

Operational Environmental Impact Report

Taralga Wind Farm

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Client: Taralga Wind Farm Nominees No 1 Pty Ltd

ABN: 52 159 439 611

Prepared by

AECOM Australia Pty Ltd

Level 21, 420 George Street, Sydney NSW 2000, PO Box Q410, QVB Post Office NSW 1230, Australia

T +61 2 8934 0000 F +61 2 8934 0001 www.aecom.com

ABN 20 093 846 925

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Abbreviations

Abbreviation	Description
AECOM	AECOM Australia Pty Ltd (ABN: 20 093 846 925)
BBAMP	Bird and Bat Adaptive Management Plan
CCC	Community Consultative Committee
CWP Renewables	CWP Renewables Pty Ltd (ABN: 57 127 205 645)
DA	Development Application
DPIE	Department of Planning, Infrastructure and Environment (formerly Department of Planning (DPE))
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPL	Environment Protection Licence
ER	Environmental Representative
FFMP	Flora and Fauna Management Plan
GWh	Gigawatt hours
HMP	Heritage Management Plan
kV	kilovolt
LRMP	Landscape and Rehabilitation Management Plan
MW	Megawatt(s)
NMP	Noise Management Plan
NSW	New South Wales
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)
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
Secretary	Secretary of Department of Planning and Environment or delegate
TMP	Traffic Management Plan
TV	Television
TWF	Taralga Wind Farm
ULSC	Upper Lachlan Shire Council
Vestas	Vestas Australian Wind Technology Pty Ltd (ABN: 80 089 653 878)
VIMR	Visual Impact Mitigation Report
WMP	Waste Management Plan
WTG	Wind Turbine Generator

Executive Summary

AECOM Australia Pty Ltd (AECOM) was engaged by Taralga Wind Farm Nominees No. 1 Pty Ltd (Taralga) to prepare an Operational Environmental Impact Audit (OEIA) of the Taralga Wind Farm (TWF) 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, Infrastructure and Environment (DPIE) Development Consent (DA 241/04), dated 17 January 2006 which requires 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.*

This is the second OEIA of the TWF. The audit period for the 2019 OEIA has been defined as the operational period 03 November 2016 (completion of previous OEIA) to 30 October 2019 (date of audit site inspection).

Pacific Hydro, the owner of TWF, has prepared an Operational Environmental Management Plan, Revision 1, 5 June 2019 (OEMP) as the main tool for managing compliance with the operational requirements of the development. 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 also reviewed following the completion of the 2016 OEIA.

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 DPIE on the 29 July 2015. The DPIE, along with other relevant government agencies, was provided a copy of the updated OEMP on 5 June 2019. 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 have been effective in minimising the operational impacts of the Wind Farm. This finding has been made on the basis of:

- Observations made during the audit site inspection;
- The comparison of the operational 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 recommendations made by the 2016 OEIA;
- A review of the relevant Environmental Protection Licence (EPL) Annual Returns indicating no non-compliances had been recorded;
- A review of the sites Incident Register indicating no significant environmental incidents had been recorded during the audit period; and
- A review of the Complaints and Enquiries Register during the audit period.

The Wind Farm was considered to be operating generally in accordance with the OEMP. The key audit findings related to the following:

- Rehabilitation of embankment adjacent to Turbine 49 including addressing sediment and erosion control issues and establishment of vegetation cover.
- Continuing to monitor the revegetation of disturbed areas along the ridgeline between WTG20 and WTG31. Improvements were observed adjacent to Turbine 26 where the native bushland had begun to establish.
- Continuing to monitor erosion and sedimentation controls across the site in particular areas where rehabilitation efforts have been impacted by stock movements.
- Ensuring the ER is notified of all community complaints and including further detail in the Complaints Register available to the public to reflect community satisfaction.
- Operating the Community Consultative Committee (CCC) for the life of the wind farm.
- Improving waste segregation and waste battery storage in the service compound

A number of Opportunities for Improvement (OFIs) have been identified and are summarised in Section 6.0.

1.0 Introduction

1.1 Background

AECOM Australia Pty Ltd (AECOM) was engaged by Taralga Wind Farm Nominees No. 1 Pty Ltd (Taralga) to prepare an Operational Environmental Impact Audit (OEIA) of the Taralga Wind Farm (TWF) 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, Infrastructure and Environment (DPIE) Development Consent (DA 241/04), dated 17 January 2006, and AECOM proposal to conduct the work dated 09 August 2019.

The 2019 OEIA is the second OEIA to be conducted at the site, with the first report being prepared by AECOM in 2016. The audit period for the 2019 OEIA has been defined as the operational period 03 November 2016 (completion of previous OEIA) to 30 November 2019 (date of audit site inspection).

1.2 Audit Scope

The requirements for the OEIA are set out in Condition 23 of Development Consent (DA-241/04) which requires the following scope of works be carried out:

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.

1.3 Audit Methodology

This OEIA was undertaken in accordance with the AECOM Proposal dated 09 August 2019 to meet the scope of works described in Section 1.2.

The OEIA was carried out in general accordance with *Australia/New Zealand ISO 19011:2018 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 the TWF as observed during the Site inspection on 29 and 30 November 2019;
- 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 TWF.
- Section 7.0 provides the limitations of the report.

Appendix A is a tabulated review of the results of the assessment against the OEMP, Revision 1, 05 June 2019.

2.0 Taralga Wind Farm Operations

2.1 Site Ownership and Management Overview

Taralga wind farm is owned by Pacific Hydro Pty Ltd under the following subsidiaries:

- Energy Pacific (Vic) Pty Ltd
- Taralga Wind Farm Nominees No 1 Pty Ltd
- Taralga Wind Farm Nominees No 2 Pty Ltd
- Taralga Wind Farm Pty Ltd

Pacific Hydro has engaged Vestas Wind Systems A/S (Vestas) to act as Site Manager, Operator and turbine maintenance provider responsible for maintenance and control of the day-to-day activities at the Wind Farm.

Figure 1 shows the organisational structure of the site.

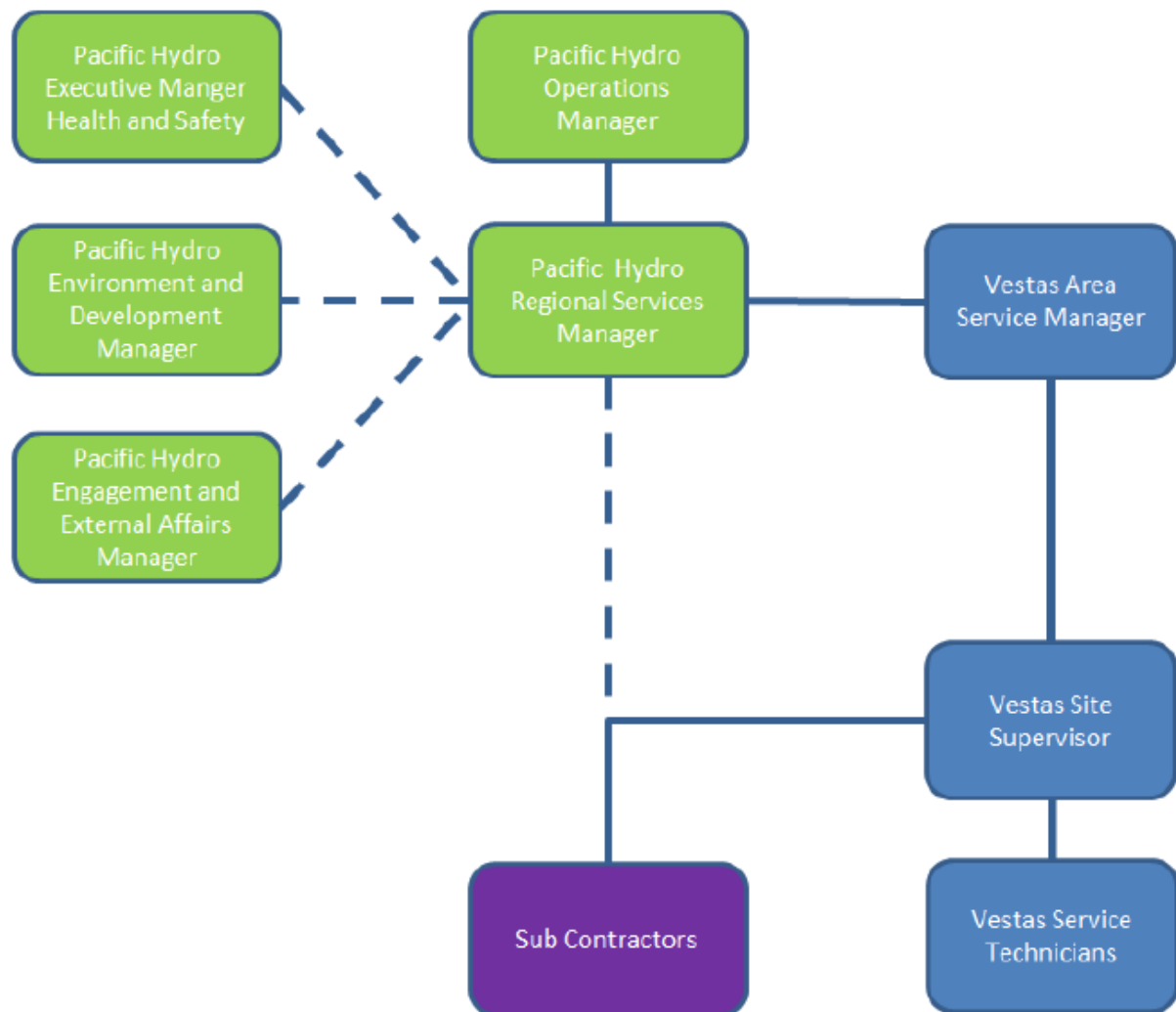


Figure 1 Taralga Wind Farm Organisational Structure

2.2 Site Description

The TWF 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 wind farm operates 51 Wind Turbine Generators (WTG) and consists of the following additional infrastructure:

- Substation
- Service compound consisting of Site Office and workshop
- WTG hardstands
- Underground electrical and fibre optic cabling
- 33 kV overhead power line and optical ground wire
- Eight wind monitoring masts
- One Digital television re-transmitter.

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, however no Modifications (MODs) have been approved during the audit period. **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 resulting in 51 turbines operating.
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 to monitoring wind conditions.
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.

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

- 51 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).

The WTGs operate 24 hours per day, seven days per week 365 days per year, whenever sufficient wind is available for operation. The Wind Farm is operated from the Site Office in the Service Compound and control room in the substation. Approximately six full time staff operate and maintain the wind farm from the Service Compound.

The TWF holds an operates under an Environment Protection Licence (EPL, Number 20429) for the Scheduled Activity of Electricity Generation.

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 Pre-audit Meeting

A pre-audit project kick-off telephone call was held on the 23 September 2019 between the following:

- Helen Onus, Auditor and Project Manager, AECOM; and
- Michael Baines, Environmental Compliance Officer, Pacific Hydro Australia.

3.2 Document Review

Pacific Hydro 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 TWF 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 completed Audit Checklist presented in **Appendix A**.

3.3 Audit Checklist

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

3.4 Site Inspection

A two-day Site inspection was conducted on 29 and 30 October 2019. The Audit Team consisted of the personnel listed in **Table 2**.

Table 2 Audit Team

Name	Position	Organisation
Helen Onus	Lead Auditor	AECOM
Kate Micheltmore	Auditor	AECOM

Helen Onus is registered by Exemplar Global as a Certified Lead Auditor for Environmental Management. Kate Micheltmore is registered by Exemplar Global as a Certified Auditor for Environmental Management.

The names of personnel interviewed during the audit are provided in Table 3.

Table 3 Name and Position of Personnel Interviewed During Site Inspection

Name	Position	Company
Michael Baines	Environmental Compliance Officer	Pacific Hydro
Julian King	Regional Services Manager - North	Pacific Hydro
Eduardo Alexandre dos Santos	Site Manager	Vestas
Darren Chesterfield	Engagement and Land Management Coordinator	Pacific Hydro

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.

3.4.1.1 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.

3.5 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 documents). 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 over two days.

4.0 Site Inspection Observations

This section provides a brief overview of key observations made during the Site inspection on 29 and 30 November 2019.

Table 4 Site Inspection Photographs




Photo #	Comment	Photo
4-1.	Examples of clusters of weeds observed in areas of the site.	
4-2.	<p>Little change was observed at the rehabilitation area located on the WTG49 embankment.</p> <p>For comparison a photo of the WTG49 embankment in 2016 has been provided (top picture). The picture below is from the 2019 OEIA Site Inspection.</p> <p>It was reported that during the period since the previous audit, attempts had been made to rehabilitate this area, including installing a temporary fence. However these had not been successful. The temporary fence was observed to have been broken in sections allowing stock access to the area.</p> <p>It was reported that a contractor has been engaged to install a permanent fence and hydro-mulch the embankment.</p> <p>2019 OEIA OFI 01 – Continue to monitor success of rehabilitation efforts at Turbine 49. Consider obtaining specialist input should attempts to hydro mulch fail to establish.</p>	 




Photo #	Comment	Photo
4-3.	Example of erosion observed on banks where rehabilitation success had been impacted by stock	
4-4.	Example of erosion (and a risk of sedimentation runoff during rainfall) due to the exposed areas on the embankment on the downhill approach to Turbine Access Road (TAR) 56/58 (photo) from TAR-52/54 (behind observer).	
4-5.	Evidence of erosion on site. A temporary fence had been put in place by TWF to prevent stock from accessing this area. The fence had been destroyed at the time of the audit allowing stock access the embankment situated on the eastern side of the track midway between TAR - 52/54/56/58 and Bannaby Road.	




Photo #	Comment	Photo
4-6.	Digital television re-transmitter	
4-7.	Offset area can be seen in the background.	
4-8.	Drainage channels have been rock lined along steep access roads to improve ground stabilisation and prevent stock from accessing the area as per this photo situated between TAR-09/10 and TAR05/06/07/08.	




Photo #	Comment	Photo
4-9.	Area where temporary fence had been installed to prevent stock access and improve rehabilitation success (east side of track on approach to TAR-31)	
4-10.	In some areas drainage channels have been rock lined to improve ground stabilisation and prevent stock from accessing the area.	
4-11.	Example of rock lined drainage channel.	



Photo #	Comment	Photo
4-12.	Rock check dams installed along access road in area near T31 where incident was recorded in July 2019 of sediment / silt being transported off-site.	
4-13.	Example of natural revegetation of disturbed area from surrounding bushland in area near T26. It is noted this section of the TWF is noted farmed and therefore not impacted by stock.	



Photo #	Comment	Photo
4-14.	Sediment dam located adjacent to the service compound.	
4-15.	Substation located near Service Compound	



Photo #	Comment	Photo
4-16.	Flammable Liquids cabinet in the workshop	
4-17.	Oily rags stored in drums on bunded pallets	



Photo #	Comment	Photo
4-18.	Waste oil rags and filters stored on bunded pallets within a container.	
4-19.	Oily rags stored in drums on bunded pallets within storage container	



Photo #	Comment	Photo
4-20.	Oil and fuel stored on banded pallets inside a storage container.	
4-21.	Oil and fuel stored in a banded container.	




Photo #	Comment	Photo
4-22.	4000 L double skinned waste oil tank	 A white, rectangular, double-skinned waste oil tank. It features several safety labels: a 'DANGER' label with 'NO SMOKING' and 'NO OPEN FLAMES' symbols, a 'WARNING' label with 'ONLY TRANSPORT WHEN EMPTY', and large black text stating 'COMBUSTIBLE LIQUID WASTE OIL' and 'SAFE FILL 4000 Litres'. A blue label on the right side reads 'TRANSTAN 07 32054436'. The tank is situated outdoors on a gravel surface with wind turbines visible in the background.
4-23.	Waste hosing and cabling stored in the service compound for pick up by waste contractor	 A large pile of black, flexible waste hosing and cabling is stored on a gravel surface. The hoses are bundled together and some are resting on wooden pallets. In the background, there is a chain-link fence, a '40' speed limit sign, and two orange and white traffic cones. The area appears to be a service compound or storage yard.

Photo #	Comment	Photo
4-24.	Waste batteries stored outside on wooden pallet in the service compound. Refer 2019 OEIA OFI 14	
4-25.	Cross contamination of general waste with recyclables. Refer 2019 OEIA REC 08	

5.0 Environmental Impact Audit Report Requirements

5.1 Comparison of EIS Predictions

The original 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 5**.

Table 5 Comparison of Key EIS Predictions relating to operations.

Key EIS Prediction	Audit Assessment
<u>Visual Impact</u> <ul style="list-style-type: none"> - 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) 	<p>A landscape and visual screening program was undertaken following the TWF construction. Landowners were notified regarding visual amenity impacts as well as information being made available on the TWF website. A landscape consultant was engaged to attend each relevant property and prepare individual landscape plans as required. At the time of the audit the landholders landscape plans had been implemented. The ER considered the visual amenity requirements to be complete.</p> <p>An on-site landscape management plan was developed in conjunction with the sites original OEMP. Following the update of the OEMP in June 2019 the commitments in the landscape management plan were considered to be largely complete and therefore removed from the OEMP.</p>
<u>Landuse</u> <ul style="list-style-type: none"> - 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. 	<p>A review of the Complaints and Enquiries Register did not identify any landowner complaints concerning the agricultural production potential of their land.</p>
<u>Noise</u> <ul style="list-style-type: none"> - 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. 	<p>Review of complaints register identified that no complaints were received during the audit period relating to noise.</p> <p>Noise monitoring was conducted in 2015 and 2016 to determine compliance with noise limits specified in the Development Consent and EPL. This included measurements for the presence of excessive tonality and low frequency. The testing did not detect tonality for any of the turbine types and also found that there was no low frequency noise. The noise compliance testing confirmed that the TWF was in compliance with the Development Consent Conditions and EPL.</p> <p>There had been no changes to the operation of WTF since the initial noise testing was conducted in 2015 and 2016..</p>

Key EIS Prediction	Audit Assessment
<p><u>Heritage</u></p> <p>The windfarm would not impact on any listed sites or places of non-indigenous heritage value.</p>	<p>Access to heritage sites was prevented during construction through use of on-site controls.</p> <p>Site management reported there had been no impacts to any listed heritage sites or places during operations. There had been no new ground-breaking activities during the audit period.</p>
<p><u>Water Quality</u></p> <p>The operation of the windfarm would have a neutral effect on water quality and no off-site impacts are likely to occur.</p>	<p>Some localised erosion associated with rehabilitation activities was observed as discussed in Section 4.0, Site Observations and Appendix A. Rehabilitation success and erosion and sedimentation was monitored through Quarterly Inspections and controls installed as required.</p>
<p><u>Flora and Fauna</u></p> <p>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</p>	<p>The results of the first two years of monitoring in accordance with the Bird and Bat Adaptive Management Plan (BBAMP) concluded that TWF had a low impact upon the local bird and bat populations. Investigations in 2017 indicated that TWF posed a low risk to threatened bird and bat species and concluded that the intensive data collection and robust statistical analysis have provided a satisfactory indication of the impact of the wind farm on bird and bat species.</p>
<p><u>Traffic and Transport</u></p> <p>On an operational basis the windfarm would not generate significant traffic volumes</p>	<p>Site management reported that traffic data is not recorded by the TWF but was able to confirm that the predictions stated Section 9.2.1 of the OEMP were generally accurate.</p> <p>Monitoring of traffic is not considered to be warranted given the low volume of vehicles during the operational phase of the Project.</p>
<p><u>Greenhouse Gas and Energy</u></p> <p>The windfarm would have a total installed capacity of 103.5-138MW and an annual energy output of 271,998MWh to 362,664MWh</p>	<p>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)</p> <p>The average annual energy generation was reported as 285,430 MWh.</p>
<p><u>Socio-economic</u></p> <p>The windfarm would not diminish tourism opportunities. The windfarm would also provide credible commercial opportunities for tourism benefits.</p>	<p>There was no evidence available for review to indicate that the Wind Farm had diminished tourism opportunities.</p> <p>The auditors sighted the Pacific Hydro TWF Community Fund SEC355 Committee Project Report. This outlines the allocated funds made to specific projects in the area during the audit period. Specific allocations were made for projects involving the Tarlga historical society, Tarlga RSL Sub Branch, Tarlga Rugby Club, Tarlga Playground, Tarlga</p>

Key EIS Prediction	Audit Assessment
	War Memorial Hall Committee and Taralga Public School to name a few.
<p><u>Communication Services</u></p> <p>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).</p> <p>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.</p>	<p>Pacific Hydro commissioned a TV re-transmitter tower in November 2015. The re-transmitter tower was installed to provide to the local community a solution to the poor television reception experienced in the area.</p> <p>A total of 98 complaints were received during the audit period, of which 77 were in relation to a television reception. Pacific Hydro investigated each complaint received. A number of complaints were in relation to component failures at local residence homes. TWF stores spare parts on site for faster remedy of these issues in future.</p> <p>A number of complaints were considered, following investigation, to be unrelated to TWF's operations. It is noted that this was not always accepted by the complainant.</p> <p>Pacific hydro has been proactive in ensuring the local community is kept informed with regards to television reception in the area. Newsletters are distributed to the community and are available on the TWF website. In addition, Pacific Hydro holds community 'town hall' meetings to inform and discuss any TV reception concerns with community members.</p> <p>It was reported there had been no impacts to other communication infrastructure during the audit period.</p>
<p><u>Hazards and Risks</u></p> <p>There are no significant risks (including air safety, bushfire risk, public, employee and electrical safety) associated with the windfarm.</p>	<p>Pacific Hydro has in place a Health, Safety, Environment and Quality Management System which is independently certified to the requirements of OHSAS 18001 (Health and Safety Management System).</p> <p>The site also maintains a Pollution Incident Response Management Plan (PIRMP) for management of pollution incidents on site.</p>
<p><u>Air Quality</u></p> <p>From an operational perspective, both at a local and global level, the windfarm would provide a net environmental improvement to air quality.</p>	<p>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.</p>

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 original OEMP was prepared in consultation with the relevant Government Agencies, certified by the ER as being in accordance with the Conditions of Consent and was approved by the Secretary of the DPIE on the 29 July 2015. In June 2019 the OEMP was reviewed and updated following the change of ownership from CWP to Pacific Hydro and to address the findings from the 2016 OEIA. The ER recertified the revised OEMP on 5 June 2019 and the DPIE was notified, in July 2019, that the OEMP had been updated.

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 6.1.

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.

5.3.1 Community Consultative Committee

The Community Consultative Committee (CCC) was established and held its first meeting in January 2014. In February 2016 the CCC agreed to reduce the frequency of meeting to annually with additional meetings to be organised on an as needed basis. However, the CCC has not met since the February 2016 meeting.

Throughout 2017 Pacific Hydro made attempts to contact the CCC independent chair to confirm the status of the CCC. Email correspondence showed that the CCC Independent Chair currently lives in Sydney and is no longer involved with Taralga. Members of the CCC believed the CCC had been disbanded following the completion of construction.

Condition 30A of the Development Consent requires the CCC to operate for the life of the development, unless otherwise agreed by the Secretary. Pacific Hydro had not obtained approval from the DPIE to cease the operation of the CCC.

2019 OEIA REC 04 - Inform the DPIE that the CCC has been disbanded and seek advice regarding the future of the CCC. Approval must be obtained from the DPIE should the CCC be dissolved indefinitely.

2019 OEIA REC 05 – Update the OEMP to reflect current community consultation practices. Also ensure that the OEMP reflects the requirements of Condition 30A of the Development Consent, in particular that the CCC is established for the life of the Wind Farm, unless otherwise agreed by the Secretary.

5.3.2 Complaint Management

The Pacific Hydro Community Engagement Team was managing TWF complaints at the time of the audit. Complaints were recorded in the Pacific Hydro SharePoint system and a redacted copy of the complaints register provided on the public website.

A total of 98 complaints, enquiries and feedback were received during the audit period, of which 77 related to television reception. A breakdown of the complaints, enquiries and feedback received during the audit period is provided in Table 6.

Table 6 Complaint, Enquiry and Feedback Summary

Complaint Issue	2016*	2017	2018	2019**
TV Re-transmitter Complaint	0	35	37	5

Complaint Issue	2016*	2017	2018	2019**
Public Access Complaint	0	0	1	0
General Enquiry	0	6	10	1
Feedback	0	1	2	0

* From the commencement of the audit period - 3 Nov 2016

** up to the end of the audit period – 30 November 2019

78% of complaints received related to TV coverage / reception issues. This is comparable with the previous audit period which identified that 73% of complaints were in relation to TV reception issues. The Complaints Register recorded these complaints as 'Closed' which implies that the issue had been satisfactorily resolved. A more in-depth review into individual complaints indicated that Pacific Hydro has considered the complaint 'Closed', on the basis that the complainant's issues are unrelated to TWF operations. The complainant was not always satisfied with this outcome.

Having a public Complaints Register which indicates all complaints have been closed may not be an accurate reflection of the status of complaints and community satisfaction. Pacific Hydro may wish to consider including additional information to indicate whether the complaint has been satisfactorily resolved.

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 EPL Annual Return submitted during the audit period 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.

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 7 provides a summary of the performance categories in respect the compliance status for each requirement or commitment.

Table 7 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.
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 no applicable at the time of the audit or had not been triggered.
Noted	A statement of fact, where no assessment of compliance is required.

Auditors 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 8** 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 9** of this report.

Table 8 Requirements assessed as Non-Compliant and Not Verified

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
004	2.3	Other permits and approvals required for the construction phase may also need to be modified, or new ones sought, for major maintenance during the operations phase (e.g. Controlled Activity Approval, Part 7 Fisheries Management Act Permit, Oversize / over-mass vehicle permit, Section 68c)	<p>The 2019 Lenders Audit conducted by the sites Environmental Representative identified that over-mass vehicles were required on site however permits could not be reviewed.</p> <p>The site could not provide evidence of over-mass / oversize permits being issued by NSW RMS relating to the audit period.</p>	Not Compliant	<p>2019 OEIA REC 01 – Ensure that where over mass / oversize permits are required, they are obtained and copies retained on file.</p>
067	9.2	<p><u>Oversize / Over-mass Vehicles</u></p> <p>In the event of major repairs requiring the replacement of a WTG blade, hub, tower or nacelle, it will be necessary for oversized/over-mass vehicles to access the Wind Farm and these vehicles will require a permit from RMS.</p> <p>Oversize/over-mass vehicles will be used on rare occasions and only for unscheduled maintenance of WTGs.</p>			
018	4.2	<p><u>Environmental Reporting</u></p> <p>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 recorded in the PH Environmental Compliance Register.</p> <p>Subject to confidentiality, the reports will be made publicly available on the Taralga Wind Farm website following approval by the DPE or issuing to the relevant government agency, as per Condition 9.</p>	<p>The auditors conducted a review of the TWF public website. Not all required documents were made publicly available at the time of the audit.</p> <p>Pacific Hydro have not been able to obtain historical documents such as the pre-construction compliance report due to the multiple stakeholders who have held ownership of the TWF.</p>	Not Compliant	<p>2019 OEIA REC 02 – Pacific Hydro to ensure that accessible documentation is made publicly available in accordance with Development Consent Condition 9. Where historical documents are not available Pacific Hydro is to consult with DPIE and provide justification why these documents cannot be obtained. Pacific Hydro should seek confirmation from the DPIE that historical documents are no</p>

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
					longer required to be made publicly available.
029	4.8	All complaints, including those regarding environmental matters, are recorded in the <i>Complaints Register</i> . This register is maintained as an online database and a redacted copy of the database is uploaded to the Wind Farm website on a regular basis for public viewing	<p>The Pacific Hydro Community Engagement Team manage all complaints. Complaints are recorded in the Pacific Hydro SharePoint system. A PDF of the complaints register for each year is provided on the public website.</p> <p>The 2019 Lenders audit report found evidence that the redacted copy of the complaints database, made available on the public website, was not being kept up to date when compared to the complaints and enquiries register kept by Pacific Hydro.</p> <p>The auditors were not provided a copy of the complaints and enquiries register kept by Pacific Hydro and as such cannot verify the findings of the 2019 Lenders Audit.</p>	Not Verified	2019 OEIA OFI 04: The complaints and enquiries register kept by Pacific Hydro must be readily available and consistent with the redacted complaints register published on the TWF website.
030	4.8	The <i>Complaints Register</i> will be maintained by the Engagement and External Affairs 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.	<p>The Complaints and Enquires Register was being maintained by the Community Engagement Team. This team is responsible for responding to complaints with assistance from other staff members where required. It was reported that the ER is notified of any serious complaints or matters which may result in multiple complaints being received. In some cases during the audit period the ER received enquiries or general complaints directly. Any enquiries or complaints received by the ER are directed to TWF immediately.</p> <p>The ER conducted an internal audit at TWF in 2019. The Report identified a non-compliance which related to the ER not being informed of all complaints received by the site. The report stated that the ER was not informed of some complaints received between April – June 2019. As per</p>	Not Compliant	2019 OEIA REC 03 – Ensure the ER is informed of all complaints received at the site. It is suggested that the complaints register identify when the ER has been involved.

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
			<p>Development Consent Condition 27, the ER has responsibilities relating to receiving and responding to complaints.</p> <p>On the basis of the ER not being notified of all complaints, this requirement has been assessed as non-compliant.</p>		
033	4.9	<p><u>Community Consultative Committee (CCC)</u></p> <p>Condition 30A requires a Community Consultative Committee (CCC) to operate for the life of the Wind Farm and in a manner generally consistent with the requirements of Appendix C: Guidelines for wind farm consultative committees, as contained in the Draft NSW Planning Guidelines - Wind Farms (Draft NSW Guidelines, December 2011).</p> <p>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 twice a year after the first two years of operations:</p>	<p>In February 2016 the CCC agreed to reduce the frequency of meeting to annually with additional meetings to be organised on an as needed basis. The auditors were informed that the CCC has not met since the February 2016 meeting.</p> <p>The Pacific Hydro External Affairs manager attempted to contact the CCC Independent Chair to confirm the status of the CCC throughout 2017.</p> <p>An email from the CCC Independent Chair received on the 6th November 2017 identified that the CCC Independent Chair currently lives in Sydney and has no involvement with Taralga anymore.</p> <p>An email from a CCC Member on the 8 December 2017 and CCC independent Chair to Pacific Hydro stated that the <i>CCC was developed and operated during the construction phase and disbanded when the wind farm was commissioned.</i></p>	Not Compliant	<p>2019 OEIA REC 04 - inform the DPIE that the CCC has been disbanded and seek advice regarding the future of the CCC. Approval must be obtained from the DPIE should the CCC be dissolved indefinitely.</p> <p>2019 OEIA REC 05 – Update the OEMP to reflect current community consultation practices. Also ensure that the OEMP reflects the requirements of Condition 30A of the Development Consent ,in particular that the CCC is established for the life of the Wind Farm, <i>unless otherwise agreed by the Secretary.</i></p>
034	4.9	<p>CCC meetings are organised by the Engagement and External Affairs Manager and may be attended by the Regional Services 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.</p>	<p>Condition 30A of the Development Consent requires the CCC to operate for the life of the development, unless otherwise agreed by the Secretary. At the time of the audit the CCC was not operating. Approval from the DPIE had not been obtained to cease the operation of the CCC.</p> <p>This issue was previously identified by the ER in the 2019 Lenders Audit report.</p>		

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
043	5.1.1	<p><u>Conditions relevant to the RSWQMP</u></p> <p>DPE – Conditions 31, 32, 33, 96, 97, 98, 99, 113</p> <p>EPL – L1, O3, O5, M3, R2</p>	<p>Table 5 within Section 5.1.1 references Conditions 31, 32 and 33 which relate to landscaping requirements. The OEMP does not discuss landscape management, as detailed in Conditions 31, 32 and 33.</p> <p>An on-site landscape management plan was developed in conjunction with the original OEMP. Following the update of the OEMP the commitments in the landscape management plan were largely complete. The relevant Development Consent Conditions were reassigned to the rehabilitation section of the OEMP however, discussion of the actual requirements and how they are being addressed is not provided .</p> <p>Condition 31 of the Project Approval requires the Landscape management plan to be implemented within 6 months of commencement of Operation and to be maintained. Item c) specifically requires that the Plan include “<i>details of the maintenance program for on-site landscaping associated with the development</i>”.</p> <p>The current OEMP does not adequately address the landscaping requirements of the Development Consent.</p>	Not Compliant	<p>2019 OEIA REC 06 – Ensure the OEMP addresses the requirements of the Development Consent relating to landscaping that are applicable to operations. This can be done by developing a stand-alone Landscape Management Plan to be included as an Appendix to the OEMP, as its own section within the OEMP or incorporated into Section 5 – Rehabilitation, Soil and Water Quality Management Plan of the OEMP.</p>
046	5.4	<p><u>Measurable Targets</u></p> <p>Continual rehabilitation of:</p> <ul style="list-style-type: none"> - disturbed areas between T20-T27 rehabilitated to at least 50% ground cover - disturbed areas everywhere else rehabilitated to at least 70% ground cover 	<p>The auditors were informed that a number of rehabilitation techniques such as re-seeding, were attempted during the audit period however due to the regional weather conditions and stock on site most rehabilitation success had been limited.</p> <p>Rock lining was placed in drains which run along track 11 to assist with ground stabilisation. In addition, a number of areas have been identified as requiring further stabilisation</p>	Not Verified	<p>2019 OEIA OFI 06 – Consider how success against this target will be measured</p>

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
			<p>work and fencing installed to prevent erosion and assist ongoing rehabilitation efforts.</p> <p>There was no formal system in place to measure % ground cover. This target was used to provide a high-level estimate of success.</p> <p>The Quarterly inspection reports review rehabilitation success and identify areas that require further work however do not specifically measure against this target.</p>		
049	5.4	<u>Measurable Targets</u> Prevention of sediment flow off Site	<p>Once incident was recorded in July 2019 which related to sediment flowing offsite. During an environmental audit conducted by Pacific Hydro the auditors identified erosion and offsite transport of erosion at TWF. Pacific Hydro engaged Vestas to commission contractor Divalls to install new rockliner in the drain to prevent further offsite transport of sediment flow.</p> <p>The incident report states that the release did not exceed the reportable quantities, caused no material harm to the environment and was not required to be reported to external agencies under the POEO Act.</p> <p>A follow up inspection was conducted in October 2019 to verify the new rock erosion controls had been installed.</p> <p>The auditors sighted that remedial works had been undertaken and were observed during the audit site inspection (refer photos in main report).</p> <p>Pacific Hydro have actions to ensure continual monitoring of the area is conducted to determine the effectiveness of the implemented controls. As such, the auditors have not applied a recommendation to this finding.</p>	Not Compliant	Not Required

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
054	6.1.1	This Noise Management section summarises the noise and vibration impacts and controls discussed in the Noise Management plan (NMP) (Appendix D) that may result from operation of the Taralga Wind Farm.	The Noise Management Plan is not included in Appendix D and is not available on the public website. The Noise Management Plan referred to is the 2016 CWP Noise Management Plan. This plan was provided to the auditors.	Not Compliant	2019 OEIA REC 07 – Update the Noise Management Plan to be a Pacific Hydro document and make available on the TWF website.
076	10.4	<u>Waste Measurable Targets</u> Any waste not correctly stored or managed on-site addressed promptly	The site inspection identified the following: <ul style="list-style-type: none"> - Within the service compound a range of waste classes are stored including; general, gas bottles, recycling, oil, scrap metal, batteries, and greasy and oily rags. - Tutt Bryan has been engaged to remove other classes of waste from site. General waste was transferred to Goulburn landfill. - Separate waste receptacles at the O&M compound were available for waste separation. The auditors observed co-mingling of waste classes on site at the time of the audit site inspection. Non-recyclable material was placed in the recycling bin and general waste was sighted in the scrap metal bin. - Waste batteries were stored on a wooden pallet outside. The batteries were not covered and were located on a gravel/dirt surface. - Hazardous waste storage was located in purpose-built containers. 	Not Compliant	<p>2019 OEIA REC 08 – Ensure waste is adequately segregated. Reiterate to workers in the service compound the requirements for waste segregation.</p> <p>2019 OEIA OFI 14 – Improve storage of waste batteries by considering storing the waste batteries under cover with adequate spill containment in place.</p>
081	11.4	Resolution of television re-transmitter equipment failure or downtime	<p>The OEMP requires a response to a complainant to occur within 24 hours of receipt of a complaint.</p> <p>The auditors could not verify if complaints had been responded to within 24 hours, based on the information provided. However, the 2019 lenders audit identified that the</p>	Not Verified	2019 OEIA OFI 15 – Address the recommendation made in the 2019 Lenders Audit to review the requirement in the OEMP and for Pacific Hydro to

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
			<p><i>complaints line goes back to a call back service which creates a voicemail in an inbox which is allocated to the person looking after the asset and is resolved on a case by case basis.</i> A recommendation was made in the 2019 Lenders Audit to review the requirement in the OEMP and for Pacific Hydro to review the procedure around the response.</p> <p>It was reported that there was a long lead time for television re-transmitter spare parts which resulted in some complaints not being resolved for three months whilst waiting for specialist parts to arrive to fix the tv re-transmitter. Pacific Hydro has invested in purchasing specialised spare parts to mitigate this long lead time in the future.</p>		review the procedure around the response.
089	3.4.4	<p>In future, each annual report will contain:</p> <ul style="list-style-type: none"> - A brief description of the management prescriptions implemented and identify modifications made to the original management practices proposed - Results from any bird and bat utilisation surveys and discussion on any observed changes in habitat utilisation or population numbers, and any reasons for the observed changes - Results from any bird and bat collision surveys and an estimate of collisions that takes into consideration the scavenger and searcher efficiency correction factors 	<p>Annual Reports post the second-year annual report have not been prepared. This was due to a misinterpretation of the requirement for ongoing reporting given the recommendation in the second-year report for not continuing the formal monitoring program.</p> <p>The auditor's interpretation of Development Consent Condition 93 and Section 3.4.4 of the BBAMP is that annual reports are still required unless otherwise agreed with the DPIE.</p>	Not Compliant	<p>2019 OEIA REC 09 – Ensure Annual Reports on the BBAMP are prepared and provided to the Secretary of the DPIE in accordance with Condition 93 of the Development Consent</p> <p>2019 OEIA OFI 17 –Consider making it clearer in Section 3.3.4 that future annual reports must also be submitted to the Secretary of the DPIE as per Condition 93.</p>

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
		<ul style="list-style-type: none"> - Reports on any carcasses recorded outside any formal carcass searches - Results from the comparison of management prescriptions with the performance criteria - Discussion of the analysis of results and the efficacy of the management plan - Details of payments made to WIRES - Mitigation measures implemented - Any significant impact triggers recorded - Analysis of the effectiveness of the Decision-making framework; and - Proposed modifications to the adaptive management program 			
090	3.5	<p><u>Mitigation measures to reduce risk</u></p> <p>During lambing season (usually late autumn / early winter) working with landholders to minimise lambing within 500 metres of turbines, and during lambing season monitor any instances of lambing in paddocks with 200 metres of turbines</p>	<p>It was reported that discussions have been held with landowners however Pacific Hydro is restricted with how much it can influence farmers actions / enforce lambing >500m of turbines. It is also noted that for some landowners their boundaries are within 500m of a turbine and therefore they are unable to conduct lambing in excess of 500m from a turbine.</p> <p>The site reports that this has not generally been an issue in the past.</p> <p>The 2016 OEIA report provided an OFI to discuss amendment of the BBAMP with BL&A to determine the best</p>	Not Compliant	2019 OEIA REC 10 – Update the OEMP to reflect the limitations that some landholders have regarding lambing in excess of 500m from a turbine.

Audit Ref #	OEMP Ref	Requirement	Audit Findings	Compliance Status	Recommendation / Opportunity for Improvement
			course of action and to discuss and agree with OEH a course of action. Pacific Hydro committed to amending this commitment in the BBAMP, in its Action Plan dated 31 August 2017. At the time of the audit this condition remained in the BBAMP and could not be adequately complied with or enforced due to practicalities and landholders lease requirements.		
120	6.6	<p><u>Audit and Review of the PIRMP</u></p> <p>EPA guidelines state that it is a legislative requirement that PIRMPs must be tested as follows:</p> <ul style="list-style-type: none"> - Routinely tested at least once every 12 months - Within one month of any pollution incident occurring in the course of any activity to which the licence relates. <p>Details of the test of the PIRMP need to be recorded and where the PIRMP is updated it should be uploaded to the TWF website.</p>	<p>The EPA website reports that the PIRMP was last tested on 17 July 2018. Details of the tests of the PIRMP were not identified on the TWF website as stated in the PIRMP.</p> <p>Following the audit site inspection the auditors were provided with a record of the PIRMP being testing on 13 December 2019. The PIRMP was not tested at least every 12 months as committed to in the OEMP and EPA guidelines.</p>	Not Compliant	<p>2019 OEIA RFI 11 – Testing of the PIRMP must be conducted at least every 12 months. Ensure records of testing are maintained and readily available.</p> <p>2019 OEIA OFI 18 – Ensure details of the tests of the PIRMP are available on the TWF website.</p>

6.1 Additional Opportunities for Improvement

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 9 Opportunities for Improvement for Requirements Considered Compliant

Audit Ref #	Number	Opportunity for Improvement
012	3.8	2019 OEIA OFI 01 – Ensure the OEMP details the ER responsibilities stated in Condition 27 of the Development Consent.
023	4.6	2019 OEIA OFI 02 – Update section 4.6.1 of the OEMP to refer to the new induction process.
026	4.7	2019 OEIA OFI 03 – Ensure the OEMP refers to the new environment and incident reporting procedure.
037	4.10	2019 OEIA OFI 05 – Update the OEMP to reflect current practice of managing actions from quarterly inspections through the FIXD maintenance system and not the Audit Action Register.
056	6.4	2019 OEIA OFI 07 – It is recommended that the Noise Management Plan (NMP) be updated to clarify that all noise compliance testing has been conducted in the past and is not a required ongoing compliance measure. Table 9 should specifically refer to past noise compliance testing.
058	Measurable Targets	2019 OEIA OFI 08 – Vehicle inspections conducted in accordance with Vestas Plant Acceptance Checks form should be conducted and recorded.
061	8.3	2019 OEIA OFI 09 – Include additional heritage information within the new site induction to facilitate awareness of heritage values associated with the TWF and ensure everyone is aware of the process for any for any breaking-ground works.
065	9.1	2019 OEIA OFI 10 – Update section 9.1 of the OEMP to make it clearer when a task specific Traffic Management Plan would be required.
074	10.4	2019 OEIA OFI 11 – Ensure that Transport Certificates are maintained for all hazardous material transported from site. .
		2019 OEIA OFI 12 - Update the OEMP to include further detail / guidance on the waste tracking process for hazardous waste and the responsibilities of waste producers under the Protection of the Environment Operations OEO (Waste) Regulation 2014.
		2019 OEIA OFI 13 - Consider developing a Waste Register to document the waste type, volume, date picked up, transporter, destination and whether the waste was recycled or disposed. This would assist in tracking waste, ensuring it is appropriately disposed and reporting against any corporate sustainability targets.
088	3.4.4	2019 OEIA OFI 16 – Seek formal approval or endorsement of the revised BBAMP as evidence that the approach to ceasing formal carcass monitoring is accepted and that concerns of the OEH have been adequately addressed.

6.2 Response to 2016 OEIA Recommendations

The audit assessed compliance with the recommendations made in the 2016 OEIR. A summary of the auditors review is provided in Table 10.

Table 10 Review of previous recommendations

Recommendation	2019 Findings
2016-OFI-01 Update the Management Structure and Responsibilities to reflect the existing roles within the next revision of the OEMP.	The Management structure and responsibilities section of the OEMP has been updated to reflect the existing roles across the business, including the change in management from CWP Renewables to Pacific Hydro.
2016-OFI-02 Critical site management documents should be stored and maintained in the official hosted document management system.	Project information and documentation is now stored on the Pacific Hydro hosted SharePoint management system.
2016-OFI-03 The EPL Annual Return should be made available on the Wind Farm website.	The EPL Annual Return is available on the TWF Public Website.
2016-OFI-04 Maintain a Risk Management Procedure.	TWF maintains an impacts and aspects register which was originally developed in 2016. The register is maintained as a live document by the Environment and Development Team. The aspects and impacts register was developed in accordance with the Pacific Hydro Australian HSE Procedure PHA.HSE.03.001 – Risk Management Procedure.
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).	Incidents are recorded under the Pacific Hydro incident and reporting system called Intellex. Bird strikes and failure of erosion and sediment controls were recorded in the incident register.
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.	<p>An additional column detailing the complaint category (e.g. visual, TV transmission etc.) was added to the complaints register. Review of complaints records indicates that complaints are identified as ‘closed’ however in many cases relating to TV Retransmissions the complainant’s issue was not resolved.</p> <p>Having a public Complaints Register which indicates all complaints have been closed may not be an accurate reflection of the status of complaints and community satisfaction. Pacific Hydro may wish to consider including additional information to indicate whether the complaint has been satisfactorily resolved.</p>
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”.	These OFI's are no longer applicable since the transition from CWP Renewables to Pacific Hydro was finalised. Quarterly Inspection issues were generally managed through Pacific Hydro’s maintenance system FIXD.

Recommendation	2019 Findings
<p>2016-OFI-08</p> <p>Consider issuing a formal CAR to address some of the issues identified in the Environmental Inspection Issues Register.</p>	<p>This OFI is no longer applicable since the transition from CWP Renewables to Pacific Hydro was finalised.</p>
<p>2016-OFI-09</p> <p>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.</p>	<p>The audit site inspection in October 2019 indicated some areas where the native bushland was starting to colonise the rehabilitated area, in particular near TPG 24, 25 and 26 (refer Photo 4-13). Ground cover was observed to include leaf litter, bark and rock.</p> <p>The auditors were informed that a number of rehabilitation techniques such as re-seeding, were attempted during the audit period however due to the regional weather conditions and stock on site rehabilitation success had been limited.</p> <p>The Quarterly Inspection Reports review rehabilitation success and identify areas that require further work.</p>
<p>2016-OFI-10</p> <p>An alternative control to spraying should be considered and implemented for weed management on land adjacent to landowner's crops.</p>	<p>Spraying on or adjacent to landowners land is conducted in consultation with the Landowner.</p>
<p>2016-OFI-11</p> <p>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.</p>	<p>The embankment to the north of turbine 49 had not shown signs of improvement since the 2016 OEIA and still required attention. A temporary fence had been installed in 2017 in an attempt to protect the steep embankment from stock, however this had not been effective and the temporary fence did not last.</p> <p>Pacific Hydro has recently engaged Vestas to manage Hydro Mulching and installation of a permanent fence around the embankments near Turbines 49 and 31.</p> <p>Refer 2019 OEIA REC 01</p>
<p>2016-OFI-12a</p> <p>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.</p>	<p>Evidence of erosion and sedimentation was observed across the site. These areas were known to site personnel who were actively implementing additional controls to manage erosion risks across the site.</p> <p>Additional controls put in place include:</p> <ul style="list-style-type: none"> - Rock lining is in place in drainage channels to increase ground stabilisation and to prevent stock from accessing drainage lines. - Rock check dams have been installed and designed in a 'V' configuration to prevent erosion caused by overflow of water. - Pacific Hydro has been actively consulting with landowners regarding erosion controls and the impacts of stock across the site. Additional controls such as fencing have been considered

Recommendation	2019 Findings
	following identification of impacts caused by stock to the drainage system.
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).	The drainage line near Turbine 49 was re-designed and a new runoff drainage line constructed.
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.	Temporary fences were installed in 2017 at high erosion hazard areas near Turbine 49 and on track 10. The auditors observed during the audit site inspection that some fences had been damaged due to weather, stock or farming practices.
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.	<p>The erosion at Turbine 49 had not been logged as an incident but was being monitored during Quarterly Inspections and actions raised as work orders in FIXD.</p> <p>The erosion of the drains along the access road near Turbine 31 where silt was observed offsite onto neighbouring land was logged as an incident in Pacific Hydro's management system 'Intelix' on the 9 July 2019 and corrective actions taken formally tracked. This included engaging a contractor to install new rockliner in the drain. The incident was closed on the 30 October 2019, when a site visit confirmed the erosion control had been installed and photographic evidence collected.</p> <p>The Intelix system has been in place since early August 2017. Intelix allows for environmental incidents specifically 'erosion' related incidents to be logged and tracked. Intelix includes sections for recording incident details, reporting investigations, assigning corrective actions, approvals and incident closure reports. Intelix also allows for task tracking and escalation with notifications sent to the responsible personnel.</p>
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.	As the TWF does not exceed the manifest quantity for storage of hazardous substances and dangerous goods, this is not required.
2016-OFI-14a Drums containing controlled wastes (i.e. oily rags) should be stored with secondary containment in a dedicated storage area.	Drums of oily rags were stored on banded pallets within a storage container (refer Photo 4-19).
2016-OFI-14b	Drums were now stored on banded pallets within a dedicated storage container. During the previous

Recommendation	2019 Findings
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, drums were stored outside directly on the ground.
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.	This OFI was applicable when CWP Renewables had ownership of the site. At the time of the audit Vestas was providing training in the use of spill kits and spill response.
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.	The Environmental Site induction notes that damage should be prevented at known sensitive areas (heritage and flora and fauna). 2019 OEIA OFI 09
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.	This OFI was not actioned. The legislation and classification of weeds has changed since 2016. It is recommended that the Flora and Fauna Management Plan is updated to reflect this. 2019 OEIA OFI 03 – Update the Flora and Fauna Management Plan to include further details of obligations relating to weeds under the Biosecurity Act and the Upper Lachlan Shire Council's South East Regional Strategic Weed Management Plan.
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.	This OFI was not actioned. The Quarterly Inspection reports do not include any checklists or prompts. Appendix G to the OEMP includes a Weed Identification Table. The Regional Service Manager has access to this table.
2016-OFI-18 Update the Site induction to include graphical reference to known archaeological / heritage sites. This is not highlighted in the induction, The site induction includes information to not divert from the approved routes. The map provided during the induction includes reference to the known heritage items.	No specific details are provided to detract personnel from looking for heritage items. Heritage items are specifically not referenced in the site induction to prevent personnel from seeking them out.
2016-OFI-19 Prepare a Road Safety Report in consultation with RMS and ULSC.	Pacific Hydro engaged Transport Planning Partnership Pty Ltd to undertake consultation with ULSC and RMS and to prepare a road safety report to satisfy the requirements of the OEMP and Condition 82 of the TWF Conditions of Consent.
2016-OFI-20 Ensure waste receptacles within the Site Compound are labelled and covered.	Separate waste receptacles at the Service Compound were available for waste separation. Not all waste receptacles within the service compound were covered. Labels were present on receptacles to identify the type of waste to be held inside. Waste batteries were stored on a wooden pallet outside. The batteries were not covered and were located on a gravel/dirt surface.

Recommendation	2019 Findings
	2019 OEIA REC 06 – <i>Improve storage of waste batteries by considering storing the waste batteries under cover with adequate spill containment in place.</i>
2016-OFI-21 Confirm if the waste contractor is licensed to dispose of waste generated at the Site (i.e. general waste).	Waste contractor used on site was Cleanaway. Tutt Bryant waste receptacles also sighted on site.
2016-OFI-22 Consideration should be given to removing the requirement relating to restricting lambing to paddocks within 500m of a turbine from next revision of BBAMP	<p>It was reported that discussions have been held with landowners however Pacific Hydro is restricted with how much it can influence farmers actions / enforce lambing >500m of turbines. It is also noted that for some landowners their boundaries are within 500m of a turbine and therefore they are unable to conduct lambing in excess of 500m from a turbine.</p> <p>The 2016 OEIA report provided an OFI to discuss amendment of the BBAMP with BL&A to determine the best course of action and to discuss and agree with OEH a course of action. Pacific Hydro committed to amending this commitment in the BBAMP, in its Action Plan dated 31 August 2017.</p> <p>The revised BBAMP states that the TWF should continue to minimise the potential attractiveness of the site to Wedge-tailed eagles which would include:</p> <p><i>“during lambing season (usually late autumn / early winter) working with landholders to minimise lambing within 500 metres of turbines and during lambing season monitor any instances of lambing in paddocks within 200 metres of turbines.”</i></p>
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.	This OFI related to the Vestas Emergency Response Plan which was in place during the previous audit. This has now been replaced by Vestas' Emergency Response Plan and the TWF Pollution Incident Response Management Plan (PIRMP). An assessment of implementation of the PIRMP is provided in Appendix A .
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.	<p>The PIRMP is required to be tested annually. The EPA website reports that the PIRMP was last tested on 17 July 2018.</p> <p>Refer 2019 OEIA REC 11</p>
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.	This condition has been removed from the OEMP.
2016-OFI-26	The site has since developed a PIRMP which is included in Appendix J of the OEMP. The PIRMP was developed to address the requirements of Part 5.7A

Recommendation	2019 Findings
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.	of the POEO Act and the POEO Regulations 2009. An assessment of implementation of the PIRMP is provided in Appendix A.

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 Taralga Wind Farm Nominee No 1 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 dated 9 August 2019.

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 31 October 2019 and 13 December 2019 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	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
1.0 Introduction to the Wind Farm					
001	1.3	Operations and maintenance activities will be carried out during the standard working hours of Monday to Friday, 7am - 6pm and Saturday, 8am-1pm. An exception to these hours, as per Condition L5.2 of the Environment Protection Licence (EPL), is the following activities: 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.	Complaints Register (2016-2019) Interviews with site personnel Annual Return 2017-2018 Annual Return 2016-2017	Interviews conducted with Pacific Hydro staff indicated that work is generally conducted within the hours specified. On occasion however work is conducted on site post 1pm on Saturday and Sundays. The type of work conducted outside of the prescribed hours is generally turbine breakdown maintenance and service work. No noise creating work, i.e. use of hydraulic pumps, is reportedly conducted during these out of hours of work. The auditors reviewed a summary of complaints and incidents recorded as well as EPL Annual Returns submitted during the audit period. No complaints or incidents were received during the audit period in relation to noise. In addition, the evidence reviewed did not indicate that noise generating work was conducted outside of the sites prescribed hours.	Compliant
2.0 Introduction to the Operation Environmental Management Plan					
002	2.2	The Pacific Hydro Health Safety Environment Quality Policy is available on the Pacific Hydro document management system, displayed in a prominent location in the Site Office and is a central component of the Site Induction training for all Site Staff.	Site Inspection TWF Site Induction	The Taralga Environment Policy dated 4 December 2018 was sighted on the noticeboard located at the site office entrance log in / log off desk. The Environmental Policy was also included in the Site Induction and the Vestas Contractor Induction.	Compliant
003	2.3	ULSC should be consulted before any maintenance work is undertaken on public roads. A Section 138 approval may be required if substantial works are required.	Site Inspection Interview with Pacific Hydro	The auditors were informed that no maintenance work on public roads was conducted during the audit period. The auditors did not identify any work which was conducted during the audit period which would require a Section 138 Roads Act Approval.	Not Triggered
004	2.3	Other permits and approvals required for the construction phase may also need to be modified, or new ones sought, for major maintenance during the operations phase (e.g. Controlled Activity Approval, Part 7 Fisheries Management Act Permit, Oversize / over-mass vehicle permit, Section 68c)	Site Inspection Interviews with Pacific Hydro ER Lenders Audit Report, TWF, Molino Steward, August 2019	The 2019 Lenders Audit conducted by the sites Environmental Representative identified that over-mass vehicles were required on site however permits could not be reviewed. The site could not provide evidence of over-mass / oversize permits being issued by NSW RMS relating to the audit period.	Not Compliant 2019 OEIA REC 01 – Ensure that where over mass / oversize permits are required, they are obtained and copies retained on file.
3.0 Management Structure and Responsibilities					
005	3.1	The Regional Services Manager (Pacific Hydro) has primary responsibility for the overall management of the Wind Farm. In the context of this OEMP, this person's primary responsibility is to implement the environmental practices and oversees the operational compliance of the Wind Farm in accordance with the OEMP.	Interviews with site personnel Aspects/Impacts Register, May 2019	There are three Regional Service Managers in place which manage South Australia, Central / Victoria and South Victoria. The Taralga Wind Farm (TWF) lies within the responsibility of the Regional Services Manager (North & South Australia). The Regional Services Manager was interviewed during the audit site inspection and was found to be knowledgeable of the site's environmental obligations. The sites Environmental Impact/Aspects register states that it is implemented by the Regional Services Manager.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
006	3.2	The Health and Safety Manager (Pacific Hydro) through its delegates will ensure that Pacific Hydro complies with all relevant HSEQ legislation and will ensure that HSEQ specifications are in accordance with Pacific Hydro's and / or the contract's requirements utilising a planned program of internal and external system audits such as ISO14001 Environmental Management System and AS 4801 Occupational Health and Safety Management Systems.	Taralga Wind Farm Environmental Compliance Report, Molino Stewart Pty Ltd, dated 01/08/19 Certificate of Registration, ISO 14001:2018, EMS Certificate 604335	The wind farms Health and Safety Manager is based in the Pacific Hydro Office in Melbourne. It was explained that in general, the HSEQ Advisors implement the responsibilities assigned to the Health and Safety Manager. The Environment Compliance Officer and HSEQ Advisors usually conduct internal annual audits assessing compliance with legislative, contract and corporate requirements across their wind farm portfolio. However, as the TWF is audited annually by the Environmental Representative (ER), these audits are considered to fulfil that requirement. The Environment Compliance Officer reviews the ER audit report. Pacific Hydro has held ISO 14001 certification since 15/08/2008. Annual surveillance audits occur across the business every October with recertification audits occurring every three years. This process is managed by the HSEQ Executive.	Compliant
007	3.3	The Environment and Development Manager (Pacific Hydro) through its delegates has the responsibility to ensure that the Wind Farm is regularly monitored for environmental performance and compliance utilising tools within the HSEQ management system such as the Approvals Compliance Register and its Environmental Compliance Monitoring Program.	Compliance Register PHA.ENV.REG.003	The Environment and Development Manager is based in Melbourne Implementation of the monitoring of environmental performance and compliance is delegated to the Environment Compliance Officer. Two additional resources are in place to assist with this (Environment and Development Planners). The Compliance register PHA.ENV.REG.003 is managed by the Environment Development Team. The auditors sighted the compliance register which includes the following: <ul style="list-style-type: none">- Approval document reference- Condition requirement- Project Phase (pre-construction, construction, operation)- Condition status (i.e. ongoing)- Compliance Status- Schedule of ongoing requirements	Compliant
008	3.4	The responsibilities of the Engagement and External Affairs Manager (Pacific Hydro) are to engage with the local community through its delegates by managing the complaints process and maintaining the Wind Farm's public website.	Interview with Pacific Hydro	The Engagement and External Affairs Manager is based in Melbourne. It was reported that Engagement and External Affairs Manager manages the public website, community engagement, media consultation and complaints / community enquiries.	Compliant
009	3.5	The Area Service Manager (Vestas) has primary responsibility for managing and controlling the day-to-day activity on the Wind Farm and is responsible for implementing the environmental requirements within the OEMP.	Interview with Pacific Hydro Interview with Vestas	The Area Service Manager (Vestas) is not based on site. The day to day implementation of environmental requirements within the OEMP is delegated to the Vestas Site Supervisor who is based on site Monday – Friday. Interviews with the Site Supervisor confirmed responsibilities were generally being undertaken.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
010	3.6	In addition to the management positions referred to above, there will be a site supervisor and 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. Along with their own duties, site staff are to comply with all requirements of the OEMP and will immediately cease, and report, any workplace activity (including that of other persons) which presents an immediate risk to the environment.	Interview with Vestas Visitor Induction – provided to auditors on 29/10/2019 Induction Register (VESTAS)	The Site Supervisor (Vestas) was interviewed during the audit site inspection. Service technicians and administrative staff were observed to on site. Staff are made aware of the requirements of the OEMP through completion of the site induction which includes reference to the sites environmental management controls in place at TWF.	Compliant
011	3.7	A small pool of subcontractors, primarily civil contractors and consultants engaged on technical and compliance matters, will be required to undertake a Site Induction and comply with all aspects of this OEMP and all associated compliance documents, permits, procedures and standards.	Visitor Induction – provided to auditors on 29/10/2019 General Induction (VESTAS) Induction Register (VESTAS)	Vestas has developed a new levelled induction to deliver the required level of detail for the work being conducted on site. This includes: <ul style="list-style-type: none">- Visitor Induction- General Work Induction- High Voltage access induction- Wind turbine induction At the time of the audit this visitor induction was being trialled and was not yet fully being implemented. As such, Vestas was utilising the previous version of the overarching induction. 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
012	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.	TWF Public Website ER Lenders Audit Report, TWF, Molino Steward, August 2019 ER Lenders Audit Report, TWF, Molino Steward, August 2017 ER Lenders Audit Report, TWF, Molino Steward, November 2016 Letter from ER – Molino Stewart Pty Ltd titled 'Taralga Wind Farm – 2019 Operational Environmental Management Plan', dated 05/06/2019	The DPIE appointed Environmental Representative (ER), Ms Shireen Baguley from Molino Stewart Pty Ltd, continues to be involved in the Project. The ER's contact details were available on the TWF website. Responsibilities outlined in Condition 27 of the consent are not outlined in the OEMP directly. According to Condition 27, the ER must be: <ul style="list-style-type: none">a) The primary contact point in relation to the environmental performance of the developmentb) Responsible for all management plans and monitoring programs required under this consentc) Responsible for considering and advising on matters specified in the conditions of this consent, and all other licences and approvals related to the environmental performance and impacts of the developmentd) Responsible for receiving and responding to complaints in accordance with this consent ande) Given the authority and independence to require reasonable steps to be taken to avoid or minimise unintended environmental impacts, and failing the effectiveness of such steps, to direct the relevant actions be ceased immediately should an adverse impact on the environment be likely to occur. Since the project has moved into operations, the ER's involvement in the ongoing management of the site has diminished. The ER conducts the following for the site: <ul style="list-style-type: none">- Annual Environmental Compliance Reports on behalf of the wind farm's lenders.	Compliant 2019 OEIA OFI 01 – Ensure the OEMP details the ER responsibilities stated in Condition 27 of the Development Consent.

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
				<ul style="list-style-type: none"> - Certification of the OEMP: The ER recertified the OEMP on 5 June 2019 following the a major update to the document. - Periodic site inspections - Consultation on Community Complaints and Site Incidents (where notified by Pacific Hydro) <p>Given, the reduction in risk for environmental impacts from construction to operation, Pacific Hydro could consider requesting to change the appointment of the ER to an internal Pacific Hydro person. This would need to be approved by the Secretary of the DPIE.</p>	
013	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 covering both Safety and Environmental requirements relevant to their activities.	<p>Visitor Induction – provided to auditors on 29/10/2019</p> <p>General Induction (VETAS)</p> <p>Induction Register (VESTAS)</p>	<p>The auditors undertook the new Environmental Induction provided by Pacific Hydro. The induction covered the key environmental and safety requirements of the site. In addition, contractors must also undertake the Vesta Contractor Induction.</p> <p>As per the evidence against Condition 011, Vestas has developed a new induction which, at the time of the audit, was still being trialled and not yet fully implemented. As such, Vestas were utilising the previous version of the overarching induction.</p> <p>Evidence that subcontractors had conducted the Site Induction was sighted for sub-contractors that were on-site on the day of the Site inspection.</p>	Compliant
4.0 Management Systems					
014	4.1	<p><u>Information Management</u></p> <p>Pacific Hydro maintains a hosted document management system which incorporates the requirements of ISO 45001 (Occupational Health and Safety Management), ISO 14001 (Environmental Management) and ISO 9001 (Quality Management).</p> <p>The management system integrates processes and procedures at the corporate, business unit and function levels and allows for the measurement and evaluation of health, safety, environment and quality performance.</p>	<p>Certificate of Registration, ISO 14001, dated 14/08/2018</p> <p>Pacific Hydro SharePoint site</p>	<p>The auditors sighted certification certificates for Pacific Hydros management systems. Project information and documentation is stored on the Pacific Hydro hosted SharePoint management system. A number of procedures were sighted but not reviewed in detail.</p>	Compliant
015	4.1	A risk management framework is provided for assessing, identifying and reducing the risks associated with the service quality and work activities that have the potential to impact the environment and cause injury or illness.	Pacific Hydro Aspects and Impacts Register, dated May 2019	<p>A site-specific Aspects/Impacts register has been developed for the site. The environment aspects/impacts register is managed by the Environment Development Team and implemented by the Regional Services Manager. The aspects/impacts register was developed in accordance with the following internal documents:</p> <ul style="list-style-type: none"> - Pacific Hydro's Risk Management Policy - Pacific Hydro's Risk Management Framework – Risk Management Process - HSE Standard 3 – Risk Management 	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
016	4.1	The management system allows for record keeping of complete, legible, identifiable, traceable and signed approved forms, 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.	Taralga Public Website Pacific Hydro SharePoint site	Pacific Hydro is certified to ISO 9001 – Quality Management System and maintains its record management in accordance with its quality management system. Records including inspections, monitoring results and complaints relating to operations were available for review on the Pacific Hydro SharePoint site. Vestas records are maintained on the Vestas internal intranet. All files are stored electronically and generally not removed / deleted after 4 years. The TWF public website makes available a number of records and documents including the sites community Complaints and enquiries registers which date back to 2012.	Compliant
017	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: <ul style="list-style-type: none"> • 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. 	Pacific Hydro SharePoint site	Documents were sighted to be filed either in hard copy and /or electronically.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
018	4.2	<p><u>Environmental Reporting</u></p> <p>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 recorded in the PH Environmental Compliance Register.</p> <p>Subject to confidentiality, the reports will be made publicly available on the Taralga Wind Farm website following approval by the DPE or issuing to the relevant government agency, as per Condition 9.</p>	TWF Public Website	<p>Condition 9 of the Development Consent states that all relevant documents, with the exception of any confidential information, required under the consent, as identified in Schedule 3 of the Consent, are to be made publicly available. The documents required by Schedule 3 include the following:</p> <ul style="list-style-type: none"> - Pre-Construction Compliance Report - Pre-Operation Compliance Report - Construction Compliance Report* - Construction Environmental impact Audit Report - Operation Environmental impact Audit Report - Construction Environmental Management Plan - Operational Environmental Management Plan* - Complaints Register* - Community Information Plan - Construction Noise and Vibration Management Sub Plan (part of the CEMP) - Operation Noise and Vibration Management Sub Plan (part of the OEMP) - Results from noise compliance programs / noise compliance reports* - Construction Traffic Management Plan (part of the CEMP) - Construction Flora and Fauna Management sub plan (part of the CEMP) - Biological survey (Natural Temperate Grassland and the orchid, <i>Diurus aequalis</i>) - Survey (Tablelands Basalt Forest Endangered Ecological Community) - Survey (Striped Legless Lizard and Grassland Earless Dragon) - Operation Flora and Fauna Management Sub Plan (Section 6 of the OEMP)* - Bird and Bat Adaptive Management Program (Appendix H of the OEMP)* - Riparian Vegetation Management Sub Plan (part of the CEMP) - Soil and Water Management Sub Plan (part of the CEMP and Section 5 of the OEMP)* <p>The auditors conducted a review of the TWF public website. Documents available on the website have been highlighted from the list above. Not all required documents were made publicly available at the time of the audit.</p> <p>Pacific Hydro have not been able to obtain historical documents such as the pre-construction compliance report due to the multiple stakeholders who have held ownership of the TWF.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 02 – Pacific Hydro to ensure that accessible documentation is made publicly available in accordance with Development Consent Condition 9. Where historical documents are not available Pacific Hydro is to consult with DPIE and provide justification why these documents cannot be obtained. Pacific Hydro should seek confirmation from the DPIE that historical documents are no longer required to be made publicly available.</p>
019	4.3	<p><u>WTG Operations</u></p> <p>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.</p> <p>Pacific Hydro 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.</p>	Interview with Pacific Hydro	<p>Condition 117 of the Project Approval had not been triggered at the time of the Site inspection.</p> <p>The Asset Manager reported that Vestas provides monthly reports on Wind Turbine Generator (WTG) performance.</p> <p>Site management reported that the Secretary has not requested these records during the audit period.</p>	Not Triggered

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020	4.4	<u>Compliance Management</u> An Approvals Compliance Register is maintained which lists all the relevant legislation and regulations that are applicable to the Wind Farm. The Conditions of Consent relevant to the OEMP can be found in Appendix B. A full list of the legal and regulatory requirements is provided in Appendix C.	Compliance Register (PHA.ENV.REG.003)	A Compliance Register PHA.ENV.REG.003 has been developed and was maintained by the Environment Development Team.	Compliant
021	4.4	The Approvals Compliance Register is reviewed on a regular basis as part of Pacific Hydro's internal auditing review process.	Compliance Register (PHA.ENV.REG.003) Interview with Environmental Compliance Officer Taralga Wind Farm Environmental Compliance Reports, Molino Stewart Pty Ltd, (August 2017 and August 2019)	The compliance register is routinely reviewed and updated by the Environment Development Team. The compliance register references all Pacific Hydro sites including TWF. The Taralga compliance internal audit is conducted as part of the Annual Lenders Audit conducted by the ER. The Taralga Wind Farm Environmental Compliance Reports, November 2017 and 2019 (Molino Stewart Pty Ltd) were 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.	Compliant

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022	4.5	<p><u>Risk Management</u></p> <p>Pacific Hydro's HSEQ MS contains a Risk Management Assessment Procedure applicable to the Wind Farm Risks associated with Wind Farm operation are reviewed as required based on events or legislative changes.</p> <p>Risks that relate to environmental issues are detailed in Pacific Hydro's Environmental Impacts and Aspects Risk Register for Taralga Wind Farm. This document is a management system document subject to regular updates.</p>	<p>Risk Management Assessment Procedure – PHA.HSE.03.001, July 2018</p> <p>Hazard Identification, Risk Management and Control Procedure PHA.HSE.10.001, July 2018</p> <p>Aspects and Impacts Register, May 2019</p>	<p>The auditors sighted the sites Impacts and Aspects Register.</p> <p>Pacific Hydro operates an environmental management system which is certified to ISO 14001.</p> <p>TWF maintains an Impacts and Aspects Register which was originally developed in 2016. The register is maintained as a live document by the Environment and Development Team. The Aspects and Impacts Register was developed in accordance with the Pacific Hydro Australian HSE Procedure PHA.HSE.03.001 – Risk Management Procedure.</p> <p>The Impacts and Aspects Register is assessed as part of the annual surveillance audits and three yearly re-certification audits, conducted by BSI.</p>	Compliant
023	4.6	<p><u>Training and Induction</u></p> <p>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 provided in three parts as outlined in Section 4.6.</p>	<p>Visitor Induction – provided to auditors on 29/10/2019</p> <p>General Induction (VESTAS)</p> <p>Induction Register (VESTAS)</p> <p>Interviews with VESTAS</p> <p>Interviews with Pacific Hydro</p>	<p>Induction</p> <p>The Site has developed an Environmental Induction which is included within the comprehensive Vesta Contractor Induction given by Vestas to staff, subcontractors and consultants.</p> <p>Vestas has in place a new levelled induction which delivers the required level of detail for the work being conducted on site. This includes:</p> <ul style="list-style-type: none"> - Visitor Induction - General Work Induction - High Voltage access induction - Wind turbine induction <p>At the time of the audit this visitor induction was being trialled and was not yet fully implemented. As such, Vestas was utilising the previous version of the overarching induction.</p> <p>Evidence that subcontractors had conducted the Site Induction was sighted for sub-contractors that were on-site on the day of the Site inspection.</p> <p>Training</p> <p>Vestas manages contractors on site and had engaged external provider CM3 to conduct pre-qualification reviews on all contractors managed by Vestas.</p> <p>Pacific Hydro has in place a pre-qualification process for all contractors it engages.</p>	<p>Compliant</p> <p>2019 OEIA OFI 02 – Update section 4.6.1 of the OEMP to refer to the new induction process.</p>
024	4.6	<p>In addition to the Site Induction and Monthly Safety Meetings, Job Pre-Start discussions, will be undertaken prior to high risk activities. A Job Pre-Start discussion 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</p>	<p>Vestas Safety Alert Pre-start, dated 24.10.2019</p> <p>TWF Daily Work Plan, dated 25.10.2019</p>	<p>High risk work conducted on site includes:</p> <ul style="list-style-type: none"> - Working at heights; - Forklift operation; and - Electrical work. <p>Vestas conducts a Daily Pre-Start meeting which includes general safety information, wind forecast, fire risk, recent incidents, safety alerts, hazard observations and issues to raise (sighted examples from 24 October 2019)</p> <p>Once per month Vestas conducts a more detailed Monthly Toolbox.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
025	4.6	Where additional training is required it will be specified within a training matrix and recorded in the training register. Additional training may include spill kit use, chemical handling, bird and bat handling (if required), driver training etc.	Vestas Training Register	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
026	4.7	<p>In the first instance all incidents will be reported to Vestas as the site Operator as per the Vestas management system. Vestas is required to report all incidents to Pacific Hydro.</p> <p>Pacific Hydro has an Incident Reporting and Investigation Procedure to ensure compliance with Pacific Hydro standards and regulatory requirements relating to the reporting, case management, investigation and implementation of corrective actions.</p> <p>Pacific Hydro uses a specialist incident reporting system (Intelix) to record and manage environmental incidents. All incidents are recorded into this system once reported to the Regional Services Manager.</p>	<p>Incident Reporting and Investigation Procedure, Pacific Hydro PHA.HSE.03.001, July 2018</p> <p>Environment Incident Procedure PHA.ENV.PRO.003</p> <p>Extract of incidents from Intelix during the audit period</p>	<p>Incidents are reported into Pacific Hydro's incident management system 'Intelix'. The system has been in place since early August 2017. Prior to this a different system was used. The Intelix system was demonstrated to the auditors during the site inspection.</p> <p>The Environment and Development Team has developed an additional environment Incident Reporting and Investigation Procedure (PHA HSE.03.001) which is not referenced in the OEMP.</p> <p>Vestas reports incidents in its system Cr360. Vestas has a contractual requirement to notify Pacific Hydro of all incidents which have occurred. Serious incidents are notified immediately. A summary of incidents (including environmental) is provided to Pacific Hydro as part of the Monthly Customer Report.</p>	<p>Compliant</p> <p>2019 OEIA OFI 03 – Ensure the OEMP refers to the new environment and incident reporting procedure.</p>
027	4.7	The incident reporting system 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.	Extract of incidents from Intelix during the audit period	<p>The functionality of Intelix was demonstrated during the Site inspection. Intelix includes sections for recording incident details, reporting investigations, assigning corrective actions, approvals and incident closure reports. Intelix also allows for task tracking and escalation with notifications sent to the responsible personnel.</p> <p>An extract of incidents recorded during the audit period was provided to the auditors for review. The register included 12 incidents which occurred between 31/08/2017 and 17/09/2019. Of the 12 incidents recorded 3 were environmental related. This included two instances of bird strikes and one instance of erosion and sediment controls failing.</p> <p>Based on the information provided there were 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.</p> <p>The auditors reviewed the Bird and Bat survey results which was conducted in December 2017. During the survey a wedge-tailed eagle carcass was identified. The identification was not recorded as an incident until 9 May 2018 when the surveyors report was reviewed by Pacific Hydro. This was followed up with the surveyor.</p>	Compliant
028	4.8	<p><u>Complaints</u></p> <p>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.</p>		<p>The notice board at the Taralga Village post office was not inspected by the auditors.</p> <p>The email address, postal address and telephone number for complaints are available on the Wind Farm website.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
029	4.8	All complaints, including those regarding environmental matters, are recorded in the <i>Complaints Register</i> . This register is maintained as an online database and a redacted copy of the database is uploaded to the Wind Farm website on a regular basis for public viewing	Complaints register Jan 2019 – May 2019 Complaints Register Sep 2016 – Jan 2019 Public Website	<p>The Pacific Hydro Community Engagement Team manage all complaints. Complaints are recorded in the Pacific Hydro SharePoint system. A PDF of the complaints register for each year is provided on the public website.</p> <p>The 2019 Lenders audit report found evidence that the redacted copy of the complaints database, made available on the public website, was not being kept up to date when compared to the complaints and enquiries register kept by Pacific Hydro.</p> <p>The auditors were not provided a copy of the complaints and enquiries register kept by Pacific Hydro and as such cannot verify the findings of the 2019 Lenders Audit.</p>	<p>Not Verified</p> <p>2019 OEIA OFI 04: The complaints and enquiries register kept by Pacific Hydro must be readily available and consistent with the redacted complaints register published on the TWF website.</p>

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
030	4.8	The <i>Complaints Register</i> will be maintained by the Engagement and External Affairs 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.	Complaints register SharePoint – complaint report examples Interviews with Pacific Hydro Engagement and Land Management Coordinator	<p>The Complaints and Enquires Register was being maintained by the Community Engagement Team. This team is responsible for responding to complaints with assistance from other staff members where required. It was reported that the ER is notified of any serious complaints or matters which may result in multiple complaints being received. In some cases during the audit period the ER received enquiries or general complaints directly. Any enquiries or complaints received by the ER are directed to TWF immediately.</p> <p>The ER conducted an internal audit at TWF in 2019. The Report identified a non-compliance which related to the ER not being informed of all complaints received by the site. The report stated that the ER was not informed of some complaints received between April – June 2019. As per Development Consent Condition 27, the ER has responsibilities relating to receiving and responding to complaints.</p> <p>The auditors interviewed Pacific Hydro's Engagement and Land Management Coordinator and interrogated Pacific Hydro's SharePoint site which includes a list of all incidents and enquiries received.</p> <p>The Complaints and Enquires Register was noted to include: date, time, type (complaint / enquiry), complainant details (name, address, phone, email), method (phone, email), issue category, detailed summary, detailed response / action and status. Following the previous audit finding an additional column detailing the complaint category (e.g. visual, TV transmission etc.) was added to the complaints register. The public Complaints Register included date, time, type, issue, method, detail, response/action and status.</p> <p>A review of the complaints records indicated that the majority of complaints received related to TV coverage. The Complaints Register recorded these complaints as 'Closed' which implies that the issue had been satisfactorily resolved. A more in-depth review into individual complaints indicated that whilst Pacific Hydro has considered the complaint 'Closed', on the basis that the complainant's issues are unrelated to TWF operations, the complainant is not satisfied with the outcome. Therefore, having a public Complaints Register which indicates all complaints have been closed may not be an accurate reflection of the status of complaints and community satisfaction. Pacific Hydro may wish to consider including additional information to indicate whether the complaint has been satisfactorily resolved.</p> <p>On the basis of the ER not being notified of all complaints, this requirement has been assessed as non-compliant.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 03 – Ensure the ER is informed of all complaints received at the site. It is suggested that the complaints register identify when the ER has been involved.</p>
031	4.8	Complaints that are of a serious nature will be reported to the Operations Manager and may also be logged as an incident in Pacific Hydro's incident reporting system.	Complaints 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
032	4.8	For complaints related to operational noise from the Wind Farm, the complainant will be contacted to collect further information and the noise complaints procedure will be followed, as outlined in Section 8 of the Noise Management Plan (NMP) in Appendix D.	Complaints Register	No complaints relating to operational noise from the wind farm were recorded in the TWF Complaints Register.	Not Triggered

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
033	4.9	<p><u>Community Consultative Committee (CCC)</u></p> <p>Condition 30A requires a Community Consultative Committee (CCC) to operate for the life of the Wind Farm and in a manner generally consistent with the requirements of Appendix C: Guidelines for wind farm consultative committees, as contained in the Draft NSW Planning Guidelines - Wind Farms (Draft NSW Guidelines, December 2011).</p> <p>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 twice a year after the first two years of operations:</p>	<p>CCC Meeting Minutes, Meeting number 15. Dated 17.02.2016</p> <p>TWF CCC Terms of Reference, Dated 20.01.2014</p> <p>Email from Pacific Hydro to CCC Chair 25 Jan 2017</p> <p>Email from CCC Chair to Pacific Hydro 06 November 2017</p> <p>Lenders Audit Report 2019</p>	<p>In February 2016 the CCC agreed to reduce the frequency of meeting to annually with additional meetings to be organised on an as needed basis. The auditors were informed that the CCC has not met since the February 2016 meeting.</p> <p>The Pacific Hydro External Affairs manager attempted to contact the CCC Independent Chair to confirm the status of the CCC throughout 2017.</p> <p>An email from the CCC Independent Chair received on the 6th November 2017 identified that the CCC Independent Chair currently lives in Sydney and has no involvement with Taralga anymore.</p> <p>An email from a CCC Member on the 8 December 2017 and CCC independent Chair to Pacific Hydro stated that the <i>CCC was developed and operated during the construction phase and disbanded when the wind farm was commissioned.</i></p> <p>Condition 30A of the Development Consent requires the CCC to operate for the life of the development, unless otherwise agreed by the Secretary. At the time of the audit the CCC was not operating. Approval from the DPIE had not been obtained to cease the operation of the CCC.</p> <p>This issue was previously identified by the ER in the 2019 Lenders Audit report.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 04 - inform the DPIE that the CCC has been disbanded and seek advice regarding the future of the CCC. Approval must be obtained from the DPIE should the CCC be dissolved indefinitely.</p> <p>2019 OEIA REC 05 – Update the OEMP to reflect current community consultation practices. Also ensure that the OEMP reflects the requirements of Condition 30A of the Development Consent ,in particular that the CCC is established for the life of the Wind Farm, <i>unless otherwise agreed by the Secretary.</i></p>
034	4.9	<p>CCC meetings are organised by the Engagement and External Affairs Manager and may be attended by the Regional Services 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.</p>		As above	<p>Not Compliant</p> <p>Refer REC 04 and 05 against Referece 033</p>
035	4.10	<p><u>Inspections</u></p> <p>Regular inspections of operational activities and environmental performance will be undertaken by the Regional Services Manager. Those relevant to environmental management are:</p> <ul style="list-style-type: none"> • Animal carcasses around road sides, hardstands and culverts; • Erosion, sediment controls and containment systems (e.g. oil separators in substation); • Hazardous materials and waste; • Rehabilitated grasses and vegetation; • Safety equipment; and • Weeds; 	<p>TWF Quarterly Site Environmental Impact Inspection Reports, dated:</p> <ul style="list-style-type: none"> - Q1, Q2, Q3, Q4 2018 - Q1, Q2, Q3, Q4 2019 	<p>Quarterly inspection reports are prepared by the Regional Services Manager built up from on inspections undertaken during the quarter. The auditors sighted Quarterly Site Environmental Impact Inspection Reports from 2018 and 2019.</p> <p>The inspection reports included recorded observations relating to:</p> <ul style="list-style-type: none"> - Erosion - Site build up in drains - Infrastructure maintenance - Weed control - rehabilitation <p>The reports include inspection results for the areas inspected as well as corresponding photos against the observations made.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
036	4.10	The frequency of inspections varies from monthly to annual, depending on the risk associated with the aspect being inspected. This information is provided in the Management Controls section of the Wind Farm Environmental Impacts and Aspects Risk Register, and the Wind Farm Risk Register	TWF Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 - Q1, Q2, Q3, Q4 2019	Inspection Reports are compiled every quarter based on inspections conducted within the quarter (i.e. weekly or monthly inspections).	Compliant
037	4.10	Completed checklists will be recorded and stored electronically on Pacific Hydro's document management system. Any item identified during an inspection that requires investigation will be managed via Audit Action Register and corrective actions (Section 4.11).	Sighted FIXD System showing completed quarterly inspections (example from 1 April 2019 reviewed in detail) SAP Maintenance System sighted	Generally, actions from the quarterly inspections are not entered in the Audit Action Register. Instead, actions from the quarterly inspections are entered into Pacific Hydro's maintenance system 'FIXD'. This identifies the action as a maintenance requirement and assigns a Work Order. It was reported that, Pacific Hydro provides Vestas with a Work Order which details the issue which requires rectifying. Vestas will manage the Work Order and engage suitable contractors as required. Vestas maintain a SAP maintenance system to track work orders and maintenance requirements. Vestas SAP system is exported to Pacific Hydro and entered into FIXD.	Compliant 2019 OEIA OFI 05 – Update the OEMP to reflect current practice of managing actions from quarterly inspections through the FIXD maintenance system and not the Audit Action Register.
038	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.	TWF Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 - Q1, Q2, Q3, Q4 2019	Site management considered that the level, scope and timing of the inspections were appropriate to the activities being conducted at the Site. The auditors consider this to be appropriate.	Compliant
039	4.11	<u>Corrective Actions</u> Non-compliances, non-conformities and deficiencies identified through the compliance monitoring program for which Pacific Hydro is responsible will be recorded on the Pacific Hydro Audit Action Register and corrective actions closed out accordingly. Those which the contractor is responsible will be included within the contractor's own incident and non-compliance process. Close out of corrective actions are completed by the persons delegated and the follow up is the responsibility of the Regional Services Manager and/or the Environmental Compliance Officer	Audit Action Register PHA.ENV.REG.004	The Audit Action Register was sighted by the auditors and is the primary tool utilised to close out environmental corrective actions identified through internal and external environmental audits. The register was managed by the Environmental Compliance Officer. The auditors sighted corrective actions from the 2016, 2017 and 2018 lenders audits as well as internal audits.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
040	4.12	<p><u>Independent Audit</u></p> <p>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. If requested, the report must be provided to other relevant government agencies. This is in accordance with Condition 23 of the Conditions of Consent.</p> <p>The Operation Environmental Impact Audit Report must:</p> <ol style="list-style-type: none"> Be certified by an independent person at the Wind Farm's expense. The certifier must be approved by the DPIE prior to the preparation of the audit report; Compare the operation impacts predictions made in the EIS and documents identified in Condition 3 Assess the effectiveness of implemented mitigation measures and safeguards Assess the compliance with the systems for operation maintenance and monitoring; and Discuss the results of consultation with the local community particularly any feedback or complaints and how such complaints were addressed and resolved. <p>The DPE may, having considered the findings of the audit report, require Pacific Hydro to undertake works to address the findings or recommendations presented in the report. The result of the audit report will also be used to update the OEMP where necessary. Any significant update to the OEMP will be reviewed and certified by the ER and the DPE and relevant government agencies will be notified.</p>	Discussion with Pacific Hydro	<p>This audit has been undertaken to fulfil the requirements of Condition 23 of the Development Consent for an Operation Environmental Impact Audit (OEIA) Report. This is the second OEIA (the first conducted after 12 months of operation) and covers the period 3 November 2016 (completion of last OEIA) to 30 October 2019 (final day of 2019 OEIA site inspection).</p> <ol style="list-style-type: none"> Pacific Hydro informed the auditors that the audit team was approved by the DPIE to conduct the OEIA. Note - Letter of approval from DPIE was not provided for review. Operational impacts compared to predicted impacts are discussed in Section 5.1 of main report The effectiveness of the implemented measures is considered for the measures outlined in the OEMP as outlined in this Audit Checklist. Compliance with the OEMP is outlined in this Audit Checklist Community consultation is discussed in Section 5.3 of the main report. <p>The OEMP was revised following the previous OEIA in 2016.</p>	Compliant
041	4.13	<p><u>OEMP Review</u></p> <p>The OEMP will be reviewed when:</p> <ul style="list-style-type: none"> - There is a change in the scope of the project; - Following a significant environmental incident; - There is a need to improve the performance in an area of environmental impact; and - At the completion of environmental audits. <p>The review will be completed by members of the Pacific Hydro management structure listed in Section 3. The OEMP will be amended, as required, based on the outcomes of the review.</p>	OEMP, 5 June 2019	<p>The OEMP was reviewed and updated following the change of ownership from CWP to Pacific Hydro. This update also addressed the findings from the 2016 OEIA.</p>	Compliant
042	4.13	<p>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.</p>	<p>ER Certification of OEMP, dated 05/06/2019</p> <p>Email to DPIE notifying of OEMP update, dated 09.07.2019</p>	<p>The ER provided a letter certifying the updated OEMP on 05 June 2019. The letter stated that Pacific Hydro consulted with the ER during the review and update of the previous 2015 OEMP.</p> <p>The DPIE were notified, in July 2019, that the OEMP had been updated.</p>	Compliant

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5.0 Rehabilitation, Soil and Water Quality Management Plan					
043	5.1.1	<u>Conditions relevant to the RSWQMP</u> DPE – Conditions 31, 32, 33, 96, 97, 98, 99, 113 EPL – L1, O3, O5, M3, R2	Discussion with Pacific Hydro	<p>Table 5 within Section 5.1.1 references Conditions 31, 32 and 33 which relate to landscaping requirements. The OEMP does not discuss landscape management, as detailed in Conditions 31, 32 and 33.</p> <p>An on-site landscape management plan was developed in conjunction with the original OEMP. Following the update of the OEMP the commitments in the landscape management plan were largely complete. The relevant Development Consent Conditions were reassigned to the rehabilitation section of the OEMP however, discussion of the actual requirements and how they are being addressed is not provided .</p> <p>Condition 31 of the Project Approval requires the Landscape management plan to be implemented within 6 months of commencement of Operation and to be maintained. Item c) specifically requires that the Plan include “<i>details of the maintenance program for on-site landscaping associated with the development</i>”.</p> <p>The current OEMP does not adequately address the landscaping requirements of the Development Consent.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 06 – Ensure the OEMP addresses the requirements of the Development Consent relating to landscaping that are applicable to operations. This can be done by developing a stand-alone Landscape Management Plan to be included as an Appendix to the OEMP, as its own section within the OEMP or incorporated into Section 5 – Rehabilitation, Soil and Water Quality Management Plan of the OEMP.</p>
044	5.2	A small quantity of hazardous materials will also be maintained on-site. The identification, storage, handling and disposal of these materials are listed in the PIRMP (Appendix J). For major spills that endanger people and/or the environment, the emergency response in the PIRMP (Appendix J) will be followed.	PIRMP Incident Register Site inspection	<p>The PIRMP is included in Appendix J of the OEMP and details an inventory of chemicals and materials in section 3.1. No major spills had been recorded during the audit period which would trigger the PIRMP to be activated.</p> <p>An oil spill kit was observed in the workshop at the time of the Site inspection.</p>	Compliant
045	5.3	<u>Risk Management and Control</u> The two areas impacted by stock management (The steep sided embankment of the hardstand of turbine 49 and the west side of the track, midway, on approach to turbine 31) are currently being monitored for rehabilitation and fencing requirements. Otherwise, erosion and sediment controls will be decommissioned in a manner that does not cause ongoing soil erosion or environmental harm but only if rehabilitation has been achieved as per the targets in Table 7	Site Inspection Interviews with site personnel TWF Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 Q1, Q2, Q3, Q4 2019	<p>Pacific Hydro has engaged Vestas to manage Hydro Mulching and installation of a fence around the embankments near Turbines 49 and 31.</p> <p>Monitoring of the rehabilitation of these sections is conducted in the quarterly inspections conducted by the Regional Services Manager.</p> <p>Temporary fences were installed in 2017 at high erosion hazard areas near WTG 49 and on track 10. The auditors observed during the audit site inspection that some fences had been damaged due to weather, stock or farming practices.</p> <p>Some sediment and erosion controls which were in place during construction, such as rock check dams and sediment traps, remained in place due to a lack of established rehabilitation. The site noted that these measures would remain in place to ensure adequate ground stabilisation and sediment capture until the site is fully remediated.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
046	5.4	<u>Measurable Targets</u> Continual rehabilitation of: <ul style="list-style-type: none"> - disturbed areas between T20-T27 rehabilitated to at least 50% ground cover - disturbed areas everywhere else rehabilitated to at least 70% ground cover 	Site Inspection Interviews with Pacific Hydro Lenders Audit 2019 TWF Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 Q1, Q2, Q3, Q4 2019	<p>The 2016 OEIA identified areas on site where unsuccessful rehabilitation had occurred. The 2016 OEIA report recommended that a specialist rehabilitation consultant be engaged to review the re-seeding options for the ridge line (i.e. between WTG20 and WTG31). The site inspection for this area indicated some areas whether the native bushland was starting to colonise the rehabilitated area, in particular near TPG 24, 25 and 26. Ground cover was observed to include lead litter, bark and rock (refer photos in main report).</p> <p>The auditors were informed that a number of rehabilitation techniques such as re-seeding, were attempted during the audit period however due to the regional weather conditions and stock on site most rehabilitation success had been limited.</p> <p>Rock lining was placed in drains which run along track 11 to assist with ground stabilisation. In addition, a number of areas have been identified as requiring further stabilisation work and fencing installed to prevent erosion and assist ongoing rehabilitation efforts.</p> <p>There was no formal system in place to measure % ground cover. This target was used to provide a high-level estimate of success.</p> <p>The Quarterly inspection reports review rehabilitation success and identify areas that require further work however do not specifically measure against this target.</p>	Not Verified 2019 OEIA OFI 06 – Consider how success against this target will be measured
047	5.4	<u>Measurable Targets</u> All quarterly environmental site inspections undertaken	TWF Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 - Q1, Q2, Q3, Q4 2019	<p>Quarterly Site Environmental Impact Inspection Reports are prepared by the Regional Services Manager built up from inspections undertaken during the quarter. The auditors sighted Quarterly Site Environmental Impact Inspection Reports from 2018 and 2019.</p> <p>The inspection reports included recorded observations relating to:</p> <ul style="list-style-type: none"> - Erosion - Site build up in drains - Infrastructure maintenance - Weed control - rehabilitation <p>The reports include inspection results for the areas inspected as well as corresponding photos against the observations made.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
048	5.4	<u>Measurable Targets</u> Prevention of erosion damage to the drainage system	Site Inspection TAW Quarterly Site Environmental Impact Inspection Reports, dated: - Q1, Q2, Q3, Q4 2018 Q1, Q2, Q3, Q4 2019	The auditors identified the following during the audit site inspection: <ul style="list-style-type: none"> - Stock on site is the main contributor to erosion damage along with steep slopes and regional weather conditions. - Rock lining is in place in drainage channels to increase ground stabilisation and to prevent stock from accessing drainage lines. - Rock check dams have been installed and designed in a 'V' configuration to prevent erosion caused by overflow of water. - Pacific Hydro has been actively consulting with landowners regarding erosion controls and the impacts of stock across the site. Additional controls such as fencing have been considered following identification of impacts caused by stock to the drainage system. - Evidence of erosion and sedimentation was observed across the site. These areas were known to site personnel who were actively implementing additional controls to manage erosion risks across the site. Ongoing monitoring of erosion controls is conducted during the environmental site inspections.	Compliant
049	5.4	<u>Measurable Targets</u> Prevention of sediment flow off Site	Site Inspection Incident Register Incident detail for July 2019 sediment incident, Intelx (incident No 308)	Once incident was recorded in July 2019 which related to sediment flowing offsite. During and environmental audit conducted by Pacific Hydro the auditors identified erosion and offsite transport of erosion at TWF. Pacific Hydro engaged Vestas to commission contractor Divalls to install new rockliner in the drain to prevent further offsite transport of sediment flow. The incident report states that the release did not exceed the reportable quantities, caused no material harm to the environment and was not required to be reported to external agencies under the POEO Act. A follow up inspection was conducted in October 2019 to verify the new rock erosion controls had been installed. The auditors sighted that remedial works had been undertaken and were observed during the audit site inspection (refer photos in main report). Pacific Hydro have actions to ensure continual monitoring of the area is conducted to determine the effectiveness of the implemented controls. As such, the auditors have not applied a recommendation to this finding.	Non-compliant
050	5.4	<u>Measurable Targets</u> No complaints recorded of excessive dust emissions during operations	Complaints Register	Review of complaints register identified that no complaints were received during the audit period relating to dust emissions.	Compliant
051	5.4	<u>Measurable Targets</u> Utilisation and maintenance of erosion or sediment control in accordance with drawings in Appendix E	Site inspection	Erosion and sediment controls in place were generally consistent with the drawings and information provided in Appendix E. This included: <ul style="list-style-type: none"> - Energy Dissipater at discharge pipe outlets - Sediment traps - Rock checks - Rock lined drainage channels - Sediment basin located next to the O&M compound. Arrangement of access tracks	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
052	5.4	<u>Measurable Targets</u> Temporary erosion and sediment controls removed after rehabilitation works have been completed on more than 90% of the contributing catchment	Site Inspection Interview with Pacific Hydro	Interviews with Pacific Hydro staff and site inspection indicated that the majority of temporary controls had been removed at the time of the audit.	Compliant
053	5.4	<u>Measurable Targets</u> All hazardous materials stored and used in accordance with the relevant SDS	Site Inspection	Hazardous chemicals were sighted on site on banded pallets and in suitable flammable liquids cabinets and containers. No issues were identified with regards to the storage of hazardous material with the exception of the storage of waste batteries which failed to have adequate spill containment in place. Refer Condition 075 for recommendations relating to waste batteries.	Compliant Refer 2019 OEIA OFI 14
6 NOISE MANAGEMENT – Refer to Noise Management Plan (Appendix D)					
054	6.1.1	This Noise Management section summarises the noise and vibration impacts and controls discussed in the Noise Management plan (NMP) (Appendix D) that may result from operation of the Taralga Wind Farm.	Taralga Wind Farm Noise Management Plan, 160218_TWF_OEMP-RevF, dated 18.02.2016	The Noise Management Plan is not included in Appendix D and is not available on the public website. The Noise Management Plan referred to is the 2016 CWP Noise Management Plan. This plan was provided to the auditors.	Not Compliant 2019 OEIA REC 07 – Update the Noise Management Plan to be a Pacific Hydro document and make available on the TWF website.
055	6.1.1	In general for complaints related to operational noise from the Wind Farm, the complainant will be contacted to collect further information and the noise complaints procedure will be followed, as outlined in Section 8 of the NMP in Appendix D.	Complaints Register	Review of complaints register identified that no complaints were received during the audit period relating to noise.	Not Triggered
056	6.4	Noise Controls <ul style="list-style-type: none"> Noise compliance testing; Noise complaint procedure; WTG maintenance; Guaranteed maximum sound power levels and tonality performance; Noise ameliorative measures; Substation maintenance; Standard working hours; and Speed restriction. 	Environmental Noise Compliance Report, Sonus Pty Ltd, November 2015 Environmental Noise Compliance Report, Sonus Pty Ltd, 2016 NSW Wind Farm Noise Guideline Vestas SAP – Changed scheduled service order 55822809, dated 30.10.2019 Vestas monthly service report, Service Order 55823083, dated 29.10.2019 Complaints Register (2016-2019)	Noise Compliance Testing Noise monitoring was conducted in 2015 and 2016 to determine compliance with noise limits specified in the Development Consent and EPL. This included measurements for the presence of excessive tonality and low frequency. The testing did not detect tonality for any of the turbine types and also found that there was no low frequency noise. The noise compliance testing confirmed that the TWF complies with the Development Consent Conditions and EPL. The Noise Management Plan (NMP) outlines that additional noise compliance testing will be conducted in the event of a noise complaint which DPIE considers to be valid. Table 9 of the OEMP outlines the Noise Measurable Targets for TWF. Table 9 states that the measurement for noise targets is noise compliance testing. As per the NMP ongoing noise compliance testing is not conducted. The NMP provides a detailed breakdown of the noise monitoring methodology however is not descriptive about when monitoring is to be conducted to ensure continued compliance with the WTG noise and tonality criteria. The NMP suggests that ongoing compliance testing will be conducted to ensure compliance with Noise Measurable Targets. As ongoing noise monitoring is not required the auditors have made an OFI for this to be clarified in the NMP. No complaints related to noise had been received and therefore additional noise testing in response to complaints had not been required.	Compliant 2019 OEIA OFI 07 – It is recommended that the Noise Management Plan (NMP) be updated to clarify that all noise compliance testing has been conducted in the past and is not a required ongoing compliance measure. Table 9 should specifically refer to past noise compliance testing.

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
				<p>It was reported that there had been no changes to the operation of WTF since the initial noise testing was conducted in 2015 and 2016. There has been no verification that TWF continues to comply with the noise criteria specified in the EPL and Development Consent since 2016.</p> <p>Noise Compliant Procedure</p> <p>As no complaints relating to noise had been received, the noise complaint procedure had not been triggered.</p> <p>WTG Maintenance</p> <p>Routine maintenance of the wind turbines is conducted by Vestas. Vestas provides a 6 monthly service and maintenance report to Pacific Hydro. Vestas utilise the SAP system to track and record scheduled maintenance activities. Maintenance and servicing is reportedly conducted in accordance with the requirements stipulated in the maintenance manual provided by the manufacturer. The maintenance manual includes a service checklist for each task and allows the service technician to follow the requirements outlined in the checklist.</p> <p>Vestas provide a summary of all service and maintenance conducted each month to Pacific Hydro. The auditors sighted evidence of monthly service reports provided to Pacific Hydro which outlined every task conducted for the month.</p> <p>Maximum sound power levels and tonality performance</p> <p>It was reported that the sound power level of the turbine could be impacted by the output of the turbine. However changing the turbine output is a very detailed process as TWF must comply with technical performance standards. It was reported that there had been no changes to the output of the turbines during the audit period.</p> <p>Tonality was assessed during the initial noise compliance testing and was not detected.</p> <p>Noise ameliorative measures</p> <p>Noise ameliorative measures listed in Condition 49 of the Development Consent had not been triggered during the audit period</p> <p>Substation Maintenance</p> <p>Substation maintenance is conducted quarterly and reported quarterly.</p> <p>The noise compliance testing undertaken in 2015 stated that <i>“no assessment of noise from the substation has been conducted as the closest non-associated dwelling is approximately 2.8km from the substation. At this distance the noise from the substation would be inaudible and therefore the assessment is not relevant.”</i>. There had been non changes to the substation that would alter the findings of this noise assessment.</p> <p>Standard Working Hours</p> <p>Interviews conducted with Pacific Hydro staff indicated that work is generally conducted within the hours specific in Section 1.3 of the sites OEMP. On occasion however work is conducted on site post 1pm on Saturday and Sundays. The type of work conducted outside of the prescribed hours is generally turbine breakdown maintenance and</p>	

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
				<p>service work. No noise creating work, i.e. use of hydraulic pumps, is reportedly conducted during these hours of work.</p> <p>Speed Restrictions</p> <p>Speed restriction signage was sighted at the service compound. In addition, speed restrictions are detailed in the site's induction.</p>	
7 FLORA AND FAUNA MANAGEMENT PLAN					
057	7.5	<p><u>Measurable Targets</u></p> <p>No unapproved removal or disturbance of native flora and fauna</p>	<p>Site Inspection</p> <p>Interviews with Pacific Hydro</p> <p>Lenders Audits 2017, 2018 and 2019</p> <p>Environmental Quarterly Inspection Reports 2018 and 2019</p> <p>Complaints register</p> <p>Pacific Hydro Incident Register</p>	<p>Based on incidents and complaints recorded during the audit period as well as the results detailed in environmental inspection reports no instances of unapproved removal or disturbance of native flora and fauna were identified to have occurred during the audit period.</p>	Compliant
058		<p><u>Measurable Targets</u></p> <p>No new or increase in weed infestations within the TWF EPL area (known weeds are identified in Appendix G – Weed Identification Table)</p>	<p>Lenders Audit, 2019</p> <p>Site Inspection</p>	<p>Pacific Hydro reimburses landowners for the cost of herbicide used for weed management on their properties. Pacific Hydro undertakes weed management activities such as spot reduction should weeds be identified in areas not maintained by landholders.</p> <p>The auditors conducted a site inspection of the TWF. Blackberry was identified in varying density across the site. Blackberry has been identified as an issue by TWF during quarterly inspections as well as by the ER during the annual Lenders audits. Pacific Hydro has an action to conduct additional rectification works for the Blackberry across site.</p> <p>The OEMP requires vehicle and plant inspections to be conducted to reduce the likelihood of the spread of weeds on site. The auditors were not able to verify if these inspections were being conducted. The 2019 Lenders Audit conducted by the ER identified that the Vestas Plant Acceptance Checks were not being completed.</p>	<p>Compliant</p> <p>2019 OEIA OFI 08 –</p> <p>Vehicle inspections conducted in accordance with Vestas Plant Acceptance Checks form should be conducted and recorded.</p>
059		<p><u>Measurable Targets</u></p> <p>No access off Site roads and hardstands without Pacific Hydro approval</p>	<p>Site Induction</p> <p>Interviews with site personnel</p>	<p>The site induction outlines the approved trails and tracks which personnel are permitted to access. Access off these routes requires additional approvals from Pacific Hydro.</p> <p>It was reported that there had been only one instance in the audit period which required access off the approved site roads and hardstands. This related to contractors measuring wind speeds. To access these areas the contractor required an additional approval. To issue the permit Pacific Hydro must consult with the landowner and be granted approval, review the activity and assess risk to safety and the environment. A check of the contractor's vehicle is also conducted when they arrive onsite.</p>	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
8 HERITAGE MANAGEMENT PLAN					
060	8.3	It is not expected that there would be any interaction with known cultural sites as part of the day to day operation of the Wind Farm. However, care is required to avoid any disturbance to the sites listed above and for any other area when undertaking road maintenance and excavation.	Site Inspection Incident Register Interviews with Pacific Hydro	Interviews with Pacific hydro indicated that there had not been any disturbance to known cultural sites during the audit period. The known cultural sites were not located in areas impacted by maintenance activities. There had been no new breaking-ground activities during the audit period.	Compliant
061	8.3	The Site induction will include heritage information to facilitate awareness of heritage values associated with the Wind Farm and for all new breaking-ground activities the Environment and Development Manager will first be notified before any breaking-ground works commence.	Site Induction	The environmental induction states <i>“For any incident, spill or <u>unexpected find</u> that occurs onsite, the following applies:</i> <ol style="list-style-type: none"> 1. <i>Immediate action/contain</i> 2. <i>Report</i> 3. <i>Investigate</i> 4. <i>Remedial works</i> 5. <i>Close out</i>“ <p>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).</p> <p>It was reported that the new induction, which was in the process of being trialled at the time of the audit, will include reference to environmentally sensitive areas (including heritage).</p> <p>No new breaking-ground works had occurred during the audit period.</p>	Compliant 2019 OEIA OFI 09 – Include additional heritage information within the new site induction to facilitate awareness of heritage values associated with the TWF and ensure everyone is aware of the process for any for any breaking-ground works.
062	8.4	In the unexpected occurrence of discovery of a heritage item work will stop and advice will be sought from NSW Heritage Council and the procedures in the archived Construction Heritage Management Plan followed.	Site Inspection Incident Register Interviews with Pacific Hydro	Interviews with Pacific hydro indicated that this had not occurred during the audit period.	Not Triggered
063	8.5	<u>Measurable Targets</u> No accidental damage to cultural heritage sites or artefacts	Site Inspection Incident Register Interviews with Pacific Hydro	No damage has been recorded to heritage sites or artefacts.	Compliant
064	8.5	<u>Measurable Targets</u> No access to cultural heritage sites without Pacific Hydro approval	Site Induction	The site induction identifies accessible areas across the site. The environmentally sensitive and heritage areas are excluded as accessible areas. Access to areas which are outside of the accessible areas requires a permit approval provided by Pacific Hydro.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations																
9 TRAFFIC MANAGEMENT PLAN																					
065	9.1	In the event that major repairs that require larger cranes and trucks to be brought onto site, a task specific Traffic Management Plan may be required.	Interviews with site personnel	<p>Large crane movements required for gear box removal have been required in three instances during the audit period. The auditors were informed that an oversized vehicles traffic management plan was in place however the cranes did not trigger a task specific traffic management plan to be developed.</p> <p>The site reported that a task specific traffic management plan is required if the controls outlined in the overarching traffic management plan do not adequately control the risks associated with the task specific truck movement. This is not made clear in the OEMP.</p>	Compliant 2019 OEIA OFI 10 – Update section 9.1 of the OEMP to make it clearer when a task specific Traffic Management Plan would be required.																
066	9.2	<p><u>Traffic Volume</u></p> <p>The following vehicles are expected to be travelling to and from the Wind Farm during the operational phase:</p> <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 / month</td></tr><tr><td>Franna crane</td><td>1 / year</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>1 / quarter</td></tr><tr><td>Certified waste truck</td><td>1 / quarter</td></tr></table>	Vehicle Type	Number of Movements	Light vehicle	38 / week	Delivery truck (semi-trailer / tray back)	2 / month	Franna crane	1 / year	Hydraulic boom crane	1 / year (with 2 escort trucks)	Lattice boom crane	1 / year (with 15-20 truck movements)	Garbage truck	1 / quarter	Certified waste truck	1 / quarter	Interviews with site personnel	<p>Site management reported that traffic data is not recorded by the TWF but was able to confirm that the predictions stated Section 9.2.1 of the OEMP were generally accurate.</p> <p>During the Site inspection Vesta and Pacific Hydro 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.</p>	Compliant
Vehicle Type	Number of Movements																				
Light vehicle	38 / week																				
Delivery truck (semi-trailer / tray back)	2 / month																				
Franna crane	1 / year																				
Hydraulic boom crane	1 / year (with 2 escort trucks)																				
Lattice boom crane	1 / year (with 15-20 truck movements)																				
Garbage truck	1 / quarter																				
Certified waste truck	1 / quarter																				
067	9.2	<p><u>Oversize / Over-mass Vehicles</u></p> <p>In the event of major repairs requiring the replacement of a WTG blade, hub, tower or nacelle, it will be necessary for oversized/over-mass vehicles to access the Wind Farm and these vehicles will require a permit from RMS.</p> <p>Oversize/over-mass vehicles will be used on rare occasions and only for unscheduled maintenance of WTGs.</p>	<p>Site Inspection</p> <p>Interviews with site personnel</p> <p>ER Lenders Audit Report, TWF, Molino Steward, August 2019</p>	<p>The 2019 Lenders Audit conducted by the sites Environmental Representative identified that over-mass vehicles were required on site however permits could not be reviewed.</p> <p>The site could not provide evidence of over-mass / oversize permits being issued by NSW RMS relating to the audit period.</p>	Not Compliant Refer to 2019 OEIA REC 01 (Audit Ref # 4)																

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
068	9.2	<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: <ul style="list-style-type: none"> • Service related vehicles: <ul style="list-style-type: none"> - 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. 	Interviews with site personnel Complaints Register (2016-2019)	Site management reported that access to the Site was generally conducted within the times specified in Section 9.2.3 of the OEMP. Occasionally Vestas contractors required access to site after 1pm on Saturday. A review of the Complaints and Enquires Register did not include any traffic related complaints concerning access times.	Compliant
069	9.2	<u>Public Road Usage</u> 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 Creeks Road and are shown on the Site Plan.	Site Inspection Interviews with site personnel	During the site inspection it was noted that access to the Site was via either Bannaby Road, Old Showground Road or Alders and Creeks Road, and that there were no other local roads with access to the Site. The main site access was via Bannaby Road (EP3) at the time of the audit. The auditors were informed that in the near future the main access to the site would be via Old Showground Road (EP2).	Compliant
070	9.2	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 I. 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).		Contractors are made aware of the transport routes as part of the induction process.	Compliant
071	9.2	All oversize heavy construction vehicles shall only use the route identified in Figure 2 of Modification 6 (Appendix I).	Pacific Hydro / Vestas induction	Contractors are made aware of the transport routes as part of the induction process.	Compliant
072	9.2	<u>Wind Farm Access Points</u> Permanent access points for the Wind Farm are shown on the Site Plan in Appendix A and listed in the table below: <ul style="list-style-type: none"> • 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 	Site Inspection	The auditors sighted EP2, EP3, EP4 and EP5 during the Site inspection.	Compliant
073	9.4	<u>Measurable Targets</u> All traffic complaints and incidents investigated, as required	Complaints Register (2016-2019) Incident Register (Sep 2017-Sep 2019)	Review of complaints register identified that no complaints were received during the audit period in relation to traffic. One incident was recorded in September 2018 relating to a heavy vehicle that was transporting a boom crane to the TWF. The vehicle lost stability and rolled over on an arterial road north of Goulburn. The incident was investigated and the status in the Incident Register marked as closed.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
10 WASTE MANAGEMENT PLAN					
074	10.4	<u>Waste Measurable Targets</u> Waste classified and managed in accordance with the relevant guidelines	Waste manifest, Cleanaway, dated 14.10.2019 Site Inspection	Vestas has engaged Cleanaway as the waste contractor on site to remove prescribed waste such as fuels, solvents, contaminated waste and greasy and oily rags from site and provide waste receipts for record keeping. The auditors sighted the Cleanaway waste manifest and waste receipts for oil filters from Cleanaway. The Waste Transport Certificates for the transport and disposal of trackable waste (including waste oils and waste oil / water, hydrocarbon / water mixtures) were not available for review.	Compliant 2019 OEIA OFI 11 – Ensure that Transport Certificates are maintained for all hazardous material transported from site. . 2019 OEIA OFI 12 - Update the OEMP to include further detail / guidance on the waste tracking process for hazardous waste and the responsibilities of waste producers under the Protection of the Environment Operations OEO (Waste) Regulation 2014. 2019 OEIA OFI 13 - Consider developing a Waste Register to document the waste type, volume, date picked up, transporter, destination and whether the waste was recycled or disposed. This would assist in tracking waste, ensuring it is appropriately disposed and reporting against any corporate sustainability targets.
075	10.4	<u>Waste Measurable Targets</u> All controlled waste handled and disposed of as per the SDS of each material	Discussion with Pacific Hydro	Hazardous and prescribed waste was disposed of by a licenced waste contractor, Cleanaway, in accordance with EPA requirements.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
076	10.4	<u>Waste Measurable Targets</u> Any waste not correctly stored or managed on-site addressed promptly	Discussion with Pacific Hydro Site Inspection	The site inspection identified the following: <ul style="list-style-type: none"> - Within the service compound a range of waste classes are stored including; general, gas bottles, recycling, oil, scrap metal, batteries, and greasy and oily rags. - Tutt Bryan has been engaged to remove other classes of waste from site. General waste was transferred to Goulburn landfill. - Separate waste receptacles at the O&M compound were available for waste separation. The auditors observed co-mingling of waste classes on site at the time of the audit site inspection. Non-recyclable material was placed in the recycling bin and general waste was sighted in the scrap metal bin. - Waste batteries were stored on a wooden pallet outside. The batteries were not covered and were located on a gravel/dirt surface. - Hazardous waste storage was located in purpose-built containers. 	Not Compliant 2019 OEIA REC 08 – Ensure waste is adequately segregated. Reiterate to workers in the service compound the requirements for waste segregation. 2019 OEIA OFI 14 – Improve storage of waste batteries by considering storing the waste batteries under cover with adequate spill containment in place.
077	10.4	<u>Waste Measurable Targets</u> No complaints regarding waste from the local community	Complaints Register	A review of the sites complaints register during the audit period identified that no complaints were received during the audit period relating to waste.	Compliant
078	10.4	<u>Waste Measurable Targets</u> No receipt and storage of waste from offsite	Site Inspection Discussion with Pacific Hydro	The auditors were informed that no waste generated offsite of the TWF was brought onto site during the audit period. No waste was identified by the auditors during the audit site inspection which indicated offsite waste had been stored on site.	Compliant
11 ELECTROMAGNETIC INFERENCE PLAN					
079	11.4	<u>Measurable Targets</u> TV re-transmitter annual maintenance performed as per schedule (minimum 1 service inspection per year)	Satellite Television and Radio Australia, Dated 08.11.2018 Invoice Number – INV-516 Satellite Television and Radio Australia, Purchase Order for 2019 Maintenance, dated 03.09.2019	Annual maintenance is conducted by Satellite Television Australia each November. An invoice for the maintenance conducted in 2018 was sighted by the auditors. In addition a Purchase Order for the maintenance due in November 2019 was also sighted.	Compliant
080	<u>11.4</u>	Investigation and resolution of television interference complaints	Complaints register Review of SharePoint during audit site inspection	The auditors conducted a review of complaints received at the TWF during the audit period. A total of 22 complaints were received during the audit period, of which 17 were in relation to a television reception. All complaints relating to television reception were identified as closed in the complaint register. A more detailed review of a number of complaints was conducted. This involved reviewing the detailed correspondence within Pacific Hydro's SharePoint site. This review indicated that for a number of complaints whilst Pacific Hydro considered the complaint to be closed on the basis that the TV reception issues were investigated and deemed to be unrelated to the TWF operations, this was not always accepted by the complainant and from the complainants perspective the complaint could be seen as being unresolved.	Refer to 2019 OEIA OFI 03 (Audit Ref#30)

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
081	11.4	Resolution of television re-transmitter equipment failure or downtime	Lenders Audit. Molino Stewart, August 2019 Complaints Register	<p>The OEMP requires a response to a complainant to occur within 24 hours of receipt of a complaint.</p> <p>The auditors could not verify if complaints had been responded to within 24 hours, based on the information provided. However, the 2019 lenders audit identified that the <i>complaints line goes back to a call back service which creates a voicemail in an inbox which is allocated to the person looking after the asset and is resolved on a case by case basis</i>. A recommendation was made in the 2019 Lenders Audit to review the requirement in the OEMP and for Pacific Hydro to review the procedure around the response.</p> <p>It was reported that there was a long lead time for television re-transmitter spare parts which resulted in some complaints not being resolved for three months whilst waiting for specialist parts to arrive to fix the tv re-transmitter. Pacific Hydro has invested in purchasing specialised spare parts to mitigate this long lead time in the future.</p>	<p>Not Verified</p> <p>2019 OEIA OFI 15 – Address the recommendation made in the 2019 Lenders Audit to review the requirement in the OEMP and for Pacific Hydro to review the procedure around the response.</p>
Appendix H BIRD AND BAT ADAPTIVE MANAGEMENT PLAN					
082	3.3	Should the detected mortality rate of birds and bats significantly exceed two to four bats per turbine per year, or should repeat fatalities of listed threatened bird or bat species occur then measures will be taken to investigate and reduce impacts.	Bird and bat register	<p>Three dead wedge-tailed eagles were identified during the audit period. These occurred on the following dates:</p> <ul style="list-style-type: none"> - 28.11.2017 - 19.12.2017 - 02.12.2018 <p>Mortality rate of birds did not exceed the triggers in the BBAMP which requires further investigation and/or mitigation measures to be implemented.</p>	Not triggered
083	3.4.2	<p><u>Operational Bird and Bat Fatality Monitoring Program</u></p> <p>Further monitoring may be deemed necessary by the (Secretary of the) Department of Planning and Environment however based on the results outlined above this has not been recommended by BLA.</p>	Interviews with Pacific Hydro	The DPIE has not requested any additional monitoring following initial monitoring conducted.	Not Triggered
084	3.4.2	<p><u>Procedures for on-going carcass monitoring (if required)</u></p> <p>Should ongoing carcass monitoring be required, the techniques described in the plan would be applied.</p>	Interviews with Pacific Hydro	Ongoing carcass monitoring had not been triggered during the audit period.	Not Triggered
085	3.4.3	<p><u>Protocol for handling and reporting fatalities and injured wildlife</u></p> <p>All dead birds, feather-spots and/or dead bats found during formal carcass searches or incidentally will be handled in the manner described in Section 3.4.3. The carcass details in the carcass search data sheet (see Appendix 2) will be filled out for each search where a carcass is found, in addition to the search details</p>	<p>Carcass search data sheet</p> <p>Bird and bat register</p>	Pacific Hydro maintains a bird and bat register for the TWF which includes reference to all bird strikes and contributions made for all Pacific Hydro sites.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
086	3.4.3	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.	WIRES contribution following death of wedge-tailed eagles, dated 04/12/2018 and 09/05/2018 Bird and bat register	Three dead wedge-tailed eagles have been identified during the audit period. This occurred on the following dates: <ul style="list-style-type: none">- 28.11.2017- 19.12.2017- 02.12.2018 TWF made contributions to WIRES in accordance with Condition 92 of the sites Project Approval for each death. The auditors sighted evidence of the contributions made to WIRES.	Compliant
087	3.4.4	<u>Annual Report</u> Results from any post-construction monitoring will be presented within an annual report, to be prepared at the end of each year of monitoring. The first-year post construction report focused on presenting the results of the first year of monitoring, and reviewing the monitoring methods and recommending refinements, if necessary for the second year.	BBAMP Report on Year One Implementation, BL&A, September 2016	Condition 93 of the Development Consent requires an annual report to be provided to the Secretary. 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.	Compliant
088	3.4.4	The second-year annual report provided recommendations on whether further monitoring is warranted (or not), based on the results of the post-construction monitoring	Pre-construction bird utilisation and bat survey CBD Energy Group, dated January 2013 Second year annual report email to DPIE and OEH, dated 05.01.2018 Email from OEH dated 06/03/2018	The second-year annual report was submitted to the DPIE and OEH on 05 January 2018. OEH responded on 6 March 2018 with concerns that there was not sufficient data in the report to support the recommendation that further carcass monitoring across the wind farm was not warranted. In particular OEH outlined concerns with the following areas: <ul style="list-style-type: none">- Post-construction bird and bat utilisation surveys- Nest boxes under turbine 15- Habitat description of area adjacent to turbine 16- Hollow-bearing trees and nest boxes near turbines in relation to mortality- Statistical analysis of wedged-tailed eagle mortality; and- Wedged-tailed nest survey methodology. BL&A provided a response to the OEH concerns to Pacific Hydro in its letter dated 28 March 2018. BL&A noted that pre-construction bird and bat utilisation surveys were conducted however the bird and bat adaptive management plan does not require post-construction bird and bat surveys to be undertaken. The adaptive management framework and carcass searches were considered to be sufficient to address impacts to threatened species. B&L did not consider additional surveys to be necessary and instead were reliant on the impact triggers in the BBAMP to be a suitable approach to managing any unforeseeable risks to threatened species in the future. BL&A made the following additional findings in response to OEH's comments: <ul style="list-style-type: none">- Analysis of the location of hollow bearing trees in relation to turbine location and mortality is not considered to be informative.- Nest boxes would not have contributed to elevated mortality of any species other than the Sacred Kingfisher.- One Wedge Tailed Eagle (WTE) was found during formal searches while an additional five carcasses and featherspots were recorded as incidental finds. The incidental finds were	Compliant 2019 OEIA OFI 16 – Seek formal approval or endorsement of the revised BBAMP as evidence that the approach to ceasing formal carcass monitoring is accepted and that concerns of the OEH have been adequately addressed.

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
				<p>recorded at turbines not included in the carcass searches or incidental finds by wind farm staff at locations previously searched during formal searches.</p> <ul style="list-style-type: none"> - The requirement to monitor WTE nests was not part of the approved BBAMP. In addition nest monitoring is not considered to be an informative assessment. <p>Pacific Hydro provided the information supplied by BL&A to OEH on 4 April 2018. The auditors were informed that DPIE had not responded or provided further instructions with regards to OEH's concerns. Pacific Hydro provided the updated OEMP and BBAMP to DPIE and OEH following its update in 2019. Endorsement of the BBAMP had not been received by OEH or DPIE at the time of the audit.</p>	
089	3.4.4	<p>In future, each annual report will contain:</p> <ul style="list-style-type: none"> - A brief description of the management prescriptions implemented and identify modifications made to the original management practices proposed - Results from any bird and bat utilisation surveys and discussion on any observed changes in habitat utilisation or population numbers, and any reasons for the observed changes - Results from any bird and bat collision surveys and an estimate of collisions that takes into consideration the scavenger and searcher efficiency correction factors - Reports on any carcasses recorded outside any formal carcass searches - Results from the comparison of management prescriptions with the performance criteria - Discussion of the analysis of results and the efficacy of the management plan - Details of payments made to WIRES - Mitigation measures implemented - Any significant impact triggers recorded - Analysis of the effectiveness of the Decision-making framework; and - Proposed modifications to the adaptive management program 	Interviews with Pacific Hydro	<p>Annual Reports post the second-year annual report have not been prepared. This was due to a misinterpretation of the requirement for ongoing reporting given the recommendation in the second-year report for not continuing the formal monitoring program.</p> <p>The auditor's interpretation of Development Consent Condition 93 and Section 3.4.4 of the BBAMP is that annual reports are still required unless otherwise agreed with the DPIE.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 09 – Ensure Annual Reports on the BBAMP are prepared and provided to the Secretary of the DPIE in accordance with Condition 93 of the Development Consent</p> <p>2019 OEIA OFI 17 – Consider making it clearer in Section 3.3.4 that future annual reports must also be submitted to the Secretary of the DPIE as per Condition 93.</p>
090	3.5	<p><u>Mitigation measures to reduce risk</u></p> <p>During lambing season (usually late autumn / early winter) working with landholders to minimise lambing within 500 metres of turbines, and during lambing season monitor any instances of lambing in paddocks with 200 metres of turbines</p>	<p>Audit Action Plan, Pacific Hydro, dated 31/08/2017</p> <p>Interviews with Pacific Hydro</p>	<p>It was reported that discussions have been held with landowners however Pacific Hydro is restricted with how much it can influence farmers actions / enforce lambing >500m of turbines. It is also noted that for some landowners their boundaries are within 500m of a turbine and therefore they are unable to conduct lambing in excess of 500m from a turbine.</p> <p>The site reports that this has not generally been an issue in the past.</p> <p>The 2016 OEIA report provided an OFI to discuss amendment of the BBAMP with BL&A to determine the best course of action and to discuss and agree with OEH a course of action. Pacific Hydro committed to amending this commitment in the BBAMP, in its Action Plan dated 31 August 2017. At the time of the audit this condition remained in the BBAMP and could not be adequately complied with or enforced due to practicalities and landholders lease requirements.</p>	<p>Not Compliant</p> <p>2019 OEIA REC 10 – Update the OEMP to reflect the limitations that some landholders have regarding lambing in excess of 500m from a turbine.</p>
091	3.5	In order to reduce collision risks to birds, working with landholders to ensure that stock will not be fed grain underneath turbines as this may also attract parrots and cockatoos, and raptors which prey on these species	Interviews with Pacific Hydro	Grain feeding is not conducted within close proximity of the turbines. Pacific Hydro was not required to intervene with landowners as this was not an issue.	Not triggered

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
092	3.5	Support landholder's rabbit control programs across the wind farm by monitoring hardstands and access tracks for rabbit harbour locations. Further, Pacific Hydro will ensure that wind farm activities do not prevent any landholder rabbit control activities.	Lenders Audit, 2019 Interviews with Pacific Hydro	The site reported that rabbits have not been identified as an issue at TWF. This is further validated in the ER's Lenders audit 2019 which states that during the site inspection conducted on dusk only one rabbit was observed onsite with its burrow being identified offsite on Crown Land.	Compliant
093	3.5	An active carrion removal program implemented with land holders to include the elements as outlined below: <ul style="list-style-type: none"> Inspections during routine maintenance of the wind farm site by service technicians) will record any stock, introduced or native mammal and bird carcasses that may attract raptors (e.g. kangaroos, foxes, rabbits, dead stock). Regular routine maintenance includes driving around all access tracks and visually scanning from the hard stand all visible surrounding areas around the turbines; Any observations of carcasses made by any on-site staff in the vicinity of turbines will be reported to the Site Manager who will request that the landholder removes the carcass as soon as possible in line with recommended best practice Consult with landowner or manager in relation to the appropriate disposal of collected carrion 	TWF quarterly inspections, 2018-2019 Interviews with Pacific Hydro Site Inspection	Quarterly inspections of the site are conducted which include identification of any identified carcasses. Identified carcasses are notified to the landowner however the auditors were informed that this does not happen often. In 2018 several dead stock i.e. sheep were identified and reported to landowners. This was due to the dry conditions and lack of food supply.	Compliant
094	3.5	<u>Lighting on turbines and buildings</u> building lighting should be baffled and directed to avoid excessive light spillage and security lighting should be baffled to direct it towards the area requiring lighting and not skyward. Should aviation safety lighting be required on turbine nacelles then this should take the form of low intensity, LED red flashing lights with a narrow vertical cross-section directed at aircraft	Site Inspection Interviews with Pacific Hydro	Pacific Hydro stated that there are no requirements for aviation safety lighting to be installed at TWF. Lighting onsite includes: <ul style="list-style-type: none"> Emergency lighting at the substation which is used as required Low intensity security lighting at the substation which is used as required Lighting on the O&M building located in the service compound which operates on a timer during worker shift times.	Compliant
095	3.5	<u>Marking of power lines</u> If required, powerlines within the wind farm boundary may be fitted with deterrents including marker balls and/or flags that will reduce bird collision risk.	Interviews with Pacific Hydro	The site does not deem this to be a requirement at TWF	Not Triggered
096	3.6	<u>Significant impact triggers and mitigation measures</u> The decision-making framework to be followed should a significant impact trigger be identified is detailed in section 3.6.2 A significant impact trigger is defined as: <ul style="list-style-type: none"> In any two successive mortality searches, two or more carcasses (of any species) are found at an impact point in each search (i.e. a total of four carcasses in two successive searches at the one turbine); and / or A threatened or listed migratory species is found dead under a wind turbine during any mortality search	Interviews with Pacific Hydro	There has not been any significant impact triggers during the audit period. It is noted that on the basis of the recommendations of the second annual report, routine carcass monitoring is no longer undertaken. Instead incidental bird and bat carcass finds are reported by wind farm personnel. This introduces a risk that however the recommendations were made by experts	Not triggered
097	3.6	Should species specific monitoring suggest that one particular turbine is regularly in the flight path of a species of concern and is therefore presenting a higher risk of collision, shut down of the high-risk turbine may be deemed necessary. Any decision to shut down a turbine will be based on rigorous field surveys and a shutdown protocol will be prepared that is relevant to the behaviour and activity of the species of concern	Interviews with Pacific Hydro	The auditors were informed that species specific monitoring had not been conducted during the audit period. No instances of turbines being shut down due to a higher risk of collision by a species of concern occurred during the audit period.	Not triggered

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
098	3.6.2	Responsive mitigation measures will be developed and implemented as needed and in a timely manner. Supplementary mitigation measures specific to possible causes of the fatality are outlined in Table 5 and section 3.5.3	Interviews with Pacific Hydro	The site has not identified a trigger for responsive mitigation measures to be implemented.	Not Triggered
099	3.6.2	Any required investigation, and recommended management and supplementary mitigation measures, will be documented in the site management log and detailed in annual reports. This log will be available for inspection by the Environmental Representative or on the request of the Secretary.	Interviews with Pacific Hydro	Annual reports have not been prepared and provided to the DPIE since the completion of the first two years of monitoring. The site informed the auditors that no investigations were required to be documented in the site management log.	Not Triggered Refer 2019 OEIA REC 09 and OFI 17
100	3.7	<u>Management Activities, timing and performance criteria</u> Implement an integrated rabbit control program if the carrion removal program suggests rabbit carcasses are an issue	Lenders Audit, 2019 Discussion with Pacific Hydro	The site reported that rabbits have not been identified as an issue at TWF. This is further validated in the ER's Lenders audit 2019 which states that during the site inspection conducted on dusk only one rabbit was observed onsite with its burrow being identified offsite on Crown Land. As such, this has not been triggered.	Not Triggered
APPENDIX D NOISE MANAGEMENT PLAN					
101	Table 3	<u>Noise Compliance Testing</u> 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 Report (Sonus, November 2015, Ref: S2570C61) Addendum Environmental Noise Compliance Report (Sonus, January 2016, Ref: S2570C67)	Initial noise compliance testing was undertaken within six months of the commencement of operations by Sonus Pty Ltd (Sonus) in 2015 and 2016.	Complete
102	4.0 & Procedure 8	<u>Non-compliance Procedure</u> 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:	Noise Compliance Report (Sonus, November 2015, Ref: S2570C61) Addendum Environmental Noise Compliance Report (Sonus, January 2016, Ref: S2570C67)	The results of the noise compliance testing (Sonus, 2015 and 2016) did not indicate any exceedances of the operational noise criteria. No additional noise testing was conducted during the audit period.	Not Triggered
103	Table 3	<u>Noise Complaint Procedure</u> Noise complaints will be managed as outlined in Section 8 of the NMP.	Complaints Register	No noise complaints were received during the audit period.	Not Triggered
104	Table 3	<u>WTG Maintenance</u> WTGs are inspected and maintained regularly (six monthly) to ensure they are operating as intended.	Vestas system - SAP	The auditors sighted the Service Schedule which shows the dates when scheduled maintenance is due for each WTG as per manufacturer's recommendation. Vestas utilise SAP to track and generate work orders for routine maintenance of the WTG's.	Compliant

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
105	Table 3	Guaranteed maximum Sound power Levels and Tonality Performance The wind farms contract with the WTG supplier includes guaranteed maximum sound power levels and tonality performance for each WTG type.	Environmental Noise Compliance Report, Sonas Pty Ltd, 2015 & 2016	The auditors were informed that TWFs contract with the WTG supplier includes guaranteed maximum sound power levels and tonality performance for all WTG. External contractor Sonas Pty Ltd conducted noise compliance testing in 2015 and 2016. This assessment included an assessment against the EPC Contract, Schedule 17 and verified compliance. The noise assessment did not detect the presence of excessive tonality.	Compliant
106	Table 3	<u>Noise Ameliorative Measures</u> Ameliorative measures may be provided to the receivers H1, H3, H5 or 'the Farm' if requested within first two years of operations.	Interviews with site personnel	Site management reported that there had been no requests received from receivers H1, H3, H5 or 'the Farm' during the audit period.	Not Triggered
107	4.0	<u>Substation Maintenance</u> The Substation is inspected (monthly) and maintained regularly (six monthly) to ensure it is operating as intended.	Interviews with site personnel	Access to the substation is controlled by a permit to work system. Substation equipment is inspected monthly by Pacific Hydro. Inspection records are recorded in Pacific Hydro's system 'FIXD'. A three monthly, six monthly and annual inspection is undertaken by external contractor Downer.	Compliant
108	4.0	<u>Standard Working Hours</u> 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.	Site Induction Interviews with site personnel	Interviews conducted with Pacific Hydro staff indicated that work is generally conducted within the hours specific in Section 1.3 of the sites OEMP. On occasion however work is conducted on site post 1pm on Saturday and Sundays. The type of work conducted outside of the prescribed hours is generally turbine breakdown maintenance and service work. No noise creating work, i.e. use of hydraulic pumps, is reportedly conducted during these hours of work.	Compliant
109	4.0	<u>Speed Restrictions</u> All site traffic will be restricted to the maximum speed shown on signs at all site entries.	Site Induction Site Inspection	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 J POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN					
110	3	Chemicals and materials that are either being used or are stored within the TWF activity area are listed in Table 3-1.	Site Inspection	The chemicals listed in Table 3-1 of the PIRMP were reflective of the chemicals sighted during the audit site inspection.	Compliant
111	4.3	Pacific Hydro is the proponent for TWF. All contractors engaged to undertake work at the wind farm are required to undertake a project induction in accordance with the OEMP and provisions of the Project Approval and EPL 20429.	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
112	6.0	A list of the emergency contacts is displayed in the Site Office.	Site Inspection	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	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
113	6.2	The following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment: <ul style="list-style-type: none"> - An employee or agent carrying on the activity - An employer carrying on the activity The occupier of the premises where the incident occurs	Interviews with site personnel Incident Register	Site management reported that there no pollution incidents that caused or threatened material harm occurred during the audit period and therefore the notification requirements of the PIRMP had not been triggered. The Incident Register was reviewed during the Site inspection and did not include reference to a pollution incident which could have caused or threatened material harm.	Not Triggered
114	6.3	Should a pollution incident occur, the person discovering the pollution incident is to notify the site supervisor who will then immediately notify the regional services manager. The regional services manager will then request the Pacific Hydro Engagement and External Affairs Team to contact the relevant landholders.	Interviews with site personnel Incident Register	Site management reported that there were no pollution incidents recorded during the audit period.	Not Triggered
115	6.4	Section 148 of the POEO Act sets out requirements for notifications where a pollution incident causes or threatens material harm to the environment. EPA NSW, including other relevant authority listed and owners or occupiers of premises in the vicinity or likely to be impacted by a pollution incident as listed in Section 6.1, must be notified immediately about pollution incidents causing or threatening material harm to the environment. If a pollution incident has the potential to affect external parties Figure 2-3 above can be used to establish which landholder/s will be affected.	Interviews with site personnel Incident Register	Site management reported that there no pollution incidents that caused or threatened material harm occurred during the audit period and therefore the notification requirements of the PIRMP had not been triggered.	Not Triggered
116	6.4.1	As soon as practicable after becoming aware of the incident or contamination the key actions are provided in Table 6-3.	Interviews with site personnel Incident Register	Site management reported that there were no pollution incidents or contamination recorded during the audit period.	Not Triggered
117	6.4.2	<u>Bushfire Pollution Incident Response</u> In the event that a bushfire or grass fire does occur on the site or in neighbouring properties the following steps in Table 6-4 below should be followed.	Bushfire Management Plan	RFS previously 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. In addition Vestas and local RFS conducted a small drill on-site with RFS during the previous audit period. A bushfire management plan has been developed in consultation with the local RFS. In January 2018 a bushfire occurred on the land to the east of the TWF. It is noted that the PIRMP was updated in June 2019 and the bushfire incident response protocol was not in place in January 2018.	Not Triggered
118	6.4.3	Key Actions for Pollution Incident Response – Spills are detailed in Table 6-5.	Interviews with site personnel Incident Register	Site management reported that there had been no pollution incidents that triggered the incident response procedures of the PIRMP recorded during the audit period.	Not Triggered
119	6.5	<u>Training and Education</u> All site staff, subcontractors and consultants will be required to undergo a site induction which will include information on standard environmental practices on-site.	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

Audit Ref #	OEMP Reference	Requirement	Evidence Sighted	Comments / Key Findings	Compliance Status and Recommendations
120	6.6	<u>Audit and Review of the PIRMP</u> EPA guidelines state that it is a legislative requirement that PIRMPs must be tested as follows: <ul style="list-style-type: none"> - Routinely tested at least once every 12 months - Within one month of any pollution incident occurring in the course of any activity to which the licence relates. Details of the test of the PIRMP need to be recorded and where the PIRMP is updated it should be uploaded to the TWF website.	EPA Website PIRMP Testing Record, 13 Dec 2019	The EPA website reports that the PIRMP was last tested on 17 July 2018. Details of the tests of the PIRMP were not identified on the TWF website as stated in the PIRMP. Following the audit site inspection the auditors were provided with a record of the PIRMP being testing on 13 December 2019. The PIRMP was not tested at least every 12 months as committed to in the OEMP and EPA guidelines.	Not Compliant 2019 OEIA RFI 11 – Testing of the PIRMP must be conducted at least every 12 months. Ensure records of testing are maintained and readily available. 2019 OEIA OFI 18 – Ensure details of the tests of the PIRMP are available on the TWF website.