

Annual Compliance Report EPBC 2018/8141



Clarke Creek Wind Farm, Queensland
EPBC 2018/8141

7 March 2025 – 6 March 2026



Final

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved
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DECLARATION OF ACCURACY

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed:



Full name (please print):

Candice Somerville

Position (please print):

Environmental Manager

Organisation:

Squadron Energy

Date:

02/04/2026

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1 Introduction

This Annual Compliance Report has been prepared in relation to the Clarke Creek Wind Farm (the Project).

This report outlines the compliance of the Project with its relevant approval conditions under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), detailed within the approval decision dated 9 November 2018 (Ref. EPBC 2018/8141), and as varied on 25 November 2025.

This report has been prepared in accordance with Condition 25 and 25A to 25G of EPBC 2018/8141 as varied on 25 November 2025, which state:

Table 1: Condition 25 and 25A to 25G (annual compliance reporting)

Condition Number / reference	Condition
25	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period) .
25A	<p>The approval holder must include the following information in all compliance reports prepared for each ACR period following commissioning:</p> <p>a count of all turbine strikes detected for EPBC Act listed bird and bat species in the project area and in each Phase, during the ACR period, and a compilation and analyses of information in relation to each turbine strike regarding:</p> <ol style="list-style-type: none"> the method of detection; the species detected; prevailing environmental/meteorological conditions at the estimated time of the collision; and likely factors in the presence of the EPBC Act listed bird and bat species leading to the collision; <ol style="list-style-type: none"> estimations of annual mortality and injury rates for each EPBC Act listed bird and bat species, calculated in accordance with the BBMP(s) for each Phase approved by the Minister; species occurrence records in accordance with the <i>Guidelines for biological survey and mapped data</i>, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing; and an evaluation of effectiveness of the measures implemented during the reporting period to avoid and mitigate mortality and/or injury to EPBC Act listed threatened bird and bat species
25B	<p>The approval holder must ensure each compliance report includes:</p> <ol style="list-style-type: none"> accurate and complete details of compliance and any non-compliance with: <ol style="list-style-type: none"> each condition attached to this approval decision, and all commitments made in each plan, a schedule of all plans in effect in relation to these conditions during the ACR period, accurate and complete details of how each plan was implemented during the ACR period, and if any incident occurred, accurate and complete details of each incident
25C	The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
25D	<p>The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website:</p> <ol style="list-style-type: none"> each compliance report; and a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.
25E	The approval holder must:

Condition Number / reference	Condition
	<p>a. Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public.</p> <p>b. If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.</p> <p>c. If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.</p>
25F	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website . In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website .
25G	<p>The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report is published and until the expiry date of this approval.</p> <p>Note: Compliance reports may be published on the department's website.</p>

The following definitions apply in relation to Conditions 25, 25A to 25G:

- **Annual Compliance Report period or ACR period:** means each subsequent 12-month period following the date of **commencement** of **Phase 1** until the expiry of this approval, unless otherwise specified in writing by the **Minister**.
- **Business days:** means a day that is not a Saturday, a Sunday or a public holiday in the state of Queensland..
- **Commissioning:** means all activities, including turning of turbines, after the components of the wind turbines are installed.
- **Compliance report(s):** means a written report of compliance with, and fulfilment of, these conditions (including compliance with commitments made in plans).
- **Department:** means the Australian Government agency responsible for administering the EPBC Act.
- **EPBC Act listed threatened bird and bat species:** includes White-throated Needletail (*Hirundapus caudacutus*); Rainbow Bee-eater (*Merops ornatus*); Rufous Fantail (*Rhipidura rufifrons*); Fork-tailed Swift (*Apus pacificus*) and Satin Flycatcher (*Mviagra cvanoleuca*); Red Goshawk (*Erythrotriorchis radiates*); and Corben's Long-eared Bat (*Nyctophilus corbeni*).
- **Minister:** means the Australian Government Minister administering the EPBC Act including any delegate thereof.
- **Phase(s):** means Phase 1 and/or Phase 2.
- **Phase 1:** means the areas within the project area south of the red line and cross hashed purple at Attachment A, comprising and entirely contained within lots: 8ROP41, 23CP896088, 18RP848821, 1RP801235, 1SP303299, 3RP801346, 3ROP178 and 4ROP192.
- **Plan(s):** means any of the documents required to be prepared, approved by the Minister, and/or implemented by the approval holder and published on the website in accordance with these conditions (includes action management plans and/or strategies).

- **Project area:** means the areas contained within the black and white dashed line at Attachment A, comprising and entirely contained within lots: RP614441, 10RP614442, 1SP153335, 8ROP41, 23CP896088, 18RP848821, 1RP801235, 1SP303299, 3RP801346, 3ROP178 and 4ROP192.
- **Protected matter(s):** means a matter protected under a controlling provision in Part 3 of the **EPBC Act** for which this approval has effect, including but not limited to **EPBC Act listed bird and bat species**.
- **Sensitive ecological data:** means data as defined in the *Sensitive Ecological Data – Access and Management Policy V1.0, Commonwealth of Australia 2016*..
- **Website:** means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

This report has also been prepared in accordance with the 'Annual Compliance Report Guidelines 2014' published in 2023 by the Commonwealth Department of Climate Change, Energy, the Environment and Water.

2 Project Description

2.1 Project Details

Table 2: Project details

Project item	Description
Approval Decision reference	EPBC 2018/8141
Date that the approval was last varied	25 November 2025
Period for which the approval has effect	The approval has effect until 30 November 2050
Project name	Clarke Creek Wind Farm
Approval holder ACN / ABN	Clarke Creek Energy Pty Ltd ACN: 614 169 096; and Isaac Wind & Solar Energy Pty Ltd ACN: 615 593 078
Approved action	To construct and operate up to 195 wind turbines and associated ancillary infrastructure within the locality of Clarke Creek, 150 kilometres north-west of Rockhampton, Queensland; as described in the referral received by the Department on 15 January 2018 [See EPBC Act referral 2018/8141].
Project location	The Project is located within the Clarke Creek locality being within the Isaac Regional Council (IRC) and Livingstone Shire Council (LSC) local government areas, approximately 150 kilometres (km) north-west of Rockhampton in Central Queensland. The project layout is provided in Figure 1.
Date of commencement of the action	7 March 2022
Reporting period of this report	7 March 2025 – 6 March 2026
Date of preparation of the report	27 March 2026

2.2 Key Parties

- Squadron Energy – Principal
- Jacob's – Owners Engineer
- Catcon – Civil Balance of Plant Contractor
- Yurika – Electrical Balance of Plant Contractor
- Powerlink – Grid Operator / Contractor
- Goldwind Constructions Australia – Turbine Supplier and Installation Contractor
- Siemens – Synchronous Condenser and Transformer Supplier / Installer
- Stanwell - Asset Management

The Project has been supported by a range of consultants to support delivery, monitoring, reporting and approvals, including:

- Nature Advisory – Bird and Bat Management Plan and monitoring program implementation
- Umwelt Consultants and EcoK9 – Bird and bat monitoring program implementation
- Green Tape Solutions - Cycad translocation and monitoring, Offset Management Planning
- CQG Pty Ltd - Flora and fauna pre-clearing surveys
- AECOM – Noise monitoring implementation

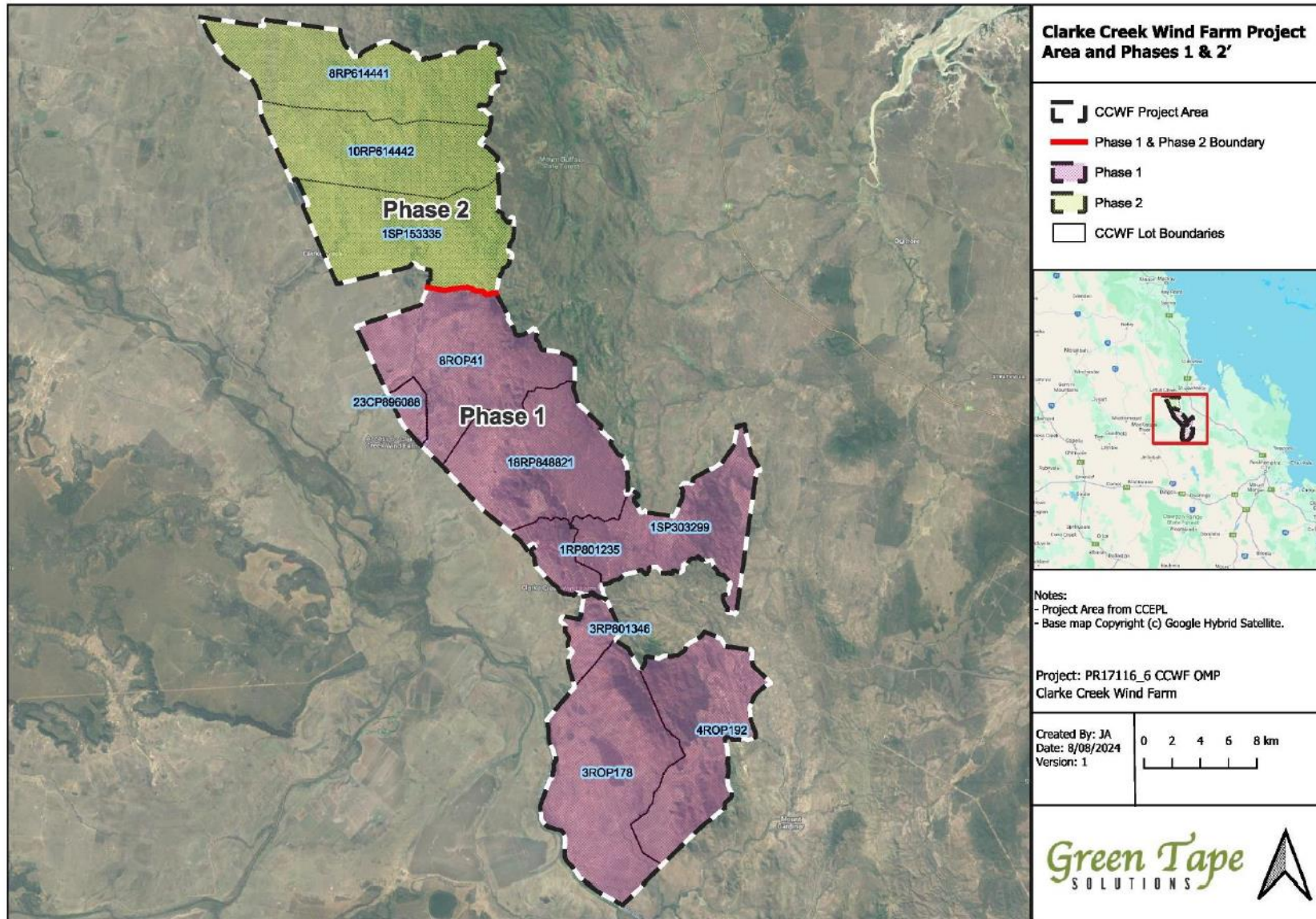


Figure 1: Clarke Creek Wind Farm Project Area and Phases 1 and 2

2.3 Environmental Management Framework

The site-based contractors and the owner's team have Health Safety & Environmental (HSE) staff onsite to manage all related HSE matters. Each Contractor has a Construction Environmental Management Plan (CEMP), Workplace Health and Safety Management Plan (WHSMP) and Project Management Plan which prescribe what environmental activities will be/are managed and how breaches/incidents are managed and notified to the Squadron Energy and regulators. These plans include and detail, where required, the relevant conditions and management plan requirements of the Commonwealth approval (EPBC 2018/8141) and Queensland State development approval for the Project.

2.4 Project Status

As at the end of the reporting year (ending 6 March 2026) the commissioning of Phase 1 was ongoing, and construction of Phase 2 had not yet commenced.

For Phase 1 of the project, the key activities undertaken during the reporting period are summarised in Table 3.

Table 3: Status of Phase 1 activities as at the end of the reporting period

Activity	Details and status as at end of reporting period
Road and hardstand construction	Access roads to turbines are completed
Turbine foundations	100% of turbine foundations poured.
Overhead powerline construction	44 km of overhead powerlines constructed (100% complete)
Substation construction	Construction of three substations required for Phase 1 of the wind farm is completed <ul style="list-style-type: none"> Northern substation (100% complete) Central substation (100% complete) Southern substation (100% complete)
Synchronous condenser installation	The synchronous condenser installation is completed
Turbine component delivery	Turbine component deliveries to the site.
Turbine component installation	100 turbines erected
Turbine commissioning	Commissioning ongoing during this report period.
Plan preparation	Refer to the Schedule of Plans provided at Appendix A.

2.5 Variation to EPBC 2018/8141 (25 November 2025)

Under Section 143(1)(c) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), a variation to the conditions of approval (EPBC 2018/8141) allowed for minor physical disturbance activities (as listed under the approval's definition of commence/commencement/commencing) to take place within the project area before the Phase 2 Offset Management Plan is approved. Additionally, to clarify requirements, the approval conditions have been updated so each Offset Management Plan submitted must comply with the EPBC Act Environmental Offset Policy. The definition title has also been changed to 'EPBC Act listed bird and bat species' to unify various references found in the instrument under a single definition. These amendments took effect on November 25, 2025.

Although the variation introduced changes to the approval conditions, these amendments were primarily clarificatory in nature and did not alter have substantive impacts for compliance. Accordingly, Table 5 of this Annual Compliance Report assesses compliance against the revised wording of EPBC 2018/8141 conditions for the reporting period.

3 EPBC Act Approval Condition Compliance

3.1 Compliance Scoring

The designations in [Table 4](#) have been used to record compliance against the conditions.

Table 4: Designations used in the compliance assessment

Status	Description
Compliant:	Achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant:	The requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable:	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

3.2 Compliance Assessment

As noted above, the EPBC Approval was varied during the reporting period on 25 November 2025. Therefore, the compliance assessment includes the approval variation, and all conditions related to EPBC 2018/8141 have been reported in full. However, since construction of Phase 2 of the project has not yet commenced, any conditions of EPBC 2018/8141 specific to the commencement of construction or operation of Phase 2 have been recorded as 'Not applicable'.

Table 5: Compliance Assessment for EPBC 2018/8141

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
Construction / Clearance limits			
1	The approval holder must not undertake any clearing or construction outside of the project area .	Compliant	For the purposes of the action, the approval has not undertaken any clearing or construction outside the wind farm site.
2	The approval holder must not construct more than 195 wind turbines and associated infrastructure in the project area	Compliant	The approval holder has not constructed more than 195 wind turbines and associated infrastructure on the wind farm site. Phase 1 of the wind farm comprises of 100 wind turbines and associated infrastructure.
2A	The approval holder must not construct more than 100 wind turbines and associated infrastructure in Phase 1 .	Compliant	Phase 1 of the wind farm comprises 100 wind turbines only.
2B	The approval holder must not construct more than 95 wind turbines and associated infrastructure in Phase 2 .	Compliant	Phase 2 of the wind farm will comprise up to 95 wind turbines only.
3	The approval holder must not clear more than:		
3 (a)	1513 hectares (ha) of Koala habitat .	Compliant	The approval holder has not cleared more than 1513 ha of Koala habitat. Clearing records indicate that a total of approximately 409.71 ha of koala habitat had been cleared since the commencement of the action.
3 (b)	17.83 ha of Greater Glider habitat .	Compliant	The approval holder has not cleared more than 17.83 ha of Greater Glider habitat. Clearing records indicate that a total of approximately 1.95 ha of Greater Glider habitat had been cleared since the commencement of the action.
3 (c)	17.83 ha of Squatter Pigeon habitat .	Compliant	The approval holder has not cleared more than 17.83 ha of Squatter Pigeon habitat. Clearing records indicate that a total of approximately 1.95 ha of Squatter Pigeon habitat had been cleared since the commencement of the action.
3 (d)	45.22 ha of Semi-evergreen Vine Thicket within the project area .	Compliant	The approval holder has not cleared more than 45.22 ha of Semi-evergreen Vine Thicket.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			Following additional detailed assessments of the vegetation on site, the EPBC-listed Semi-evergreen Vine Thicket was not confirmed on site for Phase 1. Consequently, no direct offset solution is proposed for this Matter of National Environmental Significance (MNES) for Phase 1.
Environmental Management Plan			
4	The approval holder must implement the Biodiversity Management Plan until the completion of the action .	Compliant	<p>A Biodiversity Management Plan (BMP) was submitted to the Minister for approval. The BMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Biodiversity Management Plan, Revision 3.4, dated 10 September 2021 (the BMP) (updated per condition 32 of EPBC 2018- 8141 and the Minister was notified per condition 33).</p> <p>The BMP has been implemented during the reporting period. Appendix B provided a review of the effectiveness of the BMP during the reporting period.</p>
5	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
6	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
7	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Cycad(s) Management			
8	The approval holder must not translocate any Cycad(s) otherwise than in accordance with the Biodiversity Management Plan .	Compliant	<p>The BMP, Revision 3.4, dated 10 September 2021, includes a Cycad Translocation and Management Plan (CTMP), as Appendix G.</p> <p>The CTMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Cycad Translocation and Management Plan, Revision V5, dated 8 November 2021 updated per condition 32 of EPBC 2018-8141 and the Minister was notified per condition 33.</p>

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<p>Section 2.1 of the CTMP outlines that a survey conducted in March 2021 did not identify any EPBC-listed Cycads within the Phase 1 Project footprint cleared to date. All cycads encountered to date have been identified as <i>C. terryana</i>, which is not an EPBC-listed species and thus outside the remit of the EPBC Act approval (relevant to the Queensland Department of Environment Science and Innovation protected plants approval). Refer to Appendix A and B.2 for further information.</p> <p>Should any EPBC-listed Cycads be identified within Phase 2 of the project, translocation, where required, will be undertaken in accordance with the CTMP.</p>
Threatened Bird and Bat Management			
9	To avoid and mitigate impacts to EPBC Act listed bird and bat species from turbine collision and barotrauma in Phase 1 , the approval holder must implement the Phase 1 Bird and Bat Management Plan until the completion of the action .	Compliant	The Phase 1 Bird and Bat Management Plan (BBMP) (v4.16, dated 27 August 2024) was approved by the Minister on 5 September 2024. The Phase 1 BBMP is being implemented.
10	To avoid and mitigate impacts to EPBC Act listed bird and bat species from turbine collision and barotrauma in Phase 2 , the approval holder must submit a Bird and Bat Management Plan (BBMP) for Phase 2 (Phase 2 BBMP) to the department for the Minister's approval.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval. The construction of Phase 2 of the Project had not commenced during the reporting period.
10A	The approval holder must not commence commissioning in Phase 2 unless the Minister has approved the Phase 2 BBMP in writing.	Not applicable	The approval holder had not commenced construction or commissioning in Phase 2 of the Project during the reporting period.
11	The Phase 2 BBMP submitted for the Minister's approval must meet the requirements specified in Attachment N.	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval.
11A	The approval holder must implement the Phase 2 BBMP approved by the Minister from commencement of commissioning in Phase 2 until the completion of the action .	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval. The construction of Phase 2 of the Project had not commenced during the reporting period.
11B	At the same time that the approval holder submits the Phase 2 BBMP to the department , the approval holder must also submit to the department for the Minister's approval, a revised version of the	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	Phase 1 Bird and Bat Management Plan that meets the requirements of condition 11C of this approval.		
11C	<p>The revised Phase 1 Bird and Bat Management Plan submitted for the Minister's approval in accordance with condition 11B of this approval, must:</p> <ul style="list-style-type: none"> a. align the post-commissioning fatality monitoring and adaptive management in Phase 1 with that set out in the BBMP for Phase 2; b. specify and statistically justify the site-specific survey effort at temporal and spatial resolutions (study duration, turbine sample, search interval, search plot, transect width), that will be implemented post-commissioning in the project area, for EPBC Act listed bird and bat species; c. specify and statistically justify the effort required to undertake site-specific carcass detectability trials, including the timing and frequency of searcher efficiency and carcass persistence trials, as well as corrections of unsearched areas (i.e. density weighted proportion analysis) to accurately correct for bias in calculating annual mortality estimates; d. include details of requirements for DNA testing of carcasses that cannot be otherwise identified by a suitably qualified bird and bat ecologist as not being an EPBC Act listed bird and bat species; e. provide details of the methodology, data input/output and results of all statistical analyses underlying the monitoring program, including the statistically justified survey effort required across Phase 1 and species-specific annual mortality estimates; f. include a peer-review of the statistical analyses and results of the post-commissioning fatality monitoring program by an independent suitably qualified statistician; and g. include an adaptive management framework that: <ul style="list-style-type: none"> i. incorporates site-specific data collected through the post-commissioning fatality monitoring program; 	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> ii. details adaptive avoidance and mitigation measures; iii. includes a table of species-specific trigger levels and corrective actions that will be implemented if those triggers are exceeded, including but not limited to providing environmental offsets in accordance with the Environmental Offsets Policy; and iv. detail a process for the periodic review of the post-commissioning fatality monitoring, impact avoidance and mitigation measures, and corrective actions. 		
11D	<p>Following submission of a revised Phase 1 Bird and Bat Management Plan, if the Minister makes a written request to the approval holder to make specified revisions to the Phase 1 Bird and Bat Management Plan, the approval holder must revise the Phase 1 Bird and Bat Management Plan and re-submit the revised Phase 1 Bird and Bat Management Plan to the department in accordance with any such request.</p>	Not applicable	A Bird and Bat Management Plan for Phase 2 has not yet been submitted to the department for Minister's approval, and therefore a revised Phase 1 BBMP has not been submitted yet either.
12	Revoked.	Not applicable	
12A	<p>In the event any species-specific trigger level for EPBC Act listed bird and bat species specified in the Phase 1 Bird and Bat Management Plan or any BBMP approved by the Minister, is exceeded, the approval holder must:</p> <ul style="list-style-type: none"> a. notify the department of the exceedance as an incident in accordance with condition 26 of this approval; and b. publish on the website and submit to the department, a report that details the findings of a review of the following by an independent suitably qualified expert over the 12 month period commencing no later than 1 month after the detection of the exceedance: <ul style="list-style-type: none"> i. the utilisation of the project area by the EPBC Act listed threatened bird and bat species relevant to the exceeded trigger level; and ii. the efficacy and implementation of impact avoidance, mitigation and management measures, and the adaptive 	Not applicable	No species-specific trigger levels for EPBC Act listed threatened bird and bat species specified in the Phase 1 BBMP have been reached or exceeded.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	management frameworks detailed in all BBMPs approved by the Minister		
12B	Each report required under condition 12A of this approval must: <ul style="list-style-type: none"> a. be prepared by an independent suitably qualified expert; b. be published on the website and submitted to the department within 15 months of notifying the department of the relevant species-specific trigger level exceedance; c. remain published on the website until the expiry of this approval; d. include a summary of the review findings; e. list the key recommendations (if any) made by the independent suitably qualified expert to reduce the likelihood of future trigger level exceedance; and f. include a statement made by the approval holder as to which of the recommendations it will accept, and how and by when the approval holder will act on each of the accepted recommendations. 	Not applicable	As noted at Condition 12A above, no species-specific trigger levels have been exceeded.
13	Revoked.	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Offsets			
14	To compensate for the impacts of clearing the approval holder must submit an Offset Strategy for the written approval of the Minister . The action must not commence until the Offset Strategy has been approved by the Minister . If the Minister approves the Offset Strategy then the approved Offset Strategy must be implemented. The Offset Strategy must be prepared by a suitably qualified person in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines . The Offset Strategy must: <ul style="list-style-type: none"> a. Propose an offset package, including potential offset sites, in accordance with the EPBC Act Environmental Offsets Policy, to compensate for the total clearing of the following within each Phase: 	Compliant	An Offset Strategy (version 2.8, dated 16 December 2020) was prepared and submitted to the Minister for approval. The Offset Strategy was prepared in accordance with the EPBC Act Environmental Offsets Policy and Environmental Management Plan Guidelines. The Offset Strategy was prepared by suitably qualified persons from NGH Environmental, Green Tape Solutions and Nature Advisory. The persons and their qualifications are documented in Section 1.1.1 of the Offset Strategy. The Minister provided written approval on 23 December 2020, prior to the commencement of the action. The offset strategy:

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> i. Koala habitat; ii. Greater Glider habitat; and iii. Semi-evergreen Vine Thicket. <ul style="list-style-type: none"> b. Propose measures for the long term protection and management of offset sites. c. Proposed a timeline and legal mechanism for securing the offset sites to meet the offset requirement in Condition 17; and d. determine and justify trigger levels for the requirement to provide an offset for significant residual impacts on EPBC Act listed bird and bat species. 		<ul style="list-style-type: none"> a. Contains a proposed offset package, including potential offset sites (Section 3). b. Proposes measures for the long term protection and management of offset sites (Sections 2.9.1 and 4.1). c. Proposes details of the legal offset mechanism (Section 3.2) and proposes the estimated timeframe for legally securing the offsets (Table 3-3). d. Defines the trigger levels to provide an offset for significant residual impacts on EPBC Act listed threatened bird and bat species (Section 2.11.1).
15	<p>To compensate for the residual significant impacts of the action on Koala habitat, Greater Glider habitat and Semi-evergreen Vine Thicket, the approval holder must submit to the department for the Minister's approval an Offset Management Plan (OMP) for each Phase.</p> <p>Note: The approval holder may submit a combined OMP for Phase 1 and Phase 2 to the department for the Minister's approval.</p>	Compliant	<p>A proposed Offset Management Plan (OMP) was originally submitted to the Minister on 3 March 2023, within 12 months of commencing the action.</p> <p>A revised Phase 1 OMP (v2.0) was submitted to the Department on 15 March 2024.</p> <p>On 5 September 2024, EPBC 2018/8141 was varied to reflect the phased delivery of the project across 2 Phases. This included a variation to Condition 15 to enable an OMP to be prepared for each Phase.</p> <p>Subsequently, a revised Phase 1 OMP (v3.2) was submitted to the Department on 31 January 2025, to address comments previously received from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024).</p> <p>Comments from the Department were received on 21 November 2025 including the need for additional assessments to be undertaken.</p> <p>At the end of the reporting period, the revised Phase 1 OMP is yet to be resubmitted to the Department for approval.</p> <p>A Phase 2 OMP has not yet been submitted to the department.</p>

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
15A	The approval holder must submit the OMP for Phase 1 to the department for the Minister's approval within 12-months of commencement of the action.	Compliant	As noted above, an OMP was originally submitted to the Department on 3 March 2023 - within 12 months of commencement of the action (7 March 2022).
15B	At the time of submitting an OMP to the department the approval holder must also submit shapefiles and offset attributes for the offset sites relevant to that OMP.	Compliant	The submission of the Phase 1 OMP (v3.2) was accompanied by shapefiles and offset attributes.
15C	Following submission of an OMP, if the Minister makes a written request to the approval holder to make specified revisions to the OMP, the approval holder must revise the OMP and re-submit the revised OMP to the department in accordance with any such request.	Compliant	On 21 November 2025, the Minister's comments on the Phase 1 OMP (v3.2) submitted on the 21 January 2025 were received and a revised Phase 1 OMP (v3.3) is being prepared.
15D	The approval holder must not commence Phase 2 unless and until the Minister has approved the OMP for Phase 2 or a combined OMP for Phase 1 and Phase 2 in writing.	Compliant	As at the end of the reporting period, the approval holder had not undertaken any clearing within Phase 2. Construction of Phase 2 of the Project had not commenced during the reporting period.
15E	Each OMP submitted to the department for the Minister's approval must:		
15E (a)	be prepared by a suitably qualified ecologist ;	Compliant	The Phase 1 OMP (v3.2) has been prepared by suitably qualified ecologists (refer to Section 1.5 of the Phase 1 OMP).
15E (b)	be consistent with the Environmental Management Plan Guidelines, EPBC Act Environmental Offset Policy and the Offset Strategy approved by the Minister ;	Compliant	<p>The Phase 1 OMP (v3.2) is consistent with the Environmental Management Plan Guidelines (refer to Section 2.3 and Table 5). The Phase 1 OMP (v3.2) is broadly consistent with the Offset Strategy (refer to section 1.4) but is further developed and refined. Necessarily, the offset proposed in OMP v3.2 reflects changes in circumstances since the preparation and approval of the Offset Strategy, including, but not limited to:</p> <ul style="list-style-type: none"> • Impact avoidance measures adopted during construction; • Staged project delivery; • A variation to the conditions of EPBC 2018/8141 in September 2024; • Outcomes of further field investigations; • Selection of the final and most appropriate offset areas secured by the approval holder;

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<ul style="list-style-type: none"> Measures adopted to address comments provided by DCCEEW through their reviews of the document; and The progression of time since Offset Strategy approval.
15E (c)	include a summary of the impacts in that Phase that will be compensated for by the offset site(s), including the area and habitat quality of habitats for Koala, Greater Glider and/or Semi-evergreen Vine Thicket cleared in that Phase ;	Compliant	The Phase 1 OMP (v3.2) includes a summary of the final impacts associated with Phase 1 (refer to Sections 1.3 and 3).
15E (d)	include a description and map that clearly define the location and boundaries of the proposed offset site(s) for that Phase ;	Compliant	The Phase 1 OMP (v3.2) includes a description and a map defining the location and boundaries of the Phase 1 Offset Area (refer to Section 4 and Figure 3).
15E (e)	include an assessment (a baseline assessment) of the extent and habitat quality of the habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site(s);	Compliant	The Phase 1 OMP (v3.2) addresses this requirement in Section 5 and Appendix 1.
15E (f)	detail the timing and legal mechanism for securing the offset site(s);	Compliant	The Phase 1 OMP (v3.2) includes details of the legal mechanism (Section 14).
15E (g)	describe the current condition (prior to the proposed management activities) of the offset site(s), including existing vegetation (the baseline condition);	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 4.2 and Table 8.
15E (h)	detail offset completion criteria derived from the habitat quality used to demonstrate achievement of the ecological benefits for each protected matter within the offset site(s) that will be: <ul style="list-style-type: none"> i. achieved in accordance with the timeframes specified in the Offset Strategy approved by the Minister; and ii. maintained or improved for the period of effect of this approval; 	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 13.
15E (i)	describe how habitat availability and connectivity for Koala, Greater Glider and Semi-evergreen Vine Thicket will be improved;	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 4.5.
15E (j)	detail timebound and measurable interim performance criteria, derived from completion criteria, that when achieved demonstrate progress toward achieving completion criteria;	Compliant	The Phase 1 OMP (v3.2) addresses this requirement throughout Section 8 (Management Actions).

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
15E (k)	<p>detail management measures, including the timeframes and circumstances for implementing those measures to:</p> <ul style="list-style-type: none"> i. achieve interim performance and offset completion criteria; ii. ensure no reduction in the extent and habitat quality of the habitat for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site(s) from the baseline assessment; iii. improve habitat availability and connectivity for Koala, Greater Glider and Semi-evergreen Vine Thicket; and iv. protect habitats for Koala, Greater Glider and Semi-evergreen Vine Thicket on the offset site from direct threats and threatening processes consistent with relevant recovery plans, threat abatement plans and conservation advices; 	Compliant	The Phase 1 OMP (v3.2) addresses these requirements (refer to Section 8 for performance criteria associated with each management actions and refer to Section 13 for completion criteria).
15E (l)	<p>detail the nature, timing and frequency of monitoring to demonstrate:</p> <ul style="list-style-type: none"> i. progress against achieving interim performance and offset completion criteria; ii. the maintenance of completion criteria once achieved; iii. changes to the extent, habitat quality, habitat availability and habitat connectivity within the offset site(s); and iv. demonstrate the efficacy of management measures; 	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Sections 8 and 12.
15E (m)	<p>detail feasible and effective corrective actions, including timeframes and circumstances for implementing those actions, that will be implemented in the event:</p> <ul style="list-style-type: none"> i. the extent or habitat quality of habitats for Koala, Greater Glider and/or Semi-evergreen Vine Thicket decrease(s) from the baseline assessment; and ii. interim performance targets have not been, or are unlikely to be, achieved; 	Compliant	The Phase 1 OMP (v3.2) addresses these requirements within Section 8.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
15E (n)	<p>include a risk management strategy that includes:</p> <ul style="list-style-type: none"> i. an assessment of the events or circumstances (risk event(s)) that may prejudice attainment and maintenance of the completion criteria; ii. a risk rating for each identified risk event based on the likelihood and consequence of occurrence; iii. measures that will mitigate identified risk events (mitigation measures) by reducing the likelihood and/or consequence of each risk event; iv. the timeframes and circumstances for implementing mitigation measures; v. a rating of the residual risk for each risk event, based on the likelihood and consequence of occurrence, assuming mitigation measures are implemented; 	Compliant	The Phase 1 OMP (v3.2) incorporates a detailed risk assessment within Section 10.
15E (o)	include a table comprised of the time-bound management actions, monitoring activities and corrective actions specified in the OMP and a reference to where those actions and activities are detailed in the OMP.	Compliant	The Phase 1 OMP (v3.2) addresses this requirement within Section 8.
16	The approval holder must commence implementing each OMP (the OMP for Phase 1 and the OMP for Phase 2 , or a combined Phase 1 and Phase 2 OMP), as and from when the Minister approves it in writing and continue to implement each OMP until the expiry of this approval.	Not applicable	<p>A revised Phase 1 OMP (v3.2) was submitted to the Minister for approval on 31 January 2025.</p> <p>On 21 November 2025, the Minister's comments on the Phase 1 OMP (v3.2) submitted on the 21 January 2025 were received and a revised Phase 1 OMP (v3.3) is being prepared, and therefore the Phase 1 OMP is not yet being implemented.</p>
17	The approval holder must legally secure each offset sites specified in an approved OMP within 2 years of the Minister approving the OMP in which that offset site is specified.	Not applicable	<p>Legal security is outlined in Section 14 of the Phase 1 OMP (v3.2).</p> <p>On 21 November 2025, the Minister's comments on the Phase 1 OMP (v3.2) submitted on the 21 January 2025 were received and a revised Phase 1 OMP (v3.3) is being prepared, and therefore the offset sites have not yet been legally secured.</p>

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
17A	Within 18 months following commissioning of Phase 1 , the approval holder must submit a Bird and Bat Offset Strategy (BBOS) for all Phases to the department for the Minister's approval.	Compliant	The Bird and Bat Offset Strategy (BBOS) for all Phases was submitted to the Minister on the 23 February 2026. Minister Approval has not been received during the reporting period.
17B	The BBOS submitted for the Minister's approval must: <ul style="list-style-type: none"> a. propose environmental offsets that will be delivered in the event a species-specific trigger level specified in a BBMP approved by the Minister is met or exceeded; b. specify the mechanism and responsible parties for the delivery of each of the proposed environmental offsets; c. demonstrate how each of the proposed environmental offsets are consistent with the Environmental Offsets Policy; d. specify what the outcome of each environmental offset is and the timeframe in which each outcome will be delivered; e. propose feasible and effective contingencies, to be implemented in the event any outcome of an environmental offset is not achieved within the specified timeframe; f. detail the benefit of each proposed environmental offset and its outcome to the conservation of each EPBC Act listed threatened bird and bat species; and g. detail a program to periodically publish on the website and report to the department, information regarding the implementation of each proposed environmental offset. 	Complaint	The BBOS for all Phases was submitted to the Minister on the 23 February 2026. The submitted BBOS was written to include the requirements of this condition. Minister Approval has not been received during the reporting period.
17C	Following submission of the BBOS, if the Minister makes a written request to the approval holder to make specified revisions to the BBOS, the approval holder must revise the BBOS and re-submit the revised BBOS to the department in accordance with any such request.	Not applicable	The Bird and Bat Offset Strategy (BBOS) for all Phases was submitted to the Minister on the 23 February 2026. Minister Approval has not been received during the reporting period. No requests received by the Minister during this reporting period.
17D	The approval holder must implement the BBOS approved by the Minister , from within 20 business days of the Minister's approval of the BBOS and until the expiry of this approval.	Not applicable	The Bird and Bat Offset Strategy (BBOS) for all Phases was submitted to the Minister on the 23 February 2026. Minister Approval has not been received during the reporting period. Therefore, the BBOS has not yet been implemented.
17E	In the event a species-specific trigger level specified in a BBMP approved by the Minister is met or exceeded, the approval holder	Not applicable	The Bird and Bat Offset Strategy (BBOS) for all Phases was submitted to the Minister on the 23 February 2026.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	must achieve the environmental offset outcomes for the respective species in accordance with the timeframes specified in the BBOS approved by the Minister .		Minister Approval has not been received during the reporting period. Therefore, the BBOS has not yet been implemented.
Notification of date of commencement of the action			
18	The approval holder must notify the Department in writing of the date of commencement of the action, at Phase 1 and Phase 2 , within 10 business days after the date of commencement of the action, at Phase 1 and Phase 2 .	Compliant	On 16 March 2022, the approval holder wrote to the Department to provide formal notification that the action commenced on 7 March 2022. The written notification was provided seven (7) business days after the date of commencement of the action. On 29 March 2022, the Department provided a letter response which acknowledged receipt of the notification in accordance with Condition 18 of the approval.
19	The approval holder must notify the Department electronically of the date of commissioning in each Phase within 10 business days following the date of commissioning in each Phase	Compliant	Commissioning of Phase 1 commenced on 5 October 2024. Notification of commissioning of Phase 1 was provided to the Department on 16 October 2024, eight (8) business days following the date of commissioning. The Department replied with acknowledgement email on 17 October 2024.
20	Revoked	Not applicable	This condition was revoked in the EPBC Approval variation dated 5 September 2024.
Compliance records			
21	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records .	Compliant	The approval holder maintains accurate and complete compliance records and documents the procedure for recording and storing compliance records.
22	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act , and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.	Compliant	No further requests during the reporting period.
Preparation and publication of plans			

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
23	The approval holder must:		
23 (a)	Submit plans electronically to the Department for approval by the Minister .	Compliant	<p>The plans have been submitted electronically to the Department for approval by the Minister.</p> <p>The BMP (Condition 4) was submitted electronically, and Ministers approval was received on 12 June 2020. The BMP was revised 10 September 2021 per condition 32, and the Minister was notified per condition 33.</p> <p>The CTMP (Condition 8) was submitted electronically, and Minister's approval was received on 12 June 2020. The CTMP was revised 8 November 2021 per condition 32, and the Minister was notified per condition 33.</p> <p>The BBMP (Condition 9) was first submitted electronically in December 2020 for approval by the Minister and resubmitted 3 March 2023. The final version was submitted to the Department electronically on 27 August 2024, Ministers approval was received on 6 September 2024.</p> <p>The Offset Strategy (version 2.8), dated 16 December 2020 was submitted electronically to the Minister for approval. The Offset Strategy was approved by the Minister on 23 December 2020.</p> <p>The OMP (Condition 15) was submitted electronically on 3 March 2023 for approval by the Minister. A revised OMP (v3.2) was submitted electronically on 31 January 2025.</p>
23 (b)	Publish each plan on the website within 20 business days of the date the plan is approved by the Minister , or as relevant to the biodiversity management plan , within 20 business days of the date a revised biodiversity management plan is submitted to the Minister , unless otherwise agreed to in writing by the Minister .	Compliant	<p>The BMP (Condition 4), CTMP as an appendix to the BMP (Condition 8), Offset Strategy (Condition 14) and BBMP (condition 9) have been published on the website (within 20 business days of the Minister's approval date).</p> <p>Approval of the OMP, required by Condition 15, has not yet been received.</p> <p>Approval of the BBOS, required by Condition 17A, has not yet been received</p>
23 (c)	Exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public.	Compliant	Sensitive ecological data has not been included on the plans published on the website.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
23 (d)	Keep plans published on the website until the end date of this approval.	Compliant	The approved plans continue to remain published on the website.
24	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan or conditions of this approval, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plan .	Compliant	Where required by a Plan, data has been submitted electronically to the Department in accordance with the requirements of the Plan.
Annual compliance reporting			
25	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period) .	Compliant	A compliance report was prepared for the 12-month ACR period, being 7 March 2024 to 6 March 2025. This report is prepared for the 12-month ACR period, being 7 March 2025 to 6 March 2026.
25A	The approval holder must include the following information in all compliance reports prepared for each ACR period following commissioning :		
25A (a)	a count of all turbine strikes detected for EPBC Act listed bird and bat species in the project area and in each Phase , during the ACR period , and a compilation and analyses of information in relation to each turbine strike regarding: <ul style="list-style-type: none"> i. the method of detection; ii. the species detected; iii. prevailing environmental/meteorological conditions at the estimated time of the collision; and iv. likely factors in the presence of the EPBC Act listed bird and bat species leading to the collision. 	Not applicable	Zero (0) turbine strikes were detected for EPBC Act listed bird or bat species during the reporting period.
25A (b)	estimations of annual mortality and injury rates for each EPBC Act listed bird and bat species , calculated in accordance with the BBMP(s) for each Phase approved by the Minister .	Not applicable	No estimations of annual mortality were required to be undertaken during the ACR period ending 6 March 2025, in accordance with the Phase 1 BBMP. It is noted that:

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<ul style="list-style-type: none"> no EPBC Act listed threatened bird and bat species were detected during the reporting period; no mortality thresholds were reached or exceeded during the reporting period; no BBMP annual monitoring reports have been prepared, as the project has not completed the first year of full carcass search program implementation (refer section 9.1.1 of the BBMP).
25A (c)	species occurrence records in accordance with the <i>Guidelines for biological survey and mapped data</i> , Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing; and	Not applicable	No EPBC Act listed threatened bird or bat species were detected during the reporting period.
25A (d)	an evaluation of effectiveness of the measures implemented during the reporting period to avoid and mitigate mortality and/or injury to EPBC Act listed bird and bat species .	Compliant	Appendix C contains a review of the effectiveness of the BBMP during the reporting period, to avoid and mitigate mortality and/or injury to EPBC Act listed threatened bird and bat species.
25B	<p>The approval holder must ensure each compliance report includes:</p> <ol style="list-style-type: none"> accurate and complete details of compliance and any non-compliance with: <ol style="list-style-type: none"> each condition attached to this approval decision, and all commitments made in each plan a schedule of all plans in effect in relation to these conditions during the ACR period accurate and complete details of how each plan was implemented during the ACR period, and if any incident occurred, accurate and complete details of each incident 	Compliant	<p>This Annual Compliance Report covers the ACR period 7 March 2025 to 6 March 2026.</p> <p>During the reporting period, there has been no non-compliances during the ACR period.</p> <p>Appendix A contains a schedule of all plans in effect during the ACR period.</p> <p>Appendix B provides a review of the effectiveness of the BMP implementation during the reporting period.</p> <p>Appendix C provides a review of the effectiveness of the BBMP implementation during the reporting period.</p> <p>No incidents were recorded during the ACR period ending 6 March 2026.</p>
25C	The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	This compliance report, covering the period 7 March 2025 – 6 March 2026, has been prepared in accordance with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
25D	The approval holder must, within 20 business days following the end of each ACR period , in a format that is easily accessible and downloadable, publish on the website :	Complaint	The compliance report submitted on 4 June 2024, prior to the variation of the EPBC Approval 2018/8141 and in accordance with the requirements of Condition 25 in effect at the time.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
			<p>The 2025 compliance report was published on the website on the 3 April 2025, within 20 business days of the end of the ACR period (ending 6 March 2025).</p> <p>This compliance report will be published on the website within 20 business days of the end of the ACR period (ending 6 March 2026).</p>
25D (a)	each compliance report ; and		<p>This and all previous compliance reports are published on the project's website:</p> <p>https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm</p>
25D (b)	a shapefile showing all clearing of protected matters , and their habitat, undertaken within the ACR period .	Compliant	<p>A zipped shapefile (.zip) is available on the project's website which shows the clearing of protected matters within Phase 1 of the project.</p> <p>No clearing of protected matters undertaken during this ACR period ending 6 March 2026.</p> <p>https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm</p>
25E	The approval holder must:		
25E (a)	Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public.	Not applicable	Sensitive ecological data has not been included in the annual compliance report, for this ACR period (ending 6 March 2026).
25E (b)	If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	Sensitive ecological data has not been included in the annual compliance report, for this ACR period (ending 6 March 2026).
25E (c)	If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version	Not applicable	Sensitive ecological data has not been included in the annual compliance report, for this ACR period (ending 6 March 2026).

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	published on the website or otherwise provided to a member of the public.		
25F	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website . In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website .	Compliant	On 7 April 2025, the Department was notified by email that the previous compliance report had been published on the website. The email notification was made to the Department 2 business days following publication of the report on the website.
25G	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report is published and until the expiry date of this approval. Note: Compliance reports may be published on the department's website.	Compliant	The previous compliance reports continue to remain published on the website: https://www.squadronenergy.com/our-projects/clarke-creek-wind-farm
Reporting non-compliance			
26	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident , or potential or actual non-compliance with these conditions or commitments made in a plan . The approval holder must specify in each notification: <ul style="list-style-type: none"> a. any condition or commitment made in a plan which has not been or may have been not complied with; b. a short description of the incident or non-compliance; and c. the location (if applicable, including co-ordinates), date and time of the incident or non-compliance. 	Compliant	No incidents or non-compliances associated with the EPBC conditions were recorded or notified during the report period.
27	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident , or potential or actual non-compliance with these conditions or commitments made in a plan , the details of that incident or non-compliance. The approval holder must specify: <ul style="list-style-type: none"> a. all corrective measures and investigations which the approval holder has already taken in respect of the incident or non-compliance; 	Compliant	No incidents or non-compliances associated with the EPBC conditions were recorded or notified during the report period.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<ul style="list-style-type: none"> b. the potential impacts of the incident or non-compliance; c. the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident or non-compliance; and d. any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident or non-compliance, and/or to address its consequences. 		
Independent audit			
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period .	Not applicable	The audit period is defined in EPBC 2018/8141 as: means each 5-year period following the commencement of the action until the expiry of this approval, unless otherwise specified in writing by the Minister. Accordingly, the first audit period covers the period 7 March 2022 – 6 March 2027.
29	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30A	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30B	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period , or as otherwise directed by the Minister in writing.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30C	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
30D	The approval holder must publish each audit report on the website , in a format that is easily accessible and downloadable, within 10 business days of the date of the department agrees to the audit report in writing.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30E	The approval holder must notify the department within 5 business days of the date the audit report is published on the website . In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website .	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
30F	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	The first audit period covers the period 7 March 2022 – 6 March 2027. As such, this Condition was not applicable during the ACR period ending 6 March 2026.
Revision of action management plans			
31	The approval holder may, at any time, apply to the Minister for a variation to a plan by the Minister as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act .	Not applicable	No approved action management plans were revised in accordance with this condition, during the reporting period.
32	The approval holder may choose to revise the Biodiversity Management Plan , without submitting it for approval under section 143A of the EPBC Act , if the taking of the action in accordance with the revised Biodiversity Management Plan would not be likely to have a new or increased impact .	Compliant	<p>The BMP was revised under this condition, as taking the action in accordance with the revised management plan would not be likely to have a new or increased impact. This revision was provided to Department on the 4 December 2025.</p> <p>The Department responded on the 17 December 2025, stating that it has commenced a review of the submitted BMP and is forming a position on whether there is no New or increased impact resulting from the revision. The Department asked for the current version of the BMP to continue to be implemented until their review is completed.</p> <p>This remains ongoing, as of the end of the ACR period.</p>
33	If the approval holder makes the choice under condition 32 to revise the Biodiversity Management Plan without submitting it for approval, the approval holder must:		

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
33 (a)	<p>notify the Department in writing that the Biodiversity Management Plan has been revised and provide the Department with:</p> <ul style="list-style-type: none"> i. an electronic copy of the revised Biodiversity Management Plan; ii. an electronic copy of the revised Biodiversity Management Plan marked up with track changes to show the differences between the current Biodiversity Management Plan and the revised Biodiversity Management Plan; iii. an explanation of the differences between current Biodiversity Management Plan and the revised Biodiversity Management Plan; iv. the reasons the approval holder considers that taking the action in accordance with the revised Biodiversity Management Plan would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the revised Biodiversity Management Plan, being at least 20 business days after the date of providing notice of the revision of the Biodiversity Management Plan, or a date agreed to in writing with the Department. 	Compliant	<p>An email was sent to the Department on 4 December 2025, providing an electronic copy of the revised BMP, a marked-up version, an explanation of the differences, and the rationale for submitting it under condition 32.</p> <p>The revised BMP was scheduled to be implemented on 6 January 2026, which is 20 business days after it was issued to the Department. However, the Department responded on the 17 December 2025, stating it has commenced a review of the submitted BMP and is forming a position on whether there is no New or increased impact resulting from the revision. The Department asked for the current version of the BMP to continue to be implemented until their review is completed.</p>
33 (b)	Subject to condition 35, implement the revised Biodiversity Management Plan from the implementation date.	Not applicable	<p>The Department has paused implementation of the revised BMP pending review, while the approved version continues to be implemented.</p> <p>This remains ongoing, as of the end of the ACR period.</p>
34	The approval holder may revoke its choice to implement a revised Biodiversity Management Plan under condition 32 at any time by giving written notice to the department . If the approval holder revokes the choice under condition 32, the approval holder must implement the previous version of the Biodiversity Management Plan .	Not applicable	The approval holder has not revoked a revised management plan.
35	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised	Not applicable	No notice was received during the reporting period.

Condition Number / reference	Condition	Is the project compliant with this condition?	Comments
	<p>Biodiversity Management Plan would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none"> a. condition 32 does not apply, or ceases to apply, in relation to the revised Biodiversity Management Plan; and b. the approval holder must implement the version of the Biodiversity Management Plan specified by the Minister in the notice. 		
36	<p>At the time of giving the notice under condition 35, the Minister may also notify that for a specified period of time, condition 32 does not apply.</p> <p>Note: conditions 32, 33, 34 and 35 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval</p>	Not applicable	No notice was received during the reporting period.
Completion of the action			
37	<p>Within 20 business days after the completion of the action, and, in any event, at least 20 business days before this approval expires, the approval holder must notify the department electronically of the date of completion of the action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.</p>	Not applicable	The action is not yet completed.
38	<p>The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.</p> <p>Note: Section 145C of the EPBC Act entitles the approval holder to request an extension to the period of effect of this approval.</p>	Not applicable	The action is not yet completed.

4 New environmental risks

No new environmental risks were identified during the ACR period, ending 6 March 2026.

5 Conclusion

No non-compliances have been recorded within Error! Reference source not found. of this Annual Compliance Report.

Several of the conditions were 'not applicable' during the reporting period, due to the following factors:

- Phase 2 of the Project has not commenced construction.
- A BBMP for Phase 2 has not yet been submitted to the Minister for approval.
- No turbine strikes of EPBC Act listed bird or bat species were detected.
- The Project (and the Action) is not completed.

Appendix A Schedule of Plans

Table 6: Schedule of Plans in effect during ACR period (7 March 2025 – 6 March 2026).

CoA	Plan	Approval status	Implementation status
4	Biodiversity Management Plan (v3.4)	The BMP was approved by the Minister on 12 June 2020. The latest version being Clarke Creek Wind Farm – Biodiversity Management Plan, Revision 3.4, dated 10 September 2021 (updated per condition 32 of EPBC 2018- 8141 and the Minister was notified per condition 33).	The BMP was implemented during the reporting period. Refer to Appendix B for details of plan implementation and effectiveness during the reporting period.
8	Cycad Translocation Management Plan (v5) (BMP, Appendix G)	The CTMP is Appendix G of the BMP, Revision 3.4, dated 10 September 2021 The CTMP was approved on 12 June 2020 (EPBC 2018-8141 BMP CTMP Decision Letter), with the latest version being Clarke Creek Wind Farm – Cycad Translocation and Management Plan, Revision V5, dated 8 November 2021 (updated per condition 32 of EPBC 2018-8141 and the Minister was notified per condition 33).	The Phase 1 area was surveyed in March 2021 with no EPBC-listed cycads identified (<i>C. megacarpa</i> or <i>C. ophiolitica</i>). As such the implementation of the CTMP where it relates to EPBC Listed Cycads species is not relevant for Phase 1 of the Project as no impacts to EPBC listed cycads has occurred.
9	Threatened Bird and Bat Management Plan	The BBMP was approved by the Minister on 5 September 2024. The latest version being Clarke Creek Wind Farm – Phase 1 Bird and Bat Management Plan, Report 17047(4.16), dated 27 August 2024.	The BBMP was implemented during the reporting period. A specialist consultant (Umwelt, supported by EcoK9, and Nature Advisory) has been engaged to conduct the monitoring activities and prepare the reports in accordance with the methodology outlined in Section 4 and 9 of the BBMP. Refer to Appendix C for details of plan implementation and effectiveness during the reporting period.
14	Offset Strategy (v2.8)	The Offset Strategy was approved by the Minister on 23 December 2020. The latest version being Clarke Creek Wind Farm – Offset Strategy, revision 2.8, dated 16 December 2020.	The Offset Strategy was implemented during the reporting period. Specifically, the Offset Management Plan v3.2 has been prepared in accordance with the requirements of the Offset Strategy and was submitted to the Department for Minister's approval. Minister's comments on the Phase 1 OMP (v3.2) were received and a revised Phase 1 OMP (v3.3) is being prepared.
15	Phase 1 Offset Management Plan (in preparation)	The Phase 1 OMP was in preparation during the reporting period. The revised Phase 1 OMP (v3.2) was submitted to the Minister for approval on 31 January 2025. The OMP (v3.2) was prepared to address comments from the Department, to reflect the delivery of the project across two separate Phases, and to incorporate and address the varied conditions of approval (per the EPBC Approval variation dated 5 September 2024).	Minister approval of the Phase 1 OMP (v3.2) had not been received during the reporting period, and therefore the Phase 1 OMP (v3.2) is not yet being implemented. Minister's comments on the Phase 1 OMP (v3.2) were received and a revised Phase 1 OMP (v3.3) is being prepared.

Appendix B Review of BMP Performance Criteria and Plan Effectiveness

Table 7: Review of the BMP performance indicators and plan effectiveness.

Objectives	Performance indicators	Comment	Review of Effectiveness
No net loss of threatened Cycad individuals.	Threatened Cycads within the disturbance footprint are successfully translocated or propagated (refer to Cycad Translocation Management Plan).	<p>Section 2.1 of the CTMP outlines that a survey conducted in March 2021 did not identify any EPBC-listed Cycads within the Project footprint cleared to date.</p> <p>All cycads encountered to date have been identified as <i>C. terryana</i>, which is not an EPBC-listed species (<i>C. megacarpa</i> or <i>C. ophiolitica</i> and thus outside the remit of the EPBC Act approval (relevant to the Queensland Department of Environment Science and Innovation protected plants approval).</p> <p>As such, the implementation of the CTMP where it relates to EPBC Listed Cycads species is not relevant for Phase 1 of the Project as no impacts to EPBC listed cycads has occurred.</p>	BMP and CTMP mitigation and management measures have been effective during the reporting period.
Improve the condition and management of retained SEVT vegetation in the Project Area.	<p>Loss of SEVT will be minimised, with no more than the approved vegetation clearing amount:</p> <ul style="list-style-type: none"> 45.22 ha of SEVT (EPBC-listed) <p>Condition of the SEVT will be improved by implementing fire and pest animal management, as well as by providing a SEVT offset in accordance with the offset strategy and management plan for the Project.</p>	Following additional detailed assessments of the vegetation on site, the EPBC-listed Semi-evergreen Vine Thicket was not confirmed on site for Stages 1 & 2. Consequently, no impact occurred and therefore no direct offset solution is proposed for this Matter of National Environmental Significance (MNES).	BMP mitigation and management measures have been effective during the reporting period.
Retain viable native vegetation communities in the Project Area. Riparian vegetation is retained and restored.	No more than the approved vegetation clearing (State approval)	<p>Clearing has not exceeded the approved clearing limits specified in EPBC Approval 2018/8141.</p> <p>As detailed in this compliance report (Table 5, Condition 3), the clearing totals for Phase 1 of the project as of March 2026 are:</p> <ul style="list-style-type: none"> Koala Habitat: 409.71 ha (Clearing limit for project = 1,513 ha) 	Clearing mitigation and management measures have been effective during the reporting period.

Objectives	Performance indicators	Comment	Review of Effectiveness
		<ul style="list-style-type: none"> • Greater Glider habitat: 1.95 ha (Clearing limit for project = 17.83 ha) • Squirrel Glider Habitat: 1.95 ha (Clearing limit for project = 17.83 ha) • SEVT: 0 ha. (Clearing limit for project = 45.22 ha) <p>Clearing has not exceeded the clearing limits specified in the State Development Approval.</p>	
<p>To protect EPBC Act threatened fauna species (including Koala, Greater Glider, White-throated Needle-tail, Squatter Pigeon, and Red Goshawk) and EPBC Act threatened bird and bat species (including White-throated Needle-tail, Rainbow Bee-eater, Rufous Fantail, Fork-tailed Swift, Satin Flycatcher, Red Goshawk and Corben's Long-eared Bat).</p>	<p>No mortality or injury to EPBC (or NC) Act threatened species as a direct result of the Project.</p> <p>Alternative habitat provided for Greater Glider and in use by this species.</p>	<p>There has been no mortality or injury to EPBC Act listed threatened species as a direct result of the project.</p> <p>The approved BBMP contains measures to protect EPBC Act listed Bird and Bat species.</p> <p>There have been no signs of active hollow use by Greater Glider, and therefore no alternative habitat was required to be provided for this species.</p> <p>Clearance of Greater Glider habitat areas has been minimised.</p>	<p>BMP mitigation and management measures have been effective during the reporting period.</p>
<p>Successful rehabilitation of disturbed ground.</p>	<p>Areas of disturbed ground no longer required for operations will have at least 70% groundcover, in consideration of the local environmental conditions.</p>	<p>Progressive rehabilitation of disturbed areas has been undertaken across the site as the works have been completed. Stabilisation measures have included:</p> <ul style="list-style-type: none"> • Monitoring of established geofabric and rock rip-rap stabilisation where required to control erosion (eg in areas of concentrated surface water flow). • Some application of hydroseeding / hydromulching / hand seeding – for vegetation establishment. 	<p>BMP mitigation and management measures have been effective during the reporting period.</p>

Objectives	Performance indicators	Comment	Review of Effectiveness
		<p>Bonded fibre matrix (BFM) has been widely used on areas such as road and hardstand batters to achieve revegetation. BFM offers immediate ground cover, stabilisation, a growth medium for seed germination, and also aids with weed suppression.</p> <p>Biochar has also been widely used as an effective rehabilitation and revegetation measure. Biochar supports improved seed establishment and long-term soil regeneration, increased moisture holding capacities (drought tolerance), nutrient retention, microbial health, and soil amelioration.</p> <p>Monitoring of rehabilitation progress is ongoing.</p>	
Bushfire risk will not increase as a result of the Project.	Activities associated with the Project will not cause a bushfire.	Activities undertaken during the project have not caused a bushfire during the reporting period.	Bushfire mitigation and management measures have been effective during the reporting period.
Pest animal activity will not increase as a result of the Project.	Pest animal presence is at the same (or reduced) level as during pre-construction surveys.	There have been infrequent sightings of pest animal species on the project.	BMP mitigation and management measures have been effective during the reporting period.
No new restricted weed species introduced as a result of the Project. No new outbreaks of restricted weeds within the Project Area.	Weed species diversity and location of infestations is at the same (or reduced level) as during pre-construction surveys.	<p>Within the project footprint, weed species diversity and extent of infestation is at the same or reduced level as during pre-construction surveys.</p> <p>Weed management on the wind farm site has included:</p> <ul style="list-style-type: none"> • Mechanical removal and disposal of weeds during pre-clearing and clearing activities. • Ongoing weed monitoring during construction activities. • Follow-up weed control where required (eg. further hand or mechanical removal, spot spraying with herbicide). <p>Monitoring and control of weeds will continue.</p>	BMP mitigation and management measures have been effective during the reporting period.

Objectives	Performance indicators	Comment	Review of Effectiveness
Protected fauna will not be killed or injured as a result of the Project.	No mortality or injury to protected native fauna as a direct result of the Project.	No EPBC Act protected fauna were killed or injured as a result of the project during the reporting period.	BMP mitigation and management measures have been effective during the reporting period.
Biodiversity performance monitored and reported on.	Annual compliance report prepared for each 12- month period from construction commencement, published on the Project website within 60 business days of the relevant 12-month period.	<p>The previous annual compliance report (ACR) was prepared and published on the project website within 60 business days of the reporting period.</p> <p>The current ACR will be published on the project website within 20 business days of the end of the ACR period.</p>	BMP mitigation and management measures have been effective during the reporting period.

Appendix C Review of BBMP Objectives, Commitments and Plan Effectiveness

Table 9 sets out the objectives and commitments outlined in Section 1.4 of the approved BBMP and provides a review of the effectiveness against each commitment.

No EPBC Act listed threatened bird or bat species were detected during the reporting period. As a result, no mortalities or injuries have been recorded to date.

In accordance with the approved BBMP, the full carcass search program (per section 4.4.4 of the approved BBMP) commenced in February 2026 once all turbines were commissioned.

Table 8: Review of effectiveness of the Bird and Bat Management Plan commitments to achieve objectives

Objective	Commitment	Comment / Review of Effectiveness
Ensure the protection of EPBC Act listed threatened bird and bat species.	This will be achieved through the actions listed below in this table.	<p>No EPBC listed threatened bird or bat species were detected during the reporting period.</p> <p>No mortalities or injuries to EPBC Act listed threatened bird or bat species were detected during the reporting period.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>
To implement a monitoring program to estimate the impact of the Project on the seven at-risk birds and/or bats that can reasonably be attributed to the operation of the Project.	Carcass monitoring will be implemented in accordance with the carcass monitoring program outlined in this plan.	<p>Carcass monitoring has been implemented during the reporting period in accordance with the carcass monitoring program outlined in the BBMP, as relevant to the status of commissioning and operation of the project.</p> <p>This has included:</p> <ul style="list-style-type: none"> • Incidental carcass monitoring and reporting • Preliminary interim carcass searches continued to be implemented (refer to Section 4.4.3 of the BBMP). • Full carcass search program from February 2026 (refer to Section 4.4.4 of the BBMP).
To directly record impacts on birds and bats through a statistically-based program of carcass searches.	The carcass monitoring program has been designed to be used in accordance with the statistical analysis outlined in Appendix	As noted above, carcass monitoring has been implemented during the reporting period in accordance with the carcass monitoring program outlined in the BBMP (Section 4.4), as relevant to the status of commissioning and operation of the project.

Objective	Commitment	Comment / Review of Effectiveness
	2 to estimate annual mortality rates for birds and bats of this wind farm.	
<p>To document a decision-making framework that identifies impact triggers requiring a management response.</p>	<p>Impact triggers have been defined for both threatened and non-threatened species, along with a decision-making framework.</p>	<p>Section 5.3.1 of the approved BBMP contains a decision-making framework for threatened species impact triggers. There were no impact triggers recorded during the reporting period, and as such the decision-making framework was not required to be implemented.</p>
<p>To detail mitigation measures and related management strategies to be implemented in response to impact triggers occurring.</p>	<p>Mitigation and management measures have been defined as ongoing management actions and in response to impact triggers.</p>	<p>Section 3 of the approved BBMP contains environmental management and mitigation measures.</p> <p>Section 5 of the approved BBMP contains mitigation measures to be implemented in response to impact triggers. No impact triggers occurred during the reporting period.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>
<p>To identify matters to be addressed in periodic reports on the outcomes of monitoring, the application of the decision-making framework, mitigation measures implemented and their success.</p>	<p>Annual reports will be prepared and provided to DESI and DCCEE. In case of incidents, an incident notification and a report of corrective actions and mitigation measures will be prepared.</p>	<p>In accordance with Section 9 of the approved BBMP, the first annual report will be prepared and submitted to DESI and DCCEE within three months of the completion of the first year of full carcass search implementation after Phase 1 of the project becomes fully operational.</p> <p>As the first year of full carcass search monitoring has not been completed, annual reporting has not yet been undertaken.</p> <p>This Table presents a review of the effectiveness of the BBMP commitments implemented during the ACR period ending 6 March 2025.</p> <p>The absence of EPBC Act listed bird and bat detections suggests that the BBMP commitments and actions have been effective in mitigating potential impacts during the reporting period.</p>

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We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

