

INDEPENDENT ENVIRONMENTAL AUDIT REPORT

BODANGORA WIND FARM

Proponent: Infigen Energy

July 2018

Document Revision Record

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Independent Environmental Audit – Bodangora Wind Farm

1. Introduction:

1.1. Scope and audit objectives

J2M Systems Pty Ltd was engaged by Infigen Energy Pty Ltd (Infigen) to undertake an Independent Environmental Audit (IEA) under Project Approval 10_0157 MOD4 as modified (the approval) for the Bodangora Wind Farm Project. This audit was conducted to address Condition D8 of Schedule D of the Approval.

In accordance with Condition 8 of Schedule D of the approval, the objectives of this IEA were to:

- assess whether the project complies with the relevant requirements in the approval and any strategy, plan or program required under this approval; and
- recommend appropriate measure or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under the approval.

Additionally, in accordance with New South Wales (NSW) Department of Planning and Environment (DPE) letter dated 18/04/2018 re: endorsement of IEA auditor, the objectives of this IEA were also to:

- review the adequacy of plans and programs required under the approval.

The audit period is defined as the period since Project Approval to the date of this audit, with the focus being on the period since commencement of construction in July 2017.

The scope of the audit included the requirements of:

- NSW DPE Project Approval 10_0157 MOD4; and
- NSW Environmental Protection Authority, Environmental Protection Licence No. 20927.

Works subject to this audit included:

- internal track construction;
- civil works associated with the construction of the foundations for the wind turbine footings;
- underground cabling;
- transmission line clearing;
- public road construction; and
- site compound.

1.2. Environmental audit team

The environmental audit was conducted by Peter Marshman, Lead Environmental Auditor, of J2M Systems Pty Ltd. Peter was approved by DPE on 18 April 2018 as having the necessary skills and qualifications to undertake the audit.

2. Project background

Section 1.2 of the Construction Environmental Management Plan (NGH Environmental, June 2018) states “Bodangora Wind Farm Pty Ltd (BWFPL), a subsidiary of Infigen Energy Development Pty Ltd, received planning approval for a wind farm and ancillary infrastructure at Bodangora, in the Central Western Region of NSW (Refer to Figure 1 below).

Bodangora Wind Farm is a State Significant Development project and environmental initiative that represents an important contribution to renewable energy generation in NSW. The project will provide an additional 333 Gigawatt hours (GWh) per year of renewable energy to the National Electricity Market. It is expected that Bodangora Wind Farm will significantly assist in reducing the greenhouse gas emission of NSW’s electricity generation. The wind farm provides an additional energy source for retailers seeking to meet the obligations of the Federal Government’s Renewable Energy Target (RET) Scheme. The RET Scheme mandates that over 33000 GWh/year of renewable energy be generated by 2020”.

Bodangora wind farm is being built under an engineering, procurement and construction (EPC) contract by a consortium comprising General Electric (GE) and Civil & Allied Technical Construction (CATCON). The project construction time is approximately 18 months and full commercial operation is targeted to be in the second half of 2018.

3. Site Location

The Bodangora Wind Farm is approximately 340km North West of Sydney, NSW.



Figure 1: Site location map.

4. Audit Methodology

4.1. Introduction

The processes for this IEA involved a review of documentation (plans, programs, statutory requirements), as well as a site inspection and audit interviews with Infigen and CATCON site management team to determine the level of environmental performance and compliance with requirements.

Planning

All relevant and publically available documentation relating to the project was identified and downloaded for review. Discussions were held with the Infigen Energy Health, Safety and Environmental Manager regarding the currency of these documents and the availability of site records to demonstrate compliance. During the planning phase, relevant Government agencies were consulted to identify any specific issues or information they believe should be considered as part of the audit.

Document Review

Prior to the audit site inspection, relevant documentation obtained during the planning phase, was reviewed (desktop) and a compliance checklist was established. The review also considered the adequacy of these plans (refer to section 7 of this report).

The following management plans were reviewed and considered during this audit:

- Project Approval 10_0157 MOD 4
- Environmental Protection Licence (EPL) 20927
- Bird and Bat Adaptive Management Plan
- Construction Environmental Management Plan
- Construction Compound and Ancillary Facilities Management Plan
- Construction Noise and Vibration Management Plan
- Construction Traffic and Access Management Plan
- Construction Soil and Water Management Plan
- Construction Heritage Management Plan
- Construction Biodiversity Management Plan
- Construction Air Quality Management Plan
- Compliance Tracking Program
- Biodiversity Offset Package

Audit Site Inspection and Interviews

The audit inspection and interview process was planned over a two-day period. The process was planned to include an opening meeting on the first day, followed by interviews and review of records to clarify matters of compliance, as well as a site inspection (by foot and vehicle) to review key site based activities. A closing meeting was also planned and held at the end of the second day on site to confirm audit findings as identified at that point in time.

Report Preparation

Audit notes and evidence obtained during the site inspection was consolidated and into this report and its associated audit checklist.

5. Consultation with relevant agencies and audit response

As part of the audit process, J2M Systems consulted with the following key government agencies to gain an understanding of their interests in the Bodangora Wind Farm Project and its environmental performance. This section provides a summary of this consultation.

5.1. NSW Department of Planning and Environment (NSW DPE)

Email requesting consultation issued to DPE (17/05/2018) and the following provides a summary of the response received:

- *“We would like you to specifically look at the following:*
 - a. *Traffic management and site security*
 - b. *Provide a focus on compliance with Schedule B and Schedule F, and any conditions relevant in the operational phase of the project for which preparation in the construction phase is critical.*
 - c. *Two non-compliances were identified by/notified to the Department in 2017*
 - i. *one being the damage to the archaeological site (Penalty Notice issued 2018); and*
 - ii. *the other being the failure to construct the Gillinghall/Goolma Road intersection prior to construction (Official Caution issued 2018). Please confirm progress.*
 - d. *Erosion and sediment controls need to be checked.*
 - e. *Siting of wind turbines within approved microsite.*
 - f. *Protection of areas as identified on the constraints map.*
 - g. *Implementation of monitoring programs.*

Auditor response:

The auditor considered the consultative request and provides the following response:

- a) No site security issues were identified during audit site inspection. Traffic controls, including road hazard signage and traffic cones, were observed in prominent road side locations during the audit site inspection. Traffic management was considered under the Project Approval Compliance Checklist – Condition E16. Refer to Appendix 1.
- b) Each condition of the Project Approval was assessed during this audit. Refer to notes in the Project Approval Compliance Checklist - Appendix 1.
- c) Refer to Project Approval Checklist – Appendix 1:
 - i. *Condition E2: Work is continuing to address and close out the heritage non-compliance. Refer to section 5.4 below also for further details.*
 - ii. *Condition E16. A non-conformance was identified with regard to this condition. In summary, the Gillinghall/Goolma Road intersection has been constructed and approval by NSW RMS, subject to a 24 month warranty period to apply.*
- d) Refer to Project Approval Checklist Conditions E13 and E21(d). A non-compliance was raised during this audit with regard to erosion and sediment controls.
- e) Refer to Project Approval Checklist – Appendix 1, Condition B17. No non-compliance was identified against this condition. .
- f) The Aboriginal Cultural Heritage Stone Quarry and the Kaiser Mine area were inspected and observed to be cordoned off with bunting and signage to restrict access to these areas.
- g) Monitoring programs associated with the relevant environmental management plans was considered during the audit and notes are recorded within the Audit Checklist.

5.2. NSW Environmental Protection Authority (NSW EPA)

Email requesting consultation issued to NSW EPA (17/05/2018).

- *No response received.*

5.3. Dubbo Regional Council

The auditor spoke (telephone) with a Planning Officer from Dubbo Regional Council and followed up with an email (17/05/2018) as requested.

- *No response received.*

5.4. WVVAC CEO & Contact Officer

Email requesting consultation issued to WVVAC (21/05/2018) and the following provides a summary of the response received:

- *Thank you for your email around the audit. There has been an incident in regards to damage to an Aboriginal Cultural Heritage Stone Quarry which was reported to OEHL by Infigen on 12.12.2017 the day before the compliance officer was due to have a Scheduled onsite inspection.*

Auditor response:

The auditor considered this consultation to be provision for information only and this was reviewed as part of the Project Approval Compliance Audit Checklist – Refer to Condition E2. NSW DPE issues a *Penalty Notice with regard to this issue.*

The Infigen compliance tracker, April 2018, states the following:

“ Condition D6 & D7: 4/4/18: The DPE was notified on 12/12/18 about an incident at location SU18/L1 within the site and followed the process identified in the CEMP and as required by this Condition. The incident has been investigated and was closed out by DPE on 7/3/18. A corrective action plan has been submitted to DPE” ...

Condition E2 “4/4/2018: the incident at cultural heritage location SU18/L1 identified under Conditions D6 and D7 above has been investigated by the DPE and the EPC Contractor received a non compliance notice. The contractor is in the process of implementing remedial actions and the site is now fully fenced off with signage”.

Works contractor CATCON provided a letter to NSW DPE, dated 06/04/2018, in response to the DPE Letter and penalty notice, dated 07/03/201. The CATCON Letter outlines a plan of works to address the non-conformance (in accordance with DPE requirements).

Following this, NSW DPE issued a letter to Infigen requesting an update to the work plan be submitted by 28 June 2018.

Subsequently, CATCON issued a letter to NSW DPE dated 28/06/2018 that provides a summary of works to date, including a summary of consultation with Aboriginal stakeholders.

6. Compliance with Relevant Requirements

In accordance with Clause D8 (c) of the Approval, this section provides an assessment of the project's compliance the relevant requirements in the approval and any strategy, plan or program required under the approval. A summary of approvals and licences under the scope of this audit is provided in Table 3.

Table 1: Summary of Approvals and Licences

Authority	Requirement Type	Current Revision	Expiry / Review date
NSW DPE	Project Approval DA 10_0157 Mod 4	Modification 4 December 2017	-
NSW EPA	Environmental Protection Licence No. 20927	29 June 2017	29 June 2022

Section 9 of this report lists the conditions considered to be non-compliant, whilst Appendix A presents the status of environmental performance in respect of each condition of the Approval and EPL.

7. Review of Adequacy of Project Management Plans

An adequacy review of the current project environmental management plans was conducted as part of the desktop planning process of this audit. It is noted that many of these documents have recently been updated for Mod 4 and are currently with the DPE for approval.

7.1. Environmental Management Plan.

A project environmental management plan (PEMP) was prepared by NGH Environmental between December 2017 and June 2018. The final plan was established 28/06/2018 (v1.0) and is available on the project website. The PEMP was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CEMP is included in Appendix M of the CEMP.

Recommendations

The auditor identified the following recommendations for improvement in the EMP:

- Could not locate details as to how weather monitoring (refer to EPL 20927 Condition M2) will be undertaken.
- The CEMP and associated sub plans do not clearly define what inspections will be undertaken. It is recommended that the CEMP include a section/or appendix that summarises all inspections and monitoring to be undertaken on the project (i.e. type, frequency, responsibility, record).

7.2. Bird and Bat Adaptive Management Program

The Bodangora Wind Farm Bird and Bat Adaptive Management Program was prepared by Brett Lane and Associates, in consultation with OEH and Infigen. The current plan was established June 2018 and is available on the project website. The BBAMP was submitted to and approved by NSW DPE letter dated 07/06/2017. Page 3 of the BBAMP states that BL&A and Infigen consulted with NSW OEH in the development of the plan. No further evidence was sighted during the audit. The majority of control measures within the program relate to either pre or post construction. The BBAMP appears adequate and no recommendations for improvement were identified during this review.

Recommendations

The auditor identified the following recommendations for improvement in the BBAMP:

- Nil.

7.3. Construction Compound and Ancillary Facilities Management Plan.

The Construction Compound and Ancillary Facilities Management Plan was prepared by NGH Environmental between April 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CCAFMP is included in the last page of the CCAFMP.

Recommendations

The auditor identified the following recommendations for improvement in the CCAFMP:

- The date of Revision Final v1.0 in the document verification table (page 1) is incorrect.
- ~~The CCAFMP has not been updated to include the location of the concrete batch plant, crushing and screening plant, stockpile locations, satellite laydown areas and the operations & maintenance facility.~~

7.4. Construction Noise and Vibration Management Plan.

The Construction Noise and Vibration Management Plan was prepared by NGH Environmental between January 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved

by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CNVMP is included in Appendix E of the CNVMP.

Recommendations

The auditor identified the following recommendations for improvement in the CNVMP:

- Nil.

7.5. Construction Traffic and Access Management Plan.

The Construction Traffic and Access Management Plan (CTAMP) was prepared by NGH Environmental between February 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CTAMP is included in Appendix B and C of the CTAMP. The matters raised by Dubbo Regional Council and DPE appear to have been addressed in the final plan.

Recommendations

The auditor identified the following recommendations for improvement in the CTAMP:

- Nil.

7.6. Construction Soil and Water Management Plan.

The Construction Soil and Water Management Plan (CSWMP) was prepared by NGH Environmental between January 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CSWMP is included in Appendix I of the CSWMP. The matters raised by Dubbo Regional Council and DPE appear to have been addressed in the final plan. Detailed erosion sediment control plans (ERSED) and environmental work method statements (EWMS) support the CSWMP.

Recommendations

The auditor identified the following recommendations for improvement in the CSWMP:

- Table 3-1 has not been updated to reflect Project Approval MOD 4, December 2017.
- Table 3-1 does not identify condition C8. or C9, that relate to water quality.
- The dewatering turbine foundations procedure in Appendix C of the CSWMP does not identify responsibilities for or process steps as to how water would be treated and tested prior to discharge if required.
- Inspections post rainfall is vague and no evidence was observed during the audit.
- Review and revise Section 8.3 Monitoring and Inspection in line with Condition O4.1 of EPL No. 20927.
- Update Section 8.3 to include responsibilities for the inspections and details on what records are to be maintained as a result of monitoring and inspection.

7.7. Construction Heritage Management Plan.

The Construction Heritage Management Plan (CHMP) was prepared by NGH Environmental between January 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CHMP is included in Appendix D of the CHMP. The matters raised by OEH appear to have been addressed in the final plan.

Recommendations

The auditor identified the following recommendations for improvement in the CHMP:

- Nil

7.8. Construction Biodiversity Management Plan.

The Construction Biodiversity Management Plan (CBMP) was prepared by NGH Environmental between January 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CBMP is included in Appendix L of the CBMP. The matters raised by OEH appear to have been addressed in the final plan.

Recommendations

The auditor identified the following recommendations for improvement in the CBMP:

- The CEMP and associated sub plans do not clearly define what inspections will be undertaken. It is recommended that the CEMP include a section to summarise all inspections and monitoring to be undertaken on the project (i.e. type, frequency, responsibility, record). For example, the CBMP does not reference the use of the pre-clearing checklist.
- Table 6-1 refers to a pre-clearing procedure however this is not included in the CBMP. Note the following are included: Appendix A Pre-Clearing Checklist, Appendix B Tree Clearing Procedure, and Appendix C Vegetation Clearance Procedure. Table 6-1 could be updated to reference these procedures currently within the CBMP.
- Appendix C refers to a Hollow bearing tree removal procedure however this is not included in the CBMP.

7.9. Construction Air Quality Management Plan.

The Construction Air Quality Management Plan (CAQMP) was prepared by NGH Environmental between January 2017 and June 2017. The current plan (Final v1.0) was submitted to and approved by NSW DPE, letter dated 28/06/2017. Evidence of consultation with relevant agencies with regard to the CAQMP is included in Appendix B of the CAQMP. The matters raised by NSW EPA and NSW DPE appear to have been addressed in the final plan. Monitoring and inspection requirements are clearly determined in Table 9-1 of the management plan.

Recommendations

The auditor identified the following recommendations for improvement in the CAQMP:

- It is recommended that the monitoring requirements table (Table 9-1) in the CAQMP be used as the template for all other management plans.

7.10. Compliance Tracking Program.

A Compliance Tracking Program (CTP) was prepared by Infigen (July 2017) and was submitted to and approved by NSW DPE, letter dated 30/06/2017.

Recommendations

The auditor identified the following recommendations for improvement in the CAQMP:

- The CTP has not been updated to reflect MP 10_0157 Modification 4, including for incident notification (Condition D8), non-compliance notification (Condition D9) and independent environmental audit (Condition D10).

7.11. Biodiversity Offset Package.

A Biodiversity Offset Package (BOP) was prepared by Infigen between October 2017 and February 2018. The BOP was initially submitted to and approved by NSW DPE, letter dated 3/10/2017 subject to the securing the offset in perpetuity. In accordance with the monitoring, inspection and reporting schedule identified in Table 9-1 of the BOP, the majority of actions are due post 30 June 2018.

Recommendations

The auditor identified the following recommendations for improvement in the BOP:

- Nil.

8. Summary of Findings against the Project Approval

Project Approval:

Overall this audit identified wide-ranging compliance against the majority of the conditions of Project Approval with records requested readily available, legible and complete.

This audit identified four (4) non-compliances across seven (7) conditions of the project approval. A further six (6) Opportunities for Improvement were identified across seven conditions of the project approval.

Definition of Compliance Status

NC	Non-compliant – Recommendation identified.
OFI	Opportunity for improvement – Recommendation identified.

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	Operating Conditions			
C1	<p>The Proponent must:</p> <p>(A) ensure that no more than 1.32 hectares (ha) of native vegetation is cleared for the Project, unless the Secretary agrees otherwise;</p> <p>(B) minimise:</p> <ul style="list-style-type: none"> • impacts on hollow-bearing trees; • impacts on threatened bird and bat populations; and <p>the clearing of native woodland vegetation and fauna habitat</p>	<p>Opportunity for Improvement: The Auditor notes that the BOP available on the project website is BOP Version 2, 22/02/2018. The version history of this plan is below and appears inconsistent with the above approval:</p> <ul style="list-style-type: none"> • Draft 1.0 12/10/2017 • Final 1.0 12/02/2018 • Final 2.0 23/02/2018. <p>Opportunity for Improvement: There are no details on when and who will complete the pre-clearing checklist provided in Appendix A of the Construction Biodiversity Management Plan.</p>	OFI	<p>RECOMMENDATION:</p> <ol style="list-style-type: none"> 1. Infigen to clarify the version history and ensure the BOP available on the project website and implemented on site is the approved version of the plan. 2. Consideration to be given to revising the Construction Biodiversity Management Plan to reference the pre-clearing checklist and outlining the requirements for its use.

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	Hazards and Risk			
C11	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997). In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	<p>OPPORTUNITY FOR IMPROVEMENT: Self bundled pallets were observed in numerous locations within the compound and were exposed to the elements.</p>	OFI	<p>RECOMMENDATION: Consideration to be given to conducting a risk assessment and considering the risks and opportunities for centralising the storage of substances and providing a sheltered location in accordance with the NSW EPA Bunding and Spill Management Guidelines.</p>
	Waste Management			
C31	<p>The Proponent shall ensure that all liquid and/ or non-liquid waste generated on the site is assessed and classified in accordance with Waste Classification Guidelines (DECC, 2008), or any future guideline that may supersede that document, and where removed from the site is only directed to a waste management facility lawfully permitted to accept the materials.</p>	<p>OPPORTUNITY FOR IMPROVEMENT: Waste register is limited, as it does not include volume of waste or easily identified classification.</p>	OFI	<p>RECOMMENDATION: The register tracking waste removal off site could be improved by capturing the type, volume and disposal location. Record (receipt) of disposal at licenced facilities could be also be maintained.</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	Heritage			
E2 & E21(e)	<p>In undertaking the Project, impacts to heritage, shall to the greatest extent practicable, be avoided and minimised. In particular:</p> <p>a) clearly identify and avoid the stone procurement artefact area (SU18/L 1), and the Kaiser Mine, and include methods for restricting access to these sites as part of the Construction Heritage Management Plan required by condition E21(e); and</p> <p>where impacts as assessed in the EA are unavoidable, works shall be undertaken in accordance with the strategy outlined in the Construction Heritage Management Plan required by condition E21 (e).</p>	<p>NON-COMPLIANCE: Infigen compliance tracker, April 2018, states the following:</p> <p><i>“ Condition D6 & D7: 4/4/18: The DPE was notified on 12/12/18 about an incident at location SU18/L1 within the site and followed the process identified in the CEMP and as required by this Condition. The incident has been investigated and was closed out by DPE on 7/3/18. A corrective action plan has been submitted to DPE” ...</i></p> <p><i>Condition E2 “4/4/2018: the incident at cultural heritage location SU18/L1 identified under Conditions D6 and D7 above has been investigated by the DPE and the EPC Contractor received a non compliance notice. The contractor is in the process of implementing remedial actions and the site is now fully fenced off with signage” .</i></p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - CATCON letter 06/04/2018 to DPE responding to the DPE Letter and penalty notice (07/03/2018), that outlines a plan of work to address the non-conformance (in accordance with DPE requirements). • CATCON incident report 891-026, dated 08/12/17. No bunting installed. <p>DPE Letter to Infigen with Re: Penalty Notice requesting a work plan submitted by 28 March 2018.</p>	NC	<p>RECOMMENDATION: Continue progressing corrective actions in response to the NSW DPE Penalty Notice.</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
		28/06/2018 letter from CATCON to DPE re: heritage works plan update – summary of works to date, including summary of consultation with Aboriginal stakeholders.		
	Construction Noise and Vibration			
E8	<p>The Proponent shall ensure that any blasting carried out during construction of the project does not exceed the criteria in Table 1.</p> <p>Residence on privately owned land:</p> <ul style="list-style-type: none"> 0% Allowable exceedance for 120dB(LinPeak) airblast overpressure and 10mm/s Ground vibration <p>5% of total number of blasts over a 12 month period for 115dB(LinPeak) airblast overpressure and 5mm/s Ground vibration</p>	OPPORTUNITY FOR IMPROVEMENT: Calibration record for the vibration monitor was not available at the time of the audit.	OFI	RECOMMENDATION: Consideration for Infigen to request calibration for the monitor used in blast monitoring (TM Serial Number 4037).
	Soil Water Quality and Hydrology			
E13 & E21(d)	<p>The Proponent must:</p> <p>a) ensure the wind turbine pads, ancillary</p>	NON-CONFORMANCE: Whilst evidence of sediment and erosions controls was observed on site during the audit site inspection, the	NC	RECOMENDATION: CATCON to re-assess existing and planned areas with exposed soils and determine corrective

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>infrastructure, access roads and any other land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions, to minimise erosion and control sediment generation;</p> <p>b) ensure all waterway crossings are constructed in accordance with the:</p> <ul style="list-style-type: none"> • Water Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and • Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version; <p>c) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version;</p> <p>d) ensure the concrete batching plants and substation are suitably bunded; and</p> <p>minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.</p>	<p>auditor observed numerous instances where existing controls, or lack there of, were inconsistent with the requirements of Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008). Non-compliance observed include:</p> <ul style="list-style-type: none"> • Areas of site with exposed soils and no sediment and erosion controls. • Areas of site with exposed soils and only minimal sediment and erosion controls. • Areas of site with in adequately installed sediment and erosion control. • Lack of progressive sediment erosion control plans (as specified by CEMP). 		<p>actions and future controls required to address compliance with the requirements for Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008) on sites. Controls currently listed within the Sediment and Erosion Control Plan are to be re-visited and implemented, including provision of progressive sediment erosion control plans specific to work areas and the implementation of controls listed in these plans.</p>
	Traffic and Transport Impacts.			
E16 & E21 (c)	Unless otherwise agreed by the Secretary, the Proponent shall commission an independent, qualified person or team to undertake the following in	<p>Non-Compliance: NSW DPE Compliance Report, February 2018 provides the following summary: <i>“Official Caution issued to Civil and Allied</i></p>	NC	<p>Recommendation: Works to address this non-compliance are complete. Sighted RMS sign off, dated 23/03/2018, of completed corrective action with</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>consultation with the relevant road authority:</p> <p>a) prior to the commencement of construction, review the proposed route and existing access provisions to the Wind Farm site to determine whether the route and existing provisions allow for safe access of construction and operational vehicles associated with the Project (including appropriate site distances [specifically at the intersection of Goolma Road and Gillinghall Road], appropriate setback of gate(s) at property entry and exit locations to ensure safety for other road users and provisions for over-mass or over-dimensional transport and safety with other road users). Where improvements or changes to the proposed route are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent; and</p> <p>b) assess all roads proposed to be used for over-mass and/ or over-dimensional transport (including intersections, bridges, culverts and other road features) prior to the commencement of construction to determine whether the existing road condition can accommodate the proposed over-mass and/or over-dimensional haulage. Where improvements are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent.</p> <p>Upon determining the haulage route(s) for construction</p>	<p><i>Technical Construction Pty Ltd (Bodangora Wind Project, Project Approval 10_0157, Dubbo Regional Council LGA)</i></p> <p><i>On 9 February 2018, the Department issued an Official Caution to Civil and Allied Technical Construction Pty Ltd (CATCON) for failing to upgrade the intersection of Gillinghall and Goolma Roads prior to the commencement of construction. The Department's investigation identified that construction activities had commenced on site and the intersection upgrade had not been completed. Without the road upgrade, there were potential safety and capacity issues at the intersection. The intersection upgrade works have now been completed, subject to warranty period".</i></p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE Compliance Report, February 2018, including above summary of official caution. • TDG Traffic Study, July 2017. (TDG Ref: 14638 ts-final v3. Which assessed the proposed route, road dilapidation survey and traffic assessment. • REX J Andrews Engineered Transportation Traffic Management Plan V02 12/12/17, that identifies requirements on the route. • Major WAD signed RMS for the Gillingham and Goolma Road Intersection. • RMS Accepted drawings for the Goolma Road – Gillinghall Road 		<p>requirement for 24-month warranty period.</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>vehicles associated with the Project, and prior to construction, undertake a Road Dilapidation Report. The Report shall assess the current condition of the road(s) and describe mechanisms to restore any damage that may result due to traffic and transport related to the construction of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage.</p> <p>Within three months of completion of construction, a subsequent Report shall be prepared to assess any damage that may have resulted from the construction of the Project (including mechanisms to restore any damage) and submitted to relevant road authority for review.</p> <p>Measures undertaken to restore or reinstate roads affected by the Project shall be undertaken in accordance with the reasonable requirements of the relevant road authority (including timing requirements), and at the full expense of the Proponent.</p>	<p>Intersection Upgrade – Accepted for construction 08/02/2018 by R.C. RMD Western Project Engineer.</p> <ul style="list-style-type: none"> • NSW RMS approval to commence construction within the State Road Reserve (SF2017/249220/1) dated 12/02/2018. • CATCON Non-conformity Report 14/03/2018 regarding the finished road. <p>Client (RMS) sign off, dated 23/03/2018, of completed corrective action with requirement for 24 month warranty period.</p>		
	Ancillary Facilities			
E17	<p>Unless otherwise approved by the Secretary, the location of Ancillary Facilities shall:</p> <ol style="list-style-type: none"> be located more than 50 metres from a waterway; be located within or adjacent to the Project; have ready access to the road network; be located to minimise the need for heavy vehicles to travel through residential areas; be sited on relatively level land; be separated from nearest residences by at least 200 metres; 	<p>Opportunity for improvement: The most current AFMP (005 & 006) are not currently included in the CEMP, however it is noted that this is CEMP (Rev 3) is currently submitted to the Department for approval. The approved AFMP are to be included in the CEMP post approval.</p>	OFI	<p>Recommendation: The approved AFMP (005 and 006) are to be included in the revised CEMP post approval by NSW DPE.</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>g) not require vegetation clearing beyond that already required by the Project;</p> <p>h) not impact on heritage sites (including areas of archaeological sensitivity) beyond those already impacted by the Project;</p> <p>i) not unreasonably affect the land use of adjacent properties;</p> <p>j) be above the 20 ARI flood level unless a contingency plan to manage flooding is prepared and implemented; and</p> <p>k) provide sufficient area for the storage of raw materials to minimise, to the greatest extent practical, the number of deliveries required outside standard construction hours.</p> <p>The location of the Ancillary Facilities shall be identified in the Construction Environmental Management Plan required under condition E20 and include consideration of the above criteria. Where the above criteria cannot be met for any proposed Ancillary Facility, the Proponent shall demonstrate to the satisfaction of the Secretary that there will be no significant adverse impact from that facility's construction or operation. Such assessment(s) can be submitted separately or as part of the Construction Environmental Management Plan.</p>			
	Construction Environmental Management Plan			
E20	Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement (following approval) a Construction Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be	<p>Non-conformance: The following non-conformances were identified against the implementation of the Construction Environmental Management Plan:</p> <p>1. Environmental Work Method Statements have not been created</p>	NC	<p>Recommendation: Review requirements of the CEMP and ensure processes are established for the effective implementation of these requirements.</p> <p>Future consideration to be given to</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>followed during construction, and shall be prepared in consultation with the relevant government agencies (including Council), and in accordance with the Guideline for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) a description of activities to be undertaken during construction of the Project (including staging and scheduling); b) statutory and other obligations that the Proponent is required to fulfil during construction, including approvals I consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies; c) a description of the roles and responsibilities for relevant employees involved in the construction of the Project, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors are aware of their environmental and compliance obligations under these Conditions of Approval; d) an environmental risk analysis to identify the key environmental performance issues associated with the construction phase; and e) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts (including any impacts arising from the staging of the construction of the Project). In particular, the 	<p>(CEMP Section 4.1.3).</p> <ol style="list-style-type: none"> 2. Progressive Erosion Sediment Control Plans not prepared (CEMP Section 4.1.4). 3. Weekly inspections not consistently completed (CEMP Section 8.1). 4. Internal audit report not completed as planned, i.e. within 3 months of commencement of construction (CEMP Section 8.3.3). 		<p>ensuring the CEMP is concise and adequately written to clearly describe what will be completed, when, by whom and what records will be maintained.</p>

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>following environmental performance issues shall be addressed in the Plan:</p> <ul style="list-style-type: none"> i. compounds and ancillary facilities management; ii. noise and vibration; iii. traffic and access; iv. soil and water quality and spoil management; v. air quality and dust management; vi. management of Aboriginal and non-Aboriginal heritage; vii. soil contamination, hazardous material and waste management; viii. management of ecological impacts; and ix. hazard and risk management <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of construction, or as otherwise agreed by the Secretary.</p> <p>The Plan may be prepared in stages, however, construction works for each stage shall not commence until written approval has been received from the Secretary.</p> <p>The approval of a Construction Environmental Management Plan does not relieve the Proponent of any requirement associated with this Approval. If there is an inconsistency with an approved Construction Environmental Management Plan and the conditions of this Approval, the requirements of this Approval prevail.</p>			
	Rehabilitation and Revegetation.			
F6	The Proponent shall implement a revegetation and	Opportunity for improvement: Infigen has not yet engaged or sought approval for an	OFI	Recommendation: The Proponent is to be consider and act on this requirement

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
Project Approval 10_0157 MOD 4				
	<p>rehabilitation programme for all areas of the Project footprint which are disturbed during the construction of the Project, which are not required for the ongoing operation of the Project, including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Secretary, the Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) as being well established, in good health and self sustaining.</p>	<p>independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) for monitoring rehabilitation revegetation and rehabilitation has commenced on site.</p>		<p>to ensure compliance with the requirements to engage an independent and suitably qualified expert for monitoring of rehabilitation.</p>

9. Summary of findings against the Environmental Protection Licence.

Environmental Protection Licence:

This audit identified three (3) non-compliances across three (3) conditions of the EPL. A further three (3) Opportunities for Improvement were identified across three (3) conditions of the project approval. Two (2) of these non-compliances and two of the opportunities for improvement relate to findings already raised within the Project Approval findings.

Table 2: Summary of Audit Non-compliances and Recommendations

Definition of Compliance Status

NC	Non-compliant – Recommendation identified.
OFI	Opportunity for improvement – Recommendation identified.

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
EPL				
O4.1	<p>The licensee must ensure all erosion and sediment control measures installed on the premises must be inspected and works undertaken to repair and/or maintain these controls: a) Weekly during normal construction hours outlined on Condition L5.1; and b) within 24 hours on a weekday, within 60 hours on a weekend, or once road is declared open, following the cessation of a rainfall event causing runoff to occur on or from the premises.</p> <p>The licence must record all such inspections including observations and works undertaken to repair and/or maintain erosion and sediment controls as nominated in Construction Soil and Water Quality Management Plan.</p>	<p>Refer to notes in Project Approval checklist – Condition E20.</p> <p>Non-Compliance: Inspections of erosion and sediment controls have not been undertaken (no records maintained).</p>	NC	<p>Recommendation: Undertake inspections of erosion and sediment control measures as required EPL Condition O4.1 and ensure required records are maintained.</p>
O4.2	<p>The licensee must ensure all erosion and sediment controls are designed, constructed, operated and maintained in accordance with the guideline "Managing Urban Stormwater - Soils and Construction: Volume 1" Landcom 2006.</p>	<p>Refer to notes and Non-Compliance in Project Approval checklist – Condition E13.</p>	NC	

Condition No.	Condition	Details of Non-Conformance	Compliance Status	Recommendations
EPL				
O5.1	The licensee must record the type and volume of all waste generated at the premises and ensure waste is only transported to a premises that can lawfully receive the waste.	Refer to notes and Improvement Opportunity in Project Approval checklist – Condition C31.	OFI	
O6.2	Bund Construction & Maintenance The Licensee must ensure that fuel and chemical storage areas have appropriate bunding. Bunds must be designed, constructed and maintained in accordance with the EPA Technical Guideline <i>Bunding and Spill Management</i> (found at http://www.epa.nsw.gov.au/mao/bundingspill.htm).	Refer to notes and Improvement Opportunity in Project Approval checklist – Condition C11.	OFI	
O6.3	A Construction Soil and Water Quality Management Plan (Plan) must be prepared for all aspects of the construction phase of the development and must be implemented. Implementation of the Plan must mitigate the impacts of stormwater runoff from and within the premises during construction. The Plan should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the scheme should be consistent with the guidance contained in Managing Urban Stormwater: Control Handbook (available from the EPA).	Refer to notes and Non-conformance in in Project Approval checklist Condition E13 and E21(d)	NC	
M2.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	Opportunity for improvement: Whilst the required weather data is likely available it was not able to be produced at the time of the audit.	OFI	Recommendation: Infigen to review and assess availability and access to the required weather data and ensure it is monitored and records maintained.

Disclaimer:

- This report does not and should not be seen as advice. Please consult a qualified advisor or consultant for advice.
- The findings of the compliance audit are based upon visual observations of the site and its vicinity, interviews with site personnel and interpretation of documentation provided to the auditor during prior to, during and within 1 week following the audit site inspection and interview process.
- Due to the sampling nature of this audit, the time available and sample size, some issues, non-compliances or improvements might not have been identified in the present report. This does not imply that these issues do not exist, or are in compliance. Employees, management and other stakeholders of the organization need to be and are responsible for, continuously identifying and taking necessary action to ensure continued compliance with the project requirements, and legislation.
- Opinions presented herein apply to the site as it existed at the time of the audit and are derived from information provided to the Auditor by Infigen and CATCON representatives and government agencies. Any changes to this information or any additional information, which has not been brought to the attention of the auditor at the time of the audit, is not considered in this report.
- Readers of this report should make judgment taking the above into account

10. Details of change following issue of draft report.

The following table outlines changes to this report following consultation with Infigen and CATCON after the provision of a draft report for comment:

Audit Report Section	Details of change / additional information	Outcome of change
7.3	Auditor recommendation - Bullet point 2 deleted. Section 6.1 of the CCAFMP outlines the location of, or methodology for locating, the nominated ancillary facilities.	One recommendation of auditor removed.
7.8	Auditor recommendation - Bullet point 2 updated to provide further clarification. New text added 'Table 6-1 could be updated to reference these procedures currently within the CBMP'.	No significant change.
8.	Overall number of non-compliant findings reduced from seven (7) to four (4) based on additionally information provided. Refer to further comments below for conditions B18, C6, and C7.	Reduction in non-compliant findings from seven (7) to four (4)
8. Appendix A, Condition B18	Additional information provided and compliance status updated to compliant. This condition was removed from this section. Details of additional information is recorded in Appendix A: Compliance Checklist and Audit Notes.	Compliance status of this condition updated to compliant.
8. Appendix A, Condition C6	Additional information provided and compliance status updated to compliant. This condition was removed from this section. Details of additional information is recorded in Appendix A: Compliance Checklist and Audit Notes.	Compliance status of this condition updated to compliant.
8. Appendix A, Condition C7 & E21(f).	Additional information provided and compliance status updated to compliant. This condition was removed from this section. Details of additional information is recorded in Appendix A: Compliance Checklist and Audit Notes.	Compliance status of this condition updated to compliant.
8. E13 & E21(d) Appendix A, Conditions E13 & E21(d)	Updated recommendation to refer to CATCON rather than Infigen. Also updated details of non-conformance to provide more clarity.	No change to compliance status.
Appendix A, B10.	Updated for additional information.	No change to compliance status (Compliant).
Appendix A, C10.	Updated for additional information.	No change to compliance status (Compliant).

Appendix A – Audit Checklist

Appendix A: Compliance Checklist & Audit Notes.

Definition of Compliance Status

C	Compliant
NC	Non-compliant – Recommendation identified.
OFl	Opportunity for improvement – Recommendation identified.
N/A	Not determined. Condition not applicable to phase of works. i.e. condition not yet triggered.

Project Approval 10_0157 MOD 4 - Compliance Checklist

Project Approval 10_0157 MOD 4.				
Condition No.	Condition	Notes of evidence sighted and/or audit comments	Compliance status	Recommendations
B1	<p>The Proponent shall carry out Project:</p> <p>(A) generally in accordance with the EA; and</p> <p>(B) in accordance with the conditions of this approval.</p> <p><i>Note: the general layout of the project is depicted in the figure in Appendix 1</i></p>	Refer to notes throughout this checklist.	N/A	
B2	In the event of any inconsistency between the documents referred to in Condition B1, the most recent document shall prevail to the extent of any inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	Noted.	N/A	
B3	<p>The Proponent shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> any strategies, plans, programs, reviews, audit correspondence that are submitted in accordance 	Evidence was available during the audit to demonstrate that the Proponent is complying with requests from the Secretary. Management plans have been revised in response to the Department's assessments.	C	

	<p>with the requirements of this approval;</p> <ul style="list-style-type: none"> any report, reviews or audits commissioned by the Department regarding compliance with this approval the implementation of any actions or measures contained in these documents. 			
B4	Subject to confidentiality, the Proponent shall make all documentation available for public inspection on request.	The auditor is unaware of any refused request. Considered to comply.	C	
	Limits of Approval			
B5	<p>This approval lapses 5 Years after the date of this Approval [30/08/13] unless the Proponent has confirmed to the satisfaction of the Secretary that orders have been placed for wind turbines, or demonstrated that work subject of this Approval has been completed on the Site before the date on which the Approval would otherwise lapse under this conditions. Work for the purpose of this condition includes at least one of the following:</p> <p>(A) internal track construction (B) civil works associated with the construction of the foundations for the wind turbine footings (C) control room substation construction (D) electrical substation construction (E) underground cabling or (F) internal overhead transmission line construction</p>	<p>Works subject to this approval have commenced on site, including:</p> <ul style="list-style-type: none"> internal track construction civil works associated with the construction of the foundations for the wind turbine footings control room substation construction electrical substation construction underground cabling; and transmission line construction. 	C	
B6	The project shall not exceed 33 wind turbines.	<p>Infigen website (https://www.infigenenergy.com/bodangora/) accessed 21/05/2018 during document review). 33 turbines. Confirmed during site inspection.</p> <p>Figure 1: Construction Certificate 2 Scope Site Plan (Aurecon document) that indicates 33 turbine locations.</p>	C	

B7	Prior to the commencement of construction, the Proponent shall provide written evidence to the satisfaction of the Secretary that the lease agreements with the site land owners have adequate provisions to require that decommissioning occurs in accordance with this Approval, and is the responsibility of the Proponent.	<p>This issue is considered by Infigen to have been managed prior to project funding and approval to proceed.</p> <p>Director General’s Environmental Assessment Report – Major Project Assessment: Bodangora Wind Farm, Page 52.</p> <p>Infigen letter to NSW DPE dated 08/12/2016 re: Condition B7 Limits of Approval, which links to the above Environmental Assessment Report.</p>	C	
B8	If any wind turbine is not used for the generation of electricity for a continuous period of 12 months, it shall be decommissioned by the Proponent, unless otherwise agreed by the Secretary. The Proponent shall keep independently-verified annual records of the use of wind turbines for electricity generation. Copies of these records shall be provided to the Secretary upon request. The relevant wind turbine and any associated infrastructure is to be dismantled and removed from the site by the Proponent within 18 months from the date that the wind turbine was last used to generate electricity.	N/A – no turbines commissioned at the time of this audit.	N/A	
	Statutory Requirements			
B9	The Proponent shall ensure that all licences, permits and approvals obtained and maintained as required throughout the life of the Project. No condition of this approval removes the obligation of the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the Project. All permits, licences and approvals must be maintained throughout the life of the project.	<p>The Infigen Contracts Manager and Infigen Health Safety and Environmental (HSE) Manager reported the Part 5A Approval and Environmental Protection Licence are the only licences, permits, and approvals required and obtained for the project.</p> <p>Evidence sighted:</p> <ul style="list-style-type: none"> • Project Approval (MP 10_0157) Modification 4, December 2017. • Environmental Protection Licence 20927 	C	

		(29-Jun-2017). Copy of approval and licence available and sighted during the audit.		
B10	For the purposes of section 75S(2)(b) of the EP&A Act, the relevant provisions, as defined in section 75S(1A) of the EP&A Act, apply to this approval <i>Note: this conditions is relevant to construction and occupation certificates for the Project</i>	Additional information provided upon request: Construction certificate CC-17146 from Blackett Maguire and Goldsmith Pty Ltd, dated 28/07/2017 Construction certificate CC-17239 from Blackett Maguire and Goldsmith Pty Ltd, dated 27/11/2017. Construction certificate CC-17275 from Blackett Maguire and Goldsmith Pty Ltd, dated 07/06/2018.	C	
	Staging			
B11	With the approval of the Secretary, the Proponent may submit any plan or program required by this approval on a progressive basis. To ensure the plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised plans or programs to the Secretary for approval. With the agreement of the Secretary, the Proponent may prepare any revised plan or program without undertaking consultation with all parties referred to under the relevant condition of this approval. <i>Notes:</i> <ul style="list-style-type: none"> while any plan or program may be submitted on a progressive basis, the Proponent must ensure that all development being carried out on the site is covered by suitable plans or programs at all times If the submission of any plan or program is to be staged, then the relevant plan or program must clearly describe the specific stage to which the plan or program applies, the relationship of this stage to any future critical stages, an the trigger for updating the plan or program 	No staging on this project (per. comms Contracts Manager and HSE Manager). The current approved CEMP was prepared for MOD 3. CEMP for MOD 4 submitted to Department of Planning (submitted 01/06/2018) and waiting approval. Changes are highlighted/struckthrough to allow understanding of changed. Approval of plans: <ul style="list-style-type: none"> Letter from DPE 28/06/2017 stating approval of the CEMP (MOD 3) dated 18 June 2017, as well as Compound and Ancillary Facilities Management Plan Noise and Vibration Management Plan Traffic and Access Management Plan Soil and Water Management Plan Heritage Management Plan (19/06) Biodiversity Management Plan (19/06) 	C	

		- Air Quality Management Plan (19/06)		
B12	Deleted following Modification 2	N/A	N/A	
	Compliance			
B13	Deleted following Modification 2	N/A	N/A	
B14	Deleted following Modification 2	N/A	N/A	
B15	In the event of a dispute between the Proponent and a public authority, in relation to an applicable requirement in this Approval or relevant matter relating to the Project, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on parties.	The auditor was not made aware of any such matter. N/A - Condition not triggered.	N/A	
	Planning Agreement			
B16	The Proponent shall implement the Planning Agreement entered into with Council dated 12 March 2012 (or as updated), unless otherwise agreed by Council. The contributions should be consistent with the general terms of agreement between Council and the Proponent including: (A) development contributions towards a community benefit fund, road maintenance, and project related Council Administration; and	The Infigen Contracts Manager and Infigen Health Safety and Environmental (HSE) Manager reported that a Community Fund has been established. Sighted project website https://www.infigenenergy.com/bodangora/community/bodangora-community-benefit-fund/	C	
B16	(B) agreed arrangements regarding the Traffic Study to be undertaken and the consequential road upgrade works, at the expense of the Proponent.	Dubbo Regional Council letter dated 20/07/2017 re: traffic Study (Version 3) and acceptance of Road Dilapidation Report. Dubbo Regional Council letter dated 18/08/2017 re: traffic Study (Version 3) and acceptance of Road Dilapidation Report prepared in consultation with Council officers.	C	

	Micro-siting restrictions			
B17	<p>The Proponent may micro-site the wind turbines and ancillary infrastructure without approval provided:</p> <ul style="list-style-type: none"> · (i) no wind turbine is moved more than 100 metres from the relevant GPS coordinates in Appendix 1; · (ii) the revised location of the wind turbine is at least 30 metres from existing hollow-bearing trees; or where the approved turbine location is already within 30 metres of existing hollow-bearing trees, the revised location of the turbine is not moved any closer to existing hollow-bearing trees; · (iii) no ancillary infrastructure (other than access tracks) is moved more than 100 metres from the location shown on the figure in Appendix 1; · (iv) any access tracks remain within the access track corridor shown on the figure in Appendix 1; and · (v) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this approval. <p><i>Note: Turbines 28 and 31, the section of access track between turbine 25 and 26 and the section of underground cabling between turbine 26 and 27 cannot be micro-sited further from the locations shown in Appendix 1.</i></p>	<p>Project Approval MOD 3 was established to approve the siting of two turbines beyond the micro siting boundaries. Turbine 28 and 31 were re-sited under Dodification 3.</p> <p>CEMP V1.0, appendix L – Turbine Micro siting impacts.</p> <p>Sighted email 06/06/2018 from Alexander Symonds Surveying Consultants that identifies the as built coordinates for all the towers.</p> <p>This condition appears to have been managed.</p> <p>Constrain maps are available within the revised CEMP (Submitted to but not yet approved by NSW DPE) and include the planned and actual locations of the turbines.</p>	C	
	Final Layout Plans			
B18	<p>Prior to the commencement of construction, the Proponent must submit detailed plans of the final layout of the Project to the Secretary, including:</p> <ul style="list-style-type: none"> (a) details on the micro-siting of any wind turbines and/or ancillary infrastructure; and 	<p>NON COMPLIANCE: Could not locate evidence that final layout plans were provided to the Secretary prior to commencement of construction.</p> <p>Sighted Aconex: Reference INFIGEN-RFI-000079, 23/05/2018. Request for information to satisfy</p>	C	<p>RECOMMENDATION: Provide Secretary with detailed plans of the final layout of the turbines and ancillary infrastructure, including details on micro-siting and GPS coordinates.</p>

	<p>(b) the GPS coordinates of the final wind turbine locations.</p> <p><i>Note: If the construction of the Project is to be staged, then the provision of these plans may be staged.</i></p>	<p>requirement of C13 and B18.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> Letter, 31/10/2017, from Infigen Contracts Manager to NSW DPE regarding final layout plan with respect to project substation and transmission line scope of works. 		
		<p>Additional information provided</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> Infigen letter to NSW DPE dated 19/07/2016 relating to Minor Modification relating to micrositing. Infigen letter to NSW DPE dated 26/05/2017 relating to Minor Modification relating to micrositing – Replacement turbine number and location table. Infigen letter to NSW DPE dated 19/06/2017 relating to Minor Modification relating to micrositing – Replacement turbine number and location table. Infigen letter to NSW DPE dated 27/06/2017, relating to submission of Final Layout Plans. 		
	Notification to Department			
B19	<p>Prior to the commencement of construction, operation and/or decommissioning of the project or cessation of operations, the proponent must notify the department in writing of the date of commencement or cessation.</p> <p>If the construction, operation and/or decommissioning of the</p>	<p>Infigen letter 19/06/2017 to NSW DPE re notification to Department regarding commencement of construction and no staging of project.</p> <p>Also sighted Wellington Times 27/06/17 'Utilising</p>	C	

	<p>project is to be staged, then the proponent must:</p> <p>(A) notify the department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage; and</p> <p>(B) inform the local community and the Community Consultative Committee (CCC) about the proposed staging plan.</p>	<p>local contractors' – job opportunities with Infigen Contractors. Newsletters and CCC meeting minutes are on the website.</p>		
	Schedule C: Environmental Performance			
	Biodiversity			
	Operating Conditions			
C1	<p>The Proponent must:</p> <p>(A) ensure that no more than 1.32 hectares (ha) of native vegetation is cleared for the Project, unless the Secretary agrees otherwise;</p> <p>(B) minimise:</p> <ul style="list-style-type: none"> • impacts on hollow-bearing trees; • impacts on threatened bird and bat populations; and • the clearing of native woodland vegetation and fauna habitat 	<p>Infigen letter to NSW DPE (15/10/2017) regarding adjustment to native vegetation clearing limits.</p> <p>NSW DPE letter to Infigen (03/10/2017) re: approval of the Biodiversity Offset Package (BOP) Version 1.5, August 2017.</p> <p>OPPORTUNITY FOR IMPROVEMENT: The Auditor notes that the BOP available on the project website is BOP Version 2, 22/02/2018. The version history of this plan is below and appears inconsistent with the above approval:</p> <ul style="list-style-type: none"> • Draft 1.0 12/10/2017 • Final 1.0 12/02/2018 • Final 2.0 23/02/2018. <p>Letter dated 06/11/2017 from Infigen to NSW DPE regarding adjustment to native vegetation clearance limits from 1.32ha to 3ha in consideration of TransGrid's detailed design and revised risk assessment of transmission line corridors. Letter included TransGrid's advice</p>	OFI	<p>RECOMMENDATION:</p> <ol style="list-style-type: none"> 1. Infigen to clarify the version history and ensure the BOP available on the project website and implemented on site is the approved version of the plan. 2. Consideration to be given to revising the Construction Biodiversity Management Plan to reference the pre-clearing checklist and outlining the requirements for its use.

		<p>document (letter dated 15/10/2015).</p> <p>EPC Contractor Scope of Works</p> <p>Evidence sighted for CATCON:</p> <ul style="list-style-type: none"> - Native vegetation clearing register. This register includes details for: Area, Group, Location, Section, Design, Set Out and Demarcation, Ecologist Check, Date cleared, area cleared. - Currently 0.99 ha recorded as cleared. - Photos are included of cleared areas. - Pre-clearing checklists are required by the CBMP. <p>Transgrid scope of works</p> <p>Evidence sighted includes:</p> <p style="padding-left: 40px;">Tree clearing register, approx. 1.32ha cleared.</p> <p style="padding-left: 40px;">Consultant reports for clearing.</p> <p>OPPORTUNITY FOR IMPROVEMENT: There are details on when and who will complete the pre-clearing checklist provided in Appendix A of the Construction Biodiversity Management Plan.</p>		
C2	<p>Tree trunks and major branches from cleared trees should be used, to the fullest extent practicable, to enhance habitat (coarse woody debris) in rehabilitated areas or in derived native grassland (either in offset areas or areas adjoining impacted areas) and details included in the Construction Biodiversity Management Plan required by Condition E21 (f)</p>	<p>Sighted some evidence of re-use during site inspection, however it is difficult to determine fullest extent practicable during ½ day site inspection. Considered to comply.</p> <p>The Construction Biodiversity Management Plan Section B.4 provides details on re-use of woody debris for habitat enhancement.</p>	C	
	Detailed Design and Micro-Siting			

C3	This clause deleted under Conditions of Consent Modification 4	N/A	N/A	
C4	This clause deleted under Conditions of Consent Modification 4	N/A	N/A	
C5	This clause deleted under Conditions of Consent Modification 4	N/A	N/A	
	Bird & Bat - Monitoring & Management.			
C6	<p>Prior to commencement of construction, the Proponent shall prepare and submit for the approval of the Secretary a Bird and Bat Management Program, which takes into account bird/ bat monitoring methods identified in the current editions of AUSWEA Best Practice Guidelines. The Program shall be prepared in consultation with OEH and implemented by a suitably qualified expert, approved by the Secretary. The Program shall incorporate Monitoring, and a Decision Matrix that clearly sets out how the Proponent will respond to the outcomes of monitoring. It shall:</p> <p>(A) incorporate an ongoing role for the suitably qualified expert;</p> <p>(B) set out monitoring requirements in order to assess the impact of the Project on bird and bat populations, including details on survey locations, parameters to be measured, frequency of surveys and analyses and reporting. The monitoring program shall be capable of detecting any changes to the population of birds and / or bats that can reasonably be attributed to the operation of the Project, that is, data may be required to be collected prior to the commencement of construction;</p> <p>(C) incorporate a decision making framework that sets</p>	<p>The Bird and Bat Adaptive Management Program was submitted to and approved by the Secretary (letter dated 07/06/2017). The same letter indicates OEH consultation. The Bird and Bat Adaptive Management Program was available on the Infigen Website (accessed 09/07/2018).</p> <p>Evidence of implementation sighted include</p> <ul style="list-style-type: none"> • Bodangora Wind Farm – Grey-Crowned Babbler Survey, Brett Lane & Associates Pty Ltd, January 2018. • Bodangora Wind Farm – Spring Survey of the Superb Parrot Survey, Brett Lane & Associates Pty Ltd, January 2018. • Infigen letter dated 19/01/2018, re: submission of pre-construction survey and Spring Survey. • Bodangora Wind Farm – Targeted Superb Parrot Survey Spring 2017 – Summer/Autumn 2019, Brett Lane & Associates Pty Ltd, May 2018. <p>No bird strikes have been recorded since commencement of construction.</p>	C	

	<p>out specific actions and when they may be required to be implemented to reduce any impacts on bird and bat populations that have been identified as a result of the monitoring;</p> <p>(D) identify 'at risk' bird and bat groups, seasons, and I or areas within the Project site which may attract high levels of mortality and include monthly mortality assessments and periodic local population census' and bird utilisation surveys;</p> <p>(E) identify potential mitigation measures and implementation strategies in order to reduce impacts on birds and bats such as minimising the availability of raptor perches, swift carcass removal, pest control including rabbits, use of deterrents, and sector management including switching off turbines that are predicted to or have had an unacceptable impact on bird I bat mortality at certain times; and</p> <p>(F) identify matters to be addressed in periodic reports in relation to the outcomes of monitoring, the application of the decision making framework, the mitigation measures identified, progress with the implementation of such measures, and their success.</p> <p>The reports referred to under part (f) shall be submitted to the Secretary and OEH on an annual basis for the first 5 years of operation and every 2 years thereafter (unless otherwise agreed by the Secretary), and shall be prepared within 2 months of the end of the reporting period. The Secretary may, at the request of the Proponent at anytime, vary the reporting requirement or period by notice in writing to the Proponent.</p> <p>The Proponent is required to implement feasible and reasonable mitigation measures as identified under part (e) where the need for further action is identified through the Bird and Bat Adaptive Management NONProgram, or as otherwise agreed with the Secretary.</p>	<p>Additional information provided</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Infigen letter to NSW DPE dated 10/02/2017, seeking approval of suitably qualified expert. <p>Note: The Bird and Bat Adaptive Management Program was subsequently approved by the Secretary (letter dated 07/06/2017). The authors of the approved plan are the same personnel nominated to implement the plan.</p> <p>Compliance status updated from Non-Compliant to Compliant.</p>		
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	Biodiversity Offset Package (BOP)			
C7	<p>Following final design, and prior to commencement of construction in areas requiring native vegetation clearing, or as otherwise agreed to by the Secretary, the Proponent shall develop and submit a Biodiversity Offset Package for the approval of the Secretary. The Package shall detail how the ecological values lost as a result of the Project will be offset. The Biodiversity Offset Package shall be developed in consultation with the OEH and shall (unless otherwise agreed by the Secretary) include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (A) the identification of the extent and types of habitat that would be lost or degraded as a result of the final design of the Project; (B) the objectives and biodiversity outcomes to be achieved (including 'improve or maintain' biodiversity values), and the adequacy of the proposed offset considered; (C) the final suite of the biodiversity offset measures selected and secured, including but not necessarily limited to: <ul style="list-style-type: none"> I. an offset proposal which is supported by a suitable metric method (such as the Bio banking 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 08/02/2018 setting out approval for Infigen's proposal to apply security mechanisms for the Bodangora Wind Farm project and extension of the deadline for finalising the mechanism to 31 December 2018. • NSW DPE letter to Infigen dated 03/10/2017 setting out approval of the revised BOP subject to the securing the offset in perpetuity. • NSW DPE letter dated 24/11/2017 approving increase in clearing to 3ha and approving the updated BOP. 		

	<p>Assessment Methodology);</p> <p>II. details of the relative condition and values of communities on the offset site in comparison to those to be impacted, including all areas of derived native grassland in moderate to good condition; and</p> <p>III. proposed management actions and expected gains;</p> <p>(d) the monitoring requirements for compensatory habitat works and other biodiversity offset measures proposed to ensure the outcomes of the package are achieved, including:</p> <ul style="list-style-type: none"> I. the monitoring of the condition of species and ecological communities at offset locations; II. the methodology for the monitoring program(s), including the number and location of offset monitoring sites, and the sampling frequency at these sites; and III. provisions for the annual reporting of the monitoring results for a set period of time as determined in consultation with the OEH; <p>(e) timing and responsibilities for the implementation of the provisions of the Package;</p> <p>(f) evidence that the offset(s) has been acquired and/ or is permanent and secure prior to the commencement of construction;</p> <p>(g) how securing the site addresses the residual impacts of the action on threatened species;</p> <p>(h) proposed long term funding for management actions as well as roles and responsibilities; and</p> <p>(i) key milestones, performance indicators, corrective actions and timeframes for the completion of all actions outlined in the Package.</p>	<p>Additional comment post issue of draft report:</p> <p>Planning processes for the obligations under this condition have commenced. Discussion was held with the Infigen Contractors Manager and the auditor agrees that the Secretary has extended the deadline for finalising the mechanism to 31 December 2018 (NSW DPE letter to Infigen dated 08/02/2018). As such, as this deadline has not lapsed, Infigen are currently complying with the requirements of the Secretary with regard to this condition.</p> <p>Compliance status updated from Non-Compliant to Compliant.</p>		
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	<p>Land offsets shall be consistent with the Principles for the use of Biodiversity Offsets in NSW (OEH, 2011) and the Environmental Protection and Biodiversity Conservation Act 1999 - Environmental Offset Policy. Any land offset shall be enduring and be secured by a conservation mechanism which protects and manages the land in perpetuity. Where land offsets cannot solely achieve compensation for the loss of habitat, additional measures shall be provided to collectively deliver an improved or maintained biodiversity outcome for the region.</p> <p>Where monitoring indicates that biodiversity outcomes are not being achieved, feasible and reasonable remedial actions shall be undertaken to ensure that the objectives of the Biodiversity Offset Package are achieved.</p>			
	Water Quality and Hydrology			
C8	<p>Except as may be provided by an EPL, the Project shall be constructed and operated to comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters.</p>	<p>No water pollution incidents were reported to or identified by the auditor.</p> <p>Considered compliant.</p>	C	
C9	<p>Waterway crossings shall be designed and constructed in consultation with DPI - Water and DPI (Fisheries) and consistent with DPI (Fisheries) guidelines, Policy and Guidelines for Fish Friendly Waterway Crossings (2004) and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004).</p>	<p>Email from NSW DPI dated 14/11/2017 regarding Spicers Creek crossing. Email outlines approved under Condition C9 and E15, which required DPI consultation.</p> <p>Spicers Creek is a third order watercourse.</p> <p>Controlled activity licence is not required as it is</p>	C	

		<p>within the proposed construction areas.</p> <p>Gillinghall Road culverts not modified.</p> <p>The auditor did not assess each crossing, however the Spicers Creek crossing appears generally consistent with the requirements of DPI - Water.</p>		
	Noise			
C10	Any overhead transmission line associated with the Project shall be designed, constructed and operated to minimise the generation of corona and aeolian noise as far as feasible and reasonable at nearest existing non-associated residences.	<p>Additional information provided upon request: Sighted Structural and Electrical Engineering Design Certificate from TransGrid (11/08/2017).</p>	C	
	Hazards and Risk			
C11	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with:</p> <p>(a) all relevant Australian Standards;</p> <p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997).</p> <p>In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	<p>A hazardous substance container is located within the main compound, as well as numerous self banded pallets.</p> <p>The batch plant has now been decommissioned and removed; however documentation (set up diagrams) provided indicate that the process was established.</p> <p>Opportunity for improvement: Self banded pallets were observed in numerous locations within the compound and were exposed to the elements.</p>	OFI	<p>Recommendation: Consideration to be given to conducting a risk assessment and considering the risks and opportunities for centralising the storage of substances and providing a sheltered location for this in accordance with the NSW EPA Bunding and Spill Management Guidelines.</p>
	Aviation Obstacles and Hazards			
C12	<p>Prior to the commencement of construction, the Proponent shall consult with:</p> <p>(A) aerodrome operators that have an aerodrome</p>	<p>A register of correspondence and consultation with regard to aviation hazards and obstacles has been established and maintained by Infigen (sighted).</p>	C	

	<p>located within 30 kilometres of the boundaries of the site, to determine any impact on Obstacle Limitation Surfaces at such aerodromes;</p> <p>(B) Air Services Australia, to determine potential impacts on instrument approach procedures at aerodromes, navigational aids, communications and surveillance facilities; and</p> <p>(C) Aerial Agriculture Association Australia, to determine potential hazards to aerial application and related operations.</p> <p>Feasible and reasonable mitigation measures for each of the potential impacts and hazards identified, shall be determined in consultation with the respective groups identified in this condition, prior to the commencement of construction</p>	<p>Consulted (or advised) parties include:</p> <ul style="list-style-type: none"> • Bodangora Airport • AirServices Australia • Aerial Agricultural Association Australia • Civil Aviation Safety Authority • Royal Australia Air Force (RAAF) • Wellington Aero Club Inc. 		
C13	<p>Prior to the commencement of construction, the Proponent shall provide the following information to the Civil Aviation Safety Authority, Air services Australia, Royal Australian Air Force - Aeronautical Information Services, the Aerial Agricultural Association of Australia, as well as all known users of privately owned local airfields:</p> <p>(A) "as constructed" coordinates in latitude and longitude of each wind turbine generator;</p> <p>(B) final height of each wind turbine generator in Australian Height Datum; and</p> <p>(C) ground level at the base of each wind turbine generator in Australian Height Datum.</p>	<p>Infigen has requested the final location data in order to establish the "as constructed" locations, final height and ground level base for each turbine.</p> <p>Sighted Aconex: Reference INFIGEN-RFI-000079, 23/05/2018. Request for information to satisfy requirement of C13 and B18.</p> <p>Sighted emails maintained to address the conditions of consent C12 and C13, including a Consultation Table maintained by the Contracts Manager.</p> <p>Example of email includes:</p> <ul style="list-style-type: none"> • Infigen email to RAAF – Aeronautical Information Services dated 23/06/2017 providing "as constructed" coordinates of each wind turbine, final height and ground level in Australian Height Datum. 	C	
C14	Should increases to the costs of aerial agricultural spraying on	Operational aspect of the project – not yet	N/A	

	any non-associated property surrounding the site be attributable to the operation of the Project, the Proponent shall fully fund to the affected landowner, the reasonable cost difference between pre-construction aerial agricultural spraying and the increased cost, as agreed between the relevant parties.	triggered.		
	Radio Communication			
C15	<p>C15. Prior to the commencement of construction, the Proponent shall:</p> <p>(A) consult with the NSW Government Telecommunications Authority and other registered communications licensees (including emergency services) to ensure that risks to these services are minimised as far as feasible and reasonable. This may include the installation of additional radio sites or services to ensure coverage of radio communications are not degraded;</p> <p>(B) in the event that any disruptions to radio communication service links (installed before construction of the Project) arise as a result of the Project, the Proponent shall undertake appropriate remedial measures in consultation with the NSW Government Telecommunications Authority and relevant licensee to rectify any issue, including arranging the deployment of temporary measures in order to maintain effective coverage whilst more permanent measures are effected, within three months of the problem being identified, and at the expense of the Proponent;</p> <p>(C) consider remedial measures, including:</p> <ol style="list-style-type: none"> i. modification to or relocation of the existing antennae; ii. installation and maintenance of additional radio sites or services; 	<p>There is a significant amount of correspondence within this condition.</p> <p>Sighted correspondence folder associated with C15, including Radio Communication Consultation Log that details consultee, the contact, date contacted and response received.</p> <p>Consulted (or advised) parties include:</p> <ul style="list-style-type: none"> • NSW Telecommunications Authority • Telstra • Optus • Murray River Regional Telecommunications Company Ltd. (Countrytell) • Vertical Telecoms (note: Tenant of Essential Energy) • QESTel • Allegro Networks (now Big Air) • Broadcast Australia (ABC) • SBS Networks • Air Services • Australian Capital Television Pty Ltd (SCA) • TransGrid • NSW Rural Fire Service (RFS) • NSW Police Service • Department of Environment and Heritage 	C	

	<p>iii. installation of a directional antennae; and I or iv. installation of an amplifier to boost the signal strength.</p>	<ul style="list-style-type: none"> • Dubbo Regional Council • Essential Energy • State Water Corporation • Soul Pattinson • Digital Distribution Australia <p>Sighted Bodangora Wind Farm – Investigation of Possible Impacts on Broadcasting and Radio Communication Services (final), L.Derrick & Associates (30/08/2018).</p> <p>Sighted Infigen email to NSW RFS dated 16/05/2017 regarding the above listed report and micro-sited wind turbine locations.</p>		
	Bushfire Risk			
C16	<p>The Proponent shall ensure that all Project components on site are designed, constructed and operated to minimise ignition risks, provide for asset protection consistent with relevant RFS design guidelines (Planning for Bushfire Protection 2006 and Standards for Asset Protection) and provide for necessary emergency management including appropriate fire-fighting equipment and water supplies on site to respond to a bush fire.</p>	<p>Evidence of application reviewed under the Transgrid scope of works. TransGrid currently in process of obtaining construction certificates through Blackett, McGuire and Goldsmith (certifier).</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - Building Code of Australia Assessment Report – Substation Auxiliary Services Building Bodangora Wind Farm, NewCert, Oct 2016. - Bushfire management plan report, ecological Australia. - CATCON Bushfire Emergency Management Plan (Rev B), 22/12/2017. - Water carts on site with cannons. - 3 trained RFS members within the CATCON team (no formal record of training maintained). - Equipment is maintained throughout the 	C	

		<p>construction (dual use equipment).</p> <ul style="list-style-type: none"> - Areas around assets appeared maintained so as to minimise ignition risks. 		
C17	<p>Throughout the operational life of the Project, the Proponent shall regularly consult with the local RFS about details of the Project, including the construction timetable and the final location of all infrastructure on the site. The Proponent shall comply with any reasonable request of the local RFS to reduce the risk of bushfire and to enable fast access in emergencies.</p>	<p>Operational phase of the project. Example of consultation includes:</p> <ul style="list-style-type: none"> • Infigen email to NSW RFS dated 16/05/2017 regarding the above listed report and micro-sited wind turbine locations. 	C	
	Views/ Visual Amenity			
C18	<p>All non-associated receptor's whose dwelling may be subject to moderate to high visual impact, as defined in the EA, shall be consulted regarding impact minimisation measures. The outcomes of this consultation process shall be used to inform the Design and Landscape Plan, required under condition C26.</p>	<p>The following evidence was sighted:</p> <ul style="list-style-type: none"> • Design and landscape plan submitted to the DPE (Infigen email dated 01/11/2017). • NSW DPE response (email dated 08/03/2018) outlining a number of comments for consideration. • Dubbo Regional Council letter to Infigen dated 12/04/2018 outlining satisfaction with the proposed design and landscaping obligations. • Infigen email to NSW DPE dated 18/05/2018 responding to comments for consideration and providing a revised Design and Landscape Plan for approval. • Design and Landscaping Plan, Moir Landscape Architecture, Rev G, 17/05/2018. <p>The auditor was not made aware of, and did not identify any instance of correspondence or request for impact minimisation measures.</p> <p>Section 2.1 of the Design and Landscaping Plan</p>	C	

		states "In the preparation of the Landscape and Visual Impact Assessment (LVIA) for the Bodangora Wind Farm, three (3) properties were assessed as having a moderate to high visual impact. Two (2) of these properties were identified as associated, leaving one (1) non-associated property with which to consult. The non-associated property referred to as House 11 in the report was within 2km of proposed Turbine 40. Turbine 40 was removed in the final site layout hence there are no medium to high impact non-associated residences".		
C19	At the request of any owners of non-associated residential dwellings with views of a turbine(s) located within five kilometres of their dwellings, the Proponent shall provide and bear the full cost of reasonable landscaping treatments to visually screen these dwellings. Such a request may be made in writing by the owner of the dwelling within six months from the commencement of operation of the Project, and landscaping treatments agreed between the parties shall be implemented and completed within 12 months of such an agreement. Should the parties not be able to reach agreement on the scope of landscaping treatments, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral shall be final and binding on the parties.	No requests have been received to date by the project team. Design and Landscaping Plan states that a letter will be issued to non-associated residences within 5km of a wind turbine within one month from commencement of operation. This has not yet been triggered.	C	
C20	Landscaping works to reduce the visual impact of the Project shall generally comprise of indigenous and locally occurring species.	Rehabilitation and stabilisation works were observed on site during the audit site inspection. The Contracts Manager reported that no landscaping has occurred on site. Evidence sighted includes: - CATCON Landholders Consultation Meeting 15/05/2018 that included discussion on seed type and re-seeding	C	

		<p>maps. Grass mix was approved by the farmers based on consultation.</p> <ul style="list-style-type: none"> - CATCON revegetation Progress Summary, which includes details of paddock, landowner and Seedmix used. 		
	Turbine and Associated Infrastructure External Design			
C21	The Proponent shall maximise the use of building materials and treatments for associated infrastructure which visually complement the surrounding environment	Addressed in the landscape and design management plan. Considered to comply.	C	
C22	The turbines shall be painted matte off-white /grey. The blades shall be finished with a surface treatment that minimises any potential for glare or reflection. No advertising, signs or logos shall be mounted on the turbines, except where required for safety purposes. (Note, under Modification 4 the requirement of a matte finish was deleted)	Upon visual inspection the turbines appear painted in off-white/grey. Considered to comply. The auditor did not see advertising, signs or logos mounted on turbines.	C	
	Shadow Flicker			
C23	Shadow Flicker from the project must not exceed 30 hours/annum at any residence not associated with the project	N/A to construction. The shadow flicker is considered as part of the design and is triggered during operation. Refer to EA.	N/A	
	Substation			
C24	The substation and associated facility site shall be designed and constructed to minimise visual intrusion to the nearest sensitive receivers as far as feasible and reasonable including appropriate external finishes to minimise glare or reflection, landscape planting to screen views and external lighting requirements in accordance with condition C25.	<p>Landscape and Design Plan.</p> <p>Located in an isolated location away from any sensitive receiver.</p> <p>Considered to comply.</p>	C	

	Night Lighting			
C25	<p>With the exception of aviation hazard lighting implemented in accordance with the requirements of this condition, no external lighting other than low intensity security night lighting is permitted on site unless otherwise agreed or directed by the Secretary, or required by Civil Aviation Safety Authority (CASA).</p> <p>Prior to the commencement of construction, the Proponent shall consult with the Civil Aviation Safety Authority on the need for aviation hazard lighting in relation to the wind turbines. Any aviation hazard lighting shall be implemented in a manner that minimises visual intrusion to surrounding non-associated residences as far as feasible and reasonable.</p>	<p>Maintenance and safety lighting only.</p> <p>Lighting has been installed in accordance with the Landscaping and Design Guideline.</p> <p>Bodangora Wind Farm Aviation Impact Statement, GHD, October 2012.</p> <p>Consultation with CASA addresses lighting requirements includes:</p> <ul style="list-style-type: none"> • Infigen letter to CASA dated 06/04/2017 regarding requirements for aviation hazard lighting. • CASA letter to Infigen dated 03/07/2017 stating that ... “ the National Airport Safety Advisory Guidelines are not triggered” [by the development] ... “Any decision to light the turbines, or otherwise, remains with the planning authority and the proponent”. 	C	
	Design and Landscape Plan			
C26	<p>A Design and Landscaping Plan shall be prepared to outline measures to ensure appropriate development and maintenance of landscaping on the site to achieve adequate landscape buffers and address the visual impacts arising from the Project, including turbines, site access roads and associated above ground infrastructure, as far as is feasible and reasonable.</p> <p>The Plan shall be prepared by a qualified landscape architect and where relevant meet any requirements of Council. The Plan shall include design treatments for the turbines and ancillary infrastructure, including, but not necessarily limited to:</p>	<p>Design and landscape submitted to and approved by NSW DPE. The following evidence was sighted:</p> <ul style="list-style-type: none"> • Design and landscape plan submitted to the DPE (Infigen email dated 01/11/2017). • NSW DPE response (email dated 08/03/2018) outlining a number of comments for consideration. • Dubbo Regional Council letter to Infigen dated 12/04/2018 outlining satisfaction with the proposed design and landscaping obligations. • Infigen email to NSW DPE dated 	C	

	<p>a) the landscape screening measures at non-associated residences in close proximity to the Project site and along nearby roadsides to screen potential moderate to significant views of the Project, including an outline of additional measures available for requested landscaping treatments;</p> <p>b) landscape elements and built elements, including proposed treatments, finishes and materials of exposed surfaces (including colour specifications);</p> <p>c) lighting;</p> <p>d) a schedule of species to be used in landscaping;</p> <p>e) details of the timing and progressive implementation of landscape works; and</p> <p>f) procedures and methods to monitor and maintain landscaped areas.</p> <p>The Plan shall be submitted for the approval of the Secretary prior to the commencement of permanent built works and/ or landscaping, unless otherwise agreed by the Secretary. The Plan may be submitted in stages to suit the staged construction program of the Project.</p>	<p>18/05/2018 responding to comments for consideration and providing a revised Design and Landscape Plan for approval.</p> <ul style="list-style-type: none"> • Design and Landscaping Plan, Moir Landscape Architecture, Rev G, 17/05/2018. <p>Infigen awaiting NSW DPE approval of the revised Design and Landscape Plan, however it has been submitted as required by the requirements of this condition.</p>		
	<p>Utilities and Services</p>			
<p>C27</p>	<p>Utilities, services and other infrastructure potentially affected by construction and operation shall be identified prior to construction to determine requirements for access to, diversion, protection, and/ or support. Consultation with the relevant owner and / or provider of services that are likely to be affected by the Project shall be undertaken to make suitable arrangements for access to, diversion, protection, and/ or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Proponent.</p>	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Request for Quote by Telstra technicians (Project Reference: SR210694-1) 15/12/17 for two locations on Gillinghall Road. • RMS Accepted drawings for the Goolma Road – Gillinghall Road Intersection Upgrade – Accepted for construction 08/02/2018 by R.C. RMD Western Project Engineer. • NSW RMS approval to commence construction within the State Road Reserve (SF2017/249220/1) dated 	<p>C</p>	

		<ul style="list-style-type: none"> 12/02/2018. CATCON DB4D and service authority folder for various sections. Cable crossings – CATCON managed processes for Dial before you Dig. Sighted CATCON DB4D and service authority folder for various sections. CATCON Non-conformity Report 14/03/2018 regarding the finished road. Client (RMS) sign off of corrective action with requirement for 24 month warranty period) dated 23/03/2018. 		
	Waste Management			
C28	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	<p>Infigen Contracts Manager and Infigen HSE Manager reported that no waste has been or is planned to be received on site.</p> <p>None identified during site inspection.</p> <p>Considered to comply.</p>	C	
C29	The Proponent shall maximise the reuse and/ or recycling of waste materials generated on site by the Project, to minimise the need for treatment or disposal of those materials outside the site.	Excavated material is being reused on site where possible. Considered to comply.	C	
C30	The Proponent shall ensure that no green waste associated with the Project is burnt on site during the life of the Project.	Infigen Contracts Manager and Site Supervisors reported no burning of material allowed on site.	C	
C31	The Proponent shall ensure that all liquid and/ or non-liquid waste generated on the site is assessed and classified in accordance with Waste Classification Guidelines (DECC, 2008), or any future guideline that may supersede that document, and where removed from the site is only directed	<p>OPPORTUNITY FOR IMPROVEMENT: Waste register is limited as it does not include volume of waste or easily identified classification.</p> <p>Sighted waste register, that tracks dates, removal company and link to docket.</p>	OFI	RECOMMENDATION: The register tracking waste removal off site could be improved by capturing the type, volume and disposal location. Record (receipt) of disposal at licenced facilities could be also be

	to a waste management facility lawfully permitted to accept the materials.	Sighted various docket for the removal of waste offsite. Evidence sighted includes: - Boland Contracting for removal of waste oil and contaminated soil.		maintained.
	Crown Land			
C32	Prior to the commencement of construction of the Project, the Proponent shall consult with and comply with the requirements of CL&W of Lands - Crown Land Division in relation to any Crown land affected by the Project to enable the lawful use of that land by the Project.	Evidence sighted includes: • Infigen letter to NSW DPE dated 29/03/2017 regarding Condition C32 Crown Land. • NSW DPI letter to Infigen dated 19/01/2017 regarding s.138 Roads Act 1993 Roads Authority Consent for structures over a Crown Public Road. Crown Lands issued a Roads Authority consent for structures over a Crown Public Road on the 19th January 2017 (Reference RM8: DOC17/008255). A Licence (Number LI 575731) under the Roads Act 1993, Section 147 which licences the crossing of Crown roads with wind farm access tracks and cabling was executed on the 28th March 2017.	C	
C33	Prior to the commencement of construction of the Project, the Proponent shall, with the agreement of Council, assume full maintenance responsibility for any Crown road reserves associated with the Project which are identified as requiring dedication to Council during the life of the Project. The Proponent shall retain full maintenance responsibility for any such road(s) for the duration of their dedication to Council during the life of the Project.			
	Trigonometric Reserves			
C34	Disturbance to Trigonometric Reserves shall be avoided during the life of the Project, unless otherwise approved by the Surveyor General and the relevant licence under the Crown Lands Act 1989 is obtained by the Proponent.	Nil. Not applicable.	N/A	
	Mineral Resources			
C35	Prior to the commencement of relevant construction works, the Proponent shall consult with the Division of Resources and Geosciences and holders of mineral, mining and	Condition C35 Mineral resources consultation log. Consultation has occurred with NSW Department of Trade investment, Alkane, Clancy Explor,	C	

	exploration titles or tenements, with respect to measures to be applied during construction and operation of the Project so as to minimise the potential for any sterilisation of resources on the tenement	Windora and Gullewa. Example of correspondence sighted: <ul style="list-style-type: none"> • Infigen email to Gullewa dated 17/06/2017. 		
	Schedule D: Community Information, Reporting and Auditing			
	Community information, consultation and involvement			
	Community Consultative Committee			
D1	From the commencement of construction, the Proponent must operate a CCC for the Project to the satisfaction of the Secretary, in accordance with the Community Consultative Guidelines for State Significant Projects (2016) or its latest version	CCC meeting minutes are available on Infigen project website. https://www.infigenenergy.com/bodangora/community/meeting-minutes/ Minutes updated once next meeting held. Evidence of Satisfaction of the Secretary outlined in Minutes July 2012.	C	
	Complaints and Enquiries Procedure			
D2	Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall ensure that the following are available for community enquiries and complaints for the life of the Project (including construction and operation) or as otherwise agreed by the Secretary: <ul style="list-style-type: none"> a) a 24 hour telephone number(s) on which complaints and enquiries about the Project may be registered; b) a postal address to which written complaints and enquires may be sent; c) an email address to which electronic complaints and enquiries may be transmitted; and d) a complaints management and mediation system for 	JIRA system (logs complaints). Evidence of communication of the complaints line includes: <ul style="list-style-type: none"> • Complaints may be logged through website https://www.infigenenergy.com/bodangora/questions-and-feedback/ • Infigen letter to NSW DPE dated 15/06/2017 regarding publication of complaints and enquiries procedure in Dubbo Daily Liberal newspaper 	C	

	<p>complaints unable to be resolved.</p> <p>The telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the commencement of construction and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this Approval.</p>	(03/05/2017).		
D3	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement a Complaints Management System consistent with AS 4269: Complaints Handling and maintain the System for the life of the Project.</p> <p>Information on all complaints received, including the means by which they were addressed and whether resolution was reached, with or without mediation, shall be maintained in a complaints register and included in the construction compliance reports required by this Approval. The information contained within the System shall be made available to the Secretary on request.</p>	<p>JIRA system used to track incidents, complaints etc. Captures details on Date time, person details.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - Complaint 11/04/2018 via email, re: visual impact of turbines. Contracts manager. Added to JIRA 18/04/2018. Site visit 18/04/2018. Items still to be addressed to close out. - Complaint 02/03/2018 re: complaints line phone call about bright lights facing the property. Site Manager to follow up. JIRA indicates item is closed however there is no record of action taken. - 05/09/2017 dust complaint re: Bodangora quarry. Sub-tasks considered completed in JIRA 06/09. 	C	
	Provision of Electronic Information.			
D4	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the Project, for the life of the Project. The Proponent shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:</p>	<p>https://www.infigenenergy.com/bodangora/</p> <p>Accessed during audit (including 10/07/2018) and found to contain links to relevant documentation.</p>	C	

	<p>a) information on the current implementation status of the Project;</p> <p>b) a copy of the documents referred to under condition B1 of this Approval, and any documentation supporting modifications to this Approval that may be granted;</p> <p>c) a copy of this Approval and any future modification to this Approval;</p> <p>d) a copy of each relevant environmental approval/ consent, licence or permit required and obtained in relation to the Project;</p> <p>e) a copy of each current strategy, plan, program or other document required under this Approval;</p> <p>f) the outcomes of compliance tracking in accordance with condition D5 of this Approval; and</p> <p>g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.</p>			
	Compliance Tracking Program			
D5	<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this Approval. The Program shall be submitted to the Secretary for approval prior to the commencement of construction and operate for the life of the Project. The Program shall include, but not necessarily be limited to:</p> <p>a) provisions for the notification of the Secretary prior to the commencement of construction and prior to the commencement of operation of the Project (including prior to each stage, where works are being staged);</p> <p>b) provisions for periodic review of the compliance status of the Project against the requirements of this Approval;</p>	<p>Compliance tracking program available on the website.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Compliance tracker (Nov, 2017) • Compliance tracker (Apr, 2018). <p>Sighted submission to the Secretary (Infigen email dated 17/11/2017).</p> <p>Sighted NSW DPE letter approving the Compliance Tracking Program 30/06/2017.</p>	C	

	<p>c) provisions for periodic reporting of compliance status to the Secretary, including a Pre-Construction Compliance Report, during construction reporting, and a Pre-Operation Compliance Report;</p> <p>d) a program for independent environmental auditing in accordance with /SO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing;</p> <p>e) mechanisms for recording environmental incidents during construction, and actions taken in response to those incidents;</p> <p>f) provisions for reporting environmental incidents to the Secretary and relevant public authorities (including Council) during construction and for the life of the Project;</p> <p>g) procedures for rectifying any non-compliance identified during environmental auditing, and review of compliance or incident management; and</p> <p>h) provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.</p>			
	Incident Notification			
D6	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Proponent becomes aware of the incident. The notification must identify the project (including the project application number and the name of the project if it has one), and set out the location and nature of the incident.	<p>Infigen have notified the Department of two incidents to date:</p> <ul style="list-style-type: none"> • Infigen email to NSW DPE 12/12/2017 regarding cultural heritage incident under Project Approval Condition E2. - Infigen email to NSW DPE 04/05/2018 regarding minor fuel spillage on public road from a fuel tanker. 	C	
	Non-Compliance Notification			

D7	The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Proponent becomes aware of any non-compliance. The notification identify the project and the application number for it set out the condition of approval that the project is non compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done or will be, undertaken to address the non compliance.	<p>Infigen have notified the Department of two incidents to date:</p> <ul style="list-style-type: none"> • Infigen email to NSW DPE 12/12/2017 regarding cultural heritage incident under Project Approval Condition E2. • Infigen email to NSW DPE 04/05/2018 regarding minor fuel spillage on public road from a fuel tanker. <p>Unable to confirm 7 days timeframe other than by verbal assurance from Infigen Contracts Manager.</p>	C	
	Independent Environmental Audit			
D8	<p>Within 1 year of the commencement of construction, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. These audits must:</p> <ol style="list-style-type: none"> be led and conducted by a suitably qualified, experienced and independent tea, of experts whose appointment has been endorsed by the Secretary; be carried out in consultation with the relevant agencies; assess whether the project complies with the relevant requirements in this approval and any strategy, plan, or program required under this approval; and recommend appropriate measures or actions to improve the environmental performance of the project, and any strategy or program required under this approval 	<p>19 June 2017 Infigen informed DPE confirming commencement of construction 03 July 2017.</p> <p>Peter Marshman of J2M Systems engaged by Infigen Energy. Infigen letter to DPE dated 03/04/2018 seeking endorsement of auditor.</p> <p>NSW DPE letter dated 18/04/2018 endorsing appointment.</p>	C	
D9	Within 3 months of commencing an audit, or unless agreed by the Secretary, a copy of the audit report must be	Not yet triggered.	N/A	

	submitted to the Secretary , and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report and a timetable for the implementation of the recommendations.			
D10	The recommendations must be implemented to the satisfaction of the Secretary.	Not yet triggered.	N/A	
D11	Within 3 years of the commencement of the operation of the project, or within 3 months of the submission of an: <ul style="list-style-type: none"> a) incident report under condition D6; b) audit under condition D8; or c) any modification to the conditions of this approval, the Proponent shall review, and if necessary revise, the strategies, plans and programs required under this approval to the satisfaction of the Secretary.	Not yet triggered.	N/A	
	Schedule E: Construction Environmental Management			
	Dust Generation			
E1	The Project shall be constructed in a manner that minimises dust emissions from the site, including wind-blown and traffic-generated dust and tracking of material onto public roads. All Project related activities on the site shall be undertaken with the objective of preventing visible emissions of dust from the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all feasible and reasonable dust mitigation measures, including cessation of relevant works as appropriate such that emissions of visible dust cease.	Water cart observed operational on site at time of audit site inspection. Seven tankers on site. Water trailers on site. Designated haul roads are constructed and watered down. Site Supervisor responsibility for managing dust within construction areas.	C	
	Heritage			
E2	In undertaking the Project, impacts to heritage, shall to the	NON-COMPLIANCE: Infigen compliance tracker,	NC	RECOMMENDATION: Continue progressing corrective actions in

	<p>greatest extent practicable, be avoided and minimised. In particular:</p> <p>a) clearly identify and avoid the stone procurement artefact area (SU18/L 1), and the Kaiser Mine, and include methods for restricting access to these sites as part of the Construction Heritage Management Plan required by condition E21(e); and</p> <p>b) where impacts as assessed in the EA are unavoidable, works shall be undertaken in accordance with the strategy outlined in the Construction Heritage Management Plan required by condition E21 (e).</p>	<p>April 2018, states the following:</p> <p><i>“ Condition D6 & D7: 4/4/18: The DPE was notified on 12/12/18 about an incident at location SU18/L1 within the site and followed the process identified in the CEMP and as required by this Condition. The incident has been investigated and was closed out by DPE on 7/3/18. A corrective action plan has been submitted to DPE” ...</i></p> <p><i>Condition E2 “4/4/2018: the incident at cultural heritage location SU18/L1 identified under Conditions D6 and D7 above has been investigated by the DPE and the EPC Contractor received a non compliance notice. The contractor is in the process of implementing remedial actions and the site is now fully fenced off with signage”.</i></p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - Catcon letter 06/04/2018 to DPE responding to the DPE Letter and penalty notice (07/03/2018), that outlines a plan of work to address the non-conformance (in accordance with DPE requirements). • CATCON incident report 891-026, dated 08/12/17. No bunting installed. <p>DPE Letter to Infigen with Re: Penelty Notice requesting a work plan submitted by 28 March 2018.</p> <p>28/06/2018 letter from Catcon to DPE re: heritage works plan update – summary of works to date, including summary of consultation with Aboriginal stakeholders.</p>		<p>response to the NSW DPE Penalty Notice.</p>
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E3	<p>Clearly identify the level of construction vehicles required to use the Sandy Hollow to Maryvale Railway line, and the ability of the existing road to accommodate heavy vehicles. Should widening or other enhancements be required to safely accommodate heavy vehicles, a Statement of Heritage Impact is required in accordance with relevant Heritage Council guidelines, in consultation with the Heritage Branch of the OEH, and to the satisfaction of the Secretary.</p>	<p>Infigen Contracts Manager reported no works will 'use' the Railway Line.</p> <p>Infigen compliance tracker, April 2018, states " 1/11/17: Heavy vehicles do not use the railway corridor. Light vehicle use has been kept to a minimum.</p> <p>21/2/2018: No project vehicles use the corridor. BWFPL has applied for permission for TransGrid contractor vehicles to use the corridor".</p>	C	
	Noise - Construction or Decommissioning Hours			
E4	<p>The Proponent shall only undertake construction or decommissioning activities between:</p> <ul style="list-style-type: none"> a) 7:00am to 6:00pm Mondays to Fridays; b) 8:00am to 1 :00 pm Saturdays; and c) at no time on Sundays or NSW public holidays. <p>The following construction activities may be undertaken outside these hours:</p> <ul style="list-style-type: none"> • activities that are inaudible at any non-associated residence; • activities approved under an out-of-hours (OOHW) work protocol (see condition E21 (b)(vi)); • the delivery of materials as requested by the gNSW Police Force or other authorities for safety reasons; 	<p>Out of hours works are being conducted by CATCON for the construction period and records of Applications for Out of Hours Works are maintained. Sighted 19 records of Out of Hours works.</p> <p>No non-conformance, complaints or breaches identified with regard to working hours.</p> <p>Working hours are communicated at induction. Discussion of working hours included at 3pm meeting.</p> <p>Application includes risk assessment approach to noise management.</p> <p>Evidence sighted:</p> <ul style="list-style-type: none"> - Current Application for Our of Hours Work 	C	<p>Recommendation: Monitoring programs within the CEMP, including the Application for Our of Hours Work (BDWF-OOHW-019) approved by the ER 21/05/2018 could be revised to clearly outline details for what, how, when, where, by who and what records would be maintained.</p>

	<p>or</p> <ul style="list-style-type: none"> emergency work to avoid the loss of lives, property and/or prevent environmental harm. 	<p>(BDWF-OOHW-019) approved by the ER 21/05/2018. for works 24/05/2018 – 30/09/2018.</p> <p>Opportunity for Improvement: Application for Our of Hours Work (BDWF-OOHW-019) approved by the ER 21/05/2018 states monitoring will be undertaken at ‘intervals’ during the approval period. There is no indication of how, when, where, by who and what records would be maintained of this monitoring.</p> <p>No noise related complaints have been received by CATCON.</p>		
E5	Deleted following Modification 1	N/A	N/A	
E6	Deleted following Modification 1	N/A	N/A	
	Construction Noise and Vibrations			
E7	<p>The Proponent shall only carry out blasting on site between 9am and 5pm Monday to Friday and 9am to 1 pm Saturday. No blasting is allowed on Sundays or NSW public holidays.</p>	<p>Blast records are maintained by CATCON.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> Blast locations included WTG 7, 8,9, 16, 18, 19, 21, 23, 31, & 32. Blast Pack by Sequel Drill and Blast contractor. <p>Pre-blast checklist develop post initial blasts.</p> <p>Auditor did not identify and was not made aware of a non-compliance against this condition.</p>	C	
E8	<p>The Proponent shall ensure that any blasting carried out during construction of the project does not exceed the criteria in Table 1.</p>	<p>OPPORTUNITY FOR IMPROVEMENT: Calibration record for the vibration monitor was not available at the time of the audit.</p>	OFI	<p>RECOMMENDATION: Consideration for Infigen to request calibration for the monitor used in blast monitoring</p>

	<p>Residence on privately owned land:</p> <ul style="list-style-type: none"> • 0% Allowable exceedance for 120dB(LinPeak) airblast overpressure and 10mm/s Ground vibration • 5% of total number of blasts over a 12 month period for 115dB(LinPeak) airblast overpressure and 5mm/s Ground vibration 	<p>Catcon maintains a register of blasts data.</p> <p>Verified recent records for this blast including: <u>Blast WTG-8-03</u> (third blast at site 8).</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> - CATCON Pre-blast check sheet completed 06/06/2018. Records include site photos pre-blast. - Blast report - Blast exclusions and environmental details, including location of monitoring. - Blast traffic plan (Area 16(01) 05/06/2018. - Sequal drill and blast hazard identify and risk control, blast design record and explosives transport cartnote. - Monitoring results at residence (06/06/2018, Peak overpressure 113.8 dBL, which complies with the requirements. <p><u>WTG 9-02</u></p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Catcon Pre-blast checksheet, 29/11/17 • Sequal drill and blast repor, including hazard identify and risk control, blast design record and explosives transport cartnote. • Blast monitoring report 29/11/2017 with 119.0 dBL peak overpressure and peak vector sum velocity 0.37 mm/s. 		<p>(TM Serial Number 4037).</p>
E9	Deleted following Modification 1	N/A	N/A	
E10	Deleted following Modification 1	N/A	N/A	

	Property Impacts			
E11	Access to private property shall be maintained during construction unless otherwise agreed with the affected property owner in advance. Access that is physically affected by the Project shall be reinstated by the Proponent to at least an equivalent standard, in consultation with the affected property owner.	Access to property is being maintained. A system of red/green pole has been established on some farm gates to indicate the way the gate should remain (i.e. red = closed, green = open). Access appears to be maintained.	C	
E12	Any damage caused to property as a result of the Project shall be rectified or the property owner compensated, within a reasonable timeframe, with the costs borne by the Proponent.	<p>Landowner consultation occurs weekly with Infigen, and occurred during this audit (with one landowner present).</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> Landholders consultation coordination meeting minutes (05/04/2018). <p>Catcon report property damage in incident reports.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> Hazard and Incident Report 010 (07/09/2017) relating to an underground service strike of a low pressure poly line stuck by grader forming drains. Farmer notified and pipe repaired. <p>Complaints process also in place to establish and respond to farmers' issues.</p> <p>Current issue is rehabilitation of exposed areas. This is a progressive issue and is known to Infigen and Catcon and appears to be being managed.</p> <ul style="list-style-type: none"> Sighted incident register. Sighted complaints register. 	C	
	Soil Water Quality and Hydrology			

E13	<p>The Proponent must:</p> <ul style="list-style-type: none"> a) ensure the wind turbine pads, ancillary infrastructure, access roads and any other land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions, to minimise erosion and control sediment generation; b) ensure all waterway crossings are constructed in accordance with the: <ul style="list-style-type: none"> • Water Guidelines for Controlled Activities on Waterfront Land (2012), or its latest version; and • Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version; c) store and handle all dangerous or hazardous materials on site in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; d) ensure the concrete batching plants and substation are suitably bunded; and e) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur. 	<p>NON-CONFORMANCE: Whilst evidence of sediment and erosions controls was observed on site during the audit site inspection, the auditor observed numerous instances where existing controls, or lack there of, were inconsistent with the requirements of Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008). Non-compliance observed include:</p> <ul style="list-style-type: none"> • Areas of site with exposed soils and no sediment and erosion controls. • Areas of site with exposed soils and only minimal sediment and erosion controls. • Areas of site with in adequately installed sediment and erosion control. • Lack of progressive sediment erosion control plans (as specified by CEMP). <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Design access track layout plans, which identify final design requirements including culverts, floodways, drains. • Old Erosion Sediment (ERSED) Plan for Gully leading to turbines 25 and 26. • A generic ERSEP Plan is established within the Erosion and Sediment Control Plan. • ERSCP No. 3 for the intersection Upgrade (Goolma and Gillingham Rd). prepared by M Sutherland, NGH Environmental, 21/12/2017. • Type A, typical floodway design cross section and long section (Drawing WAD120189). • ERSED Plan for Access Roads. • Generic turbine ERSED plans for Turbine 	NC	<p>RECOMENDATION: CATCON to re-assess existing and planned areas with exposed soils and determine corrective actions and future controls required to address compliance with the requirements for Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008) on sites. Controls currently listed within the Sediment and Erosion Control Plan are to be re-visited and implemented, including provision of progressive sediment erosion control plans specific to work areas and the implementation of controls listed in these plans.</p>
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E14	Deleted under Mod 4.	N/A	N/A	
E15	Deleted under Mod 4.	N/A	N/A	
	Traffic and Transport Impacts.			
E16	<p>Unless otherwise agreed by the Secretary, the Proponent shall commission an independent, qualified person or team to undertake the following in consultation with the relevant road authority:</p> <p>a) prior to the commencement of construction, review the proposed route and existing access provisions to the Wind Farm site to determine whether the route and existing provisions allow for safe access of construction and operational vehicles associated with the Project (including appropriate site distances [specifically at the intersection of Goolma Road and Gillinghall Road], appropriate setback of gate(s) at property entry and exit locations to ensure safety for other road users and provisions for over-mass or over-dimensional transport and safety with other</p>	<p>Non-Compliance: NSW DPE Compliance Report, February 2018 provides the following summary:</p> <p><i>“Official Caution issued to Civil and Allied Technical Construction Pty Ltd (Bodangora Wind Project, Project Approval 10_0157, Dubbo Regional Council LGA)</i></p> <p><i>On 9 February 2018, the Department issued an Official Caution to Civil and Allied Technical Construction Pty Ltd (Catcon) for failing to upgrade the intersection of Gillinghall and Goolma Roads prior to the commencement of construction. The Department’s investigation identified that construction activities had commenced on site and the intersection upgrade had not been completed. Without the road upgrade, there were potential</i></p>	NC	<p>Recommendation: Works to address this non-compliance are complete. Sighted RMS sign off, dated 23/03/2018, of completed corrective action with requirement for 24 month warranty period.</p>

	<p>road users). Where improvements or changes to the proposed route are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent; and</p> <p>b) assess all roads proposed to be used for over-mass and/ or over-dimensional transport (including intersections, bridges, culverts and other road features) prior to the commencement of construction to determine whether the existing road condition can accommodate the proposed over-mass and/or over-dimensional haulage. Where improvements are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of construction and at the full expense of the Proponent.</p> <p>Upon determining the haulage route(s) for construction vehicles associated with the Project, and prior to construction, undertake a Road Dilapidation Report. The Report shall assess the current condition of the road(s) and describe mechanisms to restore any damage that may result due to traffic and transport related to the construction of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage.</p> <p>Within three months of completion of construction, a subsequent Report shall be prepared to assess any damage that may have resulted from the construction of the Project (including mechanisms to restore any damage) and submitted to relevant road authority for review.</p> <p>Measures undertaken to restore or reinstate roads affected by the Project shall be undertaken in accordance with the reasonable requirements of the relevant road authority (including timing requirements), and at the full expense of</p>	<p><i>safety and capacity issues at the intersection. The intersection upgrade works have now been completed, subject to warranty period”.</i></p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE Compliance Report, February 2018, including above summary of official caution. • TDG Traffic Study, July 2017. (TDG Ref: 14638 ts-final v3. Which assessed the proposed route, road dilapidation survey and traffic assessment. • REX J Andrews Engineered Transportation Traffic Management Plan V02 12/12/17, that identifies requirements on the route. • Major WAD signed RMS for the Gillingham and Goolma Road Intersection. • RMS Accepted drawings for the Goolma Road – Gillinghall Road Intersection Upgrade – Accepted for construction 08/02/2018 by R.C. RMD Western Project Engineer. • NSW RMS approval to commence construction within the State Road Reserve (SF2017/249220/1) dated 12/02/2018. • CATCON Non-conformity Report 14/03/2018 regarding the finished road. • Client (RMS) sign off, dated 23/03/2018, of completed corrective action with requirement for 24 month warranty period. 		
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	the Proponent.			
	Ancillary Facilities			
E17	<p>Unless otherwise approved by the Secretary, the location of Ancillary Facilities shall:</p> <ul style="list-style-type: none"> a) be located more than 50 metres from a waterway; b) be located within or adjacent to the Project; c) have ready access to the road network; d) be located to minimise the need for heavy vehicles to travel through residential areas; e) be sited on relatively level land; f) be separated from nearest residences by at least 200 metres; g) not require vegetation clearing beyond that already required by the Project; h) not impact on heritage sites (including areas of archaeological sensitivity) beyond those already impacted by the Project; i) not unreasonably affect the land use of adjacent properties; j) be above the 20 ARI flood level unless a contingency plan to manage flooding is prepared and implemented; and k) provide sufficient area for the storage of raw materials to minimise, to the greatest extent practical, the number of deliveries required outside standard construction hours. <p>The location of the Ancillary Facilities shall be identified in the Construction Environmental Management Plan required under condition E20 and include consideration of the above criteria. Where the above criteria cannot be met for any proposed Ancillary Facility, the Proponent shall demonstrate to the satisfaction of the Secretary that there will be no significant adverse impact from that facility's construction or operation. Such assessment(s) can be submitted separately</p>	<p>Ancillary Facility assessments are undertaken by Catcon and records are maintained.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Construction Compound and Ancillary Facilities Management Plan (CCAFMP) Final V3 MOD 4 <p>Two new ancillary facilities are established on site in addition to those already nominated in the CCAFMP.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • AFMP 005 laydown south of pad 33 adjacent access roads to substation. • AFMP 006 crib areas south of pad 24. • Approval by ER dated <p>Sighted ER approval of 002, 003, and 004 (email dated 10/04/2018).</p> <p>Opportunity for improvement: The most current AFMP (005 & 006) are not currently included in the CEMP, however it is noted that this is CEMP (Rev 3) is currently submitted to the Department for approval. The approved AFMP are to be included in the CEMP post approval.</p>	OFI	Recommendation: The approved AFMP (005 and 006) are to be included in the revised CEMP post approval by NSW DPE.

	or as part of the Construction Environmental Management Plan.			
E18	All construction ancillary facility sites shall be rehabilitated to at least their preconstruction condition, unless otherwise agreed by the affected landowner	N/A no rehabilitation has been completed at the ancillary facilities.	N/A	
	Environmental Representative			
E19	<p>Prior to the commencement of construction of the Project, or as otherwise agreed by the Secretary, the Proponent shall nominate for the approval of the Secretary a suitably qualified and experienced Environment Representative(s) that is independent of the design and construction personnel. The Proponent shall employ the Environmental Representative(s) for the duration of construction and operation, or as otherwise agreed by the Secretary. The Environment Representative(s) shall:</p> <ul style="list-style-type: none"> a) be the principal point of advice in relation to the environmental performance of the Project; b) monitor the implementation of environmental management plans and monitoring programs required under this Approval and advise the Proponent upon the achievement of these plans/ programs; c) have responsibility for considering and advising the Proponent on matters specified in the conditions of this Approval, and other licences and approvals related to the environmental performance and impacts of the Project; d) ensure that environmental auditing is undertaken in accordance with the Proponent's Environmental Management System(s); e) be given the authority to approve /reject minor amendments to the Construction Environment Management Plan. What constitutes a "minor" 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Infigen letter to NSW DPE dated 08/12/2016 seeking approval of nominated Environmental Representative. • NSW DPE letter to Infigen dated 14/12/2016 approving nominated Environmental Representative. • Infigen letter to NSW DPE dated 23/08/2018 seeking approval of alternative environmental representative. d approval of nominated Environmental Representative. • NSW DPE letter to Infigen dated 26/03/2018 approving nominated alternative Environmental Representative. 	C	

	<p>amendment shall be clearly explained in the Construction Environmental Management Plan required under condition E20;</p> <p>f) be given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur; and</p> <p>g) be consulted in responding to the community concerning the environmental performance of the Project where the resolution of points of conflict between the Proponent and the community is required.</p>			
	Construction Environment Management Plan			
E20	<p>Prior to the commencement of construction, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement (following approval) a Construction Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be followed during construction, and shall be prepared in consultation with the relevant government agencies (including Council), and in accordance with the Guideline for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <p>a) a description of activities to be undertaken during construction of the Project (including staging and scheduling);</p> <p>b) statutory and other obligations that the Proponent is required to fulfil during construction, including approvals I consents, consultations and agreements</p>	<p>Non-conformance: The following non-conformances were identified against the implementation of the Construction Environmental Management Plan:</p> <ol style="list-style-type: none"> 1. Environmental Work Method Statements have not been created (CEMP Section 4.1.3). 2. Progressive Erosion Sediment Control Plans not prepared (CEMP Section 4.1.4). 3. Weekly inspections not completed (CEMP Section 8.1). 4. Internal audit report not completed as planned, i.e. within 3 months of commencement of construction (CEMP Section 8.3.3). <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 	NC	<p>Recommendation: Review requirements of the CEMP and ensure processes are established for the effective implementation of these requirements.</p> <p>Future consideration to be given to ensuring the CEMP is concise and adequately written to clearly describe what will be completed, when, by whom and what records will be maintained.</p>

	<p>required from authorities and other stakeholders under key legislation and policies;</p> <p>c) a description of the roles and responsibilities for relevant employees involved in the construction of the Project, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors are aware of their environmental and compliance obligations under these Conditions of Approval;</p> <p>d) an environmental risk analysis to identify the key environmental performance issues associated with the construction phase; and</p> <p>e) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts (including any impacts arising from the staging of the construction of the Project). In particular, the following environmental performance issues shall be addressed in the Plan:</p> <ul style="list-style-type: none"> i. compounds and ancillary facilities management; ii. noise and vibration; iii. traffic and access; iv. soil and water quality and spoil management; v. air quality and dust management; vi. management of Aboriginal and non-Aboriginal heritage; vii. soil contamination, hazardous material and waste management; viii. management of ecological impacts; and ix. hazard and risk management <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of construction, or as otherwise agreed by the Secretary.</p> <p>The Plan may be prepared in stages, however, construction works for each stage shall not commence until written</p>	<p>28/06/2017 approving the construction environmental management plan.</p> <ul style="list-style-type: none"> • Environmental Representative Audit of Construction Environmental management plan (23/01/2018), which identified a few findings relating to heritage, sediment and erosion. These are transferred and tracked through a QSE improvement register. • Project Risk Register (last reviewed 01/06/2018). • Weather data is being maintained by Catcon for January – June 2018. • Site inspections record for: <ul style="list-style-type: none"> - WTG 3 (05/05/18) - General site inspection (10/05/18) - Area 16 and PAD 24 (06/06/18) - Boom Log and PAD 14 (14/06/18). 		
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	<p>approval has been received from the Secretary.</p> <p>The approval of a Construction Environmental Management Plan does not relieve the Proponent of any requirement associated with this Approval. If there is an inconsistency with an approved Construction Environmental Management Plan and the conditions of this Approval, the requirements of this Approval prevail.</p>			
E21 (a)	<p>As part of the Construction Environmental Management Plan for the Project required under condition E20 the Proponent shall prepare and implement:</p> <p>(a) Construction Compound and Ancillary Facilities Management Plan to detail the management of construction ancillary facilities associated with the Project. The Plan shall include but not be limited to:</p> <ol style="list-style-type: none"> i. a description of the facility, its components and the surrounding environment; ii. details of the activities to be carried out at each facility, including the hours of use and the storage of dangerous and hazardous goods; iii. an assessment against the locational criteria outlined in condition E17; iv. details of the mitigation and management procedures specific to the facility that would be implemented to minimise environmental and amenity impacts, and an assessment of the adequacy of the mitigation or offsetting measures; v. identification of the timing for the completion of activities at the facility and how the site will be decommissioned (including any necessary rehabilitation); and vi. mechanisms for the monitoring, review and amendment of this Plan. 	<p>Note: Evidence of implementation was based on the information obtained during the review of each condition of the Project Approval.</p> <p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Compound and Ancillary Facilities Management Plan. <p>Refer to Condition E17 for notes on Ancillary Facilities.</p>	C	

E21 (b)	<p>(b) a Construction Noise and Vibration Management Plan to detail how construction noise and vibration impacts will be minimised and managed. The Plan shall be consistent with the guidelines contained in the Interim Construction Noise Guidelines (DECC, 2009) and shall include, but not be limited to:</p> <ol style="list-style-type: none"> I. identification of sensitive receivers and relevant construction noise and vibration goals applicable to the Project stipulated in this approval; II. details of construction activities and an indicative schedule for construction works, including the identification of key noise and I or vibration generating construction activities (based on representative construction scenarios, including at ancillary facilities) that have the potential to generate noise and I or vibration impacts on surrounding sensitive receivers; III. identification of feasible and reasonable measures proposed to be implemented to minimise and manage construction noise and vibration impacts (including construction traffic noise impacts). IV. procedures and mitigation measures to ensure relevant vibration and blasting criteria are achieved, including a suitable blast program, applicable buffer distances for vibration intensive works, use of low-vibration generating equipment I vibration dampeners or alternative construction methodology, and pre- and post- construction dilapidation surveys of sensitive structures where blasting and I or vibration is likely to result in damage to buildings and structures (including surveys being undertaken immediately following monitored exceedance of the criteria); V. a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Noise and Vibration Management Plan. <p>Refer to Condition E4, E7 and E8 for notes on noise and vibration.</p>	C	
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	<p>this monitoring would be conducted, the locations where monitoring would take place, how the results of this monitoring would be recorded and reported, and, if any exceedance is detected, how any non-compliance would be rectified;</p> <p>VI. an out-of-hours work (OOHW) protocol for the assessment, management and approval of works outside of standard construction and decommissioning hours as defined in condition E4, including a risk assessment process under which an Environmental Representative may approve out-of-hour construction activities deemed to be of low environmental risk and refer high risk works for the Secretary's approval. The OOHW protocol shall detail standard assessment, mitigation and notification requirements for high and low risk out-of-hour works, and detail a standard protocol for referring applications to the Secretary; and</p> <p>VII. mechanisms for the monitoring, review and amendment of this Plan.</p>			
E21 (c)	<p>a Construction Traffic and Access Management Plan to manage construction traffic and access impacts of the Project. The Plan shall be developed in consultation with the relevant road authority and shall include, but not necessarily be limited:</p> <p>I. identification of construction traffic routes and construction traffic volumes (including heavy vehicle I spoil haulage I material haulage) on these routes;</p> <p>II. details of vehicle movements for construction sites and site compounds including parking, dedicated vehicle turning areas, and ingress and egress points;</p> <p>III. identification of construction impacts that could result in disruption of traffic, public transport, pedestrian and cycle access, property access, including details of oversize load movements;</p>	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Traffic and Access Management Plan. <p>No construction traffic issues were observed during the audit site inspection.</p> <p>Refer to Condition E16 for NON-CONFORMANCE and notes on traffic management.</p>	NC	

	<p>IV. details of management measures to minimise traffic impacts, including temporary road work traffic control measures, onsite vehicle queuing and parking areas and management measures to minimise peak time congestion, and measures to ensure safe pedestrian and cycle access;</p> <p>V. a response plan which sets out a proposed response to any traffic, construction or other incident; and</p> <p>VI. mechanisms for the monitoring, review and amendment of this Plan.</p>			
E21 (d)	<p>Construction Soil and Water Quality Management Plan to manage surface and groundwater impacts during construction of the Project. The plan shall be developed in consultation with DPI - Water and Wellington Shire Council and include, but not necessarily be limited to:</p> <p>I. details of construction activities and their locations, which have the potential to impact on water courses, storage facilities, stormwater flows, and groundwater</p> <p>II. surface water and ground water impact assessment criteria consistent with Australian and New Zealand Environment Conservation Council (ANZECC) guidelines;</p> <p>III. management measures to be used to minimise surface and groundwater impacts, including details of how spoil and fill material required by the Project will be sourced, handled, stockpiled, reused and managed, erosion and sediment control measures, and the consideration of flood events;</p> <p>IV. management measures for contaminated material and a contingency plan to be implemented in the case of unanticipated discovery of contaminated material during construction;</p> <p>V. a description of how the effectiveness of these</p>	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Soil and Water Management Plan. <p>Spoil Management Plan, which includes location of stock pile, quantity, nature of stockpile, source / origin, disposal / usage solution, description.</p> <p>Refer to Condition E13 for NON-CONFORMANCE and notes on soil and water management.</p>	NC	

	<p>actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be undertaken, the locations where monitoring would take place, how the results of the monitoring would be recorded and reported, and, if any exceedance of the criteria is detected how any non-compliance can be rectified; and</p> <p>VI. mechanisms for the monitoring, review and amendment of this Plan.</p>			
E21 (e)	<p>a Construction Heritage Management Plan to detail how construction impacts on Aboriginal and Historic heritage will be minimised and managed. The Plan shall be developed in consultation with the OEH and registered Aboriginal stakeholders (for Aboriginal heritage), and include, but not necessarily be limited to:</p> <p>I. in relation to Aboriginal Heritage:</p> <ul style="list-style-type: none"> • details of further investigation and identification of Aboriginal cultural heritage sites within the Project area; • details of management measures to be carried out in relation to Aboriginal heritage, including a detailed methodology and strategies for protection, monitoring, and conservation, of sites and items associated with the Project; • procedures for dealing with previously unidentified Aboriginal objects (excluding human remains) including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can re-commence by a suitably qualified archaeologist in consultation with the Department, OEH and registered Aboriginal stakeholders, and assessment of the consistency of any new Aboriginal heritage impacts against the approved impacts of the Project, and registering of 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Heritage Management Plan. <p>Refer to Condition E2 for NON-CONFORMANCE and notes on heritage management.</p>	NC	

	<p>the new site in the OEH's Aboriginal Heritage Information Management System (AHIMS) register;</p> <ul style="list-style-type: none"> • procedures for dealing with human remains, including cessation of works in the vicinity and notification of the Department, NSW Police Force, OEH and registered Aboriginal stakeholders and not recommencing any works in the area unless authorised by the Department and I or the NSW Police Force; • heritage training and induction processes for construction personnel (including procedures for keeping records of inductions) and obligations under the conditions of this Approval and National Parks and Wildlife Act 1974 (where relevant) including site identification, protection and conservation of Aboriginal cultural heritage; • procedures for ongoing Aboriginal consultation and involvement for the duration of the Project, and ensure that the Wellington Local Aboriginal Land Council (administrator) is kept informed of the process; and mechanisms for the monitoring, review and amendment of this plan <p>II. in relation to Historic Heritage:</p> <ul style="list-style-type: none"> • identification of heritage items directly and indirectly affected by the Project; • details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and I or measures to protect unaffected sites during construction works in the vicinity); • procedures for dealing with previously unidentified heritage objects, (including cessation of works in the vicinity, assessment of the significance of the item(s) and determination of appropriate mitigation measures including when works can recommence by 			
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	<p>a suitably qualified and experienced archaeologist in consultation with the Heritage Branch of OEH and the Department, and assessment of the consistency of any new heritage impacts against the approved impacts of the Project;</p> <ul style="list-style-type: none"> • heritage training and induction processes for construction personnel (including procedures for keeping records of inductions and obligations under the Heritage Act 1977 and these conditions including site identification, protection and conservation of non-Aboriginal cultural heritage; and • mechanisms for the monitoring, review and amendment of this plan. 			
E21 (f)	<p>A Construction Biodiversity Management Plan to detail how construction impacts on biodiversity will be minimised and managed . This plan must be prepared in consultation with OEH and must:</p> <ol style="list-style-type: none"> I. include baseline mapping of the vegetation communities and key fauna habitat on the site, including detailed maps of the transmission line corridor; II. clearly identify the areas on site that would be disturbed; III. include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the impacts on fauna on site, including minimising impacts on tree hollows, undertaking pre-clearance surveys and maintaining a vegetation clearance register; • managing potential indirect impacts on threatened flora and fauna species 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Biodiversity Management Plan. <p>Revegetation based on completed works – 45 – 50 ha. Project Engineer is monitoring the re-seeding of paddocks through mapping.</p> <p>A register of paddocks has been established, which includes details on paddock, landowner, seed mix type and ha treated.</p> <p>Refer to Condition C7 for notes on additional information.</p>	C	

	<ul style="list-style-type: none"> rehabilitating and revegetating temporary disturbance areas; protecting vegetation and fauna habitat outside the approved disturbance areas; maximising the salvage of resources from within the approved disturbance area - including vegetative and soil resources - for beneficial reuse (including fauna habitat enhancement) during the rehabilitation and revegetation of the site; controlling weeds and feral pests; controlling erosion; controlling access; and bushfire management; and <p>IV. include a detailed program to monitor and report on the effectiveness of the above measures.</p>			
E21 (g)	<p>a Construction Air Quality Management Plan to detail how construction impacts on air quality will be minimised and managed. The Plan shall include, but not necessarily be limited to:</p> <ol style="list-style-type: none"> the identification of potential sources of dust; dust management objectives; mitigation measures to be implemented, including measures during weather conditions where high dust level episodes are probable (such as strong winds in dry weather); a monitoring program to assess compliance with the identified objectives; and mechanisms for the monitoring, review and amendment of this Plan. 	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> NSW DPE letter to Infigen dated 28/06/2017 approving the construction environmental management plan, including Construction Air Quality Management Plan. <p>Refer to Condition E1 for notes on dust and air quality.</p>	C	
	Schedule F: Operational Environmental Management			
	Bushfire Risk			

F1	Throughout the operational life of the Project, the Proponent shall regularly consult with the RFS to ensure its familiarity with the Project. The Proponent shall comply with any reasonable request of the RFS to reduce the risk of bushfire and to enable fast access in emergencies.	Not yet triggered.	N/A	-
	Safety Management System			
F2	At least two months prior to the commencement of commissioning, the Proponent shall prepare a report outlining a comprehensive Safety Management System, covering all on-site systems relevant to ensuring the safe operation of the Project. The System shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept at the site and shall be available for inspection by the Department upon request. The Safety Management System shall 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"> a) procedures and programs for the maintenance and testing of the safety related equipment to ensure its integrity over the life of the Project; and b) an outline of a documented procedure for the management of change. 	Not yet triggered.	N/A	-
	Television and Radio Interference			
F3	Prior to the commencement of commissioning of the Project, the Proponent shall undertake an assessment of the existing quality of the television / radio transmission available at a representative sample of receivers located within five kilometres of any wind turbine.	Not yet triggered.	N/A	-

F4	<p>In the event of a complaint from a receptor located within five kilometres of a wind turbine regarding television/ radio transmission during the operation of the Project, the Proponent shall investigate the quality of transmission at the receptor compared with the pre-commissioning assessment and where any transmission problems can be reasonably attributable to the Project, rectify the problems within three months of the receipt of the complaint, through the implementation of measures including:</p> <ul style="list-style-type: none"> a) modification to or replacement of receiving antenna; b) installation and maintenance of a parasitic antenna system; c) provision of a land line between the affected receptor and an antenna located in an area of favourable reception; and/ or d) other feasible measures. <p>If interference cannot be overcome by the measures outlined in (a) to (d), the Proponent shall negotiate with the impacted landowner(s) about installing and maintaining a satellite receiving antenna. The Proponent shall be responsible for all costs associated with any such mitigation measures.</p>	Not yet triggered.	N/A	-
Rehabilitation and Revegetation.				
F5	<p>Disturbance to watercourses and/ or associated riparian vegetation shall be rehabilitated to a standard equal to or better than the existing condition in consultation with the DPI - Water and DPI (Fisheries) within six months of the cessation of construction activities at the relevant area. Any revegetation measures undertaken shall be monitored and maintained consistent with the requirements of condition F6.</p>	Not triggered. Still working in these areas.	N/A	
F6	<p>The Proponent shall implement a revegetation and rehabilitation programme for all areas of the Project footprint which are disturbed during the construction of the</p>	<p>Opportunity for improvement: Infigen has not yet engaged or sought approval for an independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) for</p>	OFI	<p>Recommendation: The Proponent is to be consider and act on this requirement to ensure compliance with the requirements to engage an</p>

	Project, which are not required for the ongoing operation of the Project, including temporary construction facility sites and sections of construction access roads. The Proponent shall ensure that all revegetation measures are implemented progressively where possible and in all cases within six months of the cessation of construction activities at the relevant area. Unless otherwise agreed to by the Secretary, the Proponent shall monitor and maintain the health of all revegetated areas until such time that the plantings have been verified by an independent and suitably qualified expert (whose appointment has been agreed to by the Secretary) as being well established, in good health and self sustaining.	monitoring rehabilitation revegetation and rehabilitation has commenced on site.		independent and suitably qualified expert for monitoring of rehabilitation.
	Verification of Operational Noise			
F7	Prior to commissioning of the wind farm, the Proponent shall provide an updated prediction of wind farm noise levels at all non-associated residences or representative clusters of non-associated residences that will experience wind turbine noise greater than 35 dB(A) when turbines are operating at rated power. The report is to be prepared in consultation with the EPA and should meet the requirements set out in Appendix 2.	Operational noise report and evidence on file. Evidence sighted includes: <ul style="list-style-type: none"> Bodangora Wind Farm, Consolidated Environmental Noise Assessment, Sonus, January 2018. NSW EPA response (email dated 19/02/2018) outlining no concerns raised or comments on the noise verification report. 	C	-
	Operational Noise Criteria - Wind Turbine			
F8	The Proponent shall ensure that the noise generated by the operation of wind turbines does not exceed the greater of: <p>(d) 35 dB(A); or</p> <p>(e) the existing background noise level for each integer wind speed from cut-in speed to the rated power of the wind turbine generators, by more than 5 dB(A).</p> <p>Unless otherwise replaced by an equivalent NSW wind farm noise guideline, noise generated by the project is to be</p>	Not yet triggered.	N/A	-

	<p>measured in accordance with the relevant requirements of Sections 3.1 and 3.2 of the South Australian Environment Protection Authority's Wind Farms Environmental Noise Guidelines 2009, as modified by the provisions in Appendix 3.</p> <p>However, these criteria do not apply if the Proponent has an agreement with the owners of the relevant residence or land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement.</p>			
	Operational Noise Criteria - Ancillary Infrastructure			
F9	<p>The Proponent shall ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) L Aeq(1s minute) at any non-associated residence. Noise generated by the project is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (as may be updated from time-to-time), as modified by the provision in Appendix 3.</p> <p>However, these criteria do not apply if the Proponent has an agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Proponent has advised the Department in writing of the terms of this agreement</p>	Not yet triggered.	N/A	-
	Operating Conditions			
F10	<p>The Proponent shall:</p> <p>(a) implement best management practice to minimise the construction, operational, decommissioning and road traffic noise and vibration of the project; NSW Government 28 Department of Planning and Environment</p> <p>(b) implement sector management of wind turbines to manage any wind directions or meteorological</p>	Not yet triggered.	N/A	-

	<p>conditions that are found to result in exceedances of the noise criteria in condition F8;</p> <p>(c) undertake noise monitoring within 3 months of the commissioning of the wind farm, or other timing as may be agreed by the Secretary, to determine whether the project is complying with the relevant conditions of this approval; and</p> <p>(d) carry out further noise monitoring if required by the Secretary, to the satisfaction of the Secretary.</p>			
F11 to F18	Deleted following Modification 1	Not applicable.	N/A	-
F19	<p>Prior to the commencement of operation, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement {following approval) an Operation Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be followed during operation, and shall be prepared in consultation with relevant agencies and in accordance with the Guideline for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <p>(a) a description of activities to be undertaken during operation of the Project (including staging and scheduling);</p> <p>(b) statutory and other obligations that the Proponent is required to fulfil during operation, including approval I consents, consultations and agreements required from authorities and other stakeholders under key legislation and policies;</p> <p>(c) overall environmental policies, guidelines and principles to be applied to the operation of the Project;</p> <p>(d) a description of the roles and responsibilities for relevant employees involved in the operation of the</p>	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Bodangora Wind Farm – Operational Environmental Management Plan, V1.0, Infigen Energy, March 2018. • Infigen letter to NSW DPE for submission of Operational Environmental Management Plan. <p>No response received from NSW DPE with regard to approval of this plan.</p> <p>Note: Due to time limitations this plan was not reviewed during the audit.</p>	C	-

	<p>Project, including relevant training and induction provisions for ensuring that employees are aware of their environmental and compliance obligations under these Conditions of Approval;</p> <ul style="list-style-type: none"> (e) an environmental risk analysis to identify the key environmental performance issues associated with the operation phase of the Project; and (f) details of how environmental performance would be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts, including those safeguards and mitigation measures detailed in the EA (and any impacts arising from the staging of the construction of the Project); and (g) details of how sector management would be used to ensure that operational noise criteria are not exceeded. <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of operation, or as otherwise agreed by the Secretary.</p> <p>Operation shall not commence until written approval has been received from the Director General. Upon receipt of the Secretary's approval, the Proponent shall make the Plan publicly available as soon as practicable.</p> <p><i>Note: The approval of an Operation Environmental Management does not relieve the Proponent of any other requirement associated with this Project Approval. If there is an inconsistency with an approved Operation Environmental Management Plan and the conditions of this project approval the requirements of this project approval prevail.</i></p>			
F20	Deleted following Modification 1	Not applicable.	N/A	-
	Schedule G: Decommissioning			

<p>G1</p>	<p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Proponent shall rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 2.</p> <p><i>Table 2: Rehabilitation Objectives</i></p> <table border="1" data-bbox="286 359 945 710"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Project site (as a whole)</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible </td> </tr> <tr> <td>Revegetation</td> <td> <ul style="list-style-type: none"> Restore native vegetation generally as identified in the EA </td> </tr> <tr> <td>Above ground wind turbine infrastructure (excluding wind turbine pads)</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise </td> </tr> <tr> <td>Wind turbine pads</td> <td> <ul style="list-style-type: none"> To be covered with soil and/or rock and revegetated </td> </tr> <tr> <td>Above ground ancillary infrastructure (excluding the transmission line)</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary </td> </tr> <tr> <td>Internal access roads</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary </td> </tr> <tr> <td>Land use</td> <td> <ul style="list-style-type: none"> Restore or maintain land capability as described in the EA </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety </td> </tr> </tbody> </table> <p>This condition does not apply to any infrastructure which, as at the relevant date, is owned by a network operator under the Electricity Supply Act 1995 (NSW) (or any equivalent provisions which are in force as at the relevant date).</p>	Feature	Objective	Project site (as a whole)	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible 	Revegetation	<ul style="list-style-type: none"> Restore native vegetation generally as identified in the EA 	Above ground wind turbine infrastructure (excluding wind turbine pads)	<ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise 	Wind turbine pads	<ul style="list-style-type: none"> To be covered with soil and/or rock and revegetated 	Above ground ancillary infrastructure (excluding the transmission line)	<ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary 	Internal access roads	<ul style="list-style-type: none"> To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary 	Land use	<ul style="list-style-type: none"> Restore or maintain land capability as described in the EA 	Community	<ul style="list-style-type: none"> Ensure public safety 	<p>Not yet triggered.</p>	<p>N/A</p>	<p>-</p>
Feature	Objective																					
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Community	<ul style="list-style-type: none"> Ensure public safety 																					
<p>G2</p>	<p>The Proponent must:</p> <p>(a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</p> <p>(b) minimise the total area exposed at any time; and</p> <p>(c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	<p>Sighted areas of rehabilitation including completed turbine sites and underground cable trenches.</p>	<p>N/A .</p>	<p>-</p>																		
<p>G3</p>	<p>Prior to the cessation of operations, the Proponent shall prepare a detailed Decommissioning Plan for the Project to the satisfaction of the Secretary. This plan must outline the</p>	<p>Not yet triggered.</p>	<p>N/A</p>	<p>-</p>																		

	detailed measures that would be implemented to achieve the objectives in Table 2 above.			
G4	<p>Unless otherwise agreed by the Secretary, the Proponent shall commission an independent, qualified person or team to undertake the following in consultation with the relevant road authority:</p> <ul style="list-style-type: none"> (a) prior to the commencement of decommissioning, review the proposed route and existing access provisions to the Wind Farm Site to determine whether the route and existing provisions allow for safe access of decommissioning vehicles associated with the Project (including appropriate site distances and provisions for over-mass or over-dimensional transport and safety with other road users). Where improvements or changes to the proposed route are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of decommissioning and at the full expense of the Proponent; and (b) assess all roads proposed to be used for over-mass and I or over-dimensional transport (including intersections, bridges, culverts and other road features) prior to the commencement of decommissioning to determine whether the existing road condition can accommodate the proposed over-mass and I or over-dimensional haulage. Where improvements are required, the Proponent shall implement these in consultation with the relevant road authority, prior to the commencement of decommissioning and at the full expense of the Proponent. <p>Upon determining the haulage route(s) for decommissioning vehicles associated with the Project, and prior to decommissioning, undertake a Road Dilapidation Report. The Report shall assess the current condition of the road(s) and</p>	Not yet triggered.	N/A	-

	<p>describe mechanisms to restore any damage that may result due to traffic and transport related to the decommissioning of the Project. The Report shall be submitted to the relevant road authority for review prior to the commencement of haulage.</p> <p>Within three months of completion of decommissioning, a subsequent Report shall be prepared to assess any damage that may have resulted from the construction of the Project (including mechanisms to restore any damage) and submitted to relevant road authority for review.</p> <p>Measures undertaken to restore or reinstate roads affected by the Project shall be undertaken in accordance with the reasonable requirements of the relevant road authority (including timing requirements), and at the full expense of the Proponent.</p>			
G5	<p>Prior to the commencement of decommissioning, or as otherwise agreed by the Secretary, the Proponent shall prepare and implement (following approval) a Decommissioning Environmental Management Plan for the Project. The Plan shall outline the environmental management practices and procedures that are to be followed during decommissioning, and shall be prepared in consultation with the relevant agencies and in accordance with the Guideline for the Preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004). The Plan shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> (a) a description of activities to be undertaken during decommissioning of the Project (including staging and scheduling); (b) statutory and other obligations the Proponent is required to fulfil during decommissioning, including approval I consents, consultations and agreements required from authorities and other stakeholders 	Not yet triggered.	N/A	-

	<p>under key legislation and policies;</p> <p>(c) a description of the roles and responsibilities for relevant employees involved in the decommissioning of the Project, including relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors are aware of their environmental and compliance obligations under these Conditions of Approval;</p> <p>(d) an environmental risk analysis to identify the key environmental performance issues associated with the decommissioning phase; and</p> <p>(e) details of how environmental performance will be managed and monitored to meet acceptable outcomes, including what actions will be taken to address identified potential adverse environmental impacts (including any impacts arising from the staging of the decommissioning of the Project). In particular, the following environmental performance issues shall be addressed in the Plan:</p> <ul style="list-style-type: none"> I. compounds and ancillary facilities management; II. noise and vibration; III. traffic and access; IV. soil and water quality and spoil management; V. air quality and dust management; VI. hazardous material and waste management; and VII. hazard and risk management, including bushfire risk. <p>The Plan shall be submitted for the approval of the Secretary no later than one month prior to the commencement of decommissioning, or as otherwise agreed by the Secretary. The Plan may be prepared in stages, however, decommissioning works shall not commence until written approval has been received from the Secretary.</p>			
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	End of Project Approval Checklist.			
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Definition of Compliance Status

C	Compliant
NC	Non-compliant – Recommendation identified.
OFI	Opportunity for improvement – Recommendation identified.
N/A	Not determined. Condition not applicable to phase of works. i.e. condition not yet triggered.

Environmental Protection Licence Audit Checklist

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
1	Administrative Conditions			
A1	What the licence authorises and regulates			
A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2: Construction of 33 wind turbines and associated infrastructure as approved by Department of Planning and Environment on 30 August 2013 (Ref: MP 10_0157).	Evidence of construction of 33 turbines and associated infrastructure was observed during the audit site inspection.	C	
A1.2	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	Not yet triggered.	N/A	-

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	<p>Scheduled activity: Electricity generation</p> <p>Fee based activity: Electricity works (wind farms)</p> <p>Scale: 0 – 450 GWh annual generating capacity.</p>			
A1.3	The licensee is prohibited from carrying out the scheduled activities identified at condition A1.2 during the undertaking of the scheduled development work identified at condition A1.1.	No evidence to the contrary observed during audit site inspection and during subsequent interviews with Project personnel.	C	
A2	Premises or plant to which this licence applies			
A2.1	Bodangora Wind Farm, Bodangora NSW 2820. APPROXIMATELY TWO KM NORTH-EAST OF BODANGORA AND 15 KM NORTH-EAST OF WELLINGTON, IN THE DUBBO REGIONAL COUNCIL. PROJECT AREA DEPICTED IN DOCUMENT TITLED "BODANGORA WIND FARM PROJECT OVERVIEW" (REFERENCE DOC17/249564).			
A3	Other activities			
A3.1	<p>This licence applies to all other activities carried on at the premises, including:</p> <ul style="list-style-type: none"> • Chemical storage • Concrete works • Crushing, grinding or separating • Extractive activities • Sewage treatment. 			
A4	Information supplied to the EPA			
A4.1	Works and activities must be carried out in accordance with the proposal contained in the	Refer to notes throughout this audit. Non-conformances are recorded, however considered	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	<p>licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	compliant with the intent of this condition.		
2	Discharges to Air and Water and Applications to Land			
P1	Location of monitoring/discharge points and areas			
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.			
P1.2	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <p>EPA Identification 1: Meteorological station. Western meteorological mast located on Bodangora Wind Farm.</p> <p>EPA Identification 2: Meteorological station. Eastern meteorological mast located on Bodangora Wind</p>	<p>The Eastern Mast remains in place.</p> <p>The Western Mast has been re-located to PAD 5.</p> <p>The Department was advised of the Met Masts relocation under MOD 3.</p>	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	Farm.			
3	Limit conditions			
L1	Pollution of waters			
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Nil recorded.	C	
L2	Waste			
L2.1	The licensee must ensure that all liquid and/or non-liquid waste generated and/or stored on the site is assessed and classified in accordance with <i>Waste Classification Guidelines Part 1: Classifying Waste</i> (NSW EPA, 2014) or any future guideline that may supersede that document.	Refer to Condition C28 – C 31 in the Project Approval conditions audit.	C	
L2.2	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Nil reportedly received.	C	
L3	Noise limits			
L3.1	The proponent must prepare and submit a detailed Construction Noise Management Plan to the EPA, prior to commencement of construction activities, including but not necessarily limited to: <ul style="list-style-type: none"> • identification of each work area, site compound 	Appendix E of the Construction Noise and Vibration Management Plan captures details of consultation with the EPA regarding submission and approval of the plan, including EPA comments and Infigen’s response.	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	<p>and access route (both private and public);</p> <ul style="list-style-type: none"> • identification of the specific activities that will be carried out and associated noise sources at the premises and access routes; • identification of all potentially affected sensitive receivers; • the construction noise and vibration objectives identified in accordance with the <i>Interim Construction Noise Guideline and Assessing Vibration: A Technical Guideline</i>; • assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the established construction noise objectives; • where the objectives are predicted to be exceeded an analysis of all feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts; • description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction, including the early erection of operational noise control barriers. 			
L3.2	<p>The licensee must ensure that the noise generated by the operation of ancillary infrastructure does not exceed a limit of 35dB(A) LAeq (15 minute) at any non-associated residential premises.</p> <p>Noise generated by the operation of ancillary</p>	<p>Evidence sighted includes:</p> <ul style="list-style-type: none"> • Bodangora Wind Farm – Operational Environmental Management Plan, V1.0, Infigen Energy, March 2018. • Infigen letter to NSW DPE for submission of 	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	infrastructure is to be measured in accordance with the relevant requirements of the <i>NSW Industrial Noise Policy</i> .	<p>Operational Environmental Management Plan.</p> <p>No response received from NSW DPE with regard to approval of this plan.</p> <p>Note: Due to time limitations this plan was not reviewed during the audit.</p>		
L3.3	<p>The noise emission limits set out in condition L3.2 apply under all meteorological conditions except for the following:</p> <p>a) Wind speeds greater than 3 metres/second at 10 metres above ground level;</p> <p>b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or</p> <p>c) Stability category G temperature inversion conditions.</p>	Refer to notes under L3.2	N/A	
L3.4	<p>For the purposes of condition L3.3:</p> <p>a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and</p> <p>b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part 4E of Appendix E to the NSW Industrial Noise Policy.</p>	<p>Meteorological masts are available on site.</p> <p>This condition relates to operation and has not yet been triggered.</p>	N/A	
L3.5	<p>To determine compliance:</p> <p>a) with the Leq(15 minute) noise limits in condition L3.2, the noise measurement equipment must be</p>	Noise monitoring record sheets are maintained for a sample of night works when noise monitoring was undertaken for precaution only.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	located: <ul style="list-style-type: none"> • approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or • within 30 metres of a dwelling façade, but not closer than 3 metres, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable • within approximately 50 metres of the boundary of a National Park or a Nature Reserve. 	This condition relates to operation and has not yet been triggered.		
	b) with LAmx noise limits in condition L3.2, the noise measurement equipment must be located within 1 metres of a dwelling façade.	This condition relates to operation and has not yet been triggered.	N/A	
	c) with the noise limits in condition L3.2 the noise measurement equipment must be located: <ul style="list-style-type: none"> • at the most affected point at a location where there is no dwelling at the location; or • at the most affected point within an area at a location prescribed by conditions L3.5(a) or L3.5(b). 	This condition relates to operation and has not yet been triggered.	N/A	
	A non-compliance of condition L3.2 will still occur where noise generated from the premises in excess of the appropriate limit is measured: <ul style="list-style-type: none"> • at a location other than an area prescribed by conditions L3.5(a) and L3.5(b); and/or • at a point other than the most affected point at a location. 	This condition relates to operation and has not yet been triggered.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
L3.7	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measure by the noise monitoring equipment.	This condition relates to operation and has not yet been triggered.	N/A	
L4	Blasting			
L4.1	The airblast overpressure level from blasting operations at the premises must not exceed 120dB (Lin Peak) at any time at any noise sensitive locations. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	Catcon maintains a register of blasts data. Verified recent records for this blast including: Blast WTG-8-03 (third blast at site 8). Evidence sighted includes: <ul style="list-style-type: none">- CATCON Pre-blast check sheet completed 06/06/2018. Records include site photos pre-blast.	C	
L4.2	The airblast overpressure level from blasting operations at the premises must not exceed 115dB (Lin Peak) at any noise sensitive locations for more than five per cent of the total number of blasts over each reporting period. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	<ul style="list-style-type: none">- Blast report- Blast exclusions and environmental details, including location of monitoring.- Blast traffic plan (Area 16(01) 05/06/2018.- Sequal drill and blast hazard identify and risk control, blast design record and explosives transport cartnote.	C	
L4.3	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 10 mm/sec at any time at any noise sensitive locations. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	<ul style="list-style-type: none">- Monitoring results at residence (06/06/2018, Peak overpressure 113.8 dBL, which complies with the requirements. WTG 9-02 Evidence sighted includes: <ul style="list-style-type: none">• Catcon Pre-blast checksheet, 29/11/17	C	
L4.4	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed	<ul style="list-style-type: none">• Sequal drill and blast repor, including hazard identify and risk control, blast design	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	5mm/sec at any noise sensitive locations for more than five per cent of the total number of blasts over each reporting period. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.	<p>record and explosives transport cartnote.</p> <ul style="list-style-type: none"> Blast monitoring report 29/11/2017 with 119.0 dBL peak overpressure and peak vector sum velocity 0.37 mm/s. <p>Refer to finding raised in Project Approval Condition E8.</p>		
L4.5	<p>Blasting operations on the premises may only take place between:</p> <p>a) 9am and 5pm Monday to Friday; and</p> <p>b) 9am and 1pm Saturday.</p> <p>Blasting is not permitted on Sunday or public holidays.</p> <p>Blasting outside the hours specified in this condition can only take place with the written approval of the EPA.</p> <p>Note: The airblast overpressure and ground vibration levels in conditions L4.1 to L4.4 do not apply at noise sensitive locations that are owned by the licensee or subject to a private agreement, relating to airblast overpressure and ground vibration levels, between the licensee and land owner.</p>	All blasting has been undertaken between 9am and 5pm. Blast records are maintained.	C	
L5	Hours of operation			
L5.1	<p>Unless otherwise specified by any other condition of this licence, all construction activities are:</p> <p>a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday;</p> <p>b) restricted to between the hours of 8:00am and</p>	Refer to notes in Project Approval checklist – Condition E4.	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays.			
L5.2	<p>The categories of works that may be undertaken outside the recommended construction hours include:</p> <p>a) construction that causes LAeq (15 minute) noise levels that are;</p> <p>i) no more than 5dB above Rating Background Level at any residence in accordance with the <i>Interim Noise Guideline</i> (DECC, 2009); and</p> <p>ii) no more than the Noise Management Levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or</p> <p>b) for the delivery of materials required by the NSW Police Force or other authorities for safety reasons;</p> <p>c) where it is required in an emergency to avoid the loss of lives, property and/or prevent environmental harm; or</p> <p>d) as otherwise approved by the Secretary of the Department of Planning and Environment.</p>	Refer to notes in Project Approval checklist – Condition E4.	C	
L6	Potentially offensive odour			
L6.1	<p>The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.</p> <p>Note: Section 129 of the Protection of the</p>	Nil reported.	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour emitted in accordance with the conditions of a licence directed at minimising odour.			
L6.2	No condition of this license identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.	Nil reported.	C	
L7	Other limit conditions			
L7.1	In accordance with condition A1.3, the licensee is restricted to the generation of 0 GWh and the licensee must not operate any wind turbine and generate electricity. Note: This condition means that prior to commissioning any wind turbine to generate electricity, the licensee must make a licence variation application to the EPA to operate the constructed wind turbines to generate electricity. The licence application must be accompanied by the following management plans required by the Project Approval MP 10_0157: <ul style="list-style-type: none"> • Noise Verification Report; and • Operational Noise Management Plan. 	This condition has not been triggered. Audit conducted during construction. No electricity generation reported to date. Turbines not yet commissioned.	N/A	
4	Operating Conditions			

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
O1	Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	A site inspection was undertaken as part of this audit and included an inspection of the Site Compound. With the exception of the non-conformances raised in this audit, activities are generally considered to be undertaken in a competent manner.	C	
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Verified a sample of Daily Plant Inspection records. Also verified the competency of operators, including J.Lewis (Excavator) S.Smith (VOC) Telehandler. G.Duham (VO)C - excavator	C	
O3	Dust			
O3.1	Activities occurring at the premises must be carried out in a manner that will minimise emissions of dust from the premises. Trucks entering and leaving the premises that are carrying loads that may generate dust must be covered at all times, except during loading and unloading.	Refer to notes in Project Approval checklist – Condition E1. No trucks observed entering or exiting site.	C	
O3.2	All areas in or on the premises must be maintained in a condition that prevents or minimises the emission	Refer to notes in Project Approval checklist –	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	into the air of air pollutants (which includes dust).	Condition E1.		
O3.3	Any activity in or on the premises must be carried out by such practicable means as to prevent or minimise the emission into the air of air pollutants (which includes dust).	Refer to notes in Project Approval checklist – Condition E1.	C	
O3.4	Any plant in or on the premises must be operated by such practicable means as to prevent or minimise the emission into the air or air pollutants (which includes dust).	Verified a sample of Daily Plant Inspection records for plant observed on site during the audit site inspection. No excessive visible emission observed.	C	
O4	Processes and management			
O4.1	<p>The licensee must ensure all erosion and sediment control measures installed on the premises must be inspected and works undertaken to repair and/or maintain these controls: a) Weekly during normal construction hours outlined on Condition L5.1; and b) within 24 hours on a weekday, within 60 hours on a weekend, or once road is declared open, following the cessation of a rainfall event causing runoff to occur on or from the premises.</p> <p>The licence must record all such inspections including observations and works undertaken to repair and/or maintain erosion and sediment controls as nominated in Construction Soil and Water Quality Management Plan.</p>	<p>Refer to notes in Project Approval checklist – Condition E20.</p> <p>Non-Compliance: Inspections of erosion and sediment controls have not been undertaken (no records maintained).</p>	NC	Recommendation: Undertake inspections of erosion and sediment control measures as required EPL Condition O4.1 and ensure required records are maintained.
O4.2	The licensee must ensure all erosion and sediment controls are designed, constructed, operated and maintained in accordance with the guideline	Refer to notes and Non-Compliance in Project Approval checklist – Condition E13.	NC	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	"Managing Urban Stormwater - Soils and Construction: Volume 1" Landcom 2006.			
O5	Waste management			
O5.1	The licensee must record the type and volume of all waste generated at the premises and ensure waste is only transported to a premises that can lawfully receive the waste.	Refer to notes and Improvement Opportunity in Project Approval checklist – Condition C31.	OFI	
O6	Other operating conditions			
O6.1	The licensee must prepare and submit a Construction Environmental Management Plan (CEMP) to the EPA prior to the commencement of construction works at the premises.	Evidence of consultation with relevant agencies with regard to the CEMP is included in Appendix M of the CEMP	C	
O6.2	Bund Construction & Maintenance The Licensee must ensure that fuel and chemical storage areas have appropriate bunding. Bunds must be designed, constructed and maintained in accordance with the EPA Technical Guideline <i>Bunding and Spill Management</i> (found at http://www.epa.nsw.gov.au/mao/bundingspill.htm).	Refer to notes and Improvement Opportunity in Project Approval checklist – Condition C11.	OFI	
O6.3	A Construction Soil and Water Quality Management Plan (Plan) must be prepared for all aspects of the construction phase of the development and must be implemented. Implementation of the Plan must mitigate the impacts of stormwater runoff from and within the premises during construction. The Plan should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the scheme should be consistent with the	Refer to notes and Non-conformance in in Project Approval checklist Condition E13 and E21(d)	NC	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	guidance contained in Managing Urban Stormwater: Control Handbook (available from the EPA).			
5	Monitoring and Recording Conditions			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Not yet triggered.	N/A	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Not yet triggered.	N/A	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Not yet triggered.	N/A	
M2	Weather monitoring			
M2.1	At the point(s) identified below, the licensee must	Opportunity for improvement: Whilst the required	OFI	Recommendation: Infigen to review

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively. *REFER TO EPL for Table.	weather data is likely available it was not able to be produced at the time of the audit.		and assess availability and access to the required weather data and ensure it is monitored and records maintained.
M3	Recording of pollution complaints			
M3.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Refer to notes in Project Approval checklist Condition D2 and D3	C	
M3.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Refer to notes in Project Approval checklist Condition D2 and D3	C	
M3.3	The record of a complaint must be kept for at least 4 years after the complaint was made	Not yet triggered.	N/A	
M3.4	The record must be produced to any authorised	Records were available to the auditor.	C	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	officer of the EPA who asks to see them.			
M4	Telephone complaints line			
M4.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Refer to notes in Project Approval checklist Condition D2 and D3	C	
M4.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Refer to notes in Project Approval checklist Condition D2 and D3	C	
M4.3	The preceding two conditions do not apply until 29 June 2017 the date of the issue of this licence.	Refer to notes in Project Approval checklist Condition D2 and D3	C	
6	Reporting Conditions			
R1	Annual return documents			
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: <ol style="list-style-type: none"> 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to 	Not yet triggered. First Annual Return period ended during audit.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	<p>Publish Pollution Monitoring Data; and</p> <p>7. a Statement of Compliance - Environmental Management Systems and Practices.</p> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>			
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Not yet triggered. First Annual Return period ended during audit.	N/A	
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <p>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</p> <p>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</p>	Not yet triggered.	N/A	
R1.4	<p>Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:</p> <p>a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or</p> <p>b) in relation to the revocation of the licence - the</p>	Not yet triggered.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	date from which notice revoking the licence operates.			
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Not yet triggered.	N/A	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Not yet triggered.	N/A	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Not yet triggered.	N/A	
R2	Notification of environmental harm			
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not yet triggered.	N/A	
R2.2	The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Not yet triggered.	N/A	
R2.3	The licensee must provide written details of the notification to the EPA within 7 days of the date on	Not yet triggered.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	which the incident occurred.			
R3	Written report			
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Not yet triggered.	N/A	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not yet triggered.	N/A	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone	Not yet triggered.	N/A	

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
	<p>number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>			
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not yet triggered.	N/A	
7	General Conditions			
G1	Copy of licence kept at the premises or plant			
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	A copy was available during the audit.	C	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted.	N/A	
G1.3	The licence must be available for inspection by an employee or agent of the licensee working at the premises.	A copy was available during the audit and is available via the internet (EPA) or Infigen Project page.	C	
G2	Signage			

Environmental Protection Licence – EPL No.				
Condition No.	Condition	Evidence Sighted and Audit Comments	Compliance Status	Recommendations
G2.1	The location of each Monitoring and Discharge Point must be clearly marked by signs that indicate the point identification number used in this licence and be located as close as practical to the point.	The auditor did not access the Meteorological Mast locations during this audit.	N/A	
End of EPL Checklist				

Appendix B – NSW DPE approval of Auditor



Contact: Chris Schultz
Phone: 02 4224 9478
Fax: 02 4224 9470
Email: chris.schultz@planning.nsw.gov.au

Mr Tim Maddever
Contracts Manager
Bodangora Wind Farm Pty Ltd
Level 17
56 Pitt Street
Sydney NSW 2000

Dear Mr Maddever

**Bodangora Wind Farm Project (MP 10_0157)
Independent Environmental Audit**

I refer to your letter dated 3 April 2018 seeking the Secretary's endorsement for an auditor to undertake the Independent Environmental Audit (audit) under Project Approval 10_0157 as modified (the approval) for the Bodangora Wind Farm Project.

Having considered the qualifications and experience of Mr Peter Marshman of J2M Systems, the Secretary endorses his appointment to undertake the audit in accordance with Condition D8 of Schedule D of the approval. This approval is conditional on the auditor being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and the *Post-approval requirements for State significant developments – Independent Audit Guideline* dated October 2015.

The audit report is to:

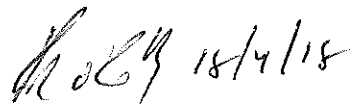
- include a compliance table indicating the compliance status of each condition of approval and any relevant Environment Protection Licence (EPL);
- not use the term "partial compliance";
- recommend actions in response to non-compliances;
- review the adequacy of plans and programs required under this approval; and
- identify opportunities for improved environmental management and performance.

Within three months of commencing the audit, or otherwise as agreed by the Secretary, Bodangora Wind Farm Pty Ltd (BWFPL) is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

Prior to submitting the audit report to the Secretary, it is recommended that BWFPL review the report to ensure it complies with the relevant approval condition.

Should you wish to discuss this matter please contact Chris Schultz on the details above.

Yours sincerely





Handwritten signature of Katrina O'Reilly in black ink, followed by the date 18/4/18.





Katrina O'Reilly
Team Leader Compliance
as nominee for the Secretary

Appendix C – Photographs from Site Inspection

Appendix C: Site Inspection Photographs

A site inspection was carried out as part of this audit with the following photos taken.

Photo No.	Photo	Description / Observation
01		General site photo from Turbine Pad 3
02		Kaiser Mine with bunting and signage.
03		General photo of condition of roads across the project.
04		<p>Evidence of water cart in use on Gillinghall Road near Goolma Road intersection.</p> <p>Evidence of completed construction of the Gillinghall / Goolma Road intersection.</p>

05		Construction of wind turbine showing pad site and access road.
06		Evidence of sediment fencing in use on site. As discussed with site team, the upper sediment fence would be better positioned on the downslope (middle left of photo).
07		Evidence of pad site construction with no erosion sediment controls installed.
08		Evidence of pad site construction with minimal erosion sediment controls installed.

09		Evidence of access track construction with minimal erosion sediment controls installed.
10		Aboriginal stone procurement artefact area (Note: Fencing installed on site, but difficult to distinguish in this photograph).
11		Storage of substances on banded pallets within main site compound.