Taralga Wind Farm

Operational Environmental Impact Audit 2016

Revision 0 – 05-Dec-2016
Prepared for – Pacific Hydro Pty Ltd – ABN: 31 057 279 508

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Client: Pacific Hydro Pty Ltd

ABN: 31 057 279 508

Prepared by

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Table of Contents

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Abbreviations

Abbreviation	Description
APZ	Asset Protection Zone
BBAMP	Bird and Bat Adaptive Management Plan
CCC	Community Consultative Committee
CARs	Corrective Action Requests
CWP Renewables	CWP Renewables Pty Ltd (ABN: 57 127 205 645)
DA	Development Application
Department	Department of Planning and Environment
Director-General	Director-General of Department of Planning and Environment or delegate
DP&E	Department of Planning and Environment
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPC	Engineering, Procurement and Construction Contractor - Vestas
EPL	Environment Protection Licence
ER	Environmental Representative
FFMP	Flora and Fauna Management Plan
GWh	Gigawatt hours
HMP	Heritage Management Plan
IDB	Vestas 360^{o} Incident Database
LRMP	Landscape and Rehabilitation Management Plan
MW	Megawatt(s)
NMP	Noise Management Plan
OEH	Office of Environment and Heritage
OEIA	Operational Environmental Impact Audit
OEMP	Operational Environmental Management Plan
OFI	Opportunity for Improvement
Pacific Hydro	Pacific Hydro Pty Ltd (ABN: 31 057 279 508)
Project	The development as described in the EA
RMS	Roads and Maritime Services
Taralga Wind Farm	The entirety of the Taralga Wind Farm, including WTG, roads, buildings and electrical infrastructure
TMP	Traffic Management Plan
TV	Television
TWF	Taralga Wind Farm
ULSC	Upper Lachlan Shire Council
VAST	Viewer Access Satellite Television - digital television to viewers in remote areas of Australia who are unable to receive digital TV through their normal TV antenna due to local interference, terrain or distance from the transmitter in their area.
Vestas	Vestas Australian Wind Technology Pty Ltd (ABN: 80 089 653 878)
VIMR	Visual Impact Mitigation Report
WMP	Waste Management Plan
WMS	Work Method Statement
WTG	Wind Turbine Generator

Executive Summary

AECOM Australia Pty Ltd (AECOM) was engaged by SPIC Pacific Hydro Pty Ltd (Pacific Hydro) to prepare an Operational Environmental Impact Audit (OEIA) of the Taralga Wind Farm located near the township of Taralga, in the southern tablelands of New South Wales (NSW) (the Site).

The OEIA was completed in accordance with Condition 23 of the NSW Department of Planning and Environment (DP&E) Development Approval (DA 241/04), dated 17 January 2006 which required that the OEIA Report must:

a. *be certified by an independent person at the Applicant's expense. The certifier must be approved by the Secretary prior to the preparation of the audit report;*

b. *compare the operation impact predictions made in the EIS and documents identified in condition 3;*

c. *assess the effectiveness of implemented mitigation measures and safeguards;*

d. *assess compliance with the systems for operation maintenance and monitoring; and*

e. *discuss the results of consultation with the local community particularly any feedback or complaints and how any such complaints were addressed and resolved.*

The audit period has been defined as from 1 September 2015 (date of formal commissioning) to 2 November 2016 (date of Site visit conducted by AECOM). This report presents the findings of this audit.

The Wind Farm has prepared an Operational Environmental Management Plan, Revision H, 22 June 2015 (OEMP) as the main tool for managing compliance with the operational requirements of the Project. The OEMP was prepared to satisfy Condition of Consent No. 26. The OEMP incorporates the mitigation and monitoring requirements identified in the Environmental Impact Statement (EIS) prepared to accompany the original Development Application and the Environmental Assessments accompanying subsequent Modification Applications as well as the Conditions of Consent.

The OEMP was prepared in consultation with the relevant Government Agencies, certified by the Environmental Representative (ER) as being in accordance with the Conditions of Consent and was approved by the Secretary of the DP&E on the 29 July 2015. A detailed review of the adequacy of the OEMP was not undertaken as part of this audit, however, Opportunities for Improvement (OFIs) identified during the process of assessing compliance with the OEMP have been highlighted.

Overall, the auditors considered that the mitigation measures implemented to have been effective in minimising the operational impacts of the Project. This finding has been made on the basis of:

- Observations made during the audit site inspection;
- The comparison of the operation impact predictions made in the EIS and subsequent Modifications;
- An assessment of the implementation of the mitigation measures outlined in the OEMP (refer **Appendix A**);
- A review of the 2015 Environmental Protection Licence (EPL) Annual Return indicating no non-compliances had been recorded;
- A review of the Vesta '360' Incident Data Base indicating no significant environmental incidents had been recorded during the audit period; and
- A review of the Complaints and Enquiries Register (1 May 2015 to 15 September 2016).

The Wind Farm was considered to be operating generally in accordance with the OEMP. A total of 84% of the OEMP requirements were identified to be compliant or not triggered.

The key observations related to:

- Rehabilitation of embankment adjacent to Wind Turbine Generator (WTG) 49 including addressing sediment and erosion control issues and establishment of vegetation cover.
- Addressing the lack of revegetation of disturbed areas along the ridgeline between WTG20 and WTG31.
- Formally recording a broader range of incidents in the Incident Data Base, for example failure of erosion / sediment control, lack of rehabilitation establishment and bird / bat strikes.
- Formalising the Corrective Action Request process to address some of the issues identified by the Monthly Environmental Inspections.
- Establishing an Emergency Management Committee and formalising an annual training exercise to assess the suitability / implementation of the Emergency Response Plan.

A summary of the compliance status of the OEMP is presented in **Table_ES 1.**

Table_ES 1 OEMP Compliance Status

Non-compliant Medium Risk	Non-compliant Low Risk	Administrative Non-compliant	Not Verified
1	6	7	5
Total number of OEMP Requirements Assessed = 132			

A number of Opportunities for Improvement have been identified and are summarised in Section 6.0

1.0 Introduction

1.1 Background

AECOM Australia Pty Ltd (AECOM) was engaged by SPIC Pacific Hydro Pty Ltd (Pacific Hydro) to prepare an Operational Environmental Impact Audit (OEIA) of the Taralga Wind Farm located near the township of Taralga, in the southern tablelands of New South Wales (NSW) (the Site).

The Operational Environmental Impact Audit was completed in accordance with Condition 23 of the NSW Department of Planning and Environment (DP&E) Development Approval (DA 241/04), dated 17 January 2006 (the Approval) and AECOM proposal to conduct the work dated 21 September 2016 (OPP-549160).

The audit period has been defined as from 1 September 2015 (date of formal commissioning) to 2 November 2016 (date of Site visit conducted by AECOM). This report presents the findings of this audit.

1.2 Audit Scope

The requirements for the Operational Environmental Impact Audit are set out in Modification 8 of DA 241/04; issued by the Secretary (Modification 8 dated September 2015), which requires the following scope of works be carried out:

Clause 23 Environmental Impact Audit Report - Operation

An Operation Environmental Impact Audit Report must be prepared and submitted to the Secretary within six (6) weeks after a 12 month period of Operation and then at any additional periods requested by the Secretary. If requested, the report must be provided to other Relevant Government Agencies.

The Operation Environmental Impact Audit Report must:

a. *be certified by an independent person at the Applicant's expense. The certifier must be approved by the Secretary prior to the preparation of the audit report;*

b. *compare the operation impact predictions made in the EIS and documents identified in condition 3;*

c. *assess the effectiveness of implemented mitigation measures and safeguards;*

d. *assess compliance with the systems for operation maintenance and monitoring; and*

e. *discuss the results of consultation with the local community particularly any feedback or complaints and how any such complaints were addressed and resolved.*

The Secretary may, having considered the findings of the Report, require the Applicant to undertake works to address the findings or recommendations presented in the Report. The result of the audit report must also be used to update the OEMP where necessary. The need or otherwise to update the OEMP must be certified by the Environmental Representative, required under condition 27. The Applicant must notify the Secretary and Relevant Government Agencies of any updates to the OEMP and provide a copy on request.

Pacific Hydro requested an extension of time for the submission of OEIA Report from DP&E. An extension was granted by DP&E on 4 October 2016 requiring the audit report to be submitted to the Department by 6 December 2016 (refer to **Appendix C**).

1.3 Audit Methodology

This OEIA was undertaken in accordance with AECOM Proposal dated 21 September 2016 (OPP-549160) to meet the scope of works described in Section 1.2.

The OEIA was carried out in general accordance with *Australia/New Zealand ISO 19011:2014 Guidelines for auditing management systems* following established audit procedures and practices

that included documentation review, interviews, a site visit and verification activities. The audit process is described in Section 3.0.

1.4 Sensitive information

It is understood that information collected during the OEIA may be sensitive. Documents used during the audit were kept secure and not distributed outside the relevant personnel involved in the audit.

1.5 Format of report

The format of this report is as follows:

- Section 1.0 is an introduction and provides the scope and nature of the audit;
- Section 2.0 briefly describes the operations at Taralga Wind Farm as observed during the Site inspection on 2 and 3 November 2016;
- Section 3.0 summarises the audit process;
- Section 4.0 provides photographs of activities and issues observed during the Site inspection;
- Section 5.0 provides a comparison with EIS predictions, discusses compliance with systems for operations, consultation with the local community and the effectiveness of implemented mitigation measures.
- Section 6.0 summarises the compliance issues identified and provides recommendations or actions to improve the environmental performance at the Taralga Wind Farm.
- Section 7 provides the limitations of the report.

Appendix A is a tabulated review of the results of the assessment against the OEMP, Revision H, 22 June 2015.

This report provides a summary of findings including details of non-compliances identified in the audit and recommended actions to improve compliance status.

2.0 Taralga Wind Farm Operations

2.1 Site Ownership and Management Overview

The following is noted concerning ownership and management of the Taralga Wind Farm:

- Taralga Wind Farm is owned by SPIC Pacific Hydro Pty Ltd and is asset managed by CWP Renewables Pty Ltd (ABN: 57 127 205 645) (CWP Renewables) in accordance with its contract and DA 241/04.
- Vestas Australian Wind Technology Pty Ltd (ABN: 80 089 653 878) (Vestas) was the Engineering, Procurement and Construction Contractor (EPC) of the Taralga Wind Farm and was managing operational aspects of the Project in conjunction with the CWP Renewables Asset Manager at the time of the Site inspection. Vestas has a five year maintenance contract for the operation and maintenance of the Taralga Wind Farm.
- Downer EDI Limited (ABN: 97 003 872 848) (Downer) was awarded the contract by Vestas for the balance of civil and electrical plant infrastructure work at Taralga Wind Farm. At the time of the Site inspection Downer were responsible for rectification works of defective plant infrastructure under Vestas contractual arrangements.

Figure 1 presents the organisational structure at the Site.

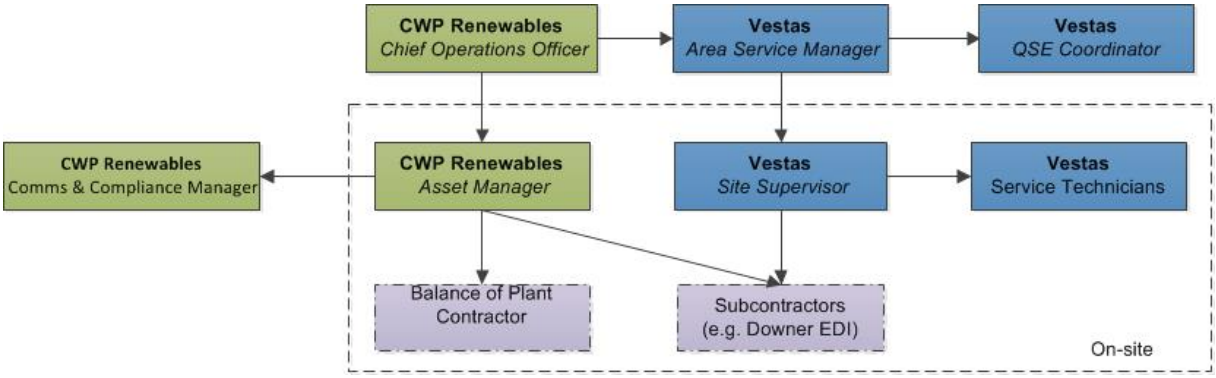

Figure 1 Taralga Wind Farm Organisational Structure

2.2 Site Description

Taralga Wind Farm is located in a rural area approximately 3 kilometres (km) east of the township Taralga, and 35 km north of Goulburn, in the Upper Lachlan Local Government Area.

The original development application proposed the development of a wind farm with 62 turbines and ancillary infrastructure. The Project was approved by the then Minister for Planning on 17 January 2006. The decision was subsequently appealed in the NSW Land and Environment Court, which upheld the decision on the 23 February 2006.

The original Development Consent has been modified eight times. **Table 1** provides a summary of the modifications to DA 241/04.

Table 1 Date of Project Approval Modifications

Reference	Date	Summary
Original Development Consent	23 February 2006	Construction and operation of wind farm with 62 turbines and ancillary infrastructure
Modification (MOD) 1	20 April 2009	Remove one turbine and increase the height of the turbines from 110m to 131.5m
MOD 2	18 June 2013	Remove 10 turbines from the development footprint
MOD 3	6 November 2013	Replace two site compounds with an alternative compound and create new access routes
MOD 4	6 November 2013	Install 13 meteorological masts
MOD 5	11 November 2014	Relocation and realignment of electricity lines and access tracks and minor changes to other surface infrastructure.
MOD 6	20 June 2014	Modify the heavy vehicle transport route through Goulburn
MOD 7	13 March 2015	Remove restrictions on works at Riparossa Road, re-alignment of an underground electricity cable, administrative changes.
MOD 8	14 September 2015	Amending the schedule of land in the consent; changing restrictions on external night lighting; revising the operational noise conditions to align with the Environmental Protection Licence (EPL); changing the offset requirements for the clearing associated with the development of Row 6 of the wind farm; clarifying the rehabilitation requirements for the hardstands constructed for the wind farm; and revising the proposed arrangements for the proposed TV re-transmitter.

2.3 Overview of Operations

The Wind Farm generates up to 106.8 Megawatts (MW) of electricity and consists of the following components:

- 51 Wind Turbine Generators (WTGs) with hub heights of 80 metres (m) above ground level. The WTG's consist of:
  - 21 x V100 1.8 MW WTGs (100 m rotor diameter);
  - 21 x V90 2.0 MW WTGs (90 m rotor diameter); and
  - 9 x V90 3.0 MW WTGs (90 m rotor diameter).
- One substation to transform the electricity produced by the Wind Farm from 33 kilovolt (kV) to 132 kV;
- A service compound located adjacent to the substation and consisting of the site office and workshop.
- Site access roads.
- WTG hardstands for WTG assembly and maintenance.
- Underground electrical and fibre optic cabling.

- 33 kV overhead power line and optical ground wire.
- Eight wind monitoring masts, each 80 m in height.
- One digital television re-transmitter.

The main activities associated with the Wind Farm operation are:

- Operation and maintenance of the 51 WTGs.
- Operation and maintenance of the substation and other associated electrical infrastructure.
- Maintenance of rehabilitated areas, drainage systems, access tracks, hardstands, fences and gates.
- Management of environmental issues.

The WTGs operate 24 hours per day, seven days per week 365 days per year, whenever sufficient wind is available for operation. At the time of the audit site inspection, the wind turbines were not operating due to an outage at the Marulan transmission line.

3.0 Audit Process

The audit was carried out in general accordance with *Australia/New Zealand ISO 19011:2014 Guidelines for auditing management systems* following established audit procedures and practices that included documentation review, interviews, a Site inspection and verification activities.

A brief description of the audit process is provided in the following sections.

3.1 Audit Program

A summary of the audit programme is provided in **Table 2**.

Table 2 Audit Programme

Start Date	End Date	Actions	Location
04/10/2016	04/10/2016	Project kick-off meeting between AECOM Project Manager and Pacific Hydro Project Manager	Via telephone, 4 October 2016
04/10/2016	31/10/2016	Draft Audit Checklist Prepared	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000
01/11/2016	02/11/2016	Site Inspection	Taralga Wind Farm, Old Showground Road, Taralga, NSW 2580
03/11/2016	23/11/2016	Draft Reporting	AECOM Offices, L21, 420 George Street, Sydney, NSW 2000
24/11/2016	2/12/2016	Draft Report Comments	Taralga Wind Farm, Old Showground Road, Taralga, NSW 2580
03/12/2016	05/12/2016	Final Report	Taralga Wind Farm, Old Showground Road, Taralga, NSW 2580

3.1.1 Pre-audit Meeting

A pre-audit project kick-off telephone call was held on the 4 October 2016 between the following:

- Helen Onus, Auditor and Project Manager, AECOM; and
- Catherine O'Riordan, Senior Environment & Development Planner, Pacific Hydro Australia.

3.1.2 Document Review

CWP provided AECOM with a number of documents prior to the audit as part of the pre-audit preparation. A number of environmental management related documents were also available on the Taralga Wind Farm website. The auditors gathered additional documents during and post the audit Site inspection including:

- Monitoring records (bird and bat, noise)
- Environmental Inspection records
- Registers (Complaints and Incidents)
- Induction and training records
- Monthly reports
- Correspondence with regulators

Documents used as part of the audit are referenced within this Report and in the audit checklist presented in **Appendix A.**

3.1.3 Audit Checklist

An audit checklist was prepared prior to the site inspection, based on the requirements of the OEMP (Refer to **Appendix A**).

3.1.4 Site Inspection

A two day Site inspection was conducted on 1 and 2 November 2016. The Audit Team consisted of the personnel listed in **Table 3**.

Table 3 Audit Team

Name	Position	Organisation
Nick Ballard	Lead Auditor	AECOM
Helen Onus	Auditor	AECOM

Nick Ballard and Helen Onus were approved by the DP&E as suitably experienced and qualified to undertake the independent audit as required by Clause 23 (a) of the Project Approval letter dated 4 October 2016. Nick Ballard is registered by Exemplar Global as a Certified Lead Auditor for Environmental Management, Site Contamination Assessment and Compliance Auditing. Helen Onus is registered by Exemplar Global as a Certified Auditor for Environmental Management.

The names of personnel interviewed during the audit are provided in **Table 4**.

Table 4 Name and Position of Personnel Interviewed During Site Inspection

Name	Position	Company	Remarks
Derek Dymond	Asset Manager	CWP Renewables Pty Ltd	Attendance at opening and closing meetings. Accompanied auditors on-site inspection. Participated in interviews.
Shannon Conray	Site Supervisor	Vestas Australian Wind Technology Pty Ltd	Participated in interviews.
Shaun Harrison	Area Service Manager	Vestas Australian Wind Technology Pty Ltd	Participated in interviews.
Narelle	QSE Coordinator	Vestas Australian Wind Technology Pty Ltd	Participated in interviews.

For each checklist question and/or requirement audited during the audit process, AECOM:

- Conducted interviews with selected Site personnel;
- Evaluated the data, reports and other evidence to substantiate whether the question had been answered;
- Identified any data gaps, inconsistencies, errors and uncertainties;
- Assessed the reliability and quality of information provided;
- Assessed environmental management performance; and
- Completed a summary of findings and recommendations.

Photographs taken during the Site inspection are provided in Section 4.0.

3.1.4.1 Opening and Closing Meetings

In accordance with *ISO 19011:2014 Guidelines for auditing management systems* an opening and closing meeting was held during the Site inspection. Details of attendees at both meetings are provided in **Table 4,** records of the meetings are provided in **Appendix B**.

3.1.5 Audit Verification Activities

The auditors undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and a site inspection. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information, such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site (e.g. review of management plans). The site inspection concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspection and interviews of one day.

4.0 Site Inspection Observations

This section provides a brief overview of key observations made during the Site inspection on 1 and 2 November 2016. The auditors were escorted around by the Asset Manager who made himself available for this purpose.

Table 5 Site Inspection Photographs

Photo #	Comment	Photo
Soil and Water Management Plan		
4-1.	A surface water channel on the ridge line (between WTG20 and WTG31) showing limited seeding success. Refer to **2016-OFI-009** (Audit Ref #041)	
4-2.	A disturbed area of land adjacent to the ridge line access road (between WTG20 and WTG31) showing limited seeding success. Refer to **2016-OFI-009** (Audit Ref #041)	

Photo #	Comment	Photo
4-3.	A disturbed area of land beneath WTG30 on the ridge line showing limited seeding success. Refer to **2016-OFI-009** (Audit Ref #041)	
4-4.	Evidence of established seeding adjacent to the access road on the lower section of the Site.	
4-5.	Evidence of established grass in a surface water drain in the lower section of the Site.	

Photo #	Comment	Photo
4-6.	Rock check dams in a surface water channel adjacent to an access road. Refer to **2016-OFI-12(a)** (Audit Ref #049)	
4-7.	Isolated areas of disturbed land were observed adjacent to the access roads. These areas had been identified in the monthly Environmental Inspections. It is noted that some areas had been impacted by livestock reducing the potential for seeding success.	
4-8.	Weeds were observed on land where a landowner had requested the area not be sprayed due to a nearby crop. Refer to **2016-OFI-10** (Audit Ref #042).	

Photo #	Comment	Photo
4-9.	Weeds were observed on land where a landowner had requested the area not be sprayed due to a nearby crop. Refer to **2016-OFI-10** (Audit Ref #042).	
4-10.	At the time of the Site inspection rehabilitation to the WTG49 embankment was not established and the area was not fenced off to protect against livestock. Evidence of livestock hoof marks was observed on the embankment during the Site inspection. Refer to **2016-OFI-11** (Audit Ref #043).	 

Photo #	Comment	Photo
4-11.	Evidence of erosion on the run-off area adjacent to WTG49. Refer to **2016-OFI-12(b)**, **2016-OFI-12(c)** and **2016-OFI-12(d),** (Audit Ref #049).	
4-12.	Evidence of erosion on the run-off area adjacent to WTG49. Refer to **2016-OFI-12(b)**, **2016-OFI-12(c)** and **2016-OFI-12(d),** (Audit Ref #049).	
4-13.	Evidence of erosion in the surface water drains/culverts adjacent to the WTG49 access road. Refer to **2016-OFI-12(b)**, **2016-OFI-12(c)** and **2016-OFI-12(d),** (Audit Ref #049).	

Photo #	Comment	Photo
4-14.	Evidence of erosion in the surface water drains/culverts adjacent to the WTG49 access road. Refer to **2016-OFI-12(b)**, **2016-OFI-12(c)** and **2016-OFI-12(d),** (Audit Ref #049).	
4-15.	Emergency information was observed to be available in canisters at each Site entrance. The auditors observed canisters at EP2, EP3, EP4 and EP5. Maximum quantities of hazardous substances and dangerous goods omitted from canister information. Refer to **2016-OFI-13** (Audit Ref #055).	
4-16.	The Auditors observed a leaking 200 L drum at the time of the Site inspection. Site management reported that the leak had been noticed a few weeks prior to the Site inspection and that secondary containment equipment had been purchased; however, the leak had not been cleaned-up or recorded in the Incident Register. The leaking drum was moved to one of the bunded chemical storage containers during the Site inspection and sand was placed over the impacted gravel.	

Photo #	Comment	Photo
	Refer to **2016-OFI-14(a)** and **2016-OFI-14(b)** (Audit Ref #056).	
4-17.	Access to Landholders properties was via manually operated gates. Site management reported that there are plans to install cattle grids and automated gates to facilitate the ease of passage for Site personnel and to manage potential health and safety issues in strong winds.	
4-18.	Two hazardous materials cabinets were observed in the Workshop.	

Photo #	Comment	Photo
4-19.	A spill kit was observed in the Workshop. Spill kits for service vehicles had been ordered and arrived on day of Site inspection.	
4-20.	Two dangerous goods containers with in-built secondary containment were located in the Service Compound.	

5.0 Clause 23 Environmental Impact Audit Report (Operation) Requirements

5.1 Comparison of EIS Predictions

The original Environmental Impact Statement (EIS) and additional Environmental Assessments supporting the approved Modifications to the Project Approval made a number of predictions relating to the operational impact of the Project. A summary of the key predictions made relating to the operational phase of the project and an assessment from this audit against these predictions is presented in **Table 6**.

Table 6 Comparison of Key EIS Predictions relating to operations.

Key EIS Prediction	Audit Assessment
Visual Impact - The windfarm would not obscure any landscape features - The EIS contains a map of the zone of visual influence of the development (figure 5.3 of the EIS)	The Project was modified and proposed turbines removed to achieve an acceptable visual impact. The Conditions of Consent included requirements for Visual Impact Mitigation Reports (VIMR) to be offered to residences within 2 km of a turbine. The implementation of the requirements relating to VIMRs is provided in **Appendix A**, Audit Reference # 069-073.
Landuse - The windfarm would help maintain existing commercial agriculture and protect rural land from inappropriate fragmentation in the long term. - Agricultural land would not be impacted in a manner that compromises its efficient and effective agricultural production potential.	A review of the Complaints and Enquiries Register (1 May 2015 to 15 September 2016) did not identify any landowner complaints concerning the agricultural production potential of their land.
Noise - The predicted noise levels at all residences are within the noise limits at all considered wind speeds. The impacts would not be unacceptable. - The windfarm is not predicted to have an amenity or health effect due to low frequency noise, vibration or infrasound.	A Noise Compliance Report (Sonus, November 2015, Ref: S2570C61) and an Addendum Environmental Noise Compliance Report (Sonus, January 2016, Ref: S2570C67) were prepared as required by the Conditions of Consent to assess the noise performance of the project against the specified noise limits. The results of the noise compliance testing (Sonus, 2015 and 2016) did not indicate any exceedances of the operational noise criteria (refer also **Appendix A**, Audit Reference #112 – 114). Two complaints were received relating to noise. These are discussed in **Appendix A**, Audit Reference # 115.
Heritage The windfarm would not impact on any listed sites or places of non-indigenous heritage value.	Heritage sites were identified on the site plans and access prevented during construction through use of on-site controls. Site management reported there had been no impacts to any listed heritage sites or places during operations.
Water Quality The operation of the windfarm would have a neutral effect on water quality and no off site impacts are likely to occur.	Off-site impacts to water quality were not observed or reported to have occurred by Site management during the Site inspection. Some localised erosion associated with rehabilitation activities was observed as discussed in **Appendix A**, Audit Reference #049.

Key EIS Prediction	Audit Assessment
Flora and Fauna Habitat loss or disturbance would not be significant. Assessments of potential impacts on bird and bat species that do and could utilise the site conclude the impacts are not likely to be significant	The Bird and Bat Adaptive Management Plan (BBAMP) was being implemented at the time of the Site inspection. Refer to **Appendix A**, Audit Requirement # 101-111.
Traffic and Transport On an operational basis the windfarm would not generate significant traffic volumes	Traffic volumes were reported to be similar to those outlined in the OEMP. Refer **Appendix A**, Audit Requirement # 077.
Greenhouse Gas and Energy The windfarm would have a total installed capacity of 103.5-138MW and an annual energy output of 271,998MWh to 362,664MWh	This was changed by later Modifications as the number of turbines was reduced from 69 to 51. The installed capacity was 106.8 MW (9 X 3 MWh, 21 X 2 MWh and 21 X 1.8 MWh The average annual energy generation was reported as 283 GWh.
Socio-economic The windfarm would not diminish tourism opportunities. The windfarm would also provide credible commercial opportunities for tourism benefits.	There was no evidence available for review to indicate that the Wind Farm had diminished tourism opportunities. The Wind Farm held a community open day in mid-2015 which was attended by approximately 250 people.
Communication Services TV reception around Taralga would not be impaired, but improved as a direct result of the windfarm (due to installation of new TV-re-transmitter). Impacts on other communication infrastructure have been avoided through the careful layout of turbines. There would be no adverse effect on microwave communications, UHF links or radio reception.	The new TV re-transmitter was commissioned in November 2015. Prior to its installation residences within the predicted interference zone were eligible for the installation of the free-to-air satellite service known as VAST (Viewer Access Satellite Television). Refer also to **Appendix A**, Audit Reference # 098. Four complaints were received directly post commissioning of the TV re-transmitter which were related to a circuit breaker trip. A further 10 were received post commissioning which upon investigation were found to be unrelated to Wind Farm operations (five related to a weak signal at the Wollongong transmitter and five were as a result of a local blackout). It was reported there had been no impacts to other communication infrastructure during the audit period.
Hazards and Risks There are no significant risks (including air safety, bushfire risk, public, employee and electrical safety) associated with the windfarm.	An Emergency Response Plan had been prepared and was generally being implemented at the Site (Refer **Appendix A**, Audit Reference # 125-132).
Air Quality From an operational perspective, both at a local and global level, the windfarm would provide a net environmental improvement to air quality.	There were no adverse air quality impacts observed or reported by Site management during the Site inspection as a result of the Wind Farm operations. The windfarm has an average annual generation 283 GWh. If this energy was to replace fossil-fuel sourced energy then there would be a net environmental improvement to air quality at a global level.

The mitigation measures proposed in the EIS, as modified, relating to the operational phase of the project were included in the OEMP and an assessment of the implementation of those measures is presented in **Appendix A**.

5.2 Compliance with Systems for Operations Maintenance and Monitoring

Systems for operations maintenance and monitoring are outlined within the OEMP. The OEMP was prepared as required by Condition of Consent No. 26 to incorporate the mitigation and monitoring requirements identified in the Environmental Impact Statement (EIS) prepared to accompany the original Development Application and the Environmental Assessments accompanying the Modification Applications as well as the Conditions of Consent.

The OEMP was prepared in consultation with the relevant Government Agencies, certified by the Environmental Representative (ER) as being in accordance with the conditions of consent and was approved by the Secretary of the DP&E on the 29 July 2015.

This audit assessed compliance with the commitments and requirements outlined in the OEMP. Findings of the assessment of compliance with systems for operations maintenance and monitoring are presented in **Appendix A**. A summary of the non-compliances and recommendations is presented in Section 6.0.

A detailed review of the adequacy of the OEMP was not undertaken as part of this audit, however any Opportunities for Improvement (OFIs) identified during the process of assessing compliance with the OEMP have been noted and are summarised in Section 6.0.

5.3 Consultation with Local Community

This Section addresses the requirement to discuss the results of the consultation with the local community particularly feedback or complaints and how they were addressed and results.

This was achieved by reviewing the meeting minutes of the Community Consultative Committee (CCC) meetings and the Complaints and Enquiries Register as well as interviews with the Asset Manager.

5.3.1 Community Consultative Committee

The CCC was established and held its first meeting in January 2014. Initially the CCC was meeting monthly during the construction phase of the project. This was reduced to quarterly during operations as committed to in the OEMP.

The CCC comprised the TWF Asset Manager, six local residents, a member from the Australian Wind Alliance and an independent Chair-person. A representative from the Office of Environment and Heritage (OEH) is also invited to the meetings.

During the audit period (September 2015 to November 2016) the CCC met twice, in October 2015 and in February 2016. At the February 2016 CCC meeting it was moved that the number of meetings be reduced to annually. This was decision was passed unanimously by those present at the February 2016 meeting. The next meeting is scheduled for February 2017.

The auditors reviewed the September 2015 and February 2016 meeting minutes. The main points of discussion at these meetings was the TV re-transmitter, community enhancement program, rehabilitation of the construction site, resurfacing of Taralga Road and noise compliance report.

5.3.2 Complaint management

The Wind Farm maintains an 1800 Feedback and Enquires telephone number which it advertises on its website. In addition the public can contact the Site via email or post. The process of responding to complaints and enquiries was discussed with the Asset Manager during the audit. It was explained that the incoming call on the 1800 number diverts to a third party message centre. An email is then sent by the message centre to a list of nominated Wind Farm personnel with the date and time, the complainant / enquirer's name and phone number. The Asset Manager, or delegate, then responds to

the complaint / enquiry and documents the findings as well as a summary of the issue in the Complaints and Enquiries Register.

The auditors reviewed the Complaints and Enquiries Register (1 May 2015 to 15 September 2016). A summary of the number of complaints and enquiries received during the audit period is period is presented in **Table 7**.

Table 7 Summary of Complaints and Enquires Received during the audit period

	Operations (1 September 2015 to 15 September 2016)	
	Enquiries	Complaints
	55	14
Total	**69**	

The majority of enquiries related to requests for information, callers offering products or services or general enquiries. The auditors considered these were appropriately categorised as an enquiry.

The 14 complaints received during the operational phase all related to TV reception issues. Four complaints were received directly post commissioning of the TV re-transmitter which were related to a circuit breaker trip. Five related to a weak signal at the Wollongong transmitter (unrelated to Wind Farm operations) and five were as a result of a local blackout. A review of the Complaints and Enquiries Register indicated they were adequately investigated and closed out.

For some of the complaints received prior to the audit period, the Complaints and Enquiries Register documents the response as "*email forwarded to CWP for action*". Later complaints included more detail as to the actual response taken; however, the auditors consider that there is still room for improvement to include further details of the response provided to the complainant and to document whether the complainant was satisfied with the response (Refer to **2016-OFI 06**).

5.4 Effectiveness of implemented mitigation measures

The auditors consider that the mitigation measures implemented have generally been effective in minimising the operational impacts of the Project. This finding has been made on the basis of:

- Observations made during the audit Site inspection;
- The comparison of the operation impact predictions made in the EIS and subsequent Modifications;
- An assessment of the implementation of the mitigation measures outlined in the OEMP;
- A review of the 2015 EPL Annual Return indicating no non-compliances had been recorded;
- A review of the Incident Data Base indicating no significant environmental incidents had been recorded; and
- A review of the Complaints and Enquiries Register (1 May 2015 to 15 September 2016).

A number of Opportunities for Improvement have been identified and are summarised in Section 6.0

6.0 Summary of Non-compliances and Recommendations

The status of the Wind Farm's performance during the audit, in respect to Clause 23 of DA 241/04, Modification 8 issued by the Secretary in September 2015 is presented in **Appendix A**. Requirements considered to be not complied with, or not able to be verified, have been listed in Section 6 of this report.

Table 8 provides a summary of the performance categories in respect the compliance status for each requirement or commitment as defined in the *Post Approval Requirements for State Significant Developments, Independent Audit Guideline* (NSW Government, October 2015, p7).

Table 8 Performance Category Assessment Criteria

Performance Category	Definition
Compliant	Currently in compliance. Sufficient verifiable evidence was available to demonstrate that the intent and all elements of the requirement of the regulatory instrument had been complied with within the scope of the audit.
Non-compliant	Currently not in compliance. Sufficient verifiable evidence was available to demonstrate that the intent of one or more specific elements of the regulatory instrument have not been complied with within the scope of the audit.
Administrative Non-compliance	A technical non-compliance with a condition of the consent that would not impact on performance and that is considered minor in nature (e.g. report submitted but not on the due date, failed monitor or late monitoring session). This would not apply to performance related aspects (e.g. exceedance of a noise limit) or where a condition had not been met at all (e.g. noise management plan not prepared and submitted for approval).
Not Verified	It has not been possible to determine whether compliance exists. Sufficient verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory instrument have been complied with within the scope of the audit was not available.
Not Triggered	Condition not applicable at time of audit or had not been triggered
Observation	The identified issue(s) of concern do not strictly relate to the scope of the audit or assessment of compliance. Further observations are considered to be indicators of potential non-compliances or areas where performance may be improved.
Noted	A statement or fact, where no assessment of compliance is required.

Table 9 provides a summary of the risk levels for non-compliances as defined in the *Post Approval Requirements for State Significant Developments, Independent Audit Guideline* (NSW Government, October 2015, p8).

Table 9 Risk Levels for Non-compliances

Risk Level	Definition
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences, but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences, but is likely to occur.
Administrative Non-compliance	Applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

Auditor's comments are provided next to each requirement to explain evidence sighted relevant to each requirement. Where considered relevant, observations have been made regarding specific compliance issues.

Requirements considered Non-compliant are presented in **Table 10** of this report. The table includes a discussion of the compliance status and recommendations for improvement where appropriate.

Where requirements were considered compliant but it was considered a continuous improvement opportunity existed, an OFI has been made. A summary of these recommendations is provided in **Table 11** of this report.

Table 10 Requirements assessed as Non-Compliant and Not Verified

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
011	4.1	Information Management TWF maintains a hosted document management system specifically tailored as a central repository of all Wind Farm information including that associated with this OEMP.	The Wind Farm has a dedicated 'Wiki' page which acts as a depository for Project information. It was noted that some information was stored on the Wiki, some information was stored as hard copies and some information was stored on standalone hard drives due to local internet connectivity issues impacting upload to the Wiki. Given the potential for key documents to misplaced or lost due to the three separate document control systems in use at the time of the Site inspection, this requirement was found to be an administrative non-compliance.	**Administrative Non-compliance**	**2016-OFI-02** Critical site management documents should be stored and maintained in the official hosted document management system.
015	4.2	Environmental Reporting The table below lists the reports associated with the OEMP that will be prepared and submitted to regulatory authorities in accordance with the Conditions of Consent and EPL. Due dates for each report are noted in the *Project Calendar.* Subject to confidentiality, the reports will be made publically available on the Wind Farm website following approval by the DP&E or issuing to the relevant government agency, as per Condition 9.	The following is noted: - The *Noise Compliance Report* was available on website - The *Operation Environmental Impact Audit Report*: This report, pending upload. - The *Road Safety Report* had not been completed at the time of the Site inspection (refer to #088) - The *Visual Impact Mitigation Reports* contain confidential information and are therefore not publicly available - The *EPL Annual Return* was not available on website at the time of the Site inspection.	**Administrative Non-compliance**	**2016-OFI-03** The EPL Annual Return should be made available on the Wind Farm website.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
019	4.5	Risk Management A *Risk Management Assessment Procedure* is maintained at the Wind Farm. Risks associated with Wind Farm operation are reviewed annually or as required based on events or legislative changes.	It was reported that legislative changes were managed through the CWP Newcastle office and that Site would be notified of any changes. The Risk Management Assessment Procedure was not available for review and on this basis this requirement has been assessed as not verified. Risks related to environmental issues are detailed in the sub plans of the OEMP and are reportedly reviewed as part of the OEMP review process. The OEMP has yet to be reviewed (refer #038). A separate site wide risk assessment is not routinely conducted. Instead risk assessments are undertaken on a task basis through Job Safety Environmental Analysis (JSEAs).	Not verified	**2016-OFI-04** Maintain a Risk Management Procedure.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
023	4.7	<u>Environmental Incidents</u> An environmental Incident can include: • Spill of fuel, oil chemical or other hazardous materials • Failure of erosion / sediment control • Contamination of surface water, groundwater or land • Breach of licence, permit condition or legislative requirements • Damage to vegetation marked for protection • Discovery or damage to cultural heritage materials or sites • A complaint arising from an environmental issue such as noise The Incident Reporting Protocol is to be followed in the event of an environmental incident. The protocol is accessible to all Site Staff on the TWF document management system and summarised in the OEMP	Incidents were reported using the Vestas Incident Management System, 360 Incident database (IDB). IDB and the process of logging incidents was demonstrated during the Site inspection. Six incidents had been logged under the category "environmental accident". These included collisions with livestock or kangaroos, pest control and a grass fire within 3 kilometres of the Site. None of the incidents related to pollution events. It was noted that some environmental incidents were not being recorded in the IDB. For example, failure of erosion and sediment control (refer # 049), failure of rehabilitation to establish and bird / bat strikes (refer #104). These were being recorded as issues in the Environmental Inspection Issues Register or in the case of bird/bat strikes a separate incident form completed for OEH. It is considered that these should be logged as environmental incidents within IDB to ensure incidents are reflected and to facilitate formal close out of actions (in particular where sub-contractors are responsible for completing remedial works). The auditors considered the current practice of logging complaints in the Complaints and Enquiries Register appropriate rather than as incidents. There had been no environmental incidents causing or threatening material harm to the environment and therefore the external reporting requirements of the Incident Reporting Protocol had not been triggered.	**Administrative Non-Compliance**	**2016-OFI-05** Expand the current practice of logging incidents to include environmental incidents identified in the OEMP (such as failure of erosion / sediment control, failure of re-seeding to establish, bird / bat strikes).

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
041	5.4	<u>Seeding of Disturbed Areas *^</u> Disturbed areas between T20 and T27 are to be re-seeded with native Wallaby Grass (5 kg/ha) and Sterile Ryecorn (20 kg/ha). All other disturbed areas will be re-seeded with a mix that includes Australian Phalaris, Tekapo cocksfoot, Lakota prairie grass, Goulburn sub clover, Leura sub clover and Ryecorn (25 kg/ha as a seed mix). Diammonium phosphate (DAP) fertiliser is to be applied at 100 kg/ha if broadcast or 200 kg/ha if hydroseeded. **Frequency:** As required, until rehabilitation has satisfactorily stabilised	Site management reported that ridge line WTG's, including the areas between WTG20 and WTG27 were seeded with native Wallaby Grass; however; seeding in this area had not established as expected (refer to photographs 4-1 to 4-3). During the Site inspection it was observed that small loose rocks in this area were providing cover helping to protect and minimise soil erosion; however, while evidence of seedlings were sighted, coverage was sporadic. It was noted that topsoil was limited in the tree line of the ridge and that leaf litter appeared to be the main groundcover material. Disturbed areas had been seeded by Downer EDI progressively as construction works were completed during period 2014 to 2015. Site management reported that re-seeding was completed in October 2015. Evidence of established seeding adjacent to access roads, around the bases of the WTG and in surface water channels was observed off the ridge line (i.e. WTG20 to WTG31). During the Site inspection it was observed that rehabilitation had also not fully established between WTG28 and WTG31 on the ridge line. Evidence of scouring was observed in the surface water channels adjacent to the access road. Site management reported that the responsibility for re-seeding disturbed areas on the ridge line would be with Vestas (the EPC) and their contractor (EDI Downer). The auditors consider there is a potential risk that disturbed areas on the ridge line may be re-seeded without due consideration as to the root cause of the lack of re-growth (e.g. structural / soil / water retention etc.) and that specialist advice should be considered prior to any re-seeding in this area. Given the disturbed areas between WTG20 and WTG27 require further work until a satisfactory level of rehabilitation is achieved this requirement is considered to be ongoing and was found to be not verified.	Not verified	**2016-OFI-09** Consider engaging a specialist rehabilitation consultant to review the re-seeding options for the ridge line (i.e. between WTG20 and WTG31). Implement any recommendations provided by the specialist and monitor and manage the progress of re-seeding on the ridge line on a regular basis until the vegetation is self-sustaining and meets the requirements of the landowner.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
043	5.4	<u>Fencing off of Rehabilitation Areas *^</u> On-site high erosion hazards areas will be fenced off from livestock. These areas will include the: • eastern end of the T58 hardstand; and • northern side of the T49 hardstand. Other areas may be identified as construction is completed. High risk areas are shown in Drawings EV05 to EV07 in Appendix F. **Frequency:** As required. **Management doc**: Environmental Site Inspection	Site management reported that the location of WTG49 had to be moved due to an identified heritage zone. This resulted in a steeper embankment to the north of the work pad that required seeding. At the time of the Site inspection rehabilitation to the WTG49 embankment was not established and the area was not fenced off to protect against livestock. Evidence of livestock hoof marks was observed on the embankment during the Site inspection. The Environmental Inspection Issue Register included references to "*poor rehab*" and "*It appears that grass seed washed away from steeper areas leading to erosion and sediment build up*". The Register notes that the Asset Manager had notified Vestas, EDI Downer to the issues. Revegetation at WTG58 was considered to be satisfactory at the time of the Site inspection and no fencing was required. The following Environmental Inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. Site management reported that there were no other areas on-site that required fencing to protect against livestock and none were observed by the auditors. On the basis that the high erosion hazard area at WTG49 had not been fenced off, this requirement has been assessed as non-compliant. The potential for environmental consequences was considered low due to the low sensitivity of the receiving environment for sediment (cattle paddock with no surface water drains in the vicinity).	**Non-compliant** **Low Risk**	**2016-OFI-11** The embankment to the north of WTG49 should be re-seeded and fenced to protect against livestock. Monitor and manage the progress of re-seeding on a regular basis until the vegetation is self-sustaining and it meets the requirements of the landowner.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
049	5.4	<u>Maintenance of Erosion and Sediment Control</u> Inspection of erosion and sediment control measures on a monthly basis and after significant rainfall (more than 15mm in one hour or more than 30mm over 24 hours). Repairs to be undertaken as required, including cleaning out of barriers and removal of sediment. Repairs may also include barrier replacement, or additional measures where soil disturbance has occurred due to maintenance activities or erosion risk is identified. Design drawings of barriers to be used are provided in Appendix F. Rock check banks (Drawing SD5-4) were found to be most effective barrier during construction while straw bales (Drawing SD6-7) were also used for short term measures if not located in stocked paddocks. The maximum spacing of barriers is given in Drawings EV05 to EV07 in Appendix F. Sediment basins at the Service Compound and at significant drainage line crossings will be maintained for the life of the Wind Farm. Other temporary sediment basins (at crane hardstands and access tracks) and erosion control barriers will be removed only after rehabilitation works have been completed on more than 90% of the contributing catchment.	The following Environmental Inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. The Environmental Inspection Issue Register was noted to include erosion and sediment issues for specific locations across the Site. The Register noted that the responsibility of the identified erosion issues was with EPC and their contractor. The Asset Manager was responsible for the management of rock check dams and culverts. Monthly Environmental Inspections note if an inspection was conducted after a rain event. Sighted an inspection form dated 14 July 2016 following a rain event. Site management reported that they had commissioned Divall's Earthmoving and Bulk Haulage Pty Ltd to clean out the surface water drain at the Ainsworth Crossing and replace rock where necessary. The sediment basin and associated drains were observed at the compound during the Site inspection. Site management reported that some landholders had requested that sediment basins used during construction activities remain so that they could be used for watering their livestock. Grass was observed to be established in sediment in some surface water drains on the lower section of the Site. Site management reported that the decision had been made to leave the grassed sediment in place rather than remove it and expose bare soil which may lead to future sediment issues. The auditors concur with Site management's process to leave established grass in surface water channels where sediment may have accumulated; however, the source of the sediment should be determined, adequacy of remaining capacity assessed and measures taken to prevent further accumulation.	**Non-compliant** **Medium Risk**	**2016-OFI-12a** The source of sediment in drainage channels within the lower section of the site should be investigated and measures taken to prevent further accumulation. Consideration should be given to increasing the water-holding capacity of rock check dams where grassed sediment has accumulated. **2016-OFI-12b** The layout, design and spacing of interception structures of the surface water drains/culverts around WTG49 should be assessed to ensure it complies with the Landcom, 2004 publication, *Managing Urban Stormwater: Soils and Construction* (Blue Book). **2016-OFI-12c** Vegetation cover should be established on the sill surface water runoff area on the landholders land adjacent to WTG49 and the area should be fenced to exclude livestock if grazing or tracking is likely to impact re-vegetation.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
049	5.4	In the event of the failure of erosion/sediment control the Incident Reporting Protocol must be followed. A report of the incident will be documented showing date, nature of incident action taken (photographs if possible) with details entered into the Incident Register. **Frequency:** Monitoring monthly and maintenance as required **Management Doc:** Environmental Site Inspection	WTG49 Scouring of the surface water channels/culverts was observed adjacent to the access road above WTG49 (see photographs 4-11 to 4-14). Erosion was also observed to the surface water run off area on landholders land adjacent to WTG49. Site management reported that the landowner was aware of the erosion issues on the land and that remediation works for the drainage channels and surface water runoff area was the responsibility of the EPC and their subcontractor given it was a likely design issue and was within the contracted warranty period for the Wind Farm. The erosion issues at WTG49 had been included in the CWP Environmental Inspection Issue Register but not been entered as an incident into Vestas IDB. The Vesta IDB System is a more formal incident management system that allows for corrective action tacking and escalation.		**2016-OFI-12d** The erosion of surface water drains/culverts and the surface water runoff area at WTG49 should be logged as an incident in the Vestas IDB system and formally tracked until the issue has been closed.
055	5.4	Identification of Hazardous Materials Maintenance of a Hazardous Substances and Dangerous Goods Yellow Folder in the Service Compound which includes: • Material Safety Data Sheets (MSDS) for all chemical substances brought onto Site; • Site Map showing the location of hazardous materials; • Allowable storage quantities; and • A list of Personnel approved to access the hazardous materials. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; MSDS	Safety Data Sheets (SDS) were observed to be stored in a folder in the Site Office. Emergency information capsules located at each entrance to the Site as well as the Site Compound were observed to include maps showing the location of hazardous materials but not maximum quantities. A list of personnel approved to access the hazardous materials was not available. Two hazardous materials cabinets in the Workshop as well as the two dangerous goods containers in the Service Compound displayed the maximum storage quantities.	**Administrative Non-compliance**	**2016-OFI-13** The maximum allowable storage quantities for Hazardous Substances and Dangerous Goods as well as a list of personnel approved to access the hazardous materials should be included in the SDS folder and emergency capsules.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
056	5.4	<u>Storage of Hazardous Materials</u> All hazardous materials will be stored in Australian Standard storage containers according to AS 1940-2004 and in accordance with Storing and Handling liquids: Environment Protection, Participants Manual: Appendix: Technical Considerations (DECC, 2007). Wastes may accumulate in small quantities at the point of generation. Wastes are typically accumulated in 200 L (55-gallon) drums or purpose designed waste containers that are stored within a secondary containment. As waste containers are filled, they will be moved to designated hazardous waste storage areas. The chemical and hazardous waste storage areas are inspected every six months to prevent releases, explosions, and fires. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; Materials Safety Data Sheets (MSDS)	Two hazardous materials cabinets were located in the Workshop. The cabinets each displayed a maximum capacity of 250 Litres (L). Two dangerous goods containers with built in secondary containment were located in the Service Compound and displayed a maximum storage capacity of 1,500 L each (supplied by Tradecorp International Pty Ltd). Signage on the containers indicated that they complied with the requirements of AS 1940-2004. An assessment against the requirements of AS 1940-2004 was not included in the scope of works for the audit and was not conducted by the auditors. A double skinned above ground waste oil storage tank with a capacity of 4,000 L was located in the Service Compound. The back-up generator located in the Service Compound was reported to have a double skinned diesel storage tank (unknown capacity). The generator was not accessed during the Site inspection due to health and safety requirements. Twelve 200 Litre (L) steel drums were observed to be stored adjacent to the Workshop. Site management reported the drums are used to store oily rags, empty grease containers and other waste hydrocarbon material related to maintenance activities on the WTGs (i.e. on-site away from the Site Compound). The drums were stored on the gravel hard stand of the Site Compound without secondary containment (i.e. bunded pallet). The auditors observed a leaking 200 L drum at the time of the Site inspection. Site management reported that the leak had been noticed a few weeks prior to the Site inspection and that secondary containment equipment had been purchased; however, the leak had not been cleaned-up or recorded in the Incident Register. Site management reported that the leak occurred as the internal plastic bag had not been fully sealed. The leaking drum was moved to one of the bunded chemical storage containers during the Site inspection and sand was placed over the impacted gravel.	**Non-compliant** **Low Risk**	**2016-OFI-14a** Drums containing controlled wastes (i.e. oily rags) should be stored with secondary containment in a dedicated storage area. **2016-OFI-14b** Ensure that the plastic bags that are placed into the 200 L steel drums to store hazardous materials are fully sealed before sealing the drum.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
056	5.4		It is noted that "*Spills of Hazardous Materials*" and *"Managing Hydrocarbons & Chemicals*" are included in the environmental induction. The environmental induction states *"For any incident, spill or unexpected find that occurs onsite, the following applies:* 1. *Immediate action/contain* 2. *Report* 3. *Investigate* 4. *Remedial works* 5. *Close out* " Given a 200 L drum containing oil rags was observed to be leaking at the time of the Site inspection this requirement was found to be non-compliant.		

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
059	5.4	<u>Spills of Hazardous Materials</u> For major spills or releases of hazardous substances, the procedures in Appendix M – ERP must be followed. In addition: • The spill is to be contained using sandbags or earth bunds if safe to do so; • If the spilled material is a flammable liquid such as petrol the area should be covered with foam from a fire extinguisher to minimise risk of ignition; • For minor spills less than 5 litres: - the hazardous material will be cleaned up immediately using bio-absorbent material or other appropriate method; and - Waste type spill material is to be collected for disposal at an appropriate registered waste container or disposal site with details recorded; For both major and minor spills the Incident Reporting Protocol must be followed. A report of the incident will be documented showing date, nature of incident action taken (photographs if possible) with details entered into the Incident Register. **Frequency:** As required **Management Doc:** Incident Register	Site management reported that there had not been any major spills during the audit period. The Incident Register was reviewed during the Site inspection and did not include reference to a major spill or release during the audit period. The auditors observed a leaking 200 L drum at the time of the Site inspection. Refer above to item #056 for details. The leak from the oil drum observed during the Site inspection was considered to be a minor spill (i.e. less than 5 L). Given a spill/leak had occurred and had not been addressed in accordance with the requirement for a spill of less than 5 L this requirement was found to be non-compliant.	**Non-compliant** **Low Risk**	**2016-OFI-15** Refresher training for the management of leaks and/or spills should be conducted to reinforce the requirements of the Site's Incident Management System. Refer to **2016-OFI-14a** and **2016-OFI-14b**

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
070	7.4	<u>Commission a Qualified Landscape Professional to Prepare A VIMR</u> For eligible landscaping applications, a qualified landscape professional will be commissioned (and his/her appointment approved by the Secretary) to investigate reasonable and feasible measures to minimise the visual impacts of the development on the landowner's property using landscape measures. These measures are to be summarised in a Visual Impact Mitigation Report (VIMR) for that property. **Frequency:** Commissioned within 14 days of an eligible request	The appointment by the Secretary of a qualified landscape professional could not be demonstrated. Individual Landscape Plans indicated that they had been prepared by Fresh Landscape Design Pty Ltd. A search of the Fresh Landscape Design Pty Ltd website indicated that the company has won landscape design awards from the Australian Institute of Landscape Design and Manager (AILDM). Fresh Landscape Design Pty Ltd was also included in the AILDM online landscape designer register. Individual Landscape Plans for affected residents were observed to have been signed on the following dates: 17/02/2015, 18/09/2015, 11/11/2015, 12/11/2015, 23/11/2015, 27/01/2016, 28/07/2016. Upon completion of the works Landowners signed Landscaping and Visual Screening Program Works and Maintenance Agreement (completion notice). Site management reported that landowners were happy with the works and outcome. The Complaints Register dated 1 May 2015 to 15 September 2016 did not include any complaints related to VIMRs. One complaint was received on the 22.06.15 regarding visual impacts (amongst other issues). This resident was within 2 km of a turbine and eligible for a VIMR. The site assessment was reportedly completed on the 14.08.15 and no further complaints raised. Whilst it appears that a qualified landscape professional prepared the individual landscape design plans the appointment of the landscape professional by the Secretary could not be demonstrated. Given landscape design and management was a critical element of the Project this condition was found to be an administrative non-compliance.	**Administrative Non-compliance**	-

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
088	9.4	<u>Road Safety Changes</u> A Road Safety Report will be produced after 12 months of operation to identify any road safety changes required along Taralga Road, Bannaby Road, Old Showground Road, and Alders and Creek Road. The report will be compiled in consultation with the RMS and ULSC and must include, but not be limited to, any significant change to motor vehicle accident rates through the comparison of crash data (where available) and analysis of recorded incidents. Reasonable and feasible mitigation measures must be implemented as required by the RMS and ULSC to address the road safety impacts that can be attributed to the Wind Farm. **Frequency:** 12 months after commencement of operation **Management Doc:** Road Safety Report	Site management reported that a Road Safety Report had not been prepared to identify any road safety changes required along Taralga Road, Bannaby Road, Old Showground Road, and Alders and Crees Road. Site management reported that they were not aware of any significant change to motor vehicle accident rates through the comparison of crash data (where available) and analysis of recorded incidents during the operation of the Wind Farm.	**Administrative Non-compliance**	**2016-OFI-19** Prepare a Road Safety Report in consultation with RMS and ULSC.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
089	10.4	Minimise Generation of Waste All waste shall be reduced to the minimum extent that is reasonable and practical **Frequency:** Ongoing	Minimal waste is removed from Site due to the low quantities generated. Where possible the Site minimises waste. Spare parts pallets with fold up boxing are re-used where possible. At the onset of the audit, Vestas reported that it believed general waste was being separated into recyclables and non-recyclables at the Goulburn Management Centre. Vestas was asked to confirm this as part of the audit process and it was discovered this was not the case. As a result Vestas reportedly organised to have four separate bins delivered to site for wood, metal, general waste and cardboard. The delivery and use of these bins for waste segregation was not verified. Waste oil and oily rags were separated and disposed of on an as needed basis.	Not verified	

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
091	10.4	<u>Waste Collection On-site</u> Provision of appropriate domestic and industrial waste collection facilities within the Service Compound to permit appropriate segregation, storage and disposal of waste. These should include rubbish bins, recycling bins, cigarette bins, toilet facilities and designated storage areas for controlled waste. Waste must be classified in accordance with Waste Classification Guidelines Part 1: Classifying Waste (DECC, 2008). All waste receptacles should be properly labelled and all outdoor receptacles covered. All waste hazardous materials will be stored and handled using the measures outlined in the SWMP (Section 5). **Frequency:** Ongoing	One large and one small general waste bin were observed to be located next to the Workshop in the Service Compound. The small bin was covered; however, the larger bin was uncovered at the time of the Site inspection and neither bin was labelled as general waste receptacles. Twelve 200 Litre (L) steel drums were observed to be stored adjacent to the Workshop. Site management reported the drums are used to stored oily rags, empty grease containers and other waste hydrocarbon related to maintenance activities on the WTGs (i.e. on-site away from the Site Compound). It is noted that "*Spills of Hazardous Materials*" and *"Managing Hydrocarbons & Chemicals*" are included in the environmental induction. The environmental induction states *"For any incident, spill or unexpected find that occurs onsite, the following applies:* 1. *Immediate action/contain* 2. *Report* 3. *Investigate* 4. *Remedial works* 5. *Close out* " Waste oil was disposed of in a dedicated 4,000 L double skinned Aboveground Storage Tank (AST) located in the Service Compound. The waste drums were not labelled but had secure lids. A number of the drums were empty. Controlled waste was observed to be placed into a durable plastic bag and then into the drums. Site management reported that no controlled waste (i.e. oily rags, waste oil, chemical waste) had been disposed during the audit period due to the low quantity of waste generated. A cigarette butt container was observed at the entrance to the Site Office.	**Non-compliant** **Low Risk**	**2016-OFI-20** Ensure waste receptacles within the Site Compound are labelled and covered.
092	10.4	<u>Waste Generated On-site, Away From the Service Compound</u> All waste generated by maintenance activities on-site but away from the Service Compound is to be collected and disposed of appropriately at the Service Compound. **Frequency:** Ongoing			

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
094	10.4	<u>Waste Removal from Site</u> Engage a licensed contractor for the regular disposal of: • General waste; • Recyclable materials; and • Controlled waste (e.g. fuel, solvents, oils, contaminated waste and other chemicals). **Frequency:** As required	Site management reported that the local contractor (Tutt Bryant Hire Pty Ltd) does not recycle and that general waste is taken to the Goulburn Waste Management Centre. An Environmental Protection Licence (EPL) for Tutt Bryant Hire Pty Ltd was not available on the NSW Environmental Protection Authority (EPA) Protection of the Environment Public Register. Site management reported that no controlled waste (i.e. oily rags, waste oil, chemical waste) had been disposed during the audit period due to the quantity of waste generated.	**Non-compliant** **Low risk**	**2016-OFI-21** Confirm if the waste contractor is licensed to dispose of waste generated at the Site (i.e. general waste).
108	Table 11 Procedure 7	Restrict lambing to paddocks at least 500m from turbines.	Site management reported that this measure was not feasible to implement as it would require significant fencing to be erected around each WTG and may make certain paddocks not usable due to the restricted area. Site management also indicated that implementation of this requirement would require approval from the landowner as it is not a requirement of the lease conditions and is unlikely to be supported by the landowner. It is noted that the six Wedge-tailed eagle collisions occurred in areas of the Site where lambing had not occurred but where cattle were grazing. Site management were therefore unable to justify the installation of fencing given lambing did not appear to be attracting birdlife. An email from Site management to the Office of Environment and Heritage (OEH) dated 7 October 2016 (12:32am) notes that cattle were present in the paddock when a Wedge-tailed eagle carcass was found on 6 October 2016. OEH specifically asked if lambing may have attracted the bird in their email to site dated 7 October (09:46am). It is noted this requirement was not a mitigation measure proposed in the EIS or specified by a Condition of Consent. Given this, it is recommended that it is removed from the next revision of the BBAMP.	**Non-compliant** Low risk	**2016-OFI-22** Consideration should be given to removing requirement from next revision of BBAMP

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
112	4.0	Noise Compliance Testing Taralga Wind Farm will engage an independent acoustic consultant, approved by the DP&E, within six months of the commencement of operation (at the completion of commissioning) to undertake Initial Compliance Testing, as per Condition 51.	Noise compliance testing was undertaken by Sonus Pty Ltd (Sonus). Sonus produced a Noise Compliance Report (Sonus, November 2015, Ref: S2570C61) and an Addendum Environmental Noise Compliance Report (Sonus, January 2016, Ref: S2570C67). The Addendum report (Sonus, 2016) provided the results of additional monitoring at residences H01 and H77 between the 6 November 2015 and 5 January 2016. Evidence of the approval of Sonus Pty Ltd by the DP&E was not available for review.	Not verified	-
125	5.0	Emergency Preparedness and Response The Emergency Management Committee (EMC) is a committee formed for the planning and monitoring of emergency procedures and consists of representatives from Vestas' Quality, Safety and Environment (QSE) Department, Vestas Employees, the Asset Manager and Local Emergency Services.	Site management reported that an Emergency Management Committee (EMC) had not been formed at the time of the Site inspection. Site management reported that emergency issues are discussed during monthly meetings as well as daily pre-start meetings. It was reported that a recent grass fire evacuation exercise was discussed during a monthly meeting. Fire danger levels were observed as a topic in the daily pre-starts dated 26 and September 2016 and 31 October 2016. It is acknowledged that emergency issues are discussed on a regular basis; however, as the Emergency Management Committee had not been formed during the audit period and no evidence was available to demonstrate that the planning and monitoring of emergency procedures is conducted this requirement was found to be an administrative non-compliance.	**Administrative Non-compliance**	**2016-OFI-23** An Emergency Management Committee (EMC) should be formed and should meet periodically to plan and monitor emergency procedures. Formal minutes of the EMC meeting should be recorded in the document management system.

Audit Ref #	OEMP Ref	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
132	-	-	It is noted the ERP has been prepared to address the requirement of the EPL and Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare and implement a pollution incident response management plan. A detailed review of whether the ERP meets the requirements of Section Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO Regulations) has not been undertaken however there may be some aspects of the requirements that have not been fully documented in the ERP. It is recommended TWF undertake its own gap analysis of the ERP against the POEO Regulations to ensure the specific requirements for pollution incident response management are incorporated.	Not verified	**2016-OFI-26** Undertake a review / gap analysis to ensure the ERP includes the specific requirements outlined in Part 3A of the POEO Regulations for pollution incident response management plans.

6.1 Additional Opportunities for Improvement (not related to non-compliances)

The following table has been reproduced from **Appendix A**. For details on the requirement, and for further discussion of the issue, please refer directly to the table in **Appendix A**. Many recommendations are based around continuous improvement opportunities identified during the audit and do not necessarily represent immediate potential non-compliance issues.

Table 11 Opportunities for Improvement for Requirements Considered Compliant

Audit Ref #	Number	Opportunity for Improvement
004	**2016-OFI-01**	Update the Management Structure and Responsibilities to reflect the existing roles within the next revision of the OEMP.
028	**2016-OFI-06**	Consider adding a column in the Complaints and Enquires Register to detail the complaint category / issue. Consider adding an additional column detailing the follow-up contact with the complainant.
033	**2016-OFI-07a**	Ensure the Environmental Inspection Issue Register is fully completed, kept up-to-date and open actions actively managed.
033	**2016-OFI-07b**	Pro-actively reduce the number of Issues within the Environmental Inspection Issue Register with a status as “Monitor”.
035	**2016-OFI-08**	Consider issuing a formal CAR to address some of the issues identified in the Environmental Inspection Issues Register.
042	**2016-OFI-10**	An alternative control to spraying should be considered and implemented for weed management on land adjacent to landowner’s crops.
060	**2016-OFI-16**	Include the requirement to protect native fauna and flora and not destroy, take, kill, feed or unnecessarily disturb within the next revision of the Site Induction.
064	**2016-OFI-17a**	Update the Flora and Fauna Management Plan and Site Induction to reflect that Class 1, 2 and 5 weeds are notifiable weeds, which require an occupier to notify the Local Control Authority within 24 hours of discovering the classified weed.
064	**2016-OFI-17b**	Consider adding a check within the Environmental Inspection Sheet for the discovery of Class 1, 2 and 5 weeds as a prompt to ensure they are notified.
075	**2016-OFI-18**	Update the Site induction to include graphical reference to known archaeological / heritage sites.
127	**2016-OFI-24**	The Annual Exercise should be documented. A record of the type of incident tested as well as the participants should be noted as well as lessons learnt. Corrective actions should be formally recorded and closed-out.
130	**2016-OFI-25**	At the next review of the OEMP the requirement for the local RFS to inspect fire systems at the Wind Farm and provide recommendations to improve these systems should be reviewed and revised given RFS are unable to provide such advice.

7.0 Limitations of Report

AECOM Australia Pty Limited (AECOM) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Pacific Hydro Pty Ltd and only those third parties who have been authorised in writing by AECOM to rely on this Report.

It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this Report.

It is prepared in accordance with the scope of work and for the purpose outlined in the AECOM Proposal – Taralga Wind Farm – Operational Environmental Impact Audit 2016 (OPP-549160) dated 21 September 2016.

Where this report indicates that information has been provided to AECOM by third parties, AECOM has made no independent verification of this information except as expressly stated in the Report. AECOM assumes no liability for any inaccuracies in or omissions to that information.

This Report was prepared between 11 October 2016 and 5 December 2016 and is based on the conditions encountered and information reviewed at the time of preparation. AECOM disclaims responsibility for any changes that may have occurred after this time.

This report should be read in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

Except as required by law, no third party may use or rely on this report unless otherwise agreed by AECOM in writing. Where such agreement is provided, AECOM will provide a letter of reliance to the agreed third party in the form required by AECOM.

To the extent permitted by law, AECOM expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report. AECOM does not admit that any action, liability or claim may exist or be available to any third party. Except as specifically stated in this section, AECOM does not authorise the use of this report by any third party. It is the responsibility of third parties to independently make inquiries or seek advice in relation to their particular requirements and proposed use of the Site.

Appendix A

OEMP Audit Checklist

Appendix A OEMP Audit Checklist

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
2.0 Environmental Policy					
001	2.2	The Environmental Policy is available on the Taralga Wind Farm (TWF) document management system, displayed in a prominent location in the Service Compound and is a central component of the Site Induction training for all Site Staff	The Taralga Environment Policy dated June 2015 and Vestas Quality, Health, Safety and Environment Policy dated October 2015 were sighted displayed on a noticeboard at the entrance log in / log off desk. The Environmental Policy was included in the Environmental Induction and the Vestas Contractor Induction.	Compliant	-
3.0 Management Structure and Responsibilities					
002	3.1	The Chief Operations Officer has primary responsibility for the overall management of the Wind Farm. In the context of this OEMP, this person's primary responsibilities are as outlined in Section 3.1	It was reported that the Chief Operations Officer undertakes the responsibilities outlined in Section 3.1. The Chief Operations Officer was not available for interview during the Site inspection.	Compliant	-
003	3.2	The Site Manager has primary responsibility for the day-to-day management of the Wind Farm and is responsible for implementing the environmental requirements within the OEMP. Specific responsibilities are outlined in Section 3.2	The role of the Site Manager is undertaken by the CWP Renewables Asset Manager. Interviews with the Asset Manager and a review of documents maintained confirmed that the Asset Manager was generally implementing the responsibilities assigned to the Site Manager and the Communications and Compliance Manager.	Compliant	-
004	3.3	Responsibilities of the Communications and Compliance Manager are outlined in Section 3.3	The role of the Communications and Compliance Manager was undertaken by the Asset Manager.	Compliant	**2016-OFI-01** Update the Management Structure and Responsibilities to reflect the existing roles within the next revision of the OEMP.
005	3.4	Responsibilities of the Site Supervisor are outlined in Section 3.4	The Site Supervisor role is undertaken by Vestas. Interviews with the Site Supervisor confirmed responsibilities were generally being undertaken.	Compliant	-
006	3.5	Responsibilities of the Quality, Safety and Environment (QSE) Manager are outlined in Section 3.5	The QSE Manager role is undertaken by Vestas. Interviews with the Site Supervisor confirmed responsibilities were generally being undertaken.	Compliant	-
007	3.6	In addition to the management positions referred to above, there will be a number of service technicians (WTG and BoP) and administrative staff working regularly on the Site. These parties operate under long term pre-established contracts, and are therefore collectively termed site staff. Site Staff responsibilities are outlined in Section 3.6	The Site Induction was noted to include environmental responsibilities for Site personnel, contractors and visitors.	Compliant	-
008	3.7	A small pool of subcontractors, primarily civil contractors and consultants engaged on technical and compliance matters, will be utilised on-site. Where engaged, these subcontractors will be required to comply with the requirements summarised in Section 3.7	Sub-contractors were not interviewed during the Site inspection; however, the Site Induction was noted to include their environmental responsibilities. Evidence that subcontractors had conducted the Site Induction was sighted for sub-contractors that were on-site on the day of the Site inspection.	Compliant	-
009	3.8	The Environmental Representative (ER) is an independent consultant who is the primary contact point in relation to the environmental performance of the Wind Farm and is required under Condition 27. Responsibilities of the ER are summarised in Section 3.8.	The Environmental Representative (ER) Molino Stewart Pty Ltd continues to be involved in the Project. The ER"s contact details were available on the Wind Farm website.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
010	3.9	All visitors to the Site will be made aware of any key environmental and safety matters associated with their visit. Visitors will undergo a Site Induction (a simpler version than the induction given to site staff, subcontractors and consultants) covering both environmental requirements and safety.	The auditors undertook the Environmental Induction. The induction covered the key environmental and safety requirements. The Vesta Contractor Induction was available for review.	Compliant	-
4.0 Management Systems					
011	4.1	<u>Information Management</u> TWF maintains a hosted document management system specifically tailored as a central repository of all Wind Farm information including that associated with this OEMP.	The Wind Farm has a dedicated 'Wiki' page which acts as a depository for Project information. It was noted that some information was stored on the Wiki, some information was stored as hard copies and some information was stored on standalone hard drives due to local internet connectivity issues impacting upload to the Wiki. Given the potential for key documents to misplaced or lost due to the three separate document control systems in use at the time of the Site inspection, this requirement was found to be an administrative non-compliance.	**Administrative Non-compliance**	**2016-OFI-02** Critical site management documents should be stored and maintained in the official hosted document management system.
012	4.1	A Project Calendar is maintained on the document management system to record and alert staff to all critical dates for compliance, inspections, audits and reviews?	The Asset Manager used their Microsoft Outlook calendar for Project related compliance management and upcoming tasks. The calendar was noted to include critical dates including upcoming audits, monthly environmental inspections, licence expiry and EPL Annual Returns.	Compliant	-
013	4.1	Site staff responsible for record keeping shall ensure records are complete, legible, generated on approved forms, identifiable, traceable and signed where required. All documents must be kept for at least four years after the monitoring or event to which they relate took place. The record of a complaint must be kept for at least seven years after the complaint was made.	Records including inspections, monitoring results and complaints relating to operations were available for review.	Compliant	-
014	4.1	Documents will be indexed and stored both electronically in the document management system and in the Wind Farm's hard-copy filing system. These documents include: • This OEMP; • All management documents listed in Appendix D; • Reports produced, including those listed in Section 4.2; • The current version of the EPL (number 20429); and • Any other permits that may be obtained during Wind Farm operation.	Documents were sighted to be filed either in hard copy and /or electronically.	Compliant	-
015	4.2	<u>Environmental Reporting</u> The table below lists the reports associated with the OEMP that will be prepared and submitted to regulatory authorities in accordance with the Conditions of Consent and EPL. Due dates for each report are noted in the *Project Calendar.* Subject to confidentiality, the reports will be made publically available on the Wind Farm website following approval by the DPE or issuing to the relevant government agency, as per Condition 9.	The following is noted: - The *Noise Compliance Report* was available on website - The *Operation Environmental Impact Audit Report*: This report, pending upload. - The *Road Safety Report* had not been completed at the time of the Site inspection (refer to #088) - The *Visual Impact Mitigation Reports* contain confidential information and are therefore not publicly available - The *EPL Annual Return* was not available on website at the time of the Site inspection.	**Administrative Non-compliance**	**2016-OFI-03** The EPL Annual Return should be made available on the Wind Farm website.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
016	4.3	WTG Operations Condition 117 states that any individual WTG that ceases operating for a period of more than 12 consecutive months must be dismantled within 18 months of this 12 month period, unless otherwise agreed by the Secretary. Independently verified records of WTG use for electricity generation must be kept. TWF receives regular reports from the WTG Maintenance Contractor on individual WTG performance. These records can be provided to the Secretary and independently verified upon request.	Condition 117 of the Project Approval had not been triggered at the time of the Site inspection. The Asset Manager reported that Vestas provides monthly reports concerning Wind Turbine Generator (WTG) performance. Site management reported that the Secretary has not requested these records at the time of the Site inspection.	Not triggered	-
017	4.4	Compliance Management A *Compliance Register* is maintained which lists all the relevant legislation and regulations that are applicable to the Wind Farm and where applicable, notes where they are addressed by the OEMP. All requirements, relevant to the OEMP can be found in Appendix B. A full list of Environmental Legislation and Regulatory Requirements is provided in Appendix C.	A Compliance Register has been developed and was maintained by the Project's Environmental Representative.	Compliant	
018	4.4	The *Compliance Register* is reviewed annually as part of an internal management review process.	The Taralga Wind Farm Environmental Compliance Report, November 2016 (Molino Stewart Pty Ltd, 0339 TWF Environmental Compliance Audit Final report V2) was available for review. The Report was prepared to assess environmental compliance against NSW legislation, Conditions of Consent, Equator Principals and International Finance Corporation and World Bank performance standards and is reportedly prepared annually. Whilst not formally constituting a review of the Compliance Register, the report reviews environmental compliance and is considered to serve the same purpose.	Compliant	
019	4.5	Risk Management A *Risk Management Assessment Procedure* is maintained at the Wind Farm. Risks associated with Wind Farm operation are reviewed annually or as required based on events or legislative changes.	It was reported that legislative changes were managed through the CWP Newcastle office and that Site would be notified of any changes. The Risk Management Assessment Procedure was not available for review and on this basis this requirement has been assessed as not verified. Risks related to environmental issues are detailed in the sub plans of the OEMP and are reportedly reviewed as part of the OEMP review process. The OEMP has yet to be reviewed (refer #038). A separate site wide risk assessment is not routinely conducted. Instead risk assessments are undertaken on a task basis through Job Safety Environmental Analysis (JSEAs).	Not verified	**2016-OFI-04** Maintain a Risk Management Procedure.
020	4.6	Training and Environmental Awareness All site staff, subcontractors and consultants will be required to undergo a comprehensive Site Induction which will include information on standard environmental practices on-site. The Site Induction will include information on: • The objectives of the OEMP and Environmental Policy; • Key environmental risks and requirements; • Site rules; • Emergency and evacuation procedures; • Driver's Code of Conduct and traffic awareness; • The roles and responsibilities of site staff, subcontractors and consultants in relation to environmental management; and • An outline of the process for recording Incidents, near misses and hazards.	The Site has developed an Environmental Induction which is included within the comprehensive Vesta Contractor Induction given by Vestas to staff, subcontractors and consultants. The auditors reviewed the environmental induction and noted it included the elements listed. The Induction includes an assessment form which participants are required to complete and which gets scanned and filed as a record of their induction. The auditors sighted a selection of induction records.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
021	4.6	Toolbox Talks will be undertaken on a weekly basis. A 'Toolbox Talk' is a short discussion of health, safety and environmental requirements delivered at the commencement of a shift that is usually directly applicable to the work about to be undertaken.	Vestas conducts a Daily Pre-Start which includes general safety information, wind forecast, fire risk, recent incidents, safety alerts, hazard observations and issues to raise (sighted examples dated 26/10/2016, 28/10/2016 and 31/10/2016). Once per month Vestas conducts a more detailed Monthly Toolbox. Examples of meeting minutes dated 22.06.16 and 17.09.16 were sighted.	Compliant	
022	4.6	Additional training will be provided, where required, to site staff and subcontractors to ensure that they are aware of environmental issues related to their specific areas of work. Training undertaken will be recorded in a Verification of Competency & Training Register, including any Site Induction undertaken.	It was reported that Brett Lane and Associates Pty Ltd (bird and bat consultants) conducted a one day bird and bat awareness training session with the Asset Manager at the commencement of bird and bat monitoring program. Site management reported that this was a more informal training session and records were not maintained. No other formal environmental training was reportedly undertaken. Vestas maintains a training register for tracking formal training and qualifications of its staff. The system was demonstrated during the Site inspection. Site Induction records were sighted during the audit.	Compliant	-
023	4.7	<u>Environmental Incidents</u> An environmental Incident can include: • Spill of fuel, oil chemical or other hazardous materials • Failure of erosion / sediment control • Contamination of surface water, groundwater or land • Breach of licence, permit condition or legislative requirements • Damage to vegetation marked for protection • Discovery or damage to cultural heritage materials or sites • A complaint arising from an environmental issue such as noise The Incident Reporting Protocol is to be followed in the event of an environmental incident. The protocol is accessible to all Site Staff on the TWF document management system and summarised in the OEMP	Incidents were reported using the Vestas Incident Management System, 360 Incident database (IDB). IDB and the process of logging incidents was demonstrated during the Site inspection. Six incidents had been logged under the category "environmental accident". These included collisions with livestock or kangaroos, pest control and a grass fire within 3 kilometres of the Site. None of the incidents related to pollution events. It was noted that some environmental incidents were not being recorded in the IDB. For example, failure of erosion and sediment control (refer # 049), failure of rehabilitation to establish and bird / bat strikes (refer #104). These were being recorded as issues in the Environmental Inspection Issues Register or in the case of bird/bat strikes a separate incident form completed for OEH. It is considered that these should be logged as environmental incidents within IDB to ensure incidents are reflected and to facilitate formal close out of actions (in particular where sub-contractors are responsible for completing remedial works). The auditors considered the current practice of logging complaints in the Complaints and Enquiries Register appropriate rather than as incidents. There had been no environmental incidents causing or threatening material harm to the environment and therefore the external reporting requirements of the Incident Reporting Protocol had not been triggered.	**Administrative Non-Compliance**	**2016-OFI-05** Expand the current practice of logging incidents to include environmental incidents identified in the OEMP (such as failure of erosion / sediment control, failure of re-seeding to establish, bird / bat strikes).
024	4.7	An *Incidents Register* is maintained on the TWF document management system. All site staff are required to use this system to report incidents and are provided appropriate access. This is in addition to any reporting requirements for their own employers.	As described above, IDB is used to record and manage incidents. It was reported that for incidents raised by the Asset Manager, Vestas would be notified by email so that the incident could be logged into IDB. Refer also to #059.	Compliant	-
025	4.7	The *Incident Register* is designed to record a broad range of incidents, including environmental incidents. It will also record the action that is taken to manage them, based on the various management strategies outlined in this OEMP and associated sub-plans.	The functionality of IDB was demonstrated during the Site inspection. IDB was noted to include sections for reporting incident investigations, allocating tasks to carry out corrective actions and uploading reports, documents or photos. It was reported that IDB allows for task tracking and escalation with notifications sent to the responsible personnel. A summary of incidents (including environmental) is provided by Vestas to CWP as part of the Monthly Customer Report (sighted May 2016 and September 2016).	Compliant	-
026	4.8	<u>Complaints</u> A permanent notice board is located in the post office in Taralga Village with information that advertises the Wind Farm website address, email address, postal address and telephone number for complaints is provided on notice boards in Taralga Village.	The notice board at the Taralga Village post office was not inspected. The email address, postal address and telephone number for complaints are available on the Wind Farm website.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
027	4.8	All complaints, including those regarding environmental matters, are recorded in the *Complaints Register.* This register is maintained as an online database and a redacted copy of the database is uploaded to the Wind Farm website at the start of every month for public viewing	The Wind Farm maintains an Excel® Complaints and Enquires Register with two spreadsheets, one containing the detailed comments and the other the redacted version for the website. At the time of the Site inspection, the Wind Farm website included the redacted copy of the register up until September 2016.	Compliant	-
028	4.8	The *Complaints Register* will be maintained by the Communications and Compliance Manager who will be responsible for responding to complaints with the assistance of other staff members where required. The ER will be notified of all complaints received and will participate in the complaint process and provide advice on a suitable response and actions, if required.	The Complaints and Enquires Register was being maintained by the Asset Manager. The Asset Manager was responsible for responding to complaints with assistance from other staff members were required. It was reported that the ER was notified of complaints as required. The Complaints and Enquires Register was noted to include: date, time, type (complaint / enquiry), complainant details (name, address, phone, email), method (phone, email), detailed summary, detailed response / action and status. The register could be improved by including a column detailing the complaint category (e.g. noise, visual, TV signal etc.). This would assist in analysis / trend identification and reporting. In addition the Detailed Response / Action category often detailed the initial response taken and didn't necessarily include details of subsequent follow up actions including whether the complainant was satisfied with the response.	Compliant	**2016-OFI-06** Consider adding a column in the Complaints and Enquires Register to detail the complaint category / issue. Consider adding an additional column detailing the follow-up contact with the complainant.
029	4.8	Complaints that are of a serious nature will be reported to the Chief Operations Officer and may also be logged as an incident in the *Incident Register*	No complaints were received that were considered by Site management or the auditors to be logged as an incident during the audit period.	Not triggered	-
030	4.9	<u>Community Consultative Committee (CCC)</u> The committee will determine the frequency of meetings during operations but will likely reduce the number of meetings per year as the Wind Farm becomes more established. The Draft NSW Guidelines recommend meeting: • Every three or four months during the first two years following commencement of construction; and • Twice a year after the first two years of operations.	The Community Consultative Committee (CCC) met quarterly during operations with the last meeting held in February 2016. At this meeting the CCC decided to reduce the number of meetings to annually. The next meeting is scheduled for February 2017. This was decision was passed unanimously by those present at the February 2016 meeting. CCC meeting minutes are available on the Wind Farm website.	Compliant	-
031	4.9	CCC meetings are organised by the Communications and Compliance Manager and attended by the Site Manager and other Wind Farm representatives, depending on the agenda. Minutes of meetings are posted on the Wind Farm website once endorsed by the chairperson.	The CCC meetings were organised and attended by the Asset Manager (acting as the Communications and Compliance Manager and the Site Manager). The CCC includes local residents, a member from the Australian Wind Alliance and an independent Chair-person. A representative from OEH is invited to the meeting. CCC meeting minutes are available on the Wind Farm website.	Compliant	-
032	4.10	<u>Inspections</u> Regular inspections of operational activities and environmental performance will be undertaken by the Site Manager and Site Supervisor. Those relevant to environmental management are: • Erosion, sediment controls and containment systems (e.g. oil separators in substation); • Weeds; • Rehabilitated grasses and vegetation; • Animal carcasses around road sides, hardstands and culverts; • Safety equipment; and • Hazardous materials and waste.	The Asset Manager conducts monthly environmental inspections and records his findings on the Environmental Inspection Sheet. The Inspection Sheet has prompts for checking the WTGs, roads, drains, culverts, erosion control, revegetation, weeds, Asset Protection Zone (APZ) and fauna. The inspection sheet for the Substation, Site Office and Workshop also included a check of oil containment, sewerage, water tank overflow, waste and hazmat/chemical storage. Maps note the location of issues and photographs are also taken. The auditors reviewed a selection of Environmental Inspection Sheets and considered them to be clearly documented and the maps were well annotated to indicate the location of the identified issues.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
033	4.10	Completed checklists will be recorded and stored on-Site. Any item identified during an inspection that requires investigation will be managed through the *Incident Register* and corrective actions	Completed checklists were filed in hard copy and more recently scanned and filed electronically. Issues identified during Site inspections were being managed through Environmental Inspection Issue Register rather than through the IDB which is managed by Vestas. The Environmental Inspection Issue Register details the location, date identified, issue, status, action, responsible party and close date. The register was last updated in July 2016. It is noted that some items with status listed as "Monitor" dated back to mid-2015. These items typically did not include a corrective action. Refer also to #023 regarding logging of some issues identified during Site Inspections (e.g. failure of sediment and erosion controls or rehabilitation) as environmental incidents.	Compliant	**2016-OFI-07a** Ensure the Environmental Inspection Issue Register is fully completed, kept up-to-date and open actions actively managed. **2016-OFI-07b** Pro-actively reduce the number of Issues within the Environmental Inspection Issue Register with a status as "Monitor".
034	4.10	The effectiveness of the inspections will be reviewed as part of internal management reviews and where necessary, the level, scope and timing of inspections will be improved through the life of the Wind Farm to achieve the required environmental performance.	Site management considered that the level, scope and timing of the inspections were appropriate to the activities being conducted at the Site. It was reported that once the rehabilitated areas were stable, Site management would consider reducing the frequency of the inspections. The auditors concur with the level, scope and timing of the inspections.	Compliant	-
035	4.11	<u>Corrective Actions</u> Where matters of non-conformance with Conditions of Consent and EPL or matters of environmental harm are identified through either inspections, audits or complaints, and it is established through investigation that corrective actions are required to be undertaken, then a *Corrective Action Request* (CAR) is generated, in line with the internal procedure for undertaking corrective actions.	No formal Corrective Action Requests (CARs) had been generated during the audit period. No non-compliances with Conditions of Consent, the site's EPL or matters of environmental harm had been identified internally by the wind farm during the audit period and hence no formal corrective actions had been required. The Environmental Inspection Issue Register was the main tool used to manage close out of actions. Where this required corrective actions to be undertaken by others they were communicated using emails and personal communication. It is considered that some of the actions identified in the Environmental Inspection Issue Register should be managed by issuing a formal CAR.	Compliant	**2016-OFI-08** Consider issuing a formal CAR to address some of the issues identified in the Environmental Inspection Issues Register.
036	4.11	Corrective actions are completed by the persons delegated and the follow up of CARs is the responsibility of the Site Manager. All CARs are recorded in the document management system to ensure that the CAR is tracked and implemented.	No formal CARs had been generated during the audit period.	Not triggered	-
037	4.12	<u>Independent Audit</u> An Operation Environmental Impact Audit Report must be prepared and submitted to the DPE within six weeks after a 12 month period of operation (post commissioning) and then at any additional periods requested by the DPE.	This audit represents the Operation Environmental Impact Audit. The auditors were approved by the DP&E and an extension of time provided by DPE letter dated 4 October 2016.	Compliant	-
038	4.13	<u>OEMP Review</u> The OEMP will be formally reviewed within three years of the commencement of operation (post commissioning) and at least every three years after that.	There have been no changes to OEMP since it was approved on 22 June 2015. The first formal review is due in September 2018.	Not triggered	-
039	4.13	Minor changes to the OEMP may occur on a regular basis during operation. The ER will be provided with any changes made to the OEMP for comment and the ER will also advise on whether the changes are significant or substantial enough to require further consultation with Relevant Government Agencies and/or approval from the DPE.	There have been no changes to the OEMP since it was approved 22 June 2015.	Not triggered	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
040	4.13	All changes made to the OEMP will be controlled and it will be the responsibility of the Site Manager or delegate to ensure that new versions are distributed to those on the document Distribution List and any changes to the OEMP are communicated to Site Staff.	There have been no changes to the OEMP since it was approved 22 June 2015.	Not triggered	-
5.0 Soil and Water Management Plan					
041	5.4	<u>Seeding of Disturbed Areas *^</u> Disturbed areas between T20 and T27 are to be re-seeded with native Wallaby Grass (5 kg/ha) and Sterile Ryecorn (20 kg/ha). All other disturbed areas will be re-seeded with a mix that includes Australian Phalaris, Tekapo cocksfoot, Lakota prairie grass, Goulburn sub clover, Leura sub clover and Ryecorn (25 kg/ha as a seed mix). Diammonium phosphate (DAP) fertiliser is to be applied at 100 kg/ha if broadcast or 200 kg/ha if hydroseeded. **Frequency:** As required, until rehabilitation has satisfactorily stabilised	Site management reported that ridge line WTG's, including the areas between WTG20 and WTG27 were seeded with native Wallaby Grass; however; seeding in this area had not established as expected (refer to photographs 4-1 to 4-3). During the Site inspection it was observed that small loose rocks in this area were providing cover helping to protect and minimise soil erosion; however, while evidence of seedlings were sighted, coverage was sporadic. It was noted that topsoil was limited in the tree line of the ridge and that leaf litter appeared to be the main groundcover material. Disturbed areas had been seeded by Downer EDI progressively as construction works were completed during period 2014 to 2015. Site management reported that re-seeding was completed in October 2015. Evidence of established seeding adjacent to access roads, around the bases of the WTG and in surface water channels was observed off the ridge line (i.e. WTG20 to WTG31). During the Site inspection it was observed that rehabilitation had also not fully established between WTG28 and WTG31 on the ridge line. Evidence of scouring was observed in the surface water channels adjacent to the access road. Site management reported that the responsibility for re-seeding disturbed areas on the ridge line would be with Vestas (the EPC) and their contractor (EDI Downer). The auditors consider there is a potential risk that disturbed areas on the ridge line may be re-seeded without due consideration as to the root cause of the lack of re-growth (e.g. structural / soil / water retention etc.) and that specialist advice should be considered prior to any re-seeding in this area. Given the disturbed areas between WTG20 and WTG27 require further work until a satisfactory level of rehabilitation is achieved this requirement is considered to be ongoing and was found to be not verified.	Not Verified	**2016-OFI-09** Consider engaging a specialist rehabilitation consultant to review the re-seeding options for the ridge line (i.e. between WTG20 and WTG31). Implement any recommendations provided by the specialist and monitor and manage the progress of re-seeding on the ridge line on a regular basis until the vegetation is self-sustaining and meets the requirements of the landowner.
042	5.4	<u>Revegetation Maintenance Program *^</u> Monitoring of success of re-seeding. Where re-seeding fails, ongoing re-application of seed is to continue along with watering and weed spraying until such time as re-seeding is successful. Soil disturbance may be required to break up any hard crust that has formed or other soil amelioration used if rehabilitation is not successful. Site wide monitoring will be performed monthly with more regular inspection of specific areas (those underperforming and requiring additional rehabilitation work) on a more regular basis. **Frequency:** Monthly monitoring, re-seeding as required. **Management doc**: Environmental Site Inspection Incident Register	Monitoring of re-seeding success was undertaken by the Asset Manager as part of the monthly Environmental Inspections. Isolated areas of disturbed land were observed adjacent to the access roads. These areas had been identified in monthly Environmental Inspections. It is noted that some areas had been impacted by livestock reducing the potential for seeding success. Site management reported that remediation was underway for areas where reseeding had not established. The Environmental Inspection Issue Register was sighted that included references to *"patchy rehab, erosion in drains, sediment build up*". The Register notes that the Asset Manager had notified Vestas, EDI Downer to the issues and generally included observations concerning rehabilitation and sediment and erosion. The following Environmental Inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. It is noted that the Environmental Inspection Sheet (Rev A- 26 Aug 2015) included categories for "*WTGs, Roads, Drains, Culverts, Erosion Control, Revegetation, Weeds, APZ, Fauna and Other*". Site management reported that Taralga Rural Pty Ltd conducted spraying of weeds. It is noted that: • One landowner requested weed spraying not be conducted in the vicinity of their crop; and • One landowner requested the Site supply the weed spray and that the landowner conduct the spraying themselves. Site management reported that they agreed to both requests. Weeds were observed on land where a landowner had requested the area not be sprayed due to a nearby crop.	Compliant	**2016-OFI-10** An alternative control to spraying should be considered and implemented for weed management on land adjacent to landowner's crops.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
043	5.4	<u>Fencing off of Rehabilitation Areas *^</u> On-site high erosion hazards areas will be fenced off from livestock. These areas will include the: • eastern end of the T58 hardstand; and • northern side of the T49 hardstand. Other areas may be identified as construction is completed. High risk areas are shown in Drawings EV05 to EV07 in Appendix F. **Frequency:** As required. **Management doc**: Environmental Site Inspection	Site management reported that the location of WTG49 had to be moved due to an identified heritage zone. This resulted in a steeper embankment to the north of the work pad that required seeding. At the time of the Site inspection rehabilitation to the WTG49 embankment was not established and the area was not fenced off to protect against livestock. Evidence of livestock hoof marks was observed on the embankment during the Site inspection. The Environmental Inspection Issue Register included references to "*poor rehab*" and "*It appears that grass seed washed away from steeper areas leading to erosion and sediment build up*". The Register notes that the Asset Manager had notified Vestas, EDI Downer to the issues. Revegetation at WTG58 was considered to be satisfactory at the time of the Site inspection and no fencing was required. The following Environmental Inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. Site management reported that there were no other areas on-site that required fencing to protect against livestock and none were observed by the auditors. On the basis that the high erosion hazard area at WTG49 had not been fenced off, this requirement has been assessed as non-compliant. The potential for environmental consequences was considered low due to the low sensitivity of the receiving environment for sediment (cattle paddock with no surface water drains in the vicinity).	**Non-compliant** **Low Risk**	**2016-OFI-11** The embankment to the north of WTG49 should be re-seeded and fenced to protect against livestock. Monitor and manage the progress of re-seeding on a regular basis until the vegetation is self-sustaining and it meets the requirements of the landowner.
044	5.4	<u>Road Maintenance and Excavation Procedure *+</u> Road maintenance will require the grading of access roads. Excavation may be required for the maintenance of road drainage and electrical cables. A Work Method Statement (WMS) is required for any road maintenance and excavation that is to be undertaken outside of the existing road and hardstand network. The WMS will contain a risk assessment and will consider any environmentally sensitive areas as shown on the Site Plan in Appendix A. The procedures outlined in the Excavation and Penetration Access Practice will be followed for an excavation, regardless of location. The disturbance of soil in drains or other soil disturbance may require the use of erosion control measures as outlined in Maintenance of sediment and erosion control below. **Frequency:** As required **Management Doc:** WMS and Excavation and Penetration Access Practice	Road maintenance was recently undertaken on the main access road from Bannaby Road to the Site compound by contractor's Divall's Earthmoving and Bulk Haulage Pty Ltd. Sighted a quotation for the works dated 7 September 2016. A letter from Divall's Earthmoving and Bulk Haulage Pty Ltd to the Site dated 7 October 2016 stated "*the Road Base that has been supplied to your project from our Carrick Quarry. The prepared material is crushed Road Base that is manufactured from Virgin Excavated Natural Material (VENM) and weed free".* Site management reported that the contractor did a Safe Work Method Statement which included some environmental issues e.g. dust. It was reported that road maintenance and excavation has not been undertaken outside the existing road and hardstand network during the audit period. The requirement for the Excavation and Penetration Access Practice has not been triggered.	Compliant	-
045	5.4	<u>Shared Public Road Maintenance~</u> ULSC should be consulted before any maintenance work is undertaken on public roads. Section 138 approval may be required if substantial works are required. **Frequency:** As required	Site management reported that no maintenance on public roads has been undertaken during the operational phase of the Wind Farm.	Not triggered	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
046	5.4	<u>Work Near Watercourses</u> Any work, including underground cable, road and culvert maintenance, within 40 m of a watercourse may require: • 'Controlled Activity Approval' (CAA) under the Water Management Act 2000.; or • A Part 7 Fisheries Management Act permit. Watercourse crossings that had the potential to require CAA during initial construction are shown in Drawings EV05 to EV07 in Appendix F. After consultation with the Office of Water, some watercourse crossings were ruled out and CAAs were obtained for major crossings at: • Old Showground Road • Track 11 (between T28 and T29) • Track 8 (Riparosso Rd) Approval and permit requirements will need to be considered as part of the WMS to be completed for any work outside of the existing road and hardstand network (see management control road maintenance and excavation procedure). **Frequency:** As required **Management Doc:** WMS; Excavation and Penetration Access Practice	Site management reported that that there had been no instances of work outside the existing road and hardstand network and therefore within 40 m of a watercourse during the operational phase of the Wind Farm. No work areas within 40 m of a watercourse or vehicle tracks from Site roads and hardstands onto vegetated areas were observed during the Site inspection.	Not triggered	-
047	5.4	<u>Imported fill</u> Any imported fill used on-site for road maintenance must be Virgin Excavated Natural Material as defined in the EPA's publication "Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes". **Frequency:** As required	Site management reported that there has only been one instance of imported fill being brought onto Site during the audit period. A letter from Divall's Earthmoving and Bulk Haulage Pty Ltd to the Site dated 7 October 2016 stated "*the Road Base that has been supplied to your project from our Carrick Quarry. The prepared material is crushed Road Base that is manufactured from Virgin Excavated Natural Material (VENM) and weed free".*	Compliant	-
048	5.4	<u>Access off Site roads and Hardstands Prohibited*</u> Access by vehicle off Site roads and hardstands is prohibited to minimise impacts on native vegetation. Other than emergency situations, any vehicular access off Site roads and hardstands will require a WMS which considers all risks, including weed spread, and outlines mitigation measures to avoid impacts. **Frequency:** As required **Management Doc:** Site Induction; WMS	Site management reported that there have been no instances of off-road access reported or recorded during the audit period. No vehicle tracks were observed from Site roads and hardstands onto vegetated areas during the Site inspection. It is noted that landowners may periodically access areas of their land from the Site roads. The Environmental Induction includes the requirement to stay on Site roads.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
049	5.4	<u>Maintenance of Erosion and Sediment Control</u> Inspection of erosion and sediment control measures on a monthly basis and after significant rainfall (more than 15mm in one hour or more than 30mm over 24 hours). Repairs to be undertaken as required, including cleaning out of barriers and removal of sediment. Repairs may also include barrier replacement, or additional measures where soil disturbance has occurred due to maintenance activities or erosion risk is identified. Design drawings of barriers to be used are provided in Appendix F. Rock check banks (Drawing SD5-4) were found to be most effective barrier during construction while straw bales (Drawing SD6-7) were also used for short term measures if not located in stocked paddocks. The maximum spacing of barriers is given in Drawings EV05 to EV07 in Appendix F. Sediment basins at the Service Compound and at significant drainage line crossings will be maintained for the life of the Wind Farm. Other temporary sediment basins (at crane hardstands and access tracks) and erosion control barriers will be removed only after rehabilitation works have been completed on more than 90% of the contributing catchment. In the event of the failure of erosion/sediment control the Incident Reporting Protocol must be followed. A report of the incident will be documented showing date, nature of incident action taken (photographs if possible) with details entered into the Incident Register. **Frequency:** Monitoring monthly and maintenance as required **Management Doc:** Environmental Site Inspection	The following Environmental Inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. The Environmental Inspection Issue Register was noted to include erosion and sediment issues for specific locations across the Site. The Register noted that the responsibility of the identified erosion issues was with EPC and their contractor. The Asset Manager was responsible for the management of rock check dams and culverts. Monthly Environmental Inspections note if an inspection was conducted after a rain event. Sighted an inspection form dated 14 July 2016 following a rain event. Site management reported that they had commissioned Divall's Earthmoving and Bulk Haulage Pty Ltd to clean out the surface water drain at the Ainsworth Crossing and replace rock where necessary. The sediment basin and associated drains were observed at the compound during the Site inspection. Site management reported that some landholders had requested that sediment basins used during construction activities remain so that they could be used for watering their livestock. Grass was observed to be established in sediment in some surface water drains on the lower section of the Site. Site management reported that the decision had been made to leave the grassed sediment in place rather than remove it and expose bare soil which may lead to future sediment issues. The auditors concur with Site management's process to leave established grass in surface water channels where sediment may have accumulated; however, the source of the sediment should be determined, adequacy of remaining capacity assessed and measures taken to prevent further accumulation. <u>WTG49</u> Scouring of the surface water channels/culverts was observed adjacent to the access road above WTG49 (see photographs 4-11 to 4-14). Erosion was also observed to the surface water run off area on landholders land adjacent to WTG49. Site management reported that the landowner was aware of the erosion issues on the land and that remediation works for the drainage channels and disposal area was the responsibility of the EPC and their subcontractor given it was a likely design issue and was within the contracted warranty period for the Wind Farm. The erosion issues at WTG49 had been included in the CWP Environmental Inspection Issue Register but not been entered as an incident into Vestas IDB. The Vesta IDB System is a more formal incident management system that allows for corrective action tacking and escalation.	**Non-compliant** **Medium Risk**	**2016-OFI-12a** The source of sediment in drainage channels within the lower section of the site should be investigated and measures taken to prevent further accumulation. Consideration should be given to increasing the water-holding capacity of rock check dams where grassed sediment has accumulated. **2016-OFI-12b** The layout, design and spacing of interception structures of the surface water drains/culverts around WTG49 should be assessed to ensure it complies with the Landcom, 2004 publication, *Managing Urban Stormwater: Soils and Construction* (Blue Book). **2016-OFI-12c** Vegetation cover should be established on the sill and disposal area on the landholders land adjacent to WTG49 and the area should be fenced to exclude livestock if grazing or tracking is likely to impact re-vegetation. **2016-OFI-12d** The erosion of surface water drains/culverts and the disposal area at WTG49 should be logged as an incident in the Vestas IDB system and formally tracked until the issue has been closed.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
050	5.4	<u>Rehabilitation of Localised Erosion</u> Rehabilitation will be undertaken to correct on-site and construction related localised erosion as required. Methods used may include: • Use of a dense-graded base for stabilisation; • Repairs to drainage across tracks; and • Revegetation of drainage lines and batters and the placement of additional erosion control barriers as outlined in the control Maintenance of erosion and sediment control. **Frequency:** As required **Management Doc:** Environmental Site Inspection; Incident Register	Site management reported that the WTG49 bank was the main area of concern with regards to rehabilitation from on-site and construction related erosion issues. Remediation works for the WTG49 area are the responsibility of the EPC and their subcontractor given the issues occurred within the contracted warranty period for the Wind Farm.	Compliant	Refer to **2016-OFI-12b**, **2016-OFI-12c** and **2016-OFI-12d**

051	5.4	<u>Maintenance Remediation Requirements</u>
		
		Where off-site areas are disturbed during required maintenance, rehabilitation will occur as follows:
		• Erosion and sediment controls installed prior to commencement of works (as per Maintenance of erosion and sediment control);
		• Re-seeding and a weed spraying regime to be implement promptly;
		• Slopes exceeding 15% being prioritised for stabilisation; and
		• Soil preparation to be undertaken prior to seeding:
		  ○ Scarification of surface along contour before placing topsoil to provide keying for topsoil,
		  ○ 40 – 60 mm of topsoil used on slopes exceeding 25 %,
		  ○ 75 mm of topsoil on slopes less than 25 %.
		
		Frequency: As required
		
		Management Doc: WMS
			Other than the surface water run-off area adjacent to WTG49 Site management reported that no off-site areas had been disturbed during operations.	Not triggered	Refer to **2016-OFI-12b**, **2016-OFI-12c** and **2016-OFI-12d**

052	5.4	<u>Substation and Service Compound Drainage Maintenance</u> System designed to ensure that stormwater flows into established drainage systems and away from the Service Compound which contains the on-site septic tank. Drawings TAR-C-501, H01 and H02 in Appendix F show the drainage and hydraulic design of the Service Compound and location of the stormwater/water tank overflow and septic system irrigation area. **Frequency:** As required **Management Doc:** Environmental Site Inspection	The sediment basin and associated drains were observed at the Service Compound during the Site inspection. The surface water system at the substation and Service Compound appeared to be draining as designed. The on-site septic tank was observed during the Site inspection. The monthly Environmental Inspections include a check of the Site compound.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
053	5.4	<u>Septic System Maintenance#</u> The on-site septic system at the Service Compound is to be maintained quarterly by an authorised service contractor. No products with bleach, ammonia or antibacterial products should be used for cleaning at the Site Office or Workshop. A Section 68c permit may be required from ULSC if changes are made to the septic system. **Frequency:** Quarterly	The on-site septic tank was observed during the Site inspection. Maintenance of the septic system was undertaken on a quarterly basis by Econocycle Services Pty Ltd. Sighted inspection records dated 23/09/2016, 28/05/2016, 23/11/2015 and 11/08/2016. There had been no reported changes to the septic system. No products with bleach, ammonia or antibacterial products were observed for cleaning at the Site Office or Workshop at the time of the Site inspection.	Compliant	-
054	5.4	<u>Minimisation of Dust Generation at the Wind Farm</u> All site traffic will be restricted to the maximum speed shown on signs at all site entries. • All load carrying vehicles entering or leaving the Site carrying loose material that may generate dust are to be covered except for unloading and loading. • Road maintenance and excavation will be scheduled to minimise dust during periods of high wind and dry conditions. Water carts will be used as necessary to keep damp working areas, spoils and stockpiles and prevent dust generation. **Frequency:** As required **Management Doc:** Site induction; Incident Register	The Environmental Induction included the following: • *"Vehicles and equipment to remain on roads and hardstands at all times* • *Do not speed* • *Drive to conditions* • *Remain on dedicated access tracks at all times* • *All load carrying vehicles to have loose material covered"* Site management reported that road maintenance and excavation would not be scheduled during periods of high winds. It was reported that when the main access road was recently regraded the contractor had a water cart on-site; however, this could not be confirmed by the auditors.	Compliant	-
055	5.4	<u>Identification of Hazardous Materials</u> Maintenance of a Hazardous Substances and Dangerous Goods Yellow Folder in the Service Compound which includes: • Material Safety Data Sheets (MSDS) for all chemical substances brought onto Site; • Site Map showing the location of hazardous materials; • Allowable storage quantities; and • A list of Personnel approved to access the hazardous materials. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; Materials Safety Data Sheets (MSDS)	Safety Data Sheets (SDS) were observed to be stored in a folder in the Site Office. Emergency information capsules located at each entrance to the Site as well as the Site Compound were observed to include maps showing the location of hazardous materials but not maximum quantities. A list of personnel approved to access the hazardous materials was not available. Two hazardous materials cabinets in the Workshop as well as the two dangerous goods containers in the Service Compound displayed the maximum storage quantities.	**Administrative Non-compliance**	**2016-OFI-13** The maximum allowable storage quantities for Hazardous Substances and Dangerous Goods as well as a list of personnel approved to access the hazardous materials should be included in the SDS folder and emergency capsules.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
056	5.4	Storage of Hazardous Materials All hazardous materials will be stored in Australian Standard storage containers according to AS 1940-2004 and in accordance with Storing and Handling liquids: Environment Protection, Participants Manual: Appendix: Technical Considerations (DECC, 2007). Wastes may accumulate in small quantities at the point of generation. Wastes are typically accumulated in 200 L (55-gallon) drums or purpose designed waste containers that are stored within a secondary containment. As waste containers are filled, they will be moved to designated hazardous waste storage areas. The chemical and hazardous waste storage areas are inspected every six months to prevent releases, explosions, and fires. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; Materials Safety Data Sheets (MSDS)	Two hazardous materials cabinets were located in the Workshop. The cabinets each displayed a maximum capacity of 250 Litres (L). Two dangerous goods containers with built in secondary containment were located in the Service Compound and displayed a maximum storage capacity of 1,500 L each (supplied by Tradecorp International Pty Ltd). Signage on the containers indicated that they complied with the requirements of AS 1940-2004. An assessment against the requirements of AS 1940-2004 was not included in the scope of works for the audit and was not conducted by the auditors. A double skinned above ground waste oil storage tank with a capacity of 4,000 L was located in the Service Compound. The back-up generator located in the Service Compound was reported to have a double skinned diesel storage tank (unknown capacity). The generator was not accessed during the Site inspection due to health and safety requirements. Twelve 200 Litre (L) steel drums were observed to be stored adjacent to the Workshop. Site management reported the drums are used to store oily rags, empty grease containers and other waste hydrocarbon material related to maintenance activities on the WTGs (i.e. on-site away from the Site Compound). The drums were stored on the gravel hard stand of the Site Compound without secondary containment (i.e. bunded pallet). The auditors observed a leaking 200 L drum at the time of the Site inspection. Site management reported that the leak had been noticed a few weeks prior to the Site inspection and that secondary containment equipment had been purchased; however, the leak had not been cleaned-up or recorded in the Incident Register. Site management reported that the leak occurred as the internal plastic bag had not been fully sealed. The leaking drum was moved to one of the bunded chemical storage containers during the Site inspection and sand was placed over the impacted gravel. It is noted that "*Spills of Hazardous Materials*" and *"Managing Hydrocarbons & Chemicals*" are included in the environmental induction. The environmental induction states *"For any incident, spill or unexpected find that occurs onsite, the following applies:* 1. *Immediate action/contain* 2. *Report* 3. *Investigate* 4. *Remedial works* 5. *Close out* " Given a 200 L drum containing oil rags was observed to be leaking at the time of the Site inspection this requirement was found to be non-compliant.	**Non-compliant** **Low Risk**	**2016-OFI-14a** Drums containing controlled wastes (i.e. oily rags) should be stored with secondary containment in a dedicated storage area. **2016-OFI-14b** Ensure that the plastic bags that are placed into the 200 L steel drums to store hazardous materials are fully sealed before sealing the drum.
057	5.4	Handling of Hazardous Materials All hazardous materials will be handled according to the appropriate MSDS within the Hazardous Substances and Dangerous Goods Yellow Folder and in accordance with Storing and Handling liquids: Environment Protection, Participants Manual: Appendix: Technical Considerations (DECC, 2007). All personnel using hazardous materials on-site must have appropriate training in the handling and use of the materials. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; Materials Safety Data Sheets (MSDS)	No specific training records for the handling of hazardous materials were available for review; however, Safe Work Method Statements (SWMS) that included handling requirements, references to SDS and relevant Personnel Protective Equipment (PPE) for hazardous materials were sighted (Mobilisation/Demobilisation SWMS, dated September 2016). Vestas sign the SWMS on a monthly basis. SDS' were observed to be stored in a folder in the Site Office. Site management reported that due to the quantities generated during the audit period no hazardous waste materials had been removed from Site.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
058	5.4	<u>Disposal of Hazardous Materials</u> Hazardous materials shall be disposed of according to the regulatory requirements and requirements of the MSDS. Licensed contractors will be used as required. See Waste Management Plan (WMP, Section 10) for further information on waste disposal. **Frequency:** Ongoing **Management Doc:** Hazardous Substances and Dangerous Goods Yellow Folder; Materials Safety Data Sheets (MSDS)	Site management reported that due to the quantities generated during the audit period no hazardous waste materials had been removed from Site. Empty hazardous material containers are disposed into plastic bags in 200 L steel drums and the drums are then sealed. The drums will be collected as required to manage the cost of disposal. Given there was no disposal of hazardous materials during the audit period this requirement was found to be not triggered.	Not Triggered	-
059	5.4	<u>Spills of Hazardous Materials</u> For major spills or releases of hazardous substances, the procedures in Appendix M – ERP must be followed. In addition: • The spill is to be contained using sandbags or earth bunds if safe to do so; • If the spilled material is a flammable liquid such as petrol the area should be covered with foam from a fire extinguisher to minimise risk of ignition; • For minor spills less than 5 litres: - the hazardous material will be cleaned up immediately using bio-absorbent material or other appropriate method; and - Waste type spill material is to be collected for disposal at an appropriate registered waste container or disposal site with details recorded; For both major and minor spills the Incident Reporting Protocol must be followed. A report of the incident will be documented showing date, nature of incident action taken (photographs if possible) with details entered into the Incident Register. **Frequency:** As required **Management Doc:** Incident Register	Site management reported that there had not been any major spills during the audit period. The Incident Register was reviewed during the Site inspection and did not include reference to a major spill or release during the audit period. The auditors observed a leaking 200 L drum at the time of the Site inspection. Refer above to item #056 for details. The leak from the oil drum observed during the Site inspection was considered to be a minor spill (i.e. less than 5 L). Given a spill/leak had occurred and had not been addressed in accordance with the requirement for a spill of less than 5 L this requirement was found to be non-compliant.	**Non-compliant** **Low Risk**	**2016-OFI-15** Refresher training for the management of leaks and/or spills should be conducted to reinforce the requirements of the Site's Incident Management System. Refer to **2016-OFI-14a** and **2016-OFI-14b**
6 FLORA AND FAUNA MANAGEMENT PLAN					
060	6.5	<u>Protection of Flora and Fauna</u> All native fauna and flora are protected, and are not to be destroyed, taken, killed, fed or unnecessarily disturbed for any reason. **Frequency:** As required **Management Doc:** Site Induction; Incident Register	Accidents involving animals are logged as "environmental accidents" within Vesta's IDB. A review of the register indicated one incident where a kangaroo was killed in a collision with a car. In addition a number of bird and bat carcasses have been found presumably caused by collisions with the wind turbines. These have not been recorded as incidents. The Site Induction includes the requirement to give way to fauna and drive to conditions. It does not specifically discuss protecting native fauna.	Compliant	**2016-OFI-16** Include the requirement to protect native fauna and flora and not destroy, take, kill, feed or unnecessarily disturb within the next revision of the Site Induction. Refer to **2016-OFI-05**

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
061	6.5	Interaction with Fauna Animals (whether native or feral) are not to be fed or approached. Dangerous animals are to be avoided, and dealt with according to safety materials provided on-site. Site personnel are not to attempt to handle or relocate a snake or other dangerous animal unless they have appropriate qualifications and/or experience. **Frequency:** As required **Management Doc:** Site Induction; Service Compound Noticeboards; Incident Register	The Site Induction includes the requirement to not handle native wildlife (alive or deceased) including snakes. It does not discuss the requirement to not feed or approach animals. It was reported there have been no incidents involving dangerous animals.	Compliant	-
062	6.5	Sightings of Sick or Injured Fauna The Site Manager is to be notified of any sightings of sick or injured fauna, including livestock. Local wildlife recovery services will be contacted regarding wildlife, the relevant landowners will be contacted regarding livestock. **Frequency:** As required **Management Doc:** Site Induction; Service Compound Noticeboards	The Site Induction includes the requirement to report deceased or injured fauna. There was one incident recorded during the audit period (on 17 June 2016) where livestock was injured in a collision with a car. In this incident Site management reported that the landowner was notified.	Compliant	-
063	6.5	Domestic Animals on-site It is prohibited for Site Staff to bring domestic animal on-site during operations. **Frequency:** As required **Management Doc:** Site Induction; Service Compound Noticeboards	The Site Induction includes the requirement that no domestic animals are permitted on-site.	Compliant	-
064	6.5	Identification of Weeds Weed identification information provided in Site Induction and on Service Compound noticeboards (see Appendix H). This information will be kept up to date using information and bulletins issued from local councils, land services and State and Commonwealth departments and specialists as required. **Frequency:** Ongoing **Management Doc:** Site Induction; Service Compound Noticeboard	The Site Induction includes discussion of weed management and includes a slide with photographs of the most common weeds in the area. Appendix 1 of the Flora and Fauna Management Plan (FFMP) includes photographs of weed species to aid in identification. These photographs have not been updated since the preparation of the FFMP. One of the weed species (Spanish Artichoke – *Cynara cardunculus*) is listed as a Class 5 weed. Class 1, 2 and Class 5 weeds are notifiable weeds. An occupier must notify the Local Control Authority (generally local Council) within 24 hours of discovering the classified weed. This requirement is not reflected in the FFMP, Site Induction or as a check within the Environmental Inspection Sheet.	Compliant	**2016-OFI-17a** Update the Flora and Fauna Management Plan and Site Induction to reflect that Class 1, 2 and 5 weeds are notifiable weeds, which require an occupier to notify the Local Control Authority within 24 hours of discovering the classified weed. **2016-OFI-17b** Consider adding a check within the Environmental Inspection Sheet for the discovery of Class 1, 2 and 5 weeds as a prompt to ensure they are notified.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
065	6.5	Determination of Weed infestation or Spread^ Monthly site inspections will be used to identify and monitor weed spread within the area disturbed by Wind Farm construction for the first 12 months of operations (post commissioning). Where weeds are identified during this period, these will be reported to the Site Manager. **Frequency:** Monthly, for the first 12 months of operations **Management Doc:** Site Inspections; Incident Register	The monthly Environmental Inspection was being used as a tool for identifying and monitoring weed spread (for example the 07/0/2016, 12/07/2016 and 06/09/2016 Environmental Inspection Sheets included notes relating to weeds). In addition a review of the he Wind Farm Environmental Inspection Issue Register indicated weeds were being identified as an issue and actions taken. For example the 3 February 2016 inspection identified lots of weeds across the site. The action column noted that Taralga Rural Pty Ltd sprayed most weeds on the 21 May 2016 with the exception of two landowners that requested their properties weren't sprayed.	Compliant	-
066	6.5	Response to Weed Infestation or Spread A prompt response to weed spread within the area disturbed during Wind Farm construction is required during the first 12 months of operations (post commissioning). This will include but not be limited to implementation of weed spraying and monitoring of the infestation or spread Any contractor undertaking weed spraying must adhere to the Pesticides Act 1999. **Frequency:** Ongoing, for the first 12 months of operations **Management Doc:** Incident Register; Job Reports	The Environmental Inspection Issue Register indicated weeds were sprayed by Taralga Rural Pty Ltd in November 2015 and May 2016. It is noted that: • One landowner requested weed spraying not be conducted in the vicinity of their crop; and • One landowner requested the Site supply the weed spray and that the landowner conduct the spraying themselves. Site management reported that they agreed to both landowner requests. During the Site inspection weeds were observed on land adjacent to the crop the landowner requested be protected from spraying. In general, weed management across the site appeared effective. Weeds were observed on the lands of the two landowners where spraying was not undertaken as noted above. It is considered that the Environmental Inspection is a good tool to monitor the presence of weeds and to confirm that the landowner (once provided with the pesticide) does undertake the spraying.	Compliant	(refer **2016-OFI-10**)
067	6.5	Importing of Quarry Materials Materials imported from quarries are to be certified as weed free. **Frequency:** As required **Management Doc:** Site Induction	Road maintenance was recently undertaken on the main access road from Bannaby Road to the Site compound by contractor's Divall's Earthmoving and Bulk Haulage Pty Ltd. Sighted a quotation for the works dated 7 September 2016. A letter from Divall's Earthmoving and Bulk Haulage Pty Ltd to the Site dated 7 October 2016 stated "*the Road Base that has been supplied to your project from our Carrick Quarry. The prepared material is crushed Road Base that is manufactured from Virgin Excavated Natural Material (VENM) and weed free"*.	Compliant	-
068	6.5	Machinery Brought on to Site to be Weed and Pathogen Free Job supervisor to ensure machinery is cleaned prior to entry to the Wind Farm. Any machinery to be used off the road and hardstand network must be inspected and if not clean, not allowed on site. A WMS is required for any vehicular access in these areas (see control Access off Site roads and hardstands prohibited). **Frequency:** As required **Management Doc:** WMS; Site Induction	The Site Induction discusses the requirement that any machinery to be used off roads and hardstands must be inspected by a Wind Farm representative before and after jobs. The Induction also stated that all vehicles / equipment arriving on-site must be clean and weed free and that vehicles are to stay on roads and hardstands to reduce the risk of spreading weeds.	Compliant	-
7 LANDSCAPE AND REHABILITATION MANAGEMENT PLAN					
069	7.4	Consultation with Residents Within 2km of the Wind Farm Consultation has occurred and will continue to occur as per Condition 32. **Frequency:** Up to 6 months into operations, post commissioning	Individual Landscape Plans for affected residents were observed to have been signed on the following dates: 17/02/2015, 18/09/2015, 11/11/2015, 12/11/2015, 23/11/2015, 27/01/2016 and 28/07/2016. Site management reported that residents within a 2 km radius were contacted via letters, email telephone or door knocks concerning the Visual Impact Mitigation Reports (VIMRs). A register of affected residents was available for review (Ref: TAR_Landscape_Residents.Xlsx). The register included a unique house identification number as well as a record of when the resident was contacted. GPS coordinates of each residence was included in the register.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
070	7.4	<u>Commission a Qualified Landscape Professional to Prepare A VIMR</u> For eligible landscaping applications, a qualified landscape professional will be commissioned (and his/her appointment approved by the Secretary) to investigate reasonable and feasible measures to minimise the visual impacts of the development on the landowner's property using landscape measures. These measures are to be summarised in a Visual Impact Mitigation Report (VIMR) for that property. **Frequency:** Commissioned within 14 days of an eligible request	The appointment by the Secretary of a qualified landscape professional could not be demonstrated. Individual Landscape Plans indicated that they had been prepared by Fresh Landscape Design Pty Ltd. A search of the Fresh Landscape Design Pty Ltd website indicated that the company has won landscape design awards from the Australian Institute of Landscape Design and Manager (AILDM). Fresh Landscape Design Pty Ltd was also included in the AILDM online landscape designer register. Individual Landscape Plans for affected residents were observed to have been signed on the following dates: 17/02/2015, 18/09/2015, 11/11/2015, 12/11/2015, 23/11/2015, 27/01/2016, 28/07/2016. Upon completion of the works Landowners signed Landscaping and Visual Screening Program Works and Maintenance Agreement (completion notice). Site management reported that landowners were happy with the works and outcome. The Complaints Register dated 1 May 2015 to 15 September 2016 did not include any complaints related to VIMRs. One complaint was received on the 22.06.15 regarding visual impacts (amongst other issues). This resident was within 2 km of a turbine and eligible for a VIMR. The site assessment was reportedly completed on the 14.08.15 and no further complaints raised. Whilst it appears that a qualified landscape professional prepared the individual landscape design plans the appointment of the landscape professional by the Secretary could not be demonstrated. Given landscape design and management was a critical element of the Project this condition was found to be an administrative non-compliance.	**Administrative Non-compliance**	-
071	7.4	<u>Provide VIMR to Applicant</u> Provide a copy of the VIMR to the applicant within 14 days of the Site Manager receiving the report **Frequency:** Within 14 days of receiving report	Landscaping and Visual Screening Program Works and Maintenance Agreement dated 27 November 2015, 6 October 2016 and 16 August 2016 were sighted. An Individual landscape Plan dated 28 July 2016 was sighted for a residence on Barrett's Road. An Individual landscape Plan dated 18 September 2015 was sighted for a residence on Bannaby Road. It was not possible to confirm the VIMR had been supplied to the applicants within 14 days of the Site Manager receiving the report; however, generally it appeared that affected residencies had received a VIMR and that residents had agreed to the plan.	Compliant	-
072	7.4	<u>Approval of VIMR</u> If the applicant provides written agreement to the measures outlined in the VIMR, a copy of the VIMR is to be forwarded to the Secretary for approval within one month of agreement. If the applicant and TWF do not agree to the measures after consultation, either party may refer the matter to the Secretary. **Frequency:** Within 1 month of agreement	A letter dated 13 April 2016 from the Secretary to TWF concerning submission by the Site of the Visual Impact Mitigation Proposals on 9 March 2016. The letter stated that "*The Department has reviewed the proposals, is generally satisfied with their form and content, and considers that they meet the requirements of the relevant conditions of consent for the Taralga Wind Farm. The Secretary has approved the proposals".* A letter was sighted dated 18 September 2016 between one resident and the Wind Farm confirming that the Wind Farm will pay an amount in-lieu of the Wind Farm carrying out agreed landscaping.	Compliant	-
073	7.4	<u>VIMR Implementation</u> Following approval of the VIMR, the measures identified are to be implemented within three months of approval. **Frequency:** Within 3 months of VIMR approval	Site management reported that landscape works were being conducted by July 2016 and that one resident required additional planting after three months; however, timeframes were not formally managed and may not have been met in some cases. The Complaints Register dated 1 May 2015 to 15 September 2016 did not include any VIMR complaints or issues.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
8 HERITAGE MANAGEMENT PLAN					
074	8.4	Road Maintenance Near TWF OS4 The access road on either side of the watercourse near TWF 0S4 was built upon a geotextile base to avoid stripping of the ground for 100 m on either side of the watercourse and protect any potential archaeological artefacts (see Site Plan in Appendix A). Any road maintenance during operations should consider the special design of this section of road and continue to avoid stripping of the ground in this area. **Frequency:** As required	Site management reported that no road maintenance has been conducted near TWF 0S4 (close to WTG56 and WTG58) during operation of the wind farm. The area was observed during the Site inspection and there did not appear to have been any recent maintenance activities. It is noted that a section of the road to TWF0S4 is a public road.	Not Triggered	-
075	8.4	Staff training All Site Staff made aware of the unexpected finds procedure and also made aware of the known archaeological sites mapped on the Site Plan in Appendix A. **Frequency:** As required **Management Doc:** Site Induction	The environmental induction states *"For any incident, spill or unexpected find that occurs onsite, the following applies:* 1. *Immediate action/contain* 2. *Report* 3. *Investigate* 4. *Remedial works* 5. *Close out* " The Environmental Site induction notes that damage should be prevented at known sensitive areas (heritage and flora and fauna) but did not include reference to the location of the site(s). A 'Heritage Zone' is known to exist to the north of WTG49 as shown on the Site plan in Appendix A (22 June, DWG No.: 1542).	Compliant	**2016-OFI-18** Update the Site induction to include graphical reference to known archaeological / heritage sites.
076	8.4	Unexpected Finds Procedure In the event of an unexpected discovery of an aboriginal heritage item, work must cease and the Site Manager informed immediately. The Site Manager must follow the procedure outlined in the CHMP (Appendix J). **Frequency:** As required **Management Doc:** Incident Register	Site management reported that no unexpected discovery of an aboriginal heritage item has occurred during the operation of the Wind Farm. The Incident Register did not include any reference to the unexpected discovery of an aboriginal heritage item.	Not Triggered	-

<table>
<tr><th>Audit Ref #</th><th>OEMP Reference</th><th>Requirement</th><th>Comments / Evidence Sighted / Key Findings</th><th>Compliance Status</th><th>Opportunity for Improvement</th></tr>
<tr><td colspan="6">9 TRAFFIC MANAGEMENT PLAN</td></tr>
<tr><td>077</td><td>9.2.1</td><td><u>Traffic Volume</u>

The following vehicles are expected to be travelling to and from the Wind Farm during the operational phase:

<table><tr><th>Vehicle Type</th><th>Number of Movements</th></tr><tr><td>Light vehicle</td><td>38/week</td></tr><tr><td>Delivery truck (semi-trailer / tray back)</td><td>2/week</td></tr><tr><td>Franna crane</td><td>1/quarter</td></tr><tr><td>Hydraulic boom crane</td><td>1/year (with 2 escort trucks)</td></tr><tr><td>Lattice boom crane</td><td>1/year (with 15-20 truck movements)</td></tr><tr><td>Garbage truck</td><td>3/month</td></tr><tr><td>Certified waste truck</td><td>1/quarter</td></tr></table></td><td>Site management reported that traffic data is not recorded by the Wind Farm but was able to confirm that the predictions stated Section 9.2.1 of the OEMP were generally accurate:

<table><tr><th>Vehicle Type</th><th>Number of Movements</th><th>Estimated Within Audit Period Note 1</th></tr><tr><td>Light vehicle</td><td>38/week</td><td>Accurate</td></tr><tr><td>Delivery truck (semi-trailer / tray back)</td><td>2/week</td><td>Accurate</td></tr><tr><td>Franna crane</td><td>1/quarter</td><td>2015/2016 = 1</td></tr><tr><td>Hydraulic boom crane</td><td>1/year (with 2 escort trucks)</td><td>2015 = 1
2016 = 1</td></tr><tr><td>Lattice boom crane</td><td>1/year (with 15-20 truck movements)</td><td>0</td></tr><tr><td>Garbage truck</td><td>3/month</td><td>Less than 3/month</td></tr><tr><td>Certified waste truck</td><td>1/quarter</td><td>0</td></tr></table>
Note 1 = As reported by Site management.

During the Site inspection CWP and Vesta personnel were observed to access the Site by light truck or car. No heavy vehicles were observed on-site during the Site inspection. Monitoring of traffic is not considered to be warranted given the low volume of vehicles during the operational phase of the Project. Confirmation of traffic movements can be verified in the future through purchase orders and waste tracking documents.</td><td>Compliant</td><td>-</td></tr>
<tr><td>078</td><td>9.2.2</td><td><u>Oversize / Overmass Vehicles</u>

In the event of major repairs requiring the replacement of a WTG blade, hub, tower or nacelle, it will be necessary for oversized/overmass vehicles to access the Wind Farm and these vehicles will require a permit from Roads and Maritime Services (RMS).

Oversize/overmass vehicles will be used on rare occasions and only for unscheduled maintenance of WTGs.</td><td>Site management reported that the replacement of a gearbox for one WTG during the audit period required an RMS oversize permit.

The following documents were sighted:

• Roads and Maritime Services IAP Mobile Crane Mass or Dimension Exemption (Permit), Permit No.: 333946, Valid: 30 September 2015 to 29 September 2016.
• Roads and Maritime Services IAP Mobile Crane Mass or Dimension Exemption (Permit), Permit No.: 313094, Valid: 30 September 2014 to 29 September 2015.
• Plant Pre-Acceptance Checklist, dated 12 September 2016 – 400 Tonne crane.

No oversize/overmass vehicles were observed on-site during the Site inspection.</td><td>Compliant</td><td>-</td></tr>
<tr><td>079</td><td>9.2.3</td><td><u>Site Access Times</u>

Site personnel will require access to the Wind Farm 24 hours a day, seven days a week. However, vehicle movements will generally be limited to the following times:

• Service related vehicles:
- Monday to Friday – 6.30 am to 6.00 pm
- Saturday – 7.30 am to 1.30 pm
- Seven days a week – out of hour’s callouts as required.
• Delivery trucks: Monday to Friday – 7.00 am to 5.00 pm.
• Cranes: Seven days a week – 7.00 am to 5.00 pm.</td><td>Site management reported that access to the Site was generally conducted within the times specified in Section 9.2.3 of the OEMP.

A review of the Complaints and Enquires Register dated 1 May 2015 to 15 September 2016 did not include any traffic related complaints concerning access times.</td><td>Compliant</td><td>-</td></tr>
</table>

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
080	9.2.4	Public Road Usage Light vehicles will typically come from both Taralga and Goulburn while delivery trucks will typically come from Goulburn. Local roads that will be used for access include Bannaby Road, Old Showground Road and Alders and Crees Road and are shown on the Site Plan.	During the Site inspection it was noted that access to the Site was via either Bannaby Road, Old Showground Road or Alders and Crees Road, and that there were no other local roads with access to the Site.	Compliant	-
081	9.2.4	All large construction vehicles associated with the development must utilise the transport routes identified in Figure 5.16 of the EIS or Figure 2 of the Modification 6 application. Both of these figures are reproduced in Appendix K. Note that there is no access to the Wind Farm from Hillcrest Road, directly to the south of the Wind Farm, as shown in Figure 5.16 (this access relates to a previous Wind Farm design).	Confirmed by crane operator as route taken. A review of the Complaints and Enquiries Register dated 1 May 2015 to 15 September 2016 did not include any traffic related complaints concerning large vehicle routes.	Compliant	-
082	9.2.4	All oversize heavy construction vehicles shall only use the route identified in Figure 2 of Modification 6 (Appendix K).	A review of the Complaints and Enquiries Register dated 1 May 2015 to 15 September 2016 did not include any traffic related complaints concerning large vehicle routes.	Compliant	-
083	9.2.5	Wind Farm Access Points Permanent access points for the Wind Farm are shown on the Site Plan in Appendix A and listed in the table below: • EP2: End of Old Showground Road • EP3: Bannaby Rd, 4.7 km from Taralga • EP4: Bannaby Rd, 5.4 km from Taralga • EP5: Bannaby Rd, 6.8 km from Taralga	The auditors sighted EP2, EP3, EP4 and EP5 during the Site inspection	Compliant	-
084	9.4	Drivers Code of Conduct The Driver's Code of Conduct will require drivers to comply with the following: • Obey all laws, rules and regulations that apply to vehicle use on public roads and private access roads (including the site speed limit advertised at each site entrance). • Respect the rights of all road users, including pedestrians and cyclists, to share the road. • Ensure vehicles are roadworthy, in good mechanical condition and clean. • Follow designated access routes and avoid restricted access roads unless explicitly permitted to do so. • Heavy vehicles are not to travel in convoy. • Minimise dust generation on access roads and hardstand areas as far as is reasonable and practicable. • Minimise noise by limiting the use of engine braking and other noisy driving practices in built up areas. • Stay within wind farm access roads throughout the site. The Driver's Code of Conduct will be covered during the Site Induction. **Frequency:** Ongoing **Management Doc:** Site Induction	The Environmental Induction included the following: • *"Vehicles and equipment to remain on roads and hardstands at all times* • *Do not speed* • *Drive to conditions* • *Remain on dedicated access tracks at all times* • *All load carrying vehicles to have loose material covered"* The Vestas Contractor Induction included four pages concerning traffic management at the Site. Travel on public roads is addressed under specific traffic management plans and RMS permit(s).	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
085	9.4	Competence Training And Awareness During the Site Induction, all Site Staff will be made aware of the: • Driver's Code of Conduct; • Operating hours for all vehicles; • Approved routes for Site access; • Speed limits on public roads near the Wind Farm; • Incident response and reporting procedures in the event of a traffic accident or near miss; • Expectations of behaviour when travelling on public roads; and • Contact phone number in the event of a complaint. **Frequency:** Ongoing **Management Doc:** Verification of Competency & Training Register; Site Induction	The Environmental Induction and the Vesta Contractor Induction included: • Driver's Code of Conduct; • Operating hours for all vehicles; • Approved routes for Site access; • Speed limits on public roads near the Wind Farm; • Incident response and reporting procedures in the event of a traffic accident or near miss; • Expectations of behaviour when travelling on public roads; and • Contact phone number in the event of a complaint.	Complaint	-
086	9.4	Complaints and Incident Reporting Complaints from the public and traffic incidents (including near misses) will be investigated by the Site Manager or Site Supervisor. Investigations will consider: • Circumstances at the time of the incident; • Cause of the incident; • Contributing factors to the incident; and • Whether appropriate controls were in place and implemented to prevent the incident. Corrective actions may be prescribed as a result of the investigation in accordance with Section 4.11 of the OEMP. **Frequency:** Ongoing **Management Doc:** Complaints Register, Incident Register, Corrective Action Requests	A review of the Complaints and Enquiries Register dated 1 May 2015 to 15 September 2016 did not include any public related traffic complaints. The Incident Register contained two traffic related incidents. Both incidents occurred in June 2016 and involved collisions with animals. The first incident (Ref: 215073209) occurred on 30 June 2016 and concerned a collision with a kangaroo on a public road as an employee was driving to work. The second incident (Ref: 214107385) occurred on 17 June 2016 and involved a collision with livestock on Track 1 between the batch plant and WTG48. Both incidents were observed to have recorded in the Vestas IDB system which was noted to include details of the incident as well as corrective actions.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
087	9.4	<u>Oversize / Overmass Vehicles</u> The Site Supervisor will ensure the transport contractor has the relevant oversized/overmass permit and all other approvals required. To obtain the permit the transport contractor will be required to complete a specific Transport Management Plan providing detail on the transport route and timing of vehicle movements. Oversize/overmass vehicle movements will be: • Scheduled to avoid conflict with school bus operations; • Minimised during peak hours; Consultation will be required with the RMS, Police, ULSC, GMSC and any other relevant authority. Local residents, emergency services, schools and school bus companies will be notified of oversize/overmass operations prior to transport commencing. **Frequency:** As required **Management Doc:** RMS Transport Management Plan	Site management reported that the replacement of a gearbox for one WTG during the audit period required an RMS oversize permit. The following documents were sighted: • Roads and Maritime Services IAP Mobile Crane Mass or Dimension Exemption (Permit), Permit No.: 333946, Valid: 30 September 2015 to 29 September 2016. • Roads and Maritime Services IAP Mobile Crane Mass or Dimension Exemption (Permit), Permit No.: 313094, Valid: 30 September 2014 to 29 September 2015. • Plant Pre-Acceptance Checklist, dated 12 September 2016 – 400 Tonne crane. The Traffic Management Plan for the gear box replacement works was not observed however the following measures were reportedly implemented: • Delivery of the gearbox and the crane movement was made overnight with the oversize vehicles onsite prior to 8am in the morning • The return of both defect gearbox and the oversize vehicles was done on a Saturday to avoid school traffic • Traffic during the replacement of the gearbox was controlled by the Person in Charge of the permit to work • Signage was erected adjacent to the turbine having the replacement done • A traffic controller was present to control traffic in and out of the work site • A radio kept was also located at the worksite as a back-up in case the traffic controller was not able to man the checkpoint so any visitors were able to contact the Person in Charge. • No traffic was allowed to enter/exit/pass through the site while any high risk or lifting tasks were being undertaken. No oversize/overmass vehicles were observed on-site during the Site inspection.	Compliant	
088	9.4	<u>Road Safety Changes</u> A Road Safety Report will be produced after 12 months of operation to identify any road safety changes required along Taralga Road, Bannaby Road, Old Showground Road, and Alders and Creek Road. The report will be compiled in consultation with the RMS and ULSC and must include, but not be limited to, any significant change to motor vehicle accident rates through the comparison of crash data (where available) and analysis of recorded incidents. Reasonable and feasible mitigation measures must be implemented as required by the RMS and ULSC to address the road safety impacts that can be attributed to the Wind Farm. **Frequency:** 12 months after commencement of operation **Management Doc:** Road Safety Report	Site management reported that a Road Safety Report had not been prepared to identify any road safety changes required along Taralga Road, Bannaby Road, Old Showground Road, and Alders and Crees Road. Site management reported that they were not aware of any significant change to motor vehicle accident rates through the comparison of crash data (where available) and analysis of recorded incidents during the operation of the Wind Farm.	**Administrative Non-compliance**	**2016-OFI-19** Prepare a Road Safety Report in consultation with RMS and ULSC.

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
10 WASTE MANAGEMENT PLAN					
089	10.4	<u>Minimise Generation of Waste</u> All waste shall be reduced to the minimum extent that is reasonable and practical **Frequency:** Ongoing	Minimal waste is removed from Site due to the low quantities generated. Where possible the Site minimises waste. Spare parts pallets with fold up boxing are re-used where possible. At the onset of the audit, Vestas reported that it believed general waste was being separated into recyclables and non-recyclables at the Goulburn Management Centre. Vestas was asked to confirm this as part of the audit process and it was discovered this was not the case. As a result Vestas reportedly organised to have four separate bins delivered to site for wood, metal, general waste and cardboard. The delivery and use of these bins for waste segregation was not verified. Waste oil and oily rags were separated and disposed of on an as needed basis.	Not verified	-
090	10.4	<u>Externally Generated Waste</u> No waste generated outside of the Wind Farm is to be brought onto Site **Frequency:** Ongoing	Site management reported that no externally generated waste has been brought onto Site during the audit period. No externally generated waste was observed during the Site inspection.	Compliant	-
091	10.4	<u>Waste Collection On-site</u> Provision of appropriate domestic and industrial waste collection facilities within the Service Compound to permit appropriate segregation, storage and disposal of waste. These should include rubbish bins, recycling bins, cigarette bins, toilet facilities and designated storage areas for controlled waste. Waste must be classified in accordance with Waste Classification Guidelines Part 1: Classifying Waste (DECC, 2008). All waste receptacles should be properly labelled and all outdoor receptacles covered. All waste hazardous materials will be stored and handled using the measures outlined in the SWMP (Section 5). **Frequency:** Ongoing	One large and one small general waste bin were observed to be located next to the Workshop in the Service Compound. The small bin was covered; however, the larger bin was uncovered at the time of the Site inspection and neither bin was labelled as general waste receptacles. Twelve 200 Litre (L) steel drums were observed to be stored adjacent to the Workshop. Site management reported the drums are used to stored oily rags, empty grease containers and other waste hydrocarbon related to maintenance activities on the WTGs (i.e. on-site away from the Site Compound). It is noted that "*Spills of Hazardous Materials*" and *"Managing Hydrocarbons & Chemicals*" are included in the environmental induction. The environmental induction states *"For any incident, spill or unexpected find that occurs onsite, the following applies:* 1. *Immediate action/contain* 2. *Report* 3. *Investigate* 4. *Remedial works* 5. *Close out* " Waste oil was disposed of in a dedicated 4,000 L double skinned Aboveground Storage Tank (AST) located in the Service Compound. The waste drums were not labelled but had secure lids. A number of the drums were empty. Controlled waste was observed to be placed into a durable plastic bag and then into the drums. Site management reported that no controlled waste (i.e. oily rags, waste oil, chemical waste) had been disposed during the audit period due to the low quantity of waste generated. A cigarette butt container was observed at the entrance to the Site Office.	**Non-compliant** **Low Risk**	**2016-OFI-20** Ensure waste receptacles within the Site Compound are labelled and covered.
092	10.4	<u>Waste Generated On-site, Away From the Service Compound</u> All waste generated by maintenance activities on-site but away from the Service Compound is to be collected and disposed of appropriately at the Service Compound. **Frequency:** Ongoing			
093	10.4	<u>Disposal of Oils, Greases, Coolants, Paints or Other Chemical Liquids</u> Ensure no wash-out of chemicals into the on-site septic system. This will be reinforced using noticeboard information. These liquids should be stored in designated and labelled chemical storage containers, and disposed of by a licensed contractor (see below) as per the (MSDS) for that material.	The on-site septic system was observed to be located adjacent to the Site Office in the Site Compound. It was reported that chemicals were not washed out into the septic system. The Site Induction included the requirement to take care of the septic system and not wash out chemicals into it. Two flammable goods cabinets, each with a capacity of 250 L, were observed in the Workshop to contain chemicals used on-site. Site management reported that no controlled waste (i.e. oily rags, waste oil, chemical waste) had been disposed during the audit period due to the quantity of waste generated.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
094	10.4	Waste Removal from Site Engage a licensed contractor for the regular disposal of: • General waste; • Recyclable materials; and • Controlled waste (e.g. fuel, solvents, oils, contaminated waste and other chemicals). **Frequency:** As required	Site management reported that the local contractor (Tutt Bryant Hire Pty Ltd) does not recycle and that general waste is taken to the Goulburn Waste Management Centre. An Environmental Protection Licence (EPL) for Tutt Bryant Hire Pty Ltd was not available on the NSW Environmental Protection Authority (EPA) Protection of the Environment Public Register. Site management reported that no controlled waste (i.e. oily rags, waste oil, chemical waste) had been disposed during the audit period due to the quantity of waste generated.	**Non-compliant** **Low risk**	**2016-OFI-21** Confirm if the waste contractor is licensed to dispose of waste generated at the Site (i.e. general waste).
095	10.4	Cleaning Service Employ a cleaning service to regularly clean the Site Office within the Service Compound. This will include the emptying of rubbish and recycling bins within the Site Office. **Frequency:** As required	A representative from the contracted cleaning company was observed cleaning the Site Office during the Site inspection.	Compliant	-
096	10.4	Site Inspections Conduct regular inspections of the site and waste management facilities to ensure a high level of housekeeping standards are maintained. **Frequency:** Monthly **Management Doc:** Environmental Site Inspection	Site management reported that Site inspections include a check of waste storage. The following inspection records were sighted: 07/06/2016, 12/07/2016, 14/07/2016, 26/07/2016, 06/09/2016 and 09/09/2016. It is noted that the Environmental Inspection Sheet (Rev A- 26 Aug 2015) included categories for "*waste, oil containment, hazmat chem storage and other*" in the Sheet for the Substation, Site Office and Workshop.	Compliant	
097	10.4	Waste Records Maintain prescribed waste disposal records, including details of the waste contractor. **Frequency:** Ongoing	Vestas provide CWP with a monthly report which includes waste volumes removed. A CWP Monthly Report to the Wind Farm owners includes quantities of General waste, waste oils, Waste coolant and Fluorescent tubes disposed (maintained in an excel register). General waste tax invoices for Tutt Byrant Hire Pty Ltd including, but not limited to; 30/09/2016, 31/08/2016, 31/07/2016, 31/10/2015, 30/11/2015 and 31/12/2015 were observed. EFTPOS receipts for Goulburn Waste Management Centre were sighted.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
11 ELECTROMAGNETIC INFERENCE PLAN					
098	11.4	Receiver Upgrade Until a TV re-transmitter is installed at the Wind Farm, all residents living within the blue predicted interference zone shown in Figure 2 are eligible for an installation of the free-to-air satellite service known as VAST (Viewer Access Satellite Television). For those residents living outside of the predicted interference zone who believe they are experiencing television interference caused by the Wind Farm, a communications technician may be commissioned to perform signal testing. Where Wind Farm interference is found, the antenna system may be upgraded or a VAST system installed to rectify the reception. **Frequency:** As required **Management Doc:** Complaints Register	The Asset Manager reported that CWP conducted door knocking on residencies in Taralga to offer the VAST units. Spare VAST units were observed in the Site office. Sighted an invoice from the CWP contractor for the purchase of some VAST units. Greigs Electronic Services Pty Ltd (ABN: 68 003 939 900) is contracted to address any television related issues. A Community Newsletter directed people told to contact TV specialist contractor (Greigs Electronics) directly to re-configure TV after TV transmitter installed. The Complaints and Enquires Register dated 1 May 2015 to 15 September 2016 was observed to include TV related complaints concerning loss of signal or interference. The Complaints Register included a 'Detailed Response/Action' summary and a 'Closed' column. TV signal related issues in the Complaints Register at the time of the Site inspection generally appeared to have been closed-out.	Compliant	-
099	11.4	Television Re-transmitter A digital television re-transmitter to be installed on-site to provide an alternate service for the local area and rectify the interference caused to the Knights Hill broadcast. **Frequency:** Commissioned in 2015	The digital television re-transmitter was observed during the Site inspection and was commissioned in November 2015. Site management reported that some residents still have VAST units as back-up to the re-transmitter.	Compliant	-
100	11.4	Television Re-transmitter Operation and Maintenance The television re-transmitter will be operated and maintained for the life of the Wind Farm. It will be monitored remotely and serviced annually by the equipment supplier. The re-transmitter will be fitted with an uninterruptable power supply (UPS) to minimise the likelihood of it being affected by a power blackout. **Frequency:** Annual Maintenance **Management Doc:** Incident Register	The re-transmitter was not inspected during the Site inspection; however, photographic evidence of the equipment was provided and was observed to include an uninterruptable power supply. Site management reported that Satellite, Television and Radio Australia Pty Ltd (ABN: 85 151 797 009) (STRA) were due to attend Site on 14 November 2016 to conduct the annual maintenance inspection of the re-transmitter. Sighted maintenance contact to annual maintenance and ongoing remote monitoring with STRA.	Compliant	-
Appendix I BIRD AND BAT ADAPTIVE MANAGEMENT PLAN					
101	Table 11 Procedure 6	Monitoring and Reporting Calculating annual mortality of birds and bats per turbine based on post-operational repetition of monitoring activities (monthly pulsed carcass searches). Annual mortality estimates should include correction factors from scavenger and searcher efficiency trials (twice / year). Post-construction mortality surveys undertaken for at least two years and up to five years.	Monthly bird and bat monitoring was undertaken by specialist consultants Brett Lane and Associates Pty Ltd (BL&A). The auditors sighted examples of the monthly reports and reviewed the September 2016 monthly report. The first annual report (Bird and Bat Adaptive Management Program Report of Year One Implementation – Annual Report 2015-2016) included annual mortality estimates and included correction factors from the scavenger and searcher efficiency trials. The scavenger trail was undertaken from the 4 to 21 April 2016. The first searcher efficiency trial was undertaken in April 2016 and the second spring trial was scheduled to take place in November 2016.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
102	Table 11 Procedure 6	Annual reports prepared within 3 monthly of yearly monitoring. The second post-commissioning annual report will include an evaluation of the adaptive management program. This report will be provided to the Secretary within three months of the annual deadline and include a recommendation on the continuation of monitoring and management activities, including monitoring and management measures that have been completed and/or for which continuation is not warranted based on an informed risk assessment.	The second post-commissioning annual report is due in 2017.	Not Triggered	-
103	Table 11 Procedure 6	Protocol for Handling and Reporting Fatalities and Injured Wildlife It will be necessary for the wind farm operator to obtain from the Office of Environment and Heritage a permit under the state National Parks and Wildlife Act 1974 to handle and keep native wildlife (even dead wildlife) as part of the monitoring program.	The Wind Farm maintains a General Licence (MWL000102690) from OEH for the possession of bird and bat carcasses. The Licence expired on the 31 October 2016 and was renewed on the date of the first day of the Site inspection (1 November 2016).	Compliant	-
104	Table 11 Procedure 6	The Office of Environment and Heritage regional office will be provided with a copy of the completed carcass search data-sheet for recorded carcasses within seven days of it being found	The Monthly Bird and Bat Monitoring reports prepared by BL&A include details of any carcasses found during the monitoring event. For example the September 2016 monitoring report included a completed "Taralga Wind Farm Bird/Bat Strike/Nesting Report Form' which includes similar information as the data-sheet included in the BBAMP. The monthly monitoring reports were reportedly provided to the Office of Environment and Heritage (OEH). Where carcasses are found by Wind Farm staff outside of monitoring events, the OEH is notified via email (sighted example of email notification to OEH dated 7 October 2016 for carcasses found on 6 October 2016 including photos). It was noted that some environmental incidents were not being recorded in the IDB. For example bird and/or bat strikes. It is considered that these should be logged as environmental incidents within the IDB to ensure incidents are reflected and to facilitate formal close out of actions (in particular where sub-contractors are responsible for completing remedial works). This would also have the benefit of ensuring all the accompanying information such as evidence of OEH notification, tracking any follow up actions required by OEH, payment to WIRES etc. is logged.	Compliant	Refer to **2016-OFI-05**
105	Table 11 Procedure 6	All records of Wedge-tailed Eagle collision will be recorded separately to ensure that the appropriate compensation fee is paid to WIRES (as per condition 92 and 93[e]). Records of payment will also be recorded and reported within the annual report to the Secretary.	Six Wedge-tailed eagle collisions had been recorded at the time of the Site inspection. The first Annual Report 2015 - 2016 reported on four Wedge-tailed eagle deaths and stated that on each occasion a payment had been made to WIRES. For two Wedge-tailed eagle deaths recorded post annual report the auditors sighted the receipts of payments to WIRES dated 8 August 2016 and 18 October 2016.	Compliant	-
106	3.5	Prey Management Designate a suitable local person to perform the function of Carrion Removal Coordinator	Carrion removal is undertaken by the Asset Manager	Compliant	-
107	Table 11 Procedure 7	Stock and kangaroo carcasses will be removed from within 300m of wind turbines on a monthly basis and buried immediately at a designated location. Activity recorded in management log book.	It was reported that there has been stock or kangaroo carcasses within 300 m of wind turbine and that in these instances the landowner is alerted to remove the animal or carcass. The Asset Manager records these findings on the Environmental Inspection Sheet.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
108	Table 11 Procedure 7	Restrict lambing to paddocks at least 500m from turbines.	Site management reported that this measure was not feasible to implement as it would require significant fencing to be erected around each WTG and may make certain paddocks not usable due to the restricted area. Site management also indicated that implementation of this requirement is unlikely to be supported by the local landowner. It is noted that the six Wedge-tailed eagle collisions occurred in areas of the Site where lambing had not occurred but where cattle were grazing. Site management were therefore unable to justify the installation of fencing given lambing did not appear to be attracting birdlife. An email from Site management to the Office of Environment and Heritage (OEH) dated 7 October 2016 (12:32am) notes that cattle were present in the paddock when a Wedge-tailed eagle carcass was found on 6 October 2016. OEH specifically asked if lambing may have attracted the bird in their email to site dated 7 October (09:46am). It is noted this requirement was not a mitigation measure proposed in the EIS or specified by a Condition of Consent. Given this, it is recommended that it is removed from the next revision of the BBAMP.	**Non-compliant** Low risk	**2016-OFI-22** Consideration should be given to removing requirement from next revision of BBAMP
109	Table 11 Procedure 7	Implement an integrated rabbit control program if the carrion removal program suggests rabbit carcasses are an issue	No rabbit carcasses had been identified at the time of the Site inspection.	Not Triggered	-
110	3.6	<u>Significant Impact Triggers</u> Upon identification of a significant impact trigger (4 carcasses in two successive searches at the one turbine and/or a threatened or listed migratory species found dead under a wind turbine during any mortality search) notify Project Manager who will notify OEH Implement the Operational Procedure outlined in Figure 6.	The Significant Impact Trigger was reported to have been triggered once during the audit period due to discovery of feather spot of a Gang-gang Cockatoo near WTG33 on the 30 September 2015. An Incident Report and Action Plan was prepared and provided to the OEH (BL&A, 30 October 2015). The Incident Report proposed an immediate investigation to assess the most effective mitigation and seek to understand the cause of the fatality. The investigation focused on Gang-gang cockatoo population estimates, food sources, breeding habitat and risk behaviours in and around the Taralga Wind Farm. A report was prepared [Gang-gang Cockatoo Assessment (BL&A, October 2015, Report No. 8129)] presenting the findings of the assessment and recommending that ongoing targeted monthly Gang-gang cockatoo transect survey be undertaken, carcass searches supplemented by additional single searches within the eastern forested area of WTG29 and WTG31 for a period of 12 months and mapping of nests from October to January. The OEH provided a response to the assessment report on the 28.10.15 (not sighted) to which BL&A responded by letter dated 30.10.15 (sighted). The response letter confirmed the additional monitoring requirements to enable more accurate advice on future mitigation measures. No further correspondence was received regarding this incident. No other Gang-gang cockatoo fatalities have been recorded since. The first Annual Report 2015-2016 stated that a separate report on the findings of the Gang-gang cockatoo targeted surveys would be prepared in October 2016. This had not been completed at the time of the audit site inspection in early November 2016. It is noted this was not logged as an internal incident in the Taralga Wind Farm incident management system. Refer also to #023.	Compliant	Refer **2016-OFI-05**
111	3.6.3 & Table 10	<u>Supplementary measures</u> Supplementary mitigation measures will be implemented in the event that a significant impact trigger is recorded. Examples included those detailed in Table 10 of the BBAMP	Refer to Significant Impact Triggers.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
Appendix L NOISE MANAGEMENT PLAN					
112	4.0	Noise Compliance Testing Taralga Wind Farm will engage an independent acoustic consultant, approved by the DPE, within six months of the commencement of operation (at the completion of commissioning) to undertake Initial Compliance Testing, as per Condition 51.	Noise compliance testing was undertaken by Sonus Pty Ltd (Sonus). Sonus produced a Noise Compliance Report (Sonus, November 2015, Ref: S2570C61) and an Addendum Environmental Noise Compliance Report (Sonus, January 2016, Ref: S2570C67). The Addendum report (Sonus, 2016) provided the results of additional monitoring at residences H01 and H77 between the 6 November 2015 and 5 January 2016.Evidence of the approval of Sonus Pty Ltd by the DP&E was not available for review.	Not verified	-
113	4.0	The monitoring report will be provided to the ER, the DPE, the EPA and landholder as soon as practicable following the completion of monitoring. The report will be made publically available on the Taralga Wind Farm website.	The Noise Compliance Report (Sonus, 2015) and Addendum (Sonus, 2016) were provided to DP&E and Environment Protection Authority (EPA) on 21 January 2016 by email. The Site's Environmental Representative was copied on the email. The Reports are publically available on the TWF website. The EPL was varied by Notice Number 1539398 dated 5 April 2016 to reflect that the Noise Compliance Assessment (Sonus, 2015 and 2016) had been completed and modified as a result of the assessments (such as updating receiver locations).	Compliant	-
114	4.0 & Procedure 8	Non-compliance Procedure Where the results of the noise compliance testing indicate that the noise criteria during operation is exceeded, the process outlined in Section 7 of the NMP will be followed to determine the cause of exceedances and to develop and implement a Noise Management System (NMS) to ensure compliance:	The results of the noise compliance testing (Sonus, 2015 and 2016) did not indicate any exceedances of the operational noise criteria.	Not triggered	-
115	8.2	Noise Complaint Procedure Noise complaints will be managed as outlined in Section 8.2 of the NMP.	No noise complaints were received during the audit period (1 September 2015 to 2 November 2016). Two complaints were received relating to noise prior to the audit period. A brief review of the Complaints and Enquiries Register and relevant correspondence indicated the noise complaint procedure was generally being implemented.	Not triggered	
116	8.2	Where compliance noise monitoring has not been conducted at the dwelling or at a dwelling in the vicinity of the dwelling that is closer to the nearest turbine, refer the complainant to the DPE and where directed by the DPE conduct compliance testing.	Site management reported that there have been no instances where the DP&E has directed the Wind Farm to conduct compliance testing.	Not triggered	-
117	9.0	Noise Ameliorative Measures Ameliorative measures may be provided to the receivers H1, H3, H5 or 'the Farm' if requested within first two years of operations.	Site management reported that there had been no requests received from receivers H1, H3, H5 or 'the Farm' during the audit period. It is noted that H3 was owned by the windfarm and recently on sold.	Not Triggered	-
118	4.0	WTG Maintenance WTGs are inspected and maintained regularly (six monthly) to ensure they are operating as intended.	The auditors sighted the Service Schedule which shows the dates when scheduled maintenance is due for each WTG as per manufacturer's recommendation. It is noted some of the larger turbines only require annual maintenance. The maintenance schedule for each turbine is included in SAP maintenance system which generates work orders. Upcoming maintenance was placed on the Vestas noticeboard.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
119	4.0	Substation Maintenance The Substation is inspected (monthly) and maintained regularly (six monthly) to ensure it is operating as intended.	At the time of the Site inspection the substation was undergoing maintenance and was not accessed by the auditors. Access to the substation is controlled by a permit to work system. The Asset Manager reported the substation is visually inspected on a monthly basis as part of the Environmental Inspection and that quarterly inspections are undertaken by Downer (sighted August and May 2016). The following documents were sighted: • Taralga Wind Farm HV Scheduled Maintenance, Inspections Summary Report, February 2016 (Downer EDI), Ref: ISR-TWF-2016-02, 27 April 2016. • Taralga Wind Farm HV Scheduled Maintenance, Inspections Summary Report, 3 Monthly Maintenance, May 2016 (Downer EDI), Ref: ISR-TWF-2016-05, 24 June 2016. • Taralga Wind Farm HV Scheduled Maintenance, Inspections Summary Report, 6 Monthly Maintenance, August 2016 (Downer EDI), Ref: ISR-TWF-2016-08, 15 August 2016. • Taralga Wind Farm Summary of Electrical BOP Maintenance Activities, 17/05/2016, 26/07/2016, 13/10/2016.	Compliant	-
120	4.0	Standard Working Hours Operations and maintenance activities will be carried out during the standard working hours of Monday to Friday, 7am - 6pm and Saturday, 8am-1pm. Other than as allowed by Condition L5.2 of the EPL, for: a) Any works that do not cause noise emissions to be audible (defined as 5dBA above the background noise level) at any nearby non-associated residences; b) The delivery of materials as requested by Police or other authorities for safety reasons; and c) Emergency work to avoid the loss of lives, property and/or to prevent environmental harm. **Management Doc:** Site Induction	The Site induction included reference to standard working hours. The Site induction included reference that no audible work at non-involved residences was allowed outside of standard working hours. Site management reported that Vesta's occasionally conduct some works on a Saturday morning.	Compliant	-
121	4.0	Speed Restrictions All site traffic will be restricted to the maximum speed shown on signs at all site entries.	The Vestas Contractor Induction included within the Site Rules; the following speed limits: Site Speed Limit 40 k/hr, Site Compound 10 k/hr, Warehouse 10 k/hr.	Compliant	
Appendix M EMERGENCY RESPONSE PLAN					
122	3.0	An Oil Spill Kit is located at the Site Workshop and each service vehicle.	An oil spill kit was observed in the workshop at the time of the Site inspection. Spill kits for service vehicles had been ordered and arrived on day of Site inspection.	Compliant	-
123	4.0	A list of the following emergency contacts is located in a prominent position in the Site Office, Workshop and also carried in each Site vehicle.	A list of emergency contact details was observed to be located at sign in desk and in the Asset Manager's site vehicle.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
124	4.0	The relevant authorities (EPA, ULSC, Water NSW, WorkCover, Ministry of Health, Fire and Rescue NSW, ER) must be notified immediately by the Chief Operations Officer (or delegate) in the event of a pollution incident that is causing or threatening material harm to the environment. If the Chief Operations Officer is not available to report an incident, the Site Man-ager or most senior staff member available must make this report.	Site management reported that there were no pollution incidents recorded during the audit period. The Incident Register was reviewed during the Site inspection and did not include reference to a pollution incident.	Not Triggered	-
125	5.0	Emergency Preparedness and Response The Emergency Management Committee (EMC) is a committee formed for the planning and monitoring of emergency procedures and consists of representatives from Vestas' Quality, Safety and Environment (QSE) Department, Vestas Employees, the Asset Manager and Local Emergency Services.	Site management reported that an Emergency Management Committee (EMC) had not been formed at the time of the Site inspection. Site management reported that emergency issues are discussed during monthly meetings as well as daily pre-start meetings. It was reported that a recent grass fire evacuation exercise was discussed during a monthly meeting. Fire danger levels were observed as a topic in the daily pre-starts dated 26 and September 2016 and 31 October 2016. It is acknowledged that emergency issues are discussed on a regular basis; however, as the Emergency Management Committee had not been formed during the audit period and no evidence was available to demonstrate that the planning and monitoring of emergency procedures is conducted this requirement was found to be an administrative non-compliance.	**Administrative Non-compliance**	**2016-OFI-23** An Emergency Management Committee (EMC) should be formed and should meet periodically to plan and monitor emergency procedures. Formal minutes of the EMC meeting should be recorded in the document management system.
126	5.0	All Site Staff will be trained by the Vestas QSE Department in the emergency response procedures during the Site Induction.	It was observed that the Site Environmental Induction included reference to an emergency. The Vesta Contractor Induction included a specific section concerning emergency procedures.	Compliant	-
127	5.0	The Emergency Management Committee shall prepare for and agree to the undertaking of an Annual Exercise to assess suitability of the ERP, observe actions taken and assess the preparedness of all persons. The Annual Exercise will be carried out in consultation with, and participation from, the local RFS and any other local Emergency Services who wish to participate.	The Senior Deputy Manager reported that the RFS conducted a familiarisation exercise of the Wind Farm in 2016 so that personnel could familiarise themselves with materials stored on site, fire-fighting capabilities and the arrangement of access gates. The Asset Manager reported that Vestas and local RFS conducted a small drill on-site with RFS during the audit period. This had not been documented as a formal Annual Exercise.	Compliant	**2016-OFI-24** The Annual Exercise should be documented. A record of the type of incident tested as well as the participants should be noted as well as lessons learnt. Corrective actions should be formally recorded and closed-out.
128	5.0	Emergency Duty Cards will be held in each site vehicle and by key site personal to guide them in what is required by them in case of an Emergency on-site.	An Emergency Duty Card was observed in the Asset Managers site vehicle. Key site personal held Duty Cards to guide them in what is required in case of an Emergency on-site.	Compliant	-
129	5.0	Bushfire Preparation The local RFS will be provided this ERP and consulted with regarding the Wind Farm.	The Senior Deputy Manager of the local RFS works at the windfarm and reported and confirmed that the RFS had received a copy of the ERP. Site management reported that every truck has a map of wind farm. ERP was provided to local RFS.	Compliant	-

Audit Ref #	OEMP Reference	Requirement	Comments / Evidence Sighted / Key Findings	Compliance Status	Opportunity for Improvement
130	5.0	Prior to Bushfire Season, the local RFS will be invited to inspect fire systems at the Wind Farm and provide recommendations to improve these systems.	The Senior Deputy Manager of the local RFS works at the windfarm and reported that the RFS had visited the Site but was not in a position to inspect or provide recommendations concerning the fire systems at the wind farm.	Compliant	**2016-OFI-25** At the next review of the OEMP the requirement for the local RFS to inspect fire systems at the Wind Farm and provide recommendations to improve these systems should be reviewed and revised given RFS are unable to provide such advice.
131	5.0	The local RFS will be invited to participate in the Annual Exercise at the Wind Farm.	Refer #127	Compliant	-
132	-	-	It is noted the ERP has been prepared to address the requirement of the EPL and Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) to prepare and implement a pollution incident response management plan. A detailed review of whether the ERP meets the requirements of Section Part 3A of the Protection of the Environment Operations (General) Regulation 2009 (POEO Regulations) has not been undertaken however there may be some aspects of the requirements that have not been fully documented in the ERP. It is recommended TWF undertake its own gap analysis of the ERP against the POEO Regulations to ensure the specific requirements for pollution incident response management are incorporated.	Not verified	**2016-OFI-26** Undertake a review / gap analysis to ensure the ERP includes the specific requirements outlined in Part 3A of the POEO Regulations for pollution incident response management plans.

Appendix B

Audit Meetings

Appendix B Audit Meetings

AECOM

Opening Meeting

Subject	Operational Environmental Impact Audit Report 2016				
Location:	Taralga Wind Farm	Time:		Date:	1-Nov-2016

Agenda:		Discussed
1	Welcome and introductions	✓
2	Audit background and scope	✓
3	Audit schedule	✓
4	Format of interviews and scheduling	✓
5	Discussions of information requirements	✓
6	Site inspection - Safety and PPE / photos	✓
7	Description of operations by Taralga Wind Farm	✓
8	Questions and discussions	✓
9	Next step and close	✓

Attendees

Name	Company	Position	Signature
Nick Barnard	AECOM	Lead Auditor	
Helen Orus	AECOM	Auditor	
Derek Dymond	CWP Renewables	Asset Manager	

AECOM

Closing Meeting

Subject	Operational Environmental Impact Audit Report 2016				
Location:	Taralga Wind Farm	Time:	15:30 –	Date:	2-Nov-2016

Agenda:		Discussed
1	Acknowledgements	✓
2	Summary of audit methodology	✓
3	Major findings - discussion	✓
4	Flow of information for any outstanding issues – TWF to AECOM (main point of contacts)	✓
5	Report Schedule	✓
6	Report content and delivery	✓
7	Any difficulties encountered during the audit	✓
8	Questions and feedback	✓

Attendees

Name	Company	Position	Signature
Nick Barnard	AECOM	Lead Auditor	
Helen Orus	AECOM	Auditor	
Derek Dymond	CWP Renewables	Asset Manager	

Appendix C

DP&E Correspondence

Appendix C DP&E Correspondence

NSW GOVERNMENT | Planning & Environment

Planning Services
Resource Assessments
Contact: Anthony Ko
Tel: 8217 2022
Email: anthony.ko@planning.nsw.gov.au

Ms Catherine O' Riordan
Senior Environment and Development Planner
Pacific Hydro Australia
11/474 Flinders St
MELBOURNE VIC 3000
By email: coriordan@pacifichydro.com.au

Dear Ms O' Riordan

Taralga Wind Farm –
Environmental Impact Audit Report – Operation extension of time

I refer to your letter dated 28 September 2016, requesting a 2 month extension of time from the appointment of an auditor to prepare the Environmental Impact Audit Report - Operation in accordance with condition 23 of the Conditions of Approval for Taralga Wind Farm.

In considering this request, the Department provided clarification to CWP Renewables on 8 September regarding the selection criteria of an independent person for the purposes of condition 23 and acknowledges that additional time has been required to engage a suitably independent auditor.

The Department has reviewed the CVs you provided and is satisfied that the nominated experts from AECOM are suitably experienced and qualified to independently assess the environmental performance of the project. Accordingly, the Secretary has approved the request to extend the submission date for the audit report to 6 December 2016 and has endorsed the following experts:

- Helen Onus, Principal Environmental Scientist; and
- Nick Ballard, Principal Environmental Scientist.

If you have any further enquiries about this matter, please contact Anthony Ko on (02) 8217 2022.

Yours sincerely

DKitto 4/10/16

David Kitto
Executive Director
Resource Assessments & Business Systems
as nominee for the Secretary