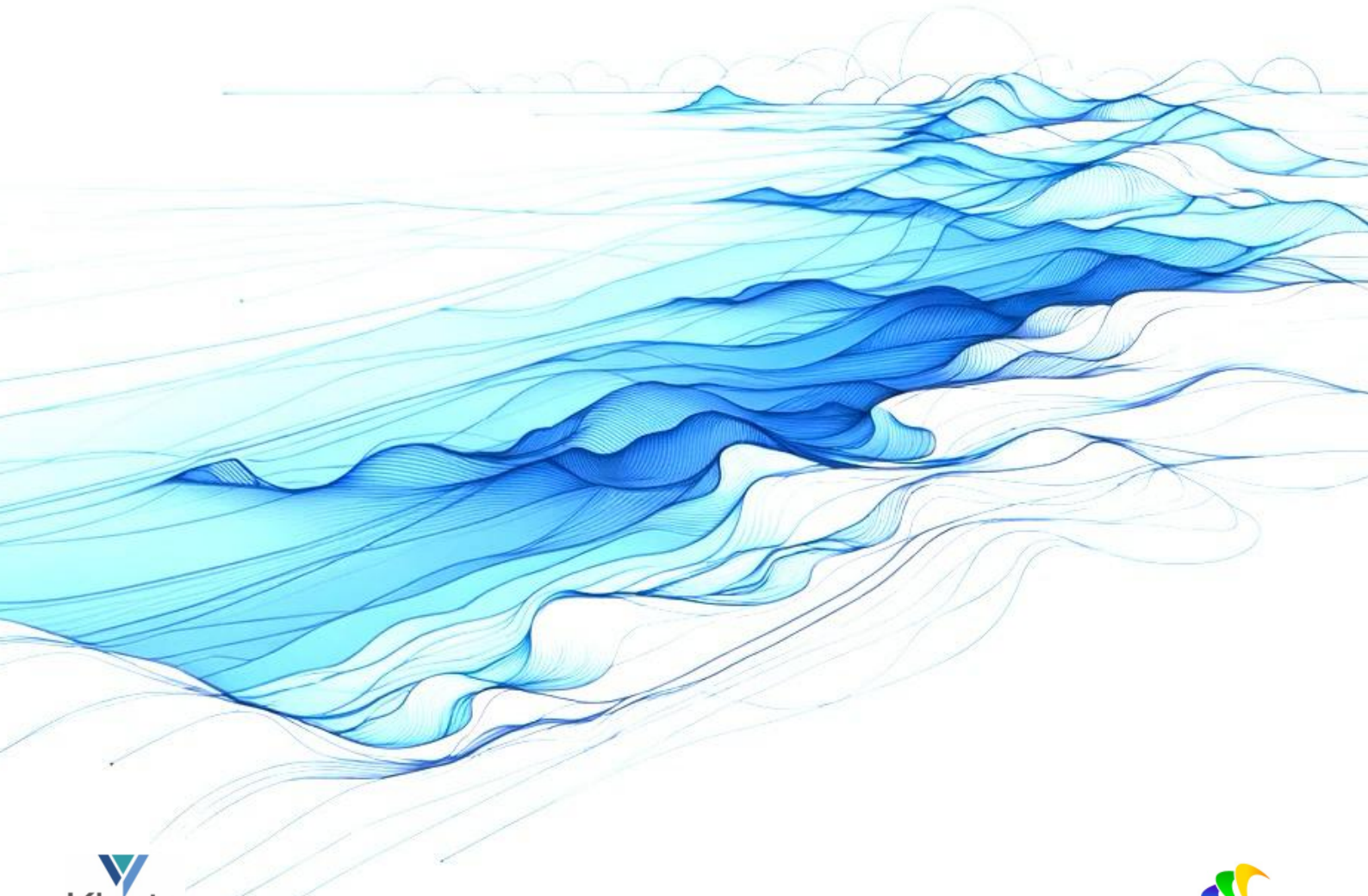
REGIA
Marine Seismic Survey

# Implementation Strategy

Appendix B3: REG-EP-006-B3

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Klarite

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# 1 Introduction

This document has been prepared to support CGG Services (Australia) Pty Ltd (**CGG**) in its environmental management of the Regia Marine Seismic Survey (**Regia MSS**). The Implementation Strategy follows a standardised methodology for monitoring and managing environmental performance of offshore petroleum activities and has been developed by CGG over many years of successfully operating in Australia without major incidents.

# 2 Purpose

This document aims to communicate the basis for environmental performance monitoring and management before, during and after the proposed Regia MSS. It is structured to align with the prescribed content of an implementation strategy as per Section 22 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023 (**the Regulations**).

# 3 Consultation Input

CGG carried out the consultations required by the regulations to:

- Improve the predictive quality of this assessment by seeking relevant person input into the preparation of the EP.
- To verify the description of the environment that CGG produced as part of its environmental assessment process through information provided to CGG by relevant persons.
- Receive objections or claims about the adverse effects of the activity on a relevant person's functions, interests, or activities.

The information received from relevant persons can be found in each relevant person consultation report. It has been considered in the preparation of this assessment.

Objections or claims about the adverse of the effects of the activity can also be found in each relevant person's consultation report. They have been assessed for merit and CGG has written a statement of its response to each objection or claim. Any objection or claim relevant to this assessment and subsequently considered in its preparation can be found in Annex 3 - Objections and Claims raised from consultation.

# 4 Implementation Strategy

This implementation strategy has been developed to comply with the requirements of Section 22(1) of the Regulations and describes the specific measures and arrangements that will be implemented for the duration of the activity to ensure that:

- All environmental impacts and risks of the activity will be continually identified and reduced to a level that is as low as reasonably practicable (**ALARP**).
- Management and mitigation measures detailed in the EP are effective in reducing the environmental impacts and risks of the activity to ALARP and acceptable levels.
- Environmental performance outcomes and standards set out in the environment plan (**EP**) are met.
- Arrangements are in place to respond to, and monitor impacts of, oil pollution emergencies.
- Consultation is maintained throughout the activity as appropriate.

The implementation strategy outlines a systematic approach that describes:

- The management systems by which the management and mitigation measures identified in the impact and risk assessment will be implemented.
- The implementation of management and mitigation measures will be monitored to ensure environmental risks continue to be managed to ALARP.
- The ongoing consultation process prior to and during the activity.
- Monitoring, auditing, and reporting of environmental performance for activities carried out under the EP.
- Arrangements in place to respond to, and monitor impacts of, oil pollution emergencies.

The implementation strategy for this EP has considered lessons learnt from the implementation of previous campaigns and inspection recommendations.

# 5 Section 22(2): Environmental Management System

The Regia MSS will be conducted under the framework of the CGG Environment Policy (Appendix A1), CGG Environmental Management Procedure, CGG Health, Safety, Environment and Social Responsibility Operating Management System (**HSE-OMS**) and the survey and support vessel's HSE Management System.

The activity will also operate under an activity specific HSE Plan that CGG, and the vessel operators will develop together. The HSE Plan is a tailored document that ensures CGG's environmental management standards and intended environmental performance outcomes are achieved at an operational level throughout the activity. The HSE Plan identifies and enables the selected seismic and support vessels contractor's own procedures to be utilised where appropriate, for example, for specific vessel operational control measures. At all times, however, the seismic and vessel contractors will be required as a minimum to comply with all relevant requirements of CGG's HSE policies and standards. As described in CGG Environment Management Procedure, the HSE Plan will incorporate regulatory and EP requirements including procedures for the following:

- Emergency response.
- Waste management.
- Hazardous materials and handling.
- Fuel/oil spills.
- Bunkering.
- Light.

The seismic and vessel contractor's HSE documentation will be reviewed for compliance with the relevant requirements described in this EP prior to the commencement of the activity. In the event of a gap between the existing plans and procedures and the requirements of this EP, a bridging document will be developed to ensure all control measures are adequately covered in the implementation of the EP and the hierarchy of control established.

## 5.1 Specific measures to continually identify and reduce risks to ALARP

CGG is required by its corporate policies and the Regulations to continually improve its performance. This includes adopting specific measures to continually identify and reduce risks to ALARP. The risk pathways identified by the environmental assessments include:

- Release of material or waste overboard.
- Collisions with marine fauna.
- Introduction of invasive species.
- Accidental release of fuel.

The following sections describe the processes that will be in place to ensure these risks are continually monitored and reduced to ALARP.

The following measures will be in place to continually identify and reduce the risk of release of materials and waste overboard to ALARP:

- Raising awareness about the requirements and handling of garbage in the activity inductions that are attended by all personnel deployed offshore.
- Vessel audits will confirm garbage segregation and enclosed storage of garbage.
- Investigation of any reported loss of waste or materials overboard.

The measures in place for fauna detection greatly exceed the usual requirements that apply to transiting vessels for protection of marine fauna. Similarly, the measures in place to detect marine

fauna, and continually reduce the impacts from elevated level of sound, will apply equally to the management of this risk.

The measures in place to continually identify and reduce risks from invasive marine species are all inspection based. Details can be found in Section 5.6.3.

Under the OPGGS (Environmental) Regulations, NOPSEMA requires that a petroleum activity have an accepted **Oil Pollution Emergency Plan** (**OPEP**) and **Operational and Scientific Monitoring Plan** (**OSMP)** (as part of the EP acceptance) in place before the activity commences. In the event of a vessel loss of containment, the OPEP and OSMP will be implemented. CGG has adopted an OPEP, OPEP testing arrangements, and an OSMP. These are each described in more detail below.

### 5.1.1 Oil Pollution Emergency Plan

This section satisfies regulations sections 22(8), 22(9), & 22(11). The OPEP is available in Appendix G3. The OPEP consists of the following:

- Survey / support vessel(s) SOPEPs[1]
- CGG Regia MSS OPEP[2]

These response arrangements are consistent with, and supported by, the:

- National Plan for Maritime Environmental Emergencies (NATPLAN): Australian Maritime Safety Authority (**AMSA**) – has jurisdiction and is the Control Agency for vessel spills, which affect Commonwealth waters.
- State Hazard Plan for Maritime Environmental Emergencies (State Hazard Plan): The Victorian Department of Transport and Planning (**DTP**) is the Control Agency for marine oil spills in Victorian state waters.

The seismic and support vessels (if ≥400 gross tonnes) must have IMO compliant SOPEP, prepared in accordance with IMO guidelines for the development of shipboard oil pollution emergency plans (resolution MEPC.54 (32) as amended by resolution MEPC.86 (44)), include oil spill response arrangements and provisions for testing the SOPEP (oil pollution emergency drills).

CGG will ensure that support vessels under 400 gross tonnes (that are not obligated legislatively to have a SOPEP), do have vessel-specific spill response plans (to an equivalent standard) that cover spill response arrangements. The SOPEP is designed to ensure a rapid and appropriate response to any oil spill and provide practical information required to undertake a rapid, effective response, and reporting procedures in the event of a spill.

### 5.1.2 OPEP Testing

This section satisfies regulatory sections 22(12), 22(13) & 22(14). The OPEP will be tested:

- Prior to the survey commencing.
- Following any significant amendment of the response arrangements.
- When a new seismic vessel is engaged for the activity.
- Not later than 12 months after the most recent test.

[1] Required for vessels ≥400 gross tonnes involved in the survey or equivalent for lesser tonnage vessels that manage the environmental impacts of a spill and vessel-based operational monitoring (agreement OPRC 90)
[2] This document supports the individual vessel-based SOPEPs by detailing the interaction between contractor-related spill response plans and CGG response arrangements.

Vessel-based SOPEP tests are undertaken by vessels routinely as per MARPOL Annex I (Section 15) requirements, and drill outcomes reviewed as part of the ongoing monitoring and improvement of emergency response control measures.

A desktop drill of the Regia MSS OPEP, including the vessel SOPEP, will be conducted to assess the effectiveness of the response arrangements. Specifically, the drill will be completed at least 8 weeks prior to carrying out the activity and will test the following:

- Roles and responsibilities of those involved in oil spill response are clear and understood.
- Communication sequence from the vessel master to vessel-contractor onshore management and the Control Agency, including notification of the AMSA JRCC is adequate, current and includes all relevant details.
- Communication between the CGG offshore representative and CGG Acquisition Project Manager and subsequent notification authorities is adequate and timely.
- Ensures Type 1 operational monitoring such as spill surveillance and tracking is appropriate, understood and practised.
- Equipment and procedures intended for source control on-board the vessels are available for use as outlined in the vessel SOPEP.

The outcomes of the drill will be documented, reviewed and improvements identified (as needed). Should any inadequacies, altered contractual arrangements or improvements to arrangements be identified via testing, these corrective actions will be registered as a non-conformance and the EP/OPEP will be amended for these items via a Management of Change process.

### 5.1.3 Operational and Scientific Monitoring Program

This section satisfies regulations section 22(10). The Regia MSS Operational and Scientific Monitoring Program (OSMP) is available in Appendix G3. The OSMP has the following objectives:

- Identify high priority protection areas within the Environmental Planning Area.
- Specify monitoring methodologies.
- Detail the process CGG will follow to determine the monitoring studies that will be implemented to:
    - Provide situational awareness and assist in planning and execution of spill response to minimise environmental harm.
    - Provide for short-term and long-term environmental damage and recovery assessments.

## 5.2 Specific measures to continually identify and reduce impacts to ALARP

CGG is required by its corporate policies and the Regulations to continually improve its performance. This includes adopting specific measures to continually identify and reduce impacts to ALARP. The impact pathways identified by the environmental assessments include:

- Physical presence of vessels
- Elevated levels of sound
- Elevated levels of light

The following sections describe the processes that will be in place to ensure these impacts are continually monitored and reduced to ALARP.

### 5.2.1 Otway Adjustment Protocol

The Otway Adjustment Protocol (OAP) has the following features:

- As a minimum, claims processes for direct losses from:
  - Accidental damage or loss of deployed fishing equipment caused by the presence of the seismic vessel (either repair or replace).
  - Displacement for increased transit times, which result in increased fuel and crewing costs from moving fishing locations,
  - Reduced catch per unit effort if survey acquisition timing directly overlaps a previously fished area, within the fishing season, demonstrated by the reported data.
- The claims process will require a fisher to provide evidence (or authorisation to access evidence) for claimed losses that enables a calculation of how much compensation may be due.
- Details about the role, responsibilities, and instructions for nominated claims assessors who will be third parties to the titleholder.
- An assessment report on each claim will be provided by the claim assessor to the titleholder and the claimant.
- The assessment report will include the details and methodology used to conclude the claim and an Outcome Notification.
- There will be a dispute mechanism requiring additional assessment by a different assessor.
- Applies to fishing cooperatives who can provide evidence of commercial losses because of the survey.
- Adjustment can be claimed for up to 30 days after the completion of each activity.
- A claim can be lodged up to 180 days after the completion of the activity.
- Subject to a claim being lodged, a suitably experienced/qualified independent person/organisation will be engaged by the titleholder as the assessor of the claim, in consultation with the claimant.
- Appropriately documented claims will be assessed, in accordance with the processes outlined in the OAP, and completed within 30 days of receipt of the required data.
- Successful claims will receive compensation within 30 days of the Outcome Notification being executed.

The claim assessor(s) will be suitably experienced and qualified and is defined as a person or organisation with proven demonstrated experience in data analysis and data auditing processes and procedures within the fishing industry. Nominees for claims assessors can be made by titleholders and claimants and then agreed upon before the commencement of a claim.

There is a claims process specified in the OAP, which will be followed by the titleholder and the claims assessor. If a claimant disagrees with a claim assessment outcome, and an agreement cannot be reached between the titleholder and the claimant, the claimant may, within 30 days of receipt of the Outcome Notification, request that a suitably experienced/ qualified independent third-party is engaged to review and determine the outcome of the claim. The independent expert reviewer must provide a view as to whether the claim assessment process has been conducted in line with the requirements of the OAP. The independent expert reviewer may also consider any additional information deemed appropriate by them, including information provided by either the claimant or the titleholder. An independent expert review decision may differ from the initial assessment outcome. Protocol review and maintenance (Appendix G4, section 4) is detailed below in section 8.2.

### 5.2.2 Petroleum SIMOPS Plan

It is possible that the acquisition may come within proximity of gas production facilities in the region. A simultaneous operations plan will be developed if the seismic vessels or any equipment will enter within 5km of the 500 m Petroleum Safety Zone of the Thylacine-A platform.

### 5.2.3 Diving SIMOPS Plan

CGG will provide the opportunity for commercial divers (e.g. dive schools and commercial divers) to develop a simultaneous operations (SIMOPS) plan consistent with the DMAC guidelines. This means that divers and CGG will need to communicate when the survey vessel is acquiring within 40 km of known dive sites. To ensure that recreational divers are aware of the SIMOPS Plan adverts will be place in local newspapers and at local dive shops with an invitation to participate. This will be part of the ongoing consultation plan (Section 8).

### 5.2.4 SRW Coastal Monitoring Program Implementation Plan

Appendix G5 sets out how CGG will operationalise the SRW Coastal Monitoring Program. It explains the practices, processes, roles and decision-making pathways that govern a pre-survey monitoring effort is delivered safely, consistently, and with sufficient rigour to support real-time mitigation when the survey commences. This document translates the commitments made in Appendix F3 into clear, actionable processes for day-to-day implementation by monitoring teams, advisers, contractors and vessel crews. The purpose of this document is to establish a dedicated, operationally robust monitoring programme that detects the presence and movements of SRW along the south-west Victorian coastline before and during the Regia MSS. Its key objectives are to:

1. Provide real-time, reliable detection of SRWs within the broader Otway offshore region using coordinated coastal, aerial, and drone-based monitoring methods.
2. Support mitigation and shutdown decisions by supplying timely and verified whale presence information to the Survey Environment Adviser (SEA).
3. Integrate coastal monitoring with other detection platforms to add to the continuous, multi-lines-of-evidence management system.
4. Ensure compliance with regulatory requirements and with the SRW National Recovery Plan by maintaining effective detection capability throughout the SRW season (May–October).
5. Provide clear deployment, escalation, and response procedures tailored to different weather conditions so that monitoring coverage remains effective and safe across variable operational environments.

### 5.2.5 Active Source Area Reduction

Reduction of the Active Source Area (ASA) to reduce uncertainty associated with unnecessary operation of the sound source in areas proximate to sensitive nearshore (shallower) areas would further reduce impacts. The ASA has been progressively reduced throughout the preparation of this EP. It is likely that the survey areas will continue to reduce in nature and scale as operations draw closer. Therefore, to reduce impacts from underwater sound emissions CGG will ensure the minimum size of the ASA and limit sound accumulation outside of the primary geophysical target area. This will be adopted as a part of producing the sail line plan so that once the final sail lines are known the ASA is reduced to its smallest viable size.

## 5.3 Specific measures to ensure effectiveness of control measures

There are several processes that will be used to ensure that, for the duration of the activity, control measures detailed in Appendix G1 are effective in reducing the environmental impacts and risks of the activity to ALARP and an acceptable level. These include processes for:

- Management of change
- Environmental assessment
- Management of knowledge
- Management of communications
- Management of adverse weather
- Contractor and supplier management

### 5.3.1 Acquire seismic on paper workshop

The Acquire Seismic on Paper (ASOP) workshop is a practice designed to bring all stakeholders, technical staff, and decision makers together, from all companies working on the project to share knowledge, identify any project risks, and map out possible improvements before the operations phase.

There will be a term of reference agreed between CGG and the vessel contractors to govern the scope, content, and conduct of the ASOP. The ASOP will:

- Occur prior to the commencement of the survey.
- Rehearse predictable scenarios during seismic operations.
- Ensure all attendees are familiar with the planned operations of the survey and have access to relevant spatial data (e.g. survey boundaries, sensitive species BIA's).
- CGG will commission an ASOP report to record any adjustments to the EP or operational procedures and the attendees at the workshop.
- Involve all operational stakeholders including relevant environmental experts.
- Involve the marine fauna expert panel when discussing implementation of the Fauna Management Plan (FMP).

### 5.3.2 Management of Change Process

The primary purpose of managing change is to re-evaluate the predicted levels of environmental impacts and risks and perform an updated assessment of whether the decision-making criteria are still met. This is the assessment of whether a change can be managed such that the activity continues to manage environmental impacts and risks to as low as reasonably practicable and to an acceptable level.

The following activities will trigger a management of change (**MoC**) process:

- A new scope (e.g., timing, location, or changes to operational details such as vessel type, equipment, processes, or procedures), which has the potential to impact on the environment not assessed for environmental impact previously or authorised in existing management plans and procedures.
- Change to the existing activity, scope, equipment, process, or procedures, which have the potential to impact on the environment or interface with an environmental receptor (responsibility of the CGG Acquisition Operations Manager).
- Changes in the external environment managed and monitored by the CGG Acquisition Operations Manager.
- Provision of new information that differs to that included in this EP, such as:

  - Potential changes in scientific knowledge regarding impacts and risks from seismic activities
  - New environmental sensitivities within or adjacent to the Activity Planning Area.
  - Issue of new regulatory requirements (e.g., Australian Marine Parks (AMP) Management Plans).
  - Identification of Key Ecological Features (KEFs), threatened or migratory species or critical habitats or biologically important areas (BIAs) not identified in the EP.
- Identification of new stakeholder objections or claims that are assessed to have merit.
- Non-conformances (audits, inspections, etc.) which identify management and mitigation measures may no longer manage environmental impact/risk to ALARP or acceptable criteria. Non-conformances are monitored by the Environmental Officer.
- Incidents which identify new or increased impacts and risks arising from activities not previously identified in the accepted EP. Incidents are monitored by the Environmental Officer.

Any change relevant to the environmental management of the activity shall be directed to the CGG Acquisition Operations Manager and Environment Officer for initial assessment. The change shall be assessed for environmental impact/risk in accordance with the CGG Risk Management and MoC Process and any implications determined for the environment and associated regulatory document revisions.

Additional management and mitigation measures identified as part of the MoC that avoid, minimise, limit, or mitigate environmental impacts and risks will be captured in the relevant documents and the change to those documents recorded. Changes to any management and mitigation measure being relied on for the management of environmental impacts and risks will require a reassessment of whether the impact or risk being considered remains of an acceptable level and reduced to ALARP. The appropriateness of the environmental performance outcomes (**EPO**s) and environmental performance standards (**EPS**s) set for the activity will also be reassessed. For changes identified in the impact and risk assessment process, if relevant persons' interests, activities, or functions are affected by the change, they will be advised, and feedback invited on the proposed change.

Any new information, changes or updates considered via the MoC process will also be considered against Section 39 of the Regulations, to determine if resubmission of the EP to NOPSEMA is required. Consideration of the triggers for resubmission will occur after the MoC has been completed and will either result in a major revision (meaning a resubmission to NOPSEMA is required) or a minor revision.

Major revisions to the Environment Plan can arise from many circumstances including but not limited to:

- Before commencement of a new activity.
- Before the commencement of any significant modification or new stage of the activity that is not provided for in the accepted EP.
- Before or, as soon as practicable after the occurrence of any significant new or significant increase in environmental impact or risk, including a series of new or increased impacts or risks.
- If there is a change in titleholder that will result in a change in the way the environmental impacts and risks of an activity are managed.
- If the updated predictions of environmental impacts or risks exceed or may exceed the defined acceptable levels of impacts or risks in the in-force environment plan.
- If the assumptions made in the in-force environment plan about the predicted levels of environmental impacts or risks or defined acceptable levels are proven incorrect/inaccurate.
- In the event of legislative change driven by new case law.
- Requirements relevant to the activity or environmental feature being considered.

Minor revisions to the Environment Plan are likely to include:

- Administrative changes that are identified during operation of the Environment Plan (e.g. document references, contact details, etc.)
- A review of the activity/change and the environmental impacts and risks of the activity/change does not trigger a requirement for revision under the Regulations (Section 39 and Section 40).
- An improvement to a level of environmental performance.

Where amendments are made to the accepted EP/OPEP via the CGG MoC process, revisions made will be justified, tracked and a comprehensive record of the revision kept for each change. This includes all risk assessments associated with MoC activities. CGG will not use the MoC process to materially degrade or diminish the set levels of environmental performance.

### 5.3.3 Environmental Assessment

CGG's impact and risk management method is based on the principles, framework and processes defined by the International Standards Organization (**ISO**) 31000:2009 Risk Management – Principles and Guidelines. Each assessment process has the following components.

- Setting the context, scope, and criteria of the assessment.
- Identifying, analysing, and evaluating the impact or risk in an iterative assessment.
- Treating the impact or risk
- Communicating throughout the assessment.
- Monitoring and review throughout the assessment.

#### 5.3.3.1 Impact Assessment Process

The impact assessment process in preparation of the EP identified the following environmental aspects and subsequent environmental impacts from planned events.

- Artificial Light
  - Change in ambient light
  - Change in fauna behaviour
- Underwater Sound
  - Change in ambient sound
  - Change in fauna behaviour
  - Change in hearing capacity
  - Change in physical condition
- Physical Presence
  - Change in functions, interests, or activities

CGG analysed each impact and assigned a level of effect and uncertainty, which in combination give a resultant predicted level of impact. The criteria used in this analysis and the impact assessment matrix can be found in Annex 1 – Impact Assessment Tables. These same criteria will be used by CGG if an impact required reassessment because of a management of change process.

#### 5.3.3.2 Risk Assessment Process

The risk assessment process in preparation of the EP identified the following environmental aspects and subsequent environmental risks from unplanned events.

- Accidental Release of Fuel
  - Change in water quality
  - Change in sediment quality
  - Change in ecosystem dynamics
  - Change in physical condition
  - Change in fauna behaviour
  - Change to functions, interests, or activities

  - Change in aesthetic value
- Introduction Of Marine Pest Species
  - Change in ecosystem dynamics
  - Change to functions, interests, or activities
- Accidental Release of Materials or Waste Overboard
  - Change in physical condition
  - Change to functions, interests, or activities
  - Change in aesthetic value
- Collisions With Marine Fauna
  - Change in physical condition

CGG analysed each risk and assigned a level of likelihood and consequence, which in combination give a resultant predicted level of risk. The criteria used in this analysis and the impact assessment matrix can be found in Annex 2 – Risk Assessment Tables. These same criteria will be used by CGG if a risk required reassessment because of a management of change process.

#### 5.3.3.3 Application of the Hierarchy of Controls

The "hierarchy of controls" (Regia definition "measures") is a philosophy used in occupational health and safety management to minimize or eliminate workplace hazards. It can be easily adapted to environmental management. Applying the hierarchy involves a systematic approach to controlling hazards by implementing a series of control measures, with each measure building on the previous one in terms of effectiveness. The five levels of the hierarchy of controls, in order of effectiveness, are:

1. **Elimination**: The most effective measure is to avoid or eliminate the aspect completely. This involves removing the aspect from the activity, so that receptors are no longer exposed. It is typically achieved by adopting an activity limitation.
2. **Substitution**: If avoidance is not feasible, the next best measure is substitution. This involves replacing the cause of one aspect with another, less hazardous one. This can most effectively be done by adopting activity limitations.
3. **Control measures**: If substitution is not feasible, the next best measure is a control measure. This involves adopting a system, procedure, or item of equipment to reduce exposure. It can also involve specifying a level of performance of a person.
4. **Administrative measures**: If control measures are not feasible, the next best measure is an administrative measure. This involves changing management system elements (practices, resources, processes, or responsibilities) to reduce exposure.
5. **Protective measures:** The least effective measure is protective measures. This involves implementing management plans to monitor and adapt to circumstances with protective measures, monitoring equipment, or devices to reduce exposure levels. Protective measures are the last line of defence and should only be used when other measures are not feasible.

In summary, the hierarchy of controls philosophy emphasizes the importance of using the most effective measures first, with less effective measures used only when more effective measures are not feasible. CGG will apply this hierarchy when considering how to reduce the levels of impact or risk in an assessment/reassessment.

### 5.3.4 Management of Knowledge Process

To support implementation of this EP, all staff and contractors engaged in the Regia MSS will be provided access to the accepted EP through the Regia MSS Consultation Hub. All contractors will also have access to the following documents in full:

**Implementation Strategy Documents**

1. Implementation Strategy (Appendix B3)
2. Fauna Management Plan (Appendix G2)
3. Oil Pollution Emergency Plan (OPEP) (Appendix G3)
4. Operational and Scientific Monitoring Plan (OSMP) (Appendix G3)
5. Petroleum SIMOPS Plan
6. Diving SIMOPS Plan
7. On Water Communications Plan
8. Consultation Plan
9. Sea Country Protection Plan
10. Sail Line Plan
11. Project HSE Plan
12. Emergency Response Plan
13. Garbage Management Plan(s)
14. Vessel Lighting Management Plan(s)
15. Shipboard Oil Pollution Emergency Plan(s) (SOPEP)

**Registers**

16. Environmental Compliance Register
17. Corrective Actions Register

**Supporting Documents**

18. Environmental Performance Outcomes and Standards (Appendix G1)
19. Description of Activity – Activity Limitations (Appendix A2)
20. Marine Assurance Audit Tools (e.g., OVID-style inspection checklist)
21. Acquire Seismic on Paper (ASOP) Report
22. Otway Adjustment Protocol (Appendix G4) (www.omicc.com.au)

These documents will be made available through vessel document management systems and project information platforms accessible to vessel crew, onshore support teams, and third-party contractors as appropriate. Personnel will also be briefed on the content and relevance of these documents during pre-commencement inductions and ongoing toolbox sessions.

This ensures all personnel responsible for implementing mitigation measures or monitoring environmental performance have direct access to the current versions of the documents that inform their responsibilities.

A check of the currency of the environmental knowledge that underpins the environmental assessments for the activity will be carried out one month prior to the survey commencing. This will include a review of any information received through ongoing consultation and a re-run of the Protected Matters Search Tool with comparison to previous results. Any changes will be subject to the management of change process.

CGG recognises that other parties (petroleum titleholders, commercial shipping, offshore wind proponents, research institutions, and government agencies) may have activities that offer insights and knowledge that may be useful for environmental management such as marine fauna detections or research. Table B3-1 identifies actions to be carried out to search for new information from third parties with activities in the area and try to improve the effectiveness of mitigation measures.

*Table B3-1 - Third party knowledge sharing efforts*

| Third Party | Action | Reason | Mitigation Measure |
|---|---|---|---|
| **Arthur Rylah Institute** | Update on the planning for the activity and the Regia marine fauna detection activities.<br>Request to share information before, during and after the activity with their citizen science program for SRW observations. | To assist data exchange, gathering, and mitigation actions. | Environment Advisor – Responsibility to establish relationships and attempt to facilitate data exchange. |
| **DEECA** | Seek information about SRW research priorities and actions and offer to exchange information on SRW detections. | To ensure that all available detection information is available to CGG to be able to detect the start/end of migration of SRW into the reproduction BIA. | |
| **Amplitude Energy, ConocoPhillips Australia, Beach Energy, Woodside Energy** | Seek to exchange information on whale detections, success of whale mitigation measures, and technology trials. | To learn from other activities fauna detections near the survey. | |
| **Spinifex Offshore Wind Project** | Seek to exchange information on whale detections from any PAM systems that the Spinifex Offshore Wind Project has deployed and detections from the survey. | | |

#### 5.3.4.1 Pre-survey Knowledge Assessment

At least eight weeks prior to the survey commencement, the CGG Acquisition Project Manager and Environment Officer shall undertake pre-survey knowledge assessment that will review and consider the following as a minimum:

- Community and relevant person notification requirements.
- New issues or concerns raised by relevant persons.
- Changes to relevant legislation or regulatory guidelines.
- Existing information in relation to any component of the receiving environment (including BIAs, AMPs).
- Re-run the PMST searches to check for changes to listed/threatened species.
- Search the NOPSEMA website and consult with any new titleholders to determine the presence of other seismic operations overlapping the proposed activity.
- Changes to commercial fishery licence areas, fishery status, current fishing effort and licence holders overlapping the Regia MSS Environment Planning Area based on:
  - Status reports and available data sources such as FRDC, IMAS for fisheries and aquatic resources.
  - Information provided directly by fishers, VFA, and AFMA through the relevant person consultation process.

  - Fishing locations.
  - Spawning information relevant to key indicator species.
- Newly available scientific literature.
- New acoustic source technology and justification for or against its implementation.
- Confirmation of emergency (oil spill) contacts.

If new information regarding the receiving environment relevant to the activity is present, then a management of change assessment will be carried out.

#### 5.3.4.2 Reporting

There will be a **Daily Operations Report** prepared during the survey to provide a comprehensive record of project activity, vessel performance, environmental monitoring, and health, safety, and environmental (HSE) measures. These reports are structured to support regulatory compliance, operational oversight, and environmental risk management, and their preparation will include the following content areas:

- Operational Summary: A detailed account of seismic acquisition progress, including the status of each survey line (e.g., completed, in progress, or aborted), acquisition parameters, production totals (in kilometres and square kilometres), and any operational interruptions such as equipment downtime or weather delays.

- Activity Timeline and Performance Metrics: A breakdown of 24-hour vessel operations, categorised into productive acquisition time, technical downtime, and standby time (particularly for marine mammal mitigation). Performance statistics track cumulative progress and provide insight into daily and project-wide acquisition efficiency.

- Marine Fauna Observations and Mitigation: Records of marine mammal detections (both visual and acoustic), associated mitigation actions (e.g., soft start delays or shutdowns), and species-specific sighting data. Reports also include commentary on the implementation of environmental management plan requirements.

- Health, Safety, and Environmental (HSE) Reporting: Documentation of crew exposure hours, safety meetings, drills, toolbox talks, and observation cards (including positive behaviours, hazards, or unsafe conditions). Summary statistics highlight safety performance across all support and survey vessels.

- Technical Commentary: Notes on streamer and source performance, positioning data quality, noise levels, and any operational issues encountered during acquisition. Data quality assessments from seismic processing teams may also be included.

- Support Vessel and Logistics Updates: Status of supporting vessels (e.g., crew changes, bunkering operations, transit), as well as updates on small boat activity for in-sea equipment maintenance or crew transfers.

- Environmental and Weather Conditions: Recorded weather states relevant to operational planning and visual observation capability, along with forecasts to inform short-term scheduling.

In preparing similar reports for future projects, teams should ensure coordination across operational, technical, HSE, and environmental personnel to provide timely, accurate, and integrated information that meets both internal management needs and external compliance requirements.

### 5.3.5 Management of Communications Process

This management process applies to internal communications. For external communications please see Section 8.

Any modification to the assumptions or basis of the EP that arise because of the implementation of the Environmental Management System will be communicated using the Chain of Command. This includes timely notification of any modifications to the EP because of managing change, knowledge, or adverse weather.

The seismic and vessel contractors will be responsible for keeping its workforce informed about environmental issues. The Party Chief acts as a focal point for personnel to raise environmental issues, and consults/involves all personnel in the following:

- Issues associated with the implementation of the EP.
- Any proposed changes to equipment, systems, or methods of operation of plant, where these may have environmental implications.
- Any proposals associated with continuous improvement of environmental protection, including the setting of environmental objectives and training schemes.
- Regular HSE meetings will be held on the seismic vessel. The issues discussed and actions taken will be recorded. The minutes of each meeting, including action items from the meetings, will be made available to all personnel.

Other forms of internal communication include toolbox meetings, which occur before every critical or unfamiliar job. This meeting includes all personnel involved in the task and will include aspects such as spill prevention requirements, etc.

The Report on Consultations (Appendix C1 and C2) documents all commitments made to relevant persons in relation to notifications about the activity and the progress of the survey.

### 5.3.6 Management of Adverse Weather Process

It is the duty of the Vessel Master to act as the focal point for all actions and communications with regards to any emergency, including response to adverse weather or sea state, to safeguard his vessel, all personnel on board and the environment.

During adverse weather the Survey and Support Vessel Masters are responsible for:

- Ensuring the safety of all personnel on board.
- Monitoring all available weather forecasts and predictions.
- Initiating the vessel safety management system, vessel HSE procedures and/or vessel ERP.
- Keeping the Party Chief and CGG Site Representative fully informed of the prevailing situation and intended action to be taken.
- Assessing and maintaining security, watertight integrity and stability of vessel.
- Proceeding to identified shelter location(s) as appropriate.
- Other appropriate responsibilities shall be taken into consideration as dictated by the situation.

In addition to in-vessel VHF Marine Radio Weather Services, daily weather forecasting from a designated weather forecast will be provided (if available) to monitor weather within the Operational Area over the duration of the survey.

Should poor/bad weather be imminent/encountered, the Vessel Master shall implement weather monitoring to assess conditions on site. The amount of monitoring and subsequent action would be

dependent on the severity of the bad weather front and resulting actions will comply with the seismic contractor's procedure for Severe Weather Monitoring.

The CGG Acquisition Operations Manager shall ensure adequate weather forecasting is available at an increased frequency as the severity escalates.

### 5.3.7 Contractor and Supplier Management Process

Seismic and vessel contractors considered for the Regia MSS will be assessed against, and meet the following criteria:

- Compliance with all statutory requirements.
- Have an acceptable HSEQ performance record in undertaking seismic activities.
- Have a Vessel Lighting Management Plan to minimise light emissions while meeting vessel navigational light requirements.
- Provide evidence of resources and competency in the services to be provided.
- Services, procedures, and vessel hardware comply with the requirements of this EP.
- Any equipment to be used in the provision of survey services meets regulatory requirements, is fit-for-purpose and has all equipment, testing and verification certificates.
- Specific requirements, which need to be assessed at tender evaluation stage include the acoustic source is confirmed to be 2,820 $in^3$ or less.
- Specific requirements, which need to be assessed at tender evaluation stage include a preference to select vessels:
  - Whereby refuelling at sea is not required.
  - That are double bottomed.
  - That have double walled fuel tanks.
- Specific requirements that need to be assessed prior to vessel mobilisation include all vessels transiting to the Otway must be assessed for biofouling risk and have the relevant biosecurity clearance.

All contracted vessels will undergo a PAM-readiness assessment during mobilisation planning to determine whether they can safely and effectively support PAM systems. PAM-ready vessels will be preferentially selected and mobilised where commercially and operationally feasible. Where PAM integration is not practicable due to vessel configuration, safety constraints, or technical limitations, the basis for infeasibility will be documented, and alternative monitoring arrangements will be implemented to maintain the required whale-detection capability in accordance with the EPOs.

Prior to the survey, CGG will undertake an audit/inspection of each vessel as detailed in Section5.6.3.

## 5.4 Specific measures to ensure environmental performance is being met

The following resources, processes or practices are used to ensure that environmental performance outcomes and environmental performance standards are being met for the duration of the activity.

There are several resources that support the implementation, monitoring and review of the EP. These are listed below and those without explanation in other parts of the EP are described in the subsequent sections:

- Fauna Management Plan (Appendix G2).
- Oil Pollution Emergency Plan (OPEP) (Appendix G3)
- Operational and Scientific Monitoring Plan (OSMP) (Appendix G3).
- Petroleum SIMOPS Plan (Section 5.2.2).

- Diving SIMOPS Plan (Section 5.2.3).
- On Water Communications Plan (Section 5.4.1).
- Consultation Plan (Section 5.4.2).
- Project HSE Plan.
- Emergency Response Plan.
- Garbage Management Plan(s) and Garbage Record Book(s).
- Vessel Lighting Management Plan(s).
- SOPEP(s).
- Sail Line Plan (Section 5.4.4).
- Sea Country Protection Plan (5.4.5).

### 5.4.1 On water Communications Plan

This plan covers all on-water external communications with other marine users. All project vessels will have means of communication with each other and other marine users. Project vessels are equipped with suitable and fully functioning navigation aids, including automatic identification systems (AIS). Competent crew members ensure 24-hour visual, radio, and electronic surveillance to enhance navigational safety. This plan documents all the methods of communication on the water (primary and alternatives) and when these are required to occur.

### 5.4.2 Consultation Plan

The Consultation Plan is designed to establish an organized and efficient process for consulting with, and gathering feedback from, relevant persons throughout the lifecycle of the activity. It includes practices that will identify, engage, and respond to relevant persons, ensuring that their concerns and perspectives are considered and addressed.

The **Consultation Plan** comprises a variety of techniques to ensure that external parties (relevant State and Commonwealth authorities and other relevant interested persons) are appropriately kept informed about the activity. The consultation plan ensures that relevant persons and local communities are informed about the progress of the activity at the frequency requested during preparation of the EP. There are various people involved in ensuring that the communications plan is followed with the overall responsibility for ensuring the performance residing with the Environment Advisor. Relevant details of the **Consultation Plan** are provided in Section 8.

### 5.4.3 Fauna Management Plan

The Fauna Management Plan (**FMP**) (Appendix G2) governs the protection of marine fauna interactions during the survey. It sets up a moving 40 km horizontal field-of-view as a detection area for marine fauna around the sound source. The FMP has clear guidance for pre-survey and on-water actions to protect marine fauna, along with shoreside support, decision, and review mechanisms to improve the fauna management system over time. The FMP has:

- Roles and responsibilities for staff involved in the protection of marine fauna and functions as the primary document that ensures the EPO's related to protection of marine fauna will be met.
- Has specific procedures for various stages of the activity.
- Includes the requirement for soft starts.

### 5.4.4 Sail Line Plan

The sail line plan is a resource primarily in place to ensure that activity is carried out by the contractor to the specifications of CGG. It includes spatial and technical data consistent with the description of activity including the limits and boundaries of the operational area and acquisition area for operation of the seismic source and excised zones. The MSS acquisition lines will be acquired working from:

- Deep lines to shallow lines if the survey period is between September to December

The sail line plan includes all the specifications of the acoustic source and streamer configuration, and all activity limitations as specified in Appendix A2.

The sail line plan will be provided to the seismic contractor for agreement before the survey begins, and all variations to the plan will be agreed upon and documented in writing between CGG and the seismic contractor.

The sail line plan will:

- List the activity limitations in Appendix A2, Section 4 of the accepted EP.
- Include maps for the operational area, acquisition area, depth contours, and distances related to environmental management control measures.
- Include sail line pre-plots for acquisition.
- Include instructions on how to optimise sail lines and the communication associated with adapting the survey due to operational and environmental constraints.
- Be communicated during the ASOP workshop.
- Be signed off and accepted by the party chief of the vessel contractor.

Prior to the sail line plan being signed off, the Environmental Advisor will ensure that the Active Source Area will be reduced to its smallest viable size.

### 5.4.5 Sea Country Protection Plan

Considering the regulatory environment governing offshore petroleum activities and the increasing emphasis on cultural heritage protection, CGG implemented a Sea Country Protection Program (**SCPP**). The Regia MSS EP identified that offshore petroleum activities can affect tangible and intangible cultural interests, values and sensitivities, on or related to Sea Country, as described in Appendix F3, section 3.16, particularly those associated with marine fauna, and they should be protected when appropriate.

The SCPP is a mechanism that facilitates the identification and management of new information, relevant to the activity, through collaboration of First Nations people who decide to be part of the program.

Activities able to be undertaken through the SCPP include:

- Facilitation of First Nations knowledge holder participation on expert whale panel (Event ID EVT352)
- Potential funding for spiritual permission or healing with consent from Traditional Owners.
- Opportunities for other parties to contribute to further the growth and scope of the program if it continues to be effective.
- Provision of fauna monitoring data

### 5.4.6 Chain of Command

A clear chain of command for the shore-based and vessel-based roles relating to the Regia MSS is provided in Figure B3-1. Upon contract award, and during evaluation of the contractor's management system, specific on-board positions will be identified who are responsible for specific management and mitigation measure implementation.

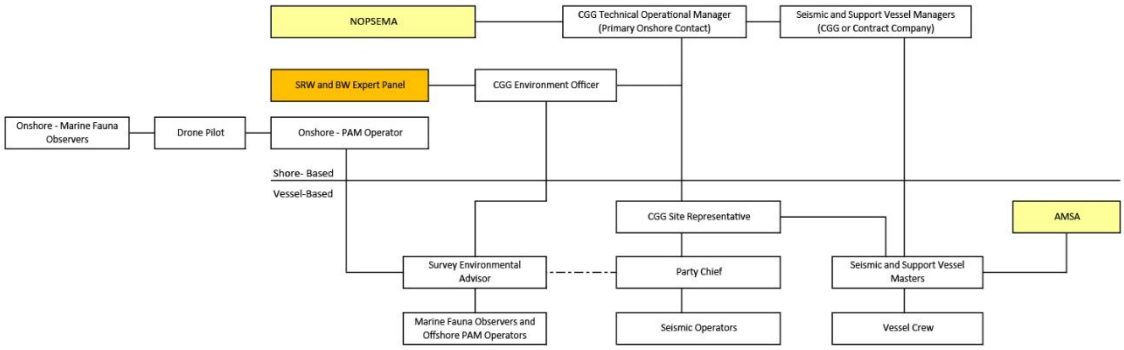



*Figure B3-1 - Regia MSS Organisation Structure.*

### 5.4.7 Roles and Responsibilities – Implementation, Management & Review

The roles and responsibilities for personnel involved in this activity in relation to implementation, management, and review of this EP, are described in Table B3-2.

*Table B3-2 - Roles and Responsibilities - Implementation, Management & Review*

| Role | **Responsibilities in relation to the implementation, management, and review of the EP** |
|---|---|
| **CGG Acquisition Operations Manager** | Ensure the activity is undertaken as per the environmental performance outcomes of the EP. |
| | Provide sufficient resources to implement management and mitigation measures to achieve the performance outcomes of the EP. |
| | At least four weeks prior to the survey commencement undertake the ASOP (Section 5.3.1) |
| | Monitor and ensure the close out of corrective actions raised from environmental inspections/audits or incidents. |
| | Initiate the end of activity review with the seismic contractor and document lessons learnt. |
| | Ensure incidents are fully investigated and corrective actions monitored to close-out and ensure that all incidents are properly reported. (Section 5.6.5) |
| | Commission audit and inspections. (Section 5.6.3) |
| **Environment Officer** | Ensure that the activity specific induction is completed by all project personnel. (Section 5.5.1) |
| | Review results of conformance audits conducted during the program and make recommendations where required. |
| | Develop and maintain the **Environmental Compliance Register** for the activity, detailing the environmental commitments, performance outcomes and standards and measurement criteria in the EP. |
| | Oversee the implementation of the management of change process. (Section 5.3.2) |
| | Develop and maintain a **Corrective Actions Register** and communicate the status of actions to the CGG Acquisition Operations Manager. |
| | Ensure data and records are collected for the **Post-survey Environmental Performance Report** (PEPR) and prepare the report. |
| | Convene and coordinate the Expert Panel as part of the **Fauna Management Plan**. |
| | Prepare the **Monthly Environment Report** (MER) and submit to NOPSEMA. |
| | Sightings and survey information are to be recorded within the 'Cetacean Sightings Application' (CSA) software. |
| | Maintain regular contact with third parties offer to share marine fauna detections in return for the same information. Increase efforts for the real-time exchange of information during the 90 days of the survey. |
| | Upon completion of the survey, export the information reported to the CSA as a text file. |
| **Seismic and Support Vessel Managers (CGG or Contractor Company)** | If contractor's HSE documentation is not compliant with the relevant requirements described in this EP develop a bridging document to ensure all management and mitigation measures are in place. |
| | Ensure that the documents specified in the management of knowledge are available aboard. |
| | Provide access to the vessels for audits and inspections. |

| Role | **Responsibilities in relation to the implementation, management, and review of the EP** |
|---|---|
| | Ensure vessels are compliant with maritime standards that will be audited as part of CGG's Marine Assurance System. |
| **CGG Site Representative (Primary Vessel-based Contact)** | Facilitate clear communications between the persons identified in this EP. |
| | Monitor and report on the conformance of all EP commitments through observations and assessments of performance against the measurement criteria. |
| | Review the seismic and vessel contractor's HSE documentation for compliance with the relevant requirements described in this EP prior to the commencement of the activity. |
| | Assist with review, investigation and reporting of all environmental incidents and ensure they are reported to the CGG Acquisition Operations Manager. |
| | Ensure day-to-day activities are monitored for conformance against this EP and the outcomes are reported to the CGG Acquisition Operations Manager. |
| | Perform MMO duties when the dedicated MMO is unable to, such as during short break periods. |
| **Party Chief** | Ensure safe execution of all operations carried out by the seismic crew aboard the survey vessel, in accordance with the EP. |
| | Ensure the control measures adopted within this EP relating to operation of the seismic source are implemented to minimise potential environmental impacts resulting from seismic acquisition (e.g., pre-watch, soft-start procedures, stop-work procedures) |
| | Ensure equipment used on site is inspected before use and as required during survey. |
| | With assistance from others, inspect and maintain equipment, including environmental equipment, and maintain all statutory test and inspection documentation for the marine equipment. |
| | Provide a daily log of activities and environmental incidents to the CGG Site Representative. |
| **Survey Environmental Advisor (SEA)** | Coordinate the implementation of the **Fauna Management Plan** offshore and provide advice to the Party Chief on actions to be taken. |
| | Undertake audits and inspection under direction. (Section 5.6.3) |
| | Assist in preparation of external regulatory reports required for the survey. |
| | Collate data for the **Monthly Environment Reports** (MER) and the PEPR and prepare the offshore parts of the MER. |
| | Monitor the implementation of the environmental performance standards on the survey and support vessels. |
| **Seismic and Support Vessel Masters** | Responsible for the overall HSE performance of the vessel against the legislative requirements and any applicable measures in the EP. |
| | Ensure the safe execution of all operations of the vessel. |
| | Communicate with other marine users and follow the On-Water Communications Plan. |
| | Support the CGG Site Representative in ensuring that all relevant HSE documents are understood and adhered to. |
| **Seismic Operators Vessel Crew** | Conduct activities in a professional and safe manner with attention to good housekeeping procedures and work practices. |
| | Undertake Regia MSS induction. |
| | Immediately report any incidents to the Survey Vessel Master or Party Chief. |
| | Encourage improvement in environmental performance wherever possible. |
| | Report any marine fauna sightings to the SEA. |

There are further responsibilities for the personnel involved in marine fauna management located in the **Fauna Management Plan**. There are also responsibilities for measuring the environmental performance of control measures in meeting the environmental performance outcomes, which can be found in the performance tables in Appendix G2.

### 5.4.8 Roles and Responsibilities – Emergency Conditions

The roles and responsibilities for personnel involved in this activity in relation to emergencies or potential emergencies are described in Table B3-3. Emergencies or potential emergencies are defined in this section to be any breach, or potential breach, of a requirement of the EP as well as the responsibilities in emergency response. Additional roles and responsibilities as they relate specifically to oil spill response are detailed in the Oil Pollution Emergency Plan (**OPEP**) which is available in Appendix G3.

*Table B3-3 - Regia MSS Roles and Responsibilities – Emergency Conditions.*

| Role | Responsibilities during emergencies or potential emergencies |
|---|---|
| **CGG Acquisition Operations Manager (Primary Shore-based Contact)** | Commit resources to facilitate an emergency response strategy in the event of an incident. |
| | Complete the notifications detail within the OPEP. |
| | Review and send incident reports to regulators and others as defined in the OPEP. |
| | Manage the CGG emergency response strategy in the event of an incident. |
| **CGG Environment Officer** | Manage any oil spill monitoring requirements as per the OSMP. |
| | Confirm the high priority protection areas. |
| **Seismic and Support Vessel Managers (CGG or Contractor Company)** | Timely communication of emergencies or potential emergencies within the Chain of Command. |
| **CGG Site Representative (Primary Vessel-based Contact)** | Immediately alert the CGG Acquisition Operations Manager of any changes in operations, which could impact negatively on environmental performance or for changes in operation, which alter the environmental risk profile of the activity. |
| **Party Chief** | Immediately notify the CGG Site Representative of any incidents/activities arising from seismic operations that are likely to have a negative impact on the performance outcomes detailed in this EP. |
| **Survey Environmental Advisor (SEA)** | Notify NOPSEMA in the event of a fauna collision. |
| **Seismic and Support Masters** | Notify AMSA, CGG Site Representative and Vessel Manager in the event of a notifiable oil spill or the accidental release of waste overboard. |
| | Implement the vessel's SOPEP and OPEP procedures in the event of an oil spill, including first response to an incident using the resources immediately available to the vessel. |
| | Immediately notify the CGG Site Representative of any incidents/activities arising from vessel operations that are likely to have a negative impact on the performance outcomes detailed in this EP. |

### 5.4.9 Emergency Response

CGG's emergency preparedness and response arrangements will be included within the Project HSE Plan. In addition, the seismic and support vessels will be expected to have a vessel-specific Emergency Response Plan (**ERP**) and SOPEP. These documents will be reviewed by CGG to ensure they meet the requirements for emergency and oil spill response specified within this EP. As the Regia MSS is vessel-based, it is considered appropriate that operational response to an emergency would be handled by CGG using their existing emergency response procedures and the vessel-specific ERP and SOPEP. The ERP, SOPEP and OPEP will be tested prior to the commencement of the survey as detailed in Section 5.1.2.

CGG reviews specific activities, equipment, and workplaces to identify possible emergency situations that may arise. CGG would ensure that any subcontracted vessel operator has established systems to ensure emergency plans are developed, implemented, and maintained and that these plans address those incidents that are reasonably foreseeable. Information that is considered when identifying potential emergency situations include the following:

- Results of hazard identification and impact/risk assessments.
- Legal requirements.
- Previous incident (including accident) and emergency experience.
- Emergency situations known to have occurred in similar organisations.
- Information related to accident and/or incident investigations posted on the websites of regulators or emergency response agencies.
- The Project HSE Plan contains instructions for vessel emergency, medical emergency, search and rescue, reportable incidents, incident notification and contact information to ensure that:
  - All potential emergencies are identified.
  - Emergency response plans are documented, accessible and clearly communicated.
  - Roles and responsibilities are clearly defined.
  - Adequate equipment, facilities and trained personnel are available to respond to emergency situations to mitigate adverse consequences.
  - Inspection and testing of critical emergency equipment is performed.
  - Emergency drills and exercises are conducted to assess emergency response capacity and capabilities.
  - Lessons learned are communicated to the appropriate people.

## 5.5 Awareness of EP Responsibilities

This section addresses regulation section 22(4).

### 5.5.1 Activity Specific Inductions

All personnel involved with the Regia MSS will be given an activity-specific environmental induction prior to commencing work. This induction will cover environmental responsibilities relevant to the duties and responsibilities of the roles including:

- Environmental sensitivities and conservation values in the EP.
- Environmental impacts and risks associated with the activity.

- Waste management and chemical management procedures (including the vessel **Garbage Management Plan**).
- Minimising light emissions at night by turn-off unnecessary lighting and using the black out curtains provided.
- Emergency response and spill management procedures outlined in the OPEP and vessel SOPEP.
- Procedures for marine fauna interactions as per the **Fauna Management Plan**.
- Roles and environmental responsibilities of key personnel on board the survey and support vessels.
- The importance of following procedures and using company processes to identify environmental risks and mitigation measures.
- Environmental performance outcomes, standards, and measurement criteria to be complied with under the EP.
- Procedures for reporting environmental hazards, incidents, near misses and opportunities for improvement.
- Opportunities for employee communication and participation.
- Relevant plans and procedures (CGG, seismic and support vessel contractor owned), including where they can be obtained on board the vessels.

A record of the induction will be retained by CGG's Acquisition Operations Manager with the endorsement of personnel who attended. All personnel are required to sign an attendance sheet to confirm their participation in and understanding of, the induction. If a contractor is used, they will conduct their own company and vessel-specific inductions independently and in addition to the activity-specific HSE induction.

### 5.5.2 Competency and Ongoing Awareness

It is ultimately CGG's responsibility to ensure all employees and contractors comply with the requirements of the CGG corporate HSE Policy and that the personnel are suitably trained and competent in their respective roles.

CGG will ensure the marine crew are trained and competent to undertake their respective activities on board the vessel. All marine personnel will be qualified in accordance with the International Convention on Standards of Training Certification and Watch Keeping for Seafarers (STCW95).

CGG will ensure marine fauna observers (**MFO**s) and passive acoustic monitoring (**PAM**) operators are trained and competent, and will have the following experience:

- 1x Lead Marine Fauna Observer: Minimum of 2 years' experience and a minimum of 12 months experience working in Australia.
- 4x (1 of which will be relief) Marine Fauna Observers: Minimum of 12 weeks experience.
- 1x Lead PAM Operator: Minimum of 2 years' experience and a minimum of 12 months experience working in Australia.
- 1x PAM Operator: Minimum of 12 weeks experience.

The Whale Expert Panel will consist of a minimum of four experts and will have the following experience:

- 1x SRW expert with experience with SRW in southern Australia: Will have a PhD in Southern Right Whales in Australia and have experience in Southern Right Whale detections and observations.

- 1x BW expert with experience with BW in southern Australia: Will have a PhD Blue Whales in Australia and have experience in Blue Whale detections and observations.
- 1x Marine mammal expert with experience with whale observations/detections in southern Australia: Will have formal qualifications in marine science with a focus on marine mammals and have experience in observations and detections of marine mammals in Australia.
- 1x CGG representative will have experience and understanding of seismic surveys, and the EP requirements.

The following activities will serve to reinforce and maintain ongoing environmental awareness of vessel personnel for the Regia MSS. Records will be produced for each of these meetings:

- Project kick-off meeting: Held at the start of the activity and reviews the contractual and HSE specifications for the activity, the scope of work, vessel specific HSE plans, environmental outcomes, performance standards and measurement criteria within this EP.
- Daily progress meetings (on board): Review all survey operations and incidents of the previous day, actions are recorded within the daily progress report.
- Toolbox meetings: Attended by all personnel involved in a specific operation (i.e. operations involving major hazards and/or involving more than one person). This meeting reviews the activity and reinforces the adoption of control measures within this EP to prevent adverse environmental and safety impacts. Recorded within the daily progress report.

All personnel will be encouraged to communicate any concerns, suggest improvements to the control measures implemented for any task or operation during the activity and comment on any proposed changes to equipment, systems, or methods of operation of equipment, where these may have HSE implications. Opportunities for personnel (including management, relevant contractors and MMOs) to participate in improving the management of environmental risks during the activity include:

- At the time of the induction.
- During daily toolbox and pre-start meetings at the commencement of each shift and prior to commencing a new task (e.g. recovery of streamer).
- Identification of hazards based on incident and near miss reporting.
- Providing suggestions for improvements to the CGG Site Representative at any time.

CGG crew and contractors (including all vessel personnel) will be provided information on employee communication and participation during the environmental induction prior to commencing the activity.

## 5.6 Managing Environmental Performance

The following sections address regulation section 22(5).

### 5.6.1 Monitoring of Environmental Performance

CGG will monitor the performance of the management and mitigation controls during the activity in line with the **Project HSE Plan**. Environmental performance during the survey will be reviewed to ensure that:

- EPOs and EPSs are being met, reviewed and where necessary amended (to continue to reduce the environmental impacts and risks of the activity to ALARP).
- Potential non-conformances and opportunities for continuous improvement are identified and corrective actions implemented.
- All environmental monitoring requirements have been met before completing the activity.

### 5.6.2 Recording of Environmental Performance

CGG will develop and maintain an electronic **Environmental Compliance Register** for the activity, which includes all commitments made in the EP, including the:

- Environmental performance outcomes, standards and measurement criteria
- Description of Activity (Appendix A2)
- Activity limitations
- Implementation Strategy (this document)
- Any other commitments made in the EP

The Environmental Compliance Register is an audit tool to be used during the activity to demonstrate conformance of the activity with the EP.

A summary of the environmental management and mitigation controls, performance outcomes and standards and measurement criteria in the EP will be distributed aboard the survey and support vessels, and implementation of the environmental performance standards will be monitored by the Survey Environmental Advisor.

### 5.6.3 Audits and Inspections

Post acceptance of the EP, conformance will be monitored on an at least quarterly basis by the CGG Site Representative, or delegate, via audits and inspections, as well as through the commitments under the Management of Risk, Management of Change, and Management of Knowledge parts of this Implementation Strategy. There will also be the following audits and inspections:

| Compliance Check | Compliance Activity | Scope and Purpose | Occurrence |
|---|---|---|---|
| **Audit** | Vessel contractors' pre-qualification assessment | All vessels: To ensure vessel biofouling controls meet these EP requirements. This functions as an audit of vessel contractors prior to contractual terms are signed. | Once prior to contract signing. |
| | | Vessels over 400GT: Vessels with double-walled fuel tanks or internal fuel tanks will be preferred in contractor selection. | |

| Compliance Check | Compliance Activity | Scope and Purpose | Occurrence |
|---|---|---|---|
| | | All vessels: To receive the light management plan for the vessel. | |
| **Inspection** | OVID-Style Inspection | All vessels: To verify the validity and compliance of certificates required by COLREGS, the Navigation Act, SOLAS and various Marine Orders, and the presence of a vessel bunkering procedure and a Shipboard Oil Pollution Emergency Plan (SOPEP), tailored to the vessel's class and operational requirements. | Once prior to survey start. |
| | | All vessels: To gather evidence that:<br>• Shows the sound source and towed streamers have been inspected and cleaned (where required) prior to deployment.<br>• Each vessel has conducted pre-port entry checks using the National Introduced Marine Pest Information System database and assess changes in known invasive species.<br>• Ballast water exchange activities have been conducted exclusively in open waters, avoiding areas designated as Marine Protected Areas (AMPs), to prevent environmental contamination. | |
| | | All vessels: To confirm the presence, awareness, and utilisation of a vessel specific light management plan, shielded lighting, dimming technologies, and blackout curtains. | |
| | | All vessels: To confirm the on-board spill response capability against the vessels SOPEP or equivalent and relevant management and mitigation controls in this EP, to verify spill preparedness. | |
| **Audit** | Commencement audit | Confirm that the vessel management systems are consistent with the management and mitigation controls detailed in the in-force EP. | Once within the first 7 days of the survey starting. |
| | | Ensure all vessels and contractors have access to the following appendices: A2, B3, G1 and G2. | |
| | | Conformance with regulatory requirements detailed in the **Environmental Compliance Register.** | |
| | | Emissions and discharges are being monitored, measured, and documented. | |

| Compliance Check | Compliance Activity | Scope and Purpose | Occurrence |
|---|---|---|---|
| **Audit** | Daily report review | The purpose of auditing daily seismic and HSE reports is to verify that they accurately document survey activities, environmental monitoring, and safety performance, and that they meet regulatory, contractual, and internal reporting obligations. These audits help ensure the reports are suitable for compliance tracking, stakeholder communication, and operational oversight.<br>The scope of the audit includes reviewing a sample of reports to confirm they consistently cover:<br>• Operational data: acquisition activity, production figures, vessel and equipment status.<br>• Environmental monitoring: marine fauna detections, mitigation actions, weather and visual effort.<br>• HSE performance: crew exposure hours, incidents, toolbox talks, drills, and observations.<br>• Technical quality: seismic data integrity, equipment performance, and navigation accuracy.<br>• Structure and presentation: clarity, completeness, and readiness for integration into broader reporting.<br>Audits use a structured checklist to assess completeness and traceability, with outcomes supporting continuous improvement and assurance that the reports meet their intended purpose. | At least weekly or on request. |

### 5.6.4 Review of Environmental Performance

The following arrangements will be established to review the environmental performance of the activity:

- Inspections of the vessels will be carried out before and during the survey to ensure that procedures and equipment for managing routine discharges and emissions are in place to enable conformance with the EP.
- The performance of items of equipment as described in this EP will be checked to ensure ongoing reduction of risks and impacts to ALARP, and any potential issues (i.e. observations of poor operating condition/performance or non-conformances) are continually monitored and raised as soon as practicable.
- Records of inspections against EP requirements are documented in the **Environmental Compliance Register**.

An end of activity review will be jointly conducted by CGG and the seismic contractor during a post-survey meeting. The purpose of this meeting is to enable the review of management and mitigation strategies implemented during the activity. It includes reviews of performance, incident investigations, audits and field activity to identify actions for future seismic surveys, which can be implemented on a continuous improvement basis. The end of survey HSE Review will include a

'Lessons Learnt' section to facilitate incorporation of any recommended improvement actions in future seismic activities.

### 5.6.5 Management of Non-Conformance

Non-conformances and opportunities for improvement will be identified and corrective actions will be tracked to completion utilising the Environment Compliance Register. Corrective actions will specify the remedial action required to fix the breach and prevent its reoccurrence and is delegated to the person deemed most appropriate to fulfil the action. CGG will carry forward any areas of non-conformance identified during its previous activities for consideration in future seismic activities to assist with continuous improvement in environmental management. Non-conformances may necessitate a management of change and/or a management of knowledge process to be implemented.

# 6 Monitoring of Emissions and Discharges

## 6.1 Monitoring Emissions and Discharges

In accordance with regulations section 22(6) the titleholder shall record emissions and discharges for the duration of the activity. Discharges associated with a survey will be limited to those allowed for under maritime law. Therefore, all discharges will be recorded and controlled in accordance with maritime monitoring and recording requirements. Any non-compliance with discharge requirements will be included in the monthly recordable incident report to NOPSEMA.

# 7 Environmental Performance Reporting

This section addresses regulation section 22(7).

## 7.1 Regulatory Reporting

CGG will submit an environmental performance report to NOPSEMA within three months of survey completion. CGG will publish the same environmental performance report at the same time as submission to NOPSEMA on the Regia MSS Consultation Hub.

## 7.2 Notifications and Reporting

Under Sections 24(c) and 47 of the Regulations, CGG is required to notify NOPSEMA of any recordable (an incident arising from the activity that breaches an EPO or EPS in the EP that applies to the activity that is not a reportable incident) and reportable (an incident arising from the activity that has caused, or has the potential to cause, moderate to significant environmental damage) incident within a specified timeframe. Environmental incidents will be reported to the relevant government agency by the CGG Site Representative. The requirements for reporting and recording incidents are outlined in Table B3-4.

Following any recordable or reportable incident, CGG will undertake an incident investigation, and this information will be communicated to all relevant personnel. All recordable and reportable incidents will be documented by the CGG Acquisition Operations Manager and will include details of the event, immediate action taken to control the situation, and corrective actions to prevent re-occurrence. The CGG Acquisition Operations Manager and CGG Site Representative will follow up actions taken to ensure that the corrective actions have been taken to close it out. When planning future activities, CGG will review the reportable and recordable incidents that have occurred previously to incorporate any lessons learned as part of CGG's continual improvement process.

*Table B3-4 - Notification Requirements.*

| Requirement | Timing | Contact |
|---|---|---|
| **Recordable Incidents** | | |
| As a minimum, the written monthly recordable incident report must include a description of:<br>All recordable incidents, which occurred during the calendar month.<br>All material facts and circumstances concerning the incidents that the operator knows or can reasonably find out.<br>Any actions taken to avoid or mitigate any adverse environmental impacts of the incident.<br>Corrective actions that have been taken, or may be taken, to prevent a repeat of similar incidents occurring. | As soon as possible but before the fifteenth day of the following calendar month. | NOPSEMA - submissions@nopsema.gov.au |
| **Verbal Notifications** | | |
| Vessel-sourced spill in Commonwealth waters. | Within one hour | JRCC Australia:<br>Phone: +61 2 6230 6811 or 1800 641 792<br>Facsimile: +61 02 6230 6868 |

| Requirement | Timing | Contact |
|---|---|---|
| Reportable incidents include, but are not limited to, those that have been identified through the risk assessment process as having an inherent impact consequence of 'significant', 'major' or 'critical', or at a minimum, the following incidents:<br>• A level 2 spill incident<br>• Vessel strike / entrapment or entanglement with listed marine fauna.<br>• IMS Introduction.<br>The notification must contain:<br>• All material facts and circumstances concerning the incident.<br>• Any action taken to avoid or mitigate the adverse environmental impact of the incident.<br>• The corrective action that has been taken or is proposed to be taken to stop, control or remedy the reportable incident.<br>This must be followed by a written record of notification ASAP after notification. This written notification must also be supplied to the NOPTA and DEECA (Vic) for Commonwealth water incidents. | Within two hours | Verbal:<br>NOPSEMA – Phone 1300 674 472<br>DEECA (Vic) – 0419 597 010<br><br>Written notifications:<br>NOPSEMA – submissions@nopsema.gov.au<br>DEECA – marine.pollution@ecodev.vic.gov.au<br>NOPTA – reporting@nopta.gov.au |
| If an oil pollution incident occurs within or approaches an AMP, or where an oil spill response action must be taken within an AMP, the Director of National Parks (DNP) must be contacted immediately. Information, which must be provided within that notification includes:<br>• Titleholder details<br>• Time and location of the incident (including AMP likely to be affected)<br>• Proposed response arrangements as per OPEP<br>• Confirmation of providing access to the relevant monitoring and evaluation reports when available<br>• Contact details of the emergency coordinator. | As soon as possible and prior to response action being taken, as far as reasonably practicable | Verbal:<br>Director of Marine Parks – 0419 293 465 (24hr Marine Compliance Officer)<br>Written Notification:<br>marine.compliance@environment.gov.au |
| Notify DCCEEW of any death or injury of a listed threatened species; all cetacean species; listed migratory species or listed marine species. | Within seven days | Phone: +61 2 6274 111<br>Phone: 1800 803 772<br>Email: EPBC.Permits@environment.gov.au |
| **Written Incident Reports** | | |

| Requirement | Timing | Contact |
|---|---|---|
| Verbal notification of a reportable incident to NOPSEMA (Commonwealth waters) must be followed by a written report. As a minimum, the written incident report will include:<br>The incident and all material facts and circumstances concerning the incident.<br>Actions taken to avoid or mitigate any adverse environmental impacts.<br>The corrective actions that have been taken, or may be taken, to prevent a recurrence of the incident.<br>The action that has been taken or is proposed to be taken to prevent a similar incident occurring in the future. | Within three days of notification of incident (NOPSEMA)<br>Within seven days after submission to NOPSEMA (NOPTA). | NOPSEMA - submissions@nopsema.gov.au<br>NOPTA – reporting@nopta.gov.au |
| Vessel strike with cetacean is reported to the DCCEEW. | Within 72 hours of incident | Upload information to: https://data.marinemammals.gov.au/report/shipstrike |
| **Heritage Notifications** | | |
| Heritage Victoria must be notified in accordance with s80 of the Heritage Act 2017 (Vic) or under Underwater Cultural Heritage Act 2018 (Cth).<br>A further notification must be given to the Minister as per s40 of the Underwater Cultural Heritage Act 2018 (Cth). | As soon as practicable. | Email: heritage.victoria@delwp.vic.gov.au<br>Phone 03 7022 6390 |

## 7.3 External Routine Notification and Reporting Requirements

Review of statutory and stakeholder requirements with respect to routine external notification and reporting is provided in Table B3-5. These actions are the responsibility of the CGG Acquisition Operations Manager (or delegate).

*Table B3-5 - External Routine Notification and Reporting Requirements.*

| Requirement | Timing | Contact |
|---|---|---|
| **Routine Performance Reporting** | | |
| The Regulations - Section 51: Submit an EP Performance/Compliance Report to NOPSEMA. This reports compliance against each of the EPOs and EPSs as outlined in this EP. | Within three months of survey completion. | NOPSEMA - submissions@nopsema.gov.au |
| Report on the conduct of the survey with whale sightings. | Within two months of activity completion. | Upload information to:<br>https://data.marinemammals.gov.au/csa<br>Text file sent to: sightingsdata@aad.gov.au |
| **EP Accepted and Activity Update** | | |
| Notification to all relevant stakeholders advising of EP acceptance and provide an update on survey commencement. | Within 10 days of the date the EP has been accepted. | All relevant stakeholders listed in the Consultation Log. |
| Notification of the establishment of the claims process, the survey timing, and the Adjustment Area | No less than 28 days before activity commencement. | Relevant commercial fishing licence holders and respective peak commercial fishing industry bodies. |
| Provision of OPEP to DTP and AMSA following EP acceptance and prior to survey commencement. | Prior to survey commencement. | Contact details listed in Consultation Log. |
| **Survey Commencement** | | |
| Notify AHO for Notice to Mariners. | At least 4 weeks prior to commencement. | AHO - datacentre@hydro.gov.au |
| Notify NOPSEMA of survey commencement. | At least 10 days prior to commencement. | NOPSEMA - submissions@nopsema.gov.au |
| Notify AMSA for Auscoast Warnings This notification will include when operations start and end, name, callsign and maritime mobile service identity (MMSI), satellite communications details (including inmarsat-c and satellite telephone numbers), area of operation, requested clearance from other vessels and any other information that may contribute to safety at sea. | At least 24-48 hours prior to survey commencement. | JRCC - rccaus@amsa.gov.au<br>Ph: 1800 641 792 or +61 2 6230 6811 |
| **Survey Cessation** | | |
| Notify AMSA to cease Auscoast Warnings | Upon vessel demobilisation. | JRCC - rccaus@amsa.gov.au<br>Ph: 1800 641 792 or +61 2 6230 6811 |
| Notify NOPSEMA with survey completion date | Within ten days of survey completion. | NOPSEMA - submissions@nopsema.gov.au |
| **End of EP** | | |
| Notification of EP completion to NOPSEMA. | End of EP operation. | NOPSEMA - submissions@nopsema.gov.au |

# 8 Ongoing Consultation

This section addresses regulatory section 22(15). Community engagement and relevant persons consultation will be ongoing post-acceptance, as well as during the planning and conduct of the activity.

Ongoing consultation remains a requirement in the presence of increased or changing environmental impacts and risks that arise before, during or after the activity.

CGG will maintain an up-to-date list of relevant persons in the consultation management system. The system is used to record when relevant persons are communicated with so that we can show when each relevant persons was provided with new information relevant to the management of the activity, and any other updates or changes that may affect their functions, interests and activities. Each relevant person has their previously established preferred method of communication which will be used in this process.

## 8.1 Specific Notifications

The following notifications will be made as part of the consultation plan:

- All relevant persons will receive:
  - a notification of the activity's commencement upon acceptance of the Environmental Plan (EP) or a minimum of two weeks before the survey, unless they have requested otherwise.
- Information about the survey, including .kmz files, 5-minute updates, and a 48-hour look-ahead, will be provided to relevant persons who have identified a need for this information.
- Relevant persons requesting 24, 48, or 72-hour look-ahead for acquisition will receive daily notifications throughout the survey duration.
- Australian Maritime Safety Authority's Joint Rescue Coordination Centre (AMSA JRCC) will be provided notice of the intention to commence the activity 48 hours prior to the activity's commencement.
- CGG will request a 'Notice to Mariners' to be issued via RAN Australian Hydrographic Service (AHS) before the survey begins.
- A webpage for commercial fishers will provide lookahead information and contact details for activity vessels
- CGG will place adverts in local papers and at local dive shops a minimum of two weeks before the survey with details of the measures in place to protect divers and information about how to gain an understanding of the SIMOPS plan.
- CGG will consult with Beach Energy if the survey design results in the presence of the vessel within 2km of the 500m petroleum safety zone around the Thylacine platform.
- CGG must give 28 days' notice to OMICC registered commercial fishers of the commencement of an activity. The notification will include information to support avoidance of the activity and information about how to make a claim.

## 8.2 Consultations

CGG will continue to promote relevant persons' self-identification throughout the life cycle of the activity. On request, CGG will meet with relevant persons on a one-on-one basis to communicate NOPSEMA assessment outcomes, gather additional feedback, and liaise with local government bodies. As per the management of knowledge process, CGG will also continue consultation with third parties to improve the environmental management.

The Otway Adjustment Protocol will be subject to review and update by Klarite Sustainable Ventures (KSV) and the members at least once in each 12-month period. Changes will be considered in

consultation with relevant fishing associations (and other stakeholders as appropriate) and subject to agreement by the titleholder members.

## 8.3 Activity Website

CGG will maintain the Regia MSS Consultation Hub website and interactive map and respond to comments within 48 hours of a comment being made.

## 8.4 Webinars

Post-acceptance of the EP, CGG will continue its practice of hosting an online webinar every two months the Environment Plan is in-force. Registration for the webinars will remain open while the Environment Plan is in-force. Members of the public may also register for the webinar series. All previous webinars will be accessible on the Regia MSS Consultation Hub and on YouTube. Similarly, there will be a monthly newsletter every month the EP is in-force.

## 8.5 Project Updates

CGG will communicate to each relevant person by sending notifications at the following key milestones or events:

- At each NOPSEMA decision.
- If the EP is accepted.
- 8 weeks prior to survey commencement.
- Immediately upon completion of the activity.
- In the event of a significant incident (e.g. level 2 fuel spill).
- If the seismic vessel is required to depart the Operational Area to avoid adverse weather (notification will be communicated by the AMSA Joint Rescue Coordination Centre as a navigational safety warning).
- If there is a change to the MSS activity scope that may affect the relevant persons interests, activities or functions.
- If a new or significant increase in potential impact or risk is identified that (after identification of additional control measures to manage those impacts or risks) may affect the relevant persons functions, interests, and activities.

All notifications will include the relevant details of the activity including the activity title, location and contact details.

## 8.6 Continual Identification of Relevant Persons

CGG will perform searches for relevant persons at least once per 12-month period and once, eight weeks prior to the commencement of the survey. There will be no searches for relevant persons after the end of the activity notification is provided to NOPSEMA.

As a result of providing activity status updates publicly, or because of a change in a person's functions, interests, and activities, CGG acknowledges that new relevant persons may reveal themselves at any time while the EP is in-force. If a new person reveals themselves the following steps will be followed:

- Establish a preferred and an alternative means of contact.
- Establish the persons functions, interests, and activities (by research or enquiry).
- If the person may be affected by the activity:
    - Provide the NOPSEMA consultation brochure.

  - Inform the person of their rights and obligations under the regulations.
  - Notify the person that they may request any information they provide to CGG can be treated as confidential and will not be published.
  - Notify the person that all records of correspondence will be maintained and may be provided to NOPSEMA as part of a proposed revision or an inspection.
- Provide the following initial information about the proposed activity.
  - Latest map of the activity.
  - The PEIRA and a link to the Consultation Hub.
  - A proposed consultation process for them.
- Enquire if any further information is required to make an informed assessment of the potential consequences of the activity on their functions, interests, or activities.
- Allow a period of 30 days for the relevant person to respond with any objections or claims about the adverse effects of the activity.
- Respond to any objections or claims about the adverse effects of the activity.
- If the person is unresponsive, make two further attempts to contact the person by the preferred and alternative means of contact. If the person remains unresponsive after these efforts, inform the person that they will be removed from the relevant persons consultation process unless they reply.

Similarly, a relevant person may be the source of new information that has resulted in a change to their functions, interests, and activities. This may in turn result in a modified or new objection or claim relevant to the activity. CGG shall assess the merits of any modified or new objections or claims in the same way as completed in the EP. If the claim has merit, where appropriate, CGG may modify the management of the activity as soon as possible. A management of change process would assess the modification to the management of the activity.

CGG will endeavour to respond to the modified or new objection or claim received while the Environment Plan is in-force within one week of receipt of the new information and the modified or new objection or claim.

CGG will undertake any resulting management of change actions as soon as practicable, but preferably within the same time. For objections and claims that do not necessitate a change to the management of the activity nor the Environment Plan, CGG will respond to the relevant person providing reasoning and supporting information (as relevant) to support CGG's conclusions within a month of receiving the new information.

# 9 Compliance with the Act, the regulations, and all other environmental legislation

## 9.1 Record Management

In accordance with Section 52, CGG will store and maintain documents or records relevant to the EP implementation for a period of five years in a way that makes retrieval reasonably practicable.

# 10 Document Control

| Version | Date of Revision | Author/Reviewer | Summary of Changes |
|---|---|---|---|
| 0.0 | 10 March 2023 | MS | Initial version |
| 0.1 | 19 March 2023 | SJ | Peer review |
| 0.2 | 23 March 2023 | LT/PR | Review by CGG |
| 0.3 | 2 April 2023 | MS | Updated following reviews |
| 1.0 | 6 April 2023 | MS | Published on Regia MSS Consultation Hub website |
| 1.1 | 20 December 2023 | HS | Updated for 2023 regulations and reviewed for consistency with environmental assessments. |
| 1.2 | 29 December 2023 | MS/SJ | Reviewed and finalised for submission. |
| 2 | 3 January 2024 | MS | Published on the consultation hub and ready for submission for public comment. |
| 3 | 11 May 2024 | MS | Review post public comment, minor changes only. |
| 4 | 28 October 2024 | MS/CT | Updated following NOPSEMA assessment |
| 5 | 16 April 2025 | MS/PR/IB/PS | Updated following NOPSEMA OMR Letter |
| 6 | 6 December | MS | Updated following NOPSEMA OMR 2 Letter |

# Annex 1 – Impact Assessment Tables

*Table B3-6 – Environmental impact assessment effect levels.*

| Effect Level | Definition |
|---|---|
| **Negligible (1)** | The impact is expected to have little or no effect on the environment or the affected species, populations, or ecosystems. The impact may be within the natural variation or background levels, or the system may have the capacity to absorb or recover from the impact without significant harm. |
| **Minor (2)** | The impact is expected to have some effect on the environment or the affected species, populations, or ecosystems, but the effect is not considered significant or long-lasting. The impact may be localized or temporary, and the system may have the capacity to recover from the impact over time. |
| **Moderate (3)** | The impact is expected to have a noticeable and potentially significant effect on the environment or the affected species, populations, or ecosystems. The impact may be more widespread or persistent than a minor effect, and the system may require longer periods of time or additional management measures to recover from the impact. |
| **Major (4)** | The impact is expected to have a significant and potentially irreversible effect on the environment or the affected species, populations, or ecosystems. The impact may result in the loss or degradation of critical habitats, the decline or loss of species or populations, or the disruption of ecosystem functions or services. The system may require extensive management measures to recover from the impact, and the recovery may be incomplete or may take many years. |
| **Catastrophic (5)** | The impact is expected to have a severe and potentially irreversible effect on the environment or the affected species, populations, or ecosystems. The impact may result in the loss of entire ecosystems or the collapse of ecological processes, with significant consequences for human health, safety, or well-being. The system may require extensive and long-term management measures to recover from the impact, and the recovery may be uncertain or impossible to achieve. |

*Table B3-7 - Environmental impact assessment uncertainty levels.*

| Uncertainty Level | Definition |
|---|---|
| **Very low (1)** | This level of uncertainty indicates that there is an extremely high degree of knowledge, understanding, or confidence in the data, models, or assumptions used in the analysis. This level of uncertainty is typically associated with very well-established scientific principles or data that have been extensively tested, validated, and replicated. |
| **Low (2)** | There is a high degree of knowledge, understanding, or confidence in the data, models, or assumptions used in the analysis. This level of uncertainty is typically associated with well-established scientific principles or data that have been extensively tested and validated. |
| **Medium (3)** | Some knowledge, understanding, or confidence in the data, models, or assumptions used in the analysis, but there are still gaps or uncertainties that need to be addressed. This level of uncertainty may require further research or data collection to reduce uncertainty. |
| **High (4)** | Limited knowledge, understanding, or confidence in the data, models, or assumptions used in the analysis. This level of uncertainty may indicate a lack of data, or a poor understanding of the system being studied. At this level there is scientific uncertainty, and the precautionary principle must be applied. |
| **Unknown (5)** | Insufficient knowledge, understanding, or data available to decide the level of uncertainty. This level of uncertainty may be associated with new or emerging scientific principles, or areas where data are scarce or difficult to obtain. The unknown uncertainty level may also be used when there are conflicting scientific opinions or when the scientific community is divided on a particular issue. At this level there is scientific uncertainty, and the precautionary principle must be applied. |

*Table B3-8 - Environmental impact evaluation matrix.*

| | Effect | | | | |
|---|---|---|---|---|---|
| **Uncertainty** | Negligible | Minor | Moderate | Major | Catastrophic |
| Very low | | | | | |
| Low | | | | | |
| Medium | | | | | |
| High | | | | | |
| Unknown | | | | | |

| **Term** | **Definition** |
|---|---|
| Low | Acceptable. The predicted levels of impact are beneath levels of perception and/or within normal bounds of variation. Good industry practice (including legislation and standards) has been applied and therefore these impacts are of an acceptable level without further reduction measures being required. |
| Medium | Acceptable. The predicted levels of impact are clearly below the pre-defined acceptable levels of impact and the mitigation and management measures in place provide sufficient confidence in the predicted effect levels. |
| High | Objectionable. The predicted levels of impact are close or like the pre-defined acceptable levels and/or there is enough uncertainty to apply the precautionary principle. |
| Very High | Unacceptable. The activity requires re-design and/or postponement or cancellation. Further studies may be required to lessen the uncertainty or reclassify the effect level. There are no additional mitigation and management measures that lower the effect. |

# Annex 2 – Risk Assessment Tables

*Table B3-9 - Environmental risk assessment levels of consequence.*

| Consequence | Definition |
|---|---|
| **Negligible (1)** | Potential harm is minor, and it may be limited to minor injuries or damage to property that can be easily repaired or replaced. The impact may be temporary or localized, and the consequences may be reversible or easily mitigated. |
| **Minor (2)** | Potential harm is moderate, and it may result in injuries or damage to property that require some level of repair or replacement. The consequences may be more widespread or longer lasting than a negligible consequence, and the consequences may require some level of mitigation or remediation. |
| **Moderate (3)** | This level of consequence indicates that the potential harm is significant, and it may result in injuries or damage to property that require extensive repairs or replacement. The consequence may be more widespread or longer lasting than a minor consequence, and the consequences may require significant mitigation or remediation efforts. |
| **Major (4)** | Potential harm is severe, and it may result in injuries or damage to property that are catastrophic or irreparable. The consequences may result in significant environmental, social, or economic harm, and the consequences may require extensive and long-term mitigation or remediation efforts. |
| **Catastrophic (5)** | Potential harm is extremely severe, and it may result in loss of life, extensive environmental damage, or long-term social or economic harm. The consequence may be irreversible or impossible to mitigate, and the consequences may have significant consequences on human health, safety, and well-being. |

*Table B3-10 - Environmental risk assessment likelihood levels.*

| Likelihood | Definition |
|---|---|
| **Rare (1)** | The event is expected to occur only in exceptional circumstances, or it may have never occurred before in similar circumstances. This level of likelihood implies that the event is highly unlikely to occur, with a probability of less than 1%. |
| **Unlikely (2)** | The event is possible but not expected to occur under normal circumstances. This level of likelihood implies that the event is not likely to occur, with a probability of between 1% and 10%. |
| **Possible (3)** | The event could occur under certain conditions, or it may have occurred before in similar circumstances. This level of likelihood implies that the event is moderately likely to occur, with a probability of between 10% and 50%. |
| **Likely (4)** | The event is expected to occur under normal circumstances, or it may have a high likelihood of occurring based on experience or data. This level of likelihood implies that the event is highly likely to occur, with a probability of between 50% and 90%. |
| **Almost Certain (5)** | The event is expected to occur in most circumstances, or it may be virtually certain to occur based on experience or data. This level of likelihood implies that the event is almost certain to occur, with a probability of greater than 90%. |

*Table B3-11 - Environmental risk evaluation matrix.*

| | Consequence | | | | |
|---|---|---|---|---|---|
| **Likelihood** | Negligible | Minor | Moderate | Major | Catastrophic |
| Rare | | | | | |
| Unlikely | | | | | |
| Possible | | | | | |
| Likely | | | | | |
| Almost Certain | | | | | |

| **Term** | **Definition** |
|---|---|
| Low | Tolerable. The predicted levels of risk are beneath levels of perception. Good industry practice (including legislation and standards) has been applied and therefore these risks are of an acceptable level without further reduction measures being required. |
| Medium | Tolerable. The predicted levels of risk are clearly below the pre-defined acceptable levels of risk and the mitigation and management measures in place provide reliable prevention to have confidence in the predicted likelihood levels. |
| High | Objectionable. The predicted levels of risk are close to or like the pre-defined acceptable levels of risk and/or the mitigation and management measures in place to prevent and respond to the event have lower levels of effectiveness such that others may disagree to the acceptability of the risk. |
| Very High | Unacceptable. The activity requires re-design and/or postponement or cancellation. Further studies may be required to lessen the uncertainty or reclassify the effect level. There are no additional mitigation and management measures that lower the effect. |

# Annex 3 - Objections and Claims raised from consultation.

| Feedback ID | Objection or Claim Summary | Titleholder Response | Event ID |
|---|---|---|---|
| **4222** | The BCR and surrounding waters has significant economic, environmental and cultural values, and supports a significant tourism industry as well as commercial and recreational fishing, as a key biodiversity area, it is of incalculable value to coastal communities and the state. | The titleholder is aware of the areas unique features and values having undertaken a comprehensive engagement process. The titleholder has ensured appropriate measures have been put in place so there are no long term affects from the activity. (Event ID 4092). | 4091 |
| **4499** | GMTOAC notes that the April 2025 EP allows CGG a 90-day continuous window to complete the survey, with a maximum of 60 days of active seismic acquisition. GMTOAC claims that this limited timeframe will not allow CGG to meaningfully implement ongoing review and improvement measures intended to reduce harm to Karntubul. | Appendix G1 outlines that the Environment Officer is responsible for recording, assessing, and addressing environmental incidents within required timeframes, implementing corrective actions, and ensuring continuous compliance through daily reports, weekly audits, and incident reviews. Non-compliance triggers immediate inspection and corrective action, and objections or claims are assessed within 48 hours, with any necessary protections implemented promptly. This framework also illustrates how the proposed CVA project (Event ID EVT337), including the Sea Country Protection Plan, could involve Gunditjmara and supports CGG's position that the CVA should extend before, during, and after the activity. | EVT352 |
| **4501** | GMTOAC objects that the EP sets out CGG's own "Defined Acceptable Levels" for cultural impacts arising from underwater sound on marine mammals, concluding that any such impacts would be short-term, temporary, and recoverable. GMTOAC and Gunditjmara reject this assessment, emphasising that CGG did not properly consult them on what levels of harm to cultural values, including impacts to culturally significant species such as Karntubul, would be acceptable. As these standards were developed unilaterally, GMTOAC and Gunditjmara do not accept CGG's conclusions regarding cultural impacts. | PROPOSED RESPONSE SUMMARY - CGG applied a comprehensive, transparent, ISO 31000:2009-aligned risk-assessment methodology, drawing on peer-reviewed literature and approaches accepted in numerous Environment Plans, to determine acceptable levels of environmental impacts and risks on both tangible and intangible values. Environmental aspects were systematically identified, impact severity and duration were assessed, and mitigation measures were evaluated using evidence and consultation. Acceptable impact levels (Appendix B1) and the assessment method (Appendix B9) were publicly released in May 2023. CGG concluded that impacts and risks are acceptable because risks were fully identified, lower-level risks were eliminated or | EVT352 |

| Feedback ID | Objection or Claim Summary | Titleholder Response | Event ID |
|---|---|---|---|
| | | controlled, major risks were examined in detail, activity limitations constrain operations, predictions were assessed against defined acceptable levels, uncertainty was considered, and the activity complies with the EPBC Act and ecologically sustainable development principles.<br>CGG also relied on relevant sources, including peer-reviewed studies and UNESCO guidance describing the deep interdependence of tangible and intangible values, to inform acceptable levels where Traditional Owner input has not yet been provided. GMTOAC and Gunditjmara have been invited to contribute to cultural-value management, and the EP includes an Implementation Strategy embedding a Sea Country Protection Plan to support ongoing engagement and adaptive management. The Regulations (Regs 17–18) further ensure that any significant new cultural or environmental information must trigger revision of the EP. CGG remains ready to continue collaboration with GMTOAC and Gunditjmara throughout the activity. | |