LEWIS TROJAN HORSE PTY LTD

SUPPORTING RECORD AND ANALYTICAL MEMORANDUM

Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Version 1.2 (Supplementary — FOI, OVIC, Custody, Regulatory Transition and Regulatory Record Reconciliation)

Document Control

Document Title

Supporting Record and Analytical Memorandum
Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation

Version History

(a) Version 1.0 — dated 7 March 2026
(b) Version 1.1 — dated 16 March 2026
(c) Version 1.2 — dated 6 June 2026

Prepared by

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

Version Control Note

1.

Version 1.0 (and Version 1.1, where applicable) of this Memorandum was previously provided to relevant regulatory authorities.

2.

Version 1.2 is issued to record:

(a) the outcomes of Freedom of Information processes;
(b) associated review through the Office of the Victorian Information Commissioner (OVIC);
(c) supplementary observations arising from review of the disclosed regulatory record; and
(d) the amendment of Planning Permit PL-SP/05/0461-2 and associated regulatory transition material.

3.

For the avoidance of doubt:

(a) Version 1.0 and Version 1.1 remain unchanged;
(b) Version 1.2 does not amend, replace, or retrospectively alter earlier versions; and
(c) Version 1.2 is to be read together with earlier versions for completeness of the record.

1. Purpose

1.1

This Memorandum records, in structured form, elements of the regulatory and documentary record concerning the Lal Lal Wind Farm.

1.2

The material recorded:

(a) does not assert breach, fault, or non-compliance;
(b) does not seek enforcement action or outcome; and
(c) is provided for record purposes only.

1.3 Observational Context (Supplementary)

1.3.1

Without altering the purpose of this Memorandum, the material recorded is capable of being read as raising a question concerning the operation of the regulatory framework as applied.

1.3.2

That question arises from the relationship between:

(a) mandatory requirements expressed within endorsed instruments;
(b) the methodology adopted in assessment and verification; and
(c) the documentary basis upon which regulatory positions have been formed.

1.3.3

This Memorandum does not determine that question and records it for completeness of the regulatory record only.

2. Documentary Record

2.1

The documentary record comprises:

(a) Planning Permit PL-SP/05/0461-2, associated amendment material, and amended permit conditions;
(b) the endorsed Noise Compliance Testing Plan;
(c) post-construction noise assessment material;
(d) environmental auditor verification material; and
(e) regulatory correspondence across relevant agencies.

2.2 Freedom of Information, OVIC, and Custody Outcomes (Supplementary)

2.2.1

Subsequent to earlier versions of this Memorandum, the Trustee undertook Freedom of Information processes and associated record review concerning:

(a) Moorabool Shire Council;
(b) Environment Protection Authority Victoria; and
(c) Department of Transport and Planning material relevant to document custody and regulatory reliance.

2.2.2

EPA Freedom of Information and OVIC review outcomes are recorded in Annex C Version 1.1.

2.2.3

Council and Department of Transport and Planning custody and reliance matters are recorded in Annex D.

2.2.4

Those outcomes identify:

(a) documents not identified within agency records;
(b) documents identified but not disclosed;
(c) documents disclosed and forming part of the available regulatory record; and
(d) document classes not identified as held following searches recorded through FOI and OVIC processes.

2.2.5 Governance Correspondence — Administrative Record Clarification

2.2.5.1

Subsequent to the Freedom of Information outcomes referred to above, the Trustee issued correspondence to Moorabool Shire Council dated 22 April 2026 and 1 May 2026 seeking administrative record clarification in relation to:

(a) commissioning and permit-trigger timing matters;
(b) meteorological monitoring facility authorisation matters; and
(c) the documentary and administrative basis upon which certain positions appearing within the available record had been formed or relied upon.

2.2.5.2

The correspondence was issued for record purposes only and did not:

(a) assert breach, wrongdoing, or legal consequence;
(b) seek enforcement action or outcome; or
(c) purport to determine the legal effect of the matters identified.

2.2.5.3

By correspondence issued by Governance, Moorabool Shire Council recorded that:

(a) decisions had been made and issued in relation to the relevant Freedom of Information requests;
(b) the statutory Freedom of Information processes were considered complete; and

(c) Governance would not be providing any further response in relation to the matters raised in the Trustee's correspondence.

2.2.5.4

The Governance correspondence does not identify:

(a) any additional documentary material concerning commissioning, permit-trigger timing, or meteorological monitoring facility authorisation;
(b) any documentary or legal basis relied upon in relation to the matters identified within the Trustee's correspondence; or
(c) any correction to the chronology or documentary record as summarised within the Trustee's correspondence.

2.2.5.5

This section records the conclusion of Governance engagement in relation to the Trustee's administrative record clarification correspondence.

It does not determine:

(a) the legal or administrative effect of the Governance correspondence; or
(b) the completeness of the underlying regulatory or administrative record.

2.2.6 Planning Permit Amendment and Regulatory Transition Record (Supplementary)

2.2.6.1

Subsequent to the material recorded within earlier versions of this Memorandum, a determination was issued approving amendment of Planning Permit PL-SP/05/0461-2.

2.2.6.2

The amendment records:

(a) amendment of Condition 23;
(b) deletion of Conditions 24–27; and
(c) insertion of Condition 27A.

2.2.6.3

The disclosed amendment material records that operational wind turbine noise governance is to occur through the Environment Protection Regulations 2021 framework, including the Noise Management Plan framework established under regulation 131E.

2.2.6.4

The amendment material further records:

(a) consultation between the operator and Environment Protection Authority Victoria concerning the proposed amendment pathway; and
(b) that EPA expressed support for the proposed amendment.

2.2.6.5

The disclosed amendment material records that the amendment was presented as administrative alignment between the planning permit framework and the Environment Protection Regulations 2021 framework.

2.2.6.6

The disclosed amendment application material records that the existing Planning Permit identified:

(a) "Responsible Authority for Administration and Enforcement of this permit: Moorabool Shire Council"; and
(b) operative permit wording expressly authorising "two permanent meteorological monitoring facilities and associated equipment".

2.2.6.7

The amendment application material further records that:

(a) the amendment proposal was directed toward amendment of Condition 23, deletion of Conditions 24–27, and associated transition of operational wind turbine noise governance to the Environment Protection Regulations 2021 framework;
(b) the proposal was characterised as administrative and regulatory alignment between the planning permit framework and the Environment Protection Regulations 2021 framework; and
(c) "The proposal does not seek to alter any other conditions of the permit."

2.2.6.8

The amended Form 11 permit subsequently issued records:

(a) "Responsible authority: Minister for Planning"; and
(b) operative permit wording framed in broader planning-scheme authorisation terms without express repetition of the earlier wording referring to "two permanent meteorological monitoring facilities and associated equipment".

2.2.6.9

The presently disclosed amendment application material does not identify:

(a) a specific amendment request directed toward alteration of the responsible authority wording itself; or
(b) a specific amendment request directed toward removal of the earlier operative wording referring to "two permanent meteorological monitoring facilities and associated equipment".

2.2.6.10

This section records the documentary evolution of the permit wording and amended permit structure as disclosed within the amendment material only.

It does not determine:

(a) the legal effect of the amended wording;
(b) the continuing approval basis for any meteorological monitoring infrastructure;
(c) the allocation of statutory functions between the Minister for Planning and Moorabool Shire Council; or
(d) whether the amended permit wording reflects substantive amendment, administrative drafting modernisation, or permit re-formatting.

2.2.6.11

The amendment and associated regulatory transition material are recorded separately within Annex E — Planning Permit Amendment and Regulatory Transition Record.

2.2.6.12

This section records the occurrence of the amendment and associated transition framework within the disclosed record only.

It does not determine:

(a) the legal effect of the amendment;
(b) the sufficiency of the Environment Protection Regulations 2021 framework;
(c) whether all underlying documentary matters have been reconciled; or
(d) the regulatory effect of the transition framework recorded within Annex E.

2.2.7 Department of Transport and Planning FOI and OVIC Delay Complaint Record (Supplementary)

2.2.7.1

Subsequent to the Freedom of Information matters recorded within Annex D, complaints concerning delay in the processing of Department of Transport and Planning Freedom of Information Requests CS019200 and CS019241 were accepted by the Office of the Victorian Information Commissioner.

2.2.7.2

The documentary record establishes that:

(a) the requests were validated by the Department of Transport and Planning;

(b) statutory decision dates were identified by the Department;

(c) extension requests were subsequently made by the Department;

(d) a limited extension period was agreed by the Trustee;

(e) no decisions had been issued by the Department as at the expiry of the extension period agreed by the Trustee;

(f) subsequent requests for status information and anticipated decision timeframes were issued by the Trustee; and

(g) complaints concerning delay were accepted by the Office of the Victorian Information Commissioner.

2.2.7.3

By correspondence dated 5 June 2026 concerning Complaint C/26/01704 (Department reference CS019241), the Office of the Victorian Information Commissioner recorded information provided by the Department stating that:

(a) searches had been undertaken;

(b) relevant documents had been identified;

(c) third-party consultation under section 34 of the Freedom of Information Act 1982 (Vic) had commenced; and

(d) the Department was awaiting responses before proceeding to the decision-making stage.

2.2.7.4

The same correspondence records that:

(a) the Department advised the matter was being treated as a priority and actively progressed; and

(b) no specific anticipated decision date or decision timeframe was identified.

2.2.7.5

By correspondence dated 5 June 2026 concerning Complaint C/26/01675 (Department reference CS019200), the Office of the Victorian Information Commissioner recorded information provided by the Department stating that:

(a) the Department was working with the relevant business area to undertake appropriate and comprehensive searches;

(b) the Department recorded that search activities and associated business-area engagement remained in progress;

(c) assessment of potentially relevant documents remained underway; and

(d) no specific anticipated decision date or decision timeframe was identified.

2.2.7.6

The Office of the Victorian Information Commissioner further recorded in relation to both matters that:

(a) no decision had been issued within the timeframe required by the Freedom of Information Act 1982 (Vic);

(b) the Department was taken to have refused the requests under the Act; and

(c) review rights before the Victorian Civil and Administrative Tribunal were available.

2.2.7.7

The documentary record therefore establishes that, as at 5 June 2026:

(a) the Department of Transport and Planning Freedom of Information processes remained ongoing;

(b) OVIC complaint processes remained active;

(c) CS019241 had progressed to document identification and third-party consultation stages;

(d) CS019200 remained subject to search and assessment processes; and

(e) no anticipated timeframe for decision had been identified by the Department.

2.2.7.8

The amendment of Planning Permit PL-SP/05/0461-2 referred to at Section 2.2.6 was determined during the period in which Freedom of Information Requests CS019200 and CS019241 remained unresolved.

2.2.7.9

This section records the procedural status of the Freedom of Information and OVIC processes as disclosed within the documentary record as at 5 June 2026 only.

It does not determine:

(a) the adequacy of searches undertaken by the Department;

(b) the correctness of any position communicated by the Department or OVIC;

(c) the outcome of the Freedom of Information processes; or

(d) the legal or administrative effect of any document subsequently disclosed or identified.

3. Commissioning and Commencement

3.1

The documentary record contains multiple references to commissioning and operational status at different points in time.

3.2

These references include:

(a) commissioning of individual turbines;
(b) commissioning of the wind farm as a whole; and
(c) commencement of export to the electricity grid.

3.3

The sequencing and terminology applied across documents is not expressed in a single unified form.

3.4 FOI Outcomes — Commissioning Records (Supplementary)

3.4.1

The Freedom of Information decision issued by Moorabool Shire Council records that no documents were identified within the scope of the request.

3.4.2

The scope of that request included:

(a) commissioning certificates;
(b) formal notification of commissioning; and
(c) internal milestone or register records.

3.4.3

The Council advised that all reasonable steps were taken and that no such documents exist or could be found.

4. Monitoring and Measurement Infrastructure

4.1

The documentary record includes reference to monitoring infrastructure associated with the wind farm.

4.2

Such infrastructure forms part of the context in which noise monitoring and assessment is undertaken.

4.3 FOI Outcomes — Meteorological Monitoring Facility (Supplementary)

4.3.1

The Freedom of Information decision issued by Moorabool Shire Council records that no documents were identified within the scope of the request for formal approval, consent, authorisation, or endorsement.

4.3.2

Correspondence was identified but determined to fall outside the defined scope and was released administratively.

5. Complaint Handling and Regulatory Response

5.1

The documentary record includes reference to pollution reports and complaint handling processes.

5.2

These processes involve:

(a) receipt and registration of reports;
(b) internal assessment; and
(c) communication of regulatory position.

5.3 FOI Outcomes — Complaint Handling Records (Supplementary)

5.3.1

The Freedom of Information process resulted in:

(a) an initial decision refusing access in full; and
(b) a subsequent reconsidered decision granting access in part.

5.3.2

The decisions record that:

(a) documents exist but were not disclosed in full; and
(b) certain material comprises internal working or deliberative material.

6. EPA Regulatory Position and Reliance

6.1

The documentary record includes material relied upon by the Environment Protection Authority Victoria in forming and communicating regulatory positions.

6.2

This includes:

(a) post-construction noise assessment reports;
(b) environmental auditor verification reports; and
(c) associated regulatory correspondence.

6.3 FOI Outcomes — EPA Records (Supplementary)

6.3.1

The Freedom of Information decision identifies documents including:

(a) post-construction noise assessment reports;
(b) environmental auditor verification reports;

(c) pollution report and enquiry records; and
(d) statutory notice material and responses.

6.3.2

The decision records that:

(a) access was granted in full or in part to the majority of documents; and
(b) access was refused in full to one document.

6.3.3 FOI-100-2025 — Decision Scope and Document Identification

6.3.3.1

The documentary record includes a Freedom of Information request issued to the Environment Protection Authority Victoria seeking documents including:

(a) pre-construction, baseline, and compliance noise assessment material and associated auditor verification documentation;
(b) noise management plan material and associated auditor verification documentation;
(c) shadow flicker assessment material; and
(d) authorising documents and/or instruments altering or modifying the requirements of NZS 6808:2010.

6.3.3.2

The notice of decision dated 25 September 2025 identifies documents falling within the scope of the request.

6.3.3.3

The notice of decision does not record determinations in respect of all categories of documents within the scope of the request.

6.3.3.4 OVIC Outcome — Decision Status

Subsequent to the notice of decision dated 25 September 2025, the handling of FOI-100-2025 has been the subject of review through OVIC.

The documentary record establishes that:

(a) only one notice of decision has been issued;
(b) that notice identified a subset of documents;
(c) no further notice of decision has been issued determining remaining parts;
(d) the Agency stated that any deficiencies were addressed through submissions made during the OVIC process; and
(e) OVIC proceeded on the basis that no further action is required.

On the present record, the FOI request is treated as determined notwithstanding that not all parts of the request have been the subject of a further notice of decision.

6.3.3.5 OVIC Outcome — Foundational Document Classes

The OVIC process records that, following a "thorough and diligent search", no documents were located in relation to multiple parts of the FOI request.

Those parts include document classes comprising:

(a) pre-construction and predictive noise assessment material and associated auditor verification documentation;

(b) baseline and compliance monitoring material and associated auditor verification documentation;
(c) shadow flicker assessment material; and
(d) authorising documents and/or instruments altering or modifying the requirements of NZS 6808:2010.

On the present record, no documents within those categories have been identified as held by the Agency.

6.3.3.6 OVIC Determination (28 April 2026)

6.3.3.6.1
By correspondence dated 28 April 2026 (ref: C/26/00319), the Office of the Victorian Information Commissioner determined to dismiss the complaint under section 61B(1)(b) of the Freedom of Information Act 1982 (Vic).

6.3.3.6.2
The determination records that:

(a) a notice of decision dated 25 September 2025 was issued by the Environment Protection Authority Victoria;
(b) documents identified in that decision were released following payment of access charges; and
(c) no further action would be taken by the Office of the Victorian Information Commissioner.

6.3.3.6.3
The determination further records that:

(a) the Environment Protection Authority Victoria undertook a "thorough and diligent search" for documents; and
(b) no documents were located in relation to multiple parts of the request, including document classes referred to at 6.3.3.5.

6.3.3.6.4
The determination records that concerns were raised regarding the adequacy of the notice of decision, including whether it:

(a) stated whether documents exist or do not exist following reasonable searches;
(b) set out findings on material questions of fact; and
(c) provided reasons in respect of all parts of the request.

6.3.3.6.5
The determination records that:

(a) the notice of decision "could have provided further information" in respect of certain parts of the request; and
(b) the matters raised were addressed through the complaint process, and no further action was warranted.

6.3.3.6.6
On the present record, the FOI process is treated as concluded following the OVIC determination.

6.3.3.6.7
This section records the outcome of the OVIC review process and does not determine:

(a) the legal effect of the determination; or
(b) whether the notice of decision satisfies the requirements of section 27(1) of the Act.

6.3.3.7 EPA Legal Branch Correspondence — Regulatory Position

6.3.3.7.1
By correspondence issued by EPA Legal Branch subsequent to provision of the Trustee's correspondence dated 17 March 2026, 16 April 2026 and 5 May 2026, the Environment Protection Authority Victoria recorded that:

(a) the material previously provided by the Trustee had been considered;
(b) the EPA maintains its position that the Lal Lal Wind Farm is currently complying with its obligations under the Environment Protection Act 2017 (Vic) and Environment Protection Regulations 2021 (Vic); and
(c) EPA would not be taking further regulatory action at that time.

6.3.3.7.2
The correspondence further recorded that:

(a) EPA would continue to monitor compliance with obligations arising under the Act and Regulations; and
(b) future enquiries and pollution reports would be triaged through EPA's Contact Centre and assessed according to EPA's usual processes.

6.3.3.7.3
The correspondence was issued following provision to the EPA of:

(a) Supporting Record and Analytical Memorandum Version 1.0 and Version 1.1;
(b) supplementary Annex material; and
(c) associated Trustee correspondence concerning chronology, regulatory reliance, document custody, and framework sequencing matters.

6.3.3.7.4
The correspondence does not identify:

(a) any further reconciled explanation concerning the matters recorded within Sections 3, 6.5, 6.7, 6.8 or 6.9 of this Memorandum;
(b) any identified authorising instrument modifying or varying the requirements of NZS 6808:2010 or the endorsed Noise Compliance Test Plan; or
(c) any alteration to the EPA's previously communicated regulatory position.

6.3.3.7.5
This section records the continuation of the EPA's regulatory position following consideration of the material provided by the Trustee.

It does not determine:

(a) the correctness of that position;
(b) the legal effect of the correspondence; or
(c) the regulatory effect of the matters identified elsewhere within this Memorandum.

6.4 Earlier PCNA Material

6.4.1

The EPA decision records that an earlier version of the Stage 1 PCNA report:

(a) was superseded by a later revised version; and
(b) was of negligible relevance.

6.5 SCADA Data Timing — Interim and Post-Construction Assessment

6.5.1

The documentary record includes reference to SCADA data utilised in the derivation and verification of noise assessment results across both Stage 1 and Stage 2 post-construction noise assessments.

6.5.2

That record indicates that SCADA datasets were applied to correlate operational turbine conditions with measured acoustic data, including interim and post-construction compliance monitoring periods.

6.5.3

The record includes reference to monitoring undertaken during periods in which:

(a) turbines were installed;
(b) turbines were undergoing commissioning; and
(c) turbines were operating under constrained or partial generation conditions.

6.5.4

The material does not identify a unified framework within which SCADA datasets are:

(a) delineated between pre-construction, commissioning, and operational phases; or
(b) mapped to the procedural timing requirements expressed within the Noise Compliance Test Plan.

6.5.5

This section records the temporal relationship between SCADA data utilisation and monitoring periods on the disclosed record only.

It does not determine the adequacy, appropriateness, or regulatory effect of that utilisation.

6.6 Aurecon Memorandum — Repeated Use Across PCNA Reporting

6.6.1

The documentary record includes reference to an Aurecon memorandum utilised within post-construction noise assessment reporting.

6.6.2

That memorandum is referenced across multiple reporting contexts, including Stage 1 and subsequent revised or consolidated reporting material.

6.6.3

The record indicates that the memorandum is relied upon as part of the analytical framework supporting interpretation of monitoring data and assessment outcomes.

6.6.4

The disclosed material does not identify:

(a) whether the memorandum was prepared for a specific monitoring stage;
(b) whether its application varies across reporting contexts; or
(c) whether it was subject to independent verification within each instance of reliance.

6.6.5

This section records the repeated use and reliance upon the Aurecon memorandum within the disclosed record.

It does not determine the scope, applicability, or evidentiary weight of that memorandum.

6.7 NCTP Sequencing — "Prior to Commencement"

6.7.1

The endorsed Noise Compliance Test Plan includes requirements expressed as occurring "prior to commencement" of operation.

6.7.2

The documentary record includes multiple references to:

(a) turbine installation;
(b) commissioning activities; and
(c) commencement of operation, as recorded across consultant reports, auditor material, and regulatory correspondence.

6.7.3

The record also includes monitoring undertaken during periods in which turbines were:

(a) installed; and
(b) operating to varying extents during commissioning and ramp-up phases.

6.7.4

The disclosed material does not present a single reconciled statement identifying:

(a) the point at which "commencement of operation" is taken to occur for the purposes of the Noise Compliance Test Plan;
(b) how monitoring undertaken during commissioning or partial operation is treated relative to requirements expressed as occurring prior to commencement; or
(c) how such sequencing is reflected within the regulatory record relied upon for compliance assessment.

6.7.5

This section records the sequencing of monitoring and operational references on the disclosed record only.

It does not determine the interpretation or application of "prior to commencement" within the regulatory framework.

6.8 Attended Observations (SAC)

6.8.1

The documentary record includes attended observations relied upon in the identification of Special Audible Characteristics (SAC), as recorded within post-construction noise assessment reporting.

6.8.2

The identification and assessment of SAC within the post-construction noise compliance framework is governed by the procedural requirements recorded in Annex B, as derived from NZS 6808:2010 and the Noise Compliance Test Plan.

6.8.3

The reporting material records attended observations as discrete listening events undertaken during monitoring programs.

6.8.4

Annex B (as previously issued) records the procedural framework governing SAC identification, including:

(a) the requirement for attended observations to be undertaken in defined sets;
(b) the requirement for observations to occur during specified monitoring stages; and
(c) the requirement for structured and complete reporting of those observations.

6.8.5

Annex B Version 1.1 records additional observations concerning the temporal distribution of attended observations within the Stage 2 monitoring program, including:

(a) the presence of defined monitoring intervals; and
(b) the absence, on the face of the disclosed material, of identified attended observations corresponding to certain intervals.

6.8.6

This section records the relationship between attended observations and the monitoring record as disclosed.

It does not determine whether attended observations were undertaken, omitted, or sufficient for the purposes of SAC identification.

6.9 Auditor Verification -- SAC Observations

6.9.1

Environmental auditor verification material forms part of the documentary record relied upon within the post-construction noise compliance framework.

6.9.2

That material records that verification was undertaken in relation to compliance with planning permit conditions and the Noise Compliance Test Plan.

6.9.3

The auditor has acknowledged that the term "shall", as used within NZS 6808:2010 and the Noise Compliance Test Plan, denotes mandatory requirements.

6.9.4

The disclosed record indicates that SAC identification forms part of the compliance framework assessed within post-construction noise assessment reporting.

6.9.5

The auditor verification material records acceptance of the reporting and assessment material as presented.

6.9.6

The disclosed record does not identify how that acceptance is reconciled with the mandatory procedural requirements referred to in 6.9.3.

6.9.7

This section records:

(a) the scope of auditor verification as disclosed; and
(b) the relationship between that verification and SAC identification material recorded in Sections 6.8 and Annex B.

6.9.8

This section does not determine:

(a) whether SAC identification procedures were satisfied;
(b) whether verification extends to all aspects of SAC identification; or
(c) the regulatory effect of the verification material.

7. Record Integration

7.1

This Memorandum is to be read together with:

(a) Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
(b) Annex B — SAC-01 Record of Special Audible Characteristics;
(c) Annex B Version 1.1 — SAC-01 Supplementary Record;
(d) Annex C — EPA Internal Review Correspondence and Regulatory Reliance Record;
(e) Annex C Version 1.1 — EPA FOI and OVIC Review Supplementary Record;
(f) Annex D — Cross-Agency Custody and Reliance Record; and
(g) Annex E — Planning Permit Amendment and Regulatory Transition Record.

7.2

The Annexes are discrete records and should be read together for completeness.

No Annex is intended to amend, replace, or retrospectively alter any earlier issued material unless expressly stated.

8. Status

8.1

This Memorandum is provided for record purposes only.

8.2

It:

(a) does not assert breach;
(b) does not determine legal effect;
(c) does not seek enforcement action.

8.3 Supplementary Status (Version 1.2)

8.3.1

This Version records:

(a) FOI outcomes;
(b) OVIC review outcomes;
(c) document custody matters;
(d) supplementary regulatory-record observations arising from review of the disclosed material;
(e) the amendment of Planning Permit PL-SP/05/0461-2 and associated regulatory transition material; and
(f) Annex E — Planning Permit Amendment and Regulatory Transition Record.

8.3.2

It does not:

(a) alter earlier versions;
(b) introduce retrospective interpretation;
(c) determine legal or regulatory conclusions; or
(d) assert that any agency, auditor, consultant, or operator has acted unlawfully.

Document Status — Executed Record

This document constitutes the executed Version 1.2 of the Supporting Record and Analytical Memorandum (Lal Lal Wind Farm — Regulatory Record Chronology and Reconciliation) and is to be read together with earlier versions and associated Annex material.

Version 1.2 is issued to record:

(a) the outcomes of Freedom of Information processes;
(b) associated review through the Office of the Victorian Information Commissioner (OVIC);
(c) supplementary observations arising from review of the disclosed regulatory record; and
(d) the amendment of Planning Permit PL-SP/05/0461-2 and associated regulatory transition material.

This document is to be read together with:

(a) Supporting Record and Analytical Memorandum Version 1.0 (7 March 2026);
(b) Supporting Record and Analytical Memorandum Version 1.1 (16 March 2026);
(c) Annex A — K15aa Record of Baseline Integrity and Regulatory Reliance;
(d) Annex B — SAC-01 Record of Special Audible Characteristics;

(e) Annex B Version 1.1 — SAC-01 Supplementary Record;
(f) Annex C — EPA Internal Review Correspondence and Regulatory Reliance Record;
(g) Annex C Version 1.1 — EPA FOI and OVIC Review Supplementary Record;
(h) Annex D — Cross-Agency Custody and Reliance Record; and
(i) Annex E — Planning Permit Amendment and Regulatory Transition Record.

This document is provided for record purposes only and does not assert breach, fault, liability, or non-compliance.

Execution

Executed by

LEWIS TROJAN HORSE PTY LTD (ACN 693 680 509)

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

By: ______________________

Name: Owen Lewis

Title: Director

Date: 06 / 06 / 2026