

Annual Compliance Report EPBC 2018/8141



Clarke Creek Wind Farm, Queensland
EPBC 2018/8141

7 March 2024 – 6 March 2025



Final

Revision Control

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DECLARATION OF ACCURACY

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed:	<u><i>John Macchiusi</i></u>
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Position (please print):	<u>Project Director</u>
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Date:	<u>3 April 2025</u>

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1 Introduction

This Annual Compliance Report has been prepared in relation to the Clarke Creek Wind Farm (the Project).

This report outlines the compliance of the Project with its relevant approval conditions under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), detailed within the approval decision dated 9 November 2018 (Ref. EPBC 2018/8141), and as varied on 5 September 2024.

On 5 September 2024 a variation to the project's approval was granted, resulting in an updated set of conditions. To ensure comprehensive reporting, this document presents compliance against both the original and the varied conditions. The report is structured to include two compliance tables ensuring full transparency in demonstrating compliance across both approvals during the reporting period.

This report has been prepared in accordance with Condition 25 and 25A to 25G of EPBC 2018/8141 as varied on 5 September 2024, which state:

Table 1: Condition 25 and 25A to 25G (annual compliance reporting)

Condition Number / reference	Condition
25	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period) .
25A	<p>The approval holder must include the following information in all compliance reports prepared for each ACR period following commissioning:</p> <ol style="list-style-type: none"> a count of all turbine strikes detected for EPBC Act listed bird and bat species in the project area and in each Phase, during the ACR period, and a compilation and analyses of information in relation to each turbine strike regarding: <ol style="list-style-type: none"> the method of detection; the species detected; prevailing environmental/meteorological conditions at the estimated time of the collision; and likely factors in the presence of the EPBC Act listed bird and bat species and EPBC Act listed migratory bird or bat species leading to the collision; estimations of annual mortality and injury rates for each EPBC Act listed threatened bird and bat species, calculated in accordance with the BBMP(s) for each Phase approved by the Minister; species occurrence records in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing; and an evaluation of effectiveness of the measures implemented during the reporting period to avoid and mitigate mortality and/or injury to EPBC Act listed threatened bird and bat species
25B	<p>The approval holder must ensure each compliance report includes:</p> <ol style="list-style-type: none"> accurate and complete details of compliance and any non-compliance with: <ol style="list-style-type: none"> each condition attached to this approval decision, and all commitments made in each plan, a schedule of all plans in effect in relation to these conditions during the ACR period, accurate and complete details of how each plan was implemented during the ACR period, and if any incident occurred, accurate and complete details of each incident
25C	The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
25D	<p>The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website:</p> <ol style="list-style-type: none"> each compliance report; and

Condition Number / reference	Condition
	b. a shapefile showing all clearing of protected matters , and their habitat, undertaken within the ACR period .
25E	The approval holder must: <ol style="list-style-type: none"> Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.
25F	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website . In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website .
25G	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report is published and until the expiry date of this approval.

Note: Compliance reports may be published on the **department's** website.

The following definitions apply in relation to Conditions 25, 25A to 25G:

- **Annual Compliance Report period or ACR period:** means each subsequent 12-month period following the date of **commencement** of the action until the expiry of this approval, unless otherwise specified in writing by the **Minister**
- **Business days:** means a day that is not a Saturday, a Sunday or a public holiday in the state of Queensland..
- **Commissioning:** means all activities, including turning of turbines, after the components of the wind turbines are installed.
- **Compliance report(s):** means a written report of compliance with, and fulfilment of, these conditions (including compliance with commitments made in plans).
- **Department:** means the Australian Government agency responsible for administering the EPBC Act.
- **EPBC Act listed threatened bird and bat species:** includes White-throated Needletail (*Hirundapus caudacutus*); Rainbow Bee-eater (*Merops ornatus*); Rufous Fantail (*Rhipidura rufifrons*); Fork-tailed Swift (*Apus pacificus*) and Satin Flycatcher (*Mviagra cvanoleuca*); Red Goshawk (*Erythroriorchis radiates*); and Corben's Long-eared Bat (*Nyctophilus corbeni*).
- **Minister:** means the Australian Government Minister administering the EPBC Act including any delegate thereof.
- **Phase(s):** means Phase 1 and/or Phase 2.
- **Phase 1:** means the areas within the project area south of the red line and cross hashed purple at Attachment A, comprising and entirely contained within lots: 8ROP41, 23CP896088, 18RP848821, 1RP801235, 1SP303299, 3RP801346, 3ROP178 and 4ROP192.

- **Plan(s):** means any of the documents required to be prepared, approved by the Minister, and/or implemented by the approval holder and published on the website in accordance with these conditions (includes action management plans and/or strategies).
- **Project area:** means the areas contained within the black and white dashed line at Attachment A, comprising and entirely contained within lots: RP614441, 10RP614442, 1SP153335, 8ROP41, 23CP896088, 18RP848821, 1RP801235, 1SP303299, 3RP801346, 3ROP178 and 4ROP192.
- **Protected matter(s):** means a matter protected under a controlling provision in Part 3 of the **EPBC Act** for which this approval has effect, including but not limited to **EPBC Act listed threatened bird and bat species**.
- **Sensitive ecological data:** means data as defined in the *Sensitive Ecological Data – Access and Management Policy V1.0, Commonwealth of Australia 2016*.
- **Website:** means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

This report has also been prepared in accordance with the 'Annual Compliance Report Guidelines 2014' published in 2023 by the Commonwealth Department of Climate Change, Energy, the Environment and Water.

2 Project Description

2.1 Project Details

Table 2: Project details

Project item	Description
Approval Decision reference	EPBC 2018/8141
Date that the approval was last varied	5 September 2024
Period for which the approval has effect	The approval has effect until 30 November 2050
Project name	Clarke Creek Wind Farm
Approval holder ACN / ABN	Clarke Creek Energy Pty Ltd ACN: 614 169 096; and Isaac Wind & Solar Energy Pty Ltd ACN: 615 593 078
Approved action	To construct and operate up to 195 wind turbines and associated ancillary infrastructure within the locality of Clarke Creek, 150 kilometres north-west of Rockhampton, Queensland; as described in the referral received by the Department on 15 January 2018 [See EPBC Act referral 2018/8141].
Project location	The Project is located within the Clarke Creek locality being within the Isaac Regional Council (IRC) and Livingstone Shire Council (LSC) local government areas, approximately 150 kilometres (km) north-west of Rockhampton in Central Queensland. The project layout is provided in Figure 1.
Date of commencement of the action	7 March 2022
Reporting period of this report	7 March 2024 – 6 March 2025
Date of preparation of the report	3 April 2025

2.2 Key Parties

- Squadron Energy – Principal
- Jacob's – Owners Engineer
- Catcon – Civil Balance of Plant Contractor
- BMD – Civil Balance of Plan Contractor
- Yurika – Electrical Balance of Plant Contractor
- Powerlink – Grid Operator / Contractor
- Goldwind Constructions Australia – Turbine Supplier and Installation Contractor
- Siemens – Synchronous Condenser and Transformer Supplier / Installer

The Project has been supported by a range of consultants to support delivery, monitoring, reporting and approvals, including:

- Nature Advisory – Bird and Bat Management Plan

- Umwelt Consultants and EcoK9 – Bird and bat monitoring program implementation
- Green Tape Solutions - Cycad translocation and monitoring, Offset Management Planning
- NGH Environmental – Flora and fauna pre-clearing surveys
- CQG Pty Ltd - Flora and fauna pre-clearing surveys

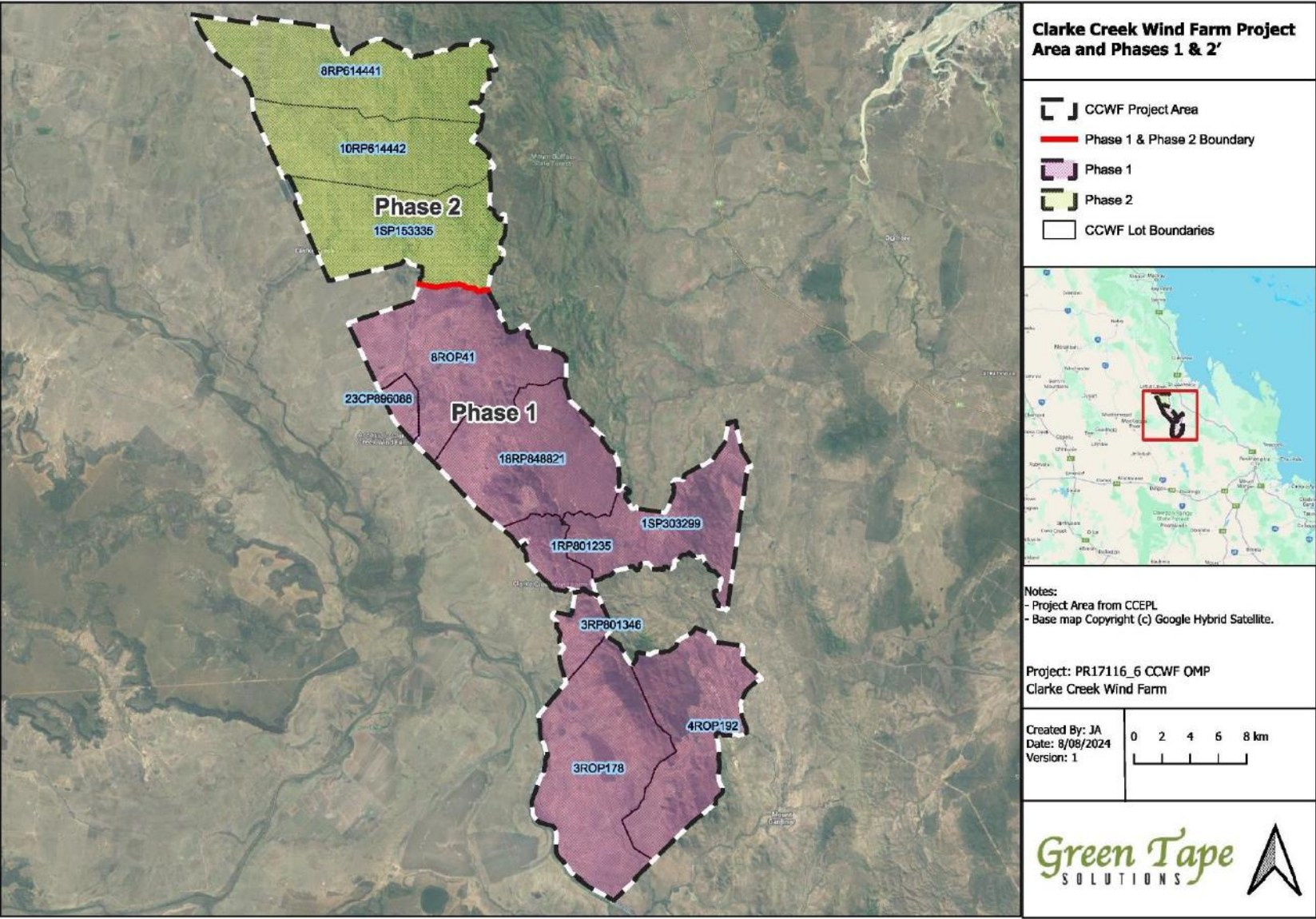


Figure 1: Clarke Creek Wind Farm Project Area and Phases 1 and 2

2.3 Environmental Management Framework

The site-based contractors and the owner's team have Occupational Health Safety & Environmental (OHS&E) staff onsite to manage all related OHS&E matters. Each Contractor has a Construction Environmental Management Plan (CEMP), Workplace Health and Safety Management Plan (WHSMP) and Project Management Plan which prescribe what environmental activities will be/are managed and how breaches/incidents are managed and notified to the Squadron Energy and regulators. These plans include and detail, where required, the relevant conditions and management plan requirements of the Commonwealth approval (EPBC 2018/8141) and Queensland State development approval for the Project.

2.4 Project Status

As at the end of the reporting year (ending 6 March 2025) the construction of Phase 1 was ongoing, and construction of Phase 2 had not yet commenced.

For Phase 1 of the project, the key activities undertaken during the reporting period are summarised in Table 3.

Table 3: Status of Phase 1 activities as at the end of the reporting period of Phase 1

Activity	Details and status as at end of reporting period
Vegetation clearing	Vegetation clearing to enable the construction of overhead power lines, access roads and hardstands.
Road and hardstand construction	Access roads to turbines – 100% complete.
Turbine foundations	100% of turbine foundations poured.
Overhead powerline construction	43km of 44 km of overhead powerlines constructed (approx. 98%)
Substation construction	Construction of three substations required for Phase 1 of the wind farm: <ul style="list-style-type: none"> Northern substation (approx. 90% complete) Central substation (100% complete) Southern substation (100% complete)
Synchronous condenser installation	The synchronous condenser installation is fully installed.
Turbine component delivery	Turbine component deliveries commenced in September 2023. 99% of complete turbines delivered to the site.
Turbine component installation	Turbine component installation commenced in September 2023. 77 turbines erected, 75 commissioned, 2 awaiting commissioning.
Turbine commissioning	Commissioning commenced 5 October 2024.
Plan preparation	Refer to the Schedule of Plans provided at Appendix A.

2.5 Directed Variation to EPBC 2018/8141 (5 September 2024)

After issuing three penalty infringement notices for the Project's non-compliance with three conditions of approval (as reflected in Table 5 below), the Minister initiated a variation to the conditions of approval (EPBC 2018/8141) under Section 143(1)(a) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The variation aimed to restore compliance and enhance the effectiveness of the conditions in achieving environmental outcomes and came into effect on the 5 September 2024.

This Annual Compliance Report presents compliance against both the original and the varied conditions of EPBC 2018/8141, during the ACR period. The report is structured to include two compliance tables ensuring full transparency in demonstrating compliance across both approvals during the reporting period. Refer to Section 3.2 for further details.

3 EPBC Act Approval Condition Compliance

3.1 Compliance Scoring

The designations in [Table 4](#) have been used to record compliance against the conditions.

Table 4: Designations used in the compliance assessment

Status	Description
Compliant:	Achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant:	The requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable:	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

3.2 Compliance Assessment

As noted above, the EPBC Approval was varied during the reporting period on 5 September 2024. As such, compliance assessment is provided separately for the periods prior to and following the approval variation, as follows:

- [Table 5](#) sets out compliance with the conditions of EPBC 2018/8141, as per the previous Approval conditions that were applicable between 7 March 2024 – 4 September 2024).
- [Table 6](#) sets out compliance with the varied conditions of approval, which have applied between 5 September 2024 – 6 March 2025.

The conditions of EPBC 2018/8141 have been reported in full. However, since construction of Phase 2 of the project has not yet commenced, any conditions of EPBC 2018/8141 specific to the commencement of construction or operation of Phase 2 have been recorded as 'Not applicable'.

Table 5: Compliance assessment for EPBC 2018/8141: 7 Mar – 5 Sept 2024 (prior to Directed Variation)

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
Construction/Clearance limits			
1	For the purpose of the action, the approval holder must not take any action outside the wind farm site.	Compliant	For the purposes of the action, the approval has not undertaken any action outside the wind farm site.
2	The approval holder must not construct more than 195 wind turbines and associated infrastructure on the wind farm site.	Compliant	The approval holder has not constructed more than 195 wind turbines and associated infrastructure on the wind farm site. Phase 1 of the wind farm comprises 100 wind turbines and associated infrastructure.
3	To minimise impacts to EPBC Act listed threatened species and communities, the approval holder must not clear more than:		
3 (a)	1513 ha of habitat suitable for the Koala	Compliant	The approval holder has not cleared more than 1513 ha of suitable habitat for the Koala.
3 (b)	17.83 ha of suitable habitat for the Greater Glider and Squatter Pigeon	Compliant	The approval holder has not cleared more than 17.83 ha of suitable habitat for the Greater Glider and Squatter Pigeon.
3 (c)	45.22 ha of the Semi-evergreen Vine Thicket on the wind farm site.	Compliant	The approval holder has not cleared more than 45.22 ha of Semi-evergreen Vine Thicket. Following additional detailed assessments of the vegetation on site, the EPBC-listed Semi-evergreen Vine Thicket was not confirmed on site for Stages 1 & 2. Consequently, no direct offset solution is proposed for this Matter of National Environmental Significance (MNES).

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
Environmental Management Plan			
4	<p>The approval holder must submit an Environmental Management Plan for the Minister's approval to minimise impacts to EPBC Act listed threatened species and communities and EPBC Act listed threatened bird and bat species.</p> <p>If the Minister approves the Environmental Management Plan then the approved Environmental Management Plan must be implemented.</p>	Compliant	<p>A Biodiversity Management Plan (BMP) was submitted to the Minister for approval. The BMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Biodiversity Management Plan, Revision 3.4, dated 10 September 2021 (the BMP) (updated per condition 32 of EPBC 2018- 8141 and the Minister was notified per condition 33).</p> <p>The BMP has been implemented during the reporting period.</p> <p>On 24 July 2024, there was one instance of a non-compliance with the commitments made in the BMP, more specifically, Section 2.3 which related to the Species Management Program (SMP) for the Project (a requirement under the <i>Nature Conservation Act 1992</i>).</p> <p>On 23 July 2024, the construction personnel had identified a Striated Pardalote nesting site at a turbine site and, after an inspection using an endoscope camera, determined it was unoccupied, allowing excavation to proceed. During excavation, a nest containing young birds was discovered, prompting an immediate halt to work, notification of the Fauna Spotter Catcher (FSC), and attempts to restore and protect the nest. On 24 July 2024, the FSC inspected the site and reported that the nest had caved in, four deceased Striated Pardalote chicks were found, and the nest appeared to have been tampered with by an unauthorised person. The incident resulted in non-compliance a commitment made in the BMP, specifically with Section 2.3 which related to the Species Management Program (SMP) due to the failure to have a suitably qualified person present for nest management and unauthorised tampering with an animal breeding place.</p> <p>The non-compliance was reported to the Department as required by Condition 26 & Condition 27 of the approval and compliance was restored following close out of the investigation, implementation of corrective actions and submission of the Animal Breeding Places Register to the Department of Environment, Science and Innovation (DESI), in accordance with the High-risk SMP.</p>

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
5	The approval holder must not commence the action unless the Minister has approved the Environmental Management Plan in writing.	Compliant	The BMP was approved prior to commencement of the action on 7 March 2022.
6	The Environmental Management Plan must include specific details of the management actions and outcomes for the protection of EPBC Act listed threatened species and communities and EPBC Act listed threatened bird and bat species, including how measures outlined take into account relevant conservation advice and are consistent with the measures in all relevant recovery plans and threat abatement plans.	Compliant	<p>Appendix E - MNES and MSES Profiles of the BMP provides specific management approaches for the EPBC Act listed threatened species and communities including:</p> <ul style="list-style-type: none"> • Squatter Pigeon (<i>Geophaps scripta scripta</i>) • Koala (<i>Phascolarctos cinereus</i>) • Greater Glider (<i>Petauroides Volans</i>) • Red Goshawk (<i>Erythrorhynchus radiatus</i>) • Corben's Long-eared Bat (<i>Nyctophilus corbeni</i>) • Grey Falcon (<i>Falco hypoleucos</i>) • Ornamental Snake (<i>Denisonia maculata</i>) • Cycads (<i>Cycas megacarpa</i>, <i>Cycas ophiolitica</i>) • Semi-evergreen Vine Thickets (SEVT) of the Brigalow Belt <p>Sections 1.4 and 5 of the BMP provides performance indicators for the environmental objectives and relevant management actions, respectively.</p>
7	The Environmental Management Plan must be consistent with the Environmental Management Plan Guidelines, and must include:	Compliant	The BMP is consistent with the Environmental Management Plan Guidelines.
7 (a)	The environmental objectives, relevant protected matter(s) and a reference to EPBC Act approval conditions to which the Environmental Management Plan refers.	Compliant	<p>Section 1.4 of the BMP includes the environmental objectives and relevant protected matters.</p> <p>Table 2-1 of the BMP includes the EPBC Act approval conditions.</p>
7 (b)	A table of commitments made in the Environmental Management Plan to achieve the objectives, and a reference to where the commitments are detailed in the Environmental Management Plan.	Compliant	Section 2.1 of the BMP provides a table of the commitments and references to the section where they are detailed.
7 (c)	Reporting and review mechanisms, and documentation standards to demonstrate compliance with the Environmental Management Plan.	Compliant	Section 6.4 of the BMP provides detail on the reporting mechanisms and Section 7.5 details the audit and review process. The reporting requirements include an Annual Compliance Report and quarterly Species Management Program reporting.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
7 (d)	An assessment of risks to achieving the Environmental Management Plans environmental objectives and risk management strategies that will be applied.	Compliant	Section 5.6 of the BMP provides the risk assessment to achieving the environmental objectives.
7 (e)	Impact avoidance, mitigation and/or repair measures, and their timing.	Compliant	Section 5 of the BMP details impact avoidance, mitigation measures, management actions and risk assessment.
7 (f)	A monitoring program, which must include: <ul style="list-style-type: none"> i. measurable performance indicators; ii. trigger values for corrective actions; iii. the timing and frequency of monitoring to detect changes in the performance indicators and timely detection of trigger values; and iv. proposed corrective actions if trigger values are reached. 	Compliant	Table 6.1 of the BMP provides a monitoring schedule with performance indicators, timing and frequency of monitoring.
7 (g)	Reference to other relevant plans and/or conditions of approval (including State/Territory).	Compliant	Reference to the conditions of approval is made in Section 2 of the BMP which includes the EPBC Act conditions of approval and Queensland Government's Department of State Development, Infrastructure, Local Government and Planning's development approval conditions pertaining to the requirement for a Vegetation and Fauna Management Plan.
Cycad(s) Management			
8	For the protection of listed Cycad(s) species, the approval holder must include within the Environmental Management Plan a Cycad(s) translocation program that:	Compliant	A Cycad Translocation and Management Plan was submitted to the Minister for approval. The CTMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Cycad Translocation and Management Plan, Revision V5, dated 8 November 2021 (the CTMP), as included within the BMP as Appendix G (updated per condition 32 of EPBC 2018-8141 and the Minister was notified per condition 33).
8 (a)	Is in accordance with the National multi-species recovery plan and the Guidelines for translocation of threatened plants.	Compliant	The CTMP was been developed in accordance with the National Multi-Species Recovery Plan for Cycads (Queensland Herbarium, 2007), the Guidelines for the Translocation of Threatened Plants in Australia (Commander et al., 2018) and the conditions stipulated under the EPBC Act approval. The CTMP is being implemented by all relevant parties throughout construction.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
8 (b)	Specifies the number of Cycad(s) that cannot be avoided by the action.	Compliant	Section 2.1 of the CTMP outlines that a survey conducted in March 2021 did not identify any EPBC-listed Cycads within the Project footprint cleared to date. All cycads encountered to date have been identified as <i>C. terryana</i> , which is not an EPBC-listed species and thus outside the remit of the EPBC Act approval (relevant to the Queensland Department of Environment Science and Innovation protected plants approval).
8 (c)	Specifies the procedure for the relocation of Cycad(s) to areas outside of the impact areas suitable for their survival.	Compliant	Section 4 of the CTMP details the procedure for the translocation of Cycads to areas outside of the impact areas.
8 (d)	Identifies where Cycad(s) will be translocated to.	Compliant	Figures 2-1 and 2-2 of the CTMP identifies where the Cycads will be translocated to. Section 2.3 describes that the final recipient site/s will be defined following the completion of the detailed design and further consultation with the respective landowners.
8 (e)	Specifies ongoing management to enable the successful re-establishment of translocated cycads.	Compliant	Section 7 of the CTMP identifies the management and mitigation actions for any translocated and propagated cycads.
8 (f)	Specifies the process for monitoring and reporting the progress and ultimate success (health) of translocated individuals.	Compliant	Section 8 of the CTMP details the monitoring and reporting process.
8 (g)	Specifies the program for propagating Cycad(s) to replace any relocated individuals that have not survived the translocation process.	Compliant	Section 5 of the CTMP details the seed collection and propagation process.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
Threatened Bird and Bat Management			
9	The approval holder must submit a Threatened Bird and Bat Management Plan for the Minister's approval that ensures the protection of EPBC Act listed threatened bird and bat species. If the Minister approves the Threatened Bird and Bat Management Plan then the approved Threatened Bird and Bat Management Plan must be implemented.	Compliant	<p>A proposed Bird and Bat Management Plan (BBMP) was first submitted to the Department for Minister's approval in December 2020.</p> <p>During the reporting period, the BBMP was being revised by the approval holder to address comments received from the Department. This included submission of revised BBMP documents to the Department on:</p> <ul style="list-style-type: none"> • 11 June 2024 (revised BBMP v4.14) • 26 August 2024 (revised BBMP v4.15) • 28 August 2024 (revised BBMP v4.16). <p>On 5 September 2024, the Department provided their written approval of the Bird and Bat Management Plan (v4.16).</p>
10	The approval holder must not begin operation of the wind farm unless the Minister has approved the Threatened Bird and Bat Management Plan in writing.	Compliant	The operation of the wind farm commenced after the Minister had approved the BBMP in writing.
11	The Threatened Bird and Bat Management Plan must be consistent with the Department's Environmental Management Plan Guidelines, and must include:	Compliant	The BBMP has been prepared consistent with the Departments Environmental Management Plan Guidelines.
11 (a)	The Threatened Bird and Bat Management Plan environmental objectives, for relevant protected matter(s) and a reference to EPBC Act approval conditions to which the Threatened Bird and Bat Management Plan refers.	Compliant	<p>The environmental objectives for the relevant protected matters are included in Section 1.4 (Table 2) of the BBMP.</p> <p>References to the approval conditions to which the BBMP relates are included in Sections 1.2 and 1.3 of the BBMP.</p>
11 (b)	A table of commitments made in the Threatened Bird and Bat Management Plan to achieve the objectives, and a reference to where the commitments are detailed in the Threatened Bird and Bat Management Plan.	Compliant	Commitments to achieve the objectives are included in Section 1.4 of the BBMP, along with a reference to where the commitments are detailed within the BBMP (Table 2).
11 (c)	Reporting and review mechanisms, and documentation standards to demonstrate compliance with the Threatened Bird and Bat Management Plan.	Compliant	Reporting and review mechanisms are included in Section 9 of the BBMP.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
11 (d)	An assessment of risks to achieving the Threatened Bird and Bat Management Plan's environmental objectives and risk management strategies that will be applied.	Compliant	An assessment of risks is included in Section 8 of the BBMP.
11 (e)	Impact avoidance, mitigation and/or repair measures, and their timing.	Compliant	Impact avoidance measures are included in Section 3 of the BBMP. Impact mitigation measures are included in Section 5 (Table 7) of the BBMP.
11 (f)	A monitoring program, which must include: <ul style="list-style-type: none"> i. measurable performance indicators; ii. trigger values for corrective actions; iii. the timing and frequency of monitoring to detect changes in the performance indicators and timely detection of trigger values; iv. mortality monitoring; and v. proposed corrective actions if trigger values are reached. 	Compliant	A monitoring program is included in Section 4 of the BBMP.
11 (g)	Provide any links to other plans or conditions of approval (including State/Territory approval conditions).	Compliant	Links (references) to other plans or conditions of approval are included in Section 1.2 and Section 1.3 of the BBMP.
11 (h)	Details of mitigation measures to minimise impacts on EPBC Act listed threatened bird and bat species including but not limited to: <ul style="list-style-type: none"> i. measures to minimise impacts associated with lighting, such as preventing the attraction of EPBC Act listed threatened bird and bat species and prey species to locations with high risk of collision with turbines; ii. measures to minimise the risk of turbine collision with EPBC Act listed threatened bird and bat species, such as, but not limited to, bird and insect deterrents and low wind speed curtailment. 	Compliant	Mitigation measures to minimise impacts associated with lighting are included in Section 3 of the BBMP. Mitigation measures to minimise the risk of turbine collision are included in Section 3. These include bat deterrents, low wind speed cut-in, and pest animal control.
11 (i)	Details of how the effectiveness of mitigation measures will be monitored and reported as part of the annual compliance reporting.	Compliant	Details of how the effectiveness of mitigation measures will be monitored and reported on are included in Section 9.1.1 and 9.1.2 of the BBMP.
11 (j)	Procedures for dealing with any EPBC Act listed threatened bird and bat species require relocation or are injured on the wind farm site.	Compliant	An injured bird and bat protocol is included in Section 6 of the BBMP.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
11 (k)	A program of monitoring and reporting to determine the effectiveness of management measures and inform adaptive implementation of management measures to minimise the impacts to EPBC Act listed threatened bird and bat species.	Compliant	A program of monitoring and reporting is included at Sections 4, 5 and 9 of the BBMP.
12	Within three (3) months of every 12 month anniversary of the commencement of the commissioning of the wind farm, the approval holder must publish a report detailing how condition 9 is being met and evaluating the effectiveness of the measures to avoid and mitigate the impacts of turbine collision to EPBC Act listed threatened bird and bat species on the wind farm site.	Not applicable	Commissioning of Phase 1 commenced on 5 October 2024. It is noted that this Condition was revoked as part of the variation to EPBC 2018/8141 on 5 September 2024.
13	If one or more annual report(s) required under condition 12 demonstrates that the action has resulted in residual significant impacts to EPBC Act listed threatened bird and bat species the approval holder must, within 12 months of being aware of such impact and/or detecting a trigger specified in the Offset Strategy (see condition 14 (e)), provide an offset in accordance with the EPBC Act Environmental Offsets Policy. The approval holder must obtain the approval of the Department for the proposed offset prior to providing it.	Not applicable	Commissioning of Phase 1 commenced on 5 October 2024. It is noted that this Condition was revoked as part of the variation to EPBC 2018/8141 on 5 September 2024.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
Offsets			
14	<p>To compensate for the impacts of clearing the approval holder must submit an Offset Strategy for the written approval of the Minister. The action must not commence until the Offset Strategy has been approved by the Minister.</p> <p>If the Minister approves the Offset Strategy then the approved Offset Strategy must be implemented. The Offset Strategy must be prepared by a suitably qualified person in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines.</p> <p>The Offset Strategy must:</p>	Non-compliant	<p>An Offset Strategy (version 2.8, dated 16 December 2020) was prepared and submitted to the Minister for approval.</p> <p>The Offset Strategy was prepared in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines.</p> <p>The Offset Strategy was prepared by suitably qualified persons from NGH Environmental, Green Tape Solutions and Nature Advisory. Their persons and their qualifications are documented in Section 1.1.1 of the Offset Strategy.</p> <p>The Minister provided written approval on 23 December 2020, prior to the commencement of the action.</p> <p>A non-compliance has been recorded because the approval holder did not, in accordance with the approved Offset Strategy, submit and have approved, the Offset Management Plan within 12 months of commencement of the action (see Condition 15). On 2 May 2024, the Department wrote a letter to the approval holder which served as the warning notice for, and finalised, the compliance matter relating to the above-mentioned non-compliance with condition 14.</p> <p><i>Note:</i></p> <p><i>On 5 September 2024, a variation was made to EPBC Approval 2018/8141 to enable the phased delivery of offsets. Additional conditions were introduced in relation to the Offset Management Plan required by Condition 15. The Offset Management Plan has since been revised in accordance with the varied conditions of EPBC Approval 2018/8141 (refer to Table 6, varied Condition 15). The revised OMP (v3.2) identifies the ways in which the offset strategy is being implemented.</i></p>

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
14 (a)	Propose an offset package, including potential offset sites, in accordance with the EPBC Act Environmental Offsets Policy, to compensate the loss of: <ul style="list-style-type: none"> i. Koala habitat; ii. Greater Glider habitat; and iii. Semi-evergreen Vine Thicket. 	Compliant	A proposed offset package, including potential offset sites, is included in Section 3 of the approved Offset Strategy.
14 (b)	Provide offset calculations, including all inputs to the calculations, used to prepare the offset package proposal.	Compliant	Section 3.3 and Appendix A of the Offset Strategy detail the offset calculations.
14 (c)	Propose measures for the long term protection and management of offset sites.	Compliant	Sections 2.9.1 and 4.1 of the Offset Strategy provide the mitigation measures and management actions for the offset sites.
14 (d)	Proposed a timeline and legal mechanism for securing the offset sites to meet the offset requirement in Condition 15.	Compliant	Section 3.2 of the Offset Strategy provides details of the legal offset mechanism. Table 3-3 provides the estimated timeframe for legally securing the offsets.
14 (e)	Determine and justify trigger levels for the requirement to provide an offset for significant residual impacts on EPBC Act listed threatened bird and bat species.	Compliant	Section 2.11.1 of the Offset Strategy defines the trigger levels to provide an offset for significant residual impacts on EPBC Act listed threatened bird and bat species.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
15	<p>Within 12 months of commencement of the action, and prior to the commissioning of wind turbines, the approval holder must submit, and have approved by the Minister, an offset management plan.</p> <p>The Offset Management Plan must be prepared by a suitably qualified person in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines and include:</p>	Non-compliant	<p>A proposed Offset Management Plan (the OMP) was submitted to the Minister on 3 March 2023, within 12 months of commencing the action, however the Minister's approval was not obtained within the time-period. Non-compliance with this condition was therefore documented in the previous Annual Compliance Report (dated 3 June 2024).</p> <p>The approval holder submitted a revised OMP (v2.0) to the Department during the reporting period on 15 March 2024. The Department provided comments on 6 June 2024. The approval holder continued developing the OMP to address the Departments comments (further detail is provided in Table 6 against varied Condition 15).</p> <p><i>Note:</i></p> <p><i>On 5 September 2024, a variation was made to Condition 15 of EPBC Approval 2018/8141 to enable the phased delivery of offsets. Additional conditions were also introduced in relation to the Offset Management Plan (refer to Table 6). The directed variation initiated by the Minister restored the project compliance with this condition (refer to Table 6, varied Condition 15).</i></p>
15 (a)	Details of the environmental offset/s to compensate for the loss of habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the wind farm site.	Compliant	Details of the environmental offsets were included in Section 3 of the OMP (v2.0), which had been submitted to the Department on 15 March 2024.
15 (b)	A description and map (including shapefiles) to clearly define the location and boundaries of the proposed offset area/s, accompanied by the offset attributes.	Compliant	<p>A description was included in Section 3 of the OMP (v2.0).</p> <p>A map was provided in Figure 2 of the OMP (v2.0).</p> <p>Shapefiles defining the location and boundaries of the proposed offset sites was provided to the Department with the OMP (v2.0).</p>
15 (c)	Details, including but not limited to, the extent and quality of the habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site/s.	Compliant	Details were provided in Section 3, Appendix 1 and Appendix 2 of the OMP (v2.0).
15 (d)	The proposed timeline and legal mechanism for securing the offset(s).	Compliant	A proposed timeline was provided in Section 7 of the OMP (v2.0).

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
15 (e)	A description of the current condition (prior to the proposed management activities) of the proposed offset site/s, including existing vegetation (the baseline condition).	Compliant	A description was provided in Section 3 of the OMP (v2.0).
15 (f)	A description of the proposed management measures (including timing, frequency and duration) that will be implemented on the offset site/s.	Compliant	A description of proposed management measures was provided in Section 4 of the OMP (v2.0).
15 (g)	Performance and completion criteria for evaluating the management of the offset site/s, and criteria for triggering remedial action (if necessary)	Compliant	Performance and completion criteria were provided in Section 5 and Section 8 of the OMP (v2.0).
15 (h)	Details of how the offset will improve habitat availability for Koala, Greater Glider and Semievergreen Vine Thicket.	Compliant	Details were provided in Section 4 of the OMP (v2.0).
15 (i)	Details of how the offset will provide landscape scale habitat connectivity.	Compliant	Details were provided in Section 4 of the OMP (v2.0).
15 (j)	A description of the management measures that will be implemented on the offset site for the protection and management of habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket, including a discussion of how measures proposed are consistent with the measures in conservation advice, recovery plans and relevant threat abatement plans.	Compliant	A description of management measures was provided in Section 4 of the OMP (v2.0).
15 (k)	A program, including timelines to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria, and to detect triggers for remedial action.	Compliant	A program was provided in Section 8 of the OMP (v2.0).
15 (l)	A description of potential risks to the successful implementation of the plan, and a description of the contingency measures that will be implemented to mitigate against these risks.	Compliant	A description of potential risks was provided in Section 6 of the OMP (v2.0).
16	The approved Offset Management Plan must be implemented.	Not applicable	The Offset Management Plan had not been approved by the Minister during the reporting period.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
17	The approval holder must legally secure the offset sites required under the Offset Management Plan within 2 years of the commencement of the action.	Non-compliant	<p>The approval holder did not legally secure offset sites within 2 years of the commencement of the action.</p> <p>On 7 March 2024, the approval holder made a non-compliance notification to the Department in accordance with Condition 26. On 20 March 2024, the approval holder provided further details of the non-compliance to the Department in accordance with Condition 27.</p> <p>As detailed in the approved Offset Strategy, the approval holder intends to legally secure the offset sites via the Queensland Voluntary Declaration (VDec) process. The approval holder will be able to progress the VDec application process once the Minister has approved the OMP.</p> <p><i>Note:</i></p> <p><i>On 5 September 2024, a variation was made to Condition 17 of EPBC Approval 2018/8141, which amended the timeframe for legally securing the offset sites. The directed variation initiated by the Minister has restored the project compliance with this condition (see Table 6, varied Condition 17).</i></p>
Notification of date of commencement of the action			
18	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	<p>On 16 March 2022, the approval holder wrote to the Department to provide formal notification that the action commenced on 7 March 2022. The written notification was provided seven (7) business days after the date of commencement of the action.</p> <p>On 29 March 2022, the Department provided a letter response which acknowledged receipt of the notification in accordance with Condition 18 of the approval.</p>
19	The approval holder must notify the Department in writing of the date of commissioning within 10 business days after the date of commissioning.	Not applicable	As at 4 September 2024, commissioning had not yet commenced.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
20	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Not applicable	The commencement of the action occurred on 7 March 2022, within 5 years of the date of the approval. The approval is dated 9 November 2018.
Compliance records			
21	The approval holder must maintain accurate and complete compliance records.	Compliant	The approval holder maintains accurate and complete compliance records.
22	<p>If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</p>	Compliant	No written request was received between 7 March 2024 – 4 September 2024.
Preparation and publication of plans			
23	The approval holder must:		

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
23 (a)	Submit plans electronically to the Department for approval by the Minister.	Compliant	<p>The plans have been submitted electronically to the Department for approval by the Minister.</p> <p>The BMP (Condition 4) was submitted electronically, and Ministers approval was received on 12 June 2020. The BMP was revised 10 September 2021 per condition 32, and the Minister was notified per condition 33.</p> <p>The CTMP (Condition 8) was submitted electronically, and Minister's approval was received on 12 June 2020. The CTMP was revised 8 November 2021 per condition 32, and the Minister was notified per condition 33.</p> <p>The BBMP (Condition 9) was first submitted electronically in December 2020 for approval by the Minister. The BBMP was later revised and resubmitted electronically on 3 March 2023, 12 September 2023, 28 November 2023, and 22 December 2023. Minister's approval of the BBMP had still not been received in the reporting period.</p> <p>The OMP (Condition 15) was submitted 3 March 2023 for approval by the Minister. A revised OMP (v2.0) was submitted on 15 March 2024.</p>
23 (b)	Publish each plan on the website within 20 business days of the date the plan is approved by the Minister or of the date a revised action management plan is submitted to the Minister, unless otherwise agreed to in writing by the Minister.	Compliant	<p>Plans currently published on the website were published within 20 business days of the date of Minister approval.</p> <p>No additional plans were published to the website between 7 March – 4 September 2024.</p> <p>The BBMP was published on the website on 9 September 2024, within 20 business days of Minister approval date.</p>
23 (c)	Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public.	Compliant	Sensitive ecological data has not been included on the plans published on the website.
23 (d)	Keep plans published on the website until the end date of this approval.	Compliant	Approved plans continue to remain published on the website.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
24	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan or conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan.	Compliant	Where required by a Plan, data has been submitted electronically to the Department in accordance with the requirements of the Plan.
Annual compliance reporting			
25	The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:	Compliant	The second annual compliance report was prepared for 12 month reporting period between 7 March 2023 to 6 March 2024.
25 (a)	Publish each compliance report on the website within 60 business days following the relevant 12 month period.	Compliant	The second Annual Compliance Report was published on the website on 4 June 2024, 59 business days following the 12-month anniversary of commencing the action.
25 (b)	Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication.	Compliant	On 5 June 2024 (1 business day after publication), the Department were notified by email that the second compliance report had been published on the website. Shapefiles relating to clearance of protected matters or their habitat were included in the email to the Department. The shapefiles were inclusive of clearance of any protected matters, or their habitat, undertaken within the relevant 12 month period, being 7 March 2023 – 6 March 2024.
25 (c)	Keep all compliance reports publicly available on the website until this approval expires.	Compliant	The compliance report continues to remain published on the website.
25 (d)	Exclude or redact sensitive ecological data from compliance reports published on the website.	Not applicable	Sensitive ecological data was not included in the second annual compliance report, which was published on the website on 4 June 2024.
25 (e)	Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. Note: Compliance reports may be published on the Department's website.	Not applicable	Sensitive ecological data was not included in the second annual compliance report, published on the website on 4 June 2024.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
Reporting non-compliance			
26	<p>The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <ol style="list-style-type: none"> The condition which is or may be in breach. A short description of the incident and/or noncompliance. 	Compliant	<p>Non-compliance notification 7 March 2024:</p> <p>On 7 March 2024, the approval holder made a non-compliance notification to the Department via email in accordance with Condition 26. The reported non-compliance was in relation to Condition 17 (refer to details provided above against Condition 17 of this Table).</p> <p>Non-compliance notification 26 July 2024:</p> <p>On 26 July 2024, a non-compliance was notified to the department via email in accordance with Condition 26. The non-compliance notified related to a non-compliance with a commitment in the Biodiversity Management Plan, specifically, Section 2.3 which related to the Species Management Program (SMP) for the Project (a requirement under the <i>Nature Conservation Act 1992</i>) (refer to details provided against Condition 4 of this Table).</p> <p>The notification was provided within 2 business days of becoming aware of the non-compliance.</p>
27	<p>The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ol style="list-style-type: none"> Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future. The potential impacts of the incident or noncompliance. The method and timing of any remedial action that will be undertaken by the approval holder. 	Compliant	<p>In relation to the non-compliance that was first notified to the Department on 7 March 2024 (refer above), further details were later provided to the Department via email on 20 March 2024, in compliance with the requirements of Condition 27.</p> <p>In relation to the non-compliance that was first notified to the Department on 26 July 2024 (refer above), further details were later provided to the Department via email on 7 August 2024, in compliance with the requirements of Condition 27. The Department responded via email on 7 August 2024.</p>
Independent audit			
28	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Not applicable	The Minister did not request any independent audit of compliance with the conditions during the reporting period.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
29	For each independent audit, the approval holder must: <ul style="list-style-type: none"> a. Provide the name and qualifications of the independent auditor and the draft audit criteria to the Department. b. Only commence the independent audit once the audit criteria have been approved in writing by the Department. c. Submit an audit report to the Department within the timeframe specified in the approved audit criteria. 	Not applicable	The Minister did not request any independent audit of compliance with the conditions during the reporting period.
30	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not applicable	The Minister did not request any independent audit of compliance with the conditions during the reporting period.
Revision of action management plans			
31	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 4, 9 and 14 or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
32	The approval holder may choose to revise an action management plan approved by the Minister under conditions 4 and 9, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
33	If the approval holder makes the choice under condition 32 to revise an action management plan without submitting it for approval, the approval holder must:	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
33 (a)	<p>Notify the Department in writing that the approved action management plan has been revised and provide the Department with:</p> <ul style="list-style-type: none"> i. an electronic copy of the RAMP; ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. 	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
33 (b)	Subject to condition 35, implement the RAMP from the RAMP implementation date.	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
34	The approval holder may revoke its choice to implement a RAMP under condition 32 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 32, the approval holder must implement the previous action management plan approved by the Minister.	Not applicable	The approval holder has not revoked a RAMP.
35	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:	Not applicable	No notice was received during the reporting period.
35 (a)	Condition 32 does not apply, or ceases to apply, in relation to the RAMP.	Not applicable	No notice was received during the reporting period.
35 (b)	The approval holder must implement the action management plan specified by the Minister in the notice.	Not applicable	No notice was received during the reporting period.

Condition Number / reference	Condition	Was the project compliant with this condition?	Comments
36	At the time of giving the notice under condition 35, the Minister may also notify that for a specified period of time, condition 32 does not apply for one or more specified action management plans.	Not applicable	No notice was received during the reporting period.
Completion of the action			
37	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not applicable	The action is not yet completed.

Table 6: Compliance Assessment for EPBC 2018/8141: 5 Sept 2024 – 6 Mar 2025 (after Directed Variation)

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
Construction / Clearance limits			
1	The approval holder must not undertake any clearing or construction outside of the project area .	Compliant	For the purposes of the action, the approval has not undertaken any clearing or construction outside the wind farm site.
2	The approval holder must not construct more than 195 wind turbines and associated infrastructure in the project area	Compliant	The approval holder has not constructed more than 195 wind turbines and associated infrastructure on the wind farm site. Phase 1 of the wind farm is currently under construction and comprises 100 wind turbines and associated infrastructure.
2A	The approval holder must not construct more than 100 wind turbines and associated infrastructure in Phase 1 .	Compliant	Phase 1 of the wind farm comprises 100 wind turbines only.
2B	The approval holder must not construct more than 95 wind turbines and associated infrastructure in Phase 2 .	Compliant	Phase 2 of the wind farm will comprise up to 95 wind turbines only.
3	The approval holder must not clear more than:		
3 (a)	1513 hectares (ha) of Koala habitat .	Compliant	The approval holder has not cleared more than 1513 ha of Koala habitat. Clearing records indicate that as of March 2025, a total of approximately 409.71 ha of koala habitat had been cleared since the commencement of the action.
3 (b)	17.83 ha of Greater Glider habitat .	Compliant	The approval holder has not cleared more than 17.83 ha of Greater Glider habitat. Clearing records indicate that as of March 2025, a total of approximately 1.95 ha of Greater Glider habitat had been cleared since the commencement of the action.
3 (c)	17.83 ha of Squatter Pigeon habitat .	Compliant	The approval holder has not cleared more than 17.83 ha of Squatter Pigeon habitat. Clearing records indicate that as of March 2025, a total of approximately 1.95 ha of Squatter Pigeon habitat had been cleared since the commencement of the action.
3 (d)	45.22 ha of Semi-evergreen Vine Thicket within the project area .	Compliant	The approval holder has not cleared more than 45.22 ha of Semi-evergreen Vine Thicket.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			Following additional detailed assessments of the vegetation on site, the EPBC-listed Semi-evergreen Vine Thicket was not confirmed on site for Phase 1. Consequently, no direct offset solution is proposed for this Matter of National Environmental Significance (MNES) for Phase 1.
Environmental Management Plan			
4	The approval holder must implement the Biodiversity Management Plan until the completion of the action .	Compliant	<p>A Biodiversity Management Plan (BMP) was submitted to the Minister for approval. The BMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Biodiversity Management Plan, Revision 3.4, dated 10 September 2021 (the BMP) (updated per condition 32 of EPBC 2018- 8141 and the Minister was notified per condition 33).</p> <p>The BMP has been implemented during the reporting period. Appendix B provided a review of the effectiveness of the BMP during the reporting period.</p>
5	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
6	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
7	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Cycad(s) Management			
8	The approval holder must not translocate any Cycad(s) otherwise than in accordance with the Biodiversity Management Plan .	Compliant	<p>The BMP, Revision 3.4, dated 10 September 2021, includes a Cycad Translocation and Management Plan (CTMP), as Appendix G.</p> <p>The CTMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Cycad Translocation and Management Plan, Revision V5, dated 8 November 2021 updated per condition 32 of EPBC 2018-8141 and the Minister was notified per condition 33.</p> <p>Section 2.1 of the CTMP outlines that a survey conducted in March 2021 did not identify any EPBC-listed Cycads within the Phase 1</p>

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<p>Project footprint cleared to date. All cycads encountered to date have been identified as <i>C. terryana</i>, which is not an EPBC-listed species and thus outside the remit of the EPBC Act approval (relevant to the Queensland Department of Environment Science and Innovation protected plants approval). Refer to Appendix A and B.2 for further information.</p> <p>Should any EPBC-listed Cycads be identified within Phase 2 of the project, translocation, where required, will be undertaken in accordance with the CTMP.</p>
Threatened Bird and Bat Management			
9	To avoid and mitigate impacts to EPBC Act listed bird and bat species from turbine collision and barotrauma in Phase 1 , the approval holder must implement the Phase 1 Bird and Bat Management Plan until the completion of the action .	Compliant	The Phase 1 Bird and Bat Management Plan (BBMP) (v4.16, dated 27 August 2024) was approved by the Minister on 5 September 2024. The Phase 1 BBMP is being implemented.
10	To avoid and mitigate impacts to EPBC Act listed bird and bat species from turbine collision and barotrauma in Phase 2 , the approval holder must submit a Bird and Bat Management Plan (BBMP) for Phase 2 (Phase 2 BBMP) to the department for the Minister's approval.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval. The construction of Phase 2 of the Project had not commenced during the reporting period.
10A	The approval holder must not commence commissioning in Phase 2 unless the Minister has approved the Phase 2 BBMP in writing.	Not applicable	The approval holder had not commenced construction or commissioning in Phase 2 of the Project during the reporting period.
11	The Phase 2 BBMP submitted for the Minister's approval must meet the requirements specified in Attachment N.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval.
11A	The approval holder must implement the Phase 2 BBMP approved by the Minister from commencement of commissioning in Phase 2 until the completion of the action .	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval. The construction of Phase 2 of the Project had not commenced during the reporting period.
11B	At the same time that the approval holder submits the Phase 2 BBMP to the department , the approval holder must also submit to the department for the Minister's approval, a revised version of the Phase 1 Bird and Bat Management Plan that meets the requirements of condition 11C of this approval.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
11C	<p>The revised Phase 1 Bird and Bat Management Plan submitted for the Minister's approval in accordance with condition 11B of this approval, must:</p> <ul style="list-style-type: none"> a. align the post-commissioning fatality monitoring and adaptive management in Phase 1 with that set out in the BBMP for Phase 2; b. specify and statistically justify the site-specific survey effort at temporal and spatial resolutions (study duration, turbine sample, search interval, search plot, transect width), that will be implemented post-commissioning in the project area, for EPBC Act listed bird and bat species; c. specify and statistically justify the effort required to undertake site-specific carcass detectability trials, including the timing and frequency of searcher efficiency and carcass persistence trials, as well as corrections of unsearched areas (i.e. density weighted proportion analysis) to accurately correct for bias in calculating annual mortality estimates; d. include details of requirements for DNA testing of carcasses that cannot be otherwise identified by a suitably qualified bird and bat ecologist as not being an EPBC Act listed bird and bat species; e. provide details of the methodology, data input/output and results of all statistical analyses underlying the monitoring program, including the statistically justified survey effort required across Phase 1 and species-specific annual mortality estimates; f. include a peer-review of the statistical analyses and results of the post-commissioning fatality monitoring program by an independent suitably qualified statistician; and g. include an adaptive management framework that: <ul style="list-style-type: none"> i. incorporates site-specific data collected through the post-commissioning fatality monitoring program; ii. details adaptive avoidance and mitigation measures; iii. includes a table of species-specific trigger levels and corrective actions that will be implemented if those triggers 	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<p>are exceeded, including but not limited to providing environmental offsets in accordance with the Environmental Offsets Policy; and</p> <p>iv. detail a process for the periodic review of the post-commissioning fatality monitoring, impact avoidance and mitigation measures, and corrective actions.</p>		
11D	Following submission of a revised Phase 1 Bird and Bat Management Plan , if the Minister makes a written request to the approval holder to make specified revisions to the Phase 1 Bird and Bat Management Plan , the approval holder must revise the Phase 1 Bird and Bat Management Plan and re-submit the revised Phase 1 Bird and Bat Management Plan to the department in accordance with any such request.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.
12	Revoked.	Not applicable	
12A	<p>In the event any species-specific trigger level for EPBC Act listed threatened bird and bat species specified in the Phase 1 Bird and Bat Management Plan or any BBMP approved by the Minister, is exceeded, the approval holder must:</p> <p>a. notify the department of the exceedance as an incident in accordance with condition 26 of this approval; and</p> <p>b. publish on the website and submit to the department, a report that details the findings of a review of the following by an independent suitably qualified expert over the 12 month period commencing no later than 1 month after the detection of the exceedance:</p> <p>i. the utilisation of the project area by the EPBC Act listed threatened bird and bat species relevant to the exceeded trigger level; and</p> <p>ii. the efficacy and implementation of impact avoidance, mitigation and management measures, and the adaptive management frameworks detailed in all BBMPs approved by the Minister</p>	Not applicable	No species-specific trigger levels for EPBC Act listed threatened bird and bat species specified in the Phase 1 BBMP have been reached or exceeded.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
12B	Each report required under condition 12A of this approval must: <ul style="list-style-type: none"> a. be prepared by an independent suitably qualified expert; b. be published on the website and submitted to the department within 15 months of notifying the department of the relevant species-specific trigger level exceedance; c. remain published on the website until the expiry of this approval; d. include a summary of the review findings; e. list the key recommendations (if any) made by the independent suitably qualified expert to reduce the likelihood of future trigger level exceedance; and f. include a statement made by the approval holder as to which of the recommendations it will accept, and how and by when the approval holder will act on each of the accepted recommendations. 	Not applicable	As noted at Condition 12A above, no species-specific trigger levels have been exceeded.
13	Revoked.	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Offsets			
14	<p>To compensate for the impacts of clearing the approval holder must submit an Offset Strategy for the written approval of the Minister. The action must not commence until the Offset Strategy has been approved by the Minister. If the Minister approves the Offset Strategy then the approved Offset Strategy must be implemented. The Offset Strategy must be prepared by a suitably qualified person in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines. The Offset Strategy must:</p> <ul style="list-style-type: none"> a. Propose an offset package, including potential offset sites, in accordance with the EPBC Act Environmental Offsets Policy, to compensate for the total clearing of the following within each Phase: <ul style="list-style-type: none"> i. Koala habitat; ii. Greater Glider habitat; and 	Compliant	<p>An Offset Strategy (version 2.8, dated 16 December 2020) was prepared and submitted to the Minister for approval.</p> <p>The Offset Strategy was prepared in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines.</p> <p>The Offset Strategy was prepared by suitably qualified persons from NGH Environmental, Green Tape Solutions and Nature Advisory. The persons and their qualifications are documented in Section 1.1.1 of the Offset Strategy.</p> <p>The Minister provided written approval on 23 December 2020, prior to the commencement of the action.</p> <p>The offset strategy:</p> <ul style="list-style-type: none"> a. Contains a proposed offset package, including potential offset sites (Section 3).

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<p>iii. Semi-evergreen Vine Thicket.</p> <p>b. Propose measures for the long term protection and management of offset sites.</p> <p>c. Proposed a timeline and legal mechanism for securing the offset sites to meet the offset requirement in Condition 17; and</p> <p>d. Determine and justify trigger levels for the requirement to provide an offset for significant residual impacts on EPBC Act listed threatened bird and bat species.</p>		<p>b. Proposes measures for the long term protection and management of offset sites (Sections 2.9.1 and 4.1).</p> <p>c. Proposes details of the legal offset mechanism (Section 3.2) and proposes the estimated timeframe for legally securing the offsets (Table 3-3).</p> <p>d. Defines the trigger levels to provide an offset for significant residual impacts on EPBC Act listed threatened bird and bat species (Section 2.11.1).</p>
15	<p>To compensate for the residual significant impacts of the action on Koala habitat, Greater Glider habitat and Semi-evergreen Vine Thicket, the approval holder must submit to the department for the Minister's approval an Offset Management Plan (OMP) for each Phase.</p> <p>Note: The approval holder may submit a combined OMP for Phase 1 and Phase 2 to the department for the Minister's approval.</p>	Compliant	<p>A proposed Offset Management Plan (OMP) was originally submitted to the Minister on 3 March 2023, within 12 months of commencing the action.</p> <p>As reported in Table 5 above, a revised Phase 1 OMP (v2.0) was submitted to the Department on 15 March 2024.</p> <p>On 5 September 2024, EPBC 2018/8141 was varied to reflect the phased delivery of the project across 2 Phases. This included a variation to Condition 15 to enable an OMP to be prepared for each Phase.</p> <p>Subsequently, a revised Phase 1 OMP (v3.2) was submitted to the Department on 31 January 2025, to address comments previously received from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024).</p> <p>As at the end of the reporting period, Minister's approval of the Phase 1 OMP (v3.2) had not yet been received.</p> <p>A Phase 2 OMP has not yet been submitted to the department.</p>
15A	The approval holder must submit the OMP for Phase 1 to the department for the Minister's approval within 12-months of commencement of the action.	Compliant	As noted above, an OMP was submitted to the Department on 3 March 2023 - within 12 months of commencement of the action (7 March 2022).
15B	At the time of submitting an OMP to the department the approval holder must also submit shapefiles and offset attributes for the offset sites relevant to that OMP.	Compliant	The submission of the Phase 1 OMP (v3.2) was accompanied by shapefiles and offset attributes.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
15C	Following submission of an OMP, if the Minister makes a written request to the approval holder to make specified revisions to the OMP, the approval holder must revise the OMP and re-submit the revised OMP to the department in accordance with any such request.	Compliant	A revised OMP (v3.2) was submitted to the Department on 31 January 2025, to address comments from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024). Minister's requests for additional revisions have not been received during the reporting period.
15D	The approval holder must not undertake any clearing in Phase 2 unless and until the Minister has approved the OMP for Phase 2 or a combined OMP for Phase 1 and Phase 2 in writing.	Compliant	As at the end of the reporting period, the approval holder had not undertaken any clearing within Phase 2. Construction of Phase 2 of the Project had not commenced during the reporting period.
15E	Each OMP submitted to the department for the Minister's approval must:		
15E (a)	be prepared by a suitably qualified ecologist ;	Compliant	The Phase 1 OMP (v3.2) has been prepared by suitably qualified ecologists (refer to Section 1.5 of the Phase 1 OMP).
15E (b)	be consistent with the Environmental Management Plan Guidelines and the Offset Strategy approved by the Minister ;	Compliant	The Phase 1 OMP (v3.2) is consistent with the Environmental Management Plan Guidelines (refer to Section 2.3 and Table 5). The Phase 1 OMP (v3.2) is broadly consistent with the Offset Strategy (refer to section 1.4) but is further developed and refined. Necessarily, the offset proposed in OMP v3.2 reflects changes in circumstances since the preparation and approval of the Offset Strategy, including, but not limited to: <ul style="list-style-type: none"> • Impact avoidance measures adopted during construction; • Staged project delivery; • A variation to the conditions of EPBC 2018/8141 in September 2024; • Outcomes of further field investigations; • Selection of the final and most appropriate offset areas secured by the approval holder; • Measures adopted to address comments provided by DCCEEW through their reviews of the document; and • The progression of time since Offset Strategy approval.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
15E (c)	include a summary of the impacts in that Phase that will be compensated for by the offset site(s), including the area and habitat quality of habitats for Koala, Greater Glider and/or Semi-evergreen Vine Thicket cleared in that Phase ;	Compliant	The Phase 1 OMP (v3.2) includes a summary of the final impacts associated with Phase 1 (refer to Sections 1.3 and 3).
15E (d)	include a description and map that clearly define the location and boundaries of the proposed offset site(s) for that Phase ;	Compliant	The Phase 1 OMP (v3.2) includes a description and a map defining the location and boundaries of the Phase 1 Offset Area (refer to Section 4 and Figure 3).
15E (e)	include an assessment (a baseline assessment) of the extent and habitat quality of the habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site(s);	Compliant	The Phase 1 OMP (v3.2) addresses this requirement in Section 5 and Appendix 1.
15E (f)	detail the timing and legal mechanism for securing the offset site(s);	Compliant	The Phase 1 OMP (v3.2) includes details of the legal mechanism (Section 14).
15E (g)	describe the current condition (prior to the proposed management activities) of the offset site(s), including existing vegetation (the baseline condition);	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 4.2 and Table 8.
15E (h)	detail offset completion criteria derived from the habitat quality used to demonstrate achievement of the ecological benefits for each protected matter within the offset site(s) that will be: <ul style="list-style-type: none"> i. achieved in accordance with the timeframes specified in the Offset Strategy approved by the Minister; and ii. maintained or improved for the period of effect of this approval; 	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 13.
15E (i)	describe how habitat availability and connectivity for Koala, Greater Glider and Semi-evergreen Vine Thicket will be improved;	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 4.5.
15E (j)	detail timebound and measurable interim performance criteria, derived from completion criteria, that when achieved demonstrate progress toward achieving completion criteria;	Compliant	The Phase 1 OMP (v3.2) addresses this requirement throughout Section 8 (Management Actions).
15E (k)	detail management measures, including the timeframes and circumstances for implementing those measures to: <ul style="list-style-type: none"> i. achieve interim performance and offset completion criteria; 	Compliant	The Phase 1 OMP (v3.2) addresses these requirements (refer to Section 8 for performance criteria associated with each management actions and refer to Section 13 for completion criteria).

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> ii. ensure no reduction in the extent and habitat quality of the habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site(s) from the baseline assessment; iii. improve habitat availability and connectivity for Koala, Greater Glider and Semi-evergreen Vine Thicket; and iv. protect habitats for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site from direct threats and threatening processes consistent with relevant recovery plans, threat abatement plans and conservation advices; 		
15E (l)	<p>detail the nature, timing and frequency of monitoring to demonstrate:</p> <ul style="list-style-type: none"> i. progress against achieving interim performance and offset completion criteria; ii. the maintenance of completion criteria once achieved; iii. changes to the extent, habitat quality, habitat availability and habitat connectivity within the offset site(s); and iv. demonstrate the efficacy of management measures; 	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Sections 8 and 12.
15E (m)	<p>detail feasible and effective corrective actions, including timeframes and circumstances for implementing those actions, that will be implemented in the event:</p> <ul style="list-style-type: none"> i. the extent or habitat quality of habitats for Koala, Greater Glider and/or Semi-evergreen Vine Thicket decrease(s) from the baseline assessment; and ii. interim performance targets have not been, or are unlikely to be, achieved; 	Compliant	The Phase 1 OMP (v3.2) addresses these requirements within Section 8.
15E (n)	<p>include a risk management strategy that includes:</p> <ul style="list-style-type: none"> i. an assessment of the events or circumstances (risk event(s)) that may prejudice attainment and maintenance of the completion criteria; 	Compliant	The Phase 1 OMP (v3.2) incorporates a detailed risk assessment within Section 10.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> ii. a risk rating for each identified risk event based on the likelihood and consequence of occurrence; iii. measures that will mitigate identified risk events (mitigation measures) by reducing the likelihood and/or consequence of each risk event; iv. the timeframes and circumstances for implementing mitigation measures; v. a rating of the residual risk for each risk event, based on the likelihood and consequence of occurrence, assuming mitigation measures are implemented; 		
15E (o)	include a table comprised of the time-bound management actions, monitoring activities and corrective actions specified in the OMP and a reference to where those actions and activities are detailed in the OMP.	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 8.
16	The approval holder must commence implementing each OMP (the OMP for Phase 1 and the OMP for Phase 2 , or a combined Phase 1 and Phase 2 OMP), as and from when the Minister approves it in writing and continue to implement each OMP until the expiry of this approval.	Not applicable	A revised Phase 1 OMP (v3.2) was submitted to the Minister for approval on 31 January 2025. Minister approval of the Phase 1 OMP (v3.2) had not been received during the reporting period, and therefore the Phase 1 OMP (v3.2) is not yet being implemented.
17	The approval holder must legally secure each offset sites specified in an approved OMP within 2 years of the Minister approving the OMP in which that offset site is specified.	Not applicable	Legal security is outlined in Section 14 of the Phase 1 OMP (v3.2). The Phase 1 OMP (v3.2) has not been approved by the Minister during the reporting period, and therefore the offset sites have not yet been legally secured.
17A	Within 18 months following commissioning of Phase 1 , the approval holder must submit a Bird and Bat Offset Strategy (BBOS) for all Phases to the department for the Minister's approval.	Not applicable	The Bird and Bat Offset Strategy (BBOS) for all Phases is in preparation, and had not yet been submitted to the Minister as at the end of the reporting period <i>Note: 18 months following commissioning of Phase 1 = 5 April 2026.</i>
17B	The BBOS submitted for the Minister's approval must: <ul style="list-style-type: none"> a. propose environmental offsets that will be delivered in the event a species-specific trigger level specified in a BBMP approved by the Minister is met or exceeded; 	Not applicable	The BBOS for all Phases is in preparation and had not yet been submitted to the Minister as at the end of the reporting period.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> b. specify the mechanism and responsible parties for the delivery of each of the proposed environmental offsets; c. demonstrate how each of the proposed environmental offsets are consistent with the Environmental Offsets Policy; d. specify what the outcome of each environmental offset is and the timeframe in which each outcome will be delivered; e. propose feasible and effective contingencies, to be implemented in the event any outcome of an environmental offset is not achieved within the specified timeframe; f. detail the benefit of each proposed environmental offset and its outcome to the conservation of each EPBC Act listed threatened bird and bat species; and g. detail a program to periodically publish on the website and report to the department, information regarding the implementation of each proposed environmental offset. 		
17C	Following submission of the BBOS, if the Minister makes a written request to the approval holder to make specified revisions to the BBOS, the approval holder must revise the BBOS and re-submit the revised BBOS to the department in accordance with any such request.	Not applicable	The BBOS for all Phases is in preparation and had not yet been submitted to the Minister as at the end of the reporting period. As such, no requests have been received.
17D	The approval holder must implement the BBOS approved by the Minister , from within 20 business days of the Minister's approval of the BBOS and until the expiry of this approval.	Not applicable	The BBOS for all Phases is in preparation and had not yet been submitted to the Minister as at the end of the reporting period. As such, the BBOS is not being implemented.
17E	In the event a species-specific trigger level specified in a BBMP approved by the Minister is met or exceeded, the approval holder must achieve the environmental offset outcomes for the respective species in accordance with the timeframes specified in the BBOS approved by the Minister .	Not applicable	The BBOS for all Phases is in preparation and had not yet been submitted to the Minister as at the end of the reporting period.
Notification of date of commencement of the action			
18	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	On 16 March 2022, the approval holder wrote to the Department to provide formal notification that the action commenced on 7 March 2022. The written notification was provided seven (7) business days after the date of commencement of the action.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			On 29 March 2022, the Department provided a letter response which acknowledged receipt of the notification in accordance with Condition 18 of the approval.
19	The approval holder must notify the Department electronically of the date of commissioning in each Phase within 10 business days following the date of commissioning in each Phase	Compliant	Commissioning of Phase 1 commenced on 5 October 2024. Notification of commissioning of Phase 1 was provided to the Department on 16 October 2024, eight (8) business days following the date of commissioning. The Department replied with acknowledgement email on 17 October 2024.
20	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Compliance records			
21	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records .	Compliant	The approval holder maintains accurate and complete compliance records and documents the procedure for recording and storing compliance records.
22	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act , and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.	Compliant	On 2 January 2025, the Department requested the approval holder to provide evidence of the Department being notified of the publication of the 2023-24 ACR dated 4 June 2024. The Department had been notified on the 5 June 2024 and evidence of notification of publication was provided to the Department on the 7 January 2025.
Preparation and publication of plans			
23	The approval holder must:		
23 (a)	Submit plans electronically to the Department for approval by the Minister .	Compliant	The plans have been submitted electronically to the Department for approval by the Minister. The BMP (Condition 4) was submitted electronically, and Ministers approval was received on 12 June 2020. The BMP was revised 10 September 2021 per condition 32, and the Minister was notified per condition 33.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<p>The CTMP (Condition 8) was submitted electronically, and Minister's approval was received on 12 June 2020. The CTMP was revised 8 November 2021 per condition 32, and the Minister was notified per condition 33.</p> <p>The BBMP (Condition 9) was first submitted electronically in December 2020 for approval by the Minister and resubmitted 3 March 2023. The final version was submitted to the Department electronically on 27 August 2024, Ministers approval was received on 6 September 2024.</p> <p>The Offset Strategy (version 2.8), dated 16 December 2020 was submitted electronically to the Minister for approval. The Offset Strategy was approved by the Minister on 23 December 2020.</p> <p>The OMP (Condition 15) was submitted electronically on 3 March 2023 for approval by the Minister. A revised OMP (v3.2) was submitted electronically on 31 January 2025.</p>
23 (b)	Publish each plan on the website within 20 business days of the date the plan is approved by the Minister , or as relevant to the biodiversity management plan , within 20 business days of the date a revised biodiversity management plan is submitted to the Minister , unless otherwise agreed to in writing by the Minister .	Compliant	<p>The BMP (Condition 4), CTMP as an appendix to the BMP (Condition 8), Offset Strategy (Condition 14) and BBMP (condition 9) have been published on the website (within 20 business days of the Minister's approval date).</p> <p>Approval of the OMP, required by Condition 15, has not yet been received.</p>
23 (c)	Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public.	Compliant	Sensitive ecological data has not been included on the plans published on the website.
23 (d)	Keep plans published on the website until the end date of this approval.	Compliant	The approved plans continue to remain published on the website.
24	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan or conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan .	Compliant	Where required by a Plan, data has been submitted electronically to the Department in accordance with the requirements of the Plan.
Annual compliance reporting			

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
25	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period) .	Compliant	A compliance report was prepared for the 12-month ACR period, being 7 March 2023 to 6 March 2024.
25A	The approval holder must include the following information in all compliance reports prepared for each ACR period following commissioning :	Compliant	It is noted that: <ul style="list-style-type: none"> commissioning commenced on 5 October 2024; no EPBC Act listed threatened bird and bat species were detected during the reporting period; no mortality thresholds were reached or exceeded during the reporting period (refer section 5.4 of the BBMP); the project is still undergoing commissioning and has not yet commenced implementation of the full carcass search program (refer section 4.4.4 of the BBMP); no BBMP annual monitoring reports have been prepared, as the project has not completed the first year of full carcass search program implementation (refer section 9.1.1 of the BBMP).
25A (a)	a count of all turbine strikes detected for EPBC Act listed bird and bat species in the project area and in each Phase , during the ACR period , and a compilation and analyses of information in relation to each turbine strike regarding: <ol style="list-style-type: none"> the method of detection; the species detected; prevailing environmental/meteorological conditions at the estimated time of the collision; and likely factors in the presence of the EPBC Act listed bird and bat species and EPBC Act listed migratory bird or bat species leading to the collision. 	Not applicable	Zero (0) turbine strikes were detected for EPBC Act listed bird or bat species during this ACR period ending 6 March 2025.
25A (b)	estimations of annual mortality and injury rates for each EPBC Act listed threatened bird and bat species , calculated in accordance with the BBMP(s) for each Phase approved by the Minister .	Not applicable	No estimations of annual mortality were required to be undertaken during the ACR period ending 6 March 2025, in accordance with the Phase 1 BBMP. It is noted that:

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<ul style="list-style-type: none"> no EPBC Act listed threatened bird and bat species were detected during the reporting period; no mortality thresholds were reached or exceeded during the reporting period; the project has not commenced implementation of the full carcass search program (refer section 4.4.4 of the BBMP); no BBMP annual monitoring reports have been prepared, as the project has not commenced or completed the first year of full carcass search program implementation (refer section 9.1.1 of the BBMP).
25A (c)	species occurrence records in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing; and	Not applicable	No EPBC Act listed threatened bird or bat species were detected during the reporting period.
25A (d)	an evaluation of effectiveness of the measures implemented during the reporting period to avoid and mitigate mortality and/or injury to EPBC Act listed threatened bird and bat species .	Compliant	Appendix C contains a review of the effectiveness of the BBMP during the reporting period, to avoid and mitigate mortality and/or injury to EPBC Act listed threatened bird and bat species.
25B	<p>The approval holder must ensure each compliance report includes:</p> <ol style="list-style-type: none"> accurate and complete details of compliance and any non-compliance with: <ol style="list-style-type: none"> each condition attached to this approval decision, and all commitments made in each plan a schedule of all plans in effect in relation to these conditions during the ACR period accurate and complete details of how each plan was implemented during the ACR period, and if any incident occurred, accurate and complete details of each incident 	Compliant	<p>This Annual Compliance Report covers the ACR period 7 March 2024 to 6 March 2025.</p> <p>Details of non-compliance with conditions attached to approval EPBC 2018/8141 or commitments in plans is included within Tables 5 & 6 and summarised in Section 5 of this Annual Compliance Report.</p> <p>During the reporting period, there has been one (1) non-compliance with a commitment made in the BMP. Details are provided against Condition 4 of Table 5.</p> <p>Appendix A contains a schedule of all plans in effect during the ACR period.</p> <p>Appendix B provides a review of the effectiveness of the BMP implementation during the reporting period.</p> <p>Appendix C provides a review of the effectiveness of the BBMP implementation during the reporting period.</p>

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			No incidents were recorded during the ACR period ending 6 March 2025.
25C	The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	<p>The 2024 compliance report was consistent with the Annual Compliance Report Guidelines.</p> <p>This compliance report, covering the period 7 March 2024 – 6 March 2025, has been prepared in accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.</p>
25D	The approval holder must, within 20 business days following the end of each ACR period , in a format that is easily accessible and downloadable, publish on the website :	Not applicable	<p>The previous compliance report was submitted on 4 June 2024, prior to the variation of the EPBC Approval 2018/8141 and in accordance with the requirements of Condition 25 in effect at the time. Refer to the details of compliance provided at Condition 25, Table 5.</p> <p>This current compliance report will be published on the website within 20 business days of the end of the ACR period (ending 6 March 2025).</p>
25D (a)	each compliance report ; and		<p>This and all previous compliance reports are published on the project's website:</p> <p>https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm</p>
25D (b)	a shapefile showing all clearing of protected matters , and their habitat, undertaken within the ACR period .	Compliant	<p>A zipped shapefile (.zip) is available on the project's website which shows the clearing of protected matters within Phase 1 of the project.</p> <p>The shapefile is inclusive of the clearing undertaken during this ACR period ending 6 March 2025.</p> <p>https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm</p>
25E	The approval holder must:		
25E (a)	Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public.	Not applicable	Sensitive ecological data has not been included in the annual compliance report, which was published on the website on 4 June 2024.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
25E (b)	If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	Sensitive ecological data has not been included in the previous annual compliance report, which was published on the website on 4 June 2024.
25E (c)	If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	Sensitive ecological data has not been included in the previous annual compliance report, which was published on the website on 4 June 2024.
25F	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website . In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website .	Compliant	On 5 June 2024, the Department was notified by email that the previous compliance report had been published on the website. The email notification was made to the Department 1 business days following publication of the report on the website.
25G	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report is published and until the expiry date of this approval. Note: Compliance reports may be published on the department's website.	Compliant	The previous compliance reports continue to remain published on the website: https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm
Reporting non-compliance			
26	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident , or potential or actual non-compliance with these conditions or commitments made in a plan . The approval holder must specify in each notification: a. any condition or commitment made in a plan which has not been or may have been not complied with;	Compliant	Two non-compliance notifications were made in accordance with Condition 26 during the reporting period and prior to the variation to the EPBC Approval 2018/8141. Therefore, details of the two non-compliance notifications have been documented against Condition 26 of Table 5. No further non-compliances were recorded or notified during the remainder of the ACR period (between 5 September – 6 March).

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> b. a short description of the incident or non-compliance; and c. the location (if applicable, including co-ordinates), date and time of the incident or non-compliance. 		
27	<p>The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, or potential or actual non-compliance with these conditions or commitments made in a plan, the details of that incident or non-compliance. The approval holder must specify:</p> <ul style="list-style-type: none"> a. all corrective measures and investigations which the approval holder has already taken in respect of the incident or non-compliance; b. the potential impacts of the incident or non-compliance; c. the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident or non-compliance; and d. any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident or non-compliance, and/or to address its consequences. 	Compliant	<p>As noted above against Condition 26, two non-compliances were notified to the Department during the reporting period and prior to the variation to the EPBC Approval 2018/8141 (on 5 September 2024). Therefore, the details of the two non-compliances have been documented against Condition 27 of Table 5.</p> <p>No further non-compliances were recorded or notified during the remainder of the ACR period (between 5 September – 6 March).</p>
Independent audit			
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period .	Not applicable	<p>The audit period is defined in EPBC 2018/8141 as: means each 5-year period following the commencement of the action until the expiry of this approval, unless otherwise specified in writing by the Minister.</p> <p>Accordingly, the first audit period covers the period 7 March 2022 – 6 March 2027.</p>
29	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
30A	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30B	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period , or as otherwise directed by the Minister in writing.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30C	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30D	The approval holder must publish each audit report on the website , in a format that is easily accessible and downloadable, within 10 business days of the date of the department agrees to the audit report in writing.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30E	The approval holder must notify the department within 5 business days of the date the audit report is published on the website . In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
30F	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2025.
Revision of action management plans			
31	The approval holder may, at any time, apply to the Minister for a variation to a plan by the Minister as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act .	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
32	The approval holder may choose to revise the Biodiversity Management Plan , without submitting it for approval under section 143A of the EPBC Act , if the taking of the action in accordance with	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	the revised Biodiversity Management Plan would not be likely to have a new or increased impact .		
33	If the approval holder makes the choice under condition 32 to revise the Biodiversity Management Plan without submitting it for approval, the approval holder must:	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
33 (a)	<p>notify the Department in writing that the Biodiversity Management Plan has been revised and provide the Department with:</p> <ul style="list-style-type: none"> i. an electronic copy of the revised Biodiversity Management Plan; ii. an electronic copy of the revised Biodiversity Management Plan marked up with track changes to show the differences between the current Biodiversity Management Plan and the revised Biodiversity Management Plan; iii. an explanation of the differences between current Biodiversity Management Plan and the revised Biodiversity Management Plan; iv. the reasons the approval holder considers that taking the action in accordance with the revised Biodiversity Management Plan would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the revised Biodiversity Management Plan, being at least 20 business days after the date of providing notice of the revision of the Biodiversity Management Plan, or a date agreed to in writing with the Department. 	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
33 (b)	Subject to condition 35, implement the revised Biodiversity Management Plan from the implementation date.	Compliant	No approved action management plans were revised in accordance with this condition, during the reporting period.
34	The approval holder may revoke its choice to implement a revised Biodiversity Management Plan under condition 32 at any time by giving written notice to the department . If the approval holder revokes	Not applicable	The approval holder has not revoked a RAMP.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	the choice under condition 32, the approval holder must implement the previous version of the Biodiversity Management Plan .		
35	<p>If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised Biodiversity Management Plan would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none"> a. condition 32 does not apply, or ceases to apply, in relation to the revised Biodiversity Management Plan; and b. the approval holder must implement the version of the Biodiversity Management Plan specified by the Minister in the notice. 	Not applicable	No notice was received during the reporting period.
36	<p>At the time of giving the notice under condition 35, the Minister may also notify that for a specified period of time, condition 32 does not apply.</p> <p>Note: conditions 32, 33, 34 and 35 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval</p>	Not applicable	No notice was received during the reporting period.
Completion of the action			
37	Within 20 business days after the completion of the action , and, in any event, at least 20 business days before this approval expires, the approval holder must notify the department electronically of the date of completion of the action and provide completion data . The approval holder must submit any spatial data that comprises completion data as a shapefile .	Not applicable	The action is not yet completed.
38	<p>The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.</p> <p>Note: Section 145C of the EPBC Act entitles the approval holder to request an extension to the period of effect of this approval.</p>	Not applicable	The action is not yet completed.

4 New environmental risks

One new risk has been identified during the reporting period, as detailed below.

New Risk – Risk of delay to active management of the Phase 1 offset area

As noted in Table 3 (Condition 15), a revised Phase 1 OMP (v3.2) was submitted to the Department on 31 January 2025, to address comments previously received from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024).

No feedback had been received from the Department as at the end of the ACR period, or as at the date of this report (3 April 2025).

The approval holder is committed to undertaking the offset area management actions as set out in the OMP (v3.2). However, until the Minister has approved the OMP, the approval holder cannot progress with the implement the suite of management actions as set out in the OMP (v3.2).

5 Conclusion

A total of 3 non-compliances have been recorded within **Table 5** of this Annual Compliance Report:

- **Condition 14 – Offset Strategy** – The approval holder did not submit and have approved, an Offset Management Plan within 12 months of commencement of the Action, as required by the approved Offset Strategy (v2.8).
- **Condition 15 – Offset Management Plan** – The approval holder did not have the Offset Management Plan approved within 12 months of the commencement of the Action, as required by Condition 15 (as written, prior to the variation of the condition on 5 September 2024).
- **Condition 17 – Legal securement of the offset sites** – The approval holder did not have the offset sites legally secured within 2 years of the commencement of the action, as was required by Condition 17 (as written, prior to variation of the condition on 5 September 2024).

Following the Directed Variation to EPBC Approval 2018/8141 in September 2024, compliance with these conditions was restored, as reflected against [Condition 14](#), [Condition 15](#) and [Condition 17](#) of **Table 6**.

Several of the conditions were 'not applicable' during the reporting period, due to the following factors:

- Phase 2 of the Project has not commenced construction.
- A BBMP for Phase 2 has not yet been submitted to the Minister for approval.
- No turbine strikes of EPBC Act listed threatened bird or bat species were detected.
- The Project (and the Action) is not completed.

Appendix A Schedule of Plans

Table 7: Schedule of Plans in effect during ACR period (7 March 2024 – 6 March 2025).

CoA	Plan	Approval status	Implementation status
4	Biodiversity Management Plan (v3.4)	The BMP was approved by the Minister on 12 June 2020. The latest version being Clarke Creek Wind Farm – Biodiversity Management Plan, Revision 3.4, dated 10 September 2021 (updated per condition 32 of EPBC 2018- 8141 and the Minister was notified per condition 33).	The BMP was implemented during the reporting period. Specialist consultants NGH Environmental and CGQ has been engaged to undertake the Pre-clearance surveys, and monitoring clearing activities, as outlined in Section 5.3, 5.4 and 6 of the BMP Refer to Appendix B for details of plan implementation and effectiveness during the reporting period.
8	Cycad Translocation Management Plan (v5) (BMP, Appendix G)	The CTMP is Appendix G of the BMP, Revision 3.4, dated 10 September 2021 The CTMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Cycad Translocation and Management Plan, Revision V5, dated 8 November 2021 (updated per condition 32 of EPBC 2018-8141 and the Minister was notified per condition 33).	The Phase 1 area was surveyed in March 2021 with no EPBC-listed cycads identified (<i>C. megacarpa</i> or <i>C. ophiolitica</i>). As such the implementation of the CTMP where it relates to EPBC Listed Cycads species is not relevant for Phase 1 of the Project as no impacts to EPBC listed cycads has occurred.
9	Threatened Bird and Bat Management Plan	The BBMP was approved by the Minister on 5 September 2024. The latest version being Clarke Creek Wind Farm – Phase 1 Bird and Bat Management Plan, Report 17047(4.16), dated 27 August 2024.	Implementation of the BBMP commenced upon approval in 2024. A specialist consultants (Umwelt, supported by EcoK9) has been engaged to conduct the monitoring activities and prepare the reports in accordance with the methodology outlined in Section 4 and 9 of the BBMP. Refer to Appendix C for details of plan implementation and effectiveness during the reporting period.
14	Offset Strategy (v2.8)	The Offset Strategy was approved by the Minister on 23 December 2020. The latest version being Clarke Creek Wind Farm – Offset Strategy, revision 2.8, dated 16 December 2020.	The Offset Strategy was implemented during the reporting period. Specifically, the Offset Management Plan v3.2 has been prepared in accordance with the requirements of the Offset Strategy and has been submitted to the Department for Minister's approval.
15	Phase 1 Offset Management Plan (in preparation)	The Phase 1 OMP was in preparation during the reporting period. The revised Phase 1 OMP (v3.2) was submitted to the Minister for approval on 31 January 2025. The OMP (v3.2) was prepared to address comments from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024).	Minister approval of the Phase 1 OMP (v3.2) had not been received during the reporting period, and therefore the Phase 1 OMP (v3.2) is not yet being implemented.

Appendix B Review of BMP Performance Criteria and Plan Effectiveness

Table 8: Review of the BMP performance indicators and plan effectiveness.

Objectives	Performance indicators	Comment	Review of Effectiveness
No net loss of threatened Cycad individuals.	Threatened Cycads within the disturbance footprint are successfully translocated or propagated (refer to Cycad Translocation Management Plan).	<p>Section 2.1 of the CTMP outlines that a survey conducted in March 2021 did not identify any EPBC-listed Cycads within the Project footprint cleared to date.</p> <p>All cycads encountered to date have been identified as <i>C. terryana</i>, which is not an EPBC-listed species (<i>C. megacarpa</i> or <i>C. ophiolitica</i> and thus outside the remit of the EPBC Act approval (relevant to the Queensland Department of Environment Science and Innovation protected plants approval).</p> <p>As such, the implementation of the CTMP where it relates to EPBC Listed Cycads species is not relevant for Phase 1 of the Project as no impacts to EPBC listed cycads has occurred.</p>	BMP and CTMP mitigation and management measures have been effective during the reporting period.
Improve the condition and management of retained SEVT vegetation in the Project Area.	<p>Loss of SEVT will be minimised, with no more than the approved vegetation clearing amount:</p> <ul style="list-style-type: none"> 45.22 ha of SEVT (EPBC-listed) <p>Condition of the SEVT will be improved by implementing fire and pest animal management, as well as by providing a SEVT offset in accordance with the offset strategy and management plan for the Project.</p>	Following additional detailed assessments of the vegetation on site, the EPBC-listed Semi-evergreen Vine Thicket was not confirmed on site for Stages 1 & 2. Consequently, no direct offset solution is proposed for this Matter of National Environmental Significance (MNES).	BMP mitigation and management measures have been effective during the reporting period.
Retain viable native vegetation communities in the Project Area. Riparian vegetation is retained and restored.	No more than the approved vegetation clearing (State approval)	<p>Clearing has not exceeded the approved clearing limits specified in EPBC Approval 2018/8141.</p> <p>As detailed in this compliance report (Table 6, Condition 3), the clearing totals for Phase 1 of the project as of March 2025 are:</p> <ul style="list-style-type: none"> Koala Habitat: 409.71 ha (Clearing limit for project = 1,513 ha) 	Clearing mitigation and management measures have been effective during the reporting period.

Objectives	Performance indicators	Comment	Review of Effectiveness
		<ul style="list-style-type: none"> • Greater Glider habitat: 1.95 ha (Clearing limit for project = 17.83 ha) • Squirrel Glider Habitat: 1.95 ha (Clearing limit for project = 17.83 ha) • SEVT: 0 ha. (Clearing limit for project = 45.22 ha) <p>Clearing has not exceeded the clearing limits specified in the State Development Approval.</p>	
To protect EPBC Act threatened fauna species (including Koala, Greater Glider, White-throated Needle-tail, Squatter Pigeon, and Red Goshawk) and EPBC Act threatened bird and bat species (including White-throated Needle-tail, Rainbow Bee-eater, Rufous Fantail, Fork-tailed Swift, Satin Flycatcher, Red Goshawk and Corben's Long-eared Bat).	<p>No mortality or injury to EPBC (or NC) Act threatened species as a direct result of the Project.</p> <p>Alternative habitat provided for Greater Glider and in use by this species.</p>	<p>There has been no mortality or injury to EPBC Act listed threatened species as a direct result of the project.</p> <p>The approved BBMP contains measures to protect EPBC Act listed Bird and Bat species.</p> <p>There have been no signs of active hollow use by Greater Glider, and therefore no alternative habitat was required to be provided for this species.</p> <p>Clearance of Greater Glider habitat areas has been minimised.</p>	BMP mitigation and management measures have been effective during the reporting period.
Successful rehabilitation of disturbed ground.	Areas of disturbed ground no longer required for operations will have at least 70% groundcover, in consideration of the local environmental conditions.	<p>Progressive rehabilitation of disturbed areas has been undertaken across the site as the works have been completed. Stabilisation measures have included:</p> <ul style="list-style-type: none"> • Temporary stabilisation, using soil binders / tackifiers. • Placement of geofabric and rock rip-rap stabilisation where required to control erosion (eg in areas of concentrated surface water flow). 	BMP mitigation and management measures have been effective during the reporting period.

Objectives	Performance indicators	Comment	Review of Effectiveness
		<ul style="list-style-type: none"> Placement of stockpiled cleared vegetative materials to provide immediate erosion and sediment control. Application of hydroseeding / hydromulching / hand seeding – for vegetation establishment. <p>Bonded fibre matrix (BFM) has been widely used on areas such as road and hardstand batters to achieve revegetation. BFM offers immediate ground cover, stabilisation, a growth medium for seed germination, and also aids with weed suppression.</p> <p>Biochar has also been widely used as an effective rehabilitation and revegetation measure. Biochar supports improved seed establishment and long-term soil regeneration, increased moisture holding capacities (drought tolerance), nutrient retention, microbial health, and soil amelioration.</p>	
Bushfire risk will not increase as a result of the Project.	Activities associated with the Project will not cause a bushfire.	Activities undertaken during the project have not caused a bushfire during the reporting period.	BMP mitigation and management measures have been effective during the reporting period.
Pest animal activity will not increase as a result of the Project.	Pest animal presence is at the same (or reduced) level as during pre-construction surveys.	Pest animal presence is at the same or reduced level as during pre-construction surveys. There have been infrequent sightings of pest animal species on the project. Construction activities have likely deterred pest species from the area due to the frequency of activity.	BMP mitigation and management measures have been effective during the reporting period.
No new restricted weed species introduced as a result of the Project. No new outbreaks of restricted weeds within the Project Area.	Weed species diversity and location of infestations is at the same (or reduced level) as during pre-construction surveys.	<p>Within the project footprint, weed species diversity and extent of infestation is at the same or reduced level as during pre-construction surveys.</p> <p>Weed management on the wind farm site has included:</p> <ul style="list-style-type: none"> Mechanical removal and disposal of weeds during pre-clearing and clearing activities. Ongoing weed monitoring during construction activities. 	BMP mitigation and management measures have been effective during the reporting period.

Objectives	Performance indicators	Comment	Review of Effectiveness
		<ul style="list-style-type: none"> Follow-up weed control where required (eg. further hand or mechanical removal, spot spraying with herbicide). 	
		Monitoring and control of weeds will continue.	
Protected fauna will not be killed or injured as a result of the Project.	No mortality or injury to protected native fauna as a direct result of the Project.	No EPBC Act protected fauna were killed or injured as a result of the project during the reporting period.	BMP mitigation and management measures have been effective during the reporting period.
Biodiversity performance monitored and reported on.	Annual compliance report prepared for each 12- month period from construction commencement, published on the Project website within 60 business days of the relevant 12-month period.	<p>The previous annual compliance report (ACR) was prepared and published on the project website within 60 business days of the reporting period.</p> <p>The current ACR will be published on the project website within 20 business days of the end of the ACR period.</p>	BMP mitigation and management measures have been effective during the reporting period.

Appendix C Review of BBMP Objectives, Commitments and Plan Effectiveness

Table 9 sets out the objectives and commitments outlined in Section 1.4 of the approved BBMP and provides a review of the effectiveness against each commitment.

No EPBC Act listed threatened bird or bat species were detected during the reporting period. As a result, no mortalities or injuries have been recorded to date.

In accordance with the approved BBMP, the full carcass search program (per section 4.4.4 of the approved BBMP) is not expected to commence until Q3 or Q4 of 2025, once all turbines are commissioned and Phase 1 of the wind farm is fully operational.

Table 9: Review of effectiveness of the Bird and Bat Management Plan commitments to achieve objectives

Objective	Commitment	Comment / Review of Effectiveness
Ensure the protection of EPBC Act listed threatened bird and bat species.	This will be achieved through the actions listed below in this table.	<p>No EPBC listed threatened bird or bat species were detected during the reporting period.</p> <p>No mortalities or injuries to EPBC Act listed threatened bird or bat species were detected during the reporting period.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>
To implement a monitoring program to estimate the impact of the Project on the seven at-risk birds and/or bats that can reasonably be attributed to the operation of the Project.	Carcass monitoring will be implemented in accordance with the carcass monitoring program outlined in this plan.	<p>Carcass monitoring has been implemented during the reporting period in accordance with the carcass monitoring program outlined in the BBMP, as relevant to the status of commissioning and operation of the project.</p> <p>This has included:</p> <ul style="list-style-type: none"> • Incidental carcass monitoring and reporting • Preliminary interim carcass searches commenced during the reporting period, even though the requirement to commence these searches had not been formally triggered during the reporting period (as no turbines had passed their reliability tests – refer to Section 4.4.3 of the BBMP).
To directly record impacts on birds and bats through a statistically-based program of carcass searches.	The carcass monitoring program has been designed to be used in accordance with the statistical analysis outlined in Appendix	As noted above, carcass monitoring has been implemented during the reporting period in accordance with the carcass monitoring program outlined in the BBMP (Section 4.4), as relevant to the status of commissioning and operation of the project.

Objective	Commitment	Comment / Review of Effectiveness
	2 to estimate annual mortality rates for birds and bats of this wind farm.	The full carcass search program is not expected to commence until Q3 or Q4 of 2025, once all turbines are commissioned and Phase 1 of the wind farm is fully operational (per section 4.4.4 of the approved BBMP).
To document a decision-making framework that identifies impact triggers requiring a management response.	Impact triggers have been defined for both threatened and non-threatened species, along with a decision-making framework.	Section 5.3.1 of the approved BBMP contains a decision-making framework for threatened species impact triggers. There were no impact triggers recorded during the reporting period, and as such the decision making framework was not required to be implemented.
To detail mitigation measures and related management strategies to be implemented in response to impact triggers occurring.	Mitigation and management measures have been defined as ongoing management actions and in response to impact triggers.	<p>Section 3 of the approved BBMP contains environmental management and mitigation measures.</p> <p>Section 5 of the approved BBMP contains mitigation measures to be implemented in response to impact triggers. No impact triggers occurred during the reporting period.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>
To identify matters to be addressed in periodic reports on the outcomes of monitoring, the application of the decision-making framework, mitigation measures implemented and their success.	Annual reports will be prepared and provided to DESI and DCCEEW. In case of incidents, an incident notification and a report of corrective actions and mitigation measures will be prepared.	<p>In accordance with Section 9 of the approved BBMP, the first annual report will be prepared and submitted to DESI and DCCEEW within three months of the completion of the first year of full carcass search implementation after Phase 1 of the project becomes fully operational.</p> <p>As the first year of full carcass search monitoring has not been completed, annual reporting has not yet been undertaken.</p> <p>This Table presents a review of the effectiveness of the BBMP commitments implemented during the ACR period ending 6 March 2025.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

