

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

# Crookwell 2 Wind Farm (DA-176-8-2004-I) DPE Independent Compliance Audit

June 2022

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Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

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Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

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*The findings and opinions in this report are based on research undertaken by Patric Millar BSc, ME, Dip Man, Dip SIS, Certified Environmental Practitioner, Certified Professional in Erosion and Sediment Control, MEIANZ, MEICA, ARLF, of Ecosite Solutions Pty Ltd, independent consultants, and do not purport to be those of the client.*

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

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Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## Contents

<b>1</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>3</b>
<b>2</b>	<b>INTRODUCTION .....</b>	<b>4</b>
2.1	BACKGROUND OF PROJECT .....	4
2.2	AUDIT TEAM .....	4
2.3	AUDIT OBJECTIVES.....	5
2.4	AUDIT SCOPE .....	5
2.5	PERIOD COVERED BY AUDIT.....	7
2.6	LIMITATIONS.....	7
<b>3</b>	<b>AUDIT METHODOLOGY .....</b>	<b>8</b>
3.1	APPROVAL OF AUDIT TEAM.....	8
3.2	DEVELOPMENT OF AUDIT SCOPE .....	8
3.3	SUMMARY OF AUDIT PROCESSES .....	8
3.4	SITE INSPECTION.....	9
3.4.1	Access Points .....	9
3.4.2	Visual Screening .....	9
3.4.3	Site Revegetation .....	9
3.4.4	Access Roads .....	9
3.4.5	Turbine Colour.....	9
3.4.6	Chemical Storage.....	9
3.4.7	Spill Management .....	9
3.4.8	Site Cleanliness.....	10
3.5	CONSULTATION .....	10
3.6	COMPLIANCE DESCRIPTORS .....	12
<b>4</b>	<b>AUDIT FINDINGS .....</b>	<b>13</b>
4.1	APPROVALS AND DOCUMENTS .....	13
4.2	ASSESSMENT OF COMPLIANCE.....	13
4.3	NON-COMPLIANCES AGAINST CONDITIONS OF CONSENT .....	13
4.4	REVIEW OF MANAGEMENT PLANS.....	21
4.5	NON-COMPLIANCES AGAINST MANAGEMENT PLANS .....	21

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

4.6	COMPLIANCE OF ACTUAL AND PREDICTED IMPACTS.....	21
4.7	NON-COMPLIANCES OF ACTUAL AND PREDICTED IMPACTS.....	22
4.8	PENALTY NOTICES.....	22
4.9	PREVIOUS AUDIT ACTIONS .....	22
4.10	MATTERS CONSIDERED RELEVANT BY AUDITOR OR DPE .....	22
4.11	COMPLAINTS .....	23
4.12	INCIDENTS .....	23
4.13	EVIDENCE COLLECTED .....	23
4.14	OPPORTUNITIES.....	24
<b>5</b>	<b>NON-COMPLIANCES AND RECOMMENDATIONS.....</b>	<b>25</b>
5.1	NON-COMPLIANCES AND RECOMMENDATIONS .....	25
5.2	POST AUDIT COMPLIANCE ACTION .....	27
5.3	EFFECTIVENESS OF EIS MITIGATION STRATEGIES.....	28
5.4	RECOMMENDATIONS FOR UPDATING OF OEMP AND SUB PLANS.....	28
	<b>APPENDIX A PLANNING SECRETARY AUDIT TEAM AGREEMENT.....</b>	<b>30</b>
	<b>APPENDIX B SITE INSPECTION PHOTOGRAPHS .....</b>	<b>34</b>
	<b>APPENDIX C DOCUMENT REVIEW LIST .....</b>	<b>39</b>
	<b>APPENDIX D INDEPENDENT AUDIT TABLE .....</b>	<b>41</b>

### List of Tables

Table 1	Audit team.....	4
Table 2	Consultation Summary.....	10
Table 3	Compliance Descriptors .....	12
Table 4	Non – Compliance against Conditions of Consent.....	14
Table 5	DPIE Considerations .....	23
Table 6	DPIE Non – Compliances and Recommendations.....	25
Table 7	Post Audit Compliance .....	27

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 1 EXECUTIVE SUMMARY

Ecosite Solutions Pty Ltd has been engaged by Global Power Generation Australia Pty Ltd (GPG) to undertake an independent audit of the operation of the Crookwell Two Windfarm (C2WF). The project was approved on 5<sup>th</sup> June 2005 with DA-176-8-2004-I, it was modified (Mod 1) on 29<sup>th</sup> June 2009 and again (Mod 2) on 2<sup>nd</sup> October 2017.

The Project consists of 28 General Electric wind turbines with a hub height of 93 metres, a rotor diameter of 130 metres, roads, hardstand, internal powerlines and a switchyard. The total generation capacity of C2WF 91 MW. This operational audit was undertaken pursuant to the requirements of Condition 25 Environmental Impact Audit Report and focused on the conditions of approval that relate to the operational phase.

To complete this audit, Ecosite Solutions undertook a site inspection, interviewed key management staff/ supervisory personnel, observed tasks performed in the field and reviewed relevant and available documents relating to the approval and to the ongoing management and monitoring of the site environmental aspects.

The inspection was undertaken on 12<sup>th</sup> May 2022, with members of Global Power Generation Australia present. At the time of the audit, the site was fully operational.

At the time of the audit there were nine non – compliances against the Conditions of Consent, its sub plans and Environmental Impact Statement (EIS) commitments. One of the non – compliances was of a physical nature and related to not replanting certain trees. The remainder of the non – compliances are of an administrative nature. The non – compliances have not resulted in any adverse environmental impacts.

Since the audit GPG have undertaken several remedial measures to address the observed non – conformance. These are detailed in Table 7.

The EIS predicted a number of environmental impacts and proposed a range of mitigation measures to minimise their impact. The overall standard of environmental controls was deemed high and appeared to be well planned and implemented. Overall, the predicted environmental impacts have been managed by the mitigation measures proposed in the EIS.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 2 INTRODUCTION

### 2.1 BACKGROUND OF PROJECT

The Crookwell 2 Wind Farm site is located in the NSW Southern Tablelands region approximately 14 km south-east of Crookwell township, 30 km north-west of Goulburn, and 90 km north-east of Canberra, within the Upper Lachlan Shire Council Local Government Area. The Wind Farm began operations in December 2018.

The project covers an area of approximately 2,088 ha, it situated south of the existing Crookwell 1 Wind Farm and to the west and north of the Crookwell 3 Wind Farm sites. The current land use of the project is primarily agricultural activities including grazing of sheep and cattle.

The Crookwell 2 Wind Farm was granted development consent by the Minister for Planning in 2005 for up to 46 wind turbines and associated infrastructure DA-176-8-2004-I. In 2009 the development consent was amended to increase the size of the turbines (Mod-1). In 2016 Crookwell Development Pty Ltd lodged an amendment application (Mod-2) to increase the size of the turbines to a tip height of 160 metres, a hub height of 95 metres and a rotor diameter of 130 metres, the number of turbines was reduced to a maximum of 32. The Mod-2 application was approved by Department of Planning and Environment on 31<sup>st</sup> October 2017.

The project connects to the TransGrid 330 kV Transmission Line system through a substation and switchyard.

### 2.2 AUDIT TEAM

Ecosite Solutions Pty Ltd was appointed to undertake as an Independent Environmental Auditor for the Project. The appointment of the Ecosite Solutions Pty Ltd audit team received endorsement from the Secretary of the Department of Planning and Environment (DPE) in their letters dated 8<sup>th</sup> February 2022 and 20<sup>th</sup> April 2022 a copy is in Appendix A. The Environmental Impact Audit Report – Operation which was undertaken on 12<sup>th</sup> May 2022. undertake the ongoing construction audit in their letter dated 29 June 2020 (Appendix A).

The Ecosite Solutions audit team is described in Table 1 below.

Table 1 Audit team

Role	Name	Qualifications
Lead Auditor	Patric Millar	Environmental Systems Lead Auditor, SAI Global Master of Engineering BSc
Audit Assistant	Richard Peterson	Environmental Systems Auditor, SAI Global Master of Environmental Management BEng



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 2.3 AUDIT OBJECTIVES

The objective of the audit was to comply with Condition 25 of DA-176-8-2004-I which states:

### **25 Environmental Impact Audit Report - Operation**

An Environmental Impact Audit Report - Operation must be prepared and submitted to the Secretary within three (3) months after a 24 month period of operation and then at any additional periods requested by the Secretary. If requested, the Environmental Impact Audit Report – Operation must be provided to other relevant Government Agencies and Council.

The Environmental Impact Audit Report - Operation must:

- (a) be certified by an independent person at the Applicant’s expense. The certifier must be approved by the Secretary prior to the preparation of the Environmental Impact Audit Report – Operation;
- (b) compare the operation impact predictions made in the EIS and documents identified in Condition 2;
- (c) assess the effectiveness of implemented mitigation measures and safeguards;
- (d) assess compliance with the systems for operation maintenance and monitoring; and
- (e) discuss the results of consultation with the local community particularly any feedback or complaints.

The result of the Audit Report must also be used to update the OEMP where necessary. The need or otherwise to update the OEMP must be certified by the Environmental Representative. The Applicant must notify the Secretary, relevant Government Agencies and Council of any updates to the OEMP and provide a copy on request.

## 2.4 AUDIT SCOPE

In addition to the requirements of Condition 25 of DA-176-8-2004-i the audit assessed compliance against the documents as outlined in Condition 2 of DA-176-8-2004-I which states:

2 The Applicant must carry out the development generally in accordance with the following documents:

Development Application No. DA-176-8-2004-i; lodged with the Department of Infrastructure, Planning and Natural Resources on 2 August 2004;

- (a) Crookwell II Wind Farm Environmental Impact Statement (three volumes) prepared by URS, dated July 2004
- (b) Proposed Crookwell II Wind Farm: Response to Department’s Questions, URS, dated 25 October 2004;
- (c) Crookwell II NIA Response to EPA Queries, Richard Heggie Associates, dated 1 September 2004;

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

- (d) Crookwell II Response to EPA Queries and Concawe Verification Study, Richard Heggie Associates, dated 10 September 2004;
- (e) Crookwell II NIA – Follow Up Response to EPA Queries, Richard Heggie Associates, 22 September 2004;
- (f) Email and documentation from TME Australia, entitled Location A – Pejar Park Noise Acceptability Assessment Noise Agreement Turbines Removed, and Location M – Normaroo, Noise Acceptability Assessment Noise Agreement Turbines Removed, dated 5 January 2005;
- (g) Crookwell II Wind Farm Additional Raptor Survey Assessment, URS, 12 November 2004;
- (h) Crookwell II Wind Farm 8 Part Test – Swift Parrot (*Iathamus discolor*), URS, 15 November 2004;
- (i) Crookwell II Wind Farm Spring Reptiles Survey, URS, 22 December 2004;
- (j) Results of an Early Summer Survey for Bats at the Proposed Crookwell 2 Wind Farm, Crookwell, NSW, Glen Hoye, Fly By Night Bat Surveys Pty Ltd, January 2005;
- (k) Memorandum from URS to Gamesa Energy Australia, Crookwell II Wind Farm Shadow Flicker Assessment, dated 16 December 2004;
- (l) Email from Gamesa Energy Australia to the Department entitled Fire Risk Issues – Crookwell II, dated 22 December 2004;
- (m) Memorandum from URS to Gamesa Energy Australia entitled Crookwell II – Aerial Spraying, dated 15 February 2005;
- (n) Crookwell 2 Site Map, Revision 1, dated 03/03/05 by TME Australia Pty Ltd;
- (o) Modification Application 176-8-2004-MOD1 including Crookwell II Wind Farm Part 1 – Statement of Environmental Effects and Crookwell II Wind Farm Part 2 – Appendices prepared by Tract Consultants, dated January 2009 and Response to Submissions Received prepared by Tract Consultants, dated April 2009;
- (p) Application to modify the development consent (Mod 2), including the Environmental Assessment prepared by Mecone and dated September 2016, and the associated
- (q) Response to Submissions, dated June 2017; and
- (r) Conditions of this Consent.

If there is any inconsistency between the Conditions of this Consent and a document listed above, the Conditions of this Consent must prevail to the extent of the inconsistency. If there is any inconsistency between documents listed above (other than the Conditions of this Consent) then the most recent document must prevail to the extent of the inconsistency.

2A The Applicant must comply with any reasonable requirement(s) of the Secretary arising from the Department’s assessment of:

- (a) any strategies, plans, programs, reviews, audits, reports 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.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 2.5 PERIOD COVERED BY AUDIT

The audit covers the period from the commencement of operations. The requirement for an audit to be undertaken within three months after a 24 month period of operations as specified in Condition 25. This timing was not achieved due to the restrictions relating to travel and site access because of the COVID 19 outbreak in 2020. The audit was undertaken on 12<sup>th</sup> May 2022.

## 2.6 LIMITATIONS

This disclaimer, together with any limitations specified in the report, applies to this report and its use.

This report was prepared in accordance with the contracted scope of services for the specific purpose stated and subject to the applicable cost, time and other constraints. In preparing this report, Ecosite Solutions Pty Ltd:

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Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

### 3 AUDIT METHODOLOGY

#### 3.1 APPROVAL OF AUDIT TEAM

The audit team was approved by the Secretary of DPE in their letters dated 8th February 2022 and 20th April 2022. These are provided in Appendix A.

#### 3.2 DEVELOPMENT OF AUDIT SCOPE

The audit applied to the entire site and was carried out in general accordance with AS/NZS ISO 19011:2011: Guidelines for quality and/or environmental management systems auditing. The scope of the audit included:

- document review and an assessment of compliance with the Conditions of Consent (DA-176-8-2004), EPL 20911, and a comparison of the operational impact predictions made in the EIS dated 2004
- review of selected and relevant supporting plans developed as required by the Conditions of Consent and assessment of their implementation and adequacy towards effective environmental performance, including Operational Environmental Management Plan (OEMP);
- site inspection to assess the effectiveness of field implementation of the selected plans and whether the controls installed on site comply with the Conditions of Consent and
- audit reporting, focussing on:
  - brief general description of the site and its current status;
  - an overview of the key issues at the site including the environmental controls;
  - exception tables describing any non-compliances with the Conditions of Consent, EPL and EIS approval and implementation clauses from the selected management plans reviewed as part of the audit; and
  - detailed review of the key requirements within strategies, plans and programs, and provide an assessment of compliance with these.
  - Where actions had been previously assessed by a statutory authority, Ecosite Solutions relied on the findings of the authority and did not reassess the relevant sections of the condition.

#### 3.3 SUMMARY OF AUDIT PROCESSES

To complete the audit the following was undertaken:

- Preliminary document review to familiarise the team with the project and their processes
- Opening meeting
- Site visit
- Interviews with key management and supervisory personnel
- Review of documents and records on-site
- Closing meeting

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

- Follow up of residual matters

### 3.4 SITE INSPECTION

A site inspection was undertaken on 12<sup>th</sup> May 2022 by Richard Peterson representing Ecosite Solutions Pty Ltd and Adrian Ogilvie and Graham Young of Global Power Generation Australia Pty Ltd. The site visit was undertaken during the morning and afternoon. The weather was overcast and raining. During the site inspection and document review environmental controls on-site, that were observed these are detailed below. Photographs of the key aspects of the site are contained in Appendix B.

#### 3.4.1 Access Points

The three site access points were inspected and were appropriately sealed with grid and gates installed. Suitable turn in setbacks were observed.

#### 3.4.2 Visual Screening

Evidence of visual screening plantings were observed. This included plantings on Crookwell to Goulburn Road (observed opposite the Lookout). These trees were replanted in 2021 due to varied survival rate. Some areas were not planted due to the non – availability of poplars due to the drought. Some areas of visual screening had not been planted or the plantings were not successful. The main example is the area adjacent to the substation on Prell’s Property.

#### 3.4.3 Site Revegetation

The site revegetation was well established and was providing effective erosion and sediment control through groundcover.

#### 3.4.4 Access Roads

Access roads were graded with no observed wheel rutting. Permanent drainage consisting of rock lined drains were observed in areas of steep slopes and high scour potential.

#### 3.4.5 Turbine Colour

Wind turbines were observed to be off-white in compliance with the Conditions of Consent

#### 3.4.6 Chemical Storage

Minimal quantities of chemicals stored on site and were placed in a bunded, covered and ventilated container.

#### 3.4.7 Spill Management

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Fully stocked spill kits were available adjacent to the point of use along with material data sheets.

### 3.4.8 Site Cleanliness

There was no observed evidence of fuel or oil spills, the project sites were observed to be free of rubbish, waste materials, stockpiles soil and weeds.

## 3.5 CONSULTATION

Prior to undertaking the Audit, the Lead Auditor consulted with agencies and individuals identified in Table 2 Consultation.

Table 2 Consultation Summary

Agency / Individual Consulted	Date Consulted	Date of response	Issues Raised
Department of Planning, Industry and Environment	24/02/2022	24/02/22	<ul style="list-style-type: none"> <li>• Compliance with layout plans etc,</li> <li>• CC and OCs obtained</li> <li>• VPA status</li> <li>• Monitoring records</li> <li>• OEMP compliance</li> <li>• Community information plan (CIP) implementation and monitoring</li> <li>• Visual management / progress with landholders if applicable</li> <li>• Landscape management plan progress and monitoring</li> <li>• Roadside landscape mgt plan progress, mgt and monitoring</li> <li>• Noise monitoring and compliance with criteria</li> <li>• Rehabilitation progress of crown roads</li> <li>• Roads all upgraded completed to the satisfaction of roads authority (all roads including</li> <li>• Status of Road safety assessment and changes</li> <li>• Management / protection of heritage items</li> <li>• Management / of flora and fauna (particular bird and bat monitoring and management)</li> <li>• Status of safety management system</li> </ul>

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Agency / Individual Consulted	Date Consulted	Date of response	Issues Raised
			<ul style="list-style-type: none"> <li>• Rehabilitation on site</li> <li>• Weed management on site</li> <li>• Erosion and sediment control and management onsite.</li> <li>• Compliant register and community engagement management</li> <li>• Actions status form construction audit</li> </ul>
Environmental Protection Authority	03/03/2022	17/03/2022	<p>The EPA regulates activities associated with the construction and operation of the project in accordance with the conditions of Environment Protection Licence No. 20911 issued to Crookwell Development Pty Ltd. The EPA has its own audit process, regulatory mechanisms and inspection programs to monitor compliance with the licence.</p> <p>The licence references a meteorological mask which should have been installed so a check to ensure weather data is being monitored would be worthwhile. Given construction is now complete, the EPA does not have any specific requirements to add to those that you will already identified that will be assessed. I can also confirm the EPA has not received any recent complaints.</p>
Biodiversity Conservation Division	03/03/2022	03/03/2022	<p>Informed that the Senior Team Leader Planning would contact me with their requirements for biodiversity management.</p> <p>No additional response was received</p>
Transport for NSW	03/03/2022		Nil Response
Upper Lachlan Shire Council	14/03/2022		Nil Response
David Bone Environmental; Representative	14/03/2022 (phone) 03/05/02022		Nil Response

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

### 3.6 COMPLIANCE DESCRIPTORS

The compliance status of each condition was determined using the relevant descriptors in Table 3.

Table 3 Compliance Descriptors

Compliance Status	Description
Compliant (C)	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been completed
Non- Compliant (NC)	One or more specific elements of the conditions or requirements have not been complied with within the scope of the audit
Not Triggered (NT)	A requirement has an activation or timing trigger that has not been met at the time when the audit was undertaken



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 4 AUDIT FINDINGS

### 4.1 APPROVALS AND DOCUMENTS

The following approval documents were reviewed:

- Conditions of Consent DA-176-8-2004
- Documents specifically listed in Condition of Consent Number 2 of DA-176-8-2004
- Conditions of Approval EPL20911

### 4.2 ASSESSMENT OF COMPLIANCE

The Planning Consent contains 112 separate conditions. Of these there are 28 Conditions which relate either directly or indirectly to the operation of the wind farm. These Project was audited against these conditions and there was generally a high degree of compliance. A breakdown of the compliance is shown in Appendix C.

In addition to the audit against the Conditions of Consent an audit was undertaken against Table 6 of the Operational Environmental Management Plan (OEMP). The Project was generally compliant with the obligations of the OEMP and its sub plans. A breakdown of the compliance is shown in Appendix C.

There are twelve sections within the Environmental Impact Statement (EIS) which made environmental commitments along with proposed mitigation measures. Condition 25 of the Conditions of Consent required an assessment on the effectiveness of the mitigation strategies proposed EIS. A breakdown of the compliance is shown in Appendix C.

The EIS was released in 2004 and reflects its age and understanding of the operational impacts of a modern wind farm. A number of the mitigation measures proposed in the EIS may have represented best management at the time of writing are now considered business as usual and are not specifically identified.

### 4.3 NON-COMPLIANCES AGAINST CONDITIONS OF CONSENT

There were nine non-compliances against the Conditions of Consent which are outlined in Table 4 Compliance with Conditions of Consent

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Table 4 Non – Compliance against Conditions of Consent

Condition of Consent	Item	Description	Non-Compliance
27	Operation Environmental Management Plan	<p>The Applicant must prepare and implement an Operation Environmental Management Plan (OEMP) to detail an environmental management framework, practices and procedures to be followed during the operation of the development. The Plan must include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;</li> <li>(b) a description of the roles and responsibilities for all relevant employees involved in the operation of the development;</li> <li>(c) overall environmental policies and principles to be applied to the operation of the development;</li> <li>(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved;</li> <li>(e) management policies to ensure that environmental performance goals are met and to comply with the Conditions of Consent; and (f) the Management Plans required to be included in the OEMP as specified in the Conditions of Consent.</li> </ul>	<p>The Annual Return for the Environmental Protection License 20911 has not been submitted since the commencement of operations</p> <p>Not completing the Monthly Site Checklist</p>

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
		The OEMP must be certified by the Environmental Representative that it is prepared in accordance with the Conditions of Consent. The OEMP is to be submitted for the approval of the Secretary no later than one month prior to the commencement of operation, or within such period otherwise agreed to by the Secretary. Operation must not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval, the Applicant must supply a copy of the OEMP to EPA and Council as soon as practicable.	
28	Environmental Representative	Prior to the commencement of construction, the Applicant must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment requires the approval of the Secretary. The Applicant must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the construction, and commissioning. An Environmental Representative must also be employed during operation	The Environmental Representative has not attended site since the commencement of operations.
36	Onsite Landscaping Plan	Prior to the commencement of operation of the development, the Applicant must prepare an Onsite Landscaping Plan. The On-Site Landscaping Plan is to address the visual impacts of the development as far as is reasonable and feasible including the turbines, site access roads, the substation, and the control and facilities building. The On-Site Landscaping Plan is to include, but not be limited to: <ul style="list-style-type: none"> <li>(a) identification of locations for planting and landscaping;</li> <li>(b) identification of species to be planted; and</li> </ul>	The success of the visual screenings has been variable and replanting has met with mixed success.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
		<p>(c) details of the maintenance program for on-site landscaping associated with the development.</p> <p>The On-Site Landscaping Plan is to be implemented within six months of commencement of operation.</p>	
37		<p>Prior to the commencement of operation, the Applicant must prepare a Roadside Landscape Management Plan for Crookwell Road. The Roadside Landscape Management Plan is to reasonably and feasibly screen the visual impact of the wind turbines located along Crookwell Road (between Pejar Road and the northern boundary of the site). The Roadside Landscape Management Plan is to be developed in consultation with the RMS, Council and land owners abutting Crookwell Road as bounded by the site. The Roadside Landscape Management Plan must include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of locations for plantings along Crookwell Road that will visually screen sections of the Crookwell II Wind Farm. Locations of plantings are not to compromise sight lines or clear zones, in accordance with the Austroads Guide to Road Design (as amended by RMS supplements), unless RMS agrees otherwise;</li> <li>(b) identification of species to be utilised that will provide effective screening from the road. Use of fast growing species is encouraged, where appropriate; and</li> <li>(c) details of the maintenance program.</li> </ul>	<p>The success of the visual screenings has been variable and replanting has met with mixed success.</p>

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
		The Roadside Landscaping Management Plan is to be implemented within six months of commencement of operation.	
83	Flora and Fauna Operations	<p>An Operation Flora and Fauna Management Sub Plan must be prepared as part of the OEMP.</p> <p>The Sub Plan must be prepared in consultation with the Department and OEH and include:</p> <p>(a) plans showing: terrestrial vegetation communities; important flora and fauna habitat areas; areas to be protected; and areas to be planted;</p> <p>(b) methods to manage impacts on flora and fauna species (terrestrial and aquatic) and their habitats which may be directly or indirectly affected by the development. These must include: habitat management procedures including rehabilitation requirements and active replanting of windrows;</p> <p>operation stage measures to minimise bird and bat disturbance, in particular reducing the incidence of bird/bat strike. Management measures that must be considered for areas near the turbines include:</p> <p>i. minimising the availability of raptor perches;</p> <p>ii. modifying structures to prevent perching;</p> <p>iii. management of lambing;</p>	Monthly Liaise with Landowner to restrict grain feeding underneath turbines.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
		iv. swift carcass removal; v. pest control, including rabbits; vi. management of stock (grain) feeding; vii. filling in of small dams that might attract insects and birds; viii. use of deterrents (eg. flags, marker balls); ix. minimising external lighting; x. turbine management, that might include the turning off of turbines that are predicted to cause unacceptable bird/bat mortality at identified times; xi. measures identified from research undertaken at other wind farms to reduce the incidence of bird/bat strike;  (c) performance criteria against which to measure the success of the methods; and a programme for reporting on the effectiveness of management measures against the identified performance criteria. Management methods must be reviewed where found to be ineffective.	
85	Soil and Water Management	Prior to commencement of construction and operation, a Soil and Water Management Plan must be prepared and implemented in consultation with the Water NSW and EPA, in accordance with Landcom’s guideline Managing Urban Stormwater: Soils and Construction (or its latest version) and the RMS	Not undertaking weekly inspections of: <ul style="list-style-type: none"> <li>• disturbed areas,</li> <li>• bunded areas</li> </ul>

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
		<p>Guideline for the Control of Erosion and Sedimentation in Roadworks (or its latest version). The Plan is to outline soil and water management measures to be implemented during construction and operation to minimise impacts to soil and vegetation, including but not limited to:</p> <p>(a) water quality safeguards to be implemented, as outlined in Chapter 9 and Table 21-2 of the EIS;</p> <p>(b) practices to manage soil and water where tracks and electrical cables cross water courses and drainage depressions;</p> <p>(c) inspection, maintenance and monitoring programs; and</p> <p>(d) (d) practices proposed to be used in the event of accidental spills.</p>	<ul style="list-style-type: none"> <li>erosion and sediment control measures</li> <li>rehabilitation areas</li> </ul>
87	Soil and Water Management	<p>Prior to the commencement of operation, a Stormwater Management Plan must be prepared and implemented. The Plan must detail measures to mitigate the impacts of stormwater run-off from the development during operation. The Plan must be consistent with Managing Urban Stormwater: Council Handbook (or its latest version) and where relevant, consistent with a catchment wide stormwater management plan</p>	<p>Not undertaking weekly inspections of:</p> <ul style="list-style-type: none"> <li>disturbed areas,</li> <li>bunded areas</li> <li>erosion and sediment control measures</li> <li>rehabilitation areas</li> </ul> <p>A maintenance agreement with a licenced contractor (certified to ISO14000 standard requirements) to ensure the treatment systems meet design</p>

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Item	Description	Non-Compliance
			specifications has not been undertaken.



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

#### 4.4 REVIEW OF MANAGEMENT PLANS

The following management plans were reviewed:

- Operation Environmental Management Plan (OEMP)
- Community Information Plan (CIP)
- Onsite Landscaping Plan (OSLMP)
- Roadside Landscape Management Plan (RLMP)
- Noise Compliance Strategy (NCS)
- Traffic Management Plan (TMP)
- Heritage Management Plan (HMP)
- Operation Flora and Fauna Management Sub Plan of OEMP
- Bird and Bat Adaptive Management Plan (BBAMP)
- Soil and Water Management Plan (SWMP)
- Stormwater Management Plan (SMP)

Compliance against these plans is detailed in Appendix C

#### 4.5 NON-COMPLIANCES AGAINST MANAGEMENT PLANS

There were six non-compliances against the commitments made in the OEMP and its sub plans. These are outlined above in Table 4 as they technically are non – compliances against the Conditions of Consent.

#### 4.6 COMPLIANCE OF ACTUAL AND PREDICTED IMPACTS

The EIS predicted a number of environmental impacts and proposed a range of mitigation measures to minimise their impact. The EIS covered the following environmental impacts and proposed mitigation measures:

- Landuse
- Geology, soils and Hydrogeology
- Hydrology and Surface Water
- Landscape and Visual Impacts
- Flora and Fauna
- Noise
- Meteorology and Air Quality
- Traffic and Transportation
- Heritage and Archaeology
- Hazards and Risks
- Energy and Greenhouse
- Electromagnetic Interference

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Permanent controls include the design and construction of access roads, installation of erosion and sediment control measures, implementation of revegetation measures and installation of permanent drainage structures. This has reduced the environmental risks which were predicted in the EIS.

Environmental monitoring for noise and vibration, water quality and dust have been undertaken during the construction and operation phases. The results complied with the relevant criteria. The number of complaints from neighbours and nearby residents for noise and has significantly reduced since the commencement of operations.

The overall standard of environmental controls was deemed high and appeared to be well planned and implemented.

#### 4.7 NON-COMPLIANCES OF ACTUAL AND PREDICTED IMPACTS

There were two non – compliances against the Mitigation Measures proposed in the EIS. These non – compliances are minor and have had no impact on the environmental impact from the operation of the site. The observed non – compliances were:

- The Operations Site Induction did not include reference:
  - Noise control and available noise reduction measures
  - Identification and protection of archaeological sites
  - Managing hot works
- There was no maintenance agreement in place for treatment on site effluent management system.

#### 4.8 PENALTY NOTICES

No penalty notices had been issued during the operational period.

#### 4.9 PREVIOUS AUDIT ACTIONS

Global Power Generation prepared a “Construction and Pre-Operation Compliance Report” in 2018. It identified three levels of compliance: compliant, ongoing, and not yet applicable. The Report did not identify any non-compliances against the Conditions of Consent for the construction phase.

#### 4.10 MATTERS CONSIDERED RELEVANT BY AUDITOR OR DPE

The auditor consulted with a DPIE representative prior to conducting the audit who provided a list of requirements which is shown in Table 2 above. The site’s compliance with the DPIE requirements is shown in Table 3 DPIE Considerations

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Table 5 DPIE Considerations

<b>DPIE Requirement</b>	<b>Compliance</b>
Compliance with layout plans etc,	Compliant
CC and OCs obtained	Compliant
VPA status	Compliant
Monitoring records	Ongoing
OEMP compliance	See 4.5 above
Community information plan (CIP) implementation and monitoring	Compliant
Visual management/progress with landholders if applicable	Ongoing
Landscape mgt plan progress and monitoring	Compliant
Roadside landscape mgt plan progress, mgt and monitoring	Compliant
Noise monitoring and compliance with criteria	Compliant
Rehab progress of crown roads	Ongoing
Roads all upgraded completed to the satisfaction of roads authority	Compliant
Status of Road safety assessment and changes	Compliant
Management / protection of heritage items	Ongoing
Management / protection of flora and fauna (particular bird and bat monitoring and management)	Compliant
Status of safety management system	Compliant
Rehabilitation on site	Ongoing
Weed management on site	Ongoing
Erosion and sediment control and management onsite.	Ongoing
Compliant register and community engagement management	Compliant
Actions status form construction audit	Ongoing

#### 4.11 COMPLAINTS

Following a review of the Complaints Register only twelve complaints have been received since operations commenced. The majority of these were during 2019 and were about mobile phone coverage, television interference, noise, and aviation hazard lights. The Complaints register shows that all the complaints have been addressed and resolved.

#### 4.12 INCIDENTS

There have been no incidents on site during audit period.

#### 4.13 EVIDENCE COLLECTED

Evidence was collected during the audit through the following means:

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

- Site visit
  - Refer to Appendix B for site photographs
- Interviews
  - Refer to Section 3.4 for the personnel interviewed during the audit
- Review of Project documents and records
  - Refer to Appendix C for a list of documents reviewed during this audit

Refer to Appendix D for the completed audit checklist, outlining the evidence collected against each compliance condition.

#### 4.14 OPPORTUNITIES

The Audit provides the opportunity to review the OEMP and its sub plans to reflect the operational status of the Project. A review of the OEMP and its sub plans should include the timing of site inspections to ensure that they are targeted and are gathering relevant information that can be used to inform management decisions. Another opportunity is the review of the revegetation and tree planting strategies recommended for the site.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## 5 NON-COMPLIANCES AND RECOMMENDATIONS

### 5.1 NON-COMPLIANCES AND RECOMMENDATIONS

There were eight non-compliances against the Conditions of Consent. These non – compliances have not impacted on the environmental impacts and outcomes on site. With the exception of the success of screening plantings the remainder of the non – compliances were of an administrative nature. Recommendations to remediate the non – compliances are contained in Table 6.

Table 6 DPIE Non – Compliances and Recommendations

Condition of Consent	Condition Summary	Non-Compliance	Recommendation
27	Preparation and Implementation of the Operation Environmental Management Plan (OEMP) to detail an environmental management framework, practices and procedures to be followed during the operation of the development.	The Annual Return for the Environmental Protection License 20911 has not been submitted since the commencement of operations  Not completing the Monthly Site Checklist	Prepare and lodge EPL Annual Return within the EPA timeframe  Test the Pollution Incident Response Management Plan required by the EPL  Review the Monthly Site Checklist as part of the OEMP review
28	An Environmental Representative must also be employed during operation	The Environmental Representative has not attended site since the commencement of operations.	Reengage the Environmental Representative.
36	Prior to the commencement of operation of the development, the Applicant must prepare an Onsite Landscaping Plan.	The success of the visual screenings has been variable and replanting has met with mixed success.	Review obligations relating to visual screenings and implement a program of replanting to ensure compliance.  Consult with landowners recognising that some landowners may not want

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Condition Summary	Non-Compliance	Recommendation
			replanting on their property.  Investigate engaging a landscape specialist/horticulturist is engaged to oversee the replanting/landscaping to optimise the survival rate of plantings
37	Prior to the commencement of operation, the Applicant must prepare a Roadside Landscape Management Plan for Crookwell Road.	The success of the visual screenings has been variable and replanting has met with mixed success.	Review obligations relating to visual screenings and implement a program of replanting to ensure compliance  Consult with landowners recognising that some landowners may not want replanting on their property.  Investigate engaging a landscape specialist/horticulturist is engaged to oversee the replanting/landscaping to optimise the survival rate of plantings
83	An Operation Flora and Fauna Management Sub Plan must be prepared as part of the OEMP.	Monthly Liaise with Landowner to restrict grain feeding underneath turbines.	Review this requirement in the OFFMP to reflect that grain feeding only occurs during extreme climatic conditions such as drought.
85	Prior to commencement of construction and operation, a Soil and Water Management Plan	Not undertaking weekly inspections of: <ul style="list-style-type: none"> <li>• disturbed areas,</li> <li>• bunded areas</li> </ul>	Review and update the requirement for weekly inspections. This requirement reflects a

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Condition Summary	Non-Compliance	Recommendation
	must be prepared and implemented in consultation with the Water NSW and EPA.	<ul style="list-style-type: none"> <li>erosion and sediment control measures</li> <li>rehabilitation areas</li> </ul>	period when the site may not have been fully rehabilitated.
87	Prior to the commencement of operation, a Stormwater Management Plan must be prepared and implemented.	<p>Not undertaking weekly inspections of:</p> <ul style="list-style-type: none"> <li>disturbed areas,</li> <li>bunded areas</li> <li>erosion and sediment control measures</li> <li>rehabilitation areas</li> </ul> <p>Establish a maintenance agreement with a licenced contractor (certified to ISO14000 standard requirements) to ensure the treatment systems meet design specifications not undertaken</p>	<p>Review and update the requirement for weekly inspections. This requirement reflects a period when the site may not have been fully rehabilitated.</p> <p>Review requirement for ISO14001 certification.</p> <p>Appoint a suitably qualified contractor to inspect wastewater treatment system.</p>

## 5.2 POST AUDIT COMPLIANCE ACTION

Following the site audit on which was undertaken 12<sup>th</sup> May 2022 GPG undertook several remediation measures. The compliance measures undertaken are shown in Table 7 Post Audit Compliance.

Table 7 Post Audit Compliance

Condition of Consent	Condition Summary	Non-Compliance	Post Audit Action
28	An Environmental Representative must also be employed during operation	The Environmental Representative has not attended site since the commencement of operations.	The Environmental Representative has been contacted and will be visiting the site shortly
27	Preparation and Implementation of the Operation Environmental Management Plan (OEMP) to detail an environmental	The Annual Return for the Environmental Protection License 20911 has not been	The EPL Annual Return has been prepared and submitted to the EPA

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Condition of Consent	Condition Summary	Non-Compliance	Post Audit Action
	management framework, practices and procedures to be followed during the operation of the development.	submitted since the commencement of operations	The Pollution Incident Response Management Plan has been tested.
87	Prior to the commencement of operation, a Stormwater Management Plan must be prepared and implemented.	Establish a maintenance agreement with a licenced contractor (certified to ISO14000 standard requirements) to ensure the treatment systems meet design specifications not undertaken	The wastewater facility has been inspected and serviced by a suitably qualified contractor.

### 5.3 EFFECTIVENESS OF EIS MITIGATION STRATEGIES

The EIS was approved in 2004 and Conditions of Consent in 2005. Both documents were written when there were few operational wind farms in NSW and the expert knowledge base was not present regulatory bodies. As a result, several assertions made in the EIS were based on a limited knowledge of the impacts a wind farm has on its environment.

That said the mitigation measures outlined within the EIS have been generally successful. However, activities such as weekly inspections of roads, rehabilitation, erosion and sediment control measures may be appropriate during construction. This is because the site may contain areas of bare ground and incomplete works. During the operations phase this level of inspection is not appropriate as the roads are completed, table drains have been stabilised and revegetation has been undertaken.

### 5.4 RECOMMENDATIONS FOR UPDATING OF OEMP AND SUB PLANS

The following recommendations are made for the OEMP and its sub plans:

- Revise the OEMP and set a frequency of inspections and focus areas to reflect operational activities.
- Revise the site checklist, including:
  - Condition of the site access points to ensure that it is maintained
  - Effectiveness of Permanent Rock Scour protection.
  - Potential for erosion/degradation at areas where there is likely to be concentrated flow
- Update the Site Induction to include reference:
  - Noise control and available noise reduction measures



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

- Identification and protection of archaeological sites
- Hot works
- Engage a suitably qualified person to review the operation of the onsite wastewater system and prepare a maintenance schedule.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## Appendix A Planning Secretary Audit Team Agreement



Department of Planning and Environment

Mr Adrian Ogilvie  
Safety Manager  
Crookwell Development Pty Ltd  
24 Marcus Clarke St  
Canberra ACT 2601

8 February 2022

Dear Mr Ogilvie

**Crookwell 2 Wind Farm - (DA176-9-2004)  
Environmental Impact Audit Report – Operation – Auditor approval request 2022**

I refer to your request (DA176-9-2004-PA-7) submitted to the Department of Planning and Environment (the Department) on 7 February 2022 for the Secretary's approval of suitably qualified persons to prepare the Environmental Impact Audit Report – Operation (the Audit), in accordance with Condition 25 of DA176-9-2004 as modified (the Consent) for the Crookwell 2 Wind Farm (the Project).

The Department has reviewed the nomination and information you have provided and is satisfied that the expert is suitably qualified and experienced. Consequently, in accordance with Condition 25 of the Consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to Mr Patric Millar of Ecosite Solutions Pty Ltd to undertake the Audit and prepare the Audit report. Please ensure this correspondence is appended to the Independent Audit Report.

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

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Katrina O'Reilly on 0429400261 or [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

Katrina O'Reilly



**Department of Planning and Environment**

Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

Mr Adrian Ogilvie  
Safety Manager  
CROOKWELL DEVELOPMENT PTY LTD  
24 MARCUS CLARKE STREET  
Canberra ACT 2601

20/04/2022

Dear Mr Ogilvie

**Crookwell 2 Wind Farm - (DA176-9-2004)**  
**Additional Auditor request**

I refer to your request (DA176-9-2004-PA-8) submitted to the Department of Planning and Environment (the Department) on 19 April 2022 for the Secretary's approval of an additional suitably qualified person to undertake the Independent Environmental Audit (IEA) and prepare the IEA report for Crookwell 2 Wind Farm (the project) (DA176-9-2004).

The Department has reviewed the nomination and information you have provided and is satisfied that Mr Richard Peterson of Trigalana Environmental Pty Ltd is suitably qualified and experienced. Consequently, in accordance with Condition 25 of DA176-9-2004 I can advise that the Secretary approves the appointment of Mr Peterson. This approval is conditional on the auditor being independent of the project.

Please ensure this correspondence is appended to the IEA Report.

Should you wish to discuss the matter further, please contact on 0429400261 or at [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



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

## Appendix B Site Inspection Photographs



Internal Access Road



Site Access with locked gates



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C



Fenced screening planting and permanent drainage works



Site Access with cattle grid





Roadside revegetation





Substation transformer bund



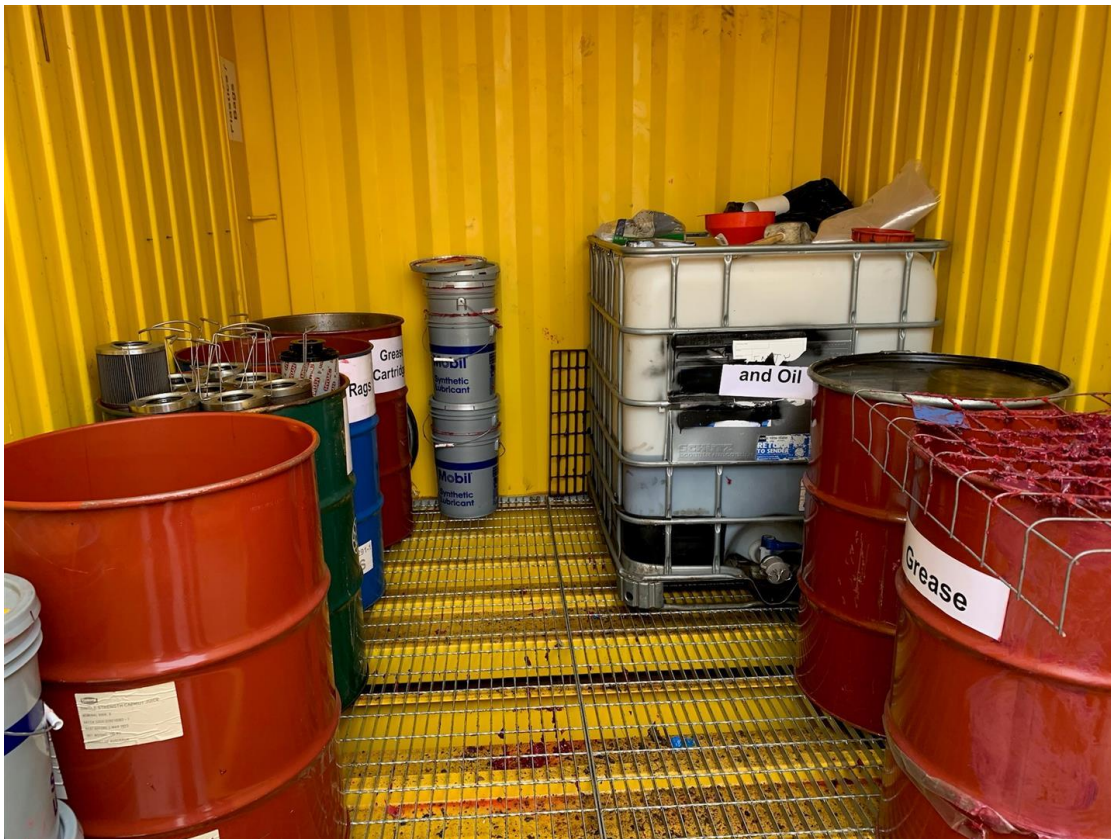


Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Turbine hardstand showing revegetation of batters



Spill kit



Bunded fuel storage

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## Appendix C Document Review List

Crookwell II Wind Farm Environmental Impact Statement (three volumes) prepared by URS, dated July 2004

Proposed Crookwell II Wind Farm: Response to Department's Questions, URS, dated 25 October 2004;

Crookwell II NIA Response to EPA Queries, Richard Heggie Associates, dated 1 September 2004;

Crookwell II Response to EPA Queries and Concawe Verification Study, Richard Heggie Associates, dated 10 September 2004;

Crookwell II NIA – Follow Up Response to EPA Queries, Richard Heggie Associates, 22 September 2004;

Crookwell II Wind Farm Additional Raptor Survey Assessment, URS, 12 November 2004;

Crookwell II Wind Farm 8 Part Test – Swift Parrot (*Icthyophaga diabolus*), URS, 15 November 2004;

Crookwell II Wind Farm Spring Reptiles Survey, URS, 22 December 2004;

Results of an Early Summer Survey for Bats at the Proposed Crookwell 2 Wind Farm, Crookwell, NSW, Glen Hoyer, Fly By Night Bat Surveys Pty Ltd, January 2005;

Memorandum from URS to Gamesa Energy Australia, Crookwell II Wind Farm Shadow Flicker Assessment, dated 16 December 2004;

Memorandum from URS to Gamesa Energy Australia entitled Crookwell II – Aerial Spraying, dated 15 February 2005;

Crookwell 2 Site Map, Revision 1, dated 03/03/05 by TME Australia Pty Ltd;

Modification Application 176-8-2004-MOD1 including Crookwell II Wind Farm Part 1 – Statement of Environmental Effects and Crookwell II Wind Farm Part 2 – Appendices prepared by Tract Consultants, dated January 2009 and Response to Submissions Received prepared by Tract Consultants, dated April 2009;

Application to modify the development consent (Mod 2), including the Environmental Assessment prepared by Mecone and dated September 2016, and the associated

Response to Submissions, dated June 2017

Operation Environmental Management Plan (OEMP)

Community Information Plan (CIP)

Onsite Landscaping Plan (OSLMP)

Roadside Landscape Management Plan (RLMP)

Noise Compliance Strategy (NCS)

Traffic Management Plan (TMP)

Heritage Management Plan (HMP)

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

Operation Flora and Fauna Management Sub Plan of OEMP

Bird and Bat Adaptive Management Plan (BBAMP)

Soil and Water Management Plan (SWMP)

Stormwater Management Plan (SMP)

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

## Appendix D Independent Audit table

Project Approval DA-176-8-2004-I Conditions of Consent				
Id	Reference	Requirement	Evidence Required	Compliant
7	Notification to Department	Prior to the erection of any wind turbine, commencement of operation and/or decommissioning of any wind turbine, the Applicant must notify the Department in writing of the date of commencement.	Notification to Department	Yes
17	Pre-Operation Compliance Report, Condition	The Applicant must submit a Pre-Operation Compliance Report to the Secretary at least two weeks prior to the commencement of operation (or within a time agreed to by the Secretary). The Pre-Operation Compliance Report must include:  <ul style="list-style-type: none"> <li>(a) details of how the Conditions of Consent required to be addressed prior to commencement of operation have been complied with;</li> <li>(b) details of when each relevant Condition of Consent was complied with, including submission dates of any required report and/or approval dates; and</li> <li>(c) details of any approvals or licences required to be issued by relevant Government Agencies prior to the commencement of operation.</li> </ul>	Pre-Operation Compliance Report	Yes
21	General Monitoring	The Applicant must undertake all monitoring, including recording and reporting of monitoring results, as required under this consent.		
22		The results of any monitoring required under this consent must be recorded and maintained, as set out below. All records must be:  <ul style="list-style-type: none"> <li>(a) in a legible form, or in a form which can be readily reduced to a legible form;</li> </ul>		

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		<p>(b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>(c) produced in a legible form to the Secretary of the Department on request.</p>		
23		<p>The following records must be kept in respect of any samples required to be collected:</p> <p>(a) the date(s) on which the sample was taken;</p> <p>(b) the time(s) at which the sample was taken;</p> <p>(c) the location at which the sample was taken; and</p> <p>(a) (d) the name of the person who collected the sample.</p>		
27	Operational Environmental Management Plan, Condition	<p>The Applicant must prepare and implement an Operation Environmental Management Plan (OEMP) to detail an environmental management framework, practices and procedures to be followed during the operation of the development. The Plan must include, but not necessarily be limited to:</p> <p>(a) identification of all statutory and other obligations that the Applicant is required to fulfil in relation to operation of the development, including all consents, licences, approvals and consultations;</p> <p>(b) a description of the roles and responsibilities for all relevant employees involved in the operation of the development;</p> <p>(c) overall environmental policies and principles to be applied to the operation of the development;</p> <p>(d) standards and performance measures to be applied to the development, and a means by which environmental performance can be periodically reviewed and improved;</p> <p>(e) management policies to ensure that environmental performance goals are met and to comply with the Conditions of Consent; and (f) the Management Plans required to be included in the OEMP as specified in the Conditions of Consent.</p> <p>The OEMP must be certified by the Environmental Representative that it is prepared in accordance with the Conditions of Consent. The OEMP is to be submitted for the approval of</p>	Operation Environmental Management Plan	No

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		the Secretary no later than one month prior to the commencement of operation, or within such period otherwise agreed to by the Secretary. Operation must not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval, the Applicant must supply a copy of the OEMP to EPA and Council as soon as practicable.		
28	Environmental Representative	Prior to the commencement of construction, the Applicant must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment requires the approval of the Secretary. The Applicant must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the construction, and commissioning. An Environmental Representative must also be employed during operation	Evidence of inspection during operations by Environmental Representative	No
31	Complaints Register	The Applicant must keep a legible record of all complaints received in an up-to-date Complaints Register. The Register must record, but not necessarily be limited to: <ul style="list-style-type: none"> <li>(a) the date and time, where relevant, of the complaint;</li> <li>(b) the means by which the complaint was made (telephone, mail or email);</li> <li>(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</li> <li>(d) the nature of the complaint;</li> <li>(e) any action(s) taken by the Applicant in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>(a) (f) if no action was taken by the Applicant in relation to the complaint, the reason(s) why no action was taken.</li> </ul>	Complaints Register	Yes
33	Community Consultative Committee	The Applicant must operate a Community Consultative Committee for the development to the satisfaction of the Secretary, in accordance with the Community Consultative Committee Guidelines for State Significant Project (2016), or its latest version	Minutes of Community Consultative Committee during operations phase.	Yes



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

36	Landscaping Requirements	<p>Prior to the commencement of operation of the development, the Applicant must prepare an Onsite Landscaping Plan. The On-Site Landscaping Plan is to address the visual impacts of the development as far as is reasonable and feasible including the turbines, site access roads, the substation, and the control and facilities building. The On-Site Landscaping Plan is to include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of locations for planting and landscaping;</li> <li>(b) identification of species to be planted; and</li> <li>(c) details of the maintenance program for on-site landscaping associated with the development.</li> </ul> <p>The On-Site Landscaping Plan is to be implemented within six months of commencement of operation.</p>	Onsite Landscaping Plan  Evidence of implementation	No
37	Roadside Landscape Management Plan	<p>Prior to the commencement of operation, the Applicant must prepare a Roadside Landscape Management Plan for Crookwell Road. The Roadside Landscape Management Plan is to reasonably and feasibly screen the visual impact of the wind turbines located along Crookwell Road (between Pejar Road and the northern boundary of the site). The Roadside Landscape Management Plan is to be developed in consultation with the RMS, Council and land owners abutting Crookwell Road as bounded by the site. The Roadside Landscape Management Plan must include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(a) identification of locations for plantings along Crookwell Road that will visually screen sections of the Crookwell II Wind Farm. Locations of plantings are not to compromise sight lines or clear zones, in accordance with the Austroads Guide to Road Design (as amended by RMS supplements), unless RMS agrees otherwise;</li> <li>(b) identification of species to be utilised that will provide effective screening from the road. Use of fast growing species is encouraged, where appropriate; and</li> <li>(c) details of the maintenance program.</li> </ul>	Roadside Landscape Management Plan  Evidence of implementation	No



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		The Roadside Landscaping Management Plan is to be implemented within six months of commencement of operation.		
43	Shadow Flicker	The Applicant must ensure that shadow flicker from operational wind turbines does not exceed 30 hours per annum at any residence not associated with the development.	Complaints received	Yes
48	Operational Noise Criteria – Wind Turbines	<p>The Applicant must ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 2.</p> <p>Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department’s Wind Energy: Noise Assessment Bulletin (2016) (or its latest version) and the provisions in Appendix 5. If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the requirements in the NSW guideline.</p> <p>However, these criteria do not apply if the Applicant has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Complaints received / monitoring results	Yes
49	Operational Noise Criteria – Ancillary Equipment	<p>The Applicant must ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) <math>L_{Aeq}(15 \text{ minute})</math> at any residence not associated with the development.</p> <p>Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (or its equivalent).</p>	Complaints received / monitoring results	Yes
50	Operational Noise Monitoring	The Applicant must prepare a Noise Compliance Strategy which must be submitted to and approved by the Secretary prior to commissioning of the wind turbines. The Noise Compliance Strategy must describe the process by which any noise management modes or sector management can be verified and outline how the noise criteria will be achieved.	Noise Compliance Strategy	Yes

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

51	Operational Noise Monitoring	<p>Within 3 months of the commencement of operations (or the commencement of operation of a cluster of turbines, if the development is to be staged), the Applicant must:</p> <p>(a) undertake noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and</p> <p>(b) submit a copy of the monitoring results to the Department and the EPA.</p>	Operational Noise Monitoring Report	Yes
59	Road Dilapidation Report	<p>Prior to the commencement of construction, the Applicant must undertake a 'before' road dilapidation report utilising the ARRB 'laser car', or an alternative method agreed with Council, to assess the existing condition of Woodhouselee Road between Crookwell Road and the site access point on Woodhouselee Road. The report must be undertaken in conjunction with Council's Director – Works.</p> <p>Following completion of construction, and prior to the commencement of operation, an 'after' road dilapidation report utilising the ARRB 'laser car', or an alternative method agreed with Council, must be prepared in consultation with Council to determine the works required by the Applicant to restore the road to at least its pre-development condition.</p> <p>The Applicant must restore the road to a standard no less than recorded in the initial dilapidation report, unless the damage can be reasonably attributed to influences other than the development.</p> <p>The Applicant must restore the road to at least its pre-development condition, to the satisfaction of Council within three (3) months of the commencement of operation, unless otherwise agreed by Council.</p>	<p>Road Dilapidation Report</p> <p>Evidence of remediation works</p>	Yes
68	Crown Roads	The Applicant is to undertake rehabilitation of disturbed areas within the Crown Public Roads system within two (2) years of completion of the construction as directed by the DPI - Lands and Forestry or any other authorised parties.	Evidence of Rehabilitation, if	Yes

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

			required by Crown Lands	
70	Operational Traffic	<p>Prior to commencement of operation of the development, all works relating to permanent vehicle access to the site must be completed. Permanent access from Woodhouselee Road must be completed to the satisfaction of Council and comply with the following requirements unless otherwise agreed by Council:</p> <ul style="list-style-type: none"> <li>(a) access points must have an adequate sight stopping distance (180 metres minimum) available in both directions;</li> <li>(b) any gate must be so located that there is sufficient distance for a vehicle (rigid truck) to stand clear of the road; and</li> <li>(a) (c) the driveway must be sealed for a minimum distance of 50 metres measured from the edge of the Woodhouselee Road pavement.</li> </ul>	Evidence of permanent access points	Yes
71	Road Safety	<p>The Applicant must, in consultation with the RMS and Council, identify any road safety changes along Crookwell Road (between Pejar Road and the northern boundary of the site), that may have arisen during the first 12 months of operation. Road safety changes must include, but not be limited to, any change in accident rates. The Applicant must implement any reasonable and feasible mitigation measures as required by the RMS, to address any road safety impacts that could be attributable to the development.</p>	Consultation with RMS and Council,	Yes
82	Rehabilitation	<p>Maintenance reports about the rehabilitated riparian zones must be prepared and submitted to the Department after completion of planting, and every six months thereafter until the completion of the maintenance period. The report must include:</p> <ul style="list-style-type: none"> <li>(a) achievements of the performance criteria outlined in the VMP</li> <li>(b) identification of problems in implementing the VMP</li> <li>(b) (c) discussion about the stability and condition of any associated stream works</li> </ul>		No

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

83	Flora and Fauna Operations	<p>An Operation Flora and Fauna Management Sub Plan must be prepared as part of the OEMP.</p> <p>The Sub Plan must be prepared in consultation with the Department and OEH and include:</p> <ul style="list-style-type: none"> <li>(a) plans showing: terrestrial vegetation communities; important flora and fauna habitat areas; areas to be protected; and areas to be planted;</li> <li>(b) methods to manage impacts on flora and fauna species (terrestrial and aquatic) and their habitats which may be directly or indirectly affected by the development. These must include: habitat management procedures including rehabilitation requirements and active replanting of windrows;</li> </ul> <p>operation stage measures to minimise bird and bat disturbance, in particular reducing the incidence of bird/bat strike. Management measures that must be considered for areas near the turbines include:</p> <ul style="list-style-type: none"> <li>i. minimising the availability of raptor perches;</li> <li>ii. modifying structures to prevent perching;</li> <li>iii. management of lambing;</li> <li>iv. swift carcass removal;</li> <li>v. pest control, including rabbits;</li> <li>vi. management of stock (grain) feeding;</li> <li>vii. filling in of small dams that might attract insects and birds;</li> <li>viii. use of deterrents (eg. flags, marker balls);</li> <li>ix. minimising external lighting;</li> <li>x. turbine management, that might include the turning off of turbines that are predicted to cause unacceptable bird/bat mortality at identified times;</li> <li>xi. measures identified from research undertaken at other wind farms to reduce the incidence of bird/bat strike;</li> </ul> <ul style="list-style-type: none"> <li>(c) performance criteria against which to measure the success of the methods; and a programme for reporting on the effectiveness of management measures against the</li> </ul>	Operation Flora and Fauna Management Sub Plan	No
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Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		identified performance criteria. Management methods must be reviewed where found to be ineffective.		
84	Bird and Bat Adaptive Management Program	<p>A Bird and Bat Adaptive Management Program must be prepared in consultation with OEH and submitted to the Secretary for approval prior to the commencement of operations, 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 Assessing the Impacts of Windfarms on Birds - Protocols and Data Set Standards. The Program must be undertaken by a suitably qualified expert, approved by the Secretary.</p> <p>The Program must incorporate Monitoring, and a Decision Matrix that clearly sets out how the Applicant will respond to the outcomes of monitoring. It must:</p> <ul style="list-style-type: none"> <li>(a) include at least 12 months of current (or updated) baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could potentially be affected by the development, including updated surveys for raptors and baseline mapping of any raptor nests identified on the site;</li> <li>(b) incorporate an ongoing role for the suitably qualified expert;</li> <li>(c) set out monitoring requirements. The requirements must account for natural and human changes to the surrounding environment that might influence bird and/or bat behaviour such as changes in land use practices, and significant changes in water levels in nearby water bodies;</li> <li>(d) incorporate a decision making framework that sets out specific actions and when it may be required to reduce identified impacts on birds and bats;</li> <li>(e) set out available mitigation measures;</li> <li>(f) incorporate reporting requirements on the outcomes of monitoring, on the application of the decision making framework, the need for mitigation measures, progress with implementation of such measures, and their success. Reports must be prepared on an annual basis, from the commencement of operation, and must be prepared within 2</li> </ul>	Bird and Bat Adaptive Management Program  Monitoring Report	Yes

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		<p>months of the end of the reporting period and be provided to the Secretary. The Secretary may vary the reporting requirement or period by notice in writing to the Applicant;</p> <p>(g) identify any necessary mitigation measures and implementation strategy including, but not limited to, those referred in Condition 83.</p> <p>The Applicant is required to implement reasonable and feasible mitigation measures where the need for further action is identified through the Bird and Bat Adaptive Management Program.</p>		
85	Soil and Water Management	<p>Prior to commencement of construction and operation, a Soil and Water Management Plan must be prepared and implemented in consultation with the Water NSW and EPA, in accordance with Landcom’s guideline Managing Urban Stormwater: Soils and Construction (or its latest version) and the RMS Guideline for the Control of Erosion and Sedimentation in Roadworks (or its latest version). The Plan is to outline soil and water management measures to be implemented during construction and operation to minimise impacts to soil and vegetation, including but not limited to:</p> <p>(a) water quality safeguards to be implemented, as outlined in Chapter 9 and Table 21-2 of the EIS;</p> <p>(b) practices to manage soil and water where tracks and electrical cables cross water courses and drainage depressions;</p> <p>(c) inspection, maintenance and monitoring programs; and</p> <p>(d) (d) practices proposed to be used in the event of accidental spills.</p>	Soil and Water Management Plan  Inspection, maintenance and monitoring programs	No
87	Soil and Water Management	<p>Prior to the commencement of operation, a Stormwater Management Plan must be prepared and implemented. The Plan must detail measures to mitigate the impacts of stormwater run-off from the development during operation. The Plan must be consistent with Managing Urban Stormwater: Council Handbook (or its latest version) and where relevant, consistent with a catchment wide stormwater management plan</p>	Stormwater Management Plan	No

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

101	Bush Fire Fighting	The Applicant must consult with the local RFS after the commencement of operation and any other time thereafter as required by the RFS, to ensure that the local RFS is familiar with the development, including location and identification of wind turbines for the purpose of fast access in emergencies.	Evidence of consultation with RFS	Yes
102	Safety Management System	At least two month prior to the commencement of commissioning, the Applicant must prepare a report outlining a comprehensive Safety Management System, covering all on-site systems related to ensuring the safe operation of the development. The report must clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Department upon request. The Safety Management System must be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management', and should include: <ul style="list-style-type: none"> <li>(a) procedures and programs for the maintenance and testing of the safety related equipment to ensure its integrity over the life of the wind farm;</li> <li>(b) an outline of a documented procedure for the management of change;</li> <li>(c) procedures and programs for liaison and regular drills with the local RFS; and</li> <li>(d) procedures for regular fire prevention inspections by the local RFS and implementation of recommendations.</li> </ul>	Evidence that Safety Management System was in place prior to commissioning	Yes
A 3	Voluntary Planning Agreement Upper Lachlan Shire Council	\$2,500 (adjusted annually to increases in the CPI) per wind turbine built per annum within the Upper Lachlan Shire Council local government area over the operational life of the development, commencing on the date on which the development begins 'operation' and ceasing when the development is 'decommissioned' in accordance with the definitions within this consent.	Evidence of payment of VPA to Upper Lachlan Shore Council. Application guidelines	Yes

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

<b>Summary of Actions arising from Operational Environmental Management (Sub) Plans and Procedures</b>					
<b>Environmental Aspect</b>	<b>Controls, Actions and Requirements</b>	<b>Frequency and/or Timing</b>	<b>Evidence Required</b>	<b>Compliant</b>	<b>Effectiveness of Mitigation Safeguard Measures</b>
RSLMP and OSLP-001	Appoint Landscape Contractor and undertake the necessary preparation prior to planning	Jan 2019	Trees planted	Yes	
RSLMP and OSLP-002	Complete landscape planting and fencing (tree protection)	Autumn 2019 – to be adapted to avoid weather extremes		Yes	
RSLMP and OSLP-003	Establish a monitoring program for planted trees using the drawings as an audit sheet to mark poor performance	Jan-19		Yes	
RSLMP and OSLP-004	Undertake quarterly audits of planted trees. Audit to include photographic records as a measure of success of the planting program. Record mortality (and replacement) rates of planted trees.	Every 3-months after initial planting and for a period of not less than 2-years	Audit report	Yes	
RSLMP and OSLP-005	Replace dead or missing plants with equivalents	As needed after each audit		No	
RSLMP and OSLP-006	Check for any damage and/or missing stake or guards	Every 3-months after initial planting and for a period of not less than 12-months		Yes	



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

RSLMP and OSLP-007	Make repairs and/or replace stakes / tree guards as necessary	As needed after each audit		Yes	
RSLMP and OSLP-008	Remove stakes and tree guards once trees are self-supporting	Approx. 12-months after planting		Not Triggered	
RSLMP and OSLP-009	Check planting area for weed growth and or infestation	Every 3-months after initial planting and for a period of not less than 2-years	Weed status	Yes	
RSLMP and OSLP-010	Undertake weed control as necessary	As needed after each audit and for a period of not less than 2-years		Yes	
CoC-12	The Applicant must ensure that all necessary licences, permits and approvals are obtained and kept up-to-date as required throughout the life of the development. No Condition of this Consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approvals.	Annual		No	
CoC-28	Ensure contract to employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary during operation is maintained	Annual		No	
NCS-001	Background Noise Monitoring	Prior to Operation	Background Noise Report	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

NCS-002	Program pre-determined noise management parameters into GE SCADA Control System	During commissioning		Yes	
NCS-003	Compliance Operational Noise Monitoring	Within 3-months of commencement of Operation of Wind-farm	Compliance Noise Report	Yes	
NCS-004	Implement additional noise management and turbine optimisation program based on monitoring results (if required)	Within 3-months of commencement of Operation of Wind-farm of (if required)	If required	Not Triggered	
NCS-005	Produce Compliance Noise Report	Within 3-months of commencement of Operation of Windfarm	Compliance Noise Report	Yes	
WMP-001	Engage licensed waste contractors to collect waste	As needed		Yes	
WMP-002	Identification of Controlled Waste [refer to Protection of the Environment Operations (Waste) Regulation 2014 Schedule 1	Monthly – review with Contractors	Waste separation bins	Yes	
WMP-003	Maintain copies of <i>Controlled Waste Tracking Sheets</i> for any waste considered Controlled Waste	As needed at time of disposal		Yes	
WMP-004	Inspection utilising the Hazardous / Universal Waste Storage Inspection Form (see APPENDIX 13)	Weekly		No	
OFFMP-001	Monitor vegetation	Quarterly	Inspection Report	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

OFFMP-002	Monitor Weeds – undertake control with Contractor (complete Pesticide Application Record Sheet – see APPENDIX 14)	Quarterly	Inspection Report	Yes	
OFFMP-003	Ecologist to undertake independent monitoring of rehabilitation	6-months for a minimum of 2-years	Ecologist Report	Yes	
OFFMP-004	Carcass removal - stock or kangaroo carcasses (and any introduced or native animals) to be removed from within 200m of any turbine and disposed of. Utilise Site Monthly Environmental Checklist (see APPENDIX 15).	Monthly	Site Monthly Environmental Checklist	Yes	Monthly checklist requires updating.
OFFMP-005	Liaise with Landowner to restrict lambing from within 200m of any turbine.	Seasonal (usually late autumn / winter)	As required	Yes	
OFFMP-006	Liaise with Landowner to restrict grain feeding underneath turbines.	Monthly		Yes	
OFFMP-007	Light minimisation programs subject to any mortality rate monitoring requirements	As required from OEH	As required	Not Triggered	
BBMP-001	Obtain (submit application and maintain) a permit from OEH under the National Parks and Wildlife Act 1974 to handle and keep native wildlife (even dead wildlife) as part of the monitoring program.	Prior to operation	Permit	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

BBMP-002	Implement and action <i>Incidental Carcass Protocol</i>	As needed	As required	Yes	
BBMP-003	Implement <i>Injured Bird and Bat Protocol</i> and ensure all Crookwell 2 WF employees and contractors are familiar with this program.	As needed	Included in site Induction	Yes	
BBMP-004	Ensure a robust carcass-monitoring program (random or stratified random sampling design) to detect birds and bats that collide fatally with wind turbines is in place	Monthly inspections – for a minimum of 2-years.	Monthly reports	Yes	
BBMP-005	Impact Trigger for Threatened Species. A threatened bird/bat species (or recognisable parts thereof) listed as threatened under the Commonwealth EPBC Act or NSW Threatened Species Conservation Act 1995, is found dead or injured under or close to a wind turbine. The <i>Decision Making Framework</i> (Figure 3 of the referenced BBMP) will be implemented.	As needed. Report to OEHL within 5-business days.  Immediate investigation (to be completed within 10 days) by an appropriately qualified ecologist to determine the cause of death or injury	As required	Not Triggered	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

BBMP-006	Impact Trigger for Non-Threatened Species: A total of four or more bird or bat carcasses, or parts thereof, of the same species in two successive searches at the same turbine of a non-threatened species (excluding Sulphur-crested Cockatoos, galahs, crows and ravens and introduced bird species). The <i>Decision Making Framework</i> (Figure 4 of the referenced BBMP) will be implemented.	OEH will be notified of the impact trigger within 7-days  Investigation (to be completed within 3-weeks) by an appropriately qualified ecologist to determine the cause of death or injury	As required	Not Triggered	
BBMP-007	Post-construction bird utilisation surveys by an appropriately qualified ecologist	For a minimum of 2-years post construction	Copy of survey data	Yes	
VMP-001	It is generally recommended that the minimum time frame required to restore a plant community is five years (DNR 2006). It is likely that ongoing, occasional maintenance after this period will be necessary, therefore it is recommended that the early involvement of a local “bush-care group” be actively encouraged.	As needed – on a 5-year basis, subject to results		Not Triggered	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

VMP-002	Hand weeding, cut and paint and spot herbicide spraying will be undertaken, focussing on sections of the creek line where weedy forbs are well established. All weed waste will be bagged, removed and disposed of at an appropriate waste disposal depot	As needed (when weed removal takes place)		Not Triggered	
VMP-003	Implement direct seeding and brush matting	<i>Autumn 2019</i>	Invoice	Yes	
VMP-004	Approximately six months following direct seeding and brush matting, areas with no seedling germination will be subject to supplementary direct seeding and brush matting	6-months after direct seeding	Invoice if triggered	Yes	
VMP-005	During the second year of Operations, tube-stock will be installed in accordance with the prescribed planting scheme and planting densities	12-months to 24-months of commencement of Operations	Evidence of planting / invoice	Yes	
VMP-006	Following plant installation and the application of seed and brush matting, the upper banks will be watered using a utility mounted tank approximately once a week for four weeks and then as required dependant on climatic conditions	Weekly for 4-weeks and then as required		Yes	
VMP-007	Undertake quarterly audits of planted trees. Audit to include photographic records as a measure of success of the planting program. Record mortality (and replacement) rates of planted trees.	Every 3-months after initial planting and for a <i>period of not less than 2-years</i>	Audit report	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

VMP-008	Replace dead or missing plants with equivalents	As needed after each audit		No	
SGW-001	Spill kits provided around the site and inspected to ensure equipment is functional in case of emergency (action also included in the SWP sub-plan)	Monthly	Spill kits in place	Yes	
SGW-002	Inspect areas around Substation bunding for erosion and any evidence of oil being discharged.	Minimum weekly for Erosion and Sedimentation control, and directly after each major rainfall events	Erosion inspection report	Yes	
SGW-003	Inspect areas surrounding construction sites, and all access tracks to ensure no erosion features are developing	Weekly	Inspection report	Yes	
SGW-004	Inspection of Rehabilitation areas to ensure no erosion features have developed	Monthly	Inspection report	Yes	
SGW-005	Implement an action plan to remediate in the event that erosion is detected during inspections	As needed	Action Plan if triggered	Yes	
SWG-006	In the event of a suspected spill or contamination of soil, samples and testing shall be implemented in the event of this occurring	As needed	Sampling results if triggered	Not Triggered	
SWP-001	Weather Forecasts – advise of adverse weather	Daily		Yes	
SWP-002	Water Quality Sampling (in the event of a spill or incident)	As needed	Sampling results if triggered	Not Triggered	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

SWP-003	Environmental Inspection – to include status of floodways, erosion control structures, bunded areas, turbine pads, scouring of disturbed / rehabilitated areas, diversion drains etc and flows in, creeks and channels (action also included in the SGW sub-plan)	Minimum weekly for Erosion and Sedimentation control, and directly after each major rainfall events	Erosion inspection report		
SWP-004	Inspection for spillage or leakage of any stored waste materials (refer WMP-003)	Monthly	Inspection report	Yes	
SWP-005	Vegetation Management (refer OFFMP-001 and OFFMP-002). Where practical, disturbed areas shall be rehabilitated and monitored	Quarterly	See above OFFMP001 & 002	Yes	
SWP-006	Refuelling of assets (vehicles or machinery) will only be allowed in suitably controlled areas or areas where kits are stored (action also included in the SGW sub-plan)	As needed		Yes	
SWP-007	Traffic to be restricted to defined access tracks, construction impact areas, and operational areas (action also included in the SGW sub-plan)	As needed		Yes	
SWP-008	Minimise on-site vehicle use during and after wet weather events (action also included in the SGW sub-plan)	As needed		Yes	



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

SWP-009	Educational training of construction and operational site personnel aimed at erosion and sediment control, vegetation management, waste and spill management at the site during construction, operation and maintenance activities	Monthly	Training Records	Yes	
SWP-010	Inspect waste water treatment for signs of water pooling, liquid discharge, erosion and any other obvious visual defects	Minimum weekly for Erosion and Sedimentation control, and directly after major rainfall events	Erosion inspection report	No	Weekly inspections not appropriate during Operations phase. Recommend monthly inspections
SWP-011	Establish a maintenance agreement with a licensed contractor (certified to ISO14000 standard requirements) to ensure the treatment systems meet design specifications	Within first 3-months of Operations	Evidence of contractor engagement	No	
SWP-012	Complete remaining earthworks and stabilisation of disturbed areas (from construction works)	Prior to March 2019	Completed works	Yes	
SWP-013	Undertake repairs arising from inspections to floodways, erosion control structures, bunded areas, turbine pads, scouring of disturbed / rehabilitated areas, diversion drains etc and flows in, creeks and channels	As needed – based on weekly inspections	Erosion inspection report	Yes	Weekly inspections not appropriate during Operations phase. Recommend monthly inspections

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

SWP-014	Visual monitoring to be undertaken to ensure effectiveness of erosion and sediment control measures	Minimum weekly for Erosion and Sedimentation control, and directly after major rainfall events	Erosion inspection report		Weekly inspections not appropriate during Operations phase. Recommend monthly inspections and directly after major rainfall events
SWP-015	Implement appropriate mitigation measures in the event that erosion and sedimentation controls are found to be deficient	As needed – based on weekly inspections	As required		Weekly inspections not appropriate during Operations phase. Recommend monthly inspections
SWP-016	In the event of a suspected spill contamination of watercourses, additional water quality testing may be required in order to ascertain appropriate corrective treatment measures. Samples and testing shall be implemented in the event of this occurring	As needed	Water sampling results if triggered	Not Triggered	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

CoC-70	The Applicant must, in consultation with the RMS and Council, identify any road safety changes along Crookwell Road (between Pejar Road and the northern boundary of the site).	First 12-months of Operations	Evidence of consultation with Council and RMS	Yes	
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#### EIS Predictions

EIS Predictions						
Reference	EIS Ref	EIS Commitment	Condition of Consent	Evidence Required	Compliant	Effectiveness of Mitigation Safeguard Measures
Landuse	7.6	Site Layout – buffer zones between turbines and residences	Appendix 2	Map	Yes	N/A
		Preparation of detailed environmental management plans	26 27	CEMP OEMP	Yes	The Plans reflect the age of the consent
		Measures to avoid impacts on existing agricultural activities, including gates on access points, and fencing of the substation only, to allow for movement of stock			Yes	
		Off-set planting of vegetation to replace cleared wind break tree lines, in same and new areas, to maintain shelter for livestock and ensure continued existing land uses	36	OLP	Yes	
		Use of existing viewing area, to ensure that visitors are able to park and view the site safely, without impacting traffic on Crookwell Road			Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		Decommissioning and site restoration, once the wind farm has reached the end of its useful life			Not triggered	
Geology, Soils, Hydrogeology	8.4.4	Development and Implementation of SWMP as part of the CEMP and OEMP.	26 27	CEMP OEMP	Yes	Overly detailed plan that reflect construction activities when erosion potential is higher.
		Design and maintenance of site tracks in accordance with appropriate standards, such as DLWC (DIPNR), Landcom, RTA, Fisheries, and State Forest guidelines.	26 27	CEMP OEMP	Yes	Tracks were designed prior to commencement of construction.
		Installation, inspection and maintenance of appropriate sediment control devices, to prevent erosion and sediment discharge to watercourses	26 27	CEMP OEMP	Yes	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities when erosion potential is high.
		Provision and use of appropriate containment facilities for chemical storage in control room / facilities building to prevent discharge to ground	27	OEMP	Yes	
		Regular inspection of disturbed ground, particularly after rain, to ensure sediment control devices are installed / maintained	27 85	OEMP SWMP	Partial	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities when erosion potential is high

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		Maintenance of site tracks to prevent erosion and discharge of sediment from site	27 85	OEMP SWMP	Yes	As required
		Installation and maintenance of appropriate effluent treatment facilities, to meet relevant standards and guidelines, and avoid contamination and erosion.	27 85	OEMP SWMP	Yes	
Hydrology and Surface Water	9.4.3	Track designs, based on relevant guidelines from DLWC, State Forests and RTA, to be best practice and minimise potential erosion and sedimentation.	85 86 87	SWMP ESCP SMP	Yes	Designs done prior to construction
		Creek/ drainage line crossings to be constructed in accordance with best management techniques, based on NSW Fisheries guidelines	85 86 87	SWMP ESCP SMP	Yes	Designs done prior to construction
		Minimal on-site vehicle use during and after wet weather events.	85 87	SWMP SMP	Yes	All roads are all weather
		Traffic to be restricted to defined access tracks, construction impact areas, and operational areas	85 86 87	SWMP ESCP SMP	Yes	
		Regular inspection of erosion control structures and bunded areas.	85 86 87	SWMP ESCP SMP	Partial	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities. Inspection requirements need to be integrated into onsite operational management activities.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		Regular inspections of areas surrounding turbine sites, substation and all access tracks to ensure no erosion features are forming.	85 86 87	SWMP ESCP SMP	Partial	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities. Inspection requirements need to be integrated into onsite operational management activities.
		Timely and appropriate disposal of accidental spills and any contaminated spoil, water or waste generated.	85 87	SWMP SMP	Yes	
		Spill kits are to be provided on site, for both construction and operation phases, and refuelling will only be allowed in areas where kits exist.	85 87	SWMP SMP	Yes	
		Regular inspection of the track network and drainage line crossings to ensure no erosion features are developing, particularly after any rainfall event.	85 86 87	SWMP ESCP SMP	Yes	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities. Inspection requirements need to be integrated into onsite operational management activities.
		Regular inspection / maintenance of all rehabilitation work sites to ensure that revegetation has been established as planned and that no erosion features have developed.	85 86 87	SWMP ESCP SMP	Partial	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

						construction activities. Inspection requirements need to be integrated into onsite operational management activities.
		Development of an action plan as part of the inspection program and the broader Soil and Water Management Plan which would be initiated in the event that a gully erosion feature is identified during a regular inspection.	85 87	SWMP SMP	Yes	Weekly inspections are no longer appropriate as the roads are stable. The requirements reflect construction activities. Inspection requirements need to be integrated into onsite operational management activities.
		Development and implementation of an emergency response plan in the event of an accidental fuel, oil, or other material spill including mitigation measures should the spill not be able to be contained on site.	85 87	SWMP SMP	Yes	
		Selection of a propriety wastewater treatment system which does not allow any external release of effluent.	85 86 87	SWMP ESCP SMP	Yes	
		Selection of an oil-water separator, using latest best practice in the industry, based on Energy Australia and TransGrid practices.	85 86 87	SWMP ESCP SMP	Yes	No observations of oil in substation area.
		Final selection of locations for wastewater treatment plant and oil / water separator to be a minimum of 100 metres from any permanent creek	85 86 87	SWMP ESCP SMP	Yes	Undertaken during design.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		or river and 40 metres from any drainage depression.				
		Installation of dedicated material storage area in facilities building, to provide containment for any spills during maintenance activities.			Yes	Bunded storage container Spill kits on site
		Ensure any discharge of stormwater from the transformer bund in the substation is at low velocities sufficient not to cause erosion downslope of the site	87	SWP	Yes	Nil discharges recorded
		Establish a maintenance agreement with a licenced contractor (certified to ISO14000 standard requirements) to ensure the treatment systems meet design specifications.	87	SWP	No	ISO14000 standard not applicable for onsite effluent disposal certification.
		Development of an emergency response plan in the event of an accidental failure of treatment systems.	85	SWMP	Yes	PIRMP in place.
Landscape and Visual	10.7.5	Plant and maintain screening vegetation in vicinity of substation.	36 37	OSLP RSLMP	Yes	
		Minimise activities that may require night time lighting, and if necessary use low lux lighting designed to be mounted with the light projecting inwards to the site to minimise glare at night			Yes	Ni night time activities undertaken during operations
		Maintain revegetation of disturbed areas to ensure effective cover achieved	27 83	OEMP OFFMP	Yes	
		Undertake revegetation and off-set planting at areas around the site in consultation and agreement with landholders, to off-set removal of	27 83	OEMP OFFMP	Yes	



Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		some wind break trees on the site, to maintain visual character of the site.				
Flora and Fauna	11.63	Prepare a Flora and Fauna Management Plan as part of the EMP to implement the identified management measures and coordinate the monitoring programs over the first 12 months of operations (based on AusWEA's Best Practice Guidelines (2002)), and to monitor water quality, vegetation regeneration, weed and pest animal control	27 83 36 37	OEMP OFFMP OSLP RSLMP	Yes	
		Revegetate disturbed areas as soon as possible after construction works, using endemic species to supplement and enhance local ecological values. Monitor vegetation for native plant regeneration and weed infestations, and control weeds as observed	27 83 36 37	OEMP OFFMP OSLP RSLMP	Yes	
		Provide and manage containment for all oils on site, including transformer oils and materials in storage for maintenance, to prevent any discharge to ground.			Yes	Undertaken during BBAMP implementation.
		Undertake monitoring survey for waterbirds when nearby lakes become full, to identify potential hazardous turbine sites and hence any requirement for additional deterrent measures (in conjunction with carcass surveys)	27 83 84	OEMP OFFMP BBAMP	Yes	Undertaken during BBAMP implementation.
		Undertake background monitoring bat surveys at several sites, within and away from the wind farm site, over 12 month period to assess wind farm	27 83 84	OEMP OFFMP BBAMP	Yes	Background monitoring was undertaken during development.

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		impact in medium term (to include pre-commissioning surveys in spring 2004 and autumn 2005)				Operational monitoring undertaken during BBAMP implementation
		Undertake post-commissioning bat monitoring over first 24 months of operation, to assess impacts in comparison with base data	27 83 84	OEMP OFFMP BBAMP	Yes	Operational monitoring undertaken during BBAMP implementation
		Site staff to monitor bird and bat strike during first 12 months of wind farm operation via carcass searches at base of turbines, to consider operational impacts and requirement for on-going monitoring and / or additional mitigation measures. Assessment to be completed in conjunction with DEC.	27 83 84	OEMP OFFMP BBAMP	Yes	Operational monitoring undertaken during BBAMP implementation
		Avoid fencing on site, other than for substation and gates installed on access points to avoid creating barriers to movement of livestock and other site fauna.			Yes	All fencing has been completed prior to operations
		Implement management measures to avoid impacts between construction activities and transport, and site livestock, e.g. temporary barriers on open excavations, speed limits for site traffic, gates on access points		Induction	Yes	Livestock management has priority of movement on site.
Noise	12.7.3	Develop and implement a Noise Management Plan as part of the EMP that incorporates noise mitigation measures for construction works and operation, to include Community Consultation and procedures for investigating and responding to	27 48	OEMP Operational Noise Criteria	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		complaints, e.g. monitoring and management measures				
		Finalise and implement developer agreements with identified on- and off-site landowners, to form basis for potential higher noise levels	48	Operational Noise Criteria	Yes	
		Undertake detailed noise assessment and monitoring exercise during commissioning to develop management procedure for operating turbines in low noise mode	50 51	Noise Compliance Strategy Noise Monitoring	Yes	
		Ensure site inductions cover the importance of noise control and available noise reduction measures		Induction	Yes	
		In the event of noise complaints, agree approach for monitoring in order to determine the noise emission levels and to aid the selection of additional noise controls where necessary	27	OEMP App 3	Yes	
Meteorology and Air Quality	13.6	Restrict construction traffic, where possible, to defined tracks and implement a speed limit.	27	OEMP	Yes	
		Maintain site tracks to a suitable standard to minimise deterioration and damage over time.	27	OEMP	Yes	
Traffic and Transportation	14.6.4	Development and implementation of specific Traffic Management Plan (TMP), for management of all traffic issues, including transportation of equipment to site, construction traffic and maintenance traffic.	56	TMP	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		Implementation of controls in TMP to manage traffic on and off-site to minimise impacts on local traffic flows and impacts on site.	56	TMP	Yes	
		Program of road inspection prior to use, and on-going monitoring during activities, to ensure access roads and site tracks are maintained in safe and adequate condition, with prior agreements with authorities on relevant responsibilities.	56 59	TMP Dilapidation Report	Yes	
Heritage and Archaeology	15.8.3	Revision and completion of draft Cultural Heritage Management Plan, in consultation with DEC and the Pejar LALC, to form the basis for management of all cultural heritage issues, included in the site EMP	74	HMP	Yes	
		Protection of nominated sites not subject to a S87 or S90 by appropriate means, such as staff training, mapping and recording, specifying 'out of bound' areas	74	HMP	Yes	
		Ensure that site inductions are provided to all site personnel to increase awareness of identification and protection of archaeological artefacts		Induction	No	
		Ensure vehicles are confined to a defined tracks and set speed limits within the construction impact zone.	85 86 87	SWMP ESCP SMP		
Hazards and Risks	17.9	Preparation and implementation of a Bushfire Management Plan, as part of site EMP	27	OEMP	Yes	This is appropriate during construction however during operations it is not. The wind farm operator is not a fire fighting agency. It

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

						more appropriate that they consult with the local RFS including a site visit so that the RFS can develop their own plan.
		Management of all 'hot work' activities		Induction	No	
		On-going vegetation management				
		Development and implementation of a site health & safety plan, for construction and operation activities		Safety Management Plan	Yes	
		Compliance with relevant standards for electrical safety and electromagnetic emissions for equipment design, installation and maintenance			Yes	
		Use of existing viewing area to ensure visitors do not create traffic hazard on Crookwell Road				
Energy and Greenhouse	18.5	Design the site with efficient internal road networks to minimise delays and allow access from both sides of the wind farm.	85 86 87	SWMP ESCP SMP	Yes	
		Switch off the engines of trucks while they are waiting to access the site and while they are being loaded or unloaded.	56	TMP	Yes	
		Ensure equipment is properly maintained to ensure efficient energy consumption.	27 56	OEMP TMP	Yes	
		Switch off site office equipment and lights after hours and using minimal lighting intensity for security purposes.	27 56	OEMP TMP	Yes	

Crookwell 2 Wind Farm DPE Independent Compliance Audit	24 June 2022
Global Power Generation Australia Pty Ltd	Rev C

		Regularly maintain equipment to ensure it remains in good condition.	27 56	OEMP TMP	Yes	
		Use recycled materials and recycle materials (demolition materials, construction materials, paper, glass, etc), where feasible.				Waste is separated for recycling
Electromagnetic Interference	19.7	Assessment of impacts, in event of reported interference issues			Not triggered	
		Implementation of mitigation measures – aerial modification – aerial relocation – alternative TV connection as appropriate.				