

# INDEPENDENT ENVIRONMENTAL AUDIT

SILVERTON WIND FARM  
Project Approval 08\_0022

18 June 2021

Prepared for:  
AGL Hydro Partnership as agent for PARF  
Company 8 Pty Ltd as trustee of the Silverton  
Project Trust

J0078/210718 (Rev 1)



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18 July 2021

## INDEPENDENT ENVIRONMENTAL AUDIT

### SILVERTON WIND FARM

J0078/210718 (Rev 1)

Project Director



.....  
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Director

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# Abbreviations

Term	Definition
AGL	AGL Hydro Partnership
BCD	Biodiversity Conservation Division of the Department of Industry, Planning and Environment
BCA	Building Code of Australia
BAMP	Operational Biodiversity Adaptive Management Plan
BHCC	Broken Hill City Council
CCC	Community Consultative Committee
CoA	Condition of Approval
Condition 0Y.0X	Refers to condition X in schedule Y of the Project Approval
CEEC	Critically Endangered Ecological Community
DPIE	NSW Department of Planning, Industry and Environment
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
GE	General Electric International Inc
IEA	Independent Environmental Audit
PARF	Powering Australian Renewables: PARF Company 8 Pty Ltd as trustee of the Silverton Project Trust
PIRMP	Pollution Incident Response Management Plan
Project	The Silverton Wind Farm as described in the Environmental Assessment and approved under Project Approval 08_0022
Proponent	Silverton Wind Farm Developments Pty Ltd
Secretary	Secretary of the NSW Department of Planning, Industry and Environment
TfNSW	Transport for New South Wales

# 1. Executive Summary

The Silverton Wind Farm is located in the Barrier Ranges of western New South Wales (NSW), approximately 5km north of the Silverton township and 25km north-west of Broken Hill. The 200 MW Silverton Wind Farm (**the Project**) consists of 58 x 3.43-130 wind turbines, an electrical substation and an Operations and Maintenance Facility.

The Project was subject to an environmental impact assessment under the *Environmental Planning and Assessment Act 1979* (EP&A Act). It is classified as a critical infrastructure project and received Project Approval on 24 May 2009, subject to the conditions provided in the Instrument of Approval (08\_0022).

Construction of the Project commenced on 11 May 2017 with TransGrid responsible for the delivery of the connection works and GE-CATCON for the wind farm works. TransGrid completed the connection works in February 2018 and energised on 20 February 2018 to enable GE-CATCON to progressively commission the 58 wind turbines. The final wind turbine was erected in early 2019, however, commissioning of the wind farm was significantly impacted by the West Murray Constraint which led to a protracted commissioning process during 2019 and 2020. Maximum generation was achieved in May 2020 and practical completion was recently awarded on 31 May 2021.

The Project is currently operational with General Electric International Inc (**GE**) engaged as the operations and maintenance service provider.

The requirement to conduct an Independent Environmental Audit (**IEA**) is captured within the Project Approval (condition 04.07). The specific requirements of condition 04.07 are detailed below (bold italics) together with a summary of the audit findings.

***Within one year of commencement of construction, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project.***

The 2021 IEA was commissioned within three years of commencement of the previous audit and captures construction and operational activities during the period 10 May 2018 to 11 May 2021.

***This audit must:***

***a. be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary;***

The 2021 IEA was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with Exemplar Global. Ms Corish was approved to conduct the audit by the Secretary on 31 March 2021 (**Appendix F**).

In carrying out the duties of an environmental auditor, the judgement of Ms. Corish was not impaired by reason of any relationship with or interest in AGL or any of its subsidiaries. Ms Corish is independent of AGL with respect to employment relationships, financial relationships and the provision of non-audit services. Refer to the Independent Audit Report Declaration Form in **Appendix G** for further details.

***b. include consultation with the relevant agencies;***

In accordance with the Independent Audit Post Approval Requirements (DPIE, May 2020), consultation was undertaken with the Department of Planning, Industry and Environment (**DPIE**) on the scope of the audit. DPIE advised AGL on 24 April 2021 to also consult with the NSW Environment Protection Authority (**EPA**), Transport for NSW (**TfNSW**), Biodiversity Conservation Division (**BCD**) of

DPIE, Broken Hill City Council (BHCC) and the Community Consultative Committee (CCC). Feedback received was captured within the scope of the audit.

***c. assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL/s;***

Within the defined scope, AGL and GE demonstrated substantial compliance against the conditions of the Project Approval and the Environment Protection Licence (EPL). Of the 123 conditions assessed, three non-compliances were identified, resulting in 98% compliance.

***d. review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and;***

The auditor sighted sufficient evidence to demonstrate that the approved strategies, plans and programs required under the Project Approval are appropriate for the nature and scale of the development and adequately implemented. Matters of non-compliance relating to the strategies, plans and programs were administrative in nature.

***e. recommend measures or actions to improve the environmental performance of the project and/or any strategy, plan or program required under these approvals.***

A limited number of recommendations were identified to strengthen controls, enhance performance and achieve ongoing compliance against the conditions of the Project Approval and the EPL. The recommendations are found in **Table 5.3** (Project Approval Opportunities for Improvement).

## 2. Introduction

### 2.1 Silvertown Wind Farm

The Silvertown Wind Farm is located in the Barrier Ranges of western New South Wales (NSW), approximately 5km north of the Silvertown township and 25km north-west of Broken Hill. The 200 MW Silvertown Wind Farm (**the Project**) consists of 58 x 3.43-130 wind turbines, an electrical substation and an Operations and Maintenance Facility.

The Project is subject to an environmental impact assessment under the *Environmental Planning and Assessment Act 1979* (EP&A Act). It is classified as a critical infrastructure project and received Project Approval on 24 May 2009, subject to the conditions provided in the Instrument of Approval (08\_0022).

The Project was modified on three occasions, the most recent being Modification 3 on 22 December 2016. Modification 3 resulted in a decrease in the number of turbines from 282 to 172, while increasing the dimensions and capacity of each turbine.

The Proponent as named on the Project Approval is Silvertown Wind Farm Developments Pty Ltd, however the associated lease was assigned to PARF Company 8 Pty Ltd as trustee for the Silvertown Project Trust on 18 January 2017. PARF – a partnership between AGL, QIC and the Future Fund – is the asset owner, and AGL is the sole asset manager.

Construction of the Project commenced on 11 May 2017 with TransGrid responsible for the delivery of the connection works and GE-CATCON for the wind farm works. TransGrid completed the connection works in February 2018 and energised on 20 February 2018 to enable GE-CATCON to progressively commission the 58 wind turbines. The final wind turbine was erected in early 2019, however, commissioning of the wind farm was significantly impacted by the West Murray Constraint which led to a protracted commissioning process during 2019 and 2020. Maximum generation was achieved in May 2020 and practical completion was recently awarded on 31 May 2021.

The Project is currently operational with General Electric International Inc (**GE**) engaged as the operations and maintenance service provider.

### 2.2 Independent Environmental Audit Requirement

The requirement to conduct an Independent Environmental Audit (**IEA**) is reflected in the Project Approval (condition 04.07). The requirements of condition 04.07 are detailed in **Table 2.1** together with a cross reference to the relevant section of this report.

**Table 2.1 Condition of Approval 04.07 and How Addressed**

Reference	Requirement	Where Addressed
04.07	Within one year of commencement of construction, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:	Appendix B, Table B1
04.07(a)	be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Secretary	Section 2.4.1
04.07(b)	include consultation with the relevant agencies	Section 2.3.1
04.07(c)	assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL/s	Section 3 and Appendix B, Table B1

Reference	Requirement	Where Addressed
04.07(d)	review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and	Section 3.2 and Appendix B, Table B1
04.07(e)	recommend measures or actions to improve the environmental performance of the project and/or any strategy, plan or program required under these approvals.	Section 5

## 2.3 Audit Scope

The scope of the 2021 Independent Environmental Audit (**2021 IEA**) was limited to an assessment of activities of the Project during the period 10 May 2018 to 11 May 2021. This included activities associated with the final stages of construction (performed by GE-CATCON) and the early operational phase of the Silverton Wind Farm (performed by GE).

Specific elements of the scope included:

- An assessment of compliance against the audit criteria:
  - Relevant conditions of Project Approval 08\_0022
  - Environmental Management Plans and Sub-plans and other relevant post approval documents
  - Environment Protection Licence 20882
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance
- An assessment of the implementation of the previous 2018 IEA findings, recommendations and actions
- An evaluation of the adequacy of the Environmental Management Plans to achieve legislative requirements and drive performance improvements.

### 2.3.1 Consultation

In accordance with the requirements of the Independent Audit Post Approval Requirements (DPIE, May 2020), consultation was undertaken with the Department of Planning, Industry and Environment (**DPIE**) on the scope of the audit. DPIE advised AGL on 24 April 2021 to also consult with the following stakeholders:

- NSW Environment Protection Authority (**EPA**)
- Transport for NSW (**TfNSW**)
- Biodiversity Conservation Division (**BCD**) of DPIE (previously the Office of Environment and Heritage)
- Broken Hill City Council (**BHCC**)
- Community Consultative Committee (**CCC**).

Transport for NSW, the EPA, Broken Hill City Council and the Community Consultative Committee confirmed that there were no additional matters to be included in the scope of the audit. Feedback provided by the remaining stakeholders is detailed in **Table 2.2** and consultation records are provided in **Appendix D**.

**Table 2.2 Stakeholder Consultation – Outcomes**

Agency	Matters Raised	Response
DPIE	Noise management and monitoring	Refer to <b>Appendix B, Table B1</b> (Condition 03.06 to 03.10).
	Rehabilitation of the site	Refer to <b>Appendix B, Table B1</b> (Condition 03.36).
	Erosion and sediment controls	Refer to <b>Appendix B, Table B1</b> (Condition 03.16).
	Vegetation and fauna management and monitoring including threatened species	Refer to <b>Appendix B, Table B1</b> (Condition 03.17 to 03.19).
	Bird and bat management and monitoring	Refer to <b>Appendix B, Table B1</b> (Condition 03.19).
	Adaptive management	Refer to <b>Appendix B, Table B1</b> (Condition 03.19, 03.18 and 04.02).
	Traffic movements/management	Refer to <b>Appendix B, Table B1</b> (Condition 03.22 to 03.27).
	Community engagement	Refer to <b>Appendix B, Table B1</b> (Condition 04.04).
	Complaint register and management of complaints	Refer to Section 3.4.3.
BCD	We [BCD] are currently reviewing a revised version of the Bird and Bat Adaptive Management Plan (BBAMP), which requires consultation with other parts of the Department. We are not able to give feedback about the BBAMP until that review is finalised, which is unlikely within the Audit timeframe.	Noted.
	Note that a complete finalised version of the approved BBAMP was not uploaded to the AGL website. We were notified by Biosis in November 2020 that the publicly available version did not effectively include our final comments, including the requirement for baseline bat survey in March/April. This also impacted the carcass monitoring program however we understand that Skylos Ecology did additional work to complete the dataset. We have been supplied with the first Annual Bird and Bat Monitoring Report but are yet to receive the Year 1 Collision Monitoring Report.	<p>The Project Ecologist (Biosis) advised that due to an oversight, the specific request to conduct the survey in March was not reflected in the final Bird and Bat Adaptive Management Plan (5 May 2018). Rather, the Bird and Bat Adaptive Management Plan notes that the annual bat utilisation survey is to be undertaken in autumn (March to May). The autumn bat utilisation surveys were subsequently conducted by Biosis in May 2019 and April/May 2020. Biosis confirmed that the 2021 bat utilisation survey was completed in March as per the BCD request.</p> <p>It was advised by Biosis that the collision reporting for year 1 is included in the YEAR 1 Bird and Bat Mortality Monitoring Survey Silverton Wind Farm NSW (Elmoby Ecology) which was submitted to BCD for review on 3 May 2021.</p> <p>Refer to <b>Appendix B, Table B1</b> (Condition 03.19) for additional details.</p>

Agency	Matters Raised	Response
	The 2018 Independent Environmental Audit prepared by MCW Environmental reported that permanent drainage controls to manage long-term erosion and sedimentation risks associated with access roads had not been installed. BCD are particularly concerned about unmitigated impacts to the critically endangered Porcupine Grass Sparse Woodland where it occurs downhill and adjacent to construction disturbance.	During the site inspection, it was noted that construction activities were complete and permanent drainage structures were largely established. Within Area 7, which includes the Porcupine Grass Sparse Woodland community, soil erosion was effectively managed and there was no evidence of sediment within the Critically Endangered Ecological Community. Refer to <b>Appendix B, Table B1</b> (Condition 03.16) for additional details.
	Weed introduction and spread due to development of the wind farm may not have been evident during drought conditions but are likely to proliferate after rainfall events.	It was advised by Biosis that three inspections were undertaken in 2020, including two post-rainfall event inspections. The post-rainfall event inspections identified additional weed species which are to be reflected in the revised Vegetation Management Plan (2021). Refer to <b>Appendix B, Table B1</b> (Condition 03.17 (f)) for additional details.
	Management of goats according to the approved plan is critical to allow vegetation to recover following higher rainfall periods.	An opportunity for improvement was identified to ensure goats are actively managed within Area 7. Refer to <b>Table 5.3</b> and <b>Appendix B, Table B1</b> (Condition 03.18) for additional details.
	BCD understands that there will be a full review of management plans during 2021, three years after the start of construction. We are expecting BCD to be consulted during the review of biodiversity-related management plans, particularly whether survey results indicate a need for altering survey and monitoring program design. For example, review of the Barrier Range Dragon 2019 and 2020 monitoring reports indicates that more statistical rigour is needed for meaningful results. Confirmation of the need for such a review and anticipated timing would be appreciated.	An opportunity for improvement has been identified to ensure that the 2021 revision of the Operational Biodiversity and Adaptive Management Plan is undertaken in consultation with nominated agencies and stakeholders, including BCD. Refer to <b>Appendix B, Table B1</b> (Condition 03.18 and 03.19) for additional details.

Agency	Matters Raised	Response
	<p>Further to our [BCD] letter, one of our key issues throughout construction and commencement of operation at Silverton has been the timing of bat survey.</p> <p>We [BCD] recommend that all survey and monitoring related to bat use of the site and bat mortality is reviewed to ensure that there is at least one dataset from March. An absence of this survey period potentially affects any predictions about bat utilisation or mortality.</p>	<p>Biosis has confirmed that the bat utilisation survey was completed in March 2021 as per the BCD request.</p> <p>Refer to <b>Appendix B, Table B1</b> (Condition 03.19) for additional details.</p>



### 2.3.2 Audit Period

Reflecting the requirements of the Project Approval, the audit period is three years. The 2018 Independent Environmental Audit, prepared by MCW Environmental (January 2019) (**2018 IEA**) was commissioned on 11 May 2018. This audit (**2021 IEA**) was commissioned on 10 May 2021 and the audit period is defined as May 2018 to May 2021.

The findings of the 2021 IEA reflect conditions and documentation presented during the period 10 May 2021 to 1 July 2021, including a site inspection on 10 June 2021.

## 2.4 Methodology

The 2021 IEA was conducted in accordance with the Independent Audit Post Approval Requirements (DPIE, May 2020) and ISO 19011:2018 – Guidelines for Auditing Management Systems. Specific tasks included:

1. **Opening meeting** – An opening meeting was held at the commencement of the audit to:
  - a. Confirm the audit objectives, scope, and criteria
  - b. Discuss resources requirements
  - c. Confirm the audit schedule
  - d. Establish methods and procedures for conducting the audit, including testing methods.The meeting minutes are provided in **Appendix E**.
2. **Agency and community consultation** – Consultation was undertaken with agencies and parties as nominated by DPIE to obtain feedback and identify issues within the audit scope (refer to Section 2.3.1).
3. **Site Inspection** – A site inspection was conducted on 10 June 2021, inclusive of all development areas and environmental aspects within the audit scope. The purpose of the site inspection was to assess implementation of environmental controls, determine the status of the operations and evaluate overall environmental performance.
4. **Interviews** – Full and complete access was provided by AGL and GE to the required personnel. The following employees with responsibility for environmental management and site operations were interviewed:
  - a. Adam Mackett (Project Director – Silverton Wind Farm, Major Projects, AGL)
  - b. Richard Armstrong (Asset Leader Wind and Solar NSW/QLD, AGL)
  - c. Sara Regio Candeias (Environment Business Partner, AGL)
  - d. Simon Philippides (Environment Advisor, Renewables VIC/NSW, AGL)
  - e. Michael Brownlie (Site Services Manager, GE)
  - f. Alana Philp (Wind Site Administrative Assistant, GE).
5. **Document review** – Relevant documents, records and systems were reviewed for accuracy and completeness.
6. **Compliance assessment** – The compliance status was determined for all relevant conditions in accordance with the Independent Audit Post Approval Requirements definitions (**Table 2.3**).
7. **Reporting** – Draft and final reports were prepared detailing the outcomes of the audit and compliance assessment. Revisions to the draft report were undertaken to reflect additional information or correct errors in fact.

8. **Closing meeting** – A closing meeting was held on completion of the audit to present preliminary audit findings, recommendations and any post-audit actions. The meeting minutes are provided in **Appendix E**.

**Table 2.3 Compliance Status Definitions**

Compliance Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that had not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

### 2.4.1 Audit Team

The audit was conducted by Denise Corish, a Director of Treo Environment and a registered Environmental Lead Auditor with Exemplar Global. With over 20 years' experience in environmental management, Denise has held senior positions in consulting firms and corporations in Australia, Singapore and the UK.

In carrying out the duties of an environmental auditor, the judgement of Ms. Corish was not impaired by reason of any relationship with or interest in AGL or any of its subsidiaries. Ms. Corish is independent of AGL with respect to employment relationships, financial relationships and the provision of non-audit services.

Ms Corish was approved to conduct the independent audit by the Secretary on 31 March 2021 (refer to **Appendix F**).

## 3. Environmental Performance

### 3.1 Introduction

Reflecting the scope of the audit, this section presents an assessment of the environmental management framework and a review of environmental performance.

### 3.2 Environmental Management Framework

Guided by the Overarching Environmental Management Strategy and the Operational Environmental Management Strategy, the environmental management framework includes the following aspect-specific plans:

- Operational Biodiversity Adaptive Management Plan
- Porcupine Grass Sparse Woodland Recovery Plan
- Barrier Range Dragon Management Plan
- Goat Management Plan
- Vegetation Management Plan
- Bird and Bat Adaptive Management Plan
- Operational Heritage Management Plan
- Fire Management Plan
- Feral Pest Management Plan.

The auditor sighted sufficient evidence to demonstrate that the environmental management framework is appropriate for the nature and scale of the development and adequately implemented. Matters of non-compliance, summarised below and detailed in **Section 5**, were administrative in nature:

- Revision of Strategies, Plans and Programs (2021-NC-01): Insufficient evidence was provided to demonstrate that all strategies, plans and programs were reviewed within three months of submission of the 2018 IEA (**Table 5.1**).
- Regular Reporting (2021-NC-02) – Environmental performance reporting is not consistently undertaken in accordance with relevant plans (**Table 5.1**).

### 3.3 Environmental Performance Assessment

#### 3.3.1 Site Inspection

At the time of the site inspection (10 June 2021), construction of the civil, structural and electrical works was complete, and the wind farm was operational. Activities undertaken on site were limited to operations and maintenance.

As detailed in the site photos (**Appendix C**), rehabilitation was significantly progressed and permanent drainage structures were largely established. While isolated opportunities for improvement were identified (**Section 5**), significant environmental risks were adequately controlled.

#### 3.3.2 Actual versus Predicted Impacts

The Project Environmental Assessment proposed the construction and operations of 172 wind turbines. In accordance with the Final Layout Plan submitted to DPIE, 58 turbines were constructed within approved locations. The Statement of Commitments detailed in the Project Environmental

Assessment were largely captured or superseded by the Project Approval and substantial compliance was demonstrated.

During the audit period, there were no new areas of construction as compared to that which was assessed within the 2018 IEA and no new off-site impacts.

### 3.3.3 Key Strengths

The following strengths were identified during the audit:

- **Area 7 Erosion and Sediment Control** – Area 7 of the Project includes the Porcupine Grass Sparse Woodland community and the Barrier Range Dragon habitat. Erosion and sediment controls were commensurate with the ecological risks of this area; access tracks were constructed with regularly spaced cross-banks including outlet protection (coir logs) and table drains/banks were installed on steep inclines to divert rainwater and prevent scour. There was no evidence of run-off or sediment within off-road areas.
- **Road Condition** – Roads and access tracks, including creek crossings, were generally well maintained.
- **Compliance Management** – Management of compliance obligations, including inspections and audit findings is achieved through the GenSuite system (GE) and SAP Compliance (AGL). These compliance systems incorporate a scheduling function and provide automatic alerts and escalation of overdue actions.

## 3.4 Environmental Compliance

### 3.4.1 Notices, Orders, Penalty Notices and Prosecutions

There were no prosecutions during the audit period and no notices, orders or penalty notices issued to GE or AGL.

### 3.4.2 Environmental Incidents

During the audit period, there were three environmental incidents reported internally by GE. The incidents were minor in nature and associated with hydraulic oil leaks. There were no impacts to water sources, the spill response was adequate and appropriate, and the incidents were closed in a timely manner.

### 3.4.3 Environmental Complaints

During the audit period, AGL continued to operate a telephone line to receive complaints and the AGL Silverton Wind Farm website provides details of email and postal communication channels.

As required by the Project Approval, the Complaints Register is publicly available on the AGL Silverton Wind Farm website. AGL reported two complaints during the audit period relating to road restoration, visual amenity and heavy vehicles. An adequate response was provided to address the concerns of the respective stakeholders and there were no repeat complaints.

## 4. Previous Audit Findings and Recommendations

The 2018 IEA identified 11 recommendations and 21 opportunities for improvement. **Appendix A** (Table A1) details the status of actions arising from the 2018 IEA, including the proposed and actual completion date (where relevant) and the verified outcomes. Adequate evidence was sighted to demonstrate closure of all recommendations and opportunities for improvement (**Appendix A**).

## 5. Current Audit Findings and Recommendations

Within the defined scope of the 2021 IEA, the Project demonstrated substantial compliance against the conditions of the Project Approval and EPL (**Appendix B**).

A total of three non-compliances were identified, resulting in 98% compliance (**Table 5.1** for the Project Approval and **Table 5.2** for the EPL). The non-compliances were administrative in nature and of low environmental consequence. In addition, six opportunities for improvement were identified (**Table 5.3**).

**Table 5.1 Project Approval Non-Compliances**

ID	Reference	Condition	Non-Compliance	Recommended Action
2021-NC-01	04.03	<p><b>Revision of Strategies, Plans and Programs</b></p> <p>Within 3 months of the submission of:</p> <ul style="list-style-type: none"> <li>a) an incident report under condition 5 below;</li> <li>b) an audit report under condition 7 below; or</li> <li>c) any modification to the conditions of this approval (unless the conditions require otherwise),</li> </ul> <p>the Proponent must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	<p><b>2021-NC-01:</b> Insufficient evidence was provided to demonstrate that all strategies, plans and programs were reviewed within three months of submission of the 2018 IEA. Specifically, there was no evidence that the Operations Environmental Management Strategy and the construction Traffic Management Plan were reviewed between 28 August 2018 and 28 November 2018.</p>	<p>It is recommended that strategies, plans and programs required under this approval be reviewed within three months of the submission of the 2021 IEA. Where one or more documents require revision, the approval process detailed in this condition must be implemented.</p>

ID	Reference	Condition	Non-Compliance	Recommended Action
2021-NC-02	04.06	<p><b>Regular Reporting</b></p> <p>The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.</p>	<p><b>2021-NC-02:</b> Environmental performance reporting is not consistently undertaken in accordance with relevant plans. Specific findings are summarised as follows:</p> <ul style="list-style-type: none"> <li>• The Biodiversity and Adaptive Management Plan includes commitments to prepare and submit an annual report. An annual report has not been prepared to date. Biosis advised that the first report would be prepared in October 2021 which will capture the extended commissioning phase.</li> <li>• The Vegetation Monitoring Plan includes commitments to prepare and submit an annual report. Vegetation monitoring was undertaken in 2018 and 2019, however the reports were not finalised until June 2020. As such, monitoring reports were not submitted annually to the relevant stakeholders during the audit period. Biosis advised that the 2020 monitoring report was delayed due to COVID-19 travel restrictions between NSW and Victoria.</li> <li>• The Bird and Bat Adaptive Management Plan includes commitments to prepare and submit an annual report. A bird and bat monitoring report was prepared for the period 2018 to 2020 rather than annually as required by the Bird and Bat Adaptive Management Plan.</li> </ul>	<p>It is recommended that environmental performance reporting is undertaken in a timely manner and in accordance with the requirements of relevant plans.</p>



**Table 5.2 EPL Non-Compliances**

ID	Reference	Condition	Non-Compliance	Recommended Action
2021-NC-03	O4.1	The licensee must have adequate fire prevention measures in place and develop procedures to manage fires which must be documented in the Pollution Incident Response Management Plan prepared for the premises.	<b>2021-NC-03:</b> The <i>Protection of the Environment Operations (General) Regulation (2009)</i> , Section 98E(2), requires the Pollution Incident Response Management Plan to be tested every 12 months. During the audit period, the Pollution Incident Response Management Plan was tested on 1 June 2021; testing of the plan was not undertaken in 2020 or 2019.	It is recommended that testing of the Pollution Incident Response Management Plan is undertaken annually.

**Table 5.3 Project Approval Opportunities for Improvement**

ID	Reference	Condition	Opportunity for Improvement
2021-OFI-01	03.16	<p><b>Operating Conditions</b></p> <p>The Proponent must:</p> <ul style="list-style-type: none"> <li>a) minimise any soil erosion associated with the construction and decommissioning of the project by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004), or its latest version;</li> <li>b) ensure all waterway crossings are constructed in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), or their latest version;</li> <li>c) store and handle all dangerous goods or hazardous materials on site, and ensure the concrete batching plants and substations on site are bunded, in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; and</li> <li>d) minimise any hydrocarbon spills on site, and clean up any spills as soon as possible after they occur.</li> </ul>	<p><b>2021-OFI-01:</b> Scouring was identified on the site access road off Daydream Mine Road, south of the Operations and Maintenance Facility (<b>Appendix C</b>, Photo C11). It is recommended that permanent drainage controls within this area of the site be reviewed and strengthened to minimise erosion.</p>

2021-OFI-02 2021-OFI-03	03.18	<p><b>Biodiversity Management Plan</b></p> <p>Prior to the commencement of construction, the Proponent must prepare a Biodiversity Management Plan for the project in consultation with OEH, DI Lands and local leaseholders on site, and to the satisfaction of the Secretary. This plan must:</p> <p>a) include updated baseline mapping of the vegetation communities and key fauna habitat onsite;</p> <p>b) clearly identify the areas on site that would be disturbed;</p> <p>c) include a:</p> <ul style="list-style-type: none"> <li>description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>minimising the amount of clearing within the approved project footprint;</li> <li>minimising the loss of key fauna habitat;</li> <li>minimising the impacts of fauna on site, including undertaking pre-clearance surveys;</li> <li>rehabilitating and revegetating temporary disturbance areas;</li> <li>protecting vegetation and fauna habitat outside the approved disturbance area;</li> <li>maximising the salvage of resources within the approved disturbance area – including rocks, vegetation and soil resources – for beneficial reuse (including revegetation and fauna habitat enhancement) on site;</li> <li>collecting and propagating seed (where relevant);</li> <li>controlling weeds and feral pests;</li> <li>controlling erosion;</li> <li>controlling access; and</li> <li>bushfire management;</li> </ul> </li> <li>Recovery Plan for enhancing the conservation value of the Porcupine Grass Sparse Woodland CEEC on site; that includes <ul style="list-style-type: none"> <li>Baseline data on the vegetation and fauna habitat within the community; and</li> <li>Detailed performance and completion criteria for evaluating the performance of the enhancement activities;</li> </ul> </li> <li>Barrier Range Dragon Management Plan for minimising any impacts on the species on site and enhancing the potential habitat for this species;</li> <li>Goat Management Plan for the site;</li> <li>Vegetation Management Plan for restoring vegetation and habitat in the temporary disturbance areas and clearing vegetation for transmission line maintenance; and</li> </ul>	<p><b>2021-OFI-02:</b> In response to consultation undertaken with BCD, it is recommended that the 2021 review of the Biodiversity Adaptive Management Plan is undertaken in consultation with the agencies and stakeholders nominated in this condition (OEH, DI Lands and local leaseholders on site) prior to submission to DPIE for approval.</p> <p><b>2021-OFI-03:</b> Undertake regular engagement with leaseholders on mustering arrangements to ensure goats continue to be excluded from Area 7.</p>
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ID	Reference	Condition	Opportunity for Improvement
		<ul style="list-style-type: none"> <li>Include a detailed program to monitor and report on the performance of these measures.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p>	
2021-OFI-04	03.19	<p><b>Bird and Bat Adaptive Management Plan</b></p> <p>Prior to the construction of any wind turbines, the Proponent must prepare a Bird and Bat Adaptive Management Plan for the project in consultation with OEH to the satisfaction of the Secretary. This program must include:</p> <ol style="list-style-type: none"> <li>baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could potentially be affected by the project;</li> <li>a detailed description of the measures that would be implemented on site for minimising bird and bat strike during the project, including: <ul style="list-style-type: none"> <li>locating turbines as far as possible away from any raptor nests;</li> <li>minimising the availability of raptor perches;</li> <li>prompt carcass removal;</li> <li>controlling pests;</li> <li>using best practice methods for bat deterrence; and</li> <li>adaptive management of turbines to reduce mortality; and</li> </ul> </li> <li>trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations, and the potential implementation of measures to enhance or protect these species or populations in the locality; and</li> <li>a detailed program to monitor and report on the effectiveness of these measures, and any bird or bat strikes on site.</li> </ol> <p>Following the Secretary's approval, the Proponent must implement the Bird and Bat Adaptive Management Plan, and incorporate it into the Biodiversity Management Plan.</p>	<p><b>2021-OFI-04:</b> In response to consultation undertaken with BCD, it is recommended that the Bird and Bat Adaptive Management Plan specify that the carcass persistence autumn trials be undertaken in March of each year.</p>

2021-OFI-05	03.21	<p><b>Heritage Management Plan</b></p> <p>Prior to the commencement of construction, the Proponent must prepare a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</li> <li>b) be prepared in consultation with OEH, Aboriginal stakeholders (in relation to Aboriginal heritage) and any local historical organisations (in relation to historical heritage);</li> <li>c) include updated baseline mapping of the heritage items on site (see the figures and tables in Appendix 6);</li> <li>d) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>• managing the discovery of human remains or previously unidentified heritage items;</li> <li>• conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out; and</li> <li>• ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site;</li> </ul> </li> <li>e) include the following for the management of Aboriginal heritage: <ul style="list-style-type: none"> <li>• a description of the measures that would be implemented to: <ul style="list-style-type: none"> <li>- protect the heritage items outside the project disturbance area;</li> <li>- minimise and manage the impacts of the project on heritage items within the disturbance area, including: <ul style="list-style-type: none"> <li>○ any proposed archaeological investigations and/or salvage measures; and</li> <li>○ a strategy for the long-term management of any items or material that are collected during any of these archaeological or works;</li> </ul> </li> <li>- monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project;</li> <li>- maintain and manage reasonable access for Aboriginal stakeholders to heritage items on site; and</li> <li>- provide for ongoing consultation with Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage on site;</li> </ul> </li> <li>f) include the following for the management of historic heritage: <ul style="list-style-type: none"> <li>• a description of the measures that would be implemented to: <ul style="list-style-type: none"> <li>- protect the heritage items outside the project disturbance area;</li> </ul> </li> </ul> </li> </ul> </li></ul>	<p><b>2021-OFI-05:</b> The Operational Heritage Management Plan specifies that the boundaries of all Aboriginal heritage sites within the Project disturbance area must be clearly marked with star pickets or pegs and highly visible flagging tape. During the site inspection, it was noted that Aboriginal Heritage site 23-4-0183 was marked with a stake, but not protected by flagging tape (<b>Appendix C</b>, Photo C5). While the site is located at the edge of the area of disturbance, it is recommended that flagging tape is installed around the perimeter to minimise the risk of impact. AGL advised that consultation is being undertaken with Broken Hill Local Aboriginal Land Council to determine the preferred controls for protection of Aboriginal Heritage sites.</p>
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ID	Reference	Condition	Opportunity for Improvement
		<ul style="list-style-type: none"> <li>- minimise and manage the impacts of the project on heritage items within the disturbance area, including:               <ul style="list-style-type: none"> <li>o archaeological test excavations or salvage of all sites of local significance in accordance with the NSW Heritage Manual; and</li> <li>o photographic and archival recording of all heritage items that would be affected by the project; and monitor and report on the effectiveness of these measures and any heritage impacts of the project.</li> </ul> </li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>	
2021-OFI-06	03.36	<p><b>Progressive Rehabilitation:</b> The Proponent must</p> <ul style="list-style-type: none"> <li>a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</li> <li>b) minimise the total area exposed at any time; and</li> </ul> <p>employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	<p><b>2021-OFI-06:</b> It was observed during the site inspection that aggregate remained in situ at the former Crusher Pit site and rehabilitation was not significantly progressed (<b>Appendix C</b>, Photos C10). AGL advised that the surplus aggregate has been retained for the planned rectification of the access roads as detailed in the Defects Register. It is recommended that the Defects Register be revised to reflect the staged rehabilitation of the Crusher Pit site.</p>

## Appendix A Previous Audit Recommendations – 2021 IEA Verification

### A1. 2018 IEA Recommendations, Opportunities for Improvement and 2021 IEA Verification

Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
02.09	<p><b>Final Layout Plans:</b> Prior to the commencement of construction (apart from upgrades to the public road network and pre-construction minor works), the Proponent must submit detailed plans of the final layout of the project to the Secretary, including:</p> <ul style="list-style-type: none"> <li>a) details on the micro-siting of any wind turbines and/or ancillary</li> <li>b) identification of impacted vegetation communities and threatened fauna locations and habitat;</li> <li>c) identification of impacted heritage items; and</li> <li>d) the GPS coordinates of the final wind turbine locations.</li> </ul> <p>Should the final layout plans identify any increase in impacts to biodiversity or heritage items than those identified in the EA, the Proponent must seek further approval from the Secretary.</p> <p>Note: If the construction of the project is to be staged, then the provision of these plans may be staged.</p>	<p><b>2018 IEA OFI 08</b></p> <p>Submit the latest Final Layout Plan (Rev 5) to the DPE.</p>	<p><b>2018 IEA OFI 08 – Closed</b></p> <p>During the 2021 IEA audit period, minor changes to site access roads resulted in a further revision of the final layout (Rev X1) which was submitted to DPIE on 18 November 2019.</p>
02.18	<p><b>Community Enhancement:</b> Within 6 months of the commencement of construction, the Proponent must prepare a Community Enhancement Program for the project to the satisfaction of the Secretary. This program must:</p> <ul style="list-style-type: none"> <li>a) be prepared in consultation with Broken Hill City Council, the Silverton Village Committee and the Community Consultative Committee for the project;</li> <li>b) establish clear governance arrangements for the Silverton Community Fund; and</li> <li>c) describe the measures that would be implemented to give effect to the commitments in Appendix 3.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Community Enhancement Program.</p>	<p><b>2018 IEA OFI 09</b></p> <p>Confirm with DPE as to whether formal approval of the Program is required.</p>	<p><b>2018 IEA OFI 09 – Closed</b></p> <p>The auditor sighted a letter from DPIE to AGL (18 December 2018) confirming approval of the Community Enhancement Program for the Silverton Wind Farm.</p>

03.16	<p><b>Operating Conditions:</b> The Proponent must:</p> <ul style="list-style-type: none"> <li>a) minimise any soil erosion associated with the construction and decommissioning of the project by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004), or its latest version;</li> <li>b) ensure all waterway crossings are constructed in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), or their latest version;</li> <li>c) store and handle all dangerous goods or hazardous materials on site, and ensure the concrete batching plants and substations on site are bunded, in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; and</li> <li>d) minimise any hydrocarbon spills on site, and clean up any spills as soon as possible after they occur.</li> </ul>	<p><b>2018 IEA REC 01</b> Install adequate and permanent drainage structures for the access roads across the Wind farm site to manage erosion and sediment control risks. It would be expected that this would include: the input of an Erosion and Sediment control expert; a survey across the site to identify all areas of concern and risk rank them according to potential impact; and progressively construct suitable controls across the site. Priority should be given to areas within and surrounding CEECs, such as in Area 7.</p> <p><b>2018 IEA REC 02</b> Conduct an assessment (or audit) to ensure/confirm that designed controls (culverts and drainage lines) are installed as required by the design and in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), across the site. Install appropriate crossings as required.</p> <p><b>2018 IEA OFI 10</b> Review erosion and sediment controls across the site in coordination with the recommendation to review drainage structures under Schedule 3, Condition 16, PA 08_0022.</p> <p><b>2018 IEA OFI 11</b> Review drainage along the Connection Works access track and implement controls to ensure drainage is directed off the track to minimise erosion, particularly where there exists long runs on steeper gradients.</p>	<p><b>2018 IEA REC 01 – Closed</b> The auditor sighted an email from Wallbridge Gilbert Aztec (drainage engineer) to AGL (8 September 2020) confirming that remedial soil erosion measures associated with turnouts were completed in accordance with recommendations. AGL advised that Facility Practical Completion was formally awarded on 31 May 2021. Following revision of the ‘As Constructed’ drawings to address the Defects Register, the drawings will be provided to DPIE.</p> <p><b>2018 IEA REC 02 – Closed</b> Refer to the response for 2018 IEA REC 01.</p> <p><b>2018 IEA OFI 10 – Closed</b> Refer to the response for 2018 IEA REC 01.</p> <p><b>2018 IEA OFI 11 – Closed</b> Refer to the response for 2018 IEA REC 01.</p>
03.17	<p><b>Operating Conditions:</b> The Proponent must:</p>	<p><b>2018 IEA OFI 12</b></p>	<p><b>2018 IEA OFI 12 – Closed</b></p>



Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
	<p>a) ensure that no more than</p> <ul style="list-style-type: none"> <li>0.81 hectares of Porcupine Grass Sparse Woodland CEEC; and</li> <li>0.54 hectares of the Mulga/Red Mallee Shrubland and Chenopod – Red Mallee Woodland/Shrubland; is cleared for the project, unless the Secretary agrees otherwise;</li> </ul> <p>b) ensure wind turbines are located as far as possible, but at least 200 metres, from raptor nests unless the Secretary agrees otherwise;</p> <p>c) ensure no development occurs in mapped Barrier Range Dragon habitat hotspots (see figure in Appendix 5);</p> <p>d) locate wind turbines as far as practicable away from treed vegetation, rocky outcrops, caves or disused mine shafts/sites;</p> <p>e) minimise:</p> <ul style="list-style-type: none"> <li>impacts on the Barrier Range Dragon;</li> <li>impacts on threatened bird and bat populations;</li> <li>the clearing of native woodland vegetation and fauna habitat, in particular spinifex habitat, standing dead trees and woody habitat and high biodiversity value vegetation communities; and</li> </ul> <p>f) enhance the Porcupine Grass Sparse Woodland CEEC on site (see figure in Appendix 5) to ensure there is a net gain in the conservation value of this community.</p>	<p>AGL to confirm clearing limits through a quality review of data utilised in the development of the Porcupine Grass Sparse Woodland Clearance Register.</p> <p><b>2018 IEA REC 03</b> Finalise and Implement the Porcupine Grass Sparse Woodland Recovery Plan so as to demonstrate the protection and enhancement of the Porcupine Grass Sparse Woodland CEEC on site.</p>	<p>Adequate evidence was sighted by the auditor as part of the 2021 IEA to verify that the quality review was completed by Biosis on 20 March 2019.</p> <p><b>2018 IEA REC 03 – Closed</b> The Porcupine Grass Sparse Woodland Recovery Plan was approved by DPIE on 20 December 2018.</p>

03.18	<p><b>Biodiversity Management Plan:</b> Prior to the commencement of construction, the Proponent must prepare a Biodiversity Management Plan for the project in consultation with OEH, DI Lands and local leaseholders on site, and to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>a) include updated baseline mapping of the vegetation communities and key fauna habitat onsite;</li> <li>b) clearly identify the areas on site that would be disturbed;</li> <li>c) include a: <ul style="list-style-type: none"> <li>• description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>- minimising the amount of clearing within the approved project footprint;</li> <li>- minimising the loss of key fauna habitat;</li> <li>- minimising the impacts of fauna on site, including undertaking pre-clearance surveys;</li> <li>- rehabilitating and revegetating temporary disturbance areas;</li> <li>- protecting vegetation and fauna habitat outside the approved disturbance area;</li> <li>- maximising the salvage of resources within the approved disturbance area – including rocks, vegetation and soil resources – for beneficial reuse (including revegetation and fauna habitat enhancement) on site;</li> <li>- collecting and propagating seed (where relevant);</li> <li>- controlling weeds and feral pests;</li> <li>- controlling erosion, controlled access and bushfire management.</li> </ul> </li> <li>• Recovery Plan for enhancing the conservation value of the Porcupine Grass Sparse Woodland CEEC on site; that includes <ul style="list-style-type: none"> <li>- Baseline data on the vegetation and fauna habitat within the community;</li> <li>- Detailed performance and completion criteria for evaluating the performance of the enhancement activities;</li> </ul> </li> <li>• Barrier Range Dragon Management Plan for minimising any impacts on the species on site and enhancing the potential habitat for this species;</li> <li>• Goat Management Plan for the site;</li> <li>• Vegetation Management Plan for restoring vegetation and habitat in the temporary disturbance areas and clearing vegetation for transmission line maintenance; and</li> <li>• Include a detailed program to monitor and report on the performance of these measures.</li> </ul> </li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p>	<p><b>2018 IEA OFI 05</b> Provide further detail in the [Biodiversity Management Plan] (Section 5.9) in relation to the detail of erosion and sediment controls required. Current directions are generic and not easily interpreted as to what is expected.</p> <p><b>2018 IEA OFI 13</b> Ensure that in active construction areas flagging or other suitable delineation is maintained to define where CEECs, other sensitive areas and where there is a potential for vehicles to track onto native vegetation.</p> <p><b>2018 IEA OFI 14</b> Conduct more seed collection onsite to ensure sufficient seed storage for rehabilitation. Seeds collected from site should be routinely used in rehabilitation where topsoils are not available to spread out over disturbed areas.</p> <p><b>2018 IEA OFI 15</b> Update the Connection Works Construction Biodiversity Management Plan for Operations or pull out the requirements relating to post construction rehabilitation, restoration and weed control into an operational document so that they are not overlooked now that construction activities are complete.</p> <p><b>2018 IEA OFI 16</b> Implement controls for goats as part of the approved Goat Management Plan. Refer to recommendations for other conditions relating to rehabilitation and erosion and sediment control.</p>	<p><b>2018 IEA OFI 05 – Closed</b> Erosion and sediment control requirements are adequately addressed in the Operational Biodiversity Adaptive Management Plan and the Vegetation Management Plan.</p> <p><b>2018 IEA OFI 13 – Closed</b> Adequate evidence was provided to demonstrate that CEECs were appropriately delineated within active construction areas.</p> <p><b>2018 IEA OFI 14 – Closed</b> AGL and the Project Ecologist (Biosis) confirmed that native seed was collected in 2018 for rehabilitation works. However, due to the extended duration of the drought, there have been few opportunities for collection since 2018.</p> <p><b>2018 IEA OFI 15 – Closed</b> Practical completion of the Connection Works was achieved by TransGrid on 20 February 2018. As such, the Connection Works Construction Biodiversity Management Plan was not triggered during the 2021 IEA audit period.</p> <p><b>2018 IEA OFI 16 – Closed</b> Suitable evidence was provided to demonstrate implementation of the Goat Management Plan (refer to <b>Appendix B, Table B1, Condition 03.18</b>)</p>
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03.21	<p><b>Heritage Management Plan:</b> Prior to the commencement of construction, the Proponent must prepare a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</li> <li>b) be prepared in consultation with OEH, Aboriginal stakeholders (in relation to Aboriginal heritage) and any local historical organisations (in relation to historical heritage);</li> <li>c) include updated baseline mapping of the heritage items on site (see the figures and tables in Appendix 6);</li> <li>d) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>• managing the discovery of human remains or previously unidentified heritage items;</li> <li>• conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out; and</li> <li>• ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site;</li> </ul> </li> <li>e) include the following for the management of Aboriginal heritage: <ul style="list-style-type: none"> <li>• a description of the measures that would be implemented to: <ul style="list-style-type: none"> <li>- protect the heritage items outside the project disturbance area;</li> <li>- minimise and manage the impacts of the project on heritage items within the disturbance area, including: <ul style="list-style-type: none"> <li>▪ any proposed archaeological investigations and/or salvage measures; and</li> <li>▪ a strategy for the long-term management of any items or material that are collected during any of these archaeological or works;</li> </ul> </li> <li>- monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project;</li> <li>- maintain and manage reasonable access for Aboriginal stakeholders to heritage items on site; and</li> <li>- provide for ongoing consultation with Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage on site;</li> </ul> </li> <li>f) include the following for the management of historic heritage: <ul style="list-style-type: none"> <li>• a description of the measures that would be implemented to:</li> <li>• protect the heritage items outside the project disturbance area;</li> <li>• minimise and manage the impacts of the project on heritage items within the disturbance area, including:</li> <li>• archaeological test excavations or salvage of all sites of local significance in</li> </ul> </li> </ul> </li> </ul>	<p><b>2018 IEA OFI 17</b> Conduct a reconciliation of which aboriginal heritage items were impacted and update the Wind Farm Works HMP to reflect this.</p> <p><b>2018 IEA OFI 18</b> Update the Wind Farm Works HMP to include new aboriginal heritage items identified since March 2018 (both maps in Appendix B and list in Appendix C).</p>	<p><b>2018 IEA OFI 17 – Closed</b> The Operational Heritage Management Plan includes a reconciled list of Aboriginal heritage items that were impacted by construction works (refer to <b>Section 4.1, Table 3 and Table 4</b>)</p> <p><b>2018 IEA OFI 18 – Closed</b> The Operational Heritage Management Plan includes the Aboriginal heritage items that have been identified since March 2018 (refer to <b>Section 4.1, Table 4</b>).</p>
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Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
	<ul style="list-style-type: none"> <li>• accordance with the NSW Heritage Manual; and</li> <li>• photographic and archival recording of all heritage items that would be affected by the</li> <li>• project; and monitor and report on the effectiveness of these measures and any heritage</li> <li>• impacts of the project.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Heritage Management Plan.</p>		
03.24	<p><b>Road Upgrade and Maintenance Strategy:</b> Prior to carrying out any construction, or the decommissioning of the project, the Proponent must prepare a Road Upgrade and Maintenance Strategy for the project in consultation with RMS, DI Lands and Broken Hill City Council, to the satisfaction of the Secretary. The strategy must:</p> <p>a) identify the road upgrades required for the project; and</p> <p>b) include a program for:</p> <ul style="list-style-type: none"> <li>• the implementation of the road upgrades; and</li> <li>• the maintenance of the relevant sections of the road network following the upgrades.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Road Upgrade and Maintenance Strategy.</p>	<p><b>2018 IEA REC 04</b></p> <p>Ensure the Road Upgrade and Maintenance Strategy has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p>	<p><b>2018 IEA REC 04 – Closed</b></p> <p>Further review undertaken as part of the 2021 IEA determined that the Road Upgrade and Maintenance Strategy was prepared in accordance with the requirements of this condition and satisfies the DPIE conditions of approval. It is noted that following the receipt of the DPIE conditional approval, additional consultation was undertaken with RMS (now Transport for NSW). In response, the Road Upgrade and Maintenance Strategy was revised on 6 June, 30 June and 7 August 2017 and subsequently accepted by the RMS on 24 August 2017.</p>
03.25	<p><b>Road Upgrades and Maintenance:</b> The Proponent must carry out all the road works identified in the Road Upgrade and Maintenance Strategy to the satisfaction of the relevant roads authority.</p>	<p><b>2018 IEA OFI 19</b></p> <p>Continue working with RMS to complete the intersection upgrades at the Daydream Mine Road to the satisfaction of RMS.</p>	<p><b>2018 IEA OFI 19 – Closed</b></p> <p>AGL advised that the upgrades of Daydream Mine Road were completed in May 2019. Intersection upgrades were verified during the inspection on 10 June 2021.</p>

Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
03.27	<p><b>Traffic Management Plan:</b> Prior to the commencement of construction, the Proponent must prepare a Traffic Management Plan for the project, in consultation with RMS, DI Lands and Broken Hill city Council, and to the satisfaction of the Secretary. This plan must detail the measures that would be implemented to:</p> <p>a) minimise the traffic safety impacts of the projects and disruption to local road users during the construction and decommissioning of the project, including:</p> <ul style="list-style-type: none"> <li>• temporary traffic controls, including detours and signage;</li> <li>• notifying the local community about project-related traffic impacts;</li> <li>• responding to any emergency repair or maintenance requirements;</li> <li>• implementing a strategy for minimising the traffic impacts associated with the use of over-dimensional vehicles;</li> </ul> <p>b) ensure the project does not disrupt the use of any travelling stock route on site;</p> <p>c) comply with the traffic-related conditions in this approval; and</p> <p>d) include a drivers code of conduct that addresses:</p> <ul style="list-style-type: none"> <li>• travelling speed;</li> <li>• procedures to ensure that drivers implement safe driving practices, particularly if using roads through Broken Hill or Silverton; and</li> <li>• monitor and report on the effectiveness of these measures and the code of conduct.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Traffic Management Plan.</p>	<p><b>2018 IEA REC 05</b> Ensure the construction Traffic Management Plan has been updated to document the outcomes of the actions identified by the DPE in its approval of the Plan.</p> <p><b>2018 IEA OFI 07</b> Update Table 1.2 of the Traffic Management Plan to ensure the 'Addressed How?' column reflects where the condition is actually addressed in the document.</p>	<p><b>2018 IEA REC 05 – Closed</b> Further review undertaken as part of the 2021 IEA determined that the construction Traffic Management Plan satisfies the DPIE conditions of approval. It is noted that following the receipt of the DPIE conditional approval, additional consultation was undertaken with RMS (now Transport for NSW). In response, the construction Traffic Management Plan was revised on 6 June, 16 June, 30 June and 7 August 2017. The RMS confirmed on 24 August 2017 that the construction Traffic Management Plan was accepted.</p> <p><b>2018 IEA OFI 07 – Closed</b> Refer to the response for 2018 IEA REC 05.</p>
03.30	<p><b>Radiocommunications:</b> Prior to the commencement of construction, the Proponent must undertake a baseline assessment of radio communication services to assess the pre-existing signal strength at any residence within 5 kilometres of the site, in consultation with registered communications licence holders (including emergency services). If this assessment identifies the potential for interference as a result of the project, the Proponent must identify and implement reasonable and feasible mitigation measures to address any potential disruption in consultation with the landowner (where applicable). These measures must be implemented within 3 months of the completion of the baseline assessment, or as otherwise agreed by the Secretary.</p>	<p><b>2018 IEA REC 06</b> Ensure the recommendations within the baseline assessment of radio communication services are implemented.</p>	<p><b>2018 IEA REC 06 – Closed</b> Adequate evidence was provided by AGL to demonstrate that consultation was undertaken prior to commencement of construction with registered communications licence holders. Potential for interference was effectively mitigated through micro-sitting.</p>

Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
03.32	<p><b>Bushfire:</b> The Proponent must:</p> <p>a) ensure that the project:</p> <ul style="list-style-type: none"> <li>provides for asset protection in accordance with the RFS's Planning for Bushfire Protection 2006 (or its latest version);</li> <li>is suitably equipped to respond to any fires on site;</li> </ul> <p>b) develop procedures to manage potential fires on site, in consultation with the RFS; and</p> <p>c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.</p>	<p><b>2018 IEA OFI 20</b></p> <p>The site emergency response plan could include reference to the Silverton Wind Farm District Pre-Incident Plan prepared by NSW Rural Fire Services.</p>	<p><b>2018 IEA OFI 20 – Closed</b></p> <p>The Fire Management Plan was developed in consultation with the Silverton Rural Fire Service, the Rural Fire Service and the NSW Fire Brigade and the Fire and Rescue NSW. On this basis, the OFI is assessed as closed.</p>

03.36	<p><b>Progressive Rehabilitation:</b> The Proponent must</p> <ul style="list-style-type: none"> <li>a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</li> <li>b) minimise the total area exposed at any time; and</li> <li>c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</li> </ul>	<p><b>2018 IEA REC 07</b> Employ interim rehabilitation strategies as required of SH3COA36 to minimise soil erosion where permanent controls cannot be immediately completed. Specifically high risk areas e.g. steep cable runs and access roads in steep areas or in Area 7 should be prioritised.</p> <p><b>2018 IEA REC 08</b> Develop a documented approach with input from suitable experts for the ongoing rehabilitation of the site. This should define rehabilitation criteria over time; what would be done if rehabilitation fails; methods for signing off when rehabilitation has reached agreed rehabilitation criteria; and define progressive rehabilitation approaches. It is noted that the Draft Vegetation Management Plan addresses some aspects of the recommendation.</p> <p><b>2018 IEA REC 09</b> Large cleared and disturbed areas be provided with improved ERSED controls and rehabilitated progressively. This applies to laydown areas no longer required for construction; and the crusher area. Checks using rock would provide a longer term control and would likely be more effective.</p> <p><b>2018 IEA OFI 21</b> Ensure adequate weed monitoring is conducted after rain events. Suitable controls should be in place to control weeds identified. It is noted that the Vegetation Management Plan describes an approach to weed management and hence addresses some aspects of this OFI.</p>	<p><b>2018 IEA REC 07 – Closed</b> Interim rehabilitation strategies were implemented as demonstrated by the Site Rehabilitation Plan (22 August 2018).</p> <p><b>2018 IEA REC 08 – Closed</b> The Site Rehabilitation Plan (22 August 2018) and Vegetation Management Plan (20 December 2018) adequately address this recommendation.</p> <p><b>2018 IEA REC 09 – Closed</b> During the site inspection on 10 June 2021, it was noted that permanent erosion and sediment controls were generally installed as required. Rehabilitation and revegetation works were significantly progressed within the context of extended drought conditions. Opportunities for natural regeneration have been pursued where appropriate and twice-yearly monitoring is undertaken by the Project Ecologist to guide rehabilitation response.</p> <p><b>2018 IEA OFI 21 – Closed</b> The Vegetation Management Plan (20 December 2018) specifies that the Project Ecologist is to undertake weed monitoring following rain events. The Project Ecologist confirmed that there were two significant rain events during the audit period and post-event inspections identified additional weed species. The Project Ecologist advised that the Vegetation Monitoring Report</p>
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Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
			2020 will capture the additional weed species and control measures.



Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
04.01	<p><b>Environmental Management Strategy</b></p> <p>Prior to the commencement of construction, the Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> <li>provide the strategic framework for environmental management of the project;</li> <li>identify the statutory approvals that apply to the project;</li> <li>describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</li> <li>describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise;</li> <li>respond to any non-compliance;</li> <li>respond to emergencies; and</li> </ul> </li> <li>include: <ul style="list-style-type: none"> <li>copies of any strategies, plans and programs approved under the conditions of this approval; and</li> <li>a clear plan depicting all the monitoring to be carried out in relation to the project, including a table summarising all the monitoring and reporting obligations under the conditions of this approval.</li> </ul> </li> </ol> <p>Following the Secretary's approval, the Proponent must implement the Environmental Management Strategy.</p>	<p><b>2018 IEA OFI 01</b></p> <p>Whilst the OpEMS discusses monitoring and reporting, and commits to reporting by GE to AGL it is not clear what external reporting will be undertaken. Table 1 and 2 which summarise the monitoring requirements and reporting obligations of the MOD 3 project approval could also outline where/to whom the results will be reported and at what frequency the reporting will occur.</p> <p><b>2018 IEA OFI 02</b></p> <p>The table references throughout the OpEMS are incorrect and not synced with the table of contents. In addition the in-text references to tables throughout the OpEMS are not correct.</p> <p><b>2018 IEA OFI 03</b></p> <p>The Connection Works EMS does not clearly describe the procedures that would be implemented to receive, handle, respond to and record complaints. The EMS, in section 4.4.2, indicates that complaints from the community would be managed by AGL. This is consistent with the OpEMS however no complaints line or process for dealing with complaints is provided in the Connection Works EMS. Reference to the project website for phone and email details is all that is provided.</p> <p><b>2018 IEA OFI 04</b></p> <p>Include clear performance Objectives and Targets for rehabilitation of disturbed areas [within the Connection Works EMS].</p>	<p><b>2018 IEA OFI 01 – Closed</b></p> <p>Monitoring requirements are detailed in the aspect-specific plans which were prepared following the 2018 IEA.</p> <p><b>2018 IEA OFI 02 – Closed</b></p> <p>Correction of table references and the table of contents will occur during the scheduled update of the Operational Environmental Management Strategy.</p> <p><b>2018 IEA OFI 03 – Closed</b></p> <p>Practical completion of the Connection Works was achieved by TransGrid on 20 February 2018. As such, the Connection Works EMS was not triggered during the 2021 IEA audit period.</p> <p><b>2018 IEA OFI 04 – Closed</b></p> <p>Practical completion of the Connection Works was achieved by TransGrid on 20 February 2018. As such, the Connection Works EMS was not triggered during the 2021 IEA audit period.</p>

Ref	Condition	2018 IEA Recommendations and Opportunities for Improvement	2021 IEA Verification
04.06	<b>Regular Reporting:</b> The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	<p><b>2018 IEA REC 10</b> Provide regular reporting on environmental performance on the AGL Silverton Wind Farm website.</p> <p><b>2018 IEA REC 11</b> Update the Overview Environmental Management Strategy to outline the environmental performance reporting which will be provided to the public as per the reporting arrangements in the various plans prepared for the Project.</p>	<p><b>2018 IEA REC 10 – Closed</b> Regular reporting on environmental performance is demonstrated through the provision of monitoring reports, Community Consultative Committee presentations/minutes, and Environmental Performance Reports on the AGL Silverton Wind Farm website.</p> <p><b>2018 IEA REC 11 – Closed</b> The Overarching Environmental Management Strategy (18 April 2019) details the environmental performance reporting that will be publicly available (Refer to OEMS, <b>Section 3.1.3</b>).</p>
A3.05	<b>Solar Silverton Program:</b> Due to the heritage qualities of Silverton, not all residences may be suitable for installation of solar equipment, and the Proponent will ensure heritage issues are taken into account.	<p><b>2018 IEA OFI 22</b> Update the Silverton Wind Farm Community Enhancement Program to discuss how heritage issues will be taken into account when assessing whether residences are suitable for the installation of solar equipment.</p>	<p><b>2018 IEA OFI 22 – Closed</b> It was reported by AGL that heritage issues were not a barrier to the installation of solar panels. However, rooftops were not structurally suitable for solar panels in a limited number of residences. Where solar panels were not feasible, alternatives were identified in consultation with property owners including improvements to rooftops and the construction of dedicated structures to mount the panels.</p>

## Appendix B Compliance Assessment

### B1. Project Approval 08\_0022

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<b>SCHEDULE 2 ADMINISTRATIVE CONDITIONS</b>		
	<b>OBLIGATIONS TO MINIMISE HARM TO THE ENVIRONMENT</b>		
02.01	In addition to meeting the specific environmental performance criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the project.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Overarching Environmental Management Strategy, AGL (18 April 2019)</li> <li>• Silverton Wind Farm Operations Environmental Management Strategy, Ecology and Heritage Partners (21 December 2017)</li> <li>• Operational Biodiversity Adaptive Management Plan, Biosis (20 December 2018)</li> <li>• Porcupine Grass Sparse Woodland Recovery Plan, Biosis (20 December 2018)</li> <li>• Barrier Range Dragon Management Plan, Biosis (20 December 2018)</li> <li>• Goat Management Plan, Biosis (20 December 2018)</li> <li>• Vegetation Management Plan, Biosis (20 December 2018)</li> <li>• Bird and Bat Adaptive Management Plan, Biosis (5 May 2018)</li> <li>• Operational Heritage Management Plan (8 May 2019)</li> <li>• Fire Management Plan (29 April 2021)</li> <li>• Feral Pest Management Plan, Biosis (18 May 2021)</li> <li>• Pollution Incident Response Management Plan (11 June 2021)</li> <li>• Environmental Incident Register ('GE-STWF Environmental Incident Register')</li> <li>• Silverton Wind Farm Complaints Register.</li> </ul> <p><b>Finding:</b> Following completion of construction works, an Operations Environmental Management Strategy and supporting plans have been developed and implemented to manage environmental risks and achieve performance improvements. The plans have been developed in</p>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p>accordance with the Project Approval and capture reasonable and feasible measures to prevent and/or minimise material environmental harm.</p> <p>Compliance obligations arising from the Project Approval and EPL are managed through compliance management systems (GenSuite and SAP Compliance) which enable the tracking, escalation and closure of compliance obligations.</p> <p>Implementation was demonstrated through Environmental Performance Reporting, environmental monitoring, weekly inspections and regular community engagement.</p>	
	<b>TERMS OF APPROVAL</b>		
02.02	<p>The Proponent must carry out the project:</p> <p>a) generally in accordance with the EA; and</p> <p>b) in accordance with the conditions of this approval.</p> <p>Note: The general layout of the project is shown in Appendix 2.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Final Layout Plan (Rev X1), including ecological constraints and heritage items</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The Project Environmental Assessment proposed the construction and operations of 172 wind turbines. In accordance with the Final Layout Plan submitted to DPIE, the Proponent constructed 58 of turbines within approved locations. Approval to construct in Area 7 was assessed as part of the 2018 IEA and determined to be compliant. The Statement of Commitments detailed in the Project Environmental Assessment were largely captured or superseded by the Project Approval. During the audit period, there were no new areas of construction as compared to that which was assessed within the 2018 IEA.</p> <p>A detailed assessment of compliance against the Project Approval conditions is provided in this report.</p>	Compliant
02.03	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this approval must prevail to the extent of any inconsistency.	Noted.	
02.04	<p>The Proponent must comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of:</p> <p>a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this approval;</p> <p>b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Refer to relevant conditions for DPIE correspondence references.</li> </ul> <p><b>Finding:</b> AGL advised that all reasonable requirements of DPIE were complied with during the audit period. The auditor reviewed relevant</p>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	c) the implementation of any actions or measures contained in these documents.	correspondence sent by DPIE (detailed within respective conditions below) and confirmed that compliance was achieved against the requirements of this condition.	
	<b>LIMITS ON APPROVAL</b>		
02.05	<b>Lapse Date</b> If the Proponent has not physically commenced the project by 24 May 2018, this approval will lapse.	<b>Evidence</b> <ul style="list-style-type: none"> <li>2018 IEA.</li> </ul> <b>Finding:</b> The requirements of this condition were assessed within the scope of the 2018 IEA and determined to be compliant. As such, the condition is now closed.	Not Triggered
02.06	<b>Wind Turbines</b> The Proponent may construct, operate and replace or upgrade as necessary up to 167 wind turbines, but must not construct wind turbines B15, B17 and B21. Notes: <ul style="list-style-type: none"> <li>To avoid any doubt, the Proponent does not require additional approval to replace or upgrade wind turbines over time, as long as the replacement or upgrade is carried out in accordance with the conditions of this approval.</li> <li>To identify the approved turbines, see the figures and corresponding GPS coordinates in Appendix 2.</li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email from AGL to DPIE (18 November 2019), inclusive of the Final Layout Plan (Rev X1).</li> </ul> <b>Finding:</b> The general layout detailed in Appendix 2 of the Project Approval is for 172 turbines. The Proponent constructed 58 of turbines within approved locations. The Final Layout Plan (Rev X1) does not include reference to B15, B17 or B21 wind turbines.	Compliant
02.07	<b>Wind Turbine Height</b> No wind turbines may be greater than 180 metres in height (measured from above ground level to the blade tip).	<b>Evidence</b> <ul style="list-style-type: none"> <li>AGL spreadsheet, 'STWF_Turbine Locations' which includes the coordinates of each turbine, the Australian Height Datum of each structure at ground level and the height of each turbine tip.</li> </ul> <b>Finding:</b> On the basis of information provided by AGL, each constructed wind turbine is 175m in height (measured from the above ground level to the blade tip) and therefore complies with the requirements of this condition.	Compliant
02.08	<b>Micro-sitting Restrictions</b> The Proponent may micro-site the wind turbines and ancillary infrastructure without further approval provided: <ol style="list-style-type: none"> <li>no wind turbine is moved more than 250 metres from the relevant GPS coordinates in Appendix2;</li> </ol>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Final Layout Plan (Rev X1), including the micro sitting distance from the Approved Project coordinates (maximum 87.3m).</li> </ul> <b>Finding:</b> The Final Layout Plan (Rev X1) demonstrates that the maximum distance of any turbine from the Approved Project coordinates is 87.3m	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	b) no wind turbine is moved closer to residence VL6 from the relevant GPS coordinates in Appendix 2; c) the wind turbines and ancillary infrastructure do not result in any additional impacts to biodiversity values including high biodiversity value vegetation and threatened fauna; d) the wind turbines and ancillary infrastructure do not result in any additional impacts to heritage items; and e) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this approval.	(T48). Wind turbines in the vicinity of VL6 were not moved from the Approved Project coordinates. On the basis of the evidence provided, the requirements of this condition have been assessed as compliant and closed.	
02.09	<b>Final Layout Plans</b> Prior to the commencement of construction (apart from upgrades to the public road network and pre-construction minor works), the Proponent must submit detailed plans of the final layout of the project to the Secretary, including: a) details on the micro-siting of any wind turbines and/or ancillary b) identification of impacted vegetation communities and threatened fauna locations and habitat; c) identification of impacted heritage items; and d) the GPS coordinates of the final wind turbine locations.  Should the final layout plans identify any increase in impacts to biodiversity or heritage items than those identified in the EA, the Proponent must seek further approval from the Secretary.  Note: If the construction of the project is to be staged, then the provision of these plans may be staged.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email from AGL to DPIE (18 November 2019), inclusive of the Final Layout Plan (Rev X1).</li> </ul> <b>Finding:</b> The 2018 IEA determined that detailed plans of the final layout were submitted to DPIE prior to commencement of construction. It was noted in the 2018 IEA that the final layout was subsequently revised (Rev 5) in response to the micro-siting of T34, T35, T54 and T57. These changes were assessed as consistent with the requirements of this condition and did not increase impacts to biodiversity or heritage items. During the 2021 IEA audit period, minor changes to site access roads resulted in a further revision of the final layout (Rev X1) which was submitted to DPIE on 18 November 2019.	Compliant
	<b>NOTIFICATION TO THE DEPARTMENT</b>		
02.10	Prior to the commencement of the construction, operation and/or decommissioning of the project, the Proponent must notify the Department in writing of the date of commencement. If the project is to be staged, then the Proponent must: a) notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage; and b) inform the local community and the Community Consultation Committee about the proposed staging plans.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email from AGL to DPIE (21 July 2020) advising of the commencement of operation</li> <li>Letter from AGL to DPIE (4 June 2021) advising that full generation was achieved on 21 May 2020 and operations formally commenced on 16 December 2020</li> <li>Community Consultative Committee Meeting Minutes and presentations.</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<b>Finding:</b> The 2018 IEA assessed the construction stage notification and determined that the Project was compliant. During the audit period, formal commencement of operations occurred on 16 December 2020. AGL notified DPIE on 21 July 2020 of the commencement of operations.	
	<b>STRUCTURAL ADEQUACY</b>		
02.11	<p>The Proponent must ensure that:</p> <p>a) the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of IEC 61400-1 Wind turbines – Part 1: Design Requirements (or equivalent); and</p> <p>b) all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>Under Part 4A of the EP&amp;A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.</li> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the project.</li> </ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Type Certificate for the GE3.4-130 wind turbine installed at the wind farm confirming compliance to IEC 61400-1 "Wind Turbines - Part 1: Design requirements", Third Edition, 2005-08 and Amendment 1, 2010-10 (TUV NORD CERT GmbH, 13 August 2018)</li> <li>Sample of Mechanical Completion certificates confirming that the wind turbines have been constructed in accordance with the terms and conditions of the EPC Contract which references the relevant IEC standards</li> <li>Occupation Certificate, Blackett Maguire &amp; Goldsmith (13 March 2019) confirming the Operations and Maintenance Building was constructed in accordance with the relevant requirements of the Building Code of Australia (BCA).</li> </ul> <p><b>Finding:</b> Adequate evidence was provided by AGL to demonstrate that wind turbines and Operations and Maintenance Facility were constructed in accordance with IEC 61400-1 Wind turbines – Part 1: Design Requirements and the BCA, respectively. On this basis, the condition has been assessed as compliant and closed.</p>	Compliant
	<b>DEMOLITION</b>		
02.12	The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Interview with AGL Environmental Advisor.</li> </ul> <p><b>Finding:</b> AGL confirmed that demolition work was not undertaken during the audit period.</p>	Not Triggered
	<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>		
02.13	<b>Umberumberka Reservoir and Pipeline</b>	<b>Evidence</b>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	Unless Essential Energy agrees otherwise, the Proponent must ensure the project does not damage the Umberumberka Reservoir or Pipeline.	<ul style="list-style-type: none"> <li>Essential Water Asset Dilapidation Report (5 April 2017)</li> <li>Essential Water Asset Dilapidation Report – Post Construction (21 June 2019).</li> </ul> <p><b>Finding:</b> A dilapidation report was prepared prior to construction and on completion of construction. The post construction report determined that there was no further degradation to condition of the assets. As such the requirements of this condition have been satisfied.</p>	
02.14	Prior to carrying out any construction on site (apart from the upgrades to the public road network), the Proponent must carry out a dilapidation survey in consultation with Essential Energy of the relevant parts of the Umberumberka Reservoir and Pipeline within 2 kilometres of the approved development on site.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>2018 IEA.</li> </ul> <p><b>Finding:</b> The requirements of this condition were assessed within the scope of the 2018 IEA and determined to be compliant. As such, the condition is now closed.</p>	Not Triggered
02.15	<p><b>Repair or Relocation of Public Infrastructure</b></p> <p>Unless the Proponent and the applicable authority agree otherwise, the Proponent must:</p> <p>a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and</p> <p>b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project.</p> <p><i>Note: This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this approval.</i></p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Interview with AGL Environmental Advisor.</li> </ul> <p><b>Finding:</b> AGL advised that there was no damage to public infrastructure during the audit period.</p>	Not Triggered
	<b>OPERATION OF PLANT AND EQUIPMENT</b>		
02.16	<p>The Proponent must ensure that all plant and equipment used on site, or in connection with the project, is:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Sample of Certificates of Calibration (TEX Onsite) for current clampmeters and graduated wrenches</li> <li>Sample of Maintenance Checklists, GE Energy (16 October 2020, 8 November 2020 and 25 October 2020)</li> <li>'GE STWF_Monthly Vehicle Inspections' spreadsheet detailing the outcomes of monthly vehicle inspections.</li> </ul>	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<b>Finding:</b> Adequate evidence was provided by GE to demonstrate that plant and equipment was operated and maintained in a proper and efficient manner.	
	<b>UPDATING AND STAGING OF STRATEGIES, PLANS OR PROGRAMS</b>		
02.17	<p>With the approval of the Secretary, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this approval are updated on a regular basis, the Proponent may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With agreement of the Secretary, the Proponent may prepare minor revisions to any strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this approval.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that the project being carried out on site is covered by suitable strategies, plans or programs at all times.</li> <li>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</li> </ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Refer to relevant condition for evidence.</li> </ul> <p><b>Finding:</b> As demonstrated in the assessment of relevant conditions, strategies, plans and programs that were revised during the audit period were submitted to DPIE as required.</p>	Compliant
	<b>COMMUNITY ENHANCEMENT</b>		
02.18	<p>Within 6 months of the commencement of construction, the Proponent must prepare a Community Enhancement Program for the project to the satisfaction of the Secretary. This program must:</p> <ol style="list-style-type: none"> <li>be prepared in consultation with Broken Hill City Council, the Silverton Village Committee and the Community Consultative Committee for the project;</li> <li>establish clear governance arrangements for the Silverton Community Fund; and</li> <li>describe the measures that would be implemented to give effect to the commitments in Appendix 3.</li> </ol> <p>Following the Secretary's approval, the Proponent must implement the Community Enhancement Program.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Community Enhancement Program, AGL (November 2017)</li> <li>Letter from DPIE to AGL dated 19 December 2018 noting approval of the Silverton Wind Farm Community Enhancement Program.</li> </ul> <p><b>Finding:</b> Adequate evidence was provided by AGL to demonstrate that the Community Enhancement Program was prepared in accordance with the requirements of this condition and approved by DPIE.</p>	Compliant
	<b>SCHEDULE 3 ENVIRONMENTAL CONDITIONS – GENERAL</b>		
	<b>VISUAL</b>		

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
03.01	<p><b>Visual Impact Mitigation</b></p> <p>For a period of 3 years from the commencement of construction, the owner(s) of any residence or tourist accommodation facility within 6 kilometres of any wind turbine, may request additional visual mitigation measures at their residence. Upon receiving a written request from these owner(s), the Proponent must implement visual impact mitigation measures (such as landscaping and vegetation screening) at the residence (including its curtilage) in consultation with the landowner. These mitigation measures must be reasonable and feasible, directed towards reducing the visual impacts of the wind turbines on the residence (including its curtilage), and commensurate with the level of visual impact. The mitigation measures must be implemented within 12 months of receiving the written request, unless the Secretary agrees otherwise. If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral will be final and binding on both parties.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>To avoid any doubt, the visual impact mitigation measures must be aimed at reducing the visibility of the wind turbines from the residence and/or tourist accommodation facility and its curtilage. Mitigation measures are not required to be implemented to reduce the visibility of wind turbines from other locations on the property.</li> <li>In some cases, mitigation measures may not be warranted as the wind turbines would not be visible from the receiver or its curtilage.</li> <li>The identification of appropriate visual impact mitigation measures will be easier following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction, they should consider the merits of delaying this request until the wind turbines are visible from their location.</li> </ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Email from Pots 'n' Plants to AGL (28 November 2019) confirming that landscaping and visual screening was completed at 13 properties</li> <li>Silverton Wind Farm Modification 3 Visual Impact Assessment, Green Bean Design (15 July 2016).</li> </ul> <p><b>Finding:</b> Following wind farm construction on 4 April 2017 (minor works), residences or tourist accommodation facilities were able to request visual impact mitigation measures from 4 April 2017 to 4 April 2020. The Visual Impact Assessment prepared for Modification 3 determined that there were ten residential properties within 5km of the wind farm. An assessment by AGL identified a further two properties within 6km of the wind farm. Suitable evidence was provided to demonstrate that visual mitigation measures were completed at all 12 properties. On this basis, the requirements of the condition have been satisfied and closed.</p>	Compliant
03.02	<p>Prior to the commencement of construction, the Proponent must notify the relevant owners of the residences or tourist accommodation facility referred to in condition 1 above, that they have the right to request the Proponent to implement visual impact mitigation measures at their residence (including its curtilage) at any time within 3 years of the commencement of construction.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>2018 IEA</li> </ul> <p><b>Finding:</b> The requirements of this condition were assessed as compliant by the 2018 IEA. The condition was not triggered during the current audit period and has been assessed as closed.</p>	Not Triggered

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
03.03	<b>Visual Appearance</b> The Proponent must: <ul style="list-style-type: none"> <li>a) minimise the off-site visual impacts of the project;</li> <li>b) ensure the wind turbines are: <ul style="list-style-type: none"> <li>• painted off white/grey; and</li> <li>• finished with a surface treatment that minimises the potential for glare and reflection;</li> </ul> </li> <li>c) ensure the visual appearance of all ancillary infrastructure (including paint colours, specifications and screening) blends in as far as possible with the surrounding landscape; and</li> <li>d) not mount any advertising signs or logos on wind turbines or ancillary infrastructure.</li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>• Site inspection (10 June 2021).</li> </ul> <b>Finding:</b> During the site inspection on 10 June 2021, the wind turbines were observed to be painted off white and low glare. Ancillary infrastructure, including the Operations and Maintenance Facility and substation were sufficiently blended into the landscape and there were no advertising signs or logos on wind turbines or ancillary infrastructure.	Compliant
03.04	<b>Lighting</b> The Proponent must: <ul style="list-style-type: none"> <li>a) minimise the off-site lighting impacts of the project;</li> <li>b) ensure that all external lighting associated with the project: <ul style="list-style-type: none"> <li>• is installed as low intensity lighting (except where required for safety or emergency purposes);</li> <li>• does not shine above the horizontal;</li> <li>• uses best management practice for bat deterrence; and</li> <li>• complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.</li> </ul> </li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>• Site inspection (10 June 2021).</li> </ul> <b>Finding:</b> The remote location of the wind farm and the absence of lighting on the wind turbines is such that there are no off-site lighting impacts. During the audit period, it was reported by GE that additional lighting installations were limited to the Operations and Maintenance Building which is surrounded by hills and not visible off-site.	Compliant
03.05	<b>Shadow Flicker</b> The Proponent must ensure that shadow flicker from operational wind turbines does not exceed 30 hours per annum at any non-associated residence.	<b>Evidence</b> <ul style="list-style-type: none"> <li>• Silverton Wind Farm Modification 3, Visual Impact Assessment (V1 Final 15 July 2016)</li> <li>• Email from AGL to DPIE dated 18 November 2019 which included the Final Layout Plan (Rev X1).</li> </ul> <b>Finding:</b> The Visual Impact Assessment prepared as part of the Silverton Wind Farm – Modification 3 Environmental Assessment (July 2016) assessed the potential impacts of shadow flicker. The assessment, based on 172 wind turbines, determined that none of the non-associated residential dwellings surrounding the proposed wind turbines would experience shadow flicker in excess of 30 hours per year (Section 3.1.2). The final layout (X1) consists of 58 wind turbines which have been	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		constructed in approved locations. As such, the findings of the Visual Impact Assessment present a highly conservative assessment of shadow flicker. On this basis, the requirements of the condition have been satisfied and closed.	
	<b>NOISE</b>		
03.06	<b>Construction and Decommissioning Noise</b> The Proponent must: a) minimise the noise generated by the construction or decommissioning of the project, including any associated traffic noise; and b) ensure the noise generated by any construction or decommissioning activities is managed in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Traffic Management Plan (Construction) (7 August 2017)</li> <li>Silverton Wind Farm Complaints Register.</li> </ul> <b>Finding:</b> Measures to mitigate and manage construction noise are detailed in the construction Traffic Management Plan and implementation is demonstrated by the Weekly Environmental Inspection Checklists. There were no noise complaints received during the audit period.	Compliant
03.07	Unless the Secretary agrees otherwise, the Proponent must only undertake construction or decommissioning activities between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holidays.  The following construction or decommissioning activities may be undertaken outside these hours without the approval of the Secretary: <ul style="list-style-type: none"> <li>activities that are inaudible at non-associated residences;</li> <li>the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or</li> <li>emergency work to avoid the loss of life, property and/or material harm to the environment.</li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021</li> <li>Silverton Wind Farm Complaints Register.</li> </ul> <b>Finding:</b> Adequate evidence was provided by GE to demonstrate compliance with the requirements of this condition including weekly environmental inspections and the induction. GE advised that there were no construction or decommissioning activities undertaken outside of standard hours during the audit period. In addition, there were no complaints received during the audit period as relevant to this condition.	Compliant
03.08	<b>Operational Noise Criteria – Wind Turbines</b> The Proponent must ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 1 at any non-associated residence.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li> </ul> <b>Finding:</b> Sonos (November 2020) determined that the operational noise criteria were achieved at the selected non-associated residences. The	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																																																			
	<p><b>Table 1: Noise Criteria dB(A)</b></p> <table><tr><th rowspan="2">Residence ID</th><th colspan="10">Criterial (dB(A)) with Referenced to Hub Height Wind Speed (m/s)</th></tr><tr><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>9</th><th>10</th><th>11</th><th>12</th></tr><tr><td>VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 20</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>36</td><td>38</td></tr><tr><td>VL6</td><td>38</td><td>39</td><td>40</td><td>40</td><td>41</td><td>42</td><td>43</td><td>45</td><td>46</td></tr><tr><td>All other privately owned non-associated residences</td><td colspan="10">The higher of 35 dB(A), or the existing background noise level <math>L_{A90}</math> (10-minute) plus 5 dB(A)</td></tr></table> <p><i>Note: To interpret the land referred to in Table 1, see the applicable figures in Appendix 2.</i></p> <p>Noise generated by the operation of the wind turbines is to be measures in accordance with the relevant requirements of the South Australian Environmental Protection Authority’s Wind Farms – Environmental Noise Guidelines 2009 (or its latest version), as modified by the provisions in Appendix 4. If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the requirements in the NSW guideline.</p>	Residence ID	Criterial (dB(A)) with Referenced to Hub Height Wind Speed (m/s)										4	5	6	7	8	9	10	11	12	VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 20	35	35	35	35	35	35	35	36	38	VL6	38	39	40	40	41	42	43	45	46	All other privately owned non-associated residences	The higher of 35 dB(A), or the existing background noise level $L_{A90}$ (10-minute) plus 5 dB(A)										<p>residents (VL24a and VL6) were selected on the basis that compliance at the respective locations demonstrates compliance of the overall wind farm against the requirements of this condition. There were no tones detected at any wind speed or excessive low frequency noise and as such, penalty adjustments were not applied.</p> <p>Sonos (November 2020) noted that the measurement of noise was undertaken in accordance with the South Australian Environmental Protection Authority’s Wind Farms – Environmental Noise Guidelines 2009 (or its latest version), as modified by the provisions in Appendix 4 of the Project Approval.</p>	
Residence ID	Criterial (dB(A)) with Referenced to Hub Height Wind Speed (m/s)																																																					
	4	5	6	7	8	9	10	11	12																																													
VL9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 20	35	35	35	35	35	35	35	36	38																																													
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All other privately owned non-associated residences	The higher of 35 dB(A), or the existing background noise level $L_{A90}$ (10-minute) plus 5 dB(A)																																																					
03.09	<p><b>Operational Noise Criteria – Ancillary Infrastructure</b></p> <p>The Proponent must ensure that the noise generated by the operation of ancillary infrastructure does not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence.</p> <p>Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (or its equivalent) as modified by the provisions in Appendix 4.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020)</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding:</b> Sonos (November 2020) determined that the noise from ancillary equipment (substation) was not audible at the selected non-associated residences. The residents (VL24a and VL6) were selected on the basis that compliance at the respective locations demonstrates compliance of the overall wind farm against the requirements of this condition. During the site inspection, the auditor noted that there was no audible noise from ancillary infrastructure at the nearest non-associated residence.</p>	Compliant																																																			
03.10	<p><b>Operational Noise Monitoring</b></p> <p>Within 6 months of the commencement of operations, the Proponent must:</p> <ol style="list-style-type: none"><li>undertake noise monitoring to determine whether the project is complying with the relevant conditions of this approval; and</li><li>submit a copy of the monitoring results to the Department and the EPA.</li><li>The Proponent must undertake further noise monitoring of the project if required by the Secretary.</li></ol>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Letter from AGL to DPIE (4 June 2021) notifying DPIE that full generation was achieved on 21 May 2020 and operations formally commenced on 16 December 2020</li><li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020)</li></ul>	Compliant																																																			

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status											
		<ul style="list-style-type: none"> <li>Email correspondence from DPIE to AGL (11 January 2021) confirming receipt of the Silverton Wind Farm Noise Compliance Testing (November 2020) and noting that the Department has no comments</li> <li>Email correspondence from AGL to the EPA (11 December 2020), enclosing the Silverton Wind Farm Noise Compliance Testing report.</li> </ul> <p><b>Finding:</b> Adequate evidence was provided to demonstrate that operational noise monitoring was undertaken with six months of commencement of operations and submitted to relevant stakeholders. Reflecting the correspondence from DPIE on 11 January 2021, no further noise monitoring is required. As such, the requirements of this condition have been satisfied and are determined to be closed.</p>												
	<b>BLASTING</b>													
03.11	<b>Blasting Hours</b> The Proponent may only carry out blasting on site between 9 am and 5 pm Monday to Saturday. No blasting is allowed on Sundays or public holidays.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email correspondence from the Silverton Wind Farm Project Coordinator (24 May 2021) confirming that no blasting was undertaken during the audit period.</li> </ul>	Not Triggered											
03.12	<b>Blasting Criteria</b> The Proponent must ensure that any blasting carried out on site does not result in any exceedances of the criteria in Table 2.  <b>Table 2: Blasting Criteria</b> <table border="1"> <thead> <tr> <th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr> </thead> <tbody> <tr> <td rowspan="2">Any non-associated residence</td><td>120</td><td>10</td><td>0%</td></tr> <tr> <td>115</td><td>5</td><td>5% of the total number of blasts or events over a period of 12 months</td></tr> </tbody> </table>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Any non-associated residence	120	10	0%	115	5	5% of the total number of blasts or events over a period of 12 months	<b>Finding:</b> AGL advised that no blasting was undertaken during the audit period. As such, the condition was not triggered.	Not Triggered
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance											
Any non-associated residence	120	10	0%											
	115	5	5% of the total number of blasts or events over a period of 12 months											
03.13	<b>Air</b> The Proponent must minimise the: <ol style="list-style-type: none"> <li>dust and blast fume emissions of the project; and</li> <li>surface disturbance of the site.</li> </ol>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Site inspection (10 June 2021)</li> <li>Silverton Wind Farm Complaints Register.</li> </ul>	Compliant											

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p><b>Finding:</b> During the audit period, rehabilitation works were progressively undertaken which reduced the area of surface disturbance. Weekly environmental inspections undertaken during the audit period included consideration of dust emissions and mitigation measures. GE advised that there were no dust complaints received during the audit period. It is noted that there were high wind conditions during the site inspection and there was no evidence of dust emissions.</p>	
	<b>SOILS &amp; WATER</b>		
03.14	<p><b>Water Supply</b></p> <p>The Proponent must ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of its activities on site to match its available water supply.</p> <p>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the project.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Email correspondence from Essential Water to CATCON (18 July 2018) confirming an increase in water allocation to 120 ML</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The 2018 IEA noted that the project sought an initial water allocation of approximately 100 ML from Essential Water. In July 2018, this allocation was increased to 120 ML to allow completion of construction. There were no subsequent increases in water allocation required during the audit period.</p>	Compliant
03.15	<p><b>Water Pollution</b></p> <p>Unless an EPL authorises otherwise, the Proponent must comply with section 120 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Environmental Incident Register ('GE-STWF Environmental Incident Register')</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> There were three reported environmental incidents during the audit period, all of which were minor in nature and associated with hydraulic oil leaks. The incident response was adequate and there were no reported impact to waters.</p> <p>During the site inspection, there was no evidence of leaks, spills or discharges.</p>	Compliant
03.16	<p><b>Operating Conditions</b></p> <p>The Proponent must:</p>	<p><b>Evidence</b></p>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<p>a) minimise any soil erosion associated with the construction and decommissioning of the project by implementing the relevant mitigation measures in Managing Urban Stormwater: Soils and Construction Manual (Landcom 2004), or its latest version;</p> <p>b) ensure all waterway crossings are constructed in accordance with the relevant Water Guidelines for Controlled Activities on Waterfront Land (2012), or their latest version;</p> <p>c) store and handle all dangerous goods or hazardous materials on site, and ensure the concrete batching plants and substations on site are bunded, in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; and</p> <p>d) minimise any hydrocarbon spills on site, and clean up any spills as soon as possible after they occur.</p>	<ul style="list-style-type: none"> <li>Email correspondence from Wallbridge Gilbert Aztec (drainage engineer) to AGL (8 September 2020) confirming that remedial soil erosion measures associated with turnouts were completed in accordance with their recommendations</li> <li>Site inspection (10 June 2021), including assessment of erosion and sediment controls and inspection of dangerous goods/hazardous materials storage.</li> </ul> <p><b>Finding:</b></p> <p>a) Adequate evidence was provided by AGL to demonstrate that remedial soil erosion measures were implemented in accordance with design engineer recommendations. During the site inspection, it was noted that construction activities were complete and permanent drainage structures were largely established. Where required, access tracks were constructed with regularly spaced cross-banks including outlet protection (coir logs) (<b>Appendix C</b>, Photo C7 and C9). Table drains and banks were commonly installed on steep inclines to divert rainwater and prevent scour (<b>Appendix C</b>, Photo C8). Within Area 7, which includes the Porcupine Grass Sparse Woodland community, soil erosion was effectively managed and there was no evidence of sediment within the Critically Endangered Ecological Community (CEEC).</p> <p>b) The 2018 IEA determined that waterway crossings were designed by CATCON's civil designer WGA in accordance with the NSW Department of Primary Industries Office of Water – Guidelines for Instream Works on Waterfront Land. As part of the 2021 IEA, it was noted during the site inspection that all waterway crossings were constructed and there was no evidence of scouring or degradation.</p> <p>c) During the site inspection, chemicals were stored within bunded facilities or bunded storage cabinets (<b>Appendix C</b>, Photo C2). The concrete batching plant was decommissioned and the transformers within the substation were located within a concrete bund.</p> <p>d) There was no evidence of hydrocarbon spills during the site inspection (10 June 2021).</p>	<b>2021-OFI-01</b>



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<b>2021-OFI-01 (Table 5.3):</b> Scouring was identified on the site access road off Daydream Mine Road, south of the Operations and Maintenance Facility ( <b>Appendix C</b> , Photo C11). It is recommended that permanent drainage controls within this area of the site be reviewed and strengthened to minimise erosion.	
03.17	<b>Operating Conditions</b> The Proponent must: <ul style="list-style-type: none"> <li>a) ensure that no more than <ul style="list-style-type: none"> <li>• 0.81 hectares of Porcupine Grass Sparse Woodland CEEC; and</li> <li>• 0.54 hectares of the Mulga/Red Mallee Shrubland and Chenopod – Red Mallee Woodland/Shrubland; is cleared for the project, unless the Secretary agrees otherwise;</li> </ul> </li> <li>b) ensure wind turbines are located as far as possible, but at least 200 metres, from raptor nests unless the Secretary agrees otherwise;</li> <li>c) ensure no development occurs in mapped Barrier Range Dragon habitat hotspots (see figure in Appendix 5);</li> <li>d) locate wind turbines as far as practicable away from treed vegetation, rocky outcrops, caves or disused mine shafts/sites;</li> <li>e) minimise: <ul style="list-style-type: none"> <li>• impacts on the Barrier Range Dragon;</li> <li>• impacts on threatened bird and bat populations;</li> <li>• the clearing of native woodland vegetation and fauna habitat, in particular spinifex habitat, standing dead trees and woody habitat and high biodiversity value vegetation communities; and</li> </ul> </li> <li>f) enhance the Porcupine Grass Sparse Woodland CEEC on site (see figure in Appendix 5) to ensure there is a net gain in the conservation value of this community.</li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>• Porcupine Grass Sparse Woodland Recovery Plan (20 December 2018)</li> <li>• Vegetation Management Plan, Biosis (20 December 2018)</li> <li>• Bird and Bat Adaptive Management Plan, Biosis (5 May 2018)</li> <li>• Letter from DPIE to AGL (20 December 2018) approving the Operational Biodiversity Adaptive Management Plan, Porcupine Grass Sparse Woodland Recovery Plan, Barrier Range Dragon Management Plan, Goat Management Plan and Vegetation Management Plan</li> <li>• Letter from Biosis to CATCON (20 March 2019) confirming that a total of 5.68 ha of the Porcupine Grass Sparse Woodland community was cleared during construction</li> <li>• Mulga/Red Mallee Shrubland Clearance Register (STWF-12)</li> <li>• Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>• Vegetation Monitoring Report – 2018, Biosis (29 June 2020)</li> <li>• Vegetation Monitoring Report – 2019, Biosis (30 June 2020)</li> <li>• Letter from DPIE to GE Renewable Energy (22 July 2020), providing comments on the Vegetation Monitoring Reports (2018 and 2019)</li> <li>• Bird and Bat Monitoring 2018 – 2020, Biosis (24 February 2021)</li> <li>• Site inspection (10 June 2021), noting that two stray goats were identified within the fenced area.</li> </ul> <b>Finding:</b> <ul style="list-style-type: none"> <li>a) The 2018 IEA determined that DPIE approval was obtained to clear 6.81 ha of Porcupine Grass Sparse Woodland CEEC. As part of the 2021 IEA, the Mulga/Red Mallee Shrubland Clearance Register was sighted, noting that a total of 0.165 hectares of the community</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p>have been cleared during construction. AGL advised that no further clearing was undertaken during the 2021 IEA audit period.</p> <p>b) The 2018 IEA determined that there were no identified raptor nests within 200m of the closest turbine. Monitoring conducted during the 2021 IEA audit period (Bird and Bat Monitoring 2018-2020) similarly determined that there were no identified raptor nests within 200m of the nearest turbine (Section 3.5, Table 19).</p> <p>c) During the site inspection on 10 June 2021, there was no observed development in mapped Barrier Range Dragon habitat.</p> <p>d) The 2018 IEA determined that there were no caves or mine shafts or treed vegetation in the vicinity of wind turbines. Rocky outcrops were avoided as far as practicable.</p> <p>e) AGL reported that there was no clearing of native woodland vegetation and fauna habitat during the audit period. Operational impacts on threatened bird and bat populations were assessed within the Bird and Bat Monitoring 2018-2020 (Biosis). Biosis identified that significant decreases in flora abundance were attributed to the prolonged drought conditions rather than the effect of the wind farm.</p> <p>f) Monitoring undertaken by Biosis in 2018 and 2019 indicated that despite measures to enhance the Porcupine Grass Sparse Woodland community (including maintenance of fencing and exclusion of goats), the impacts of the extended drought were severe. It was advised by Biosis that three inspections were undertaken in 2020, including two post-rainfall event inspections. The post-rainfall event inspections identified additional weed species which are to be reflected in the revised Vegetation Management Plan.</p>	
03.18	<p><b>Biodiversity Management Plan</b></p> <p>Prior to the commencement of construction, the Proponent must prepare a Biodiversity Management Plan for the project in consultation with OEH, DI Lands and local leaseholders on site, and to the satisfaction of the Secretary. This plan must:</p> <p>a) include updated baseline mapping of the vegetation communities and key fauna habitat onsite;</p> <p>b) clearly identify the areas on site that would be disturbed;</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Operational Biodiversity Adaptive Management Plan 2018 – 2021, Biosis (20 December 2018)</li> <li>Letter from DPIE to AGL (20 December 2018) approving the Operational Biodiversity Adaptive Management Plan, Porcupine Grass Sparse Woodland Recovery Plan, Barrier Range Dragon Management Plan, Goat Management Plan and Vegetation Management Plan</li> </ul>	<p>Compliant</p> <p><b>2021-OFI-02</b></p> <p><b>2021-OFI-03</b></p>

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<p>c) include a:</p> <ul style="list-style-type: none"> <li>description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>minimising the amount of clearing within the approved project footprint;</li> <li>minimising the loss of key fauna habitat;</li> <li>minimising the impacts of fauna on site, including undertaking pre-clearance surveys;</li> <li>rehabilitating and revegetating temporary disturbance areas;</li> <li>protecting vegetation and fauna habitat outside the approved disturbance area;</li> <li>maximising the salvage of resources within the approved disturbance area – including rocks, vegetation and soil resources – for beneficial reuse (including revegetation and fauna habitat enhancement) on site;</li> <li>collecting and propagating seed (where relevant);</li> <li>controlling weeds and feral pests;</li> <li>controlling erosion;</li> <li>controlling access; and</li> <li>bushfire management;</li> </ul> </li> <li>Recovery Plan for enhancing the conservation value of the Porcupine Grass Sparse Woodland CEEC on site; that includes <ul style="list-style-type: none"> <li>Baseline data on the vegetation and fauna habitat within the community; and</li> <li>Detailed performance and completion criteria for evaluating the performance of the enhancement activities;</li> </ul> </li> <li>Barrier Range Dragon Management Plan for minimising any impacts on the species on site and enhancing the potential habitat for this species;</li> <li>Goat Management Plan for the site;</li> <li>Vegetation Management Plan for restoring vegetation and habitat in the temporary disturbance areas and clearing vegetation for transmission line maintenance; and</li> <li>Include a detailed program to monitor and report on the performance of these measures.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Biodiversity Management Plan.</p>	<ul style="list-style-type: none"> <li>Porcupine Grass Sparse Woodland Recovery Plan, Biosis (20 December 2018)</li> <li>Barrier Range Dragon Management Plan, Biosis (20 December 2018)</li> <li>Goat Management Plan, Biosis (20 December 2018)</li> <li>Vegetation Management Plan, Biosis (20 December 2018)</li> <li>Feral Pest Management Plan, Biosis (18 May 2021)</li> <li>Letter from DPIE to AGL (24 May 2021) confirming that the plan is generally consistent with Condition 03.18(c)</li> <li>Mulga/Red Mallee Shrubland Clearance Register (STWF-12)</li> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021), including surveillance monitoring of goats</li> <li>Sample of Wind Farm Update reports prepared by Jacobs (1 May 2017, 16 July 2017 and 11 March 2021), including delineation of CEECs</li> <li>Vegetation Monitoring Report – 2018, Biosis (29 June 2020)</li> <li>Vegetation Monitoring Report – 2019, Biosis (30 June 2020)</li> <li>Sample of Vehicle and Machinery Hygiene/Decontamination Checklists (11 May 2020 and 24 January 2020)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021.</li> </ul> <p><b>Finding (Documentation):</b> During the audit period, the Operational Biodiversity Adaptive Management Plan was finalised and approved by DPIE on 20 December 2018. The Biodiversity Adaptive Management Plan adequately addresses the requirements of this condition.</p> <p><b>Finding (Implementation):</b> Implementation of the Biodiversity Adaptive Management Plan was evidenced as follows:</p> <ul style="list-style-type: none"> <li>Induction program including comprehensive information on bird and bat protocols, goat management, and protection measures as relevant to the Porcupine Grass Sparse Woodland and the Barrier Range Dragon</li> </ul>	

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<ul style="list-style-type: none"> <li>Baseline mapping of vegetation and weeds (refer to the Vegetation Monitoring Reports)</li> <li>Weekly environmental inspections</li> <li>Rehabilitation and weed monitoring inspections</li> <li>Speed restrictions within the Barrier Range Dragon habitat</li> <li>Fencing around Area 7 and goat exclusion practices (noting that goats are sporadically identified within the exclusion zone)</li> <li>Erosion and sediment controls</li> <li>Weed hygiene protocol.</li> </ul> <p><b>2021-OFI-02 (Table 5.3):</b> In response to consultation undertaken with BCD, it is recommended that the 2021 review of the Biodiversity Adaptive Management Plan is undertaken in consultation with the agencies and stakeholders nominated in this condition (OEH, DI Lands and local leaseholders on site) prior to submission to DPIE for approval.</p> <p><b>2021-OFI-03 (Table 5.3):</b> Undertake regular engagement with leaseholders on mustering arrangements to ensure goats continue to be excluded from Area 7.</p> <p><i>Note: Refer to Condition 04.09 for audit findings relating to the reporting requirements of the Operational Biodiversity Adaptive Management Plan.</i></p>	
03.19	<p><b>Bird and Bat Adaptive Management Plan</b></p> <p>Prior to the construction of any wind turbines, the Proponent must prepare a Bird and Bat Adaptive Management Plan for the project in consultation with OEH to the satisfaction of the Secretary. This program must include:</p> <p>e) baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could potentially be affected by the project;</p> <p>f) a detailed description of the measures that would be implemented on site for minimising bird and bat strike during the project, including:</p> <ul style="list-style-type: none"> <li>locating turbines as far as possible away from any raptor nests;</li> <li>minimising the availability of raptor perches;</li> <li>prompt carcass removal;</li> <li>controlling pests;</li> </ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Bird and Bat Adaptive Management Plan, Biosis (5 May 2018)</li> <li>Letter from DPIE to AGL (4 May 2018) approving the Bird and Bat Adaptive Management Plan</li> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Bird and Bat Monitoring 2018 – 2020, Biosis (24 February 2021)</li> <li>Letter from DPIE to AGL (1 April 2021) confirming that the Department reviewed the Bird and Bat Monitoring 2018 – 2020 report with not further comments</li> </ul>	<p>Compliant</p> <p><b>2021-OFI-04</b></p>

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<ul style="list-style-type: none"> <li>• using best practice methods for bat deterrence; and</li> <li>• adaptive management of turbines to reduce mortality; and</li> </ul> <p>g) trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations, and the potential implementation of measures to enhance or protect these species or populations in the locality; and</p> <p>h) a detailed program to monitor and report on the effectiveness of these measures, and any bird or bat strikes on site.</p> <p>Following the Secretary's approval, the Proponent must implement the Bird and Bat Adaptive Management Plan, and incorporate it into the Biodiversity Management Plan.</p>	<ul style="list-style-type: none"> <li>• AGL spreadsheet, 'Silverton Year 2 May 2021' detailing flora carcasses</li> <li>• Silverton Wind Farm GE EHS Induction Training 2021, including bat and bird protocols and control measures.</li> </ul> <p><b>Finding (Documentation):</b> The 2018 IEA determined that the Bird and Bat Adaptive Management Plan was prepared prior to construction of wind turbines and approved by DPIE on 2 May 2018.</p> <p>BCD informed the auditor on 25 May 2021 that during the preparation of the Bird and Bat Adaptive Management Plan, BCD requested the inclusion of a bat utilisation survey in March of each year. Biosis advised that due to an oversight, this specific request to conduct the survey in March was not reflected in the final plan dated 5 May 2018 and approved by DPIE. Rather, the Bird and Bat Adaptive Management Plan requires the annual bat utilisation survey is to be undertaken in autumn (March to May). The autumn bat utilisation surveys were subsequently conducted by Biosis in May 2019 and April/May 2020. During the BCD review of the Bird and Bat Monitoring 2018 – 2020, the timing of the bat utilisation survey was identified by BCD and communicated to Biosis. Biosis confirmed during the audit that the 2021 bat utilisation survey was completed in March as per the BCD request.</p> <p><b>Finding (Implementation):</b> Implementation of the Bird and Bat Adaptive Management Plan during the audit period was demonstrated through the following evidence:</p> <ul style="list-style-type: none"> <li>• Induction training program including comprehensive information on bird and bat protocols, goat management, and protection measures as relevant to the Porcupine Grass Sparse Woodland</li> <li>• Weekly environmental inspections</li> <li>• Carcass monitoring</li> <li>• Ecological monitoring by the Project Ecologist.</li> </ul> <p><b>2021-OFI-04 (Table 5.3):</b> In response to consultation undertaken with BCD, it is recommended that the Bird and Bat Adaptive Management Plan</p>	

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status								
		<p>specify that the carcass persistence autumn trials be undertaken annually in March.</p> <p><i>Note: Audit findings relating to the reporting requirements of the Bird and Bat Adaptive Management Plan are detailed against condition 04.09.</i></p>									
	HERITAGE										
03.20	<p><b>Protection of Heritage Items</b></p> <p>The Proponent must ensure the project does not cause any direct or indirect impact on the heritage items identified in Table 3.</p> <p><b>Table 3: Heritage Items</b></p> <table><tr><th>Indigenous Heritage Item</th><th>Historic Heritage Item</th></tr><tr><td>SU 268/L3</td><td>SU 53/HS1</td></tr><tr><td>SU 277/L2</td><td>SU 235/HS1</td></tr><tr><td></td><td>SU 239/HS1</td></tr></table>	Indigenous Heritage Item	Historic Heritage Item	SU 268/L3	SU 53/HS1	SU 277/L2	SU 235/HS1		SU 239/HS1	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Operational Heritage Management Plan (8 May 2019)</li><li>Silverton Wind Farm GE EHS Induction Training 2021</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding:</b> The 2018 IEA determined that the project was designed to avoid direct or indirect impact to the heritage items nominated in this condition (Table 3).</p> <p>During the site inspection on 10 June 20201, it was noted that each of the nominated heritage items is located off-road and as such, not directly or indirectly impacted by the operation of the wind farm.</p>	Compliant
Indigenous Heritage Item	Historic Heritage Item										
SU 268/L3	SU 53/HS1										
SU 277/L2	SU 235/HS1										
	SU 239/HS1										
03.21	<p><b>Heritage Management Plan</b></p> <p>Prior to the commencement of construction, the Proponent must prepare a Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>g) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;</p> <p>h) be prepared in consultation with OEH, Aboriginal stakeholders (in relation to Aboriginal heritage) and any local historical organisations (in relation to historical heritage);</p> <p>i) include updated baseline mapping of the heritage items on site (see the figures and tables in Appendix 6);</p> <p>j) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"><li>managing the discovery of human remains or previously unidentified heritage items;</li><li>conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out; and</li></ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Operational Heritage Management Plan (8 May 2019)</li><li>Letter from DPIE to AGL (20 December 2018) approving the Operational Heritage Management Plan</li><li>Silverton Wind Farm GE EHS Induction Training 2021</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding (Documentation):</b> The 2018 IEA assessed the Construction Heritage Management Plan (Ecology &amp; Heritage Partners, February 2018) and determined that the document was prepared in accordance with the requirements of this condition.</p> <p>During the audit period, an Operational Heritage Management Plan was prepared and approved by DPIE on 20 December 2018. The Plan addresses the requirements of this condition and the 2018 IEA opportunities for improvement.</p>	Compliant <b>2021-OFI-05</b>								

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<ul style="list-style-type: none"> <li>ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site;</li> </ul> <p>k) include the following for the management of Aboriginal heritage:</p> <ul style="list-style-type: none"> <li>a description of the measures that would be implemented to: <ul style="list-style-type: none"> <li>protect the heritage items outside the project disturbance area;</li> <li>minimise and manage the impacts of the project on heritage items within the disturbance area, including: <ul style="list-style-type: none"> <li>any proposed archaeological investigations and/or salvage measures; and</li> <li>a strategy for the long-term management of any items or material that are collected during any of these archaeological or works;</li> </ul> </li> <li>monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project;</li> <li>maintain and manage reasonable access for Aboriginal stakeholders to heritage items on site; and</li> <li>provide for ongoing consultation with Aboriginal stakeholders in the conservation and management of Aboriginal cultural heritage on site;</li> </ul> <p>l) include the following for the management of historic heritage:</p> <ul style="list-style-type: none"> <li>a description of the measures that would be implemented to: <ul style="list-style-type: none"> <li>protect the heritage items outside the project disturbance area;</li> <li>minimise and manage the impacts of the project on heritage items within the disturbance area, including: <ul style="list-style-type: none"> <li>archaeological test excavations or salvage of all sites of local significance in accordance with the NSW Heritage Manual; and</li> <li>photographic and archival recording of all heritage items that would be affected by the project; and monitor and report on the effectiveness of these measures and any heritage impacts of the project.</li> </ul> </li> </ul> </li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Heritage Management Plan.</p> </li></ul>	<p><b>Finding (Implementation):</b> Notwithstanding the opportunity for improvement detailed below, implementation of the Operational Heritage Management Plan was evidenced through:</p> <ul style="list-style-type: none"> <li>Heritage inductions of employees, contractors and sub-contractors</li> <li>Display of heritage item photos and maps within the Operational and Maintenance Facility</li> <li>Engagement with the Broken Hill Local Aboriginal Land Council to facilitate access to Aboriginal heritage items.</li> </ul> <p><b>2021-OFI-05 (Table 5.3):</b> The Operational Heritage Management Plan specifies that the boundaries of all Aboriginal heritage sites within the Project disturbance area must be clearly marked with star pickets or pegs and highly visible flagging tape. During the site inspection, it was noted that site 23-4-0183 was marked with a stake, but not protected by flagging tape (<b>Appendix C</b>, Photo C5). While the site is located at the edge of the area of disturbance, it is recommended that flagging tape is installed around the perimeter to minimise the risk of impact. AGL has advised that consultation is being undertaken with the Broken Hill Local Aboriginal Land Council to determine the preferred controls for protection of Aboriginal Heritage sites.</p>	
	<b>TRAFFIC</b>		
03.22	<b>Designated Heavy or Over-Dimensional Vehicle Routes</b>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Traffic Management Plan (Construction), 10 August 2017</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	The Proponent must ensure that all heavy or over-dimensional vehicles entering or leaving the site use the designated heavy and over-dimensional vehicle route for the project (see the figure in Appendix 7).	<ul style="list-style-type: none"> <li>Traffic Management Plan (Operational), 4 June 2021.</li> </ul> <p><b>Finding:</b> Heavy vehicles and over-dimensional vehicles routes are detailed in the construction and operational Traffic Management Plans which are distributed to sub-contractors as required. It is noted that heavy and over-dimensional vehicles do not commonly access the Project during the operational phase.</p>	
03.23	The Proponent must minimise the use of the designated heavy and over-dimensional vehicle route to the west of the Silverton Road/Daydream Mine Road intersection during the project.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Traffic Management Plan (Construction), 10 August 2017</li> <li>Traffic Management Plan (Operational), 4 June 2021.</li> </ul> <p><b>Finding:</b> The requirements of this condition are reflected in the construction and operational Traffic Management Plans which are distributed to sub-contractors as required. It is noted that heavy and over-dimensional vehicles do not commonly access the Project during the operational phase.</p>	Compliant
03.24	<p><b>Road Upgrade and Maintenance Strategy</b></p> <p>Prior to carrying out any construction, or the decommissioning of the project, the Proponent must prepare a Road Upgrade and Maintenance Strategy for the project in consultation with RMS, DI Lands and Broken Hill City Council, to the satisfaction of the Secretary. The strategy must:</p> <p>a) identify the road upgrades required for the project; and</p> <p>b) include a program for:</p> <ul style="list-style-type: none"> <li>the implementation of the road upgrades; and</li> <li>the maintenance of the relevant sections of the road network following the upgrades.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Road Upgrade and Maintenance Strategy.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Road Upgrade and Maintenance Strategy (7 August 2017)</li> <li>Site inspection (10 June 2021)</li> <li>Letter from RMS to AGL (24 August 2017) confirming acceptance of the Road Upgrade and Maintenance Strategy</li> <li>Letter from RMS to AGL (9 October 2017) confirming acceptance of all preconstruction documentation.</li> </ul> <p><b>Finding (Documentation):</b> DPIE approved the Road Upgrade and Maintenance Strategy on 5 May 2017 subject to the following conditions:</p> <ul style="list-style-type: none"> <li><i>Confirm the 'adaptive' mitigation and maintenance strategies for roads used by the project within 14 days of the date of this letter</i></li> <li><i>Complete the proposed Silverton Road Trial, inclusive of a detailed action plan within 30 days of the date of this letter</i></li> <li><i>Finalise the adopted works on Silverton Road to address the outcomes of the Road Safety Audit within 30 days of the date of this letter</i></li> </ul>	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<ul style="list-style-type: none"> <li>Update the Traffic Management Plan and Road Upgrade and Maintenance Strategy to document the outcomes of the abovementioned actions within 40 days of the date of this letter.</li> </ul> <p>The 2018 IEA assessed this condition as 'not verified' and recommended that the Road Upgrade and Maintenance Strategy be updated to document how the DPIE conditions were addressed (2018 IEA REC 04).</p> <p>Further review was undertaken as part of the 2021 IEA, including interviews with the AGL Project Director – Silverton Wind Farm, Major Projects. The review determined that the Road Upgrade and Maintenance Strategy was prepared in accordance with the requirements of this condition and satisfies the DPIE conditions of approval. It is noted that following the receipt of the DPIE conditional approval, additional consultation was undertaken with RMS (now Transport for NSW). In response, the Road Upgrade and Maintenance Strategy was revised on 6 June, 30 June and 7 August 2017 and subsequently accepted by the RMS on 24 August 2017.</p> <p><b>Finding (Implementation):</b> The auditor sighted all required upgrade works during the site inspection and noted compliance with the requirements of the Road Upgrade and Maintenance Strategy and this condition.</p>	
03.25	<b>Road Upgrades and Maintenance</b> The Proponent must carry out all the road works identified in the Road Upgrade and Maintenance Strategy to the satisfaction of the relevant roads authority.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Road Upgrade and Maintenance Strategy (7 August 2017)</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The 2018 IEA determined that road works identified in the Road Upgrade and Maintenance Strategy were completed to the satisfaction of DPIE and the relevant road authority. An exception was noted with respect to the access intersection of Daydream Mine Road which was outstanding (2018 IEA OFI 19). AGL advised that the upgrades of Daydream Mine Road were completed in May 2019 and this was verified during the site inspection on 10 June 2021.</p>	Compliant
03.26	<b>Operating Conditions</b> The Proponent must ensure that: a) project-related traffic does not track mud or dirt onto the public road network;	<b>Evidence</b> <ul style="list-style-type: none"> <li>Traffic Management Plan (Construction), 10 August 2017</li> <li>Traffic Management Plan (Operational), 4 June 2021</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	b) loaded vehicles entering or leaving the site have their loads covered or contained; c) there is sufficient parking on site for all project-related traffic; d) deliveries to the site are scheduled to avoid heavy or over-dimensional vehicles passing through Broken Hill during peak hours (i.e. between 8:30 am and 9:30 am and 2:30 pm and 3:30 pm); and e) construction and decommissioning activities are coordinated to minimise any disruption to local tourist events.	<ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Silverton Wind Farm Complaints Register.</li> </ul> <p><b>Finding:</b> The construction and operational Traffic Management Plans address the requirements of this condition. Evidence of implementation is demonstrated through weekly environmental inspections. It is noted that there were two complaints received during the audit period relating to road restoration and the use of the main road in Silverton by heavy vehicles. As detailed in the Silverton Wind Farm Complaints Register, an adequate response was provided to address the concerns of the respective stakeholders and there were no repeat complaints.</p>	
03.27	<p><b>Traffic Management Plan</b></p> <p>Prior to the commencement of construction, the Proponent must prepare a Traffic Management Plan for the project, in consultation with RMS, DI Lands and Broken Hill city Council, and to the satisfaction of the Secretary. This plan must detail the measures that would be implemented to:</p> <p>a) minimise the traffic safety impacts of the projects and disruption to local road users during the construction and decommissioning of the project, including:</p> <ul style="list-style-type: none"> <li>temporary traffic controls, including detours and signage;</li> <li>notifying the local community about project-related traffic impacts;</li> <li>responding to any emergency repair or maintenance requirements;</li> <li>implementing a strategy for minimising the traffic impacts associated with the use of over-dimensional vehicles;</li> </ul> <p>b) ensure the project does not disrupt the use of any travelling stock route on site;</p> <p>c) comply with the traffic-related conditions in this approval; and</p> <p>d) include a drivers code of conduct that addresses:</p> <ul style="list-style-type: none"> <li>travelling speed;</li> <li>procedures to ensure that drivers implement safe driving practices, particularly if using roads through Broken Hill or Silverton; and</li> <li>monitor and report on the effectiveness of these measures and the code of conduct.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Traffic Management Plan.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Traffic Management Plan (Construction), 10 August 2017</li> <li>Traffic Management Plan (Operational), 4 June 2021</li> <li>Letter from RMS to AGL (24 August 2017) confirming acceptance of the construction Traffic Management Plan</li> <li>Letter from RMS to AGL (9 October 2017) confirming acceptance of all preconstruction documentation.</li> </ul> <p><b>Finding:</b> The 2018 IEA noted that DPIE approved the construction Traffic Management Plan on 5 May 2017 subject to the conditions detailed in the above response to condition 03.24. Similar to the Road Upgrade and Maintenance Strategy, the 2018 IEA determined that this condition was 'not verified' as it was unclear whether the DPIE approval conditions were addressed.</p> <p>Further review was undertaken as part of the 2021 IEA, including interviews with the AGL Project Director – Silverton Wind Farm, Major Projects. The review determined that the construction Traffic Management Plan was prepared in accordance with the requirements of this condition and satisfies the DPIE conditions of approval. It is noted that following the receipt of the DPIE conditional approval, additional consultation was undertaken with RMS (now Transport for NSW). In response, the construction Traffic Management Plan was revised on 6 June, 16 June, 30 June and 7 August 2017 and conditionally accepted by</p>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		RMS on 24 August 2017. Subsequent correspondence from the RMS on 9 October 2017 confirmed acceptance of all preconstruction documentation, including the construction Traffic Management Plan.	
	<b>AVIATION</b>		
03.28	<b>Notification of Aviation Authorities</b> Prior to the construction of any wind turbine or wind monitoring mast, the Proponent must provide the following information to CASA, Airservices Australia, Broken Hill City Council and the RAAF (together the authorities): a) coordinates in latitude and longitude of each wind turbine and mast; b) final height of each wind turbine and mast in Australian Height Datum; and c) ground level at the base of each wind turbine and mast in Australian Height Datum.	<b>Evidence</b> <ul style="list-style-type: none"> <li>2018 IEA.</li> </ul> <b>Finding:</b> The requirements of this condition were assessed as compliant in the 2018 IEA. As such, the condition is considered to be closed.	Not Triggered
03.29	Within 30 days of the practical completion of any turbine or mast, the Proponent must: a) provide confirmation to the authorities that the information that was previously provided remains accurate; or b) update the information previously provided.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email from AGL to the auditor (7 June 2020) confirming that Facility Practical Completion is scheduled to occur on 30 June 2021.</li> </ul> <b>Finding:</b> Facility Practical Completion occurred on 30 June 2021 and as such, the requirements of this condition were not triggered.	Not Triggered
	<b>RADIOCOMMUNICATIONS</b>		
03.30	Prior to the commencement of construction, the Proponent must undertake a baseline assessment of radio communication services to assess the pre-existing signal strength at any residence within 5 kilometres of the site, in consultation with registered communications licence holders (including emergency services).  If this assessment identifies the potential for interference as a result of the project, the Proponent must identify and implement reasonable and feasible mitigation measures to address any potential disruption in consultation with the landowner (where applicable). These measures must be implemented within 3 months of the completion of the baseline assessment, or as otherwise agreed by the Secretary.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Silverton Wind Farm Baseline Assessment of Broadcasting and Radiocommunication Services, Lawrence Derrick &amp; Associates (20 November 2017)</li> <li>Email from Lawrence Derrick &amp; Associates (10 June 2021) confirming that the RFS site (ID 11444 to ID 34929) is no longer licenced</li> <li>Impact Assessment of Silverton Wind Farm on Government Owned Radio Networks, Telco Authority (29 August 2016)</li> <li>Final Layout Plan (Rev X1), including the micro sitting distance from the Approved Project coordinates (maximum 87.3m), ecological constraints and heritage items.</li> </ul> <b>Finding:</b> The <i>Impact Assessment of the Silverton Wind Farm on Government Owned Radio Networks</i> (Telco Authority) determined that	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p><i>"the development of the wind farm poses no threat to any government agency owned point to point link."</i> The report references engagement undertaken between the Project Proponent and the RFS (the only registered communications licence holder) in August 2016.</p> <p>The findings of the Telco Authority report were supplemented by a baseline assessment of radio communication services prepared by Lawrence Derrick &amp; Associates prior to commencement of construction (20 November 2017). The assessment identified one radio site where repositioning may be required if micro sitting of T38 was not feasible. The Final Layout Plan (Rev X1) confirms that micro-sitting of T38 was undertaken (29m). On this basis, the potential for interference was effectively mitigated and the condition is assessed as closed.</p>	
03.31	If the project disrupts any radiocommunications services in the area, then the Proponent must make good any disruption to these services as soon as possible following the disruption of the services, but no later than 1 month following the disruption, unless the relevant service providers or user or Secretary agrees otherwise. If there is a dispute about the mitigation measures to be implemented or the implementation of these mitigation measures, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on such a referral will be final and binding on all parties.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Baseline Assessment of Broadcasting and Radiocommunication Services, Lawrence Derrick &amp; Associates (20 November 2017)</li> <li>Letter from AGL to DPIE (4 June 2021) advising that full generation was achieved on 21 May 2020 and operations formally commenced on 16 December 2020</li> <li>Silverton Wind Farm Complaints Register.</li> </ul> <p><b>Finding:</b> Full generation of the wind farm was achieved on 21 May 2018 and operations formally commenced on 16 December 2020. AGL advised that there have been no complaints received to date in relation to the disruption of radiocommunications services in the area. As such, the condition was not triggered during the audit period.</p>	Not Triggered
	<b>BUSHFIRE</b>		
03.32	<p>The Proponent must:</p> <p>a) ensure that the project:</p> <ul style="list-style-type: none"> <li>provides for asset protection in accordance with the RFS's Planning for Bushfire Protection 2006 (or its latest version);</li> <li>is suitably equipped to respond to any fires on site;</li> </ul> <p>b) develop procedures to manage potential fires on site, in consultation with the RFS; and</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Fire Management Plan, Biosis (29 April 2021)</li> <li>Letter from DPIE to AGL (10 May 2021) confirming that the Fire Management Plan supports the Biodiversity Management Plan (condition 03.18(c)) as well as the bushfire management requirements of condition 03.32</li> <li>Silverton Wind Farm GE EHS Induction Training 2021</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site.	<ul style="list-style-type: none"> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The Fire Management Plan has been prepared in accordance with the RFS Planning for Bushfire Protection and the requirements of this condition. During the inspection, it was noted that the site is suitably equipped to respond to fire, including fire extinguishers in vehicles and towers.</p>	
	<b>SAFETY</b>		
03.33	<p>The Proponent must:</p> <p>a) prepare a Safety Management System for the project in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management' prior to commissioning any wind turbines on site; and</p> <p>b) implement, and if necessary update, the system over the remaining life of the project.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Simplified Work Plan (SWP), Silverton Wind Farm - STWF EHS-Ren-P&amp;S-E1.4_SWP-STWF (31 January 2020)</li> <li>Sample of EHS Meeting Minutes (10 October 2018 and 17 March 2021)</li> <li>Sample Quarterly EHS Inspection (18 December 2020)</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The Safety Management System, documented in the Simplified Work Plan, adequately addresses the requirements of this condition. Implementation of the Simplified Work Plan was demonstrated through EHS Meeting Minutes, EHS Inspections and the EHS Notice Board (sighted during the site inspection on 10 June 2021).</p> <p>It is noted that the scope of the 2021 IEA did not include an audit of the Safety Management System.</p>	Compliant
	<b>WASTE</b>		
03.34	<p>The Proponent must:</p> <p>a) minimise the waste generated by the project;</p> <p>b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines, 2014 (or its latest version);</p> <p>c) store and handle all waste generated on site in accordance with its classification;</p> <p>d) not receive or dispose of any waste on site; and</p> <p>e) ensure all waste is disposed of at appropriately licenced waste facilities.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Weekly Environmental Inspection Checklist (16 April 2020) including waste management measures</li> <li>Sample of weighbridge dockets for the Broken Hill City Council Landfill Depot and septic tank service reports (Reno Pipe)</li> <li>Site inspection (10 June 2021)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021, including waste minimisation requirements.</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<b>Finding:</b> <ul style="list-style-type: none"> <li>a) The auditor attended the Site Induction and noted the inclusion of waste minimisation guidance</li> <li>b) Waste streams generated by the Project were pre-classified and include general solid waste, septic tank waste and waste oil/oily rags (<b>Appendix C</b>, Photo C1).</li> <li>c) During the site inspection it was noted that waste was appropriately segregated by classification (e.g. general solid waste and waste oil)</li> <li>d) GE advised that there was no waste received at the premises or disposed on site</li> <li>e) GE reported that all waste was disposed to the Broken Hill City Council Landfill Depot (EPL 5898). The auditor reviewed a sample of disposal facility receipts and confirmed that the facility is appropriately licenced to accept the waste streams.</li> </ul>	
	<b>REHABILITATION &amp; DECOMMISSIONING</b>		
03.35	Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Proponent must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 4.	<b>Evidence</b> <ul style="list-style-type: none"> <li>• Interview with AGL Environmental Advisor.</li> </ul> <b>Finding:</b> The requirements of this condition were not triggered; AGL advised that the site was in construction or operation for the duration of the audit period.	Not Triggered

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status																		
	<div><p><b>Table 4: Rehabilitation Objectives</b></p><table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site (as a whole)</td><td><ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible</li></ul></td></tr><tr><td>Revegetation</td><td><ul style="list-style-type: none"><li>Restore native vegetation generally as identified in the Biodiversity Management Plan</li></ul></td></tr><tr><td>Above ground wind turbine infrastructure (excluding wind turbine pads)</td><td><ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Secretary agrees otherwise.</li></ul></td></tr><tr><td>Wind turbine pads</td><td><ul style="list-style-type: none"><li>To be covered with soil and/or rock and revegetated</li></ul></td></tr><tr><td>Above ground ancillary infrastructure</td><td><ul style="list-style-type: none"><li>To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</li></ul></td></tr><tr><td>Internal access roads</td><td><ul style="list-style-type: none"><li>To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</li></ul></td></tr><tr><td>Land use</td><td><ul style="list-style-type: none"><li>Restore or maintain land capability as described in the EA</li></ul></td></tr><tr><td>Community</td><td><ul style="list-style-type: none"><li>Ensure public safety</li></ul></td></tr></table></div>	Feature	Objective	Project site (as a whole)	<ul style="list-style-type: none"><li>Safe, stable and non-polluting</li><li>Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible</li></ul>	Revegetation	<ul style="list-style-type: none"><li>Restore native vegetation generally as identified in the Biodiversity Management Plan</li></ul>	Above ground wind turbine infrastructure (excluding wind turbine pads)	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless the Secretary agrees otherwise.</li></ul>	Wind turbine pads	<ul style="list-style-type: none"><li>To be covered with soil and/or rock and revegetated</li></ul>	Above ground ancillary infrastructure	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</li></ul>	Internal access roads	<ul style="list-style-type: none"><li>To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary</li></ul>	Land use	<ul style="list-style-type: none"><li>Restore or maintain land capability as described in the EA</li></ul>	Community	<ul style="list-style-type: none"><li>Ensure public safety</li></ul>		
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03.36	<p><b>Progressive Rehabilitation:</b></p> <p>The Proponent must</p> <p>a) rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;</p> <p>b) minimise the total area exposed at any time; and</p> <p>c) employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion on parts of the site that cannot yet be permanently rehabilitated.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Operational Biodiversity Adaptive Management Plan, Biosis (20 December 2018)</li><li>Vegetation Management Plan, Biosis (20 December 2018)</li><li>DPIE Approval of VMP (requested under another condition)</li><li>Silverton Wind Farm Site Rehabilitation Plan (Appendix 6 of the Vegetation Management Plan), Biosis (20 December 2018)</li><li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021), including an assessment of weeds and areas of disturbance</li><li>Interview with Biosis (8 June 2021).</li></ul> <p><b>Finding (Documentation):</b> The Vegetation Management Plan addresses the requirements of this condition, including site-specific rehabilitation criteria and interim rehabilitation strategies.</p>	<p>Compliant</p> <p><b>2021-OFI-06</b></p>																		

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p><b>Finding (Implementation):</b> During the site inspection on 10 June 2021, it was noted that rehabilitation works were largely progressed within the context of extended drought conditions (<b>Appendix C</b>, Photo C3). Opportunities for natural regeneration have been pursued where appropriate through scarification of soils to enable water pooling and capture of seed falls. During the audit period, twice-yearly monitoring was undertaken by the Project Ecologist to guide the rehabilitation response.</p> <p><b>2021-OFI-06 (Table 5.3):</b> It was observed during the site inspection that aggregate remained in situ at the former Crusher Pit site and rehabilitation was not significantly progressed (<b>Appendix C</b>, Photos C10). AGL advised that the surplus aggregate has been retained for the planned rectification of the access roads as detailed in the Defects Register. It is recommended that the Defects Register be revised to reflect the staged rehabilitation of the Crusher Pit site.</p>	
03.37	<p><b>Dismantling of Wind Turbines</b></p> <p>Any individual wind turbines which cease operating for more than 12 consecutive months must be dismantled within 18 months after that 12 month period, unless the Secretary agrees otherwise.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>AGL email correspondence (26 May 2021).</li> </ul> <p><b>Finding:</b> AGL confirmed that there were no turbines which ceased operating for more than 12 consecutive months during the audit period. As such, the requirements of this condition were not triggered.</p>	Not Triggered
	<b>SCHEDULE 4</b>		
	<b>ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING</b>		
	<b>ENVIRONMENTAL MANAGEMENT</b>		
04.01	<p><b>Environmental Management Strategy</b></p> <p>Prior to the commencement of construction, the Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> <li>provide the strategic framework for environmental management of the project;</li> <li>identify the statutory approvals that apply to the project;</li> <li>describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;</li> <li>describe the procedures that would be implemented to:</li> </ol>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Overarching Environmental Management Strategy, AGL (18 April 2018)</li> <li>Silverton Wind Farm Operations Environmental Management Strategy, Ecology and Heritage Partners (21 December 2017)</li> <li>Community Consultative Committee Meeting Agendas, Minutes and Presentations (7 June 2018 to 24 February 2021)</li> <li>AGL Silverton Wind Farm website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm">https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm</a>)</li> <li>Silverton Wind Farm Complaints Register</li> </ul>	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>receive, handle, respond to, and record complaints;</li> <li>resolve any disputes that may arise;</li> <li>respond to any non-compliance;</li> <li>respond to emergencies; and</li> </ul> <p>e) include:</p> <ul style="list-style-type: none"> <li>copies of any strategies, plans and programs approved under the conditions of this approval; and</li> <li>a clear plan depicting all the monitoring to be carried out in relation to the project, including a table summarising all the monitoring and reporting obligations under the conditions of this approval.</li> </ul> <p>Following the Secretary's approval, the Proponent must implement the Environmental Management Strategy.</p>	<ul style="list-style-type: none"> <li>Sample of GE Renewable Energy Monthly Reports (January 2021 and February 2021).</li> </ul> <p><b>Finding (Documentation):</b> The Overarching Environmental Management Strategy provides the framework for environmental management during construction and operation. Specifically, the document references:</p> <ul style="list-style-type: none"> <li>Wind Farm Works Environmental Management Strategy</li> <li>Connection Works Environmental Management Strategy (TransGrid)</li> <li>Operations Environmental Management Strategy.</li> </ul> <p>The 2018 IEA determined that the Wind Farm Works Environmental Management Strategy and the Connection Works EMS were prepared prior to commencement of construction, as required, and approved by DPIE. Given that the Wind Farm Works Environmental Management Strategy and Connection Works Environmental Management Strategy are specific to the construction phase, the documents were not considered within the scope of this audit.</p> <p>The Operations Environmental Management Strategy is focussed on the operational aspects of the development and was approved by DPIE on 21 December 2017. The requirements of this condition are adequately addressed by the Operations Environmental Management Strategy.</p> <p><b>Finding (Implementation):</b> Adequate evidence was provided by AGL to demonstrate implementation of the Operations Environmental Management Strategy, including community engagement, public reporting of performance, and reporting of environmental incidents, complaints and non-compliances.</p>	
04.02	<p><b>Adaptive Management</b></p> <p>The Proponent must assess and manage project-related risks to ensure that there are no exceedances of the criteria and/or performance measures in schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this approval and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li> </ul> <p><b>Finding:</b> Schedule 3 includes criteria for blasting and operational noise. As detailed in the responses to conditions 03.08, 03.09 and 03.12, there was no blasting undertaken during the audit period and operational noise was assessed as compliant against the nominated criteria.</p>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<p>Where an exceedance of these criteria and/or performance measures has occurred, the Proponent must, at the earliest opportunity:</p> <ul style="list-style-type: none"> <li>a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur,</li> <li>b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</li> <li>c) implement remediation measures as directed by the Secretary.</li> </ul>		
04.03	<p><b>Revision of Strategies, Plans and Programs</b></p> <p>Within 3 months of the submission of:</p> <ul style="list-style-type: none"> <li>a) an incident report under condition 5 below;</li> <li>b) an audit report under condition 7 below; or</li> <li>c) any modification to the conditions of this approval (unless the conditions require otherwise),</li> </ul> <p>the Proponent must review and, if necessary, revise the strategies, plans and programs required under this approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the project.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Email from AGL to DPIE (8 August 2018) requesting an extension of the time for submission of the 2018 IEA (from 11 August to 28 August 2018)</li> <li>• Email from DPIE to AGL (9 August 2018) approving the requested extension of time for submission of the 2018 IEA</li> <li>• Operations Environmental Management Strategy (December 2017)</li> <li>• Road Upgrade and Maintenance Strategy (7 August 2017)</li> <li>• Traffic Management Plan (Construction) (7 August 2017).</li> </ul> <p><b>Finding:</b></p> <p><b>2021-NC-01 (Table 5.1):</b> Insufficient evidence was provided to demonstrate that all strategies, plans and programs were reviewed within three months of submission of the 2018 IEA. Specifically, there was no evidence that the Operations Environmental Management Strategy and the construction Traffic Management Plan were reviewed between 28 August 2018 and 28 November 2018.</p> <p>It is recommended that strategies, plans and programs required under this approval be reviewed within three months of the submission of the 2021 IEA. Where one or more documents require revision, the approval process detailed in this condition must be implemented..</p>	<p>Non-Compliant</p> <p><b>2021-NC-01</b></p>
04.04	<p><b>Community Consultative Committee</b></p> <p>From the commencement of construction, the Proponent must operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary, in accordance with the Community Consultative Committee Guidelines for State Significant Projects (2016) or its latest version.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Community Consultation Committee meeting agendas, presentations and minutes (June 2018 to February 2021).</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<b>Finding:</b> Adequate evidence was sighted to demonstrate that the Community Consultative Committee was operated by AGL during the audit period in accordance with the requirements of this condition.	
	<b>REPORTING</b>		
04.05	<b>Incident Reporting</b> The Proponent shall immediately notify the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the project, the Proponent shall notify the Secretary and any other relevant agencies as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of the date of the incident, the Proponent shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Environmental Incident Register ('GE-STWF Environmental Incident Register').</li> </ul> <b>Finding:</b> During the audit period, there were no environmental incidents reported by GE which caused, or threatened to cause, material harm to the environment. As such, the requirements of this condition were not triggered.	Not Triggered
04.06	<b>Regular Reporting</b> The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Environmental Performance Reporting Summary (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm">https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm</a>). Monthly reporting commenced in April 2020.</li> <li>Bird and Bat Monitoring 2018 – 2020, Biosis (24 February 2021)</li> <li>Vegetation Monitoring Report – 2018, Biosis (29 June 2020)</li> <li>Vegetation Monitoring Report – 2019, Biosis (30 June 2020).</li> </ul> <b>Finding:</b> Environmental performance reporting requirements are captured in nominated plans as follows: <ul style="list-style-type: none"> <li>Overarching Environmental Management Strategy – Reporting requirements (section 3.1.3) are focussed on the construction phase of works.</li> <li>Operational Biodiversity Adaptive Management Plan – Following the collection of baseline data in spring 2018, annual monitoring is to be undertaken for three years (section 1.4). An annual report on the implementation of management measures is to be submitted to DPIE and the EPA (section 4).</li> <li>Goat Management Plan – Annual reporting in accordance with the Operational Biodiversity Adaptive Management Plan (section 4).</li> </ul>	Non-Compliant  <b>2021-NC-02</b>

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<ul style="list-style-type: none"> <li>Vegetation Management Plan – Annual reporting in accordance with the Operational Biodiversity Adaptive Management Plan (section 4.4).</li> <li>Bird and Bat Adaptive Management Plan – Annual Bird and Bat Management Report (section 4.2).</li> </ul> <p><b>2021-NC-02 (Table 5.1):</b> 2021-NC-02: Environmental performance reporting is not consistently undertaken in accordance with relevant plans. Specific findings are summarised as follows:</p> <ul style="list-style-type: none"> <li>The Biodiversity and Adaptive Management Plan includes commitments to prepare and submit an annual report. An annual report has not been prepared to date. Biosis advised that the first report would be prepared in October 2021 which will capture the extended commissioning phase.</li> <li>The Vegetation Monitoring Plan includes commitments to prepare and submit an annual report. Vegetation monitoring was undertaken in 2018 and 2019, however the reports were not finalised until June 2020. As such, monitoring reports were not submitted annually to the relevant stakeholders during the audit period. Biosis advised that the 2020 monitoring report was delayed due to COVID-19 travel restrictions between NSW and Victoria.</li> <li>The Bird and Bat Adaptive Management Plan includes commitments to prepare and submit an annual report. A bird and bat monitoring report was prepared for the period 2018 to 2020 rather than annually as required by the Bird and Bat Adaptive Management Plan.</li> </ul> <p>It is recommended that environmental performance reporting is undertaken in a timely manner and in accordance with the requirements of relevant plans.</p>	
	<b>AUDITING</b>		
04.07	<p>Within 1 year of the commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:</p> <p>a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Professional Services Agreement, Silverton Wind Farm Project 2021 Independent Environmental Audit, Executed 10 May 2021</li> <li>Letter from DPIE to AGL (31 March 2021) endorsing the appointment of Ms Corish to conduct the 2021 IEA.</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	b) include consultation with the relevant agencies; c) assess the environmental performance of the project and assess whether it is complying with the requirements in this approval and any relevant EPL/s; d) review the adequacy of any approved strategy, plan or program required under the abovementioned approvals; and e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy, plan or program required under these approvals.  Note: This audit team must be led by a suitably qualified auditor and/or experts in any other fields specified by the Secretary.	<b>Finding:</b> The 2018 IEA was commissioned on 11 May 2018 and the 2021 IEA was commissioned on 10 May 2021. The scope of the 2021 IEA satisfies the requirements of this condition.	
04.08	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email from AGL to DPIE (8 August 2018) requesting an extension of time for submission of the 2018 IEA (from 11 August to 28 August 2018)</li> <li>Email from DPIE to AGL (9 August 2018) approving the requested extension of time for submission of the 2018 IEA</li> <li>Email from AGL to DPIE (28 August 2018) enclosing the 2018 IEA and the Action Response Plan.</li> </ul> <b>Finding:</b> Adequate evidence was provided by AGL to demonstrate compliance with the requirements of this condition.	Compliant
	<b>ACCESS TO INFORMATION</b>		
04.09	The Proponent must: a) make the following information publicly available on its website as relevant to the stage of the project: <ul style="list-style-type: none"> <li>the EA;</li> <li>the final layout plans for the project;</li> <li>current statutory approvals for the project;</li> <li>approved strategies, plans or programs required under the conditions of this approval;</li> <li>the proposed staging plans for the project if the construction, operation and/or decommissioning of the project is to be staged;</li> </ul>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Silverton Wind Farm Project Website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm">https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm</a>).</li> </ul> <b>Finding:</b> The Silverton Wind Farm Project Website adequately addresses the requirements of this condition.	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
	<ul style="list-style-type: none"> <li>a comprehensive summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</li> <li>a complaints register, which is to be updated on a monthly basis;</li> <li>minutes of CCC meetings;</li> <li>the annual Statement of Compliance with the EPL;</li> <li>any independent environmental audit, and the Proponent's response to the recommendations in any audit; and</li> <li>any other matter required by the Secretary; and</li> </ul> <p>b) keep this information up to date, to the satisfaction of the Secretary.</p>		
	<b>APPENDIX 3</b>		
	<b>COMMUNITY ENHANCEMENT COMMITMENTS</b>		
	The Proponent commits to the following community enhancement initiatives:		
	<b>Silverton Community Fund</b>		
A3.01	The Proponent will establish a Silverton Community Fund of \$15,000 per annum, with the objective to broaden the environmental and community benefits of the wind farm within the local Silverton Community (i.e. within 10 km of the project).	<b>Evidence</b> <ul style="list-style-type: none"> <li>Silverton Wind Farm Community Enhancement Program, AGL (November 2017)</li> <li>Community Consultative Committee presentation (22 March 2018) detailing the Silverton Community Fund advertisement and application process</li> <li>Community Consultative Committee presentation (19 September 2019), confirming a grant of \$20,000 to the Penrose Park Trust (tennis court improvements)</li> <li>Community Consultative Committee meeting minutes (24 February 2021) confirming support to the Silverton Gaol Museum Renovations and Silverton War Memorial Youth Camp</li> <li>Tax Invoice from Bromson Energy (26 June 2020) and AGL Payment Claim Assessment for the supply and installation of solar power system at the Silverton War Memorial Youth Camp (\$5,885)</li> <li>Tax Invoice from the Broken Hill Historical Society (26 June 2020) and AGL Payment Claim Assessment for repairs and refurbishment of the Silverton Gaol Museum Renovations (\$9,115)</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<ul style="list-style-type: none"> <li>Community Consultative Committee meeting minutes, 24 February 2021 confirming that the Silverton Community Fund will support the Silverton Village Committee for a 6KW rooftop solar installation and the Broken Hill Historical Society for an upgrade of facilities.</li> </ul> <p><b>Finding:</b> Adequate evidence was provided to demonstrate annual implementation of the Community Enhancement Program in 2019, 2020 and 2021. It is noted that the 2018 initiative was verified as part of the 2018 IEA (\$27,726 for the renovation of the renovation of the Silverton Municipal Chambers).</p>	
A3.02	<p>The Proponent will establish a structure for the administration of the Community Fund in consultation with the local community, in particular the Silverton Village Committee, CCC and Council. This will include:</p> <ul style="list-style-type: none"> <li>development of guidelines and eligibility criteria for applicants wishing to apply for funding;</li> <li>establishment of an independent panel made up of representatives of the Silverton local community, Silverton Village Committee, the CCC and the Proponent (if required); and</li> <li>development of assessment criteria to be used by the panel to assess applications.</li> </ul>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Community Enhancement Program, AGL (November 2017)</li> <li>AGL's Local Community Investment Program (Silverton Community</li> <li>Application Form template.</li> </ul> <p><b>Finding:</b> The structure for the administration of the Community Fund was established during construction and assessed as adequate in the 2018 IEA. As detailed in Appendix 3, Condition 1 (Silverton Community Fund), sufficient evidence was provided to demonstrate that the Community Fund was effectively implemented during the audit period and in accordance with the structure detailed in the above documents.</p>	Compliant
	<b>Solar Silverton Program</b>		
A3.03	<p>The Proponent will offer solar power systems (sometimes call PV or photovoltaic – 5kW) for residences within 10 km of the project.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Community Enhancement Program, AGL (November 2017)</li> <li>Community Consultative Committee Minutes (30 August 2018) including a status update on the Solar Silverton Program</li> <li>Community Consultative Committee meeting minutes (24 February 2021) confirming that several residences were undergoing renovations and as such solar panels were provided, but not installed</li> <li>AGL spreadsheet, 'Silverton.Solar.Summary 02.02.20' providing details of 35 eligible residences, of which solar power systems were</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<p>installed at 27 residences and solar panels were provided to a further five residences. The remaining properties were uninhabited or offered an alternative to solar panels.</p> <p><b>Finding:</b> The 2018 IEA determined that as of 28 June 2018, 16 solar power systems were installed in residential properties. During the current audit period, 11 additional solar power systems were installed and solar panels were provided to five residences. AGL have provided adequate evidence to demonstrate that the Solar Silverton Program has been implemented in accordance with the requirements of this condition. As such, the condition is assessed as closed.</p>	
A3.04	The Solar Silverton Program will commence at the start of construction and be completed within two years of completion of construction.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>AGL spreadsheet, 'Silverton.Solar.Summary 02.02.20' providing details of 35 eligible residences and the dates on which solar power systems were installed or solar panels were provided to residences</li> <li>Email from AGL to the auditor (7 June 2020) confirming that Facility Practical Completion is scheduled to occur on 30 June 2021.</li> </ul> <p><b>Finding:</b> The Solar Silverton Program commenced on 5 June 2018 and was completed on 18 February 2019. Facility Practical Completion is scheduled to occur on 30 June 2021 and as such, the requirements of this condition have been satisfied and assessed as closed.</p>	Compliant
A3.05	Due to the heritage qualities of Silverton, not all residences may be suitable for installation of solar equipment, and the Proponent will ensure heritage issues are taken into account.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Community Enhancement Program, AGL (November 2017)</li> <li>Email correspondence from the AGL Community Manager (24 May 2021) detailing the outcomes of the Solar Silverton Program.</li> </ul> <p><b>Finding:</b> The Silverton Wind Farm Community Enhancement Program notes that 5kW solar systems are not always feasible due to the structural integrity of the roof, the presence of hazardous materials and the electrical condition of the property. It was reported by AGL that where solar panels were not feasible, alternatives were identified in consultation with property owners including improvements to rooftops and the</p>	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		construction of dedicated structures to mount the panels. As such, the condition is assessed as closed.	
	<b>Water Tank Program</b>		
A3.06	The Proponent will provide (on request) a domestic sized water tank to all inhabited residences within 10 km of the project.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Community Consultation Committee presentation (24 February 2021) noting that domestic sized water tanks have been installed in all inhabited residences</li> <li>AGL spreadsheet, "Water_Tank_Tracking_24052021" detailing the 30 residents who requested and received a water tank</li> <li>Tax Invoices from Broken Hill Plumbing Services (dated 8 October 2018 to 18 August 2019) for the installation of water tanks at 30 residential properties.</li> </ul> <p><b>Finding:</b> The Community Consultative Committee was advised on 24 February 2021 that domestic sized water tanks had been installed in all inhabited residences. Adequate evidence was provided by AGL to demonstrate completion of the water tank program. As such, this condition is assessed as compliant and closed.</p>	Compliant
	<b>Mobile Reception Program</b>		
A3.07	The Proponent will undertake a feasibility study during the construction phase of the project for improving mobile reception for the Silverton community.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>2018 IEA.</li> </ul> <p><b>Finding:</b> The 2018 IEA determined that the initial feasibility study was completed by AGL during the construction phase. The study determined that the installation of a 20 metre monopole at the Telstra Silverton Exchange site would offer some mobile reception improvement across the local area. As such, this condition is assessed as compliant and closed.</p>	Not Triggered
A3.08	The Proponent will contribute up to \$50,000 for mobile reception improvement works or allow this \$50,000 (or the balance of funds) to be put towards other community improvement projects as agreed with the Silverton Village Committee.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Community Consultation Committee presentation (24 February 2021) noting a contribution of \$50,000 to Telstra for mobile reception improvement works</li> <li>Telstra invoice dated 24 April 2020 for \$50,000 for the Mobile Blackspot Program</li> </ul>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Status
		<ul style="list-style-type: none"> <li>AGL Payment Claim Assessment confirming approval of the Telstra invoice for payment.</li> </ul> <p><b>Finding:</b> Adequate evidence was provided by AGL to demonstrate that \$50,000 was contributed for mobile reception improvement works. As such, the requirements of this condition are closed.</p>	

## B2. Environment Protection Licence – 20882

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding						
1	ADMINISTRATIVE								
A1	What the licence authorises and regulates								
A1.1	<p>This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2:</p> <p>Construction and commission and operation of 58 wind turbines and associated infrastructure for electricity generation.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Email correspondence from AGL to DPIE dated 18 November 2019 which included the Final Layout Plan (Rev X1)</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding:</b> Adequate evidence was provided to demonstrate compliance with the requirements of this condition.</p>	Compliant						
A1.2	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.</p> <p>Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Electricity generation</td><td>Electricity works (wind farms)</td><td>&gt; 1000 - 4000 GWh annual generating capacity</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Electricity generation	Electricity works (wind farms)	> 1000 - 4000 GWh annual generating capacity	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Community Consultative Committee presentation (24 February 2021) noting Annual Energy Production of 780,000 MWh</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding:</b> Adequate evidence was provided to demonstrate compliance with the requirements of this condition.</p>	Compliant
Scheduled Activity	Fee Based Activity	Scale							
Electricity generation	Electricity works (wind farms)	> 1000 - 4000 GWh annual generating capacity							
A2	Premises or plant to which this licence applies								
A2.1	The licence applies to the following premises:	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Email correspondence from AGL to DPIE dated 18 November 2019 which included the Final Layout Plan (Rev X1)</li><li>Site inspection (10 June 2021).</li></ul> <p><b>Finding:</b> Adequate evidence was provided to demonstrate compliance with the requirements of this condition.</p>	Compliant						

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
	<p><b>Premises Details</b></p> <p>SILVERTON WIND FARM</p> <p>BARRIER RANGES</p> <p>SILVERTON</p> <p>NSW 2880</p> <p>LOT 43 DP 760242, LOT 47 DP 760243, LOT 71 DP 760633, LOT 1772 DP 763691, LOT 2523 DP 764486, LOT 2524 DP 764487, LOT 2525 DP 764488, LOT 2526 DP 764489, LOT 5347 DP 768258, LOT 5348 DP 768259, LOT 5364 DP 768275, LOT 5365 DP 768276, LOT 5366 DP 768277, LOT 5373 DP 768284, LOT 5374 DP 768285, LOT 5379 DP 768290, LOT 5380 DP 768291, LOT 5381 DP 768292, LOT 5398 DP 768309, LOT 6481 DP 769310, LOT 6482 DP 769311</p> <p>Note: The premises excludes the construction and operation of:</p> <p>1. The TransGrid 220kV transmission line and associated substation on part Lot 6481 DP 769310 and part Lot 47 DP 760243.</p>		
<b>A3</b>	<b>Information supplied to the EPA</b>		
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to:</p> <p>a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Site Inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The 2018 IEA determined that the Project was generally compliant with the licence application. During the 2021 IEA audit period, there were no additional wind turbine sites constructed and the premise boundary remained unchanged.</p>	Compliant
<b>2</b>	<b>DISCHARGES TO AIR AND WATER AND APPLICATION TO LAND</b>		
<b>P1</b>	<b>Location of monitoring/discharge points and areas</b>		
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>N/A.</li> </ul> <p><b>Finding:</b> The EPL does not identify any utilisation areas.</p>	Not Triggered
<b>3</b>	<b>LIMIT CONDITIONS</b>		
<b>L1</b>	<b>Pollution of waters</b>		

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Environmental Incident Register ('GE-STWF Environmental Incident Register')</li> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> There were three reported environmental incidents during the audit period, all of which were minor in nature and associated with hydraulic oil leaks. The incident response was adequate and there was no reported impact to waters.</p> <p>During the site inspection, permanent drainage structures were largely established and there was no evidence of leaks, spills or discharges.</p>	Compliant
<b>L2</b>	<b>Waste</b>		
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021, including waste management measures.</li> </ul> <p><b>Finding:</b> GE advised that there was no waste received or disposed within the premises. The auditor inspected the premises and determined that there was no evidence of waste generated outside the premises being received for storage, treatment, processing, reprocessing or disposal.</p>	Compliant
L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021, including waste management measures.</li> </ul> <p><b>Finding:</b> During the site inspection, there was no evidence of treatment, processing, reprocessing or disposal of waste. Waste storage was limited to waste generated by the premises.</p>	Compliant
<b>L3</b>	<b>Noise Limits</b>		

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding																																																							
L3.1	<p>The licensee must ensure that the noise generated by the operation of wind turbines does not exceed the noise limits at the residential premises nominated in the table below.</p> <table><tr><th>Location</th><th colspan="10">dBA limit with reference to hub height wind speed</th></tr><tr><th>Metres per second</th><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>9</th><th>10</th><th>11</th><th>12</th><th></th></tr><tr><td>VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>35</td><td>36</td><td>38</td><td></td></tr><tr><td>VL 6</td><td>38</td><td>39</td><td>40</td><td>40</td><td>41</td><td>42</td><td>43</td><td>45</td><td>46</td><td></td></tr><tr><td>All other privately owned non-associated residential premises</td><td colspan="10">The higher of 35dB(A) or the existing background noise level plus 5 dB(A)</td></tr></table> <p>Note: To interpret the locations referenced in the table above see Appendix 2 of the Project Approval MP 08_0022 for the Silverton wind farm kept on EPA file DOC16/602345.</p>	Location	dBA limit with reference to hub height wind speed										Metres per second	4	5	6	7	8	9	10	11	12		VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38		VL 6	38	39	40	40	41	42	43	45	46		All other privately owned non-associated residential premises	The higher of 35dB(A) or the existing background noise level plus 5 dB(A)										<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li></ul> <p><b>Finding:</b> Sonos (November 2020) determined that the operational noise criteria were achieved at the selected non-associated residences. The residents (VL24a and VL6) were selected on the basis that compliance at the respective locations demonstrates compliance of the overall wind farm with SC3CoA8 and SC3CoA9. There were no tones detected at any wind speed or excessive low frequency noise and as such, penalty adjustments were not warranted.</p>	Compliant
Location	dBA limit with reference to hub height wind speed																																																									
Metres per second	4	5	6	7	8	9	10	11	12																																																	
VL - 9, 10, 11, 12, 14, 15, 16, 17a, 17b, 18, 19, 20, 21, 22, 24a, 24b, 25a, 25b, 28a, 28b, 29	35	35	35	35	35	35	35	36	38																																																	
VL 6	38	39	40	40	41	42	43	45	46																																																	
All other privately owned non-associated residential premises	The higher of 35dB(A) or the existing background noise level plus 5 dB(A)																																																									
L3.2	<p>Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the South Australian Environment Protection Authority's South Australian Wind Farms - Environmental Noise Guidelines 2009 (or its latest version). If this guideline is replaced by an equivalent NSW guideline, then the noise generated is to be measured in accordance with the NSW guideline.</p> <p>Note: A 5dB(A) penalty applies separately for tonality and low frequency noise in accordance with the South Australian Wind Farms: Environmental Noise Guidelines 2009 (Modified). Modifications for tonality and low frequency are detailed in Appendix 4 of Project Approval MP 08_0022 kept on EPA file DOC16/602345.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li></ul> <p><b>Finding:</b> Sonos (November 2020) noted that the measurement of noise was undertaken in accordance with the South Australian Environmental Protection Authority’s Wind Farms – Environmental Noise Guidelines 2009 (or its latest version), as modified by the provisions in Appendix 4 of the Project Approval. There were no tones detected at any wind speed or excessive low frequency noise and as such, penalty adjustments were not warranted.</p>	Compliant																																																							
L3.3.	<p>The licensee must ensure that the noise generated by the operation of ancillary infrastructure does not exceed a limit of 35dB(A) LAeq (15 minute) at any non-associated residential premises. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (EPA, 2017).</p> <p>Note: The policy does not apply to construction and blasting activities at the premises.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"><li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li></ul> <p><b>Finding:</b> Sonos (November 2020) determined that the noise from ancillary equipment (substation) was not audible at the selected non-associated residences. The residents (VL24a and VL6) were selected on the basis that compliance at the respective locations demonstrates</p>	Compliant																																																							

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
		compliance of the overall wind farm with SC3CoA8 and SC3CoA9. During the site inspection, the auditor noted that there was no audible noise from ancillary infrastructure at the nearest non-associated residence.	
<b>L4</b>	<b>Blasting</b>		
L4.1	The overpressure level from blasting operations on the premises must not exceed 115dB (Lin Peak) for more than 5% of the total number of blasts over a period of 1 year.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Email correspondence from the Silverton Wind Farm Project Coordinator (24 May 2021) confirming that no blasting was undertaken during the audit period.</li> </ul> <b>Finding:</b> AGL advised that no blasting was undertaken during the audit period. As such, the condition was not triggered.	Not Triggered
L4.2	The overpressure level from blasting operations at the premises must not exceed 120dB (Lin Peak) at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Not Triggered
L4.3	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 5mm per second for more than 5% of the total number of blasts over a period of 1 year.		Not Triggered
L4.4	Ground vibration peak particle velocity from the blasting operations at the premises must not exceed 10mm per second at any time. Error margins associated with any monitoring equipment used to measure this are not to be taken into account in determining whether or not the limit has been exceeded.		Not Triggered
<b>L5</b>	<b>Hours of operation</b>		
L5.1	<p>Standard construction hours</p> <p>Unless otherwise specified by any other condition of this licence, all construction activities are:</p> <p>a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday;</p> <p>b) restricted to between the hours of 8:00am and 1:00pm Saturday; and</p> <p>c) not to be undertaken on Sundays or Public Holidays.</p>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Silverton Wind Farm GE EHS Induction Training 2021</li> <li>Silverton Wind Farm Complaints Register</li> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <b>Finding:</b> Adequate evidence was provided by GE to demonstrate compliance with the requirements of this condition including weekly environmental inspections and the induction training. GE advised that there were no construction or decommissioning activities undertaken outside of standard hours during the audit period. In addition, there were no complaints received during the audit period as relevant to this condition.	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
L5.2	<p>Exemptions to standard construction hours</p> <p>The four categories of works that may be undertaken outside the standard hours of operation permitted by Condition L5.1 are:</p> <ol style="list-style-type: none"> <li>the delivery of oversized plant or structures that police or other authorised authorities determine require special arrangements to transport along public roads;</li> <li>emergency work to avoid the loss of lives or property, or to prevent environmental harm;</li> <li>works that are inaudible at the non-associated residences; or</li> <li>as otherwise approved by the Secretary of the Department of Planning and Environment.</li> </ol> <p>The licensee must notify the EPA within 24 hours of undertaking any works referred to in Condition L5.2.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <p><b>Finding:</b> GE advised that there were no construction or decommissioning activities undertaken outside of standard hours during the audit period. As such, the requirements of this condition were not triggered.</p>	Compliant
<b>L6</b>	<b>Potentially offensive odour</b>		
L6.1	<p>No condition of this licence identifies a potentially offensive odour for the purposes of Section 129 of the Protection of the Environment Operations Act 1997.</p> <p>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> There was no sources of odour identified during the inspection of the premises and no odour complaints received during the audit period.</p>	Compliant
<b>L7</b>	<b>Other limit conditions</b>		
L7.1	<p>The licensee must not construct any turbine greater than 180 metres in height - measured from ground level to the highest blade tip point.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>AGL spreadsheet, 'STWF_Turbine Locations' which includes the coordinates of each turbine, the Australian Height Datum of each structure at ground level and the height of each turbine tip.</li> </ul> <p><b>Finding:</b> On the basis of information provided by AGL, each constructed wind turbine is 175m in height (measured from the above ground level to the blade tip). As such, the wind turbines comply with the requirements of this condition.</p>	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
<b>4</b>	<b>OPERATING CONDITIONS</b>		
<b>O1</b>	<b>Activities must be carried out in a competent manner</b>		
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021).</li> </ul> <b>Finding:</b> The auditor inspected the premises and noted that materials and substances were adequately stored within bunded facilities (Appendix C, Photo C1 and C2). There was no evidence of leaks or spills and all waste was appropriately stored in accordance with the classification.	Compliant
<b>O2</b>	<b>Maintenance of plant and equipment</b>		
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Certificates of Calibration (TEX Onsite) for current clampmeters and graduated wrenches</li> <li>Sample of Maintenance Checklists, GE Energy (16 October 2020, 8 November 2020 and 25 October 2020) noting that the preventative maintenance checklist is completed every 12 months on each wind turbine</li> <li>'GE STWF_Monthly Vehicle Inspections' spreadsheet detailing the outcomes of monthly vehicle inspections.</li> </ul> <b>Finding:</b> Adequate evidence was provided by GE to demonstrate that plant and equipment is operated and maintained in a proper and efficient manner.	Compliant
<b>O3</b>	<b>Dust</b>		
O3.1	Activities occurring in or on the premises must be carried out in a manner that will minimise the generation, or emission from the premises, of wind-blown or traffic generated dust.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Sample of Environmental Inspections (11 May 2018, 16 May 2019, 16 April 2020 and 18 March 2021)</li> <li>Site inspection (10 June 2021)</li> <li>Silverton Wind Farm Complaints Register.</li> </ul> <b>Finding:</b> During the audit period, rehabilitation works were progressively undertaken which reduced the area of surface disturbance. Weekly	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
		<p>environmental inspections undertaken during the audit period included consideration of dust emissions and mitigation measures. It is noted that there were high wind conditions during the site inspection and no evidence of dust emissions.</p> <p>GE advised that there were no dust complaints received during the audit period.</p>	
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Traffic Management Plan (Construction), 10 August 2017</li> <li>• Traffic Management Plan (Operational), 4 June 2021</li> <li>• Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The requirements of this condition are reflected in the construction and operational Traffic Management Plans which are provided to sub-contractors where relevant. There were no trucks on site at the time of the site inspection.</p>	Compliant
<b>O4</b>	<b>Emergency Response</b>		
O4.1	The licensee must have adequate fire prevention measures in place and develop procedures to manage fires which must be documented in the Pollution Incident Response Management Plan prepared for the premises.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Pollution Incident Response Management Plan (11 June 2021)</li> <li>• Fire Management Plan, Biosis (29 April 2021)</li> <li>• Silverton Wind Farm GE EHS Induction Training 2021</li> <li>• Site inspection (10 June 2021).</li> </ul> <p><b>Finding:</b> The requirements of this condition are reflected in the Pollution Incident Response Management Plan and Fire Management Plan. During the inspection, it was noted that the site is suitably equipped to respond to fire, including fire extinguishers in vehicles and towers.</p> <p><b>2021-NC-03 (Table 5.2):</b> The <i>Protection of the Environment Operations (General) Regulation (2009)</i>, Section 98E(2), requires the Pollution Incident Response Management Plan to be tested every 12 months. During the audit period, the Pollution Incident Response Management Plan was tested on 1 June 2021; testing of the plan was not undertaken in 2020 or 2019. It is recommended that testing of the Pollution Incident Response Management Plan is undertaken annually.</p>	<p>Non-Compliant</p> <p><b>2021-NC-03</b></p>

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
<b>O5</b>	<b>Waste Management</b>		
O5.1	The licensee must record the type and volume of all waste generated at the premises and ensure waste is only transported to a premises that can lawfully receive the waste.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Sample of weighbridge dockets for the Broken Hill City Council Landfill Depot and septic tank service reports (Reno Pipe)</li> <li>GE Waste Register.</li> </ul> <p><b>Finding:</b> GE reported that all waste is disposed to the Broken Hill City Council Landfill Depot (EPL 5898). The auditor reviewed the waste register and a sample of disposal facility receipts and confirmed that the facility was appropriately licenced to accept the waste streams.</p>	Compliant
<b>5</b>	<b>MONITORING AND RECORDING CONDITIONS</b>		
<b>M1</b>	<b>Monitoring records</b>		
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020)</li> <li>AGL Silverton Wind Farm website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm">https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm</a>).</li> </ul> <p><b>Finding:</b> Monitoring required to be conducted by this licence is limited to operational noise. Monitoring was conducted by Sonos in November 2020 and the report is publicly available on the Silverton Wind Farm website.</p>	Compliant
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li> </ul> <p><b>Finding:</b> The auditor sighted the noise monitoring reports prepared during the audit period and noted compliance with the requirements of this condition. It is noted that condition M1.2(b) was not triggered during the audit period.</p>	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence:	<b>Evidence</b>	Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
	a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	<ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020).</li> </ul> <p><b>Finding:</b> The auditor sighted the noise monitoring reports prepared during the audit period and noted compliance with the requirements of this condition.</p>	
<b>M2</b>	<b>Recording of pollution complaints</b>		
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm Complaints Register.</li> </ul>	Not Triggered
M2.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	<p><b>Finding:</b> GE has implemented a complaints management process which is compliant with the requirements of this condition. There were no pollution complaints recorded by GE during the audit period.</p>	Not Triggered
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.		Not Triggered
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Not Triggered
<b>M3</b>	<b>Telephone Complaints Line</b>		
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>Silverton Wind Farm project website (<a href="https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm#contact">https://www.agl.com.au/about-agl/how-we-source-energy/silverton-wind-farm#contact</a>)</li> <li>AGL Complaints website (<a href="https://www.agl.com.au/help-support/contact-us/complaints?cidi=A10119">https://www.agl.com.au/help-support/contact-us/complaints?cidi=A10119</a>).</li> </ul>	Compliant
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.		Compliant
M3.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.		Compliant

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
		<b>Finding:</b> The AGL telephone complaints line is available via the Silverton Wind Farm project website and is referenced in the Community Consultative Committee meetings.	
<b>6</b>	<b>REPORTING CONDITIONS</b>		
<b>R1</b>	<b>Annual Return Documents</b>		
R1.1	<p>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</p> <ol style="list-style-type: none"> <li>1. a Statement of Compliance,</li> <li>2. a Monitoring and Complaints Summary,</li> <li>3. a Statement of Compliance - Licence Conditions,</li> <li>4. a Statement of Compliance - Load based Fee,</li> <li>5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,</li> <li>6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and</li> <li>7. a Statement of Compliance - Environmental Management Systems and Practices.</li> </ol> <p>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</p>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Annual Return (11 January 2018 to 10 January 2019)</li> <li>• Annual Return (11 January 2019 to 10 February 2019)</li> <li>• Annual Return (11 February 2019 to 10 January 2020)</li> <li>• Annual Return (11 January 2020 to 10 January 2021).</li> </ul> <p><b>Finding:</b> The Annual Returns prepared during the audit period conform to the requirements of this condition.</p>	Compliant
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.		Compliant
R1.3	<p>Where this licence is transferred from the licensee to a new licensee:</p> <ol style="list-style-type: none"> <li>a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and</li> <li>b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.</li> </ol>	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• Annual Return (11 January 2019 to 10 February 2019)</li> <li>• Annual Return (11 February 2019 to 10 January 2020).</li> </ul> <p><b>Finding:</b> During the audit period, the EPL was transferred from Civil &amp; Allied Technical Construction Pty Ltd to General Electric International Inc. The annual returns were prepared in accordance with the requirements of this condition.</p>	Compliant
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:	<p><b>Evidence</b></p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	Not Triggered

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
	a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	<b>Finding:</b> The requirements of this condition were not triggered during the audit period.	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	<b>Evidence</b> <ul style="list-style-type: none"> <li>Annual Return (11 January 2018 to 10 January 2019)</li> <li>Annual Return (11 January 2019 to 10 February 2019)</li> <li>Annual Return (11 February 2019 to 10 January 2020)</li> <li>Annual Return (11 January 2020 to 10 January 2021).</li> </ul> <b>Finding:</b> The Annual Returns prepared during the audit period conform to the requirements of this condition.	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Annual Return (11 January 2018 to 10 January 2019)</li> <li>Annual Return (11 January 2019 to 10 February 2019)</li> <li>Annual Return (11 February 2019 to 10 January 2020)</li> <li>Annual Return (11 January 2020 to 10 January 2021).</li> </ul> <b>Finding:</b> The Annual Returns are publicly available via the Silverton Wind Farm project website.	Compliant
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Annual Return (11 January 2018 to 10 January 2019)</li> <li>Annual Return (11 January 2019 to 10 February 2019)</li> <li>Annual Return (11 February 2019 to 10 January 2020)</li> <li>Annual Return (11 January 2020 to 10 January 2021).</li> </ul> <b>Finding:</b> The Annual Returns prepared during the audit period conform to the requirements of this condition.	Compliant
<b>R2</b>	<b>Notification of environmental harm</b>		
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul>	Not Triggered

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
		<b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	
<b>R3</b>	<b>Written report</b>		
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	Not Triggered
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	Not Triggered
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; a) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; b) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; c) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; d) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and e) any other relevant matters.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	Not Triggered
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul>	Not Triggered

Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
	licensee must provide such further details to the EPA within the time specified in the request	<b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	
<b>7</b>	<b>GENERAL CONDITIONS</b>		
<b>G1</b>	<b>Copy of licence kept at the premises or plant</b>		
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021).</li> </ul> <b>Finding:</b> A copy of the EPL was sighted by the auditor at the premises during site inspection.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Interview with GE Wind Site Administrative Assistant.</li> </ul> <b>Finding:</b> GE advised that the requirements of this condition were not triggered during the audit period.	Not Triggered
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	<b>Evidence</b> <ul style="list-style-type: none"> <li>Site inspection (10 June 2021).</li> </ul> <b>Finding:</b> A copy of the EPL was sighted by the auditor at the premises during site inspection.	Compliant
<b>8</b>	<b>SPECIAL CONDITIONS</b>		
<b>E1</b>	<b>Post commission noise monitoring</b>		
E1.1	Within 6 months of the commencement of operations the licensee must: <ol style="list-style-type: none"> <li>undertake noise monitoring to determine whether the premises is complying with noise limits at L3.1; and</li> <li>submit a report of the noise monitoring results to the EPA.</li> </ol>	<b>Evidence</b> <ul style="list-style-type: none"> <li>Silverton Wind Farm Noise Compliance Testing, Sonos (November 2020)</li> <li>Email correspondence from AGL to the EPA (11 December 2020), including the Silverton Wind Farm Noise Compliance Testing report.</li> </ul> <b>Finding:</b> Sonos (November 2020) determined that the operational noise criteria were achieved at the selected non-associated residences. The residents (VL24a and VL6) were selected on the basis that compliance at the respective locations demonstrates compliance of the overall wind	Compliant



Ref.	Condition	Evidence Collected, Independent Audit Findings & Recommendations	Finding
		<p>farm with SC3CoA8 and SC3CoA9. There were no tones detected at any wind speed or excessive low frequency noise and as such, penalty adjustments were not warranted.</p> <p>The Sonos (November 2020) report was submitted to the EPA on 11 November 2020.</p>	

## Appendix C Site Photos



Photo C1: Operations and Maintenance Facility – Bunded Waste Oil Storage



Photo C2: Operations and Maintenance Facility – Bunded Chemical Storage



**Photo C3: Former Construction Compound – Rehabilitation Progress**



**Photo C4: Access Road – Road Verge Drainage Controls**





**Photo C5: Aboriginal Site 23-4-0183**



**Photo C6: Porcupine Grass Sparse Woodland – Initial Recovery from Drought Conditions**





Photo C7: Area 7 – Example of a Rock Cross-Bank with Outlet Protection (coir log)



Photo C8: Area 7 – Table Drain





**Photo C9: Area 7 – Example of a Rock Cross-Bank with Outlet Protection (coir log)**



**Photo C10: Crusher Pit Rehabilitation**





**Photo C11: Roadside Erosion (South of Operations and Maintenance Building)**

## **Appendix D Consultation**



**From:** [Sara Regio Candeias](#)  
**To:** [denise.corish](#)  
**Subject:** FW: Silvertown Wind Farm - IEA Audit Team 2021 approval  
**Date:** Tuesday, 27 April 2021 4:08:53 PM  
**Attachments:** [image001.png](#)

---

**Sara Regio Candeias**  
Environment Business Partner

**t:** 0475 805 102  
**m:** 02 9921 2231  
**e:** [scandeias@agl.com.au](mailto:scandeias@agl.com.au)



---

**From:** Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>  
**Sent:** Tuesday, 27 April 2021 2:30 PM  
**To:** Sara Regio Candeias <SCandeia@agl.com.au>  
**Subject:** RE: Silvertown Wind Farm - IEA Audit Team 2021 approval

Good afternoon Sara,

- 1: Yes you can send through the formal letter once you have engaged Ms Corish for the Departments records.
- 2: The Department would suggest consultation with other agencies such as EPA, TfNSW, Biodiversity Conservation Division (previously OEH) and Broken Hill Council.

Regards  
Katrina

**Katrina O'Reilly**  
**Team Leader Compliance**

Energy, Industry & Compliance | Planning and Assessment

T 02 6229 7909 | M 0429 400261 | E [katrina.oreilly@planning.nsw.gov.au](mailto:katrina.oreilly@planning.nsw.gov.au)

PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620

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Environment

*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically*

---

**From:** Sara Regio Candeias [<mailto:SCandeia@agl.com.au>]

**Sent:** Thursday, 22 April 2021 8:27 AM

**To:** Katrina O'Reilly <[Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au)>

**Subject:** FW: Silverton Wind Farm - IEA Audit Team 2021 approval

Dear Katrina,

Good morning.

I'm writing to ask for your assistance in clarifying a couple of matters:

1. Would you like me to email you or submit a formal letter (via Portal) once AGL formally engages Denise Corish (Treo Environment) to conduct the Silverton Wind Farm IEA?
2. Re: IEA scope development - IAPAR guidelines (2020), section 3.2 - would you be able to provide some direction if the department would request other agencies or parties to be consulted for this audit (besides the Silverton Community Consultative Committee)?

Your thoughts would be greatly appreciated.

Best Regards,

Sara

**Sara Regio Candeias**

**Environment Business Partner**

t: 0475 805 102

m: 02 9921 2231

e: [scandeias@agl.com.au](mailto:scandeias@agl.com.au)





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**From:** [no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au) <[no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au)>  
**Sent:** Wednesday, 31 March 2021 2:29 PM  
**To:** Sara Regio Candeias <[SCandeia@agl.com.au](mailto:SCandeia@agl.com.au)>  
**Cc:** Simon Philippides <[SPhilippides@agl.com.au](mailto:SPhilippides@agl.com.au)>  
**Subject:** Silverton Wind Farm - IEA Audit Team 2021 approval

Dear Sara ,

The Department has completed its assessment of the IEA Audit Team 2021 approval for the Silverton Wind Farm

The Department's comments are attached.

If you have any enquiries, please contact Katrina O'Reilly on 0429400261 at [Katrina.OReilly@planning.nsw.gov.au](mailto:Katrina.OReilly@planning.nsw.gov.au).

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning, Industry and Environment



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**From:** [Katrina O'Reilly](#)  
**To:** [Denise Corish](#)  
**Cc:** [Sara Regio Candeias](#)  
**Subject:** Re: Silvertown Wind Farm 2018-2021 Independent Environmental Audit  
**Date:** Thursday, 13 May 2021 1:31:43 PM

---

Thank you Denise.

Areas the Department would like looked at include:

Noise mgt and monitoring;

Rehab of the site;

Erosion and sediment controls;

Vegetation and fauna mgt and monitoring including threatened species;

Bird and Bat mgt and monitoring;

Adaptive mgt;

Traffic movements/mgt;

Community engagement; and

Complaint register and mgt of.

Regards

Katrina

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---

**From:** Denise Corish <denise.corish@treoenvironment.com>  
**Sent:** Wednesday, May 12, 2021 8:26:37 PM  
**To:** Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>  
**Cc:** Sara Regio Candeias <SCandeia@agl.com.au>  
**Subject:** Silvertown Wind Farm 2018-2021 Independent Environmental Audit

Dear Ms O'Reilly,

I refer to the attached correspondence from the Department of Planning, Industry and Environment (the Department) granting approval for Denise Corish of Treo Environment to conduct the Independent Environmental Audit of the Silvertown Wind Farm (2018-2021).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from the Department on the scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To enable timely completion of the audit and demonstrate compliance with the audit period defined in the Project Approval, your feedback (should you have any) is requested by **20 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish

**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552

78 Denison Street

Bondi Junction NSW 2022

[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)

[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** [Darren Wallett](#)  
**To:** [Denise Corish](#)  
**Cc:** [Sara Regio Candeias](#)  
**Subject:** RE: Silvertown Wind Farm 2018-2021 Independent Environmental Audit  
**Date:** Tuesday, 25 May 2021 5:36:13 AM  
**Attachments:** [image005.png](#)  
[image008.png](#)  
[image011.png](#)  
[image001.jpg](#)  
[image002.jpg](#)

---

Hi Denise,

We have nothing additional to add to the audit list identified below.

Regards Darren

**Darren Wallett**  
Unit Head  
Regulatory Operations  
NSW Environment Protection Authority  
D: 02 69 834 930 M: 0427 255 214

NSW EPA logo



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Report pollution and environmental  
incidents 131 555 or +61 2 9995 5555

---

**From:** Denise Corish <denise.corish@treoenvironment.com>  
**Sent:** Thursday, 20 May 2021 7:21 PM  
**To:** EPA RSD Riverina Far West Region Mailbox <riverina.farwest@epa.nsw.gov.au>  
**Cc:** Darren Wallett <Darren.Wallett@epa.nsw.gov.au>; Sara Regio Candeias <SCandeia@agl.com.au>  
**Subject:** Re: Silvertown Wind Farm 2018-2021 Independent Environmental Audit

Dear Sir or Madam,

A follow-up email to request feedback from the EPA on the scope of the Independent Environmental Audit of the Silvertown Wind Farm. As detailed in the attached letter, the scope of the audit includes:

- An assessment of compliance against:
  - Relevant conditions of Project Approval 08\_0022
  - Environmental Management Plans and Sub-plans and other relevant post approval documents
  - Environment Protection Licence 20882
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance
- An assessment of the implementation of previous audit findings, recommendations and actions
- An evaluation of compliance against Environmental Management Plans and Sub-plans and the adequacy of the system to achieve legislative requirements and drive performance

improvements.

If you feel that there are any additional and/or specific matters to be considered, do let me know at the earliest.

I look forward to your response.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** Denise Corish <[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)>  
**Date:** Thursday, 13 May 2021 at 7:16 pm  
**To:** "[riverina.farwest@epa.nsw.gov.au](mailto:riverina.farwest@epa.nsw.gov.au)" <[riverina.farwest@epa.nsw.gov.au](mailto:riverina.farwest@epa.nsw.gov.au)>  
**Cc:** Sara Regio Candeias <[SCandeia@agl.com.au](mailto:SCandeia@agl.com.au)>  
**Subject:** Silverton Wind Farm 2018-2021 Independent Environmental Audit

Dear Sir or Madam,

I refer to the attached correspondence from the Department of Planning, Industry and Environment (the Department) granting approval for Denise Corish of Treo Environment to conduct the Independent Environmental Audit of the Silverton Wind Farm (2018-2021).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from the EPA on the scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To enable timely completion of the audit and demonstrate compliance with the audit period defined in the Project Approval, your feedback (should you have any) is requested by **20 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** [Tom Carruthers](#)  
**To:** [Denise Corish](#)  
**Cc:** [Sara Regio Candeias](#)  
**Subject:** RE: Silvertown Wind Farm 2018-2021 Independent Environmental Audit  
**Date:** Friday, 21 May 2021 9:00:30 AM  
**Attachments:** [image003.jpg](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.png](#)  
[FW Silvertown Wind Farm 2018-2021 Independent Environmental Audit.mso](#)

Hi Denise,

I have circulated the request with other members of Transport who were involved in the Works Authorisation Deed.

Based on correspondence (attached), Transport for NSW have no further additions to the outlined scope of the audit.

Kind Regards,

Thomas Carruthers  
District Works Manager  
Regional Maintenance Delivery  
Regional and Outer Metropolitan  
**Transport for NSW**

T 02 6841 4778 | M 0437 631 078  
Ground Level, 115 Bagot Street, Broken Hill NSW 2880



---

**From:** Denise Corish [mailto:denise.corish@treoenvironment.com]  
**Sent:** Thursday, 20 May 2021 6:50 PM  
**To:** Tom Carruthers <Tom.CARRUTHERS@transport.nsw.gov.au>  
**Cc:** Sara Regio Candeias <SCandeia@agl.com.au>  
**Subject:** Re: Silvertown Wind Farm 2018-2021 Independent Environmental Audit

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Hi Tom,

So sorry to chase – did you happen to have a chance to review the email below? We have a limited timeframe to complete the Independent Environmental Audit of the Silvertown Wind Farm and I am hoping to complete stakeholder consultation this week.

As detailed in the attached letter, the scope of the audit includes:

- An assessment of compliance against:
  - Relevant conditions of Project Approval 08\_0022
  - Environmental Management Plans and Sub-plans and other relevant post approval documents
  - Environment Protection Licence 20882
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance
- An assessment of the implementation of previous audit findings, recommendations and actions
- An evaluation of compliance against Environmental Management Plans and Sub-plans and the adequacy of the system to achieve legislative requirements and drive performance improvements.

If you feel that there are any additional and/or specific matters to be considered, do let me know at the earliest.

I look forward to your response.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** Denise Corish <[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)>

**Date:** Thursday, 13 May 2021 at 7:15 pm

**To:** "tom.carruthers@transport.nsw.gov.au" <tom.carruthers@transport.nsw.gov.au>

**Cc:** Sara Regio Candeias <SCandeia@agl.com.au>

**Subject:** Silverton Wind Farm 2018-2021 Independent Environmental Audit

Hi Tom,

Thanks for your time earlier today. As discussed, Treo Environment has been approved by the Department of Planning, Industry and Environment to conduct the Independent Environmental Audit of the Silverton Wind Farm (2018-2021).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from Transport for NSW on the scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To enable timely completion of the audit and demonstrate compliance with the audit period defined in the Project Approval, your feedback (should you have any) is requested by **20 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish

**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552

78 Denison Street

Bondi Junction NSW 2022

[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)

[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** [ROG South West Region Mailbox](#)  
**To:** [Denise Corish](#)  
**Cc:** [Miranda Kerr](#); [Simon Stirrat](#)  
**Subject:** BCD Response RE: Silverton Wind Farm 2018-2021 Independent Environmental Audit  
**Date:** Thursday, 20 May 2021 8:35:39 AM  
**Attachments:** [image001.jpg](#)  
[DOC21-387298 BCD Response - Silverton Wind Farm Audit.pdf](#)

---

Hi Denise,

Please find attached comments for consideration in the Independent Environmental Audit of the Silverton Wind Farm (2018-2021).

The short timeframe for this request has restricted our feedback.

If you have any questions please contact Miranda Kerr, Senior Biodiversity Conservation Officer on 02 6022 0607 or via [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au).

Regards

**Andrew Fisher**  
**Senior Team Leader, Planning – South West**

Biodiversity and Conservation | Department of Planning, Industry and Environment  
**T** 02 6022 0623 | **M** 0427 562 844 | **E** [andrew.fisher@environment.nsw.gov.au](mailto:andrew.fisher@environment.nsw.gov.au)  
PO Box 1040, 512 Dean St, Albury, NSW 2640  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)

Contact the South West Planning Team about biodiversity planning matters by emailing [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au).



*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

---

**From:** Denise Corish <[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)>  
**Sent:** Wednesday, 12 May 2021 8:23 PM  
**To:** Andrew Fisher <[Andrew.Fisher@environment.nsw.gov.au](mailto:Andrew.Fisher@environment.nsw.gov.au)>  
**Subject:** Silverton Wind Farm 2018-2021 Independent Environmental Audit

Dear Mr Fisher,

I refer to the attached correspondence from the Department of Planning, Industry and Environment (the Department) granting approval for Denise Corish of Treo Environment to conduct the Independent Environmental Audit of the Silverton Wind Farm (2018-2021).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from the Biodiversity Conservation Division on the scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To

enable timely completion of the audit and demonstrate compliance with the audit period defined in the Project Approval, your feedback (should you have any) is requested by **20 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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Our ref: DOC21/387298

Senders ref:

Denise Corish  
Lead Auditor  
Treo Environment

Via email: [denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)

20 May 2021

Dear Ms Corish

**Subject: Silvertown Wind Farm 2018–2021 Independent Environmental Audit**

I refer to your letter dated 12 May 2021 about the Silvertown Wind Farm Independent Environmental Audit seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment (the Department).

BCD has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats) and flooding. We offer the following feedback about conditions of development approval associated with the Biodiversity Management Plan and five sub-plans, which were prepared in consultation with BCD.

**Bird and Bat Adaptive Management Plan (BBAMP)**

- We are currently reviewing a revised version of the BBAMP, which requires consultation with other parts of the Department. We are not able to give feedback about the BBAMP until that review is finalised, which is unlikely within the Audit timeframe.
- Note that a complete finalised version of the approved BBAMP was not uploaded to the AGL website. We were notified by Biosis in November 2020 that the publicly available version did not effectively include our final comments, including the requirement for baseline bat survey in March/April. This also impacted the carcass monitoring program however we understand that Skylos Ecology did additional work to complete the dataset. We have been supplied with the first Annual Bird and Bat Monitoring Report but are yet to receive the Year 1 Collision Monitoring Report.

**Porcupine Grass Sparse Woodland Recovery Plan**

- The 2018 Independent Environmental Audit prepared by MCW Environmental reported that permanent drainage controls to manage long-term erosion and sedimentation risks associated with access roads had not been installed. BCD are particularly concerned about unmitigated impacts to the critically endangered Porcupine Grass Sparse Woodland where it occurs downhill and adjacent to construction disturbance.

**Vegetation Management Plan**

- Weed introduction and spread due to development of the wind farm may not have been evident during drought conditions but are likely to proliferate after rainfall events.

**Goat Management Plan**

- Management of goats according to the approved plan is critical to allow vegetation to recover following higher rainfall periods.

BCD understands that there will be a full review of management plans during 2021, three years after the start of construction. We are expecting BCD to be consulted during the review of

biodiversity-related management plans, particularly whether survey results indicate a need for altering survey and monitoring program design. For example, review of the Barrier Range Dragon 2019 and 2020 monitoring reports indicates that more statistical rigour is needed for meaningful results. Confirmation of the need for such a review and anticipated timing would be appreciated.

If you have any questions about this advice, please contact Miranda Kerr, Senior Biodiversity Conservation Officer, via [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au) or 02 6022 0607.

Yours sincerely



Andrew Fisher  
**Senior Team Leader Planning**  
**South West Branch**  
**Biodiversity and Conservation Division**  
**Department of Planning, Industry and Environment**

## Denise Corish

---

**From:** Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>  
**Sent:** Tuesday, 25 May 2021 1:08 PM  
**To:** Denise Corish  
**Cc:** ROG South West Region Mailbox  
**Subject:** RE: BCD Response RE: Silverton Wind Farm 2018-2021 Independent Environmental Audit - additional point

Hi Denise

Further to our letter, one of our key issues throughout construction and commencement of operation at Silverton has been the timing of bat survey.

We recommend that all survey and monitoring related to bat use of the site and bat mortality is reviewed to ensure that there is at least one dataset from March. An absence of this survey period potentially affects any predictions about bat utilisation or mortality.

Background to the issue:

- NGH Environmental undertook the pre-construction bird and bat baseline survey in 2016-2017 but failed to survey during identified times of key life cycle events (fledging) and bat activity (migration). The 'autumn' survey was undertaken in late May/early June and likely missed bat fledgling and/or migration.
- DPE/OEH feedback during preparation of the Bird and Bat Adaptive management Plan (BBAMP) (13 April 2018) included a need for bat utilisation survey to be undertaken in March. This requirement was based on an expert review of the Summer 2016 and Winter 2017 survey results (Pennay 2017), which stated that bat survey should be undertaken during the period of highest bat activity and risk of mortality in March.
- The BBAMP uploaded to the AGL website after its approval was unfortunately not revised to adequately incorporate our feedback. The incomplete BBAMP was then implemented by Skylos Ecology and Biosis.
- In an initial review of the first annual BBAMP report in February this year, we identified that the March survey was missing – autumn bat utilisation surveys were conducted by Biosis during May in 2019 and late April to May in 2020. We alerted Biosis about the issue on March 1, who then made a concerted effort to survey during March.
- The mis-timing of autumn survey is possibly an understandable attempt by Biosis to match annual monitoring with the 2016/17 baseline survey.

BCD has received a request from Biosis for comment on the Bird & Bat Mortality Monitoring Year 1 report (Elmoby Ecology, March 2021) but have not yet reviewed it in detail. Carcass persistence trials are reported to have been undertaken in May and November 2020 to be repeated in Spring and Autumn in 2021/22. It is preferable that the autumn trial be conducted in March – we will seek advice about implications for timing alterations on statistical rigour.

Let me know if you need any more information

Kind regards

Miranda

**Miranda Kerr**

**Senior Biodiversity Conservation Officer**

Biodiversity and Conservation, South West

PO Box 1040, Albury NSW 2640

Ph 02 6022 0607

---

**From:** Denise Corish <denise.corish@treoenvironment.com>  
**Sent:** Sunday, 23 May 2021 7:47 AM  
**To:** ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>  
**Cc:** Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>; Simon Stirrat <Simon.Stirrat@environment.nsw.gov.au>  
**Subject:** RE: BCD Response RE: Silverton Wind Farm 2018-2021 Independent Environmental Audit

Hi Andrew,

Thanks so much for your response. All matters detailed in your letter dated 20 May 2021 will be captured within the scope of the Independent Environmental Audit.

Kind regards,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
[www.treoenvironment.com](http://www.treoenvironment.com)

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**From:** ROG South West Region Mailbox <[rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au)>  
**Sent:** Thursday, 20 May 2021 8:36 AM  
**To:** Denise Corish <[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)>  
**Cc:** Miranda Kerr <[Miranda.Kerr@environment.nsw.gov.au](mailto:Miranda.Kerr@environment.nsw.gov.au)>; Simon Stirrat <[Simon.Stirrat@environment.nsw.gov.au](mailto:Simon.Stirrat@environment.nsw.gov.au)>  
**Subject:** BCD Response RE: Silverton Wind Farm 2018-2021 Independent Environmental Audit

Hi Denise,

Please find attached comments for consideration in the Independent Environmental Audit of the Silverton Wind Farm (2018-2021).

The short timeframe for this request has restricted our feedback.

If you have any questions please contact Miranda Kerr, Senior Biodiversity Conservation Officer on 02 6022 0607 or via [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au).

Regards

**Andrew Fisher**  
**Senior Team Leader, Planning – South West**

Biodiversity and Conservation | Department of Planning, Industry and Environment  
**T** 02 6022 0623 | **M** 0427 562 844 | **E** [andrew.fisher@environment.nsw.gov.au](mailto:andrew.fisher@environment.nsw.gov.au)



PO Box 1040, 512 Dean St, Albury, NSW 2640

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)

Contact the South West Planning Team about biodiversity planning matters by emailing [rog.southwest@environment.nsw.gov.au](mailto:rog.southwest@environment.nsw.gov.au).



*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

---

**From:** Denise Corish <[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)>  
**Sent:** Wednesday, 12 May 2021 8:23 PM  
**To:** Andrew Fisher <[Andrew.Fisher@environment.nsw.gov.au](mailto:Andrew.Fisher@environment.nsw.gov.au)>  
**Subject:** Silvertown Wind Farm 2018-2021 Independent Environmental Audit

Dear Mr Fisher,

I refer to the attached correspondence from the Department of Planning, Industry and Environment (the Department) granting approval for Denise Corish of Treo Environment to conduct the Independent Environmental Audit of the Silvertown Wind Farm (2018-2021).

In accordance with the Independent Audit Post Approval Requirements (May 2020), feedback is requested from the Biodiversity Conservation Division on the scope of the audit. To this end, please find attached a letter providing additional information on the scope of the audit. To enable timely completion of the audit and demonstrate compliance with the audit period defined in the Project Approval, your feedback (should you have any) is requested by **20 May 2021**.

Thank you in advance for your consideration of this matter.

Sincerely,  
Denise



Denise Corish  
**Manager, Environmental Performance and Assurance**

**M:** 0448 039 552  
78 Denison Street  
Bondi Junction NSW 2022  
[denise.corish@treoenvironment.com](mailto:denise.corish@treoenvironment.com)  
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**From:** [Tracey Stephens](#)  
**To:** [Denise Corish](#)  
**Subject:** Silverton Wind Farm 2018 – 2021 Independent Environmental Audit  
**Date:** Wednesday, 16 June 2021 10:49:21 AM  
**Attachments:** [image001.png](#)

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## Silverton Wind Farm Project Approval 08\_0022 (Project Approval)

Hi Denise,

Reference is made to correspondence to Council dated 8 June 2021. Thank you for the opportunity to comment.

Council wishes to advise that it does not have any particular comment to make or issues to raise in regards to the scope of the Independent audit.

The proposal is outside of Council's Local Government Area and is located within the Unincorporated Area of NSW.

Council staff have not carried out any environmental or planning inspections of the project site due to it being outside of its jurisdiction, and therefore can not provide any detailed advice.

Council suggests that contact should be made with the EPA (re Environmental Protection Licence), NSW Crown Lands (who manage the Unincorporated Area) and also the Silverton Village Committee for their comment/feedback, if not already done.

Thank you.

Kind regards,  
Tracey.

### **Tracey Stephens**

Town Planner  
240 Blende Street  
PO Box 448

Broken Hill NSW 2880

**Phone** 08 8080 3313

[Tracey.Stephens@brokenhill.nsw.gov.au](mailto:Tracey.Stephens@brokenhill.nsw.gov.au)

[www.brokenhill.nsw.gov.au](http://www.brokenhill.nsw.gov.au)



*We acknowledge the traditional owners of the land on which we live and work, and pay our respects to their elders past, present, and emerging.*

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## Denise Corish

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**From:** Denise Corish  
**Sent:** Friday, 21 May 2021 11:49 AM  
**To:** Kath Elliott  
**Cc:** Marina Draper  
**Subject:** Re: Silverton CCC

Hi Kath

Thanks so much - very helpful. Confirming our earlier discussion that there are no specific issues that the CCC would like included in the audit scope.

Kind regards  
Denise

Sent from my iPhone

On 21 May 2021, at 11:08 am, Kath Elliott <kath@kecomms.com.au> wrote:

Hello Denise,  
See attached letter for your audit.  
Give me a call if you need anything further

Regards  
Kath Elliott

<image001.png>

PO Box 55 Hamilton NSW 2303 Phone 0412003 272  
Email [kath@kecomms.com.au](mailto:kath@kecomms.com.au) Web [kathelliott.com.au](http://kathelliott.com.au)

<Audit response 2018-2021.docx>

## **Appendix E Meeting Minutes**

## 2018 – 2021 Silverton Wind Farm Independent Environmental Audit Opening Meeting

Date	3 June 2021	
Time	11:00am to 12:00pm	
Chair	Denise Corish	Environmental Auditor (Treo Environment)
Register of Attendees	Jo Stone Sara Regio Candeias Richard Armstrong Samantha Mar Simon Philippides Marina Draper Alana Philp Michael Brownlie Winni Taylor	Head of Wind and Solar (AGL) Environmental Business Partner (AGL) Asset Leader Wind and Solar NSW/QLD (AGL) Asset Performance Analyst Wind and Solar NSW/QLD (AGL) AGL Environment Advisor, Renewables VIC/NSW (AGL) Manager Community Relations (AGL) Wind Site Administrative Assistant (GE Renewable Energy) Site Services Manager (GE Renewable Energy) EHS Advisor for Services (GE Renewable Energy)

### Objectives

The objective of the audit is to provide reasonable assurance that the Silverton Wind Farm is operating in accordance with the Project Approval, Environment Protection Licence and Environmental Management Plans.

The requirement to conduct an Independent Environmental Audit is reflected in the Project Approval, Schedule 4, Condition 7. Specifically, within one year of commencement of construction, and every three years thereafter, an Independent Environmental Audit must be conducted of the project.

### Scope and Criteria

In accordance with the Independent Audit Post Approval Requirements (DPIE, May 2020) (**Requirements**), the scope of the audit includes:

- An assessment of compliance against:
  - Relevant conditions of Project Approval 08\_0022
  - Environmental Management Plans and Sub-plans and other relevant post approval documents
  - Environment Protection Licence 20882
- An assessment of the environmental performance of the development including impacts, physical extent and environmental compliance
- An assessment of the implementation of previous audit findings, recommendations and actions
- An evaluation of the adequacy of the Environmental Management Plan to achieve legislative requirements and drive performance improvements.

In addition to the above, the Requirements specify that the auditor must consult with the Department of Planning, Industry and Environment (DPIE) who may request that other parties or agencies are consulted on the scope of the audit. Consultation commenced in May 2021 and DPIE advised the auditor to consult with the following stakeholders:

- NSW Environment Protection Authority (EPA)
- Transport for NSW
- Biodiversity Conservation Division (previously the Office of Environment and Heritage)
- Broken Hill Council

- Community Consultative Committee.

### Resources

- Environmental and/or site personnel with access to documentation
- Technical/project personnel
- Community manager
- Consultants (where relevant)
- Site-based personnel to guide site inspection and provide relevant records/documents.

### Audit Period

- Reflecting the requirements of the Project Approval, the audit period is three years.
- The previous audit was commissioned on 11 May 2018.
- This audit was commissioned on 10 May 2021 and the audit period is May 2018 to May 2021.

### Audit Schedule

The draft audit schedule is provided below for discussion.

Task	Date
Audit commissioning	10 May 2021
Conduct audit	10 May to 24 June 2021
Opening meeting	3 June 2021
Site inspection	10 June 2021
Closing meeting (discussion of preliminary audit findings)	24 June 2021 (TBC)
Draft report	2 July 2021
AGL review	5 July to 19 July 2021
Final report	26 July 2021
AGL – Response to audit findings	27 July to 6 August 2021
DPIE submission (maximum of three months after commissioning – Schedule 4, CoA 8)	10 August 2021

### Methodology

- Independent Audit Post Approval Requirements (DPIE, May 2020)
- ISO 19011:2018 – Guidelines for Auditing Management Systems.

### Items for Discussion

- Site inspection start time.

## 2018 – 2021 Silverton Wind Farm Independent Environmental Audit Closing Meeting

<b>Date</b>	28 June 2021	
<b>Time</b>	2:30pm to 3:30pm	
<b>Chair</b>	Denise Corish	Environmental Auditor (Treo Environment)
<b>Register of Attendees</b>	Jo Stone Adam Mackett Sara Regio Candeias Samantha Mar Simon Philippides Marina Draper Melissa Plum Alana Philp	Head of Wind and Solar (AGL) Project Director – Silverton Wind Farm, Major Projects (AGL) Environmental Business Partner (AGL) Asset Performance Analyst Wind and Solar NSW/QLD (AGL) Environment Advisor, Renewables VIC/NSW (AGL) Manager Community Relations (AGL) Project Coordinator, Silverton Wind Farm (AGL) Wind Site Administrative Assistant (GE Renewable Energy)

### Agenda

1. 2018 IEA Audit Findings
  - a. All previous audit findings have been assessed as closed.
2. Preliminary Audit Findings and Recommendations
  - a. Three (3) non-compliances, all of which were assessed as low risk
  - b. Six (6) opportunities for improvement.
3. Audit Schedule – The timing of remaining tasks in the Audit Program (Table 1) will be confirmed.

**Table 1: Audit Program**

Task	Date
Audit commissioning	10 May 2021
Conduct audit	10 May to 24 June 2021
Opening meeting	3 June 2021
Site inspection	10 June 2021
Closing meeting (discussion of preliminary audit findings)	28 June 2021
Draft report	2 July 2021
AGL review	5 July to 19 July 2021
Final report	26 July 2021
AGL – Response to audit findings	27 July to 6 August 2021
DPIE submission (maximum of three months after commissioning)	10 August 2021

## **Appendix F Auditor Approval**



Mr Simon Philippides  
Environment Advisor - Renewables  
699 BOURKE STREET  
DOCKLANDS 3008

31/03/2021

Dear Mr Philippides

**Silverton Wind Farm - MP08\_0022  
IEA Auditor Approval 2021**

I refer to your request (MP08\_0022-PA-8) for the Secretary's approval of a suitably qualified person to prepare the 2021 Independent Environment Audit for Silverton Wind Farm (the Project) MP08\_0022 (the Approval) as modified.

Having considered the qualifications and experience of Ms. Denise Corish of Treo Environment Pty Ltd the Secretary endorses the appointment of Ms Corish to undertake the audit in accordance with Condition 7 of Schedule 4 of the approval. This approval is conditional on Ms Corish being independent of the development.

The audit is to be conducted in accordance with the approval condition and with the IAPAR. A copy of the requirements can be located at <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems

The audit report is to:

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

Within 3 months of completing the audit, or otherwise as agreed by the Secretary, in accordance with Condition 8 Schedule 4, AGL Hydro Partnership Pty Ltd (AGL) is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations.

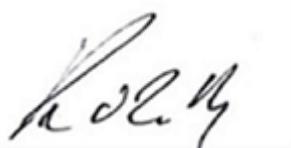
Prior to submitting the audit report to the Secretary, it is recommended that AGL review the report to ensure it complies with the relevant approval condition.

Please ensure this correspondence is appended to the Independent Audit Report.

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

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', is positioned above the printed name.

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

## Appendix G Independent Audit Report Declaration Form


Declaration of Independence – Auditor	
<b>Project Name</b>	Silverton Wind Farm
<b>Consent Number</b>	08_0022
<b>Description of Project</b>	The Silverton Wind Farm is located in the Barrier Ranges of western New South Wales (NSW), approximately 5km north of the Silverton township and 25km north-west of Broken Hill. The 200 MW Silverton Wind Farm (the Project) consists of 58 x GE 3.43-130 wind turbines, an electrical substation and an Operations and Maintenance Facility.
<b>Project Address</b>	Barrier Range, Silverton NSW
<b>Proponent</b>	The Proponent as named on the Project Approval is Silverton Wind Farm Developments Pty Ltd, however the associated lease was assigned to PARF Company 8 Pty Ltd as trustee for the Silverton Project Trust on 18 January 2017. PARF – a partnership between AGL, QIC and the Future Fund – is the asset owner, and AGL is the sole asset manager.
<b>Date</b>	18 July 2021

I declare that:

- I. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- II. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- III. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- IV. I am not an Environmental Representative for the project; and
- V. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

<b>Name of Auditor</b>	Denise Corish
<b>Signature</b>	
<b>Qualification</b>	Environmental Lead Auditor with Exemplar Global
<b>Company</b>	Treo Environment Pty Ltd

Treo Environment

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