the condition of pavements and other road infrastructure such as bridges and culverts for roads expected to be used by construction traffic - identification of mass limits for bridges and culverts along proposed routes in consultation with relevant road authority and, where relevant, any other relevant asset owners - identification of any upgrades or treatments to roads or road infrastructure required to safely accommodate Project traffic, and, where such upgrades or treatments are required, design and implementation of those works in accordance with applicable road authority standards and specifications, including the Infrastructure Design Manual where applicable, and having regard to the road classification and the volumes, frequencies, duration and types of vehicles expected to use the relevant roads or road infrastructure for the purposes of the Project. - road condition monitoring, reporting and timely rectification throughout construction, having regard to the pre-construction condition assessment and any applicable conditions of statutory consent, to address Project-related deterioration affecting road safety or serviceability - a schedule for routine monitoring and inspections of pavement condition to identify defects during construction - contingency treatments and implementation timeframes				

EPR ID	Environmental Performance Requirement	Application and timing	Responsibility	Monitoring and verification	Phase
	• post-construction dilapidation survey to determine restoration requirements • asset hand-back agreements • remediation requirements. These activities will be undertaken at the following frequency: • pre-construction dilapidation survey and identification of any required upgrades or rectification prior to use by Project traffic • road condition monitoring, reporting and rectification throughout construction • post-construction dilapidation survey to determine restoration requirements. Where a pavement failure has occurred, or any road, bridge or culvert has been damaged or degraded as a result of Project construction traffic, the Principal Contractor will reinstate the asset to its pre-construction condition in accordance with Clause 12 of Schedule 7 to the <i>Road Management Act 2004</i> and in consultation with the relevant road authority. Road condition monitoring outcomes during construction will be provided to the responsible road authority and other relevant road asset owners, and the outcomes of the assessment will be incorporated into the relevant TMPs.				

28.12 Monitoring and contingency measures

As discussed in Section 28.9.1, monitoring is a key mechanism for verifying compliance with statutory approvals, tracking implementation of the EPRs and assessing whether management plans and controls are effective. Table 28-7 identifies the proposed monitoring measures and reporting mechanisms expected to support implementation of the EPRs.

The monitoring measures presented in this section provide line of sight between the EPRs and the monitoring and reporting processes that will support their implementation. They are not intended to prescribe the final detailed monitoring program for each discipline. Detailed monitoring requirements will be developed through the relevant management plans, sub-plans, procedures, Property Management Plans, Cultural Heritage Management Plans, permits, consents or approval instruments, as applicable.

Where monitoring is required by an EPR, management plan or approval condition, the relevant implementation document must define the monitoring details required for that issue, including where relevant:

- Monitoring objectives
- Locations, receptors or assets to be monitored
- Monitoring methods
- Frequency, duration and timing
- Performance criteria, management thresholds or trigger points
- Roles and responsibilities
- Reporting requirements
- Contingency, corrective action or adaptive management responses

Where monitoring identifies that performance criteria are not being met, controls are not effective, or that an impact is greater than predicted, the relevant management plan will set out the response process. This may include investigation of the cause, notification or reporting where required, implementation of corrective actions, additional controls, increased monitoring, review of work methods, or escalation in accordance with the EMF and relevant approval requirements. Where emergency or incident response arrangements are required, these will be addressed through the relevant emergency preparedness, incident management or response procedures.

Table 28-7 Proposed monitoring and contingency

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
General						
EM03	Monitor performance against the CEMP and construction sub-plans required by the EPRs	Project-wide construction work areas	Routine, as specified in the CEMP	Construction	Principal Contractor	To monitor compliance with the requirements and controls included in the CEMP and construction sub-plans
EM04	Monitor performance against the OEMP and operational sub-plans required by the EPRs	Project-wide operational infrastructure and activities	Routine, as specified in the OEMP	Operation	TNSP	To monitor compliance with the requirements and controls included in the OEMP and operational sub-plans
EM05	Monitor performance against the DEMP and decommissioning sub-plans required by the EPRs	Project-wide decommissioning work areas	Routine, as specified in the DEMP	Decommissioning	Principal Contractor for decommissioning	To monitor compliance with the requirements and controls included in the DEMP and decommissioning sub-plans
EM02	Review and audit implementation of the EMF, CEMP, OEMP, DEMP and other plans required by the EPRs	Project-wide	At intervals specified in the Project assurance framework	Construction; Operation; Decommissioning	Independent Environmental Auditor/VicGrid VNI West	To provide independent review of Project performance against the EPRs and other environmental requirements

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EM08	Monitor the effectiveness and responsiveness of communications and stakeholder engagement activities required by the CSEP	Project-wide/affected stakeholder groups	Regular, as specified in the CSEP	Construction; Operation where relevant	VicGrid VNI West	To provide a measure of the effectiveness of communication and engagement activities and verify that issues are appropriately identified and responded to
EM09	Monitor complaints received through the complaints management system, including trends, response times and close-out	Project-wide	Ongoing/as complaints are received Monthly review of complaints reported in contractor monthly reports.	Construction; Operation where relevant; Decommissioning where relevant	VicGrid VNI West; Principal Contractor/TNSP to comply as relevant	To verify complaints are appropriately captured, investigated and resolved, and to identify where adaptive management is required
EM10	Monitor publication and currency of key project information required to be publicly available	Project website/published information	Ongoing/periodic review	Construction; Operation	VicGrid VNI West	To verify required public information remains available and up to date
EM11	Monitor implementation of the Ongoing Traditional Owner Engagement and Communications Plan	Relevant Traditional Owner group Country/interfaces	Ongoing, as specified in the plan	Construction	VicGrid VNI West	To verify agreed Traditional Owner communication and engagement mechanisms are implemented and updated over time
Aboriginal cultural heritage						

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
ACH04	Monitoring compliance with CHMPs and review where required	Areas subject to approved CHMP requirements	Ongoing, as specified in the CHMPs	Construction Decommissioning	Principal Contractor, VicGrid VNI West/TNSP where relevant	To ensure all works are undertaken in accordance with approved CHMPs and with approved activity areas, review and amend CHMP as required
ACH04; ACH05	Unexpected Finds Protocol	Areas subject to approved CHMP requirements	Event-triggered and as specified in the CHMP	Construction Decommissioning	Principal Contractor	To stop works if suspected cultural heritage is identified and implement CHMP contingency measures including notifying relevant parties
ACH05	Ancestral Remains Protocol	Areas subject to approved CHMP requirements	Event-triggered and as specified in the CHMP	Construction Decommissioning	Principal Contractor	To immediately cease works in vicinity of remains, protect remains in-situ and prevent disturbance, implement CHMP and legislative requirements

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
ACH01; ACH02; ACH03	Documentation of implementation of Traditional Owner Engagement Plan and Cultural Values Assessments	Relevant Traditional Owner group/Country interfaces	Ongoing, as specified in the plan	Construction	Principal Contractor, VicGrid VNI West/TNSP where relevant	Documentation describing implementation of Traditional Owner Engagement Plan, documentation indicating how results of Cultural Values Assessments have been considered in Project design, decision-making and delivery
Agriculture						
AG02	Monitor biosecurity performance, including presence of weeds, pests, fungi and diseases, and compliance with the Biosecurity Management Plan record-keeping requirements	Project wide (active work areas)	Monthly during relevant phases via site inspections and review of monthly contractor reports	Construction; Operation; Decommissioning	Landholders (informal observation); Principal Contractor; VicGrid VNI West/TNSP	To identify biosecurity issues early, verify implementation of biosecurity controls and support timely response
AG02	Verification of BMP training records to ensure all personnel understand and implement BMP requirements before accessing farmland	Project wide (active work areas)	Verification personal have completed training prior to accessing farmland	Pre-construction; Construction; Operation; Decommissioning	Principal Contractor; TNSP	To ensure BMP requirements training has been provided and understood before accessing farmland

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
AG02	Monitor post-construction rehabilitation and soil condition within the easement, including regrowth, erosion, subsidence and compaction	Reinstated easement areas, excluding tower bases where relevant	Post-construction (in line with implementation of progressive rehabilitation) and ongoing for the agreed rehabilitation period	Construction; Operation	Principal Contractor (post-construction); VicGrid VNI West/TNSP	To verify rehabilitation is performed to agreed standards and land is returned to an acceptable condition for ongoing agricultural use
Air quality						
AQ01	Monitor weather conditions relevant to dust generation, including extreme heat and wind events	Project-wide/active work areas near sensitive receptors	Daily/ongoing during active works, based on forecast conditions	Construction; Decommissioning	Principal Contractor	To provide early warning of conditions likely to increase air quality impacts and enable contingency measures to be implemented
AQ01	Monitor dust generation through routine site inspections and increased inspection frequency where activities are close to sensitive receptors or high-risk dust conditions occur	Active work areas, especially near sensitive receptors	Routine (daily visual observations), with increased frequency in dry/windy conditions or near sensitive receptors	Construction; Decommissioning	Principal Contractor	To provide a measure of the effectiveness of dust controls and trigger additional mitigation or cessation of works where required

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
AQ01; EM09	Monitor and respond to air quality complaints and verified incidents	Complaint location and relevant source area	Event-triggered	Construction; Operation; Decommissioning	Principal Contractor; VicGrid VNI West/TNSP; Principal Contractor for decommissioning	To verify complaints are investigated and that appropriate corrective actions are implemented
Business and economics						
BE01	Monitor implementation of agreed mitigation and support measures for participating businesses under the relevant Business Mitigation and Support Strategies	Participating business locations/eligible businesses	Ongoing during implementation; periodic review as specified in the Business Mitigation and Support Strategy	Construction; Operation	VicGrid VNI West; Principal Contractor; TNSP where relevant	To verify business support measures are implemented and remain responsive to business needs and Project impacts
BE02	Monitor local procurement, business participation and related economic outcome indicators, including uptake by eligible local businesses, social enterprises, relevant Traditional Owner groups/enterprises and Aboriginal-owned businesses	Project-wide, with focus on eligible business/enterprise cohorts	Periodic reporting/regular review during implementation, as specified in project local procurement and business participation plan	Construction; Operation	VicGrid VNI West; Principal Contractor; TNSP where relevant	To verify the maximisation of local and regional business participation opportunities

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
BE03	Monitor implementation and effectiveness of the Tourism Mitigation and Support Strategy	Municipalities/tourism areas affected by the Project	Periodic review during implementation of the strategy, as specified in the Tourism Mitigation and Support Strategy	Operation	VicGrid VNI West; TNSP where relevant	To verify agreed tourism support and mitigation actions are implemented and inform any further adaptive measures
Climate change/greenhouse gas						
GG01	Monitor progress against greenhouse gas reduction targets and implementation of the GHGMP	Project-wide	Periodic, as specified in the GHGMP	Design; Construction; Operation; Decommissioning	VicGrid VNI West; Principal Contractor; TNSP; Principal Contractor for decommissioning	To verify implementation of the GHGMP and progress against emissions reduction commitments
GG03	Monitor SF6 leakage and maintenance performance of relevant equipment during operation	Relevant operational electrical equipment	Routine, in accordance with maintenance schedule and leak detection requirements	Operation	TNSP	To prevent significant fugitive emissions and support maintenance practices that avoid premature replacement
Ecology						

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EC02; EC15	Monitor the success of revegetation, habitat reinstatement and remediation works at locations where these measures are implemented, including vegetation establishment, survival and weed incursion	Reinstated and revegetated areas	As specified in the relevant ecology management plan	Construction; Post-construction; Operation where relevant	Principal Contractor; TNSP where relevant	To verify that reinstatement and revegetation measures are establishing successfully and to identify where supplementary works or adaptive management are required
EC07; EC15	Monitor bird and bat mortality at higher-risk sections of Project infrastructure using a repeatable survey method and frequency specified in the relevant ecology management plan	Higher-risk collision sections, including identified high bird-use areas	As specified in the Collision Risk Management Plan	Construction where relevant; Operation	Principal Contractor; TNSP	To assess the effectiveness of collision risk controls and identify locations where additional controls may be required
EC04; EC09; EC15	Monitor weed establishment and spread in disturbed areas following construction, including areas subject to rehabilitation, revegetation or habitat reinstatement	Disturbed, rehabilitated and revegetated areas	As specified in the relevant ecology management plan and the Biosecurity Management Plan	Construction; Post-construction; Operation where relevant	Principal Contractor; TNSP	To identify weed encroachment associated with Project disturbance and trigger additional weed control where required

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EC02; EC05; EC06; EC15	Monitor the condition and use of artificial hollows, nest boxes, salvaged hollows and other installed habitat features at locations where they are used as habitat replacement or habitat enhancement controls	Locations where habitat structures are installed	As specified in the relevant ecology management plan	Construction; Post-construction; Operation where relevant	Principal Contractor; TNSP	To determine whether installed habitat measures remain functional and are being used by intended species, and to identify where repair, replacement or supplementary measures are required
EC02; EC03; EC09; EC10; EC11; EC15	Monitor the condition and extent of native vegetation, threatened ecological communities, threatened flora and habitat at selected monitoring locations, including impact areas, reinstated areas and reference/control locations where relevant	Impact areas, retained areas, reinstated areas, and reference/control sites where relevant	As specified in the relevant ecology management plan	Construction; Operation	Principal Contractor; TNSP	To verify that Project impacts remain consistent with approvals and management plans and to identify any adverse residual effects requiring management response
EC06; EC12; EC15	Undertake post-construction monitoring required by the Threatened Species Management Plan, including species-specific monitoring at locations and frequencies defined in that plan	Species-specific monitoring locations identified in the TSMP	As specified in the TSMP	Construction; Post-construction; Operation where relevant	Principal Contractor; TNSP	To verify compliance with threatened fauna mitigation requirements and support adaptive management where species-specific impacts are identified

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EC05; EC06; EC07; EC15	Undertake repeatable fauna monitoring at selected higher-risk or indicator locations along the alignment, where identified in the relevant ecology management plans, using methods suitable to the target taxa and location	Selected higher-risk or indicator locations along the alignment	As specified in the relevant ecology management plans	Construction; Operation	Principal Contractor; TNSP	To provide trend information on biodiversity condition in the vicinity of the Project, support stakeholder confidence and provide early warning of potential issues requiring further investigation
EC15	Review and audit implementation and effectiveness of ecology management controls and monitoring requirements, and assess any new or unanticipated ecological effects identified during construction or operation	Project-wide ecology measures	Periodic, as specified in the EMF and relevant plans	Construction; Operation	VicGrid VNI West; Independent Environmental Auditor where relevant; Principal Contractor/TNSP to support	To verify ongoing compliance with ecology objectives and approvals, and ensure new or adverse residual effects are assessed and managed appropriately
EC16	Monitor implementation of the Culturally Significant Species and Materials Salvage Plan, including collection/salvage opportunities, access arrangements and any limitations recorded during construction	Relevant construction areas on Traditional Owner Country, including Crown land where applicable	During relevant construction windows/opportunities	Construction	Principal Contractor; VicGrid VNI West; relevant Traditional Owner groups where applicable	To verify agreed culturally significant species and materials salvage opportunities are implemented in accordance with the plan and relevant access constraints

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EMFI						
EMFI01 EMFI02	As part of detailed design, background electric and magnetic field measurements will be conducted, where required, within the vicinity of the terminal station, reactor station and along representative sections of the transmission line corridor, to establish a reference point for comparison with post-commissioning measurements.	Relevant assessment locations/ infrastructure interfaces	At completion of final design and any required post-design verification	Design; Pre-construction	VicGrid VNI West	To verify final design outcomes remain consistent with assessed EMFI performance requirements

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EMFI04	Following energisation of the terminal station, reactor station and transmission line circuits, site measurements of ground-level electric and magnetic fields will be undertaken where required by the EMFI detailed design and compliance assessment, to confirm alignment with predicted modelling results and support compliance documentation.	Locations as required by the EMFI detailed design and compliance assessment	Following energization of relevant infrastructure	Operation	TNSP	To confirm alignment with predicted modelling results and support compliance documentation.

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
EMFI04	During operation, the need for additional ground-level EMFI measurements must be assessed through the asset operator's EMFI compliance framework and management-of-change process following material design changes, operational changes, asset modifications, or substantiated EMFI-related complaints. Measurements must be undertaken where the assessment identifies that previously modelled or verified conditions are no longer representative, or where compliance needs to be reconfirmed.	Relevant assessment locations/ infrastructure interfaces	As required	Operation	TNSP	To ensure modelled conditions are representative or to confirm compliance where needed.
Geology/contamination/acid sulfate soils						

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
GS01	Monitor, assess and characterise unknown contamination encountered during construction in accordance with the relevant contingency procedures in the CEMP/GMP	Locations where unknown contamination is encountered	Event-triggered	Construction	Principal Contractor	To identify contamination, determine lawful management requirements and implement appropriate corrective measures
GS04	Monitor acid sulfate soil management measures in accordance with the ASSMP for works in identified high-risk areas	Identified acid sulfate soil risk areas/relevant work areas	As specified in the ASSMP	Construction	Principal Contractor	To measure the effectiveness of acid sulfate soil controls and provide early warning of environmental degradation or impacts to surface water, groundwater and soils
Groundwater						
GW01; GW02	Monitor groundwater on a site-specific basis as required under the GMP or where a groundwater impact assessment identifies a potential impact to groundwater receptors	Locations where groundwater impact assessment identifies potential receptor impact	As specified in the GMP/site-specific monitoring program	Pre-construction; Construction; Operation where relevant	Principal Contractor; TNSP where relevant	To minimise potential impacts to groundwater receptors and environmental values of groundwater and to verify effectiveness of mitigation measures

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
GW01; EM07	Monitor groundwater in response to spills or incidents that may affect groundwater, in accordance with the relevant incident response, emergency management or contingency procedures	Spill/incident locations with groundwater risk	Event-triggered, in accordance with incident response, emergency management or contingency procedures	Construction; Operation where relevant	Principal Contractor; TNSP where relevant	To detect groundwater impacts early and inform incident response and corrective action
Historic heritage						
HH EPRs/ relevant consent requirements	Implement and monitor any requirements of approved <i>Heritage Act 2017</i> consents or permits, where monitoring is required	Places/areas subject to Heritage Act consent or permit conditions	As required by the relevant consent or permit	Construction	Principal Contractor	To verify compliance with the requirements and controls included within each consent or permit
Landscape and visual						
LV01	Monitor establishment, effectiveness and maintenance of approved screening vegetation or other visual screening treatments for participating laydown areas and workforce accommodation sites during the agreed period of use and maintenance	Participating laydown areas and workforce accommodation sites	Monthly during establishment and maintenance period (3 months from planting)/or as agreed in the relevant treatment	Construction; Operation where relevant	Principal Contractor; TNSP where relevant	To verify approved screening for temporary sites is established, maintained and functioning as intended

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
LV02; LV03	Monitor implementation, establishment and maintenance of approved visual mitigation, landscape screening and landscaping measures for public locations, community/recreation facilities and eligible dwellings, including replacement of dead or missing plants where required	Participating public locations, community/recreation facilities and eligible dwellings	At least quarterly during the agreed maintenance period (2 years following planting)	Construction; Operation	Principal Contractor; TNSP	To verify approved off-site and public-domain visual mitigation measures are implemented and remain effective during the agreed maintenance period
LV02; LV03	Prepare annual progress reports on implementation of approved visual mitigation and landscape screening measures for public locations and eligible dwellings until the agreed maintenance and monitoring period has ended	Participating public locations and eligible dwellings	Annual (for 2 year monitoring period)	Operation	TNSP	To provide visibility of implementation status and maintenance outcomes for approved off-site visual mitigation measures

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
LV04	Monitor establishment, effectiveness and maintenance of perimeter landscape screening for the Tragowel Terminal Station and Bulgana Reactor Station, including replacement planting where required during the agreed maintenance period	Tragowel Terminal Station and Bulgana Reactor Station	During establishment and agreed maintenance period (2 years following planting)	Construction; Operation	Principal Contractor; TNSP	To verify permanent infrastructure screening is established and maintained to reduce visual impacts from public viewpoints and surrounding public-facing locations
Noise and vibration						
NV01	Monitor construction noise and vibration, including attended monitoring, at the commencement of new activities, at defined intervals, at complaint locations and at other high-risk receivers as required by the Construction Noise and Vibration Management Plan (CNVMP)	High-risk receivers, complaint locations, and locations where structural/utility standards may be at risk	At commencement of new activities and at intervals specified in the CNVMP, and if required to support investigation of any noise/vibration complaints	Construction; Decommissioning	Principal Contractor	To validate predictions, assess the effectiveness of noise and vibration controls and verify compliance with relevant criteria and management commitments (including for complaint investigation where required)

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
NV01	Monitor noise and vibration during Unavoidable Works/out-of-hours works or where structural/utility standards may be at risk, and implement the relevant requirements of the rCNVMP where trigger levels are exceeded	Locations subject to Unavoidable Works/out-of-hours works or other high-risk construction activities	Event-triggered and as specified in the CNVMP	Construction; Decommissioning	Principal Contractor	To confirm predicted levels, verify implementation of relevant noise and vibration controls, and inform corrective action where exceedances occur
NV02	Undertake commissioning noise monitoring (including for low frequency noise) at the Tragowel Terminal Station and Bulgana Reactor Station within six months of commercial operation, and evaluate against relevant standards and guidelines as outlined in the ONMP	Tragowel Terminal Station and Bulgana Reactor Station	Within six months of commercial operation	Operation/Commissioning	TNSP	To assess operational noise levels against the relevant criteria and implement contingency measures (e.g. administrative, operational or engineering controls) as soon as practicable if required
Social						

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
SC01	Monitor implementation, review and reporting of the Social Value Strategy, including progress against its objectives, delivery of agreed initiatives, stakeholder engagement outcomes, governance requirements, and any updates to the strategy	Project-wide/affected communities	At least annually, or as otherwise specified in the Social Value Strategy	Pre-construction; Construction; Operation where relevant	VicGrid VNI West	To verify that the Social Value Strategy is being implemented, reviewed and updated in response to stakeholder engagement, delivery progress and emerging local priorities
SC02	Monitor uptake, delivery and review of independent mental health support initiatives	Affected communities/service delivery area	Periodic review, at least annually	Pre-construction; Construction	VicGrid VNI West	To verify mental health support initiatives remain available, used and responsive to community need
SC03	Monitor workforce accommodation occupancy, access arrangements, Code of Conduct compliance, incidents and complaints associated with workforce accommodation sites	Workforce accommodation sites and nearby settlements where relevant	Ongoing during site establishment and use; incident/complaint-triggered where relevant	Design; Pre-construction; Construction	VicGrid VNI West; Principal Contractor	To verify workforce accommodation and behaviour controls are implemented and effective in avoiding and minimising adverse impacts on surrounding communities

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
SC04; EM08; EM10	Monitor effectiveness of social information sharing, fact sheet updates, community issue-specific communication and staff/contractor awareness activities (e.g. provision of timely, accessible and regular communications regarding key environmental and safety issues)	Project-wide/affected communities	Ongoing/periodic as information changes	Construction; Operation	VicGrid VNI West; Principal Contractor; TNSP	To verify timely and accessible communication of social, environmental and safety issues relevant to affected communities
SC05	Monitor local labour market conditions and Project-related workforce pressures, including workforce origin, local and regional participation, uptake of training and employment pathways, and feedback from councils, employment providers and local businesses	Project-wide/impacted LGAs	Periodic review, at least annually and prior to key workforce transition periods	Pre-construction; Construction; Operation where relevant	VicGrid VNI West; Principal Contractor	To verify that Project workforce demand is managed to avoid or minimise adverse impacts on local labour markets, businesses and services, while supporting local workforce participation

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
SC06	Monitor implementation of any agreed council support arrangements and review cumulative resourcing issues raised by councils	Relevant councils in the social locality	Periodic review/as agreed with councils	Pre-construction; Construction	VicGrid VNI West	To verify agreed council support arrangements are being implemented and remain responsive to Project-related resourcing impacts
SC07	Monitor social impacts, implementation of social measures and commitments, and public reporting under the SIMP	Project-wide/affected communities	As specified in the SIMP, including periodic public reporting	Pre-construction; Construction; Operation; Decommissioning	VicGrid VNI West	To compare actual impacts with forecast impacts, support adaptive management and provide transparent social performance reporting
Surface water						
SW01	Monitor surface water quality on a site-specific basis where construction works are within relevant setback distances to waterways or where runoff may affect receiving waters, as required by the SWMP	Relevant waterways and receiving waters near works/discharge points	As specified in the SWMP	Design; Construction	Principal Contractor	To provide a measure of the effectiveness of surface water controls and identify where corrective actions are required

Relevant EPR	Monitoring	Location	Frequency	Project phase(s)	Assigned responsibility	Objective(s)
SW01; SW03	Undertake baseline and construction-phase water quality monitoring upstream and downstream of designated works areas and discharge points, as required by the SWMP	Upstream and downstream of designated works areas and discharge points	Baseline plus regular construction phase monitoring as specified in the SWMP	Design; Construction	Principal Contractor	To establish baseline conditions, detect water quality impacts and inform management response
Traffic and transport						
TT01	Monitor Project traffic volumes generated during construction against predicted traffic volumes at subject locations along project roads and review the need for additional controls where volumes materially exceed predictions	Routes and road network used by Project traffic, with locations as specified in the TMP	Ongoing during construction/as specified in the TMP	Construction	Principal Contractor	To understand traffic generation and verify whether further mitigation or scheduling changes are required
TT04	Monitor road condition on roads, bridges and culverts used by Project construction traffic, including routine inspections and recording of pavement defects	Roads, bridges and culverts used by Project construction traffic	Routine inspections during construction	Design; Construction	Principal Contractor; VicGrid VNI West/TNSP where relevant	To understand road use and potential impacts and provide insight to relevant road authorities

