

SUPPORTING RECORD AND ANALYTICAL MEMORANDUM

Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Supplementary Contextual Addendum

Version 1.1 — 16 March 2026

Prepared by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

Prepared in support of the Statement of Matters of Public Interest dated 19 February 2026

Version Status Note

Version

1.1 of the Supporting Record and Analytical Memorandum is issued as a supplementary contextual addendum to the memorandum executed as Version 1.0 — 7 March 2026.

Version

1.0 recorded chronology, document references, and milestone descriptors appearing within the disclosed regulatory and project record.

Version

1.1 introduces additional contextual material identified following continued review of the documentary record.

Version 1.0 remains unchanged and continues to form part of the administrative record.

Version 1.0 of the Supporting Record and Analytical Memorandum dated 7 March 2026 is incorporated into this addendum by reference and should be read together with this document.

Addendum Reference Statement

This document is issued as a supplementary contextual addendum to the Supporting Record and Analytical Memorandum executed as Version 1.0 — 7 March 2026.

Version

1.1 is intended to assist contextual understanding of the regulatory and technical framework referenced within Version

1.0 and does not replace or supersede the chronology recorded in that document.

Version

1.0 remains the primary chronology record forming part of the administrative record of the Trustee.

Document Control

Document Title

Supporting Record and Analytical Memorandum

Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Prepared by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

Version Control

Version 1.0

Date: 7 March 2026

Initial supporting record compiled following issuance of the Statement of Matters of Public Interest dated 19 February 2026.

Version 1.1

Date: 16 March 2026

Supplementary contextual addendum issued following continued review of the documentary record and additional material identified within regulatory correspondence, consultant reports, governing instruments, public explanatory material, operational generation information, and Freedom of Information disclosures.

Version Control Note

Subsequent versions of this memorandum may be issued where additional documentary material becomes available, including through:

- Freedom of Information processes
- regulatory correspondence
- consultant documentation
- audit verification material
- governing instruments or associated administrative material
- or other disclosed records relevant to the Lal Lal Wind Farm regulatory framework.

Earlier versions remain part of the administrative record and are not retrospectively altered.

Document Status — Executed Record

This document constitutes the executed Version

1.1 of the Supporting Record and Analytical Memorandum prepared by **LEWIS TROJAN HORSE PTY LTD** (ACN 693 680 509) as Trustee of the **Owen Robert Inter Vivos Trust**.

Version 1.1 is executed on 16 March

2026 and forms part of the documentary record associated with the Statement of Matters of Public Interest dated 19 February 2026.

Version 1.1 should be read together with:

- the Statement of Matters of Public Interest
- Annex A — K15aa Baseline Integrity and Regulatory Reliance Record
- Annex B — SAC-01 Special Audible Characteristics Record
- Annex C — EPA Internal Review Correspondence and Regulatory Reliance Record
- Annex D — Cross-Agency Custody Record
- Supporting Record and Analytical Memorandum Version 1.0 dated 7 March 2026.

1. Purpose of this Addendum

This addendum records additional contextual information identified following execution of Version 1.0 of the Supporting Record and Analytical Memorandum.

The additional material is included solely to assist contextual understanding of the regulatory, documentary, and technical environment within which the Lal Lal Wind Farm monitoring record operates.

This addendum:

- does not alter the chronology recorded in Version 1.0
- does not modify the observations contained in Version 1.0
- does not determine regulatory compliance or non-compliance
- does not assert breach, wrongdoing, liability, or enforcement outcomes.

Version 1.0 remains the primary chronology record.

2. Relationship to the Statement of Matters of Public Interest

The Statement of Matters of Public Interest dated 19 February 2026 identifies structural questions concerning the regulatory administration of wind farm noise obligations in Victoria.

That Statement is supported by evidentiary annexes recording the relevant documentary material:

- Annex A — K15aa Baseline Integrity and Regulatory Reliance
- Annex B — SAC-01 Special Audible Characteristics
- Annex C — EPA Internal Review Correspondence and Regulatory Reliance Record
- Annex D — Cross-Agency Custody Record.

The Supporting Record and Analytical Memorandum performs a separate function.

It collates:

- chronology
- document references
- milestone descriptors
- interactions between regulatory materials.

The memorandum does not determine legal interpretation or regulatory outcomes.

3. Regulatory Framework Context (Reference Only)

Wind farm noise regulation for the Lal Lal Wind Farm operates within a framework comprising planning instruments, environmental regulation, and technical acoustic standards.

Relevant instruments appearing within the disclosed regulatory record include:

Planning Instrument

Planning Permit PL-SP/05/0461-2, including associated incorporated documents and endorsed material prepared pursuant to permit conditions.

Technical Standard

NZS 6808:2010 — Acoustics: Wind Farm Noise.

Project-Specific Compliance Instrument

Noise Compliance Testing Plan

(NCTP) incorporated within the planning permit framework. The NCTP records that it was prepared to address permit conditions, specifies operational noise assessment procedures, and, once approved, forms part of the planning permit framework.

Environmental Regulation

- Environment Protection Act 2017 (Vic)
- Environment Protection Regulations 2021, including wind turbine noise provisions and associated definitions.

Environmental Audit System Context

The disclosed record also includes EPA auditor guidance material relevant to audit scope, criteria, information review, monitoring data, and audit reporting limitations.

These instruments and materials collectively define the regulatory context within which noise monitoring, compliance reporting, audit verification, and regulatory reliance occur.

This section is included for contextual orientation only.

4. Regulatory Sequence Context

Wind farm compliance frameworks typically operate through a sequence linking planning approvals, monitoring requirements, compliance reporting, and regulatory oversight.

A simplified representation of the framework appearing in the disclosed record is as follows:

Planning Permit

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Noise Compliance Testing Plan (NCTP)

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NZS 6808:2010 Wind Farm Noise Standard

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Background Noise Monitoring

↓

Operational Compliance Monitoring

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Compliance Reporting and Auditor Verification

↓

Regulatory Oversight

This representation is provided solely for contextual orientation and does not determine the legal hierarchy of instruments.

5. Documentary Methodology

The Supporting Record and Analytical Memorandum compiles chronology and document descriptors appearing in the regulatory and project record.

The memorandum:

- records statements appearing in documents
- records interactions between documents
- records chronology where documents reference earlier events or material.

The memorandum does not:

- substitute interpretation for documentary statements
- determine regulatory hierarchy
- determine legal sufficiency of documents.

6. Regulatory Record Integrity

The materials referenced within the Supporting Record are derived from sources including:

- consultant reports
- environmental auditor verification statements
- regulatory correspondence
- Freedom of Information disclosures
- planning authority documentation
- publicly available operational information
- governing instruments and associated compliance instruments
- public explanatory or presentation material forming part of the disclosed record.

Where the record identifies apparent inconsistencies, omissions, or differing representations, those matters are recorded only as interactions between documents appearing in the disclosed record.

The memorandum does not determine motive, intent, or legal consequence.

7. Cross-Agency Documentary Context

The regulatory framework governing the Lal Lal Wind Farm operates within a multi-agency administrative structure.

Material disclosed through Freedom of Information processes indicates that document custody and reliance positions may differ across:

- the Environment Protection Authority (EPA)
- the Responsible Authority (Council)
- the Department of Transport and Planning (DTP).

Annex D records these custody positions as disclosed through FOI decisions, including instances where foundational monitoring or assessment material was not held by particular agencies at the time of the searches undertaken.

This memorandum records the existence of those custody records but does not draw conclusions from them.

8. Independent Technical Review Material

The documentary record also includes an independent technical review titled:

“Review — Lal Lal Wind Farm Environmental Noise Assessments” prepared by L Huson & Associates Pty Ltd, dated September 2022.

The review was commissioned by DST Legal and examines acoustic and audit reports associated with Lal Lal Wind Farm monitoring and assessment documentation.

The reports reviewed include:

- Lal Lal Wind Farm Compliance Baseline Noise Monitoring (SLR)
- Lal Lal Wind Farm Elaine Post-Construction Noise Assessment (SLR)
- the Noise Compliance Test Plan (Marshall Day Acoustics)
- environmental auditor verification material associated with post-construction assessments.

The review also examines monitoring data associated with complaint investigations conducted at dwelling J14aa during the period October–December 2020.

A copy of this review has been supplied to regulatory bodies including:

- Environment Protection Authority Victoria
- Department of Transport and Planning
- Moorabool Shire Council.

This memorandum records the existence and regulatory circulation of that document within the broader documentary record.

No interpretation or technical assessment of the review is undertaken within this memorandum.

9. Relationship to Annex Records

This memorandum should be read together with the evidentiary annexes supporting the Statement of Matters of Public Interest, which record specific components of the regulatory and documentary record.

Those annexes address:

- background sound derivation at reference receptor K15aa
- procedural reporting of Special Audible Characteristics (SACs)
- environmental auditor verification statements and regulatory correspondence
- cross-agency document custody and FOI outcomes.

Each annex records factual material appearing in the disclosed regulatory record and does not determine compliance outcomes.

10. Record Limitation

This memorandum:

- does not determine legal interpretation of statutory provisions
- does not determine compliance with planning permits or regulations
- does not determine evidentiary sufficiency of consultant or audit reports
- does not substitute for regulatory decision-making.

Its function is limited to recording chronology and interaction between materials appearing in the disclosed documentary record.

11. Regulatory Chronology Record (Documentary Record)

The following chronology summarises key milestones appearing within the disclosed regulatory and documentary record relating to monitoring, verification, and regulatory reliance for the Lal Lal Wind Farm.

2017

Predictive shadow flicker modelling is referenced within regulatory correspondence and Freedom of Information requests.

23 January 2018

The Noise Compliance Testing Plan is finalised and approved within the permit framework. The NCTP is recorded as having been prepared to address permit conditions and to form part of the planning permit framework once approved.

2019

Monitoring is undertaken at reference receptor K15aa. Consultant material records turbine installation and turbine operation during parts of the monitoring period.

October to December 2020

Interim monitoring is undertaken during the commissioning period. Monitoring is recorded during ramp-up or constrained operational conditions prior to later descriptions of full operation.

10 December 2020

Completion of commissioning of the final turbine is recorded in operator documentation.

2021

The compliance baseline monitoring report is prepared and later referenced within regulatory and consultant documentation.

June 2022

Environmental auditor verification is issued for Stage

1 Elaine. The verification material includes express reference to regulation 131D obligations.

September 2022

An independent technical review is prepared and circulated to EPA, DTP, and Council.

18 October 2022

The Noise Management Plan is dated. The document is later referenced in EPA correspondence and Freedom of Information disclosures.

2023

Revised consultant reporting and additional auditor verification material are issued. Verification wording differs from earlier verification statements.

7 December 2023

Environmental auditor verification is issued for the Yendon component. The verification records methodological issues and the need for further measurements.

2024

The Stage 1 information-

session transcript records public consultant explanations concerning the NCTP, K15aa, amplitude modulation, and turbine screening methodology.

20 September 2024

The Stage 2 combined post-

construction assessment is issued, addressing the combined Elaine and Yendon facility.

24 September 2024

The Stage

2 auditor verification is issued. The verification is limited to planning permit and NCTP scope, with the regulations noted separately.

2024 to 2025

Regulatory correspondence and Freedom of Information processes continue. The documentary record includes regulatory reliance positions and document custody outcomes.

19 February 2026

The Statement of Matters of Public Interest is issued by the Trustee.

2026

The Supporting Record and Analytical Memorandum is compiled as a chronology and record-reconciliation document supporting the administrative record.

12. Regulatory Integrity Summary (Documentary Cross-Reference)

The following cross-reference record summarises interactions between instruments, reporting material, and regulatory reliance positions appearing within the disclosed record.

Background Sound

The governing instrument is NZS 6808:2010, which defines background sound.

Within the project framework, the NCTP relies on derived limits.

Consultant material records monitoring at K15aa in 2019.

Auditor material records reliance on consultant datasets and methodology.

EPA correspondence records reliance on later assessment material incorporating those datasets.

Background Dataset Derivation

NZS 6808:2010 contains the temporal definition concerning pre-installation background sound.

Within the project framework, the NCTP uses background-derived regressions for operational assessment.

Consultant material records treatment, adjustment, or modelling of the K15aa dataset.

Auditor verification records acceptance of consultant methodology within the stated audit scope.

The disclosed regulatory record does not identify a separate reconciliation document addressing the temporal requirement of the NZS definition.

Special Audible Characteristics (SACs)

The governing framework is the SAC framework contained in NZS 6808:2010.

Within the project framework, the NCTP prescribes attended-observation procedures for SAC identification.

Consultant reports record attended observations within monitoring campaigns.

Auditor material records acceptance of compliance reports and associated methodology within scope.

Regulatory correspondence records reliance on the reporting record.

Monitoring Stages

The governing context includes environmental regulation establishing post-construction monitoring obligations.

Within the project framework, the NCTP identifies Stage 1 and Stage 2 monitoring structure.

Consultant reports record campaigns by reference to those stages.

Auditor verification is issued against the relevant stage material.

Regulatory correspondence later references the monitoring record and associated reporting.

Amplitude Modulation

The governing technical framework is the SAC treatment under NZS 6808:2010.

Within the project framework, the NCTP specifies a penalty framework.

Consultant material records use of an alternative methodology.

Auditor material records that the methodology differs and notes the issue in verification material.

Further regulatory discussion is recorded as having been contemplated.

Noise Management Plan

The governing framework includes the operational framework under the Environment Protection Regulations.

Within the project record, the NMP dated 18 October 2022 incorporates the NCTP structure.

Consultant and regulatory material later reference the NMP.

Auditor review of the NMP is recorded as having been requested.

EPA correspondence later references the NMP in its compliance posture.

Shadow Flicker

The governing context is the planning permit predictive assessment framework.

Within the project record, modelling is referenced by the operator.

Consultant or project material refers to a 2017 assessment.

No auditor verification is identified on the disclosed record.

Freedom of Information searches did not identify the referenced assessment document.

Cross-Agency Custody

The governing framework is multi-agency regulation and planning administration.

Within the project structure, planning permit administration and compliance material are distributed across agencies.

Consultant reports are referenced in different regulatory settings.

Verification documents circulate within that broader framework.

Freedom of Information outcomes record differing custody positions across EPA, Council, and DTP.

NCTP Approval and Endorsement

The governing source is the planning permit conditions.

Within the project framework, the NCTP is prepared and approved within the permit structure.

Consultant material later publicly describes the NCTP methodology and structure.

Auditor methodology review sits against that NCTP framework.

Later assessments and regulatory positions proceed on the basis of the NCTP.

K15aa Limit Status

NZS 6808:2010 provides the general technical framework.

Within the project record, the endorsed NCTP and later consultant material interact concerning K15aa.

The transcript records later derivation of K15aa-related limit material.

Audit and later reporting proceed with K15aa-related material included.

EPA correspondence records reliance on later assessment material.

Audit Scope and Criteria

The governing framework includes the Environment Protection Act audit system and EPA audit guidance.

Within the project framework, audits relate principally to permit and NCTP context.

Consultant reports are the subject matter of audit review.

EPA guidance records the significance of defined scope, criteria, monitoring data, and reporting

limitations.

EPA correspondence records reliance on auditor-verified material.

This section records documentary positions only and does not determine compliance outcomes.

13. Regulatory Trigger Analysis (Record-Based Only)

The disclosed regulatory and project record contains multiple trigger expressions relevant to the timing of monitoring, reporting, and administrative obligations.

These include references to:

- preparation and approval of the Noise Compliance Testing Plan before development starts
- commissioning of the last turbine of the development
- commencement of operation
- electricity generation and export activity
- operation under constrained or ramp-up conditions
- subsequent descriptions of the facility as operational or fully operational.

The Planning Permit and endorsed Noise Compliance Testing Plan record a permit-based framework under which the NCTP was to be prepared before development commenced and, once approved, endorsed to form part of the permit.

Later regulatory and consultant material records post-construction monitoring, commissioning references, operational descriptors, and commencement-of-operation references in differing documentary contexts.

This memorandum records the coexistence of those descriptors within the disclosed record and does not determine which descriptor governs for any particular legal purpose.

14. Consultant Public Explanation Record

The disclosed record also includes a transcript of the Stage 1 post-construction noise testing information session publicly presented in relation to the Elaine and Yendon sites.

In that session, the consultant described the endorsed NCTP as a document that brought together applicable standards, guidelines, legislation, and specified assessment procedures.

The transcript also records consultant statements that:

- a transcription error existed in the NCTP noise-limits table
- the NCTP did not include a noise limit for reference location K15aa and that a limit was later derived
- UK Institute of Acoustics material was used in relation to amplitude modulation
- the NCTP relevant-turbine screening methodology was regarded as highly conservative and a less conservative screening approach was also applied in the assessment process.

These statements are included solely as part of the documentary and public record relevant to how the assessment methodology was described.

No conclusion is drawn in this memorandum as to the legal or regulatory effect of those statements.

15. Operational Generation Context

The documentary record also includes publicly available operational generation data for the Lal Lal Wind Farm on dates corresponding with attended observations discussed in the broader record.

That material records the facility's capacity factor throughout the relevant periods and identifies intervals during which recorded generation appears minimal, absent, or comparatively low.

The generation datasets are included here solely as contextual material relevant to understanding the broader monitoring record and the timing of attended observations.

This memorandum does not determine:

- the operational state of individual turbines at specific moments
- whether turbines were operating intermittently
- whether generation data is determinative of audibility at any particular location.

16. Attended Listening Observation Record — 31 March 2021

The documentary record also includes attended listening observations recorded in Appendix D of the Elaine Stage 1 Post-Construction Noise Assessment.

Those observations were undertaken on 31 March 2021 at the following monitoring locations:

Monitoring Location Observation Time

K15aa	11:00 – 11:10
H18aa	11:20 – 11:30
L18aa	12:15 – 12:25

The observation notes record environmental conditions including cloud cover, temperature, ambient wind conditions, hub-height wind speed, and descriptive notes concerning audible sound sources.

The Appendix D record notes that:

- at K15aa wind turbine sound was recorded as inaudible, with ambient sound dominated by traffic, birds, and insects
- at H18aa wind farm sound was described as just audible with a slight hum and no other noise characteristics
- at L18aa wind farm sound was described as a faint hum similar to the previous measurement.

Publicly available generation data for the same date records a period during which generation appears minimal or absent for part of the morning period.

The relationship between:

- the Appendix D attended listening observations
- the generation data
- and consultant explanations recorded elsewhere in the documentary record

is recorded here as part of the documentary record.

This memorandum does not determine:

- whether turbines were operating intermittently
- whether individual turbines may have been producing sound during the observations
- whether the observations satisfy the procedural requirements of any regulatory instrument.

17. Additional Attended Observation Record — Horsehill Road (10 March 2021)

The documentary record also includes an additional attended observation undertaken on 10 March 2021 at a location described as “Loc #4 – Horsehill Road.”

The observation record notes that the nearest turbine was ESWT03 at approximately 200 metres from the observation point.

The observation location is also recorded as being approximately 1.4 kilometres from monitoring location H18aa, which is one of the receiver locations referenced within the Stage 1 monitoring program.

The recorded observation period was:

10 March 2021 — 05:30 to 07:00

The observation notes record the following environmental conditions:

- overcast conditions with light drizzle
- calm to light south-easterly wind conditions (0-2 m/s)
- hub-height wind speed approximately 5.2 m/s.

The descriptive notes recorded during the observation include:

- ambient noise sources including insects and birds
- wind turbines described as rotating slowly
- the observation notes describing the wind farm as appearing to be operating near cut-in wind conditions
- faint turbine sound described as a distant hum.

Publicly available generation data for the same date records relatively low generation levels during the early morning period.

The observation location identified as Horsehill Road does not correspond to the fixed compliance monitoring receiver locations specified in the Noise Compliance Testing Plan.

The observation is recorded here solely as part of the broader documentary record of attended observations associated with the Stage 1 monitoring period.

This memorandum does not determine the regulatory purpose or status of that observation.

18. Additional Attended Observation Record — Midland Highway (10 March 2021)

The documentary record also includes an attended observation recorded on 10 March 2021 at a location described in the observation notes as “H18aa – Midland Highway.”

The location descriptor indicates that the observation was undertaken at a position along Midland Highway, rather than at the fixed monitoring receiver location H18aa itself.

The observation location is recorded as being approximately 1.5 kilometres from monitoring location H18aa.

The observation was recorded at:

10 March 2021 — 12:00 to 12:10

The environmental conditions recorded in the observation notes include:

- partly sunny conditions
- temperature approximately 17°C

- south-easterly wind between 3 and 5 m/s
- hub-height wind speed approximately 4.8 m/s.

Ambient sound sources noted during the observation include:

- wind in trees and grass
- insects
- birds
- distant aircraft.

The observation notes record that:

- the nearest wind turbine was operating
- the second nearest turbine was stopped
- wind farm sound was inaudible at the observation location.

The observation is recorded here solely as part of the broader documentary record of attended observations associated with the Stage 1 monitoring period.

The location identified in the notes does not correspond to the fixed compliance monitoring receiver location H18aa specified in the Noise Compliance Testing Plan.

This memorandum does not determine the regulatory purpose or status of the observation.

19. Monitoring Event Summary Table

The documentary record presently includes the following attended observation records:

Date	Location	Observation Type	Relation to NCTP Receiver
10 Mar 2021	Horsehill Road	Additional observation	~1.4 km from H18aa
10 Mar 2021	Midland Highway	Additional observation	~1.5 km from H18aa
31 Mar 2021	K15aa	PCNA Appendix D observation	NCTP receiver
31 Mar 2021	H18aa	PCNA Appendix D observation	NCTP receiver
31 Mar 2021	L18aa	PCNA Appendix D observation	NCTP receiver

This table is provided solely as a record organisation aid.

20. Record Preservation Statement

The Supporting Record and Analytical Memorandum and associated annex material have been compiled for the purpose of preserving the documentary record relating to the regulatory framework governing the Lal Lal Wind Farm.

The materials referenced within the memorandum are derived from documents appearing on the disclosed regulatory, project, and public record, including:

- consultant reports
- environmental auditor verification statements
- regulatory correspondence
- Freedom of Information decisions and disclosed material
- planning authority documentation

- governing instruments and associated compliance instruments
- publicly available operational information.

The memorandum records chronology, document references, and interactions appearing within that record.

No underlying document has been altered, summarised in a manner that changes its meaning, or substituted with interpretive material.

Where the memorandum identifies interactions or apparent inconsistencies between documents, those matters are recorded solely as descriptors of the disclosed record and are not advanced as findings of fact, law, compliance, or liability.

The memorandum should therefore be read as a documentary compilation and preservation of the regulatory record relevant to the Lal Lal Wind Farm monitoring and compliance framework.

Interpretation of statutory instruments, regulatory obligations, and evidentiary sufficiency remains a matter for the relevant regulatory authorities or competent courts.

Document Closure Statement

Version

1.1 of the Supporting Record and Analytical Memorandum records the documentary material identified within the regulatory and project record as at 16 March 2026.

This memorandum preserves the chronology and interactions between those materials as disclosed at that date.

The document is executed as a closed record of the materials presently identified.

Any additional material that may later become available through regulatory disclosure or Freedom of Information processes may be recorded separately if required.

No further revision to Version 1.1 is intended following execution.

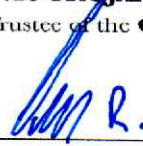
Execution

Executed on 16 March 2026

Prepared by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

as Trustee of the **Owen Robert Inter Vivos Trust**

By:  R.

Name: Owen Lewis

Title: Director

Date: 16 / 03 / 2026