

Independent Audit No.3

Bango Wind Farm

SSD-6686

September 2025



Audit Details

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Inherent Limitations

This Report has been prepared at the request of BWF Nominees Pty Ltd as trustee for BWF Trust (**BWF**) in the Scope Section of KPMG's engagement letter dated 24th July 2025.

The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

Due to the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected. Further, the internal control structure, within which the control procedures that have been subject to the procedures we performed operate, has not been reviewed in its entirely and, therefore, no opinion or view is expressed as to its effectiveness of the greater internal control structure. The procedures performed were not designed to detect all weaknesses in control procedures as they are not performed continuously throughout the period and the tests performed on the control procedures are on sample basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by BWF employees consulted as part of the process.

KPMG has indicated within this Report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the Report.

KPMG is under no obligation in any circumstance to update this Report, in either oral or written form, for events occurring after the Report has been issued in final form.

The findings in this Report have been formed on the above basis.

Third Party Reliance

This Report is solely for the purpose set out in the Audit Objectives and Scope Section and for BWF's information and is not to be used for any other purpose or distributed to any other party without KPMG's prior written consent.

This Report has been prepared at the request of BWF, in accordance with the terms of KPMG's engagement letter dated 24th July 2025. Other than our responsibility to BWF, neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party. Any reliance placed is that party's sole responsibility.





Executive Summary

Background

KPMG was engaged by BWF Nominees Pty Ltd (BWF), to undertake an Independent Environmental Audit (IEA) at the Bango Wind Farm project (the Project) located within the Hilltop and Yass Valley Local Government Areas (LGA), approximately 8km Southwest of Rye Park and 20km North of Yass. The IEA was undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR 2020) as required by condition of approval (CoA) 4-6 of State Significant Development (SSD-6686).

This was the third IEA to be undertaken at the Site and was required to be commissioned within three years of the previous IEA. The audit period was defined as being from the date of the previous IEA (24 August 2022) to the date of the current IEA (14 August 2025).

The Project commenced construction on 16 August 2019 and formally commenced operations on 14 December 2023. The audit period covers both construction and operational activities, however it is noted that the 'construction' related activities that occurred during the audit period primarily involved testing and commissioning of wind turbine generators (WTGs). The IEA therefore sought to assess the implementation of both construction and operational elements of the CoAs and management plan requirements.

Based on the evidence provided, the observations made and compliance findings of this audit, the Project is considered to have demonstrated good environmental performance during the audit period. Three (3) non-compliances were identified; however they were administrative in nature, with no associated environmental impacts. One (1) minor finding was identified during the site inspection (waste oil storage) that required rectification (refer to *Site Inspection*). The project transitioned from construction to operations during the audit period, which was a focus area of this audit. In general, this transition occurred without any significant issues that have been identified by the Auditor, with post-construction and pre-operations requirements generally having been satisfied. The BWF site operations and management teams were considered to demonstrate a strong awareness of their environmental obligations, including management plan requirements and relevant SSD-6686 CoAs. Three (3) recommendations have been provided for CWRF's consideration.

Site Inspection

One (1) finding was identified during the site inspection. An external waste oil storage area was observed, 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. An opportunity for improvement was raised in relation to this finding, with recommendations provided to rectify the management of oil waste drums as soon as possible. Refer to finding **BWF-03_OFI-1** against CoA 3-16.



Audit Findings

Table E.1: Summary of Audit Findings

Reference	Requirement Details	Finding Details	Status
Non- compliance BWF-03_NC-1	2-2 TERMS OF CONSENT The Applicant shall carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent. a) 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	Closed
Self-reported Non- compliance. BWF-03_NC-2	3-3 Lighting The Applicant must: (a) minimise the off-site lighting impacts of the development; (b) 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.	Closed
Non- compliance.	3-11 Operational Noise Monitoring Within 3 months of the commencement of operations, (or	Operations formally commenced on 14 December 2023. The operational noise compliance testing report was submitted to DPHI on 13 March 2024	Closed



Reference	Requirement Details	Finding Details	Status
BWF-03_NC-3	the commencement of operation of a cluster of turbines, if the development is to be staged), the Applicant must: (a) 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.	(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.	
Opportunity for Improvement BWF-03_OFI-1	3-16 Operating Conditions The Applicant must: (d) 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. (e) 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.	Open
Opportunity for Improvement BWF-03_OFI-2	3-17 BIODIVERSITY Restrictions on Clearing and Habitat The Applicant must: (a) 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	Open



Reference	Requirement Details	Finding Details	Status
		approved limits and biodiversity offset limits. The tracker should be maintained as a live document to be able to validate current total clearance amounts and demonstrate ongoing compliance during operations.	
Opportunity for Improvement BWF-03_OFI-3	4-1 ENVIRONMENTAL MANAGEMENT Environmental Management Strategy Following approval, the Applicant shall implement the Environmental Management Strategy. 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."	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. 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.	Open



1 Introduction

1.1 Background

KPMG was engaged by BWF Nominees Pty Ltd (BWF), to undertake an Independent Environmental Audit (IEA) at the Bango Wind Farm project (the Project) located within the Hilltop and Yass Valley Local Government Areas (LGA), approximately 8km Southwest of Rye Park and 20km North of Yass. The IEA was undertaken in accordance with the *Independent Audit Post Approval Requirements 2020* (IAPAR 2020) as required by condition of approval (CoA) 4-6 of State Significant Development (SSD-6686).

This was the third IEA to be undertaken at the Site and was required to be commissioned within three years of the previous IEA. The audit period was defined as being from the date of the previous IEA (24 August 2022) to the date of the current IEA (14 August 2025) (hereinafter referred to as the audit or the IEA).

The IEA sought to assess and provide findings on compliance with the Project's SSD Consent (SSD-6686) CoAs and to assess the implementation and effectiveness of the Project's operational environmental management plans in accordance with the methodology outlined within the IAPAR 2020.

Any references to 'audit', 'independent', 'review' and / or 'verification' in this report have not been used in the context of its respective meaning under assurance, audit and other standards issued by the Australian Auditing and Assurance Standards Board. As such, no opinions or conclusions intended to convey assurance, or an audit opinion, have been expressed in this report.

The evidence used to test the compliance status with respect to each CoA has been documented in Appendix A with a summary of audit findings and recommendations provided in Section 4.13.

1.2 Project Details

The Project received development consent as a State Significant Development (SSD-6686) under the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) on 1 May 2018, and following a third-party appeal, was approved by the Land and Environmental Court of NSW in December 2018. The revised approval included a reduction from 71 to 46 wind turbine generators (WTGs). The Project is located within the Hilltop and Yass Valley Local Government Areas (LGA), approximately 8km Southwest of Rye Park and 20km North of Yass. The approved Bango Wind Farm development consists of the construction and operation up to 46 wind WTGs, access roads, hardstands, laydown areas, internal electrical reticulation, a substation, an operations and maintenance facility, overhead transmission lines and a switching station.

Since receiving initial approval in May 2018, the Project has undergone one (1) approved modification (7 June 2019). This change allowed for the development of a separate freehold lot dedicated to the substation, making it possible for the proponent to secure long-term leases.



The Project commenced construction on 16 August 2019 and formally commenced operations on 14 December 2023. The audit period covers both construction and operational activities, however it is noted that the 'construction' related activities that occurred during the audit period primarily involved testing and commissioning of WTGs. The IEA therefore sought to assess the implementation of both construction and operational elements of the CoAs and management plan requirements.

1.3 Audit Team

In accordance with CoA 4-6 (a) of SSD-6686 and the IAPAR 2020, Independent Auditors must be suitably qualified, experienced and independent of the Project, and endorsed by the Planning Secretary prior to each IEA. Details of the KPMG audit team for this audit are as follows:

Table 1.1: Audit Team Details

Name	Company Title	Audit Position	Certifications
			Exemplar Global Lead Environmental Auditor – Certificate No. C-464532 M. Environmental Engineering Management
Dylan Jones	KPMG Director	Lead Auditor	B. Environmental Science & Management
			Certified Environmental Practitioner (CEnvP)
			Infrastructure Sustainability Accredited Professional (ISAP)
		Alternate Lead Auditor and	Principal Environmental Auditor – Institute of Environmental Management & Assessment (IEMA)
Gary Selwyn	KPMG Partner	Technical Reviewer	MSc. Environmental Science
			BSc (Hons). Biological Sciences
Manya Narain	KPMG Consultant	Audit Team Member / Assistant	B. Biomedical Engineering (Hons)

Endorsement of the Audit Team was provided by DPHI on 23 July 2025 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).



2 Audit Objectives and Scope

2.1 Audit Objectives

The objective of this audit was to satisfy SSD-6686 CoA 4-6 by undertaking an independent assessment of environmental performance and compliance against the Project's conditions of approval and environmental mitigation measures. The DPHI auditor endorsement letter confirmed that the audit must be undertaken in accordance with IAPAR 2020.

2.2 Audit Scope

The scope of the audit included undertaking an assessment of compliance against the project's conditions of approval of SSD-6686 Schedule 2, 3 and 4 as they apply to both the construction and operational status of the Project throughout the audit period.

An overview of the audit scope undertaken by the KPMG audit team includes the following:

- Review the implementation of management plans, including:
 - Environmental Management Strategy Rev 3, dated 22 December 2022.
 - Heritage Management Plan, Rev 004, dated 15 April 2025.
 - Biodiversity Management Plan, Rev 3, dated 10 December 2020
 - Bird and Bat Adaptive Management Plan, dated 29 December 2021
 - Traffic Management Plan, dated 29 July 2024.
 - Golden Hollows Biodiversity Stewardship Agreement, dated 27 September 2022 (including management requirements)
- Site inspection conducted on 14 August 2025:
 - A high-level assessment of the effectiveness of environmental management plans.
 - Assess general environmental performance.
 - · Review of records.
 - Interviews with site personnel.
- Conduct audit interviews at the BWF site office.

The audit scope did not include an assessment of compliance against the project's Environmental Protection Licence (EPL 21286), or its Approval made under the Environmental Protection and Biodiversity Act 1999 (EPBC 2013/6810) as this is not required by the IAPAR 2020.





2.3 Audit Period

This is the third IEA undertaken on the Project and was designed to cover all activities from the date of the second audit to the date the following IEA was conducted. The audit period was therefore defined as the period between **24 August 2022 to 14 August 2025.**



3 Audit Methodology

3.1 Endorsement of the Audit Team

The KPMG Audit team included:

- Dylan Jones Lead Auditor;
- Gary Selwyn Alternate Lead Auditor / Technical Reviewer; and,
- Manya Narain Audit Team Member / Assistant.

Endorsement of the Audit Team was provided by DPHI on 23 July 2025 (refer to the Planning Secretary Audit Team Endorsement presented in Appendix B).

3.2 Audit Process

The following sections describe the processes that comprised the IEA, with site inspection and personnel interview components completed on 14 August 2025, followed by additional document reviews, consultation and reporting. The IEA process was aligned with the principles of *ISO* 19011:2018 Guidelines for Auditing Management Systems and the IAPAR 2020 requirements.

3.2.1 Audit Preparation

A kick off meeting was held between KPMG and BWF on 25 July 2025, ahead of the audit. The kick off meeting was used to establish project objectives, confirm dates, timelines and methods of communication. Following the kick off meeting the Lead Auditor prepared an Audit Plan/Agenda and Request for Information documents, which were distributed to the BWF team in preparation for the IEA (refer to Appendix E for the Audit Agenda). Upon receipt of documents from BWF and via review of documents publicly available on the Squadron Energy BWF project website, document assessment (refer to Section 3.2.6) commenced in advance of the audit.

3.2.2 Consultation

In accordance with Section 3.2 of the IAPAR 2020 and CoA 4-6 (b), consultation request emails were sent to DPHI, the NSW Environment Protection Authority (EPA), Hilltops Council and Yass Valley Council, to identify focus areas for the audit or other matters that the Auditor should be made aware of. Based on feedback received from DPHI, further consultation request emails were sent to NSW DCCEEW CPHR (previously known as BCS), the Community Consultative Committee (CCC) and the Civil Aviation Safety Authority (CASA).

Responses were received from DPHI, the CCC, CPHR and the EPA. At the time of finalising this audit report responses had not been received from CASA or the two (2) Councils.





DPHI

Several aspects were raised by DPHI for the Auditor to address and review, including drawing attention to specific complaints and compliance matters held on record by DPHI. Some of the matters raised by DPHI were standard items requiring consideration in accordance with the IAPAR 2020. Other specific matters included:

- Ensuring all notifications have been carried out, e.g. incident/non-compliance reporting, commencement of construction/operation etc.
- Biodiversity impacts are addressed appropriately, particularly in relation to the implementation of the Bird and Bat Adaptive Management Program and investigations of biodiversity triggers.
- Lighting impacts are addressed appropriately, particularly in relation to the implementation of casa lighting compliance/requirements, design and record management around maintenance of lights and notification to affected parties.
- Noise impacts are addressed appropriately, particularly in relation to noise monitoring.

EPA

The EPA responded stating that they had nothing specific to raise other than the EPA's expectation that operations are compliant with the conditions of the environment protection licence.

DCCEEW CHPR

CHPR responded advising that their colleagues at DPHI had already responded, referring to the DPHI consultation referred to above.

Community Consultation Committee

The former Independent Chair for the BWF CCC responded advising that they resigned from the position in July 2024. The former chair provided the following feedback

"I established the CCC in 2013 and the CCC met on a quarterly basis during the development and construction of the wind farm, where members received updates on the activities on site. In the later years, the meetings moved to bi-annually and then annually as there were no operational issues."

Subsequent consultation request emails were sent to the current Independent Chair for BWF, noting that there have been no meeting held since 30 July 2024 under the former Independent Chair. No response was received from the current Independent Chair.

KPMG Response:

The audit scope included an assessment of all matters raised by DPHI. 'DPHI focus areas' are identified against the corresponding CoA within Appendix A for the specific matters raised by DPHI, with detailed descriptions of observations included. An additional description of these impacts is also provided in Section 4.10.

Refer to Appendix C for consultation records.



3.2.3 Opening Meeting

An opening meeting was held on site on 14 August 2025 with representatives from the BWF site operations and management teams, as per the Audit Attendance Sheet (refer to Appendix F). During the opening meeting the Auditor outlined the objective and the process of the IEA. BWF provided the Auditor with a summary of current and historical site activities including an overview of the specific WTG operations. Key matters such as any environmental incidents, non-compliances, environmental issues and risks and stakeholder interactions were discussed.

3.2.4 Site Inspection

A site inspection was undertaken on 14 August 2025 at the BWF site with representatives from the BWF environmental management and site operations teams. The site inspection was used to understand the nature of the operations and the extent to which environmental controls were implemented and managed across the site. The Auditor was provided full access to all areas requested for inspection.

Refer to details of the site inspection in Section 4.9 and photographs provided in Appendix D.

3.2.5 Interviews

Interviews were held with key personnel from the BWF site operations and management teams. These interviews were focused on the management of environmental aspects, and, where areas of concern may exist, what proposed means of risk control are undertaken and proposed to account for these concerns. Additionally, the interviews assisted the Auditor to understand the nature of the activities undertaken at the sites and to identify focus areas for the audit. Table 3.1 provides details of the personnel interviewed during the IEA.

Table 3.1: Personnel Interviewed

Name	Organisation	Position
Sheree Kidziak	Squadron Energy	Environmental Advisor
Grant Stepien	Squadron Energy	Operations Manager
Stephen Doyle	General Electric	Safety and Environmental Manager
Justin Rowles	General Electric	Site Manager

3.2.6 Document Assessment

Documentation relevant to the audit scope was collected and assessed by the audit team as evidence of compliance with a CoA. This included, but was not limited to, management plans, site induction



forms and presentations, monitoring and sampling records, correspondence, emergency response plans, plant and equipment maintenance registers and pre-approval documentation such as the Environmental Assessment (EA). Refer to Appendix H for a full list of documents reviewed as part of the IEA.

3.2.7 Closing Meeting

A closing meeting was held virtually at 11am on 18 August 2025 over Microsoft Teams. During the closing meeting the Lead Auditor presented the preliminary audit findings, including any identified potential non-compliances and opportunities for improvement. Where identified, additional documentary evidence was requested by the Audit team following the closing meeting to enable further assessment of compliance.

3.3 Compliance Evaluation

Considering the evidence gathered during audit execution, the IEA assessed and tested the compliance status of each CoA in the Audit Table, through application of the compliance descriptors detailed in *Table 2* of the IAPAR, as listed in *Table 3.2*.

Table 3.2: Compliance descriptors from Table 2 of the IAPAR

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 condition requirements have not been complied with within the scope of the audit. The Auditor has determined that one or more specific elements of the condition requirements have not been complied with within the scope of the audit. The Auditor has determined that one or more specific elements of the condition requirements have not been complied with within the scope of the audit. The Auditor has determined that one or more specific elements of the condition requirements have not been complied with within the scope of the audit. The Auditor has determined that one or more specific elements of the condition requirements have not been complied with within the scope of the audit. The Auditor has determined that one or more specific elements of the condition requirements have not been complied with within the scope of the audit. The Auditor has determined that the condition requirements have not been complied with within the scope of the audit. The Auditor has determined the condition requirements have not been complied with within the scope of the audit. The Auditor has determined the condition requirements have not been complied with within the scope of the audit. The Auditor has determined the condition requirements have not been complied with the condition requirements. The Auditor has determined the condition requirements have not been condition requirements. The Auditor has determined the condition requirements have not been conditional requirements. The Auditor has determined the condition requirements have not been conditional requirements. The Auditor has determined the condition requirements have not been conditional requirements. The Auditor has determined the condition requirements have not been conditional requirements. The Auditor has determined the condition requirements have not been conditional requirements. The Auditor has determined the condition requirements have not been condition	
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

¹ This includes non-compliances that occurred at some point within the audit period and were subsequently rectified, self-reported, and closed prior to the date of the audit.

Where appropriate, the Auditor also identified opportunities for improvement and provided recommendations for BWF's consideration, details of which are provided in Section 4.13 and Appendix A.



4 Audit Findings

4.1 Approvals and Documents Audited

Refer to Appendix H for details of the primary documents assessed as part of the IEA.

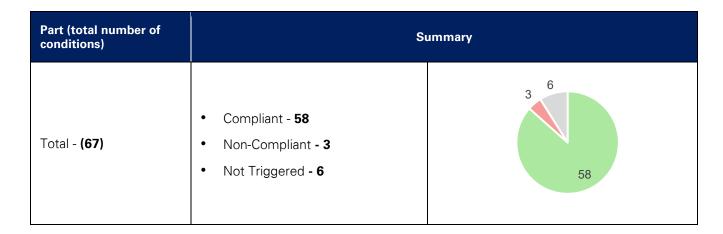
4.2 Compliance Assessment Summary

The Project was audited against 67 Conditions of Approval (CoA), with three (3) non-compliances identified. An assessment of each CoA is provided in Appendix A and summarised in *Table 4.1*. Details of the non-compliances are provided in Section 4.13.

Table 4.1: Compliance assessment summary

Part (total number of conditions)	Summary	
Schedule 2 - Administrative Conditions (23)	 Compliant - 19 Non-Compliant - 1 Not Triggered - 3 	1 3
Schedule 3 – Environmental Conditions General (37)	 Compliant - 32 Non-Compliant - 2 Not Triggered - 3 	32
Schedule 4 – Environmental Management, Reporting and Auditing (7)	 Compliant - 7 Non-Compliant - 0 Not Triggered - 0 	7





4.3 Notices, Orders, Penalty Notices and Prosecutions

There was one (1) Show Cause, and one (1) Warning Letter issued to BWF in accordance with the DPHI Compliance Policy during the audit period. On 11 September 2023 a Show Cause was issued to BWF in relation to community complaints and self-reported incident involving the failure of the project's aviation lighting to meet CASA's specific requirements. Following an investigation, on 9 October 2023 a Warning Letter was issued to BWF in response to the incident.

The Warning Letter confirmed that a breach of the Environmental Planning and Assessment Act 1979 (EP&A Act) had occurred, however, no formal regulatory action was required due to the circumstances, including:

- There was no known impact to the environment or public safety;
- The breach was a result of a sub-station power outage and circumstances outside of the control of BWF:
- Measures have been implemented to rectify the lights; and
- BWF have been cooperative throughout the investigation.

Refer to audit finding BWF-IEA-03 NC-2 in relation to CoA 3-3 for further details.

4.4 Incidents

As described in Section 4.3, there was one (1) notifiable incident during the audit period. In accordance with CoA 4-4, on 29 June 2023 BWF formally notified DPHI of an incident involving the WTG aviation lighting failure. The incident was also notified to CASA on 13 June 2013 while investigations into the power outage and lighting failure were underway. The power outage initially occurred on 8 May 2023 and BWF was initially unaware that certain WTG lighting had either failed or was flashing rather than in a steady sate as required by CASA. A non-compliance against CoA 3-3 has been raised in relation to this incident.

Refer to audit finding **BWF-IEA-03_NC-2** in relation to CoA 3-3 for further details.



4.5 Complaints

A Complaints Register is maintained monthly and is available on the BWF project website. Sighting of the Complaints Register identified there were six (6) complaints received during the audit period. Of these complaints, five (5) had been closed at the time of the audit. The Auditor reviewed the close out actions associated with these complaints which were considered appropriate. The one (1) open complaint related to visual impact, noise and gates being left open. The Auditor reviewed the details of this complaint which are documented against CoA 3-1 regarding visual impact mitigation. It was noted that visual impact assessments had been undertaken, and tree planting and maintenance had occurred to mitigate visual impacts for the affected property. The Auditor was advised by BWF that the complaint will be closed imminently.

4.6 Non-compliances

The IEA identified three (3) non-compliances during the audit period, one (1) of which had been self-reported by BWF. All non-compliances were administrative and are not likely to result in any actual environmental impacts. Details of the non-compliances identified during the IEA are listed in Section 4.13.

4.7 Previous Audit Findings

The previous audit report *Bango Wind Farm, Independent Environmental Audit, dated October 2022*, did not identify any non-compliances. However, four (4) recommendations were raised, as outlined in *Table 4.2*.

Table 4.2: Previous audit findings

Condition	Issue	Recommendation	Status as assessed during the audit
CoA 2.18	Updating and Staging of strategies plans or programs	CWPR have revised and resubmitted the Environmental Management System (EMS), for the commissioning and the operational phase of the Project. The revised EMS was submitted to the DPE for review in 2021. Comments were received from DPE June 2022, comments are being addressed and incorporated into the EMS, the document has not yet been finalised. CWPR are to ensure that they continue to follow up with DPE to gain approval of the EMS prior to the operational phase commencing.	Environmental management strategy Revision 3 was updated for operations, dated December 2022. DPHI approval letter received 20 January 2023. Closed
CoA 3.9	Operational Noise Monitoring	Operational noise monitoring has not been triggered as part of this IEA, this monitoring will be undertaken when the construction phase has been completed and the operational phase commences in early 2023.	Bango Wind Farm, Operational noise Validation Report, prepared by Sonus, dated June 2024. Closed



CoA 3.24	Designated Heavy and Over- Dimensional Vehicle Routes	Three non-compliances were reported during construction, three revisions of the Traffic Management Plan were undertaken as a result. CWPR were vigilant in their reporting and incident investigation and reviewing requirements. Signage used to inform contractors of the correct access route to the site should be removed if no longer required.	BWF confirmed via interviews that signage has been removed. Closed
CoA 3.36	Progressive Rehabilitation	CWPR have progressively rehabilitated areas throughout the site, in turn reducing the amount of disturbed ground exposed at any one time. CWPR was commended on the stable and good condition of the site considering the large amount of rainfall that occurred just weeks before the inspection.	Note only. Closed

4.8 Suitability of Environmental Management Plans

The Project is managed in accordance with the following management plans:

- Environmental Management Strategy Rev 3, dated 22 December 2022 (EMS).
- Heritage Management Plan, Rev 004, dated 15 April 2025 (HMP).
- Biodiversity Management Plan, Rev 3, dated 10 December 2020 (BMP).
- Bird and Bat Adaptive Management Plan, dated 29 December 2021 (BBAMP).
- Traffic Management Plan, dated 29 July 2024 (TMP).
- Golden Hollows Biodiversity Stewardship Agreement, dated 27 September 2022 (including management requirements)

The Environmental Management Strategy (EMS) is the overarching management plan for the Project, supported by topic-specific management plans. Appendix C1 to C6 of the current EMS contains environmental mitigation measures for air quality, noise management, waste management, telecommunications, visual impact and soil and water management, respectively. Mitigation measures for heritage, biodiversity, bird and bats and traffic are included in their respective management plans. All management plans have been approved by DPHI and, where required by the planning approval, prepared in consultation with relevant agencies. Refer to CoA 2-18 in Appendix A for details of DPHI approval letters during the audit period.

The current EMS (Rev 3) includes references to construction, operations and decommissioning phases. At the time of the audit the EMS and project management plans were in the process of being updated to focus on operations and to remove references to construction phase activities. A summary of the status of management plans is provided:



- EMS has been submitted to DPHI who have provided initial responses.
- TMP has been submitted to TfNSW and Councils for comment. Awaiting responses
- BMP has been submitted to CHPR. BWF currently responding to comments regarding rehabilitation
- HMP updated for operations and approved by DPHI 6 June 2025.
- BBAMP to be updated based on Year 1 and Year 2 monitoring results. Monitoring program to be revised for year 3.

As part of this audit, the Auditor also reviewed the draft EMS (dated November 2024) to assess its adequacy for an operational phase of works.

When assessing the suitability of management plans, the Auditor undertook a high-level gap assessment of the EMS against the Department of Planning, Industry and Environment, *Post Approval Guidance, Environmental Management Plan Guideline* requirements (April 2020). The high-level assessment found that the current and draft EMS contained all the relevant requirements from the guideline including identification of requirements, targets, objectives and controls, roles and responsibilities, and commitments to continuous improvement (monitoring, reporting and corrective actions).

The Auditor tested implementation of the EMS and management plans via review of documentation, interviews and via the site inspection, with no major issues raised or non-compliances identified.

In general, the Auditor considers that the EMS and management plans have been prepared to an appropriate standard and capture the requirements of the planning approval and best practice principles. It is acknowledged that management plans are in the process of being updated to reflect the operational status of the project.

4.9 Audit Site Inspection

A site inspection was undertaken on 14 August 2025, starting at approximately 9am. At the time of the inspection weather conditions were mild and sunny. The objective of the site inspection was to review the effectiveness of the environmental mitigation measures implemented at the Site and to assess environmental performance generally.

The BWF Environmental Advisor and Operations Manager accompanied the Auditor during the site inspection and were interviewed during the process. Areas inspected included:

- Main site entrance on Lachlan Valley Way.
- Operations and maintenance (O&M) compound including storage shed and adjacent lay down areas.
- Representative WTGs.
- Biodiversity stewardship area (Golden Hollows).
- · Heritage no-go zones.



- Internal access roads.
- Former disturbed surfaces subject to rehabilitation.

All areas were made accessible to the Auditor upon request.

One (1) finding was identified raised by the Auditor during the inspection:

• An external waste oil storage area was observed, 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. An opportunity for improvement was raised in relation to this finding, with recommendations provided to rectify the management of oil waste drums as soon as possible. Refer to finding **BWF-03_OFI-1** against CoA 3-16 (Photos 5 and 6)

The following observations were made:

- Main site entrance was clearly identified with project information displayed and was equipped with a castle grid, doubling as a rumble grid to mitigate mud tracking. No tracking was observed on Lachlan Valley Way (Photos 1 and 2).
- Environmental policy, permits and management plans displayed in O&M compound (Photo 4).
- Dedicated oil storage shed was self-bunded, however had limited capacity to store additional materials (Photo 7).
- Waste segregation with dedicated bins (Photo 9).
- Internal access road in good condition with negligible erosion noted (Photo 10, 11, 16 and 17).
- Evidence of pest control (rodent traps) around O&M compound.
- Erosion and sediment (ERSED) controls employed and included rock-lined swale drains and culverts, rock dams (Photo 16, 17 and 18).
- Progressive rehabilitation of previously disturbed surfaces was observed (Photo 10 and 11)
- Signage was installed at heritage no-go zones (Photo 12).
- Evidence of management action requirements including manual removal of sifton bush and feral animal trapping was observed at Golden Hollows biodiversity stewardship area (Photo 14 and 15).
- No mud tracking on public roads

Refer to Appendix D for additional photographs taken during the site inspection.



4.10 Actual versus Predicted Environmental Impacts

The Auditor has undertaken a qualitative assessment of the predicted impacts associated with the Project, as described within the following documentation, against the actual impacts observed during the audit process:

- Bango Wind Farm, Environmental Assessment, Volume 1, September 2016 (EIS);
- Bango Wind Farm, Response to Submissions, May 2017 (RtS);
- Bango Wind Farm, Revised Environmental Noise Assessment, May 2019

Chapters 8 to 19 of the EIS contain a summarised assessment of the predicted impacts of each environmental aspects identified in the Department of Planning and Environment (DPE) Secretary's Environmental Assessment Requirements (SEARs). The EIS is supported by several technical assessments, included as an appendix. The summarised assessments within the EIS were used by the Auditor as a comparison against actual impacts.

When assessing actual impacts the following factors were considered:

- The occurrence of environmental incidents.
- Compliance history against the conditions of consent and adherence to the approved management plan requirements.
- Results of environmental monitoring data compared to predicted levels.
- Number and frequency of internal actions raised during site inspections.
- The nature and frequency of complaints.
- Regulatory notices and actions.
- The physical extent of the Project's operations compared to the approved boundaries.
- Consistency of designs with the EIS.
- Any planning approval modifications or consistency assessments.
- Appropriate implementation of environmental mitigation measures.

It is beyond the scope of this IEA to investigate each of the detailed studies and predictions undertaken as part of the EIS to make comparisons against actual measurements. As such, a qualitative assessment of key aspects has been undertaken, in respect to the current operational status of the project.

Landscape and visual

The EIS initially anticipated 122 WTGs, however the approved project included a reduction to 46 WTGs. The EIS also considered up to six (6) wind monitoring masts, however only two (2) were constructed. The height of the WTGs is consistent with approved limits (<200 m). The final layout plan was approved by DPHI in 2020 and is generally consistent with the WTGs presented in the plan presented Appendix 2 of the planning approval (dated May 2019).





The Landscape and Visual Impact Assessment (LVIA) included within the EIS identified ten (10) high, five (5) medium to high, and seven (7) medium visual impacts to residences. Some of these residences were 'associated' residences meaning that they were subject to some form of compensation for their impacts.

There have been requests made for visual impact mitigation from non-associated owners. The 5-year timeframe to request visual impact mitigation in accordance with CoA 3-1 ended in 16 August 2024. Refer to CoA 3-1 in Appendix A for details of visual impact mitigation works completed within the audit period. Assessment of the impact of the visual impact mitigation was reported as positive from third party consultants.

Noise

An operational noise compliance assessment was completed in June 2024 by acoustic consultant Sonus, including noise monitoring at residential receiver locations. The Sonus report concluded that operational noise from the Wind Farm meets the Noise Criteria specified by the Project Approval Conditions when assessed in accordance with the NCTP. Based on the assessment, the noise from the WTGs is compliant with the Project Approval Conditions.

There have been several noise related complaints received during the audit period, however these complaints have generally been closed when noise impacts were deemed to be compliant based on the operational noise compliance testing report. Refer to CoA 3-10 in Appendix A for further details.

Biodiversity

The project was approved to reduce up to 84.2 hectares (ha) of box gum woodland, an endangered ecological community (EEC). However, final reconciled disturbance limits provided by the Engineering, Procurement and Construction (EPC) contractor confirmed that only 16.54 ha was cleared. The project has offset its biodiversity impacts via securing a biodiversity stewardship area known as 'golden hollows' which is managed in accordance with a Biodiversity Stewardship Agreement, that includes management requirements to restore and improve the biodiversity value of the site. Other offset credits were retired via direct payment to the NSW Biodiversity Conservation Fund

The Auditor noted that passive rehabilitation was occurring to previously disturbed areas via monitoring and controlling erosion and in some instances via fencing off rehabilitation areas to reduce livestock grazing.

The EIS described the risk to avifauna during the operational phase and acknowledged that birds and bats were at risk of collision with WTGs, however estimations of rates of mortalities were not included. The EIS stated that "based on the findings of past studies, it is likely that some collisions will be unavoidable even with appropriate mitigation measures". The EIS identified several threatened bird species within the study area. However, it is acknowledged that some of the threatened species that have been impacted by BWF, were not identified in the EIS (e.g., the white-throated needletail is a threated species that was not identified in the EIS).

There were four (4) BBAMP trigger events during the audit period, including two (2) threatened and two (2) non-threatened species. Given that there was no prediction of numbers of impacts provide in





the EIS it is difficult to compare actual vs predicted impacts. A range of responses have been considered on response to the trigger events, including increased rates of monitoring and assessment of habitat locations. The BBAMP annual compliance report will detail these events, including responses, which will be provided to CHPR for comment.

General

The Auditor noted that mitigation measures were generally being suitably implemented in accordance with approved management plans. No issues were noted that would indicate actual impacts being greater than those detailed within the EIS, however it is acknowledged that bird and bat strikes are a key area of focus for the project moving forward.

The project has been subject to one (1) planning modification since its original approval. However, this was administrative in nature and did not result in any additional environmental impacts.

Based on the assessment of the environmental impacts identified in the EIS compared to actual impacts observed during the audit, the Auditor considers that current environmental impacts would likely be considered less than or consistent with those anticipated within the EIS.

4.11 Previous Compliance Reporting Recommendations

Compliance reports are not a requirement of the SSD-6686 planning approval.

4.12 Summary of Environmental Performance

Based on the evidence provided, the observations made and compliance findings of this audit, the Project is considered to have demonstrated good environmental performance during the audit period. Three (3) non-compliances were identified, however they were administrative in nature, with no associated environmental impacts. One (1) minor issue was identified during the site inspection (waste oil storage) requiring rectification, however no evidence of spills or leaks was observed. The project transitioned from construction to operations during the audit period, which was a focus area of this audit. In general, this transition occurred without any significant issues that have been identified by the Auditor, with post-construction and pre-operations requirements generally having been satisfied. The BWF site operations and management teams were considered to demonstrate a strong awareness of their environmental obligations, including management plan requirements and relevant SSD-6686 CoAs. Three (3) recommendations have been provided for CWRF's consideration.

The following key strengths are noted:

- Document management was strong, including a compliance tracking register used to provide a comprehensive and easily accessible history of events and activities for each requirement, including key dates and documented outcomes.
- BWF was able to demonstrate a robust internal audit program, including numerous environmental audits having occurred during the audit period (including BBAMP audit, website audit, TMP audit). Audit actions are raised and tracked through an internal platform 'Archer', including close out



evidence, as required.

- The 'Golden Hollows' biodiversity stewardship area was inspected by the Auditor, with evidence
 of management actions such as manual removal of sifton bush and tracking of feral pigs able to be
 observed.
- Passive rehabilitation of disturbed surfaces is being successfully supported through consistent monitoring and maintenance of weed encroachment and erosion and sediment control (ERSED) controls.
- ERSED controls, including rock-lined roadside swale drains and rip-rap around culverts were well
 maintained. Evidence of recent ERSED maintenance was observed, with negligible erosion
 present on roadways.

The Auditor thanks the BWF team for their cooperation during the IEA process.

4.13 Audit Findings and Recommendations

Independent Audit findings were based on evidence collected during the audit process, which included:

- Relevant records, documents and reports (refer to Appendix A and Appendix H).
- Interviews of relevant site personnel (refer to Section 3.2.5 and Appendix A).
- Photographs (refer to Appendix D).
- Figures and plans (refer to Appendix A and Appendix H).
- Site inspections of relevant locations, activities and processes (refer to Section 4.9).

Three (3) non-compliances (NCs), and three (3) opportunities for improvement (OFIs) were identified during the Audit. However, one of the NCs had been self-reported and all three NC's are considered administrative in nature and not likely to result in any actual environmental impacts.

A summary of Audit Findings is provided in *Table 4.3* below.

Table 4.3: Summary of Audit Findings

Reference	Requirement Details	Finding Details	Status
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. b) Note: The general layout	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.	Closed



Reference	Requirement Details	Finding Details	Status
	of the development is shown in Appendix 2.	Recommendation: Nil	
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.	Closed
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	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.	Closed



Reference	Requirement Details	Finding Details	Status
	Department and the EPA.		
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.	Open
		Recommendation: Move all waste oil drums to bunded and covered storage locations as soon as practicable and prior to rainfall.	
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 clearance amounts and demonstrate ongoing compliance during operations.	Open
Opportunity for Improvement BWF-03_OFI-3	4-1 ENVIRONMENTAL MANAGEMENT Environmental Management Strategy	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	Open



Reference	Requirement Details	Finding Details	Status
	Following approval, the Applicant shall implement the Environmental Management Strategy.	specific training in relation to their responsibilities regarding monitoring and reporting of bird and bat strikes.	
	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."	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.	



Appendix A - Audit Compliance Table



Appendix A – Audit Compliance Table

Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
Schedule	chedule 2: Administrative Conditions					
2-1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT In addition to meeting the specific environmental performance criteria established under this consent, the Applicant shall 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 development.	Environmental mitigation measures are implemented in accordance with EMS and specific management plans. The Auditor did not identify actual or potential risk of material harm to the environment.		Compliant		
2-2	TERMS OF CONSENT The Applicant shall carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent. Note: The general layout of the development is shown in Appendix 2.	Bango Wind Farm, Environmental Impact Statement, Volume 1, dated September 2016 (EIS) Letter from CWP to DPHI Re: Section 4.55 Modification request (Modification report) SSD-6686 The Auditor considers that the BWF development has generally been carried out in accordance with the abovelisted documentation.	Non-compliance BWF-03_NC-1 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. Auditor considers that both non-compliances were appropriately resolved within the audit period and there are no further corrective actions required.	Not Compliant		
2-3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	No material inconsistencies between the EIS and SSD planning approval have been identified to date.		Compliant		
2-4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in	Evidence sighted: DPHI approval letters of management plans. Correspondence between BWF and DPHI regarding recently submitted EMS. All management plans have been approved by DPHI. Correspondence was received for the EMS and incorporated into final report.		Compliant		

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	these documents.	(b) DPHI did not commission any reports, reviews or audits regarding compliance during the audit period.(c) All actions from previous IEAs have been implemented.		
2-5	LIMITS ON CONSENT Wind Turbines The Applicant may construct, operate and replace or upgrade as necessary up to 46 wind turbines.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No additional WTGs constructed within the audit period. Evidence sighted: Bango Wind Farm, Final Layout Plan, dated 16 July 2020.		Compliant
2-6	This consent does not authorise the development of wind turbines numbers 17,19, 21,25, 26, 28, 36, 45, 48, 53, 55, 59, 62, 65, 69, 71, 72, 79, 81, 83, 86, 91, 95,102, 111 and 119 Notes: To identify the wind turbines see the figures and corresponding GPS coordinates (for those wind turbines approved in Appendix 2 To avoid any doubt, the Applicant does not require additional approval to replace or upgrade wind turbines overtime, as long as the replacement or upgrade is carried out in accordance with the conditions of this consent.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No additional WTGs constructed within the audit period. Evidence sighted: Bango Wind Farm, Final Layout Plan, dated 16 July 2020. WTGs specified in CoA 2-6 not identified on Final Layout Plan.		Compliant
2-7	No wind turbines may be located within 100 metres of the site boundary, unless otherwise agreed by the adjoining landowner.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No change in WTG locations during the audit period.		Compliant
2-8	Wind Turbine Height No wind turbines may be greater than 200 metres in height (measured from above ground level to the blade tip).	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No additional WTGs constructed during the audit period.		Compliant
2-9	Micro-siting Restrictions The Applicant may micro-site the wind turbines and ancillary infrastructure without further approval provided: (a) they remain within the development corridor shown on the figure in Appendix 2; (b) no wind turbine is moved more than 100 metres from the location shown on the figures in Appendix 2;	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No change in WTG locations during the audit period.		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	 (c) wind turbines numbers 76 and 98 are not moved any closer to residence 282, unless it ceases to be a non-associated residence; (d) wind turbine numbers 25, 62 and 111 in Layout Option 1 are not moved any closer to residences 60, 144 and 238; (e) the revised location of the wind turbines listed in Appendix 3 are not any closer to the corresponding Wedge-tailed eagle (Aquila audax) nest; and (f) the revised location of the wind turbine and/or ancillary infrastructure would not result in any non-compliance with the conditions of this consent. 			
2-10	Staging of the Development The Applicant may construct, operate and decommission the development in stages. Where staging of the development is proposed, the conditions of this consent are only required to be compiled with at the relevant time and to the extent that they are relevant to the specific stage(s).	No staging conducted in any phases.		Not triggered
2-11	Final Layout Plans Prior to the commencement of construction, the Applicant shall submit detailed plans of the final layout of the development to the Secretary, including: (a) details on the micro-siting of any wind turbines and/or ancillary infrastructure; and (b) the GIS coordinates of the wind turbines. Following approval, the Applicant must ensure that the development is constructed in accordance with the final layout plans.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No change in WTG locations during the audit period. Evidence sighted: Bango Wind Farm, Final Layout Plan, dated 16 July 2020. DPHI approval of Final Layout Plans, dated 15 August 2020 Final layout plans were used for construction.		Compliant
2-12	the Applicant may revise the approved final layout plans. Prior to carrying out any such revisions, the Applicant must submit the plans to the Secretary for approval.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No change in WTG locations during the audit period. Evidence sighted:		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Following approval, the Applicant must ensure that the development is constructed in accordance with the revised layout plans.	 Bango Wind Farm, Final Layout Plan, dated 16 July 2020. 		
		DPHI approval of Final Layout Plans, dated 15 August 2020		
		Final layout plans were used for construction.		
2-13	NOTIFICATION	Evidence sighted:	DPHI Focus Area	Compliant
	Prior to the commencement of the construction, operation and/or decommissioning of the development or the cessation of operations, the Applicant must notify both the Department and the Councils in writing of the date of commencement or cessation.	 Letter from Squadron Energy to DPHI, Re. Bango Wind Farm – SSD-6686 – Notice of commencement date of operation, dated 14 December 2023 	DPHI and Councils were appropriately notified of an expected commencement date of operations, which was then	
	If the construction, operation and/or decommissioning of the development is to be staged, then the Applicant must:	 Letter from Squadron Energy to DPHI, Re. Bango Wind Farm – SSD-6686 – Confirmation of the commencement date of operation, dated 21 December 	reconfirmed once operations formally commenced.	
	(a) notify both the Department and the Councils in writing prior	2023		
	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	 DPHI correspondence Re. Notification of commencement of operations 14-23 December 2023, dated 19 December 2023. Ref: SSD-6686-PA-52 		
(b) inform the local community and the Co Consultation Committee about the proposed stagi	Consultation Committee about the proposed staging plans	 Email correspondence from BWF to Yass Valley Council and Hilltops Council Re. Final notification of commencement of operations, dated 20 December 2023. 		
		 Letters from BWF to Yass Valley and Hilltops Councils Re. notification of commencement of operations, dated 14 December 2023. 		
	cc 2 th ai	 Letters from BWF to Yass Valley and Hilltops Councils Re. notification of commencement of operations, dated 21 December 2023. 		
		In June 2023 BWF notified DPHI of planned commencement of operations expected between 8-15 July 2023. On 14 December 2023 BWF notified DPHI advising that operations were expected to commence between 14 and 23 December 2023. On 21 December 2023 BWF notified DPHI that operations officially commenced on the 14 December 2023.		



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		The letters from BWF to Yass Valley and Hilltops Councils, dated 14 December indicated operations were expected to commence on 14-23 December 2023. Subsequent letters dated 21 December 2024 indicated that operations actually commenced on 14 December 2023.		
2-14	STRUCTURAL ADEQUACY The Applicant must ensure that: (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 (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 SCA. Notes: • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	 Evidence sighted: Final Occupation Certificate No. 134.14/2020, prepared by Pro Cert Group Pty Ltd, dated 7 December 2023. Type Certificate Registration No. 44 220 19288026-TC-IEC-a, Rev. 3 The Type Certificate was for wind turbine GE5.x-158 and GE4.x-158. The Type Certificate included normative references including: IEC 61400-1 "Wind Turbines - Part 1: Design requirements", Third Edition, 2005-08 and Amendment 1, 2010-10 The occupation certificate stated that "the design and construction of the Bango Wind Farm is considered to be not inconsistent with the development Consent SSD 6686 – Mod 1". All Construction Certificates and Interim Occupation Certificates were issued prior to the Audit Period and are outside the scope of this audit. 		Compliant
2-15	DEMOLITION The Applicant shall ensure that all demolition work on site is carried out in accordance with <i>AS 2601-2001: The Demolition of Structures,</i> or its latest version.	No demolition works have occurred to date.		Not triggered.
2-16	PROTECTION OF PUBLIC INFRASTRUCTURE Unless the Applicant and the applicable authority agree otherwise, the Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result	Site inspections and audit interviews confirmed that no damage to public infrastructure has occurred during the audit period.		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.			
2-17	OPERATION OF PLANT AND EQUIPMENT The Applicant shall ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	 Evidence sighted: 3D safety entry for 400 tonne crane. Serial number 64002126. Lifespan WTG maintenance register Evidence of works being completed in in 'field service' application including time stamped photographs. GE training matrix, sub-contractor register Individual qualifications and competencies are stored on shared folders. 6 monthly and annual maintenance is undertaken of on each WTG. Both GE and subcontractor undertake maintenance The 3D safety entry included details of a plant risk assessment, service history, CraneSafe assessment and inspection forms. 		Compliant
2-18	UPDATING & STAGING OF STRATEGIES, PLANS OR PROGRAMS With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. Notes: While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development	 The following management plans had been updated during the audit period. Bango Wind Farm, Environmental Management Strategy, Rev 3, dated 22 December 2022. Bango Wind Farm, Heritage Management Plan, Rev 004, dated 15 April 2025. Evidence sighted: DPHI Approval Letter of Environmental Management Strategy, dated 20 January 2023. Ref: SSD-PA-34. DPHI Approval Letter of Heritage Management Plan, dated 6 June 2025. Ref: SSD-PA-62. Project management plans are currently in the process of being updated for Operations. Status of each plan includes: 		Compliant



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	 being carried out on site is covered by suitable strategies, plans or programs at all times. 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. 	 EMS has been submitted to DPHI who have provided initial responses. TMP has been submitted to TfNSW and Councils for comment. Awaiting responses. BMP has been submitted to CHPR. BWF currently responding to comments regarding rehabilitation HMP updated for operations and approved by DPHI 6 June 2025. BBAMP to be updated based on Year 1 and Year 2 monitoring results. Monitoring program to be revised for year 3. 		
2-19	COMMUNITY ENHANCEMENT Prior to the commencement of construction, unless the Secretary agrees otherwise, the Applicant shall enter into VPAs with the Councils in accordance with: (a) Division 7.1 of Part 7 of the EP&A Act; and (b) the terms of the applicable offer in Appendix 4.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No changes during the audit period.		Compliant
2-20	SUBDIVISION The Applicant may subdivide the land comprising the site for the purposes of carrying out the development, in the following manner: (a) to create a separate freehold title for the purposes of the collector substation from one of the options identified in APPENDIX 9; and (b) to enable registration of long term leases of part of land on any title of the land comprising the site by: i. registration of plans of subdivision for lease purposes; or ii. such other manner as may be required under the Conveyancing Act 1919 (NSW) or the NSW Land Registry Services (or its successor), as shown by the lease areas contained in APPENDIX 10, in accordance with the EIS and the requirements of the EP&A Act, EP&A Regulation,	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. A subdivision was registered in 2021 to allow for a separate freehold title for the electrical substation as per Appendix 9 of the consent. There have been no additional subdivisions since. In January 2024 an easement was created, however this is not considered subdivision. Evidence sighted: Land Registry Services, Land Title 2/1187122, dated 21 January 2024 showing transfer granting easement. Email correspondence from Squadron legal advisor		Compliant

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	Conveyancing Act 1919 (NSW) and the NSW Land Registry Services (or its successor).			
2-21	For the avoidance of doubt, other than as permitted by condition 20(a) of Schedule 2, this consent does not permit the creation of new individual freehold titles as a result of the subdivision of existing freehold titles.	As per CoA 2-20		Compliant
2-22	Any subdivision certificate issued in relation to a plan of subdivision (or other plan prescribed or required by the NSW Land Registry Services or its successor) registered in accordance with condition 20(b) of Schedule 2 must contain a statement that the subdivision is only for the purposes of registering leases as set out in condition 20(b) of Schedule 2.	As per CoA 2-20		Compliant
2-23	The consent for subdivision for lease purposes under condition 20(b) of Schedule 2 expires on the date the Secretary is satisfied that the site has been rehabilitated in accordance with condition 35 of Schedule 3.	As per CoA 2-20		Not triggered
Schedule	3: Environmental Conditions - General			
3-1	VISUAL	Evidence sighted:		Compliant
	Visual Impact Mitigation For a period of 5 years from the commencement of construction, the owner of any non-associated residence within 4 km of any wind turbine may ask the Applicant to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Applicant must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence. All mitigation measures must be implemented within 12 months of receiving the written request, unless the Secretary agrees otherwise.	 Bango Wind Farm Visual Impact Assessment Report, Dwelling Address: 1586 Laverstock Rd, Laverstock, prepared by Moir Landscape Architecture, dated 21 February 2023. Bango Wind Farm Screening Assessment 24 Month Final, prepared by EcoLogical, dated 12 August 2025. 1586 Laverstock Rd, Laverstock is located within 4km of a WTG. A request for visual impact mitigation was received from the owners of this property on 29 June 2022. The Visual Impact Assessment Report identified seven (7) WTGs that were potentially visible from the residence. It was recommended to implement 685m² of landscape screening to mitigate the visual impacts using native low bushfire risk plant species. The Eco Logical report stated that planting occurred in April 23 and included 14 trees. The report stated that most of the planting were successful however the landowner had cut 5 		



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
0.0	If the Applicant 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. Notes: To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage.	trees. Only (1) tree was in poor health. The overall performance was positive. The 5 year timeframe to request visual impact mitigation ended in 16 August 2024.		
3-2	Visual Appearance The Applicant must: (a) (a) minimise the off-site visual impacts of the development; (b) ensure the wind turbines are: i painted off white/grey, unless otherwise agreed by the Secretary; and ii finished with a surface treatment that minimises the potential for glare and reflection; (c) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; (d) implement vegetation screening comprised of suitable native species around substations and control buildings where they are visible from neighbouring non-associated residences and public viewpoints; and (e) not mount any advertising signs or logos on wind turbines or ancillary infrastructure.	 (a) Refer to CoA 3-1 for details of visual impact mitigation work undertaken during the audit period. (b) During the site inspection all WTGs appeared to be painted white/ grey and ancillary infrastructure were not visible to surrounding residents. (c) No advertising signs or logos were mounted to WTGs or ancillary infrastructure. 		Compliant
3-3	Lighting The Applicant must: (a) minimise the off-site lighting impacts of the development; (b) ensure that any aviation hazard lighting complies with CASA's requirements; (c) ensure that all external lighting associated with the development (apart from any aviation hazard lighting): I. is installed as low intensity lighting (except where	Evidence sighted: Letter from CASA to CWP Renewables – Bango Wind Farm – Request for CASA Review, dated 23 May 2019. CASA reviewed the final WTF layout plan and recommended 200 candela low intensity steady red night lighting. BWF Letter to DPHI – Bango Wind Farm SSD 6686 – Aviation Lights – DPE Request for Information, dated 6 September 2023	DPHI Focus Area Non-compliance BWF-03_NC-2 Due to a power outage associated with the Transgrid substation on 8 May 2023, the WTG aviation lighting temporarily failed to operate	Not Compliant

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Condition Compliance Rel	quirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
II. III. IV.	required for safety or emergency purposes); does not shine above the horizontal; uses best management practice for bat deterrence; and complies with Australian Standard AS 4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	DPHI Warning Letter – Breach of Section Insert of the Environmental Planning and Assessment Act 1979, dated 9 September 2023. Ref: ENF-63079712. WTG lighting had been approved by CASE in 2019. Non-aviation lighting was noted as being installed in accordance with relevant standards as per Occupation Certificate. No complaints received in relation to non-aviation lighting.	while the cause of the power outage was being investigated. Upon reenergisation, several WTG lights were either not operating or 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, who 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 noncompliance within this audit report.	



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			Recommendation: Nil. It is understood that measures have been implemented to rectify the lighting issue.	
3-4	Shadow Flicker The Applicant must ensure that shadow flicker from operational wind turbines does not exceed 30 hours per annum at any non-associated residence.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No change in WTG locations during the audit period.		Compliant
3-5	NOISE Construction & Decommissioning The Applicant must: (a) minimise the construction or decommissioning noise of the development, including any associated traffic noise. (b) ensure that 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	Section Completion Certificate, Section 5, Bango Wind Farm Engineer, Procure, Construct Contract (EPC Contract), dated 7 August 2019 Section certificate concluded that final completion was on 8 May 2023. Last turbine was constructed in May 2023. Following that the 'construction activities' included testing and commissioning which did not require noise mitigations. During construction the EPC contractor managed noise in accordance with the Noise and Vibration Management Plan.		Compliant
3-6	Unless the Secretary agrees otherwise, the Applicant 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 activities may be undertaken outside these hours without the approval of the Secretary: • activities that are inaudible at non-associated residences; • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or emergency work to avoid the loss of life, property and/or material harm to the environment.	The last out of hours works on the project was on 31 May 2022. There were no out of hours works undertaken within the Audit Period.		Compliant



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3-7	Blasting The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Friday and between 8 am and 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.	No blasting occurred during audit period		Compliant
3-8	The Applicant shall ensure that any blasting carried out during the construction of the development does not exceed the criteria in Table 1. Table 1: Blasting criteria (see consent document for criteria)	No blasting occurred during audit period		Compliant
3-9	Operational Noise Criteria – Wind Turbines The Applicant shall ensure that the noise generated by the operation of wind turbines does not exceed the relevant criteria in Table 2 at any non-associated residence. Table 2: Noise criteria dB(A) (see consent document for criteria) Note: To identify the residences referred to in Table 2 see the applicable figures in Appendix 2. Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version), and the provisions in Appendix 5. However, these criteria do not apply if the Applicant has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.	 Evidence sighted: Bango Wind Farm, Noise Compliance Testing, dated June 2024, prepared by Sonus. The Sonus report concluded that operational noise from the Wind Farm meets the Noise Criteria specified by the Project Approval Conditions when assessed in accordance with the NCTP. Based on the assessment, the noise from the WTGs is compliant with the Project Approval Conditions. DPHI Letter to BWF, dated 26 June 2024. Operational Noise Compliance Report. Ref: SSD-6686-PA-54. The DPHI letter stated that the "Operational Noise Monitoring Report generally satisfies Condition 11 of the consent". Email from BWF to EPA - BWF Noise Monitoring Report Post-Construction March 2024, dated 20 March 2024. The email from BWF to EPA referenced condition L3 of t EPL 21286, which required to provision of an operational noise compliance report. 	Operational noise has been confirmed to meet the project's approval criteria. There have been several noise related complaints received during the audit period, however these complaints have generally been closed when noise impacts were deemed to be compliant based on the operational noise compliance testing report.	Compliant
3-10	Operational Noise Criteria – Ancillary Infrastructure The Applicant 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.	Evidence sighted: Bango Wind Farm, Noise Compliance Testing, dated June 2024 2022, prepared by Sonus. The Sonus report concluded that operational noise from the Wind Farm meets the Noise Criteria specified by the Project Approval Conditions when assessed in accordance with the		Compliant

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	Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (or its equivalent) as modified by the provisions in Appendix 5.	 NCTP. Based on the assessment, the noise from the WTGs is compliant with the Project Approval Conditions. DPHI Letter to BWF, dated 26 June 2024. Operational Noise Compliance Report. Ref: SSD-6686-PA-54. The DPHI letter stated that the "Operational Noise Monitoring Report generally satisfies Condition 11 of the consent". Email from BWF to EPA - BWF Noise Monitoring Report Post-Construction March 2024, dated 20 March 2024. The email from BWF to EPA referenced condition L3 of t EPL 21286, which required to provision of an operational noise compliance report. 		
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: (a) undertake noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and (b) submit a copy of the monitoring results to the Department and the EPA.	 Evidence sighted: Bango Wind Farm, Noise Compliance Testing, dated June 2024 2022, prepared by Sonus. The Sonus report concluded that operational noise from the Wind Farm meets the Noise Criteria specified by the Project Approval Conditions when assessed in accordance with the NCTP. Based on the assessment, the noise from the WTGs is compliant with the Project Approval Conditions. DPHI Letter to BWF, dated 26 June 2024. Operational Noise Compliance Report. Ref: SSD-6686-PA-54. The DPHI letter stated that the "Operational Noise Monitoring Report generally satisfies Condition 11 of the consent". Email from BWF to EPA - BWF Noise Monitoring Report Post-Construction March 2024, dated 20 March 2024. The email from BWF to EPA referenced condition L3 of t EPL 21286, which required to provision of an operational noise compliance report. 	Non-compliance BWF-03_NC-3 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 noncompliance 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.	Non-compliant
			Recommendation: Nil.	



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3-12	The Applicant shall undertake further noise monitoring of the development if required by the Secretary.	Not triggered		Not triggered
3-13	AIR The Applicant must: (a) minimise the off-site dust and fume emissions of the development; and (b) minimise the surface disturbance of the site.	 Evidence sighted: Appendix C1 of the EMS contains air quality mitigation measures Monthly Environmental Site Inspection Forms Assessment of air quality and rehabilitation areas is included in monthly inspections. Traffic speeds are kept below 40km to help reduce dust. All internal access roads were covered with road base and gravel. Unsealed areas being progressively rehabilitated, where possible. No dust or air quality issues observed. 		Compliant
3-14	SOIL & WATER Water Supply The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.	Operational water was trucked in via tanker in latter parts of construction. Onsite damns were also used. Rainwater and tanks on roof of O&M compound. Water carts used as required. No Water Licences required.		Compliant
3-15	Water Pollution Unless an EPL authorises otherwise, the Applicant must comply with Section 120 of the POEO Act. Note: Section 120 of the POEO Act makes it an offence to pollute any waters	 Evidence sighted: EPL 21286 NSW EPA Annual Statement of Compliance for Licence 21286– 2022, 2023 and 2024 Monthly site inspection checklists BWF currently holds EPL 21286. Condition L1 of the EPL requires BWF to comply with Section 120 of the POEO Act. The EPA annual returns did not identify any pollution events. No water pollution incidents have been recorded or reported to the EPA or DPHI. 		Compliant

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Condition Compli	liance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		No active discharging occurring on site. On site visual monitoring undertaken by Ops team.		
		Sediment basin located at O&M building and substation. No spills recorded during audit period.		
The App	and decommissioning of the development by implementing the relevant mitigation measures in <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version; ensure all waterway crossings are constructed in accordance with the: i. <i>Water Guidelines for Controlled Activities on Waterfront Land (2012)</i> , or its latest version; ii. <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004)</i> , or its latest version; store and handle all dangerous or hazardous materials on site in accordance <i>AS1940-2004: The storage and handling of flammable and combustible liquids</i> , or its latest version. ensure the concrete batching plants and substation are suitably bunded; and	Site observations confirmed acceptable ERSED controls being implemented (a) Appendix C6 of EMS requires monthly monitoring of the effectiveness of ERSED controls (b) Construction activities managed in accordance with EPC Contractor's Construction Environmental Management Plan (CEMP) – no current construction activities being undertaken (c) One (1) waterway crossing was construction prior to the audit period. The Auditor noted large culverts and rock armouring utilised. (d) An opportunity for improvement has been raised in relation to the appropriate storage of oil and waste oil drums on site, in general accordance with AS1940-2004. (e) No concrete batching occurring on site. (f) No hydrocarbon spills recorded during audit period. Spill kits were observed in chemical storage areas.	Opportunity for Improvement BWF-03_OFI-1 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	Compliant



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			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.	
3-17	BIODIVERSITY	Evidence sighted:	Opportunity for Improvement	Compliant
	Restrictions on Clearing and Habitat The Applicant must:	Disturbance registers from EPC Contractor, dated until September 2020.	BWF-03_OFI-2 Final clearance limits were	
	 (a) ensure that no more than 103.75 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 shapefile and attributes table. Bango Wind Farm, Biodiversity Management Plan, Rev 3. dated December 2020. 	provided by the EPC Contractor following construction in GIS shapefile and a MS Excel tracker,	
	(b) undertake the removal of the 1JIJedge tailed eagle (Aquila audax) nest located in proximity to Turbine No.81 in layout Option 1 outside the Wedge tailed eagle breeding season (April to September);	 (a) Final actual Box Gum Woodland clearance was 16.75 ha (b) No known impacts to known locations of Yass Daisy 	demonstrating compliance with the approved clearance limits. The number of biodiversity credits that were	
	(c) avoid impacts to the known locations of Yass Daisy (Ammobium craspodioides); and	(c) Biodiversity mitigation measures are included in Section 4 of the BMP.	retired were based on these actual final clearance limits. While additional clearing is	
	(d) implement reasonable and feasible measures to minimise:	Goodon For the Bivin .	not expected to be required	
	 i. the impacts of the development on hollow-bearing trees; limb-lopping of hollow bearing trees along Aarons Pass Road; ii. the impacts of the development on threatened bird and bat populations; and iii. the clearing of native vegetation and key habitat within the approved disturbance footprint. 		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	

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			current total clearance amounts and demonstrate ongoing compliance during operations.	
3-18	Biodiversity Offset Prior to the commencement of construction, unless the Secretary agrees otherwise, the Applicant must: (a) update the baseline mapping of the vegetation and key habitat within the final disturbance area; and (b) calculate the biodiversity offset credit liabilities for the development in accordance with the Framework for Biodiversity Assessment under the NSW Biodiversity Offset Policy for Major Projects, in consultation with OEH, and to the satisfaction of the Secretary	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022.		Compliant
3-19	Within two years of the commencement of construction, unless the Secretary agrees otherwise, the Applicant must retire the required biodiversity credits, to the satisfaction of OEH. The retirement of the credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects, and can be achieved by: (a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been established by the NSW Government; or (c) providing suitable supplementary measures. Note: Following repeal of the TSC Act on 25 August 2017, credits created under that Act are taken to be 'biodiversity credits' under the Biodiversity Conservation Act 2016, in accordance with clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.	 Evidence sighed: DPHI Letter to BWF - Bango Wind Farm - Extension of Time to Retire Biodiversity Credits, dated 3 November 2011. Bango Wind Farm - SSD-6686 - Biodiversity Offset Credit Retirement Report, dated 8 February 2023. DPHI Letter to BWF - Bango Wind: Biodiversity Credit Retirement Summary, dated 29 May 2023. Ref: SSD-6686-PA-48. DPHI approved an extension of time to retire biodiversity offset credits to 28 February 2023. The Credit Retirement Report was addressed to DPHI and confirmed that CoAs 3-18 and 3-19 had been complied with. Offsets were retired via the following mechanisms: Acquiring and retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; and Making payments into the Biodiversity Conservation Fund (BCF), established by the NSW Government 		Compliant



Condition Compliance Requirement ¹ / Conditions of Approval D.	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	The DPHI letter, dated 29 May 2023 confirmed that credits were calculated and retired appropriately to the satisfaction of BCS (CHPR) and DPHI)		
Biodiversity Management Plan Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with OEH; and (b) include a: • a description of the measures that would be implemented for: • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat, including tree hollows; • minimising the impacts on fauna on site, including undertaking pre-clearance surveys; • minimising the potential indirect impacts on threatened and migratory species, including: • flora species, including the Yass Daisy (Ammobium craspodioides); and • fauna species, including the Golden Sun Moth (Synemon plana), Brown Tree-creeper (Climacteris picumnus victoriae), Diamond Firetail (Stagonopleura guttata), Grey-crowned Babbler (Pomatostomus temporalis temporalis), Scarlet Robin (Petroica boodang), Speckled Warbler (Chthonicola sagiitata), Sopted Harrier (Circus assimilis), Squaretailed Kite (Lophoictinia isura), Superb Parrot (Polytelis swainsonii), Varied Sitella (Daphoenositta)	 Evidence sighted: Bango Wind Farm, Biodiversity Management Plan, Rev 3, dated December 2020. DPHI Approval Letter, Biodiversity Management Plan, dated 11 December 2020. Evidence of implementation of BMP included: Pests are monitored during monthly operational inspections. Rodent traps were utilsied around the O&M compound. Vegetation zones are mapped using QGIS. Hollow bearing trees are mapped. Golden Hollows is managed in accordance with biodiversity stewardship agreement. The Auditor observed evidence of management actions including manual removal of sifton bush and trapping of feral pigs. A third party contractor 'Fest Pest Control' are engaged for weed and feral pest control. Passive rehabilitation promoted via maintenance of ERSED controls and fencing to restrict sheep grazing. Some batters are fenced off to allow for rehabilitation At the time of the audit the BMP was in the process of being updated to reflect the operational status of the project. Comments had been received from CHPR and BWS were in the process of procuring a consultant to produce a 'final rehabilitation' report, to update the status of rehabilitation at the site following the EPC Contractor departing. 		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	chrysoptera), Squirrel Glider (Petaurus norfolcensis), Eastern Bentwing Bat (Miniopterus schreibersii oceanensis) and Yellow-bellied Sheathtail Bat (Saccolaimus flaviventris); rehabilitating and revegetating temporary disturbance areas; protecting native vegetation and key fauna habitat outside the approved disturbance area; maximising the salvage of resources within the approved disturbance area - including vegetative and soil resources - for beneficial			
	reuse (including fauna habitat enhancement) during the rehabilitation and revegetation of the site; collecting and propagating seed (where relevant);			
	 controlling weeds and feral pests; 			
	 controlling erosion; and 			
	bushfire management;			
	 a detailed program to monitor and report on the effectiveness of these measures 			
	Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.			
3-21	Bird and Bat Adaptive Management Plan	Evidence sighted:	DPHI Focus Area	Compliant
	Prior to the commissioning of any wind turbines, the Applicant must prepare a Bird and Bat Adaptive Management Plan for the development in consultation with OEH, and to the satisfaction of the Secretary. This plan must include: (a) at least 12 months' worth of baseline data on threatened	Bango Wind Farm, Bird and Bat Adaptive Management Plan, dated December 2021 Monthly BBAMP inspection reports undertaken by Nature Advisory (included increased monitoring	Since commencement of operations there have been four (4) trigger events, as defined within the BBAMP. Two (2) related to threatened species	
	and 'at risk' bird and bat species and populations in the locality that could be affected by the development;	required in response to trigger events) Four (4) BBAMP trigger events occurred within the audit	and two (2) related to a non- threatened species.	
	(b) a detailed description of the measures that would be implemented on site for minimising bird and bat strike	period Trigger event evidence reviewed includes:	As part of this audit the Auditor has reviewed a range of documentation to test the	

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Condition Compliance Requirement ¹ / Conditions of Approva	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
during operation of the development, included - minimising the avail perches on wind tur - prompt carcass rem - controlling pests; an - using best practice of deterrence, included potential lighting important of the project on particular bird or populations; (d) an adaptive management program the implemented if the development is having impact on a particular threatened or 'at risk' species or populations; including the important measures to: - reduce the mortant species or populations - enhance and professions - any bird and bat strikes (f) provisions for a copy of all raw data collected monitoring program to be submitted to Secretary. Following the Secretary's approval, the Applicant must bird and Bat Adaptive Management Plan.	threatened Species) • Email from BWF to DCCEEW – Notification of Three Non-threatened Species Triggers, dated 13 February 2024 • Evidence of post approval submission to DPHI, notification of WSFB trigger, dated 12 March 2024 • Evidence of post approval submission to DPHI, notification of WSFB trigger, dated 12 March 2024 • DPHI letter to BWF - BBAMP – White-striped Freeta Bat January 2024, dated 8 March 2024. Ref:SSD-66 PA-56 • Bango Wind Farm – White-striped free-tailed Bat Trigger Investigation report, prepared by Nature Advisory, dated March 2024 January 2024 – White-throated Needletail (Threatene Species) • Bango Wind Farm – BBAMP Implementation – Threatened Species Incident Report and Action Plant White-throated Needletail Mortality, dated 18 January 2024 • Email from BWF to DCCEEW – Notification of White throated Needletail Investigation Report, dated 15 March 2024 • DPHI letter to BWF - BBAMP – White-throated Needletail January 2024, dated 8 March 2024. Ref:SSD-6686-PA-55	events. BWF were able to demonstrate that appropriate routine and increased rates of monitoring have been undertaken, as required by the BBAMP and in response to trigger events. BWF were able to provide sufficient evidence to demonstrate that appropriate incident notification have been provided to relevant agencies including Commonwealth DCCEEW, NSW DCCEEW, CHPR and DPHI. In for Incident reporting and action plans have been provided to relevant agencies including Commonwealth DCCEEW, NSW DCCEEW, CHPR and DPHI. In for Incident reporting and action plans have been provided to relevant agencies for comment. In some instances agencies (CHPR) have provided comments that were addressed in revision of action plan reports. Annual BBAMP compliance reporting is required to be undertaken by BWF. The Auditor understands that the next annual report will make recommendation to revise the monitoring program at the project, in response to the trigger events recorded to dat.	



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		dated 26 March 2025. Letter from CHPR to RWE – Vellow-hellied Sheathtail		
		 Letter from CHPR to BWF – Yellow-bellied Sheathtail Bat trigger report – March 2025 		
		 Email from BWF to NSW DCCEEW – Notification of Yellow-bellied Sheathtail Bat Mortality, dated 26 March 2025. 		
		Email from BWF to CHPR – Response Letter Bango Wind Farm May 2025		
		Bango Wind Farm, Yellow-bellied Sheathtail Bat Impact Trigger Investigation and Actions Plan, dated April 2025		
		April 2025 – White striped freetail bat (Non-threatened Species)		
		Bango Wind Farm, Grey Fantail Impact Trigger Investigation and Actions Plan, dated May 2025.		
		DPHI letter to BWF, Bango Wind - Grey Fantail Impact Trigger Investigation and Action Plan Report, dated 17 June 2025. Ref: SSD-6686-PA-65.		
		 Email from BWF to NSW DCCEEW – Non-threatened trigger event, dated 9 May 2025. 		
3-22	HERITAGE Protection of Heritage Items	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022.		Compliant
	The Applicant must:	No heritage items were identified during the audit period.		
	(a) ensure that the development does not cause any direct or indirect impact on any Aboriginal heritage items located outside the approved disturbance area; and			
	(b) minimise any impacts on the Aboriginal heritage items identified in Table 2 in Appendix 6.			
	Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6			
3-23	Heritage Management Plan	Evidence sighted:		Compliant
		Bango Wind Farm, Heritage Management Plan, Rev 004, dated 15 April 2025.		

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Condition Complia	ance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
prepare satisfacti (a) (b) (c) (d)	the commencement of construction, the Applicant must a Heritage Management Plan or the development to the cion of the Secretary. This plan must: be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary; be prepared in consultation with OEH and Aboriginal stakeholders; include up to date baseline mapping of the heritage items within and adjoining the development disturbance area; include a description of the measures that would be implemented for: i. protecting Aboriginal heritage items identified in Table 1 in Appendix 6 and any items located outside the project disturbance area; ii. minimising and managing the impacts of the development on heritage items identified in Table 2 in APPENDIX 6; iii. a contingency plan and reporting procedure if: - Aboriginal heritage items outside the approved disturbance area are damaged; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; iv. ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and v. ongoing consultation with Aboriginal stakeholders during the implementation of the plan; a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project of approval, the Applicant must implement the measures and in the Aboriginal Heritage Management Plan.	DPHI Approval Letter of Heritage Management Plan, dated 6 June 2025. Ref: SSD-PA-62. The DPHI approval letter confirmed that the HMP had been prepared in consultation with RAPs. Had been updated with minor changes for operations, and contain information required by the CoAs. The heritage no-go zone was observed during the inspection with signage installed.		



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3-24	TRANSPORT Designated Heavy and Over-Dimensional Vehicle Routes The Applicant must ensure that all over-dimensional and heavy vehicle access to and from the site is via the Hume Highway and Lachlan Valley Way, as identified in the figures in Appendix 8, unless the Secretary agrees otherwise. Notes: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.	NHVR, Oversize and/or Overmass (OSOM) or Dimension Extension Permit, issued to Rex J. Andrews Pty Ltd from 25 October 2024 to 23 January 2025 The OSOM included details of Authorised Routes, which align to those contained within the planning consent.		Compliant
3-25	Road Upgrades The Applicant must implement the road upgrades identified in APPENDIX 7 in accordance with the relevant timing requirements, to the satisfaction of the relevant roads authority. If there is a dispute about the road upgrades to be implemented, or the implementation of these upgrades, then either party may refer the matter to the Secretary for resolution.	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022. No further changes		Complaint
3-26	Road Maintenance The Applicant must: (a) prepare a dilapidation survey in accordance with guidelines and standards established by Austroads of the designated vehicle route on Tangmangaroo Road, Wargeila Road and Yass Valley Way, as identified in the figures in APPENDIX 8: - prior to the commencement of any construction and/or decommissioning works, other than pre-construction minor works; - within 1 month of the completion of any construction and/or decommissioning works, other than pre-construction minor works; (b) rehabilitate and/or make good any development-related damage: - identified during the carrying out of the relevant construction and/or decommissioning works if it could	 Post-construction Dilapidation Surveys – Local Roads. Bango Wind Farm, dated 12 September 2023. Email from Yass Valley Council to BWF confirming they are satisfied with road dilapidation reports, dated 15 February 2024 The post-construction dilapidation surveys of local roads was undertaken on 15 August 2023. Based on audit interview discussions it is understood that the post construction dilapidation reports did not identify project-related damage requiring rectification. No disputes between Council and BWF were identified. 		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	endanger road safety, as soon as possible after the damage is identified, but within 7 days at the latest; and - identified during any dilapidation survey carried out following the completion of the relevant construction and/or decommissioning works within 2 months of the completion of the survey, unless the relevant roads authority agrees otherwise, to the satisfaction of the relevant roads authority. If the construction and/or decommissioning of the development is to be staged, the obligations in this condition apply to each stage of construction and/or decommissioning. If there is a dispute about the scope of any remedial works or the implementation of the works, then either party may refer the matter to the Secretary for resolution.			
3-27	Unformed Crown Roads The Applicant must ensure any unformed Crown Road reserves affected by the development are maintained for future use, unless otherwise agreed with the NSW Department of Industry - Crown Lands and Water.	Previous crown road licences were retired prior to current audit period.		Compliant
3-28	Traffic Management Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and the Councils, and to the satisfaction of the Secretary. This plan must: (a) detail the measures that would be implemented to: - minimise the traffic safety impacts of the development and disruptions to local road users during the construction and decommissioning of the development, including: i. consideration of potential interaction with Rye Park	Bango Wind Farm Project, Traffic Management Plan, dated 29 July 2022 DPHI letter to BWF – Approval of Traffic Management Plan, dated 11 August 2022 (Subcontractor TMP) Rex J Andrews, Traffic Management Plan – General Electric – Bango Wind Farm, Rev 09, dated 24 September 2020. BWF have an overarching TMP which has been cascaded into the General Electric subcontractor TMPs to ensure		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Wind Farm in consultation with the applicant of that project; ii. temporary traffic controls, including detours and signage; iii. notifying the local community about development-related traffic impacts; iv. minimising potential conflict between development-related traffic and: 1. rail services; 2. stock movements; and 3. school buses, in consultation with local schools; v. implement measures to minimise development-related traffic on the public road network outside of standard	consistency in requirements. The TMPs include authorised haul routes and other mitigations. The Auditor observed speed limits being obeyed on site. No traffic related complaints have been received during operations. Heavy vehicle movements are limited to maintenance and deliveries only during operations.		
	construction hours; vi. implement measures to minimise dirt tracked onto the public road network from development-related traffic; vii. ensuring loaded vehicles entering or leaving the			

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	viii. providing sufficient parking on site for all development-related traffic;			
	ix. responding to any emergency repair requirements or maintenance during construction and/or decommissioning; and			
	x. a traffic management system for managing over-dimensional vehicles; and			
	- comply with the traffic conditions in this consent;			
	(b) include a driver's code of conduct that addresses:			
	i. travelling speeds;			
	ii. procedures to ensure that drivers to and from the development adhere to the designated over-dimensional and heavy vehicle routes; and			
	iii. procedures to ensure that drivers to and from the development implement safe driving practices;			
	(c) include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct.			
	Following approval, the Applicant must implement the measures described in the Traffic Management Plan.			
3-29	AVIATION Notification of Aviation Authorities	Previously assessed as Compliant in Independent Audit No. 2, report dated October 2022.		Complaint
	Prior to the commencement of construction of any wind turbine or wind monitoring mast, the Applicant shall provide the following information to CASA, Airservices Australia and the RAAF (together the authorities):	No changes during audit period		
	 (a) co-ordinates of latitude and longitude of each turbine and mast; 			
	(b) the final height of each turbine and mast in Australian Height			

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Datum; (c) the ground level at the base of each turbine and mast in Australian Height Datum; (d) confirmation of compliance with any OLS; and (e) details of any aviation hazard lighting.			
3-30	Within 30 days of the practical completion of any turbine or mast, the Applicant must: (a) provide confirmation to the authorities that the information that was previously provided remains accurate; or (b) update the information previously provided	Evidence sighted: Bango Windfarm WTG notification spreadsheet Email from BWF to Air Servi es Australia and RAAF and CASE including spreadsheet, dated 5 October 2022 Email correspondence from CASA, dated 5 October 2022 acknowledging receipt of submission of information.		Complaint
3-31	RADIOCOMMUNICATIONS If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following notification of the disruption of the service unless the relevant service provider 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.	Complaint received regarding TV reception, dated 25 August 2023. BWF organised a technician to rectify the issue which resolved the complaint. Closed within 1 month of receiving the complaint.		Complaint
3-32	BUSHFIRE The Applicant must: (a) ensure that the development: i. provides for asset protection in accordance with the RFS's Planning for Bushfire Protection 2006 (or equivalent); ii. is suitably equipped to respond to any fires on site; (b) develop procedures to manage potential fires on site in consultation with the RFS; and (c) assist the RFS and emergency services as much as	Evidence sighted:		Complaint

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	practicable if there is a fire in the vicinity of the site.			
3-33	Safety The Applicant must: (a) prepare a Safety Management System for the development in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management' prior to commissioning any wind turbines on site; and (b) implement, and if necessary update, the system over the remaining life of the development.	Evidence sighted:		Complaint
3-34	Waste The Applicant must: (a) minimise the waste generated by the development (b) classify all waste in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste generated on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) ensure all waste is disposed of at appropriately licensed waste facilities.	Waste segregation identified during audit inspection. No waste classification and disposal of spoil has occurred during the audit period. Contract in place with Cleanaway to remove all waste streams from site.		Complaint
3-35	REHABILIATION & DECOMMISSIONING Rehabilitation Objectives – Decommissioning Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3. Table 3: Rehabilitation Objectives Features Objective	No decommissioning activities have occurred to date.		Not triggered



Condition ID.	Compliance Requireme	nt ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Development site (as a whole)	Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use as far as is reasonable and feasible			
	Revegetation	Restore native vegetation generally as identified in the EA			
	Above ground wind turbine infrastructure (excluding wind turbine pads)	To be decommissioned and removed, unless the Secretary agrees otherwise			
	Above ground ancillary infrastructure	To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary			
	Internal access roads	To be decommissioned and removed, unless an agreed alternative use is identified to the satisfaction of the Secretary			
	Land use	Restore or maintain land capability as described in the EA			
	Community	Ensure public safety			
3-36		areas of the site not proposed for future ogressively, that is, as soon as reasonably	The EPC contractor provided a final vegetation report however there were some areas that hadn't reached 80% rehabilitation and recommendations were provided for further rehabilitations. BWF have commissioned an Ecologist to update the rehabilitation assessment report		Complaint

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Any ind		prior to submission to CHPR as part of an updated Biodiversity Management Plan. The Auditor noted several examples of 'passive' progressive rehabilitation including maintenance of ERSED controls and	
Any ind	Site that cannot yet be permanently renabilitated.	restricted access to sheep from previously disturbed areas to allow for ground cover to establish.	
	Intling of Wind Turbines dividual wind turbines which cease operating for more than 12 cutive months must be dismantled within 18 months after that nth period, unless the Secretary agrees otherwise.	Not triggered	Not triggered



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
4-1	ENVIRONMENTAL MANAGEMENT Environmental Management Strategy Prior to the commencement of construction, the Applicant shall prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development;	Evidence sighted: • Bango Wind Farm, Environmental Management Strategy, Rev 3, dated 22 December 2022 • DPHI Comment Review Table for EMS, dated 16 June 2022 The Auditor noted that no specific training had been provided in relation to bird and	Status Compliant	
	(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: i. keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii. receive, handle, respond to, and record complaints; iii. resolve any disputes that may arise; iv. respond to any non-compliance; v. respond to emergencies; and (e) include: i. copies of (or reference to) any strategies, plans and programs approved under the conditions of this consent; and ii. a clear plan depicting all the monitoring to be carried out in relation to the development including a table summarising all the monitoring and reporting obligations under the conditions of this consent. Following approval, the Applicant shall implement the Environmental Management Strategy.	2023. Ref: SSD-6686-PA-34 Bango Wind Farm, Environmental Management Strategy, Rev 002, dated 11 October 2024 (DRAFT) The EMS is currently being reviewed and updated and at the time of the audit had been submitted to DPHI for review. The Auditor reviewed the draft EMS as part of this audit, in addition to the currently approved version. Evidence on implementation of the EMS includes: Training and awareness (Section 6) GE Site Induction, Bango Wind Farm. Including pollution, dust, waste and environmental management slides.	bird and bat strike triggers that have occurred on the project, there may be benefit in providing onsite workers specific training in relation to their responsibilities regarding monitoring and reporting of bird and bat strikes. 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.	



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		 Archer is used to track corrective actions. Auditing Independent Environmental Audits are undertaken in accordance with the CoAs. Internal environmental audits. The Auditor sighted numerous internal audits. 		
4-2	Revision of Strategies, Plans and Programs Within 3 months of the submission of: (a) an incident report under condition 4 below; (b) an independent environmental audit report under condition 6 below; or	The following reviews were undertaken within the audit period in accordance with CoA 4-2: • A review was undertaken on 17 January 2023 following IEA#2 – no updated required		Compliant

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) any modification to the conditions of this consent (unless the conditions require otherwise), the Applicant shall review and, if necessary, revise the strategies, plans, and programs required under this consent 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. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.	On 25 August 2023 review was undertaken following notification of CASA lighting incident – no update required		
4-3	Community Consultative Committee The Applicant shall establish and operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary and in accordance with Community Consultative Committee Guidelines for State Significant Project (2016), or its latest version.	DPHI approval letter of CCC Independent Chairperson Peter Gordan, dated 2 October 2024 Lisa Andrews was the previous CCC Independent Chairperson Peter Gordan is current Chairperson and it has been agreed to push back CCC meetings to every 12 months The next CCC meeting is in the process of being organised.		Compliant
4-4	INCIDENT NOTIFICATION The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of the incident. The notification must identify the development, including the development application number and the name of the development, and set out the location and nature of the incident.	 Evidence sighted: BWF letter to DPHI – Aviation Lighting Outages, dated 29 June 2023. The BWF letter to DPHI was sent to notify DPHI of an incident involving a power outage causing aviation lighting to fail. Refer to CoA 3-3 for further details. DPHI letter to BWF – Incident Notification, Power Outage May 2023, dated 8 July 2023. DPHI responded to the incident notification acknowledging that it had been reported in accordance with CoA 4-4. DPHI requested that BWF review and, if necessary, update strategies, plans and programs in accordance with CoA 4-2. 		Compliant



Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
4-5	NON-COMPLIANCE NOTIFICATION The Department must be notified via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be undertaken, to address the non-compliance.	In response to the aviation lighting incident reported in accordance with CoA 4-4, DPHI issued a warning letter confirming that BWF had not complied withy CoA 3-3 (failure to meet CASA's specific requirements). Given that the incident was self-report to DPHI in accordance with CoA 4-4, the Auditor considers that BWF have met the requirements of CoA 4-5.		Compliant
4-6	INDEPENDENT ENVIRONMENTAL AUDIT Within 6 months of the commencement of construction, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the development. These audits must: (a) be led conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) be carried out in consultation with the relevant agencies; (c) assess whether the development complies with the relevant requirements in this consent, any strategy, plan or program required under the above mentioned consent; and (d) recommend measures or actions to improve the environmental performance of the development, and/or any strategy, plan or program required under this consent Within 3 months of commencing an audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.	This is the third IEA undertaken on the project. The site inspection for this IEA was undertaken on 14 August 2025ly 2025, within three (3) years of the previous IEA, dated 24 August 2022. This IEA has been undertaken in accordance with IAPAR 2020 and the requirements of CoA 4-6 of SSD-6686.		Compliant
4-7	ACCESS TO INFORMATION	The BWF project website can be found at:		Compliant
	The Applicant shall: (a) make the following information publicly available on its	Bango Wind Farm, NSW Squadron Energy		

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Condition ID.	Compliance Requirement ¹ / Conditions of Approval	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	website as relevant to the stage of the development:	The Auditor has confirmed that all required documents are		
	• the EIS;	listed on the project website, which are maintained and up to date.		
	 the final layout plans for the development; 	Evidence sighted:		
	 current statutory approvals for the development 	2025 Squadron internal audit - website audit		
	 approved strategies, plans or programs required under the conditions of this consent; 			
	 the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; 			
	 a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; 			
	 a complaints register, which is to be updated on a monthly basis; 			
	 minutes of CCC meetings; 			
	• the annual Statement of Compliance with the EPL;			
	 any independent environmental audit, and the Applicant's response to the recommendations in any audit; and 			
	any other matter required by the Secretary; and			
	(b) keep this information up to date, to the satisfaction of the Secretary.			



Appendix B – Planning Secretary Audit Team Endorsement



Appendix B – Planning Secretary Audit Team Endorsement

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-6686-PA-66

MS Sheree Kidziak Environmental Advisor Bango Wind Farm Pty Ltd Suite 1.01 Level 1 17 Moore Street Canberra Australian Capital Territory 2601 23/07/2025

Sent via the Major Projects Portal only

Subject: Bango Wind Project- Independent Environmental Audit Team Request

Dear Ms Kidziak

Reference is made to your post approval matter, SSD-6686-PA-66, request for the Planning Secretary's approval of an audit team to conduct the Independent Environmental Audit for the Bango Wind Project, submitted to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 22 July 2025, as required by Schedule 4 Condition 6 of SSD-6686 (Consent).

NSW Planning has reviewed the independent auditor nominations and based on the information provided is satisfied that the proposed team, are suitably qualified, experienced, and independent.

Therefore, in accordance with Schedule 4 Condition 6 of the Consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team, from KPMG Australia:

- 1. Dylan Jones Lead Auditor.
- 2. Gary Selwyn Alternate Lead Auditor and Technical Reviewer
- 3. Manya Narain Audit Team Member.

Please note, the Lead Auditor must attend the site inspection/s.

Please ensure this correspondence is appended to the Independent Audit Report. The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and regularization.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au





Department of Planning, Housing and Infrastructure



Should you wish to discuss the matter further, please contact Jennifer Rowe, (Senior Compliance Officer) on 0242471851 or email compliance@planning.nsw.gov.au

Yours sincerely

Katrina O'Reilly

Team Leader - Compliance

Compliance

As nominee of the Planning Secretary



Appendix C - Consultation Records



Appendix C – Consultation Records

Agency	Contact / email	Response Received
DPHI	compliance@planning.nsw.gov.au Jennifer Rowe – Senior Compliance Officer / jennifer.rowe@planning.nsw.gov.au	Yes – see details below
EPA	info@epa.nsw.gov.au Janine Goodwin – Unit Head – Central West and Southern Coast & Tablelands / Janine.Goodwin@epa.nsw.gov.au	Yes – see details below
CHPR	Micheal Wood / Michael.Wood@environment.nsw.gov.au	Yes – see details below
CASA	Airspace.Protection@casa.gov.au	No
ccc	Lisa Andrews – former CCC Independent Chair / ic.articulatesolutions@gmail.com Peter Gordon – current CCC Independent Chair / peter.gordon@charterpoint.com.au	Yes – see details below
Yass Valley Council	council@yass.nsw.gov.au	No
Hilltops Council	mail@hilltops.nsw.gov.au	No



Bango Wind Farm Independent Audit No. 3 SSD-6686 September 2025

Example consultation request email

Dear Sir / Madam,

KPMG has been appointed by Bango Wind Farm Wind Farm Pty Ltd to undertake an independent environmental audit (IEA) of the Bango Wind Farm. The Department of Planning, Housing and Infrastructure (DPHI) has endorsed the Audit Team, including myself as Lead Auditor.

In accordance with Schedule 4, Condition 6 (b) of the development consent (SSD-6686), the Auditor is required to consult with relevant agencies during the audit.

Accordingly, please feel free to contact me directly via email or phone should you like to raise any matters for the Auditor to consider as part of the audit process.

Regards,

Dylan Jones

Director ESG Advisory & Assurance Climate Change & Sustainability

KPMG International Towers Sydney 3 300 Barangaroo Avenue, Sydney NSW 2000 Australia

DPHI response

To Dylan Jones

I have reviewed your email to NSW Planning, requesting consultation on the upcoming Independent Environmental Audit (IEA) for the Bango Wind Farm development, as required by Schedule 4, Condition 6 of SSD-6686 (Consent).

The Audit needs to ensure that it addresses all conditions of consent for the Project and meet the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020). https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

As part of your Audit can you please address/review the following aspects:

- Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance
 documents prepared to satisfy the conditions of consent, including management plans.
- Review the environmental performance of the development including actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical
 extent of the development in comparison with the approved boundary.
- A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc.
- Ensuring all environmental controls have been installed, maintained and are adequate.
- Biodiversity impacts addressed appropriately, particularly in relation to the implementation of the Bird and Bat Adaptive Management Program and investigations of biodiversity triggers.
- Lighting impacts addressed appropriately, particularly in relation to the implementation of casa lighting compliance/requirements, design and record management around
 maintenance of lights and notification to affected parties.
- Noise impacts addressed appropriately, particularly in relation to noise monitoring.
- Details of the works that have been undertaken so far at the Project.
- Are accurate records are being kept, specifically in relation to community complaints and actions.



Bango Wind Farm Independent Audit No. 3 SSD-6686 September 2025

Regarding consultation with other agencies, please consult with the following:

- a. Local Council Hilltops Council and Yass Valley Council
 b. Environment Protection Authority
- c. NSW DCCEEW CPHR (previously known as BCS)
- d. Community Consultative Committee
- e. Civil Aviation Safety Authority

NSW Planning's Compliance Team have received the following below, regarding the Project, please review these matters to ensure any required notifications and actions have been appropriately undertaken and documented to address these issues at Project:

- Complaint

 - implanii.
 a. 24.8.23 Concerns regarding turbine lights are flashing not static and are causing night pollution.
 b. 13.3.24 Noise impacts and monitoring report concerns about noise exceedance, landscaping not adequate and gates being left open after site visit.
- - a. 9.10.23 Warning Letter issued for failing to comply with Schedule 3 condition 3 (b) of the Consent

This email is to be appended to the Audit Report.

The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to independent Environmental Audits have been met.

Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities, thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

Should you have any further questions, please don't hesitate to contact me on the details below.

Kind regards,

Jennifer Rowe Senior Compliance Officer

EPA response

Dear Dylan

Thank you for your notification to the EPA of the upcoming Independent Environmental Audit.

I have had a look through our records-nothing specific to raise other than the EPA's expectation that operations are compliant with the conditions are compliant with the conditions of the coof the environment protection licence.

If there is anything specific you would like to discuss, pls reach out (email or mobile).

Many thanks

CHPR response

Hi Dylan,

Thanks for your email. My colleague Jen Rowe has already responded.

Regards

Michael Wood



CCC response

Hi Dylan, thanks for the email. I am no longer the Independent Chair for the Bango CCC. I resigned in July 2024. The last CCC that I chaired was on 30/7/24 and I'm not sure who the new chair is.

I can however confirm that I established the CCC in 2013 and the CCC met on a quarterly basis during the development and construction of the wind farm, where members received updates on the activities on site. In the later years, the meetings moved to bi-annally and then annually as there were no operational issues.

Best regards Lisa



Appendix D - Site Inspection Photographs



Appendix D – Site Inspection Photographs

Observations from the site inspection are provided in the following table. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

Site Inspection Details		
Site Location: Lachlan Valley Way, Boorowa, NSW 2586		
Inspection Date / Time Period:	14 August 2025 / 9.15AM – 12PM	
Weather Conditions:	Mild, sunny, windy on ridges.	
The Auditee:	BWF Nominees Pty Ltd	



Photo 1 Main site entrance on Lachland Valley Way.



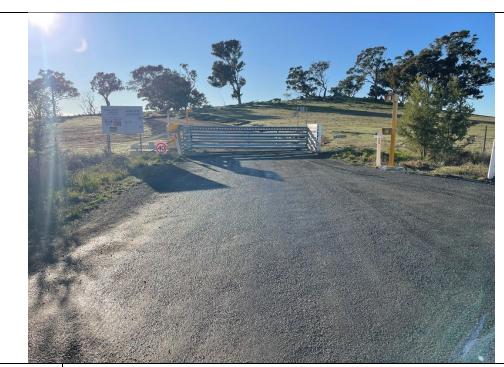


Photo 2 Main site entrance on Lachlan Valley Way, with rumble grid, free of sediment tracking.



Photo 3 Operations and maintenance (O&M) office, entrance.





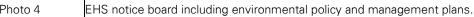




Photo 5 External waste oil storage area, notes as being uncovered.





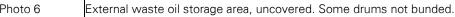




Photo 7 Dedicated waste oil storage shed, noted limited capacity.





Photo 8 Electrical forklift used within O&M shed.



Photo 9 Waste bins demonstrating segregation of waste streams.





Photo 10 Previously cleared batter showing signs of rehabilitation.



Photo 11 Previously disturbed area fenced off from sheep allowing for progressive rehabilitation to occur.





Photo 12 Cultural heritage no-go zone, signage installed.



Photo 13 Golden Hollows biodiversity stewardship area, entrance.



Photo 14



Golden Hollows biodiversity stewardship area. Evidence of manual sifton bush removal, as required by the management actions listed in the stewardship agreement.



Photo 15 Golden Hollows biodiversity stewardship area. Evidence of feral animal traps, as required by the management actions listed in the stewardship agreement.





Photo 16 Rock-lined swale drains.



Photo 17 Rock armouring around culverts.





Photo 18 Recently rectified rock-lined swale drains around WTG pad.



Photo 19 Representative WTG pad.



Appendix E - Audit Agenda





Appendix E - Audit Agenda

Independent Environmental Audit – Bango Wind Farm		
Project	Bango Wind Farm	
Planning Approval	SSD - 6686	
Proponent	Bango Wind Farm Pty Ltd	
Location of Audit	Lachlan Valley Way, Boorowa, NSW 2586	
Date of Audit	14 August 2025	
Audit Team	Dylan Jones (Lead Auditor) Manya Narain (Auditor Assistant)	
Site Contact	Sheree Kidziak, Environmental Advisor	
Audit Criteria	Conditions of consent SSD-6686 Schedules 2, 3 and 4 and appendices, in accordance with Independent Audit Post Approval Requirements 2020	
Audit Period	14 August 2022 (date of previous independent audit) to 14 August 2025	
Audit Objectives	Assess compliance with SSD-6686 conditions of approval.	

Agenda		
Item	Time	Location
Introduce the auditor and auditee team members. Confirm audit scope, audit period, objectives and outline the methodology and resources required.	8:30 AM - 8:45 AM	Bango Wind Farm (in person)
Auditee to provide an overview of site processes and facilitate site access. Auditor to sight current site activities and assess the implementation of mitigation measures and effectiveness of management plan requirements. Identify environmental aspects, impacts, controls and onsite documentation.	8:45 AM -11:30 AM	
Site Inspection Debrief / Lunch Break	11:30 AM - 12:00 PM	
Review Compliance to Consent Conditions		
SCHEDULE 2 – Administrative Conditions	12:00 PM – 1:00 PM	Bango Wind Farm
SCHEDULE 3 – Environmental Conditions - General	1:30 PM – 2:30 PM	(in person and online via MS Teams)
SCHEDULE 4 – Environmental Management, Reporting and Auditing	2:30 PM – 3:00 PM	
Auditor Consolidation / Internal Meeting	3:00 PM – 3:15 PM	



l additional requests for information and timelines	Closing Meeting Discuss preliminary outcomes of the audit including details of any non- compliances and opportunities for improvement. Confirm next steps including additional requests for information and timelines	3:15 PM – 3:45 PM	
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Responsibilities		
Roles	Name	Responsibilities
Lead Auditor	Dylan Jones	Schedule audit, prepare audit materials and manage resources Provide Audit Agena to BWF, including confirmation on a scope and timeframes Attend the site visits Lead interviews with key personnel Lead the Opening and Closing Meetings Prepare the Independent Audit Report
Auditor Assistant Audit Specialists	Manya Narain	 Support the lead auditor by preparing audit materials such as Audit Plan, schedules, interview questions and report drafting. Attend interviews remotely. Support preparation of the Independent Audit Report N/A
Auditee	Sheree Kidziak – Environment Advisor	Liaise with BWF personnel to attend site inspection and audit interviews, as required Provide WH&S supervision to KPMG staff while on site Provide meeting rooms for audit interviews Respond to request for information prior to, during and following the day of the audit, as required
	Grant Stepien – Operations Manger	 Provide WH&S supervision to KPMG staff while on site Provide meeting rooms for audit interviews Respond to request for information prior to, during and following the day of the audit, as required.

Notes

- 1 The audit will cover both the construction and operational requirements in accordance with Conditions of Consent SSD-6686 Schedule 2, 3 and 4 as they relate to operational phase requirements only.
- 2 The audit will cover a sampling of records relevant to the scope. KPMG auditors will apply their professional judgment based on the information made available during the audit.
- 3 KPMG will conduct the audit in accordance with the Independent Auditing Post Approval Requirements (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.
- 4 KPMG will issue a Request for Information (RFI) document separately to this agenda. To enable an efficient audit, it is requested that information is provided prior tot the audit.



Appendix F - Audit Attendance Sheet



Appendix F - Audit Attendance Sheet



Audit Attendance Sheet

Project	Bango Wind Form Audit Ref. BWF-IEA-03
Auditee	BWF Nominees Ptyld Load Dylan Jones
Location	Bango Wind Form, Boorowa NSW
Opening Meeting Date / Time	14 August 2025 / 8:30am
Closing Meeting Date / Time	18 August 2025 / 11 am

	2		Sign	ature
Name	Organisation	Position	Opening Meeting	Closing Meeting
Dylan Jones	KPMG	Lead Auditor	DF.	2
Dylan Jones Shere Kidziale Grant Stephen	Squadron Evraj	Environmental Adv	501 A	Shi
Grant Stepien	Sac V	Manager	R.	
Manya Narain	KPMa	Auditor	Mista	Mex Notes
				/
	,			

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Document Classification: KPMG Conflidential



Appendix G - Independent Audit Declarations



Appendix G – Independent Audit Declarations

Independent Audit Report Declaration Form		
Project Name	Bango Wind Farm	
Consent Number	SSD-6686	
Description of Project	Construction and operation of up to 46 wind turbines	
Project Address	Lachlan Valley Way, Boorowa, NSW 2586	
Proponent	Bango Wind Farm Pty Ltd	
Title of Audit	Independent Audit No.3	
Date	19 September 2025	

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii the findings of the audit are reported truthfully, accurately and completely;
- iii I have exercised due diligence and professional judgement in conducting the audit;
- iv I have acted professionally, objectively and in an unbiased manner;
- V I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to DPE prior to the audit; and
- viii I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my 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).

Name of Auditor	Dylan Jones	
Signature	Dylan Jones	
	Lead Auditor	
Qualification	B. Env. Sci. & Mgt.	
	M. Env. Eng. Mgt.	
	Exemplar Global Lead Auditor: Environmental Management Systems	
Company	KPMG	



Independent Audit Report Declaration Form		
Project Name	Bango Wind Farm	
Consent Number	SSD-6686	
Description of Project	Construction and operation of up to 46 wind turbines	
Project Address	Lachlan Valley Way, Boorowa, NSW 2586	
Proponent	Bango Wind Farm Pty Ltd	
Title of Audit	Independent Audit No.3	
Date	19 September 2025	

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- iv I have acted professionally, objectively and in an unbiased manner;
- V I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to DPE prior to the audit; and
- viii I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

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- 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)

Name of Auditor	Gary Selwyn	
Signature	Gary Selwyn	
	Alternate Lead Auditor	
Qualification	BSc (Hons), MSc	
	Institute of Environmental Management and Assessment (IEMA) Registered Principal Environmental Auditor	
Company	KPMG	



Independent Audit Report Declaration Form		
Project Name	Bango Wind Farm	
Consent Number	SSD-6686	
Description of Project	Construction and operation of up to 46 wind turbines	
Project Address	Lachlan Valley Way, Boorowa, NSW 2586	
Proponent	Bango Wind Farm Pty Ltd	
Title of Audit	Independent Audit No.3	
Date	19 September 2025	

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

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- ii the findings of the audit are reported truthfully, accurately and completely;
- iii I have exercised due diligence and professional judgement in conducting the audit;
- iv I have acted professionally, objectively and in an unbiased manner;
- V I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to DPE prior to the audit; and
- viii I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my 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)

Name of Auditor	Manya Narain
Signature	Manya Narain
Qualification	Audit Team Member B. (Hons) Biomedical Engineering
Company	KPMG



Appendix H - Documents Reviewed



Appendix H – Documents Reviewed

- Bango Wind Farm, Biodiversity Management Plan, Rev 3, dated 10 December 2020
- Bango Wind Farm, Bird and Bat Adaptive Management Plan, dated 29 December 2021
- Bango Wind Farm, Environmental Management Strategy, Rev 3, dated 22 December 2022
- Bango Wind Farm, Heritage Management Plan, Rev 004, dated 15 April 2025
- Bango Wind Farm, Pollution Incident Response Management Notification Sheet
- Bango Wind Farm, Superb Parrot Conservation Research Plan, Rev 2, dated 29 July 2020
- Bango Wind Farm, Traffic Management Plan, dated 29 July 2022
- Bango Wind Farm, Environmental Impact Statement, Volume 1, dated September 2016 (EIS)
- Letter from CWP to DPHI Re: Section 4.55 Modification request (Modification report)
- Bango Wind Farm, Final Layout Plan, dated 16 July 2020.
- DPHI approval of Final Layout Plans, dated 15 August 2020
- Letter from Squadron Energy to DPHI, Re. Bango Wind Farm SSD-6686 Notice of commencement date of operation, dated 14 December 2023
- Letter from Squadron Energy to DPHI, Re. Bango Wind Farm SSD-6686 Confirmation of the commencement date of operation, dated 21 December 2023
- DPHI correspondence Re. Notification of commencement of operations 14-23 December 2023, dated 19 December 2023. Ref: SSD-6686-PA-52
- Email correspondence from BWF to Yass Valley Council and Hilltops Council Re. Final notification of commencement of operations, dated 20 December 2023.
- Letters from BWF to Yass Valley and Hilltops Councils Re. notification of commencement of operations, dated 14 December 2023.
- Letters from BWF to Yass Valley and Hilltops Councils Re. notification of commencement of operations, dated 21 December 2023.
- Final Occupation Certificate No. 134.14/2020, prepared by Pro Cert Group Pty Ltd, dated 7 December 2023.
- Type Certificate Registration No. 44 220 19288026-TC-IEC-a, Rev. 3
- The Type Certificate was for wind turbine GE5.x-158 and GE4.x-158. The Type Certificate included normative references including:
- IEC 61400-1 "Wind Turbines Part 1: Design requirements", Third Edition, 2005-08 and Amendment 1, 2010-10
- Bango Wind Farm Visual Impact Assessment Report, Dwelling Address: 1586 Laverstock Rd, Laverstock, prepared by Moir Landscape Architecture, dated 21 February 2023.
- Bango Wind Farm Screening Assessment 24 Month Final, prepared by EcoLogical, dated
 12 August 2025
- Section Completion Certificate, Section 5, Bango Wind Farm Engineer, Procure, Construct Contract (EPC Contract), dated 7 August 2019
- Bango Wind Farm, Sonus Environmental Nose Assessment, dated June 2024
- Disturbance registers from EPC Contractor, dated until September 2020
- Biodiversity credit retirement report





- Letter from DPHI dated 29 May 2023 Ref SSD-6686-PA-48.
- Post-construction Dilapidation Surveys Local Roads. Bango Wind Farm, dated 12 September 2023.
- Email report from Yass Valley Council to BWF confirming they are satisfied with road dilapidation reports, dated 15 February 2024
- Bango Windfarm WTG notification spreadsheet
- Email from BWF to Air Servi es Australia and RAAF and CASE including spreadsheet, dated
 5 October 2022
- Email correspondence from CASA, dated 5 October 2022 acknowledging receipt of submission of information.
- BWF letter to DPHI Aviation Lighting Outages, dated 29 June 2023.
- DPHI letter to BWF Incident Notification, Power Outage May 2023, dated 8 July 2023.
- NHVR, Oversize and/or Overmass (OSOM) or Dimension Extension Permit, issued to Rex J. Andrews Pty Ltd from 25 October 2024 to 23 January 2025.
- DPHI approval letter of CCC Independent Chairperson Peter Gordan, dated 2 October 2024.
- DPHI Comment Review Table for EMS, dated 16 June 2022
- DPHI letter to BWF, approval of Environmental Management Strategy (Rev 3). Letter dated 20 January 2023. Ref: SSD-6686-PA-34
- Bango Wind Farm, Environmental Management Strategy, Rev 002, dated 11 October 2024 (DRAFT)
- Bango Wind Farm, Bird and Bat Adaptive Management Plan, dated December 2021
- Monthly BBAMP inspection reports undertaken by Nature Advisory (included increased monitoring required in response to trigger events)
- Four (4) BBAMP trigger events occurred within the audit period
- Email from BWF to DCCEEW Notification of Three Non-threatened Species Triggers, dated 13 February 2024
- Evidence of post approval submission to DPHI, notification of WSFB trigger, dated 12
 March 2024
- DPHI letter to BWF BBAMP White-striped Freetail Bat January 2024, dated 8 March 2024, Ref:SSD-6686-PA-56
- Bango Wind Farm White-striped free-tailed Bat Trigger Investigation report, prepared by Nature Advisory, dated March 2024
- Bango Wind Farm BBAMP Implementation Threatened Species Incident Report and Action Plan for White-throated Needletail – January 2024
- Email from BWF to DCCEEW Notification of White-throated Needletail Mortality, dated 18 January 2024
- Email from BWF to DCCEEW Notification of White-throated Needletail Investigation Report, dated 15 March 2024
- DPHI letter to BWF BBAMP White-throated Needletail January 2024, dated 8 March 2024. Ref:SSD-6686-PA-55
- Bango Wind Farm, White-throated Needletail Trigger Investigation Review and Recommendations Report, dated March 2024
- Email from BWF to Commonwealth DCCEEW Notification of Yellow-bellied Sheathtail Bat



Mortality, dated 26 March 2025.

- Letter from CHPR to BWF Yellow-bellied Sheathtail Bat trigger report March 2025
- Email from BWF to NSW DCCEEW Notification of Yellow-bellied Sheathtail Bat Mortality, dated 26 March 2025.
- Email from BWF to CHPR Response Letter Bango Wind Farm May 2025
- Bango Wind Farm, Yellow-bellied Sheathtail Bat Impact Trigger Investigation and Actions Plan, dated April 2025
- Bango Wind Farm, Grey Fantail Impact Trigger Investigation and Actions Plan, dated May 2025
- DPHI letter to BWF, Bango Wind Grey Fantail Impact Trigger Investigation and Action Plan Report, dated 17 June 2025. Ref: SSD-6686-PA-65.
- Email from BWF to NSW DCCEEW Non-threatened trigger event, dated 9 May 2025.



