

2 May 2025



# Compliance Tracking Program – Sapphire Wind Farm



Version No.: 1

Updated: 2 May 2025

# 1 Condition D5 Requirements

The specific requirements for the Compliance Tracking Program (CTP) are described in Condition D5 of the NSW Approval MP 09-0093 Modification 1. These requirements and brief description of measures taken are presented in Table 1

**Table 1: Condition D5 Compliance Tracking Requirements**

Condition D5 Requirement	Measures taken
<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the life of the project. The Program shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the project (including prior to each stage, where works are being staged);</li> <li>provisions for periodic review of the compliance status of the project against the requirements of this approval;</li> <li>provisions for periodic reporting of compliance status to the Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report;</li> <li>a program for independent environmental auditing in accordance with ISO 19011:2003 - Guidelines for Quality and/ or Environmental Management Systems Auditing;</li> <li>mechanisms for recording environmental incidents during construction and actions taken in response to those incidents;</li> <li>provisions for reporting environmental incidents to the Secretary and relevant public authorities during construction;</li> <li>procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and</li> <li>provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.</li> </ul>	<p>The CTP was approved by Secretary on 15/11/2016. Construction commenced on 9/12/2016</p> <p>In accordance with Condition B16, notification of commencement of construction was provided to the Secretary on 25/08/2016 and no staging was proposed. Notification of operation was provided on 14/12/2018, approximately 1 month after operation commenced. A Non-compliance was notified to the Department.</p> <p>Requirement now closed and not applicable to operation.</p> <p>Periodic reviews of the compliance status of the project against the requirements of this approval are completed on a 6 monthly basis.</p> <p>The results of the periodic compliance review are published on the SWF public website and are available for review by the Secretary.</p> <p>Pre-construction compliance report, dated 11/11/2016, approved by the Secretary on 15/11/2016.</p> <p>Pre-operations CTP completed in 08/2018 and published to website.</p> <p>Operational CTP available on website and periodically updated since 2019 to present.</p> <p>A program for independent auditing and general environmental auditing of SWF are completed in accordance with Section 2.13 and 2.14 of the Operational Environmental Management Plan v2 dated 12/10/2021 (OEMP)</p> <p>Not applicable for the CTP, as Project is now operational.</p> <p>However, mechanisms and provisions for reporting incidents throughout the life of the project are completed in accordance with Section 2.8 and Section 2.9 of the OEMP</p> <p>Procedure for rectifying non-compliances identified during environmental auditing, review of compliance or incident management are completed in accordance with Section 2.10 and Section 2.11 of the OEMP</p> <p>Provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval are completed in accordance with Section 2.7 of the OEMP</p>

## 2 Compliance Tracking Program – Operation

In accordance with Condition D5 of MP 09\_0093 Modification 1 this CTP has been developed to track compliance with the requirements of the approval. The project commenced operation in November 2018. This compliance tracking program reports on conditions that are applicable to the operational phase of the Project and is based on a desktop review of documentation for evidence of compliance. Conditions that require site-based inspections and evidence are not in the scope of this audit. Conditions that are related to pre-construction, construction and decommissioning are not applicable to operational activities and therefore not reported. This desktop Compliance Tracking Program was updated on 02/05/2025.

Schedule/ Condition	Terms of approval	Compliance Status	Description
<b>B1A</b>	In meeting the specific environmental performance criteria established under this approval, the Proponent 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 project.	Compliant	Current approved management plans are being implemented where measures are relevant to operation activities of the project: Operational Environmental Management Plan v2 (OEMP), dated 12/10/2021, approved 08/11/2021 Bird and Bat Adaptive Management Plan v3.3 (BBAMP), dated 14/07/2017, approved 15/08/2017 BBAMP Addendum 12/04/2022, approved 11/11/2022 Pollution Incident Response Management Plan (PIRMP) dated 15/08/2024
<b>B1</b>	The Proponent shall carry out the project: <ul style="list-style-type: none"> <li>generally in accordance with the EA; and</li> <li>in accordance with the conditions of this approval.</li> </ul>	Compliant	The OEMP and other management plans identify the relevant environmental and social issues applicable to the wind farm. Each Management plan includes a table of the conditions of consent that are applicable to the management plan.
<b>B2</b>	If there is any inconsistency between the documents referred to in condition B1, the most recent document shall prevail to the extent of any inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	Compliant	No reported inconsistency between conditions and documents identified or reported during this reporting period.
<b>B3</b>	The Proponent shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> <li>any strategies, plans, programs, reviews, audit correspondence that are submitted in accordance with the requirements of this approval;</li> <li>any report, reviews or audits commissioned by the Department regarding compliance with this approval; and</li> </ul>	Compliant	No requests, reports, review or audits commissioned by the Department as of 02/05/2025.

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	<ul style="list-style-type: none"> <li>the implementation of any actions or measures contained in these documents.</li> </ul>		
B4	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	Compliant	Documents published on the project website, as required by the condition of approval. <a href="https://www.squadronenergy.com/our-projects/sapphire-wind-farm">https://www.squadronenergy.com/our-projects/sapphire-wind-farm</a>
B7	If any wind turbine is not used for the generation of electricity for a continuous period of 12 months, it shall be decommissioned by the Proponent, unless otherwise agreed by the Secretary. The Proponent shall keep independently-verified annual records of the use of wind turbines for electricity generation. Copies of these records shall be provided to the Secretary upon request. The relevant wind turbine and any associated infrastructure is to be dismantled and removed from the site by the Proponent within 18 months of the date that the wind turbine was last used to generate electricity.	Compliant	All wind turbines have been in use, for a continuous period of 12 months, for the generation of electricity..
B9	The Proponent shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation of the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	Compliant	EPL 20848 granted 21/11/2016 and available on public website. No other environmental protection permits required
B11	<p>With the approval of the Secretary, the Proponent may submit any plan or program required by this approval on a progressive basis.</p> <p>To ensure the plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Proponent may prepare any revised plan or program without undertaking consultation with all the parties referred to under the relevant condition of this approval</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>This condition does not allow the Bird and Bat Adaptive Management Program, as required by condition C6, to be staged;</i></li> <li><i>While any plan or program may be submitted on a progressive basis, the Proponent must ensure that all development being carried out on site is covered by suitable plans or programs at all times.</i></li> <li><i>If the submission of any plan or program is to be staged, then the relevant plan or program must clearly describe the specific stage to which the plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the plan or program.</i></li> </ul>	Compliant	<p>The Proponent requested staging as per B11 on 5/12/2017.</p> <p>The Secretary approved staging of the development on 21/03/2018.</p> <p>A minor amendment to the Construction Environmental Management Plan (CEMP) was approved on 21/03/2018. This was to allow construction and operation to occur simultaneously.</p> <p>The OEMP v2 was updated and approved by the Secretary on 08/11/2021</p> <p>An Addendum BBAMP was prepared and approved by the Secretary on 11/11/2022.</p>
B15	In the event of a dispute between the Proponent and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the project, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	Not triggered	No disputes recorded between public authority and Proponent

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C6	<p>Prior to the commencement of construction, the Proponent shall prepare and submit for the approval of the Secretary a Bird and Bat Adaptive Management Program, which takes into account bird/ bat monitoring methods identified in the current editions of <i>AusWEA Best Practice Guidelines for the Implementation of Wind Energy Projects in Australia</i> and <i>Wind Farm and Birds: Interim Standards for Risk Assessment</i>. The Program shall be prepared and implemented by a suitably qualified expert, approved by the Secretary. The Program shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring. It shall:</p> <ul style="list-style-type: none"> <li>incorporate an ongoing role for the suitably qualified expert;</li> <li>set out monitoring requirements in order to assess the impact of the project on bird and bat populations, including details on survey locations, parameters to be measured, frequency of surveys and analyses and reporting. The monitoring program shall be capable of detecting any changes to the population of birds and/ or bats that can reasonably be attributed to the operation of the project, that is, data may be required to be collected prior to the commencement of construction;</li> <li>incorporate a decision making framework that sets out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;</li> <li>identify 'at risk' bird and bat groups, seasons (such as wet seasons where bird species may be attracted to nearby wetlands) and/or areas within the project site which may attract high levels of mortality and include monthly mortality assessments and periodic local population census' and bird utilisation surveys;</li> <li>identify potential mitigation measures and implementation strategies in order to reduce impacts on birds and bats such as minimising the availability of raptor perches, swift carcass removal, pest control including rabbits, use of deterrents, and sector management including switching off turbines that are predicted to or have had an unacceptable impact on bird/bat mortality at certain times; and</li> <li>identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.</li> </ul>	Compliant	<p>The BBAMP was prepared by Brett Lane and Bernard O'Callaghan (DPHI approved Brett Lane and Associates on 30/09/2016) and the BBAMP was approved by the Secretary on 15/8/2017.</p> <p>A revised monitoring program was prepared by Nature Advisory and submitted to the Department on 2/3/2022.</p> <p>An addendum to the BBAMP, incorporating the proposed revisions to the monitoring program, was approved by the Secretary 11/11/2022.</p> <p>Bird and bat monitoring and reporting is being undertaken in accordance with the approved BBAMP.</p> <p>Annual BBAMP reports submitted: Year 1, 2, 3 and 4, Year 5 (2024)</p> <p>Future BBAMPs reports will be submitted on a two year cycle, with the next report due in March 2026 (Year 7).</p>



Schedule/ Condition	Terms of approval	Compliance Status	Description
	<p>The Reports referred to under part (f) shall be submitted to the Secretary and OEH on an annual basis for the first five years of operation and every two years thereafter (unless otherwise agreed to by the Secretary), and shall be prepared within two months of the end of the reporting period. The Secretary may, at the request of the Proponent at anytime, vary the reporting requirement or period by notice in writing to the Proponent.</p> <p>The Proponent is required to implement reasonable and feasible mitigation measures as identified under part (e) where the need for further action is identified through the Bird and Bat Adaptive Management Programme, or as otherwise agreed with the Secretary.</p>		
<b>C7</b>	<p>Within 12 months of the commencement of construction, unless otherwise agreed by the Secretary, the Proponent shall retire biodiversity credits of a number and class specified in Tables 1a and 1b below to the satisfaction of OEH.</p> <p>Table 1A - Ecosystem credit requirements</p> <p>Table 1B - Species credit requirements</p>	Compliant	<p>On 25/11/2016 the Proponent requested an extension of time for retiring the biodiversity credits. The extension request detailed that 'additional' Box Gum Woodland credits along with all Koala and all <i>Swainsona sericea</i> credits generated at Windemere would be retired under the deferred credit retirement approach.</p> <p>On 02/12/2016, SWF obtained approval from Secretary to defer retiring the credits up to 5 years from commencement of operation and subject to the measures outlined in the Biodiversity Offset Package (BOP), which outlined that additional credits would be retired</p> <p>Operation commenced in 11/2018, as such credits would be retired by 11/2023.</p> <p>Biodiversity offset credits were retired from two biobank sites by 13/10/2023, to satisfy the credits required in Table 1A and Table 1B as well as the 'additional' credits as committed in the 25/11/2016 extension request and the BOP Section 3.1.1</p>
<b>C8</b>	Except as may be provided by an EPL, the project shall be constructed and operated to comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters.	Compliant	No pollution incidents have occurred in this reporting period
<b>C10</b>	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> <li>all relevant Australian Standards;</li> <li>for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</li> </ul>	Compliant	No dangerous goods used during the reporting period. All flammable materials are stored in locked, bunded containers.

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	<ul style="list-style-type: none"> <li>the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997).</li> </ul> <p>In the event of an inconsistency between the requirements listed in (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>		
<b>C13</b>	Should increases to the costs of aerial agricultural spraying on any non-associated property surrounding the site be attributable to the operation of the project, the Proponent shall fully fund to the affected landowner, the reasonable cost difference between pre-construction aerial agricultural spraying and the increased cost, as agreed between the relevant parties.	Compliant	<p>The proponent has covered the additional costs of aerial spraying when requested and demonstrated by non-associated property owners.</p> <p>No additional cost compensations requested in this reporting period.</p>
<b>C14</b>	The Proponent shall ensure that all project components on site are designed, constructed and operated to minimise ignition risks, provide for asset protection consistent with relevant RFS design guidelines (Planning for Bushfire Protection 2006 and Standards for Asset Protection) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.	Compliant	<p>Consultation with RFS and Ambulance services during construction in relation to design, Asset protection Zones (APZ), around Operations &amp; Management (O&amp;M), and emergency procedures.</p> <p>RFS contacted annually to notify of project operational status and request any feedback or fire concerns.</p> <p>Monthly inspections completed by Site Manager which looks at safety features such as fire extinguishers, and vegetation in the APZ of the O&amp;M area.</p>
<b>C15</b>	Throughout the operational life of the project, the Proponent shall regularly consult with the local RFS about details of the project, including the construction timetable and the final location of all infrastructure on the site. The Proponent shall comply with any reasonable request of the local RFS to reduce the risk of bushfire and to enable fast access in emergencies.	Compliant	Consultation via email undertaken annually at the start of the bushfire season.
<b>C16</b>	<p>If the project results in the disruption to radio or telecommunications services in the area, then the Proponent 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>	Compliant	No complaints received during this reporting period.
<b>C17</b>	Any overhead transmission line associated with the project shall be designed, constructed and operated to minimise the generation of corona and aeolian noise as far as reasonable and feasible at the nearest existing non-associated residences.	Compliant	<p>Noise compliance test results and report completed in 11/2018, confirmed no noise impacts.</p> <p>Overhead line design criteria – complies with Electricity Act NSW and AS/ NZS 7000-2016.</p> <p>No noise complaints from power lines in this reporting period.</p>

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<b>C18</b>	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> , if such a licence is required in relation to that waste.	Compliant	No outside waste received at the site during the reporting period. Waste managed in accordance with the OEMP. Monthly reports of waste generated maintained at the facility.
<b>C19</b>	The Proponent shall maximise the reuse and/or recycling of waste materials generated on site by the project, to minimise the need for treatment or disposal of those materials outside the site.	Compliant	Waste managed in accordance with the OEMP. Monthly reports of waste generated maintained at the facility.
<b>C20</b>	The Proponent shall ensure that all liquid and/or non-liquid waste generated on the site by the project is assessed and classified in accordance with Waste Classification Guidelines (DECC, 2008), or any future guideline that may supersede that document and where removed from the site is only directed to a waste management facility lawfully permitted to accept the materials.	Compliant	All liquid waste stored in locked, bunded container and disposed at registered landfill sites, in accordance with the OEMP.
<b>C21</b>	The Proponent shall ensure that no green waste associated with the project is burnt on site during the life of the project.	Compliant	No green waste has been burnt at the site.
<b>C33</b>	Disturbance to Trigonometric Reserves shall be avoided during the life of the project, unless otherwise approved by the Surveyor General and the relevant licence under the <i>Crown Lands Act 1989</i> is obtained by the Proponent.	Compliant	Letter received from Surveyor General on 07/07/2009, identifying Trigonometric stations prior to commencement of construction. None were or have been disturbed during this reporting period.
<b>D1</b>	The Proponent shall establish and operate a CCC for the project to the satisfaction of the Secretary. This CCC must be established and operated in accordance with any applicable CCC guideline. <i>Notes:</i> • The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring the Proponent complies with this approval. • The CCC should be comprised of an independent chair and appropriate representation from the Proponent, Council and the local community.	Compliant	Email from CCC chair sent to the Department on 7/6/2016 confirming operation of the CCC in accordance with condition D1. Various CCC minutes demonstrating compliance throughout construction and operation published on website. 5/08/2024: Letter from DPHI nominated a new CCC chairperson.



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D2	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall ensure that the following are available for community enquiries and complaints for the life of the project (including construction and operation) or as otherwise agreed by the Secretary:</p> <ul style="list-style-type: none"> <li>• a <u>24 hour telephone number(s)</u> on which complaints and enquiries about the project may be registered;</li> <li>• a postal address to which written complaints and enquires may be sent;</li> <li>• an email address to which electronic complaints and enquiries may be transmitted; and</li> <li>• a complaints management and mediation system for complaints unable to be resolved.</li> </ul>	Compliant	<p>The 24-hour hotline number went live at the end of 09/2016</p> <p>Number is 0261-002-122.</p> <p>Information required by this condition is available on <a href="https://www.squadronenergy.com/our-projects/sapphire-wind-farm">https://www.squadronenergy.com/our-projects/sapphire-wind-farm</a></p>
D3	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement a Complaints Management System consistent with AS 4269: <i>Complaints Handling</i> and maintain the System for the duration of construction and for the life of the project.</p>	Compliant	<p>Process for handling complaints is captured in Section 2.12 of the OEMP.</p> <p>The system is being maintained for the life of the project.</p>
D4	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the project, for the life of the project. The Proponent shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:</p> <ul style="list-style-type: none"> <li>• information on the current implementation status of the project;</li> <li>• a copy of the documents referred to under condition B1 of this approval, and any documentation supporting modifications to this approval that may be granted from time to time;</li> <li>• a copy of this approval and any future modifications to this approval;</li> <li>• a copy of each relevant environmental approval/consent, licence or permit required and obtained in relation to the project;</li> <li>• the outcomes of compliance tracking in accordance with condition D5 of this approval; and</li> <li>• details of contact point(s) to which community complaints and inquiries may be directed, including a telephone number, postal and email addresses.</li> </ul>	Compliant	<p>The website is <a href="https://www.squadronenergy.com/our-projects/sapphire-wind-farm">https://www.squadronenergy.com/our-projects/sapphire-wind-farm</a>.</p>
D5	<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall be submitted to</p>	Compliant	<p>Compliance Tracking Program (CTP) dated 10/11/2016, and pre-construction compliance report (dated 11/11/2016) approved by the Secretary on 15/11/2026.</p>

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	<p>the Secretary for approval prior to the commencement of construction and operate for the life of the project. The Program shall include, but not necessarily be limited to:</p> <ol style="list-style-type: none"> <li>provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the project (including prior to each stage, where works are being staged);</li> <li>provisions for periodic review of the compliance status of the project against the requirements of this approval;</li> <li>provisions for periodic reporting of compliance status to the Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report;</li> <li>a program for independent environmental auditing in accordance with ISO 19011:2003 - Guidelines for Quality and/ or Environmental Management Systems Auditing;</li> <li>mechanisms for recording environmental incidents during construction and actions taken in response to those incidents;</li> <li>provisions for reporting environmental incidents to the Secretary and relevant public authorities during construction;</li> <li>procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management; and</li> <li>provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.</li> </ol>		<p>The Project notified the Secretary of the expected date of commencement in a letter dated 25/08/2016, addressing CoA D5 i).</p> <p>A CTP is published on the project website biannually and therefore addresses CoA D5 ii-iii.</p> <p>OEMP contains requirements of D5 iv – viii.</p>
D6	The Proponent shall notify the Secretary within 24 hours of becoming aware of any incident with actual or potential significant off-site impacts on people or the biophysical environment. Further, the Proponent shall provide full written details of the incident to the Secretary within seven days of the date on which the incident occurred.	Compliant	<p><b>Historical non-compliance</b></p> <p>Identified in 11/2019 Independent Environmental Audit (SNC Lavalin) – the Project verbally notified the Secretary via phone call on 06/02/2019 of an SF6 gas release. The leak occurred because of a process required for the operation of the wind turbine. A written report was provided on 26/02/2019.</p> <p>The Project will ensure the Secretary is notified of any future incidents in writing within 7 days.</p>
D7	The Proponent shall meet the requirements of the Secretary to address the cause(s) or impacts of any incident, as they relate to this approval, reported in accordance with condition D6 of this approval, within such period as the Secretary may require.	Compliant	No incidents occurred during the reporting period.
D7A	<p>Within 3 months of the submission of:</p> <ul style="list-style-type: none"> <li>an incident report under condition D6 above;</li> <li>an audit under condition D8 below; or</li> </ul>	Compliant	Not incident, audit under condition D8 or modification occurred during this reporting period.

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	<ul style="list-style-type: none"> <li>any modification to the conditions of this approval (unless the conditions require otherwise),</li> </ul> <p>the Proponent shall review and, if necessary, revise the plans and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Note: This is to ensure the plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>		
D8	<p>Within fifteen months of the commencement of operation, and at any other time required by the Secretary, the Proponent shall commission an independent qualified person or team to undertake an Operational Performance Audit of the project. The independent person or team shall be approved by the Secretary prior to the commencement of the Audit. The Operational Performance Audit Report shall be submitted to the Secretary within one month of the completion of the Audit, unless otherwise agreed by the Secretary. The Audit shall:</p> <ul style="list-style-type: none"> <li>assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;</li> <li>assess the operational performance of the project against the aims and objectives for the project specified in the documents referred to under condition B1 of this approval;</li> <li>assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition B1 this approval; and</li> <li>review the effectiveness of the environmental management of the project, including any environmental impact mitigation works.</li> </ul>	Compliant	<p>The first independent Audit Report was submitted to the Department on 20/11/2019, and responses submissions sent to the Department on 27/11/2019.</p> <p>Independent audits were completed on 20/11/2019, and 13/04/2021.</p> <p>A Compliance Officer from the Department conducted a site visit on 29/09/2022 with the site manager. Only one minor issue identified during the site visit was the scouring in the drainage lines along the access roads in some areas, which might need some maintenance or inclusion in the maintenance schedule. Otherwise, the site appears to be operating well.</p> <p>Erosion was repaired during the routine annual access track maintenance.</p> <p>No other Operational Performance Audit has been requested by the Secretary, as of 02/05/2025</p>
E14	Any damage caused to property as a result of the project shall be rectified or the property owner compensated, within a reasonable timeframe, with the costs borne by the Proponent.	Compliant	No damage to property is this reporting period
E20	<p>Prior to the commencement of construction of the project, or as otherwise agreed by the Secretary, the Proponent shall nominate for the approval of the Secretary a suitably qualified and experienced Environmental Representative(s) that is independent of the design, construction and operational personnel. The Proponent shall employ the Environmental Representative(s) for the duration of construction, operation, and decommissioning or as otherwise agreed by the Secretary. The Environmental Representative(s) shall:</p> <ol style="list-style-type: none"> <li>be the principal point of advice in relation to the environmental performance of the project;</li> </ol>	Compliant	<p>The appointment of the Environmental Representative (ER) was confirmed by the Secretary on 19/08/2016.</p> <ol style="list-style-type: none"> <li>The ER would be contacted when advice is needed.</li> <li>Internal desktop audits and site inspections are undertaken in accordance with the OEMP by the Site Manager and Environmental Advisor. The ER would be contacted if any advice is needed.</li> </ol>

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	<ul style="list-style-type: none"> <li>b. monitor the implementation of environmental management plans and monitoring programs required under this approval and advise the Proponent upon the achievement of these plans/ programs;</li> <li>c. have responsibility for considering and advising the Proponent on matters specified in the conditions of this approval, and other licences and consents related to the environmental performance and impacts of the project;</li> <li>d. ensure that environmental auditing is undertaken in accordance with the project's Environmental Management System(s);</li> <li>e. be given the authority to approve/ reject minor amendments to the Construction Environmental Management Plan. What constitutes a "minor" amendment shall be clearly explained in the Construction Environmental Management Plan required under condition E21;</li> <li>f. be given the authority and independence to require reasonable and feasible steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions cease immediately until the issue is resolved should an adverse impact on the environment be likely to occur; and</li> <li>g. be consulted in responding to the community concerning the environmental performance of the project where the resolution of points of conflict between the Proponent and the community is required.</li> </ul>		<ul style="list-style-type: none"> <li>c. The ER would be contacted when advice is their consideration is needed.</li> <li>d. Section 2.13 of the approved OEMP, states independent audits are conducted at the request of the Secretary or Commonwealth DCCEEW in accordance with Condition D8 of the Major Projects Approval and Condition 7 of EPBC Approval. Audits are conducted in accordance with ISO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing.</li> <li>e. CEMP is not applicable to operation.</li> <li>f. No adverse or unintended environmental impacts have occurred during the reporting period.</li> <li>g. No community concerns have been raised during the reporting period.</li> </ul>
<b>F3</b>	<p>In the event of a complaint from a receptor located within 5 kilometres of a wind turbine regarding television/radio transmission during the operation of the project, the Proponent shall investigate the quality of transmission at the receptor compared with the pre-commissioning assessment and where any transmission problems can be reasonably attributable to the project, rectify the problems within three months of the receipt of the complaint, through the implementation of measures including:</p> <ul style="list-style-type: none"> <li>• modification to or replacement of receiving antenna;</li> <li>• installation and maintenance of a parasitic antenna system;</li> <li>• provision of a land line between the affected receptor and an antenna located in an area of favourable reception; and/or</li> <li>• other feasible measures.</li> </ul> <p>If interference cannot be overcome by the measures outlined in (a) to (d), the Proponent shall negotiate with the impacted landowner(s) about installing and maintaining a satellite receiving antenna or other agreed mitigation measures. The Proponent shall be responsible for all costs associated with any such mitigation measures.</p>	Compliant	<p>Five requests between 05/2018 to 08/2018. All works completed.</p> <p>No requests in this reporting period</p>

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F13	The Proponent shall undertake further noise monitoring of the project if required by the Secretary.	Compliant	No additional monitoring requested by the Secretary during this reporting period.
F18	<p><b>Prior to the commencement of operation</b>, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement (following approval) an <b>Operation Environmental Management Plan</b> for the project. The Plan shall outline the environmental management practices and procedures that are to be followed during operation, and shall be prepared in consultation with relevant agencies and in accordance with the Guideline for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• a description of activities to be undertaken during operation of the project (including staging and scheduling);</li> <li>• statutory and other obligations that the Proponent is required to fulfil during operation, including approval/consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</li> <li>• overall environmental policies, guidelines and principles to be applied to the operation of the project;</li> <li>• a description of the roles and responsibilities for relevant employees involved in the operation of the project, including relevant training and induction provisions for ensuring that employees are aware of their environmental and compliance obligations under these conditions of approval;</li> <li>• an environmental risk analysis to identify the key environmental performance issues associated with the operation phase;</li> <li>• details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts, including those safeguards and mitigation measures detailed in the EA (and any impacts arising from the staging of the construction of the project); and</li> <li>• details of how sector management would be used to ensure that operational noise criteria are not exceeded.</li> </ul> <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of operation, or as otherwise agreed by the Secretary. Operation shall not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval, the Proponent shall make the Plan publicly available as soon as practicable.</p> <p>Note: The approval of an Operation Environmental Management Plan does not relieve the Proponent of any other requirement associated with this project approval. If there is</p>	Compliant	The OEMP version 2, dated 12/10/202, was approved by the Secretary on 8/11/2021.

Schedule/ Condition	Terms of approval	Compliance Status	Description
	an inconsistency with an approved Operation Environmental Management Plan and the conditions of this project approval, the requirements of this project approval prevail.		
<b>G10</b>	Any individual turbine that ceases operating for a period of more than 12 consecutive months shall be dismantled within 18 months after the 12 month period.	Compliant	No turbine has ceased operating for more than 12 consecutive months.



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.

