

29th July 2025



**Re: Ungula Wind Farm SSD-6687 – Cl. C15 – Independent Environmental Audit (IA1) –
Report and Response to IA1**

Attached please find a copy of the first Independent Environmental Audit of the project against the Conditions of Approval of SSD-6687 Ungula Wind Farm.

The Auditor found:

- 0 Non compliances (within the audit period)
- 4 Opportunities for improvement

As such, the Auditor has commended the project saying it has a high level of compliance.

Also, at Appendix A to this letter, please find Squadron Energy's Response to the Independent Environmental Audit, for your consideration.

If you require additional information or to further discuss this request, please contact Malcolm McPhan on 0447 800 089 or malcolm.mcphan@squadronenergy.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M McPhan', enclosed within a blue oval shape.

Malcolm McPhan
Project Manager
For and behalf of Squadron Energy

Proponent Response to Audit Findings:						
Item	Finding ID : Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action / Action taken / Response (as applicable)	Proposed Action Due Date
1	NC-1: 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)	<p>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).</p> <p>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.</p>	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.	<p>The following was sighted by the Lead Auditor:</p> <p>The construction contractor completed internal training on 26/03/2025 related to noise monitoring.</p> <p>An audit has been undertaken by the Proponent against the construction contractor and implementation of noise management measures.</p> <p>CEMP has been updated by the construction contractor to address the non-compliance as corrective action.</p>	Nil - Closed
2	OFI-1:S3.2	CEMP – Section 3.2 and Appendix C – Legal and Other Requirement register	<p>It was noted that the CEMP (Reference: UWF-NACAP-EHS-PLN-0006) dated 30 May 2025 was recently updated to revision 2.</p> <p>CEMP – Section 3.2 and Appendix C – The Legal and Other Requirements</p>	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. Register was found to be outdated, failing to reflect the most recent legislative amendments and updates to other	NACAP to update CEMP Legal and Other Requirements to reflect recent legislative amendments	1 st Nov 2025

Proponent Response to Audit Findings:						
Item	Finding ID : Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action / Action taken / Response (as applicable)	Proposed Action Due Date
				guidelines such as minor amendments to EP&A Act 1979 in 2025 and Water Management (General) Amendment (Exemptions for Infrastructure) Regulation 2025.		
3	OFI-2	EMS – Section 5.3 - Complaints	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.	Noted. Squadron Energy has written to Dubbo Regional Council and requested that any complaint be put in writing and emailed to: uungulawind@squadronenergy.com	Closed 30/7/2025
4	OFI-3	Heritage Management Plan v005 – Submission of the Final Salvage Report to the relevant agencies and the RAPs within the required timeframe.	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.	This was sent through to RAP's, AHIMS and Heritage NSW on 24 January 2025.	Closed 30/7/2025

Proponent Response to Audit Findings:						
Item	Finding ID : Condition Number	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action / Action taken / Response (as applicable)	Proposed Action Due Date
5	OFI-4	Heritage Management Plan v005 – Provision of ASIRFs to Heritage NSW	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.	All ASIRF's have been submitted to AHIMS/Heritage NSW and approved.	Closed 30/7/2025