



Administrative Record of Continuing Operational Impact Correspondence

EPA POLLUTION REPORTS — LAL LAL WIND FARM

Trust: **Owen Robert Inter Vivos Trust**

Trustee: **LEWIS TROJAN HORSE PTY LTD** (ACN 693 680 509)

Document Control

Document Title: Administrative Record of Continuing Operational Impact Correspondence

Submission: Supplementary Public Interest Submission – Lal Lal Wind Farm

Prepared by: **LEWIS TROJAN HORSE PTY LTD** (ACN 693 680 509), as Trustee of the **Owen Robert Inter Vivos Trust**

Record Date: 29 June 2026

Submission Date: 5 July 2026

Status: Issued with Supplementary Public Interest Submission

Description

The following correspondence was received from the Beneficiary, Owen Robert, in his private capacity, providing information regarding pollution reports lodged with the Environment Protection Authority Victoria (EPA) relating to operational noise impacts associated with the Lal Lal Wind Farm.

Each correspondence was expressly provided:

- for information only;
- without instruction or direction to the Trustee; and
- for the Trustee's independent consideration and record.

The correspondence included EPA acknowledgement emails and related documentation associated with the relevant pollution report entries.

The Trustee notes that the continuing operational impact reports identified within this record have persisted contemporaneously during the period in which broader documentary and regulatory matters concerning the Lal Lal Wind Farm have remained under consideration, including matters relating to chronology, framework sequencing, agency-held records, audit and verification documentation, and associated regulatory materials previously identified within the Trust record.

This record is maintained for administrative, chronology, evidentiary, and continuity purposes only.

Historical Correspondence (Pre-Trust Execution)

The Trustee has additionally received historical correspondence from the Beneficiary, Owen Robert, in his private capacity, including operational impact reports, pollution report material,

EPA correspondence, and related communications concerning the Lal Lal Wind Farm dating from approximately September 2020 onward.

These materials pre-date execution of the Trust in December 2025 and were subsequently provided to the Trustee as part of the Beneficiary’s broader correspondence and documentary record.

The historical materials include, without limitation:

- pollution reporting material;
- EPA correspondence;
- correspondence directed to or received from the Lal Lal Wind Farm;
- operational impact records;
- and associated compiled attachments retained by the Beneficiary.

These materials are retained by the Trustee for continuity and completeness of the broader administrative and evidentiary record.

For clarity:

- these historical materials were not provided to the Trustee contemporaneously at the time of their creation;
- and are not maintained within the batch-format chronology adopted for correspondence received following execution of the Trust.

General Chronology of Materials Retained

Period	Material Type
September 2020 – December 2025	Historical operational impact reports, EPA pollution reporting material, correspondence, and associated records provided retrospectively by the Beneficiary
January 2026 onward	Contemporaneous Beneficiary correspondence, EPA pollution reporting material, EPA acknowledgements, and associated operational impact records maintained by the Trustee

Batch Correspondence Received

Batch 1 — Early January 2026 Pollution Reports

Pollution reports lodged:

- PRI-00120276 — lodged 7 January 2026
- PRI-00120354 — lodged 8 January 2026
- PRI-00120470 — lodged 9 January 2026
- PRI-00120484 — lodged 9 January 2026
- PRI-00120564 — lodged 10 January 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above reports.

Batch 2 — 19 January 2026 Pollution Report

Pollution report lodged:

- PRI-00121278 — lodged 19 January 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above report.

Batch 3 — Late January 2026 Pollution Reports

Pollution reports lodged:

- PRI-00121808 — lodged 24 January 2026
- PRI-00121904 — lodged 25 January 2026
- PRI-00122016 — lodged 27 January 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above reports.

Batch 4 — 27–30 January 2026 Pollution Reports

Pollution reports lodged:

- PRI-00122106 — lodged 27 January 2026
- PRI-00122111 — lodged 27 January 2026
- PRI-00122120 — lodged 28 January 2026
- PRI-00122318 — lodged 30 January 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above reports.

Batch 5 — February 2026 Pollution Reports

Pollution reports lodged:

- PRI-00122790 — lodged 3 February 2026
- PRI-00122795 — lodged 3 February 2026
- PRI-00122877 — lodged 3 February 2026
- PRI-00122900 — lodged 4 February 2026
- PRI-00123406 — lodged 8 February 2026
- PRI-00123725 — lodged 11 February 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above reports.

Batch 6 — Mid-February 2026 Pollution Reports

Pollution reports lodged:

- PRI-00125033 — lodged 16 February 2026
- PRI-00125141 — lodged 17 February 2026
- PRI-00125243 — lodged 17 February 2026
- PRI-00125368 — lodged 19 February 2026

- PRI-00125719 — lodged 21 February 2026
- PRI-00125737 — lodged 22 February 2026

Attachments provided:

- EPA acknowledgement correspondence relating to the above reports.

EPA Correspondence Noted by the Beneficiary

The Beneficiary additionally noted that correspondence titled:

“Final Closure – PRI-xxxxx CRM”

had been received from EPA in relation to multiple pollution report entries lodged between 7 January 2026 and 11 February 2026.

The Beneficiary additionally noted that PRI-00120564 (10 January 2026) received EPA correspondence stating that EPA maintains the view that Lal Lal Wind Farm is currently complying with its obligations under the applicable Act and Regulations, however no corresponding “Final Closure” notice had been received at the time the material was provided to the Trustee.

EPA Correspondence — 12 March 2026 (Final Closure Notifications)

The Beneficiary provided further correspondence dated 12 March 2026 relating to EPA notifications bearing the subject line:

“Final Closure – PRI-xxxxx CRM”

The notifications correspond to the following previously reported pollution report entries:

- PRI-00120276 — 07 January 2026
- PRI-00120354 — 08 January 2026
- PRI-00120470 — 09 January 2026
- PRI-00120484 — 09 January 2026
- PRI-00121278 — 19 January 2026
- PRI-00121808 — 24 January 2026
- PRI-00121904 — 25 January 2026
- PRI-00122016 — 27 January 2026
- PRI-00122106 — 27 January 2026
- PRI-00122111 — 27 January 2026
- PRI-00122120 — 28 January 2026
- PRI-00122318 — 30 January 2026
- PRI-00122790 — 03 February 2026
- PRI-00122795 — 03 February 2026
- PRI-00122877 — 03 February 2026
- PRI-00122900 — 04 February 2026
- PRI-00123406 — 08 February 2026
- PRI-00123725 — 11 February 2026

The Beneficiary additionally noted that:

- a number of the notifications appeared to duplicate EPA correspondence previously received on 13 February 2026; and

- the notifications issued on 12 March 2026 appeared to have been transmitted more than once for certain reference numbers within a short period of time.

A compiled PDF of the correspondence received on 12 March 2026 was provided to the Trustee for record purposes.

EPA Pollution Reports — March 2026

The Beneficiary provided correspondence recording further pollution reports lodged with the Environment Protection Authority Victoria in March 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00126518 — lodged 02 March 2026
- PRI-00127205 — lodged 09 March 2026
- PRI-00127359 — lodged 11 March 2026
- PRI-00127771 — lodged 15 March 2026

A compiled PDF of EPA acknowledgement correspondence associated with these reports was provided to the Trustee for record purposes.

EPA Pollution Reports — Late March 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in March 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00128568 — lodged 24 March 2026
- PRI-00128672 — lodged 25 March 2026
- PRI-00128695 — lodged 25 March 2026
- PRI-00129077 — lodged 30 March 2026
- PRI-00129191 — lodged 30 March 2026
- PRI-00129203 — lodged 31 March 2026

A compiled PDF of EPA acknowledgement correspondence associated with these reports was provided to the Trustee for record purposes.

EPA Pollution Reports — April 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in April 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00129309 — lodged 1 April 2026
- PRI-00129811 — lodged 6 April 2026
- PRI-00129822 — lodged 7 April 2026
- PRI-00129986 — lodged 9 April 2026
- PRI-00130314 — lodged 13 April 2026
- PRI-00130504 — lodged 15 April 2026
- PRI-00130619 — lodged 16 April 2026

- PRI-00130709 — lodged 16 April 2026

For clarity, no duplication of previously recorded March 2026 pollution reports is included within this section.

A compiled PDF of EPA acknowledgement correspondence associated with these reports was provided to the Trustee for record purposes.

EPA Pollution Reports — Late April 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in April 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00130950 — lodged 20 April 2026
- PRI-00131051 — lodged 21 April 2026
- PRI-00131115 — lodged 21 April 2026
- PRI-00131173 — lodged 22 April 2026
- PRI-00131262 — lodged 22 April 2026
- PRI-00131458 — lodged 24 April 2026
- PRI-00131562 — lodged 24 April 2026
- PRI-00131625 — lodged 25 April 2026
- PRI-00131661 — lodged 25 April 2026
- PRI-00131680 — lodged 26 April 2026
- PRI-00132099 — lodged 30 April 2026
- PRI-00132229 — lodged 30 April 2026

The Beneficiary additionally noted that correspondence relating to PRI-00131115 stated:

“EPA is currently undertaking regulatory action regarding this issue.”

The Beneficiary further noted that the above correspondence was the last correspondence received in relation to PRI-00131115 at the time the material was provided to the Trustee.

A compiled PDF of EPA acknowledgement correspondence associated with these reports was provided to the Trustee for record purposes.

EPA Pollution Reports — May 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in May 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00132265 — lodged 01 May 2026
- PRI-00132396 — lodged 02 May 2026
- PRI-00132482 — lodged 02 May 2026
- PRI-00132524 — lodged 03 May 2026
- PRI-00132556 — lodged 03 May 2026
- PRI-00132566 — lodged 04 May 2026
- PRI-00132829 — lodged 06 May 2026

•PRI-00132838 — lodged 07 May 2026

A compiled PDF of EPA acknowledgement correspondence associated with these reports was provided to the Trustee for record purposes.

EPA Correspondence — Late May 2026

The Beneficiary provided further correspondence received from the Environment Protection Authority Victoria (EPA) during May 2026 relating to pollution reports lodged concerning operational noise impacts associated with the Lal Lal Wind Farm.

The correspondence included both acknowledgement notifications and subsequent EPA response notifications relating to the following pollution report entries:

- PRI-00133570 — lodged 15 May 2026
- PRI-00133670 — lodged 16 May 2026
- PRI-00133988 — lodged 19 May 2026
- PRI-00134151 — lodged 22 May 2026
- PRI-00134237 — lodged 22 May 2026
- PRI-00134247 — lodged 23 May 2026
- PRI-00134383 — lodged 24 May 2026
- PRI-00134899 — lodged 29 May 2026

The Beneficiary additionally noted that EPA response correspondence received during May 2026 was not uniform in form.

The Beneficiary noted that correspondence relating to:

- PRI-00133670;
- PRI-00133988;
- PRI-00134151;
- PRI-00134247;
- PRI-00134383; and
- PRI-00134899

included wording to the effect that EPA maintains the view that Lal Lal Wind Farm is currently complying with its obligations under the applicable Act and Regulations, whilst noting that EPA would continue to monitor compliance and take appropriate action if future non-compliance is identified.

The Beneficiary further noted that correspondence relating to:

- PRI-00133570; and
- PRI-00134237

advised that the report had been reviewed to assess risk to the environment and human health, including consideration of the circumstances of the event and whether there had been any previous related incidents, and stated that the assessment had not resulted in further regulatory action by EPA.

The Beneficiary additionally noted that the correspondence associated with the above reports appeared to comprise differing EPA response formats notwithstanding that the reports concerned operational noise impacts associated with the same facility.

Copies of the relevant EPA correspondence were provided to the Trustee for record purposes and retained as part of the ongoing administrative and evidentiary record.

EPA Pollution Reports — June 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in June 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00135192 — lodged 02 June 2026
- PRI-00135324 — lodged 02 June 2026
- PRI-00135374 — lodged 03 June 2026
- PRI-00135448 — lodged 03 June 2026
- PRI-00135607 — lodged 05 June 2026
- PRI-00135622 — lodged 06 June 2026
- PRI-00135666 — lodged 06 June 2026
- PRI-00135686 — lodged 07 June 2026
- PRI-00135816 — lodged 08 June 2026
- PRI-00135824 — lodged 09 June 2026
- PRI-00135899 — lodged 09 June 2026
- PRI-00136118 — lodged 12 June 2026
- PRI-00136230 — lodged 13 June 2026

The Beneficiary provided a compiled PDF containing EPA acknowledgement correspondence associated with the above reports.

The Beneficiary additionally noted that a number of the reports were accompanied by EPA correspondence stating that EPA maintains the view that Lal Lal Wind Farm is currently complying with its obligations under the applicable Act and Regulations, whilst indicating that EPA would continue to monitor compliance and take appropriate action in the event that future non-compliance is identified.

The correspondence and associated report material were provided to the Trustee for record purposes and retained as part of the ongoing administrative and evidentiary record.

EPA Pollution Reports — Late June 2026

The Beneficiary provided further correspondence recording additional pollution reports lodged with the Environment Protection Authority Victoria in June 2026 relating to operational noise impacts associated with the Lal Lal Wind Farm.

The reports are identified as:

- PRI-00136342 — lodged 15 June 2026
- PRI-00136426 — lodged 16 June 2026
- PRI-00136503 — lodged 16 June 2026
- PRI-00136517 — lodged 17 June 2026
- PRI-00136705 — lodged 18 June 2026
- PRI-00136806 — lodged 20 June 2026
- PRI-00136994 — lodged 22 June 2026
- PRI-00136999 — lodged 23 June 2026
- PRI-00137067 — lodged 23 June 2026
- PRI-00137084 — lodged 23 June 2026
- PRI-00137097 — lodged 24 June 2026
- PRI-00137497 — lodged 29 June 2026
- PRI-00137570 — lodged 29 June 2026

The Beneficiary additionally advised that, owing to the current volume of material, a scanned compilation of the associated EPA acknowledgement correspondence had not yet been prepared.

The Beneficiary further advised that the original hard-copy compilation had been retained and would be provided to the Trustee for inclusion within the Trust record if required.

The correspondence was provided to the Trustee for record purposes and retained as part of the ongoing administrative and evidentiary record.

Record Status

Copies of the Beneficiary correspondence and associated EPA documentation (where provided) are retained by the Trustee as part of the ongoing administrative and evidentiary record of the Trust.

This record is maintained:

- for chronology purposes;
- for administrative continuity;
- for preservation of contemporaneous operational impact reporting associated with the Lal Lal Wind Farm; and
- for preservation of the broader historical continuity of operational impact material provided by the Beneficiary.

The Trustee makes no finding within this record as to regulatory breach, statutory liability, or legal conclusion.

The Trustee notes, however, that the continuing operational impact reports identified above persist contemporaneously with broader documentary and regulatory matters previously identified within the disclosed record concerning chronology, framework sequencing, agency-held documentation, audit and verification material, and associated regulatory records relating to the Lal Lal Wind Farm.