

14 November 2025



Department of Planning, Housing and Infrastructure
4 Parramatta Square,
12 Darcy Street
Parramatta NSW 2150

Dear Planning Secretary,

Re: SSD-6686 - Bango Wind Farm – Independent Environmental Audit #3

An Independent Environmental Audit (IEA) was undertaken on behalf of Bango Wind Farm Pty Ltd (BWF) to meet the requirements of Condition 6, Schedule 4 of State Significant Development Approval SSD-6686.

The audit was conducted on site by KPMG on 14 August 2025. The audit team was led by Dylan Jones of KPMG, and BWF was represented on site by Sheree Kidziak and Grant Stepien. Please see Table 1 for BWF's responses to the findings and recommendations outlined in Section 4.13 and the Executive Summary of the audit report.

I trust that the Independent Environmental Audit meets the requirements of the Department in addressing Condition 6 of Schedule 4. BWF will make the audit report publicly available on the Bango Wind Farm project website, along with the summary of recommendations/observations and responses provided in **Table 1**.

Pursuant to Condition 2, Schedule 4 of SSD-6686, BWF has completed a review of the strategies, plans, and programs required under the consent. The review determined that no further updates are necessary, from the audit at this time.

It is noted that that several management plans have been updated and are currently at various stages of Approval. The review was completed on the latest draft version of each plan, submitted for Approval. Any future changes will be made per relevant agencies' requests and DPHI recommendations. Additionally, the auditor was provided the latest draft revisions and did not recommend any updates.

Should you have any questions or require further information, please do not hesitate to contact me on 0403 473 127

Yours sincerely,

A handwritten signature in black ink that reads "Sheree Kidziak". The script is cursive and fluid.

Sheree Kidziak
Environmental Advisor
For and behalf of Bango Wind Farm Pty Ltd

Table 1 KPMG Audit recommendations and proponent's response

Reference	Requirement Details	IEA Details and Recommendations	BWF response and proposed action
Non-compliance BWF-03_NC-1	2-2 TERMS OF CONSENT The Applicant shall carry out the development: (c) generally in accordance with the EIS; and (d) in accordance with the conditions of this consent. <ul style="list-style-type: none"> Note: The general layout of the development is shown in Appendix 2. 	Considering the non-compliances raised against CoA 3-3 and 3-11 (refer to the findings below), this triggers an additional non-compliance against CoA 2-2. As stated below, the Auditor considers that both non-compliances were appropriately resolved within the audit period and no further corrective actions are required. Recommendation: Nil	N/A
Self-reported Non-compliance. BWF-03_NC-2	3-3 Lighting The Applicant must: (c) minimise the off-site lighting impacts of the development; (d) ensure that any aviation hazard lighting complies with CASA's requirements;	Due to a power outage associated with the Transgrid substation on 8 May 2023, the WTG aviation lighting temporarily failed to operate while the cause of the power outage was being investigated. Upon reenergisation, several WTG lights were either not operating or were operating in a flashing state. CASA's aviation lighting requirements are for "200 candela low intensity steady red night lighting". A complaint was made to DPHI regarding the flashing aviation lighting, which investigated the site on 20 August and 4 September 2023 and confirmed that the lights were flashing. BWF self-reported the power outage incident to CASA and DPHI on 13 June and 29 June 2023, respectively. On 9 September 2023 DPHI issued a warning letter to BWF for failing to comply with CoA 3-3 (b) of the planning approval. The warning letter confirmed that a breach had occurred, however no formal action was required, given several mitigating circumstances. Based on the outcome of the DPHI investigation and the warning letter issued, the Auditor has recorded the non-compliance within this audit report. Recommendation: Nil. It is understood that measures have been implemented to rectify the lighting issue.	N/A

Reference	Requirement Details	IEA Details and Recommendations	BWF response and proposed action
Non-compliance. BWF-03_NC-3	3-11 Operational Noise Monitoring Within 3 months of the commencement of operations, (or the commencement of operation of a cluster of turbines, if the development is to be staged), the Applicant must: (b) undertake noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and • submit a copy of the monitoring results to the Department and the EPA	Operations formally commenced on 14 December 2023. The operational noise compliance testing report was submitted to DPHI on 13 March 2024 (Ref: SSD-PA-58), however it was not submitted to the EPA until the 20 March 2024, which is outside the 3-month period, triggering a non-compliance against CoA 3-11 (b). The Auditor considers that the non-compliance was resolved on 20 March 2024 when the noise compliance testing report was submitted to the EPA. Recommendation: Nil	N/A
Opportunity for Improvement BWF-03_OFI-1	3-16 Operating Conditions The Applicant must: (f) store and handle all dangerous or hazardous materials on site in accordance AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version. (g) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur	During the site inspection the Auditor identified an external waste oil storage area including several waste oil drums that were stored on exposed ground without bunding or secondary containment provided. Other oil drums were located on bunds, however, given the bunds were not protected (i.e., without roofing) the bunds were able to collect water during rain events and potentially discharge to exposed ground surfaces. No evidence of spills or leaks were observed by the Auditor. Inspection of the nearby dedicated oil storage shed revealed that there was insufficient space to store all the waste oil drums. The General Electric Site Manager mentioned that there was a project underway to install racking and shelving in the oil storage shed to increase storage capacity. The Auditor sighted that racking and shelving had been procured and was present on site, ready to be installed. Recommendation: Move all waste oil drums to bunded and covered storage locations as soon as practicable and prior to rainfall.	Waste drums have been stored outdoors while the oil shed is fitted for new shelving and bunding. Waste disposal is awaiting supplier collection and will allow for adequate storage inside the oil shed. Since the audit, all oil drums were moved inside the oil storage shed; any remaining outdoor drums are empty or hold non-oil waste, all are placed on bunds and checked daily for rainwater removal. BWF has committed to finalising the oil shed shelving works/ensure waste collection is completed, and ensure all drums are stored inside the oil shed by 1st March 2026, or earlier.
Opportunity for Improvement BWF-03_OFI-2	3-17 BIODIVERSITY Restrictions on Clearing and Habitat The Applicant must: (b) ensure that no more than 84.2 hectares (ha) of Box Gum Woodland EEC (LA 103), including Box Gum Woodland derived grassland, is cleared for the development, unless the Secretary agrees otherwise.	Final clearance limits were provided by the EPC Contractor following construction in GIS shapefile and a MS Excel tracker, demonstrating compliance with the approved clearance limits. The number of biodiversity credits that were retired were based on these actual final clearance limits. While additional clearing is not expected to be required during the operational phase, there may be ad-hoc instances where isolated clearing is required in areas not previously cleared during construction as part of maintenance activities. Recommendation: There is an opportunity for the project to develop an operational phase vegetation clearance tracker to 'draw down' on residual approved limits and biodiversity offset limits. The tracker should be maintained as a live document to be able to validate current total	An Operational Vegetation Tracking Spreadsheet is being developed to assist in planning and track any potential ad-hoc clearing required as part of the maintenance activities. This will be maintained internally to demonstrate operation compliance and ensure there are no exceedances to the Project Clearing Limits, or any exceedances to the number of biodiversity credits retired for BWF. This will be finalised by 31 st December 2025.

Reference	Requirement Details	IEA Details and Recommendations	BWF response and proposed action
Opportunity for Improvement BWF-03_OFI-3	<p>4-1 ENVIRONMENTAL MANAGEMENT</p> <p>Environmental Management Strategy</p> <p>Following approval, the Applicant shall implement the Environmental Management Strategy.</p> <p>EMS Section 6.2.2 (Environmental Training) states “Targeted environmental training will be conducted for key operations tasks, or work areas that are considered particularly sensitive e.g. site access and biodiversity management. The environmental training content will be developed by the FSA Provider in consultation with the Site Manager.”</p>	<p>clearance amounts and demonstrate ongoing compliance during operations.</p> <p>The Auditor noted that no specific training had been provided in relation to bird and bat strike management during the operations phase. Given the number and frequency of bird and bat strike triggers that have occurred on the project, there may be benefit in providing onsite workers with specific training in relation to their responsibilities regarding monitoring and reporting of bird and bat strikes.</p> <p>Recommendation: Consider implementing an environmental awareness training program for all GE and BWF employees to raise awareness of key requirements such as bird and bat strike management</p>	<p>The Operations Manager and Environmental Advisor have reviewed the current Site Induction package. As part of this review, the Environmental Advisor will develop additional training slides that highlight the site's environmental sensitivities—including bird and bat strikes, noise, visual impacts, biodiversity, heritage, erosion and sediment control and pollution, to be delivered by toolbox to GE.</p> <p>This toolbox will be delivered to GE Biannually to further enhance environmental awareness. It will aim to meet environmental awareness training requirements and reinforce notification requirements to support compliance across operations.</p> <p>The first Environmental awareness training will be provided by 28th February 2026.</p>