



CRUDINE RIDGE WIND FARM

Environmental Management Strategy

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Version 11

Author CWP Renewables

Client Crudine Ridge Wind Farm Pty Ltd

Crudine Ridge Wind Farm, Mudgee, New South Wales



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Key Terms

Table 1 Key Terms

Term	Definition
AHMP	Aboriginal Heritage Management Plan
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	NSW Biodiversity Conservation Act 2017
BCS	NSW Biodiversity, Conservation and Science Directorate
BRC	Bathurst Regional Council
BMP	Biodiversity Management Plan
BGW	Box Gum Woodland
CCC	Community Consultative Committee
CFP	Chance Finds Protocol
Council	Mid-Western Regional Council or Bathurst Regional Council
CRWF	Crudine Ridge Wind Farm
CWP	CWP Renewables Pty Ltd
DAWE	Department of Agriculture, Water and the Environment (now DCCEEW)
DCCEEW	Department of Climate Change, Energy, the Environmental and Water
DECC	Department of Environment and Climate Change (now DPE)
Development Application	Refer to the definition of EA (below), the Development Application was formed by those component parts
Development Consent	SSD-6697 as modified by: <ul style="list-style-type: none"> • Modification 1 – June 2019; • Modification 2 – May 2020; and • Modification 3 – September 2020.
Development Footprint	The area of physical disturbance associated with the construction of the Project, comprised of temporary impacts and permanent impacts.
DoEE	Commonwealth Department of the Environment and Energy (now DCCEEW)
DPE	NSW Department of Planning and Environment
EA	Environmental Assessment, and consistent with the definitions in the Consent Conditions, the EA incorporates: The environmental assessment for the Crudine Ridge Wind Farm, prepared by CWP and dated December 2012, as modified by: <ul style="list-style-type: none"> • Crudine Ridge Response to Submissions and Preferred Project Report, prepared by CWP and dated November 2013; • The supplementary visual wireframe analysis and wind turbine layout plans prepared by CWP and dated 12 December 2014; and • The documents submitted in support of the first application to modify the consent, including the Environmental Assessment dated December 2018, the Response to

	<p>Submissions dated January 2019 and the Supplementary Information dated February 2019; and</p> <ul style="list-style-type: none"> • The documents submitted in support of the second application to modify the consent, including the Environmental Assessment dated April 2020 and the additional information dated May 2020; and • The documents submitted in support of the third application to modify the consent, including the Modification Report dated August 2020.
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
EPBC Approval	<p>EPBC 2011/2606 as varied by:</p> <ul style="list-style-type: none"> • Original approval – 4/4/2017 • Variation – 2/11/2021
EPC	Engineering Procurement and Construction contractor; also refers to any other principal contracting entity engaged on the Project, such as TransGrid
EPL	Environment Protection Licence
ERP	Emergency Response Plan
AHMP	Aboriginal Heritage Management Plan
LGA	Local Government Area
MWRC	Mid-Western Regional Council
OEH	Office of Environment and Heritage (now BCS)
OEMP	Operations Environmental Management Plan
Project Site	The land defined in Appendix 1 of the Development Consent
Proponent	Crudine Ridge Wind Farm Pty Ltd
RMP	Risk Management Plan
TfNSW	Transport for NSW
TEC	Threatened Ecological Community
The Minister	Minister for Agriculture, Water and the Environment and Energy (Commonwealth)
The Project	Crudine Ridge Wind Farm
The Secretary	Secretary of Department of Planning and Environment (NSW)
WTG	Wind Turbine Generator

1 Introduction

1.1 Project Description

Crudine Ridge Wind Farm (the Project) is an approved wind farm project located near Pyramul, NSW, approximately 45km south of Mudgee and 45km north of Bathurst. The Project consists of up to 37 wind turbines each with a maximum height of 160m from foundation to the blade tip. The Project also comprises access roads, internal electrical reticulation, a substation, an operations and maintenance (O&M) facility and approximately 15 km of overhead transmission line. A map of the Project is provided in Figure 1.

The Project has a generation capacity of approximately 141 MW and connects to the existing 132kV TransGrid transmission line oriented north-south approximately 16 km east of the substation site. The Project has been constructed primarily on freehold land, as well as Crown and Council land across two Local Government Areas (LGAs) Mid-western Regional Council (MWRC) and Bathurst City Council (BCC). The land has been secured under lease and license arrangements. The Project is operated by Crudine Ridge Wind Farm Pty Ltd (CRWF) with transmission infrastructure owned and operated by the network service provider (TransGrid).

The Project was granted state significant development approval (SSD-6697) by the NSW Land and Environment Court under the *Environmental Planning and Assessment Act 1979 (EP&A Act)* in May 2016. This approval was modified in June 2019, May 2020, and September 2020. Controlled Action approval (EPBC 2011/6206) was granted by the Minister for the Environment under the *Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)* in April 2017.

1.2 Project Activities

Construction of CRWF commenced in May 2018. Operation of several turbines commenced in mid-2021 with the remaining turbines in various stages of commissioning and operation throughout 2021. Operations of all turbines formally commenced on 20 December 2021. GE Renewable Energy Australia (GE) is contracted under a Full Services Agreement (FSA) by CRWF to operate and maintain the wind turbines. The wind farm operates from the O&M facility. Except when major repairs are being undertaken, site maintenance activity is generally undertaken by light vehicles and delivery trucks for spare parts. Where major repairs are required, equipment such as large cranes and trucks may be utilised.

TransGrid own and manage the Substation. Operation of the Substation is undertaken remotely by TransGrid or locally from the control room in the Substation as required. As such the environmental management and compliance requirements of the Substation is entirely outside the remit of CRWF.

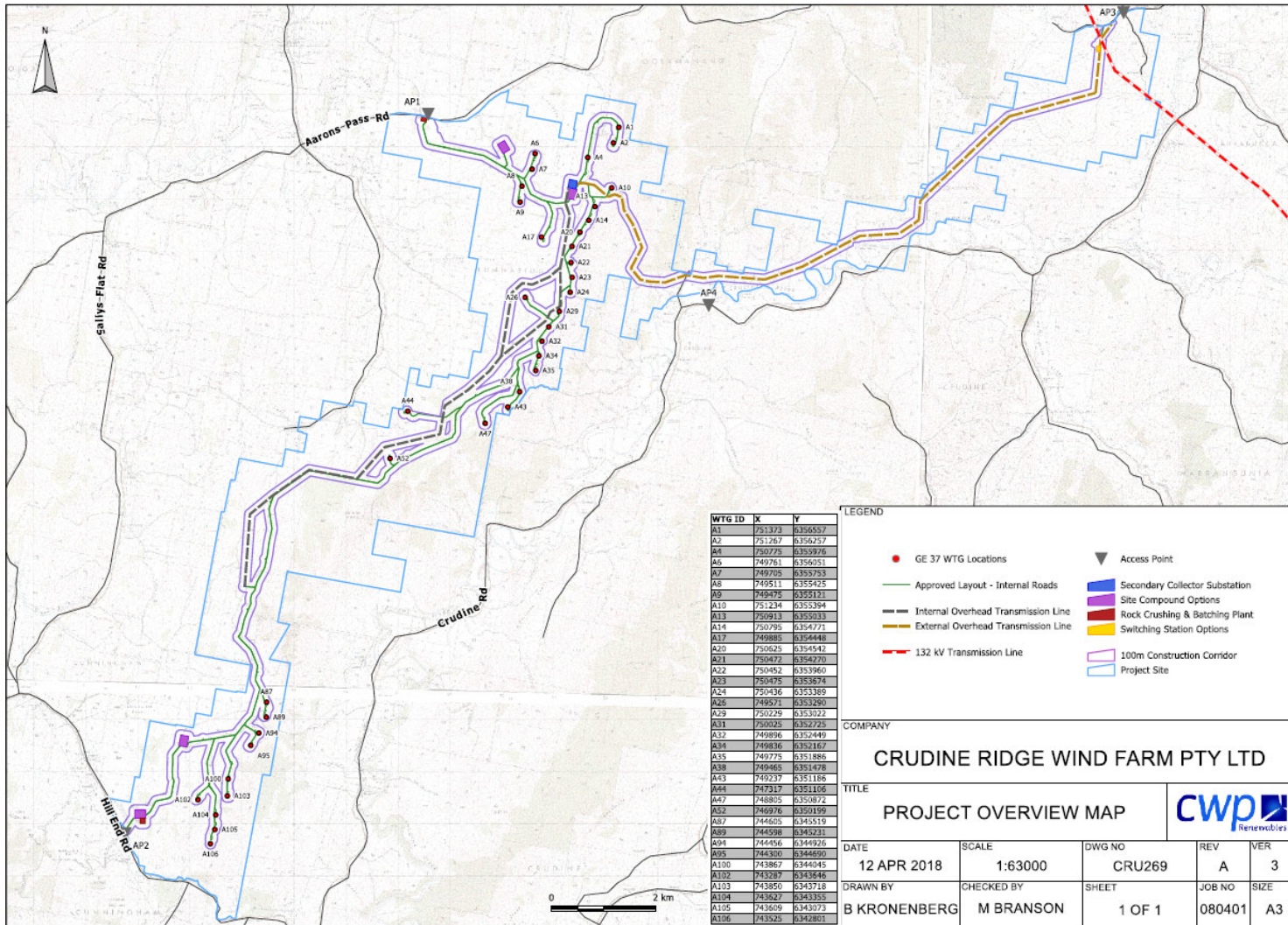


Figure 1 Final Layout Plan

1.3 Purpose and Scope of this Plan

Pursuant to Schedule 2 Condition 9 of the NSW Development Consent, the department was notified that the operation stage of the project commenced on 21 December 2021. Department Approval was received on 22 December 2021 (Appendix D). As such, this Environmental Management Strategy (EMS) provides the framework for environmental management during the operation stage of the Project. The EMS guides compliance with the Development Consent (SSD-6697) and other relevant requirements – see Section 2. This EMS is based on the mitigation measures included in the Project Environmental Assessment (EA). The EMS considers *ISO 14001:2015 Environmental Management Systems – Requirements and Guidance for Use*.

This EMS has been prepared for the Project to:

- Satisfy the requirements of the Development Consent, Commonwealth approvals and all relevant legislation (Section 2)
- Provide a management framework that aims to control potential impacts on the environment and community during operation of the wind farm
- Outline the statutory approvals and compliance obligations that apply to the Project during operation
- Equip all Project staff and contractors with the appropriate training, equipment and delegations to implement their environmental obligations under this EMS
- Provide mechanisms to identify and manage environmental impacts arising from changes to operation

The EMS provides the framework for associated management plans required for the Project including:

- Bird and Bat Adaptive Management Plan (BBAMP)
- Aboriginal Heritage Management Plan (AHMP)
- Biodiversity Management Plan (BMP)
- Traffic Management Plan (TMP)
- Pollution Incident Response Management Plan (PIRMP)

2 Statutory Approvals and Legislation

2.1 Overview of Statutory Approvals

To ensure compliance with the applicable statutory approvals, the Project Environmental Officer maintains a Compliance Register that will be readily accessible by all staff and contractors. The Compliance Register includes requirements from the following approval related documentation:

- The Project Development Application (Environmental Assessment (EA))
- Response to Submissions Report
- Development Consent SSD-6697
- Commonwealth EPBC Act Approval 2011/6206
- Environment Protection Licence 21090.

2.2 Development Application (EA)

In the various application documents, the Proponent made commitments to environmental management. This includes the EA, Statement of Commitments and Response to Submissions.

2.3 NSW Development Consent

The consent conditions relevant to this EMS and the location at which each of the sub-conditions are addressed are detailed in Table 2 below. All conditions from the consent are incorporated into the CRWF Compliance Register.

Table 2 NSW Development Consent Commitments

SSD-6697 Approval	NSW Development Consent	Location addressed
Schedule 2 Condition 1	In addition to meeting the specific environmental performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the development.	This EMS and supporting management plans referenced in this EMS
Schedule 2 Condition 9	Prior to the commencement of the construction, operation and/or decommissioning of the development, the Applicant shall notify the Department in writing of the date of commencement. If the construction, operation and/or decommissioning of the development is to be staged, then the Applicant must: (a) notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage; and (b) inform the local community and the Community Consultation Committee about the proposed staging plans.	Section 7.2, Table 8

Schedule 2 Condition 13	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant shall:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	Section 3.3 and Section 7
Schedule 2 Condition 14	<p>The Applicant shall ensure that all plant and equipment used on site, or in connection with the development, is:</p> <p>(a) maintained in a proper and efficient condition; and</p> <p>(b) operated in a proper and efficient manner</p>	Section 3.3
Schedule 2 Condition 16	<p>Prior to the commencement of construction, unless the Secretary agrees otherwise, the Applicant shall enter into VPAs with the Councils in accordance with:</p> <p>a) Division 6 of Part 4 of the EP&A Act; and</p> <p>b) The terms of the applicable offer in Appendix 3.</p>	A Voluntary Planning Agreement (VPA) was made with Bathurst Regional Council on 18/09/2017 and Mid Coast Regional Council on 04/09/2017:
Schedule 3 Condition 11 Operational Noise Wind Turbines	<p>The Applicant shall ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 4 at any non-associated residence.</p> <p>Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the South Australian Environment Protection Authority's Wind Farms – Environmental Noise Guidelines 2009 (or its latest version), as modified by the provisions in Appendix 4. If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the requirements in the NSW guideline.</p>	Section 6.4.2 Appendix C Table 11
Schedule 3 Condition 12 Operational Noise Ancillary Infrastructure	<p>The Applicant shall ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence.</p> <p>Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (or its equivalent) as modified by the provisions in Appendix 4.</p>	Section 6.4.2 Appendix C Table 11
Schedule 3 Condition 15 Air	<p>The Applicant shall:</p> <p>(a) implement all reasonable and feasible measures to minimise the off-site dust and fume emissions of the development; and</p> <p>(b) minimise the surface disturbance of the site.</p>	Appendix C Table 10
Schedule 3 Condition 22 and 23 – Biodiversity Management Plan	<p>Prior to carrying out further work on the upgrades on Aarons Pass Road after the date of approval of Modification 1, the Applicant must prepare a revised</p>	CRWF Biodiversity Management Plan

	<p>Biodiversity Management Plan for the development to the satisfaction of the Secretary.</p> <p>Following approval, the applicant must implement the measures described in the Biodiversity Management Plan.</p>	
Schedule 3 Condition 22 and 23 – Biodiversity Management Plan	<p>Prior to carrying out further work on the upgrades on Aarons Pass Road after the date of approval of Modification 1, the Applicant must prepare a revised Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must include a Bird and Bat Adaptive Management Plan.</p> <p>Following approval, the applicant must implement the measures described in the Biodiversity Management Plan.</p>	CRWF Bird and Bat Adaptive Management Plan
Schedule 3 Condition 26 and 27 – Aboriginal Heritage Management Plan	<p>Prior to the commencement of construction, the Applicant shall prepare an Aboriginal Heritage Management Plan for the development to the satisfaction of the Secretary.</p> <p>Following approval, the applicant must implement the measures described in the Aboriginal Heritage Management Plan.</p>	CRWF Aboriginal Heritage Management Plan
Schedule 3 Condition 33 and 34 – Traffic Management	<p>Prior to carrying out further work on the upgrades on Aarons Pass Road after the date of approval of Modification 1 or the commencement of the Bombandi Road upgrades, whichever occurs first, the Applicant must prepare a revised Traffic Management Plan for the development to the satisfaction of the Secretary.</p> <p>Following approval, the applicant must implement the measures described in the Traffic Management Plan.</p>	CRWF Traffic Management Plan
Schedule 3 Condition 37 – Telecommunications	<p>If the development results in the disruption to radio or telecommunications services in the area, then the Applicant shall make good any disruption to these services as soon as practicable following the disruption.</p> <p>If there is a dispute about the mitigation measures to be implemented or the implementation of these mitigation measures, then either party may refer the matter to the Secretary for resolution.</p>	Section 6.4.4 and Table 13
Schedule 3 Condition 39 – Safety	<p>The Applicant shall:</p> <ol style="list-style-type: none"> a. Prepare a Safety Management System for the development in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 9 ‘Safety Management’ prior to commissioning any wind turbines on site; and b. Implement, and if necessary update, the system over the remaining life of the development. 	Separate plan available as standalone document
Schedule 3- Condition 40 – Waste	<p>The Applicant shall:</p> <ol style="list-style-type: none"> a. Implement all reasonable and feasible measures to minimise the waste generated by the development; b. Classify all waste in accordance with the EPA’s Waste Classification Guidelines and at appropriately licensed waste facilities; and 	Table 12

	c. Manage the waste in accordance with any requirements under the POEO Act and its associated regulations.	
Schedule 5 Condition 1 – Environmental Management Strategy	Prior to the commencement of construction, the Applicant shall prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	Section 3
	a. Provide the strategic framework for the environmental management of the development;	
	b. Identify the statutory approvals that apply to the development;	Section 2
	c. Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 6
	d. Describe the procedures that would be implemented to:	Section 6.3
	– Keep the local community and relevant agencies informed about the operation and environmental performance of the development;	
	– Receive, handle and respond to, and record complaints;	Section 6.4
	– Resolve any disputes that may arise;	Section 6.4
	– Respond to any non-compliance;	Section 7
	– Respond to any emergencies; and	Section 6.6
	e. Includes:	Section 2.3 – this table
	– Copies of any strategies, plans and programs approved under the conditions of consent; and	
	– A clear plan depicting all the monitoring to be carried out in relation to the development.	Section 7
Schedule 5 Condition 2 – Environmental Management Strategy	Following approval, the Applicant shall implement the Environmental Management Strategy.	This plan
Schedule 5 Condition 3 – Adaptive Management	The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary.	Section 4 and 7

2.4 EPBC Approval

An Approval from the Department of the Environment and Energy (now Department of Climate Change, Energy, the Environmental and Water (DCCEEW)) was issued for undertaking a Controlled Action under the EPBC Act (EPBC 2011/6206). All conditions from EPBC 2011/6206 are included in the CRWF Compliance Register.

2.5 Environment Protection Licence

CRWF holds an Environment Protection Licence (EPL) for the Project (EPL 21090). The EPL lists one Scheduled Activity as defined in Schedule 1 of the POEO Act being electricity generation – 0 – 450 GWh annual generating capacity.

All EPL Conditions are included in the CRWF Compliance Register.

2.6 Relevant Legislation

In preparing the EA and subsequent Approval documents, several legislative, regulatory, and statutory instruments were reviewed. The key instruments which apply to the operation of the Project are detailed in Appendix B.

3 Environmental Management Framework

3.1 Environmental Management Strategy

This EMS provides a strategic framework for environmental management of the Project and outlines the Proponent’s commitments to community engagement, environmental management and reduction of any Project related impacts.

The strategic framework is structured generally in accordance with ISO 14001:2015’s process of Plan → Do → Check → Act.

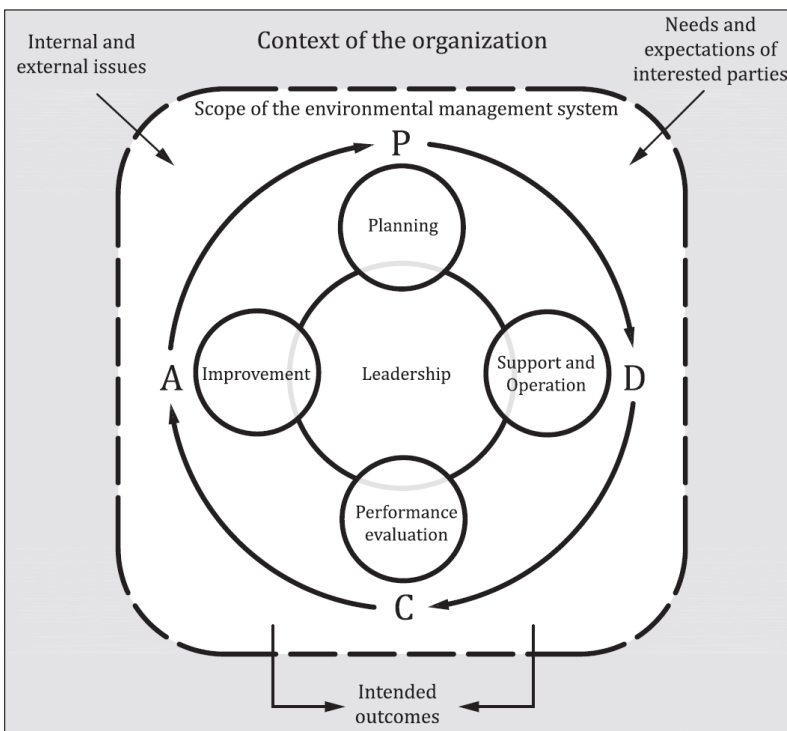


Figure 2 ISO14001:2015 Plan-Do-Check-Act extract

Table 3 Structure of the EMS

Feature	Requirements	Where addressed in EMS
Plan	Establish the objectives and processes necessary to deliver results in accordance with the organisation’s environmental policy	Section 3
Do	Implement the process.	Section 4, 5 and 6
Check	Monitor and measure processes against environmental policy, objectives, targets, legal and other requirements and report the results	Section 7
Act	Take actions to continually improve performance of the EMS.	Section 7 and 8

3.2 Environmental Policy and Commitment

All Project activities will be undertaken in accordance with the relevant principles of the CWPR's Environmental Policy (CWP_POL_02) which is provided in Appendix A. This policy has been structured generally in accordance with ISO 14001:2015 and specifically commits to:

- Continual improvement of environmental performance
- Prevention of pollution
- Compliance with relevant legal and other requirements
- Developing a framework for identifying objectives and targets.

The policy will be communicated to all staff and contractors during induction and will be available via the Project website. It will be periodically reviewed against environmental performance and industry practice.

3.3 Environmental Objectives and Targets

The overall operational objective CRWF is to ensure that all plant and equipment used on site, or in connection with the development, is maintained in a proper and efficient condition; and operated in a proper and efficient manner.

Environmental objectives and targets will be set and reviewed regularly throughout operation. These will reflect the intent of the CWPR Environmental Policy and will measure performance of the EMS. The targets will be developed to address the following:

- The Project Risk Register
- Statutory and other requirements
- Outcomes of community and agency consultation
- The Project's organisational, economic and social considerations.

At a minimum, the objectives and targets will be set for the following:

- Environmental risks where the adequacy of mitigations has identified to be 'Satisfactory' or lesser
- Total number of non-conformances and incidents
- Total number of complaints received internally and from the community
- Implementation of the EMS and associated management plans
- Staff training
- Assessment of the environmental competency of relevant staff.

4 Environmental Risks (Criteria and Impacts)

4.1 Identification of Environmental Risks

Environmental risks (criteria and impacts) were identified in the Development Application which formed the basis of the Development Consent. Prior to commencement of operation, the CWPR Risk Issue Management Procedure was used to evaluate the potential environmental risks of the criteria and/or performance measures detailed in Schedule 3 of the NSW Development Consent and to develop environmental management programs, plans and procedures, which will be incorporated into staff training.

Any exceedance of these criteria and/or performance measures constitutes a breach of the NSW Development Consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.

Where any exceedance of the criteria and/or performance measures has occurred, the following actions will be followed at the earliest opportunity:

- The Site Manager will take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur
- The Site Manager will consider all reasonable and feasible options for remediation (where relevant)
- The Environmental officer will submit a report to the Department describing those options and any preferred remediation measures or other course of action
- The Site Manager will implement remediation measures as directed by the Secretary.

Throughout operation the Project's Risk Register will be reviewed and updated by the Site Manager.

5 Environmental Management Plans

The EA and the Project Risk Register presented at Section 4.1 of this EMS identify the key environmental factors of the Project which require mitigation and management.

The NSW Development Consent required several Environmental Management Plans be prepared to deal with key environmental factors in addition to this EMS. The specific management plans required by the Development Consent are:

- Biodiversity Management Plan (BMP)
- Bird and Bat Adaptive Management Plan (BBAMP)
- Aboriginal Heritage Management Plan (AHMP)
- Traffic Management Plan (TMP)
- Safety Management System (SMS) (prepared by FSA provider)

These plans are available as stand alone documents. Consistent with the requirements of Schedule 5, Condition 4 of the NSW Development Consent the plans will be reviewed and if necessary revised if an incident occurs, if a modification to the consent occurs or within 3 months of an independent audit. The revised plan will be submitted within 4 weeks of the review to the Secretary.

The Project Environmental Officer will be responsible for maintaining the approved management plans and making the plans available to staff, contractors and the public via the Project website. All staff and contractors will be responsible for conducting Project related works in accordance with the management plans.

5.1 Operational Environmental Management

During operations this EMS will continue to be supported by the EMS management plans listed above, and the additional operational environmental mitigation measures detailed in Appendix C:

- Air Quality mitigation measures
- Noise and Vibration mitigation measures
- Waste management measures

5.2 Decommission and Rehabilitation

Pursuant to Schedule 3 Condition 43 and 44, any individual WTG which ceases operating for more than 12 consecutive months will be dismantled within 18 months after the 12 months period, unless the Secretary agrees otherwise. A WTG decommissioning plan will be prepared and this EMS revised to the satisfaction of the Secretary prior to decommissioning works commencing. The revised plans will be submitted to the Secretary within 4 weeks of the review, for the Secretary's approval.

6 Implementation and Operation

6.1 Structure and responsibility

It is the responsibility of all Project staff members and contractors to implement the requirements outlined in this EMS. Specific responsibilities for administering, implementing, monitoring, and reporting are detailed in Table 4. Each Contractor will be responsible for implementing the actions identified in the management plans and programs in order to comply with the Development Consent conditions.

Table 4 Roles and responsibilities

Role	Responsibility
Site Manager	<ul style="list-style-type: none"> Responsible for implementation of CWP Renewables Environmental Policy Responsible for management of the Project in accordance with this EMS and associated management plans and statements Undertake day-to-day management and compliance with the Project's environmental requirements and policies Maintain and update the Project Risk Register Provide adequate resources to allow the implementation of the Project EMS Promote the reporting of incidents, near misses, hazards, non-conformances, system improvements and complaints and ensure environmental incidents are investigated and corrective actions are implemented in a timely manner Undertake regular inspections/monitoring and implementation of corrective actions (refer to Table 7) Ensure site specific environmental requirements are fulfilled and be the primary point of contact for community enquiries, complaints and liaison Ensure all Project personnel attend an environmental site induction prior to commencing work and are aware of environmental issues and constraints.
Project Environmental Officer	<ul style="list-style-type: none"> Ensure site specific environmental requirements are fulfilled Verify compliance with the EMS, management plans and programs Undertake environmental surveillance, internal auditing and reporting Be the primary point of contact for regulatory agency liaison Arrange independent audits Review and update EMS and management plans Report to the Site Manager on environmental performance of the Project Track compliance obligation and maintain a Compliance Register that is readily accessible by all staff and contractors.
Independent Environmental Auditor	<ul style="list-style-type: none"> Review the adequacy of the measures undertaken to deliver the Project in accordance with the EMS, management plans, programs, Development Consent and Commonwealth approval. To be undertaken within six months of the commencement of construction and every three years thereafter, consistent with the requirements of the Approval Request reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, direct that relevant actions be ceased immediately Provide an audit report to be forwarded to the Secretary or Minister as relevant that: <ul style="list-style-type: none"> assesses whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under the consent

-
- recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under the consent
-

FSA Provider (GE)

- Undertake all works in accordance with the Project Approvals, Licences, Permits, CRWF Approved Environmental Management Strategy (and associated sub-plans) and FSA Environmental Management Plan.
 - Ensure all contractors and subcontractors are inducted prior to commencing work;
 - Hold regular Project team meetings and toolbox talks, ensuring information is shared between all site personnel;
 - Immediately cease, and report, any workplace activity (including that of other persons) which presents an immediate risk to the environment.
 - Report all incidents, near misses and environmental hazards to the Site Manager immediately.
 - Participate in or conduct incident investigations, risk assessments, inspections, toolbox meetings and audits as required by CRWF.
 - Contribute to the overall goal for zero environmental impacts and incidents by making suggestions for improvement where identified.
-

All Employees and Contractors

- Undertake site inductions and training and comply with all aspects of this EMS and all associated compliance documents, permits, procedures and standards
 - Undertake all activities in accordance with agreed procedures and work methods
 - Implement the actions identified in their management plans and programs in order to comply with the Development Consent conditions
 - Immediately cease and report any workplace activity which presents an immediate risk to the environment to the Site Manager
 - Report all incidents, near misses and hazards to the Site Manager immediately
 - Participation or conduction of incident investigations, risk assessments, inspections, toolbox meetings and audits as required.
-

6.2 Training, awareness and competence

Training awareness and competence systems have been designed to ensure contractors and staff have an adequate understanding of the Project's environmental criteria and impacts, the requirements or relevant programs and plans, and their own responsibilities and tasks. The system includes a site induction, ongoing targeted environmental training, and toolbox talks. The Site Manager will ensure that relevant training and awareness is completed by project staff and contractors.

6.2.1 Site Induction

All staff and contractors working on site will be required to undertake a site induction prior to commencing work on the site. Inductions will address the requirements of this EMS and highlight the relevant roles and responsibilities. Emergency response training will be incorporated in the induction training.

A visitor induction will be developed and given for people attending the Project, but not engaged in daily work activities. This could include members of the media, politicians, delivery drivers, staff, consultants and invited guests visiting the Project. Visitor inductions will highlight any areas of risk or where access cannot be permitted without a trained and qualified staff member.

6.2.2 Environmental Training

Targeted environmental training will be conducted for key operational tasks or work areas that are considered particularly sensitive e.g. site access and biodiversity management. The environmental training content will be developed by Project Environment Officer in consultation with the Site Manager.

6.2.3 Toolbox Talks

Regular toolbox talks will identify the environmental risks, mitigation measures and responsibilities relevant to the activities being completed. More detailed toolbox talks will be completed as needed to address specific environmental issues, environmental incidents or improvement initiatives. Toolbox talks will be coordinated by the Site Manager and GE Renewable Energy Australia, to facilitate sharing of information between all site personnel.

6.2.4 Records

Training records will be maintained by GE Renewable Energy Australia to demonstrate compliance with the requirements of this EMS, and records will include:

- Who was trained
- When training occurred
- Name and relevant details of trainer
- Description of training content.

Copies of these records will be forwarded to the Project Environmental Officer for their records.

6.3 Communication

Effective, two-way communication between the Project and external stakeholders is imperative to the success of the EMS and the Project as a whole.

6.3.1 Community Consultative Committee

A Community Consultative Committee (CCC) has been established for the project, as per Schedule 5, Condition 5 of the Development Consent. The Site Manager will facilitate interaction between the CCC and the relevant Project personnel. Other personnel may be required to attend CCC meetings at the request of the Site Manager. The CCC will be operated in accordance with the *Community Consultative Committee Guidelines for State Significant Project (2016)*, or its latest version.

6.3.2 Internal Communication

Communication between the Project staff and contractors (specialist service providers) is classified as internal communication and will be typified by emails, phone-calls, meetings, toolbox talks and internal reporting (e.g., audit reports, progress reports and incident reports). The Project Environmental Officer is responsible for handling internal communication related to the environmental aspects and impacts of the Project. The Project training system also forms part of the internal communication process through induction and ongoing training information on environmental aspects and impacts.

6.3.3 External Communication

External communication is between the Project and external stakeholders such as neighbours, the wider community, government agencies, and general public. External communication methods include: Project website, social Media, advertisements, letters, emails, and information/complaints telephone line. The Site Manager will be the primary point for contact for all external communication throughout operation.

External communication commenced during the site identification phase and will continue until the Project is decommissioned.

Project Website

The Project website is one of the core external communication tools. It is regularly updated with the Project status and will make publicly available copies of documents specified in Schedule 5, Condition 7 and 10 of the NSW Development Consent. These documents include:

- The EA
- The final layout plans for the development
- Current statutory approvals for the development
- The proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged
- A comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent
- A complaint register, which is to be updated on a monthly basis
- Minutes of CCC meetings
- The annual Statement of Compliance with the EPL
- Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and
- Any other matter required by the Secretary.

Social Media

In addition to a site website, the CRWF will maintain a social media presence to keep the broader community informed about the Project, its progress and any matters that may impact on the community such as scheduled component deliveries or out-of-hours works.

6.4 Complaints management and dispute resolution

6.4.1 Complaints Management

The Project maintains a 48-hour telephone number, postal address and email address to receive complaints and enquiries during operation

A Complaints Register is maintained to record:

- a. Date and time of complaint/enquiry
- b. Type of communication (i.e. telephone, mail, meeting, email etc.)

- c. Name, address, contact telephone number of complainant/enquirer (if possible, and permitted by the complainant/enquirer)
- d. Nature of the complaint and enquiry
- e. Actions taken in response including timeframes for implementing the action
- f. If no action was taken, the justification for why not
- g. When and how the complainant/enquirer was notified of the outcome or provided an answer.

Complaints will be responded to within 48-hours. Initial contact with the complainant will either outline actions taken to resolve the complainant or a holding statement while the complaint is being investigated. Depending on the nature and complexity of the complaint resolution may take additional time.

The Complaints Register will be updated monthly as per Schedule 5, Condition 10 of the Development Consent. By its nature, the Complaints Register may contain sensitive personal details. A summary of the Complaints Register will be placed on the Project website (noting personal information relating to the complaint or the person making the complaint will be removed).

6.4.2 Noise specific complaints

When complaints relate to noise issues, these will be managed using the same general procedure as outlined above. However, the following information may also be collected in relation to any noise complaint:

- Nature of the noise:
 - Tonal
 - Intermittent, pulsing or continuous
 - High or low frequency
 - Single turbine in particular or whole wind farm
- Time of day – day/ night/ morning/ evening
- Location: Distance from nearest wind turbine. Inside/ outside dwelling. Windows open.
- Weather conditions: Wind speed and direction, temperature, rain/ humidity, cloud cover.

6.4.3 Visual impact specific complaints

When complaints relate to visual issues, these will be managed using the same general procedure. However, where the complaint is received from a landowner identified in Table 5 or any non-associated residence within 4km of any WTG, within the first 5 years from commencement of construction, and this complaint includes a request for additional visual mitigation measures at their residence, the following measures will be taken:

- The Applicant will consult with the owner to identify appropriate mitigation measures (such as landscaping, vegetation screening, provision of awnings/blinds) at the residence (including its curtilage).
- The mitigation measures will be reasonable and feasible, directed towards reducing the visual impacts of the wind turbines on the residence (including its curtilage), and commensurate with the level of visual impact. Note 1: Mitigation measures are not required to be implemented to reduce the visibility

of wind turbines from other locations on the property. Note 2: In some cases, mitigation measures may not be warranted as the wind turbines would not be visible from the residence and its curtilage.

- The mitigation measures will be implemented within 12 months of receiving the written request, unless the Secretary agrees otherwise.
- If the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.

Table 5: Visual impact mitigation upon request

Residence ID	Status
CR19, CR27, CR28, CR35, CR36, CR37, SFR04, SFR05, SFR08, SFR10, SFR11, SFR12, SFR13, SFR14, SFR16, SFR17, SFR18, SFR19, SFR20, PL01, CR26	Consult if visual complaint is received.
SFR15	Host

Pursuant to Condition 1, Schedule 3, if any of the landowners listed in Table 6 request land acquisition within 5 years of construction, the Proponent will be required to acquire the land in accordance with the procedures outlined in Condition 2 and 3 of Schedule 4.

Table 6: Potential acquisition upon request

Residence ID	Status
CR33, CR34, CR18, CR24	Follow procedures outlined in Condition 2 and 3 of Schedule 4.
CR15, CR41,	Neighbour Agreement in place, acquisition no longer required

6.4.4 Telecommunications specific complaints

Pursuant to NSW Development Consent SSD-9967, Schedule 3, Condition 37, the following protocol will apply to any complaints received in relation to disrupted radio or telecommunications in the area:

1. Upon receiving a complaint about radio signal, the Site Manager will log all details of the complaint in the complaints register.
2. The location of the disrupted signal will be reviewed to ascertain the proximity to wind turbines.
3. An investigation will be undertaken with the afflicted parties to determine the cause of the signal reduction. This may require commissioning of a suitably qualified TV/Radio engineer to make an assessment of the property signal and to ascertain the likely cause.
4. Should the wind farm be directly responsible for the reduction of signal then the wind farm owner will negotiate with the landowner regarding a solution to remedy the signal reduction. Potential mitigation measures are outlined in Table 13.

6.4.5 Dispute Resolution

The Project complaints handling process is designed to avoid disputes arising following the receipt of a complaint. As demonstrated in Section 6.4.1 all complaints will be responded to within 48 hours. It is the Project's aim to maintain a good relationship with all internal and external stakeholders so that no disputes eventuate.

All efforts will be made to resolve a dispute internally with the affected party. A meeting will be held with senior team members and environmental officer (or other relevant technical expert) to clarify the dispute and actions taken to date. An investigation will be undertaken to assess the nature of the dispute and possible mitigation measures / resolution. The relevant results of such investigation will be reported to the affected party with the aim of reaching a mutual agreement between parties. This agreement will be documented, and implementation monitored in accordance with the agreed actions and timeframes. Where considered appropriate, an independent person may be asked to provide advice on the investigation and resolution.

In event that a complaint cannot be resolved, either party may refer the dispute to the Secretary for resolution in accordance with the Development Consent. This includes disputes pertaining to:

- Visual impact mitigation measures (Schedule 3 Condition 2)
- Road upgrades to be implemented (Schedule 3 Condition 28 and 29)
- Scope and implementation of road maintenance and remedial works (Schedule 3 Condition 30)
- Mitigation measures implemented in response to disruptions to radio communications (Schedule 3 Condition 37)
- Land acquisition from a landowner with acquisition rights (Schedule 4 Condition 2).

Complaints will be responded to as soon as practicable either via actions taken to resolve the complainant or a holding statement while the complaint is being investigated.

The Complaints Register will be made available to the public via the project website as discussed in Section 6.4.1 above.

6.5 Document control

The Site Manager will establish a document control process to ensure environmental documentation remains current and can be easily located and reviewed. CRWF will maintain all documents in accordance with a quality management system. A summary of the proposed system is as follows:

- Keeping hard copies and electronic copies of documents in accordance with the ISO 9001/2008 Standard of Quality Management, where applicable
- A Quality Assurance and Version Control Table is included at the beginning of every document, where appropriate
- All documentation is to be retained beyond the life of the Project.

The Environment Officer will establish and maintain a document register. The register will be used to manage controlled documents (i.e., documents requiring approval for implementation and revision) produced by the Project team.

It is the responsibility of the Project Environmental Officer to ensure that document control of environmental documents and records is functioning effectively.

6.6 Emergency preparedness and response

Emergency response measures to control environmental emergencies such as fire, are addressed in the Emergency Response Plan (ERP). The ERP forms part of the Safety Management Plan required by Schedule 3, Condition 39 of the Development Consent. Emergency response measures have been developed to manage environmental emergencies, should they occur and the Site Manager is responsible for adapting, implementing and reviewing the ERP. The plan includes the process to be followed in the

event of an emergency (including evacuation details and muster points) and communication procedures. The plan includes a list of emergency contacts, and maps to muster points and the nearest emergency facilities. The Safety Management Plan is available as a standalone document.

A Pollution Incident Response Management Plan (PIRMP) has been prepared by CRWF in accordance with the requirements of the POEO Act. The PIRMP minimises the risk of a pollution incident by firstly identifying risks, putting measures in place to reduce the likelihood of an incident occurrence, and finally planning and practising the response to a pollution incident. The PIRMP is available as a standalone document.

All staff will be trained in emergency preparedness and response. Higher risk activities will involve a higher degree of preparedness and training.

7 Environmental Monitoring, Reporting, Corrective Actions and Audits

7.1 Environmental Monitoring

Environmental monitoring will be used to measure performance of the EMS and compliance with relevant statutory requirements. The Project Environmental Officer will conduct regular internal desktop and site monitoring during operations to ensure the Project is complying with the EMS commitments and the relevant conditions of approval.

Environmental monitoring checklists will be developed, and environmental inspections will include evaluation of performance against objectives and targets identified in the environmental management plans and programs. The Site Manager will undertake the range of inspections outlined in Table 7

Table 7 Monitoring activities

Frequency	Area or Activity
Daily inspections	<ul style="list-style-type: none"> • Bird/Bat strikes; other on site fauna injuries • Weather forecast • Fire Danger Rating • Dust generation and abatement measures • Compliance with management plans and environmental performance
Weekly monitoring	<ul style="list-style-type: none"> • Effectiveness of installed erosion and sediment control measures • Noise minimisation and mitigation • Waste generation and management • Hazardous material storage to determine if undertaken in accordance with AS1940-2004 • Biodiversity impacts • Cultural heritage impacts • Corrective Actions Notices issued.
Monthly monitoring	<ul style="list-style-type: none"> • Rehabilitated areas: <ul style="list-style-type: none"> – Stability assessment and erosion present – Groundcover % – Weeds presence • Monthly waste generation and resource usage • Complaints received • Vegetation growth for bushfire risk • Corrective Actions undertaken • Environmental incident reports.
Additional specialist or focussed monitoring	<ul style="list-style-type: none"> • Ad hoc inspections or monitoring required by environmental triggers, or as required by specific management plan.
Erosion and sediment control measures	<ul style="list-style-type: none"> • Temporary or current erosion and sediment control measures will be monitored: <ul style="list-style-type: none"> – Weekly – After a rainfall event of 30mm or more – After the rainfall event has finished

	- Daily during maintenance.
Vehicle weed inspections:	<ul style="list-style-type: none"> If any vehicle has been off paved roads or internal roads where weeds are known to be present

The Project Environmental Officer will undertake an internal audit against the Development Consent during operations and provide the findings to the Site Manager. A full independent audit as described in Schedule 5 Condition 8 of the NSW Development Consent was undertaken within 1 year of the commencement of construction and will be conducted every 3 years thereafter unless the Secretary directs otherwise. The Project must commission and pay the full cost of the independent environmental audit.

All monitoring results and records will be kept for the duration of the Project. The results of monitoring may be referred to a specialist consultant, if required.

7.2 Environmental Reporting Obligations

Table 8 Environmental reporting obligations

Condition	Report description	Timing	Reported to
SSD-6697			
Schedule 2 Condition 9	Notification to Department	Prior to commencement of an activity	DPE Compliance via the Major Projects portal
Schedule 5 Condition 6	Incident notification	Within 7 days after becoming aware of the incident	
Schedule 5 Condition 6A	Non-compliance notification	Within 7 days after becoming aware of any non-compliance	
Schedule 5 Condition 7	Regular reporting on environmental performance	In accordance with the reporting arrangements of any plan or programs approved under the conditions of consent.	
Schedule 5 Condition 9	Independent environmental audit reports	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary.	
EPBC 2011/6206			
Condition 10	Annual compliance report (reporting period covering 24 th May – 25 th May).	To be completed, published and submitted by 25 August each year.	Report to be published on the CRWF Project Website. Documentary evidence of date of publish must be provided to DCCEEW: postapproval@awe.gov.au and EPBCmonitoring@awe.gov.au
Condition 11	Potential or actual contravention reporting	Within 7 days of becoming aware of the actual or potential contravention.	Report to the DCCEEW: postapproval@awe.gov.au
EPL 21090			

R1.5	Annual Return (reporting period covering 24 th April – 26 th April)	To be completed and submitted by 27 June each year.	Reported via eConnect EPA or submitted by registered post.
R2.1	Report actual or material harm to the EPA immediately.	Immediately after becoming aware of the actual or potential material harm.	EPA Environmental Line 131 555
R2.2	Provide a written report of the material harm incident	Within 7 days of the date on which the incident occurred.	To the local EPA office: Central.west@epa.nsw.gov.au

7.3 Non-conformances

Any non-conformances will be recorded by the Project Environmental Officer and reported to the Site Manager. The Project Environmental Officer will record the non-conformance in the CWP Non-conformance Register (IMS). All non-conformances will be notified to the Department in accordance with Schedule 5 Condition 6A of the NSW Development Consent. The Corrective Actions will be recorded in the Corrective Actions Register. If the non-conformance is an “incident” then compliance with the incident reporting notification requirements as outlined in Section 7.4 must be achieved.

A non-conformance may be identified by substantiated community complaint, site monitoring, independent audit, failure to observe the requirements of the EMS, or failure to comply with environmental legislation. In the event of a non-compliance, investigation by the Project Environmental Officer will occur with a view to identifying the source, reason, and implications of the non-conformance. Remedial actions will be developed in consultation with the relevant staff members and may include:

- Amendment of the EMS
- Additional control measures
- Staff training
- Amended procedures, or
- Disciplinary actions.

Once the course of action to correct a non-conformance has been determined the EPC Contractor or Site Manager will implement the remedial actions.

7.4 Incident Management

As per the consent, the definition of an incident is “a set of circumstances that causes or threatens to cause material harm to the environment and/or breaches or exceeds the limits of performance measures/criteria in this consent”. Environmental incidents may vary in severity and can arise during normal, unexpected and emergency situations.

All environmental incidents will be immediately reported to the Project Environmental Officer who will direct immediate remedial actions in consultation with the Site Manager.

For environmental incidents that don’t cause or threaten to cause material harm to the environment, the Project Environmental Officer and Site Manager will determine what external agencies need to be notified (e.g. Environmental Protection Authority (EPA), Biodiversity, Conservation and Science Directorate (BCS), DPE, Council, Transport for NSW (TfNSW)) in accordance with the POEO Act. Within seven (7) days of the date of the incident, the Project Environmental Officer shall provide the Department via the Projects

website portal and any other relevant agencies with a detailed report on the incident, and such further reports as may be reasonably requested.

All staff and contractors will be trained in incident reporting during the site induction. This training will include information on the responsibility of every staff member to report incidents and how to report an incident.

All environmental incidents will be reported to the Department as required under Schedule 5 Condition 6 of the NSW Development Consent. Responsive actions will be investigated and recorded in the CWP Incident Register and reported at Project management meetings. This notice will record:

- Name and role of employee recording the incident
- Date and time of incident
- Location of incident
- Size and type of land area affected (e.g. creek, vegetation, road etc.)
- Type of incident (e.g. spill, fire etc.)
- Details of any offsite impacts
- Immediate responses and further actions
- Adaptive management changes to avoid repeat of an incident.

All events/incidents must be closed out to the satisfaction of the Project Environmental Officer and the Site Manager. A non-conformance report will be completed for any incident that relates to a non-conformance with this EMS.

7.4.1 'Material Harm' Environmental Incidents

Part 5.7 of the *Protection of the Environment Operations Act 1997* (POEO Act) requires that all 'Material Harm' Incidents be reported to the EPA immediately. The NSW Development Consent also requires that 'Material Harm' Incidents be reported to the Department immediately after the Applicant becomes aware of the incident.

In this context, an Incident is defined as:

"A set of circumstances that causes or threatens to cause material harm to the environment."

'Material Harm' is defined as harm that:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment."

More information on 'Pollution Incidents' can be found in the Pollution Incident Response Management Plan (PIRMP) for CRWF.

7.5 Incident register

Environmental incidents and responsive actions will be recorded in the CWP Incident Register and reported at Project management meetings.

All incidents must be closed out to the satisfaction of the Project Environmental Officer and the Site Manager.

7.6 Corrective and preventative action

The Project Environmental Officer will review the EMS yearly from the commencement of operation or as required under Schedule 5 Condition 4. The review will ensure the controls reflect any changes in legislation or work procedures.

The review will consider if any changes to the EMS are required based on:

- Environmental monitoring results
- Complaints
- Incident reports
- Non-conformances
- Relevant legislative changes
- Changes in operation methodology.

Continual improvement through adaptive management of the EMS will be achieved by ongoing compliance reviews and reporting. Project Environmental Officer involvement in regular management meetings and tool-box talks will identify opportunities for improved environmental management in response to work procedures, complaints and non-conformances.

Major changes to the EMS will require approval of the DPE.

7.7 Audits

7.7.1 Independent Environmental Audit

In accordance with Schedule 5, Condition 8 of the NSW Development Consent, within 1 year of commencement of construction, and every three years thereafter, unless the Secretary directs otherwise, the Applicant will commission and pay the full cost of an Independent Environmental Audit of the development. The audit will:

- a. Be prepared in accordance with the relevant Independent Audit Post Approval Requirements (DPE 2018, or its latest version)
- b. Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary
- c. Include consultation with the relevant agencies
- d. Assess the environmental performance of the development, and whether it complies with the relevant requirements in the consent
- e. Review the adequacy of any approved strategy, plan or program required under the abovementioned consent
- f. Recommend measures or actions to improve the environmental performance of the development and/or any strategy, plan or program required under this consent.

Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, the Applicant will submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

An Independent Environmental Audit was conducted in November 2019, within 1 (one) year of project commencement and will be conducted every 3 years in accordance with Schedule 5 Condition 8, of the NSW Development Consent.

7.7.2 Scheduled Project Environmental Audits

Project Environmental Audits are scheduled by the Project Environmental Officer and/or Environmental Manager. The CWP Audit Schedule contains all project audits and audit reports

8 Review

Regular formal site inspections in accordance with programs and plans and daily general observations of the site will be undertaken by the Site Manager. Any problems or risks identified during this process will be assessed and, where required, reported as a non-conformance.

An internal review of the Project EMS will occur yearly to assess performance. The strategy will be revised as necessary or as required under Schedule 5 Condition 4.

9 References

Fairfull, S. & Witheridge, G. (2003). Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings. NSW Department of Primary Industries.

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Landcom. (2004). Managing Urban Stormwater: Soils and Construction (Blue Book). New South Wales Government

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NSW Department of Land and Water Conservation (NSW DLWC). (1994). Guidelines for planning, construction and maintenance of tracks. NSW Department of Land and Water Conservation, Maitland, NSW.

NSW Department of Planning & Environment (2015). Post-approval requirements for State significant developments Independent Audit Guidelines

NSW Department of Primary Industries (NSW DPI). (2004). Policy and Guidelines for Fish Friendly Waterway Crossings. NSW Department of Primary Industries, Sydney.


Appendix A Environmental Policy

ENVIRONMENTAL POLICY

CWPR-00-POL-02_Environmental

17 May 2021

REVISION CONTROL

Revision	Date	Issue	Author	Reviewed	Approved	Signature
000	17/05/2021	1	Phaedra Reynolds	Leanne Cross	Jason Willoughby	

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1 Introduction

1.1 Purpose

The purpose of this policy is to ensure projects owned and operated by CWP Renewables minimise environmental detriment, and maximise environmental benefit, while minimising CWP Renewable's environmental footprint.

1.2 Scope

The Environmental Policy (Policy) applies to Grassroots Renewable Energy Pty Ltd as trustee for the Grassroots Renewable Energy Trust and its subsidiaries including CWP Renewables Pty Ltd (CWPR).

This policy applies to all employees and all persons performing work at the direction of, or on behalf of, CWPR (for example, contractors, consultants, temporary staff and 'workers' as otherwise defined under the Work Health and Safety Act 2011), collectively referred to as 'Employees'.

This Policy does not form part of any Employee's contract of employment or any contract for services between CWPR and any Employee who does not have a contract of employment with CWPR.

2 Policy

CWPR is committed to sustainable environmental practices. This is achieved by the following:

- Maintaining ISO 14001:2015 to ensure there is an effective framework for continual improvement to prevent environmental impacts directly or indirectly related to its operations in all business streams.
- Undertaking environmental assessment of new activities early in their development to best management and mitigate environmental impact.
- Conducting regular inspections, audits and management reviews to monitor the effectiveness and suitability of control measures and the environmental management system.
- Complying with relevant environmental legislation and regulations and adopting appropriate standards.
- Ensuring an effective mechanism exists for setting and reviewing environmental objectives and targets.
- Documenting environmental matters associated with projects and internal business operations and communicating to Employees, customers and contractors, and the public.
- Monitoring processes to ensure that operational practices are sustainable and incorporate safe and responsible disposal of waste and an efficient use of natural resources and energy.
- Running all aspects of the business in such a manner to minimise and handle any environmental incidents and emergencies should they occur.
- Senior Management being committed to the Environmental Policy and overall continual improvement.



3 Variation

CWPR reserves the right to vary, replace or terminate this policy from time to time. CWPR undertakes to regularly review this policy to take account of changes in legislation. All Employees are required to comply with changes to this Policy.

4 Relevant legislation, policies and documents

No.	Title
Legislation	Work Health and Safety Act 2011
Legislation	Environment Protection and Biodiversity Conservation Act 1999
Legislation	Environment Planning and Assessment Act 1978

Appendix B Relevant Legislation

Table 9 Relevant Legislation

Legislative instrument	Legislative requirement	Plan response
Commonwealth Legislation		
Environment Protection & Biodiversity Conservation Act 1999 (EPBC Act)	The EPBC Act protects Matters of National Environmental Significance (MNES), such as threatened species and ecological communities, migratory species (protected under international agreements) and National Heritage places (among others).	An Approval from the Department of the Environment and Energy was issued for undertaking a controlled Action under the EPBC Act (EPBC 2011/6206).
Civil Aviation Safety Regulations 1998	CASA's Manual of Standards Part 193 – Aerodromes states that, in general, an obstacle would require obstacle lighting unless an aeronautical study assesses it as being shielded by another object or that it is of no operational significance. It is CASA's view that the decision of the lighting of obstacles outside the vicinity of aerodromes is the responsibility of the Proponent, in consideration of their duty of care.	The Project was constructed in consultation with the required stakeholders. CASA confirmed that the turbines are unlikely to be a sufficiently significant hazard to aircraft operations to warrant hazard lighting.
Radiocommunications Act 1992	Part 4.1 'Standards and other technical regulation' is designed to make the introduction of infrastructure such as wind turbines efficient, flexible and responsible with regard to the interference of radio emissions. The standard also requires an adequate level of immunity from electromagnetic disturbance.	Impacts to radio communications will be remediated if occur in accordance with Project Approval SSD-6697 Conditions
Native Title Act 1993	The Native Title Act 1993 recognises the rights and interests of Indigenous people to land and aims to provide for the recognition and protection of common law native title rights. Areas of land where native title may exist include public road reserves and other Crown land.	The Project location is not subject to Native Title claims.
New South Wales Legislation and Policies		
Environmental Planning and Assessment Act 1979	The EP&A Act is the principal planning legislation for NSW. It provides a framework for the overall environmental planning and assessment of development proposals.	The Project was assessed and approved under the EP&A Act (SSD-6697).
National Parks and Wildlife Act 1974 (NPW Act)	The NPW Act outlines matters relating to flora and fauna and Aboriginal heritage.	The Project will implement the approved AHMP and BMP.
Protection of the Environment Operations Act 1997	The objectives of the POEO Act are to protect, restore and enhance the quality of the environment, in recognition of the need to maintain ecological sustainable development.	The Project will be managed to ensure pollution risks to soil, waterways and air quality are avoided or minimised. CRWF holds EPL 21090 for the Project.

Threatened Species Conservation Act 1995 (repealed) and replaced with Biodiversity Conservation Act 2016	The Act purpose is to maintain a healthy, productive and resilient environment for the greatest wellbeing of the community, now and into the future consistent with the principles of ecologically sustainable development.	The Project will implement the approved BMP.
Native Vegetation Act 2003 (repealed) and replaced with Biodiversity Conservation Act 2016 and Local Land Services Act 2013	The purpose of the Act is to promote ecologically sustainable development, prevent broad scale clearing and protect and improve native vegetation.	The Project will implement the approved BMP.
Noxious Weeds Act 1993 (repealed) and replaced with the Biosecurity Act 2015.	The Act provides a framework for the prevention, elimination and minimisation of biosecurity risks posed by biosecurity matter, dealing with biosecurity matter, carriers and potential carriers, and other activities that involve biosecurity matter, carriers or potential carriers.	The project will implement the approved BMP.
NSW Rural Fire Act 1997	The Act imposes obligations on the land managers to take all reasonable measures to prevent the occurrence and spread of wildlife to adjoining lands from lands under care and management.	The project will implement the approved BMP. The EPC Contractor prepared and implemented Emergency Management Plan.
Roads Act 1993	The Roads Act 1993 addresses authorities, functions and regulations of activities relating to the use and type of roads.	The project will implement the approved TMP.
Water Management Act 2000	The Act regulates controlled activities on waterfront land in NSW as well as the access to water for consumptive use.	Water Access Licences have been secured for the Project.
State Environmental Planning Policy 44 (Koala Habitat) (repealed) and replaced with State Environmental Planning Policy (Biodiversity & Conservation) 2021	This Policy aims to encourage the proper conservation and management of areas of natural vegetation that provides habitat for koalas to ensure a permanent free-living population over their present range and reverse the current trend of koala population decline.	Koala habitat has been assessed as part of the development impacts.

Appendix C Mitigation Measures

Table 10 Air Quality Mitigation Measures

Issue		
Dust	Limit vehicle speeds to designated speed limits on site. Suppress dust using water carts or other ameliorants to road surfaces.	Site Manager All personnel
Vehicle/plant emissions	Maintain vehicles in accordance with manufacturer's requirements.	Site Manager All personnel
Odours	Store and handle materials in accordance with the SDS Only human waste and toilet paper is disposed in the septic facility Do not dispose cooking oil, grease, chemicals, paints solvents or other toxic cleaners in the drains	Site Manager All personnel
Septic emptied by licensed waste contractor	Site Manager	

Table 11 Noise Mitigation Measures

Issue		
Noise from WTG exceeding allowable levels as modelled	Perform appropriate maintenance, modify plant operation to achieve compliance, curtail or shutdown impacting WTGs. Noise generated by the operation of the wind turbines is measured in accordance with the relevant requirements of the South Australian Environment Protection Authority's Wind Farms – Environmental Noise Guidelines 2019	Site Manager/ FSA Site Supervisor
Operating plant not performing to specification	Repair plant to achieve noise specification.	All personnel / FSA Site Supervisor
Use of high noise tools during g maintenance activities	Noisy tools only used in the daytime authorised working hours.	All personnel
Vehicle noise	Vehicles remain on formed access roads and obey speed limits of the site.	All personnel
Major WTG repairs	Undertake major repairs during daytime authorised working hours only.	Site Manager All personnel
Civil maintenance works (eg. road maintenance, drain maintenance etc).	Schedule Activities to minimise concurrent noise/vibration generating activities and provide respite breaks.	

Table 12 Waste Mitigation Measures

Issue	Mitigation Measures	Responsibilities
General housekeeping	Dispose of non hazardous waste in accordance with the waste type	All personnel /
	Dispose of hazardous waste in accordance with the SDS.	FSA Site Supervisor
	Keep work areas clean and clear of waste	
Waste collected at the Facility	All waste generated at WTGs or other work areas will be picked up and brought back to the service compound or to designated waste receptacles by the responsible personnel.	All personnel
Waste from outside the facility	No waste will be collected from outside the Project and disposed of or stored at the Project.	All personnel
Waste containers	General waste containers and recycling containers will be located throughout the workshop, service buildings and offices.	Site Manager
	The licensed waste contractor will provide the required waste receptacles and the frequency of pickups will be negotiated with the Project.	Site Manager Licensed waste contractor
	Receptacles and recycling will be emptied into the main waste containers as required.	FSA Site Supervisor All personnel
Transportation of waste	All waste will be collected and disposed of by a licensed waste contractor to a licensed Project.	Site Manager
	In accordance with Clause 70 of the POEO (Waste) Regulation 2014, A person who transports waste must ensure that the waste is transported in a manner that avoids the waste spilling, leaking or otherwise escaping from any motor vehicle or trailer used to transport the waste.	Licensed waste contractor
	All vehicles and skips will be covered when transporting waste.	
Waste in vehicles	All vehicles cleared of rubbish and deposited into appropriate receptacles as required.	Vehicle owners / operators All personnel
Green waste	Green waste will be removed from the Project to a licensed green waste disposal facility.	Site Manager FSA Site Supervisor
	Trees and logs can be placed at the project site to provide suitable habitat, to be done in consultation with an ecologist and in accordance with requirements of the BMP.	Site Manager
Metal waste	A metal recycling receptacle will be maintained in the O&M facility area and emptied when full. Metals will be sent to a recycling centre.	Site Manager / FSA Site Supervisor
Recyclables	A recycling receptacle will be maintained in the O&M facility area and collected for disposal when full. Regular inspections will be conducted to ensure the integrity of the waste. Signage on information boards will detail what is considered recyclable.	Site Manager FSA Site Supervisor
Paper and cardboard	A separate skip will be maintained for paper and cardboard, which must be covered and emptied when full. Signage on information boards will detail what is considered recyclable.	Site Manager

Issue	Mitigation Measures	Responsibilities
		FSA Site Supervisor
Organic waste	Organic waste will be disposed as general waste, with bins/skips collected for disposal when full.	Site Manager FSA Site Supervisor
Soils	Where excavation or earthworks result in excess soil they will be used onsite where practicable. If soils have to be removed from the Facility, they will be classified in accordance with the NSW EPA <i>Waste Classification Guidelines</i> .	Site Manager / FSA Site Supervisor
Hazardous waste	Managed as per CWPR Hazardous Substances and Dangerous Goods Procedure.	Site Manager / FSA Site Supervisor
Human wastes (sewage)	Septic emptied by licensed waste contractor	Site Manager
Waste records	Keep receipts or invoices or dockets from the waste transport contractor and the waste receiving facility	Site Manager FSA Site Supervisor

Table 13 Telecommunications Mitigation Measures

Issue	Mitigation measures	Responsibility
Wind farm directly responsible for the reduction of signal	Implement one of the following, following consultation with landowner: <ul style="list-style-type: none"> • Modification to or relocation of existing antennae • Installation of a directional antennae • Installation of an amplifier to boost the signal. 	Site Manager

Appendix D Notification of Commencement

Mikayla Henderson

From: no-reply@majorprojects.planning.nsw.gov.au
Sent: Wednesday, 22 December 2021 8:46 AM
To: Mikayla Henderson
Cc: Katrina O'Reilly; Leanne Cross
Subject: Crudine Ridge Wind Farm - Notification of Commencement of Operations Dec21

This email is to acknowledge receipt of the Notification of Commencement of Operations Dec21 for the Crudine Ridge Wind Farm.

The Department has no comments on the document at this time.

If you have any enquiries, please contact Katrina O'Reilly on 0429400261 at Katrina.OReilly@planning.nsw.gov.au.

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning, Industry and Environment



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Industry &
Environment**

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