

## Rye Park Wind Farm: Independent Environmental Audit (28-29 February 2023)

This document represents the response of Rye Park Renewable Energy Pty Ltd (the Applicant) to the action items identified by Molino Stewart in undertaking the independent environmental audit of the Rye Park Wind Farm (the Development) (Section 1) as well as a general response to specific audit findings that have not resulted in any recommendations as part of the audit report (Section 2).

### 1. Specific Actions

Item No.	Audit Recommendations / Corrective actions against opportunities for improvement	Applicants proposed action and timing	Action status
1	<p><b>Schedule 2 Condition 15: Operation of plant and equipment</b></p> <p>Opportunity of improvement:</p> <ul style="list-style-type: none"> <li>“Ensure service history records of all plant and equipment are completed kept up to date”</li> </ul>	<p>The Applicant’s contractors check mobile plant for ongoing service compliance through specific and mobile plant HSE Inspections. Evidence has been provided with this response of completed mobile plant inspections and these will continue to ensure that all plant is maintained in a proper and efficient condition in line with the requirements of the Development Consent.</p>	Ongoing through construction.
2	<p><b>Schedule 3 Condition 18 (b): Soil and water – Operating Conditions</b></p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> <li>“Regularly maintain erosion and sediment controls and specifically: <ul style="list-style-type: none"> <li>Regularly maintain rock check dams</li> <li>Stabilise batters and cable runs immediately after works are completed</li> <li>Ensure standpipes do not overflow onto steep un stabilised slopes</li> <li>Ensure sediment fencing is maintained downstream of disturbed surfaces”</li> </ul> </li> </ul>	<p>The Applicant’s contractors undertake weekly inspections that access erosion and sediment controls as well as specific HSE inspections, which are completed following large (20mm+) rain events. These inspections are proposed to be continued and ongoing assessment of the adequacy of these controls will be monitored on this basis.</p> <p>It is noted that the majority of the bulk earthworks for the Development is complete and entering into the next phase of the construction works, the Applicant is progressively reinstating, stabilising and rehabilitating areas disturbed as part of the initial construction activities. Activities currently being undertaken by the Applicant’s contractors include placement of topsoil and seeding in accordance with the requirements of the approved Biodiversity Management Plan. Monitoring and documentation of the progressive rehabilitation, including ground cover percentage achieved is undertaken on a monthly basis.</p> <p>Supporting evidence of the ongoing inspections referenced above has been provided with this response.</p>	Ongoing through construction.
3	<p><b>Schedule 3 Condition 18 (f): Soil and Water – Operating Conditions</b></p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> <li>“Ensure all hazardous liquids are stored with bunding and that spill kits are replenished as they are used”</li> </ul>	<p>Hazardous chemicals are spot checked by the Applicant’s contractors as part of the weekly inspections and specifically through HSE inspections. The drums identified as part of the independent audit that were not appropriately banded were put on a banded pallet on the day of the inspection (28 February 2023) and removed from the Site the following week.</p> <p>Supporting evidence of the removal of the identified drums and of the regular inspection program have been attached for reference.</p>	Closed in relation to specific action identified and inspections ongoing through construction.

Item No.	Audit Recommendations / Corrective actions against opportunities for improvement	Applicants proposed action and timing	Action status
4	<p><b>Schedule 3 Condition 25 (a): Heritage – Heritage Management Plan</b></p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> <li>• <i>“Update the Heritage Management Plan by:</i> <ul style="list-style-type: none"> <li>– <i>Listing the total number of sites salvaged to include those associated with Mod 2.</i></li> <li>– <i>Reflecting in the consultation log all consultation taken in relation to Mod 2.”</i></li> </ul> </li> </ul>	<p>The Applicant acknowledges the comments with regard to the Heritage Management Plan and further consultation undertaken with Heritage NSW. The Applicant confirms that there is some further clarification that could be provided in the approved Heritage Management Plan to confirm the specific sites that have been salvaged due to the Development (and confirm that the salvage and repatriation of relevant artefacts was ongoing at the time the Plan was approved). Due to the minor changes to the currently approved Plan as a result of the most recent revision (reflecting the changes as part of MOD 2), the consultation undertaken since the initial approval of the Plan was not updated and could be reflected in an updated version of the Plan.</p> <p>The Applicant will liaise with the Department of Planning and Environment (DPE) to update the Plan, should it be deemed appropriate considering the relevant management measures of the Plan remain unchanged. In accordance with Schedule 5, Condition 2 of the Development Consent, the Applicant is required to review and revise strategies, plans and programs required under the Development Consent and where revision is required a revised document must be submitted to the Planning Secretary for approval within 4 weeks of the review.</p>	<p>Revised Heritage Management Plan to be submitted to Planning Secretary within 4 weeks of further consultation with DPE and determination of requirement to update Plan.</p>
5	<p><b>Schedule 5 Condition 1: Environmental Management – Environmental</b></p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> <li>• <i>“Vestas to update its induction materials to include discussion of relevant environmental issues including cultural heritage issues.”</i></li> </ul>	<p>The Applicant’s contractor (Vestas) was identified to insufficiently be addressing all environmental aspects and environmental management as part of the site induction materials during the independent audit. Since undertaking the audit, Vestas have updated their site induction and have supplied this to the independent auditor (6 April 2023), who has confirmed that the materials now adequately address all relevant aspects of environmental management for the Development.</p>	<p>Closed for specific action and all employees and subcontractors to comply with site induction requirements through construction.</p>
6	<p><b>Schedule 3 Condition 30: Transport – Traffic Management Plan</b></p> <p>Opportunity for improvement:</p> <ul style="list-style-type: none"> <li>• <i>“Implement an over dimensional and heavy vehicle booking system”</i></li> </ul>	<p>The Applicant’s contractor (Vestas) did not supply evidence of an over-dimensional and heavy vehicle booking system during the audit, however did confirm through the audit process that a delivery schedule and booking system was in place and in use. The Applicant has provided further supporting evidence with this response of the booking system, which will remain in operation for the duration of the over-dimensional and heavy vehicle movements.</p>	<p>Ongoing through construction (in relation to OSOM movements).</p>

## 2. General Response

Further to responding to the specific opportunities for improvement identified by Molino Stewart, the Applicant also seeks to respond to the audit findings through the consultation undertaken with Hilltops Council (Council) in relation to the upgrade and maintenance of public roads. The audit report and consultation undertaken with Council identifies potential dispute between the Applicant and Council regarding the standard of road upgrades and ongoing maintenance of the public road network associated with the Development, which is noted to be outside the scope of the independent audit.

The Applicant's view of this consultation is that it is not reflective of the Applicant's previous engagement with Council or how the Applicant continues to respond to issues, working closely and constructively with Council. Public road issues in particular have been made very challenging with the weather and regional flooding impacts last year and the Applicant has responded to those issues and others promptly, in close communication with all relevant councils, including taking steps to proactively support flood repair that are not the direct responsibility of the Applicant.

The Applicant acknowledges the requirement to upgrade relevant sections of the public road network for over-dimensional or heavy vehicle traffic and rehabilitate and/or make good any development-related damage to the designated over-dimensional and heavy vehicle route in accordance with the conditions of the Development Consent and approved plans for the Development. The Applicant commits to continuing to work constructively with all road authorities to ensure that the requirements of the Development Consent and any relevant authorisations are adhered to.