

# Independent Environmental Audit Boco Rock Wind Farm

OCTOBER 2023

**Prepared for:**

Squadron Energy

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Document control log

Rev	Date	Comments	Prepared by	Reviewed by
A	25/9/23	Initial Draft for Squadron Review	RP	AS
0	13/10/23	Final	RP	AS

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# 1 EXECUTIVE SUMMARY

Squadron Energy (SQE) commissioned SNC-Lavalin Australasia Pty Ltd (SNC-Lavalin) to undertake an Independent Environmental Audit (IEA) of the operational performance of the Boco Rock Wind Farm (BRWF) (the Project). The audit is required by Condition 4.2 of the Department of Planning and Environment (DPE) Development Consent MP09\_0103-MOD1 (the approval as modified 23 December 2022).

The approval for the Project allows for the construction of Stage One comprising 67 wind turbine generators (WTG), which has been operational since 2015, and the construction of up to 20 turbines in Stage Two with an increased tip height and a reduced number of Wind Turbine Groups (WTG's).

To complete this audit, SNC-Lavalin undertook a site inspection, interviewed key management and environmental technical staff, and reviewed relevant and available documents relating to the approval and to the ongoing management and monitoring of the site environmental aspects.

The site inspection was undertaken on 22 August 2023, with members of SQE team present. At the time of the audit the main site activities included operation and maintenance of the 67 WTGs in Stage One and ongoing management of land and infrastructure associated with the wind farm.

Although the requirement for this audit was not initiated until the finalisation of MOD 1 (23 December 2022), the audit has considered the period from the commencement of operation in 2015 to the current audit inspection on 22 August 2023 (8 years).

The audit included an assessment of compliance with the Ministers Conditions of Approval for the Project

The findings from the audit conclude:

- > The project has a documented Operational Environmental Management Plan including specialist subplans that address the key environmental issues. Sufficient evidence was provided that the management plans are effectively being implemented.
- > The site has been rehabilitated following the construction of Stage One, resulting in significant mitigation of environmental risks for dust, erosion, and water pollution.
- > A total of nine complaints were recorded in the complaints register since May 2018, with all of them recorded as closed out and no outstanding actions during the audit period.
- > One self-reported non-compliance was identified, which was reported to DPE and recorded with no further action required.

Overall, compliance with Project's conditions of approval is being achieved and the environmental risks associated with the operation of the wind farm is low.

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## 2 INTRODUCTION

### 2.1 BACKGROUND TO PROJECT

The BRWF (the Project) involves the current operation of 67 wind turbine generators (WTG) to provide clean wind energy. The wind farm is located around 15 kilometres (to site office and substation) southwest of Nimmitabel and 38 kilometres south of Cooma in the Snowy-Monaro Regional local government area of southern New South Wales (NSW).

BRWF is owned by the Electricity Generating Public Company of Thailand (EGCO). Squadron Energy (SQE) is contracted by EGCO to carry out asset management services, including project operations. General Electric (GE) is contracted by SQE to maintain the WTGs.

Approval and the Minister’s Conditions of Consent for the Major Project MP09\_0103 were issued on 9 August 2010. The original Project Consent (MP 09\_0103) allowed construction of up to 122 wind turbine generators, up to 152 meters tip height, to be constructed across two Stages.

BRWF Stage One has been operational since 2015 and comprises 67 WTGs with a tip height of 130m.

Under the original Project Consent, Stage Two, which has not been constructed, had approval for up to 55 WTGs.

Modifications to the Conditions of Consent were approved on 23 December 2022 (MP09\_0103-MOD1). The approval, as modified, provides for a reduced number of turbines in Stage Two. The modification provides for up to 20 turbines at a 200-metre tip height. Construction of Stage Two has not commenced.

An operational audit of Stage One was undertaken in August 2015 by NGH Environmental. The findings and recommendations of this operational audit have been reviewed and considered by this audit.

### 2.2 AUDIT TEAM

SNC-Lavalin has been appointed to undertake the Operational Performance Audit for the Project.

The SNC Lavalin Audit team received endorsement from the DPE Secretary to undertake the operational audit in their letter dated 5 April 2023 (Appendix A).

The SNC-Lavalin audit team is described in Table 1 below.

**Table 1 – Audit team**

Role	Name	Qualifications
Lead Auditor	Richard Peterson	Environmental Systems Auditor, SAI Global Master of Environmental Management BE (Civil)
Project Management Support	Alistair Smith	Master of Regional and Resource Planning (Dist.) BSc Geography/Geology

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## 2.3 AUDIT OBJECTIVES

The audit is required to be undertaken for Stage One following the insertion of Condition 4.2 requiring operational auditing in the conditions of approval with the determination of the Modification Application MP09\_0103-MOD1.

The key objective of this IEA is to:

- assess the environmental performance of the Project and whether it is complying with the requirements in the Approval (including the requirements of any approved strategy, plan or program)
- review the adequacy of the approved strategies, plans and programs
- recommend any appropriate measures to improve environmental performance of the Project

## 2.4 AUDIT SCOPE

The audit consisted of an assessment of compliance against:

- > Development Consent as modified (MP09\_0103-MOD-1)
- > Post approval documents, including an assessment of the effective implementation of Operational Environmental Management Plan and Sub-Plans
- > Environmental performance including but not limited to:
  - Actual impacts compared with predicted impacts in the Environmental Assessment (EA) for MP09\_0103
  - Physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
  - Incidents, non-compliances and complaints
  - Performance of the development, with regard to agency policy and environmental issues identified during consultation when developing the scope of the audit
  - Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project
- > A high-level assessment of whether the Operational Environmental Management Plan (OEMP) and Sub-Plans are adequate
- > Any matter considered relevant by the auditor.

## 2.5 CONSULTATION

In preparing for this audit, SNC-Lavalin consulted with the following agencies:

- > NSW Department of Planning and Environment (DPE)
- > NSW Environment Protection Authority (EPA)
- > Snowy Monaro Regional Council (Council)

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Responses were received from EPA and Council. Council did not raise any issues to be considered by the audit. It was noted that EPA visited the site on the 29 August 2023 with no issues raised by the EPA officers. EPA requested that soil and water management and operational noise be considered by the audit.

Evidence of consultation is provided in Appendix E.

## 2.6 AUDIT FREQUENCY AND PERIOD COVERED BY AUDIT

The requirement is for audits of Stage One and Stage Two to be conducted and carried out at the frequency described in accordance with the Independent Audit Post Approval Requirements (2020) (PAR) as described in Table 2.

**Table 2 – Audit Frequency**

Phase	Initial Independent Audit	Ongoing Audit Intervals	Auditor Comment
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit, or as otherwise agreed by the Secretary	Not triggered as Stage Two construction activities have not commenced. However the initial construction audit for Stage Two will be required to be undertaken within 2 months of the commencement of construction
Operation	Within 26 weeks of the commencement of operation	At intervals no greater than three years, or as otherwise agreed by the Secretary	This is the first operational audit for the wind farm initiated under MP09_0103-MOD-1. An extension to the timeframe for commencing the audit was granted until 31 August 2023 by DPE on 20 March 2023. Commencement of the audit and the audit site inspection was undertaken before this date, therefore compliance with the required timeframes has been achieved.
Closure/Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.	Not triggered as closure and rehabilitation activities are yet to commence.

Although the requirement for this audit was not initiated until the determination of MOD 1 (on 23 December 2022, the audit has considered the period from the commencement of operation in 2015 and the observations made in the operational audit conducted by NGH on 25 and 26 August 2015 to the current audit inspection on 22 August 2023 (8 years).

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### 3 AUDIT METHODOLOGY

#### 3.1 DEVELOPMENT OF AUDIT SCOPE

The audit scope was developed to ensure the Project was assessed against the NSW Major Project Approval MP09\_0103-MOD1 (Consolidated Conditions of Consent) for the operation of the Boco Rock Wind Farm Stage One (noting Stage Two has not commenced construction).

#### 3.2 SUMMARY OF AUDIT PROCESSES

To complete the audit, the following was undertaken:

- > Preliminary document review to familiarise the team with the project and their processes
- > Opening meeting
- > Site visit
- > Interview with key management and supervisory personnel
- > Review of documents and records on-site
- > Closing meeting
- > Follow up of residual matters

#### 3.3 SITE PERSONNEL

The following site personnel were in attendance during the audit site inspection:

- > Zeina Jokadar – Environmental Advisor, Squadron Energy
- > David Laing – Operation Manager, Boco Rock Wind Farm, Squadron Energy

#### 3.4 SITE INSPECTIONS

A site inspection was undertaken by the audit team on 22 August 2023. Representatives of SQE as detailed in Section 3.3 attended the site inspection.

The weather was partially cloudy, with mild temperature and periods of gusty winds. The westerly turbines of Stage One along Avon Lake Road and Springfield Road were inspected including the “Lochlea” Biobank area. A detailed inspection of the site compound including the offices, maintenance and storage shed, waste and recycling storage areas, and the perimeter of the Project Collector Substation was undertaken. The following observations were made during the site inspection:

- > Site rehabilitation work has been completed with groundcover established across the entire site
- > Erosion and sediment controls consisting of permanent drainage, rock checks and lined drains were installed to minimise erosion risk. There were no waterways (creeks or rivers) within a visible distance of the site.

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- > Internal access roads were well graded and observed to be in good condition, cattle grids were installed to prevent any mud tracking onto local roads. There were some areas observed during the inspection where maintenance had been undertaken.
- > There was no excessive weed proliferation, or fugitive emissions of dust observed.
- > There was no residual construction waste or material stockpiles present on site. Minor waste volumes are produced by the facility with secure waste storage bins provided on site.
- > The workshop and laydown area were in good condition. Housekeeping was a high standard with no observed waste, rubbish spills or weeds present. Bunded, ventilated and covered containers were provided for chemical storage, with only minor quantities of chemicals stored on site.
- > Wind turbines and their masts were painted off white as required by the conditions of consent. Workshop areas were beige in colour to blend in with the surrounding environment.

Refer to Appendix B for site photographs and descriptions.

### 3.5 COMPLIANCE DESCRIPTORS

The compliance status of each requirement was determined using the relevant descriptors in Table 3. No other terms have been used to describe the compliance status.

**Table 3 – Compliance descriptors**

Status	Description
Compliant	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	One or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit was undertaken, or the condition has been previously addressed by previous audits

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## 4 AUDIT FINDINGS

### 4.1 ASSESSMENT OF COMPLIANCE WITH DEVELOPMENT APPROVALS

The Project was audited against Conditions of MP09\_0103-MOD1 with a total of one self-reported non-compliance identified during the reporting period. There is a high degree of compliance with the conditions of approval for the current operations. All conditions, including those not triggered at the time of the audit, are being proactively managed to ensure compliance.

All conditions of the Environmental Protection Licence (EPL) No. 20434 are recorded as complied with in each of the annual returns to the EPA from 2015 – 2023. There have been no complaints recorded in any of these EPL annual returns. There are no pollution monitoring requirements attached to the EPL.

As summary of the compliance status of the project is provided in Table 4.

**Table 4 – Compliance summary**

Subsection	Compliant	Non-Compliant	Not Triggered	Total
1 – Administrative Conditions	5	0	4	9
2 – Specific environmental conditions	23	0	33	56
3 – Environmental monitoring, auditing and reporting	1	0	3	4
4 – Environmental management, reporting and auditing	8	1	7	16
5 – Community Information, consultation, and involvement	4	0	1	5
6 – Environmental Management	1	0	2	3
<b>Total</b>	<b>42</b>	<b>1</b>	<b>50</b>	<b>93</b>

### 4.2 PENALTY NOTICES

No penalty notices have been issued during the period covered by the audit.

### 4.3 NON-COMPLIANCES

Non-compliances identified by the audit are presented in Table 5.

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**Table 5 – Non-Compliance**

Requirements	Details of Non-Compliance
<p><b>Condition 4.3 Environmental management, reporting and auditing</b></p> <p>The Proponent must:</p> <p>Update the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>Review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the;</p> <p>Submission of an incident report under 4.12;</p> <p>Submission of an audit report under condition 4.2; or</p> <p>Any modification to the conditions of this approval.</p>	<p>On 24 May 2023 Squadron Energy wrote to DPE to notify of a potential non-compliance with Condition 4.3 of MP09_0103-MOD1. The notification was made in respect of the requirement of Condition 4.3 to review and, if necessary, revise the strategies, plans and programs required under the approval to the satisfaction of the Planning Secretary within 3 months of any modification to the conditions of approval. Squadron Energy self-reported the non-compliance with Condition 4.3 in failing to revise the OEMP and BBAMP within 3 months of Modification 1, but noting other correspondence undertaken with DPE to address the scope and steps to make the necessary revisions to the management plans. On 7 June 2023 DPE responded to the self-reported non-compliance noting that it had recorded the breach with no further action as a revised OEMP and BBAMP had been received by DPE.</p>

#### 4.4 PREVIOUS AUDITS

As this is the first independent environmental audit undertaken in accordance with the 2020 Independent Audit Guideline (PAR) therefore there are no formal actions identified by previous audits that require assessment for completion. However, in 2015 Squadron Energy commissioned NGH in their Capacity as Independent Environmental Representative to undertake a broad audit of compliance with the Development Consent MP09\_0103, the Commonwealth Conditions of Approval and the Operational Environmental Management Plan. The audit was undertaken by the independent Environmental Representative.

In undertaking this audit, SNC-Lavalin reviewed the 2015 Audit report and noted the following key issues to be considered in the scope of this audit as follows:

- > Erosion and Sediment Control
- > Rehabilitation
- > Compliance management systems
- > Weed management.
- > OEMP review and update.

A summary of auditor observations in relation to the key issues identified by the 2015 audit are presented in Table 6.

**Table 6 – 2015 Audit – key focus areas**

2015 Audit – Key Issue	Auditor Observations
Erosion and Sediment Control	Construction works are now complete, the site is rehabilitated which provides effective groundcover to prevent erosion. Internal roads are

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2015 Audit – Key Issue	Auditor Observations
	<p>hardstand with permanent drainage and rock checks to prevent erosion and scouring.</p> <p>Regular inspections identify priority areas for maintenance. Several areas were inspected where road and drainage maintenance had recently been undertaken.</p>
Rehabilitation and weed management.	All rehabilitation work is complete with greater than 70% groundcover achieved. Routine weeding is undertaken with no proliferation of weeds observed.
Compliance management systems	<p>An experienced Environmental Advisor supports the Operation Manager in meeting compliance obligations. This includes routine site inspections undertaken by the Operation Manager and (minimum) six-monthly formal inspections undertaken by the Environmental Advisor.</p> <p>A comprehensive tracking program for compliance management and reporting has been implemented that is supported by Squadron Energy's compliance software program (Power BI). A summary of compliance is provided on the Project Website.</p>
OEMP Review and Update	The OEMP has been recently reviewed and updated to incorporate the requirements of the modified conditions of consent (for Stage Two), recommendations from the previous audit have been considered and incorporated into the updated OEMP where appropriate.

#### 4.5 REVIEW OF MANAGEMENT PLANS

The following management plans were reviewed:

- > Boco Rock Wind Farm Operational Environmental Management Plan, Issue 27/11/2014, Doc No: 141127\_BRWF\_OEMP\_WS\_RevE
- > Operational Environmental Management Plan, Boco Rock Wind Farm, 21 April 2023, Rev F **(Currently with DPE awaiting approval)**
- > Bird and Bat Adaptive Management Plan, Boco Rock Wind Farm, May 2023, BRWF BBMP v1.3.2 FINAL 20230525
- > BRWF Pollution Incident Response Management Plan, EPL 20434, 24 April 2023, Rev 5
- > Emergency Response Plan BRWF, 20 August 2023, Rev 5

These management plans were prominently displayed in the site office and displayed under the Planning and Approvals documentation on the Boco Rock Wind Farm website.

The management plans provide adequate environmental protection for the site. It is noted at the time of the audit, the OEMP was in progress of being updated with a final draft having been submitted to DPE and Squadron Energy awaiting approval from DPE.

#### 4.6 COMPLAINTS

There have been fifty-six (56) recorded community contacts with the Project registered since May 2018.

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The majority (47) of the community contacts are requests for information and other enquiries relating to employment opportunities, request for a site visit and/or business-related matters. A breakdown of the legitimate project complaints (9 complaints total) is provided below:

- Dust (2)
- Cattle grids and open gates (2)
- Accident/Incident – personal injury (2)
- Accident/Incident – fuel spill (1)
- Delay in legal proceedings for land sale (1)
- Other/unknown – (1)

No complaints have been received relating to key operational aspects including visual, noise, weed proliferation, or electromagnetic interference with television and radio reception.

#### 4.7 INCIDENTS

Since the previous operational audit, 2 environmental incidents have been recorded:

- > Diesel spill (approximately 40 litres) on the hardstand area near WTG 4 due to a vehicle reversing over an aluminium guide post resulting in a punctured fuel tank on 3 February 2021. Documented evidence was provided of receipts for disposal of contaminated soil to a waste facility, and corrective actions to avoid re-occurrence.
- > Oil spill (approximately 50 litres) from the failure of a transformer unit within the Project collector substation on 26 March 2022. The incident was reported to the EPA with no regulatory action taken.

The auditor assessed the nature and extent of these incidents and concluded that no offsite impacts occurred through either incident as all contaminants were contained on site and cleaned up effectively with no residual contamination observed by the auditor.

#### 4.8 ENVIRONMENTAL PERFORMANCE AGAINST ACTUAL AND PREDICTED IMPACTS

Table 7 provides a summary of the operational aspects identified in the EIS and the auditor's observations in relation to those aspects.

**Table 7 – Operational Environmental Aspects and Auditor Observations**

Operational Environmental Aspect	Auditor Observations
Visual	Rehabilitation and revegetation work has been completed for all non-trafficable areas. Revegetated appears to be greater than 70% ground cover in accordance with the Landscape/Rehabilitation Management Plan (Downer, 2014). The exterior of all turbines was off white colour in accordance with CoC 2.24. Workshop, site office and substation buildings were beige in colour and were in an area with low visual sensitivity with natural screening provided by the surrounding landscape.
Noise	Due to the rural nature of the site and distance of residents from the wind farm, the risk of community complaints and health effects are relatively low. No complaints relating to operational noise have been received during the audit period.  A Noise Compliance Testing (Sonus 2015) was undertaken after the commencement of operation of Stage One. Based on the results of this report, the noise generated due to the operation of wind turbines and ancillary infrastructures were compliant with

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Operational Environmental Aspect	Auditor Observations
	the Project's conditions of approval and the EPL. Therefore, no further testing has been undertaken since (in accordance with the Project's conditions of approval).
Cultural Heritage	The construction of wind turbines is now complete and there are no further planned activities which involves excavation or ground disturbance (for Stage One). There have been no reported incidents impacting cultural heritage during the audit period.
Flora and Fauna (Avifauna)	<p>Potential risks arise on birds and bats from either direct collision with WTG blades or towers.</p> <p>Since January 2015 to June 2023 during the operation of the Project, a total of 66 bird carcasses and 82 bat carcasses were identified through monthly avifauna monitoring. Among all species, the Eurasian Skylark (<i>Alauda arvensis</i>) was the most commonly found bird species (15), followed by the Australian Magpie (<i>Cracticus tibicen</i>) (10), and the White-striped Freetail Bat (<i>Austronomus australis</i>) the most commonly found bat species (59). Among the total carcasses over the eight-year period were three threatened species listed under either the NSW <i>Biodiversity Conservation Act 2016</i> or the Federal <i>Environment Protection and Biodiversity Conservation Act 1999</i>, or both, including the White-throated Needletail (<i>Hirundapus caudacutus</i>)(2), the Eastern Bentwing Bat (<i>Miniopterus orianae oceanensis</i>) (4), and the Grey Headed flying fox (<i>Pteropus poliocephalus</i>) (1).</p> <p>Annual reporting conducted by NGH Environmental from 2015 to April 2022 was reviewed in the audit. Overall, since operations commenced there has been a downward trend in the avifauna mortality rates which is consistent with other wind farm monitoring in Australia. The annual report from 2021 states that the average mortality rate at BRWF of 1.2 bats per turbine per year and 1.5 birds per turbine per year is well below calculations at other Australian wind farms. NGH confirm that the program is meeting its primary objective to detect collisions of birds and microbat species with turbines, and secondary objectives to detect bird population changes through bird utilisation surveys.</p>
Flora and Fauna (terrestrial)	<p>The operation of the facility has not impacted any terrestrial flora, as no further clearing of vegetation has been undertaken since the construction phase. Weeds were being controlled with areas of dead thistle observed. Hard stand areas around the WTGs were well maintained and free of weeds</p> <p>Terrestrial fauna or their habitat (kangaroos, possums etc) are not directly impacted by the operation of the facility.</p>
Traffic and Transport	<p>Roads were well formed and maintained and permanent drainage works had been completed including rock lined drains and culverts.</p> <p>Vehicle numbers on site are relatively low and consist largely of light vehicles accessing the site. One complaint was registered during the audit period with respect to cattle grids requiring cleaning due to soil accumulated, which was rectified with the grids being cleaned. No other complaints due to traffic management practices on site and no reported breaches of the traffic management plan were recorded.</p>
Aviation	The Civil Aviation Safety Authority (CASA) confirmed prior to construction that there was no recommendation for obstacle lighting as the WTGs will not be within the obstacle limitation surfaces for a certified or registered aerodrome. There have been no recorded impacts or issues in respect of aviation during the audit period.
Fire and Bushfire	There have not been any fires generated at this site or bushfires in the vicinity of the site during the audit period.

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Operational Environmental Aspect	Auditor Observations
	A 20kL water supply tank with a FRNSW compatible Storz hose fitting was not installed at the site. Squadron Energy noted that this is planned to be installed as part of the Stage 2 works, as this a new requirement added to the Conditions of Approval Modification 1.
Communications and Electromagnetic Interference	There are no reported impacts on radio communications, mobile phone reception and television reception due to electromagnetic interference during the audit period.
Soil and Water	<p>The site has been in the operational phase since 2015 and all earthworks, permanent drainage works, and rehabilitation have been completed.</p> <p>Fuels, oils and lubricants were appropriately stored undercover, on hardstand in appropriate enclosures and on banded pallets at the storage and maintenance depot. The site compound area is hardstand and spill kits are available to clean up any spilt material. There is a significant buffer distance between site operational activities and the nearest streams which means in the event of an on-site incident, the pollution of any local water courses is highly unlikely.</p> <p>Waste and recycling areas were kept tidy and there were no soil stockpiles or chemical spills observed.</p> <p>As required by the environmental protection licence (EPL) the site has prepared and has implemented a Pollution Incident Response Management Plan. The plan has been tested annually in accordance with the EPL.</p> <p>Groundcover provided by revegetated areas prevents runoff of soil into the creeks and operation of the project does not involve disturbance of soils.</p>
Air Quality	<p>The site is now in an operational phase and all earthworks, permanent drainage works, and rehabilitation have been completed.</p> <p>Vehicle numbers on site are relatively low, and there have been no complaints received during the audit period due to dust generation. The risk of wind-blown dust from within the project site has been substantially eliminated due to the high level of revegetation coverage.</p>
Waste	Volumes of waste generated on site is minimal. Appropriate waste storage practices were observed during the audit. There are no waste materials imported to or stored at the site.

Overall, a review of the Environmental Assessment (EA) and audit findings indicates that the activities being undertaken on site, and the impacts of the activities, are generally consistent with the predictions made in the EA. There was no work or activities undertaken outside the approved EA boundary.

#### 4.9 AUDIT RECOMMENDATIONS

Audit recommendations are outlined in Table 8.

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**Table 8 – Audit Recommendations**

Relevant condition and Key Requirements	Recommendation
<b>General Reporting and notification timeframes</b>	Ensure all future submissions of documents comply with DPE requirements for reporting timeframes
<b>2.32 – Bushfire Risk</b> The Proponent must: <ul style="list-style-type: none"> <li>a) Minimise the fire risks of the project, including managing vegetation fuel loads on site</li> <li>b) Ensure that the project               <ul style="list-style-type: none"> <li>• Complies with the relevant asset protection requirements for the RFS’s <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones:</li> <li>• Is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road;</li> </ul> </li> <li>c) Develop procedures to manage potential fires on site, in consultation with the RFS;</li> <li>d) Assist the RFS and emergency services as much as practicable if there is a fire or fire risk in the vicinity of the site; and</li> </ul> Notify the relevant local emergency management committee following construction of the project and prior to commencing operations of Stage Two.	Conduct a pre-bushfire season readiness review to ensure all the obligations made relating to fire prevention and emergency management are implemented and are fully functioning.
<b>5.4 – Complaints Management</b> The Proponent shall record details of all complaints received through the means listed under condition 5.3 of this approval in an up to date Complaints Register. The Register shall record but not necessarily be limited to; <ul style="list-style-type: none"> <li>a) Details of the complaint (such as date, time and how the complaint was made);</li> <li>b) The nature of the complaint;</li> <li>c) Any action(s) taken by the Proponent in relation to the complaint; and</li> <li>d) If no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</li> </ul> The Complaints Register must be kept up to date on the Proponents website, in accordance with condition 5.1 b), above.	For any future publication of complaints, provide more detail on the complaints register regarding the nature of the complaint and the specific actions taken to close the complaint out. There is currently limited information in the publicly available complaints register.

Report	Boco Rock Wind Farm – Operational Performance Audit	13 October 2023
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## 4.10 KEY STRENGTHS

Key Strengths are:

- > An experienced Environmental Advisor provides in-house capability in environmental and compliance management for the site and is supported by a wider environmental team managing all of Squadron Energy’s wind farm assets.
- > A compliance matrix has been developed as part of a new compliance programme (Power BI) which is a powerful compliance management tool with capacity to produce compliance reports, compliance dashboard status and notifications of reporting deadlines. The system automatically refreshes daily. the Squadron Energy CEO and Board has visibility of the system and the project compliance status.
- > A systematic approach is being undertaken to site compliance management. This includes 6 monthly site visits and compliance checks, by the Environmental Advisor as well as additional visits, and monthly site inspections by the Operation Manager.

Report	Boco Rock Wind Farm – Operational Performance Audit	13 October 2023
Project number	Squadron Energy	Rev 0



## APPENDICES

Report	Boco Rock Wind Farm – Operational Performance Audit	10 October 2023
Project number	Squadron Energy	Rev 0

## APPENDIX A – Planning Secretary Audit Team Approval

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Department of Planning and Environment

Miss Zeina Jokadar  
25 BOLTON STREET  
NEWCASTLE NSW 2300

05/04/2023

Dear Zeina Jokadar

**Boco Rock Wind Farm - (MP09\_0103)**  
**Boco Rock Wind Farm – Independent Environmental Audit team 2023 endorsement**

I refer to your request (MP09\_0103-PA-13) for the Secretary's approval of suitably qualified persons to undertake the Boco Rock Wind Farm – Stage one – 3-year operational Independent Environmental Audit (IEA) and prepare the IEA report as required under condition 4.2 of MP09\_0103 (the approval as modified).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of Mr Richard Peterson as Lead Auditor and Mr Alistair Smith as project management support (of SNC-Lavalin Atkins) to undertake the IEA and prepare the IEA report.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact me on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

## APPENDIX B – Site Inspection Photographs

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**Photo 1:** Avon Lake Road site entry. Stabilised site access and rumble grid to prevent mud tracking



**Photo 2:** Internal access roads and rehabilitation

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**Photo 3:** WTG pad free of weeds and well drained with n



**Photo 4:** Entry gate to "Lochlea" Biobank area.

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**Photo 5:** Compound maintenance and storage shed, oils stored on banded pallets in covered and hardstand area.



**Photo 6:** Spill kit and chemical storage area



**Photo 7:** Empty containers stored neatly on pallets on hard stand for collection, Bunded and ventilated chemical storage container



**Photo 8:** Waste and recycling storage for collection.

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Photo 9: Project Collector Substation.



Photo 10: Site operation management plans in site office.

## APPENDIX C – Independent Audit Compliance Table

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# BOCO ROCK WIND FARM OPERATIONAL AUDIT CHECKLIST

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>1 - ADMINISTRATIVE CONDITIONS</b>				
<b>Terms of Approval</b>				
<b>1.1</b>	<p>The project may only be carried out:</p> <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this approval;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally in accordance with the Environmental Assessment; and</li> <li>d) generally in accordance with the Project Layout in Appendix 1.</li> </ul>	<p>Operational Environmental Management Plan and associated Sub-Plans</p> <p>Site Inspection 22/7/23</p> <p>Audit Interview 22/7/23</p>	<p>The project is being undertaken in general accordance with the conditions of consent and the EA.</p> <p>An operational environmental management plan has been implemented with comprehensive systems for managing and reporting compliance. Reasonable and feasible measures were implemented on site.</p> <p>Only one self-reported administrative non-compliance with respect to timing for submission of operational management plans was recorded.</p>	<b>Compliant</b>
<b>1.2</b>	<p>If there is an inconsistency between the documents in condition 1.1, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.</p>	<p>Audit Interview 22/7/23</p>	<p>No inconsistencies identified</p>	<b>Not triggered</b>
<b>1.3</b>	<p>The Proponent must comply with any reasonable requirements(s) of the Planning Secretary arising from the Department's assessment of;</p> <ul style="list-style-type: none"> <li>a) any strategies, plans or correspondence that are submitted in accordance with this approval;</li> <li>b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and</li> <li>c) the implementation of any actions or measures contained in these documents.</li> </ul>	<p>Audit Interview 22/7/23</p>	<p>No request was made by the Planning Secretary, or report, reviews or audits commissioned by the Department for the operational stage.</p>	<b>Compliant</b>
<b>Limits of Approval</b>				

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
1.4	This approval shall not operate until the Proponent has demonstrated to the satisfaction of the Planning Secretary that an approval has been obtained for the construction and operation of the new 132 kilovolt overhead transmission line connection from the project to the existing high voltage electricity grid to the east of Nimmitabel, following due consideration of the cumulative impacts from the project and the new transmission connection. For the purpose of this condition, an approval means approval obtained from a relevant determining authority under Part 5 of the EP&A Act.	Letter of determination from Essential Energy dated March 2011 and DPE Letter dated 19/3/13  DPE Letter dated 19/3/13	DPE letter dated 19/3/13 confirms compliance with Condition 1.4 has been achieved noting that DPE have sighted evidence of the approval for the 132kV transmission line has been obtained from Essential Energy (approval dated 8 March 2011).	Compliant
1.5	This approval shall lapse five years after the date on which it is granted unless works the subject to this approval have physically commenced on site. However works cannot physically commence on site until the approval has been enacted in accordance with the requirements of condition 1.4. For the purposes of this condition works means all construction, operation and decommissioning activities associated with the project including those activities which are excluded from the definition of construction in Schedule 2.	Audit Interview 22/7/23  Site Inspection 22/7/23	Project has now been completed and has been operational since 2015.	Compliant
1.6	Deleted.			
<b>Decommissioning</b>				
1.7	Within 18 months of the cessation of operation of the project, the site shall be decommissioned and returned as far as practicable, to its condition prior to the commencement of construction in consultation with the relevant landowner(s) and to the satisfaction of the Planning Secretary. All generating facilities and associated infrastructure (including but not necessarily limited to the collector substation and transformers, overhead and underground transmission lines and control cabling and access roads) shall be removed from the site unless otherwise agreed by the Planning Secretary. Project related infrastructure (including access roads) may only be retained on site, where the Proponent has demonstrated to the satisfaction of the	Audit Interview 22/7/23  Site Inspection 22/7/23	Not triggered. The project is currently operational. This condition won't be triggered until decommissioning.	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	Planning Secretary prior to the commencement of decommissioning that these components: are permissible under the landuse provisions existing at the time of decommissioning would not pose an ongoing impediment to permissible landuse at the properties; and their retention has been agreed to by the relevant landowners.			
1.8	If any wind turbine is not used for the generation of electricity for a continuous period of 12 months, it shall be decommissioned by the Proponent, unless otherwise agreed by the Proponent, unless otherwise agreed by the Planning Secretary. The Proponent shall keep independently verified annual records of the use of wind turbines for electricity generation. Copies of these records shall be provided to the Planning Secretary upon request. The relevant wind turbine and any associated infrastructure is to be dismantled and removed from the site by the Proponent within 18 months from the date that the wind turbine was last used to generate electricity.	Audit Interview 22/7/23 Site Inspection 22/7/23 Squadron Energy Email dated 12/9/23	WTG46 has been idle since mid-March 2023 and has run intermittently since then.  WTG46 was not operational at the time of audit site inspection. Squadron Energy advised that this was due to lighting strike.	Compliant
<b>Lease Agreements</b>				
1.9	Prior to the commencement of construction of each stage of the project, the Proponent shall provide written evidence to the satisfaction of the Planning Secretary that shall provide written evidence to the satisfaction of the Planning Secretary that the lease agreements with the site landowners for that stage have adequate provisions to require that decommissioning occurs in accordance with this approval.	Audit Interview 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered
<b>Subdivision</b>				
1.10	The Proponent may subdivide portions of land comprising the site for the purposes of carrying out development in order to enable registration of long-term leases of part(s) of the land as shown by the lease areas contained in Appendix 2, in accordance with the Environmental Assessment and the requirements of the EP&A Act, EP&A Regulation, Conveyancing Act 1919	Audit Interview 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	(NSW), and the NSW Land Registry Services (or its successor).			
<b>2 - SPECIFIC ENVIRONMENTAL CONDITIONS</b>				
<b>Flora and Fauna Impacts</b>				
<b>Biodiversity Offset</b>				
<b>2.1</b>	Unless otherwise agreed to by the Planning Secretary, prior to the commencement of construction of the project, the Proponent shall, in consultation with the BCS and DCCEEW, secure a biodiversity offset package comprising a minimum of 750 hectares of Natural Temperate Grasslands, which provides suitable habitat for the Grasslands Earless Dragon, Striped Legless Lizard and Little Whip Snake in perpetuity through BioBanking Mechanisms to the satisfaction of the Planning Secretary. Unless otherwise agreed to by the Planning Secretary in consultation with the BCS and DCCEEW, the biodiversity offset package shall include at least 150 hectares of confirmed habitat for the Grassland Earless Dragon and the Striped Legless Lizard and at least 300 hectares of confirmed habitat for the Little Whip Snake.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered
<b>Detailed Design &amp; Micro-Siting</b>				
<b>2.2</b>	The Proponent shall ensure that all reasonable and feasible effort is made to locate wind turbines at least the following distances from adjacent hollow-bearing trees which have the potential to provide den trees for Squirrel Gliders or roost or nesting habitat for bird and bat species identified to be at risk of rotor collision during turbine operation:  a) 30 meters for Stage One; and b) 50 meters for Stage Two.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered
<b>2.3</b>	The Proponent shall ensure that all reasonable and feasible effort is made to avoid native vegetation disturbance (including clearing of hollow bearing trees)	Audit Interview 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	during micro-sitting and construction of the project so as to reduce the extent of vegetation disturbance required for the project as far as possible from the maximum of 174.3 hectares identified in the Preferred Project Report.	Site Inspection 22/7/23		
<b>2.3A</b>	<p>The Proponent must ensure that no more than 62.51 hectares (ha) of native vegetation is cleared for Stage Two (including access tracks and cabling routes), including:</p> <ul style="list-style-type: none"> <li>• 18.4 ha of Ribbon Gum-Snow Gum Open Forest (moderate to good condition);</li> <li>• 6.38 ha of Ribbon Gum-Snow Gum Open Forest (low condition);</li> <li>• 32.8 ha of Derived Grassland (moderate to good condition); and</li> <li>• 5.65 ha of Derived Grassland (low condition).</li> </ul> <p>No clearing of Snow Gum – Candlebark Woodland (moderate to good condition), Snow Gum – Candlebark Woodland (low condition) Disturbed Grassland (moderate to good condition), Disturbed Grassland (low condition) and Natural Temperate Grassland is permitted for Stage Two.</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction stage and is outside the scope of this audit Stage 2 construction has not commenced</p>	Not triggered
<b>Construction Timing</b>				
<b>2.4</b>	Consistent with Statement of Commitments 17 and 29, the Proponent shall ensure that construction works which have the potential to impact on habitat for the Grassland Earless Dragon and Striped Legless Lizard is not undertaken at the Springfield and Sherwins turbine clusters during the breeding season (November to January) for these species.	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction stage and is outside the scope of this audit Stage 2 construction has not commenced</p>	Not triggered
<b>Waterways and Aquatic Habitat</b>				
<b>2.5</b>	The Proponent shall ensure that any water extracted from the on-site farm dam for the purposes of construction activities is undertaken in a manner that maintains water volumes at levels suitable for the Blue Billed Duck, for the duration of the construction of the	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction stage and is outside the scope of this audit Stage 2 construction has not commenced</p>	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	project.			
2.6	The Proponent shall ensure that the waterway crossing of the McLaughlin River is designed and constructed in consultation with DPE Water and DPI Fisheries and consistent with DPI Fisheries guidelines <i>Policy and Guidelines for Fish Friendly Waterway Crossings (2004)</i> and <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004)</i> .	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit  Stage 2 Construction has not commenced	Not triggered
<b>Rehabilitation and Revegetation</b>				
2.7	The Proponent shall ensure that any disturbance to watercourses and/ or associated riparian vegetation is rehabilitated to a standard equal to or better than the existing condition in consultation with the DPE Water and DPI Fisheries within six months of the cessation of construction activities at the relevant area. Any revegetation measures undertaken shall be monitored and maintained consistent with the requirements of condition 2.8.	Audit Interview 22/7/23 Site Inspection 22/7/23	There were no observed water courses or riparian vegetation that was impacted by the Stage 1 works  Compliance with this condition will require further assessment during the construction of Stage 2.	Not triggered
2.8	The Proponent shall implement a revegetation and rehabilitation program for all areas of the development footprint which are disturbed during the construction of the project but are not required for the ongoing operation of the project including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Planning Secretary;  a) Restore native vegetation generally as identified in the EIS for all areas of rehabilitation for Stage Two; and b) The Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit  Stage 2 Construction has not commenced	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	the Planning Secretary) as being well established, in good health and self-sustaining.			
<b>NOISE IMPACTS</b>				
<b>Construction Hours</b>				
<b>2.9</b>	Road upgrades, construction, demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between; <ul style="list-style-type: none"> <li>a) 7am to 6pm, Monday to Friday;</li> <li>b) 8am to 1pm on Saturdays; and</li> <li>c) At no time on Sundays or NSW Public holidays, unless the Planning Secretary agrees otherwise.</li> </ul>	Complaint Register Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit  No complaints have been received regarding any work undertaken during the audit period	Not triggered
<b>2.9A</b>	The following activities may be undertaken outside the hours specified in condition 2.9 above; <ul style="list-style-type: none"> <li>a) The activities that are inaudible at non-associated receptors/ residences;</li> <li>b) The delivery of materials as requested by the NSW Police Force or other public authorities for safety reasons; or</li> <li>c) Emergency work to avoid the loss of life, property or to prevent material harm to the environment.</li> </ul>	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates primarily to the construction and/or decommissioning phase. No complaints have been received regarding any work undertaken during the audit period for any maintenance activities	Not triggered
<b>2.10</b>	Blasting associated with the construction of the project shall only be undertaken during the following hours; <ul style="list-style-type: none"> <li>a) 9:00am to 5:00pm, Mondays to Fridays, inclusive;</li> <li>b) 9:00am to 1:00pm on Saturdays and</li> <li>c) At no time on Sundays or public holidays.</li> </ul>	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit  .	Not triggered
<b>2.11</b>	The hours of construction activities specified under conditions 2.9 and 2.10 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction specified under conditions 2.9 and 2.10 shall be: <ul style="list-style-type: none"> <li>a) Considered on a case-by-case basis;</li> </ul>	- Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>b) Accompanied by details of the nature and need for activities to be conducted during the varied construction hours and any other information necessary to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of any non-associated receptor/ residence in the vicinity of the site; and</p> <p>c) A commitment that affected non-associated receptor/ residences will be informed of the timing, duration and location of the works approved under this condition as well as a contact point for inquiries and complaints at least 48 hours before that work commences.</p>			
<b>Construction Noise</b>				
2.12	The Proponent shall implement all reasonable and feasible measures to minimise noise generation from the construction of the project consistent with the requirements of the <i>Interim Construction Noise Guideline</i> (DECC, July 2009) including noise generated by heavy vehicle haulage and other construction traffic associated with the project.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit.	Not triggered
<b>Construction Blasting</b>				
2.13	The Proponent shall ensure that air blast overpressure generated by blasting associated with the project does not exceed the criteria specified in Table 1 when measured at the most-affected non-associated receptor/ residence.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit.	Not triggered
2.14	The Proponent shall ensure that the ground vibration generated by blasting associated with the project does not exceed the criteria specified in Table 2 when measured at the most affected non-associated receptor/ residence.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit.	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
2.15	Prior to each blasting event, the Proponent shall notify the relevant local council and potentially affected landowners, including details of time and location of the blasting event and providing a contact point for inquiries and complaints.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit.	Not triggered
<b>Vibration Impacts</b>				
2.16	The Proponent shall ensure that the vibration resulting from construction and operation of the project does not exceed the preferred values vibration (for low probability of adverse comment) presented in <i>Assessing Vibration: A Technical Guideline</i> (DECC, February 2006), at any non-associated receptor/ residence.	Audit Interview 22/7/23 Site Inspection 22/7/23	There are no activities associated with the operation of the Windfarm that would cause vibration impacts to any residence or receptor	Compliant
<b>Operational Noise Criteria – Wind Turbines – Stage One</b>				
2.17	<p>The Proponent shall design, operate and maintain the project to ensure that the equivalent noise level (L<sub>aeq</sub>(10minute)) from the wind turbine component of Stage One does not exceed the following limits at any existing non-associated receptor;</p> <ul style="list-style-type: none"> <li>a) 35dB (A); or</li> <li>b) The existing background noise level (L<sub>a90</sub>(10minute)) correlated to the integer wind speed at the turbine hub height at the wind farm site by more than 5dB(A), whichever is greater, for each integer wind speed (measured at hub height) from cut-in to rated power of the wind turbine generator.</li> </ul> <p>For the purpose of assessment of noise contributions specified under conditions 2.17:</p> <ul style="list-style-type: none"> <li>a) 5dB(A) shall be applied to measured noise levels where tonality is present. The presence of tonality shall be determined using the methodology detailed in Wind Turbine Generator Systems – Part 11: Acoustic Noise Measurement Techniques IEC 61400-11:2002 or its latest edition; and</li> <li>b) Noise from the project shall be measured at the most affected point within the residential</li> </ul>	<p>Environmental Noise Compliance report, Sonus September 2015.</p> <p>Complaints Register</p> <p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Sonus were commissioned by Squadron Energy to undertake operational noise measurements in 2015. The results of the testing confirmed compliance with the conditions of consent, and with the Environment Protection Licence.</p> <p>There have been no recorded noise complaints</p>	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	boundary, or at the most affected point within 20 metres of the dwelling, where the dwelling is more than 20 metres from the boundary.			
2.18	Notwithstanding conditions 2.17 of this approval, the noise limits specified under conditions 2.17 does not apply to any receptor where a noise agreement is in place between the Proponent and the respective landowner(s) in relation to noise impacts and/ or noise limits. Where a noise agreement has been entered into, the noise agreements shall satisfy the requirements of <i>Guidelines for Community Noise</i> (WHO, 1999) and Section 2.3 of <i>Wind Farms; Environmental Noise Guidelines</i> (South Australian Environmental Protection Agency, 2003).	Environmental Noise Compliance report, Sonus September 2015. Complaints Register Audit Interview 22/7/23 Site Inspection 22/7/23	Sonus were commissioned by Squadron Energy to undertake operational noise measurements in 2015. The results of the testing confirmed compliance with the conditions of consent, and with the Environment Protection Licence.  There have been no recorded noise complaints	Compliant
<b>Operational Noise Criteria – Wind Turbines – Stage Two</b>				
2.18A	The Proponent must ensure that the noise generated by the operation of Stage Two wind turbines does not exceed the higher of 35dB(A) or the existing background noise level (LA90(10minute)) plus 5dB(A) for each integer wind speed, measured at hub height, from cut-in to rated turbine generator power, at any non-associated residence.  Noise generated by the operation of the Stage Two wind turbines to be measured in accordance with the relevant requirements of the Department's <i>Wind Energy: Noise Assessment Bulletin</i> (2016) (or its latest version). The noise generated by the operation of the wind turbines must also be adjusted for tonality and low frequency noise in accordance with the Department's <i>Wind Energy; Noise Assessment Bulletin</i> (2016) (or its latest version).  However, these criteria do not apply if the Proponent has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.	Audit Interview 22/7/23 Site Inspection 22/7/23	This condition relates to the operation of Stage two which has not commenced construction.	Not triggered
2.19	Deleted	-	-	-

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Operation Noise Criteria – Other Facilities – Stage One</b>				
2.20	<p>The Proponent shall design, construct, operate and maintain the collector substation to ensure that the noise contributions from these components to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 3, at the nearest existing non-associated receptor to the substation. The maximum allowable noise contributions apply under wind speeds up to 3ms-1 (measured at 10 meters above ground level), or under temperature inversion conditions of up to 3 degrees celsius/ 100 metres and wind speeds of up to 2m/s at 10 metres above the ground.</p> <p>For the purpose of assessment of noise contributions specified under this condition, noise from these components shall be;</p> <ul style="list-style-type: none"> <li>a) Measured at the most affected point within the residential boundary or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine the compliance with the Laeq(15minute) noise limits;</li> <li>b) Measured at 1 metre from the dwelling façade to determine compliance with the LA1(1minute) noise limits; and</li> <li>c) Subject to the modification factors provided in Section 4 of the <i>New South Wales Industrial Noise Policy</i> (EPA, 2000), where applicable.</li> </ul> <p>Notwithstanding, should direct measurement of noise from these components be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the <i>New South Wales Industrial Noise Policy</i> (EPA, 2000)). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Planning Secretary prior to the implementation of the assessment method.</p> <p>Unless otherwise agreed by the Planning Secretary, the modification factors presented in Section 4 of the <i>New South Wales Industrial Noise Policy</i> (EPA, 2000), in</p>	<p>Environmental Noise Compliance report, Sonus September 2015.</p> <p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Sonus were commissioned by Squadron Energy to undertake operational noise measurements in 2015. The results of the testing confirmed compliance with the conditions of consent, and with the Environment Protection Licence.</p> <p>There have been no recorded noise complaints</p>	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	relation to low frequency noise, only apply if the difference between the A weighted and the C weighted noise is greater than or equal to 15dB and the measured sound pressure level is greater than Leq 65dB(c).			
2.21	The requirements of condition 2.20 does not apply if a negotiated agreement consistent with the requirements of Section 8.3 of the <i>New South Wales Industrial Noise Policy</i> (EPA, 2000), exists between the Proponent and the relevant non-associated receptor.	Audit Interview 22/7/23 Site Inspection 22/7/23	Noted	Compliant
<b>Operational Noise Criteria – Ancillary Infrastructure – Stage Two</b>				
2.21A	The noise generated by the operation of ancillary infrastructure for Stage Two must not exceed 35dB(A) LAeq(15minute) at any non-associated residence.  Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the <i>NSW Noise Policy for Industry</i> (2017) (or its equivalent)	Audit Interview 22/7/23 Site Inspection 22/7/23	This condition relates to the operation of Stage two which has not commenced construction.	Not triggered
<b>Operational Noise Design Standards – Overhead Transmission Line</b>				
2.22	The Proponent shall ensure that any overhead transmission line associated with the project is designed, constructed and operated to minimise the generation of corona and aeolian noise as far as reasonable and feasible at nearest existing non-associated receptors/ residences.	Audit Interview 22/7/23 Site Inspection 22/7/23 Complaints register	No corona or aeolian noise complaints received.  SE noted that there is a short section of overhead 33kV transmission line that connects the north eastern cluster of WTG's to the Bocco Rock Windfarm substation. The transmission line is located approximately 2km from the nearest inhabited residence (Boco) and therefore no corona or aeolian noise impacts are expected.	Compliant
<b>Visual Amenity</b>				
<b>Turbines</b>				
2.23	For a period of 5 years from the commencement of construction of Stage Two, the owner of receiver SPR002 (if a dwelling is built, identified in Appendix 1)	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction of stage 2 and is outside the scope of this audit	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>and any non-associated residence within 5km of any Stage Two wind turbine identified in the Final Layout Plan may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of Stage Two on their residence (including its curtilage).</p> <p>Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner.</p> <p>These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the Stage Two wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of Stage Two wind turbines from any other locations on the property other than the residence and its curtilage.</i></li> <li><i>The identification of appropriate visual impact mitigation measures will be more effective following the construction of the Stage Two wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction of Stage Two, it is recommended owners consider whether there is benefit in delaying such a request until the relevant wind turbines are visible from their residence or its curtilage.</i></li> </ul>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
2.24	Wind turbine generators shall be painted matt off-white/ grey. The blades shall be finished with a surface treatment that minimizes any potential for glare or reflection. No advertising, signs or logos shall be mounted on the turbines, except where required for safety purposes. A corporate logo may be placed on the turbines provided it is not distinguishable by the naked eye from any publicly accessible location or from any non-associated receptor/ residence.	Site Inspection 22/7/23	The exterior of all WTGs were finished in a matt-white, with no visible branding or advertising.	Compliant
2.25	The Proponent shall ensure that shadow flicker arising from the operation of the project shall not exceed 30 hours/ annum at any non-associated receptor/ residence.	Shadow flicker modelling assessment by CWP Renewables, April 2022.	Modelling of worst-case scenario identified one receptor as subject to in excess of 30 hours shadow flicker/annum. However, the one receptor is an associated residence so the condition is fully complied with.	Compliant
<b>Substation</b>				
2.26	The Proponent shall ensure that the substation and associated facility site is designed and constructed to minimise visual intrusion to nearest non-associated receptor/ residence as far as reasonable and feasible including appropriate external finishes to minimise glare or reflection, landscape planting to screen views and external lighting requirements in accordance with condition 2.27.	Audit Interview 22/7/23 Site Inspection 22/7/23	The substation and associated maintenance facilities are constructed in an area with the nearest residence a substantial distance from its location. Workshop and substation buildings are painted a beige colour to blend in with the surrounding landscape and the surrounding hills provide a natural visual barrier in some directions.	Compliant
<b>Night Lighting</b>				
2.27	With the exception of aviation hazard lighting implemented in accordance with the requirements of this condition, no external lighting other than low intensity security night lighting is permitted on site unless otherwise agreed or directed by the Planning Secretary. Prior to the commencement of construction of each stage of the project, the Proponent shall consult with the Civil Aviation Safety Authority on the need for aviation hazard lighting in relation to the wind turbines for the relevant stage of the project and implement such lighting only where it is specifically required by the Civil Aviation Safety Authority. In this case, aviation hazard	Audit Interview 22/7/23 Site Inspection 22/7/23 CASA dated 8/12/2010 t DPE Letter dated 16/4/13	There are no aviation hazard lights installed on the turbine masts as they are outside the obstacle limitation surface.  DPE have approved the use of outdoor lighting at the substation maintenance facility and the use of temporary lighting for unplanned maintenance work.  No complaints have been received regarding lighting.	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	light shall be implemented in a manner that minimises visual intrusion to surrounding non-associated receptors/ residences as far as reasonable and feasible.			
<b>Traffic and Transport Impacts</b>				
2.28	<p>Prior to the commencement of construction of each stage of the project, the Proponent shall commission a suitably qualified expert to assess the condition of all public roads proposed to be traversed by construction traffic associated with the relevant stage of the project (including over-mass or over-dimensional vehicles) in consultation with Council and TfNSW and identify any upgrade requirements to accommodate project traffic for the duration of construction of that stage (including culvert, bridge and drainage design; intersection treatments; vehicles turning requirements; and site access) considering final traffic volumes. The road dilapidation report shall be submitted to the Planning Secretary prior to the commencement of construction of each stage of the project clearly identifying recommendations made by the Council and TfNSW and how these have been addressed.</p> <p>Unless otherwise agreed by the Planning Secretary, the Proponent shall ensure that all upgrade measures identified in the report are implemented to the satisfaction of the Council and TfNSW, prior to the commencement of construction of each stage of the project.</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	Condition relates to the construction stage and is outside the scope of this audit	Compliant
2.29	<p>Prior to the commencement of operation of each stage of the project, the Proponent shall commission a suitably qualified expert to assess the condition of all public roads traversed by construction traffic associated with the project (including over mass or over dimensional vehicles) in consultation with Council and TfNSW. Should the pre-operational dilapidation survey report identify any damage to roads attributable to construction traffic associated with the project, the Proponent shall repair the roads consistent with the recommendations of the pre-operational dilapidation survey report, within such time as agreed to with the</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	Condition relates to the operation of Stage 2 and is outside the scope of this audit	Compliant

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	Council and TfNSW. The pre-operation road dilapidation report shall be submitted to the Planning Secretary prior to the commencement of operation of each stage of the project, clearly identifying recommendations made by the Council and TfNSW and how these have been addressed.			
<b>Crown Land</b>				
2.30	Prior to the commencement of construction of each stage of the project, the Proponent shall reach agreement with the Council to assume full maintenance responsibility for any Crown road reserves associated with the relevant stage of the project which are identified as requiring dedication to Council during the life of the relevant stage of the project. The Proponent shall retain full maintenance responsibility for any such road(s) for the duration of their dedication to Council during the life of the relevant stage of the project.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction stage and is outside the scope of this audit	Not triggered
2.31	Prior to the commencement of construction of each stage of the project, the Proponent shall consult with and comply with the requirements of DPE Crown Lands in relation to any Crown land affected by the project to enable the lawful use of that land by the project.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction of Stage 2 and is outside the scope of this audit	Compliant
<b>Hazard and Risk</b>				
<b>Bushfire Risk</b>				
2.32	The Proponent must: <ul style="list-style-type: none"> <li>e) Minimise the fire risks of the project, including managing vegetation fuel loads on site</li> <li>f) Ensure that the project <ul style="list-style-type: none"> <li>• Complies with the relevant asset protection requirements for the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones:</li> </ul> </li> </ul>	Letter to DPE dated 21/3/23 Audit Interview 22/7/23 Site Inspection 22/7/23	SE advised that RFS visit the site every 2 years to monitor the asset protection zone.  SE advised they are planning on installing the 20,000L water supply tank as part of Stage 2 works.  <b>Recommendation</b>  Conduct a pre-bushfire season readiness review to ensure all the obligations made relating to fire prevention and emergency management are	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>• Is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road;</li> <li>g) Develop procedures to manage potential fires on site, in consultation with the RFS;</li> <li>h) Assist the RFS and emergency services as much as practicable if there is a fire or fire risk in the vicinity of the site; and</li> <li>i) Notify the relevant local emergency management committee following construction of the project and prior to commencing operations of Stage Two.</li> </ul>		implemented and are fully functioning.	
2.33	Deleted	-	-	-
<b>Aviation Obstacles and Hazards</b>				
2.34	<p>Prior to the commencement of construction and operation of each stage of the project, the Proponent shall provide the following information to the Civil Aviation Safety Authority, AirServices Australia, the Aerial Application Association as well as known privately owned local airfields in the local area:</p> <ul style="list-style-type: none"> <li>a) As constructed coordinates in latitude and longitude of each wind turbine generator;</li> <li>b) Final height of each wind turbine generator in Australian Height Datum; and</li> <li>c) Elevation at the base of each wind turbine generator in Australian Height Datum.</li> </ul>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	Condition relates to the construction and pre-operation phases and is outside the scope of this audit. SE noted that appropriate notifications were sent to the relevant authorities in accordance with this condition.	Not triggered
2.35	Should increases to the costs of aerial agricultural spraying on any non-associated property surrounding the site be attributable to the operation of the project, the Proponent shall fully fund to the affected landowner, the cost difference between current aerial agricultural spraying and the increased cost.	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	There has been no increase to the cost of aerial agricultural spraying on any non-associated property surrounding the site during the audit period.	Not triggered
<b>Bunding and Spill Management</b>				

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
2.36	<p>The Proponent shall store and handle all dangerous goods (as defined by the Australian Dangerous Goods Code) and combustible liquids, strictly in accordance with;</p> <ul style="list-style-type: none"> <li>a) All relevant Australian Standards;</li> <li>b) A minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</li> <li>c) The EPA's <i>Storing and Handling of Liquids; Environmental Protection – Participants Handbook if the chemicals are liquids.</i></li> </ul> <p>In the event of an inconsistency between requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Site Inspection 22/7/23	Bunded and ventilated storage containers were provided on site to provide secure storage for fuels and chemicals. Only minor volumes of fuels and chemicals are stored with several small chemical cabinets provided in a covered area within the workshop.	Compliant
<b>Electromagnetic Interference</b>				
<b>Television and Radio Interference</b>				
2.37	Prior to the commencement of commissioning of each stage of the project, the Proponent shall undertake an assessment of the existing quality of the television/ radio transmission available at the representative sample of non-associated receptors/ residences located within 5 kilometres of any wind turbine.	Audit Interview 22/7/23 Pre-Construction TV and Radio Reception report dated 15/9/2014	A preconstruction survey was undertaken within a 5km radius of the wind turbines. There have been no complaints received relating to television or radio reception	Compliant
2.38	<p>In the event of a complaint regarding television/ radio transmission during the operation of the project from a non-associated receptor/ residence located within 5 kilometres of a wind turbine, the Proponent shall investigate the quality of transmission at the receptor/ residence compared to the pre-commissioning situation and where any transmission problems can be reasonably attributable to the project, rectify the problems within three months of the receipt of the complaint, through the implementation of such measures as;</p> <ul style="list-style-type: none"> <li>a) Modification to or replacement of receiving antenna;</li> <li>b) Installation and maintenance of a parasitic</li> </ul>	Audit Interview 22/7/23 Complaints Register	No complaints have been received regarding television or radio reception.	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>antenna system;</p> <p>c) Provision of a land line between the affected receptor/ residence and an antenna located in an area of favourable reception; or</p> <p>d) Other feasible measures.</p> <p>If interference cannot be overcome by the measures outlined in a) to d), the Proponent shall negotiate with the impacted landowner about installing and maintaining a satellite receiving antenna. The Proponent shall be responsible for all costs associated with the mitigation measures.</p>			
<b>Radio Communication</b>				
2.39	<p>The Proponent shall design and construct each stage of the project in consultation with registered communications licensees (including emergency services) to ensure that risks to these services are minimized as far as reasonable and feasible. In the event that any disruptions to radio communication service links (installed before construction of that stage of the project) arise as a result of the project, the Proponent shall undertake appropriate remedial measures in consultation with the relevant licensee to rectify any issue within three months of the problem being identified. Such measures may include;</p> <p>a) Modification to or relocation of the existing antennae;</p> <p>b) Installation of a directional antennae; and/ or</p> <p>c) Installation of an amplifier to boost the signal strength.</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>A preconstruction survey was undertaken within a 5km radius of the wind turbines. There have been no complaints received relating to television or radio reception.</p> <p>Condition relates to the construction of Stage 2 and is outside the scope of this audit</p>	Compliant
<b>Heritage Impacts – Stage One</b>				
2.40	<p>The Proponent shall ensure that registered Aboriginal stakeholders are provided the opportunity to have input into a micro-sitting of Stage One project components in relation to potential impacts on indigenous heritage and cultural values.</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Condition relates to the construction of Stage 1 and is outside the scope of this audit</p>	Not triggered
2.41	<p>If during the course of construction of Stage One the Proponent becomes aware of any previously</p>	<p>Audit Interview 22/7/23</p>	<p>Condition relates to the construction of Stage 1</p>	Not triggered

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	unidentified Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and Heritage NSW informed in accordance with <i>National Parks and Wildlife Act 1974</i> . In addition, registered Aboriginal Stakeholders shall be informed of the finds. Works shall not recommence until an appropriate strategy for managing the objects has been determined in consultation with Heritage NSW and the registered Aboriginal stakeholders and written authorisation from Heritage NSW is received by the Proponent.	Site Inspection 22/7/23	and is outside the scope of this audit	
2.42	If during the course of construction the Proponent becomes aware of any unexpected historical relic(s), all work likely to affect the relic(s) shall cease immediately and the Heritage Council notified in accordance with the <i>Heritage Act 1977</i> . Works shall not recommence until the Proponent receives written authorisation from the Heritage Council.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction phase and is outside the scope of this audit	Not triggered
<b>Heritage Chance Finds Protocol – Stage Two</b>				
2.42A	Prior to the commencement of construction of Stage Two, the Proponent must prepare a Chance Finds Protocol for Stage Two in consultation with Aboriginal Stakeholders, and to the satisfaction of Heritage NSW. Following approval, the Proponent must implement the Chance Finds Protocol.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction of Stage 2 and is outside the scope of this audit	Not triggered
<b>Dust Generation</b>				
2.43	The Proponent shall construct and operate the project in a manner that minimises dust generation from the sit, including wind blown and traffic-generated dust as far as practicable. All project related activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should visible dust emissions attributable to the project occur during operation and construction, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	Audit Interview 22/7/23 Site Inspection 22/7/23 Complaints register	At the time of the site inspection, rehabilitation work was complete with good ground cover and no earthworks or stockpiling of materials observed. Internal access roads were graded and in good condition.  There were no visible dust plumes observed on site.	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Water Quality Impacts</b>				
2.44	Except as may be expressly provided by an Environmental Protection Licence for the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> which prohibits the pollution of waters.	Audit Interview 22/7/23 Site Inspection 22/7/23	All chemicals and fuels were stored appropriately banded areas.  Rehabilitation work provides effective groundcover to prevent erosion. Addition drainage controls and rock checks are provided to prevent scouring and water pollution.  There have been no incidents reported that would result in water pollution	Compliant
2.45	Soil and water management controls shall be employed to minimise soil erosion and the discharge of sediment and other pollutants to lands and/ or waters during construction activities for Stage One, in accordance with Landcom's <i>Managing Urban Stormwater; Soils and Conservation</i> .	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction phase and is outside the scope of this audit  Refer above relating to the controls implemented for the operational phase.	Not triggered
2.45A	For Stage Two, the Proponent must;  a) Minimise erosion and control sediment generation; and b) Ensure the wind turbine pads, ancillary infrastructure, access roads and any other land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with <i>Managing Urban Stormwater</i> - <i>Soils and Construction Volume 1</i> (Landcom, 2004) and <i>Managing Urban Stormwater</i> - <i>Soils and Construction Volume 2C Unsealed Roads</i> (DECC, 2008), or their latest versions.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the construction of Stage 2 and is outside the scope of this audit	Not triggered
<b>Water Supply</b>				
2.45B	The Proponent must ensure that it has sufficient water for all stages of the project, and if necessary adjust the scale of the project to match its available water supply.	Audit Interview 22/7/23 Site Inspection 22/7/23	Only minor volumes of water is used for stage 1. Water is collected from building roofs and retained for reuse where feasible. Potable water for domestic purposes is imported to site.	Compliant

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	<p><i>Note:</i></p> <p><i>Under the Water Act 1912 and/ or Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the project.</i></p>		There is no extraction of groundwater undertaken.	
<b>Waste Generation and Management</b>				
2.46	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> , if such a licence is required in relation to that waste.	Audit Interview 22/7/23 Site Inspection 22/7/23	There was no waste observed to be received at the site. There is minimal waste generated at the site and appropriate waste storage facilities are provided in the workshop area	Compliant
2.47	The Proponent shall maximise the reuse and/ or recycling of waste materials generated on site, to minimise the need for treatment or disposal of those materials outside the site.	Audit Interview 22/7/23 Site Inspection 22/7/23	Appropriate recycling facilities were observed on site.	Compliant
2.48	The Proponent shall ensure that all liquid and/ or non-liquid waste generated on the site is assessed and classified in accordance with the Waste Classification Guidelines (EPA, 2014), or any future guideline that may supersede that document and where removed from the site is only directed to a waste management facility lawfully permitted to accept the materials.	Audit Interview 22/7/23 Site Inspection 22/7/23 Waste Management Records – April 2023 Cleanaway tax invoice for waste removed dated 24/1/23	Waste generated includes general waste, grease, oily rags, oil filters and grease cartridges.  Cleanaway have been contracted to remove waste from site. Appropriate waste records were provided by SE.	Compliant
2.49	The Proponent shall ensure that no green waste is burnt on site during the life of the project.	Audit Interview 22/7/23 Site Inspection 22/7/23	At the time of the audit all clearing activities were complete with no green waste generated during the operational phase.	Compliant
<b>Temporary construction</b>				

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2.50	<p>The Proponent shall locate temporary construction facilities associated with the project (including batch plant/ rock crusher sites) at the locations identified in the Environmental Assessment unless otherwise agreed to by the Planning Secretary. In seeing approval from the Planning Secretary on alternative sites, the Proponent shall demonstrate that the site;</p> <ul style="list-style-type: none"> <li>a) Would be located within the project site; identified in the Environmental Assessment;</li> <li>b) Would not require vegetation clearing beyond that already assessed for the project;</li> <li>c) Would achieve construction noise goals consistent with <i>Interim Construction Noise Guideline</i> (DECC, July 2009) and construction vibration goals consistent with <i>Assessing Vibration; A Technical Guideline</i> at the nearest non-associated receptors/ residences;</li> <li>d) Would be located away from any identified areas of Aboriginal cultural heritage sensitivity;</li> <li>e) Would be located away from waterways or other significant water bodies;</li> <li>f) Would have ready access to the road network and not require significant heavy vehicle movement near non-associated receptors/ residences; and</li> <li>g) Would be separated from nearest non-associated receptors/ residences by at least 500 metres.</li> </ul>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction phase and is outside the scope of this audit</p>	<p>Not triggered</p>
<b>Community Contributors</b>				
2.51	<p>Prior to the commencement of construction of the project, the Proponent shall establish a Community Enhancement Program Fund to be administered by Council to fund community enhancement measures in the Snowy Monaro Regional local government area to offset any potential residual amenity impacts associated with the project within the local government area. Community enhancement measures may include (but are not necessarily limited to) improvements to community infrastructure and services, sustainability initiatives and opportunities for local economic and</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction phase and is outside the scope of this audit</p>	<p>Not triggered</p>

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	<p>tourist development.</p> <p>The proponent must:</p> <ul style="list-style-type: none"> <li>• \$2,500 per operational turbine within Stage One (as shown in Appendix 1), from the commencement of operation of the project, until the end of Stage One's operational life; and</li> <li>• \$80,000 from the commencement of operation of any turbine within Stage Two, until the end of Stage Two's operational life.</li> </ul> <p>The contribution shall be adjusted to take account of any increase in the Consumer Price Index over time, commencing at the June 2010 quarter. The terms for the administration of the funds shall be agreed between the Proponent and Council and submitted for the Planning Secretary's approval prior to the commencement of construction:</p>			
<b>3 – Environmental Monitoring, Reporting and Auditing</b>				
3.1	Deleted	NA	NA	NA
3.2	Deleted	NA	NA	NA
<b>Bird and Bat Monitoring – Stage One</b>				
3.3	<p>Prior to the commencement of construction of Stage One, the Proponent shall prepare and submit for the approval of the Planning Secretary a <b>Bird and Bat Adaptive Management Program</b> for Stage One, which takes account of bird/ bat monitoring methods identified in the current editions of AusWEA <i>Best Practice Guidelines For the Implementation of Wind Energy Project in Australia</i> and <i>Wind Farm and Birds: Interim Standards for Risk assessment</i>. The program shall be prepared and implemented by a suitably qualified expert, approved by the Planning Secretary. The Program shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring. It shall:</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Condition relates to the construction phase and is outside the scope of this audit</p>	Compliant

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	<p>a) Incorporate an ongoing role for the suitably qualified expert;</p> <p>b) Set out monitoring requirements in order to assess the impact of the project on bird and bat populations, including details on survey locations, parameters to be measured, frequency of surveys and analysis and reporting. The monitoring program shall be capable of detecting any changes to the population of birds and/ or bats that can reasonably be attributed to the operation of Stage One, that is, data may be required to be collected prior to the commencement of construction of Stage One;</p> <p>c) Incorporate a decision making framework that sets out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;</p> <p>d) Identify 'at risk' bird and bat groups, seasons (such as wet seasons where bird species may be attracted to nearby wetlands) and/ or areas within the project site which may attract high levels of mortality and include monthly mortality assessments and periodic local population census' and bird utilisation survey;</p> <p>e) Identify potential mitigation measures and implementation strategies in order to reduce impacts on birds and bats from Stage One such as minimising the availability of raptor perches, swift carcass removal, pest control including rabbits, use of deterrents and, sector management including switching off turbines that are predicted to or have had an unacceptable impact on bird/ bat mortality at certain times; and</p> <p>f) Identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the applicant of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.</p> <p>The reports referred to under part f) shall be submitted to the Planning Secretary on an annual basis for the first five years of operation and every two years thereafter</p>			

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	<p>from the commencement of operation (unless otherwise agreed to by the Planning Secretary), and shall be prepared within two months of the end of the reporting period. The Planning Secretary may at the request of the Proponent, vary the reporting requirement or period by notice in writing to the Proponent. The Proponent may request the Planning Secretary to consider a variation to the reporting requirements at any time.</p> <p>The Proponent is required to implement reasonable feasible mitigation measures for Stage One as identified under part e) where the need for further action is identified through the Bird and Bat Adaptive Management Program for Stage One, or as otherwise agreed with the Planning Secretary.</p>			
<b>Bird and Bat Monitoring – Stage Two</b>				
3.4	<p>Prior to the commissioning of any wind turbines, for Stage Two, the Proponent must prepare and submit for the approval of the Planning Secretary a Bird and Bat Adaptive Management Program for Stage Two in consultation with the BCS, and to the satisfaction of the Planning Secretary. The Program must include:</p> <ol style="list-style-type: none"> <li>a) At least 12 months worth of baseline data on threatened and ‘at risk’ bird and bat species and populations in the locality that could be affected by Stage Two;</li> <li>b) A detailed description of the measures that would be implemented on site for minimising bird and bat strike during operation of Stage Two, including; <ul style="list-style-type: none"> <li>• Minimising the availability of raptor perches on wind turbines</li> <li>• Prompt carcass removal</li> <li>• Controlling pests (such as rodents and rabbits); and</li> <li>• Using best practice methods for bat deterrence, including managing potential lighting impacts;</li> </ul> </li> <li>c) Species specific trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or</li> </ol>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Condition relates to the commissioning phase of Stage 2 and is outside the scope of this audit</p>	Not triggered-

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>populations and for the implementation of adaptive management measures (including but not limited to, White-Throated Needletail, Grey-headed Flying Fox, Large Bent-winged Bat, Little Eagle, White-bellied Sea Eagle and Spotted Harrier);</p> <p>d) An adaptative management program that would be implemented if the project is having an adverse impact on a particular threatened or 'at risk' bird and/ or bat species or population (including species listed in condition 3.4 c) above), including the implementation of measures to;</p> <ul style="list-style-type: none"> <li>• Reduce the mortality of those species populations;</li> <li>• Where avoidance and minimisation actions are either not available or have proven to be ineffective, implement conservation actions in an area that is not subject to the risk of turbine strike;</li> <li>• Notify BCS of all strikes of threatened species within 30 business days of detection.</li> </ul> <p>e) A detailed program to monitor and report on;</p> <ul style="list-style-type: none"> <li>• The effectiveness of any measures implemented to avoid or minimise the risk of strikes;</li> <li>• Any bird and bat strikes on site, including details on survey locations, parameters measured, frequency of surveys and analyses (including provision for increased frequency of surveys for threatened or 'at risk' bird and/ or bat species or population, including White Throated Needletail, Grey Headed Flying Fox, Large Bent-Winged Bat, Little Eagle, White Bellied Sea Eagle and Spotted Harrier);</li> <li>• For White Throated Needle Tail, undertake pulse monitoring when there is a significant storm event between October and April; and</li> </ul>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>f) Provisions for a copy of all raw data collected as part of the monitoring program to be submitted to the BCS and the Planning Secretary.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Bird and Bat Adaptive Management Program.</p>			
3.5	From the commencement of operation of Stage Two, results of the monitoring program outlined in condition 3.4e) must be published on the Proponents website on an annual basis for the first five years of operation of Stage Two and every two years thereafter (unless otherwise agreed to by the Planning Secretary), and must be prepared within two months of the end of the reporting period.	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	Condition relates to the operation of Stage 2 and is outside the scope of this audit	Not triggered
3.6	The Proponent must prepare and implement a Research Program, and allocate \$50,000 to this program, and submit to the Planning Secretary for approval prior to the commencement of operation of Stage Two. The Program must be targeted at further study in the White Throated Needletail, including how and when the species moves across eastern Australia flight paths and potential mitigation for future wind farm design.	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	Condition relates to the operation of Stage 2 and is outside the scope of this audit.	Not triggered
<b>4 – Environmental Management, Reporting and Auditing</b>				
<b>Compliance Tracking – Stage One</b>				
4.1	<p>Unless otherwise agreed by the Planning Secretary, prior to the commencement of construction of Stage One, the Proponent shall develop and implement a <b>Compliance Tracking Program</b> for Stage One, to track compliance with the requirements of this approval during the construction and operation of Stage one and shall include, but not necessarily limited to:</p> <p>a) Provisions for periodic review of the compliance status of Stage One against the requirements of this approval, Statement of</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p> <p>Compliance Tracking Program</p>	<p>Condition relates to the construction of Stage 1 and is therefore outside the scope of this audit</p> <p>Regardless, SE have prepared and have implemented a comprehensive compliance tracking spreadsheet for the operation of Stage 1. Compliance reporting is provided on the project website.</p>	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>Commitments and relevant environmental approvals, licences or permits required and obtained in relation to the project;</p> <p>b) Provisions for periodic reporting of compliance status against the requirements of this approval and Statement of Commitments to the Planning Secretary including at least one month prior to the commencement of construction and operation of Stage One;</p> <p>c) A program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/ or Environmental Management Systems Auditing;</p> <p>d) Procedures for rectifying any non-compliance identified during periodic reviews of compliance or environmental auditing;</p> <p>e) Mechanisms for recording environmental incidents and actions taken in response to those incidents; and</p> <p>f) Provisions for reporting environmental incidents to the Planning Secretary during construction and operation.</p>			
<b>Independent Environmental Audit</b>				
4.2	Independent Audits of Stage One and Stage Two must be conducted and carried out at the frequency described in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> , unless otherwise agreed or directed by the Planning Secretary.	DPE - Independent Audit Post Approval Requirements (2020)	This audit is being undertaken in accordance with the requirements of the Independent Audit Post Approval Requirements (2020). The audit team has been approved by DPE	Compliant
<b>Revising, Staging, Combining and Updating Strategies, Plans or Programs</b>				
4.3	<p>The Proponent must:</p> <p>a) Update the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>b) Review and, if necessary, revise the</p>	<p>DPE Letter dated 7/6/23</p> <p>Audit Interview 22/7/23</p>	<p>A letter was received from DPE 7 June 2023 confirming no further action required based on:</p> <ul style="list-style-type: none"> <li>The non-compliance was self-reported to the Department.</li> <li>The revised OEMP was submitted to the Department on 25 April 2023 for review and approval.</li> </ul>	Non-Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the;</p> <p>c) Submission of an incident report under 4.12;</p> <p>d) Submission of an audit report under condition 4.2; or</p> <p>e) Any modification to the conditions of this approval.</p>		<ul style="list-style-type: none"> <li>The revised BBAMP was submitted to the Department on 25 May 2023 for review and approval.</li> <li>There was no known harm to the environment or public health/safety due to the non-compliance</li> </ul> <p><b>Recommendation</b></p> <p>Ensure all future submissions of documents comply with DPE requirements for reporting timeframes</p>	
4.4	<p>With the approval of the Planning Secretary, the Proponent may;</p> <p>a) Prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the project to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>b) Combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>c) Update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the project).</p>	Audit Interview 22/7/23	Noted	Compliant
4.5	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.	Audit Interview 22/7/23	Noted	Compliant
4.6	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in	Audit Interview 22/7/23	Noted	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	accordance with the condition that requires the strategy, plan or program.			
4.7	If the Planning Secretary agrees, a strategy plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.	Audit Interview 22/7/23	Noted	Compliant
4.8	A strategy, plan or program that was prepared for a stage of the project and approved in accordance with this approval, prior to the date of commencement of Modification 1, will not be combined with, updated or superseded by any strategy, plan or program prepared and approved after the commencement of Modification 1 unless the combining, updating or superseding is expressly provided for by the Proponent in the subsequent strategy, plan or program.	Audit Interview 22/7/23	Noted	Compliant
<b>Notifications</b>				
<b>Notification of Department</b>				
4.9	<p>Prior to commencing the;</p> <ul style="list-style-type: none"> <li>a) Upgrading or decommissioning of Stage One or the cessation of operations of Stage One; and</li> <li>b) Construction, operations, upgrading or decommissioning of Stage Two or the cessation of operations of Stage Two.</li> </ul> <p>The Proponent must notify the department in writing via the Major Projects website Portal of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the project are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage and clearly identify the development that would be carried out during the relevant stage.</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Stage one has not been upgraded or commissioned. Stage 2 has not commenced construction. Therefore, this condition has not been triggered.</p>	Not Triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Final Layout Plans – Stage Two</b>				
4.10	<p>Prior to the commencement of construction of Stage Two, the Proponent must submit detailed plans of the final layout for Stage Two of the Project to the Planning Secretary, including;</p> <ul style="list-style-type: none"> <li>a) Details on the micro sitting of any wind turbines and/ or ancillary infrastructure;</li> <li>b) The GPS coordinates of the final wind turbine locations;</li> <li>c) The layout of the disturbance area (including digital file) of Stage Two; and</li> <li>d) Demonstrating that Stage Two does not exceed the limits outlined in condition 2.3A</li> </ul>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the operation of Stage 2 and is outside the scope of this audit</p>	Not triggered
<b>Work as Executed Plans – Stage Two</b>				
4.11	<p>Prior to commencing operations or following the upgrades of any Stage Two wind turbines or ancillary infrastructure, the Proponent must submit work as executed plans of Stage Two and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the operation of Stage 2 and is outside the scope of this audit</p>	Not triggered
<b>Incident Notification</b>				
4.12	<p>The Department must be notified in writing via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number and the name of the project if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>There have been several minor spills that have occurred within the audit period. These included:</p> <ul style="list-style-type: none"> <li>- Approximately 40L of fuel spilt</li> <li>- Approximately 50L of transfer oil.</li> </ul> <p>The auditor notes that both spills were cleaned up with no residual contamination observed by the auditor. Neither spill had the potential to cause environmental harm</p>	Not triggered
<b>Non-Compliance Notification</b>				

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
4.13	The Department must be notified via the Major Projects website within 7 days after the Proponent becomes aware of any non-compliance with the conditions of this approval.	Audit Interview 22/7/23 DPE Planning portal lodgement form dated 24/5/23 DPE Letter dated 7/6/23 SE Letter to DPE dated 24/5/23	SE notified DPE on the 24/5/23 regarding a non-compliance with Condition 4.3	Compliant
4.14	The non-compliance notification must identify the development and the application number for it, set out in the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Audit Interview 22/7/23 DPE Planning portal lodgement form dated 24/5/23 DPE Letter dated 7/6/23 SE Letter to DPE dated 24/5/23	The non compliance letter issued to DPE on the 24/5/23 is compliant with these requirements.	Compliant
4.15	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Audit Interview 22/7/23 DPE Planning portal lodgement form dated 24/5/23 DPE Letter dated 7/6/23 SE Letter to DPE dated 24/5/23	Noted. The non compliance was administrative in nature and was not related to an incident.	Not triggered
<b>Notification Of Landowners – Stage Two</b>				
4.16	Prior to the commencement of construction of Stage Two, the Proponent must notify the owners of SPR002 (identified in Appendix 1) and the owners of the non-associated residences referred to in condition 2.23 of their rights under condition 2.23.	Audit Interview 22/7/23 Site Inspection 22/7/23	Condition relates to the operation of Stage 2 and is outside the scope of this audit	Not triggered
<b>5 – Community Information, Consultation, and Involvement</b>				
<b>Access to Information</b>				

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
5.1	<p>The Proponent must;</p> <p>a) Make the following information publicly available on its website as relevant to the stage of the project;</p> <ul style="list-style-type: none"> <li>• The Environmental Assessment;</li> <li>• The final layout plans for the project;</li> <li>• Approved strategies, plans or programs required under the conditions of this approval;</li> <li>• The proposed staging plans for the project if the construction, operation or decommissioning of the project is to be staged;</li> <li>• A comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</li> <li>• How complaints about the project can be made;</li> <li>• A complaints register, which is to be updated on a monthly basis;</li> <li>• Minutes of CCC meetings;</li> <li>• The annual Statement of Compliance with the EPL;</li> <li>• The results of the compliance tracking program;</li> <li>• Any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</li> <li>• Any other matter required by the Planning Secretary; and</li> </ul> <p>b) Keep this information up to date.</p>	<p><a href="http://bocorockwindfarm.com.au">Home   boco-rock-wind-farm (bocorockwindfarm.com.au)</a></p>	<p>The following information was provided on the project website:</p> <ul style="list-style-type: none"> <li>- Environmental Assessment (linked to DPE website)</li> <li>- Layout plans</li> <li>- Operational Environmental Management Plan and other relevant environmental strategies such as</li> <li>- Contact details to allow complaints to be made</li> <li>- CCC minutes</li> <li>- EPL Annual Return compliance documents from 2015 to 2013</li> <li>- Compliance tracking program</li> <li>- Copy of audit undertaken by the environmental representative (2015)</li> </ul>	Compliant
5.2	Deleted			
<b>Complaints Procedure</b>				
5.3	Prior to the commencement of construction of the project, the Proponent shall ensure that the following	Audit Interview 22/7/23	A community contacts page has been established which includes the following	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>are available for community complaints for the life of the project (including construction and operation);</p> <ul style="list-style-type: none"> <li>a) A 24 hour telephone number on which complaints about construction and operational activities at the site may be registered;</li> <li>b) A postal address to which written complaints may be sent; and</li> <li>c) An email address to which electronic complaints may be transmitted.</li> </ul> <p>The telephone number, the postal address and the email address shall be advertised on the Proponent's website. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public.</p>	Project website	<p>information.</p> <ul style="list-style-type: none"> <li>- 24-hour contact number</li> <li>- Email address</li> <li>- Postal address</li> </ul>	
5.4	<p>The Proponent shall record details of all complaints received through the means listed under condition 5.3 of this approval in an up to date Complaints Register. The Register shall record but not necessarily be limited to;</p> <ul style="list-style-type: none"> <li>e) Details of the complaint (such as date, time and how the complaint was made);</li> <li>f) The nature of the complaint;</li> <li>g) Any action(s) taken by the Proponent in relation to the complaint; and</li> <li>h) If no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</li> </ul> <p>The Complaints Register must be kept up to date on the Proponents website, in accordance with condition 5.1 b), above.</p>	<p>Audit Interview 22/7/23</p> <p>Complaints Register</p> <p>Microsoft Word - BRWF Community Complaint Register 20230802 (bocorockwindfarm.com.au)</p>	<p>The complaints register is updated to 4 September 2023 and includes:</p> <ul style="list-style-type: none"> <li>- Date and method of complaint</li> <li>- Nature of Complaint</li> <li>- Response and Action taken</li> <li>- Status</li> </ul> <p>The complaints register is available on the project website as required by this condition</p>	Compliant
<b>Community Information Plan</b>				
5.5	<p>Prior to the commencement of construction of each stage of the project, the Proponent shall prepare a <b>Community Information Plan</b> which outlines the approach to consultation with surrounding landowners and members of the community during construction and operation of the project. The Plan shall include but not</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p> <p>Operational Environmental Management Plan Rev E dated</p>	<p>The requirements of the community information plan have been incorporated into the operational environmental management plan</p>	Compliant

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>be limited to:</p> <ul style="list-style-type: none"> <li>a) Procedures to inform the local community o planned construction activities including construction traffic routes, potential traffic disruptions, high noise generating activities and works outside of normal construction hours;</li> <li>b) Procedures to inform and consult with landowners regarding landscaping measures at their properties in accordance with condition 2.23 of this approval;</li> <li>c) Procedures to inform and consult with landowners regarding the outcomes of noise monitoring undertaken at their properties in accordance with condition 6.4 of this approval for Stage One;</li> <li>d) Procedures to inform and consult with landowners regarding the outcomes of compliance reviews and audits of the project; and</li> <li>e) Measures outlined in conditions 5.1, 5.3, and 5.4.</li> </ul> <p>The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed with the Planning secretary. Construction works shall not commence until written approval has been received from the Planning Secretary.</p>	27/11/2014		
<b>Community Consultative Committee</b>				
5.6	<p>From commencement of construction of Stage Two, the Proponent must operate a <b>Community Information Plan</b> which outlines the approach to consultation with surrounding landowners and members of the community during construction and operation of the project. The Plan shall include but not be limited to;</p> <ul style="list-style-type: none"> <li>a) Procedures to inform the local community of planned construction activities including construction traffic routes, potential traffic disruptions, high noise generating activities</li> </ul>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	Condition relates to the construction of Stage 2 and is outside the scope of this audit.	Not triggered

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>and works outside of normal construction hours;</p> <p>b) Procedures to inform and consult with landowners regarding landscaping measures at their properties in accordance with condition 2.23 of this approval;</p> <p>c) Procedures to inform and consult with landowners regarding the outcomes of noise monitoring undertaken at their properties in accordance with condition 6.4 of this approval for Stage One;</p> <p>d) Procedures to inform and consult with landowners regarding the outcomes of compliance reviews and audits of the project; and</p> <p>e) Measures outlined in conditions 5.1, 5.3 and 5.4.</p> <p>The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Planning Secretary. Construction works shall not commence until written approval has been received from the Planning Secretary.</p>			
<b>6 – Environmental Management</b>				
6.1	Deleted	-	-	-
<b>Construction Environmental Management Plan</b>				
6.2	<p>The Proponent shall prepare and implement a <b>Construction Environmental Management Plan</b> in accordance with the <i>Guideline for the Preparation of Environmental Management Plans</i> (DUAP, 2004) or its latest revision for each stage of the project. The Plan shall include but not be necessarily be limited to;</p> <p>a) A description of all activities to be undertaken on the site during construction including an indication of stages of construction, where relevant;</p> <p>b) Identification of the potential for cumulative</p>	<p>Audit Interview 22/7/23</p> <p>Site Inspection 22/7/23</p>	<p>Condition relates to the construction of Stage 2 and is outside the scope of this audit.</p>	<p>Not triggered</p>

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>impacts with other construction activities occurring in the vicinity (such as the transmission line connection to the existing electricity grid) and how such impacts would be managed;</p> <p>c) Identification of the location of temporary construction sites including whether alternative locations (that were not identified in the Environmental Assessment) are proposed in accordance with condition 2.50;</p> <p>d) A description of the statutory obligations that the Proponent is required to fulfil prior to and during construction including all relevant approvals, licences and permits required and applicable key legislation and policies;</p> <p>e) Evidence of consultation with relevant public authorities required under this condition and how issues raised by the agencies have been addressed in the plan;</p> <p>f) A description of the roles and responsibilities for all relevant employees involved in the construction of the project including relevant training and induction provisions for ensuring that all employees, contractors and sub-contractors are aware of their environmental and compliance obligations under these conditions of approval;</p> <p>g) An environmental risk analysis to identify the key environmental performance issues associated with the construction phase and details of how environmental performance would be monitored and managed to meet acceptable outcomes including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan;</p> <p>(i) Measures to monitor and manage dust emissions including dust generated by traffic or unsealed public roads and unsealed internal access tracks;</p> <p>(ii) Measures to monitor and manage noise, vibration and blasting impacts including; identification of nearest</p>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>non-associated receptor/ residence and relevant construction noise and vibration goals applicable (including at the time of construction), identification of all reasonable and feasible measures proposed to be implemented to minimise construction noise and vibration impacts (including construction traffic noise impacts), measures for notifying surrounding receptors/ residences of noisy activities or works outside of standard hours, and measures for monitoring compliance and responding to complaints;</p> <p>(iii) Measures to monitor and manage traffic impacts in consultation with relevant road authorities (Council and TfNSW, as relevant) including; identification of construction traffic routes and traffic volumes along each route, potential traffic disruptions considering road safety and level of service, and specific measures for minimising traffic impacts;</p> <p>(iv) Measures to monitor and manage Aboriginal heritage impacts in consultation with registered stakeholders and Heritage NSW including; details of further archaeological investigations and/ or salvage measures to be carried out prior to construction, procedures for the management of identified objects within the project site, procedures for dealing with unidentified objects and/ or human remains, Aboriginal cultural heritage induction processes for construction personnel, and procedures for ongoing Aboriginal Consultation and involvement;</p> <p>(v) Measures to monitor and manage soil and water impacts in</p>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>consultation with DPE Water and DPI Fisheries including; control measures for works close to or involving waterway crossings (including rehabilitation measures following disturbance and monitoring measures and completion criteria to determine rehabilitation success), identification of construction activities that are likely to pose a risk of groundwater interference and procedures for managing groundwater impacts should they occur (including to groundwater dependent species and to registered groundwater users); and</p> <p>(vi) Emergency management measures including measures to control bushfires; and</p> <p>h) Procedures for the periodic review and update of the Construction Environmental Management Plan as necessary.</p> <p>The Plan shall be submitted for the approval of the Planning Secretary no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Planning Secretary. Construction works for the relevant stage of the project shall not commence until written approval has been received from the Planning Secretary.</p>			
6.3	<p>As part of the Construction Environmental Management Plan for the project, required under condition 6.2 of this approval, the Proponent shall prepare and implement a <b>Flora and Fauna Management Plan</b> to manage the construction impacts of the project on the flora and fauna (in particular endangered ecological communities, threatened species and their habitat) for each stage of the project. The Plan shall be prepared in consultation with the BCS and shall include, but not necessarily be limited to:</p> <p>a) Details of the final project design including demonstration of how biodiversity impacts have been avoided as far as reasonable and</p>	<p>Audit Interview 22/7/23 Site Inspection 22/7/23</p>	<p>Condition relates to the construction of Stage 2 and is outside the scope of this audit.</p>	<p>Not triggered</p>

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>feasible in accordance with conditions 2.2 and 2.3;</p> <p>b) Detailed constraint mapping of the final project area clearly identifying sensitive vegetation habitat areas to be avoided and/ or areas where site-specific management measures are required;</p> <p>c) Measures for minimising impacts to native vegetation and important habitat features including but not necessarily limited to: control measures for aquatic and/ or riparian habitat in accordance with conditions 2.5 and 2.6 (including contingency measures for meeting the water requirements for the project should sourcing water from the on site farm dam conflict with maintaining water levels for the Blue Billed Duck), pre-clearance surveys by a qualified ecologist to identify sensitive vegetation areas or habitat features to be avoided and weed management;</p> <p>d) Construction practices to avoid direct interaction/ injury to fauna including but not necessarily limited to:</p> <p>(i) Timing of construction so as to take into account sensitive life cycle stages for sensitive species (in accordance with condition 2.4);</p> <p>(ii) Pre-construction surveys for the presence of sensitive fauna by a qualified ecologist, including for the Grassland Earless Dragon and Striped Legless Lizard utilising survey methodology developed in consultation with BCS;</p> <p>(iii) As far as reasonable and feasible, maintaining appropriate barriers (such as dampcourse) so as to deter small or fossorial reptiles from entering the construction site;</p> <p>(iv) Development of a specific harm minimisation/ relocation strategy for the Grasslands Earless Dragon and Striped Legless Lizard in consultation with BCS detailing how any individuals identified within the</p>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>construction area would be relocated to adjacent habitat to prevent harm; and</p> <p>(v) Measures to minimise the potential for fauna to get trapped in trenches during construction and measures for monitoring and rescuing any species should they become trapped including ensuring that monitoring and rescue measures are undertaken by a qualified ecologist; and</p> <p>e) Measures for progressive rehabilitation during construction including identification of performance indicators and completion criteria for revegetation works and measures for the monitoring and maintenance of revegetation works consistent with the requirements of conditions 2.7 and 2.8.</p>			
<b>Operation Environmental Management Plan</b>				
6.4	<p>The Proponent shall prepare and implement an <b>Operation Environmental Management Plan</b> to detail an environmental management framework, practices and procedures to be followed during operation of the project. The Plan shall be consistent with <i>Guideline for the Preparation of Environmental Management Plans</i> (DIPNR 2004) and shall include, but not necessarily be limited to:</p> <p>a) A description of key operational and maintenance activities associated with the project;</p> <p>b) Identification of all statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all approvals, licences, approvals and consultations;</p> <p>c) A description of the roles and responsibilities for all relevant employees involved in the construction of the project including relevant training and induction provisions for ensuring that all employees, contractors and sub-contractors are aware of their environmental</p>	<p>Audit Interview 22/7/23</p> <p>Boco Rock Wind Farm Environmental Management Plan 27/11/2014</p> <p>Doc: 141127_BRWF_OEMP_WS_RevE</p> <p>DPE Letter dated 1/12/14</p> <p>DPE Post Approval form dated 26/10/22</p> <p>Letter to DPE dated 1/3/23</p> <p>Operational Environmental Management Plan, Boco Rock Windfarm dated 21/4/23</p>	<p>The Operational Management Plan was prepared and approved by DPE on 1 December 2014.</p> <p>The OEMP has recently been reviewed and updated to reflect new conditions (as modified) for the Stage 2 works . DPE were notified of the review on the 1/3/23</p> <p>At the time of the audit, DPE had not approved the revised OEMP.</p>	<b>Compliant</b>

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>and compliance obligations under these conditions of approval;</p> <p>d) Overall environmental policies and principles to be applied to the operation of the project;</p> <p>e) An environmental risk analysis to identify the key environmental performance issues associated with the construction phase and details of how environmental performance would be monitored and managed to meet acceptable outcomes including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan:</p> <p>(i) Measures to monitor and manage noise emissions including;</p> <ul style="list-style-type: none"> <li>• Measures to be undertaken to rectify annoying characteristics resulting from the operation of the project such as but not limited to adverse mechanical noise from component failure;</li> <li>• Measures for regular performance monitoring of noise generated by the project;</li> <li>• Measures to proactively respond to and deal with noise complaints;</li> </ul> <p>(i) details of noise mitigation (such as sector management or on-curtilage noise treatments) that would be used to ensure that operational noise criteria are not exceeded;</p> <p>(ii) measures to monitor and manage visual impacts in accordance with the requirements of this approval including maintenance requirements for landscaping measures implemented in relation to the project;</p> <p>(iii) measures to monitor and manage flora and fauna impacts including</p>			

Approval ID	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
	<p>adaptive bird and bat management in accordance with the requirements of this approval and measures for the monitoring and maintenance of revegetated areas on site (including associated weed management) consistent with the requirements of conditions 2.7 and 2.8;</p> <p>(iv) measures to monitor and manage dust emissions (including dust generated by traffic on unsealed internal access tracks);</p> <p>(v) Measures to monitor and manage operational traffic impacts particularly during maintenance events where operational traffic volumes associated with the project may increase and procedures for restoring any damage attributable to the project during the operation phase;</p> <p>(vi) Emergency management measures including measures to control bushfires;</p> <p>f) Procedures for the periodic review and update of the Operation Environmental Management Plan as necessary.</p> <p>The Plan shall be submitted for the approval the Planning Secretary no later than one month prior to the commencement of each stage of Operation of the project or within such period as otherwise by the Planning Secretary. Operation of each stage shall not commence until written approval has been received from the Planning Secretary.</p>			

## APPENDIX D – Document Register

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- > NSW DPE Major Project Approval MP09\_0103-MOD1 Consolidated Conditions of Consent
- > NSW EPA Environmental Protection Licence No.20434
- > NSW EPA, Environmental Protection Licence Annual Returns 2015 – 2023
- > Australian Government Environmental Protection and Biodiversity Conservation Act Approval Ref: 2009/4905
- > CWP Renewables (2014) - Boco Rock Wind Farm Operational Environmental Management Plan, Issue 27/11/2014, Doc No: 141127\_BRWF\_OEMP\_WS\_RevE
- > Squadron Energy (2023) - Operational Environmental Management Plan, Boco Rock Wind Farm, 21 April 2023, Rev F
- > CWP Renewables (2017) – Bird and Bat Adaptive Management Plan, Boco Rock Wind Farm, 25 August 2017, Final V1.3.1
- > Squadron Energy (2023) - Bird and Bat Adaptive Management Plan, Boco Rock Wind Farm, May 2023, BRWF BBMP v1.3.2 FINAL 20230525
- > Squadron Energy (2023) - BRWF Pollution Incident Response Management Plan, EPL 20434, 24 April 2023, Rev 5
- > Squadron Energy (2023) - Emergency Response Plan BRWF, 20 August 2023, Rev 5
- > BB BA 118 Active landholder annual report and audit 2023\_signed – compiled
- > BB BA 145 active landholder annual report and audit 2023\_signed – compiled
- > BSA 118 Weeroona annual report 2021-2022\_signed\_BCT Audit
- > BSA 145 Lochlea annual report 2021-2022\_signed\_BCT audit
- > 150924\_BRWF Noise Compliance Report (S4534.1C4)
- > BRWF-03-EMA-Shadow flicker assessment by DavidCWPR
- > BRWF-03-RPT-Flicker verificationCoA2.25 20220803
- > CoA 2.27\_CASA response on lighting
- > CoA 2.27\_DoPI Lighting Variation
- > BRWF DPIE Notification ERP review 20230321
- > BRWF-0-LTR-SOCBushfireassessment2022\_001
- > BRWF-EnviroI Site Inspect-Op-2023 v1
- > BRWF\_EMI PreSurvey\_draft (1)
- > RE BRWF - Community enhancement fund 2022
- > Landscape and Rehabilitation Management Plan Final v1 BOCO - E - 5104 – 07, Downer 2014
- > 2015 BRWF Bird and Bat Monitoring Annual report V1 (002)
- > 2016 BRWF Bird and Bat Monitoring Annual report V1
- > BRWF BBMP AR 2017\_V1 red
- > BRWF BBMP Annual Report\_2018
- > BRWF BBMP Annual Report 2019\_FINAL
- > BRWF BBMP 2020 Annual Report\_FINAL\_V1
- > Boco Rock Wind Farm Bird and Bat Monitoring Annual Report 2021 Final v1



- > BRWF Carcass register
- > Boco Rock Wind Farm - Post Approval Document Received - (MP09\_0103-PA-16)
- > BRWF Proposal for Revised BBAMP 20230512
- > DPE annual monitoring report comments 20220706
- > DPIE Approval of Extension Request\_30032022\_111137
- > 210211\_BRWF\_EPA Incident Notification\_Diesel spill
- > 210224\_BRWF Pollution incident details
- > BRWF - EPA Incident Notification - Oil Spill
- > REF-NO-11289 Report to NSW EPA 28032022
- > Boco Rock Wind Farm - Record the Breach
- > Boco Rock Wind Farm - Post Approval Document Received - (MP09\_0103-PA-15)
- > BRWF Non-compliance notification 20230524
- > BB BA 118 Active landholder annual report and audit 2023\_signed – compiled
- > BB BA 145 active landholder annual report and audit 2023\_signed – compiled
- > BRWF Community Complaint Register 20230802
- > Fire Testing Record - R-02133 P-0526 Service Report
- > BRWF April waste records
- > Buckley's Weed Spraying
- > BRWF\_Compliance Matrix 2023 for IEA



## APPENDIX E – Agency Consultation

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## Peterson, Richard

---

**From:** Peterson, Richard  
**Sent:** Monday, 31 July 2023 3:00 PM  
**To:** 'katrina.orielly@planning.nsw.gov.au'  
**Cc:** 'compliance@planning.nsw.gov.au'; Smith, Alistair  
**Subject:** RE: Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

Hi Katrina

Hope you're well

The audit is now planned for the 21<sup>st</sup> of August

I have also sent emails to Snowy Monaro Council and EPA.

Please advise if you have any feedback relating to the scope and focus.

**Richard Peterson**, *M Env Mgmt, BE (Civil)*

Associate

*Environment & Geoscience*

**Engineering, Design and Project Management**

Tel: +61 2 8239 8700

Mob: +61 (0) 429 227 775

SNC-Lavalin Atkins

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---

**From:** Peterson, Richard  
**Sent:** Monday, 5 June 2023 8:44 AM  
**To:** katrina.orielly@planning.nsw.gov.au  
**Cc:** compliance@planning.nsw.gov.au  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

Hi Katrina

As you are probably aware, I have been asked to undertake an independent audit of the Boco Rock Wind Farm which is in its operational phase.

[About The Project | boco-rock-wind-farm \(bocorockwindfarm.com.au\)](http://boco-rock-wind-farm (bocorockwindfarm.com.au))

Purpose of this email is to:

- Formally consult with the Department regarding any issues you would like us to consider for the audit

- Seek your advice regarding any additional organisations you would like us to consult with as part of the audit

I am planning on undertaking the audit in late June/early July so any feedback before then would be appreciated.

Many thanks in advance

**Richard Peterson**, *M Env Mgmt, BE (Civil)*

Associate  
Environmental Services

**Engineering, Design and Project Management**

**Tel:** +61 2 8239 8700

**Mob:** +61 (0) 429 227 775

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Level 17  
55 Clarence St  
Sydney | NSW | 2000 | Australia



**ATKIN**



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[atkinsglobal.com](http://atkinsglobal.com)

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## Peterson, Richard

---

**From:** Peterson, Richard  
**Sent:** Monday, 31 July 2023 2:52 PM  
**To:** 'council@snowymonaro.nsw.gov.au'  
**Cc:** Smith, Alistair  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

To whom it may concern

I have been appointed by NSW Department of Planning and Environment to undertake an independent audit of the Boco Rock Wind Farm which is in its operational phase.

[About The Project | boco-rock-wind-farm \(bocorockwindfarm.com.au\)](http://boco-rock-wind-farm (bocorockwindfarm.com.au))

The purpose of this email is to Formally consult with Council regarding any issues you would like us to consider for the audit

I am planning on undertaking the in late August so any feedback before say the 21<sup>st</sup> of August would be greatly appreciated

Many thanks in advance

**Richard Peterson**, *M Env Mgmt, BE (Civil)*

Associate  
Environmental Services

**Engineering, Design and Project Management**

**Tel:** +61 2 8239 8700

**Mob:** +61 (0) 429 227 775

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## Peterson, Richard

---

**From:** council@snowymonaro.nsw.gov.au  
**Sent:** Monday, 31 July 2023 2:53 PM  
**To:** Peterson, Richard  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

Thank you for contacting Snowy Monaro Regional Council

Your email will be processed by our Records Management Team and will be forwarded to the appropriate Council officer.

This is an auto generated response email, please do not reply to this email

Snowy Monaro Regional Council  
PO Box 714 Cooma NSW 2630  
P 1300 345 345  
[www.snowymonaro.nsw.gov.au](http://www.snowymonaro.nsw.gov.au)

---

**From:** Richard.Peterson@atkinsglobal.com  
**Sent:** 31/07/2023 2:52:23 PM +10:00  
**To:** council@snowymonaro.nsw.gov.au  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1  
To whom it may concern

I have been appointed by NSW Department of Planning and Environment to undertake an independent audit of the Boco Rock Wind Farm which is in its operational phase.

[About The Project | boco-rock-wind-farm \(bocorockwindfarm.com.au\)](http://boco-rock-wind-farm (bocorockwindfarm.com.au))

The purpose of this email is to Formally consult with Council regarding any issues you would like us to consider for the audit

I am planning on undertaking the in late August so any feedback before say the 21<sup>st</sup> of August would be greatly appreciated

Many thanks in advance

**Richard Peterson**, *M Env Mgmt, BE (Civil)*  
Associate  
Environmental Services  
**Engineering, Design and Project Management**

**Tel:** +61 2 8239 8700  
**Mob:** +61 (0) 429 227 775

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55 Clarence St  
Sydney | NSW | 2000 | Australia



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[atkinsglobal.com](http://atkinsglobal.com)

## Smith, Alistair

---

**From:** Elhannah Houghton <Elhannah.Houghton@snowymonaro.nsw.gov.au>  
**Sent:** 16 August 2023 12:05  
**To:** Peterson, Richard  
**Cc:** Smith, Alistair  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

Hi Richard,

Thank you for giving Council the opportunity to provide feedback.

Council has no known concerns with the Boco Rock Wind Farm and no issues to raise at current

Kind regards,  
Elhannah

**Elhannah Houghton**  
Strategic Land Use Planner



PO Box 714  
COOMA NSW 2630

Direct (02) 6451 1360  
Phone  
Fax (02) 6456 3337  
[snowymonaro.nsw.gov.au](http://snowymonaro.nsw.gov.au)

**Think of the environment, please don't print this email unless you really need to**

Snowy Monaro Regional Council acknowledges the Traditional Custodians of the region's land and water: the Ngarigo, Walgalu, Southern Ngunnawal and Bidawal Peoples. We pay our respects to Elders past, present and emerging.

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## Peterson, Richard

---

**From:** Peterson, Richard  
**Sent:** Monday, 31 July 2023 2:49 PM  
**To:** info@epa.nsw.gov.au  
**Cc:** Smith, Alistair  
**Subject:** Boco Rock Wind Farm - Consent Number MP09\_0103, MP09\_0103 MOD1

To whom it may concern

I have been appointed by NSW Department of Planning and Environment to undertake an independent audit of the Boco Rock Wind Farm which is in its operational phase.

[About The Project | boco-rock-wind-farm \(bocorockwindfarm.com.au\)](https://www.bocorockwindfarm.com.au)

The purpose of this email is to Formally consult with EPA regarding any issues you would like us to consider for the audit

I am planning on undertaking the in late August so any feedback before say the 21<sup>st</sup> of August would be greatly appreciated

Many thanks in advance

**Richard Peterson**, *M Env Mgmt, BE (Civil)*

Associate  
Environmental Services

**Engineering, Design and Project Management**

**Tel:** +61 2 8239 8700

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DOC23/707255

Mr Richard Peterson  
Associate- Environmental Services  
SNC-Lavalin Atkins  
Level 17, 55 Clarence Street  
Sydney NSW 2000

10 August 2023

*By email: richard.peterson@atkinsglobal.com*

Dear Mr Peterson

**Boco Rock Wind Farm- EPL 20434- Independent Environmental Audit**

I refer to your email dated 31 July 2023 regarding input to the Independent Environmental Audit of Boco Rock Wind Farm at Avon Lake Road, Nimmitabel, NSW 2631.

The Environment Protection Authority (EPA) encourages independent audit by proponents to identify areas to improve their environmental performance.

There has been no recent EPA regulatory activity at the premises. I refer you to the EPA's public register <http://www.epa.nsw.gov.au/prpoeo/index.htm> where you can search for regulatory activity undertaken by the EPA for Environment Protection Licence 20434 for the Boco Rock Wind Farm.

However, the EPA recommends the audit should include a review of sediment and erosion control works, chemical storage and spill management procedures, and noise management plan at the premises.

Thank you for discussing the matter with the EPA. If you have any questions or wish to discuss the matter further, please contact Nirmala Dharmarathne on (02) 6229 7002 or at [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Rizzuto'.

Matthew RIZZUTO  
**Unit Head - Operations**

Phone 131 555  
Phone 02 9995 5555  
(from outside NSW)

TTY 133 677, then  
ask for 131 155

Locked Bag 5022  
PARRAMATTA  
NSW 2124

6&8 Parramatta  
Square 10 Darcy  
Street  
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[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)  
ABN 43 692 285 758



## APPENDIX F – Independent Audit Declaration Form

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## Independent Audit Declaration Form

Project Name **Boco Rock Wind Farm (BRWF)**

Consent Number **09\_0103**

Description of Project **Operational Audit of Boco Rock Wind Farm**

Project Address **1 Avon Lake Road, Springfield**

Proponent **Boco Rock Wind Farm Pty Ltd**

Title of Audit **Independent Environmental Audit - Boco Rock Wind Farm**

Date **13 October 2023**

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor **Richard Peterson**

Signature



Qualification **B Env Mgt, B.E (Civil)**

Company **SNC-Lavalin Australasia Pty Ltd**

Company Address **Level 10, 45 Clarence St, Sydney NSW 2000**