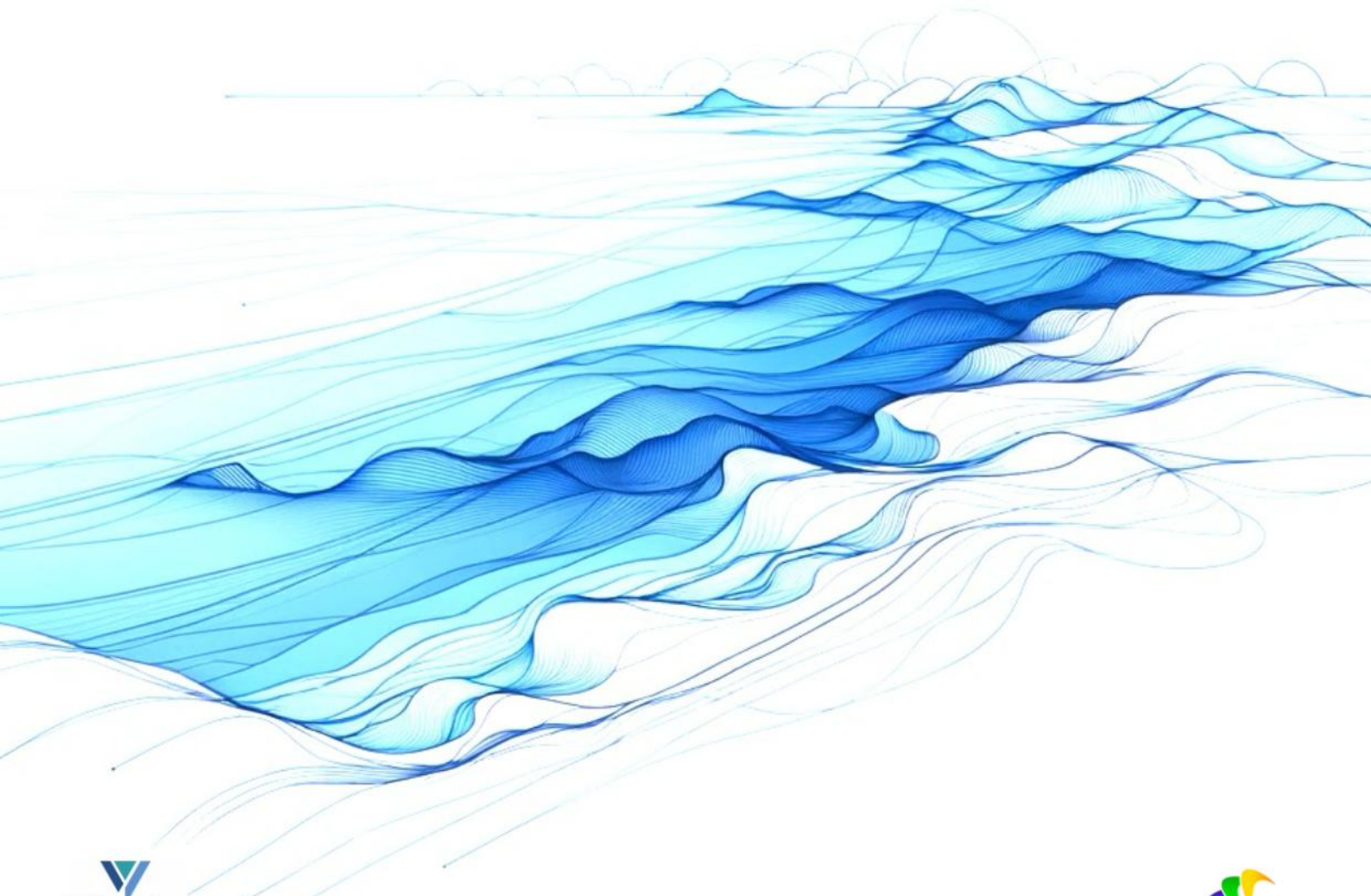
REGIA
Marine Seismic Survey

Impact Assessment
Physical Presence

Appendix E1: REG-EP-020-E1

Rev 4

December 2025



Klarite

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1 Introduction

Physical presence of the seismic survey vessel and support vessels was identified through the Preliminary Environmental Impact and Risk Assessment (PEIRA) (Appendix B4) as an environmental aspect needing further assessment. Hence this document presents a detailed examination of **Physical Presence**, as will typically be produced during the proposed Regia Marine Seismic Survey (**Regia MSS**), and its interaction with the environmental receptor we are collectively calling **Other Marine Users.**

This document also uses information in three preceding studies that should be understood before reading this report.

1. PEIRA.
2. Commercial Fisheries Analysis Report (Appendix B6).
3. Cultural Heritage Assessment Report (Appendix B10).

1.1 Purpose and Scope

The purpose of this document is to assess all acceptable sources of information to provide clear outcomes around levels-of-impact, and any associated mitigation and management measures that may be needed.

This assessment is the second stage of the environmental assessment. Its purpose is to rank the impact according to the criteria set out in the Environmental Assessment Process found in Appendix B3. The purpose of this stage of the assessment is to demonstrate that the impact can be managed to an acceptable level through the adoption of mitigation measures and the setting of an appropriate environmental performance outcome.

The measures adopted because of consultation and because of the assessment will be carried through to the ALARP assessment which occurs in stage three of the overall assessment process. Recommendations will be made if there is any further assessment required in the third stage of the assessment.

1.2 Consultation in Preparation of the EP

This document was first published in draft form to the Document Library of the Regia MSS Consultation Hub on 11 September 2023. This was done to acknowledge that the final full Environment Plan (**EP**) can be a large document that is difficult for readers to digest in the 30-day public comment period. As such, the public and relevant persons were invited to comment on the document with an explicit request for readers to provide feedback on:

- The accuracy of the described environment that may be affected.
- Any omissions of environmental values and sensitivities relevant to the environmental aspect.
- Any errors or omissions of scientific/peer reviewed literature that should be considered.
- Any errors or omissions of relevant legislation or documents of standing that should be considered.
- Any further mitigation or management measures that should be considered.

Up to 22 December 2023, there were no specific comments received on the content of the document.

1.3 Modifications Arising from Further Assessment

To ensure this environmental assessment remains contemporary, accurate, and reflects feedback from the regulator and relevant persons, this document will be updated from time-to-time. In particular, the CGG environmental assessment process requires consideration of whether further assessment was needed to verify, or dive deeper into a topic, to further improve the predictive quality of the assessment. When this has occurred, reference to such changes will be communicated in the Recommendation section and identified at relevant points in the assessment.

2 Aspect – Physical Presence

2.1 How the Aspect Occurs

The physical presence of the survey vessel with the towed sound source and streamers and the support vessels operating in marine waters may interfere with other marine users' activities.

The aspect does not cover the risk of a vessel collision with other marine users as this is assessed in the Accidental Release of Fuel section.

2.2 Extent and Duration of the Aspect

Duration: 90 days

Extent: Operational Area

The extent of the area where the physical presence of vessels and towed equipment will occur is within the Operational Area and the impact (of interference with other marine user's activities) could occur while the activity is undertaken.

3 Cause-Effect Pathway

The PEIRA (Appendix B4) identified a cause-effect pathway for the physical presence of vessels and towed equipment for the following environmental components and their social, cultural, and economic features:

- Commercial fishing and aquaculture
- People and communities
- Marine industries
- Diving
- Marine tourism
- Recreational fishing

Via the relevant person consultation process the Department of Defence confirmed the Operational Area is located outside of any Defence Training Areas and restricted airspace thus interference with defence activities is not assessed further.

Based on relevant person consultation, an activity limitation has been put in place to have no vessel movement within 4 nautical miles of the coast, except in case of emergency**,** to reduce impacts to commercial and recreational fishers, surfers, swimmers, and coastal users. No impacts are therefore predicted from the physical presence of vessels and towed equipment to swimmers and coastal users, and they are not assessed further.

The limited manoeuvrability of the seismic survey vessel while towing the source array and streamers means that other marine users in the same water space will have to avoid the seismic survey vessel and towed equipment while in operation. Commercial fishing vessels may also be asked to remove fishing gear such as traps and lines to avoid interaction with the seismic survey vessel and towed equipment.

4 Description of the Existing Environment that May be Affected by the Activity

As detailed in the Section 2.2, the Operational Area has been adopted as the extent of the area where other marine users' activities may be affected by the physical presence of vessels and towed equipment associated with the Regia MSS.

4.1 Commercial Fishing and Aquaculture

In August 2023 a review of commercial fisheries was undertaken to identify Commonwealth and State (Victorian, Tasmanian, and South Australian) fisheries that fish or potentially fish within the Activity Planning Area and is available in Appendix B6: Commercial Fisheries Analysis Report. In March 2025, a further review was undertaken of the commercial fisheries to include the 2023 Commonwealth fishery data and the updated Operational Area. The outcomes of this latest review are detailed in Table E1-1.

The review identified the following commercial fisheries that have catch-effort, and hence are likely to be fish within the Operational Area:

- Commonwealth
    - Bass Strait Central Zone Scallop Fishery
    - Eastern Tuna and Billfish Fishery
    - Small Pelagic Fishery
    - Southern and Eastern Scalefish and Shark Fishery following sectors:
        - Commonwealth Trawl Sector – Danish Siene
        - Commonwealth Trawl Sector – Otter-board
        - Shark Gillnet Sub-sector
        - Shark Hook Sub-Sector
    - Southern Squid Jig Fishery
    - Western Tuna and Billfish Fishery
- Victorian:
    - Giant Crab
    - Multi-species Ocean
    - Octopus
    - Southern Rock Lobster
    - Wrasse
- Tasmania: No fisheries identified.

A summary of these fisheries is provided in Table E1-1.

For the Commonwealth fisheries ABARES Annual Fishery Status Reports and map data has been used to determine activity within the Operational Area. ABARES Annual Fishery Status Reports Map Data are digital representations of the two thematic components of the maps in the ABARES Fishery Status Reports: relative fishing intensity and the maximum area of waters fished. In Feedback ID 1237, AFMA confirmed the reliability of the ABARES data, stating it uses logbook and other AFMA collected data.

Relative fishing intensity shows areas where five or more fishing vessels operated, and the relative effort expended or the catch. Maximum area fished shows the total area where fishing occurred at a resolution of one degree (approximately 111 x 111 km) the relative effort expended, or the catch is not publicly available for the maximum area fished due to confidentiality associated with four or less vessel.

For the Victorian fisheries, data (2011-2022) from the Victorian Fishing Authority has been used to determine activity within the Operational Area.

Table E1-1 - Summary of Level of Fishing Activity within the Operational Area

Fishery	Activity within the Operational Area	Activity Level
Commonwealth Fisheries		
Bass Strait Central Zone Scallop Fishery (BSCZSF)	The Operational Area overlaps a small area (0.29%) of the fishery where there have been less than 5 fishers during 2010 to 2023. This overlap is due to the grid size used for reporting (111 km × 111 km) as historical and current scallop beds are to the east and north of King Island outside of the Operational Area. See Appendix B12 MAP-REG-EPM-097 and Annex 3 for overlap calculation. As detailed in the Bass Strait and Central Zone Scallop Fishery - 2024 Survey (Koopman and Knuckey 2024) scallop fishing only occurs within commercially viable scallop beds. All beds surveyed since 2015 and new beds in 2024 are to the east and north of King Island. Based on this the likely activity level for the BSCZSF within the Operational Area is assessed as none.	None
Eastern Tuna and Billfish Fishery (ETBF)	The Operational Area overlaps the fishery (0.22%) where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-126 and Annex 3 for overlap calculation. Fishery effort is typically concentrated along the NSW coast and southern Queensland coast with some fishing effort in Victoria. See Appendix B12 MAP-REG-EPM-126. The number of active longline vessels in the fishery has decreased substantially in the past 2 decades from around 152 in 1999 to 34 in 2023 (Butler et al. 2024). Primary landing ports are Bermagui, Coffs Harbour and Ulladulla (New South Wales); Cairns, Mooloolaba and Southport (Queensland) (Butler et al. 2024). There is a 12-month season. One fishing reporting grid that the Operational Area overlaps has been fished in 2023 with no other activity within the Operational Area in the last 6 years (2018 – 2023). The grid fished in 2023 is the closest to the SA border and is overlapped by a small area of the Operational Area (See Appendix B12 MAP-REG-EPM-098). Based on there has only been fishing in one grid in one year in the last 6 years within the Operational Area, no landing ports in Victoria and fishing effort is concentration off the east coast of Australia, the likely activity level for the ETBF within the Operational Area is assessed as low.	Low
Small Pelagic Fishery (Western sub-area) (SPF)	The Operational Area overlaps a small area of the fishery (0.12%) where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-127, Appendix B12 MAP-REG-EPM-099 and Annex 3 for overlap calculation. In 2023, there were 8 boats active in the fishery (Butler et al. 2024). Midwater trawling has been the primary fishing method in the fishery in more recent years and most effort now occurs off the south coast of New South Wales (Butler et al. 2024). Primary landing ports are Eden and Ulladulla (New South Wales) (Butler et al. 2024). There is a 12-month season. Based on the last year there was active fishing in the fishing reporting grid that overlaps the Operational Area was 2015, no landing ports in Victoria and fishing effort is concentration off the south coast of NSW, the likely activity level for the WTBF within the Operational Area is assessed as low.	Low

Fishery	Activity within the Operational Area	Activity Level
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Commonwealth Trawl Sector, Danish Seine Sub-sector (SCDS)	The Operational Area overlaps the fishery (2.32%) where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-132, Appendix B12 MAP-REG-EPM-104 and Annex 3 for overlap calculation. Danish-seine effort has been slowly declining since 2019. In 2023, there were 18 vessels active in the fishery (Butler et al. 2024). Primary landing ports are Eden, Sydney and Ulladulla (New South Wales); Hobart (Tasmania); Lakes Entrance and Portland (Victoria) (Butler et al. 2024). There is a 12-month season. Though only four or less fishers have fished within the Operational Area the relative fishing intensity is not known as it is confidential where there are less than 5 fishers. As the landing port of Portland is within the Otway area (west of King Island to the Vic/SA border) and the relative fishing intensity within the Operational Area is not known the likely activity level for the SCDS within the Operational Area is assessed as high.	High
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Commonwealth Trawl Sector (SCTR)	The Operational Area overlaps the fishery where there have been low, medium and high levels of fishing intensity during 2010 to 2023. See Appendix B12 MAP-REG-EPM-131 and Appendix B12 MAP-REG-EPM-103. The CTS otter-board level of effort has been slowly declining since 2017 and represents around half the effort recorded in the early 2000s. In 2023, there were 24 vessels with 251 fishing days down from 2022 where there were 30 vessels with 380 fishing days (Butler et al. 2024). Primary landing ports are Eden, Sydney and Ulladulla (New South Wales); Hobart (Tasmania); Lakes Entrance and Portland (Victoria) (Butler et al. 2024). There is a 12-month season. Based on the Operational Area overlaps where there has been low, medium and high level of fishing intensity and the landing port of Portland is within the Otway area (west of King Island to the Vic/SA border) the likely activity level for the SCTR within the Operational Area is assessed as high.	High
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Shark Hook Sub-sector (SSKK)	The Operational Area overlaps the fishery where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-129 and Appendix B12 MAP-REG-EPM-101. The SSKK primarily targets four shark species (elephantfish, gummy shark, sawsharks and school sharks) using demersal longlines with most fishing occurring off South Australia (Butler et al. 2024). Spatial closures that have been progressively implemented since 2003 have resulted in an increase in hook effort to replace gillnet effort off South Australia (Butler et al. 2024). In 2023, there were 68 active an increase from 57 vessels in 2022 (Butler et al. 2024). Primary landing ports are Lakes Entrance, Port Welshpool, San Remo (Victoria); Adelaide, Port Lincoln, Robe (South Australia); Devonport, Hobart (Tasmania) (Butler et al. 2024). There is a 12-month season. Based on most fishing using demersal longlines is undertaken off South Australia and there are no landing ports in the Otway area (west of King Island to the Vic/SA border) the likely activity level for the SSKK within the Operational Area is assessed as low	Low

Fishery	Activity within the Operational Area	Activity Level
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Shark Gillnet Sub-sector (SSKN)	The Operational Area overlaps the fishery where there has been a low, medium and high levels of fishing intensity during 2010 to 2023. See Appendix B12 MAP-REG-EPM-130 and Appendix B12 MAP-REG-EPM-102. The SSKN primarily targets four shark species (elephantfish, gummy shark, sawsharks and school sharks) using demersal gillnets. Spatial closures that have been progressively implemented since 2003 have resulted in gillnet effort being concentrated in Bass Strait (Butler et al. 2024). In 2023, there were 31 active vessels and in 2022 there were 30 active vessels (Butler et al. 2024). Primary landing ports are Lakes Entrance, Port Welshpool, San Remo (Victoria); Adelaide, Port Lincoln, Robe (South Australia); Devonport, Hobart (Tasmania) (Butler et al. 2024). There is a 12-month season. Though there are no primary landing ports in the Otway area (west of King Island to the Vic/SA border) there has been recorded low, medium and high levels of fishing intensity within the Operational Area, thus the likely activity level for the SSKN within the Operational Area is assessed as high.	High
Southern and Eastern Scalefish and Shark Fishery (SESSF) -Scalefish Hook Sector (SSCK)	The Operational Area overlaps the fishery where there has been a low level of fishing intensity and where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-133 and Appendix B12 MAP-REG-EPM-105. The SSCK is a multispecies fishery, targeting a variety of fish and shark species that uses a variety of longline and dropline hook fishing methods (Butler et al. 2024). In 2023, there were 13 active scalefish hook vessels, a decrease from 2022 when there were 21 active vessels (Butler et al. 2024). Primary landing ports are Eden, Sydney and Ulladulla (New South Wales); Hobart (Tasmania); Lakes Entrance and Portland (Victoria) (Butler et al. 2024). There is a 12-month season. Though a low level of fishing intensity has been recorded in the Operational Area, relative fishing intensity is not known as it is confidential where there are less than 5 fishers. As the landing port of Portland is within the Otway area (west of King Island to the Vic/SA border) and the relative fishing intensity within the Operational Area ranges from not known to low the likely activity level for the SCDS within the Operational Area is assessed as high.	High
Southern Squid Jig Fishery (SSJF)	The Operational Area overlaps the fishery where there have been low, medium and high levels of fishing intensity during 2010 to 2023. See Appendix B12 MAP-REG-EPM-134 and Appendix B12 MAP-REG-EMP-106. The SSJF is a single-method (jigging), single-species fishery, targeting Gould's squid. Australian jig vessels typically operate at night in continental-shelf waters between depths of 60 m and 120 m (Butler et al. 2024). In 2023, there were 8 active jig vessels, an increase from 2022 when there were 6 active jig vessels (Butler et al. 2024). Primary landing ports are Portland and Apollo Bay (Victoria), Port Fairy, Queenscliff, Devonport and Triabunna (Tasmania). There is a 12-month season. Based on the Operational Area overlaps where there has been low, medium and high level of fishing intensity and the landing ports of Portland and Apollo Bay are within the Otway area (west of King Island to the Vic/SA border) the likely activity level for the SSJF within the Operational Area is assessed as high.	High

Fishery	Activity within the Operational Area	Activity Level
Western Tuna and Billfish Fishery (WTBF)	The Operational Area overlaps a small area (0.04%) of the fishery where there have been less than 5 fishers during 2010 to 2023. See Appendix B12 MAP-REG-EPM-138, Appendix B12 MAP-REG-EPM-108 and Annex 3 for overlap calculation. In recent years, fishing effort has concentrated off south-west Western Australia, with occasional activity off South Australia (Butler et al. 2024). See Appendix B12 MAP-REG-EPM-138. Effort in the WTBF was relatively low (<20 vessels) from the mid-1980s to the mid-1990s. Effort increased in the late 1990s, peaking at 50 active vessels in 2000, but then declined rapidly. Since 2005, fewer than 5 vessels have been active in the fishery each year. (Butler et al. 2024). Primary landing ports are Fremantle and Geraldton (Western Australia). Based on the last year there was active fishing in the one fishing reporting grid that overlaps the Operational Area was 2014, no landing ports in Victoria and fishing effort is concentration off south-west Australia, the likely activity level for the WTBF within the Operational Area is assessed as low.	Low
Victorian Fisheries		
Abalone Fishery	The Abalone Fishery operates along most of the Victorian shoreline, generally to 30 m depth where abalone are harvested by divers (VFA 2025). This area is outside the Operational Area. See Appendix B12 MAP-REG-EPM-136.	None
Giant Crab Fishery	Giant crabs are fished commercially in western Victoria. The fishery is a small quota managed fishery that is closely linked with the Rock Lobster Fishery. The majority of vessels are used primarily for rock lobster fishing with giant crab taken as by-product (VFA 2025a). Giant crabs inhabit the continental slope at approximately 200 m depth and are most abundant along the narrow band of the shelf edge (VFA 2025a). Closed seasons are: • Male: 15 September to 15 November to protect males during moult. • Female: 1 June to 15 November to protect females while breeding and in berry (with eggs attached). During 2011 to 2022 the maximum number of vessels that fished in a year within the Operational Area was three and the maximum days fished in a year was 28. See Appendix B12 MAP-REG-EPM-110 and Appendix B12 MAP-REG-EPM-096. Based on the closed seasons, giant crab fishing will only overlap with the seismic survey for 15 days in the September and November period noting that the survey operations are for up to 90 days. In addition, up to 3 vessels may be present during this time thus the likely activity level for the giant crab fishery within the Operational Area is assessed as low.	Low

Fishery	Activity within the Operational Area	Activity Level
Multispecies Ocean Fisheries – Ocean General	The wrasse, inshore trawl, southern rock lobster and giant crab fisheries are able to catch gummy shark and school sharks as part of their fishery. Snapper is caught using lines, nets and haul seine. Over 90% of the catch is from Port Phillip Bay, and around 5% from coastal waters. During 2011 to 2022 the maximum number of vessels that fished in a year within the Operational Area was three and the maximum days fished in a year was 16. See Appendix B12 MAP-REG-EPM-115 and Appendix B12 MAP-REG-EPM-114. Based on the low number of fishing vessels annually (3 vessels) and fishing days (maximum 16 days) within the Operational Area, the likely activity level for the Multispecies Ocean Fisheries – Ocean General fishery within the Operational Area is assessed as low.	Low
Octopus Fishery	Victoria's Octopus (Eastern Zone) Fishery harvests mainly pale octopus in East Gippsland using purpose-built unbaited traps. The fishery may also catch Māori octopus and gloomy octopus. The fishery commenced on 1 August 2020 (VFA 2025b). The Operational Area is within the Western Octopus Zone which is less established and is being managed by the VFA through exploratory, temporary permits (VFA 2025b). During 2020 to 2022 the maximum number of vessels that fished in a year within the Operational Area was one and the maximum days fished in a year was one. See Appendix B12 MAP-REG-EPM-119 and Appendix B12 MAP-REG-EPM-118. Based on the low number of fishing vessels annually (1 vessel) and fishing days (maximum 1 day) within the Operational Area, the likely activity level for the Octopus Fishery within the Operational Area is assessed as low.	Low
Rock Lobster Fishery	The Rock Lobster Fishery is Victoria's most valuable fishery and is based on the southern rock lobster (*Jasus edwardsii*). The fishery is quota managed, with a total allowable commercial catch set annually after the status of the stock has been assessed. There are two commercial zones in the fishery that operate along the entire coastline of Victoria (VFA 2025c). The Operational Area overlaps the Portland Region within the Western Zone of the fishery. Fishing for rock lobsters is prohibited during closed seasons: • Female rock lobsters are from 1 June to 15 November and is designed to protect females in berry (with eggs attached) during the spawning period. • Male rock lobsters are from 15 September to 15 November and is designed to protect males during the moulting period when soft shells increase their vulnerability. During 2011 to 2022 the maximum number of vessels that fished in a year within the Operational Area was nine and the maximum days fished in a year was 212. See Appendix B12 MAP-REG-EPM-111 and Appendix B12 MAP-REG-EPM-095. Based on the closed seasons, rock lobster fishing will only overlap with the seismic survey during for 15 days in September and November, and in December noting that the survey operations are for up to 90 days.. Between 1 to 9 vessels may be present during this time and the maximum days fished in a year ranged from 2 to 212 (See Appendix B12 MAP-REG-EPM-095), thus the likely activity level for the rock lobster fishery within the Operational Area is assessed as high.	High

Fishery	Activity within the Operational Area	Activity Level
Wrasse (Ocean) Fishery	The fishery extends along the entire length of the Victorian coastline and out to 20 nm offshore, except for marine reserves (VFA 2025d). Most wrasse is harvested by hook and line, although commercial rock lobster fishers who also hold a commercial wrasse licences can keep those fish that they catch in their rock lobster pots (VFA 2025d). There are currently 22 licences (VFA 2025d). Wrasse inhabit depths up to 160 m, whereas fishers mostly operate in depths shallower than 30 m to reduce their losses due to barotrauma, where the swim bladder expands and damages the fish as it is hauled to the surface (VFA 2025d). The Operational Area overlaps a small proportion of three fishing blocks where during 2011 – 2022 the maximum number of vessels that fished in a year within the Operational Area was four and the maximum days fished in a year was 102 (See Appendix B12 MAP-REG-EPM-123 and Appendix B12 MAP-REG-EPM-122. Based on fishers mostly operate in depths shallower than 30 m which is outside the Operational Area (See Appendix B12 MAP-REG-EPM-136) and the small area of overlap (6.26%) between the fishery area between Port Campbell and just past Portland and the Operational Area (See Appendix B12 MAP-REG-EPM-122 and Annex 3 for overlap calculation) the likely activity level for the wrasse fishery is assessed as low..	Low

4.2 Offshore Energy

There are offshore energy providers within the Operational Area that could be impacted by the physical presence of the survey vessel and towed equipment. Within the Operational Area is the Beach Energy Otway Development consisting of subsea infrastructure and the Thylacine-A unmanned platform and the Cooper Energy Casino Henry Netherby Development consisting of subsea infrastructure (Appendix B12 MAP-REG-EPM-082). During the Regia MSS design envelope (16th September 2025 to 31 December 2028) there is the potential for exploration and development activities such as infrastructure inspection, maintenance and repairs campaigns, seabed surveys, seismic surveys, drilling, and infrastructure installation to be undertaken with vessels and drill rigs to support the ongoing energy supply of gas and potentially renewables within the Otway Basin. In September 2024 the Spinifex offshore wind farm was granted a preliminary feasibility licence, subject to further consultation with First Nations groups. Once a full feasibility licence is granted, they will be able to undertake detailed environmental and technical studies within their project areas which overlaps the Operational Area.

4.3 Commercial Shipping

There are commercial shipping companies transiting adjacent to and within the Operational Area that could be impacted by the physical presence of the survey vessel and towed equipment. The Southeast Marine Region is one of the busiest shipping regions in Australia and Bass Strait is one of Australia's busiest shipping routes. Commercial vessels use the route when transiting between ports on the east, south and west coasts of Australia, and there are regular passenger and cargo services between mainland Australia and Tasmania. Ports Australia provide statistics for port operations throughout Australia's main commercial ports. Based on the latest information (2021) the majority of commercial shipping traffic transiting to and from Victorian ports were container (3,682), general cargo (2,663), bulk liquid carriers (2,019), dry bulk (1,715), car carrier (1,342), bulk gas (220), other cargo (47) and livestock (9).

4.4 Marine Tourism

No areas of marine tourism were identified within the Operational Area. Areas where marine tourism occurs such as Deen Maar (Lady Julia Percy Island), Australian Marine Parks, Victorian Marine Parks, and Sanctuaries are outside of the Operational Area.

4.5 Recreational Fishing

Recreational fishing from vessels including fishing tour operators, may occur within the Operational Area.

Several fishing tour operators operate from coastal towns including Port Fairy, Warrnambool, Portland, and Port Campbell that fish in offshore waters for species such as Blue Fin Tuna, Shark (Gummy, School and Mako), Yellowtail Kingfish and reef species including Snapper, Morwong, Nannygai.

From relevant person consultation undertaken during preparation of the EP, only a single fishing tour operator was identified as occurring within the Operational Area.

4.6 Defence Activities and UXOs

During consultation, the Department of Defence (DoD) confirmed that the Operational Area was located outside of any Defence Training Areas and restricted airspace, therefore no impact on defence activities from the Regia MSS is expected, as such this will not be assessed further.

The Department of Defence also advised that unexploded ordnance (UXO) may be present in the sea floor and issued the following disclaimers:

a. all activities in the area are conducted at its own risk; and

b. the Commonwealth of Australia, represented by the Department of Defence, takes no responsibility for:

i. reporting the location and type of UXO that may be in the areas;

ii. identifying or removing any UXO from these areas; and

iii. any loss or damage suffered or incurred by Regia MSS or any third party arising out of, or directly related to, UXO in the area.

(Event ID 920, Feedback IDs 1522 – 1526).

As per Figure E1-1, a search of the Department of Defence's UXO map shows the following overlaps:

- Survey Acquisition Area – none
- Active Source Area – overlap with 1052 King Island, this site was used during 1954 as an Air-to-Air Firing Range and is UXO category *'Slight Potential'*
- Operational Area - overlap with 1052 King Island, this site was used during 1954 as an Air-to-Air Firing Range and is UXO category *'Slight Potential'* and SDG110 Sea Dumping – Bass Strait, this site is an area used for the dumping at sea of ordnance and other items. This site was used for the dumping at sea of ammunition including 2331 boxes of detonators and 144 boxes of explosives and is UXO category *'Other Sea Dumping Sites'*.

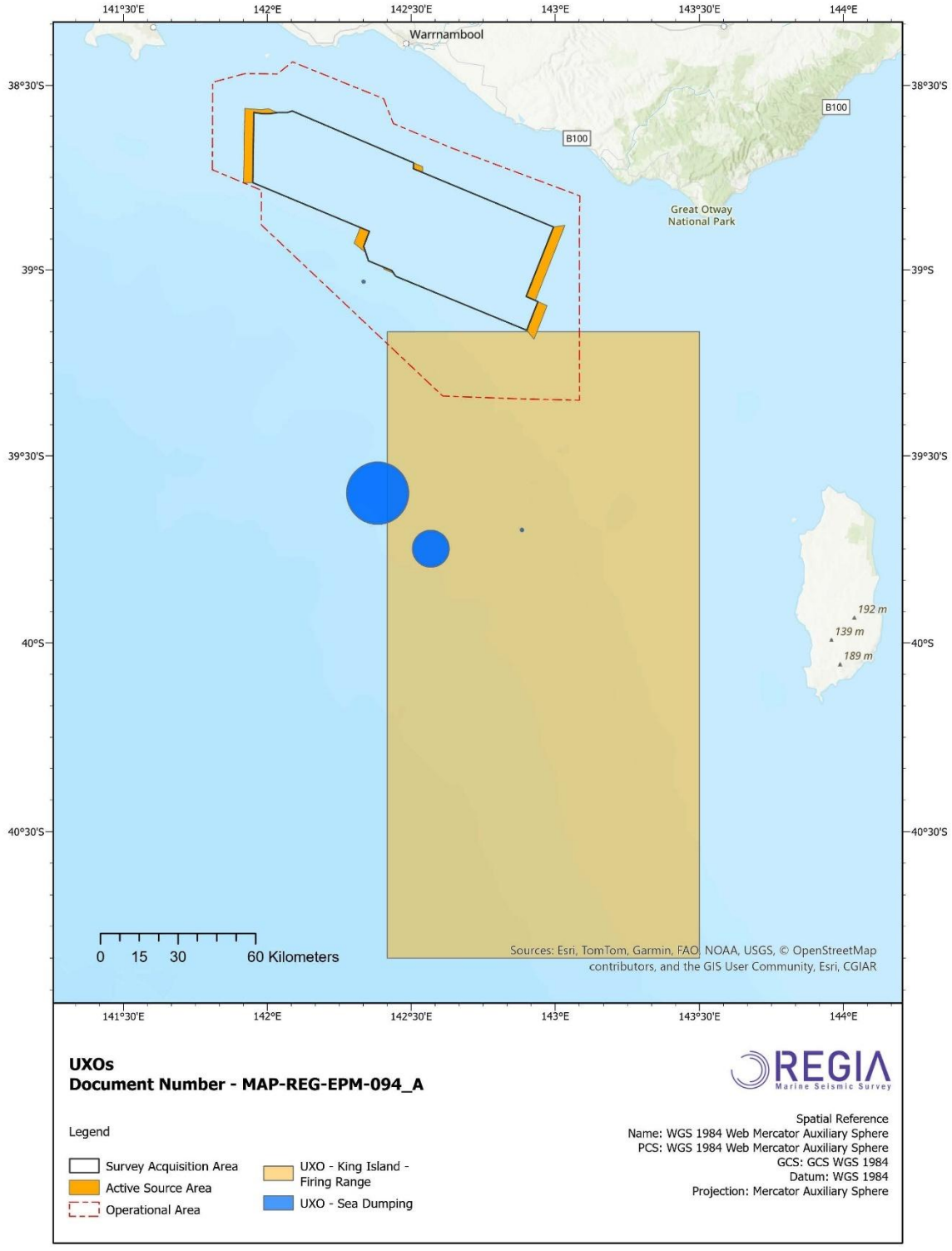


Figure E1-1 – UXOs within the Operational Area

4.7 People and Communities

4.7.1 Social and economic features

During consultation, as presented in Annex 2, objections and claims were raised regarding concerns of impacts on the local economy and environment, including commercial and recreational fishing and tourism. Commercial fishing and aquaculture, Marine Tourism and Recreational Fishing are described above in sections 4.1, 4.4 and 4.5, respectively.

4.7.2 Cultural features

Biosis Pty Ltd (**Biosis**) was commissioned by ConocoPhillips to undertake a cultural heritage desktop assessment for proposed resource exploration in Bass Strait. ConocoPhillips and Biosis gave permission for CGG to utilise this report given the overlap of the study area with the Regia MSS. The report is provided as part of this EP at Appendix B10, and a short summary is included in this document.

The purpose of the report was to explore cultural heritage and cultural heritage landscapes to understand Country, and Sea Country within and surrounding the project area, to provide the project with a grounding in Aboriginal cultural heritage. The report describes the known cultural environment, include a brief ethnohistory and history, and detailed results of register searches.

The study area includes the proposed permit areas (the location of the exploration zone(s)), where the survey is planned to occur. In general, the permit areas are located south of Port Fairy and the Great Otway National Park, and west of King Island. The study area consists of a large geographical area which did not identify any specific physical indigenous cultural features of the benthic environment. As there is no benthic disturbance pathway and no physical cultural values identified in the Operational Area the physical effect to indigenous features of the benthic environment are not assessed further.

Although Native Title has not been identified to occur within the Operational Area, it is considered possible that there may be interests and rights, and cultural values and sensitivities associated with Eastern Maar and Gunditjmara Native Title determinations (Appendix B12 MAP-REG-EPM-076) adjacent to the Operational Area including the currently under consultation Nyamat Mirring (GMTOAC, 2023).. Native title rights and interests include the non-exclusive rights to access, enter and remain on the land and waters, to camp on areas above the high-water mark, to use and enjoy the land and waters, to protect culturally important places, and to take resources from the land and waters. Deen Maar, also known as Lady Percy Island, is a culturally significant site for both the Gunditjmara and Eastern Maar. For the Gunditjmara people, Native Title also includes culturally significant sites such as the 'Convincing Ground' (Appendix F3, Section 3.16.1). In addition, Wadawurrung and Bunurong Registered Aboriginal Parties coastal areas have overlap with the northeastern extent of the Environmental Planning Area, may be affected (Appendix B12 MAP-REG-EPM-091).

4.7.2.1 Sea Country Values

There is the potential for marine ecosystems to include intangible cultural features. This is one aspect of the broader concept of "sea country", which can be defined as the area of sea over which an Indigenous group has interests, cultural value, connection and use. Country refers to more than just a geographical area: it is shorthand for all the values, places, resources, stories and cultural obligations associated with that geographical area. (Smyth, 2007). It necessarily follows that an impact to marine ecosystems has the potential to impact cultural features where the impact is detectable within Sea Country — the seascape which Traditional Custodians view, interact with or hold knowledge of.

The link between environmental protection and cultural heritage protection is illustrated in the Australian Government's Indigenous Protected Areas Program. The Indigenous Protected Areas program provides for "areas of land and sea managed by Indigenous groups as protected areas for biodiversity conservation…IPAs deliver environmental benefits…Managing IPAs also helps Indigenous communities protect the cultural values of their country for future generations…" (IPA Program Evaluation 2024).

Cultural features of coastal areas may include marine species (e.g., whales) that may travel many thousands of kilometres through areas with similar cultural values to multiple Indigenous language groups. For example, Southern Right Whales are a highly mobile migratory species that can travel

thousands of kms between habitats used for these essential life functions (Kenney, 2018) passing Indigenous language groups along the southern and eastern coasts of Australia.

Through consultation and online research, information about cultural features of the environment have been identified, as captured in Appendix F3, section 3.,16. This includes:

- Sacred Sea Country Songlines.
- Sacred Burial grounds of Deen Maar.
- Point Nepean and Mornington Peninsula area of high cultural significance.
- Dreaming and creation stories associated with coast area and sea.
- Connections with the sea and its resources.
- Koontapool (Southern Right Whale):
  - The Gunditjmara's deep connection to Koontapool as a carrier of life and knowledge is emphasized, with the whale being seen as kin, and their survival intertwined with that of the people for millennia.
  - Welcoming Koontapool back to the familiar waters of Sea Country was a significant event for the community, marked by ancient rituals and the first public acknowledgment of this homecoming by the Gunditjmara people.
- Wuulok (Blue Whale).
- Koorn Moorn (Seals).
- Sea Lions.
- Kooyang Short Finned Eels.
- Coastal resources, such as shell middens
- Important birthing and calving grounds at Logan's beach whale nursey.
- A connection to the Koontapool and Sea Country kin.

The scope of advice sought during consultation and research about Sea Country was not limited by reference to any boundaries or limits. These values are of high significance for First Nations groups, including the Gunditjmara, along with the importance of sharing cultural tales in modern times and highlighting the importance of preserving these stories for future generations. CGG also heard about the importance of respecting the past, protecting the present, and ensuring the future.

An impact to marine ecosystems has the potential to impact cultural values where the impact is detectable within Sea Country. CGG considers that impact to cultural values of marine species will be adequately managed in Sea Country, and therefore management of the environmental values will preserve the cultural values of environmental receptors. Management of impacts other than physical presence are found in Appendix E2 to E9.

5 Relevant Legislative and Other Requirements

CGG has considered relevant legislative requirements, that apply to the physical presence of vessels and towed equipment (see Appendix B2). Measures that will be adopted to demonstrate how these requirements will be meet are as follows:

- The CGG Marine Assurance System ensure compliance of contract vessels with Navigation Act, MARPOL, COLREGS and Marine Orders.
- The Communications Management System ensures that survey communications will minimise interference with the activities of the other marine users. This includes mandatory notification of the Australian Hydrographic Service who issue Notices to Mariners.
- An On-Water Communications Plan documents how and when communications with other marine users will occur to minimise interference with their operations and equipment.
- Vessel captains legislated responsibilities to communicate with other marine users and follow the On-Water Communications Plan.

6 Defining Acceptable Levels of Impact

CGG defined acceptable levels of impact and risk as part of its decision-making processes and published them as part of its consultation efforts, inviting relevant persons to comment on their appropriateness. During the preparation of the EP, it became clear that aspect specific statements would be necessary to create a stronger link between the defined acceptable level and the predictions of impacts and risks.

As such, Table E1-2 shows the general acceptable level statements which cover the whole of the activity (which are consistent across all environmental impacts and risks), and the corresponding aspect specific defined acceptable levels established for this assessment. Defining the acceptable levels is the starting point for the required demonstration that environmental impacts and risks of the activity will be of an acceptable level. The defined acceptable levels found in this section are subsequently carried through the prediction of impacts in this document, to the demonstration found in Section 10.[1]

Table E1-2 - General and Aspect Specific Defined Acceptable Levels

Category	Defined Acceptable Level (General)	Defined Acceptable Levels (Aspect Specific)	Rationale
Principles of ESD	The petroleum activity results in temporary / reversible, small scale, and/or low intensity environmental damage.	The physical presence of vessels does not cause changes in fishing catch patterns that result in measurable effects to the biomass or recruitment of target species.	This acceptable level ensures that any displacement or exclusion of fishing activity caused by the activity does not result in ecological consequences for target fish stocks through increased concentration of fishing in other areas. Preventing population-level effects is consistent with ecosystem-based fisheries management.
	The impact and risk assessment process are based on sufficient information to understand if: Serious/irreversible environmental damage is predicted; or The application of the precautionary principle is applied in the presence of scientific uncertainty.		
	Environmental management of the activity must not be inconsistent with EPBC Act Management Plans and Recovery Plans.		
Biological	Impacts and risks to biological features will be temporary / reversible, small scale, and/or low intensity environmental damage at population levels.		

[1] Note: The acceptable levels related to demonstrating ALARP and the adoption of specific measures to ensure the effectiveness of control measures can be found in Appendix F2 and B3 respectively. As they are criteria integral to the acceptance of the Environment Plan, and they are documented elsewhere, these criteria are not discussed further in this assessment.

Category	Defined Acceptable Level (General)	Defined Acceptable Levels (Aspect Specific)	Rationale
Ecological	Impacts and risks to ecological features will be temporary / reversible, small scale, and/or low intensity damage to the overall health, diversity, or functioning of the ecosystem.		
Economic	Affected persons will not be worse off because of the activity.	The activity is carried out in a manner that does not interfere with activities of another person to a greater extent than is necessary for the reasonable exercise of the rights and performance of the duties of the titleholder.	This acceptable level is based on Section 280 of the Offshore Petroleum and Greenhouse Gas Storage Act 2006, which establishes the legal requirement to minimise interference with other marine users. It reflects the principle that petroleum activities must be conducted with consideration for the rights and needs of others, including commercial fishers, shipping operators, and recreational users.
		Industries, livelihoods, and ecosystem services remain viable, with no sustained financial or operational consequences resulting from changes in species behaviour, abundance, or access to resources.	Reflects Commonwealth and State policy objectives for sustainable resource use and protection of ecosystem services.
Cultural	Impacts and risks to cultural features including cultural values, traditions, or practices, will be temporary / reversible, small scale, and/or low intensity.	Culturally important species, places, and practices can continue without disruption to their role, accessibility, or long-term viability.	This level reflects the principle of maintaining cultural values and heritage as protected under national and state legislation. It ensures that activities do not interfere with traditional practices, spiritual connections, or ongoing access to culturally significant areas.
Social	Measures have been adopted based on the consultation process to address relevant objections and claims of relevant persons.	People and communities can continue engaging with the natural environment, recreational activities, and heritage values without experiencing long-term or irreversible disruption.	This level reflects broader social licence to operate, ensuring that environmental activities do not lead to degradation of public amenity, loss of recreational use, or impacts to non-Indigenous heritage values. It aligns with Commonwealth policies promoting public access, well-being, and sustainable use of the marine environment.
	The views of public have been considered in the impact and risk assessment.		

Category	Defined Acceptable Level (General)	Defined Acceptable Levels (Aspect Specific)	Rationale
Company	Environmental impacts and risks are consistent with the CGG impact and risk assessment process such that for an impact or risk the effect/ consequence rating is medium or below.	As per the general levels.	CGG is a company familiar with managing the effects of seismic surveys on the marine environment, and its global operational history supports the reliability of its internal assessment process. The use of CGG's impact and risk matrix, when consistently applied, has not resulted in unacceptable environmental outcomes, which indicates the process produces conservative and realistic assessment outcomes.

7 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 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 2.

8 Minimisation of Impacts Through Activity Design

As part of planning and design of the activity several activity limitations were considered in accordance with the hierarchy of controls and through the consultation process (see Annex 2). These limitations were evaluated to determine whether the source of impact could be eliminated or substituted through changes in the timing, technology, or design of the activity. As described in Appendix F3, section 3.16.2, due to the interconnection between the tangible and intangible cultural values, all activity limitations are relevant to safeguarding social, economic, and cultural features and values, ensuring protection across all areas.

8.1 Elimination

Elimination involves removing the source of an impact or risk entirely through changes to the activity design. In the context of physical presence, this would require removing the vessels from the environment or conducting the survey in a way that does not result in interference with other marine users. Nine main options were considered:

Removal of vessels from the activity

While this may theoretically eliminate interference with other marine users, it is not practically feasible without eliminating the activity itself. Attempting to eliminate the physical presence of vessels would prevent the survey from occurring, which is inconsistent with the objectives of the Regia MSS. Any reduction in interference from the absence of vessels would come at the cost of not achieving the activity's primary purpose, and no viable alternative designs exist that can avoid all physical presence within the marine environment. For these reasons, this option was ultimately discarded.

In addition, CGG has adopted a set of spatial activity limitations that reduce the likelihood of interference with other marine users. These remaining activity limitations described below have subsequently been adopted:

No vessel movement within 4 nautical miles of the coast, except in case of emergency.

This limitation ensures no overlap with local yacht races. In response to consultation MSS is constrained to >50m depth which equates to minimum 25 km or 13.5 nm from the coast.

No sound source discharges within the Orange Roughy research program areas.

During consultation (Event IDs 2002, 3350, 1649, 2003, Feedback IDs 4125, 4305, 4124, 4337) claims were raised by a fishing association to avoid interference with an Orange Roughy Research Program by ensuring there was no data acquisition, or turns, over the sample collection areas, with a buffer between the acquisition and sample areas, with preferred non-acquisition months to be April to October. As shown in map MAP-REG-EPM-050_B (Appendix B12), the activity was reduced to ensure there is no overlap of sampling areas with the active source area, including turns.
There are no specific studies focused on seismic effects on Orange Roughy, however, inferences can be drawn from research on other species. In particular, multiple studies have investigated the impact of seismic surveys on the spawning behaviour of cod, given this is a period in the life cycle when individuals gather in large numbers (Mcqueen et al 2022, Mcqueen et al 2023). Both studies found cod were not significantly disrupted from their spawning behaviour after exposure treatments representative of a full seismic survey at distances ranging from 5-40km. These distances closely align with the proximity between the Regia MSS acquisition area and the Orange Roughy Study central sampling area, 5.27 km at its nearest point (see Appendix B12, map MAP-REG-EPM-050_B). Based on this, we do not anticipate any significant level of disturbance to Orange Roughy in the sampling area. A small portion of the central sampling area overlaps with the operational area; however, this will not have a greater impact than any other vessel transiting the area. Therefore, there is no break to the time series of the data, due to lack of overlap with the active source area. In addition, the Regia MSS is not prohibiting the ability of the research program to catch the fish required for the study to continue uninterrupted, negating the need for exclusionary months.

No seismic acquisition within 17 km of Deen Maar / Lady Percy Julia Island

The cultural heritage desktop assessment (Appendix B12), consultation, and desktop research identified the cultural significance of Deen Maar/Lady Julia Percy Island. The buffer zone was applied

to provide spatial protection for species utilising this ecologically and culturally important area, thereby reducing potential impacts.

This limitation reduced the overlap with most fishing effort in the region and. This is protective for mobile or short ranging fish species that are more likely to be present in water depth < 50 m. The shallow depths are also where most lobster will settle when ready to do so. This measure was adopted via consultation to avoid disturbance to coastal and nearshore invertebrate communities and to prevent elevated acoustic energy in shallow, sensitive environments. This was confirmed during consultation with commercial fishers who agreed that the data was correct and most fishing activities occurred in shallower waters close to ports (Event ID 4107, Feedback ID 1277).

No vessel movements in between Deen Maar/Lady Percy Julia Island and the mainland.

The cultural heritage desktop assessment (Appendix B12), consultation, and desktop research identified the cultural significance of Deen Maar/Lady Julia Percy Island, including the connection with spirits departing the mainland and travelling to Deen Maar (Appendix F3, section 3.16). As such the activity limitation for no vessel movements in between Deen Maar and the mainland was put in place.

No anchoring permitted within the operational area to eliminate benthic disturbance

This activity limitation is in place to prevent physical disturbance to the seafloor and sensitive benthic habitats within the operational area. By prohibiting anchoring, the risk of damaging benthic communities, such as corals, sponges, or other bottom-dwelling organisms, is eliminated, supporting broader environmental protection goals during the seismic survey.

No activities within a designated Australian Marine Park (State and Commonwealth)

This activity limitation has been adopted to ensure compliance with environmental regulations and to protect the ecological, cultural, and social values of designated Australian Marine Parks (both State and Commonwealth). These areas are established to conserve biodiversity and critical habitats, support the recovery of threatened species, and maintain ecosystem health. Prohibiting activities within these zones helps prevent disturbance to sensitive marine environments, avoids potential harm to protected species, and aligns with the legal frameworks governing marine conservation in Australia.

No MSS acquisition beyond 200 m depth contour

Deepwater habitats may support unique and less-studied fish assemblages that could be sensitive to noise and extending the survey beyond this boundary may increase environmental uncertainty and operational risk. The limitation was applied to confine the activity within a well-characterised depth zone and reduce exposure of deepwater species to anthropogenic sound.

No vessel movements within 700 m of fishing blocks G12, G13, H13, and H14

During consultation concerns were raised by a fisher regarding the use of a smaller vessel which the fisher launches from a pier in Port Cambell. This restricts the fisher to access deeper waters and limits the fisher to fishing blocks G12, G13, H13 and H14 exclusively (see MAP -REG-EPM-037_A in Appendix 12). To ensure this fisher was not worse off as a result of the activity, CGG implemented an activity limitation where the Regia MSS would not operate within 700m of Southern Rock Lobster Fishing Blocks G12, G13, H13, and H14. This activity limitation is based on the underwater sound modelling results where 700m is the no effect distance for invertebrates including Southern Rock Lobster, which is the target species fishers in these blocks.

While these measures do not eliminate physical presence entirely, they were incorporated into the survey design to remove vessel interaction from areas of higher marine user density where practicable. These adopted limitations reflect the application of elimination principles through activity design to the extent feasible within the operational and safety requirements of the survey.

A preference for the survey to occur in the April to June period, as this is after main fishing stock operations and has the least potential to impact any early upwelling events, was also received during consultation (Event ID 4370, Feedback ID 1300). While this has been noted, it was also taken into consideration that the survey already has minimal interference with the fishery, Southern Bluefin Tuna (SBT). As noted by the stakeholder, there is no active fishing within the Operational Area (rather a reliance on stocks that transit the region), the survey is limited to the shallow continental shelf, avoiding deep-sea canyons and the peak upwelling period, reducing potential impacts on pre-

spawning adult tuna in the Otway Basin. Therefore, other possible months for the activity have not been discarded for this preference.

The preference for acquisition to be during February to April was expressed during a group meeting with Southern Rock Lobster commercial fishers (Feedback ID 1064). Seismic acquisition will be undertaken in a north-west to south-east direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. As pots are generally set and hauled once each day relocation maybe required from an area for a period of days. As the majority of the Operational Area has only up to four fishers there is more potential to be able to relocate to an alternative viable area, therefore other possible months for the activity have not been discarded for this preference.

8.2 Substitution

Where elimination is not viable, substitution involves altering the timing, location, or sequencing of the activity to reduce the likelihood or consequence of the impact. Five main options were considered:

Seasonal Avoidance of Peak Fishing Overlaps

The first involved avoiding peak fishing seasons by introducing additional seasonal timing restrictions beyond those already in place. While fishing occurs throughout the year in the Operational Area, peak periods are concentrated in summer months, which have already been excluded from the planned timing of the survey. Avoiding additional, less productive fishing periods was considered, but this would require splitting the survey into multiple non-continuous phases or delaying it significantly. This would at least double the duration of the survey, increasing the total time the vessels are present in the environment. The extended duration would in turn elevate overall risks and impacts, including underwater noise, operational emissions, and prolonged displacement of other users. The marginal benefit of avoiding lower levels of fishing activity during less productive times was not considered sufficient to justify the increased environmental footprint. This option was therefore discarded.

Limiting Equipment Deployment and Retrieval to Defined Areas

The second substitution option considered was to restrict deployment and retrieval of streamers and the seismic source to within the defined Operational Area. While this would provide added certainty to other marine users about the spatial boundaries of the activity, it would also introduce higher operational risks. Deploying and retrieving streamers only while within the Operational Area increases the likelihood of entanglement, particularly during vessel turning manoeuvres. Furthermore, certain operational requirements such as weather avoidance or crew changes may necessitate brief movements outside the Operational Area. Maritime law already regulates safe vessel movement and ensures adequate notice is provided to other users, aligning with the environmental objectives of the activity. Given the limited environmental benefit of this option and the elevated risks associated with it, this measure was also discarded.

Further minimisation of potential interference has been achieved through additional activity limitations that substitute higher-risk spatial configurations with lower-risk alternatives. These spatial adjustments were made during the design phase to reduce conflict with other users without introducing unacceptable operational or environmental trade-offs. While not assessed as control measures under the ALARP framework, these decisions demonstrate the application of substitution principles through the deliberate avoidance of sensitive or high-use areas prior to formal risk assessment.

These considerations demonstrate that reasonable substitution options were evaluated as part of the environmental planning process. However, neither were adopted, as each option introduced operational inefficiencies, elevated environmental risks, or disproportionate trade-offs. The residual impacts associated with the physical presence of vessels remain, and these are addressed through further assessment and targeted management measures. **In waters deeper than 200 m, interfere with commercial fishers to no greater extent than is necessary for the efficient completion of the survey.**

In cooperation with fishers, this activity limitation has been adopted so survey vessel movements in water depths of greater than 200 m will avoid trawling activities.

If the survey occurs in September, October, November or December, the acquisition lines will be acquired working from the deepest lines first.

An operational planning preference of acquisition to start in the shallow and then work towards the deeper areas, was received during consultation (Event ID 4370, Feedback ID 1301). In further consultation (Event ID 4365) it was discussed with the stakeholder that acquisition direction (shallow-to-deep or deep-to-shallow) would depend on the time of year of acquisition. Under the Activity Limitations, no petroleum activity will occur between 1 January and 15 September, so the shallow–deep acquisition is no longer relevant. If the survey occurs in September, October, November or December, the acquisition lines will be acquired working from the deepest lines first, as this will assist in minimising impacts on Southern Right Whale (see Appendix E7, section 8.2). As described above in Section 8.1, the potential impact on Southern Bluefin Tuna is already minimal. To therefore summarise, these are some of the relevant reasons for adoption of both of these activity limitations.

The full list of activity limitations can be found in Section 4 of Appendix A2.

9 Predicted Levels of Impact

9.1 Changes to the functions, interests, or activities of other users

The limited manoeuvrability of the seismic survey vessel while towing the source array and streamers means that other marine users may have to avoid the immediate vicinity of the seismic survey vessel and towed equipment.

9.1.1 Commercial Fishing and Aquaculture

As detailed in Table E1-1 there are several Commonwealth and Victorian commercial fisheries that have fishing effort within the Operational Area. The following fisheries were assessed as having or potentially having a high level of activity within the Operational Area as detailed in Table E1-1:

- Commonwealth Southern and Eastern Scalefish and Shark Fishery
  - Commonwealth Trawl Sector.
  - Shark Gillnet Sub-sector.
  - Scalefish Hook Sector.
- Southern Squid Jig Fishery.
- Victorian Rock Lobster Fishery.

Commercial fishers may be impacted by having to avoid a part of the Operational Area while the survey is undertaken. This may be for hours or days depending on the fishing location within the Operational Area and the type of fishing equipment used. Fishers using pots, nets and traps which can become entangled with the seismic survey equipment may need to avoid an area for longer than trawling and squid jigging when acquisition is occurring.

These impacts are less likely for fisheries that were assessed as having a low activity level within the Operational Area (see Table E1-1). Further analysis and evaluation has been undertaken to assess the impacts to the commercial fisheries detailed above that have or potentially have a high level of activity within the Operational Area.

Table E1-2- Impact Assessment for Commercial Fisheries with High Fishing Intensity within the Operational Area

Fishery	Predicted Level of Impact	
Commonwealth Fisheries		
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Commonwealth Trawl Sector, Danish Seine Sub-sector (SCDS)	Impacts have been assessed as moderate based on: • The fishery uses Danish seine trawl where the gear is deployed with one end of a weighted rope attached to an anchor buoy. As the vessel sweeps in a large circle the rope is deployed sinking to the bottom, followed by the Danish seine net and another weighted rope until the vessel returns to the anchor buoy. Once a full circle has been made the gear is towed for approximately 30 minutes until the ropes come together. The towing operation then ceases, and the net is winched back onto the vessel scooping up fish that have been herded into its path by the ropes coming together on the bottom. The operation, called a shot, takes approximately 1 hour and 20 minutes (AFMA 2025). Thus, to minimise interactions and relocations communications prior to the start of the survey, and daily lookahead information will be provided during the survey. • Seismic acquisition will be undertaken in a north-west to south-east direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. Thus, the Danish seine trawl vessel would be able to utilise this area during this time. • There are potentially up to four or less fishers that may fish within the Operational Area and the Otway area (west of King Island to the Vic/SA border), thus if relocation is required there is more potential to be able to relocate to an alternative viable area that is still within a suitable range of Portland which is the only landing port within the Otway area. See Appendix B12 MAP-REG-EPM-132. • A measure has been adopted such that in cooperation with fishers, survey vessel movements in water depths of greater than 200 m will avoid trawling activities. Thus, relocation of fishers would be unlikely.	Moderate
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Commonwealth Trawl Sector (SCTR)	Impacts have been assessed as moderate based on: • The fishery uses otter board trawling where the trawl nets are towed through the water usually about 3 knots for a period of time, which is highly variable, 4-6 hours but may be shorter or longer dependant on location or target species, before being hauled up toward the vessel (AFMA 2025a). As both the trawl and seismic vessel are mobile, interactions and relocations can be managed by communications prior to the start of the survey, and daily lookahead information provided during the survey. • Seismic acquisition will be undertaken in a north-west to south-east direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. Thus, the trawl vessel would be able to utilise this area during that time. • The Active Source Area, where acquisition will be undertaken and where the seismic vessel will tow the streamers along the acquisition lines, overlaps a very small proportion (32 km^2 which equates to 0.73%) of the high intensity fishing area within the Otway/SA area (4,399 km^2). See Appendix B12 MAP-REG-EPM-103 High Intensity Area from ~142°5E to 140°15E. • The Operational Area where the surveys vessels are more likely to be able to avoid interactions overlaps a very small proportion (189 km^2 which equates to 4.3%) of the high intensity fishing area within the Otway/SA area (4,399 km^2). See Appendix B12 MAP-REG-EPM-103 High Intensity Area from ~142°5E to 140°15E. • There are potentially more than four fishers that may fish within the Operational Area and the Otway/SA area (defined above), however if relocation is required there is more potential to be able to relocate to an alternative viable area within the high	Moderate

Fishery	Predicted Level of Impact	
	intensity fishing area within the Otway/SA are off Portland which is the only landing port within the Otway/SA area (defined above). As shown in Appendix B12 MAP-REG-EPM-135 the trawl fishery main fishing area is centred on the 200 m bathymetry line, thus fishers are mainly moving along this line. As the Operational Area overlaps a small proportion (0.73% as detailed above) of the high intensity fishing area it is less likely that a fisher who may have to relocate will be displacing another fisher. • A measure has been adopted such that in cooperation with fishers, survey vessel movements in water depths of greater than 200 m will avoid trawling activities. As shown in Appendix B12 MAP-REG-EPM-135 the 200 m bathymetry line is the centre trawl line of the high intensity fishing area. Thus, relocation of fishers would be unlikely.	
Southern and Eastern Scalefish and Shark Fishery (SESSF) - Shark Gillnet Sub-sector (SSKN)	Impacts have been assessed as low based on: • The Active Source Area, where acquisition will be undertaken and where there is a higher likelihood of interaction with static gear such as gillnets, does not overlap the gillnet high intensity fishing area. See Appendix B12 MAP-REG-EPM-102. • Spatial closures progressively implemented since 2003 have resulted in gillnet effort being concentrated in Bass Strait (Butler et al. 2024). See Appendix B12 MAP-REG-EPM-130. In addition, there are no primary landing ports in the Otway area (west of King Island to the Vic/SA border). Based on this information it is unlikely that gillnet fishing is undertaken in the Operational Area. • The Operational Area overlaps where gillnet high, medium and low intensity fishing has occurred within 2010 to 2023, if fishing does occur in the Operational Area interactions and relocations can be managed by communications prior to the start of the survey, and daily lookahead information provided during the survey.	Low
Southern and Eastern Scalefish and Shark Fishery (SESSF) -Scalefish Hook Sector (SSCK)	Impacts have been assessed as moderate based on: • The fishery uses a variety of longline and drop hook methods. Longlines consist of baited hooks attached to the longline by short lines. The longline can be many kilometres long and can carry thousands of hooks. Pelagic longlines are not anchored and are set to drift near the surface of the ocean with a radio beacon attached so the vessel can track them to haul in the catch. Bottom longlines are held in place with anchors (AFMA 2025b). Each line is normally left to 'soak' for around 6 to 8 hours before being hauled onto the vessel (AFMA 2025b). Thus, to minimise interactions and relocations communications prior to the start of the survey, and daily lookahead information will be provided during the survey. • Droplines use a main line with an anchor at one end and a float at the other. Each hook is individually connected to a short 30-50 cm monofilament or cord 'snood' which is then clipped to the mainline (AFMA 2025c). Droplines are normally left to 'soak' for around 6 hours before being hauled (AFMA 2025c). The number of lines a vessel sets each day will depend on the vessel size and number of crew on board. Smaller vessels will often set less than 5 lines per day, whereas larger vessels with more crew can set more than 10 (AFMA 2025). Thus, to minimise interactions and relocations communications prior to the start of the survey, and daily lookahead information will be provided during the survey. • Seismic acquisition will be undertaken in a north-west to south-east direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. Thus, the longline and dropline fishing would be able to utilise this area during this time. • The depth which droplines are set in varies depending on the target species but generally ranges from 250 to 600m (AFMA	Moderate

Fishery	Predicted Level of Impact	
	2025c). As shown Appendix B12 MAP-REG-EPM-105, approximately 16% of the Operational Area overlaps with water depths >250 m (OA > 250m = 1095 km^2, OA is 6801 km^2). • There have only been up to four fishers within the Operational Area and the Otway area (west of King Island to the Vic/SA border) from 2018/19 to the 2023/2024 season, thus if relocation is required there is more potential to be able to relocate to an alternative viable area within a suitable range of Portland which is the only landing port within the Otway area. See Appendix B12 MAP-REG-EPM-105.	
Southern Squid Jig Fishery (SSJF)	Impacts have been assessed as moderate based on: • The Operational Area overlaps the fishery where there have been low, medium and high levels of fishing intensity during 2010 to 2023. See Appendix B12 MAP-REG-EPM-106. • The Operational Area overlaps a high proportion of the fishing area that is likely, due to its location (See Appendix B12 MAP-REG-EPM-106), to be fished from the Portland, thus it is unlikely that fishers would relocate to the other main fishing area closer to King Island. • The squid fishery vessels use lights to attract the squid to the vessel where they are caught using barbless lures on monofilament fishing lines which are jigged up and down in the water by machines (AFMA 2025d). Interactions and relocations with these more static vessels can be managed by communications prior to the start of the survey, and daily lookahead information provided during the survey. • Seismic acquisition will be undertaken in a north-west to south-east direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. Thus, the squid vessel would be able to utilise this area during that time. • As detailed in Stakeholder Record 4249, the timing of peak catches for the fishery has centred around February/March in the Western Victoria fishery hence avoiding undertaking the survey during this period has been implemented and the Activity Limitation, no petroleum activity will occur between 1 January and 15 September, has been introduced. The survey will occur in the September, October, November, and December window, avoiding the peak February/March period.	Moderate
Victorian		
Rock Lobster Fishery	Impacts have been assessed as moderate based on: • During 2011 to 2022 the maximum number of vessels that fished in a year within the Operational Area was nine and ranged from 1 to 9. The highest number of vessels (9, 7, 5) are in grids that are overlapped by a small proportion of the Operational Area (See Appendix B12 MAP-REG-EPM-111). • During 2011 to 2022 the maximum days fished in a year within the Operational Area was 212 days and ranged from 2 to 212 days. The highest days fished (112, 212, 174) are in grids that are overlapped by a small proportion of the Operational Area (See Appendix B12 MAP-REG-EPM-111). • Rock Lobsters are caught with baited pots that are generally set and hauled once each day (VFA 2023). Thus, to minimise interactions and relocations communications prior to the start of the survey, and daily lookahead information will be provided during the survey. • Seismic acquisition will be undertaken in a south-east to north-west direction with acquisition along a line taking a ~6 hours for the shorter lines and ~10 hours for the longer lines. As pots are generally set and hauled once each day relocation maybe required from an area for a period of days. As the majority of the	Moderate

Fishery	Predicted Level of Impact	
	Operational Area has only up to four fishers there is more potential to be able to relocate to an alternative viable area.	

9.1.2 Offshore Energy

ConocoPhillips Australia, Beach Energy and Cooper Energy hold petroleum titles that overlap with the Operational Area. Interference could occur if these companies are undertaking exploration, development, or P&A activities during the Regia MSS. To ensure impacts to ConocoPhillips Australia, Beach, Cooper and CGG are minimised, planning between the companies is ongoing and a Petroleum Simultaneous Operations (SIMOPS) Plan will be developed in the event activities are planned to occur at the same time in the same area.

9.1.3 Commercial Shipping

For vessels that are transiting through the Operational Area, such as shipping, they may be required to move around the seismic vessel when the streamers are deployed. This could result in a detour of 10 km and take approximately 16 minutes for a vessel travelling at 20 knots (38 km/hr). However, avoidance of slow-moving vessels or obstacles are normal practice for shipping vessels and impacts can be avoided by Notification to Mariners that alert ships to slow moving vessels or obstacles such as the survey vessel.

9.1.4 Marine Tourism and Recreational Fishing

Recreation and tourism could be affected by restricted access to an area where recreational fishing or fishing tours occur. Most vessel recreational fishing and fishing tours are day tours with no overnight stays. If a recreational fisher or fishing tour operator plans to fish within the Operational Area an area may need to be avoided for a short period of time (hours) while acquisition occurs in the area. From relevant person consultation undertaken during preparation of the EP, a low level of fishing tour operators (one to date) has been identified to occur within Operational Area. Impacts to recreational and fishing tour operators can be minimised via notifications and lookaheads as part of the On-Water Communications Protocol and the Communications Management System.

9.1.5 UXOs

The Operational Area overlaps with UXO sites 1052 King Island and SDG110 Sea Dumping – Bass Strait (Figure E1-1), however, as there are no planned events in which there is physical interaction between survey equipment and the seabed, impacts are not predicted.

9.1.6 Cultural Assessment

Vessels undertaking the petroleum activity may be observable from shore, however, the distance of the Operational Area from the nearest mainland shore is >17 km at the closest point, meaning that the vessels will not be conspicuous and would only be present for relatively short durations (<90 days). The Operational Area is 5.5 km from Deen Maar at the closest point. The distance of the Active Source Area from the nearest mainland shore is >20.7 km at the closest point and the distance of the Active Source Area from Deen Maar is >17 km (adhering to activity limitation: no discharge of sound source within 17 km of Deen Maar). Consultation and literature review indicated the importance of connection to coastal and marine areas for indigenous culture. The physical presence of vessels and associated potential for displacement of marine users has the potential to impact cultural features and heritage values through the following ways:

- Cultural obligations to care for Country: Environmental impacts may be assumed to impact rights and obligations to care for Sea Country. This distance of the activity offshore means that no Traditional Owners will be excluded from Sea Country.
- Knowledge of Country/customary law and transfer of knowledge: Indirect impacts to communities practicing these skills will inherently occur when threats to Sea Country values are felt. Despite this, there is no threat or impediment from the proposed activity on the

transmission of these skills and knowledge. This is particularly true when there are no predicted effects to species at populations levels, to ecosystem integrity, or biodiversity preservation (as demonstrated in Appendices E2-E9, F3 and F4).

- Connection to Country: Where people are displaced or disrupted (e.g., during colonisation) or where there is a loss of technical skills or environmental knowledge this may damage connection to Country (McDonald and Phillips, 2021). No impacts of this type are anticipated.
- Access to Country: Impacts to access to Country can only occur in areas that were traditionally accessed by First Nations peoples. No access issues are anticipated due to the distance offshore.

9.2 Predicted Levels of Impacts

The predicted level of effect to the functions, interests, or activities of other marine users from the physical presence of the survey vessel and towed equipment and the support vessels is assessed as moderate as there may be displacement, however impacts are temporary and, in most cases, avoidable based on:

- Communications prior to the start of the survey, and daily lookahead information provided during the survey. CGG will work proactively and collaboratively with other marine users so that both parties can plan activities in a manner that minimises potential displacement of each party.
- When the seismic vessel has equipment deployed it will typically move along pre-determined survey lines in the sail line plan in a racetrack pattern at a constant speed of ~ 3-6 knots (~ 5.5 to 11 km/hr). Updates to the sail line plan will be communicated to other marine users so they can proactively avoid the Survey Acquisition Area.
- No marine tourism or diving has been identified to occur within the Operational Area.
- Shipping deviations are predicted to be minor and have a negligible impact on travel times or fuel use. Deviations are normal practice, and impacts can be avoided by providing for Notices to Mariners that alert ships to slow moving vessels or obstacles such as the survey vessel.
- Impacts to Indigenous culture and values are not predicted from the presence of the vessels and equipment.
- A low level of fishing charter operators (one to date) has been identified to occur within Operational Area.
- Commercial fishing intensity within the Operational Area ranges from unknown, due to confidential data where there are less than five fishers, too high for the Victorian Rock Lobster Fishery, Southern and Eastern Scalefish and Shark Fishery Shark Gillnet Sub-sector, Commonwealth Trawl and Southern Squid Jig Fishery. Impacts to fishers is predicted to range from low to moderate based on the proportion of key fishing grounds that could be affected, fishing method and the fisheries' capacities to tolerate the predicted level of relocation to alternative viable areas.
- CGG will implement an adjustment protocol in the event displacement cannot be avoided and there is a financial loss to the marine user.

The uncertainty level in the assessment of impacts associated with of the physical presence of the survey vessel to the functions, interests and activities of other marine users is low given:

- Throughout the seismic survey, at least one support vessel will be in constant attendance to support on-water communication with other marine users.
- Notices to Mariners and lookaheads will alert fishers to slow moving vessels or obstacles such as the survey vessel.
- No planned activities in which there is physical interaction between survey equipment and the seabed.
- A Petroleum SIMOPs Plan will be developed in the event other titleholder's activities are planned to occur at the same time in the same area.

- Extensive relevant person consultation was undertaken during the preparation of the EP to identify other marine users that may be present within the Operational Area.
- Consultation did not identify impact pathways to marine tourism, divers, or physical indigenous culture values.
- For Commonwealth fisheries contemporary historical data up to the 2023/2024 season (2010 – 2023) has been used to inform the impact assessment. This dataset shows consistency in the areas fished. This has been supported by a review of AFMA fishery publications such as Fishery Status Report 2024, AFMA website and stakeholder consultation to identify any potential changes in fishing areas during the period of the Regia MSS (2024 – 2028).
- For Victorian fisheries contemporary historical data from 2011 to 2022 has been used to inform the impact assessment. This dataset shows consistency in the areas fished. This has been supported by a review of Victorian Fisheries Authority website and publications, and stakeholder consultation to identify any potential changes in fishing areas during the period of the Regia MSS (2024 – 2028).
- CGG will communicate with marine users prior to and during the survey to ensure other marine users can undertake their activities in a manner that avoids any interactions or can engage with CGG so that both parties can plan activities in a manner that minimises potential displacement to each party.

The predicted level of impact based on the effect (moderate) and uncertainty (low) is assessed as medium.

9.3 Industry Standard Mitigation Measures

9.3.1 Otway Adjustment Protocol

An adjustment protocol for unavoidable interference between commercial marine users and petroleum titleholders is an industry standard measure. ConocoPhillips, TGS, and CGG were founding members of a collaborative initiative called the Otway Marine Industries Coexistence Cooperative (OMICC). This initiative was in response to requests from commercial fishers, fishing industry associations, other stakeholders, and regulators for greater simplicity in making claims for compensation and to reduce consultation fatigue across the sector. OMICC has developed the Otway Adjustment Protocol (OAP), which originated from the National Energy Resources Australia (NERA) Commercial Fishing Industry Adjustment Protocol (NERA, 2021). The Otway Adjustment Protocol has been amended following feedback from fishers and fishing associations who TGS, CGG and ConocoPhillips have consulted with. It should be noted that following cessation of the planning of their proposed project TGS withdrew from OMICC.

9.4 Measures Adopted to Manage Environmental Impacts

The following measures have been adopted to ensure that the impacts associated with the physical presence of the survey and support vessels on other marine users' functions, interests, and activity will be of an acceptable level. These measures have been taken through to the ALARP assessment in the next stage of the CGG assessment process. This assessment can be found in Appendix F2.

Measure	Measure Type	Details and Justification
CGG Marine Assurance System	System	The CGG Marine Assurance System ensure compliance of contract vessels with legislative requirements including the Navigation Act, MARPOL, COLREGS and Marine Orders.
CGG Technical Operations Manager	Person	Reasonable, evidence-based claims are promptly assessed and paid as per the Otway Adjustment Protocol.
Quality Control and Reporting Representative	Person	Ensures that the contracted vessels follow the contract and deliver the survey as per the permitted activity by using the sail line plan.

Measure	Measure Type	Details and Justification
Support Vessel	Item of Equipment	Throughout the seismic survey, at least one support vessel will be in constant attendance to support on-water communication with other marine users.
Consultation Management System	System	CGG will implement a Consultation Management System which includes pre and during survey communications to ensure other marine users know when, where and how the Regia MSS will be undertaken. This will help them to undertake their activities in a manner that avoids any interactions with the survey. Alternatively, they can engage with CGG so that both parties can plan activities in a manner that minimises potential displacement to each party.
On-Water Communications Plan	Resource	Documents how and when there will be communications with other marine users to minimise interruption with their operations and equipment.
Communicate with other marine users	Responsibility	Vessel captains have legislated responsibilities to communicate with other marine users and follow the On-Water Communications Plan.
Streamer Tail Buoys	Item of Equipment	This item of equipment is used to mark ends of the streamers so that they can be detected by other vessels.
Sail Line Plan	Resource	Ensures that the survey vessel will remain within the scope and boundaries of the EP and reflects the activity limitations.
Adjustment Protocol	Procedure	An adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area. This will extend to fishing cooperatives who can provide an evidence of commercial losses because of the survey.
Fisheries Liaison Officer (FLO)	Person	This is a dedicated competent person available in a local port able to be responsive to any commercial fishers immediate concerns, provide a focal point for queries, and support compensation claims.
Petroleum SIMOPS Plan	Resource	Ensures coordination of activities with other titleholders in the region to minimise interference.
Sea Country Protection Plan	Resource	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.

10 Demonstration Impacts Will Be of an Acceptable Level

10.1 Principles of ESD, Biological and Ecological Categories

Temporary, Reversible, and Small Scale

The physical presence of survey and support vessels during the Regia MSS is predicted to result in temporary and reversible interference with the functions, interests, or activities of other marine users. The activity will occur over a defined period (up to 90 days) and within a clearly delineated Operational Area, with movement generally restricted to deeper waters and away from high-use zones where practicable. Displacement of other users, including commercial fishers and shipping, is predicted to be short-term and manageable via the measures adopted including the Adjustment Protocol. The assessment found no evidence of long-lasting environmental damage, with impacts characterised as localised and of low intensity.

Based on Sufficient Information

The impact assessment was informed by up-to-date fishery data (Commonwealth data 2010–2023, Victorian data 2011-2022), peer-reviewed sources, consultation input, and relevant persons feedback. Relevant fishery status reports and GIS-based analysis of fishing effort patterns were used to determine the overlap and sensitivity of marine user activities. The application of spatial and temporal constraints to the activity was shaped by known use patterns and seasonal pressures. The analysis confirmed that no irreversible impacts are predicted, and the precautionary principle was not triggered due to low uncertainty in predicted outcomes.

Activity not inconsistent with EPBC Act

No part of the activity's environmental management is inconsistent with relevant EPBC Act provisions or associated plans as it relates to physical presence of the survey.

10.2 Economic Category

The activity has been designed to minimise interference with the rights and functions of other marine users. Communication protocols and a Fisheries Liaison Officer ensure advance notice and real-time coordination with affected parties. Where impacts do occur, the adjustment protocol provides a structured and transparent mechanism to address them. This protocol has been successfully applied in previous activities, offering affected persons a fair and timely pathway to raise and resolve concerns, including loss of equipment, relocation costs, and/or reduction in catch per unit of effort. By documenting impacts, applying evidence-based assessments, and ensuring resolution outcomes are communicated and implemented, the adjustment protocol ensures that no affected person is left worse off because of the activity.

10.3 Cultural and Social Categories

While the vessels may be visible from culturally significant coastal sites such as Deen Maar, the distance offshore and short duration of activity (90 days) limit the potential for interference. Consultation identified connections between marine ecosystems and cultural identity, including species such as Southern Right Whales (Koontapool). As there are no impacts predicted to species at the population level or to physical cultural sites, cultural obligations and connection to Country will not be disrupted. The activity respects cultural protocols by avoiding sound discharge near Deen Maar and adhering to relevant consultation findings. Therefore, culturally significant species, Native Title rights and interests, places, and practices can continue without disruption; and people and communities maintain ongoing access to the natural environment, recreational activities, and heritage values without long-term or irreversible effects.

10.4 Consistency with Company Processes

The impact assessment followed the methodology outlined in Appendix B3 and used up-to-date fishery data, peer-reviewed sources, consultation input, and relevant persons feedback to assess spatial displacement, access restriction, and potential loss of function. The predicted level of effect to other marine users was assessed as moderate, with a low level of uncertainty, resulting in a medium predicted impact level. The activity integrates all mitigation measures recommended through

regulatory guidance and good industry practice, and the consequence ratings remain within CGG's established environmental limits.

This impact assessment has demonstrated that the effect of the physical presence of the survey vessels and towed equipment to marine users has a:

- Predicted level of effect of moderate (3).
- An uncertainty level of low (2).
- Predicted level of impact of medium (6).

11 Environmental Performance Outcomes

Environmental Performance Outcomes (EPOs) are measurable and activity-specific outcomes that describe the environmental performance the titleholder must achieve to ensure impacts and risks are managed to acceptable levels. EPOs are critical to the structure of an Environment Plan because they form the clear link between the defined acceptable level of impact and the predicted level of environmental consequence. Each EPO must be measurable, achievable, and within the control of the titleholder to implement, providing a transparent and enforceable statement against which performance can be assessed.

Table E1-3 - Environmental Performance Outcomes and Justifications

Defined Acceptable Level (From Table E1-2)	Environmental Performance Outcome	Rationale
The physical presence of vessels does not cause changes in fishing catch patterns that result in measurable effects to the biomass or recruitment of target species.	**The activity is scheduled and located to avoid exclusion of commercial fishing from known, high-effort fishing areas for more than 90 consecutive days, with no resulting adverse effects on fish stock status.**	This EPO ensures that the activity does not significantly disrupt commercial fishing operations or contribute to changes in stock status. A 90-day threshold provides a measurable and conservative duration to manage potential displacement, based on typical seasonal fishing patterns and operational windows. Replacing “core harvest areas” with “known, high-effort fishing areas” allows the titleholder to reference publicly available data (e.g. logbooks, AFMA catch records, or consultation feedback) to identify areas of concentrated fishing activity. This approach reflects a precautionary, evidence-based method for managing spatial conflict with other marine users while supporting sustainable fishery access and ecosystem health.
The activity is carried out in a manner that does not interfere with activities of another person to a greater extent than is necessary for the reasonable exercise of the rights and performance of the duties of the titleholder.	**As a result of the activity limitations and the adoption of the Otway Adjustment Protocol, no commercial marine user will be worse off because of the activity.**	This EPO is supported by consultation with marine users, assessment of spatial overlap with active areas of use, application of minimum safety zones, and appropriate notification of the activity. It ensures that any exclusion or restriction is temporary, limited in extent, and necessary to support the safe execution of the titleholder’s rights.
People and communities can continue engaging with the natural environment, recreational activities, and heritage values without experiencing long-term or irreversible disruption.	**Social, cultural, and economic features are protected, sustaining their value for people and communities.**	No marine tourism or diving has been identified to occur within the Operational Area. A low level of fishing charter operators (one to date) has been identified to occur within Operational Area. Transiting vessels may be required to divert short distances but will be able to plan their journey based on NOTMAs, etc. to minimise disruptions. Impacts to other companies undertaking exploration or development activities during the Regia MSS will be mitigated via a SIMOPs Plan.
Industries, livelihoods, and ecosystem services remain viable, with no sustained financial or operational consequences resulting from changes in species behaviour, abundance, or access to resources.		
Culturally important species, places, and practices can continue without disruption to their role, accessibility, or long-term viability.		This distance of the activity offshore means that no Traditional Owners will be excluded from Sea Country.

Defined Acceptable Level (From Table E1-2)	Environmental Performance Outcome	Rationale
Environmental impacts and risks are consistent with the CGG impact and risk assessment process such that for an impact or risk the effect/ consequence rating is medium or below.	**The activity is conducted such that environmental impacts and risks remain within the range assessed as medium or lower, with mitigation measures in place and functioning as intended.**	This EPO enables ongoing assessment of effectiveness through internal reviews and operational audits. It provides a clear link between the impact and risk assessment process and implementation strategy, supporting regulatory compliance and continuous improvement without requiring environmental outcome monitoring.

12 Recommendations

The predicted level of impact is medium and below pre-defined acceptable levels. The mitigation and management measures in place provide sufficient confidence around the predicted effect levels.

There may be effects to intangible cultural features because of the physical presence of the activity. It is recommended that these are assessed further in the next stage of the assessment process.

13 Document Control

Date	Revision	Update
20 June 2023	A	Draft prepared for initial comment
30 August 2023	B	Update based on comments and relevant person feedback
11 Sept 2023	0	Approved for release on Regia MSS website
20 Dec 2023	1	EP submission to NOPSEMA
23 October 2024	2	Updated following the NOPSEMA assessment process
16 April 2025	3	Updated following NOPSEMA OMR 1 Letter
6 December 2025	4	Updated following NOPSEMA OMR 2 Letter

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Annex 1

Input from Public Comment

The following consultation feedback was received since the beginning of the public comment period starting 25 January 2024. The table below shows how this feedback has been incorporated into the environmental assessments.

Matter	Matter ID	Changes made arising from public comment
Matter: Impacts to dive-based fisheries	F17	CGG has considered this claim and, based on the updated secondary sound modelling, has updated EP Appendix E8 (Impact Assessment – Underwater Sound: Surfers, Divers and Swimmers), Appendix A2 (Description of the Activity) and implement the following Activity limitationthe sound source will not be discharged at full power from areas which have been predicted to result in an exceedance of the safety criterion human health safety criterion for recreational divers, surfers and swimmers along the coastline. CGG has also made updates to modelling in Appendices (E1, E2, E3, E4, E5, E6, E7, F1 F3, G1 and G2).

Annex 2

Objections and Claims Raised from Consultation

During the consultation process relevant persons were invited to raise objections and claims about the adverse effects of the activity. An assessment of merit of each objection or claim has been made by CGG which can be found in the consultation report using the Feedback ID number shown in Table E1-4. If an objection or claim had merit and was relevant to this assessment it has been included in the table below.

Table E1-4 - Objections and Claims raised from consultation.

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
4001	Regia team not providing information on tonnes, species or revenue from potentially displaced trawl catch and claim this was titleholder indicating unwillingness to work to reduce the impact. Stakeholder stressed ABARES maps inaccuracies.	CGG obtained and provided the information from another reputable consultancy using ABARES data obtained via AFMA, which SETFIA use, this data is described in Appendix E1, section 4.1. Following feedback from SETFIA this was investigated, with AFMA confirming the reliability of the ABARES data (Feedback ID 1237), stating it uses logbook and other AFMA collected data. They did note that industry associations have previously been critical of the economic aspects of the ABARES data, however this data is based on in field surveying of fishing industry operators. However, the information being requested had no utility in managing impacts on commercial fishers. The stakeholder suggested the relevancy being for CGG to know how much they may need to pay via a compensation plan (Event ID 3382). This was deemed to have no utility for minimising impacts as the reports obtained by CGG allowed for consultation with commercial fishers to identify potential high impact areas and manage these. The data would not improve or add to the minimisation of interactions with SETFIA's members, all concessions possible have already been made, as documented in Appendix A2, section 4. The adoption of the compensation protocol is confirmed. An exclusion of acquisition in water deeper than 200 m was confirmed by local fishers to be workable and removed their concerns.	4786
4005	States a detailed data project could provide precise figures on tonnage and revenue, facilitating a more productive discussion.	CGG obtained and provided the information from another reputable consultancy using ABARES data obtained via AFMA, which SETFIA use, this data is described in Appendix E1, section 4.1. Following feedback from SETFIA this was investigated, with	4934

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		AFMA confirming the reliability of the ABARES data (Feedback ID 1237), stating it uses logbook and other AFMA collected data. They did note that industry associations have previously been critical of the economic aspects of the ABARES data, however this data is based on in field surveying of fishing industry operators. However, the information being requested had no utility in managing impacts on commercial fishers. The stakeholder suggested the relevancy being for CGG to know how much they may need to pay via a compensation plan (Event ID 3382). This was deemed to have no utility for minimising impacts as the reports obtained by CGG allowed for consultation with commercial fishers to identify potential high impact areas and manage these. The data would not improve or add to the minimisation of interactions with SETFIA's members, all concessions possible have already been made, as documented in Appendix A2, section 4. The adoption of the compensation protocol is confirmed. An exclusion of acquisition in water deeper than 200 m was confirmed by local fishers to be workable and removed their concerns.	
4019	Any negative impact on the marine environment would also have the potential to negatively impact my employment prospects in the area.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are also in place to reduce any impacts to as low as practicable.	1459
4334	This statement opposes seismic blasting in areas designated as Sacred Birthing Grounds for Southern Right Whales, underlining the cultural and environmental significance of these grounds. It also expresses solidarity with the Gunditjmara Traditional Owners, acknowledging the cultural heritage and environmental stewardship of this region by Indigenous communities. The feedback emphasises the perceived risks to both marine life and Indigenous heritage in the area.	The titleholder acknowledged this concern and confirmed that CGG will not carry out the survey whilst Southern Right Whales are present in their reproductive biologically important area. Confirmed that CGG are engaging with the local traditional owners and look forward to hearing their stories, learning about their culture, and protecting sea country (Event ID 2101).	2101
4303	The stakeholder stated that they were concerned about both tangible and intangible cultural heritage, as	Indicated that we will be performing non-invasive work in a site survey and could work with the TO's to help	1891

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	well as submerged underwater archaeology.	identify culturally significant sites (Event ID 1891).	
4332	This statement calls for a respectful approach, urging stakeholders to engage deeply with Indigenous knowledge and perspectives, including the views of Elders and Traditional Owners. It emphasises empathy and a meaningful understanding of the environmental and cultural impact of activities on marine life.	The titleholder acknowledged this concern and confirmed that CGG will not carry out the survey whilst Southern Right Whales are present in their reproductive biologically important area. Confirmed that CGG are engaging with the local traditional owners and look forward to hearing their stories, learning about their culture, and protecting sea country.	2101
4280	The stakeholder expresses strong opposition to the exploration for gas near Deen Maar (Lady Julia Percy Island), emphasising its significance to the local Indigenous community, comparable to the cultural importance of Uluru. They highlight its unique status as Australia's only offshore volcano and assert that such an exploration would be inappropriate in a site of sacred significance, arguing against the project's alignment with respecting Indigenous heritage and environmental integrity.	We are aware of the environmental, cultural, and spiritual importance of Deen Maar and will talk with local traditional owners to learn more about Deen Maar and understand how we protect and preserve the values of this site (Event ID 2108).	2108
4271	The stakeholder asserts that seismic blasts will have a direct negative impact on marine life, specifically mentioning that an "exclusion zone" will not effectively prevent the effects of the blasts from travelling through the ocean.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are in place to reduce any impacts to as low as practicable. The titleholder is aware of the environmental, cultural, and spiritual importance of Deen Maar and will talk with local traditional owners to learn more about Deen Maar and understand how to protect and preserve the values of this site.	2108
4216	Stated that they feel a sense of reparability to listen to the Gunditjmara people and what they wish for their sea country and ancient song lines.	Titleholder responded to the individual confirming consultation was currently being attempted with First Nations Custodians of Country and to engage with them on the activity. Titleholder requested that the individual encourage any potentially relevant people they may know to contact the consultation team and advised that consultation is an important aspect of the marine seismic survey planning process, community input and feedback will be considered in the planning and execution of the survey.	842

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4356	Concerns about the harm and damage to the marine ecosystem.	Titleholder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the marine environment within the area of operation. Mitigation plans are in place to reduce any impacts to as low as practicable.	2831
4052	Concern about the impact of the testing on yacht racing off the coastline of Port Fairy.	Titleholder responded to individual advising that the activity will occur approximately 25km offshore (at the closest point) and that the survey is being refined through the consultation process and the distance might change.	3092
4059	Concern about the potential impact on the Abalone industry and the need for compensation if marine species are killed off.	Titleholder acknowledged this concern and noted that potential impacts to commercial fisheries from physical presence is assessed in E1 of the EP, and potential impacts to marine invertebrates from underwater sound is assessed in E4 of the EP. Advised that control measures to reduce impacts to commercial fishers as a result of loss of catch are outlined in the EP and include Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	2089
4067	Concern regarding the repeated seismic blasting in the area, which may have effects on marine life. Stakeholder is questioning the impact of multiple blasts and the potential for further exploration by other companies, particularly regarding the sale of seismic data.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are also in place to reduce any impacts to as low as practicable. Cumulative impacts are also assessed as negligible.	879
4072	Concerned of impacts to commercial fishing business	Engaged with stakeholder to understand their concern and undertook thorough assessment, including reviewing paper submitted by stakeholder and providing stakeholder references as requested.	4446
4073	Concerns about impacts both reputational and physical to the region if the activity is allowed.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are also in place to	1244

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		reduce any impacts to as low as practicable.	
4074	Concerns about implications for the population of Rock Lobsters in the area going forward.	This claim has been thoroughly assessed in E1 and E5, and F3 for southern rock lobsters. The known effects to individual lobsters are not predicted to have any measurable effect on population levels or dynamics.	2773
4081	Concerns about the impact on whale habitat, endangered marine life, and commercial fisheries	Titleholder acknowledged this concern and noted that potential impacts to whales and relevant endangered marine species is assessed in the EP Chapters on underwater sound and light (E2-E7, and E9). Any interactions with seismic are mitigated and managed through spatial boundaries and a comprehensive fauna management plan. Advised that control measures to reduce impacts to commercial fishers because of displacement are outlined in the EP and include Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	4551
4083	Concerns about why more seismic needed and what time of the year was the survey going to be done to minimise impacts to fishing for sharks, lobsters, squid	Titleholder acknowledged this concern and each of the species within this claim has been subject to extensive assessment in E1, E3, E4 and F3 with various measure adopted to limit the sound exposure to the lowest level possible to meet geophysical objectives and to protect marine fauna (see G1).	740
4084	Concerns for reduced landed catch during the survey due to displacement. Have historical data going back many years to show if changes.	The titleholder has acknowledged this concern and note that displacement is assessed in the EP E1 and F3 as a potential impact of the physical presence of the activity. Control measures to reduce impacts to commercial fishers as a result of displacement are outline in EP. The Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area. While onshore fish processing is not covered by NERA protocol a claim will	4108

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		be considered based on appropriate historical evidence.	
4096	Environmental Risk: Concerns about the environmental impact of seismic testing on marine life and the clash between business interests and environmental protection.	Regia EP has conducted thorough impact assessments for all relevant receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals, in relation to underwater sound and artificial light as aspects of the activity. Other marine users have also been considered in another impact assessment that considers physical presence as an aspect of the activity. The Regia MSS is required to define acceptable levels of impact and risk, and work below those levels. Acceptable levels of impact are established based on relevant up-to-date technical and scientific studies, government advice, and are considerate of the information gathered through the consultation process. This information is used to make predictions of the levels of impact we expect to occur and compares those to the previously defined acceptable levels and is presented in the Environment Plan. Measures to minimise adverse impacts on relevant biological receptors in the region and relevant mitigation measures are outlined in the EP.	2766
4109	Fishers discussed the historical impact of seismic surveys on the fishing industry, specifically noting that the “3 mile” area, which previously supported two vessels’ catches, has become unfishable since seismic activities.	Regia MSS committed to providing a map of historic seismic activity (2D and 3D) across the proposed area. As well as Map of Regia MSS Acquisition Area, Draft Regia Compensation Protocol, Map of all seismic surveys for past 20-25 years in the region, Fishery Report with analysis of all catch rates, draft impact assessment for fishing (Event ID 1892).	1892
4114	I have serious concerns regarding effects to local industry - tourism and fishing in particular.	The titleholder acknowledged the feedback, noting that impacts are assessed in the Environmental Plan (EP) and can be found in E1. Measures to minimise adverse impacts on functions, interests and activities on other marine users including commercial and recreational fishers and marine tourism, are outlined in the EP.	2117
4124, 4125 & 4305	Interference with Orange Roughy Research Program: request for no data acquisition, or turns, over the sample collection areas, with buffer between the acquisition and sample areas.	As shown in map MAP-REG-EPM-050_B (Appendix B12), the activity was reduced to ensure there is no overlap of sampling areas with the active source area, including turns. There are no specific studies focused on seismic effects on Orange Roughy, however, inferences can be drawn	1649, 2002 & 3350

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		from research on other species. In particular, multiple studies have investigated the impact of seismic surveys on the spawning behaviour of cod, given this is a period in the life cycle when individuals gather in large numbers (Mcqueen et al 2022, Mcqueen et al 2023). Both studies found cod were not significantly disrupted from their spawning behaviour after exposure treatments representative of a full seismic survey at distances ranging from 5-40km. These distances closely align with the proximity between the Regia MSS acquisition area and the Orange Roughy Study central sampling area, 5.27 km at its nearest point (see Appendix B12, map MAP-REG-EPM-050_B). Based on this, we do not anticipate any significant level of disturbance to Orange Roughy in the sampling area. A small portion of the central sampling area overlaps with the operational area; however, this will not have a greater impact than any other vessel transiting the area. Therefore, there is no break to the time series of the data, due to lack of overlap with the active source area. An activity limitation of No sound source discharges within the Orange Roughy research program areas, is in place.	
4337	Interference with Orange Roughy Research Program: request the exclusion starts a month earlier from April 2024	As shown in map MAP-REG-EPM-050_B (Appendix B12), the activity was reduced to ensure there is no overlap of sampling areas with the active source area, including turns. A small portion of the central sampling area overlaps with the operational area; however, this will not have a greater impact than any other vessel transiting the area. Therefore, there is no break to the time series of the data, due to lack of overlap with the active source area. An activity limitation of No sound source discharges within the Orange Roughy research program areas, is in place. As the Regia MSS is not prohibiting the ability of the research program to catch the fish required for the study to continue uninterrupted, negating the need for exclusionary months.	2003
4153	Presents a historical account of their catch rates over 24 years, indicating that seismic surveys in the past led to a significant decrease in their catch from 10-15 tons per trip to just 5-6 tons per trip for over two years. They now report a catch rate of 10-14 tons	Titleholder acknowledged this concern and noted that potential impacts to molluscs the Regia MSS is assessed in E1, E4 and F3 of the EP. Advised that control measures to reduce impacts to commercial fishers as a result of loss of catch are outlined	5190

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	per 7 days, suggesting lingering concerns about how current seismic activities may similarly affect their fishing operations.	in the EP and include Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	
4165	Risk of losing craypots due to being cut off by vessels during transit.	Titleholder acknowledged this concern and noted that displacement is assessed in the EP Chapter on physical presence (7.4.1.4 and E1) as a potential impact of the physical presence of the activity. Advised that control measures to reduce impacts to commercial fishers as a result of displacement are outlined in the EP and include mitigation measure: Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	4516
4173	Seismic blasting has adverse effects on the marine environment, with critical gaps in understanding the effects on individual species and the marine environment as a whole.	The titleholder responded with an explanation of the information sources used to inform the Regia MSS impact and risk assessments, and explained how these information sources and resulting measures are specific to the potential impact. The titleholder also made reference to documents relevant to this claim within the environment plan (Event ID 4092).	4091
4180	Seismic testing and gas exploration/drilling pose undeniable risks to marine fauna, flora, ecosystems, local fishing, and tourism industries.	Petroleum activities do not operate to a no-impact standard. Instead, the Regia MSS is required to define the acceptable levels of impact and risk, and work below those levels. Acceptable levels of impact are established based on relevant up-to-date technical and scientific studies, government advice, and are considerate of the information gathered through the consultation process. This information is used to make predictions of the levels of impact we expect to occur and compares those to the previously defined acceptable levels and is presented in the Environment Plan	2118
4188	Stakeholder expressed concern having other displaced fisherman	Titleholder acknowledged this concern and noted that displacement is assessed in the EP	4516

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	moving into the area they work in has resulted in reduced catch rates.	Chapter on physical presence (7.4.1.4 and E1) as a potential impact of the physical presence of the activity. Advised that control measures to reduce impacts to commercial fishers as a result of displacement are outlined in the EP and include the Adjustment Protocol which stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	
4204	Stakeholder provided feedback post Regia team attendance at AGM regarding OMICC, the report and fishing data. Specifically disputing the claim that the 2019 SETFIA report did not provide an accurate estimation of effects. The feedback asserts that the report is, in fact, highly accurate, detailing the average catch tonnage from fishing operations in the survey area over the past 20 years and using current pricing data. The data was compiled by Fishwell Consulting. It is suggested that CGG may have misunderstood the implications of displacement, believing that all catch would require compensation, while the report indicates that only a portion (20-25%) of catch was affected, emphasising the relevance of these findings for projects in the Otway region.	CGG has already responded to many of these claims in prior correspondence. Avoidance measures and mitigation measures have been adopted to manage interference with commercial fishers. CGG does not misunderstand the importance of historical data, but it is not relevant to the future activities of commercial fishers or have any relevance to the management of interactions.	5231
4213	Stakeholder wanted to enjoy recreational activities without the disruption and destruction caused by the proposed activities.	Titleholder responded advising that displacement of recreational marine users is an assessed impact of the activity that is temporary and recoverable. The activity occurs no closer than 25km to the coastline at its closet point (south of Port Fairy) and lasts for no longer than 90 days.	820
4214	Stakeholder was mainly worried about being displaced from their fishing areas due to the activity.	Titleholder acknowledged this concern and noted that displacement is assessed in the EP Chapter on physical presence (7.4.1.4 and E1) as a potential impact of the physical presence of the activity. Advised that control measures to reduce impacts to commercial fishers as a result of displacement are outlined in the EP and include the Adjustment Protocol which stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the	4516

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		fishery associations that represent the commercial fishers that fish within the Operational Area.	
4219	Survey timing - trawling occurs all year round so shifting timing isn't a protective measure for the economics of the survey.	In addition to the avoidance of the aggregated peak fishing effort in the summer (January, February, and March), the acquisition area has been reduced following consultation to the 200m depth contour, with acquisition in no shallower than 50m water depth. A comprehensive adjustment protocol to pay for evidence-based claims of unavoidable interference with commercial fishers is also in place, along with communications protocols to minimise interference.	4788
4221	The Association expresses concern regarding the potential impacts of the survey, emphasising that the lack of accurate data makes it impossible to determine what those impacts might be. Additionally, members voiced apprehension about CGG's ongoing criticism of the independent consultancy Fishwell, which produced the 2019 report and related BACI study. They view this criticism as a potential tactic to undermine Fishwell's credibility, suggesting that such actions reflect poorly on CGG.	CGG has responded to these claims previously. The accuracy of the historical data has no influence on how the future interactions between commercial fishers and the Regia MSS will be managed. The economic impact to individual fishers will be determined by claims being made through the adjustment protocol and reasonable evidence-based claims will be paid. Further, CGG did not criticise the Fishwell report. CGG did assert that SETFIA/SSIA using the data as an indicator of impact measurement is not appropriate.	5231
4223	The comment states that harming the environment, which is essential for social, cultural, and economic well-being, would be irresponsible. They advocate against the introduction of new gas projects, emphasising the need to prioritise environmental protection.	The titleholder responded indicating Oil and gas activities have occurred in this region for 25 years. The titleholder indicates the industries strong environmental performance. The titleholder ensures impacts will be short-term by maintaining by applying the highest environmental standards for seismic surveying in Australia.	2098
4229	The feedback asserts that CGG's estimation is inaccurate for two main reasons. First, it assumes that fishing activity is uniformly distributed across the fishery, which contradicts the realities of commercial fishing. Second, participants in the meeting expressed concerns about the use of average prices, indicating that it fails to reflect the current value of fish. The feedback points out that it was unclear whether the price data used was from the past 10 or 20 years, suggesting that the average price per kilogram cited by CGG is likely only half of the actual market value. Additionally, it is argued that the average prices may have been	CGG has responded to these claims previously and has outlined the approach to compensation in the OMICC protocol. There have been plenty of opportunities for the relevant person to raise new issues. Further refinements can be made for individual fishers through the evidence-based process which is specific to individuals. The claims made by this person about matters that relate to the whole fishery are irrelevant to compensating displaced fishers.	5231

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	derived from data across the entire fishery rather than being specific to the fish species caught in the Otway Basin and landed fresh in Portland.		
4233, 4234	The feedback provided raises a concern from both SETFIA and SSIA that the titleholder should fulfill its claimed regulatory obligation, and that they remain of the belief, to take reasonable measures to mitigate impacts on stakeholders. They suggest conducting a 20-year data review of catch records across all fisheries, especially their own, to better understand the volume and economic value of catch areas that overlap with the planned activity. By analysing this data, the stakeholders believe that collaborative solutions could be identified to reduce the impact on fisheries with potentially minimal loss to the company's acquisition area.	CGG obtained and provided the information from another reputable consultancy using ABARES data obtained via AFMA, which SETFIA use, this data is described in Appendix E1, section 4.1. Following feedback from SETFIA this was investigated, with AFMA confirming the reliability of the ABARES data (Feedback ID 1237), stating it uses logbook and other AFMA collected data. They did note that industry associations have previously been critical of the economic aspects of the ABARES data, however this data is based on in field surveying of fishing industry operators. However, the information being requested had no utility in managing impacts on commercial fishers. The stakeholder suggested the relevancy being for CGG to know how much they may need to pay via a compensation plan (Event ID 3382). This was deemed to have no utility for minimising impacts as the reports obtained by CGG allowed for consultation with commercial fishers to identify potential high impact areas and manage these. The data would not improve or add to the minimisation of interactions with SETFIA's members, all concessions possible have already been made, as documented in Appendix A2, section 4. The adoption of the compensation protocol is confirmed. An exclusion of acquisition in water deeper than 200 m was confirmed by local fishers to be workable and removed their concerns.	5194
4235	The feedback questions if a strong environmental record includes the severe impacts of seismic activity on fishing industries, like the scallop industry near King Island, which has suffered losses reportedly without compensation.	Seismic survey effects on molluscs, including scallops are well understood and not mortal in our circumstance. There are many environmental pressures that cause fluctuations in fish populations, not just sound. We have a track record of successful co-existence with the fishing industry and of paying reasonable evidence-based claims for compensation - which we will do for the Regia survey.	2083
4239	The feedback raises concerns about the impact of seismic activities on the	It would be unacceptable to have mortal effects on any marine species	2093

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	Abalone industry, suggesting that the industry may be negatively affected by the proposed exploration and seismic testing. This indicates a broader concern for the sustainability of marine life and the economic implications for local fisheries.	from our or any marine seismic survey. We do not predict mortal effects to molluscs (including scallops, abalone, oysters, clams, mussels, limpets, squids, octopus and cuttlefish etc.). Our full assessment of predict impacts on molluscs will be made publicly available as soon as it's completed.	
4242	The fisher expressed concerns due to his smaller vessel, which he launches from the Port Campbell jetty. Unlike larger vessels, his boat's size limits his ability to access deeper or more distant waters.	Understand the constraints on RP and the nature of RP's operations. As a result, confirmed that CGG would consider an exclusion zone around RP's preferred fishing blocks.	2026
4249	The largest jig fishery for squid in Bass Strait operates in the depths and area proposed for the project, raising concerns about the impact on squid reproduction.	As stated in the Commercial Fishers Information Sheet, the Southern squid jig fishery has been identified as present in the area and as such has been assessed in the Impact Assessment and in our Acceptable Levels of Impact and Risk document. From this research and assessment, the following mitigation effectiveness was concluded: While the probability of adverse consequences for squid populations from seismic is extremely low it is appropriate to reduce any probability to as low as possible. The timing of peak catches has centred around February/March in the Western Victoria fishery hence avoiding seismic during this period is advisable. Two windows have been identified for the survey to occur, being April – June and September – December, avoiding the February-March period.	3917
4253	The possible effects to marine life and ecosystems is my primary concern	Petroleum activities do not operate to a no-impact standard. Instead, the Regia MSS is required to define the acceptable levels of impact and risk, and work below those levels. Acceptable levels of impact are established based on relevant up-to-date technical and scientific studies, government advice, and are considerate of the information gathered through the consultation process. This information is used to make predictions of the levels of impact we expect to occur and compares those to the previously defined acceptable levels and is presented in the Environment Plan	2117
4259	The proposed works will harm and damage the climate and ocean life.	Petroleum activities do not operate to a no-impact standard. Instead, the Regia MSS is required to define the acceptable levels of impact and risk, and work below those levels. Acceptable levels of impact are	2256

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		established based on relevant up-to-date technical and scientific studies, government advice, and are considerate of the information gathered through the consultation process. This information is used to make predictions of the levels of impact we expect to occur and compares those to the previously defined acceptable levels and is presented in the Environment Plan	
4265	The seismic process is going to affect local marine life, ecosystems, and the climate in the community.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are also in place to reduce any impacts to defined acceptable levels and as low as reasonably practicable.	1259
4267	The Stakeholder also objected to the project on the basis that it would impact every marine creature and sea bird.	Acceptable levels of impact are established based on relevant up-to-date technical and scientific studies, government advice, and are considerate of the information gathered through the consultation process. This information is used to make predictions of the levels of impact we expect to occur and compares those to the previously defined acceptable levels and is presented in the Environment Plan. Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of any taxa within the area of operation. Mitigation plans are in place to reduce any impacts to as low as practicable.	2064
4274	The stakeholder claims that seismic exploration poses a significant danger to marine life in general. This claim suggests a strong opposition to the practice due to its perceived harmful effects on the marine ecosystem as a whole.	The titleholder publicly responded to this interactive map comment explaining that legislative framework in Australia permits some impact from offshore petroleum if it is managed and of an acceptable level. We believe that responsible development of gas is essential for maintaining the current quality of life we all enjoy and ensuring we pass that quality of life on to future generations. Gas is part of the Labour governments energy transition plan.	2107
4285	The stakeholder noted their concern as a resident of Port Fairy: noise (land and sea), impact on marine life, potential impacts on the	We are also concerned about the welfare of marine fauna. We have undertaken an impact assessment process that includes whale, seals, pelagic and shorebirds. As part of this assessment, we must show that	1747

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	environment and the future potential if gas is found.	impacts to these species will be of an acceptable level. We have determined that it is acceptable to have temporary behavioural changes, such as moving away from the survey vessel, and no injury or long-term impacts. Our Preliminary Environmental Impact and Risk Assessment document has been published on the project website and is available here. We are also publishing environmental impact, risk and mitigation documents as they are completed, in the document library. We are publishing the entire documents in order to remain transparent, but I have also attached a summary document.	
4295	The stakeholder recounted a previous experience where seismic surveys harmed the fishery for two years. They possess catch history data that highlights the decline in fish populations before and after the survey activities took place.	Titleholder acknowledged this concern and noted that potential impacts to commercial fisheries from physical presence is assessed in E1 of the EP. The titleholder advised that control measures to reduce impacts to commercial fishers because of loss of catch are outlined in the EP and include Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that represent the commercial fishers that fish within the Operational Area.	5190
4308	The stakeholder was concerned about the environmental impact on Port Fairy residents who have fishing businesses and recreationally fish in the area.	Impacts from physical presence on both commercial and recreational fishing are assessed in the Environmental Plan (EP) and can be found in E1. Measures to minimise adverse impacts on functions, interests and activities on other marine users, including commercial and recreational fishers in the region are outlined in the EP.	2273
4311	The stakeholder, who owns and operates two commercial fishing trawlers based in Portland, Victoria, expressed concern about the potential effects of seismic activities on the southeast trawl operations.	Titleholder acknowledged this concern and noted that potential impacts to commercial fisheries from physical presence is assessed in E1 of the EP. Advised that control measures to reduce impacts to commercial fishers as a result of loss of catch are outlined in the EP and include Adjustment Protocol stipulates an adjustment process will be implemented if a commercial fisher has a financial loss due to the Regia MSS. The adjustment process will be developed in consultation with the fishery associations that	5190

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		represent the commercial fishers that fish within the Operational Area.	
4336	Threat to coastal aesthetics of Port Fairy and potential impact on property value and tourism income.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will be operating at >25km from the coast and will not impact any aesthetics.	1263
4342	Attendees stated that the fishery has seen significant improvement, marking its best condition in about six years, since the last seismic activity in the region. This feedback highlights concerns regarding the potential negative impacts of upcoming seismic activities on the current health of the fishery.	The titleholder acknowledged the feedback, noting that impacts are assessed in the Environmental Plan (EP) and can be found in E1 and F3. Measures to minimise adverse impacts on functions, interests and activities on fisheries are outlined in the EP.	1529
4343	Questions possibility of compensation for the abalone industry if their stocks are depleted as a result of seismic testing, drawing a parallel to the scallop industry near King Island that was adversely affected. It highlights concerns regarding accountability and the financial implications for local fisheries in the event of ecological harm.	The titleholder acknowledged this concern and noted that potential impacts to the abalone industry. It would be unacceptable to have mortal effects on any marine species from our or any marine seismic survey. We do not predict mortal effects to molluscs (including scallops, abalone, oysters, clams, mussels, limpets, squids, octopus and cuttlefish etc.). Our full assessment of predict impacts on molluscs can be found in E1 Section 8, E4 Section 8 and F3 Section 4.	2093
4365	Concerns about the lack of definitive clarification on how seismic testing affects the marine environment and the clash between economic interests and environmental risks.	The titleholder acknowledged the feedback, noting that they have undertaken a thorough analysis and assessment of all relevant literature to inform the impact assessments conducted to assess potential impacts from underwater sound to relevant receptors, including plankton, fish, invertebrates, birds, turtles, and marine mammals in the Environmental Plan (EP). These findings can be found in E2, E3, E4, E5, E6, and E7 under Section 8: Predicted Levels of Impact. Additional assessments of key receptors were also completed to demonstrate that environmental impacts and risks arising from the activity will be of an acceptable level (F3). Titleholder also conducted an assessment to investigate potential impacts to other marine users from physical presence resulting from the activity (E1).	2383
4537	The stakeholder raised an objection to seismic surveys as they negatively affect the fishing industry, local economy and environment.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population stability of	424

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		commercial fish species and sensitive species within the area of operation. The MSS will also not impact the local economy. Mitigation plans are in place to reduce any impacts to as low as practicable.	
4417	The relevant person was concerned that about the proposed seismic activity effecting the behaviours of certain species.	Event ID 6880 - The Regia team responded in-meeting that the first half of the EP is associated with assessment work undertaken prior to commencing the activity. First and foremost, because there are so many different species, they explained that they had grouped species together from a physiological perspective. Secondly, the Regia team explained that their focus is on the mega-fauna and species which have protection under the EPBC act.	6880
4433	Seismic impacts can linger longer than the few hours suggested, the insistence on peer-reviewed work to prove this is opportunistic and suits OMICC's agenda.	Event 6724 - OMICC announces that the latest version of the OMICC Otway Adjustment Protocol has been published, along with a video briefing for fishers, which can be accessed through a provided link. In the briefing, OMICC confirms that, following the relevant persons feedback, a "claim period" and a "lodgment period" have been incorporated into the definitions of the protocol. The claim period is set to 30 days after the end of any activity, while the lodgement period extends up to 6 months after the end date of any activity. OMICC further informs the relevant person that the OMICC Founders reviewed the request for claims up to 6 months after an activity. However, the decision was made to adopt a 30-day claim period, as this duration resulted in a positive compensation outcome for fishers affected by the Gippsland survey in 2019.	6749
4434	It is critical that fishers are compensated if their catches are negatively impacted by MSS.	A compensation protocol has been adopted.	6749
4436	The relevant person stated that it was evident what had impacted rock lobsters in the early 2000s.	Event ID 6595 - Titleholder responded to relevant person outlining approach to assessment of fisheries and SRL, including assessment of mitigations in place.	6594
4449	Concerned about unexploded ordinance in the area.	Event ID 6875 - The Regia team responded in-meeting and explained they had worked with the Department of Defence and that anything the fishers may be finding	6875

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		could be the result of munitions dumped post- World War 2.	
4452	Stakeholder claims that potential impacts on World Heritage Values of Budj Bim and the life-cycle of Kooyang have not been properly assessed or addressed.	Regia team responded by referencing the relevant impact assessments in the Environment Plan (EP) (EVT070), this information was also provided in Event ID 7363. Previously provided in Event ID 2521, 2356, 2357, 2358, 2359, 2360, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417.	7136
4453	Stakeholder claims that potential impacts on World Heritage Values of Budj Bim and the life-cycle of Kooyang have not been properly assessed or addressed.	Regia team responded by referencing the relevant impact assessments in the Environment Plan (EP) (EVT070), this information was also provided in Event ID 7363. Previously provided in Event ID 2521, 2356, 2357, 2358, 2359, 2360, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417.	EVT070
4487	Claims that CGG's proposed activities are inconsistent with the Recovery Plans made under the EPBC Act, the Southern Right Whale Recovery Plan and the Blue Whale Recovery Plan. GMTOAC states that these activities pose known physical and behavioural risks to the Eastern Population of Southern Right Whales and to Pygmy Blue Whales. These risks include impacts from anthropogenic underwater noise, particularly seismic noise, vessel strikes, climate-driven changes in prey availability, and the cumulative effects of these pressures, all of which have the potential to injure or kill individuals and affect populations. GMTOAC notes that under the EPBC Act Program and NOPSEMA's decision-making guidelines, an Environment Plan cannot be accepted if it is inconsistent with a recovery plan. It emphasises that both Recovery Plans contain "Very High" importance actions requiring that Blue Whales and Southern Right Whales must be able to continue using their Biologically Important Areas (BIAs) without auditory impairment, injury, or displacement. The plans also call for preventing disruption and displacement of Karntubul (Southern Right Whales) from BIAs due to anthropogenic noise such as seismic surveys.	CGG maintains that its approach aligns with statutory obligations and industry best practice. It asserts that all regulatory requirements under Regulation 34 have been met, and that its environmental performance outcomes and control measures are grounded in the best available science and tailored to the ecological and cultural sensitivities revealed through consultation. The Regia MSS Environment Plan (EP) was designed to ensure impacts and risks are reduced to As Low As Reasonably Practicable (ALARP) and to an acceptable level. Regarding whale protection, CGG highlights that the EP includes specific mitigation measures for culturally and ecologically significant marine fauna, including species noted in relevant Recovery Plans. Early correspondence in February 2023 identified Southern Right Whales and Pygmy Blue Whales as key sensitivities, and the EP commits to spatial and temporal avoidance measures, sound-source shutdowns, and exclusion zones to protect them. These measures explicitly consider cultural significance, such as timing restrictions to avoid the Karntubul (Southern Right Whale) birthing period. The whales, Karntubul and Wuuloc, are identified in the EP as sensitive receptors with dedicated protective measures. CGG confirms that these cultural and ecological sensitivities were incorporated into the environmental	EVT352

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		assessment. The EP acknowledges the sacred cultural status of Koontapool (Southern Right Whale) and Wuuloc (Pygmy Blue Whale) for the Gunditjmara people and includes them in impact and cumulative risk assessments. Appendix F3 references the Nyamat Mirring Plan 2023–2033 and recognises Gunditjmara spiritual connections, including to Karntubul. CGG substantively addresses the relevant issues, including underwater noise, vessel interactions, and cumulative effects. The EP sets out noise-management frameworks, timing restrictions, and cumulative impact analyses consistent with the concerns raised.	
4490	CGG has failed to adequately assess the impacts of its proposed activity on the Budj Bim World Heritage Cultural Landscape. GMTOAC further states that CGG did not sufficiently evaluate impacts on Kooyang, a culturally significant species whose lifecycle and migration underpin the world heritage values of the Budj Bim Cultural Landscape and extend well beyond its physical boundaries.	Culturally significant features, including the Budj Bim landscape, were included in both impact and cumulative risk assessments using a methodology that blends scientific evidence with cultural narratives. Regarding Kooyang (Eel), CGG maintains that this culturally important species, whose lifecycle is central to the world heritage values of Budj Bim, was addressed within the EP's impact and cumulative assessments. These assessments include both Kooyang's cultural significance and ecological role. CGG reiterates that its EP is consistent with statutory obligations, based on best-available science, and tailored to the cultural and ecological sensitivities identified. CGG maintains that the Budj Bim Cultural Landscape and Kooyang have been incorporated into the EP and that this inclusion meets regulatory standards for demonstrating ALARP and acceptable levels of impact.	EVT352

Annex 3

Fishery Overlap Data

Commonwealth Fishery	Maximum Area Fished Sqkm	Maximum Area Fished within Operational Area Sqkm	% Overlap
Bass Strait Central Zone Scallop Fishery (BSCZSF)	96,937	284	0.29
Eastern Tuna and Billfish Fishery (ETBF)	2,940,804	6,517	0.22
Small Pelagic Fishery (SPF)	450,951	544	0.12
Southern and Eastern Scalefish and Shark Fishery (SCDS)	292,871	6,801	2.32
Southern and Eastern Scalefish and Shark Fishery (SCTR)	590,033	6,801	1.15
Southern and Eastern Scalefish and Shark Fishery (SSKK)	532,091	6,801	1.28
Southern and Eastern Scalefish and Shark Fishery SSKN	606,740	6,801	1.12
Southern and Eastern Scalefish and Shark Fishery (SSCK)	700,405	6,628	0.95
Southern Squid Jig Fishery (SSJF)	341,052	6,801	1.99
Southern and Eastern Scalefish and Shark Fishery SCSQ	519,490	6,801	1.31
Western Tuna and Billfish Fishery (WTBF)	1,549,608	544	0.04

Victorian Fisheries

Fishery	Area Fished between Port Campbell and Passed Portland Sqkm	Area Fished between Port Campbell and Passed Portland within Operational Area Sqkm	% Overlap
Wrasse (Ocean) Fishery	2,155	135	6.26