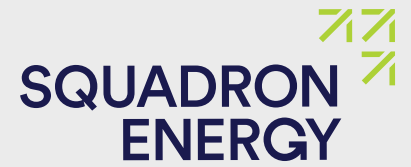


UUNGULA WIND FARM



ENVIRONMENTAL MANAGEMENT STRATEGY

19/06/23



Revision Control

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Key Terms

Table 1 Key Terms

Term	Definition
Ancillary infrastructure	Infrastructure necessary for the operation of the development: <ul style="list-style-type: none"> • Battery storage; • Collector substations; • Switching stations; • Permanent offices; • Electricity transmission lines; • Site compounds; • Underground and overhead electricity transmission lines; • Communication cables (including control cables and earthing); • Wind monitoring masts; and • Internal roads.
Applicant	See: Proponent.
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	NSW Biodiversity Conservation Act 2016
BCS	NSW Biodiversity, Conservation and Science Directorate
BMP	Biodiversity Management Plan
CCC	Community Consultative Committee
CEEC	Critically endangered ecological community, as defined under the BC Act or EPBC Act
CEMP	Construction Environmental Management Plan
CFP	Chance Finds Protocol
Council	Dubbo Regional Council
CWPR	CWP Renewables Pty Ltd
DCCEEW	Department of Climate Change, Energy, the Environment and Water
Development Application	Refer to the definition of EIS (below), the Development Application was formed by those component parts
Development Consent	SSD-6687
Development Footprint	The area of physical disturbance associated with the construction of the Project, comprised of temporary impacts and permanent impacts.
DoEE	Commonwealth Department of the Environment and Energy (now DCCEEW)
DPE	NSW Department of Planning and Environment
EIS	The environment impact statement for Ungula Wind Farm dated May 2020, the Submissions Report dated November 2020, the Amendment Report dated November 2020 and the additional information provided by the Applicant to the Department dated 22 January 2021, 15 March 2021, 23 April 2021 and 6 May 2021.
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999

Term	Definition
EPC	Engineering Procurement and Construction contractor; also refers to any other principal contracting entity engaged on the Project, such as TransGrid
EPL	Environment Protection Licence
ERP	Emergency Response Plan
HMP	Heritage Management Plan
LGA	Local Government Area
OEH	Office of Environment and Heritage (now BCS)
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
Project Site	The land within the cadastral boundaries associated with the proposed Project, as defined in Appendix 1 and 2 of the Development Consent.
Proponent	Uungula Wind Farm Pty Ltd
RMP	Risk Management Plan
RMS	Roads and Maritime Services (now Transport for NSW)
TEC	Threatened Ecological Community
The Minister	Minister for Agriculture, Water and the Environment and Energy (Commonwealth)
The Project	Bango Wind Farm
The Secretary	Secretary of Department of Planning and Environment (NSW)
TMP	Traffic Management Plan
UWF	Uungula Wind Farm Pty Ltd
WTG	Wind Turbine Generator

1 Introduction

1.1 Project overview

The Proponent, Ungula Wind Farm Pty Ltd, has obtained Development Consent for the construction, operation, maintenance, and decommissioning of the Ungula Wind Farm (the Project). The Project comprises up to 93 wind turbine generators (WTGs) and associated infrastructure including, access roads, hardstands, laydown areas, internal electrical reticulation, temporary construction compounds, rock crushing facilities, concrete batching plant(s), a substation, an operations and maintenance facility, overhead transmission line and a switching station.

The Project is located within the Dubbo Regional Local Government Area (LGA), approximately 14 kilometres east of Wellington, NSW.

Refer to Figure 1 for the approved Project layout. This layout will be further reduced throughout detailed design and a Final Layout Plan will be prepared and submitted to the Department of Planning and Environment (DPE) in accordance with development consent condition C8.

A full description of UWF is provided in the Environmental Impact Statement (EIS) which can be accessed on the UWF website at <https://www.squadronenergy.com/our-projects/uungula-wind-farm>

1.2 Project Staging

The Project will be developed in two stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'.
- Stage 2: Battery Storage Facility.

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 (refer to Planning Secretary approval at Appendix C).

All other Strategies, Plans and Programs will be prepared and submitted for Stage 1, and then updated for Stage 2 where required.

1.3 Purpose and objective of this EMS

This Environmental Management Strategy (EMS) has been prepared to meet the State and Commonwealth environmental approval requirements for environmental management.

This EMS is an overarching plan for the UWF which sets out the environmental management strategies for all facets of the Development including design, construction, operation, and decommissioning. It describes the environmental management systems and measures intended to protect, minimise, and manage environmental impacts during design, construction, operation and decommissioning.

In addition to the EMS, several other specific environmental subplans are required by SSD-6687. These are listed in Section 2.3 of this EMS. The scope of these subplans is to provide detailed stage-specific procedures for managing the relevant environmental issues in each subplan. The mitigation measures, monitoring methods and reporting procedures are detailed in these subplans and are periodically reviewed as the development progresses. These subplans are approved by the NSW Planning Secretary.

This EMS has been prepared to meet the requirements of condition C1 of SSD-6687. Table 2 provides a reference to the requirements of condition C1 and a reference to the section of the EMS where it has been addressed.

Following approval from the NSW Planning Secretary, this EMS will be implemented in accordance with Condition C1 and will be published on the project website in accordance with Condition C16 of SSD-6687.

1.4 Application of this EMS

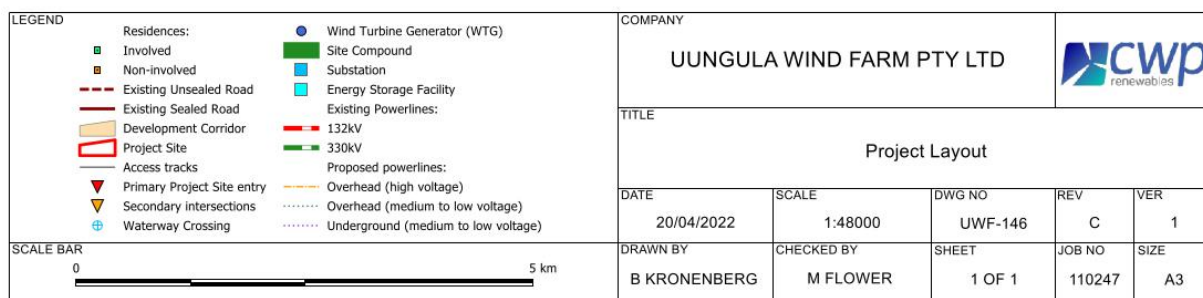
As noted in Section 1.3, this EMS applies to Stage 1 of the Development (Wind Farm and associated infrastructure, excluding the Battery Storage Facility).

This EMS and the associated environmental subplans apply to, and must be followed by, all employees, contractors and visitors during the construction, operation and decommissioning of the Project.

The EMS will form the basis of the Construction Environmental Management Plan (CEMP) to be prepared by the EPC Contractor. Further details on the CEMP are provided in Section 2.4 of this EMS.

Table 2 Requirements of Condition C1 of SSD-6687

SSD-6687 Condition	Condition requirement	Location in this plan
Condition C1 – Environmental Management Strategy	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:	This EMS – whole document
	a. Provide the strategic framework for environmental management of the development;	Section 2
	b. Identify the statutory approvals that apply to the development;	Section 3
	c. Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4
	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;	Section 5.1 Section 5.2
	ii. Receive, handle, respond to and record complaints;	Section 5.3
	iii. Resolve any disputes that may arise;	Section 5.4
	iv. Respond to any non-compliance;	Section 6.4
	v. Response to emergencies; and	Section 8.3
	e. Include:	
	i. Reference to any strategies, plans and programs approved under the conditions of this consent; and	Section 2
	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.	Section 6
	Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Section 1.2



2 Environmental management framework

2.1 Environmental management system

This strategy is integrated with and forms part of the broader CWP Renewables ISO 14001 certified Environmental Management System. This includes for example processes related to incident management, risk assessment, training, and reporting.

The CWP Renewables Environmental Management System is structured generally in accordance with ISO 14001:2015's process of Plan-Do-Check-Act.

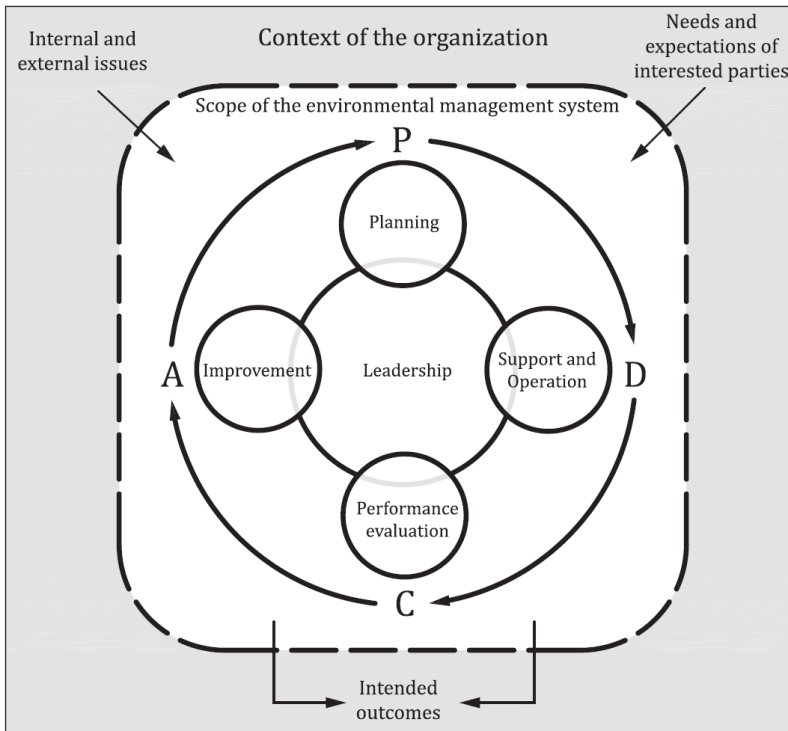


Figure 2 ISO 14001:2015 Plan-Do-Check-Act extract

2.2 Environmental policy

All Project activities will be undertaken in accordance with the relevant principles of the CWPR's Environmental Policy (CWPR-00-POL-02_Environmental) which is provided in Appendix A. This policy has been structured generally in accordance with ISO 14001:2015 and specifically commits to:

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

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

2.3 Environmental strategies, plans and programs

In addition to this Environmental Management Strategy required by Condition C1, the Development Consent requires several other strategies, plans, and programs (generally referred to as subplans) to be prepared for the development:

- **Final Layout Plan (Condition C8)**
A plan showing the details on siting of wind turbines, including micro-siting of any wind turbines and/or ancillary infrastructure, GPS coordinates of wind turbines, and a comparison to the approved layout.
- **Biodiversity Management Plan (BMP) (Condition B23)**
This plan describes the biodiversity management measures that will be implemented to avoid, minimise, and mitigate impacts associated with the Project, during design, construction and operation. Once approved, the BMP will be implemented by the Proponent and Contractors.
- **Bird and Bat Adaptive Management Plan (BBAMP) (Condition B24)**
Provides a program for monitoring potential impacts of the Project on birds and bats and details a strategy for managing and mitigating any significant bird and bat impacts arising from the operation of the Project. Once approved, the BBAMP will be implemented.
- **Heritage Management Plan (HMP) (Condition B26)**
Describes the heritage management measures that will be implemented to protect, minimise, and manage impacts associated with the Project, during design, construction and operation. Once approved, the HMP will be implemented.
- **Traffic Management Plan (TMP) (Condition B33)**
Describes the transport routes to be used for Project related traffic, road upgrade work requirements, dilapidation survey requirements, measures that will be implemented to minimise traffic safety impacts and disruptions to local road users during construction, upgrading or decommissioning works, measures that will be implemented to comply with the traffic/transport consent conditions and a driver's code of conduct. Once approved, the TMP will be implemented.
- **Emergency Plan (EP) (Condition B42)**
Details the fire hazards and risks that apply to the Project, provides measures to prevent or mitigate fires igniting, procedures that would be implemented if there is a fire on site or in the vicinity of the site, bushfire emergency planning and emergency contact details. Once developed, the Emergency Plan will be implemented.
- **Accommodation and Employment Strategy (AES) (Condition B45)**
Proposes measures to ensure sufficient accommodation for the Project workforce, provides options for prioritising the employment of local workers for construction and operation of the development, and consideration of cumulative impacts associated with other State Significant Development projects in the area. Once approved, the AES will be implemented.

These strategies, plans and programs provide the detailed mitigation measures necessary to minimise environmental impact and achieve compliance.

Once approved, copies of the above strategies, plans and programs will be made available on the Uungula Wind Farm website:

<https://www.squadronenergy.com/our-projects/uungula-wind-farm>

The Battery Storage Facility will be constructed as a separate Stage of the approved development. In accordance with Condition C3 of the Development Consent, UWF has obtained approval from the Planning Secretary to submit strategies, plans and programs relevant to the Battery Storage Facility on a staged basis (refer to Appendix C).

In accordance with that approval, prior to commencing construction of the Battery Storage Facility, the following documents will be prepared and submitted to the Planning Secretary for approval:

- Fire Hazard Analysis (Condition B38); and
- Fire Safety Study (Condition B39).

2.4 Contractor Environmental Management Plans

As part of the Environmental Management Framework of the Project, the EPC Contractor will prepare and implement a Construction Environmental Management Plan (CEMP) and various safety management plans prior to commencing construction. The CEMP will detail stage-specific procedures and plans to address specific requirements of the project approvals, the overarching EMS, and the subplans that are listed in Section 2.3.

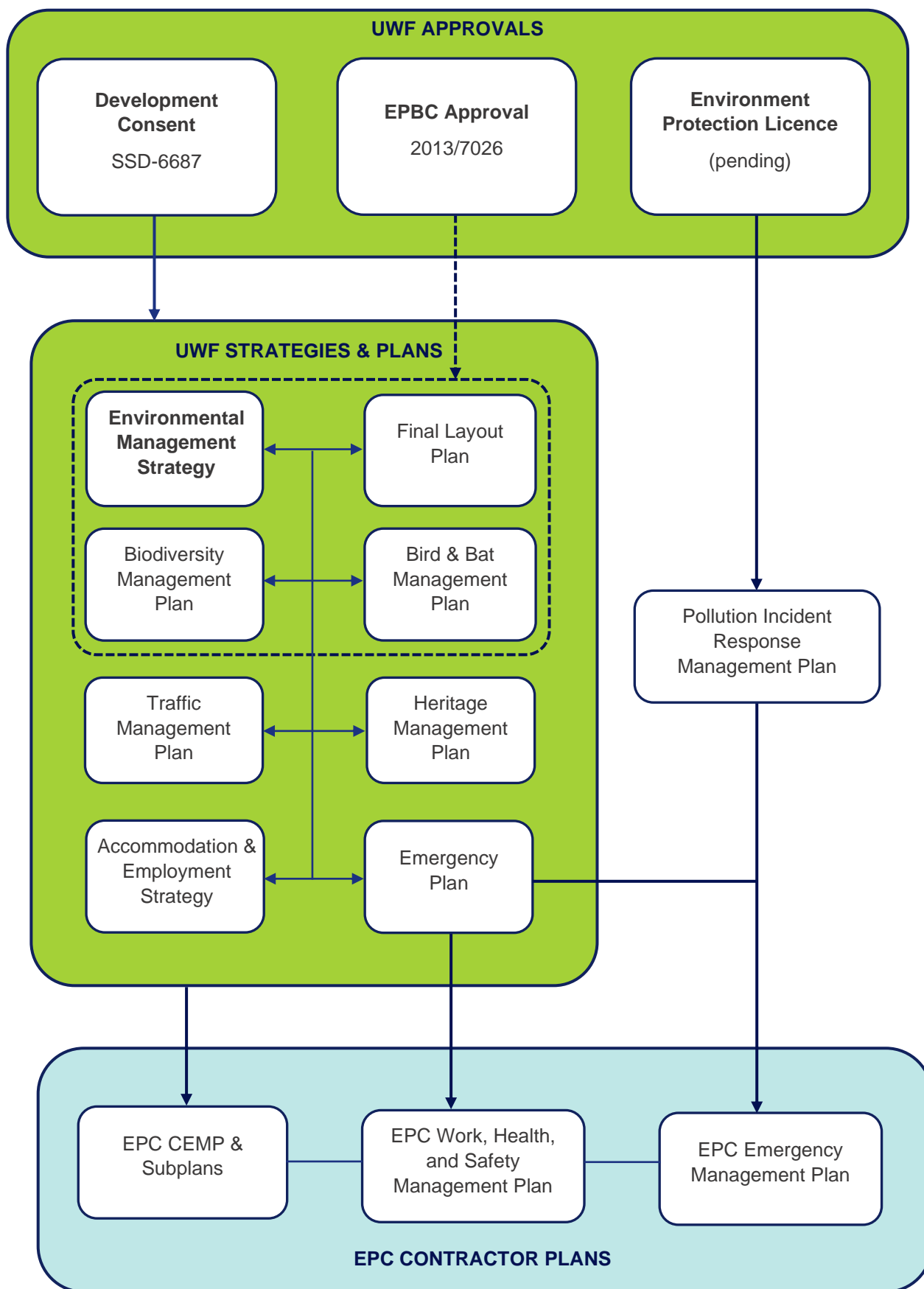


Figure 3 Relationship between UWF and EPC Contractor Management Plans

3 Statutory approvals

3.1 Overview of statutory approvals

The following Statutory Approvals have been obtained for the Ungula Wind Farm project:

- Development Consent SSD-6687
- Commonwealth EPBC Approval 2013/7026

Copies of the approvals are available on the Ungula Wind Farm website:

<https://www.squadronenergy.com/our-projects/uungula-wind-farm>

3.2 NSW Development Consent SSD-6687

The project has obtained State Significant Development Consent (SSD-6687, Mod 2) under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). An Environmental Impact Statement was prepared as part of the Development Application process, to assess the impacts of the development. The EIS and associated documentation can be found on the NSW Major Projects website:

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

In accordance with Condition A1 of the Development Consent, all reasonable and feasible measures will 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 Terms of Consent include:

- Condition A2 – The development may only be carried out:
 - a. in compliance with the conditions of the consent;
 - b. in accordance with all written directions of the Planning Secretary;
 - c. generally in accordance with the Environmental Impact Statement; and
 - d. generally in accordance with the Development Layout in Appendix 2 of the consent.
- Condition A3 – The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:
 - 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.
- Condition A4 - The conditions of the 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.

Additional conditions for Environmental Management (Development Consent Part C) are provided in Appendix B together with a description of how the Project will comply with those conditions.

All conditions of the consent are incorporated into Ungula Wind Farm's internal Compliance Tracking Matrix, which will be maintained by the Environmental Advisor throughout the development.

3.3 EPBC Approval 2013/7026

The project has obtained a Controlled Action Approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC 2013/7026). The EPBC Referral and related Decision Notices are available on the EPBC Public Portal at the following website:

<https://epbcpportal.awe.gov.au/all-referrals/project-referral-summary/?id=5dd96a1e-4c67-e511-b4b8-005056ba00ab>

In accordance with Condition 8 of the EPBC Approval 2013/7026, the following plans will be submitted electronically to the Minister once approved by the NSW Planning Secretary:

- Biodiversity Management Plan (BMP) (Condition B23);
- Bird and Bat Adaptive Management Plan (BBAMP) (Condition B24);
- The Environmental Management Strategy (Condition C1); and
- Final Layout Plan (Condition C8).

All conditions of the EPBC Approval are incorporated into Ungula Wind Farm's internal Compliance Tracking Matrix (refer to Section 6.5), which will be maintained by the Environmental Advisor throughout the development.

3.4 Additional approvals, permits, and licences

Table 3 identifies additional approvals/permits/licences that apply to the Development.

Table 3 Additional approvals, permits, and licenses

Approval type	Activity relating to approval	Timing	Approval Authority
Environment Protection Licence <i>Protection of the Environment Operations Act 1997</i> <i>Protection of the Environment Operations (General) Regulation 2022</i>	Required to carry out Scheduled Activities: <ul style="list-style-type: none"> • Crushing, grinding and separating • Electricity generation – Electricity works (wind farms) 	Prior to commencement of 'construction' of the Ungula Wind Farm.	NSW Environment Protection Authority
Heavy vehicle permits for the use of over-dimensional vehicles <i>Roads Act 1993</i>	Required for the transport of over-size over-mass components to the project site.	Prior to transporting over-size over-mass components.	National Heavy Vehicle Regulator
Road upgrade approval (Section 138) <i>Roads Act 1993</i>	Required for road upgrades	Prior to undertaking any road upgrades	Dubbo Regional Council
Works Authorisation Deed (WAD)	Required to undertake roadworks on the State road network and/or traffic control signals.	Required prior to undertaking road upgrades within the State road network.	Transport for NSW
Water Access Licence <i>Water Management Act 2000</i>	Water extraction for construction activities e.g. cement manufacture and civil construction activities.	A WAL will be obtained, if required, prior to taking any water.	Water NSW

Approval type	Activity relating to approval	Timing	Approval Authority
Water Supply Work Approval <i>Water Management Act 2000</i>	Required to authorise the holder to construct a water supply work at a specified location (eg. to install and operate a pump or bore).	A Water Supply Work Approval would be obtained, if required, prior to installing and operating any water supply work.	Water NSW
Licence over Crown Land <i>Crown Land Management Act 2016</i>	Wind farm infrastructure and works located on Crown land, roads and waterways		Water NSW

4 Role and responsibility

4.1 Structure and responsibility

UWF, as the Proponent, is ultimately responsible for ensuring compliance of the Project with the State and Commonwealth environmental approval requirements for environmental management throughout the lifecycle of the Project. UWF will ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of the consent relevant to activities they carry out in respect of the development.

UWF will engage an engineering, procurement, construction (EPC) contractor who will be responsible for design and construction of the Development. UWF will provide this EMS to the EPC, who will be responsible for preparing a construction environmental management plan (CEMP) to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

The EPC's CEMP will include roles and responsibilities, reporting procedures, authorisations for managing environmental incidents, non-compliance, environmental management and mitigation, risk assessment and inspection and audit of the Development during the design and construction phase. These obligations are detailed in the contract between the two parties.

The EPC's CEMP will be prepared before the commencement of construction and will be reviewed by the Proponent. The EPC's CEMP will be periodically reviewed and where necessary revised by the EPC to reflect the stage of construction and environmental risks associated with that stage of construction. UWF will review the EPCs documentation to confirm consistency with the requirements of this EMS and subplans.

During operation, UWF will enter a separate contract for the operational management of the Development. UWF's EMS will be revised to reflect the operational status of the Project, and this EMS will be provided to the operational contractor who will be responsible for preparing an operational environmental management plan (OEMP) to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

UWF will undertake audits and inspections of the contractors to assess compliance and environmental management. The scope and frequency of the environmental audits is described in Section 6. The contractors will be required to keep and supply records that support compliance and environmental obligations to UWF. Incidents and non-conformances must be reported to UWF in accordance with the timeframes and to meet the requirements specified in the Contract, and as described in Section 7.

Table 4 provides a general summary of the intended roles and likely responsibilities of the key personnel.

Table 4 Key roles and responsibilities

Role	Responsibility
Proponent's Project Manager	<ul style="list-style-type: none">• Responsible for implementation of CWP Renewables Environmental Policy;• Responsible for approval and management of EPC Contractor;• Responsible for delivery of the Project in accordance with this EMS, associated plans and statements and State and Commonwealth conditions of approval;• Review and approve Project design changes, and update Project Environmental Officer and Project Community Officer;• Provide adequate resources to allow the implementation of the Project EMS;• Issue non-conformance notices and to issue actions to avoid or minimise potential environmental impacts, and failing the effectiveness of such steps, order cessation of a specific activity;• Ensure all Project personnel attend an environmental site induction prior to commencing work; and• Hold regular Project team meetings.

Role	Responsibility
Project Environmental Advisor	<ul style="list-style-type: none"> • Ensure site specific environmental requirements are fulfilled and be the primary point of contact for community and liaison; • Ensure sub-contractors and agents comply with the EMS, management plans and programs; • Undertake environmental surveillance, auditing and reporting; • Be the primary point of contact for regulatory agency liaison; • Oversee environmental monitoring; • Report to the Proponent's Project Manager on environmental performance of the EPC and sub-contractors; • Ensure the community is well informed of activities at the Project site, and activities which may affect the Community and their interests; • Ensure all staff and contractors are aware of the community; and • Consultation requirements and complaints protocols.
Independent Environmental Auditor	<ul style="list-style-type: none"> • Review the adequacy of the measures undertaken to deliver the Project in accordance with the EMS, management plans, programs, Development Consent and Commonwealth approval. To be undertaken within six months of the commencement of construction and every three years thereafter, consistent with the requirements of the Approval; • Request reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, direct that relevant actions be ceased immediately; and • Provide an audit report to be forwarded to the Secretary or Minister as relevant that: <ul style="list-style-type: none"> – assesses whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under the consent; and – recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under the consent
EPC Project Manager	<ul style="list-style-type: none"> • Overall responsibility for all contractors and subcontractors involved in the Project; • Develop the Risk Management Plan for construction, and maintaining that plan throughout construction; • Consult with Proponent's Project Manager in relation to all Project design plan changes; • Ensure adequate resources are available for all contractors and subcontractors to deliver the Project in compliance with the EMS and other relevant documents; • Ensure all contractors and subcontractors are inducted prior to commencing work; • Hold regular Project team meetings and toolbox talks, ensuring information is shared between all site personnel; and • Support and attend Community Consultative Committee (CCC) meetings at the request of the Proponent's Project Manager.

Role	Responsibility
EPC Environmental Advisor	<ul style="list-style-type: none"> • Obtain the relevant licences and approvals for construction including any quarry licences and commercial water licences; • Implementation, monitoring and performance against CEMP commitments (as consistent with the Development Consent and associated management plans); • Manage environmental incidents in accordance with Section 8; • keep environmental related registers including compliance, waste tracking, complaints, training, incidents and non-conformance accurate and up to date; • Undertake regular (at least weekly) environmental inspection and provide advice to ensure compliance with relevant approvals and associated management plans under the Development Consent; • Prepare reports (at least fortnightly) on compliance to the satisfaction of the Project Environmental Officer; • Prepare environmental induction training materials in accordance with the EMS and associated plans; and • Delivery of the management plans and programs identified in Section 2.3, and the additional responsibilities identified in the Biodiversity Management Plan and heritage related controls (e.g. Chance Finds Protocol).
All Employees and Contractors	<ul style="list-style-type: none"> • Complete a site induction prior to commencing works on site; • Attend all environmental training as required; • Comply with the environmental controls in this EMS and all associated plans, sub plans and strategies; • Undertake all activities in accordance with agreed procedures and work methods; • Implement the actions identified in their management plans and programs in order to comply with the Development Consent conditions; and • Follow instructions of the Project Environmental Officer.

5 Communication procedures

5.1 Community consultative committee

A Community Consultative Committee (CCC) has been established for the Development, in accordance with Condition A20 of the consent. The CCC will operate in accordance with the *Community Consultative Committee Guidelines for State Significant Projects (2016)* or its latest version.

The frequency of committee meetings is determined by the committee members, after considering factors such as the stage of the project and level of public interest. As such, the frequency may vary over time as the project moves through the different stages of development, operation, and decommissioning. Scheduling of the CCC meetings will be determined at each meeting and recoded in the minutes. A minimum four weeks' notice is required to convene a regular meeting.

It is proposed that CCC meetings will be held on a quarterly basis during construction of the project, and 6-monthly during operations.

Any member of the committee may ask the independent chairperson to convene a meeting of the committee if there are important or urgent matters requiring consideration. The independent chairperson would decide if a meeting is warranted or if the matter can be addressed in other ways. A minimum two weeks' notice is required to convene an extraordinary meeting.

The Independent Chairperson for the UWF CCC is Garry West: garrybwest@bigpond.com

Minutes from the CCC meetings are published on the Developments website.

5.2 Information sharing

The Proponent will share and provide information to the relevant Agencies in accordance with the State and Commonwealth conditions of consent, as described in Section 7 and 8, and notification procedures described in the relevant management plans listed in Section 2.3.

Information sharing with the community and other stakeholders is described below.

Website

UWF has a dedicated website. The website is regularly updated, will be maintained for the life of the Development to provide key updates and information to the community, including:

- Information about the Development, including a Final Layout Plan;
- Contact details (phone, email, postal address);
- Current Development status and projected timeline;
- The Environmental Impact Statement;
- Statutory approval documentation;
- The Plans, Strategies and Programs that are required under the conditions of the consent;
- Proposed staging plans/approvals for the development;
- Monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent. This will include:
 - Bird and Bat monitoring and related reports;
 - Operational noise monitoring and related reports;
- Complaints register, to be updated on a monthly basis;
- The minutes of CCC meetings;

- The annual Statement of Compliance with the EPL;
- Any independent environmental audit, and the Proponent's response to the recommendations in any audit; and
- Any matter required by the Planning Secretary.

Other information sharing mechanisms

Additionally, a combination of the following mechanisms will be implemented as required, to keep the local community and relevant agencies informed about the operation and environmental performance of the Development:

- Distribution of a newsletter to registered parties informing of updates to the Development via email (registrations are open to all stakeholders and can be made on the Developments website);
- Regular and ongoing community consultative committee (CCC) meetings;
- Publishing CCC meeting minutes on the Developments website;
- Maintaining a complaint register and publishing monthly on the Developments website;
- Reporting incidents and non-conformances to relevant government agencies;
- Publishing annual environmental performance reports and providing to relevant government agencies (i.e. Environment protection licence annual return, NSW independent audit and Commonwealth annual compliance report);
- Establishing a dedicated telephone line and email address for enquiries;
- Newspaper advertisement, where appropriate;
- Phone, postal and face to face; and
- Community open days.

5.3 Complaints

Receiving complaints

Complaints and enquiries about the Development can be received in the following ways:

- Project email address: info@uungulawindfarm.com.au
- Phone, via the complaints and issues contact point: [0488 820 191](tel:0488820191)
- Post: [PO Box 1708, Newcastle, NSW 2300](#)
- The CCC: and
- Face to face.

For the duration of construction and operation, the email, phone, and postal contact methods will be maintained and published on the Developments website.

Complaint handling and response

Complaints received via any of the methods listed above will be provided to the Proponent's Project Manager within 24hrs of receiving the complaint. Additional UWF key personnel will be notified for action, including the Site Representative, Stakeholder Engagement officer, and the Project Environmental Advisor, as required.

Complaints and enquiries will be responded to within 48 hours of receipt. Initial contact with the complainant will either outline actions taken to resolve the complaint or a holding statement while the complaint is being investigated.

Specific procedures for handling traffic related complaints are described in Section 6.4 of the TMP.

All complains will be recorded in the Complaint Register which will be maintained by the Project Environmental Advisor. The register will include:

- Date and time of the complaint;
- Type of communication (i.e. telephone, mail, meeting, email etc.);
- Name, address, contact telephone number of complainant/enquirer (where available);
- Nature of the complaint and enquiry;
- Actions taken in response including any associated timeframes for implementing the action;
- If no action was taken, the reason why no action was taken; and
- When and how the complainant/enquirer was notified of the outcome or provided an answer.

The Complaints Register will be placed on the website (noting personal information relating to the complaint or the person making the complaint will be removed) and updated monthly.

5.4 Dispute resolution

It is the Developments aim to maintain a good relationship with all internal and external stakeholders so that no disputes eventuate. All efforts will be made to resolve a dispute internally with the affected party.

When a complaint cannot be resolved and a dispute has arisen:

- An investigation will be initiated by the Proponent's Project Manager, with input from Stakeholder Engagement Officer, Legal Counsel, relevant technical/subject matter expert and relevant parties as required, to clarify the dispute and actions taken to date.
- An investigation will be undertaken to assess the nature of the dispute and possible resolution with the aim of reaching mutual agreement between parties.
- If necessary, an appropriately qualified and experienced independent person or third party, (eg. a technical or subject matter expert) may be asked to provide advice on the investigation and/or facilitate mediation to reach a resolution. There may be some circumstances where it is appropriate to involve the Australian Energy Infrastructure Commissioner to assist with the dispute resolution process, if the complaint or dispute has previously been referred to Commissioner.
- If agreement cannot be achieved after 12 months of registering the original complaint, either party may refer the dispute to the Planning Secretary for resolution in accordance with the Development Consent. This includes disputes relating to:
 - Visual impact mitigation measures (Condition B2);
 - Road upgrades to be implemented (Condition B30);
 - Scope and implementation of road maintenance and remedial works (Condition B31);
 - Aviation hazard lighting (Condition B4); and
 - Mitigation measures implemented in response to disruptions to radio communications (Condition B37).

6 Environmental monitoring and compliance management

Environmental monitoring will be conducted to measure performance of the EMS, including the effectiveness of environmental control measures, and compliance with the project statutory approvals, licences, plans, strategies, and programs.

Environmental monitoring of the development will be conducted in several ways, including:

- Environmental inspections (see Section 6.1);
- Environmental audits (see Section 6.2); and
- Specific monitoring and measurement of a particular environmental aspect as required under the development consent (E.g. operational noise monitoring).

6.1 Environmental inspections

A range of environmental inspections will be conducted by the Proponent and the EPC Contractor to evaluate the effectiveness of environmental controls and general compliance with the implementation of the EMS (and associated strategies, plans and programs) for site-based activities.

The EPC Contractor must undertake regular (at least weekly) environmental inspections of all work areas. The outcomes of the environmental inspections will be reported within an environmental inspection checklist. The checklist will be developed as part of the EPC Contractors CEMP. The checklist will incorporate a range of environmental inspection criteria to document compliance with, and effectiveness of, the various mitigation measures and controls specified within this EMS and within the other management plans/ strategies/ programs required under the development consent.

A report must be provided to the Proponent at least fortnightly documenting environmental compliance.

The Proponent's Environmental Advisor will undertake environmental inspections (monthly, or more frequently as required) to monitor compliance with the Project Approvals and adherence to the Strategies, Plans and Programs.

6.2 Environmental auditing

Independent Environmental Audits requirements of SSD-6687

In accordance with Condition C15 of SSD-6687, Independent Audits of the development will 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.

During the construction phase, Independent Environmental Audits will be conducted:

- Within 12 weeks of the commencement of construction
- Within 26 weeks of the initial Independent Audit, or as otherwise agreed by the Secretary.
- Every 26 weeks thereafter, unless otherwise agreed by the Secretary.

During Operational phase, Independent Environmental Audits will be conducted at intervals no greater than 3 years, or as otherwise agreed by the Secretary.

The proponent will submit electronic copies of the Independent Audit Reports, and the Proponent's response to the audits, to the DPE via the Major Projects Portal no later than 2 months after undertaking the independent audit site inspection.

Independent Audit reports will be published on the project website in accordance with Condition 16 of SSD-6687.

Independent Audits requirements of EPBC Approval 2013/7026

In accordance with Condition 12 of the EPBC Approval, UWF will ensure that independent audits of compliance with the EPBC Approval conditions are conducted as requested in writing by the Minister.

In accordance with Condition 13, for each Independent Audit requested by the Minister, UWF will:

- a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department.
- b. submit an audit report to the Department within the timeframe specified in the approved audit criteria.

Internal Project Audits

UWF will undertake internal audits to verify compliance with the Developments statutory approvals, this EMS, and the associated Strategies, Plans and Programs. The undertaking of the audits will be in accordance with a risk-based audit schedule, which will be developed by the UWF Project Manager and Environmental Advisor. Internal audits will be conducted on a quarterly basis during the construction phase. The audit schedule will identify the scope of the audit, timing of the audit, and the person(s) who will conduct the audit.

The internal project audits will be coordinated by the Project Environmental Advisor together with the Project Manager.

Any identified non-compliances with the development consent will be managed in accordance with Section 6.4.

6.3 Environmental monitoring summary

A monitoring plan for the development has been prepared in the form of a Table (Table 5). Table 5 sets out all monitoring to be carried out in relation to the development, including the method, timing, responsibility, and monitoring outputs (i.e. records/reporting type).

Note, Table 5 does not provide comprehensive details of all monitoring required for the development. In some cases, the full monitoring requirements are detailed within the appropriate strategy / plan /program that has been prepared in accordance with the requirements of the development consent. In these instances, a reference to the relevant strategy / plan / program is provided where the full monitoring details can be found.

Table 5 Summary of the monitoring obligations under SSD-6687

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Construction noise monitoring	SSD Condition B8 & B9	EMS Table 5 Contractors CEMP	<p>Audible construction noise will be monitored throughout the construction of the development.</p> <p>Noise generated by any construction activities will be managed in accordance with the requirements outlined in the Interim Construction Noise Guideline(DECC, 2009)</p> <p>Construction workers will only operate plant and equipment that are in good working order, within permitted operating hours and in accordance with the technical specifications of the equipment and plant.</p>	<p>Daily during construction activities.</p> <p>During weekly environmental inspections.</p>	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	<p>Environmental inspection checklists by the EPC contractor.</p> <p>Internal audit reports by the Proponent, confirming that reasonable steps are being taken to minimise construction noise emissions.</p>
Blast overpressure monitoring	SSD Condition B11	EMS Table 5 Contractors CEMP	<p>Monitoring of blast overpressure to ensure that blasting does not exceed the noise criteria set out in Condition B11 at any non-associated residence.</p> <p>The type of monitoring and method will depend on the nature and methodology of the blasting.</p>	Monitoring will typically be undertaken for the first blast event to verify the predictions of any blast overpressure modelling. Additional blast monitoring to be advised by technical noise/blast monitoring expert.	EPC Contractor.	Blast monitoring report will be prepared by the EPC Contractor (or their appointed consultant).

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Operational noise monitoring	SSD Condition B14	EMS Table 5	Operational noise monitoring will be undertaken to determine whether the development is complying with the relevant conditions (Conditions B12 & B13). Noise generated by the operation of ancillary infrastructure will be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (2017) (or its equivalent).	Monitoring to be completed within 6 months of commencing Operation of the wind farm.	EPC Contractor , in consultation with the Proponent.	Noise compliance monitoring report will be prepared by the EPC Contractor (or their appointed consultant). UWF will submit the report to the NSW DPE and NSW EPA.
Further operational noise monitoring	SSD Condition B15	EMS Table 5	The Applicant must undertake further operational noise monitoring of the development if required by the Planning Secretary. A report will be prepared summarising the outcomes of the monitoring.	In accordance with the requirement of the Planning Secretary.	EPC Contractor , in consultation with the Proponent.	UWF will submit a copy of the monitoring results to the DPE and the EPA, as required.
Air quality monitoring	SSD Condition B16	UWF EMS Table 5 Contractors CEMP	The construction activities will be visually monitored to ensure that dust and fume emissions of the development are being minimised using reasonable and feasible measures.	Daily visual monitoring during construction activities that have the potential to generate dust (including operation of crushing plant). During weekly environmental inspections.	EPC Contractor. Proponent may also conduct environmental monitoring in relation to air quality management through inspections and audits.	Environmental inspection checklists, internal audit reports (see Section 6.2), confirming that reasonable steps are being taken to minimise construction noise emissions.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Erosion and sedimentation monitoring	SSD Condition B19	UWF EMS Table 5 Contractors CEMP Contractors Erosion and Sediment Control Plan	Throughout construction, the performance and effectiveness of erosion and sediment controls will be visually monitored by way of monthly environmental inspections, or following rain events.	During weekly environmental inspections. Post-rainfall inspections. During internal audits, as required.	EPC Contractor. Proponent may also conduct environmental monitoring/internal audits in relation to erosion and sediment controls through inspections and audits.	Environmental inspection checklists, internal audit reports (see Section 6.2), documenting that erosion and sediment controls are performing effectively.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Biodiversity: Monitoring compliance with the impact minimisation measures in the Biodiversity Management Plan	SSD Condition B23	UWF Biodiversity Management Plan (latest approved version) Contractors CEMP	Monitoring the implementation and effectiveness of the biodiversity management measures within the BMP (refer to Section 3 of the BMP). Requires monitoring of: <ul style="list-style-type: none"> • Clearing of native vegetation, including progressive tracking of clearing and disturbance area impacts. • Impacts to key fauna habitats • Impacts to fauna • Indirect impacts to fauna • Rehabilitation and revegetation activities • The protection of native vegetation and key fauna habitat outside the approved disturbance area • Salvage and reuse of biodiversity resources • Collecting and propagating seed (where relevant) • Weeds and feral pests • Erosion • Bushfire preparedness. 	Monitoring required daily during clearing activities. Also, during weekly environmental inspections. Vegetation clearing and disturbance register to be updated at least fortnightly.	EPC Contractor. The Proponent may also conduct monitoring through inspections and audits.	Environmental inspection checklists. Vegetation clearing and disturbance register. Internal audit reports (see Section 6.2).
Bird and bat impact monitoring	SSD Condition B24	UWF Bird and Bat Adaptive Management Plan (latest approved version)	Monitoring of the effectiveness of the measures within the BBAMP, and any bird and bat strikes on site. An annual report will be prepared to document the results of the operational monitoring.	Frequency of monitoring will be set out in the BBAMP, which will be prepared prior to commencement of commissioning.	The Proponent.	Reporting outputs will be set out in the BBAMP.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Aboriginal and non-aboriginal heritage monitoring	SSD Condition B26	UWF Heritage Management Plan (latest approved version) Contractors CEMP	Monitoring the implementation and effectiveness of the Heritage management measures within the HMP (refer to Section 3 of the HMP). Monitoring to ensure no-go zones are demarcated and that the demarcation controls/barriers are intact / undamaged and not breached.	Daily during any work activities occurring near heritage no-go zones. During weekly environmental inspections.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to heritage through inspections and audits.	As set out in the UWF HMP. Environmental inspection checklists. Internal audit reports (see Section 6.2).
OSOM Transport monitoring	SSD Condition B27	UWF Traffic Management Plan (latest approved version)	Monitoring to ensure all OSOM vehicles associated with the development are travelling to and from the site in accordance with the approved OSOM Route per Appendix 8 of the development consent and as described in the Approved TMP (refer to Section 3 and Section 6.14 of the TMP).	Ongoing daily monitoring for the duration of OSOM deliveries. During weekly environmental inspections.	EPC Contractor. The proponent may also conduct monitoring in relation to OSOM movements through site inspection and audits.	OSOM permits. Contractor records. Internal audit reports (see Section 6.2).
Project vehicle monitoring	SSD Condition B28	UWF Traffic Management Plan (latest approved version)	Monitoring to ensure that all heavy and light vehicles associated with the development are travelling to and from the site via Twelve Mile Road (west) and the approved site access point on Twelve Mile Road (unless the Secretary agrees otherwise).(refer to Section 3 and 6.16.2 of the TMP)	Ongoing daily monitoring for the duration of the development. During weekly environmental inspections.	EPC Contractor. The proponent may also conduct monitoring in relation to vehicle movements through site inspection and audits.	Environmental inspection checklists. Contractor records. Internal audit reports (see Section 6.2).
Traffic monitoring	SSD Condition B33	UWF Traffic Management Plan (latest approved version) Contractors CEMP	Monitoring of the effectiveness of the measures within the TMP (refer to Sections 6.2.3 and 6.16.4 of the TMP).	During weekly environmental inspections.	EPC Contractor. The proponent may also conduct monitoring in relation to traffic management through site inspection and audits.	Environmental inspection checklists. Internal audit reports (see Section 6.2).

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Monitoring Asset Protection Zones	SSD Condition B41	UWF Emergency Plan Contractors CEMP	Visual monitoring of established Asset Protection Zones to ensure maintenance requirements are met as detailed in the Emergency Plan.	Ongoing during construction During weekly environmental inspection.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to proper maintenance of APZs.	Environmental inspection checklists. Internal audit reports (see Section 6.2).
Monitoring for bushfire danger	SSD Condition B42	UWF Emergency Plan Contractors CEMP	RFS websites will be monitored to determine Total Fire Ban days and Fire Danger Ratings relevant to the Project site.	Daily during works.	EPC Contractor.	Daily pre-start meeting materials.
Waste management monitoring	SSD Condition B44	UWF EMS Table 5 Contractors CEMP	Visual monitoring to ensure that waste is being classified, stored, handled, transported and disposed in accordance with the requirements of the consent, EPL and requirements of the EPA's <i>Waste Classification Guidelines</i> .	Daily during construction. During weekly environmental inspections.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to waste management.	Environmental inspection checklists. Audit reports, documenting that waste is being appropriately managed.
Accommodation and employment status	SSD Condition B45	UWF Accommodation and Employment Strategy (latest approved version)	Documentation monitoring of the effectiveness of the AES over the life of the development, including monthly monitoring during construction.	Monthly throughout construction. Bi-annually throughout the life of the operational development.	EPC Contractor. The Proponent will monitor throughout the life of the development.	Monthly EPC reports. Internal audit reports (see Section 6.2).
Monitoring of area exposed at any one time	SSD Condition B47	UWF EMS Table 5 Contractors CEMP	Visual monitoring of the works to ensure that the total area exposed at any time is being minimised as far as practicable.	Weekly during construction During weekly environmental inspections.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to minimising the total area exposed, through inspections and audits.	Environmental inspection checklists. Internal audit reports (see Section 6.2), documenting that work is being conducted in a way that minimises exposure.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Monitoring of rehabilitation outcomes	SSD Condition B47	UWF Biodiversity Management Plan Contractors CEMP	Visual monitoring of rehabilitation activities to ensure that interim or permanent measures are effectively minimising dust generation, soil erosion, or weed incursion.	Weekly during rehabilitation phase of the development. During environmental inspections.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to the success of interim and permanent rehabilitation measures.	Environmental inspection checklists. Internal audit reports (see Section 6.2), documenting that rehabilitation is meeting the objectives of the BMP and the Rehabilitation Management Program.
Independent Environmental Audits	SSD Condition C15	UWF EMS Section 6.2	Independent Environmental Audit in accordance with Section 6.2 and the Departments Independent Audit Post Approval Requirements (May, 2020).	Within 12 weeks of commencing construction, then at least every 26 weeks thereafter (refer Section 6.2)	The Proponent	Electronic copy of Independent Audit Reports to be submitted to the DPE via Major Project portal, within 2 months of conducting the audit site inspection. Copies of Independent Audit reports will be placed on the Project website.
Internal Project Environment Audits	SSD Condition C1	UWF EMS Section 6.2	Internal audit conducted in accordance with UWF audit schedule (to be developed).	Quarterly during construction (refer Section 6.2)	The Proponent	Internal Audit report – to be provided to the Project Manager.

6.4 Response to non-compliance

What is a non-compliance?

In accordance with the Development Consent, a non-compliance is defined as:

An occurrence, set of circumstances or development that is a breach of this consent.

A non-compliance with the EPBC Approval is a non-compliance with any Condition of the EPBC Approval or a commitment made in a plan required by the EPBC Approval (BMP and BBAMP).

Non-compliance identification and investigation

Non-compliance may be identified in a number of ways, such as internal or external audit, inspection, incident investigation or review.

Where a non-compliance has been identified:

1. The non-compliance will be notified to the UWF Project Manager and Project Environmental Advisor.
2. The UWF Project Manager and Project Environmental Advisor (or delegate) will ensure that the non-compliance is investigated by the responsible party (the party responsible for the non-compliance) in order to ascertain the source, reason, and implications of the non-compliance.
3. Corrective/ preventive actions will be developed and implemented by the responsible party, in consultation with UWF, and may include:
 - Amendment of the EMS or relevant strategy, plan, program, or procedure;
 - Additional control measures;
 - Staff training;
 - Disciplinary actions.
4. The responsible party will prepare and submit a report to UWF which documents the above information.

Notification of non-compliance to NSW Planning Secretary (DPE)

In accordance with Condition C11 of the development consent, UWF will provide written notification to the Planning Secretary via the Major Project website within seven calendar days of becoming aware of a non-compliance with the development consent. The written notification will identify the development and the application number (Uungula Wind Farm; SSD-6687), the condition of consent that the development is non-compliance with, the way in which it does not comply, the reasons for the non-compliance (if known), and what actions have been taken, or will be taken, to address the non-compliance.

It is noted that a non-compliance which has already been notified as an Incident does not need to also be notified as a non-compliance.

Notification of non-compliance to Commonwealth Department (DCCEEW)

In accordance with Condition 11 of the EPBC Approval, UWF will provide a written notification to the Department of any non-compliance with the conditions of the EPBC Approval, or the commitments made in the related plans (EMS, BMP and BBAMP).

The notification will be given to the Department as soon as practicable, and no later than two business days after becoming aware of the non-compliance, and will provide the following information:

- a. Any condition which is in breach,
- b. A short description of the non-compliance, and

- c. The location (including coordinates), date, and time of the non-compliance. In the event the exact information cannot be provided, provide the best information available.

In accordance with Condition 11 of the EPBC Approval, UWF will provide further written information to the Department of the non-compliance. The further notification will be provided no later than 10 business days after becoming aware of the non-compliance, and it will specify:

- 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, and
- c. The method and timing of any remedial action that will be undertaken by the approval holder.

6.5 Compliance tracking matrix

A Compliance Tracking Matrix is an internal document that has been developed as a tool for tracking compliance with the various Project Statutory Approvals. The Environmental Advisor will maintain the Compliance Tracking Matrix throughout the development.

The Compliance Tracking Matrix will undergo routine review and update by the Environmental Advisor, to reflect the compliance status of the Development. The Matrix will also be updated as required, in response to the outcomes of environmental monitoring (refer to Section 6.1 – 6.3), non-compliance identification (Section 6.4) or on satisfying the compliance obligations under the conditions of project Statutory Approvals / additional approvals and licences.

7 Environmental reporting and notification

7.1 Summary of reporting and notification obligations

A summary of the reporting and notification obligations from the Development Consent and the EPBC Approval is provided in Table 6.

Note, that on receipt of additional approvals and licences (such as an Environment Protection Licence), Table 6 will be updated to incorporate the relevant reporting and notification obligations.

Table 6 Reporting and notification obligations under SSD-6687

Condition	Report / notification description	Timing	Report / notify to
Development consent (SSD-6687)			
B35	<p>The Applicant must provide the following information to CASA, Airservices Australia, and the RAAF (together the authorities):</p> <ol style="list-style-type: none"> co-ordinates in latitude and longitude of each wind turbine and mast; the final height of each wind turbine and mast in Australian Height Datum; ground level at the base of each wind turbine and mast in Australian Height Datum; confirmation of compliance with any OLS; and NSW Government 17 Ungula Wind Farm Planning and Environment (SSD 6687) details of any proposed aviation hazard lighting. 	Prior to constructing any wind turbine or wind monitoring mast.	Civil Aviation Safety Authority (CASA), Airservices Australia and the RAAF.
B36	<p>The Applicant must:</p> <ol style="list-style-type: none"> provide confirmation to the authorities that the information that was previously provided remains accurate; or update the information previously provided. 	Within 30 days of the practical completion of any wind turbine or mast.	Civil Aviation Safety Authority (CASA), Airservices Australia and the RAAF.
B41 (e)	Notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.	Following construction and prior to commencing operations.	Wellington Local Emergency Management Committee.
C7	The Applicant must notify the Department of the date of commencement, or cessation, of construction, operations, upgrading or decommissioning phases.	Prior to commencing the construction, operations, upgrading or decommissioning phases.	Department of Planning and Environment, via Major Projects website portal.
C7	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.	Prior to commencing construction of the Wind Farm (Stage 1) and Battery Storage Facility (Stage 2).	Department of Planning and Environment, via Major Projects website portal.

Condition	Report / notification description	Timing	Report / notify to
C8	The Applicant must submit detailed plans of the final layout of the development, which include: <ul style="list-style-type: none"> 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. 	Prior to commencing construction.	Department of Planning and Environment, via Major Projects website portal.
C9	The Applicant must submit work as executed plans of the development and showing comparison to the final layout plans to the Planning Secretary.	Prior to commencing operations, or prior to upgrades of any turbines or ancillary infrastructure.	Planning Secretary, via Major Projects website portal.
C10	Notification & reporting of incidents – as described in Sections 8.1 & 8.2 of this EMS.	Immediately after the Applicant becomes aware of the incident	Department of Planning and Environment, via Major Projects website portal.
C11	Notification and reporting of non-compliances – as described in Section 6.4 of this EMS.	Within seven (7) days after the Applicant becomes aware of the non-compliance.	Department of Planning and Environment, via Major Projects website portal.
C14	The Applicant must notify the owners of: <ul style="list-style-type: none"> a. 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 b. any non-associated residence within 5 km of any approved wind turbine of their rights under condition B2 of Schedule 2. 	Prior to commencing construction.	The relevant landowners, per the condition.
C15	Independent Audit reports will be prepared and submitted to the DPE in accordance with the requirements of the Independent Audit Post Approval Requirements (2020).	Per the requirements of the Independent Audit Post Approval Requirements (2020).	Department of Planning and Environment, via Major Projects website portal.

Condition	Report / notification description	Timing	Report / notify to
EPBC Approval 2013/7026			
Condition 9	<p>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:</p> <ol style="list-style-type: none"> 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 	<p>By the 3 November each year (within 3 months of the anniversary date of the approval).</p> <p>Anniversary Date = 3 August.</p>	<p>Publish the compliance report on the project website:</p> <p>https://www.squadronenergy.com/our-projects/uungula-wind-farm</p> <p>Notify DCCEEW, via email:</p> <p>epbcmonitoring@environment.gov.au</p>
Condition 10	<p>Notification and reporting of any non-compliance relating to the EPBC Approval, as set out in Section 6.4 of this EMS.</p> <p>Notification and reporting of any incident relating to the EPBC Approval, as set out in Section 8.2 of this EMS.</p>	<p>No later than two business days after becoming aware of the incident or non-compliance.</p>	<p>Notify and report to DCCEEW, via email:</p> <p>epbcmonitoring@environment.gov.au</p>
Condition 11	<p>Further details of any non-compliance relating to the EPBC Approval, as set out in Section 6.4 of this EMS.</p> <p>Further details of any incident relating to the EPBC Approval, as set out in Section 8.2 of this EMS.</p>	<p>No later than 10 business days after becoming aware of the incident or non-compliance.</p>	<p>Report to DCCEEW, via email:</p> <p>epbcmonitoring@environment.gov.au</p>
Condition 13	<p>For each independent audit conducted under Condition 12 of the EPBC Approval, submit an audit report to the Department within the timeframe specified in the approved audit criteria.</p>	<p>Within the timeframe specified in the approved audit criteria.</p>	<p>Report to DCCEEW, via email:</p> <p>epbcmonitoring@environment.gov.au</p>

Condition	Report / notification description	Timing	Report / notify to
Condition 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.	Within 10 business days of receiving the Department's approval of the audit report.	Publish the report on the project website: https://www.squadronenergy.com/our-projects/uungula-wind-farm
Condition 15	After the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Within 30 calendar days after the completion of the action.	Notify and report to DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 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.	Notify DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 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.	Notify DCCEEW, via email: epbcmonitoring@environment.gov.au

8 Incident and emergency response

8.1 Response to an Incident under the Development Consent (SSD-6687)

In accordance with the Development Consent SSD-6687, an 'Incident' is defined as:

An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.

And the definition of 'Material Harm' is:

Is harm that:

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

All on-site key personnel must report a potential incident to the EPC Project Manager and Proponent Project Manager. The Proponent Project Manager in consultation with the Project Environmental Advisor (and the EPC Environmental Advisor, as required) will determine if the incident has caused or threatens to cause material harm.

If the Applicant becomes aware of an Incident pursuant to the Development Consent, the Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) will notify the Department of the Incident in writing via the Major Projects portal immediately in accordance with Condition C10. The immediate notification will identify the development (SSD-6687; Ungula Wind Farm) and will identify the location and nature of the Incident.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) will subsequently provide a written notification to the Planning Secretary within 7 calendar days after the Applicant becomes aware of an Incident. This written notification will be provided via the Major Projects portal and will:

- a. identify the development and application number (Ungula Wind Farm; SSD-6687);
- b. provide details of the Incident (date, time, location, a brief description of what occurred and why it is classified as an Incident);
- c. identify how the incident was detected;
- d. identify when the applicant became aware of the Incident;
- e. identify any actual or potential Non-compliance with conditions of consent;
- f. describe what immediate steps were taken in relation to the Incident;
- g. identify further action(s) that will be taken in relation to the Incident; and
- h. identify a project contact for further communication regarding the Incident

Within 30 calendar days of the date on which the Incident occurred or as otherwise agreed to by the Planning Secretary, the Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the Incident addressing all requirements below, and such further reports as may be requested.

The Incident Report must include:

- a summary of the Incident;

- outcomes of an Incident investigation, including identification of the cause of the Incident;
- details of the corrective and preventative actions that have been, or will be, implemented to address the Incident and prevent recurrence; and
- details of any communication with other stakeholders regarding the Incident.

For environmental incidents that don't cause or threaten to cause material harm to the environment, the Project Environmental Advisor and Proponent Project Manager will determine what external agencies need to be notified, if at all.

8.2 Response to an Incident under EPBC Approval (2013/7026)

In accordance with the EPBC Approval 2013/7026, an Incident is defined as:

Any event which has the potential to, or does, impact on one or more protected matter(s) other than as authorised by this approval.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must notify the Department in writing of any Incident pursuant to the EPBC Approval. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident.

The notification must specify:

- Any condition which is in breach,
- A short description of the incident, and
- The location (including co-ordinates), date, and time of the incident. In the event the exact information cannot be provided, provide the best information available.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must provide to the Department the details of any incident as soon as practicable and no later than 10 business days after becoming aware of the incident, specifying:

- Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future,
- The potential impacts of the incident or non-compliance, and
- The method and timing of any remedial action that will be undertaken by the approval holder.

8.3 Response to emergencies

Responses to actual or potential emergencies will vary depending on the nature, scale, and severity of the emergency. Types of emergencies could include fire, explosion, chemical spill, medical emergency, natural disaster, bomb threat, of violence.

Emergency response will be undertaken in accordance with specific emergency response plans to be developed for the project in accordance with the relevant Work, Health, and Safety Regulations. The emergency response process will generally be initiated in the following way in the event of an emergency:

- Raise the alarm;
- Implement the EPC Contractor Emergency Plan;
- For fire and bushfire emergencies, implement the Emergency Plan (Fire and Bushfire) prepared under Condition B42; and
- For pollution incident emergencies, implement the PIRMP.

External agencies and support will be requested in accordance with the decision hierarchy outlined in the EPC Contractor's Emergency Response Plan, which will be prepared prior to commencement of construction. The Proponent's Project Manager will be notified of the emergency as soon as practicable.

Table 7 Table of Emergency Plans relevant to the Project

Plan title	Details of Plan	Application of plan
Emergency Plan (Fire and Bushfire) – Condition B42	<p>In accordance with Condition B42 of the Development Consent, an Emergency Plan has been developed which specifically relates to fire and bushfire emergencies at the Project site. The purpose of the Emergency Plan is to:</p> <ul style="list-style-type: none"> • Identify the fire hazards, risks that apply to the Development; • Provide measures to prevent or mitigate fires igniting; • Provide procedures that would be implemented if there is a fire on-site or in the vicinity of the site; • Provide details of bushfire emergency planning; and • Provide emergency contact details. 	The Emergency Plan will be implemented in the event of a fire or bushfire emergency occurring on or threatening the project site.
Pollution Incident Response Management Plan	<p>A Pollution Incident Response Management Plan (PIRMP) will be prepared for UWF in accordance with the requirements of the POEO Act and the PIRMP Guideline (NSW EPA, 2022) and subject to an Environment Protection Licence.</p> <p>The PIRMP includes detailed information including, but not limited to:</p> <ul style="list-style-type: none"> • Communicating with regulatory and emergency response agencies • Description and likelihood of hazards • Pre-emptive actions to be taken • Inventory of pollutants • Safety equipment • Maps • Communicating with neighbours and the community • Minimising harm to persons on the premises • Actions to be taken during or immediately after a pollution incident • Staff training • Testing requirements. <p>The PIRMP will be reviewed annually.</p>	<p>The PIRMP will be implemented in the event of a pollution incident occurring on the project site.</p> <p>A copy of the PIRMP will be made available on the site at all times.</p>
EPC Contractor Emergency Response Plan	As the Principal Contractor for their work site, it is a legal requirement that the EPC Contractor develop a comprehensive Emergency Response Plan specific to the project site and EPC Contractor activities.	The EPC Contractor Emergency Response Plan will be implemented in the event of any emergency scenario on the project site

Plan title	Details of Plan	Application of plan
	<p>This Plan will be developed prior to commencement of construction to meet the requirements of relevant Work, Health, and Safety Regulations.</p> <p>The Emergency Response Plan will include information on Emergency Response including, but not limited to:</p> <ul style="list-style-type: none"> • Emergency procedures, such as site evacuation procedures, requirements for notifications to emergency services; • Actions to be undertaken during an emergency; • Site authority during events; • Effective communication on site during the emergency; • Muster points; • Emergency service and emergency contact numbers; • Requirements for testing of the emergency procedures and frequency of tests; and • Information, training, and instruction relevant to workers in relation to implementing the emergency procedures. <p>The EPC Emergency Response Plan will be complimentary to the existing Emergency Plan that has been developed in accordance with Condition B42 of the development consent (fire and bushfire emergencies), and the Pollution Incident Response Management Plan (PIRMP) that will be developed by the Proponent prior to commencing construction.</p>	<p>under the control of the EPC Contractor.</p>

9 EMS review

In accordance with Condition C2 of the Development Consent, the EMS (and any other relevant plans and programs) will be reviewed and, if necessary, revised within three months of the submission of:

- 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 the Development Consent.

If the EMS is updated, it will be submitted to the Planning Secretary for approval in accordance with Condition C3develop of the Development Consent. In accordance with Condition C5 of the Development Consent, if the updated strategy is approved by the Planning Secretary, the updated EMS will be implemented and will supersede the previous version of the EMS.

10 References

- Fairfull, S. & Witheridge, G. (2003). Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings. NSW Department of Primary Industries.
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- NSW Department of Planning & Environment (2015). Post-approval requirements for State significant developments Independent Audit Guidelines.
- NSW Department of Primary Industries (NSW DPI). (2004). Policy and Guidelines for Fish Friendly Waterway Crossings. NSW Department of Primary Industries, Sydney.
- NSW Department of Planning, Industry and Environment (DPIE) (May 2020). Requirement 2, Independent Audit Post Approval Requirements. Retrieved from: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>.
- State of New South Wales and the NSW Environment Protection Authority (2022). Guideline: Pollution Incident Response Management Plans. Retrieved from: <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/licensing/pirmp/22p3985-pollution-incident-response-management-plans-guideline.pdf?la=en&hash=C84A30067D639362EB96E0C6D2D3F9E0274D24F0>.

Appendix A Environmental Policy



ENVIRONMENTAL POLICY

CWPR-00-POL-Environmental

28 June 2022

REVISION CONTROL

Revision	Date	Issue	Author	Reviewed	Approved	Signature
000	17/05/21	1	Phaedra Reynolds	Leanne Cross	Jason Willoughby	
001	28/06/22	1	Alana Gordijn	Brendan McAvoy	Jason Willoughby	

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1 Introduction

1.1 Purpose

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

1.2 Scope

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

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

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

2 Policy

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

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

3 Variation

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

4 Relevant legislation, policies, and documents

Type	Title
Legislation	Work Health and Safety Act 2011
Legislation	Environment Protection and Biodiversity Conservation Act 1999
Legislation	Environmental Planning and Assessment Act 1979
Legislation	Protection of the Environment Operations Act 1997
Standard	ISO 14001:2015 – Environmental Management Systems

Appendix B Additional compliance requirements

Condition	Condition wording	Commitment to Compliance
REVISION OF STRATEGIES, PLANS AND PROGRAMS		
Condition C2	<p>The Applicant must:</p> <ol style="list-style-type: none"> 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 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: <ol style="list-style-type: none"> 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. 	<p>Condition is addressed in Section 10 of the EMS.</p> <p>The Proponent will ensure that Management Strategies, Plans, and Programs will be reviewed and updated in accordance with the requirements of this Condition.</p> <p>If a Strategy, Plan or Program is updated, then the Proponent will comply with the requirements of Condition C3 regarding approval.</p>
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS		
Condition C3	<p>With the approval of the Planning Secretary, the Applicant may:</p> <ol style="list-style-type: none"> 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); 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 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). 	<p>The Project will be developed in two stages:</p> <ul style="list-style-type: none"> Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'. Stage 2: Battery Storage Facility. <p>The Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2.</p> <p>All other Strategies, Plans and Programs will be prepared and submitted for Stage 1, and then updated for Stage 2 where required.</p> <p>Updated Strategies, Plans and Programs will be submitted to the Planning Secretary for approval in accordance with Condition develop(c).</p>
Condition C4	<p>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.</p>	<p>The Proponent will stage or update Strategies, Plans or Programs in consultation with the relevant identified party, unless the Secretary has agreed that the consultation is not required.</p>
Condition C5	<p>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.</p>	<p>Updated Strategies, Plans and Programs will supersede the previous versions of them and will be implemented in accordance with the relevant condition. Also, the plan will be updated on the project website in accordance with Condition C16.</p>

Condition	Condition wording	Commitment to Compliance
Condition 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.	<p>The Project will be developed in two stages:</p> <ul style="list-style-type: none"> • Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'. • Stage 2: Battery Storage Facility. <p>The Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2.</p> <p>All other Strategies, Plans and Programs will be prepared and submitted for Stage 1, and then updated for Stage 2 where required.</p>

NOTIFICATION OF DEPARTMENT

Condition 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.	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant will 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 will 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.
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FINAL LAYOUT PLANS

Condition C8	<p>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:</p> <ol style="list-style-type: none"> 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. <p>The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.</p>	Detailed plans of the final layout of the development will be submitted to the Department via the Major Projects website, prior to the commencement of construction, in accordance with this Condition.
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WORK AS EXECUTED PLANS

Condition 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.	<p>Work As Executed Plans will be submitted to the Planning Secretary prior to commencing operations or following the upgrades of any wind turbines or ancillary infrastructure.</p> <p>Note: The Work as Executed Plans can only be produced upon completion of construction of the development.</p>
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INCIDENT NOTIFICATION

Condition	Condition wording	Commitment to Compliance
Condition 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.	<p>If the Applicant becomes aware of an Incident, the Department will be notified in writing via the Major Projects portal as soon as practicable.</p> <p>The requirements of Appendix 9 '<i>Incident Notification and Reporting Requirements</i>' are listed at the bottom of this Table.</p> <p>An Incident is defined as: <i>An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.</i></p>

NON-COMPLIANCE NOTIFICATION

Condition 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.	<p>The Proponent will submit a written notification to the Department via the Major Projects website, within seven calendar days of becoming aware of any non-compliance.</p> <p>A non-compliance is defined as: <i>An occurrence, set of circumstances or development that is a breach of this consent.</i></p>
Condition 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.	Any non-compliance notification submitted to the Department under Condition C11 will address the requirements of Condition C12.
Condition C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance	The Proponent notes that a non-compliance does not need to be notified to the Department if it has already been notified as an Incident.

INDEPENDENT ENVIRONMENTAL AUDIT

Condition 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.	<p>Unless otherwise agreed or directed by the Planning Secretary, an Independent Environmental Audit will be conducted in accordance with the timeframes nominated in the PAR (2020), being:</p> <ul style="list-style-type: none"> • within the 12 weeks of the commencement of construction; • during construction, at intervals no greater than 6 months from the date of the initial audit; • within 6 months of commencement of operations; and <p>at intervals no greater than 3 years from the initial operational audit.</p>
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ACCESS TO INFORMATION

Condition	Condition wording	Commitment to Compliance
Condition C16	<p>The Applicant must:</p> <ul style="list-style-type: none"> d. make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> 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 xi. any other matter required by the Planning Secretary; and <p>keep this information up to date</p>	<p>The Proponent will make this information available on the website, including Management Strategies, Plans and Programs per item (iv).</p>

Appendix C Approval for staging of plans Approval for staging of plans



Planning,
Industry &
Environment

Leanne Cross
Environment Manager
CWP Renewables
PO Box 1708
Newcastle NSW 2300

15/03/2022

Dear Ms Cross

Uungula Wind Farm (SSD-6687) Staging of Strategies, Plans and Programs

I refer to your request dated 21 February 2022 advising the Department that CWP intends to develop the project in two distinct stages and seeking the Planning Secretary's approval to prepare and submit any strategy, plan or program required by the Development Consent for Uungula Wind Farm (SSD-6687) on a staged basis.

The Department notes that you intend to develop the project in two distinct stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery storage facility'
- Stage 2: Battery storage facility

The Department notes that the only strategy, plan or program not required for Stage 1 are the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39). All other strategies, plans or programs required by the Development Consent would be prepared and submitted for Stage 1 in accordance with the development consent, and then updated for Stage 2 where required.

Accordingly, under condition C3 of Schedule 3 of the Development Consent SSD-6687 the Secretary approves the submission of the relevant strategy, plan or program required by the Development Consent on a staged basis.

If you wish to discuss the matter further, please contact Natasha Homsey on 02 8275 1264 or at natasha.homsey@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'NB' followed by a flourish.

Nicole Brewer
Director
Energy Assessments

As nominee of the Secretary

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.

