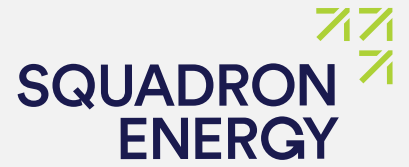


22 August 2024



Compliance Tracking Program – Boco Rock Wind Farm



Version No.: 2

Updated: 22 August 2024

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Description
1	15/07/24	Final/Issued	ZJ	CS	CS	6-monthly update of tracking program and uploaded to website
2	22/08/24	Final/Issued	ZJ	MG	ZJ	Correction of error in Condition 4.1 c) in both tables. Re-uploaded to website

Confidentiality

This document contains proprietary and confidential information, which is provided on a commercial in confidence basis. It may not be reproduced or provided in any manner to any third party without the consent of Squadron Energy Services Pty Ltd.

© Copyright Squadron Energy Services Pty Ltd 2024. This work and the information contained in it are the copyright of Squadron Energy Services Pty Ltd. No part of this document may be reprinted or reproduced without the consent of Squadron Energy Services Pty Ltd.

Disclaimer

Whilst every effort has been made to ensure the accuracy of this information, the publisher accepts no responsibility for any discrepancies and omissions that may be contained herein.

1 Condition 4.1 Requirements

The specific requirements for the Compliance Tracking Program (CTP) are described in Condition 4.1 of the NSW Approval MP 09-0103 Modification 1. These requirements and brief description of measures taken are presented in Table 1

Table 1: Condition 4.1 Compliance Tracking Requirements

Condition 4.1 Requirement	Measures taken
<p>Compliance Tracking Stage One Prior to the commencement of construction, Unless otherwise agreed by the Planning Secretary, prior to the commencement of construction of Stage One, the Proponent shall develop and implement a Compliance Tracking Program for Stage One the project, to track compliance with the requirements of this approval during the construction and operation of Stage One the project and shall include, but not necessarily limited to:</p>	<p>15/07/2024 - Compliance is tracked in accordance with a compliance spreadsheet on the project documentation management system. A compliance tracker report was approved by the Planning Secretary letter dated 3/04/2013 This Compliance tracking report is available on the website. The tracker only reports by exception (pending and non-compliant items) the Full matrix can be provided to the Department upon request.</p>
<p>a. provisions for periodic review of the compliance status of Stage One the project against the requirements of this approval, Statement of Commitments and relevant environmental approvals, licences or permits required and obtained in relation to the project;</p>	<p>The compliance matrix is reviewed on a monthly basis and a desktop audit is undertaken every 6 months.</p>
<p>b. provisions for periodic reporting of compliance status against the requirements of this approval and Statement of Commitments to the Planning Secretary Director-General including at least one month prior to the commencement of construction and operation of Stage One the project;</p>	<p>The compliance tracking report is updated and published on the project's website on a 6-monthly basis. The full matrix can be provided to the Department upon request.</p>
<p>c. a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing;</p>	<p>Pursuant to Condition 4.2 Independent Environmental Audits (IEA) are 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. An IEA was last completed in August 2023 and is available on the project website. IEA may also be completed on request of the Commonwealth Minister</p>
<p>d. procedures for rectifying any non-compliance identified during periodic reviews of compliance or environmental auditing;</p>	<p>Compliance matrix, Internal Work Instructions and environmental registers on ARCHER are used to record and rectify any non-compliances.</p>
<p>e. mechanisms for recording environmental incidents and actions taken in response to those incidents; and</p>	<p>Compliance matrix, Internal Work Instructions and environmental incident register on ARCHER are used to record and manage any incidents on site.</p>
<p>f. provisions for reporting environmental incidents to the Planning Secretary Director-General during construction and operation.</p>	<p>Compliance matrix, Internal Work Instructions and environmental registers on ARCHER are used to report accurate incidents to the Planning Secretary</p>

2 Compliance Tracking Program – Operation

Project consent for Boco Rock Wind Farm (BRWF) MP 09_0103 was determined by the Department of Planning, Housing and Infrastructure (DPHI) (the Department) on 9 August 2010, and modified by Department on 23 December 2022 (MP 09_0103 Modification 1). The original consent allowed BRWF to be constructed across two Stages. BRWF Stage One commenced operation in February 2015, and the purpose of Modification 1 was to optimise capacity and constructability of BRWF Stage Two.

In accordance with Condition 4.1 of MP 09_0103 Modification 1, this Compliance Tracking Program has been developed to track compliance with the requirements of the approval for BRWF Stage One. This compliance tracking program reports on conditions that are applicable to the operational phase of the Project and is based on a desktop review of documentation for evidence of compliance. Conditions that require site-based inspections and evidence are not in the scope of this audit. Conditions that are related to pre-construction, construction and decommissioning are not applicable to operational activities and therefore not reported. This desktop Compliance Tracking Program was updated on 15/07/2024.

Note: **Red type represents Modification 1 (09_0103-Mod-1)**. Text that has been struck out reflects the pre-Modification condition of consent.

Condition ID	Condition wording	Compliance	Finding
1.1	<p>Terms for Approval</p> <p>The proponent shall carry out the project generally in accordance with:</p> <p>The project may only be carried out:</p> <ol style="list-style-type: none"> Major Projects Application 09_0103; in compliance with the conditions of this approval Boco Rock Wind Farm Environmental Assessment prepared by Wind Prospect CWP Pty Ltd and dated November 2009; in accordance with all written directions of the Planning Secretary; Boco Rock Wind Farm Preferred Project Report and Response to Submissions prepared by Wind Prospect CWP Pty Ltd and dated May 2010; and generally in accordance with the Environmental Assessment; and the conditions of this approval generally in accordance with the Project Layout in Appendix 1. 	Compliant	<p>The Operational Environmental Management Plan (OEMP) and other management plans identify the relevant environmental and social issues applicable to the wind farm.</p> <p>Each Management plan includes a table of the conditions of consent that are applicable to the management plan.</p> <p>09/07/2024: No new directions received from Secretary during calendar year 2023</p>

Condition ID	Condition wording	Compliance	Finding
1.2	<p>In the event of an inconsistency between: If there is an inconsistency between the documents in condition 1.1, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.</p> <ul style="list-style-type: none"> a. the conditions of this approval and any document listed from condition 1.1a) and 1.1d) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b. any document listed from condition 1.1a) and 1.1d) inclusive, and any other document listed from condition 1.1a) and 1.1d) inclusive, the most recent document shall prevail to the extent of the inconsistency. 	Compliant	<p>The OEMP and other management plans identify the relevant environmental and social issues applicable to the wind farm. Each Management plan includes a table of the conditions of consent that are applicable to the management plan.</p>
1.3	<p>The proponent shall comply with any reasonable requirement(s) of the Director General arising from the Department's assessment of: The Proponent must comply with any reasonable requirement(s) of the Planning Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> a. any reports, plans or correspondence that are submitted in accordance with this approval; and any strategies, plans or correspondence that are submitted in accordance with this approval; b. the implementation of any actions or measures contained in these reports, plans or correspondence any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c. the implementation of any actions or measures contained in these documents. 	Compliant	<p>The OEMP and other management plans identify the relevant environmental and social issues applicable to the wind farm. Each Management plan includes a table of the conditions of consent that are applicable to the management plan.</p> <p>09/07/2024: No new requirements raised. Project is compliant.</p>
1.8	<p>Decommissioning</p> <p>If any wind turbine is not used for the generation of electricity for a continuous period of 12 months, it shall be decommissioned by the Proponent, unless otherwise agreed by the Director General Planning Secretary. The proponent shall keep independently-verified annual records of the use of wind turbines for electricity generation. Copies of these records shall be provided to the Director General Planning Secretary upon request. The relevant wind turbine and any associated infrastructure is to be dismantled and removed from the</p>	Not triggered	<p>12/05/2023: All turbines currently in use. 09/07/2024: All turbines are and have been in use over the previous 12 months.</p>

Condition ID	Condition wording	Compliance	Finding
	site by the Proponent within 18 months from the date that the wind turbine was last used to generate electricity.		
2.1	<p>Flora and Fauna Impacts</p> <p>Unless otherwise agreed to by the Planning Secretary Director-General, prior to the commencement of construction of the project, the Proponent shall in consultation with the BCS and DCCEEW secure a biodiversity offset package comprising a minimum of 750 hectares of Natural Temperate Grasslands, which provides suitable habitat for the Grassland Earless Dragon, Striped Legless Lizard and Little Whip Snake in perpetuity through Biobanking mechanisms to the satisfaction of the Planning Secretary Director-General. Unless otherwise agreed to by the Planning Secretary Director-General in consultation with BCS and DCCEEW, the biodiversity offset package shall include at least 150 hectares of confirmed habitat for the Grassland Earless Dragon and the Striped Legless Lizard and at least 300 hectares of confirmed habitat for the Little Whip Snake.</p>	Compliant	<p>22/02/2013: Biodiversity Conservation Science (BCS) approved the biodiversity offset package. Offset package based on land size, required minimum 750 hectares. Offset package fulfills obligation of required habitat for Grassland Earless Dragon, the Striped Legless Lizard and Little whip snake.</p> <p>Annual Active Management Reports for each biobank site (Lochlea and Weeroona) have been prepared and submitted each year to the Biodiversity Conservation Trust (BCT).</p> <p>The BCT visit the site annually.</p> <p>The next reports are due by 22 August 2024</p>
2.8	<p>Rehabilitation</p> <p>The Proponent shall implement a revegetation and rehabilitation program for all areas of the development footprint which are disturbed during the construction of the project but however, which are not required for the ongoing operation of the project including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Planning Secretary Director-General,</p> <p>a) restore native vegetation generally as identified in the EIS for all areas of rehabilitation for Stage Two; and</p> <p>b) the Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by the Planning Secretary Director-General) as being well established, in good health and self-sustaining.</p>	Compliant	<p>The Site Manager continues to monitor the condition of the rehabilitated areas, as part of his monthly site inspections. Reports sited from February 2024 to June 2024.</p> <p>Annual site inspections by the Environmental Advisor include a targeted inspection of rehabilitation/revegetation along the access track and hardstands.</p> <p>Observations from the inspections in April 2024 determined that the ground cover was good, no evidence of erosion or pooling. Landform was stabilised. Plants were well established and self-sustaining. Weeds were controlled by weed treatment and were not dominant or impacting native plant species.</p>

Condition ID	Condition wording	Compliance	Finding
2.16	<p>Vibration Impacts</p> <p>The Proponent shall ensure that the vibration resulting from construction and operation of the project does not exceed the preferred values vibration (for low probability of adverse comment) presented in Assessing Vibration: A Technical Guideline (DECC, February 2006), at any non-associated receptor / residence. sensitive receptor.</p>	Compliant	<p>09/07/2024: No vibration activities have been undertaken during current reportable period.</p> <p>Note: No impacts from vibration are expected during operations with no blasting activities required for this phase of the Project. WTG bearings will be maintained to ensure smooth and efficient operation and vibration impacts from operating wind turbines will be negligible. Vibrations caused by Site traffic and maintenance activities will be well within the Vibration Guidelines.</p>
2.17	<p>Operational Noise Criteria - Wind Turbines - Stage One</p> <p>The Proponent shall design, operate and maintain the project to ensure that the equivalent noise level from the wind turbine component of Stage One the project does not exceed the following limits at any existing non-associated sensitive sensitive receptor:</p> <ol style="list-style-type: none"> a. 35 dB(A); or b. the existing background noise level (LA90 10 minute) correlated to the integer wind speed at the turbine hub height at the wind farm site by more than 5dB(A) c. whichever is greater, for each integer wind speed (measured at hub height) from cut-in to rated power of the wind turbine generator. d. For the purpose of assessment of noise contributions specified under Conditions 2.17: e. 5 dB(A) shall be applied to measured noise levels where tonality is present. The presence of tonality shall be determined using the methodology detailed in Wind Turbine Generator Systems- Part 11: Acoustic Noise Measurement Techniques IEC 61400-11:2002 or its latest edition; and f. noise from the project shall be measured at the most affected point within the residential boundary, or at the most affected point within 20 metres of the dwelling, where the dwelling is more than 20 metres from the boundary. 	Compliant	<p>Noise assessment report provided to EPA 2014.</p> <p>No noise complaints received, or any sensitive receivers impacted during current reportable period.</p> <p>Service facility Agreement (SFA) provides Operational monthly reports (reports sited from February 2024 to June 2024) for turbine maintenance program and maintenance schedule.</p> <p>No incidents or operational failures recorded for any of the WTGs during the reporting period.</p>

Condition ID	Condition wording	Compliance	Finding
2.18	Notwithstanding conditions 2.17 of this approval, the noise limits specified under conditions 2.17 does not apply to any sensitive receptor where a noise agreement is in place between the Proponent and the respective landowner(s) in relation to noise impacts and/or noise limits. Where a noise agreement has been entered into, the noise agreements shall satisfy the requirements of Guidelines for Community Noise (WHO, 1999) and Section 2.3 of Wind Farms: Environmental Noise Guidelines (South Australian Environmental Protection Agency, 2003).	Compliant	
2.20	<p>Operational Noise Criteria - Other Facilities -Stage One</p> <p>The Proponent shall design, construct, operate and maintain the collector substation to ensure that the noise contributions from these components to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 3, at the nearest non-associated existing sensitive receptor to the substation. The maximum allowable noise contributions apply under wind speeds up to 3ms-1 (measured at 10 metres above ground level), or under temperature inversion conditions of up to 30C/100 metres and wind speeds of up to 2m/s at 10 metres above the ground.</p> <p>Table 3 - Substation Noise Criteria Day (7:00am to 6:00pm Mondays to Saturdays) : 35 Laeq(15 minute) Day (8:00am to 6:00pm Sundays and Public Holidays): 35 Laeq(15 minute) Evening (6:00pm to 10:00pm on any day) : 35 Laeq (15 minute) Night (10:00pm to 7:00am Mondays to Saturdays) : 35 Laeq(15 minute) / 45 LA1 (1 minute) Night (10:00pm to 8:00am Sundays and Public Holidays) : 35 Laeq (15 minute) / 45 LA1(1 minute)</p> <p>For the purpose of assessment of noise contributions specified under this condition, noise from these components shall be:</p> <ol style="list-style-type: none"> a. measured at the most affected point within the residential boundary or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine compliance with the LAeq 15 minute noise limits; 	Compliant	09/2015: The noise assessment report undertaken by Sonus dated September 2015 states that the noise from the substation achieves the relevant Condition of Consent at all receptors.

Condition ID	Condition wording	Compliance	Finding
	<p>b. measured at 1 metre from the dwelling facade to determine compliance with the LA1 1 minute noise limits; and</p> <p>c. subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.</p> <p>Notwithstanding, should direct measurement of noise from these components be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)). Details of such an alternative noise assessment method accepted by the EPA shall be submitted to the Planning Secretary Director-General prior to the implementation of the assessment method.</p> <p>Unless otherwise agreed to by the Planning Secretary Director-General, the modification factors presented in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), in relation to low frequency noise, only apply if the difference between the A weighted and the C weighted noise is greater than or equal to 15 dB and the measured sound pressure level is greater than Leq 65 dB(C).</p>		
2.21	The requirements of condition 2.20 do not apply if a negotiated agreement consistent with the requirements of Section 8.3 of the New South Wales Industrial Noise Policy (EPA, 2000), exists between the Proponent and the relevant non-associated sensitive receptor.	Compliant	Negotiated agreements have been obtained from neighbours for visual impacts, but none required for noise. No agreements obtained in this reporting period.
2.22	<p>Operational Noise Design Standards - Overhead Transmission Line</p> <p>The Proponent shall ensure that any overhead transmission line associated with the project is designed, constructed and operated to minimise the generation of corona and aeolian noise as far as reasonable and feasible at nearest existing non-associated receptors / residences. sensitive receptors.</p>	Compliant	No corona and aeolian noise complaints received during the current reportable period. Note: There is a short section of overhead 33 kV transmission line that connects the north eastern cluster of WTGs to the BRWF Substation (see Appendix A: Site Plan). This transmission line is located 2km from the nearest inhabited residence ('Boco') and, therefore, no corona and aeolian noise impacts are expected.
2.32	<p>Bushfire Risk</p> <p>The Proponent shall ensure that all project components on site are designed, constructed and operated to minimise ignition risks, provide for asset protection consistent with relevant RFS design</p>	Compliant	This condition has changed and has triggered an update of the Emergency Response Plan (ERP). However, no approval is required from the Department.

Condition ID	Condition wording	Compliance	Finding
	<p>guidelines (Planning for Bush fire Protection 2006 and Standards for Asset Protection Undated) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.</p> <p>The Proponent must:</p> <ul style="list-style-type: none"> a) minimise the fire risks of the project, including managing vegetation fuel loads on-site; b) ensure that the project: <ul style="list-style-type: none"> - complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; - is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road; c) develop procedures to manage potential fires on site, in consultation with the RFS; d) assist the RFS and emergency services as much as practicable if there is a fire or fire risk in the vicinity of the site; and e) notify the relevant local emergency management committee following construction of the project and prior to commencing operations for Stage Two. 		<p>The ERP includes procedures to respond to a fire and bushfire.</p> <p>The 20,000 litre tank is not required until Stage 2 is constructed.</p> <p>The ERP does not require the Department's approval.</p> <p>Revision 5 of the ERP was provided to the RFS on 14/09/2023. No comments received.</p> <p>No fires have occurred in the vicinity of the site, as of the date of this report.</p> <p>Construction of Stage 2 has not commenced, as of the date of this report.</p> <p>Modification 1 deleted Condition 2.33 which required consultation with the RFS. However, consultation with the RFS will continue on an annual basis at the beginning of the bushfire season. Next consultation event is scheduled for October 2024</p>
<p>2.35</p>	<p>Aviation Obstacles and Hazards</p> <p>Should increases to the costs of aerial agricultural spraying on any non-associated property surrounding the site be attributable to the operation of the project, the Proponent shall fully fund to the affected landowner, the cost difference between current aerial agricultural spraying and the increased cost.</p>	<p>Not triggered</p>	<p>No requests for compensation during the current reportable period</p>
<p>2.38</p>	<p>Television and Radio Interference</p> <p>In the event of a complaint regarding television/radio transmission during the operation of the project, from a non-associated receptors / residences receptor located within 5 kilometres of a wind turbine, the Proponent shall investigate the quality of transmission at the receptor / residence compared to the pre-commissioning situation and where</p>	<p>Not triggered</p>	<p>No complaints received during the current reportable period.</p> <p>Complaints register is updated monthly and available on the Project's website.</p>

Condition ID	Condition wording	Compliance	Finding
	<p>any transmission problems can be reasonably attributable to the project, rectify the problems within three months of the receipt of the complaint, through the implementation of such measures as:</p> <ul style="list-style-type: none"> a. modification to or replacement of receiving antenna; b. installation and maintenance of a parasitic antenna system; c. provision of a land line between the affected receptor / residence and an antenna located in an area of favourable reception; or d. other feasible measures. <p>If interference cannot be overcome by the measures outlined in a) to d), the Proponent shall negotiate with the impacted landowner about installing and maintaining a satellite receiving antenna. The Proponent shall be responsible for all costs associated with the mitigation measures.</p>		
2.39	<p>Radio Communication</p> <p>The Proponent shall design and construct each stage of the project in consultation with registered communications licensees (including emergency services) to ensure that risks to these services are minimised as far as reasonable and feasible. In the event that any disruptions to radio communication service links (installed before construction of that stage of the project) arise as a result of the project, the Proponent shall undertake appropriate remedial measures in consultation with the relevant licensee to rectify any issue within three months of the problem being identified. Such measures may include:</p> <ul style="list-style-type: none"> a. modification to or relocation of the existing antennae; b. installation of a directional antennae; and/ or c. installation of an amplifier to boost the signal strength. 	Not triggered	<p>Telecommunication study completed during the preparation of the EIS and includes consultation with the relevant licensees.</p> <p>No disruption to services have been reported during the reportable period.</p>
2.44	<p>Water Quality Impacts</p> <p>Except as may be expressly expressively provided by an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.</p>	Compliant	<p>No water pollution during current reportable period.</p> <p>Water management is monitored as part of monthly site inspection.</p>

Condition ID	Condition wording	Compliance	Finding
2.45B	<p>Water Supply</p> <p>The Proponent must ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of the project to match its available water supply.</p> <p>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licenses for the project.</p>	Compliant	Water source is rainwater, captured into the rainwater tank at the Operation & Maintenance (O&M) compound and treated by a filtration system at the O&M Compound.
2.51	<p>Community Contributions</p> <p>Prior to the commencement of construction of the project, the Proponent shall establish a Community Enhancement Program Fund to be jointly administered by Bombala and Cooma Monaro Shire Councils to fund community enhancement measures in the Snowy Monaro Regional Bombala and Cooma Monaro Shire local government area to offset any potential residual amenity impacts associated with the project within these local government areas. Community enhancement measures may include (but are not necessarily limited to) improvements to community infrastructure and services, sustainability initiatives and opportunities for local economic and tourist development.</p>	Compliant	12/05/2023: Community Enhancement Program Fund approved by Department of Planning and Infrastructure (DoPI) and Bombala/Cooma Monaro Councils.
	<p>The Proponent shall contribute an annual sum of \$2,500 per operational turbine to the fund, from the commencement of operation of the project until the end of its operational life.</p> <p>The Proponent must contribute to the fund an annual sum of:</p> <ul style="list-style-type: none"> - \$2,500 per operational turbine within Stage One (as shown in Appendix 1), from the commencement of operation of the project, until the end of Stage One's operational life; and - \$80,000 from the commencement of operation of any turbine within Stage Two, until the end of Stage Two's operational life. 	Compliant	07/09/2023: Community Enhancement Fund annual payment made 2023
	<p>The contribution shall be adjusted to take account of any increase in the Consumer Price Index over time, commencing at the June 2010 quarter. The terms for the administration of the funds shall be agreed between the Proponent and Bombala and Cooma-Monaro Shire Councils and submitted for the Planning Secretary Director General's approval prior to the commencement of construction.</p>	Compliant	The next community enhancement fund is scheduled for payment in September 2024.
3.3	Bird and Bat Monitoring - Stage One	Compliant	

Condition ID	Condition wording	Compliance	Finding
	<p>Prior to the commencement of construction of Stage One, the Proponent shall prepare and submit for the approval of the Planning Secretary Director-General a Bird and Bat Adaptive Management Program for Stage One, which takes account of bird/ bat monitoring methods identified in the current editions of AusWEA Best Practice Guidelines for the Implementation of Wind Energy Projects in Australia and Wind Farm and Birds: Interim Standards for Risk Assessment. The Program shall be prepared and implemented by a suitably qualified expert, approved by the Planning Secretary Director-General. The Program shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring. It shall:</p> <p>a. incorporate an ongoing role for the suitably qualified expert;</p> <p>b. set out monitoring requirements in order to assess the impact of the project on bird and bat populations, including details on survey locations, parameters to be measured, frequency of surveys and analyses and reporting. The monitoring program shall be capable of detecting any changes to the population of birds and/ or bats that can reasonably be attributed to the operation of Stage One the project, that is, data may be required to be collected prior to the commencement of construction of Stage One;</p> <p>c. incorporate a decision making framework that sets out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;</p> <p>d. identify 'at risk' bird and bat groups, seasons (such as wet seasons where bird species may be attracted to nearby wetlands) and/or areas within the project site which may attract high levels of mortality and include monthly mortality assessments and periodic local population census' and bird utilisation surveys;</p> <p>e. identify potential mitigation measures and implementation strategies in order to reduce impacts on birds and bats from</p>		<p>Bird and Bat Adaptive Management Program Version 1 (BBAMP Version 1) was approved by the Department on 15/05/2013.</p> <p>Monitoring reports have been submitted annually for the first five years of monitoring from 2015 to 2019. Annual reports were also submitted for 2020 (year 6) and 2021 (year 7).</p> <p>Pursuant to condition 4.4 c), the BBAMP was reviewed and updated in consultation with the BCS and the Department between 29/09/2023 and 24/11/2023.</p> <p>The BBAMP Version 2 was approved by the Department on 22/12/2023 and has been published on the Project's website.</p> <p>The next monitoring biennial report will cover 2022 (year 8) and 2023 (year 9) and is due for submission on 30 July 2024.</p>

Condition ID	Condition wording	Compliance	Finding
	<p>Stage One such as minimising the availability of raptor perches, swift carcass removal, pest control including rabbits, use of deterrents, and sector management including switching off turbines that are predicted to or have had an unacceptable impact on bird/ bat mortality at certain times; and</p>		
	<p>f. identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.</p>	Compliant	Section 8 of BBAMP Version 2 outlines reporting requirements, matters to be addressed and frequency.
	<p>The Reports referred to under part f) shall be submitted to the Planning Secretary Director-General on an annual basis for the first five years of operation and every two years thereafter from the commencement of operation (unless otherwise agreed to by the Planning Secretary Director-General), and shall be prepared within two months of the end of the reporting period. The Planning Secretary Director-General may, at the request of the Proponent, vary the reporting requirement or period by notice in writing to the Proponent. The Proponent may request the Planning Secretary Director-General to consider a variation to the reporting requirements at any time anytime.</p>	Pending	Annual reports have been submitted from 2015 to 2021 (year 1 to 7). The Biennial report for 2022-2023 (year 8 and 9) is due for submission by 30 July 2024.
	<p>The Proponent is required to implement reasonable and feasible mitigation measures for Stage One as identified under part e) where the need for further action is identified through the Bird and Bat Adaptive Management Program for Stage one, or as otherwise agreed with the Planning Secretary Director-General.</p>	Compliant	No trigger events occurred in the current reportable period.
4.1	<p>Compliance Tracking Stage One Prior to the commencement of construction, Unless otherwise agreed by the Planning Secretary, prior to the commencement of construction of Stage One, the Proponent shall develop and implement a Compliance Tracking Program for Stage One the project, to track compliance with the requirements of this approval during the construction and operation of Stage One the project and shall include, but not necessarily limited to:</p>	Compliant	<p>27/07/2022: Compliance is tracked in accordance with a compliance spreadsheet on the project documentation management system. A compliance tracker report was approved by the Planning Secretary letter dated 3/04/2013 This Compliance tracking report is available on the website. The tracker only reports by exception (pending and non-compliant items) the Full matrix can be provided to the Department upon request.</p>

Condition ID	Condition wording	Compliance	Finding
	a. provisions for periodic review of the compliance status of the project Stage One against the requirements of this approval, Statement of Commitments and relevant environmental approvals, licences or permits required and obtained in relation to the project;		The compliance matrix is reviewed on a monthly basis and a desktop compliance audit is undertaken every 6 months.
	b. provisions for periodic reporting of compliance status against the requirements of this approval and Statement of Commitments to the Director-General Planning Secretary including at least one month prior to the commencement of construction and operation of the project Stage One ;		The compliance tracking report is updated and published on the project's website on a 6-monthly basis. The full matrix can be provided to the Department upon request.
	c. a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 – Guidelines for Quality and/or Environmental Management Systems Auditing;		Pursuant to Condition 4.2 Independent Environmental Audits (IEA) are 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. An IEA was last completed in August 2023 and is available on the project website. IEA may also be completed on request of the Commonwealth Minister
	d. procedures for rectifying any non-compliance identified during periodic reviews of compliance or environmental auditing;		Compliance matrix, Internal Work Instructions and environmental registers on ARCHER are used to record and rectify any non-compliances.
	e. mechanisms for recording environmental incidents and actions taken in response to those incidents; and		Compliance matrix, Internal Work Instructions and environmental incident register on ARCHER are used to record and manage any incidents on site.
	f. provisions for reporting environmental incidents to the Director-General Planning Secretary during construction and operation.		Compliance matrix, Internal Work Instructions and environmental registers on ARCHER are used to report accurate incidents to the Planning Secretary
4.2	Independent Environmental Audit Independent Audits of Stage One and Stage Two 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.	Compliant	This is a new condition SNC Lavalin was endorsed by the Department on 05/04/2023.

Condition ID	Condition wording	Compliance	Finding
			<p>The Independent Environmental (EIA) commenced on 22/08/2023 and Audit report with submissions response provided to the Department on 13/10/2023.</p> <p>The Department responded with no comments. Audit report and letter published on website. 16/10/2023.</p>
<p>4.3</p>	<p>Revising, Staging, Combining and Updating Strategies, Plans or Programs The Proponent must: a) update the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and b) review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 months of the: c) submission of an incident report under condition 4.12; d) submission of an audit report under condition 4.2; or e) any modification to the conditions of this approval.</p>	<p>Compliant</p>	<p>This is a new condition</p> <p>Pursuant to item c) ‘incident report’ and d) ‘audit report’ of this condition:</p> <p>a) Following an incident that occurred on 07/10/2023 and the completion of the Independent Environmental Audit (EIA) and submission of the IEA report to the Department on 13/10/2023, a review of the relevant strategies and plans was completed between 17/10/2023 and 25/10/2023, and it was determined that revisions were not required.</p> <p>Historic Non-Compliance - Closed</p> <p>Pursuant to item e) ‘modification of this condition’, the modification obtained in 23/12/2022 triggered a review of the strategies, plans and programs that are relevant to the operational status of BRWF Stage One. These plans are: OEMP and BBAMP.</p> <p>An Administrative update of the BBAMP was submitted on 25/05/2023. The Department approved this version of the BBAMP on 05/10/2023.</p> <p>The OEMP was reviewed and the updated Version F was submitted on 25/04/2023. The Department requested additional information on 22/03/2024. SQE addressed the requests on 02/04/2024 and is waiting to receive feedback or approval from the Department.</p> <p>A notification of non compliance was provided to the Department on 24/05/2023, since the updated BBAMP and OEMP were not submitted within 3 months of the modification. On 07/06/2023 the Department assessed the non-compliance with the Approval in accordance with its</p>

Condition ID	Condition wording	Compliance	Finding
			Compliance Policy and determined on this occasion to record the breach with no further action.
4.4	<p>With the approval of the Planning Secretary, the Proponent may:</p> <p>a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the project 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);</p> <p>b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the project).</p>	Compliant	<p>BBAMP Version 1 was approved by the Department on 15/05/2013.</p> <p>Pursuant to condition 4.4 c), the BBAMP was reviewed and updated in consultation with the BCS and the Department between 29/09/2023 and 24/11/2023.</p> <p>The BBAMP Version 2 was approved by the Department on 22/12/2023 and has been published on the Project's website.</p> <p>Current OEMP Version E was approved by the Department on 21/11/2014.</p> <p>The OEMP was reviewed and revised pursuant to Conditions 4.3 e) and 4.4c); and Version F was submitted to the Department on 25/04/2023. The Department requested additional information on 22/03/2024. SQE addressed the requests on 02/04/2024 and is waiting to receive feedback or approval from the Department.</p>
4.5	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 approval.	Not triggered	No plans updated in the current reporting period
4.7	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.	Compliant	<p>Current plans have been prepared and approved for Stage 1 only.</p> <p>Stage 2 has not been built</p>
4.8	A strategy, plan or program that was prepared for a stage of the project and approved in accordance with this approval, prior to the date of commencement of Modification 1, will not be combined with, updated or superseded by any strategy, plan or program prepared and approved after the commencement of Modification 1 unless the combining, updating or superseding is expressly provided for by the Proponent in the subsequent strategy, plan or program.	Not triggered	Stage 2 has not been built. No plans for Stage 2 have been developed and none of the plans for Stage 1 are proposed to be combined with any future plans for Stage 2.
4.9	Notifications Notification of Department	Not triggered	No upgrades or decommissioning of Stage 1 occurred during this reporting period.

Condition ID	Condition wording	Compliance	Finding
	<p>Prior to commencing the:</p> <p>a) upgrading or decommissioning of Stage One or the cessation of operations of Stage One; and</p> <p>b) construction, operations, upgrading or decommissioning of Stage Two or the cessation of operations of Stage Two, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.</p> <p>If any of these phases of the project are to be staged, then the Proponent 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.</p>		Construction of Stage 2 did not commence in this reporting period.
4.12	<p>Incident Notification</p> <p>The Department must be notified in writing via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the project (including the development application number and the name of the project if it has one), and set out the location and nature of the incident.</p> <p>Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.</p>	Not triggered	No incidents occurred during the reportable period
4.13	<p>Non-Compliance Notification</p> <p>The Department must be notified via the Major Projects website within 7 days after the Proponent becomes aware of any non-compliance with the conditions of this approval.</p>		
4.14	<p>A non-compliance notification must identify the development and the application number for it, set out the condition of approval 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.</p>		
4.15	<p>A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.</p>		
5.1	Community information	Compliant	The documents listed in Condition 5.1 are available on the public website.

Condition ID	Condition wording	Compliance	Finding
	<p>Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.</p> <p>The Proponent must:</p> <p>a) make the following information publicly available on its website as relevant to the stage of the project:</p> <ul style="list-style-type: none"> • the Environmental Assessment; • the final layout plans for the project; • current statutory approvals for the project; • approved strategies, plans or programs required under the conditions of this approval; • the proposed staging plans for the project if the construction, operation or decommissioning of the project is to be staged; • a comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; • how complaints about the project can be made; • a complaints register, which is to be updated on a monthly basis; • minutes of CCC meetings; • the annual Statement of Compliance with the EPL; • the results of the compliance tracking program; • any independent environmental audit, and the Proponent's response to the recommendations in any audit; and • any other matter required by the Planning Secretary; and <p>b) keep this information up to date.</p>		
5.3	<p>Complaints Procedure</p> <p>Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation):</p> <p>a. a 24 hour telephone number on which complaints about construction and operational activities at the site may be registered;</p> <p>b. a postal address to which written complaints may be sent; and</p>	Compliant	<p>10/07/2024: 24hr phone number available on website and advertised; 1300 855 985</p> <p>10/07/2024: Postal address on website, Canberra Office.</p>

Condition ID	Condition wording	Compliance	Finding
	<p>c. an email address to which electronic complaints may be transmitted.</p> <p>The telephone number, the postal address and the e-mail address shall be advertised in a newspaper circulating in the locality on at least six monthly intervals during construction and at least yearly intervals during the operation of the project. These details shall also be provided on the Proponent's website internet site. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public.</p>		<p>10/07/2024: Required information available on website info@bocorockwindfarm.com.au</p> <p>10/07/2024: Website verified with information described in this condition. 23/04/2024: site visit confirmed information on public sign is up to date and meets this condition.</p>
5.4	<p>The Proponent shall record details of all complaints received through the means listed under condition 5.3 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to:</p> <p>a. the date and time, where relevant, of the complaint; details of the complaint (such as date, time and how the complaint was made);</p> <p>b. the means by which the complaint was made (telephone, mail or email); the nature of the complaint;</p> <p>c. the nature of the complaint; any action(s) taken by the Proponent in relation to the complaint; and</p> <p>d. any action(s) taken by the Proponent in relation to the complaint, including timeframes for implementing the action and timeframe for getting back to the complainant with an interim or final response regarding actions taken or proposed to be taken to address the issues raised; and if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</p> <p>The Complaints Register shall be made available for inspection by the Director General upon request. The Complaints Register must be kept up-to-date on the Proponent's website, in accordance with condition 5.1 b), above.</p>	Compliant	<p>Complaint register created covering 2018 to present. Register uploaded to website and updated monthly</p> <p>Complaint Register has not been requested during the reportable period.</p> <p>No complaints during the reportable period.</p>

Condition ID	Condition wording	Compliance	Finding
5.5	<p>Community Information Plan</p> <p>Prior to the commencement of construction of each stage of the project, the Proponent shall prepare a Community Information Plan which outlines the approach to consultation with measures for disseminating information on the development status of the project and methods for actively engaging with surrounding landowners and members of the community regarding issues that would be of interest/ concern to them during the construction and operation of the project. This may include distribution of community newsletters, stakeholder meetings and opportunities for site visits. The Plan shall include but not be limited to:</p> <ul style="list-style-type: none"> a. procedures to inform the local community of planned construction activities including construction traffic routes, potential traffic disruptions, high noise generating activities and works outside of normal construction hours; b. procedures to inform and consult with landowners regarding landscaping measures at their properties in accordance with condition 2.23 of this approval; c. procedures to inform and consult with landowners regarding the outcomes of noise monitoring undertaken at their properties in accordance with condition 6.4 of this approval for Stage One 3.1 of this approval; d. procedures to inform and consult with landowners regarding the outcomes of compliance reviews and audits of the project; and e. measures outlined in conditions 5.1, 5.3 and 5.4 5.1 to 5.4. 	Compliant	<p>24 /08/ 2012: A Community Information Plan (CIP) was prepared for construction The CIP for the operations phase is included as Chapter 11 of the OEMP version E and provided on BRWF website.</p>
	<p>The Plan shall be submitted for the approval of the Planning Secretary Director-General no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Planning Secretary Director-General. Construction works shall not commence until written approval has been received from the Planning Secretary Director-General.</p>	Compliant	<p>13/04/2013: Letter of approval from the Department</p>
6.4	Operation Environmental Management Plan	Compliant	

Condition ID	Condition wording	Compliance	Finding
	<p>The Proponent shall prepare and implement an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during operation of the project. The Plan shall be consistent with Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a. a description of key operational and maintenance activities associated with the project; b. identification of all statutory and other obligations that the Proponent is required to fulfil in relation to operation of the project, including all approvals, licences, approvals and consultations; c. a description of the roles and responsibilities for all relevant employees involved in the construction of the project including relevant training and induction provisions for ensuring that all employees, contractors and sub-contractors are aware of their environmental and compliance obligations under these conditions of approval; d. overall environmental policies and principles to be applied to the operation of the project; e. an environmental risk analysis to identify the key environmental performance issues associated with the construction phase and details of how environmental performance would be monitored and managed to meet acceptable outcomes including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> (i) measures to monitor and manage noise emissions including: <ul style="list-style-type: none"> - measures to be undertaken to rectify annoying characteristics resulting from the operation of the project such as but not limited to adverse mechanical noise from component failure, - measures for regular performance monitoring of noise generated by the project (in addition to measured identified 		<p>Current approved OEMP is Version E, dated 27/11/2014. This OEMP (Version E) is available on the project website. This OEMP was reviewed and the updated Version F was submitted on 25/04/2023. The Department requested additional information on 22/03/2024. SQE addressed the requests on 02/04/2024 and is waiting to receive feedback or approval from the Department.</p> <p>A separate OEMP will be prepared for Stage Two prior to the commencement of operation of that Stage.</p>

Condition ID	Condition wording	Compliance	Finding
	<p>in conditions 3.1 and 3.2), and - measures to proactively respond to and deal with noise complaints; (i)(a) details of noise mitigation measures (such as sector management or on-curtilage noise treatments) that would be used to ensure that operational noise criteria are not exceeded; (ii) measures to monitor and manage visual impacts in accordance with the requirements of this approval including maintenance requirements for landscaping measures implemented in relation to the project; (iii) measures to monitor and manage flora and fauna impacts including adaptive bird and bat management in accordance with the requirements of this approval and measures for the monitoring and maintenance of revegetated areas on site (including associated weed management) consistent with the requirements of conditions 2.7 and 2.8; (iv) measures to monitor and manage dust emissions (including dust generated by traffic on unsealed internal access tracks); (v) measures to monitor and manage operational traffic impacts particularly during maintenance events where operational traffic volumes associated with the project may increase and procedures for restoring any damage attributable to the project during the operation phase; (vi) emergency management measures including measures to control bushfires;</p> <p>f. procedures for the periodic review and update of the Operation Environmental Management Plan as necessary.</p> <p>The Plan shall be submitted for the approval of the Planning Secretary Director-General no later than one month prior to the commencement of each stage of Operation of the project or within such period as otherwise agreed by the Planning Secretary Director-General. Operation of each stage shall not commence until written approval has been received from the Planning Secretary Director-General.</p>		

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.

