

ANNUAL COMPLIANCE REPORT

EPBC 2013/7026

Uungula Wind Farm



3 August 2024 – 2 August 2025



Final

3 November 2025

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Signature
1	03/11/2025	Final/Issued	S Kidziak	V Chaplin	C Somerville	

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DECLARATION OF ACCURACY

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

Signed**Full name (please print):** Candice Somerville**Position (please print):** Environmental Manager**Organisation:** Squadron Energy**Date:** 03 November 2025

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1 Project Description

Uungula Wind Farm (the Project) is an approved wind farm, located in the Central-West Orana Renewable Energy Zone (REZ), within the Dubbo Regional Council LGA, 14 km east of Wellington, within the NSW Central West.

The Project generally consists of the installation, operation, maintenance, and decommissioning of up to 93 Wind Turbine Generators (WTGs) up to 250 m in height, an energy storage facility (ESF), Ancillary Infrastructure and Temporary Facilities, and is estimated to have an installed generating capacity of approximately 400 MW. The Project will connect to the 330 kV transmission line running approximately east-west within the northern part of the Project Site.

The Project was granted State Significant Development Approval (SSD-6687) by the NSW Department of Planning, Industry and Environment (DPIE) in May 2021.

A Modification (SSD-6687-MOD 2) was granted in December 2022, which included the correction of inadvertent and minor errors or misdescriptions of some figures in the Consent following the grant of Modification 1.

The Commonwealth EPBC Approval (EPBC 2013/7026) was granted in August 2021 to Uungula Wind Farm Pty Ltd (ACN 143 399 295). On 8 September 2023, the Approval was transferred to UWF Nominees Pty Ltd (ACN 660 499 221).

The Project has progressing with the Public Road Upgrade Works and remain ongoing. Commencement of Construction occurred on the 28 March 2025, within this reporting period. Works during the reporting period has been limited to establishment of site access and roads, and laydown areas.

This report has been prepared to meet the requirements of Condition 9 of the EPBC 2013/7026, for the reporting period of 3 August 2023 – 2 August 2024.

2 Description of Activities

Activities undertaken at UWF during the reporting period included:

- Road Upgrade works, including;
 - Finalisation of Twelve Mile Road
 - Finalisation of Goolma Road
 - Commencement of Goolma Road and Twelve Mile Road intersection
- Main wind farm site works, includes:
 - Site office, and laydown areas establishment
 - Clearing activities for access road and turbine pads
 - Sediment erosion control
 - Salvage of aboriginal heritage artefacts on the Wind Farm Site
 - Site access pioneering roads
 - Bulk earthworks
 - Turbine foundations detail excavation commenced
 - Concrete batch plant establishment
 - High voltage ancillary infrastructure preparation

3 Compliance Report

Table 1 Compliance report as per the conditions of EPBC Approval 2013/7026

Condition Number	Condition	Compliance status	Evidence/comments
1	Within the Project Site and for the Road Upgrade Area, the approval holder must not clear more than: a. 13.88 ha of Box Gum Grassy Woodland as specified at Annexure C. b. 142ha of potential Koala (<i>Phascolarctos cinereus</i> (combined populations of Qld, NSW and the ACT)) habitat as specified at Annexure C. c. 142 ha of potential Regent Honeyeater (<i>Anthochaera phrygia</i>) foraging habitat as specified at Annexure C. d. 142 ha of potential Swift Parrot (<i>Lathamus discolor</i>) foraging habitat as specified at Annexure C. e. 125.73 ha of potential Superb Parrot (<i>Polytelis swainsonii</i>) foraging habitat as specified at Annexure C.	Compliant	Project clearing limits have been calculated in consultation with BCS to ensure clearance limits are not exceeded. Maximum clearing for Box Gum Grassy Woodland calculated to be 10.9ha. Maximum clearing for potential Koala habitat calculated to be 105.58ha. Maximum clearing for potential Regent Honeyeater calculated to be 105.58ha. Maximum clearing for potential Swift Parrot calculated to be 105.58ha. Maximum clearing for potential Superb Parrot calculated to be 98.67ha. Clearing for the project is progressively recorded. See appendix A – attached clearing tracking and associated shapefiles.
2	The approval holder must, within 6 months of commencement of the action, submit to the department a written statement, specifying: a. what clearing has been, or will be, undertaken as part of the action in relation to each of the clearing limits specified in condition 1; and b. what offsets, calculated and secured in accordance with conditions B21(b) and B22 of the State development consent, will be provided for all Box Gum Grassy Woodland, Koala, Regent Honeyeater, Swift Parrot foraging habitat and Superb Parrot foraging habitat cleared. The statement must be endorsed by an accredited assessor under the Biodiversity Conservation Act, 2016 (NSW) before being submitted to the department and must be published on the website within 20 business days of being submitted to the department.	Compliant	The action commenced on the 11 March 2024. A written statement (endorsed) was submitted to the Department on the 11 September 2024, within the 6 months of commencement. The Statement was endorsed by an accredited assessor under the Biodiversity Conservation Act (Accredited Assessor #18056). The statement was published to the Project website on the 2 October, within 20 business days of being submitted to the department. See appendix B – attached copy of the Statement submitted to the Department.

Condition Number	Condition	Compliance status	Evidence/comments
2A	The biodiversity credits that the approval holder must retire in accordance with condition B22 of the State development consent must address all clearing that will be undertaken as part of this action in respect of Box Gum Grassy Woodland and habitat of Koala, Regent Honeyeater, Swift Parrot and Superb Parrot.	Compliant	In accordance with condition B22 of the State development consent, all biodiversity credits calculated in consultation with BCS, have been retired or paid into the BCF. See appendix C – attached Export of the Biodiversity Offsets Scheme Credit Transactions Register, relating to Uungula Wind Farm, and the Biodiversity Offsets Scheme Credit Transactions Register.
3	The approval holder must comply with conditions A5, A6 and A7 of Part A, B20, B21, B22, B23, B24, B46, B47 and B48 of Part B and C1, C2, C3, C4, C5, C6, C8, C15 of Part C of the State development consent. Conditions C2, C3, C4, C5 and C6 only apply to those plans required under conditions B23, B24, C1 and C8 of the State development consent.	Compliant	The approval holder is maintaining compliance with the noted conditions of the State development consent. See appendix D – attached copy of the Independent Environmental Audit Report, dated 20/06/2025, which shows compliance to each of the listed conditions.
4	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Compliant	The action commenced 11 March 2024. Written notification to the department was submitted 12 March 2024.
5	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Compliant	The action commenced 11 March 2024, within the 5-year period since the date of the Approval.
6	The approval holder must maintain accurate and complete compliance records	Compliant	The approval holder is maintaining accurate and complete compliance records.
7	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request	Compliant	The Department requested evidence of compliance records during September 2024 – December 2024, as part of an EPBC Approval Audit conducted by DCCEEW. Records were provided as requested, and a final Audit Report was Issued on the 4 December 2024. The findings included compliance with 11 out of 18 conditions of approval; the remaining 7 were deemed not applicable at the time of the audit.

Condition Number	Condition	Compliance status	Evidence/comments
8	The approval holder must: - submit plans electronically to the Department. The plans required are those specified under conditions B23, B24, C1 and C8 of the State development consent; - unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date that the plan was approved by the NSW Planning Secretary, if the plan requires the approval of the NSW Planning Secretary. - keep the most recent versions of plans published on the website for the period for which this approval has effect	Compliant	In accordance with the requirements of the State development consent, the following plans have been approved by the NSW Planning Secretary, within the Reporting Period: Environmental Management Strategy (EMS) (C1), approved by the NSW Planning Secretary on 20 June 2025. The EMS was published on the website on 9 July 2025. The EMS was submitted to the Department electronically, via email, on 11 September 2025.
9	The approval holder must prepare a compliance report addressing compliance with each of the conditions of this approval, including implementation of any management plans and strategies from the State development consent that are referred to in this approval, every calendar year on the anniversary of the date of this approval, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: - publish each compliance report on a website within 3 months following the relevant 12- month period - notify the Department by email that a compliance report has been published on the website and provide the website's link for the compliance report within five business days of the date of publication - keep all compliance reports publicly available on the website until this approval expires	Compliant	The 2023-2024 Compliance Report was published to the website on 18 October 2024. An email was sent to the Department on the same day notifying of compliance. See appendix E – attached copy of the notification to the Department, and the acknowledgement of receipt. This Compliance Report has been prepared in relation to the twelve-month period between 3 August 2024 to 2 August 2025. This Compliance Report will be published on the Project website within 3 months of the Anniversary date 3 August 2024 (i.e. by 3 November 2025). Within 5 business days of publishing this Compliance Report online, the Department will be notified by email in accordance with this Condition.
10	The approval holder must notify the Department in writing of any: incident, or non-compliance with the conditions, or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: - any condition which is in breach - a short description of the incident and/or non-compliance - the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available	Not applicable	There has been no incident or non-compliance recorded with the conditions of this approval, during the reporting period.

Condition Number	Condition	Compliance status	Evidence/comments
11	The approval holder must provide to the Department the details of any incident or noncompliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future. b. the potential impacts of the incident or non-compliance. c. the method and timing of any remedial action that will be undertaken by the approval holder.	Not applicable	There has been no incident or non-compliance recorded with the conditions of this approval, during the reporting period.
12	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister	Not applicable	The Minister has not made a request for any independent audit to be undertaken during the reporting period.
13	For each independent audit, the approval holder must: a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department. b. only commence the independent audit once the audit criteria have been approved in writing by the Department. c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Not applicable	During the reporting period, no independent audit was requested by the Minister. As a result, no independent audit has been completed within this timeframe.
14	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not applicable	During the reporting period, no independent audit was requested by the Minister. As a result, no independent audit has been completed within this timeframe.
15	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not applicable	The action had not been completed during the reporting period.
16	The approval holder must notify the Department in writing of any proposed change to the State development consent that may relate to protected matters within 5 business days of formally proposing a change or within 5 business days becoming aware of any proposed change.	Compliant	No proposed changes within the Reporting Period. The approval holder notified the Department of a proposed change to the State development consent (Modification 2) on 23/08/2022. No additional changes relating to protected matters to the Development Consent have been proposed within the reporting period.

Condition Number	Condition	Compliance status	Evidence/comments
17	The approval holder must notify the Department in writing of any change to the State development consent conditions that may relate to protected matters, within 10 business days of a change to conditions being finalised.	Compliant	No proposed changes within the Reporting Period. Modification 2 was approved by the NSW Minister for Planning on 2/12/2022. The approval holder notified the Department of a finalised change to the State development consent (Mod 2) on 8/12/2022. No additional changes relating to protected matters to the Development Consent have been proposed within the reporting period.

4 New environmental risks

During the reporting period, UWF continued with the Public Road Upgrade works, and commenced construction on the 28 March 2025. All activities have been conducted in compliance with approval conditions and aligned with UWF management plans.

No new environmental risks were identified during this reporting period.

5 Report Summary

During the reporting period 3 August 2024 – 2 August 2025, the Project has complied with all applicable conditions of the EPBC Approval 2013/7026.

Appendix A Total cleared areas for each MNES Type

Associated shapefiles have been uploaded to the website

MNES type	Quantity cleared
Box Gum Grassy Woodland	5.465 Ha
Koala habitat, Regent Honeyeater, Swift Parrot	71.597 Ha
Superb Parrot foraging habitat	67.197 Ha

Appendix B Offset Statement



Our Ref: 31368_UungulaWF_Letter_20240910_FINAL_V1

10 September 2024

Sheree Kidziak
Environmental Advisor
Squadron Energy Pty Ltd

E | sheree.kidziak@squadronenergy.com

Dear Sheree

RE: Uungula Wind Farm - Offset Statement (EPBC 2013/7026, Condition 2)

1.0 Introduction

Umwelt has been engaged by the Uungula Wind Farm Project (UWFP) to prepare a written statement (this document) to satisfy the requirements of Condition 2 of EPBC 2013/7026 (the EPBC Act Approval).

This written statement (Offset Statement) presents a overview of impacts to Matters of National Environmental Significance (MNES) associated with clearing of habitat required for the UWFP (Section 3.0).

It has also presents an overview of steps taken by the UWFP calculate offset liabilities and to secure offset credits for MNES in accordance with the State Development Consent (SSD-6687) (Section 4.0).

The relevant EPBC Act Approval and State Development Consent requirements are set out in Section 2.0 below.

The action commenced on 11 March 2024 with the commencement of the Road Upgrade Works. It is noted that with respect to the State Development Consent, the project is still within the pre-construction phase and construction of the project has not yet commenced.

2.0 Overview of Project Approval Requirements

The Conditions of the EPBC Act Approval that are relevant to this Offset Statement, are:

Condition 1

- 1) *The approval holder must not clear outside of the Project Site and the Road Upgrade Area. In accordance with the maximum impact limits specified in Annexure C, the approval holder must not clear more than:*

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- a. 13.88 ha of Box Gum Grassy Woodland;
- b. 142 ha of potential Koala habitat;
- c. 142 ha of potential Regent Honeyeater foraging habitat;
- d. 142 ha of potential Swift Parrot foraging habitat; and
- e. 125.73 ha of potential Superb Parrot foraging habitat.

Condition 2

2) *The approval holder must, within 6 months of commencement of the action, submit to the department a written statement, specifying:*

- a. *what clearing has been, or will be, undertaken as part of the action in relation to each of the clearing limits specified in condition 1;*
- b. *what offsets, calculated and secured in accordance with conditions B21.(b) and B22 of the State development consent, will be provided for all Box Gum Grassy Woodland, Koala, Regent Honeyeater, Swift Parrot foraging habitat and Superb Parrot foraging habitat cleared.*

The statement must be endorsed by an accredited assessor under the Biodiversity Conservation Act, 2016 (NSW) before being submitted to the department and must be published on the website within 20 business days of being submitted to the department.

2A) *The biodiversity credits that the approval holder must retire in accordance with condition B22 of the State development consent must address all clearing that will be undertaken as part of this action in respect of Box Gum Grassy Woodland and habitat of Koala, Regent Honeyeater, Swift Parrot and Superb Parrot*

The conditions B21.(b) and B22 of the State Development Consent are:

Condition B21. (b)

Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must:

- b) calculate the biodiversity offset credit liabilities for the development in accordance with the Framework for Biodiversity Assessment under the NSW Biodiversity Offset Policy for Major Projects, in consultation with BCS, and to the satisfaction of the Planning Secretary.*

Condition B22

Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must retire the biodiversity credits.

The retirement of the credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects, and can be achieved by:

a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016;

b) making payments into an offset fund that has been established by the NSW Government; or

c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme

3.0 Project Clearing Extent – Final clearing calculations (Condition 2a)

Since the EPBC Act Approval and State Development Consent were granted, the UWFP has undergone extensive detailed design which has enabled final clearing impacts to be calculated by UWFP in consultation with the NSW Biodiversity Conservation and Science Directorate (BCS).

With respect to MNES habitats, the final calculated clearing impacts are below the approved maximum impact areas as set out in Annexure C of the EPBC Act Approval. **Table 3.1** displays the maximum amount of habitat to be impacted (per Annexure C of the EPBC Act Approval) and the final clearing impacts as calculated in consultation with BCS.

Table 3.1 MNES – Approved maximum habitat impacts vs Revised habitat impacts

Veg Zone	Plant Community Type (equivalent)	Maximum amount of habitat to be impacted (ha)	Revised MNES impact calculations (ha)				
			Box Gum Grassy Woodland	Koala Habitat	Regent Honeyeater Foraging Habitat	Swift Parrot Foraging Habitat	Superb Parrot Foraging Habitat
1	PCT 277 Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South-Western Slopes Bioregion <i>Moderate/Good_Moderate</i>	6.28	5.47	5.47	5.47	5.47	5.47
3	PCT 1095 Red Stringybark woodland of the dry slopes of the NSW South Western Slopes Bioregion <i>Moderate/Good_Medium</i>	17.39		15.67	15.67	15.67	15.67
5	PCT 1095 Red Stringybark woodland of the dry slopes of the NSW South Western Slopes Bioregion <i>Moderate/Good_Other - Weedy</i>	7.74		6.03	6.03	6.03	6.03
6	PCT 1279 Tumbledown Red Gum - Black Cypress Pine - Red Box low woodland of hills of the NSW South Western Slopes Bioregion <i>Moderate/Good_Moderate</i>	16.27		6.91	6.91	6.91	
8	PCT 274 White Box - Rough-barked Apple alluvial woodland of the NSW central western slopes including in the Mudgee region <i>Moderate/Good_Moderate</i>	7.60	5.43	5.43	5.43	5.43	5.43
10	PCT 270 White Box - Tumbledown Red Gum - Long-leaved Box shrub/grass woodland on fine-grained sediments of the upper Macquarie River gorge, NSW central western slopes <i>Moderate/Good_Moderate</i>	14.56		9.67	9.67	9.67	9.67
12	PCT 270 White Box - Tumbledown Red Gum - Long-leaved Box shrub/grass woodland on fine-grained sediments of the upper Macquarie River gorge, NSW central western slopes <i>Moderate/Good_Other-Grassland</i>	72.16		56.4	56.4	56.4	56.4
Maximum Impact Total			13.88	142.00	142.00	142.00	125.73
Revised Impact Total			10.9	105.58	105.58	105.58	98.67

4.0 Calculation of Biodiversity Offset Credit liabilities (State Condition B21b)

4.1 Overview of the approach to credit liability calculation

The Biodiversity Assessment Report (BAR) prepared by Eco Logical Australia (2020) informed the Uungula Wind farm Environmental Impact Statement (EIS) and was prepared in accordance with the NSW Framework for Biodiversity Assessment (FBA) therefore fell under the savings and transitional arrangements that commenced at the inception of the NSW Governments Biodiversity Conservation Act 2016 (BC Act).

The offset obligations outlined in the BAR were originally calculated using the BioBanking Calculator which determines the Biobanking credit liability for ecosystem and species credit entities impacted by the UWFP.

The UWFP biodiversity impacts were primarily ecosystem credits for native vegetation communities and ecosystem credit species that can be reliably predicted based on vegetation being a surrogate (foraging habitat). Species credits were generated for threatened species that are not reliably predicted to occurred based on the vegetation these were the Koala (*Phascolarctos cinereus*) and Regent honeyeater (*Anthochaera phrygia*).

4.2 Statement of Assessment of Reasonable Equivalence

In 2023, the UWFP made an application to the NSW Department of Planning and Environment (DPE) for a Draft Statement of Assessment of Reasonable Equivalence (Draft SARE). The purpose of the SARE was to convert Biobanking credits to biodiversity credits that have been generated in accordance with the Biodiversity Assessment Method (BAM) credits (BAM credits) under the BC Act. This is necessary, because the UWFP intends to retire BAM Credits (rather than Biobanking Credits) in accordance with Condition B22 of the State Development Consent.

The UWFP has applied to the DPE to prepare a Final SARE, based on the final clearing impact calculations as described in Section 3.0 above. The Final SARE is currently being processed by the DPE, and the UWFP expects to receive the Final SARE in late September 2024.

Table 4.1 outlines the impact areas used in the Draft SARE as well as those used in the Final SARE application.

To ensure the UWFP meets the conditions of approval this Offset Statement has been prepared based on the information available to date. As the accredited assessor, it is acknowledged that the offset liability still needs to be finalised in accordance with Condition B21(b) of the State Development Consent.

The following sections outline the expected offset credit liabilities for each of the MNES based on the final clearing calculations and the application that has been made for the Final SARE.

Table 4.1 MNES Impacts – Draft SARE (2023) and Final SARE application

Veg Zone	Plant Community Type	Impact area per Draft SARE 2023 (ha)	Impact Area per Final SARE application (ha)			Difference (Draft SARE vs Final SARE) (ha)
			Box Gum Grassy Woodland	Koala Habitat, Regent Honeyeater Swift Parrot Foraging Habitat	Superb Parrot Foraging Habitat	
1	277	5.46	5.47	5.47	5.47	+0.01
3	1095	15.74		15.67	15.67	-0.07
5	1095	6.03		6.03	6.03	0
6	1279	6.91		6.91		0
8	274	4.89	5.43	5.43	5.43	+0.54
10	270	9.67		9.67	9.67	-0.01
12	270	56.4		56.4	56.4	0
Total		105.1	10.9	105.58	98.67	N/A

4.3 Box Gum Grassy Woodland – Offset liability

The White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland – CEEC impacts will be offset using the NSW Biodiversity Offset Scheme. Vegetation zones one (1) and eight (8) are the only two zones that conform to the Commonwealth conservation advice criteria for the CEEC.

Table 4.1 sets out the impact areas used in the Draft SARE (2023) and the Final SARE application.

Using the Draft SARE (2023) the 10.35ha of CEEC (zones 1 & 8 only) requires a total of 462 ecosystem credits from the Offset Trading Group (OTG) White Box - Yellow Box - Blakely's Red Gum Grassy Woodland to be retired to extinguish the offset liability under the BC Act.

The Final SARE application has included an additional 0.55ha of impact to the CEEC (bringing the total to 10.9 ha). It is expected that this additional 0.55 ha impact will require a further 24 ecosystem credits to be retired.

On this basis, it is expected that a total of 486 biodiversity credits will need to be retired for Box Gum Grassy Woodland. The final number of biodiversity credits required to meet the Offset relating to the Commonwealth CEEC will be finalised once the Final SARE is received from DPE.

UWFP have secured over 5,000 White Box - Yellow Box - Blakely's Red Gum Grassy Woodland from the private sales of which 3,247 have been secured specifically for the UWFP. These credits have been transferred to UWFP ready for retirement prior to the commencement of construction (estimated early 2025) in accordance with the State Development Consent.

4.4 Swift Parrot, Regent Honeyeater and Superb Parrot – Offset liability

The impacts to foraging habitat for Swift Parrot, Regent Honeyeater and Superb Parrot have been reviewed with consideration to the type of biodiversity credits generated for impacts to foraging habitat. Under the BAM all three of the species are listed as dual credit species. **Table 4.2** provides a summary of when each of the species are considered a species credit or ecosystem credit species.

Table 4.2 Threatened Woodland Bird Species and Ecosystem Credit Species

Species	Threat Status BC Act	Threat Status EPBC Act	Threatened Biodiversity Data collection (TBDC)	Species Credit habitat Constraints
Swift parrot (<i>Lathamus discolor</i>)	Endangered	Critically Endangered	The species is a dual credit species, assessed for species credits (important habitat map) and ecosystem credits (all other areas the species is likely to occur). No survey is required if the subject land is on an important habitat map for a species unless the species profile in the TBDC states otherwise. The species is considered present and the part of the subject land that is within the important habitat map forms the species polygon used to generate species credits (BAM section 5.2.5 Box 2). Any remaining habitat on the subject land, e.g. unmapped locations used by these species is assessed for ecosystem credits	The UWFP is not located within the important habitat map for a species therefore it is considered the species will be offset by ecosystem credits representing foraging habitat
Regent honeyeater (<i>Anthochaera phrygia</i>)	Critically Endangered	Critically Endangered	The species is a dual credit species, assessed for species credits (important habitat map) and ecosystem credits (all other areas the species is likely to occur). No survey is required if the subject land is on an important habitat map for a species unless the species profile in the TBDC states otherwise. The species is considered present and the part of the subject land that is within the important habitat map forms the species polygon used to generate species credits (BAM section 5.2.5 Box 2). Any remaining habitat on the subject land, e.g. unmapped locations used by these species is assessed for ecosystem credits.	The UWFP is not located within the important habitat map for a species therefore it is considered the species will be offset by ecosystem credits representing foraging habitat

Species	Threat Status BC Act	Threat Status EPBC Act	Threatened Biodiversity Data collection (TBDC)	Species Credit habitat Constraints
Superb parrot (<i>Polytelis swainsonii</i>)	Vulnerable	Vulnerable	The species is a dual credit species, assessed for species credits for breeding habitat. Breeding habitat can be identified by the presence of habitat features and observed nest OR two or more birds seen on site. This species is an ecosystem credit species for foraging habitat only.	Breeding habitat was not identified within the UWFP area and the COA relates to impacts of foraging habitat, therefore it is considered the species will be offset by ecosystem credits representing foraging habitat.

As all three threatened woodland birds are considered ecosystem credits species for foraging habitat, only ecosystem credits are required to offset impacts to these entities under the BC Act. Table 4.3 outlines the PCTs and offset trading groups summary of the credits required to offset impacts to the woodland birds.

The BioBanking Calculator used for the BAR generated species credits for the Regent honeyeater. As outlined above under the BAM this species is only a species credits when the impacts occur within areas identified on the important habitat map. As a Draft SARE has been prepared to modernise the credits this species is now only an ecosystem credit in accordance with **Table 4.3**.

Table 4.3 Ecosystem Credits for Woodland Threatened Birds

Plant Community Type	Offset Trading Group	Regent Honeyeater Swift Parrot Foraging Habitat (ha)	Superb Parrot Foraging Habitat (ha)	Ecosystem Credits Required	Ecosystem Credits Secured
277	White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions	5.47	5.47	253	Yes: Private seller and DPE
274		5.43	5.43	233*	
1095	Western Slopes Dry Sclerophyll Forests with percent cleared <50%	15.67	15.67	433	Yes: Private seller and DPE
1095		6.03	6.03	205	
1279	Western Slopes Dry Sclerophyll Forests with percent cleared ≥70% and <90%	6.91	N/A	256	Yes: Private seller and DPE

Plant Community Type	Offset Trading Group	Regent Honeyeater Swift Parrot Foraging Habitat (ha)	Superb Parrot Foraging Habitat (ha)	Ecosystem Credits Required	Ecosystem Credits Secured
274	Western Slopes Grassy Woodlands with percent cleared $\geq 70\%$ and $< 90\%$	9.67	9.67	302	Yes: Private seller and DPE
270	Western Slopes Dry Sclerophyll Forests with percent cleared $< 50\%$	56.4	56.4	1039	Yes: Private seller and DPE

* Includes the additional 23 ecosystem credits required to meet the Box gum grassy woodland obligation

UWFP have secured all required ecosystem credits to meet the woodland bird foraging habitat offset obligation. The final number of biodiversity credits required to meet the Offset relating to Box Gum Grassy Woodland will be finalised once the Final SARE is received from DPE. The credits have been secured from private credit holders and DPE. All ecosystem credits required for the UWFP have been transferred to the proponent and will be retired prior to the commencement of construction, which is likely to be in early 2025.

4.5 Koala – Offset liability

Table 4.4 sets out the koala habitat impact areas as applied within the Draft SARE (2023) and the Final SARE application.

Based on the Draft SARE (2023), the UWFP has secured species credits for 101.35 ha of habitat impact – which equates to 2,725 Koala credits. These credits have been transferred to the proponent and are ready for retirement prior to the commencement of construction (estimated early 2025) in accordance with the State Development Consent.

During preparation of this Offset Statement, the accredited assessor has identified an error within the Draft SARE (2023) with respect to the Koala, whereby the DPE used the incorrect impact areas when calculating the BAM credit requirements for Koala. This has been raised with the DPE and the Final SARE will reflect the final calculated impact area to Koala habitat of 105.58 ha (ie. 4.23 ha more than the Draft SARE).

It is estimated the additional koala habitat impact area of 4.23 ha will require an additional 109 Koala credits. UWFP intend to retire these credits through payment in the Biodiversity Conservation Fund (BCF) once the Final SARE is received.

On this basis, it is expected that a total of 2,834 credits will need to be retired to offset impacts to Koala habitat.

Table 4.4 Koala Habitat Impacts – Draft SARE vs Final SARE

Veg Zone	Plant Community Type	Impact area used in Draft SARE 2023 (ha)	Impact area used in Final SARE application 2024 (ha)	Difference (Draft SARE vs Final SARE) (ha)
1	277	5.44	5.47	+0.01
3	1095	15.08	15.67	+0.59
5	1095	5.77	6.03	+0.26
6	1279	6.58	6.91	+0.33
8	274	5.19	5.43	+0.24
10	270	9.52	9.67	+0.15
12	270	53.77	56.4	+2.63
Total		101.35	105.58	+4.23

5.0 Statement Finalisation

The information provided in this Offset Statement has been reviewed by Adam Cavallaro (accredited assessor BAAS18056). This Offset Statement should be considered an Interim Offset Statement until the Final SARE is received, and the accredited assessor is satisfied the impacts and offsets are final.

All information is a true representation of the offset requirements for the UWFP based on what has been provided by UWFP to the accredited assessor. As noted in this Offset Statement, the UWFP are waiting to receive a Final SARE from DPE, which is expected to be issued in late September 2024. This Offset Statement will be reviewed at the time of receiving the Final SARE and updated to reflect any changes that may be required to ensure impacts to MNES are offset in accordance with the BC Act, and in accordance with the requirements of the State Development Consent Conditions B21(b) and B22.

Any updated Offset Statement will be supplied to the Commonwealth Department Climate Change Energy the Environment and Water (Cth DCCEEW).



Adam Cavallaro
Principal Ecologist
Accredited Assessor #18056

Appendix C Export of the Biodiversity Offsets Scheme Credit Transaction Register

Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation

Pursuant to section 6.33 of the *Biodiversity Conservation Act 2016*, the NSW Biodiversity Conservation Trust confirms that the following payments have been made into the Biodiversity Conservation Fund under section 6.30(1) of the Act to satisfy an obligation to retire biodiversity credits.

Payment made by		UWF Nominees Pty Ltd			
Date received		18 December 2024			
NSW statutory obligation reference ¹		SSD 6687			
Commonwealth EPBC Act controlled action reference (if applicable) ²		EPBC 2013/7026			
BCT Reference		BCF815			
Biodiversity credit retirement obligations satisfied by payment to the Biodiversity Conservation Fund:					
Biodiversity credit type (Credit ID and name)	Offset trading group	EPBC Act Controlled Action offset obligation (Y / N)	Number of credits	Cost per credit (Exc. GST)	Total payment per credit type (Exc. GST)
270 - White Box - Tumbledown Red Gum - Long-leaved Box shrub/grass woodland on fine-grained sediments of the upper Macquarie River gorge, NSW central western slopes	Western Slopes Dry Sclerophyll Forests <50%	N	344	\$ [REDACTED]	\$ [REDACTED]
10616 - <i>Phascolarctos cinereus</i> (Koala)	Phascolarctos cinereus (Koala)	Y	8	\$ [REDACTED]	\$ [REDACTED]
Total (Exc. GST)					\$ [REDACTED]
GST					\$ [REDACTED]
Total (Inc. GST)					\$ [REDACTED]



Emily McCosker 20/12/2024

Director Strategy & Finance

¹ This refers to either; a development application number for a development consent under Part 4 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**), a State significant infrastructure approval under the previous Part 5.1 (now Part 5, Division 5.2) of the EP&A Act, a decision of a determining authority to carry out or approve the carrying out of an activity under Part 5 of the EP&A Act, or a biobank statement number or biodiversity certification number.

² This refers to a controlled action under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* for which a biodiversity offset obligation has been met through payment into the BCF.

Transaction Date	Transaction ID	Transaction Status	Transaction Type	From	To	Plant Community Type	Sub Region	Offset Trading Group	Vegetation Formation	Scientific Name	Common Name	Number Of Credits	Price Per Credit (Ex-GST)	Retirement Reason	Reference Number of Obligation	Address of Obligation	Local Government Area of Obligation	Date of Consent Approval
2024-12-06	53617	Completed	Retire	CR-41682	CR-42611	Black Cypress Pine - Narrow-leaved Ironbark - red gum +/- White Bloodwood shrubby open forest on hills of the southern Pilliga, Coonabarabran and Garawilla regions, Brigalow Belt South Bioregion	Pilliga	Western Slopes Dry Sclerophyll Forests <50%	Dry Sclerophyll Forests (Shrubby sub-formation)			1000	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-42398	CR-42612	Mugga Ironbark - Red Box - White Box - Black Cypress Pine tall woodland on rises and hills in the northern NSW South Western Slopes Bioregion	Inland Slopes	Western Slopes Dry Sclerophyll Forests >=90%	Dry Sclerophyll Forests (Shrubby sub-formation)			23	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-42515	CR-42613		Karuah Manning			Phascolarctos cinereus	Koala	300	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-35044	CR-42610	Black Cypress Pine - Red Stringybark - red gum - box low open forest on siliceous rocky outcrops in the NSW South Western Slopes Bioregion	Hill End	Western Slopes Dry Sclerophyll Forests <50%	Dry Sclerophyll Forests (Shrubby sub-formation)			3472	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-30845	CR-42606		Karuah Manning			Phascolarctos cinereus	Koala	1500	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-33220	CR-42607		Karuah Manning			Phascolarctos cinereus	Koala	1059	0	For the purpose of complying with a requirement to retire	SSD 6687	Uungula Wind Farm approximately 14km east of	Dubbo Regional Council	2021-05-07

														biodiversity credits of a planning approval or a vegetation clearing approval		Wellington NSW 2820		
2024-12-06	53617	Completed	Retire	CR-35042	CR-42608	White Box - Tumbledown Red Gum - Long-leaved Box shrub/grass woodland on fine-grained sediments of the upper Macquarie River gorge, NSW central western slopes	Hill End	White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Ri	Dry Sclerophyll Forests (Shrubby sub-formation)			882	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07
2024-12-06	53617	Completed	Retire	CR-35043	CR-42609	White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion	Hill End	White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Ri	Grassy Woodlands			3879	0	For the purpose of complying with a requirement to retire biodiversity credits of a planning approval or a vegetation clearing approval	SSD 6687	Uungula Wind Farm approximately 14km east of Wellington NSW 2820	Dubbo Regional Council	2021-05-07

Appendix D Independent Environmental Audit Report



Healthy Buildings International

INITIAL INDEPENDENT AUDIT NO. 1 (IA1)

AUDIT REPORT

Uungula Wind Farm

SSD 6687

JUNE 2025

Authorisation

Author name	Maulik Bapodara
Author position	Lead Auditor
Author signature	
Date	18/07/2025

Document Revision History

Revision	Date	Details
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3.0		

Report Name: Initial Independent Audit No. 1 – Audit Report, Ungula Wind Farm

Project No.: 241116

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EXECUTIVE SUMMARY

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with an audit site inspection on 20 June 2025 of the Uungula Wind Farm – SSD 6687.

This audit is the Initial Independent Audit (IA1) conducted for the Project; the temporal period covered by the audit is from the date of commencement of construction on 31 March 2025 to the date of the audit site inspection on 20 June 2025 and as described within this report.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSD 6687 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan, sub-plans and associated Procedures. Specifically, this audit was required to satisfy Condition C15 of SSD 6687 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

In summary, a total of **86 conditions** were assessed, one self-reported non-compliance was noted (outside the audit period), and four observations (opportunities for improvement) were identified during this Audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of the Audit Scope. The level of implementation of these requirements was also observed as high.

The Auditors would like to thank the Auditees from Squadron Energy (the Proponent) and Nacap Pty Ltd (Construction Contractor) for their organisation, cooperation and support during the conduct of the audit.

1. INTRODUCTION

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on 20 June 2025 of the Uungula Wind Farm Project under State Significant Development (SSD) 6687.

This audit is the first Independent Audit conducted for the Project and has been conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

1.1 The Project

1.1.1 Overview

Uungula Wind Farm Pty Ltd submitted a State Significant Development (SSD) application to construct and operate the Uungula Wind Farm project under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Minister's Conditions of Approval (MCoAs) were issued for the State Significant Development (SSD) Project No 6687 Uungula Wind Farm on 7 May 2021 (UWF Planning Approval).

The Project is located in the Dubbo Regional Council Local Government Area (LGA), within the Central West and Orana region of NSW. Refer Figure 1 for Project location and context.

The key features of the Project include:

- Up to 93 wind turbines, associated infrastructure and associated turbine hardstands and crane hardstand areas
- Battery Energy Storage System of up to 150 MW / 150 MWh
- Connection to TransGrid's existing 330 kV Transmission line that traverses the northern part of the project site and up to 3 substations
- Temporary and permanent ancillary infrastructure on site to facilitate the construction and operation of the turbines
- Temporary facilities, including site offices and compounds, rock crushing and concrete batching plant, stockpiles and materials
- Upgrades to several local and regional roads to cater for construction
- Traffic and enable turbines to be delivered to the site using over dimensional vehicles and delivery of oversize and over mass (OSOM) components
- Electrical infrastructure including 12 km of external overhead transmission lines, connecting to TransGrid's existing Wellington to Wollar 330 kV transmission line which traverses the northern part of the site, two operations and maintenance compounds
- Utility services and signage
- Substation



1.1.2 Changes to the Project

Project Approval SSD 6687 for the Project was issued on 7 May 2021.

Modifications

The Project Approval has been modified (outside this audit period) with the details of modifications summarised below:

- **Modification 1 (SSD 6687 Mod 1) determined on 21 April 2022:** The modification included removal of turbines and changes to site layout.
- **Modification 2 (SSD 6687 Mod 2) determined on 2 December 2022:** The modification included update to subdivision plans.

Further detail on the approved modifications are available on the NSW planning portal.

Consistency Assessments

There were no Consistency Assessments determined and approved by the Proponent within this audit period.



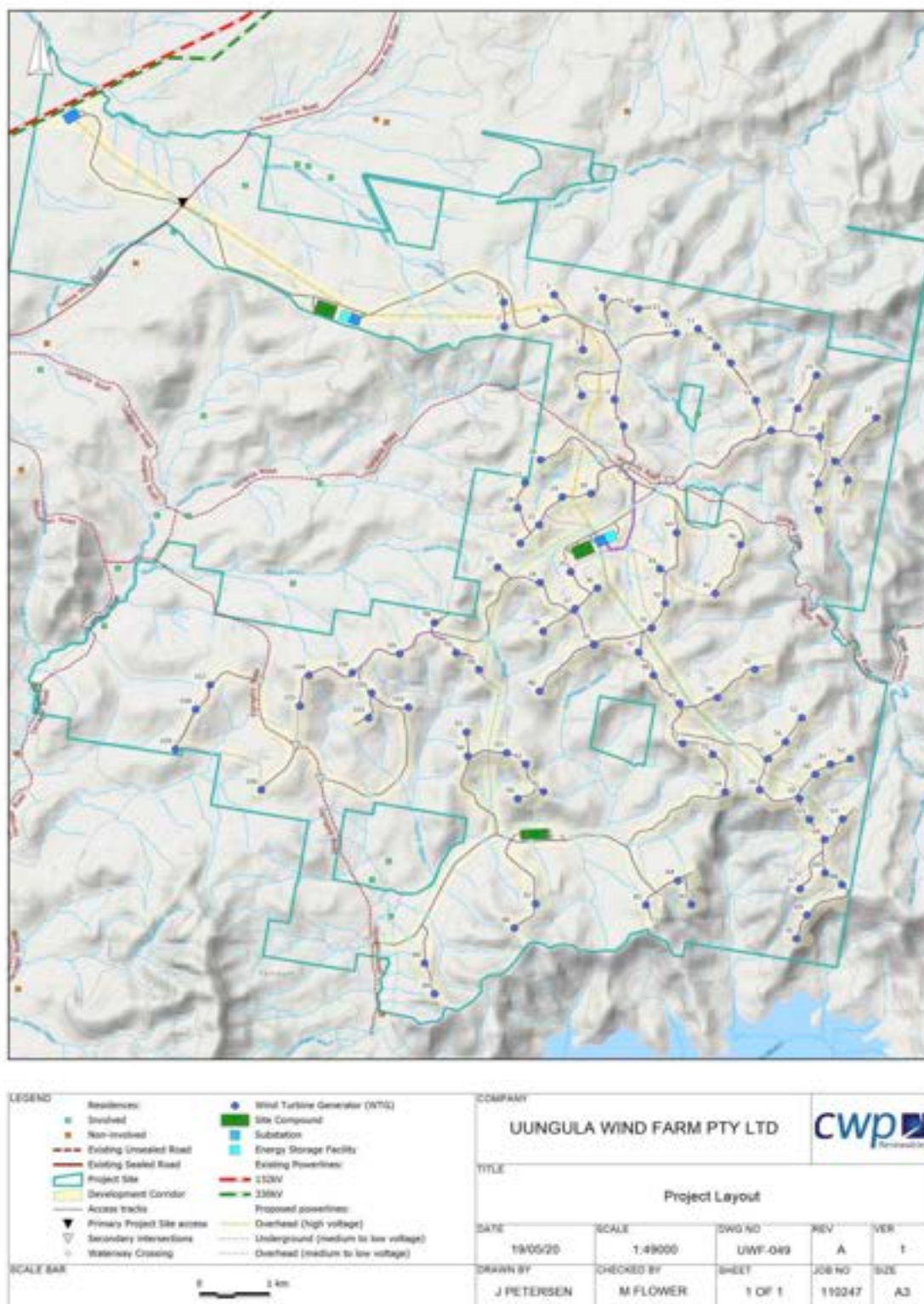


Figure 1: Project Location and Context (Source: Project layout (indicative), Environmental Impact Statement)



1.1.3 Staging

The Project's staging is detailed in Section 1.2 of the Environmental Management Strategy (Revision 004, dated 19 June 2023) approved by DPHI (dated 27/06/2023), which states below:

"The Project will be developed in two stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Energy Storage System (BESS)'.
- Stage 2: Battery Energy Storage System (BESS).

In accordance with Condition C3 of SSD-6687, the Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2."

Stage 1 is the subject of this audit.

1.1.4 Works conducted during the audit period

As per the notification letter to DPHI from the Proponent (dated 28 March 2025), and DPHI's response to the Proponent (dated 1 April 2025), the construction commencement date for the Project is 31 March 2025. Construction related activities completed during the audit period are summarised below as detailed in the Project Monthly Reports:

- March 2025
 - Bypass track installed at chainage (CH) 10835, with erosion embankment protection completed
 - Culvert variation works completed at CH3775, CH8025, and CH12575 and works commenced at CH8200, CH10835, and CH11915
 - Road bitumen sealing and line marking were completed, along with the installation of road furniture and signage
- April 2025
 - Continuation of pre-construction minor works - Access approved in Civil Area 01 (Property) during the reporting period
- May 2025
 - Civil Area 01 – advancement in cut to fill activities
 - Formation of Track number 1-1 towards Uungula Road
 - Topsoil removal and advancements in cut to fill activities in Civil Area 3 around Wind turbine 30 and 32 with clearing works and track benching
 - Track benching towards Civil Area 02
 - Completion of Twelve Mile Road upgrade works
 - Commencement of site compound relocation



1.2 Audit team

In accordance with Condition of Approval (CoA) C15 of SSD 6687, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; with the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Endorsement of the audit team was provided by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 16 December 2024. The endorsement is presented in **Appendix B**. Table below presents the audit team endorsed for this first Independent Audit on the Project and the Lead Auditor's declaration is presented in **Appendix F**.

Table 1 Audit Team

Name & Position	Company	Audit Role	Certification
Maulik Bapodara	Healthy Buildings International Pty Ltd (HBI)	Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-462181)
Swathi Gowda	Healthy Buildings International Pty Ltd (HBI)	Audit Support	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)

1.3 Audit objectives

This first Independent Audit is to satisfy CoA C15 (refer below) of the State Significant Development (SSD) 6687 planning approval for the Project, which states:

Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.

This first Independent Audit (IA1) aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

The audits would be conducted at least as frequently as specified in Table below:

Table 2 Construction Audit Frequency (IAPARS, May 2020)

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent audit or as otherwise agreed by the Secretary

In order to meet the above, the audit site inspection commenced on 20 June 2025.



1.4 Audit scope

The first Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance and Reporting. The scope of the first Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified; the Approval) Schedule 1, Parts A, B, C and Appendices 1 to 9, in particular those conditions and requirements which are applicable to the stage of the Project (i.e. since construction commencement on 31 March 2025)
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Construction Environmental Management Plans and Sub-plans established in relation to construction
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level assessment of whether Environmental Management Plans and Sub-plans established in relation to construction are adequate and
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

1.5 Audit period

The temporal period covered by the audit is from the date of commencement of construction on 31 March 2025 to the date of the audit site inspection on 20 June 2025. 31 March 2025 is the date of commencement of construction, as per the notification letter from the Proponent to DPHI (dated 28 March 2025) available on Major Projects website, and letter from DPHI to the Proponent (dated 1 April 2025).



2. AUDIT METHODOLOGY

2.1 Audit process

The first Independent Audit was conducted in a manner consistent with the below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (DPIE, 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.2 Audit process detail

2.2.1 Audit initiation and scope development

The Auditee organisations (together referred to as the Auditee/s or construction team) were identified as follows:

- Squadron Energy (the Proponent); and
- Nacap Pty Ltd (Construction Contractor)

Personnel representing the Auditees are identified in Section 2.2.3 of this first Independent Audit Report. Prior to the commencement of the audit the following tasks were completed:

- Confirmation with DPHI on agreed audit team;
- Consultation with DPHI on the audit scope; and
- Development of an Audit Plan detailing the audit objectives, scope, audit period and indicative audit program.

The Lead Auditor consulted with DPHI on 7 April 2025 to obtain inputs to the scope of this first Independent Audit in accordance with Section 3.2 of the IAPARs.

DPHI responded on 10 April 2025 with key issues, focus areas and further requests to consult with other agencies. A summary of the key issues and areas of focus raised by DPHI and other agencies is presented in Table 3. Consultation records are presented in **Appendix D**.



Table 3 Key issues and areas of focus raised during stakeholder consultation

Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
DPHI	Scope consultation correspondence sent to DPHI on 7 April 2025. DPHI responded on 10 April 2025 with the following: • <i>“Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.</i> • <i>Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.</i> • <i>A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.</i> • <i>Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.</i> • <i>Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.</i> • <i>Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met</i> • <i>Details of the works that have been undertaken so far at the Project.</i> • <i>Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.</i> • <i>If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.</i> • <i>Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilgingery Road.</i> • <i>Are accurate records are being kept, specifically in relation to community complaints and actions.</i> <i>In regard to consultation with other agencies, please consult with the following:</i> <i>Local Council – Dubbo Regional Council</i> <i>Environment Protection Authority</i>	The details of the specific elements of DPHI’s requests are provided in Table 8 of this Audit Report.



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	c. Transport for NSW d. NSW DCCEEW CPHR e. Heritage NSW f. Water Group of DCCEEW g. NSW Rural Fire Service h. Community Consultative Committee Please ensure you append this email to the Audit Report. The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met. Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus, the NSW Planning's expectation is the auditor is to attend the site inspection. The IAPARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise)."	
Dubbo Regional Council	Scope consultation correspondence sent to Dubbo Regional Council on 15 April 2025. Dubbo Regional Council responded on 6 May 2025 with following comments: • "The sub-contractor to the Applicant, Wellington Sand and Soil, is utilising Wuuluman Road (unformed Road) creating serious dust pollution (B16) and damaging the road (B32) without maintaining it. Council has received complaints about the above that have also been reported to the Applicant who appears to not have taken any action. • Council notes that road works are under construction in accordance with Condition (B30) and noting Appendix 7 – Schedule of Road Upgrades, at the Goolma Road and Twelve Mile Road intersection: ○ Design and construct a new intersection with a channelised right (CHR) turn lane and an Auxiliary Left (AUL) turn lane treatment; and ○ Permanently remove and close the existing intersection. • Condition A14 requires the Applicant to enter into a VPA in accordance with Appendix 3. The applicant has entered into a Planning Agreement with Council which can be found on Council's website. As such, Condition A14 has been satisfied.	The details of the specific elements of Dubbo Regional Council requests are provided in Table 8 of this Audit Report.



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	<i>A recent inspection of the site did not indicate that any turbines have been constructed. Should the audit find turbines have been constructed, the applicant would be required to pay the relevant amount to Council."</i>	
Heritage NSW	Scope consultation correspondence sent to Heritage NSW on 15 April 2025. Heritage NSW responded on 13 May 2025 requesting the following: • <i>"In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the following as key matters for consideration:</i> ○ <i>Condition B25 requires that the Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. In accordance with this condition Section 3.1 of the approved Heritage Management Plan (HMP, dated 19 July 2024) outlines specific measures to be implemented to ensure no harm, including demarcation as exclusion zones via fencing and/or signage and identification of exclusion zones on site plans. As per table 1 of the Conditions of consent this specifically includes avoidance and protection of the following Aboriginal sites:</i> - <i>UWF SU49/L1 (AHIMS 36-5-0184)</i> - <i>UWF SU32/L1 (AHIMS 36-5-0174)</i> - <i>UWF SU96/L6 (AHIMS 36-5-0329)</i> ○ <i>As per Condition B26(c), Section 3.4 of the approved HMP requires that all site personnel undergo site induction training in relation to Aboriginal heritage and historic heritage and that records of heritage inductions will be kept. Evidence of the records or these inductions should be sought to confirm that this requirement has been met.</i> ○ <i>Section 3.1 of the approved HMP requires that where Aboriginal artefact locales will be impacted, an Aboriginal Site Impact Recording Form (ASIRFs) will be completed and submitted to Heritage NSW within six (6) months from the commencement of the activity. Evidence should be sought to confirm that ASIRFs have been submitted for sites subject to approved harm within six (6) months of that harm. Note that harm also includes management activities such as salvage under an</i> ○ <i>approved HMP.</i> ○ <i>In accordance with Condition B25, Section 3.2.1 of the approved HMP outlines that, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6 (of the Development Consent), the Applicant must salvage and relocate the item/s that would be</i>	The details of the specific elements of Heritage NSW requests are provided in Table 8 of this Audit Report.



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	<i>impacted to a suitable alternative location. Section 3.2.1 outlines the steps that must be followed including the post-salvage reporting and consultation requirements. Where any salvage has occurred under the HMP, evidence should be sought that the process complied with the procedure outlined in Section 3.2.1 of the HMP including evidence that the salvage report has been provided to the proponent, relevant agencies and RAPs.</i> ○ <i>Section 4.1 of the approved HMP commits to submitting ASIRFs to Heritage NSW (i.e. the Aboriginal heritage Information management system; AHIMS) for all sites impacted during construction. Evidence should be sought to confirm that this has been undertaken, where applicable."</i>	
Transport for New South Wales (TfNSW)	Scope consultation correspondence sent to TfNSW on 15 April 2025. TfNSW responded on 5 May 2025 requesting following matters to be considered within the audit: • <i>Review of the current operation of the Goolma Road and Twelve Mile Road intersection and compliance with the agreed secretary approval dated 23 November 2023.</i> • <i>A construction compound is being used at the intersection of Goolma Road and Twelve Mile Creek. TfNSW request information of how this was agreed to.</i> • <i>Compliance with the requirements of the Traffic Management Plan</i> • <i>Compliance with conditions of consent particularly Part B conditions B27 to B33.</i>	The details of the specific elements of TfNSW requests are provided in Table 8 of this Audit Report.
Water Group of DCCEEW	Scope consultation correspondence sent to Water Group of DCCEEW on 15 April 2025. Water Group of DCCEEW responded on 17 April 2025 with a request that the audit address compliance with the following specific elements of consent conditions and related legislative requirements in a manner that is consistent with the audit scope: • <i>"The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include Water Management Plans and related sub-plans e.g., Site Water Balance, ERSED Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.</i> • <i>Extraction Plans and related sub-plans e.g, Water Management Plan, Subsidence Management Plan</i> • <i>The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be</i>	The details of the specific elements of the Water Group of DCCEEW requests are provided in Table 8 of this Audit Report.



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	<i>reported on within annual and exceedance-based reporting.</i> • <i>Water supply availability is clearly defined for the project</i> • <i>Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018</i> • <i>Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant</i> • <i>Water Access Licence/s used to account for water take by the project nominates the work where water is being taken from</i> • <i>Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compare results with previous years, and 3) identifies exceedances and how these are managed/mitigated."</i>	
New South Wales Environmental Protection Authority (NSW EPA)	Scope consultation correspondence sent to NSW EPA on 15 April 2025. NSW EPA responded on 28 April 2025 confirming no comment to provide for this request.	Not Applicable
New South Wales Department of Climate Change Energy Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation Group (CPHR)	Scope consultation correspondence sent to NSW DCCEEW CPHR on 15 April 2025. NSW DCCEEW CPHR provided the following feedback in relation to the audit scope on 16 April 2025 noting the brief for the first independent audit and no further issues to be addressed.	Not Applicable
New South Wales Rural Fire Service (NSW RFS)	Scope consultation correspondence sent to NSW RFS on 28 April 2025. NSW RFS verbally confirmed over the phone to the Lead Auditor that there was no additional feedback or request to be made regarding the first independent audit by NSW RFS.	Not Applicable
Community Consultative Committee (CCC)	Scope consultation correspondence sent to CCC chair on 15 April 2025. The Chair of CCC confirmed on 23 May 2025 that there was no feedback (or comments) received from the members of the CCC.	Not Applicable

2.2.2 Preparing audit activities

The Lead Auditor performed a document review, prepared an Audit Plan with an indicative program and prepared an Audit Table (refer **Appendix A**) for this Independent Audit. The proposed audit plan was provided to the Proponent on 20 April 2025 (refer **Appendix C**), in preparation for the Audit.



2.2.3 *Personnel involvement*

Table 4 presents the involvement of key personnel representing the Auditees in this first Independent Audit.

Opening and closing meeting attendance is presented separately in **Appendix C**.



Table 4 Key personnel involved

Organisation	Project Stage	Position Title	Name	Involvement
Squadron Energy	Stage 1	Environmental Advisor	Cindy Smith	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
Squadron Energy	Stage 1	Senior Environmental Advisor	Vince Chaplin	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
Squadron Energy	Stage 1	Project Manager	Malcolm McPhan	Opening meeting (refer Appendix C Attendance)
Squadron Energy	Stage 1	Site Representative	Malcolm Moore	Opening/closing meetings (refer Appendix C Attendance), audit interview
Squadron Energy	Stage 1	Contracts Administrator	Kerstie Moore	Audit interview
Nacap Pty Ltd	Stage 1	Land Environment and Cultural Heritage Manager	Shaun Smith	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
Nacap Pty Ltd	Stage 1	Land Environment and Cultural Heritage Advisor	Peter Stewart	Audit interview
Nacap Pty Ltd	Stage 1	Land Environment and Cultural Heritage Advisor	Paul Jonauskas	Audit interview



2.2.4 Meetings

Opening and closing audit meetings were held, as follows:

- Opening meeting: 20 June 2025
- Closing meeting: 20 June 2025

Opening and closing meeting attendance is presented in **Appendix C**.

2.2.5 Site inspection

An audit site inspection was conducted on 20 June 2025 as part of this first Independent Audit by the Lead Auditor. During the site inspection the weather conditions were generally cold and sunny, with the daytime temperature ranging from approx. -2.1°C to 17°C. No rainfall was recorded in the week prior to the site inspection. Rainfall was recorded in the last three months - 48mm in May 2025, 57mm in April 2025 and 53mm in March 2025 as per Bureau of Meteorology (BOM) records. The following sites were visited during the audit site inspection:

- Civil Area (CA) 1
- Civil Area (CA) 8

Site inspection observations and photographs are presented in **Appendix E**.

2.2.6 Document review and interviews

The first Independent Audit included investigation and review of documents, reports and records to evaluate compliance. Interviews with key Project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees during the course of the audit.

Refer to Section 2.2.3 for details on the personnel interviewed. Audit interviews and document review sessions were conducted with the Auditees as follows:

- Auditees: 20 June 2025 (face-to-face)

The documents sighted are included in the **Appendix A**.

In addition to the above, the Auditors requested further information to obtain evidence that was not accessible or available during the audit interviews and document reviews. These requests were provided promptly by the Auditees within required timeframes.

2.2.7 Generating audit findings

Independent Audit findings were based on verifiable evidence collected and reviewed. The evidence typically included:

- Relevant correspondence from DPHI and any other stakeholders



- Review of relevant records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspections of relevant locations, activities and processes
- Monitoring data and/or analysis
- Other applicable approvals, permits, records or Project-specific environmental requirements (as documented within the Audit Table in Appendix A).

2.2.8 Compliance evaluation

Evaluation of compliance has been carried out in accordance with Section 3.7 of the IAPARs and documented in an Audit Table, which includes the conditions of SSD 6687. The compliance status of each compliance requirement in the Audit Table has been determined using the relevant descriptors in Section 3.8, Table 2 of the IAPARs, as listed in Table, below:

Table 5 Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

As part of this first Independent Audit evaluation, the Lead Auditor has made observations and notes to provide context, identify any opportunities for improvement (OFI) in relation to any compliance requirement or any other aspect of the Project. This includes any positive observations where the project has applied initiatives beyond compliance requirements.

The compliance status has been attained by assessing a representative sample of documents, records and data for each requirement in the audit period prescribed. Observations on-site during the audit site inspections are based on current activities and assumed to be representative of the auditee's performance across the Project.

2.2.9 Evaluation of post audit approval documentation

The Lead Auditor reviewed and assessed whether post approval documents relevant to the applicable Stage:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate and



- have been implemented in accordance with the conditions of consent for the Project

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document or
- whether there are any opportunities for improvement.

2.2.10 *Completing the audit*

A draft of the first Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. The audit findings have been determined independent of the Auditees, DPHI and any other parties, based on the evidence assessed during the audit.



3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed as part of the audit are listed below. This list is not exhaustive. The full set of documents and relevant evidence sighted against each requirement is detailed within the Audit Table (refer **Appendix A**).

- Environmental Impact Statement, prepared by Eco Logical Australia Pty Ltd Final-RevA dated 20/05/2020
- Response to Submissions v01 dated 09/11/20
- Modification Report 1 dated 17/03/2022
- Modification Report 2 dated 06/10/2022
- DPHI letter to the Proponent dated 15/03/2022 of approval to submit the plans on a staged basis per the request.
- Notification of commencement of construction – letter from the Proponent to DPHI dated 28/03/2025 and DPHI response to the Proponent dated 1/4/2025
- Overarching construction program
- Details of works undertaken dated 6/6/2025
- Nacap Construction Environmental Management Plan rev 02 dated 30/05/2025
- UWF-NACAP-CIV-PLN-0010_1 - Environmental Management Plan - Pre-Construction Works and Public Road Upgrades (3) rev 01 dated 31/10/2024
- UWF-NACAP-CIV-PLN-0027_7 Clearing and Measurement Plan rev 7 dated 18/03/2025
- UWF-NACAP-EHS-PLN-0006 [2] Environmental Management Plan dated 30/05/2025
- UWF-NACAP-EHS-PLN-0011 [A] Drill and Blast Management Plan dated 23/03/2025
- UWF-NACAP-MAN-PLN-0004_A - Construction Traffic and Access Management Plan (1) dated 29/10/2024
- Voluntary planning agreement – Dubbo Regional Council dated 20/12/2021
- Final Layout Plan v2 dated 7/11/2023
- UWF Environmental Management Strategy rev 004 dated 19/06/2023, DPHI approval on 27/06/2023
- Biodiversity Management Plan rev 005 dated 31/08/2023, DPHI approval on 22/09/2023
- UWF Bird and Bat Adaptive Management Plan rev 6a dated 26/02/2024
- UWF Emergency Management Plan v02 dated 16/12/2024, DPHI approval of rev 01 on 22/06/2022
- UWF Heritage Management Plan v005 dated 19/07/2024, DPHI approval on 06/09/2024
- UWF Traffic Management Plan v005a dated 27/03/2025, DPHI approval on 28/03/2025
- UWF Accommodation and Employment Strategy rev0 dated 09/06/2023



- Pre-Construction Road Dilapidation Report v1 dated 17/11/2022
- Complaints register 2024-2025 as of 13/06/2025
- Department Approval of OOHW – Ilgingery Road upgrades dated 06/11/2024
- Department Approval of OOHW – Twelve Mile Road upgrades dated 07/11/2024
- Community Consultative Committee (CCC) Meeting Minutes between 25/02/2013 and 22/05/2025
- Community Newsletters dated May 2024, October 2024 and December 2024
- Erosion and sediment control plans prepared and implemented by the construction contractor as evident during the site inspection on 20 June 2025
- Water access licences (dated 05/06/2008, 1/12/2020, 10/09/2014, which were outside the audit period)
- Water meter records (dated 01/05/2025 and 06/06/2025)
- Water supply work and water use approval dated 01/07/2004 and expiry 28/03/2028 (outside the audit period)
- Pre and post rain inspection records prepared by the construction contractor (dated 15/05/2025)
- Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024
- DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024
- DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024
- Non-compliance in relation to CoA B9 record (outside the audit period) dated 28/01/2025. Report to DPHI on 29/01/2025 and DPHI response to the Proponent via a letter dated 10 April 2025
- Pre-clearance checklist dated 29/05/2025 for Civil Area 2 prepared and implemented by the Construction Contractor
- Pre-construction commencement checklist (hold point release) dated 29/04/2025 prepared and released by the Construction Contractor
- Revised offsets liability request was made by the Proponent to DPHI on 19/05/2023 and was accepted by DPHI on 15/06/2023.
- Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 20/12/2024
- GDA2020_UWF_RegionalVegMapping_v2 – updated Baseline Vegetation Mapping
- Biodiversity Offset Credit Liability dated 17/01/2025
- Final Salvage Report including ASIRFs - Ozark Environment and Heritage dated 24/01/2025
- Project Monthly Reports – February 2024, March 2025 and May 2025
- Weekly Inspection Checklist – NACAP
- Toolbox Talks regarding ERSED



- Weekly Staff Meeting dated 26/05/2025
- IVMS Road Use – geofencing data map
- Road Dilapidation Report v1.0 dated 17/11/2022
- National Reconciliation Week Toolbox Talk, and attendance records dated 31/5/2025
- Dewatering Permit for batch plant at Pad Road dated 4/6/2025
- Post rain inspection report dated 28/5/2025
- Weed Hygiene Register
- Weed Hygiene Declaration form dated 8/6/2025
- Incident Report – Minor diesel spill dated 29/01/2025
- Incident Report – Minor hydraulic oil spill dated 10/1/2025
- Incident Report – Property damage and minor diesel spill dated 8/1/2025

3.2 Non-compliances and Observations

This Section presents findings from the first Independent Audit. A summary of conditions assessed and compliance status from the first Independent Audit is presented in Table 6. Detailed audit findings and evidence against each requirement is presented in the Audit Table (refer **Appendix A**).

Table 6 Summary of conditions assessed and compliance status from the first Independent Audit

Part of the Project Approval	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	22	16	0	6
Part B	48	32	1 (recorded against CoA B9 outside the audit period)	15
Part C	16	12	0	4
Total	86	60	1	25

With respect to this first Independent Audit:

- **86** conditions were assessed.
- **One non-compliance** was identified and had been self-reported by the Proponent outside the audit period
- **60** conditions were considered to be compliant.
- **25** conditions were considered not triggered.

In addition to the above, **four observations (opportunities for improvement)** were identified as detailed in **Table 7**.



Table 7 Initial Independent Audit Findings

Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
1	NC	Non-Compliance	<i>CoA B9 - The Applicant must ensure that the noise generated by any construction or decommissioning activities is managed in accordance with the requirements outlined in the Interim Construction Noise Guideline (DECC, 2009)</i>	The proponent self-reported a non-compliance outside the reporting period on 29/01/2025 regarding the construction contractor (Nacap Pty Ltd) not undertaking noise monitoring in accordance with the Interim Construction Noise Guidelines (ICNG). The non-compliance was identified by the proponent on 28/01/2025 (outside the audit period) and was submitted to DPHI on 29/01/2025 in line with C12.	DPHI response to the Proponent via a letter dated 10 April 2025 was sighted by the Lead Auditor confirming the details within the NCR report submission. The following was sighted by the Lead Auditor: Preventative action: The construction contractor completed internal training on 26/03/2025 related to noise monitoring. An audit has been undertaken by the Proponent against the construction contractor and implementation of noise management measures. CEMP has been updated by the construction contractor to address the non-compliance as corrective action.	CLOSED
2	OFI	Observation (Opportunity for Improvement)	<i>CEMP – Section 3.2 and Appendix C – Legal and Other Requirement register</i>	It was noted that the CEMP (Reference: UWF-NACAP-EHS-PLN-0006) dated 30 May 2025 was recently updated to revision 2. CEMP – Section 3.2 and Appendix C – The Legal and Other Requirements	It is recommended that the construction contractor review and update the legal and other requirements register within the CEMP to include all amendments to legislative and other requirements.	OPEN



Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
				Register was found to be outdated, failing to reflect the most recent legislative amendments and updates to other guidelines such as minor amendments to EP&A Act 1979 in 2025 and Water Management (General) Amendment (Exemptions for Infrastructure) Regulation 2025.		
3	OFI	Observation (Opportunity for Improvement)	<i>EMS – Section 5.3 - Complaints</i>	As part of the audit consultation process, Dubbo Regional Council requested that evidence is sought regarding a dust complaint forwarded to the Proponent by DRC and actions taken by the Proponent and resolution. Complaint register as of June 2025 was sighted by the Lead Auditor which did not include the dust complaint.	It is recommended that all complaints are recorded by the Proponent on the complaints register.	OPEN
4	OFI	Observation (Opportunity for Improvement)	<i>Heritage Management Plan v005 – Submission of the Final Salvage Report to the relevant agencies and the RAPs within the required timeframe.</i>	The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). There was no evidence available during the audit regarding submission of the Final Salvage Report to relevant agencies and the RAPs.	It is recommended that the evidence regarding submission of the Final Salvage Report to relevant agencies and RAPs is provided and included within the HMP to ensure commitments within the approved HMP are met.	OPEN



Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
5	OFI	Observation (Opportunity for Improvement)	<i>Heritage Management Plan v005 – Provision of ASIRFs to Heritage NSW</i>	ASIRFs were included in the Final Salvage Report however there was no evidence available during the audit regarding submission of ASIRFs to Heritage NSW.	It is recommended that the evidence regarding ASIRFs submission to the Heritage NSW is provided to ensure commitments within the approved HMP are met.	OPEN



3.3 Adequacy of CEMP and post approval documents

As part of the Audit, the Lead Auditor reviewed the Construction Environmental Management Plan and sub-plans (refer Section 3.1 for references) and conducted a high-level assessment of whether the above documents:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions of consent for the Project.

The Lead Auditor also assessed the adequacy of post approval documents (on the basis of whether):

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

The evidence reviewed and/or sighted during this first Independent Audit indicates that these documents are being implemented; with one (1) self-reported non-compliance raised against CoA B9 (outside the audit period), and four observations (opportunities for improvement) identified (refer Table 7).



3.4 Summary of notices from agencies

During the conduct of the first Independent Audit and interviews, the Auditees have confirmed that there were no notices from agencies during the Audit Period.

3.5 Other matters considered relevant by the Auditor or DPHI

As requested by DPHI, the below presents a review of key DPHI scope consultation issues and areas of concerns reviewed as part of this first Independent Audit and summarised below:

Table 8 Key issues and areas of focus raised by DPHI and other stakeholders

Authority	Key Issues and Areas of Focus	Assessment and commentary
DPHI	<i>Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.</i>	This audit was conducted in accordance with CoA C15 and the IAPARs. Consideration and commentary for DPHI matters are provided separately in this Section 3.5 and Table 8 (this table). Assessment of compliance with SSD 6687 Conditions, as applicable to the relevant stage of the Project (Stage -1, as noted in Section 1.4). Refer Audit Table within Appendix A. Environmental performance assessment (including but not limited to actual versus predicted impacts) is included in Section 3.6. A high-level assessment of the environmental management plans and sub- plans as related to construction is included in Sections 3.3 and 3.6 DPHI scope is summarised in this Table, with a detailed review of all applicable Conditions relevant to the stage being assessed as part of the audit to address DPHI's request and included in the Audit Table against these specific conditions, as relevant (refer Appendix A). Where these specific conditions may have interactions with other CoAs, an assessment of those requirements have been included as audit evidence and findings in the Audit Table (refer Appendix A).



	<i>Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.</i>	The environmental performance of the development was reviewed including; actual impacts compared to predicted impacts (refer Section 3.6.1), incidents and non-compliances (refer Section 3.6.3), complaints (refer Section 3.6.4), the physical extent of the development in comparison with the approved boundary (refer Section 3.6.2).
	<i>A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.</i>	The management plans, sub-plans, contractor documentation, and other documents were prepared in accordance with the conditions of consent and have been reviewed by the Proponent and approved by DPHI where relevant. A high-level assessment and review of Environmental Management Plans and Sub-plans was undertaken, and details are provided in Sections 3.3 and 3.6.6 of this Audit Report. The following observations (OFIs) were raised during the audit: • An observation (OFI) regarding the CEMP not including updated legislative and other requirements during regular updates has been raised as part of this Audit, refer to Table 7. • An observation (OFI) regarding recording all complaints on the Complaints Register was raised during this audit, refer to Table 7. • The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). There was no evidence available during the audit regarding submission of the Final Salvage Report to relevant agencies and the RAPs. An Observation was raised, refer Table 7. • ASIRFs were included in the Final Salvage Report however there was no evidence available during the audit period regarding submission of ASIRFs to Heritage NSW. An Observation was raised, refer Table 7.



	<i>Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.</i> <i>Please ensure you append this email to the Audit Report.</i> <i>The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.</i>	Monthly reports for the project were sighted by the Lead Auditor which include 12 minor incidents and no reportable incidents. One non-compliance was raised by the proponent outside the audit period in relation to CoA B9 which has been reported to DPHI on 29/01/2025 (outside the audit period). Refer to Table 7, Section 3.6.5 and Appendix A CoA B9 for details. The final audit report includes all consultation records (Appendix D). The Proponent has been given a copy of this Audit Report for comment (refer Section 2.2.10). It is the responsibility of the Proponent to submit the final audit report to DPHI and meet relevant requirements of the Consent.
	<i>Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.</i>	Approved CEMP, subplans, Environment Management Strategy, mitigation measures listed in the management plans were observed to be implemented during the audit site inspection including environmental controls in relation to soil, water, noise and dust management.
	<i>Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met</i>	The Lead Auditor has sighted the following documents related to biodiversity management and implementation of measures listed including pre-clearance checklists, hold point release, pre-construction commencement checklists, no-go zones established as sighted during the site inspection on 20 June 2025: • Environmental Management Strategy EMS v4, dated 19/06/2023, approved by DPHI dated 27/06/2023 • Biodiversity Management Plan v5 dated 31/08/2023, approved by DPHI dated 22/09/2023 • Bird and Bat Adaptive Management Plan v6a, dated 22/01/2024, approved by DPHI dated 22/02/2024 • Pre-clearance checklist dated 29/05/2025 for Civil Area 2 prepared by the construction contractor • Pre-construction commencement checklist (hold point release) dated 29/04/2025 prepared and released by the Construction Contractor



		- Revised offsets liability request was made by the Proponent to DPHI on 19/05/2023 and was accepted by DPHI on 15/06/2023. - Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 20/12/2024 The proponent submitted a Baseline Mapping request to DPHI dated 30/08/2021 providing details on the additional targeted survey effort undertaken for the Eastern Pygmy Possum and Squirrel Glider, in accordance with Condition B21(a). DPHI approval of the Baseline Mapping request was issued on 30/09/2021. The updated impacts based on the last Vegetation Mapping undertaken on 14 June 2024, include a maximum impact to BC Act listed vegetation = 20.57 ha and maximum impact to EPBC Act listed vegetation = 10.9 ha. Clearing Impacts are currently being tracked throughout construction period as evident through the implementation of pre-clearance checklists and post-clearing surveys sighted by the Lead Auditor. The Lead Auditor sighted a document titled 'Report on Compliance with Micrositing Restrictions' dated 17/05/2023 which has included ecological assessment to minimise biodiversity impacts of the development footprint. No non-compliance, incidents were raised as evident in the project monthly reports sighted by the Lead Auditor.
	<i>Details of the works that have been undertaken so far at the Project.</i>	The Lead Auditor has sighted the project Monthly Reports populated by the Proponent, which detail the works that have been undertaken thus far on the project, refer Section 1.1.4 for details.
	<i>Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.</i>	During the audit site inspection on 20 June 2025, the Lead Auditor reviewed the erosion and sediment control plans and their implementation on site. It was evident that the controls were installed in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans and the approved EMS.



	<i>If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.</i>	During the audit site inspection on 20 June 2025, the Lead Auditor observed the presence of exclusion zones or no-go zones around cultural heritage sensitive areas, and around the vegetation to be retained including hollow bearing trees. Refer example photographic evidence in Appendix E.
	<i>Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilgingery Road.</i>	Compliance documentation regarding Out Of Hours Works Approvals related to Twelve Mile Road and Ilgingery Road Works were sighted during the audit interviews as detailed below: The Proponent identified and reported a single self-reported non-compliance (outside the audit period) against the construction contractor (Nacap Pty Ltd) concerning noise monitoring. The non-compliance report (NCR) was issued to DPHI on 29/01/2025 by the Proponent in relation to out-of-hours work (OOHW) conducted at Twelve Mile Road and Ilgingery Road. This work was supported by Transport for New South Wales (TfNSW), endorsed by Dubbo Regional Council and approved by DPHI on 6/11/2024 and 7/11/2024. The Ilgingery Road works were completed prior to Christmas 2024. The NCR was raised due to incomplete noise monitoring records, which did not comply with the Construction Noise and Vibration Management Plan (CNVMP), Environmental Protection Licence (EPL), and other relevant documentation. Records sighted including completion of Noise monitoring training on 26/03/2025 as part of corrective and preventative action. No other non-compliances were noted.
	<i>Are accurate records are being kept, specifically in relation to community complaints and actions.</i>	Community complaints register (up to June 2025) was verified during the audit and details are provided in section 3.6.4 and in the Audit Table in Appendix A. In line with the CoA C16, the Lead Auditor has sighted the Complaints Register on Squadron Energy - UWF website 'https://www.squadronenergy.com/our-projects/Uungula-wind-farm' An Observation (OFI) was raised regarding all complaints to be recorded on the complaints register (refer to Table 7 for details).



	<i>In regard to consultation with other agencies, please consult with the following:</i> • <i>Local Council – Dubbo Regional Council</i> • <i>Environment Protection Authority</i> • <i>Transport for NSW</i> • <i>NSW DCCEEW CPHR</i> • <i>Heritage NSW</i> • <i>Water Group of DCCEEW</i> • <i>NSW Rural Fire Service</i> • <i>Community Consultative Committee</i>	Consultation with other agencies has been undertaken and records are provided in the Appendix D. Other details are provided within this Table 8.
	<i>Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus, the NSW Planning's expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).</i>	The Lead Auditor conducted a site inspection on 20 June 2025. A review of documentation including CEMP and subplans, other management plans, complaints, incidents was undertaken via face-to-face interview with Squadron Energy and the construction contractor Nacap Pty Ltd as part of the site inspection and audit interviews on 20 June 2025.
Dubbo Regional Council (DRC)	<i>"The sub-contractor to the Applicant, Wellington Sand and Soil, is utilising Wuuluman Road (unformed Road) creating serious dust pollution (B16) and damaging the road (B32) without maintaining it. Council has received complaints about the above that have also been reported to the Applicant who appears to not have taken any action.</i>	Regarding the complaint related to the sub-contractor Wellington Sand and Soil, the project complaint register was sighted which did not include dust complaints reported to DRC and to the Proponent. An observation (OFI) has been raised by the Lead Auditor with regards to inclusion of all complaints on the complaints register (refer Table 7).
	<i>Council notes that road works are under construction in accordance with Condition (B30) and noting Appendix 7 – Schedule of Road Upgrades, at the Goolma Road and Twelve Mile Road intersection:</i> • <i>Design and construct a new intersection with a channelised right (CHR) turn lane and an Auxiliary Left (AUL) turn lane treatment; and</i> • <i>Permanently remove and close the existing intersection.</i>	During the site inspection on 20 June 2025, it was evident that the Twelve Mile Road upgrade works have been completed (outside the audit period).



	Condition A14 requires the Applicant to enter into a VPA in accordance with Appendix 3. The applicant has entered into a Planning Agreement with Council which can be found on Council's website. As such, Condition A14 has been satisfied.	With regards to Voluntary Planning Agreement (VPA), the proponent has entered into a Planning Agreement with Council which can be found on Council's website. As such, the Lead Auditor notes that the Condition A14 has been satisfied as noted by Council.
	A recent inspection of the site did not indicate that any turbines have been constructed. Should the audit find turbines have been constructed, the applicant would be required to pay the relevant amount to Council."	The proponent has reported that no wind turbines have been constructed till date, which was evident during the audit site inspection on 20 June 2025.
Heritage NSW (DCCEEW)	Heritage NSW (DCCEEW) provided the following feedback in relation to the audit scope: <i>"In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the following as key matters for consideration:</i> <i>Condition B25 requires that the Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. In accordance with this condition Section 3.1 of the approved Heritage Management Plan (HMP, dated 19 July 2024) outlines specific measures to be implemented to ensure no harm, including demarcation as exclusion zones via fencing and/or signage and identification of exclusion zones on site plans. As per table 1 of the Conditions of consent this specifically includes avoidance and protection of the following Aboriginal sites:</i> • UWF SU49/L1 (AHIMS 36-5-0184) • UWF SU32/L1 (AHIMS 36-5-0174) • UWF SU96/L6 (AHIMS 36-5-0329) <i>As per Condition B26(c), Section 3.4 of the approved HMP requires that all site personnel undergo site induction training in relation to Aboriginal heritage and historic heritage and that records of heritage inductions will be kept. Evidence of the records or these inductions should be sought to confirm that this requirement has been met.</i>	No-go zones related to heritage areas were in place as evident during the audit site inspection on 20 June 2025 (refer Appendix E for example photographs). Areas of Aboriginal Locales located outside the development footprints were marked on construction related maps (examples of sighted documents include Civil Area 02 Environmental Control Map and LECH Pre-Commencement Form 2) as sighted by the Lead Auditor during documentation review. The following additional evidence was sought and sighted by the Lead Auditor: • Rapid Global UWF Online Induction May 2025 (including the requirements of Aboriginal heritage and historical heritage) • Induction records of personnel trained • Unexpected finds register which included no unexpected finds during the audit period • No heritage related incidents noted during the audit period as sighted within the Project Monthly Reports and incidents register Heritage Management Plan submission records to Heritage NSW dated 29/07/2024 and Heritage NSW response to the Proponent dated 01/08/2024 was sighted.
	Section 3.1 of the approved HMP requires that where Aboriginal artefact locales will be impacted, an Aboriginal Site Impact Recording Form (ASIRFs) will be completed and submitted to Heritage NSW within six (6) months from the commencement of the activity.	Aboriginal Site Impact Recording Forms (ASIRFs) were completed and included in the Final Aboriginal Cultural Heritage Salvage Report dated 24/01/2025 however there was no evidence available regarding submission of



	<i>Evidence should be sought to confirm that ASIRFs have been submitted for sites subject to approved harm within six (6) months of that harm. Note that harm also includes management activities such as salvage under an approved HMP.</i>	ASIRFs to Heritage NSW within the required timeframe. An observation (OFI) has been raised, refer Table 7.
	<i>In accordance with Condition B25, Section 3.2.1 of the approved HMP outlines that, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6 (of the Development Consent), the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location. Section 3.2.1 outlines the steps that must be followed including the post-salvage reporting and consultation requirements. Where any salvage has occurred under the HMP, evidence should be sought that the process complied with the procedure outlined in Section 3.2.1 of the HMP including evidence that the salvage report has been provided to the proponent, relevant agencies and RAPs.</i>	Consultation records (as of 22/07/2024) were sighted to be included within the HMP. During the audit interviews, copies of salvage records and approved Heritage Management Plan were sighted. The Final Salvage report concluded that twenty Aboriginal sites were salvaged. As noted within the Ozark Final Salvage Report, a total of forty-five artefacts were collected across ten sites and attempts to locate the recorded artefacts at the remainder of the ten sites were unsuccessful. The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). There was no evidence available during the audit regarding submission of the Final Salvage Report to relevant agencies and the RAPs. An observation (OFI) has been raised, refer Table 7.
	<i>Section 4.1 of the approved HMP commits to submitting ASIRFs to Heritage NSW (i.e. the Aboriginal heritage Information management system; AHIMS) for all sites impacted during construction. Evidence should be sought to confirm that this has been undertaken, where applicable."</i>	Aboriginal Site Impact Recording Forms (ASIRFs) were completed and included in the Final Aboriginal Cultural Heritage Salvage Report dated 24/01/2025 however there was no evidence available regarding submission of ASIRFs to Heritage NSW. An observation (OFI) has been raised, refer Table 7.
TfNSW	Transport for NSW provided the following feedback in relation to the audit scope: <i>"TfNSW would like the following matters considered within the audit:</i> <i>Review of the current operation of the Goolma Road and Twelve Mile Road intersection and compliance with the agreed secretary approval dated 23 November 2023.</i>	Current operation of the Goolma Road and Twelve Mile Road intersection was reviewed as part of the site inspection and document titled Monthly Report – May 2025 which included a site inspection by the Proponent, with the Construction Contractor and Dubbo Regional Council (local authority for this road as detailed in the report titled External Road Dilapidation Report V1.0 dated 17/11/2022). No issues were raised by the local road authority regarding the operation of the intersection and no non-compliance was identified.
	<i>A construction compound is being used at the intersection of Goolma Road and Twelve Mile Creek. TfNSW request information of how this was agreed to.</i>	A temporary construction compound was established at the intersection of Goolma Road and Twelve Mile Creek in February 2024 (outside the audit period). This compound was being demobilised after commencement of a new compound at 1360 Twelve Mile Road, Wuuluman as evident during the site inspection on 20 June 2025. The Proponent submitted further evidence post-audit showing a sub-



		licence from DRC with regards to the use of this temporary site compound. A document titled 'Licence Agreement between the Dubbo Regional Council, Department of Community and Justice (DCJ) and the Proponent' dated 20 April 2021 was sighted by the Lead Auditor.
	<i>Compliance with the requirements of the Traffic Management Plan Compliance with conditions of consent particularly Part B conditions B27 to B33.</i>	As part of the audit site inspection on 20 June 2025, Construction Traffic Management Plan version 005a was sighted and was observed to be implemented with no observations or issues raised (refer to CoA B27 to B33 for further details within the Audit Table in Appendix A).
Water Group of NSW DCCEEW	Water Group of NSW DCCEEW provided the following feedback in relation to the audit scope: <i>"NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the audit scope:</i> <i>The requirement to prepare and implement management plans that related to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include Water Management Plans and related sub-plans e.g., Site Water Balance, ERS&D Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.</i>	The audit review was limited to soil and water related consent conditions and the implementation of the documents required under the SSD-6687 conditions. Documents sighted including the contractor CEMP rev 2, in particular section 13 – soil and water management, Certified Professional in Erosion and Sediment Controls (CPESC) endorsed erosion and sediment controls plans. Implementation of the plans was evident during the site inspection on 20 June 2025. Auditees indicated that water from the sediment basins is captured and reused e.g., for dust suppression (subject to water quality criteria) however not verified further. The Lead Auditor has reviewed the works in accordance with the applicable consent conditions B17 to B19. The relevant documents sighted included: - Construction Environmental Management Plan Rev 02 dated 30/05/2025 includes section 13 – soil and water management - Erosion and sediment control plans prepared and implemented by the construction contractor as evident during the site inspection on 20 June 2025 - Pre and post rain inspection records prepared by the construction contractor (dated 15/05/2025)
	<i>Extraction Plans and related sub-plans e.g, Water Management Plan, Subsidence Management Plan</i> <i>The requirement to prepare and implement trigger action response plans</i>	Not Applicable as indicated by the Auditees



	<i>for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.</i> • <i>Annual reporting clearly documents;</i> 1) <i>water take, use and water source impacts,</i> 2) <i>compare results with previous years, and</i> 3) <i>identifies exceedances and how these are managed/mitigated."</i>	
	• <i>Water supply availability is clearly defined for the project</i>	Water supply availability has been defined in the Contractor CEMP v02 section 13.1.7 dated 30/05/2025.
	• <i>Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018</i> • <i>Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant</i> • <i>Water Access Licence/s used to account for water take by the project nominates the work where water is being taken from</i>	Water access licences (dated 05/06/2008, 1/12/2020, 10/09/2014, which were outside the audit period). Water take at the site is documented by water meter records as sighted by the Lead Auditor. Water supply work and water use approval dated 01/07/2004 (sought outside this audit period) with the expiry date being 28/03/2028.



3.6 Environmental Performance

3.6.1 Actual vs Predicted Impacts

Actual versus Predicted Impacts

A qualitative assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (prepared by CWP Renewables, dated 20 May 2020) for the Project, was conducted as part of this Audit.

The overall actual impacts were found to consistent with the predicted impacts relevant to the construction phase of the development during the audit period.

Table 9 Actual versus Predicted Impacts

Aspect	Summary of predicted impacts	Summary of actual impacts observed during the audit site inspection and audit period	Consistent (Yes, No or Not Applicable)
Landscape and Visual	The Project is situated in a gently rolling landscape primarily used for agricultural grazing. Impacts to nearby receptors are noted.	During this audit period, limited construction activities have been undertaken since construction commencement. The updated Site Final Layout v2 (dated 07/11/2023), approved by DPHI via an email to the Proponent on 17/11/2023 indicates a reduction in WTG numbers, from 93 to 69; with WTGs yet to be constructed.	Yes
Noise and Vibration	The Project is situated in a primarily agricultural area with low ambient noise levels. Community consultation has highlighted concerns about noise generation.	During this audit period, limited construction activities have been undertaken since construction commencement and no noise and vibration complaints were recorded on the Complaints Register sighted by the Lead Auditor. The Lead Auditor sighted noise monitoring records dated 26/04/2025 in accordance with the approved EMS and CEMP. The audit confirmed the implementation of Construction Environmental Management Plan which includes Noise and Vibration Management measures. One non-compliance was raised and self-reported (outside the audit period) by the Proponent against the construction contractor	Yes



		in relation to CoA B9 (refer to CoA B9 in Appendix A and Table 7).	
Biodiversity	The Project will unavoidably impact approximately 639 ha of native vegetation within the Development Corridor based on the current Development Footprint.	During the audit, documents were sighted including Squadron Energy internal audit dated October 2024, Micrositing exercises dated 17 May 2023, incorporating ecological assessments, which have been conducted to minimise the biodiversity impacts of the development footprint. Additional measures to further reduce impacts are being considered during construction as evident by the Site final Layout Plan v2 confirming the reduction in WTGs from 93 to 69 minimising additional clearing requirements. It is understood from the auditees that the civil design is advancing with refinements to further reduce impacts (not sighted or verified further by the Lead Auditor). As per the review of the correspondence between the Proponent and BCS dated 25/06/2024, the latest Vegetation Mapping data was provided to BCS on 14 June 2024, the Squadron Energy internal audit reflects updated impacts, with a maximum impact of 20.57 ha on <i>Biodiversity Conservation Act</i>-listed vegetation and 10.9 ha on <i>Environmental Protection and Biodiversity Conservation Act</i>-listed vegetation. Clearing impacts are being actively monitored throughout the construction period as evident in the DPHI approval letter dated 17/01/2025.	Yes
Traffic and Transport	Traffic and transport impacts may result in various direct and indirect adverse effects, with concerns raised during community and stakeholder consultations.	Approved Traffic Management Plan implementation was evident during the audit site inspection. There were no complaints recorded regarding traffic and transport during the audit period.	Yes
Aviation	Impacts to nearby airports and airports related aircraft activities. The findings of the Aviation assessment report identified Mudgee Airport and Dubbo Airport, Wellington aerodrome (Bodangora aerodrome), and the Gulgong Aero Park are all located within 30	Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit's scope.	Not Applicable



	nautical miles (nm) to the Project site. There is also high probability for numerous other aviation activities associated with unlicensed private air strips, including one known grass runway within the site boundary and three known grass airstrips upon adjacent land. The Project is not expected to have any impact on civil air traffic operating under either Instrument Flight Rules (IFR) or Visual Flight Rules (VFR) but will rather act as a prominent feature which may assist in visual navigation.		
Telecommunications hazards and risks	The impact assessment evaluated existing radio, telecommunications, and communication systems in the region and assesses potential interference from the Project. Large structures, such as Wind Turbine Generators (WTGs), could cause interference if located near or within signal paths. The assessment concludes that the Project will not impact existing signals or communication systems. However, caution is advised during WTG installation, with adjustments to planned positions as needed, within consent parameters, to minimize interference with television and radio broadcasting.	Actual impacts would be associated with the installation/operation of the wind farm and therefore not included in this audit's scope.	Not Applicable
Electromagnetic fields	The Project has assessed the occurrence of Electromagnetic Fields (EMFs) and potential radiation impacts, in line with relevant guidelines, focusing on human health, safety, and potential disruptions to existing services across all Project stages. EMFs are expected to be indistinguishable from naturally occurring background levels at the site boundary, posing no risk to the public or nearby electrical devices.	Actual impacts would be associated with the installation and operation of the electrical infrastructure and therefore not included in this audit's t scope.	Not Applicable
Low frequency noise and infrasound	Aerodynamic noise from Wind Turbine Generators (WTGs) includes low-frequency noise (20 Hz to 100 Hz) and infrasound (below 20 Hz), generated when WTG blades encounter air stream disturbances from the tower. While WTGs produce some low-frequency noise and infrasound, sound levels	Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit's scope.	Not Applicable



	at receptors over 200 meters away are imperceptible to the human ear. There is no evidence that infrasound below the hearing threshold causes physiological or psychological effects.		
Shadow flicker and blade glint	Shadow flicker, caused by intermittent shadows from Wind Turbine Generator (WTG) blades, and blade glint, the reflection of natural light off blade surfaces, may potentially disturb observers. Analysis of shadow flicker at dwellings near the Project, included in the visual impact assessment, indicates that no associated or non-associated dwellings are expected to exceed the recommended limit of 30 hours per year, as per the Draft National Guidelines. There is also negligible risk to passing motorists. Mitigation measures, standard for large-scale wind farms, incorporate design principles and advanced WTG technology to minimize these impacts. Shadow flicker at any dwelling must not exceed 30 hours annually unless prior agreements are made with affected landholders.	Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit 's scope.	Not Applicable
Energy Storage facilities (ESF)	An assessment of the ESF and its associated risks was undertaken. The ESF, which will most likely be lithium-ion battery based, will allow the Project to store and dispatch scheduled and reliable energy to and from the Project. A preliminary hazard assessment and risk prioritisation considered lithium-ion batteries and found that not-insignificant but low-level hazards related to the Battery Energy Storage System (BESS) included electrocution, crushing and toxicity, whilst the medium level hazards included fire and explosion.	BESS is the Stage 2 of the development therefore has not been included in this audit's scope.	Not Applicable
Bushfire and electrical fire	The Project site encompasses areas ranging from low to high bushfire risk, as identified in the NSW Rural Fire Service bushfire-prone land mapping. The Bushfire Risk Assessment evaluates existing fire hazards and potential fire risks	Approved Biodiversity Management Plan is being implemented during construction which details bushfire and electrical fire management measures.	Yes



	associated with the Project across its various development stages.		
Aboriginal cultural heritage	The Wiradjuri Aboriginal people have historically occupied the Study Area, using the land for hunting, fishing, and gathering, with extensive archaeological evidence, primarily stone artefacts, confirming their presence. Field surveys and searches of the Aboriginal Heritage Information Management System (AHIMS) identified 168 Aboriginal sites, with no declared Aboriginal places. Over 370 stone artefacts were recorded across 42 sites, with 10 within the Ungula Wind Farm Development Footprint and two nearby, though most sites are outside the footprint and unlikely to be impacted.	Approved Heritage Management Plan is being implemented on site. Site salvage was completed on 24 January 2025 with the final report sighted by the Lead Auditor during documentation review. Following the audit, the Proponent submitted further evidence related to implementation of Heritage Management Plan, approved by DPHI on 06/09/2024 including Ungula Wind Farm Salvage report v3.0 dated 24 January 2025 and Goolma Road and Twelve Mile Road Intersection - Aboriginal Cultural Heritage Salvage Report dated 16 November 2023. There were no unexpected heritage finds or incidents identified during the audit period as per the project registers.	Yes
Historical Heritage	A search of relevant databases revealed that there are no heritage items within the Project Site listed on the Australian Heritage Database. A search of the Wellington Local Environmental Plan 2012 revealed that while there are various items listed as historic heritage of local significance within 5 km of the Project Site, there are no heritage items currently listed within the Project Site.	Approved Heritage Management Plan is being implemented on site. Site salvage was completed on 24 January 2025 with the final report sighted by the Lead Auditor during documentation review. There were no unexpected heritage finds identified during the audit period as per the project monthly reports.	Yes



Water and Soils	Construction activities, including wind turbine generators (WTGs), roads, and cable crossings, pose risks of erosion and sediment runoff, which could impact water quality.	The Lead Auditor sighted CPESC endorsed ERSED plans which were created and applied to road upgrade works, to minimise soil erosion. Water carts are used to minimise dust generation (sighted during the audit site inspection). Water use licences in place as per the evidence sighted by the Lead Auditor. During the audit site inspection and audit interviews, documents related to site inspections pre and post rain inspection were sighted. The weekly inspection records prepared by the construction contractors were sighted. ERSED controls were evident to be implemented during the site inspection on 20 June 2025 following watercourse crossing guidelines and <i>Water Management Act 2000</i>.	Yes
Resource Requirements and Waste	Project's resource requirements increasing pressure on local resources.	During the audit site inspection, it was evident that waste management is being undertaken in accordance with approved EMS and CEMP Section 15. The auditees indicated that the resource requirements for the Project including the sourcing of cement, aggregate, sand, asphalt, water and road base material is undertaken locally where practical.	Yes
Socio-Economic Factors	The Project would have an overall positive impact on the local and wider economy during both the construction and operational period. The Project will also have a number of social benefits including the potential for the community to directly invest in the Project. Host landowner properties will also benefit from the Project through the construction of new internal roads which reduce bushfire risks and decrease the likelihood of loss of buildings, machinery, livestock and fencing.	Approved Environmental Management Strategy, CEMP and subplans are in place and being implemented. Community complaints generally being managed as evident during the review of the complaints register and auditee interviews.	Yes
Cumulative Impacts	Cumulative impacts from other major and renewable energy	Approved Environmental Management Strategy and CEMP	Yes



	projects within the vicinity. These projects include: • Bodangora Wind Farm (operating). • Crudine Ridge Wind Farm (under construction). • Liverpool Range Wind Farm (approved); and • Flyers Creek Wind Farm (approved).	and subplans are in place and being implemented as evident during the audit site inspection and auditee interviews. As sighted in the Community Newsletters and discussions with the proponent, for all nearby projects and other identified projects, the combined effect of temporal and spatial separation between the Project and other developments occurring, or proposed to occur, in conjunction with project specific mitigation measures are considered appropriate to satisfactorily mitigate potential cumulative impacts.	
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3.6.2 *Physical extent of the development*

During the site inspection on 20 June 2025, an assessment of the physical extent of the development was limited to visual observations of sites inspected in relation to the approved project boundary. Property boundary agreements with the relevant landowners and details of no-go zones were sighted on site. Further details of the landowner agreements are provided in the audit table.

3.6.3 *Incidents and non-compliance*

There was one self-reported non-compliance outside the audit period (Refer to Table 7 for details) which was reported to DPHI by the Proponent on 29/01/2025, and twelve minor incidents occurred as per the monthly reports reviewed by the Lead Auditor. No reportable incidents were noted within the incident register and the project Monthly Reports.

3.6.4 *Complaints*

The complaints register was reviewed and recorded ten complaints between 11 January 2024 and 13 June 2025. Majority of the complaints were related to stakeholder engagement, with one related to dust and one related to concerns around working hours, staging, construction commencement and environment (Ref: Complaints Register, June 2025). All complaints were responded to appropriately by the Proponent and closed.

It is noted that at the time of this Audit, specific stakeholder engagement was being undertaken by the Proponent to minimise further complaints. It is the Lead Auditor's opinion that consultation with the affected third parties has been conducted in a timely manner.



In that context, the Lead Auditor is of the opinion that complaints within the audit period were adequately responded to and managed.

3.6.5 Compliance

The Proponent regularly reviews compliance against the planning approval conditions in accordance with the compliance review process in the approved Environmental Management Strategy Rev 004 dated 19/06/2023. There was one compliance review undertaken by the Proponent outside the Audit Period:

One non-compliance with CoA B9 was identified and self-reported by the proponent outside the audit period, and four observations were raised during this audit as included in Table 7 of this Audit Report.

3.6.6 Adequacy of CEMP and sub-plans

Refer Section 3.3 for a high -level assessment of the adequacy and implementation of the CEMP and sub-plans.

Overall Environmental Performance

The environmental performance of the Project during the audit period is considered to be high, noting below:

- The Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of this first Independent Audit's Scope.
- The implementation of the CEMP and subplans was further assessed on-site - with four observations (opportunities for improvement) raised during the audit period (refer Table 7 and Appendix E).
- As noted in this Audit Report, there was one - self-reported non-compliance with CoA B9 by the Proponent outside the audit period.
- The Auditees were organised and responded promptly to additional information requests during this audit.



4. CONCLUSION

This Audit Report presents the findings from the first Independent Audit of the Uungula Wind Farm Project. The temporal period covered by the audit is from the date of commencement of construction on 31 March 2025 to the date of the audit site inspection on 20 June 2025.

With respect to this first Independent Audit Independent Audit:

- **86 conditions** were assessed.
- **One non-compliance** was identified and had been self-reported outside the audit period.
- **60** conditions were considered to be **compliant**.
- **25** conditions were considered **not triggered**.

In addition to the above, **four observations (opportunities for improvement)** were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of this first Audit's Scope. The implementation of these requirements on site was also observed as high.

The Lead Auditor would like to thank the Auditees from Squadron Energy and Nacap Pty Ltd, for their organisation, cooperation and support during the conduct of this first Independent Audit.



5. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and HBI's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no fourth party may use or rely on this Report unless otherwise agreed by HBI in writing.

The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. HBI will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, HBI expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any fourth party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of HBI). HBI does not admit that any action, liability or claim may exist or be available to any fourth party. The scope of this audit does not cover a detailed verification of compliance with the conditions of the Deed, nor does it extend to the verification of items assessed by the Independent Certifier prior to issuing of a certificate for any stage.



APPENDIX A – SSD 6687 CONDITIONS OF APPROVAL AUDIT TABLE



Item	Details
Project Name:	Uungula Wind Farm SSD 6687
Auditee/Client	Squadron Energy
Lead Auditor:	Maulik Bapodara
Auditor/Audit Team:	Swathi Gowda
Audit Details:	First Independent Audit (Construction)
HBI Project No.:	241116 Squadron Energy Uungula Wind Farm

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Modification #	Date
Modification 1	21-Apr-22
Modification 2	2-Dec-22
Modification 3	PENDING

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1		In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development.	The Proponent reported that no material harm has occurred to the environment. Management plans being prepared for the development contain reasonable and feasible measures. • Interview with the Auditees, 20/06/2025. • Site inspection, 20/06/2025 • Evidence referred to elsewhere within this Audit Table Current approved management plans are being implemented: • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v005A, dated 27/03/2025, approved 28/03/2025 • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006	C	As per the findings from this Audit, including any Non-Compliances and Observations raised throughout. The Lead Auditor has sighted the following approved documents: • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v005A, dated 27/03/2025, approved 28/03/2025 • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006
TERMS OF CONSENT					
A2		The development may only be carried out: a in compliance with the conditions of this consent; b in accordance with all written directions of the Planning Secretary; c generally in accordance with the EIS; and d generally in accordance with the Development Layout in Appendix 2.	• Auditee interviews and site inspection on 20 June 2025 • Evidence referred to elsewhere within this Audit Table. • The EMS 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.	C	As per the findings from this Audit, including any Non-Compliances and Observations raised throughout. The Proponent identified and self-reported a non-compliance in relation to CoA B9 on 28/01/2025 (outside the audit period) regarding the construction contractor not undertaking noise monitoring in accordance with ICNG. Non-compliance report was submitted to DPHI on 29/01/2025, DPHI response to the Proponent via a letter dated 10 April 2025 was sighted by the Lead Auditor. The following non-compliance and observations (OFIs) were raised during the audit period: • Non-Compliance against CoA A7d regarding appropriate approval for the establishment and use of a temporary construction compound at the intersection of Goolma Road and Twelve Mile Road (outside the audit period. • An observation regarding review and update od the legal and other requirements register within the Contractor CEMP. • An observation regarding the Proponent recording all complaints on the complaints register. • An observation regarding evidence related to the submission of the Final Salvage Report to the relevant agencies and RAPs in accordance with the approved HMP. • An observation regarding submission of ASIRFs to Heritage NSW within the required timeframe in accordance with the approved HMP.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
A3		The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:	• Auditee interviews and site inspection on 20 June 2025 • Evidence referred to elsewhere within this Audit Table.	C	Where applicable during the audit period the Proponent complied with the written requirements or directions of the Planning Secretary as evident during the documentation review, refer example documents below. The Lead Auditor has sighted the following approved documents: • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v005A, dated 27/03/2025, approved 28/03/2025 • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006
	a	any strategies, plans or correspondence that are submitted in accordance with this consent			
	b	any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and			
	c	the implementation of any actions or measures contained in these documents.			
A4		The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	• Auditee interviews and site inspection on 20 June 2025	C	Interview with the Proponent and the Construction Contractor confirmed no inconsistencies were identified during the audit period.
LIMITS ON CONSENT					
A5	Total Number of Wind Turbines	A maximum of 97 93 wind turbines may be constructed and operated on the site. The turbines may be replaced or upgraded as necessary from time to time in accordance with the conditions of this consent.	• Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: • Final Layout plan is for 69 wind turbines only. Final Layout Plan dated 7/11/2023	C	The Lead Auditor has sighted documents titled 'Final Layout Plan v2 date 7/11/2023' and 'UWF Micrositing register'. The Final Layout Plan v2 (Source SSD 6687 - Major Project Website), DPHI email to the Proponent dated 17/11/2023 regarding the Proponent's submission of the Final Layout Plan v2. The DPHI advised to the Proponent that it had no comments on the document at the time.
A6	Wind Turbine Height	The maximum permitted height of any wind turbine (measured from above ground level to the blade tip) is 250 metres.	• Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: • Final layout plan is for 69 wind turbines only. Final Layout Plan dated 7/11/2023 • Construction contract is for 69 wind turbines at max height of 250 metres.	C	The Lead Auditor has sighted documents titled 'Final Layout Plan v2 date 7/11/2023' and 'UWF Micrositing register'. The Final Layout Plan v2 (Source SSD 6687 - Major Project Website). The Lead Auditor sighted DPHI email to the Proponent dated 17/11/2023 regarding the Proponent's submission of the Final Layout Plan v2. The DPHI advised to the Proponent that it had no comments on the document at the time.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
A7	Micro-siting Restrictions	Wind turbines and ancillary infrastructure may be micro-sited without further approval providing:	- Auditee interviews and site inspection on 20 June 2025 - Micro-siting report prepared by the Proponent addressing compliance with each requirement of A7.	C	The Lead Auditor sighted the document titled 'Report on Compliance with Micrositing Restrictions (Condition A7)' dated 17/05/2023 in relation to CoA A7. A document titled Uungula Wind Farm – Goolma Road and Twelve Mile Road Intersection - Aboriginal Cultural Heritage Salvage (dated 16 November 2023) was sighted which included a reference to setup of a temporary site compound and parking area within Lot 2/DP1141897 and that the proponent has sub-licence from DRC to use the land. The Proponent provided further evidence in the form of a document titled ‘Licence Agreement Under Delegated Authority’ dated 20 April 2021 which was sighted by the Lead Auditor.
	a	the surface disturbance remains within the development corridor (with the exception of wind monitoring masts) shown on the figure in Appendix 2;	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 2 Appendix A		
	b	no wind turbine is moved more than 100 metres from the relevant GPS coordinates shown in Appendix 2;	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - QGIS mapping of final microstied WTGs (Rev 11 layout), and spreadsheet demonstrating the distance of the WTGs is still within 100m of the approved WTG location. Spreadsheet saved on file. - Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 3 Appendix B		
	c	the revised location of the blade of a wind turbine is at least 50 metres from the canopy of existing hollow-bearing trees; or where the proposed location of the blade of a wind turbine is already within 50 metres of the canopy of existing hollow-bearing trees, the revised location is not any closer to the existing hollow-bearing trees;	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - Micrositing report prepared to detail the compliance with this condition. the Proponent has prepared a report to demonstrate the separation distance and compliance. - Per current Contract plans, 1 x monitoring mast will be located outside development corridor. Located adjacent Turbine 23. - Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 3 Appendix B		
	d	the revised location of the wind turbine and/or ancillary infrastructure would not result in any non- compliance with the conditions of this consent; and	- Auditee interviews and site inspection on 20 June 2025 - Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 4		
	e	the wind monitoring masts are located within the development corridor where possible and their development would not result in any non-compliance with the conditions of this consent.	- Auditee interviews and site inspection on 20 June 2025 - Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 5		
BATTERIES					
A8	Battery Storage Restriction	Unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 150 MW.	- Auditee interviews and site inspection on 20 June 2025 - Battery Energy Storage System (BESS) is stage 2 of the development and has not commenced yet.	NT	Operations have not commenced yet. Construction phase commenced on 31 March 2025 as per a letter from the Proponent to DPHI dated 28 March 2025 and is ongoing with the first Independent Environmental Audit (this audit) site inspection undertaken on 20 June 2025. As per the approved Environmental Management Strategy section 1.2 and a letter titled 'Staging of Strategies, Plans and Programs Approval', the BESS (stage 2) of the development has not commenced.
		<i>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage facility or system in the future.</i>	Operations have not commenced yet.		

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
EVIDENCE OF CONSULTATION					
A9	Evidence of Consultation	Where conditions of this consent require consultation with an identified party, the Applicant must:	• Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: • B21a - Baseline mapping. Consultation with NSW Department of Planning and Environment’s Biodiversity, Conservation and Science Directorate (BCS). • B21b - Credit liabilities. Consultation with BCS. • B23 - Biodiversity Management Plan (BMP). Consultation with BCS. • B24 - Bird and Bat Adaptive Management Plan (BBAMP). Consultation with BCS. • B26 - Heritage Management Plan (HMP). Consultation with Heritage New South Wales (NSW). • B31 - Repair of damaged roads • B33 - Traffic Management Plan (TMP). Consultation with Dubbo Regional Council (DRC). and Transport for NSW. • B38 - Fire Hazard Analysis (battery) • B41 - Procedures to manage potential fires. Consultation with New South Wales Rural Fire Service (NSW RFS). • B45 - Accommodation and Employment Strategy. DRC	C	The Lead Auditor has sighted the evidence of consultation within the relevant management plans (further details are noted against each condition below): • B21a - Baseline mapping. Consultation with BCS. • B21b - Credit liabilities. Consultation with BCS. • B23 - BMP. Consultation with BCS. • B24 - BBAMP. Consultation with BCS. • B26 - HMP. Consultation with Heritage NSW. • B31 - Repair of damaged roads • B33 - TMP. Consultation with DRC and TfNSW. • B38 - Fire Hazard Analysis (battery) • B41 - Procedures to manage potential fires. Consultation with RFS. • B45 - Accommodation and Employment Strategy. DRC. The following evidence was sighted by the Lead Auditor in addition to the above: • Meeting minutes regarding meeting with DPHI on 15 May 2025 • Meeting minutes regarding meeting with EPA on 16 May 2025 • Meeting minutes regarding meeting with TfNSW on 19 May 2025
	a	consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and			
	b	provide details of the consultation undertaken including: (i)the outcome of that consultation, matters resolved and unresolved; and (ii)details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.			
PROTECTION OF PUBLIC INFRASTRUCTURE					
A10		Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	• Auditee interviews and site inspection on 20 June 2025 • No repairs were required for any public infrastructure as evident within the dilapidation survey reports. • Service lines were discovered during road works along Twelve Mile Road in 2024. Relevant road authority (TfNSW) was notified. Service relocation was undertaken as part of the Goolma Road and Twelve Mile Road intersection works.	C	The Lead Auditor sighted document titled 'UWF-NACAP-CIV-RPT-0017_0 Dilapidation Report dated 17/11/2022 and DPHI approval of it dated 6/6/2023 in relation to CoA A10.
	a	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and			
	b	relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.			
		<i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by condition A14 of this consent.</i>			
DEMOLITION					
A11		The Applicant must ensure that all demolition work on site is carried out in accordance with AS 2601- 2001: The Demolition of Structures (Standards Australia, 2001), or its latest version.	• Auditee interviews and site inspection on 20 June 2025 • No demolition work undertaken to date.	NT	The Lead Auditor has sighted monthly reports for the months February 2025, March 2025 and May 2025 which included works undertaken till date, no demolition works were included in the list of completed activities.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
STRUCTURAL ADEQUACY					
A12		The Applicant must ensure that:	- Auditee interviews and site inspection on 20 June 2025 - As of 20 June 2025, Wind turbine Generator (WTG) construction has not commenced yet. No other buildings or structures have been constructed.	NT	During the site inspection on 20 June 2025, visual observations were made by the Lead Auditor and it was evident that WTG construction was not commenced and no other buildings or structures have been constructed.
		the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of IEC 61400-1			
	a	Wind turbines – Part 1: Design Requirements (or equivalent); and			
	b	all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.			
		Notes: - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. - The EP&A Development Certification Regulation sets out the requirements for the certification of the development. - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.			
COMPLIANCE					
A13		The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - Memos and briefing has been provided to geotechnical contractors, the construction contractor (the Construction Contractor) to fulfil this requirement. - the Construction Contractor site induction include reference to Approvals and talk to requirement to be aware, understand and comply with conditions. - the Construction Contractor Induction Records and pre-start briefings. - the Construction Contractor Induction updated to include information regarding EPL requirements.	C	The Lead Auditor has sighted the following induction and toolbox talk records (prepared by the construction contractor NACAP) in relation to CoA A13. - Rapid Global UWF Online Induction (including the requirements of SSD 6687) - Toolbox Talk - 03.05.2025 - ERSED - Toolbox Talk - 24.05.2025 - Dewatering_ERSED_Clearing works & totals - UWF- Weekly staff meeting - 26.05.25 - Induction details and personnel sign-on documents
COMMUNITY ENHANCEMENT					
A14		Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - Voluntary Planning Agreement (VPA), dated 20/12/2021, was executed by Uungula Wind Farm Pty Ltd and Dubbo Regional Council. Refer to Section 2 of the VPA. The executed VPA addresses the requirements from Appendix 3 of the Development Consent.	C	The Lead Auditor has sighted the VPA between the Proponent and Dubbo Regional Council dated 20/12/2021.
	a	Division 7.1 of Part 7 of the EP&A Act; and			
	b	the terms of Council’s letter dated 26 March 2021, which are summarised in Appendix 3.			
OPERATION OF PLANT AND EQUIPMENT					
A15		All plant and equipment used on site, or in connection with the development, must be:	- Auditee interviews and site inspection on 20 June 2025 The following evidence was provided by the Proponent: - All equipment used on site to date has been maintained in a proper and efficient condition. - the Construction Contractor maintains an inspection register for equipment - All equipment used on site to date has been operated in a proper and efficient manner. - the Construction Contractor maintains competency records	C	The Lead Auditor has sighted plant and equipment inspection register and competency records as of June 2025 during site inspection with the Construction Contractor. Plant and equipment was being used on site at the time of inspection.
	a	maintained in a proper and efficient condition; and			
	b	operated in a proper and efficient manner.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
SUBDIVISION					
A16		The Applicant may subdivide the site comprising the site for the purposes of carrying out the development, in the following manner:	- Auditee interviews and site inspection on 20 June 2025 - Subdivision has not yet occurred.	NT	The Proponent reported that subdivision has not yet occurred however there was no evidence provided to the Lead Auditor to verify this.
	a	to create separate freehold titles for the purposes of the three substation options identified Appendix 4; and			
	b	to enable registration of leases on any title of the land comprising the site by: - registration of plans of subdivision for lease purposes; or - such other manner as may be required under the Conveyancing Act 1919 (NSW), as shown by the lease areas contained in Appendix 5, in accordance with the EIS and the requirements of the EP&A Act, EP&A Regulation and Conveyancing Act 1919 (NSW).			
A17		For the avoidance of doubt, other than as permitted by condition A16(a) of Schedule 2, this consent does not permit the creation of new individual freehold titles as a result of the subdivision of existing freehold titles.	- Auditee interviews and site inspection on 20 June 2025 - No individual freehold titles have been created.	C	The Proponent reported that new individual freehold titles have not been created however there was no evidence provided to the Lead Auditor to verify this.
A18		Any subdivision certificate issued in relation to a plan of subdivision registered in accordance with condition A16(b) of Schedule 2 must contain a statement that the subdivision is only for the purposes of registering leases as set out in condition A16(b) of Schedule 2.	- Auditee interviews and site inspection on 20 June 2025 - Subdivision has not yet occurred.	NT	The Proponent reported that subdivision has not yet occurred however there was no evidence provided to the Lead Auditor to verify this.
A19		The consent for subdivision for lease purposes under condition A16(b) of Schedule 2 expires on the date the Secretary is satisfied that the site has been rehabilitated in accordance with condition 35 of Schedule 3.	- Auditee interviews and site inspection on 20 June 2025 - No rehabilitation has commenced.	NT	The Proponent reported that no rehabilitation has occurred till date however there was no evidence provided to the Lead Auditor to verify this.
COMMUNITY CONSULTATIVE COMMITTEE					
A20		The Applicant must operate a Community Consultative Committee (CCC) for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016), or its latest version.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - CCC has been established and chaired by Garry West. CCC minutes are posted on website. 20/01/2025: DPHI appointed Keiyana Guihout as a community representative to the UWF CCC.	C	CCC meeting minutes between 25 February 2013 and 22 May 2025 were sighted by the auditor. Any enquiries or issues raised in the CCC meetings are resolved by the Proponent during or after each meeting as noted in the relevant minutes.
APPLICABILITY OF GUIDELINES					
A21		References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	- Auditee interviews and site inspection on 20 June 2025 - Evidence referred to elsewhere within this Audit Table.	C	The Lead Auditor has sighted the approved Environmental Management Strategy dated 19/06/2023 and the contractor CEMP v2 dated 30/05/2025 that include references to all applicable guideline, protocol, Australian Standard or policy within their relevant sections.
A22		However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	- Auditee interviews and site inspection on 20 June 2025 - Evidence referred to elsewhere within this Audit Table.	C	The Lead Auditor has sighted the approved Environmental Management Strategy dated 19/06/2023 and the contractor CEMP v2 dated 30/05/2025 that include references to all applicable guideline, protocol, Australian Standard or policy within their relevant sections.
B1		THIS CONDITION WAS DELETED IN MODIFICATION 1 OF THE CONSENT The Applicant must not construct the applicable wind turbines listed in Table 1 unless the Applicant has an agreement with the owner(s) of the relevant residence in regard to the visual impacts associated with the development, and the Applicant has advised the Department in writing of the terms of this agreement.	- Auditee interviews and site inspection on 20 June 2025 - As per the Modification 1 dated 21 April 2022, the CoA B1 was deleted from the consent.	NT	As per the Modification 1 dated 21 April 2022, the CoA B1 was deleted from the consent.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
VISUAL					
B2		For a period of 5 years from the commencement of construction, the owner of any non-associated residence within 5 km of any turbine identified in the Final Layout Plan may ask the Applicant to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Applicant must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence. All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning 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 Planning Secretary for resolution. "Notes: • To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage. • The identification of appropriate visual impact mitigation measures will be more effective following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction, it is recommended owners consider whether there is benefit in delaying such a request until the relevant wind turbines are visible from their residence or its curtilage."	• Auditee interviews and site inspection on 20 June 2025 • 31/3/2025: Commencement of construction. 5 year period ends 31/3/2030	C	The Lead Auditor has sighted a notification letter from the Proponent to DPHI dated 28 March 2025 advising DPHI of construction commencement date to be 31 March 2025 in accordance with CoA B2 available on Major Projects website, and a letter from DPHI to the Proponent dated 1 April 2025 confirming the commencement date of construction to be 31 March 2025. During the site inspection, no WTG construction was evident.
B3		The Applicant must:	• Auditee interviews and site inspection on 20 June 2025 • Construction contract specifies off white/grey in accordance with this condition. No WTGs are in place yet. • All ancillary infrastructure including site offices was observed to be coloured off-white	NT	During the site inspection, it was evident that no WTGs are in place yet. Site offices were observed during the site inspection. Site safety and communications (radio channels) signage was in place. No other advertising or signage was observed during the audit site inspection on 20 June 2025.
	a	take all reasonable steps to minimise the off-site visual impacts of the development;			
	b	ensure the wind turbines are: • painted off white/grey, unless otherwise agreed by the Planning Secretary; and • finished with a surface treatment that minimises the potential for glare			
	c	ensure the visual appearance of all ancillary infrastructure (including paint colours, specifications and screening) blends in as far as possible with the surrounding landscape; and			
	d	not mount any advertising signs or logos on wind turbines or ancillary infrastructure (except where required for safety or emergency purposes).			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B4		The Applicant must:	- Auditee interviews and site inspection on 20 June 2025 - Wind turbine construction has not commenced as of 20 June 2025. Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Obstacle lighting review and risk assessment prepared by Aviation Projects. Report was submitted to CASA on 8/05/2023 for further consultation on the need for aviation lighting. Meeting requested. 23/05/2023: CASA have provided comments, advising that they still recommend aviation lighting for UWF. 13/06/2023: Aviation lighting plan (v2) developed by Aviation Projects. 16/06/2023: Lighting Plan (v2) submitted to CASA for review. 20/06/2023: CASA approve/accept the aviation lighting plan (v2). 17/04/2023: Requirement for aviation lighting is confirmed, per the note above in B4b. - SQE are investigating options to minimise the visual impacts of any aviation lighting. 17/04/2023: Pending outcomes of consultation with CASA. 20/06/2023: CASA approve/accept the aviation lighting plan (v2).	NT	Wind turbine construction has not commenced as of 20 June 2025. The Lead Auditor has sighted the below documents in relation to CoA B4: 106901-01_Uungula_WF_Obstacle Lighting Risk Assessment_v1.1_230505 106901-01.1_Uungula_WF_Lighting Design Plan_v2.0_230613 - CASA Approval of the above documents dated 20 June 2023
	a	take all reasonable steps to minimise the off-site lighting impacts of the development;			
	b	ensure that any aviation hazard lighting complies with CASA's recommendations;			
	c	minimise the visual impacts of any aviation lighting by implementing measures including as appropriate in the circumstances: - partial shielding of lights; - operating the lights only at night or during times of reduced visibility; and - turning the lights on and off simultaneously; and			
	d	ensure that all external lighting associated with the development (apart from any aviation hazard lighting): - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; - uses best management practice for bat deterrence; and - complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.			
		If there is a dispute about the need for aviation hazard lighting under B4(b), including which turbines are to be lit, then either party may refer the matter to the Planning Secretary for resolution.			
B5		The Applicant must ensure that shadow flicker associated with wind turbines does not exceed 30 hours per annum at any non-associated residence.	- Auditee interviews and site inspection on 20 June 2025 - Wind turbine construction has not commenced as of 20 June 2025. Relevant documents as detailed below were discussed with the Proponent during the site inspection: 14/10/2022: Shadow Flicker Assessment prepared based on Rev 9.1 layout. Confirms shadow flicker exceeds 30 hrs/year at two receivers: <u>Alma East (WUU 012)</u> - estimated 112:12 hr/year <u>Kulpana (Holland) (UUN005)</u> - estimated 174:50 hr/yr. 18/04/2023: Updated Shadow Flicker assessment prepared based on Rev 11 layout. Confirms shadow flicker exceeds 30 hrs/year at two receivers: <u>Alma East (WUU012)</u> - estimated 38:14 h/year. <u>Kulpana (Holland) (UUN005)</u> - estimated 174.5 h/year.	C	Wind turbine construction has not commenced as of 20 June 2025. The Lead Auditor has sighted the following documents: - Shadow Flicker Assessment prepared based on Rev 9.1 layout - Shadow Flicker assessment prepared based on Rev 11 layout.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
NOISE AND VIBRATION					
B6	a	Road upgrades, construction, demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between: 7 am to 6 pm Monday to Friday;	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 11/03/2024: -Current Road Upgrade works are compliant with this condition. 4/9/2024 - An OOH work request was submitted to DPHI to allow works along Twelve Mile Road to be conducted on Saturdays and Sundays 20/9/2024: an RFI was received asking for clarification around the timing of these works 23/9/2024: a response was resubmitted to DPHI 7/11/2024: Approval received for Ilgingery Road and Twelve Mile Road works.	C	There were previous OOHW undertaken as per the below DPHI approval and in accordance with the Project EPL: - Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 - DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 - DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024 The Proponent and construction contractor confirmed during audit interviews that all works are undertaken during hours mentioned in CoA B6, no noise complaints have been recorded in the complaints register.
	b	8 am to 1 pm Saturdays; and			
	c	at no time on Sundays and NSW public holidays: unless the Planning Secretary agrees otherwise.			
B7	a	The following activities may be carried out outside the hours specified in condition B6 above: activities that are inaudible at non-associated residences;	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 11/12/2024: OOHW along Goolma Road for water and telecommunication relocations on the 12/12/2024 and 13/12/2024, as requested by the Correctional Centres. No emergency activities undertaken outside of the hours specified. - Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 - DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 - DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024	C	There were previous OOHW undertaken as per the below DPHI approval and in accordance with the Project EPL: - Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 - DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 - DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024 The Proponent and construction contractor confirmed during audit interviews that all works are undertaken during hours mentioned in CoA B6, no noise complaints have been recorded in the complaints register.
	b	the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or			
	c	emergency work to avoid the loss of life, property or to prevent material harm to the environment.			
B8		The Applicant must take all reasonable steps to minimise the construction or decommissioning noise of the development, including any associated traffic noise.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 7/11/2024: An OOH approval received for Twelve Mile Road and Ilgingery Road upgrade works. 22/01/2025: the Construction Contractor have a CNMP to manage and mitigate construction noise	C	There were previous OOHW undertaken as per the below DPHI approval and in accordance with the Project EPL: - Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 - DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 - DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024 No non-compliance was raised against B8 as per the audit findings and documentation review.
B9		The Applicant must ensure that the noise generated by any construction or decommissioning activities is managed in accordance with the requirements outlined in the Interim Construction Noise Guideline(DECC, 2009)	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 22/01/2025: the Construction Contractor has a CEMP to manage and mitigate construction noise 29/01/2025: Notification made to DPHI of non compliance with this condition. OOHW along Twelve Mile Road did not monitor noise in compliance with ICNG	NC	- The Proponent identified a non-compliance outside the audit period in relation to CoA B9 on 28/01/2025 regarding the Construction Contractor not undertaking noise monitoring in accordance with ICNG. Non-compliance was reported to DPHI on 29/01/2025 and DPHI response to the Proponent via a letter dated 10 April 2025 was sighted by the Lead Auditor. - CEMP v2, dated 30/05/2025 (the Construction Contractor CEMP - and subplans compliance - Twelve Mile Rd pre-construction work - UWF-the Construction Contractor-EHS-PLN-006 minor update was undertaken regarding noise monitoring related NCR and water monitoring.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B10		Blasting may only be carried out on site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Blasting activities undertaken on 6/6/2025 in accordance with B10. Noise monitoring undertaken.	C	The Lead Auditor sighted Drill and Blast Management Plan dated 23/03/2025. The Proponent and construction contractor confirmed during audit interviews that blasting occurred on 6/6/2025. Noise monitoring records were sighted by the lead auditor.
B11		The Applicant must ensure that any blasting carried out on site does not exceed the criteria in Table 2. [Note, incorrect reference to 'Table 2']	- Auditee interviews and site inspection on 20 June 2025 - Blasting activities undertaken on 6/6/2025 in accordance with B10. Noise monitoring undertaken.	C	The Proponent and construction contractor confirmed during audit interviews that blasting occurred on 6/6/2025. Noise monitoring records were sighted by the Lead Auditor.
B12		The Applicant must ensure that the noise generated by the operation of wind turbines does not exceed the higher of 35 dB(A) or the existing background noise level (LA90 (10-minute)) plus 5 dB(A) for each integer wind speed, measured at hub height, from cut-in to rated turbine generator power, at any non-associated residence. Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department’s Wind Energy: Noise Assessment Bulletin (2016) (or its latest version). The noise generated by the operation of the wind turbines must also be adjusted for tonality and low frequency noise in accordance with the Department’s Wind Energy: Noise Assessment Bulletin (2016) (or its latest version). However, these criteria do not apply if the Applicant has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.	- Auditee interviews and site inspection on 20 June 2025 - WTGs not constructed yet.	NT	Operations have not commenced yet. Construction phase commenced on 31 March 2025 and is ongoing with the first Independent Environmental Audit (this audit) site inspection undertaken on 20 June 2025.
B13		The noise generated by the operation of ancillary infrastructure must not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (2017) (or its equivalent).	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Current ancillary infrastructure built on site includes site offices and access tracks. Noise monitoring records including operation of ancillary infrastructure dated 8/6/2025	C	The Lead Auditor made a visual observation regarding the current ancillary infrastructure on site which included site offices and access tracks. The Lead Auditor sighted noise monitoring records in relation to CoA B13, no exceedance was noted with the noise management criteria.
B14	a	Within 6 months of the commencement of operations (or the commencement of operation of a stage, if the development is to be staged), the Applicant must: undertake noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and	- Auditee interviews and site inspection on 20 June 2025 - Operation not commenced yet. Monitoring report preparation requirement is not triggered.	NT	Operations not commenced yet therefore monitoring report requirement is not triggered.
	b	submit a copy of the monitoring results to the Department and the EPA.			
B15		The Applicant must undertake further noise monitoring of the development if required by the Planning Secretary.			
AIR					
B16		The Applicant must take all reasonable steps to:	- Auditee interviews and site inspection on 20 June 2025 - Controls in place to minimise dust generation from the construction activities. - Complaints Register June 2025	C	The Lead Auditor observed measures in place to control dust including sealed roads, sealed stockpiles and water cart presence on site during site inspection on 20 June 2025 - refer examples of photographic evidence in the audit report. The Lead Auditor has sighted the Complaints Register as of June 2025 which included dust complaints and management measures undertaken to address the complaints by the Proponent, refer section 3.6.4 of the Audit Report.
	a	minimise the off-site dust, fume and blast emissions of the development;			
	b	minimise the surface disturbance of the site.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
SOIL AND WATER					
B17		The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.	- Auditee interviews and site inspection on 20 June 2025 - Water permits in place.	C	The Lead Auditor has sighted water access permits during the interviews with the auditees on 20 June 2025. in relation to CoA B17. The Audit has reviewed the works in accordance with the consent conditions B17 to B19. The relevant documents sighted including: - Construction Environmental Management Plan Rev 02 dated 30/05/2025 - Erosion and sediment control plans prepared and implemented by the construction contractor as evident during the site inspection on 20 June 2025 - Water access licences (dated 05/06/2008, 1/12/2020, 10/09/2014, which were outside the audit period) - Water meter records (dated 01/05/2025 and 06/06/2025) - Water supply work and water use approval dated 01/07/2004 and expiry 28/03/2028 (outside the audit period) - Pre and post rain inspection records prepared by the construction contractor (dated 15/05/2025)
		<i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</i>			
B18		Unless an EPL authorises otherwise, the Applicant must comply with Section 120 of the POEO Act. Note: Section 120 of the POEO Act makes it an offence to pollute any waters.	- Auditee interviews and site inspection on 20 June 2025 29/05/2024: Environmental Protection Licence (EPL) 21862 obtained and active for the site	C	The Lead Auditor has sighted the Project EPL 21862.
B19		The Applicant must:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 20/9/2024: All sections of road upgrades have had a Certified Professional of Erosion and Sediment Control (CPESC) endorsed Erosion and Sediment Control (ESC) Plan. 22/01/2025: Contractors have CEMP detailing the Soil and Water Management Measures 20/9/2024: All sections of road upgrades have had a CPESC endorsed ESC Plan. 29/10/2024: culverts and road drainage along road upgrades are built in accordance with the relevant guidelines. 29/10/2024: Spills have been cleaned up and Recorded in Archer	C	The Lead Auditor has sighted approved CEMP which details soil and water measures and Erosion and Sediment Controls being implemented during site inspection on 20/06/2025, refer example photographs in Appendix E. Records of spill management have been sighted during the site inspection and documentation review.
	a	minimise erosion and control sediment generation;			
	b	ensure the wind turbine pads, ancillary infrastructure, access roads and any other land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions;			
	c	ensure all waterway crossings are constructed in accordance with the Water Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), unless DPIE Water agrees otherwise;			
	d	ensure the concrete batching plants and substation are suitably bunded; and			
	e	minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
BIODIVERSITY					
B20		The Applicant must:	Auditee interviews and site inspection on 20 June 2025	C	The Lead Auditor has sighted document titled 'SQE UWF Internal Audit Report dated October 2024' in relation to CoA B20 detailing the updated impacts based on the last Vegetation Intersects provided to on 14 June 2024, include a maximum impact to BC Act listed vegetation = 20.57 ha and maximum impact to EPBC Act listed vegetation = 10.9 ha. Clearing Impacts are currently being tracked throughout construction period as sighted within the following documents: - Environmental Management Strategy EMS v4, dated 19/06/2023, approved by DPHI dated 27/06/2023 - Biodiversity Management Plan v5 dated 31/08/2023, approved by DPHI dated 22/09/2023 - Bird and Bat Adaptive Management Plan v6a, dated 22/01/2024, approved by DPHI dated 22/02/2024 - Pre-clearance checklist dated 29/05/2025 for Civil Area 2 prepared by the construction contractor - Pre-construction commencement checklist (hold point release) dated 29/04/2025 prepared and released by the Construction Contractor - Revised offsets liability request was made by the Proponent to DPHI on 19/05/2023 and was accepted by DPHI on 15/06/2023. - Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 20/12/2024 - UWF-NACAP-CIV-PLN-0027_7 Clearing and Measurement Plan rev 7 dated 18/03/2025
	a	ensure that no more than: 29-28.73 hectares (ha) of BC Act listed White-Box-Yellow Box-Blakely's Red Gum Woodland CEEC; 14.15 13.88 ha of EPBC Act listed White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC; is cleared for the development; and	Relevant documents as detailed below were discussed with the Proponent during the site inspection: 26/08/2022: email and spreadsheet with computations of vegetation clearing for Twelve mile road (Biodiversity Conservation (BC) Act & Environment Protection and Biodiversity Conservation (EPBC) Act Threatened Environmental Communities (TECs) and threatened species). 17/04/2023: Contract schedule 21 contains calculations of vegetation clearing for whole of development. - Max impact to BC Act listed vegetation = 19.94 ha. - Max impact to EPBC Act listed vegetation = 10.27 ha. - Clearing Impacts to be tracked through construction. 28/10/2024: Updated impacts based of last Veg Intersects provided to BCS (14 June 2024) - Max impact to BC Act listed vegetation = 20.57 ha. - Max impact to EPBC Act listed vegetation = 10.9 ha. - Clearing Impacts to be tracked through construction.		
	b	minimise: - the impacts of the development on hollow-bearing trees; - the impacts of the development on threatened bird and bat populations; and - the clearing of native vegetation and key habitat.			
B21		Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must:	Auditee interviews and site inspection on 20 June 2025	C	The updated baseline mapping was approved by the Planning Secretary in a letter dated 23/09/2021. There were no changes to the baseline vegetation mapping. The approved Baseline Vegetation Mapping file was provided to the auditor during the site inspection "GDA2020_UWF_RegionalVegMapping_v2". The Lead Auditor has sighted the documentation related to the Approval of the calculations of offset credit liability dated 17/01/2025.
	a	update the baseline mapping of the vegetation and key habitat within the development corridor;	Relevant documents as detailed below were discussed with the Proponent during the site inspection: - The updated baseline mapping was approved by the Planning Secretary in a letter dated 23/09/2021. There were no changes to the baseline vegetation mapping. - The approved Baseline Vegetation Mapping file is "GDA2020_UWF_RegionalVegMapping_v2".		
	b	calculate the biodiversity offset credit liabilities for the development in accordance with the Framework for Biodiversity Assessment under the NSW Biodiversity Offset Policy for Major Projects, in consultation with The Department's Biodiversity, Conservation and Science Directorate (BCS), and to the satisfaction of the Planning Secretary.	- Interim offset liabilities have been calculated based on the EIS Disturbance footprint. The liabilities will be further refined once the final disturbance footprint is locked in. 19/05/2023: Email sent to BCS (David Geering) outlining steps taken to date to calculate the final biodiversity offset credit liability for the development. Refer to email on file and attachments provided in email. 15/06/2023: A letter was received from BCS noting that "BCS is satisfied with the approach to recalculating the offset requirements for Uungula Wind Farm is sound". - Liability not yet approved by the NSW Planning Secretary. 25/6/2024: Updated clearing calculation (revised disturbance footprint) spreadsheet was sent to BCS via email for acceptance. 04/07/2024: Revised Disturbance Footprint shapefiles were provided to BCS. 10/01/2025: Statement of reasonable equivalence received 13/1/2025: Submitted offset calculations, BCS consultation and Statement of Assessment of Reasonable Equivalence (SARE) to Department 17/01/2025: Secretary Approval received for the calculations of offset credit liability		

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B22		Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must retire the biodiversity credits. The retirement of the credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects, and can be achieved by:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Credit Option Deed is in place to provide part of the credit liability. - Remaining credits to be obtained via payment into the BCF (below). - All credits have been retired/ payments made into the Fund according to the SARE approved in B21. 'Making payments into an offset fund that has been established by the NSW Government' forms part of the intended offset strategy. 'Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme' is not proposed to form part of the offset strategy.	C	The Lead Auditor has sighted documentation related to Biodiversity Offset Credit Liability dated 17/01/2025.
	a	acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016;			
	b	making payments into an offset fund that has been established by the NSW Government; or			
	c	funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.			
		<i>Note: Following repeal of the TSC Act on 25 August 2017, credits created under that Act are taken to be 'biodiversity credits' under the Biodiversity Conservation Act 2016, in accordance with clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</i>			
B23		Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 23/11/2022: The Biodiversity Management Plan (BMP) (version 001) was submitted to the Planning Secretary for approval. 17/04/2023: Comments were received from DPE in Feb 2023 and currently being addressed in BMP v002. 31/05/2023: BMP v002 submitted. 9/06/2023: Comments received from DPE on BMP v002. 15/06/2023: BMP v003 submitted. 24/07/2023: BMP v004 submitted. 31/08/2023: BMP v005 submitted. 22/09/2023: BMP v005 approved by Planning Secretary.	C	The Lead Auditor has sighted the approved Biodiversity Management Plan v005 and its implementation during the site inspection.
	a	be prepared in consultation with BCS; and			
	b	include: - description of the measures that would be implemented for: - minimising the amount of native vegetation clearing within the approved development footprint; - minimising the loss of key fauna habitat, including tree hollows; - minimising the impacts on fauna on site, including undertaking pre-clearance surveys; - minimising the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; - rehabilitating and revegetating temporary disturbance areas; - protecting native vegetation and key fauna habitat outside the approved disturbance area; - maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site; - collecting and propagating seed (where relevant); - controlling weeds and feral pests; - controlling erosion; and - bushfire management; - a detailed program to monitor and report on the effectiveness of these measures. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B24		Prior to the commissioning of any wind turbines, the Applicant must prepare a Bird and Bat Adaptive Management Plan for the development in consultation with BCS, and to the satisfaction of the Planning Secretary. This plan must include:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 11/04/2023: BBAMP Draft v3 was submitted to BCS for consultation. 26/04/2023: BCS provided feedback. 20/09/2023: BBAMP Draft v5 submitted to BCS for review. 13/10/2023: BCS provided a letter stating that the BCS "are generally satisfied that the document is adequate". 26/10/2023: The two matters are being clarified via a minor update to the BBAMP. After this is complete, the BBAMP will be submitted to the Planning Secretary for approval. 30/10/2023: BBAMP v6 emailed to BCS for approval. 30/10/2023: BCS issued a letter approving BBAMP v6. 31/10/2023: BBAMP v6 submitted to DPE via Major Project Portal. 22/02/2024: BBAMP V6a Approved by DPE	C	The Lead Auditor has sighted approved Bird and Bat Adaptive Management Plan.
	a	at least 12 months' worth of baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could be affected by the development;			
	b	a detailed description of the measures that would be implemented on site for minimising bird and bat strike during operation of the development, including: - minimising the availability of raptor perches on wind turbines; - prompt carcass removal; - controlling pests; and - using best practice methods for bat deterrence, including managing potential lighting impacts;			
	c	trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations;			
	d	an adaptive management program that would be implemented if the development is having an adverse impact on a particular threatened or 'at risk' bird and/or bat species or populations; including the implementation of measures to: - reduce the mortality of those species or populations (including detailed consideration of favourable eucalyptus flowering events); or - enhance and propagate those species			
	e	a detailed program to monitor and report on: - the effectiveness of these measures; and - any bird and bat strikes on site;			
	f	provisions for a copy of the all raw data collected as part of the monitoring program to be submitted to BCS and the Planning Secretary. Following the Planning Secretary's approval, the Applicant must implement the Bird and Bat Adaptive Management Plan.			
HERITAGE					
B25		The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - HMP details the measures to ensure no direct or indirect impacts to those Aboriginal Heritage items. - A salvage program is described in Section 3.2 of the HMP. 16/02/24: A heritage salvage program current underway, with a planned completion date of 31/03/24 24/01/2025: Site Salvage Program Finished. Final Salvage report received.	C	The Lead Auditor has sighted approved Heritage Management Plan Rev005 being implemented for the development. Salvage related documents were sighted during the inspection and during audit documentation review. The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). There was no evidence available during the audit regarding submission of the Final Salvage Report to relevant agencies and the RAPs. An Observation was raised, refer Table 7 within the Audit Report. ASIRFs were included in the Final Salvage Report however there was no evidence available regarding submission of ASIRFs to Heritage NSW. An Observation was raised, refer Table 7 within the Audit Report.
		<i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6.</i>			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B26		Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Heritage Management Plan dated 04/07/2022 (v004) was approved by the DPHI on 02/08/2022. Refer to plan and approval letter on file. 06/09/2024: HMP Rev005 Approved by the Planning Secretary 28/6/2021 - Request to DPIE seeking approval of NSW Archaeology to prepare HMP. 5/07/2021 - DPIE letter approves NSW Archaeology to prepare HMP. - Refer to the Consultation Log, and the HMP (Section 1.2, Appendix B) for consultation details.	C	The Lead Auditor has sighted approved Heritage Management Plan Rev005 being implemented for the development. Salvage related documents were sighted during the inspection and during documentation review.
	a	be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;			
	b	be prepared in consultation with Heritage NSW and Aboriginal stakeholders;			
	c	include a description of the measures that would be implemented for: - protecting the Aboriginal items identified in Table 1 in Appendix 6, including fencing off the items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, and protecting any items located outside the approved development corridor; - minimising and managing the impacts of the development on Aboriginal heritage items within the development corridor, including: - undertaking test excavations and salvage (if required) at the landform units identified in Table 3 in Appendix 6, where impacts cannot be avoided; - a strategy for the long-term management of any Aboriginal and European heritage items or material collected during the test excavation or salvage works; - a contingency plan and reporting procedure if: - Aboriginal heritage items outside the approved disturbance area are damaged; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan;			
	d	a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
TRANSPORT					
B27		All over-dimensional associated with the development must travel to and from the site via Golden Highway, Saxa Road, Mitchell Highway, Goolma Road, Twelve Mile Road and the approved site access point off Twelve Mile Road, as identified in the 'Indicative OSOM Route' and 'Project Access Route' in the figure in Appendix 8, unless the Planning Secretary agrees otherwise.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 17/04/2023: No Over Size and Over Mass vehicles have travelled to the site to date. - The approved TMP and the Contractor's plans reflect this requirement and provide measures, as sighted.	C	The Lead Auditor has sighted the approved Traffic Management Plan and geofence GPS data in relation to travel routes used by the project vehicles in accordance with the CoA B27.
		Notes: - The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over dimensional vehicles on the road network. - To avoid any doubt, this consent does not allow the use of Twelve Mile Road east of the approved site access point off Twelve Mile Road for over-dimensional access unless the Planning Secretary agrees otherwise.			
B28		All heavy and light vehicles associated with the development must travel to and from the site via Twelve Mile Road (west) and the approved site access point off Twelve Mile Road, as identified by the 'Project Access Route' in the figure in Appendix 8, unless the Planning Secretary agrees otherwise.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 29/10/21: DPHI approval granted for temporary use of alternate roads for pre construction activities. Letter dated 28/10/21. 29/04/2022: Extension request #1 submitted to DPIE 4/05/2022: DPHI issue a request for information (RFI) 10/5/2022: UWF provides response to RFI. 12/05/2022: Second RFI issued. 18/05/2022: RFI response provided. 20/06/2022: Approval granted by DPIE 24/06/2022: Extension request #2 submitted 06/07/2022: Approval granted by DPIE 18/01/2023: Extension request #3 submitted 29/03/2023: Approval granted by DPE 26/10/2023: No non-compliance with this condition to date. 24/11/2023: Extension request #4 submitted 01/12/2023: Approval granted by DPE 19/2/2024: Extension request #5 submitted 01/03/2024: Approval granted by DPE 29/05/2024: Extension request #6 submitted 06/06/2024: Approval granted by DPHI 19/11/2024: Extension request #7 submitted 20/12/2024: Approval granted by DPHI	C	The Lead Auditor has sighted documentation related to the approval of temporary use of alternate roads for pre-construction activities, DPHI letters to the Proponent on various dates.
		Note: To avoid any doubt, this consent does not allow the use of Twelve Mile Road east of the approved site access point off Twelve Mile Road for heavy or light vehicle access, unless the Planning Secretary agrees otherwise.			
B29	a	Uungula Road, Wuuluman Road and Ilgingery Road must only be used by over-dimensional, heavy and light vehicles at the following locations to allow access between portions of the site: the secondary intersection on Uungula Road. the crossing points of the two secondary intersections on Uungula Road;	Auditee interviews and site inspection on 20 June 2025	C	The Lead Auditor has sighted documentation related to the approval of temporary use of alternate roads for pre-construction activities, DPHI letters to the Proponent on various dates.
	b	the four secondary intersections on Ilgingery Road; and			
	c	between secondary intersection (A) and secondary intersection (C) on Ilgingery Road. In addition, heavy vehicles and light vehicles may use Uungula Road, Wuuluman Road and Ilgingery Road for the purposes of upgrading the intersections in B29(a) and B29(b) above.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B30		Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must implement the road upgrades identified in Appendix 7, to the standard and satisfaction of the relevant roads authority. If there is a dispute about the road upgrades to be implemented, or the implementation of these upgrades, then either party may refer the matter to the Planning Secretary for resolution.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 17/04/2023: Road upgrades not yet implemented. Construction not commenced. 26/10/2023: SQE sought Planning Secretary Agreement to complete the Goolma Rd / Twelve Mile Road intersection upgrade after commencing the construction of the wind farm. 24/11/2023: DPE granted Approval with the following conditions - As long the new intersection is constructed and the old intersection is removed and closed prior to the route being used for OSOM; and - Subject to the TMP being updated in consultation with TfNSW and Council, approved and implemented to safely manage construction traffic: - o prior to construction commencing (for construction stage prior to OSOM); and - o further updated prior to SOM using the new intersection. 17/01/2025: SQE submitted a request to DPHI seeking Planning Secondary agreement to commence some Transgrid construction activities prior to completing the TMR upgrades. RFI's were received and responded to. 03/03/2025: DPHI granted an approval for particular Transgrid Construction works to commence prior to completing the Twelve Mile Road and site access road upgrades. Subject to Conditions. 24/03/2025: Dubbo Regional Council and TfNSW provided email with acceptance of Twelve mile road and site access point being implemented to their satisfaction.	C	The Lead Auditor has sighted the following approval documents in relation to CoA B30: - Completion of Goolma Road and Twelve Mile Road intersection upgrade after commencing the construction of the wind farm. - Commencement of Transgrid construction activities prior to completing the Twelve Mile Road upgrades. - DRC and TfNSW acceptance letters of Twelve Mile Road and site access point implementation
B31		The Applicant must: undertake an independent dilapidation survey to assess the: - existing condition of Twelve Mile Road on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29, prior to construction, upgrading or decommissioning works; and - condition of Twelve Mile Road on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29: a - within 1 month of the completion of any construction, upgrading or decommissioning works; - on an annual basis during construction works; - rehabilitate and/or make good any development-related damage	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - An External Pre-Construction Road Dilapidation report was prepared by iCubed in Nov 2022 covering the following roads: Twelve Mile Road, Wuuluman Rd, Uungula Rd, Ilgingery Rd. 17/05/2023: The pre-construction dilapidation survey report was submitted via the Major Project Portal. 14/06/2023: DPE provided letter approval of the Dilapidation Survey report. - Repairing of roads was not triggered during the reporting period.	C	The Lead Auditor has sighted pre-construction road dilapidation survey titled '19-142-UWF-External Road Dilapidation Report-V1.0', and the DPHI approval of the Dilapidation Survey Report dated 14/06/2023.
	b	repair Twelve Mile Road, on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29, if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works;			
		in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B32		The Applicant must ensure any unformed Crown road reserves affected by the development are maintained for future use, unless otherwise agreed with the DPIE Crown Lands.	- Auditee interviews and site inspection on 20 June 2025 17/04/2023: No Crown road reserves will be impacted.	C	the Proponent confirmed to the Lead Auditor that no Crown road reserves will be impacted however there was no evidence available at the time of documentation review.
B33	a	Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include: details of the transport route to be used for all development-related traffic;	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Draft TMP was submitted to the Planning Secretary for approval on 27.04.2022. - The submission included a Consultation Log, indicating the consultation undertaken with DRC and TfNSW. The DRC and TfNSW comments are saved on file in B33. 14/07/2022: After several RFI's, the TMP v003 was approved by the DPE - refer to letter dated 13.07.2022. 22/08/2023 TMP v4 submitted to the TfNSW for consultation, including OSOM Management Plan updates	C	The Lead Auditor has sighted the approved Traffic Management Plan and geofence GPS in relation to the CoA B27.
	b	details of the road upgrade works required by condition B30 of Schedule 2 of this consent;			
	c	details of the measures that would be implemented to: - minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: - details of the dilapidation surveys required by condition B31 of Schedule 2 of this consent; - temporary traffic controls, including detours and signage; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential cumulative traffic impacts with other State significant development projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; - minimising dirt tracked onto the public road network from development-related traffic; - details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; - encouraging car-pooling or ride sharing by employees; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - ensuring loaded vehicles entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. • <u>comply with the traffic conditions in this consent:</u>			
	d	include a drivers code of conduct that addresses: - travelling speeds; - procedures to ensure that drivers to and from the development adhere to the designated over dimensional and heavy vehicle routes; - procedures to ensure that drivers to and from the development implement safe driving practices; and - include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
AVIATION					
B34		The Applicant must carry out the development in accordance with the National Airports Safeguarding Framework Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers, or its latest version, unless the Secretary agrees otherwise.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 17/04/2023: The development has been assessed in accordance with this requirement and will be carried out in accordance with this requirement. 20/06/2025 - Wind turbines have not been constructed yet.	NT	No WTGs have been constructed as evident during the site inspection on 20 June 2025.
B35	a	Prior to the construction of any wind turbine or wind monitoring mast, the Applicant must provide the following information to CASA, Airservices Australia, and the RAAF (together the authorities): co-ordinates in latitude and longitude of each wind turbine and mast;	- Auditee interviews and site inspection on 20 June 2025 20/06/2025: No masts or wind turbines constructed to date.	NT	No WTGs have been constructed as evident during the site inspection on 20 June 2025.
	b	the final height of each wind turbine and mast in Australian Height Datum;			
	c	ground level at the base of each wind turbine and mast in Australian Height Datum;			
	d	confirmation of compliance with any OLS; and			
	e	details of any proposed aviation hazard lighting.			
B36	a	Within 30 days of the practical completion of any wind turbine or mast, the Applicant must: provide confirmation to the authorities that the information that was previously provided remains accurate; or	- Auditee interviews and site inspection on 20 June 2025 20/06/2025: No masts or wind turbines constructed to date.	NT	No WTGs have been constructed as evident during the site inspection on 20 June 2025.
	b	update the information previously provided.			
RADIO COMMUNICATIONS					
B37		If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following the disruption of the service unless the relevant service provider or user or Planning Secretary agrees otherwise. 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 Planning Secretary for resolution	- Auditee interviews and site inspection on 20 June 2025 20/06/2025: No masts or wind turbines constructed to date.	NT	No WTGs have been constructed as evident during the site inspection on 20 June 2025.
HAZARDS					
B38	a	Prior to commencing construction of the battery storage facility, the Applicant must undertake a Final Hazard Analysis (FHA) for the battery storage facility in consultation with the Department and to the satisfaction of the Planning Secretary. The Final Hazard Analysis must: be prepared in accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 6 – Hazard Analysis and Multi-Level Risk Assessment;	- Auditee interviews and site inspection on 20 June 2025 20/06/2025: Battery not proposed for construction as yet.	NT	No WTGs or BESS have been constructed as evident during the site inspection on 20 June 2025.
	b	include blade throw risks from wind turbines;			
	c	consider recent developments in research and standards for battery energy storage systems; and			
	d	describe the final design of the battery storage facility.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B39	a	Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must: be consistent with the: • Department’s Hazardous Industry Planning Advisory Paper No. 2 ‘Fire Safety Study’ guideline; • NSW Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and	• Auditee interviews and site inspection on 20 June 2025 • 20/06/2025: Battery not proposed for construction as yet.	NT	No WTGs or BESS have been constructed as evident during the site inspection on 20 June 2025.
	b	describe the final design of the battery storage facility. Following the Planning Secretary’s approval, the Applicant must implement the measures described in the Fire Safety Study.			
B40	a	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: the requirements of all relevant Australian Standards; and	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • 3/4/24: Temporary Site office constructed for Twelve Mile Road upgrade works. Chemical storage was inspected as part of a pre-construction site audit and found to be suitable. Only spray cans kept on site to-date. • 20/6/25: Site compound has been relocated to 1360 Twelve Mile Road. New workshop and site laydown area being constructed.	C	The Lead Auditor observed all dangerous goods and chemicals with appropriate bunds and spill kits were available during site inspection. Document titled 'Workshop Laydown Fuel Storage Site Layout' was sighted by the Lead Auditor.
	b	the NSW EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.			
B41	a	The Applicant must: minimise the fire risks of the development, including managing vegetation fuel loads on-site;	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • Refer to the Emergency Plan (Condition B42 below)which was developed in consultation with the RFS. To be revisited again prior to commencing 'construction' on the wind farm site. • No fire in the vicinity to date	C	The Lead Auditor has sighted the approved Emergency Plan in relation to B41. the Proponent confirmed that there has been no fire in the vicinity of the development till date.
	b	ensure that the development: • complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road;			
	c	develop procedures to manage potential fires on site, in consultation with the RFS;			
	d	assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and			
	e	notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B42		Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry point at all times. The plan must:	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • 02/08/2022: The Emergency Plan (EP) dated 22 June 2022, Version 1.0 was accepted by the Minister in a letter dated 02/08/2022. EP developed in consultation with the RFS. • 22/1/2025: EP updated and provided to RFS for consultation feedback. Awaiting response • Per the approved Emergency Plan - the battery forms a different stage of the development and therefore has not been addressed in the Plan. Refer also to Condition C3 regarding staging of the wind farm and battery facility.	C	The Lead Auditor has sighted the approved Emergency Plan in relation to B41. the Proponent confirmed that the battery forms a different stage of the development and therefore has not been addressed in the Plan. As per the approved Environmental Management Strategy section 1.2 and a letter titled 'Staging of Strategies, Plans and Programs Approval' the BESS (stage 2) of the development has not commenced.
	a	be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);			
	b	identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;			
	c	include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;			
	d	list works that should not be carried out during a total fire ban;			
	e	include availability of fire suppression equipment, access and water;			
	f	include procedures for the storage and maintenance of any flammable materials;			
	g	detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;			
	h	include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank;			
	i	include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations;			
	j	include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;			
	k	include bushfire emergency management planning;			
	l	include details of the how RFS would be notified, and procedures that would be implemented, in the event that: •there is a fire on-site or in the vicinity of the site; •there are any activities on site that would have the potential to ignite surrounding vegetation; or •there are any proposed activities to be carried out during a bushfire danger period; and			
	m	include details on how the battery storage facility and sub-systems can be safely isolated in an emergency; Following approval, the Applicant must implement the Emergency Plan.			
B43	a	The Applicant must: 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 or the battery storage facility; and	• Auditee interviews and site inspection on 20 June 2025 B43a requirement not triggered therefore Safety Management System has not been prepared yet, but will be prepared prior to commissioning.	NT	The Proponent stated that the Safety Management System for the development will be prepared prior to commissioning of wind turbines on site.
	b	implement and, if necessary, update the system over the remaining life of the development.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
WASTE					
B44	a	The Applicant must: minimise the waste generated by the development;	• Auditee interviews and site inspection on 20 June 2025 • CEMP including waste management being implemented for all activities on site by the Construction Contractor.	C	The Lead Auditor has sighted the approved CEMP and subplans including waste management measures being implemented for all activities on site by the Construction Contractor.
	b	classify all waste generated on site in accordance with the EPA’s Waste Classification Guidelines 2014 (or its latest version);			
	c	store and handle all waste generated on site in accordance with its classification;			
	d	not receive or dispose of any waste on site; and			
	e	remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.			
ACCOMMODATION AND EMPLOYMENT STRATEGY					
B45	a	Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy (AES) for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must: propose measures to ensure there is sufficient accommodation for the workforce associated with the development;	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • AES was prepared in consultation with Dubbo Regional Council. • 31/03/2023: DRC approved the AES Rev C. • 03/04/2023: AEC Rev C submitted to the DPE along with the DRC consultation log & evidence. • 17/04/2023: Currently awaiting approval from DPE. • 15/06/2023: AES Approval letter received from DPE. • Refer to AES document.	C	The Lead Auditor has sighted the approved Accommodation and Employment Strategy Rev 0 dated 9/06/2023 in relation to CoA B45.
	b	consider the cumulative impacts associated with other State significant development projects in the area;			
	c	investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and			
	d	include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. Following the Planning Secretary’s approval, the Applicant must implement the Accommodation and Employment Strategy.			
DECOMMISSIONING AND REHABILITATION					
B46		Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3. [Note, incorrect reference to Table 3].	• Auditee interviews and site inspection on 20 June 2025	NT	As evident on site during the site inspection, operations have not commenced yet.
B47	a	The Applicant must: rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • Rehabilitation is not triggered yet. • 30/09/2024: Staging of Road upgrade works has factored in exposure and been timed to minimise as much as possible. • 30/09/2024: CPESC endorsed ERSED plans have been created and applied to road upgrade works, to minimise soil erosion. • Water carts are used to minimise dust generation. • Wind turbines have not been constructed yet • Operations have not commenced yet	C	As evident on site during the site inspection, rehabilitation is not triggered, CPESC endorsed ERSED Plans were being implemented, water carts were in use for dust suppression, weed hygiene practices were implemented and operations have not commenced yet.
	b	minimise the total area exposed at any time; and			
	c	where it is not possible to carry out measures for permanent rehabilitation, employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion until such time that it is.			
B48		Any individual wind turbines which cease operating for more than 12 consecutive months must be dismantled within 18 months after that 12 month period, unless the Planning Secretary agrees otherwise.	• Auditee interviews and site inspection on 20 June 2025 • Operations have not commenced yet	NT	As evident on site during the site inspection, operations have not commenced yet.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
ENVIRONMENTAL MANAGEMENT					
C1	a	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: provide the strategic framework for environmental management of the development;	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 05/01/2023: The EMS (version 001) was submitted to the Planning Secretary for approval (PA-14). DPE provided comments in March 2023. 03/04/2023: A revised EMS (version 002) was submitted to DPE along with responses to comments. 17/04/2023: DPE approval pending. 1/06/2023: DPE provided comments on EMS v002. 8/06/2023: Updated EMS v003 submitted to DPE. 15/06/2023: DPE provided comments on EMS v003. 19/06/2023: EMS v004 submitted back to DPE for approval. 27/06/2023: EMS v004 was approved by the NSW Planning Secretary. Refer to approval letter on file. - Refer to EMS, approved by Planning Secretary 27/06/2023.	C	The Lead Auditor has sighted the approved EMS v004 in relation to the CoA C1.
	b	identify the statutory approvals that apply to the development;			
	c	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;			
	d	set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and			
	e	include: (i) reference to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent.			
		Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.			
C2	a	The Applicant must: update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and	- Auditee interviews and site inspection on 20 June 2025 17/04/2023: No upgrading or decommissioning has occurred.	C	the Proponent has confirmed that there was no upgrading or decommissioning activities on site till date, Modification 1 and 2 were approved on 21/4/22 and 5/12/22, respectively. There was no revision to the approved plans required as a result of modifications. The Proponent identified a non-compliance in relation to CoA B9 on 28/01/2025 (outside the audit period) regarding the Construction Contractor not undertaking noise monitoring in accordance with ICNG. Non-compliance report, DPHI response to the Proponent via a letter dated 10 April 2025 was sighted by the Lead Auditor.
	b	- review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 3 month of the: • submission of an incident report under condition C10 of Schedule 2; • submission of an audit report under condition C15 of Schedule 2; or • any modification to the conditions of this consent.	- Auditee interviews and site inspection on 20 June 2025 - Modification 1 was approved on 21/04/2022. No management plans, strategies or programs had been approved at this time. - Modification 2 was approved on 5/12/2022. Approved management plans HMP, TMP, ERP reviewed on 03/01/2023 in accordance with Condition C2. No revision to the plans is required.		

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
C3	a	With the approval of the Planning Secretary, the Applicant may: prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v4b, dated 22/08/2024, approved 7/11/2024 • All updates have been submitted via the Major Projects portal with consultation from the relevant agencies.	C	The Lead Auditor has sighted the following documents in accordance with CoA C3: • DPHI letter of approval to submit the plans on a staged basis per the request. • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v4b, dated 22/08/2024, approved 7/11/2024
	b	combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and			
	c	update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).			
C4		If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. • This condition was not triggered for the reporting period	NT	CoA C4 has not been triggered. The Lead Auditor has sighted the following documents in accordance with CoA C4: • As per the approved Environmental Management Strategy section 1.2 and a letter dated 15/03/2022 titled 'Staging of Strategies, Plans and Programs Approval' the BESS (stage 2) of the development has not commenced.
C5		If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	• Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery Energy Storage System (BESS). • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request.	C	The Lead Auditor has sighted the following documents in accordance with CoA C5: • DPHI letter dated 15/03/2022 of approval to submit the plans on a staged basis per the request.
C6		If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	• Auditee interviews and site inspection on 20 June 2025 • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request.	C	The Lead Auditor has sighted the following documents in accordance with CoA C3: • DPHI letter dated 15/03/2022 of approval to submit the plans on a staged basis per the request.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
NOTIFICATIONS					
C7		Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	- Auditee interviews and site inspection on 20 June 2025 28/3/25: Commencement Date notified to DPHI as the 31 March 2025 via letter in the portal	C	The Lead Auditor has sighted a letter of notification to DPHI regarding commencement of construction dated 28 March 2025 and DPHI's response to the Proponent via a letter dated 01/04/2025. Date of commencement listed in the letter was 31 March 2025.
C8		Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including:	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: - Final Layout Plan (v001) was submitted to the Department via the portal. - The Final Layout Plan was revised (v002) in response to DPE comments.	C	The Lead auditor has sighted the Final Layout Plan Rev 2A dated 7/11/2023.
	a	details on siting of wind turbines, including micro-siting of any wind turbines and/or ancillary infrastructure (including wind monitoring masts);			
	b	the GPS coordinates of the wind turbines; and			
	c	showing comparison to the approved layout.			
		The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.			
C9		Prior to commencing operations or following the upgrades of any wind turbines or ancillary infrastructure, the Applicant must submit work as executed plans of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.	- Auditee interviews and site inspection on 20 June 2025 - Operations not yet commenced	NT	Operation not commenced yet.
C10		The Department must be notified via the Major Projects website portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 9.	- Auditee interviews and site inspection on 20 June 2025 - Applicant is not aware of any reportable incident that has occurred on the site to date.	NT	The Lead Auditor has sighted Monthly Report for May 2025 which details 12 minor incidents occurred on site till date. As evident in the project monthly reports, the Proponent reported that there were no reportable incidents occurred on site.
C11		The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	- Auditee interviews and site inspection on 20 June 2025 29/01/2025: Notification of non compliance submitted via Portal against condition B9	C	The Lead Auditor sighted DPHI response to the Proponent's notification of non-compliance outside the audit period against condition B9 via a letter dated 10/04/2025.
C12		A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	- Auditee interviews and site inspection on 20 June 2025 29/01/2025: Notification of non compliance submitted via Portal against condition B9	C	The Lead Auditor sighted DPHI response to the Proponent's notification of non-compliance outside the audit period against condition B9 via a letter dated 10/04/2025.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
C13		A non-compliance which has been notified as an incident does not need to also be notified as a non- compliance.	- Auditee interviews and site inspection on 20 June 2025 29/01/2025: Notification of non compliance submitted via Portal against condition B9	NT	No notifiable incidents occurred till date. The Lead Auditor sighted notification of non-compliance that occurred outside the reporting period against condition B9 via a letter dated 10/04/2025.
C14	a	Prior to the commencement of construction, the Applicant must notify the owners of: the land listed in Table 1 and Table 2 of the conditions of this consent of their rights under condition B1 and B2 of Schedule 2; and Note: Table 1 was deleted in Mod 1. Note: Table 2 related to blasting criteria, and had no relationship to visual mitigation or landowner rights.	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: 31/10/2023: Draft letter has been prepared - in Compliance Tracking folder 'C14 Landowner notification'. 22/1/2025: a) is an outdated reference from Mod 1 and is no longer relevant	C	The Lead Auditor has sighted the evidence of consultation within the relevant management plans (further details are noted against each condition below): - B21a - Baseline mapping. Consultation with BCS. - B21b - Credit liabilities. Consultation with BCS. - B23 - BMP. Consultation with BCS. - B24 - BBAMP. Consultation with BCS. - B26 - HMP. Consultation with Heritage NSW. - B31 - Repair of damaged roads - B33 - TMP. Consultation with DRC and TfNSW. - B38 - Fire Hazard Analysis (battery) - B41 - Procedures to manage potential fires. Consultation with RFS. - B45 - Accommodation and Employment Strategy. DRC.
	b	any non-associated residence within 5 km of any approved wind turbine of their rights under condition B2 of Schedule 2.	04/03/2025: Letter sent to DPHI via Major Projects Planning portal, advising of the errors within Condition C14a. Confirmation of receipt was requested. 22/01/2025: Updated letter and recipients provided to team. 5/3/25: letters were emailed to non associated residences within 5 km.		
INDEPENDENT ENVIRONMENTAL AUDIT					
C15		Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary	- Auditee interviews and site inspection on 20 June 2025 2/12/2024: DPHI provided endorsement of HBI as independent Auditors for the Construction Audit.	C	The Independent Auditors have been approved by DPHI on 2/12/2024.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
ACCESS TO INFORMATION					
C16		The Applicant must: make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; (vi) 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; (vii) a complaints register, which is to be updated on a monthly basis; (viii) minutes of CCC meetings; (ix) the annual Statement of Compliance with the EPL; (x) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and	- Auditee interviews and site inspection on 20 June 2025 Relevant documents as detailed below were discussed with the Proponent during the site inspection: i) EIS - On the website. ii) Final layout plans - v002 published on 07/11/2023. iii) Current Statutory approvals - Consent Mod 1, Mod 2 and EPBC approval are on the website. iv) Approved Strategies, plans or programs: TMP v003 (& approval dated 13.07.2022). EMS v004, approved on 27/06/2023, published 29/06/2023. BMP v005, approved 22/09/2023, published 25/09/2023. AES v0, approved 14/06/2023, published 16/06/2023. BBAMP V6a, Approved 22/02/2024, published 26/02/2024 v) The proposed staging plans for the development: Approved staging march 2022. vi) Monitoring results - None yet available. vii) Complaints Register - On the Website. viii) Minutes of CCC meetings - On the website. ix) Annual Statement of Compliant with EPL - None yet available. x) Independent Environmental Audit - to be updated once final audit report is received. • 10/01/2025: Website audit completed showing compliance. xi) Other matters: 06/06/2023: Secretary requested the pre-construction Road Dilapidation survey be published online. 7/11/2024: Secretary requested the OOHW approvals for Ilgingery d and TMR works be published online. 10/01/2025: the Proponent completed internal audit of the website confirming compliance	C	The Lead Auditor has sighted the relevant documents and the Proponent - UWF website 'https://www.squadronenergy.com/our-projects/Uungula-wind-farm' The following plans, strategies, approvals of the plans and other documents are published on the website: i) EIS - On the website. ii) Final layout plans - v002 published on 07/11/2023. iii) Current Statutory approvals - Consent Mod 1, Mod 2 and EPBC approval are on the website. iv) Approved Strategies, plans or programs: TMP v003 (& approval dated 13.07.2022). EMS v004, approved on 27/06/2023, published 29/06/2023. BMP v005, approved 22/09/2023, published 25/09/2023. AES v0, approved 14/06/2023, published 16/06/2023. BBAMP V6a, Approved 22/02/2024, published 26/02/2024 v) The proposed staging plans for the development: Approved staging March 2022. vi) Monitoring results - None yet available. vii) Complaints Register - On the Website. viii) Minutes of CCC meetings - On the website. ix) Annual Statement of Compliant with EPL - None yet available. x) Independent Environmental Audit - to be updated once final audit report is received. • 10/01/2025: the Proponent completed an internal website audit completed showing compliance. xi) Other matters: 06/06/2023: Secretary requested the pre-construction Road Dilapidation survey be published online. The Lead Auditor sighted the records published on the website by the Proponent as per DPHI request. 7/11/2024: Secretary requested the OOHW approvals for Ilgingery d and TMR works be published online. The Lead Auditor sighted the records published on the website by the Proponent as per DPHI request. 10/01/2025: the Proponent completed internal audit of the website confirming compliance. The Lead Auditor sighted the records published on the website by the Proponent.
	a	(xi) any other matter required by the Planning Secretary; and			
	b	keep this information up to date.			

APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-6687-PA-31
Ms Sheree Kidziak
Environmental Advisor
Uungula Wind Farm Pty Ltd
Suite 1.01, 17 Moore Street
Canberra Australian Capital Territory 2601
16/12/2024

Subject: Uungula Wind Farm – Independent Environmental Audit #1 team endorsement request

Dear Ms Kidziak

Reference is made to your post approval matter, SSD-6687-PA-31, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the first Independent Environmental Audit of the Uungula Wind Farm, submitted as required by Part C, Condition C15 of SSD-6687 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 11 December 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent. In accordance with Part C Condition C15 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team from Healthy Buildings International Pty Ltd:

- Maulik Bapodara as Lead Auditor and
- Swathi Gowda as audit support

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

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely





HBI

Healthy Buildings International

Department of Planning, Housing and Infrastructure



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary



APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS



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Healthy Buildings International Pty Ltd

A.C.N. 80-172-680

A.S.N. 20 005 270 690

[illegible]

[illegible]

Audit Plan

Audit Site/Project: <u>Uungula Wind Farm</u> <u>Application Number:</u> SSD 6687 (as modified; the Approval) <u>Proponent:</u> Uungula Wind Farm Pty Ltd <u>Approval Authority:</u> A/Executive Director Energy, Industry and Compliance <u>Determination Date:</u> 7/5/2021 (Mod-1: 21/4/22, Mod-2: 2/12/22)	Company <u>Client:</u> Uungula Wind Farm Pty Ltd Auditee/s or Project Team: - Uungula Wind Farm Pty Ltd (the Proponent) - Nacap Pty Ltd	
Stage of works: This Audit Plan provides a summary of the proposed first Independent Audit scheduled to commence with a site inspection on 12 June 2025 and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm		
Key Auditee/s or Project Team Representatives and Contact Details: Uungula Wind Farm Pty Ltd: Vince Chaplin Senior Environmental Advisor 0 417 495 589 vince.chaplin@squadronenergy.com Sheree Kidziak Environmental Advisor 0403 473 127 sheree.kidziak@squadronenergy.com Cindy Smith Environmental Advisor cindy.smith@squadronenergy.com Malcolm Moore Site Representative Malcolm.moore@squadronenergy.com Malcolm McPhan Project Manager Malcolm.mcphan@squadronenergy.com Nacap Pty Ltd: TBC	Audit identification: Independent Audit No. 1 – Uungula Wind Farm Audit Dates and Indicative Program: Day 1 – 20 June 2025 (Day) - Indicative Audit Program - Refer Appendix A	
Proposed Audit Schedule		
Time	Audit Attendees	Scope (Conditions of Approval)
Opening Meeting: 09:00–09:15	All	NA
Site Inductions (as required) and Site Inspection 09:15 –11:00	Uungula Wind Farm Pty Ltd Nacap Pty Ltd including relevant Site Supervisor(s) for Site Inspection Areas	- Site Inspection (key sites, site compounds, laydown areas) - Uungula Wind Farm conditions of approval Parts A, B and C
Interviews / Verification of evidence: 11:00 –17:00 with Lunchbreak: 12:00 -12:30	Uungula Wind Farm Pty Ltd Nacap Pty Ltd (relevant personnel TBC further in Opening Meeting)	- Consultation Scope (DPH/DRC) - Part A (Administrative Conditions) - Part B (Community Information and Reporting) - Part C (Construction Environmental Management) - An assessment of incidents, non-compliances

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	and during course of the audit – such as Community Stakeholder and Engagement, Traffic, Spoil, Design, Plant and Property /Interface Management Teams)	and complaints that occurred or were made during the audit period
Lunchbreak: 12:00 -12:30		
Interviews / Verification of evidence: 12:30– 16:30	Uungula Wind Farm Pty Ltd Nacap Pty Ltd relevant personnel – such as Community Stakeholder and Engagement, Traffic, Spoil, Design, Plant and Property /Interface Management Teams	Part E (Key Issues Conditions)
Day 3: Initial Closing Meeting: 16:30- 17:00	All	- Informal closing meeting to provide preliminary summary of the audit findings. - A formal closing meeting will be held once all evidence has been reviewed - refer Appendix A.
Audit Team: Lead Auditor: Maulik Bapodara (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C - 462181) Support Auditor/Reviewer: Swathi Gowda (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C - 442234)		
Audit Objective: This Independent Audit has been prepared to satisfy Condition C15 of State Significant Development (SSD) 6687 of the Project planning approval and aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs).		
Audit Reference Documents: - Independent Audit Post Approval Requirements [DPIE (now DPH)], 2020] - ISO 14001: 2015 Environmental Management Systems - AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems - Evidence submitted for review during the audit		
Audit Period: The temporal period covered by the audit is from the date of commencement of construction (31 March 2025) to the date of the site inspection (20 June 2025).		
Audit Scope: The audit will comprise four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting. The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs: - an assessment of compliance with SSD 6687 (as modified), Parts A, B, and C, Appendices 1 to 9 - an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; - a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:		

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- actual impacts compared to predicted impacts documented in the environmental impact assessment;
- the physical extent of the development in comparison with the approved boundary;
- incidents, non-compliances and complaints that occurred or were made during the audit period;
- the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

During the consultation period, the Department provided the following feedback in relation to the audit scope:

- *"Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans."*
- *Review the environmental performance of the development including: actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.*
- *A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.*
- *Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.*
- *Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.*
- *Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met*
- *Details of the works that have been undertaken so far at the Project.*
- *Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.*
- *If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.*
- *Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginyer Road.*
- *Are accurate records are being kept, specifically in relation to community complaints and actions.*

In regards to consultation with other agencies, please consult with the following:

- Local Council – Dubbo Regional Council
- Environment Protection Authority
- Transport for NSW
- NSW DCCEEW CPHR
- Heritage NSW
- Water Group of DCCEEW
- NSW Rural Fire Service
- Community Consultative Committee"

Community consultative Committee (CCC) provided the following feedback in relation to the audit scope:

- *"The chairperson of the CCC confirmed that no feedback received from CCC members"*

Dubbo Regional Council provided the following feedback in relation to the audit scope:

- *"The sub-contractor to the Applicant, Wellington Sand and Soil, is utilising Wuuluman Road (unformed Road) creating serious dust pollution (B16) and damaging the road (B32) without maintaining it. Council has received complaints about the above that have also been reported to the Applicant who appears to not have taken any action.*
- *Council notes that road works are under construction in accordance with Condition (B30) and noting Appendix 7 –*



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Schedule of Road Upgrades, at the Goolma Road and Twelve Mile Road intersection:

- Design and construct a new intersection with a channelised right (CHR) turn lane and an Auxiliary Left (AUL) turn lane treatment; and
- Permanently remove and close the existing intersection.

- Condition A14 requires the Applicant to enter into a VPA in accordance with Appendix 3.

The applicant has entered into a Planning Agreement with Council which can be found on Council's [website](#). As such, Condition A14 has been satisfied.

A recent inspection of the site did not indicate that any turbines have been constructed. Should the audit find turbines have been constructed, the applicant would be required to pay the relevant amount to Council."

NSW EPA provided the following feedback in relation to the audit scope:

- "The EPA regulates Uungula Wind Farm under Environment Protection Licence No. 21862, issued to UWF Nominees Pty Ltd.
- The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations.
- As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. As such the EPA is not directly involved in the carrying out of audits to achieve those objectives and does not review or comment on such documents.
- As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at <https://apps.epa.nsw.gov.au/prpoeoapp/> to view the Licences associated notices."

Heritage NSW (DCCEEW) provided the following feedback in relation to the audit scope:

- "In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the following as key matters for consideration:
 - Condition B25 requires that the Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. In accordance with this condition Section 3.1 of the approved Heritage Management Plan (HMP, dated 19 July 2024) outlines specific measures to be implemented to ensure no harm, including demarcation as exclusion zones via fencing and/or signage and identification of exclusion zones on site plans. As per table 1 of the Conditions of consent this specifically includes avoidance and protection of the following Aboriginal sites:
 - UWF SU49/L1 (AHIMS 36-S-0184)
 - UWF SU32/L1 (AHIMS 36-S-0174)
 - UWF SU96/L6 (AHIMS 36-S-0329)
 - As per Condition B26(c), Section 3.4 of the approved HMP requires that all site personnel undergo site induction training in relation to Aboriginal heritage and historic heritage and that records of heritage inductions will be kept. Evidence of the records or these inductions should be sought to confirm that this requirement has been met.
 - Section 3.1 of the approved HMP requires that where Aboriginal artefact locales will be impacted, an Aboriginal Site Impact Recording Form (ASIRFs) will be completed and submitted to Heritage NSW within six (6) months from the commencement of the activity. Evidence should be sought to confirm that ASIRFs have been submitted for sites subject to approved harm within six (6) months of that harm. Note that harm also includes management activities such as salvage under an approved HMP.
 - In accordance with Condition B25, Section 3.2.1 of the approved HMP outlines that, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6 (of the Development Consent), the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location. Section 3.2.1 outlines the steps that must be followed including the post-salvage reporting and consultation requirements. Where any salvage has occurred under the HMP, evidence should be sought that the process complied with the procedure outlined in Section 3.2.1 of the HMP including evidence that the salvage report has been provided to the proponent, relevant agencies and RAPs.
 - Section 4.1 of the approved HMP commits to submitting ASIRFs to Heritage NSW (i.e. the Aboriginal heritage information management system; AHIMS) for all sites impacted during construction. Evidence should be sought to confirm that this has been undertaken, where applicable."

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NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) Conservation Programs, Heritage and Regulation Group (CPHR) provided the following feedback in relation to the audit scope:

- "NSW DCCEEW CPHR notes the brief for the first independent audit and have no further issues to be addressed."

NSW RFS verbally confirmed over a telephonic conversation that it has no further issues to be addressed.

Transport for NSW provided the following feedback in relation to the audit scope:

"TfNSW would like the following matters considered within the audit:

- Review of the current operation of the Goolma Road and Twelve Mile Road intersection and compliance with the agreed secretary approval dated 23 November 2023.
- A construction compound is being used at the intersection of Goolma Road and Twelve Mile Creek. TfNSW request information of how this was agreed to.
- Compliance with the requirements of the Traffic Management Plan
- Compliance with conditions of consent particularly Part B conditions B27 to B33."

Water Group of NSW DCCEEW provided the following feedback in relation to the audit scope:

- "The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include Water Management Plans and related sub-plans e.g., Site Water Balance, ERSO Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant
- Water Access Licence/s used to account for water take by the project nominates the work where water is being taken from
- Annual reporting clearly documents: 1) water take, use and water source impacts, 2) compare results with previous years, and 3) identifies exceedances and how these are managed/mitigated."

Evaluation of compliance will be carried out in accordance with Sec 3.7 of the IAPARs and documented in an Audit Table, which will include the conditions of SSD 6687. The compliance status of each compliance requirement in the Audit Table will be determined using the relevant descriptors in Sec 3.8, Table 2 of the IAPARs. As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the Project.

The Audit Table maybe updated to incorporate Project-specific requirements where necessary.

Documentation and Records: The following list provides a high-level indication of documentation and records that may be requested for review prior to and during the audit (but not limited to):

- Project approval documentation including any ancillary facilities, minor ancillary facilities, Consistency Assessments
- Construction Monitoring Reports
- Construction Environmental Management Plan and associated sub-plans
- Relevant supporting correspondence from the Department, other agencies and stakeholders
- Erosion and Sediment Control Plans
- Out of Hours Works Applications and Permits
- Specialist Reports including (but not limited to):
 - Soil and Groundwater technical reports, including waste classification reports (and disposal records)
 - Heritage Assessments and clearance reports
 - Noise and Vibration Assessments and monitoring data
 - Water quality assessments and monitoring data
 - Ecological / Flora and Fauna / Tree Protection (Arborist) Reports
- Evidence of close-out of previous Environmental Independent Audit actions
- Any other applicable approvals, permits or Project-specific environmental requirements

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- Evidence of submission of documents and records to agencies
- Inspection Reports and Monthly Reports
- Complaints Registers and complaint response records
- Incident and Non-Compliance Registers/Reports, evidence of action close-out

Applicable Site Safety Rules/Inductions required: To be advised by the Auditees

PPE Requirements: To be advised by the Auditees

Any Special Conditions or Requirements: To be advised by the Auditees

Prepared By:

Maulik Bapodara
Lead Auditor
Healthy Buildings International Pty Ltd
3 June 2025

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Appendix A – Independent Audit Indicative Audit Program

Indicative Audit Schedule	
<u>INDEPENDENT AUDIT - TASK/DETAILS</u>	<u>Uungula Wind Farm</u>
<u>STAKEHOLDER CONSULTATION</u>	-
DPHI scope consultation commencement	7/4/2025
Target DPHI consultation end date/DPHI scope consultation received	18/4/2025
Other stakeholder [NSW EPA/Councils (Dubbo Regional)] scope consultation on receipt of DPHI scope consultation	21/4/2025
Other stakeholder consultation period finishes	2/5/2025
<u>AUDIT PLANNING/PRELIMINARY DOCUMENT REVIEW (AVAILABLE INFORMATION)</u>	-
Pre-audit planning	2/5/2025 - 12/6/2025
<u>SITE VISIT/INTERVIEWS</u>	-
Opening Meeting, Site Inspection, Site Interviews and Verification of evidence	20/6/2025
Contingency day on-site for completion of Site Inspection, Interviews and Verification of evidence - to be determined further by Lead Auditor; and also dependent on scope consultation outcomes from DPHI and other stakeholders.	TBC
<u>POST SITE VISIT VERIFICATION</u>	-
Follow up period for verification of evidence (desktop) - It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor/Auditor	23/6/2025 - 9/7/2025
Closing Meeting - Final (TBC)	9/7/2025
<u>DRAFT REPORTING</u>	-
Draft Consolidated Audit Report including Audit Table	10/7/2025
<u>REVIEW PERIOD</u>	-
Auditee Review Period (Squadron Energy/Contractor): - Comments back within one week (One set of consolidated comments is requested from review of Draft Audit Report). - The Draft Audit Report may only be revised in instances where Auditors are satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place.	10/7/2025 - 17/7/2025
<u>FINAL REPORTING</u>	-
Final Consolidated Audit Report issued to Squadron Energy	18/7/2025

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APPENDIX D – CONSULTATION RECORDS

Thursday, May 29, 2025 at 12:07:49 PM Australian Eastern Standard Time

Subject: Re: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation
Date: Friday, 23 May 2025 at 09:39:40 Australian Eastern Standard Time
From: Garry West
To: Maulik Bapodara
Attachments: Image001.png, Image002.png, Image003.png

Maulik

I have not received any feedback from CCC members.

Garry

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Date: Friday, 23 May 2025 at 9:31 am
To: Garry West <garry.west@gbwconsulting.com.au>
Subject: Re: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

Good morning,

Writing to seek an update regarding your feedback for the first independent audit related to Ungula Wind Farm. Please can you respond to this email if there are any items that need to be looked at during the independent audit.

Please do not hesitate to contact me if you have any questions.

Thanks and regards,
Maulik

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

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Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

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Healthy Buildings International



From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Tuesday, April 15, 2025 12:32 PM
To: Garry West <garry.west@gbwconsulting.com.au>
Subject: Re: First Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

Hello Garry,

Thank you for your response. Please can you circulate the email to all the CCC members for me as I do not have their email address.

Thanks and regards,

Maulik

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

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From: Garry West <garrywest@gtwconsulting.com.au>
Date: Tuesday, 15 April 2025 at 12:22
To: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Subject: Re: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

Maulik

Has this email gone to all CCC members or do you wish me to circulate it to them?

Garry

Garry West
0418 215 059

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Date: Tuesday 15 April 2025 at 10:46 am
To: "garrybwest@bigpond.com" <garrybwest@bigpond.com>
Subject: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

Good morning

RE: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

3 of 6



As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with Community Consultative Committee on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](https://planningportal.nsw.gov.au/Uungula-Wind-Farm-SSD-6687-Development-Consent)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://nsw.gov.au/independent-audit-post-approval-requirements)

The audit is scheduled to commence with a site inspection on **12 June 2025** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period

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the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit

feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period

the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)

a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate

any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI and the following has been requested:

Ensure you assess compliance with all conditions of consent applicable to the phase of the

development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.

Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.

A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.

Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.

Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.

Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met

Details of the works that have been undertaken so far at the Project.

Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the

5 of 6





relevant management plans.

If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.

Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginery Road.

Are accurate records are being kept, specifically in relation to community complaints and actions.

In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards,

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

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Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au



7 April 2025

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary
compliance@planning.nsw.gov.au

Ref: 241116 SQUADRON ENERGY UWF

Dear Sir / Madam

RE: First Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

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 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period

Leaders in Environmental Consulting

1





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- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **18 April 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Also please find attached auditor agreement from DPHI.

Kind regards,

Maulik Bapodara
Independent Lead Environmental Auditor

Encl. Auditor agreement from DPHI

cc. Sheree Kidziak (sheree.kidziak@squadronenergy.com)

Leaders in Environmental Consulting

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Monday, April 14, 2025 at 8:32:00 AM Australian Eastern Standard Time

Subject: Independent Environmental Audit (IEA) - Ungula Wind Farm SSD-6687 - DPHI Consultation
Date: Thursday, 10 April 2025 at 13:51:33 Australian Eastern Standard Time
From: Jennifer Rowe
To: Maulik Bapodara
CC: Jo Robertson, Katrina O'Reilly
Attachments: image001.png, image002.png, image003.png, image004.png, DPHI_Consultation_UWF_7425_Combined.pdf

To Maulik

I have reviewed your email to NSW Planning, requesting consultation on the upcoming Independent Environmental Audit (IEA) for the Ungula Wind Farm Project, SSD-6687.

The Audit needs to ensure that it addresses all conditions of consent for the Ungula Wind Farm Project, SSD-6687 (Consent) and is prepared to meet the requirements of Condition C15 and the *Independent Audit Post Approval Requirements (DPIE, 2020)*.

<https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf>

As part of your Audit can you please address/review the following aspects:

- Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.
- Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.
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- Details of the works that have been undertaken so far at the Project.
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.
- Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginery Road.
- Are accurate records are being kept, specifically in relation to community complaints and actions.

In regards to consultation with other agencies, please consult with the following:

1 of 3





- a. Local Council – Dubbo Regional Council
- b. Environment Protection Authority
- c. Transport for NSW
- d. NSW DCCEEW CPHR
- e. Heritage NSW
- f. Water Group of DCCEEW
- g. NSW Rural Fire Service
- h. Community Consultative Committee

Please ensure you append this email to the Audit Report.

The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.

Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to *provide the auditor with reasonable access to all requested development areas and activities*, thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

Should you have any further questions, please don't hesitate to contact me on the details below.

Kind regards,

Jennifer Rowe
Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure
T 02 4247 1851 | M 0488 988 641 | E jennifer.rowe@planning.nsw.gov.au
PO Box 5475 | Level 2/84 Crown Street Wollongong, NSW 2500
(Work Days: Tuesday, Wednesday & Thursday)
www.dphi.nsw.gov.au



The Department of Planning, Housing & Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Please note that I work flexibly. I'm sending this message now because it's a good time for me, but I don't expect that you will read, respond to or action it outside of your own regular hours.



Please consider the environment before printing this e-mail

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Monday, 7 April 2025 4:26 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

2 of 3



Cc: Jo Robertson <jrh@hbi.com.au>; Sheree Kidziak <sheree.kidziak@squadronenergy.com>
Subject: First Independent Audit - SSD 6687 - Uungula Wind Farm - DPHI Consultation

Dear Katrina

RE: First Independent Audit – SSD 6687 – Uungula Wind Farm Consultation

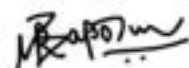
As the independent auditor engaged by Uungula Wind Farm Pty Ltd (SSD-6687 -as modified; Approval), I am consulting with DPHI on the scope of the first Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

Please refer to the details in the attached letter. Also included for information within the letter, is the DPHI Auditor Appointment with respect to the SSD 6687 Independent Audit.

We look forward to hearing from you before 18 April 2025 (or earlier, if possible) to enable meeting the audit schedule and requirements.

Yours sincerely

Maulik Bapodara



Maulik Bapodara

Lead Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

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Healthy Buildings International

SSD2020-2 Part 1
AD25/40189
Parcel 48176

6 May 2025



Healthy Buildings International Pty Ltd
Suite 2.06
Level 2
29-31 Solent Circuit
NORWEST NSW 2153

Dear Maulik

SSD 6687 - UUNGULA WIND FARM

I refer to your email dated 15 April 2025, seeking input into an independent audit of the Uungula Wind Farm project.

The subject site is located in a rural area having no services (water supply, sewerage or stormwater). Access to the subject site is from Twelve Mile Road, Wuuluman Road, Uungula Road and Ilginery Road which are a mix of sealed and unsealed gravel roads, with grassed table drains, all maintained by Council.

Comments received from various Council officers include the following:

- The sub-contractor to the Applicant, Wellington Sand and Soil, is utilising Wuuluman Road (unformed Road) creating serious dust pollution (**B16**) and damaging the road (**B32**) without maintaining it. Council has received complaints about the above that have also been reported to the Applicant who appears to not have taken any action.
- Council notes that road works are under construction in accordance with Condition (**B30**) and noting Appendix 7 – Schedule of Road Upgrades, at the Goolma Road and Twelve Mile Road intersection:
 - Design and construct a new intersection with a channelised right (CHR) turn lane and an Auxiliary Left (AUL) turn lane treatment; and
 - Permanently remove and close the existing intersection.
- Condition **A14** requires the Applicant to enter into a VPA in accordance with Appendix 3.

The applicant has entered into a Planning Agreement with Council which can be found on Council's [website](#). As such, Condition **A14** has been satisfied.

All communications to: Chief Executive Officer
Dubbo Regional Council
PO Box 81
Dubbo NSW 2830
T (02) 9800 4000 E council@dubbo.nsw.gov.au
ABN 63 559 070 906

W dubbo.nsw.gov.au





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Healthy Buildings International

Page 2

A recent inspection of the site did not indicate that any turbines have been constructed. Should the audit find turbines have been constructed, the applicant would be required to pay the relevant amount to Council.

I trust these comments will assist the audit, please do not hesitate to contact Council's Manager Building and Development Services, Darryll Quigley, during normal office hours, on 6801 4656 for any enquiries.

Yours faithfully

Darryll Quigley
Manager Building & Development Services



Sunday, July 6, 2025 at 11:29:36 AM Australian Eastern Standard Time

Subject: First Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation
Date: Tuesday, 15 April 2025 at 11:17:31 Australian Eastern Standard Time
From: Maulik Bapodara
To: council@dubbo.nsw.gov.au
Attachments: image001.png

Good morning

RE: First Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with Dubbo Regional Council on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) - Development Consent - \(planningportal.nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **12 June 2025** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

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1 of 3



- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
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We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

2 of 3





Healthy Buildings International

Kind regards,

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

[Healthy Buildings International Pty Ltd](#)

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

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3 of 3





DOC25/315129-1

Maulik Bapodara
Independent Lead Environmental Auditor
Healthy Buildings International Pty Ltd
ABN: 39 003 270 693
Suite 2.06, Level 2, 29-31 Solent Circuit,
Norwest NSW 2153

28 April 2025

Dear Maulik,

UUNGULA WIND FARM INDEPENDENT ENVIRONMENTAL AUDIT

I refer to your email, dated 15 April 2025, to the Environment Protection Authority (EPA) requesting consultation as part of an Independent Environmental Audit for Uungula Wind Farm in accordance with SSD-6687.

The EPA regulates Uungula Wind Farm under Environment Protection Licence No. 21862, issued to UWF Nominees Pty Ltd.

The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential or actual risks towards achieving these obligations.

As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. As such the EPA is not directly involved in the carrying out of audits to achieve those objectives and does not review or comment on such documents.

As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at <https://apps.epa.nsw.gov.au/prpocapp/> to view the Licences associated notices.

If you have any questions about this matter, please contact Elliott Carlin on 0439 382 405 or by email to info@epa.nsw.gov.au and marked to the attention of Elliott Carlin.

Yours sincerely,



Joshua LOXLEY
Unit Head – Regulatory Operations
Environment Protection Authority

Phone 131 555
Phone +61 2 9995 5555
(from outside NSW)

TTY 133 677
ABN 43 692 285 758

PO Box 2111
Dubbo
NSW 2830 Australia

L1, 48-52 Wingewarra St
Dubbo
NSW 2830 Australia

info@epa.nsw.gov.au
www.epa.nsw.gov.au



Sunday, July 6, 2025 at 11:32:28 AM Australian Eastern Standard Time

Subject: First Independent Audit - SSD 6687 - Ungula Wind Farm - Consultation
Date: Tuesday, 15 April 2025 at 11:27:03 Australian Eastern Standard Time
From: Maulik Bapodara
To: centralwest@epa.nsw.gov.au, info@epa.nsw.gov.au
Attachments: image001.png

Good morning

RE: First Independent Audit - SSD 6687 - Ungula Wind Farm - Consultation

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1 of 3



stakeholders on the environmental performance of the project during the audit period

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Healthy Buildings International

Kind regards,

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

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3 of 3



Maulik Bapodara
Independent Lead Environmental Auditor
Healthy Buildings International Pty Ltd
maulik.bapodara@hbi.com.au

Letter provided via return email

Independent Environmental Audit – State Significant Development

Proposal: Ungula Wind Farm

Major Project reference: SSD-6687

Received: 2 May 2025

Dear Maulik,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above Development. Thank you for the continued opportunity to comment on the project.

It is understood that Healthy Buildings International Pty Ltd (HBI) has been engaged by Ungula Wind Farm Pty Ltd to conduct the first independent environmental audit (IEA) for the Ungula Wind Farm project (SSD 6687 - as modified; Approval). In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the following as key matters for consideration.

- Condition B25 requires that the Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint. In accordance with this Condition Section 3.1 of the approved Heritage Management Plan (HMP; dated 19 July 2024) outlines specific measures to be implemented to ensure no harm, including demarcation as exclusion zones via fencing and/or signage and identification of exclusion zones on site plans. As per Table 1 of the Conditions of Consent this specifically includes avoidance and protection of the following Aboriginal sites:
 - UWF SU49/L1 (AHIMS 36-5-0184)
 - UWF SU32/L1 (AHIMS 36-5-0174)
 - UWF SU96/L6 (AHIMS 36-5-0329)



- As per Condition B26(c), Section 3.4 of the approved HMP requires that all site personnel undergo site induction training in relation to Aboriginal heritage and historic heritage and that records of heritage inductions will be kept. Evidence of the records or these inductions should be sought to confirm that this requirement has been met.
- Section 3.1 of the approved HMP requires that where Aboriginal artefact locales will be impacted, an Aboriginal Site Impact Recording Form (ASIRFs) will be completed and submitted to Heritage NSW within six (6) months from the commencement of the activity. Evidence should be sought to confirm that ASIRFs have been submitted for sites subject to approved harm within six (6) months of that harm. Note that harm also includes management activities such as salvage under an approved HMP.
- In accordance with Condition B25, Section 3.2.1 of the approved HMP outlines that, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6 (of the Development Consent), the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location. Section 3.2.1 outlines the steps that must be followed including the post-salvage reporting and consultation requirements. Where any salvage has occurred under the HMP, evidence should be sought that the process complied with the procedure outlined in Section 3.2.1 of the HMP including evidence that the salvage report has been provided to the proponent, relevant agencies and RAPs.
- Section 4.1 of the approved HMP commits to submitting ASIRFs to Heritage NSW (i.e. the Aboriginal heritage Information management system; AHIMS) for all sites impacted during construction. Evidence should be sought to confirm that this has been undertaken, where applicable.

It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Marika Low, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
A/Strategic Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
13 May 2025



Sunday, July 6, 2025 at 11:35:29 AM Australian Eastern Standard Time

Subject: First Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation
Date: Tuesday, 15 April 2025 at 11:54:33 Australian Eastern Standard Time
From: Maulik Bapodara
To: heritagemailbox@environment.nsw.gov.au
Attachments: image001.png

Good morning

RE: First Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with Heritage NSW on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) - Development Consent - \(planningportal.nsw.gov.au\)](https://www.planningportal.nsw.gov.au/major-projects/projects/uungula-wind-farm)

<https://www.planningportal.nsw.gov.au/major-projects/projects/uungula-wind-farm>

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://www.planningportal.nsw.gov.au/major-projects/projects/uungula-wind-farm)

The audit is scheduled to commence with a site inspection on **12 June 2025** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and

1 of 3



- stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI and the following has been requested:

- Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.
- Review the environmental performance of the development including: actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.
- A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.
- Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.
- Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met
- Details of the works that have been undertaken so far at the Project.
- Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.
- If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.
- Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilgingery Road.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au





HBI

Healthy Buildings International

Kind regards,

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

[Healthy Buildings International Pty Ltd](#)

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

3 of 3





Thursday, May 29, 2025 at 12:21:27 PM Australian Eastern Standard Time

Subject: RE: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation [ref:100D7F06Tix.1500Mn0oq6RB:ref]
Date: Wednesday, 16 April 2025 at 14:02:47 Australian Eastern Standard Time
From: David Geering
To: Maulik Bapodara
Attachments: image001.png, image002.png

Hi Maulik

I am the lead officer for the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) in regards the Ungula Wind Farm. I will be your primary contact in regards biodiversity and flooding issues. I note your brief for the first independent audit and have no further issues that we wish to be addressed.

Regards

David

David Geering
Senior Conservation Planning Officer
North West Conservation Programs, Heritage & Regulation Group
Department of Climate Change, Energy, the Environment and Water

www.dcccew.nsw.gov.au

48-52 Wingewarra Street, Dubbo 2830
PO Box 2111 Dubbo NSW 2830
T: 02-6883-5335 | E david.geering@environment.nsw.gov.au
48-52 Wingewarra Street, Dubbo NSW 2830



From: Maulik Bapodara [maulik.bapodara@hbi.com.au]
Sent: 15/04/2025 11:56
To: info@environment.nsw.gov.au
Subject: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

Good morning

RE: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

As the independent auditor, engaged by Ungula Wind Farm Pty Ltd, for the Ungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with NSW

1 of 4



DCCEEW CPHR on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](https://planningportal.nsw.gov.au/Uungula-Wind-Farm-SSD-6687-Development-Consent)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://nsw.gov.au/Independent-Audit-Post-Approval-Requirements)

The audit is scheduled to commence with a site inspection on **12 June 2025** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

1. an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
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3. a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
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 2. the physical extent of the development in comparison with the approved boundary
 3. incidents, non-compliances and complaints that occurred or were made during the audit period
 4. the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 5. feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
1. the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
2. a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
3. any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI and the following has been requested:

4. Ensure you assess compliance with all conditions of consent applicable to the phase of the

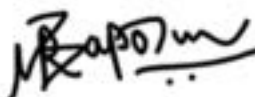


development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.

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6. A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.
7. Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.
8. Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.
9. Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met
10. Details of the works that have been undertaken so far at the Project.
11. Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.
12. If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.
13. Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginery Road.
14. Are accurate records are being kept, specifically in relation to community complaints and actions.
15. In providing input to the scope, we kindly request that you confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards,



Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153





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ref:!00D7F06iTix.!500Mn0oq6RB:ref

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Thursday, May 29, 2025 at 12:22:30 PM Australian Eastern Standard Time

Subject: Re: First Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation
Date: Monday, 28 April 2025 at 14:12:07 Australian Eastern Standard Time
From: Maulik Bapodara
To: Dave.Millstead@rfs.nsw.gov.au
CC: Jo Robertson, Sheree Kidziak, Swathi Gowda
Attachments: image001.png

Good afternoon

RE: First Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with NSW RFS on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **12 June 2025** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

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1 of 3



- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
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- Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginery Road.
- Are accurate records are being kept, specifically in relation to community complaints and actions.

In providing input to the scope, we kindly request that NSW RFS confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **16 May 2025** (or earlier, if possible) to

2 of 3





Healthy Buildings International

enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards,

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

3 of 3



Thursday, May 29, 2025 at 12:24:10 PM Australian Eastern Standard Time

Subject: RE: First Independent Audit - SSD 6687 - Ungula Wind Farm - Consultation
Date: Monday, 5 May 2025 at 16:09:17 Australian Eastern Standard Time
From: Tim Mitchell
To: Maulik Bapodara
Attachments: image001.png, image002.png, image003.png, image004.png

Hi Maulik,

Thanks for contacting TfNSW regarding the independent audit for Ungula Wind Farm. Sorry about the delay in response.

TfNSW would like the following matters considered within the audit:

- Review of the current operation of the Goolma Road and Twelve Mile Road intersection and compliance with the agreed secretary approval dated 23 November 2023.
- A construction compound is being used at the intersection of Goolma Road and Twelve Mile Creek. TfNSW request information of how this was agreed to.
- Compliance with the requirements of the Traffic Management Plan
- Compliance with conditions of consent particularly Part B conditions B27 to B33.

Kind Regards,

Tim Mitchell

Development Services Case Officer - Renewables
Transport Planning
Planning, Integration and Passenger
Transport for NSW

P 1300 019 680 E development.renewables@transport.nsw.gov.au

transport.nsw.gov.au



Transport
for NSW



OFFICIAL

I acknowledge the Aboriginal people of the country on which I work, their traditions, culture and a shared history and identity. I also pay my respects to Elders past and present and recognise the continued connection to country.

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1 of 3



OFFICIAL

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Tuesday, 15 April 2025 2:11 PM
To: Development West <development.west@transport.nsw.gov.au>
Subject: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

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Good afternoon

RE: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

As the independent auditor, engaged by Ungula Wind Farm Pty Ltd, for the Ungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with TINSW on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

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The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(\[nsw.gov.au\]\(http://nsw.gov.au\)\)](#)

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2 of 3





Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.

A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.

Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.

Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.

Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met

Details of the works that have been undertaken so far at the Project.

Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.

If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.

Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginyer Road.

Are accurate records are being kept, specifically in relation to community complaints and actions.

In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards,

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

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NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT25/4577

Maulik Bapodara
Healthy Buildings International PTY Ltd
Email: maulik.bapodara@hbi.com.au

17/04/2025

Subject: Uungula Wind Farm - Independent Environmental Audit - SSD- 6687

Dear Maulik,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
<https://www.nsw.gov.au/departments-and-agencies/dcceew>



NSW Department of Climate Change, Energy, the Environment and Water

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEE - Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,



Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
<https://www.nsw.gov.au/departments-and-agencies/dccee/>



Sunday, July 6, 2025 at 11:51:59 AM Australian Eastern Standard Time

Subject: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation
Date: Tuesday, 15 April 2025 at 12:30:39 Australian Eastern Standard Time
From: Maulik Bapodara
To: ewater@dcceew.gov.au
Attachments: image001.png

Good afternoon

RE: First Independent Audit - SSD 6687 – Ungula Wind Farm - Consultation

As the independent auditor, engaged by Ungula Wind Farm Pty Ltd, for the Ungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with Water Group of DCCEEW on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

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The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

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 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit

1 of 3



- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI and the following has been requested:

- Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.
- Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.
- A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.
- Ensuring all environmental controls have been installed and are adequate, specifically in relation to managing water, noise and dust.
- Biodiversity impacts on site addressed appropriately, particularly prior to commencing constructions activities eg clearance protocols met
- Details of the works that have been undertaken so far at the Project.
- Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.
- If there are any required development exclusion zones, have they been installed prior to works commencing and are they adequate.
- Compliance with Out of Hours Works approvals, particularly around the road upgrade works associated with Twelve Mile Road and Ilginery Road.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **2 May 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au





Healthy Buildings International

Kind regards,

Maulik Bapodara

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

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APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

SITE INSPECTION NOTES AND PHOTOS	
	Site entrance located at 1360 Twelve Mile Road, Wuuluman was observed to be a stabilised hardstand with appropriate project related signage. A water cart was in attendance for dust suppression. No dirt was observed. Water cart was deployed for dust suppression around the access tracks.
	Rain water tanks and generators in use at the site sheds, offices and amenities.
	Sediment Basin (SB1-2) operating. Minimal amount of water was observed from last month's rain.





Plant was observed working in the civil works area and laydown area.



Plant working on the access tracks, looking east.





Erosion and sediment controls were observed to be in place around access tracks and swales in accordance with the approved erosion and sediment control plans.



Topsoil stockpiles were observed located within the approved project boundary and appropriate sediment controls were in place around the stockpiles.





Workshop and site laydown area establishment in progress. Two (2) 70,000L fuel tanks, self-bunded were delivered (relocated). Appropriate spill containment equipment and firefighting equipment was also sighted to be in place in the laydown area.



Concrete, rock and reusable spoil storage area was observed within the laydown area.





Boundary fencing was observed to be in place with erosion and sediment controls including rock checks and sediment fences.



Boundary fencing and no-go zone or exclusion zones in place around cultural heritage sensitive areas and around vegetation to be retained.





Weed hygiene clean down point was observed to be in place on access tracks with appropriate signage and instructions for inspection and cleaning of vehicles prior to entering the next property.



Access track towards pad nine (9), facing north. Civil works were ongoing.





Pad nine (9), civil works ongoing. Dust suppression was observed to be undertaken using water carts at the time of inspection. No visible dust from ongoing earthworks at the time of the inspection.



Mulch berms were observed to be installed around the work areas. Sediment controls were observed to be in place.





Earthworks in progress related to wind turbine tower 15.



Facing west, photograph showing embankment being covered with topsoil and rock protection in place downslopes for sediment control. All works were contained within the approved project boundaries as per visual observations.





Clean water diversions and rock check dams in place in accordance with approved erosion and sediment control plans endorsed by the CPESC.



Sediment basin was observed to be operational for dirty water collection and treatment near the site compound.





Evidence of polymer or soil binder application and rock placement for erosion and sediment control was observed.



Evidence of polymer or soil binder application and rock placement for erosion and sediment control was observed.



APPENDIX F – AUDIT REPORT DECLARATIONS

Independent Audit Report Declaration Form – MAULIK BAPODARA

Project Name	Uungula Wind Farm
Consent Number	SSD 6687
Description of Project	Development of a wind farm with up to 97 wind turbines, with energy storage facility (ESF) and associated infrastructure. The proposal is to construct, operate, and ultimately decommission and a rehabilitate a commercial scale wind farm indicatively producing 400 MW of clean energy to power the equivalent of 170,000 average NSW households each year. The inclusion of an ESF will allow for the Project to store and dispatch scheduled and reliable energy to and from the Project or the National Electricity Market (NEM).
Project Address	Uungula Wind Farm, 14 km east of Wellington NSW
Proponent	Uungula Wind Farm Pty Ltd
Date	8 July 2025

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019)
- ii. the findings of the audit are reported truthfully, accurately and completely
- iii. I have exercised due diligence and professional judgement in conducting the audit
- iv. I have acted professionally, objectively and in an unbiased manner
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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





HBI

Healthy Buildings International

Name of Auditor MAULIK BAPODARA

Signature

Qualification

Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-462181.

Company

Healthy Buildings International Pty Ltd.



Appendix E Notification to the Department of EPBC Annual Report 2024

RE: Ungula Wind Farm EPBC 2013/7026 - Annual Compliance Report (Condition 9) 2024
[SEC=OFFICIAL]

From epbcmonitoring <epbcmonitoring@dcceew.gov.au>
Date Fri 18/10/2024 4:05 PM
To Sheree Kidziak <sheree.kidziak@squadronenergy.com>
Cc Candice Somerville <Candice.Somerville@squadronenergy.com>

[CAUTION] This email originated outside SQE's network. If you do not recognise the sender or did not expect this email then please do not open any attachments or click any link.

Good afternoon Sheree,

Thankyou for sending through the 2023-24 Annual Compliance Report for EPBC 2013/7026.

The Department acknowledges receipt.

The department will be in contact with you if any further information is required after all the supplied documentation has been reviewed.

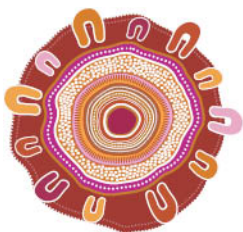
Warmest Regards,

Chloe Houston

Compliance Officer

Approvals Compliance Section | Department of Climate Change, Energy, the Environment and Water

P: 0461 259 958 | **E:** Chloe.houston1@DCCEEW.gov.au



We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.

From: Sheree Kidziak <sheree.kidziak@squadronenergy.com>
Sent: Friday, October 18, 2024 3:44 PM
To: epbcmonitoring <epbcmonitoring@dcceew.gov.au>
Cc: Candice Somerville <Candice.Somerville@squadronenergy.com>
Subject: Ungula Wind Farm EPBC 2013/7026 - Annual Compliance Report (Condition 9) 2024

Good morning EPBC Monitoring,

In accordance with Condition 9 of EPBC Approval 2013/7026, this email is to notify the Department that the annual Compliance Report (reporting period 3/08/2024 – 2/08/2024) was published on the project website today (18/10/2024) at the following address: <https://www.squadronenergy.com/our-projects/ungula-wind-farm>

A copy of the Annual Compliance Report is also attached to this email.

In accordance with condition 9, the compliance report has been published within three months of the 12-month anniversary of the date of the Approval.

If you have any questions, please don't hesitate to contact me.

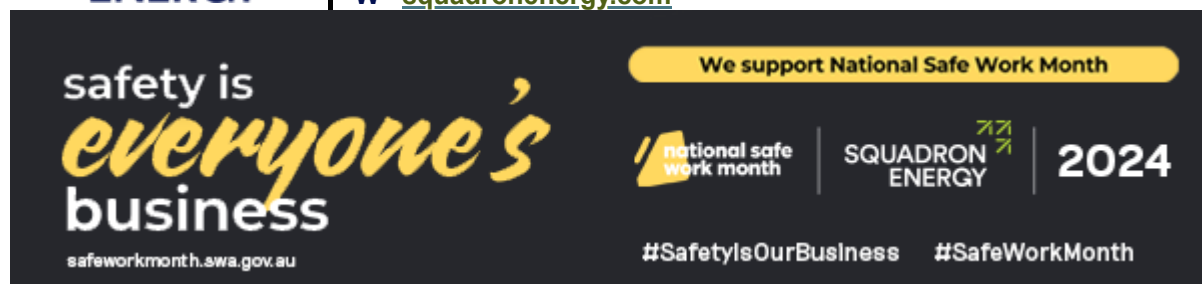
Kind Regards,

Sheree Kidziak

Environmental Advisor
People and Sustainability

 **SQUADRON ENERGY**

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L Canberra (GMT+10) Ngunnawal Country
W squadronenergy.com



Squadron Energy acknowledges the Traditional Owners and ongoing Custodians of the lands and waters on which we operate. We pay our respects to Elders past, present and emerging.

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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.



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