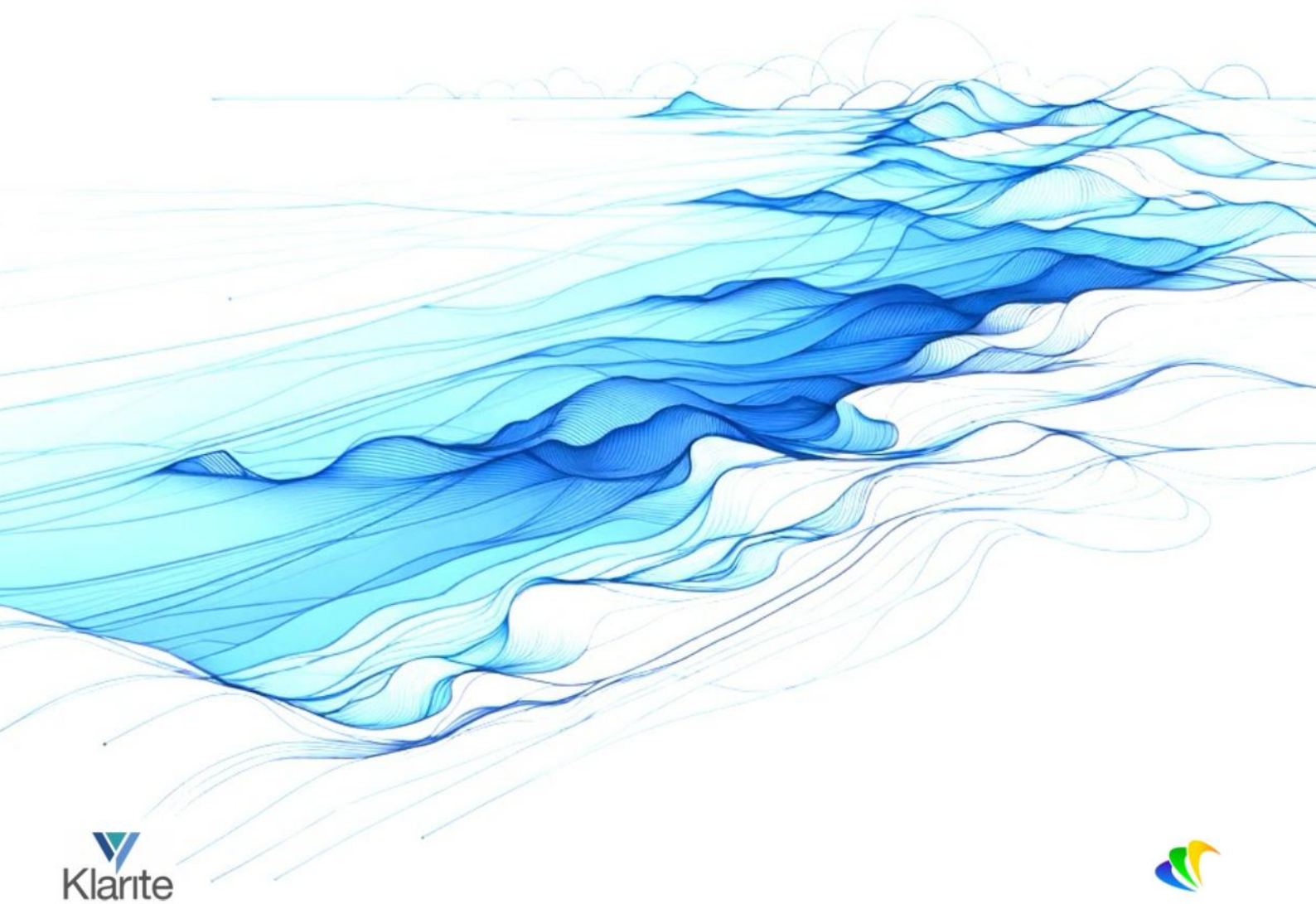
REGIA
Marine Seismic Survey

Fauna Management Plan

Appendix G2: REG-EP-036-G2

Rev 5

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1 Introduction

The purpose of this Fauna Management Plan (**FMP**) is to provide details about how the Regia Marine Seismic Survey (Regia MSS) will be carried out in a manner by which the environmental impacts from underwater sound and the risk of a collision to fauna will be reduced to as low as reasonably practicable (**ALARP**) and will be of an acceptable level.

This FMP is a control measure to manage impacts to fauna from the following environmental aspects associated with the Regia MSS:

- Vessel collisions with fauna
- Underwater sound emissions

This FMP will ensure that the Environmental Performance Outcomes (**EPO**s) from the Regia MSS Environment Plan (**EP**) relevant to fauna will be achieved.

1.1 Pre-Start Up Procedure

The following criteria must be met for commencing soft starts.

- Monitoring must be carried out, starting 24 hours prior to any start-up of the sound source during the day.
- A Soft start can only commence if there have been:
  - No detections of any whale within 2 km in the preceding 60 minutes.[1]
  - No detections of dolphins, pinnipeds, or turtles within 500m (except for bow riding dolphins).

CGG acknowledges that there are less methods available for marine mammal detection during hours of darkness and low visibility. The precautionary design of the pre-acquisition criteria has addressed the inability to acquire visual observations by MFOs during these times by integrating observations and detections over a longer period for SRW and BW.

1.2 Important Foundational Information

Several informative statements have been made in the development of this FMP as detailed below, to assist users in interpretation and implementation of the FMP. If any aspect of this FMP is unclear, users should consider these statements in determining what action, if any, to take.

1) At all times and without exception, the safety of personnel, other marine users and vessel management takes priority over the requirements described in this FMP.

2) Vessel Masters, CGG Site Representative, Party Chief and Survey Environment Adviser (**SEA**) will work together to minimise impacts to fauna in the context of safety requirements.

3) Conservatism has been built into how the Activity Action Zone (**AAZ**) and Shut Down Zone (**SDZ**) distances have been determined to address management of underwater sound emission risks taking account of detection accuracy, weather conditions, uncertainty in the impact assessment, and whale behaviour.

4) Acoustic modelling was undertaken for several different survey line locations, and several different underwater sound effect criteria were used to interrogate model outputs. The SDZ distances are based on the furthest distance to the underwater sound effect criteria from the acoustic modelling utilising revised survey layouts for the Regia MSS and species-specific behavioural characteristics (Vallarta & Eickmeier 2025).

[1] This precautionary design addressed the inability to visually observe whales by extending the visual observation window in the daytime to beyond typical dive times (~30 min) of deep diving species such as blue whales. The design of pre-acquisition criteria has also been expanded to address concerns and insights raised through consultation.

5) Policy Statement 2.1 details if the likelihood of encountering whales is low, the chance of a seismic survey having a significant impact on a whale species should be minimal, provided that the proponent and the operator of the seismic survey adopt the measures outlined in Part A: Standard Management Procedures.

While every attempt has been made to limit ambiguity in the FMP, if there is a lack of clarity, or residual uncertainty, about the instructions in this FMP users are required to take actions in a manner that manages impacts to fauna, are precautionary, and will ensure impacts and risks are within the defined acceptable levels specified in the Regia MSS EP.

2 Implementation

2.1 Roles and Responsibilities

Figure G2-1 shows the Regia MSS organisation structure relevant to the FMP with responsibilities for each role detailed in Table G2-1.

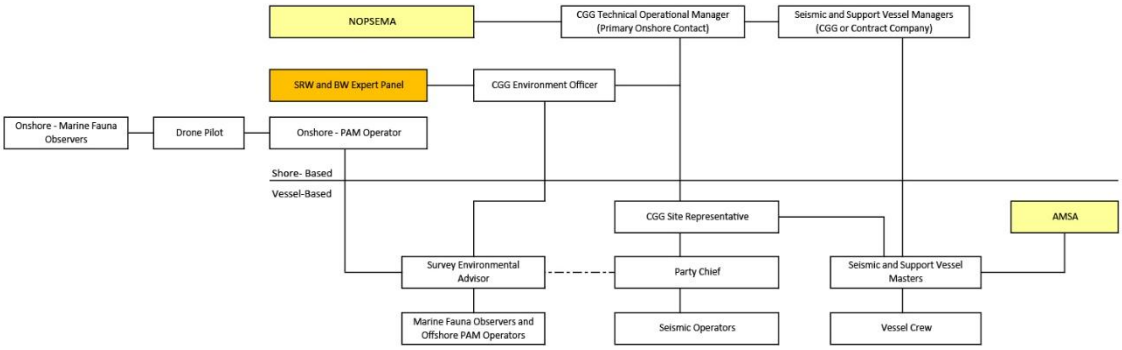


Figure G2-1: Regia MSS Organisation Structure Relevant to the FMP

Table G2-1 details the roles and responsibilities for the implementation of the FMP and details the records and reporting requirements.

Table G2-1 - Roles and Responsibilities for the FMP

Role	Responsibility
CGG Technical Operations Manager	Provide sufficient resources to implement the FMP.
CGG Environment Officer	Coordinate the SRW and BW Expert Panel and provide updates daily when SRW and BW detections and associated shutdowns occur.
	Develop the FMP Implementation Plan with input from SRW and BW Expert Panel, CGG Site Representative, SEA, Party Chief, MFOs, and PAM Operators.
	Collection and review of new relevant research, if any, will be completed within one month of the commencement of the Regia MSS. A risk assessment and management of change process will be instigated if outcomes of relevant research suggest that there has been a significant change to the context of the Regia MSS that may lead to an update to the FMP.
	Coordinate and document the review of effectiveness and compliance with the FMP.
	A review of the effectiveness and compliance with the FMP will be undertaken within one week of commencement of the Regia MSS and thereafter every four weeks while the Regia MSS is being undertaken.
	Ensure the Regia MSS induction provides an overview of the FMP.
	Review the FMP Daily Report to ensure detection and actions meet the requirements of the FMP.
	Provide support to the Survey Environment Adviser as required.
SRW and BW Expert Panel	Provide advice on the FMP Implementation Plan prior to commencement of the survey such that any recommendations can be adopted, as appropriate.

Role	Responsibility
	In considering the FMP Implementation Plan prior to commencement of the survey, the SRW and BW Expert panel will: Provide advice to optimise flight path and observer effort for detection of BW and SRW during aerial survey(s) to be instigated prior to commencement of the Regia MSS. Advise when aerial surveys are to be instigated during survey acquisition. Consider daily reports and monitoring of SRW and BW detections and associated shutdowns, if they occur, and recommend further management actions, as required. The panel will also help confirm the species of any 'unidentified whale' detections during the survey.
	Provide advice to CGG in relation to actions to take in connection with SRW and BW detections and associated shutdowns.
CGG Site Representative	Accountable for implementation of this plan.
	Provide records of FMP training and activity-specific environmental induction to SEA.
Survey Environment Adviser	Coordinate MFO, PAM and SSV observations/detections and provide advice to the Party Chief of required actions.
	Provide advice to the Party Chief and Vessel Masters (or delegate) on the requirements of the FMP.
	Develop daily FMP Report of MFO, PAM and SSV observations/detections and actions taken.
	Liaise with CGG Environment Officer to determine when aerial surveys are triggered and SRW and BW Expert Panel input required.
Party Chief	Maintain open communication with SEA.
	Communicate the status of the seismic activities (i.e. deployment, testing, soft start, shutdowns) to the SEA.
	Decide whether actions within the FMP can safely be implemented and act accordingly.
	Document reasons for not following the FMP Plan, if required.
	Provide input into the review of effectiveness and compliance with the FMP.
Drone Pilot in Command	Operate and manage all shore-based drone surveillance flights to detect, verify, and report Southern Right Whale presence in accordance with approved monitoring and safety protocols.
Vessel Masters	Maintain open communication with SEA.
	Decide whether actions within the FMP can safely be implemented and act accordingly.
	Document reasons for not following the FMP, if required.
	Provide input into the review of effectiveness and compliance with the FMP.
	Provide records of FMP training and activity-specific environmental induction for vessel crew to SEA.
Marine Fauna Observers (MFOs) **PAM Operators (Onshore and Offshore)**	Provide input into the development of the FMP Implementation Plan.
	Undertake observations/detections and immediately report whale and other fauna (MFO only) observations/detections to the SEA.
	Provide input into the review of effectiveness and compliance with the FMP.
	Submit daily reports to the SEA.
	Monitor data from SSV Buoys
Seismic Operators and Vessel Crew	Undertake Regia MSS induction that provides an overview of the FMP.
	Communicate whale sighting to SEA immediately, supported by relevant information where available (e.g. latitude and longitude, time of sighting, no. of whales).

2.2 Records and Reporting Requirements

Records and Reporting Requirement	Responsible	Description
Pre-Regia MSS FMP implementation review	CGG Environment Officer	Documentation and records of evidence of outcomes of engagement with the SRW and BW Expert Panel. Documentation and records of evidence to show that the FMP implementation requirements are in place prior to the commencement of the Regia MSS.
Regia MSS Induction records	CGG Site Representative Vessel Masters	Regia MSS induction records.
MFO and PAM operator qualifications	CGG Environment Officer	Resumes Training certificates
Communication of the FMP Plan to those who have responsibilities to implement the plan.	CGG Environment Officer	Signed record that roles responsible for implementation and actions in this plan have read and understand.
Daily observation/ detection report.	MFO PAM Operator	Report detailing marine fauna observations and whale detections taken as per the FMP, and reasons actions not taken.
Daily FMP Report	SEA	Report detailing marine fauna observations and whale detections and actions taken as per the FMP, and reasons actions not taken.
Review of effectiveness and compliance with the FMP	CGG Environment Officer	Documentation of efforts for collection and review of new relevant research. Documentation of risk assessment performed, and management of change process instigated, if any new research outcomes suggest that there has been a significant change to the context of the Regia MSS. Documentation of daily reports to the SRW and BW Expert Panel of SRW or BW observations and detections and associated shutdowns, if they occur. Documentation and any actions from the review of effectiveness and compliance with the FMP.
End of Survey Report	SEA	Report detailing marine fauna observations and whale detections, actions taken as per the FMP, and reasons actions not taken.
Compliance and Sighting Reports	SEA	Sightings and observations from all detection methods used as well as survey information are to be recorded within the DCCEEW Cetacean Sightings Application (CSA). Upon completion of the survey the information entered into the CSA is to be exported as a text file and provided to the CGG Environment Officer.
	CGG Environment Officer	Submit CSA text file to sightingsdata@aad.gov.au within two months of survey completion.

2.3 Detection and Observations Methods

Details of the detection and observation methods can be found in Section 9.3 of Appendix E7. In short, detections can occur from any of the following sources:

1. Seismic vessel
    a. Marine Fauna Observers
    b. PAM Detectors
    c. Officers of the Watch (verified by MFO/PAM Detector)
2. Aerial Drone Surveillance
3. Coastal Observers
4. Spotter vessel
    a. Marine Fauna Observers
    b. PAM Detectors
5. Other marine users
    a. Third parties with on-water activities (passing ships, petroleum titleholders, fishers)
    b. Offshore wind proponents with ADM technologies
6. State agencies/research institutions
    a. Arthur Rylah Institute – Citizen Science Program
    b. DEECA – Research programs
    c. Blue Whale Study
7. Local citizen science platforms

These multiple approaches provide extensive coverage for whale detections out to the required ranges.

3 Protection Procedures – At Sea

In the context of the Regia MSS, it is acknowledged that there are inherent challenges in detecting whales. Given the range of species, behaviours, and habitats, it requires a multifaceted approach.

These procedures apply to all marine mammals, however specific measures relating to sound and BWs and SRWs are discussed in Section 4 and Section 5.

Unless otherwise stated, all low frequency cetacean detections are assumed to be either a SRW or BW until confirmed otherwise, and the below procedures applied accordingly.

3.1 Start Up Procedures

A soft start will be implemented in the following circumstances:

1. When the sound source is turned on initially once all pre-start up criteria have been met.

   This type of soft start gradually increases the seismic source over a 30-minute period. It is anticipated that during this period mobile species including dolphins, seals, and turtles will move away from the sound source before it is at full power, providing them a level of protection. Once the source passes, animals will be free to move back into the habitat that they departed from.

2. When the sound source is in low power mode due to the presence of medium to large flocks[2] of foraging birds[3] within 500 m of the sound source.

3. When the sound source is in low power mode during line turns or otherwise transiting the Operational Area.

3.2 Start Up Delay Procedures

- If medium to large flocks of foraging birds is detected within 500 m of the sound source during the soft start procedure, the acoustic source will be set to low power mode and will not be ramped up until all pre-acquisition criteria have been met again. [Paragraph added in response to Matter B15].
- If any whale is detected in relevant SDZs during soft start procedures, the acoustic source will be shut down, and another soft start cannot commence until all pre-acquisition criteria have again been met.

3.3 Operating Procedures

- No vessel is permitted to operate at speeds of more than 6 knots during normal acquisition operations, to reduce the risk of vessel collision to whales.
- If a whale approaches within 300m of any vessel, the vessel must:
  - Reduce speed and maintain at least 300 m from the whale.
  - Position vessel to not impede the path of the whale.
  - Avoid sudden changes in speed or direction.
  - Communicate the sighting to the SEA and other vessels.
- If a dolphin, pinniped, or turtle approaches within 150m of any vessel, the vessel must:
  - Reduce speed and maintain at least 150 m from the dolphin, pinniped or turtle.
  - Position vessel to not impede the path of the dolphin, pinniped or turtle.

[2] There is no set number of birds that constitutes a flock. For the purposes of mitigating impacts/risks to all foraging birds, a small flock is considered a group of less than 20 birds, a medium flock a group of 20 to 100 birds and a large flock a group of over 100 birds. Mitigations should consider medium to large flocks of birds to minimise potential for negative impacts to occur. These impacts could include alterations to resting regime, alterations to foraging success, collision, alterations to group cohesion.

[3] Foraging, as it relates to birds, includes bird species participating in feeding behaviours such as plunging and diving.

- Avoid sudden changes in speed or direction.
- Communicate the sighting to the SEA and other vessels.

Figure G2-2 details the observation and detection distances for each observation and detection method. This approach ensures that information on the presence of whales and other species can be obtained at relevant distances. Figure G2-2 also illustrates deployment of aerial surveys that may provide additional information on the movement of SRW into and out of reproduction BIA and BW into and out of the Otway Region.

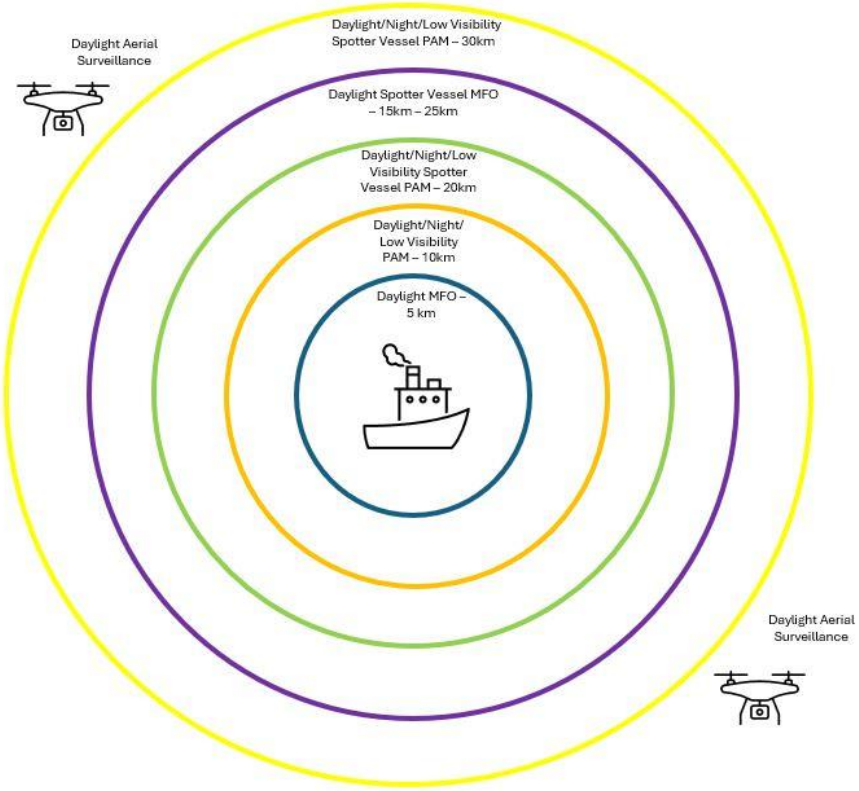


Figure G2-2 - Observation and Detection Zones

3.4 Shut Down Procedure

Once the seismic source is at full power, shut down of the sound source must occur if:

- Medium to large flocks of foraging birds are observed by the Marine Fauna Observer within 500 m of the source. Start-up procedures can commence when the seismic source is > 500 m from medium to large flocks of foraging birds.[4]
- Any pinniped, dolphin, or turtle is detected within 500 m of the source (except for bow riding dolphins).[5]

[1] Based on modelled PTS SEL24 distance for LF-cetaceans.

[4] This measure has been adopted to protect foraging penguins and other diving birds following consultation.

[5] Based on previous seismic surveys, CGG has chosen to only implement a shutdown zone and not a low power zone to provide another level of protection to all whale species. This is based on the low power zone for whales as detailed in the EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales (Policy Statement 2.1).

- Any whale[6] is detected within 2 km of the sound source.
- Any LF cetacean is detected within 9 km of the sound source[1]

3.5 Night-time and Low-Vis Procedures

At night-time or at other times of low visibility, the following measures apply for start-up and operations:

- **Start-up** may commence as per the Soft-Start Procedure if there have not been 3 or more whale instigated shut-down situations during the preceding 24-hour period.
- **Operations** may proceed if there have not been 3 or more whale instigated shut-down situations during the preceding 24-hour period.

3.6 Helicopter Operation Procedure

Helicopters will not fly lower than 1650 ft when within 500 m horizontal distance of a cetacean except when landing or taking off and will not approach a cetacean from head on.

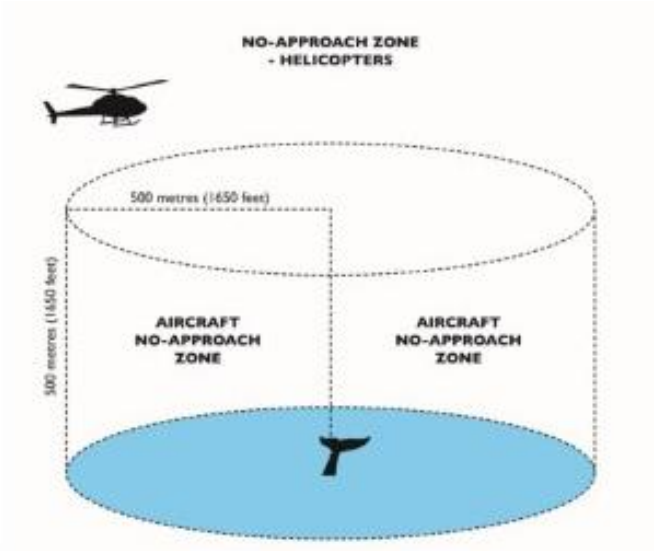


Figure G2-3 – Cetacean Approach Distances for Helicopters

3.7 End-of-Survey Procedure

The survey must stop if any of the following criteria are met:

- The activity started 90 days prior.

[6] As per Policy Statement 2.1 'Whales' includes baleen whales and larger toothed whales, such as, sperm whales, killer whales, false killer whales, pilot whales and beaked whales.

4 Protection Procedures – SRW Reproduction BIA

Pre-survey Procedures – Onshore MFOs and Drone Pilots in Command (PICs)

- Recruit, train, and brief all MFOs and PICs in SRW identification, behaviour recognition (especially mother–calf pairs), and use of optical equipment.
- Confirm observation sites along the coastline, ensuring safe access, unobstructed views, and coverage of key vantage points (e.g., Logan's Beach Whale Nursery, The Crags, Portland headlands).
- Calibrate and test equipment: binoculars, rangefinders, cameras, tablets/logbooks, and GPS units.
- Develop daily observation schedule and flight plans to ensure consistent coverage during daylight hours.
- Conduct trial observation days under different weather conditions to test protocols, and sighting forms.
- Establish clear reporting protocols for relaying sightings to the Survey Environment Adviser, including format, frequency, and escalation triggers.
- Establish contact with regional stakeholders, including DELWP, local whale groups, and other for data-sharing.
- Prepare guidance materials for field staff, including identification aids, behavioural cues, and reporting templates.

4.1 September Procedures – Onshore MFOs, PIC, and Onshore PAM Operators

- Conduct daily land-based observations and drone flights across designated coastal points.
- Communicate with and notify the Survey Environment Adviser immediately of any SRW sightings within the BIA as this will instigate a shutdown of the sound source.
- If an individual SRW or a SRW calf-cow pair is detected, record all sighting data, including:
  - Time, date, and location.
  - Group composition (e.g., mother and calf, lone adult).
  - Estimated distance from shore.
  - Behavioural state.
  - Environmental conditions (sea state, visibility).
- Note any observational limitations due to weather or sea state in daily logs.
- Track movement patterns to assess use of the BIA.
- Submit daily summary reports to the Survey Environment Adviser including full sighting and flight logs and absence confirmations.
- Participate in scheduled coordination briefings with marine fauna observers on the survey and spotter vessel to align detection data and mitigation responses.
- Ambient sound data from the SSV buoys will be monitored for any exceedances of impulsive noise over the 120 dB threshold.[7]

4.2 October Procedures – Onshore MFOs, PICs, and Onshore PAM Operators

SRWs have not been observed in the monitoring zone in October in any of the last 6 years however we recognise that does not mean SRW may not utilise the reproduction BIA in October and as such further observations to confirm presence/absence are required. However, the nature of the observer effort changes to reflect what the data indicates.

[7] The definition of exceedances can be found in Appendix G6.

The daily procedures in October are:

- Continue daily observation effort and drone surveillance with sufficient intensity to confirm presence or absence.
- Report any SRW sighting immediately to the Survey Environment Adviser, as this will instigate a shutdown of the sound source.
- If a SRW or SRW calf-cow pair is detected, record all sighting data, including:
  - Time, date, and location.
  - Group composition (e.g., mother and calf, lone adult).
  - Estimated distance from shore.
  - Behavioural state.
  - Environmental conditions (sea state, visibility).
- Use sighting trends from September to identify date thresholds for likely BIA departure.
- Continue daily logs, including 'no sightings' confirmations, environmental conditions, and any relevant incidental observations.
- Ambient sound data from the SSV buoys will be monitored for any exceedances of impulsive noise over the 120 dB threshold. In October, if there have been 14 consecutive days without a confirmed SRW detection, the shutdown trigger for repeated impulsive-noise exceedances increases to 140 dB SPL.
- Compile end-of-season summary report detailing observations, timing of departure, and any recommendations for future surveys.

4.3 SRW Spotter Vessel Procedure

This procedure governs the spotter vessel movements for monitoring SRWs and will be implemented from 16 September to 31 October. There are two modes for spotting:

Scouting Mode

The spotter vessel conducts reconnaissance 10[8] km ahead of the survey vessel before commencement of the survey and each line turn.

The spotter vessel is deployed at least 120 minutes before the survey vessel commences a new survey line.

The spotter vessel moves systematically up to 10[9] km ahead of the survey vessel and patrols areas adjacent to the Active Source Area along the expected line of travel of the survey vessel.

SRW Sentry Mode

The spotter vessel maintains a position adjacent to the SRW BIA to maximise SRW detection capabilities. This allows for proactive implementation of mitigation measures to minimise potential impacts to SRW when they are utilising the reproduction BIA. The spotter vessel will travel parallel to the seismic vessel, 20km away and on the shoreside of the seismic vessel, while it is acquiring lines 31-67 (Figure G2-4).

[8] The 10km separation distance while in Scouting Mode allows the spotter vessel to clear the first 20km (10km range of PAM on both seismic and spotter vessel) of the survey line, thus reducing the chance that a whale re-enters the previously cleared mitigation zone during the transition.
[9] The 20 km separation distance is informed by the performance of the PAM systems installed on both the seismic and spotter vessels, each capable of detecting whales at ranges of ~10 km. By positioning the spotter vessel 20 km away from the seismic vessel, CGG maximises combined detection coverage and enhances the likelihood of detecting Southern Right Whales.

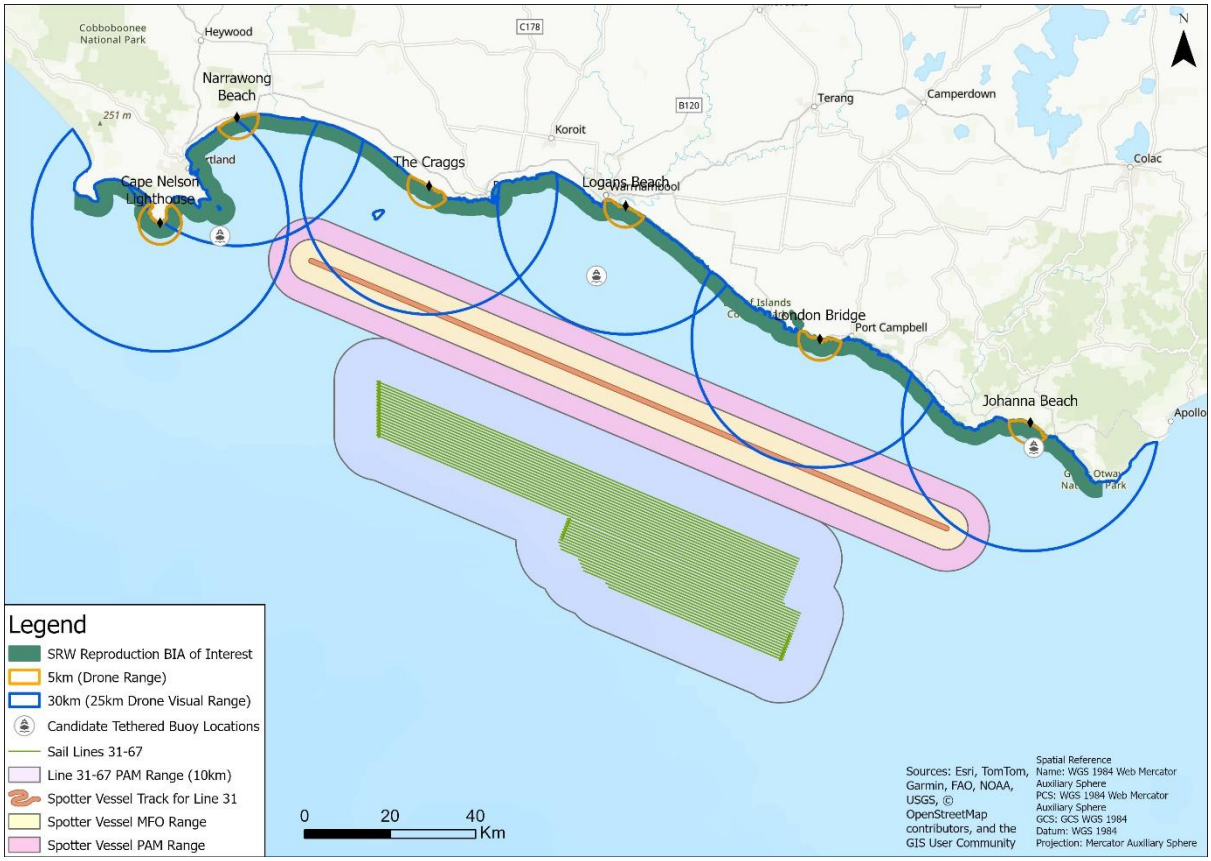


Figure G2-4 – Detection Capability for SRWs in September and October

4.4 Night-time and Low-Vis Procedures

If there is a confirmed SRW detection at night, the sound source will be shut down until daylight.

4.5 Detection Shutdown and Restart Procedures

This procedure applies from 16 September to 31 of October.

- Shutdown the sound source for 24 hours if:

  There is any confirmed[10] detection of a SRW (visual or acoustic from any detection platform) within the SRW Shutdown Area (See Figure G2-5); or
  There are any exceedances of impulsive noise over 120 dB SPL detected from the SSV buoys, and the survey is acquiring at full power in September. In October, if there have been 14 consecutive days without a confirmed SRW detection, the shutdown trigger for repeated impulsive-noise exceedances increases to 140 dB SPL.

10 A "confirmed detection" is a detection from any platform or program verified by a qualified MFO, an expert scientist in the field, or from photographic evidence that has been time and date stamped.

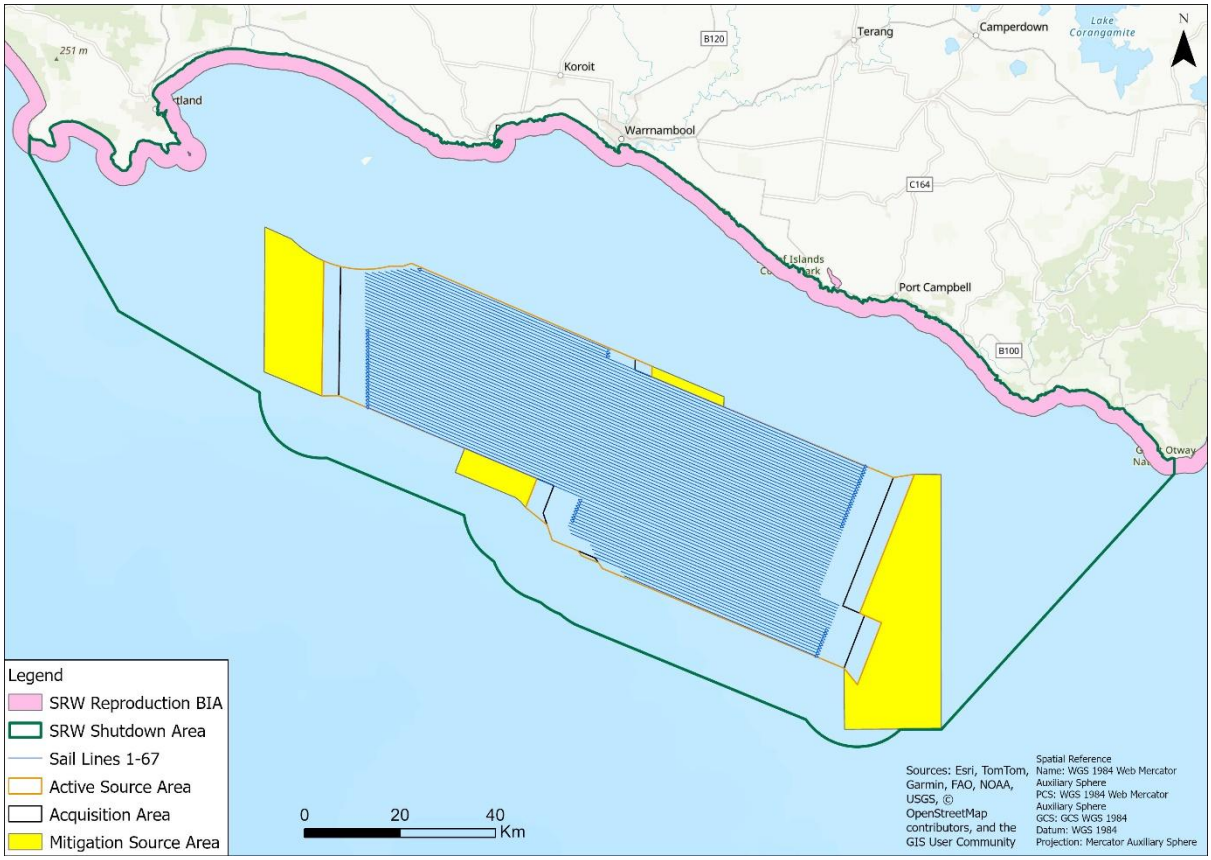


Figure G2-5 - SRW Shutdown Area

The restart protocol can only be initiated if:

- There have been no confirmed detections of any SRW from all the platforms for a period of 24 hours; and/or
- The seismic vessel has relocated; and/or
- There are no exceedances of impulsive noise above the 120 dB ultra conservative threshold from monitoring the SSV buoys during the soft start. The restart protocol will include the following procedures:

The SRW restart protocol:

- T-90 minutes: the spotter vessel will start a pre-clearance detection survey of the line; the spotter vessel will be 20 km ahead of the seismic vessel.
- T-60 minutes: the MFO's and PAM operators on the vessel will start a pre-clearance detection survey
- T-30 minutes: the soft start can commence, and the spotter vessel can resume its position, 20km away and on the northerly side, while it is acquiring lines 31-67.

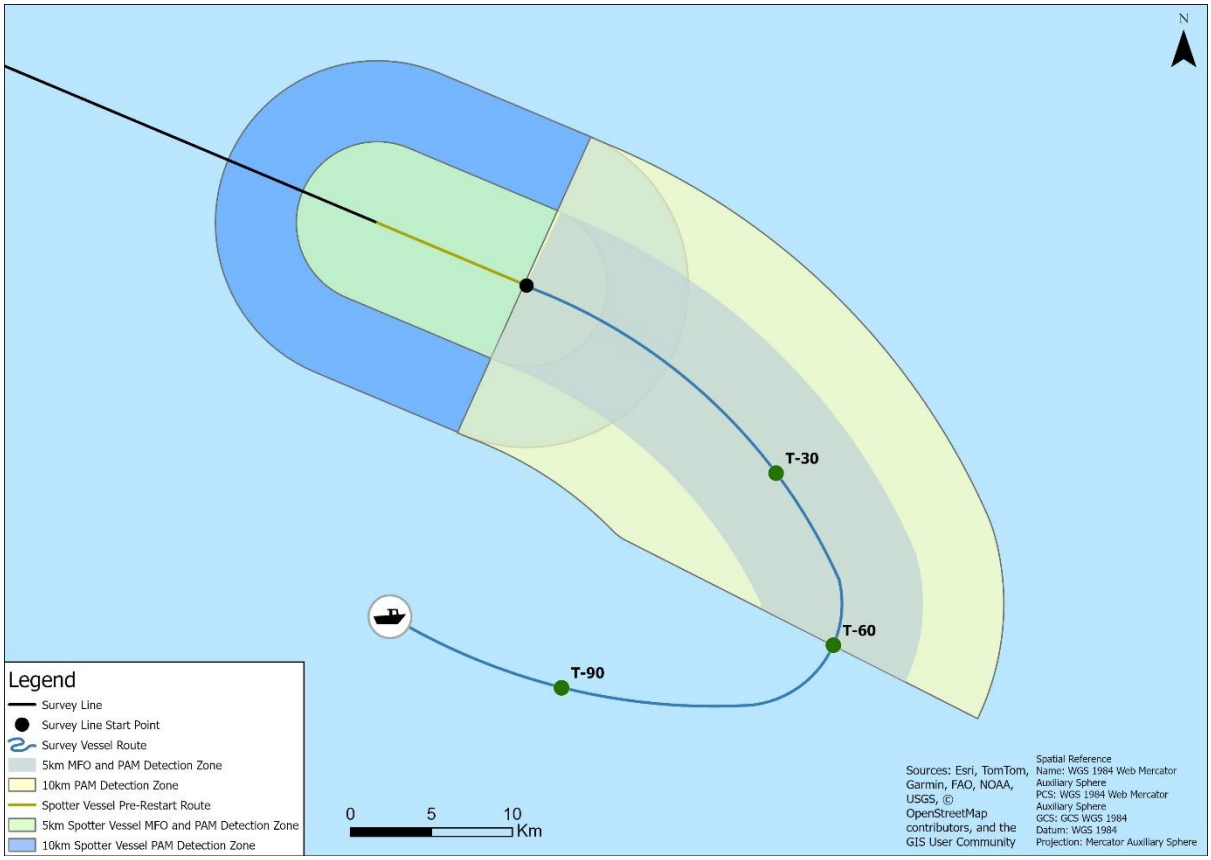


Figure G2-6: Restart procedure for SRW in September and October.

5 Protection Procedures – BW Foraging BIA

5.1 Pre-BW Season Drone and Coastal Monitoring (End of October)

One drone aerial surveillance flight will be conducted from Cape Nelson to try and detect any early arrivals of BWs into the Foraging BIA. Cape Nelson has been chosen as sighting databases indicate BWs pass by Cape Nelson when moving into the BIA.

5.2 1st November –31st December Detection Procedures

BW abundance data indicates initial feeding occurs in South Australian waters and move eastwards throughout the summer months. The BW detection measures have been designed with this in mind and to maximise all possible chances of BW detections.

Detection procedures for BWs include:

- Positioning the spotter vessel on Blue Whale Sentry Mode where the vessel will maintain a position 20 km[11] to the west of the survey vessel (see Figure G2-7 below)
- PAM and MFOs on board both the spotter and survey vessels.

5.3 BW Spotter Vessel Procedure

This procedure governs the spotter vessel movements for monitoring BWs and will be implemented from 1 November to 31 December. There are two modes for spotting:

Scouting Mode

The spotter vessel conducts reconnaissance 10 km[12] ahead of the survey vessel before commencement of the survey and each line turn. The spotter vessel is deployed at least 120 minutes before the survey vessel commences a new survey line.

The spotter vessel moves systematically up to 10km ahead of the survey vessel and patrols areas adjacent to the Active Source Area along the expected line of travel of the survey vessel.

Blue Whale Sentry Mode

The spotter vessel maintains position 20 km[11] to the west of the survey acquisition area because blue whale abundance data shows an initial tendency for foraging to occur in South Australian waters and move eastward throughout the summer months. Therefore, it is more likely that the survey will encounter blue whales on its western flank, and if the spotter vessel is in either mode, it would be positioned on the eastern side of the survey and is less likely to encounter blue whales (Figure G2-7).

[11] The 20 km separation distance while in Sentry Mode is informed by the performance of the PAM systems installed on both the seismic and spotter vessels, each capable of detecting whales at ranges of ~10 km. By positioning the spotter vessel 20 km away from the seismic vessel, CGG maximises combined detection coverage and enhances the likelihood of detecting Blue Whales.

[12] The 10 km separation distance while in Scouting Mode allows the spotter vessel to clear the first 20km (10km range of PAM on both seismic and spotter vessel) of the survey line, thus reducing the chance that a whale re-enters the previously cleared mitigation zone during the transition.

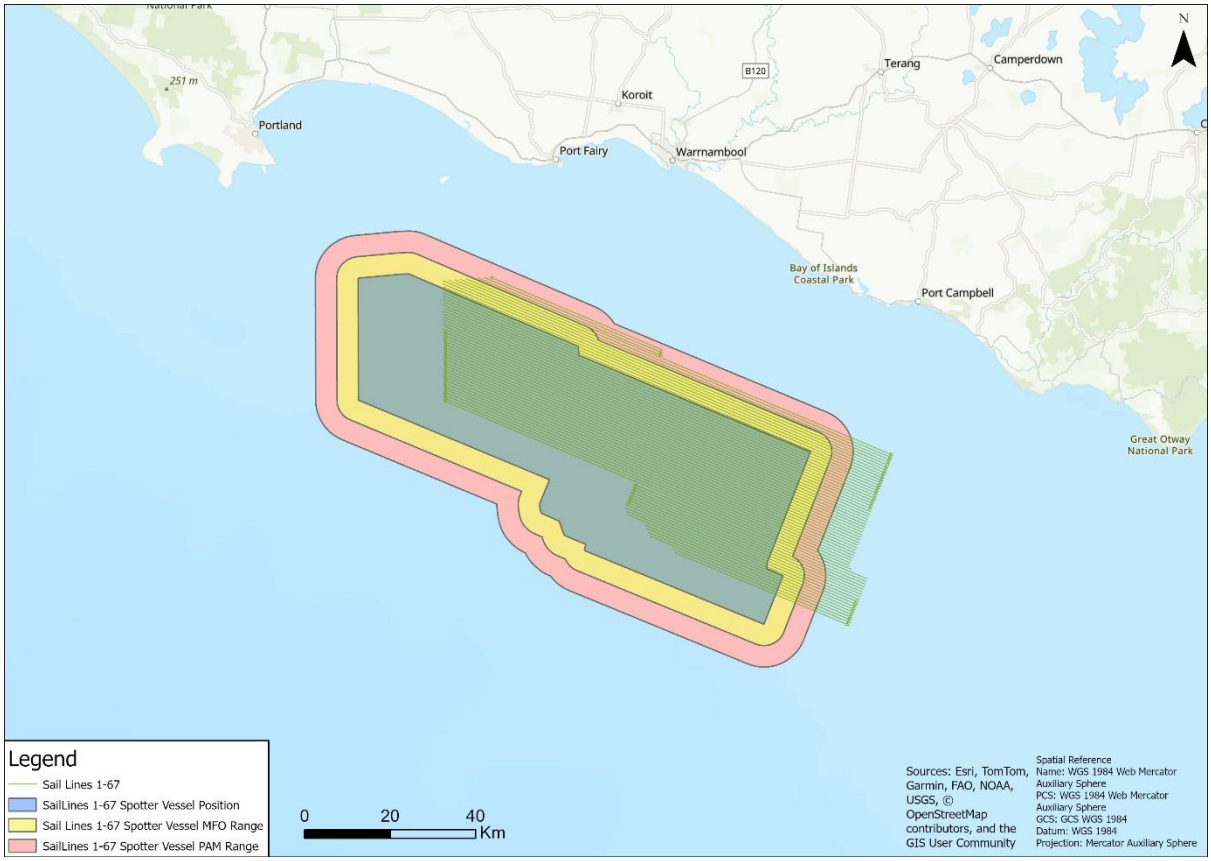


Figure G2-7 – Detection Capability for BWs in November and December

5.4 Night-time and Low-Vis Procedures

If there is a confirmed blue whale PAM detection within 5 km at night, the sound source will be shut down until daylight.

5.5 Shutdown and Restart Procedures

Once the seismic source is at full power, the sound source will be shut down for one hour [13] if:

- A Blue Whale is detected within 5 km (the TTS SEL distance) of the sound source.
- A Blue Whale is detected within 5 km (160 dB behavioural SPL distance) of the sound source.

If there is a PAM detection at night, the sound source will be shut down until daylight.

If there is an "unidentified baleen whale" within 5 km of the seismic source, this will trigger a shutdown for one hour, or until daylight if at night. Attempts will be made to identify the baleen whale, and if the individual is confirmed not to be a BW, restart procedures can commence immediately, provided all other restart measures have also been met.

The restart protocol can only be initiated if:

- there have been no confirmed detections of any BW from all the platforms for a period of one hour.

The BW restart protocol will include the following procedures:

- T-90 minutes: The spotter vessel will be 10km ahead of the seismic vessel.

[13] One hour is based on Policy Statement 2.1 which states shut down may last 30 minutes, CGG has adopted a more conservative approach extending the 30-minute shutdown to 1 hour.

- T-60 minutes: the MFO's and PAM operators on the vessel will start a pre-clearance detection survey
- T-30 minutes: the soft start can commence, and the spotter vessel transitions to sentry mode (20km due West of the survey vessel) (see Figure G2-8 below)

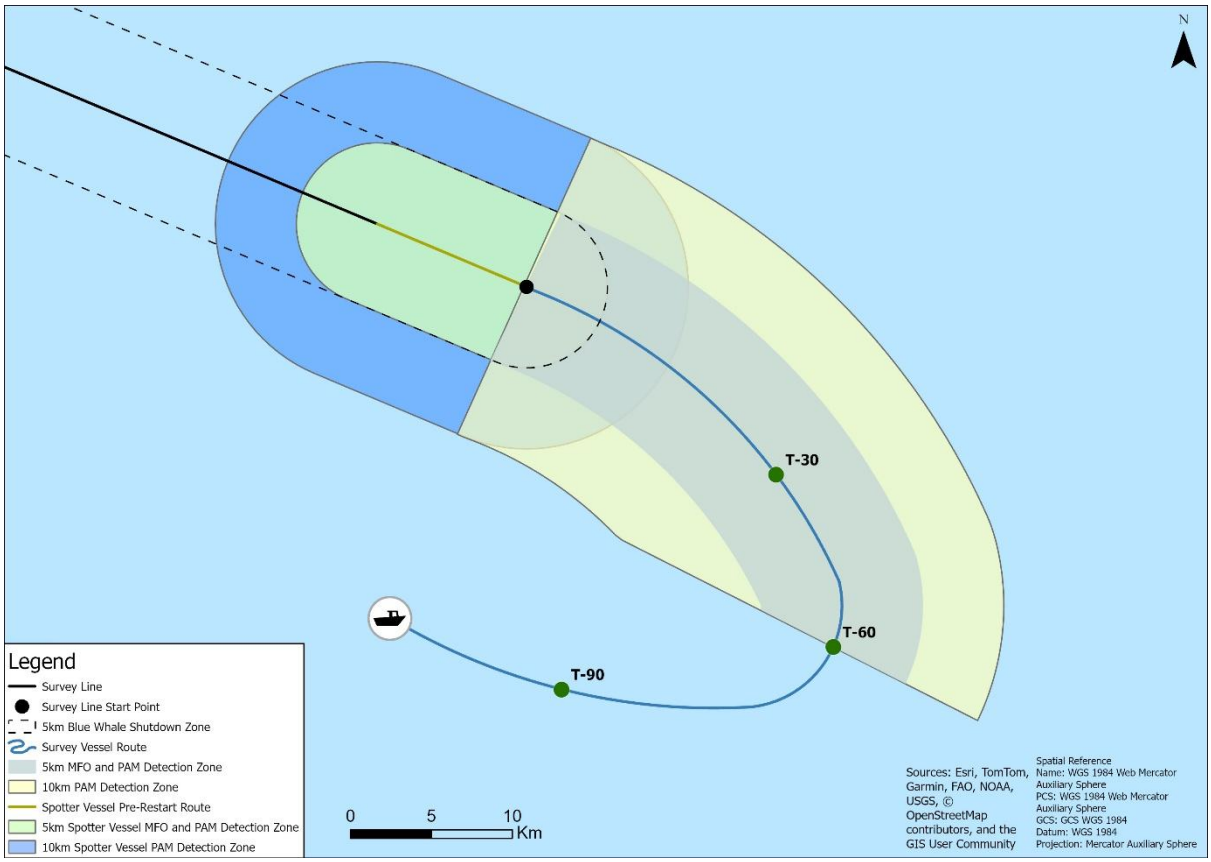


Figure G2-8: Restart procedure for BW in November and December.

6 Document Control

Version	Date of Revision	Author/Reviewer	Summary of Changes
0.0	2 November 2023	MS	Document created.
0.1	19 Novmber 2023	SJ	Updates to include all fauna, not just marine mammals.
0.2	2 January 2024	SJ	Updated following completion of assessments.
1	5 January 2024	MS	Accepted all tracked changes and formatted for public comment.
1.1	10 May 2024	CT/KC	Rework of document to ensure alignment with outcomes of the consultation process, public comment, and the updated environmental assessments.
2	14 May 2024	MS	Review and update ready for resubmission.
3	28 October 2024	MS/CT	Updated following NOPSEMA assessment.
4	12 April 2025	MS/CT	Updated following NOPSEMA, review and update of E7 & F3, and inclusion of protection procedures for the SRW reproduction BIA.
5	10 December 2025	CT/RH/EO/AH/MS	Updated following NOPSEMA OMR #2 and consequential changes.

7 Glossary of Acronyms and Terms

Acronym or Term	Description
Acoustic detection	Detection of whales via in water systems such as: • Passive acoustic monitoring (PAM) • Acoustic detection monitoring (ADM) on gliders or fixed buoys
ADM	Acoustic Detection Monitoring
ALARP	As Low As Reasonably Practicable
AAZ	Activity Action Zone
BW	All blue whale sub-species, pygmy blue whales, and Antarctic blue whale.
Cetaceans	Whales and dolphins.
Detection	Detection is used to mean detection of whales which may occur via MFO observation or via acoustic detection methods.
EP	Environment Plan
EPO	Environmental Performance Outcome
FMP	Fauna Management Plan
MFO	Marine Fauna Observer
PAM	Passive Acoustic Monitoring
PIC	Pilot in Command
Policy Statement 2.1	EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales
PTS	Permanent Threshold Shift
Regia MSS	Regia Marine Seismic Survey
SDZ	Shut Down Zone where the seismic source will be shut down.
SEA	Survey Environment Adviser
SRW	Southern Right Whale
Soft start	Gradually bringing on each acoustic source over a 30 min period.
SSV Buoy	Sound Source Verification Buoy
TTS	Temporary Threshold Shift

8 References

Koessler MW, Muellenmeister AM, Connell SC & McPherson CR. (2023). Regia Marine Seismic Survey: Initial Acquisition Area. Initial Acquisition Area. Document 03076, Version 1.0. Technical report by JASCO Applied Sciences for Klarite.

Stephen T.J., V.E. Warren, S.C. Connell, M.W. Koessler and C.R. McPherson. (2024). Regia Marine Seismic Survey: Acoustic Modelling for Assessing Sound Exposures. Document 03301, Version 2.0. Technical report by JASCO Applied Sciences for Klarite.

Vallarta, J. & Eickmeier, J. (2025). Regia Marine Seismic Survey in the Otway Basin. Revision 1. Technical report by SLR Consulting (Canada) Ltd for Klarite.

Annex 1: Blue Whale Diving Summary

Diving behaviour of blue whales associated with feeding at depth was observed by Gill and Morrice (2003) in the Otway region, who note that blue whales dived steeply, submerging for 1 – 4 minutes, then returned to the surface. Tagging of a pygmy blue whale at the Perth Canyon identified 1677 dives over the tag duration (7.6 days) (Owen et al. 2016). The duration of dives was:

- Feeding - mean of 7.6 minutes, maximum of 17.5 minutes.
- Migratory – mean of 5.2 minutes, maximum of 26.7 minutes.
- Exploratory – mean of 8.6 minutes, maximum of 22.05 minutes.

Tagging of 13 pygmy blue whales (five of which had tags that monitored dive depth and duration) in the Bonney upwelling identified (Möller et al. 2020):

- Whales predominantly carried out area-restricted search (presumably foraging) with generally shallow and short dives. However, dives were generally deeper at night compared to during the day.
- Whales performed mostly square shaped dives that were shallow in depth and short in duration.
- Dives recorded to a maximum of 492 m (mean = 59.5 m ± 94.3), and for a maximum duration of 112 minutes (mean = 6.1 minutes ± 5.2).

Although the maximum recorded dive time was 112 minutes, the mean dive time of 6.1 minutes ± 5.2 provides confidence that the typical dive time is less than 30 minutes (Möller et al. 2020). Tagging of eight blue whales off California (Irvine et al. 2019) identified that dive durations were as long as 30.7 minutes, and no feeding lunges were recorded during dives > 20 minutes in duration.

References:

Gill, P. and M. Morrice. 2003. Cetacean Observations. Blue Whale Compliance Aerial Surveys. Santos Ltd Seismic Survey Program Vic/P51 and P52. November – December 2002. Report to Santos Ltd.

Irvine, L.M., D.M. Palacios, B.A. Lagerquist, and B.R. Mate. 2019. Scales of Blue and Fin Whale Feeding Behaviour off California, USA, With Implications for Prey Patchiness. Frontiers in Ecology and Evolution 7(338).

Mölle LM, Attard CRM, Bilgmann K, Andrews-Goff V, Jonsen I, Paton D and Double MC. 2020. Movements and behaviour of blue whales satellite tagged in an Australian upwelling system. Scientific Reports 10:21165.

Owen. K., Jenner CS., Jenner. M-NM. And Andrews. RD. 2016. A week in the life of a pygmy blue whale: migratory dive depths overlaps with large vessels draft. Animal Biotelemetry. 4:17. DOI 10.1186/s40317-016-0109-4.

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 G2-2. If an objection or claim had merit and was relevant to this assessment it has been included in the table below.

Table G2-2 - Objections and Claims raised from consultation

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
4016	Pygmy blue whales migrate out of the area from April to June and return in November to December, remaining in the Portland detection area until mid-June each year (McCauley et al. 2018). The timing of the proposed seismic survey overlaps with the migration periods of these endangered whales. Mitigation measure M#01 states that seismic operations will only occur in the pygmy blue whale foraging Biologically Important Area (BIA) when "low numbers of PBWs and other foraging whales are present," specifically during April, May, and June or September, October, and November. AMCS argues that this contradicts findings from McCauley et al. (2018) and Moller et al. (2020), which indicate that pygmy blue whale presence primarily occurs from January to April, with potential activity as early as October and lasting until June. Data from tagged whales in 2015 showed use of continental shelf areas from January to July. AMCS requests that CGG provide clear and comprehensive information on how the proposed activities will minimize interactions with and harm to migrating whales during their presence in the area.	CGG will adopt a monitoring program (see Appendix G2) to be able to detect baleen whales. One of the aims of the monitoring program will be to detect either the departure or arrival of blue whales and southern right whales into their respective biologically important areas (depending on the seasonal window). As per Policy Statement 2.1, there will be a threshold set to provide clarity about when the survey can or cannot start to acquire data and when it would need to stop. The monitoring program and threshold criteria will be structured to reflect the interannual variation of PBW presence in their foraging area. This measure will ensure there the activity is consistent with the respective management plans for these whales.	5040
4048	Concern about sustained noise impact on cetaceans in the area.	CGG has conducted a thorough impact assessment relating to underwater sound and marine mammals, with mitigation measures and management adopted as a result of both this assessment (which includes relevant marine mammal species) (Appendix E7) and a further assessment (which includes two key whale species: Blue Whale and SRW) (Appendix F3). A	1835

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		comprehensive fauna management plan was also established as part of this EP development (Appendix G2).	
4050	Concern about the destruction of smaller sealife and the wounding of larger marine animals due to seismic blasting.	Regia EP has conducted thorough assessments of the literature for all relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals. 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 relevent mitigation measures are outlined in the EP.	1669
4053	Concern about the impact on marine creatures due to noise pollution from seismic surveys.	The titleholder acknowledged the feedback, noting that potential impacts from underwater sound to relevent receptors, including plankton, fish, invertebrates, birds, turtles, and marine mammals, are assessed in the Environmental Plan (EP) and can be found in Appendices E2, E3, E4, E5, E6, and E7. Measures to minimise adverse impacts on biological receptors are outlined in the EP also, and can be found in Appendix G2.	3237
4055	Concern about the impact on shearwater birds and their breeding ground at Griffith Island.	Titleholder has conducted a thorough assessment of the literature, with potential impacts to birds assessed in the Environmental Plan (EP) (Appendix E5). Measures to minimise potential adverse impacts birds are also outlined in the EP (Appendix G2).	2908
4058	Concern about the mass destruction the blasting will cause to local sea animals, particularly mentioning the Southern Right Whales that migrate to Warrnambool every year to give birth.	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 Southern Right Whales, within the area of operation. A fauna management plan, along with a suite of measures are also in place to reduce any impacts to as low as practicable.	886
4063	Concern for various birds and little penguins and the effects of sound and light.	Impacts from underwater sound and artificial light on birds, including little penguins, are assessed in the Environmental Plan (EP) and can be found in Appendices E5 and E9. Further assessment of little penguins was also undetook by CGG to demonstrate that environmental impacts and risks arising from the activity will be of an acceptable level. Measures to minimise	1783

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		adverse impacts on birds in the region are also outlined in the EP.	
4096	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 relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals, in relation to underwater sound and artifical 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 relevent mitigation measures are outlined in the EP.	2766
4106	Feedback raises concern for the welfare of whales that come to calve in local waters, emphasising the need to consider the impact of proposed activities on these vulnerable marine animals.	We will not survey while SRW mothers and calves are in the area. Oil and gas has successfully co-existed with wildlife in this area for 25 years and we are doing everything we can do protect the wildlife and natural beauty of the area (Event ID 1781).	1781
4118	Impact on marine animals, which are the livelihood of the community.	Regia EP has conducted thorough impact assessments for all relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals. The Regia MSS will not impact the population stability of any taxa within the area of operation. Measures to minimise adverse impacts on relevant biological receptors in the region and relevent mitigation measures have been outlined in the EP.	2274
4133	Mass destruction of marine populations through the blasting process.	Regia EP has conducted thorough impact assessments for all relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals. The Regia MSS will not impact the population stability of any taxa within the area of operation. Measures to minimise adverse impacts on relevant biological receptors in the region and relevent mitigation measures have been outlined in the EP.	2274
4135	Mention of being heavily impacted by the whales in the tourism industry.	Title holder has undertaken a thorough analysis and assessment of all relevant literature related to Marine Mammals to inform its decisions. The MSS will not	1244

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		impact the population stability of marine mammals within the area of operation. Mitigation plans are also in place to reduce any impacts to as low as practicable.	
4140	No mention of ceasing activities when whales are present in the area.	CGG has conducted a thorough impact assessment relating to underwater sound and marine mammals, with mitigation measures and management adopted as a result of both this assessment (which includes relevant marine mammal species) (Appendix E7) and a further assessment (which includes two key whale species: Blue Whale and SRW) (Appendix F3). A comprehensive fauna management plan was also established as part of this EP development (Appendix G2).	1835
4146	Opposes seismic testing, claiming it will have catastrophic effects on marine life due to high-decibel blasting sounds. States activities can harm various marine species and may cause whales to beach themselves from the pain, making them unacceptable in a whale sanctuary 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. Regia EP has found seismic impacts to cetaceans can be mitigated and managed through appropriate timing of the survey and a comprehensive fauna management plan	537
4206	Stakeholder raised concerns about the number of planned overflights stating that 12 was insufficient	CGG has revised it's commitment to only 1 aerial surveillance flight as a minimum, there may be up to 10 but the need will be established by the Whale Expert Panel.	3783
4231	The feedback expresses concern that the project might disrupt blue whale migration, movements, and natural behavior due to potential interference in their habitat.	The effects of underwater sound have been extensively assessed based on the latest scientific literature. CGG has committed to a variety of protective measures for blue whales and an extensive detection area. These measures have been assessed in Appendix E7, F3 and G2.	2081
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
4270	The stakeholder asserts seismic surveying has been proven to be harmful and disruptive to marine life of many species.	Regia EP has conducted thorough impact assessments for all relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals. The Regia MSS will not impact the population stability of any taxa within the area of operation. Measures to minimise adverse impacts on relevant biological receptors in the	3343

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
		region and relevent mitigation measures have been outlined in the EP.	
4306	The stakeholder was concerned about potential negative impacts of gas exploration and development on Country, the marine and coastal environment, the local economy, Traditional Owners, and local communities.	The titleholder acknowledged the feedback, noting that all relevant impacts are assessed in the Environmental Plan (EP) and can be found in Appendices E1-E9. Measures to minimise adverse impacts on functions, interests and activities on relevant receptors are also adopted and can be found in Appendix G1.	3152
4309	The stakeholder was concerned about the impact on marine life sensibilities and populations.	Regia EP has conducted thorough impact assessments for all relevent receptors including plankton, fish, invertebrates, birds, turtles, and marine mammals. The Regia MSS will not impact the population stability of any taxa within the area of operation. Measures to minimise adverse impacts on relevant biological receptors in the region and relevent mitigation measures have been outlined in the EP.	2273
4351	There is a request for information concerning detection technologies utilised for monitoring blue whales.	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. CGG has committed to several detection methods including aerial surveys, MFO's, PAM systems,and a fixed buoy detection system. CGG will also establish a whale expert panel to help infoprm decision making during the survey. This information is inlcuded in the EP E7, G1 and G2.	2007
4353	Concerns about the impact of oil and gas exploration on the marine environment, particularly in regards to seismic testing and its harmful impacts on whales.	Titleholder responded that a detailed assessment has been completed of all available relevant scientific literature to inform the management and mitigation of MSS and their interaction with whales. Spatial and temporal zoning in conjunction with mitigation measures will ensure that interactions will minimise disturbances to whales.	612
4354	Uncertainty about the full extent of 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
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
4357	The stakeholder raised an objection to seismic surveys as they negatively effect the	Title holder has undertaken a thorough analysis and assessment of all relevant literature to inform its decisions. The MSS will not impact the population	424

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	fishing industry, local economy and environment.	stability of 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.	
4358	The stakeholder was concerned about the impacts on flora and fauna being damaged and killed away from the coastline.	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 flora or fauna within the area of operation. Mitigation plans are in place to reduce any impacts to as low as practicable.	2821
4454	Claims uncertainty due to reliance on fixed buoy, as this method is proposed as the sole strategy beyond visual and towed PAM detection ranges, means risks to threatened species have not been reduced to as low as reasonably practicable, and that CGG's environmental management system is not effectively implemented. Stakeholder argues that the system's effectiveness is undermined because triangulation of detections is not guaranteed and the testing protocol requires only a single successful unit test before deploying an array.	The EP acknowledges the limitation regarding guaranteed triangulation with the fixed buoy acoustic detection system. However, the system is one part of a multi-faceted detection and mitigation strategy that also includes towed PAM, visual observers, aerial surveys, and spatial/temporal activity restrictions. This combination of measures supports the implementation of the defined shutdown zones and activity limitations, thereby managing risks to ALARP and achieving acceptable environmental outcomes for species like BW and SRW. To note, an incorrect reference was used by the stakeholder.	EVT132
4455	The objection argues that the Environmental Plan's reliance on "near real time" data transmission between Acoustic Detection Monitoring operators and seismic operators is flawed because the term is undefined, with no limits on latency or provisions for equipment and communication failures in offshore conditions. The objection states that given the speed of whale movement and the immediacy of sound exposure, the lack of clear parameters renders the measure unreliable. Without evidence that the system can function effectively, the objection maintains that the control cannot be shown to reduce impacts to ALARP, and the ambiguity means the plan fails to meet regulatory requirements for appropriate, measurable	In Appendix G1 the EP describes standards for the control measures, including: One ADM Operator to always listen for LF cetacean calls for the duration of the survey and immediately communicate positive detections of LF cetaceans to the Environmental Officer. Further information on the towed and tethered ADM is contained in Appendix C7. This has not been made publicly available due to being commercial in confidence. In addition, the system is one part of a multi-faceted detection and mitigation strategy that also includes towed PAM, visual observers, aerial surveys, and spatial/temporal activity restrictions. This combination of measures supports the implementation of the defined shutdown zones and activity limitations, thereby managing risks to ALARP and achieving acceptable environmental outcomes for species like BW and SRW. To note, an inncorrect reference was used by the stakeholder.	EVT132

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	environmental performance standards.		
4456	The objection contends that CGG's proposed tethered buoy Passive Acoustic Monitoring (PAM) system is an unproven and unreliable primary mitigation measure for detecting marine mammals beyond the range of visual observation and towed PAM. It highlights contradictions within Appendix F5, which claims such systems have been used in seismic surveys while also stating their application in this context is "unknown." Published research shows only limited use in very different settings, such as large-scale Arctic noise monitoring arrays, rather than real-time whale detection. The objection concludes that relying on this experimental technology as a primary safeguard does not meet the regulatory requirement to reduce environmental impacts to ALARP, given the absence of evidence demonstrating its effectiveness in comparable operational environments like the Otway Basin.	Regarding the alleged contradiction in F5: The EP describes both the potential and general use of PAM systems deployed near the survey area (which can include buoys) during seismic surveys for real-time monitoring, and then a detailed, vendor-specific assessment of the actual documented history of particular tethered buoy PAM products. As stated in the EP, the PAM system is one part of a multi-faceted detection and mitigation strategy that also includes towed PAM, visual observers, aerial surveys, and spatial/temporal activity restrictions. The tethered buoy is also undergoing real-world testing, prior to any activity. This combination of measures supports the implementation of the defined shutdown zones and activity limitations, thereby managing risks to ALARP and achieving acceptable environmental outcomes for species like BW and SRW.	EVT132
4457	The objection references NOPSEMA's 2019 inspection report for the Otway Basin 2DMC Marine Seismic Survey, which concluded that published scientific evidence does not support passive acoustic monitoring (PAM) as an effective method for detecting Whales, including foraging Blue Whale and lactating females with calves, when the system is towed directly behind an active seismic or support vessel, stating that CGG has not addressed known limitations and therefore is inconsistent with the precautionary principle without providing peer-reviewed evidence that addresses the limitations previously identified.	The 2019 comments from NOPSEMA are related to a different proposal, with an alternative towed PAM system. The Sercel Quietsea PAM system has been accepted and used during Australian seismic surveys. In addition, as stated in the EP, the PAM system is one part of a multi-faceted detection and mitigation strategy that also includes towed PAM, visual observers, aerial surveys, and spatial/temporal activity restrictions.	EVT132
4458	Objects to the procedures concerning 'flocks of forgaing birds' not providing	Appendix G2 has been updated to footnote definition of flock and forgaing as follows: There is no set number of birds that constitutes a	EVT132

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	criteria for what constitutes a flock.	flock. For the purposes of mitigating impacts/risks to all foraging birds, a small flock is considered a group of less than 20 birds, a medium flock a group of 20 to 100 birds and a large flock a group of over 100 birds. Mitigations should consider medium to large flocks of birds to minimise potential for negative impacts to occur. These impacts could include alterations to resting regime, alterations to foraging success, collision, alterations to group cohesion. Foraging, as it relates to birds, includes bird species participating in feeding behaviours such as plunging and diving.	
4459	Objects to the commitment in the Fauna Management Plan (FMP) to adhere to the EPBC regulations regarding vessel speed and direction changes, due to the assertion that this is beyond the capability of a seismic vessel.	As stated in the EP, if a whale approaches within 300m of any vessel, the vessel must: • Reduce speed and maintain at least 300 m from the whale • Position vessel to not impede the path of the whale • Avoid sudden changes in speed or direction • Communicate the sighting These are all within the ability of the vessel.	EVT132
4503	GMTOAC claims inconsistencies and contradictions within CGG's April 2025 EP, particularly regarding the enforceable activity limitations intended to reduce risks to Southern Right Whales and Blue Whales. GMTOAC notes that NOPSEMA previously identified this issue in 2024, stating that duplication and inconsistencies left "no single source of truth" for assessing the EP. GMTOAC believes this fundamental flaw remains unresolved in the April 2025 version, undermining the reliability and enforceability of CGG's proposed control measures. GMTOAC provided the following examples: • Although the EP states that Appendix A2 contains the "final" list of enforceable activity limitations, it later states that Appendix G1 is "controlling" and overrides other lists. GMTOAC notes that many	CGG rejects claims of inconsistency between Appendices A2, G1 and G2, however the stakeholder may have misunderstood the distinction between activity limitations and control measures. Appendix A2 sets enforceable activity limits, measures that restrict operations to avoid or reduce impacts—while Appendix G1 details the control measures, performance standards, and procedures used to implement those limits in line with NOPSEMA's definition of controls. A2 and G1 serve different but complementary purposes, with A2 defining mandatory constraints and G1 outlining the operational steps required to meet them, together ensuring SRWs are protected from behavioural disturbance. G1 and G2 are also complementary rather than conflicting: G2 defines roles and responsibilities, while G1 outlines the controls and measurement criteria used to verify them. CGG maintains that the Environmental Officer and Survey Environment Advisor roles are clearly aligned across both appendices, collectively providing continuous oversight, shutdown authority,	EVT352

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	measures appear in one appendix but not the other, and others contain conflicting descriptions. For example, Appendix A2 and Appendix G1 both outline conditions for discharging the sound source in the Southern Right Whale reproduction BIA, but the conditions differ in scope and detail. GMTOAC warns that such internal discrepancies create confusion for vessel crews and contractors and could jeopardise the species the measures are intended to protect. • GMTOAC highlights conflicting and unclear role descriptions across appendices, particularly for key positions such as the Survey Environment Advisor and Environmental Officer. Responsibilities differ between Appendix G1 and G2, creating uncertainty about who is accountable for shutdowns, communication, monitoring, aerial surveys, technology trials, and 24/7 oversight. GMTOAC notes that the EP does not clarify whether multiple staff will be appointed to fulfil these demanding roles. • Several measures appear in one appendix but not another. For instance, Appendix G2 requires pre-survey aerial surveys, but this requirement is absent from the controlling Appendix G1. Similarly, Appendix G1 includes commitments to trial drone and satellite detection technologies, but these are not included in the Fauna Management Plan, leaving unclear whether they are required or how their effectiveness will be assessed. • GMTOAC claims that these inconsistencies make it difficult, if not impossible, for operators to understand or correctly implement the required measures, with potential serious consequences for Nyamat Mirring, its ecosystems, and culturally	monitoring coordination, and expert engagement. CGG also notes that activity-level commitments, such as drone and satellite detection trials, rightly sit in G1, while position-specific duties like aerial surveys sit in G2. It states that the EP is intentionally structured so A2, G1 and G2 each fulfil distinct functions within an integrated management system, providing operators with clear instructions, objective decision-making criteria, and independent oversight from the Expert Panel. CGG concludes that this framework ensures transparent, robust management and effective protection of Southern Right Whales and Pygmy Blue Whales.	

Feedback ID	Objection or Claim Summary	Titleholder Response	Event ID
	significant species such as Southern Right Whales and Pygmy Blue Whales. They also express concern that CGG's qualitative measures, such as determining whether disturbance is "acceptable", lack objective criteria and fail to involve the Whale Expert Panel or reference Recovery Plan standards.		