

Spicers Creek Wind Farm


Environmental Management Strategy SSD 41134610

19 March 2026



Final

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Status
1	05/12/2025	Draft	Z. Jokadar	C. Somerville		Submit for DPHI review
2	19/03/2026	Final/Issued	Z. Jokadar	C. Somerville		For DPHI approval

Confidentiality

This document contains proprietary and confidential information, which is provided on a commercial in confidence basis. It may not be reproduced or provided in any manner to any third party without the consent of Squadron Energy Pty Ltd.

© Copyright Squadron Energy 2026. This work and the information contained in it are the copyright of Squadron Energy Pty Ltd. No part of this document may be reprinted or reproduced without the consent of Squadron Energy Pty Ltd.

Disclaimer

Whilst every effort has been made to ensure the accuracy of this information, the publisher accepts no responsibility for any discrepancies and omissions that may be contained herein.

Contents

1	Introduction	1
1.1	Project Overview	1
1.2	Purpose and Objective of this EMS.....	1
1.3	Project Staging	1
1.4	Application of this EMS	2
2	Environmental Management Framework	4
2.1	Environmental Management System	4
2.2	Environmental Policy	4
2.3	Environmental Plans.....	5
	2.3.1 Environmental Strategies, Plans and Programs	5
	2.3.2 Contractor Environmental Management Plans	6
3	Statutory Approvals	8
3.1	Overview of Statutory Approvals	8
3.2	NSW Development Consent SSD-41134610.....	8
3.3	EPBC Approval 2022/09387	9
3.4	NSW EPA Environment Protection Licence (EPL 22077).....	9
3.5	Additional Approvals, Permits and Licences	10
4	Implementation and Operation	12
4.1	Structure and Responsibility.....	12
4.2	Training, Awareness and Competence	15
	4.2.1 HSEQ Induction	15
	4.2.2 Pre-Start Meetings.....	15
	4.2.3 Toolbox Talks.....	15
	4.2.4 Environmental Awareness Training.....	15
4.3	Communication.....	16
	4.3.1 Community Consultation	16
	4.3.2 Information Sharing	16
4.4	Complaints.....	17
	4.4.1 Receiving Complaints.....	17
	4.4.2 Complaint Handling and Response.....	17
	4.4.3 Dispute Resolution.....	18
4.5	Incident and Emergency Response	18
	4.5.1 Response to an Incident under the Development Consent	18
	4.5.2 Response to an Incident Under EPBC Approval	19
	4.5.3 Response to Emergencies	20
4.6	Risk Management.....	22
5	Measurement and Evaluation	23
5.1	Environmental Inspections	23
5.2	Environmental Auditing	23
	5.2.1 Independent Environmental Audits Requirements	23
	5.2.2 Independent Audits Requirements of EPBC Approval	23
	5.2.3 Internal Project Audits.....	24
5.3	Environmental Monitoring Summary	24
5.4	Reporting and Notification Obligations	33
5.5	Non-Compliance and Corrective and Preventative Action	38
	5.5.1 Non-Compliance Identification and Investigation	38

5.5.2	Notification of Non-Compliance to NSW Planning Secretary (DPHI)	38
5.5.3	Notification of Non-Compliance to Commonwealth Department (AG DCCEEW)	38
5.5.4	Compliance Tracking Matrix	39
6	Review Management	40
7	References	41
Appendix A Squadron Energy Environmental Policy		
Appendix B Additional Compliance Requirements		
Appendix C Approval for staging of plans		

Figures

Figure 1.1:	Approved Project Layout	3
Figure 2.1:	ISO 14001:2015 Plan-Do-Check-Act extract	4
Figure 2.2	Relationship between SCWF and Contractor Management Plans	7

Tables

Table 1.1:	Project Staging Approach	2
Table 3.1	Requirements of Development Consent Condition C1	8
Table 3.2:	Additional Approvals, Permits and Licences	10
Table 3.3:	Approvals, Permits and Licences not required	10
Table 4.1:	Key Roles and Responsibilities	12
Table 4.2:	Emergency Response Plans Relevant to the Project	20
Table 5.1:	Summary of the Monitoring Obligations Required by the Development Consent	25
Table 5.2:	Reporting and Notification Obligations – Development Consent, EPBC Approval and EPL 22077	33

Abbreviations

Term	Definition
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information Management System
AG DCCEEW	Australian Government Department of Climate Change, Energy, the Environment and Water
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	Biodiversity Conservation Act 2016 (NSW)
BMP	Biodiversity Management Plan
CEMP	Construction Environmental Management Plan
DPE	Department of Planning and Environment (now referred to as Department of Planning, Housing and Infrastructure)
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	The Environment Impact Statement for Spicers Creek Wind Farm dated July 2023, the Submissions Report dated December 2023
EMS	Environmental Management Strategy
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
NSW EPA	Environment Protection Authority an entity under the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW)
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)
EPL	Environment Protection Licence
HMP	Heritage Management Plan
HSEQ	Health, Safety, Environment and Quality
LGA	Local Government Area
OSOM	Over Size, Over Mass vehicle; vehicle configuration which requires a permit from the National Heavy Vehicle Regulator.
PIRMP	Pollution Incident Response Management Plan
SCWF	Spicers Creek Wind Farm , the Project
SQE	Squadron Energy
TMP	Traffic Management Plan
WTG	Wind Turbine Generator

Key Terms

Term	Definition
Ancillary infrastructure	All project infrastructure with the exception of wind turbines, including but not limited to collector substations, switching stations, permanent offices, electricity transmission lines, site compounds, communication cables (including control cables and earthing), wind monitoring masts and internal roads.
Applicant	Spicers Creek Wind Farm Pty Ltd, or any person carrying out the development approved under this consent
Battery storage	Large scale energy storage system
Clearing	As defined in Part 5A of the Local Land Services Act 2013:
Commissioning	The testing of the components, equipment and systems of the development following completion of construction, prior to operations commencing
Contractor	Construction Contractors for the pre-construction minor works, Civil Balance of Plant (CBoP), Electrical Balance of Plant (EBoP), and Turbine Supplier Interface (TSI). Also refers to any other principal contracting entity engaged on the Project, such as Energy Corporation and the REZ Network Operator
Construction	The construction of the Project, including but not limited to, the carrying out of any earthworks on site and the construction of any ancillary infrastructure (but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying).
Development Consent	SSD-41134610
Development Corridor	The area generally bound by a buffer of 100 m radius around the Development Footprint. For the absence of doubt, the over-sail of WTGs may extend beyond this Development Corridor but will be within the Project Site.
Development Footprint	The extent of ground disturbance including earthworks associated with permanent infrastructure and temporary facilities (other than temporary field laydown areas) in the Project Site.
Ground Disturbance	Activities that cut into the existing ground surface. For the absence of doubt this does not include activities that occur on the ground surface including but not limited to driving vehicles on the ground, parking vehicles, placing infrastructure or materials such as stockpiles on the ground.
Heavy Vehicle	As defined under the <i>Heavy Vehicle National Law</i> (NSW), but excluding light and medium rigid trucks and buses no more than 8 tonnes and with not more than 2 axles.
Light Vehicle	Car or rigid truck to 8T GVM or bus to 12 seats.
Meteorological Masts	Temporary and Permanent masts up to hub height of the WTGs and of a guyed, narrow lattice or tubular steel design and concrete footings of approximately 1 m ² for each of the mast and guy wires. Guy wires may extend beyond 100 m from the base of the mast. The final number and location of the masts will be determined post-Development Consent, post-WTG selection and detailed design. The masts and the guy wires that secure them may need to be located outside of the Development Corridor, however they will remain within the Project Site.
Micro-siting	The process of locating WTGs, battery storage, ancillary infrastructure and temporary infrastructure during detailed design without further approval providing:

Term	Definition
	<ul style="list-style-type: none"> • the ground disturbance remains within the Development Corridor (with the exception of wind monitoring masts) • no WTG is moved more than 100 metres from the relevant GPS coordinates. • the revised location of the blade of a WTG is at least 50 metres from the canopy of existing hollow-bearing trees; or where the proposed location of the blade of a WTG is already within 50 metres of the canopy of existing hollow-bearing trees, the revised location is not any closer to the existing hollow-bearing trees • the meteorological masts are located within the Project Site
Operation	The operation of the project, but does not include commissioning, trials of equipment or use of temporary facilities,
Pre-construction Minor Works	<p>Includes the following activities:</p> <ul style="list-style-type: none"> • surveys; • overhead line safety marking; • building/road dilapidation surveys; • investigative drilling, excavation or salvage; • minor clearing or translocation of native vegetation; • establishment of temporary site office (in locations meeting the criteria defined in the Development Consent); • installation of environmental impact mitigation measures, fencing, enabling works; • wind monitoring masts; and • Construction of minor access roads and minor adjustments to services/utilities, etc..
Project	The Spicers Creek Wind Farm
Project Site	The land within the cadastral boundaries associated with the proposed Project, as defined in Appendix 1 and 2 of the Development Consent.
Proponent	Same as the Applicant
Substations	Infrastructure required to collect the internal electrical reticulation to increase the voltage for transmission to connect to the grid, and the infrastructure to physically connect to the grid (i.e. switching station). Typically includes step-up transformers, an array of cable marshalling, busbars, switchgear and protection, various voltage and current transformers, operation and facilities building with parking, communication facilities and tower, diesel generator, lighting, a buried earth grid, lightning masts, power conditioning equipment, a reactive power control system, and network support equipment as required and agreed with REZ Network Operator (or other transmission network system operator).
The Minister	Minister for the Environment and Water (Commonwealth)
The Secretary	Planning Secretary under the EP&A Act, or nominee.

1 Introduction

1.1 Project Overview

The Proponent, Spicers Creek Wind Farm Pty Ltd, has obtained Development Consent for the construction, operation, maintenance, and decommissioning of the Spicers Creek Wind Farm (SCWF, the Project). The Project is located approximately 25 km north west of Gulgong and 35 km north east of Wellington in the Central West Orana region of New South Wales (NSW), within the Dubbo Regional and Warrumbungle Shire Local Government Areas (LGA).

The Project will have a capacity of approximately 700 megawatts (MW), with the potential to power approximately 397,000 homes. The Project comprises up to 117 wind turbine generators (WTGs), battery storage and associated infrastructure including, access roads, hardstands, laydown areas, internal electrical reticulation, temporary construction compounds, rock crushing facilities, concrete batching plant(s), substations, an operations and maintenance facility, overhead transmission line and switching stations. The Development Footprint comprises of a total area of approximately 1,471 ha.

The approved Project layout is shown on **Figure 1.1**. This layout will be further refined throughout detailed design and a Final Layout Plan will be prepared and submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) in accordance with Development Consent Condition C8.

A full description of the Project is provided in the Submissions Report which can be accessed on the SCWF website at <https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm>.

1.2 Purpose and Objective of this EMS

This Environmental Management Strategy (EMS) has been prepared to meet State and Commonwealth environmental approval requirements.

This EMS is an overarching plan which sets out the environmental management strategies for all facets of the Project including design, pre-construction minor works, construction, operation and maintenance, and decommissioning.

In addition to the EMS, several other specific environmental management plans are required by the Development Consent (refer to **Section 2.3.1**). The scope of these management plans is to provide detailed procedures for managing the relevant environmental issues in each plan. The mitigation measures, monitoring methods and reporting procedures are detailed in these subplans and are periodically reviewed as the Project progresses. These subplans require approval by the NSW Planning Secretary.

Following approval from the NSW Planning Secretary, this EMS will be implemented in accordance with Development Consent Condition C1 and will be published on the project website in accordance with Development Consent Condition C15.

1.3 Project Staging

In accordance with Development Consent Condition C3, any strategy, plan or program required under the Development Consent may be prepared and submitted on a staged basis, with the approval of the NSW Planning Secretary.

Pursuant to Condition C3 of the Development Consent, the Proponent obtained approval from the NSW Planning Secretary to stage Project management plans as outlined in **Table 1.1** below.

This version of the EMS applies to Stage 1a. Triggers for review and revisions required to support the transition of this EMS between stages are outlined in **Table 1.1**.

Table 1.1: Project Staging Approach

Stage	Description of Stage	Triggers for EMS Preparation and Revision
Stage 1a	Pre-construction minor works activities associated with the wind farm and associated infrastructure, including road upgrades.	EMS to be prepared prior to commencing Stage 1a. <i>EMS to cover Stage 1a</i>
Stage 1b	Commence construction of the wind farm (excluding high-risk heavy vehicles requiring an escort).	Revise EMS prior to commencing Stage 1b. <i>Revised EMS to cover Stages 1b, 1c, 1d and Stage 2 (ie. construction and operation of the wind farm and the battery energy storage system)</i>
Stage 1c	Continue construction of the wind farm (including high-risk heavy vehicles requiring an escort).	
Stage 1d	Commence operation of the wind farm	
Stage 2a	Commence construction of the Battery Energy Storage System (BESS)	
Stage 2b	Commence operation of the BESS	
Stage 3	Decommissioning of the wind farm (and battery storage system, if constructed) at end of life	Revise the EMS to incorporate all necessary details and measures associated with Decommissioning. <i>Revised EMS to cover Stage 3 only</i>

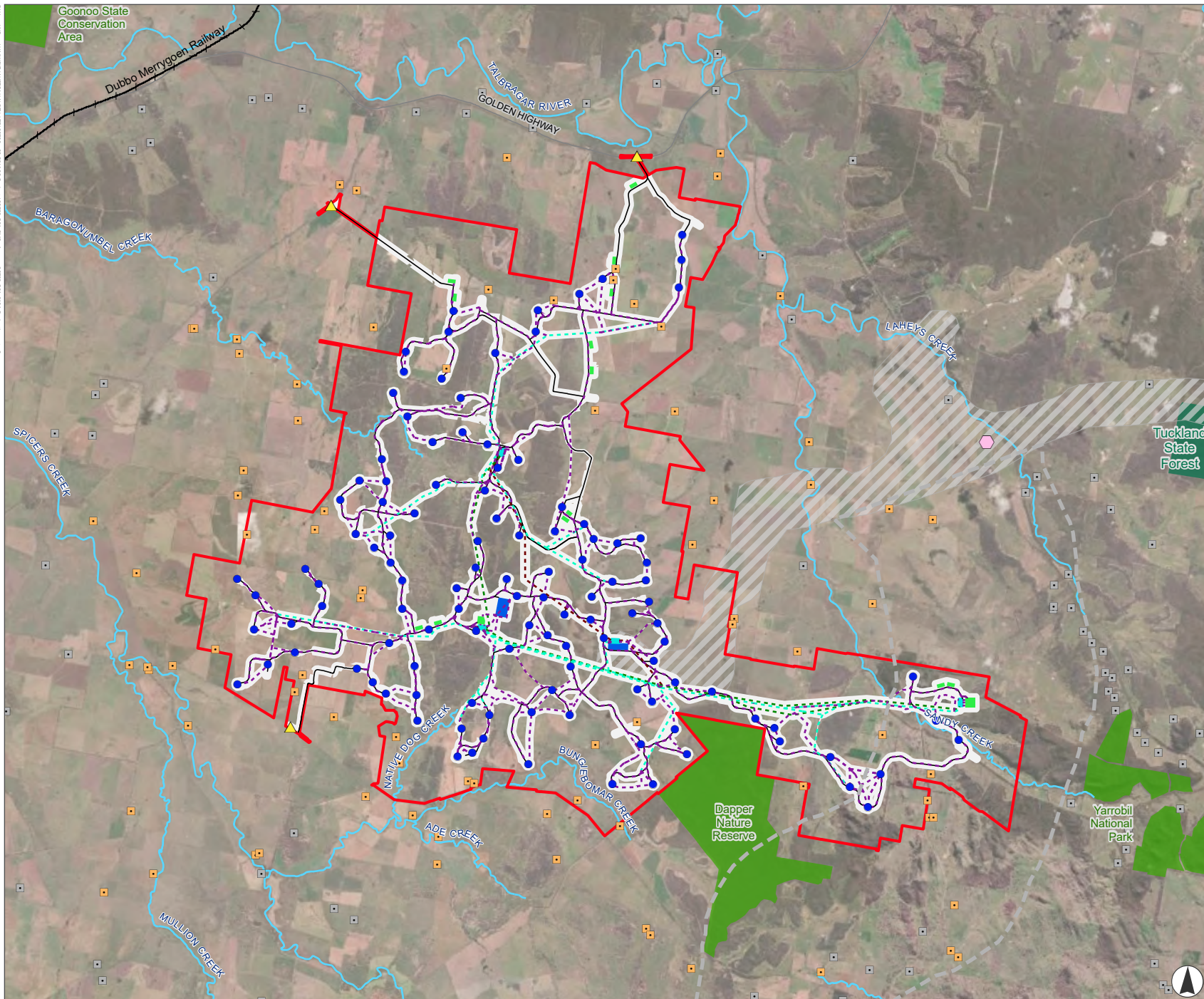
1.4 Application of this EMS

As noted in **Section 1.20**, this EMS applies to all facets of the Project (wind farm and associated infrastructure).

This EMS applies to, and must be followed by, all employees, contractors and visitors during the construction, operation and decommissioning of the Project.

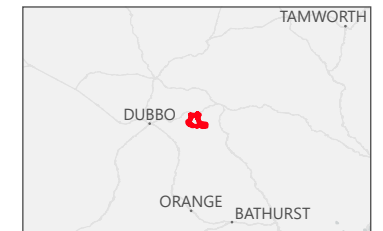
The EMS will form the basis of the Construction Environmental Management Plan (CEMP) to be prepared by the Contractor. Further details on the CEMP are provided in **Section 2.3.2**.

FIGURE 1.1
Spicers Creek Wind Farm Project



Legend

- Project Site
- Development Corridor
- EnergyCo Indicative REZ Transmission Corridor
- EnergyCo Potential Southern Extension
- Site Compound
- Electrical Plant Compound
- Substation
- Associated - House
- Non Associated - House
- Wind Turbine Generator
- ▲ Site Access Point
- ◆ EnergyCo Elong Elong Energy Hub
- Overhead Powerline (HV or MV)
- Overhead Powerline (HV)
- Overhead Powerline (MV)
- Underground Powerline
- Access Track
- NPWS Reserve
- State Forest
- Waterway
- Road
- Railway
- Locality



0 2 4
 Kilometres

Scale 1:140,000 at A4
 GDA2020 MGA Zone 55

This document and the information are subject to Terms and Conditions and Umwelt (Australia) Pty Ltd ("Umwelt") Copyright in the drawings, information and data recorded ("the information") is the property of Umwelt. This document and the information are solely for the use of the authorized recipient and this document may not be used, copied or reproduced in whole or part for any purpose other than that which it was supplied by Umwelt. Umwelt makes no representation, undertakes no duty and accepts no responsibility to any third party who may use or rely upon this document or the information.

APPROVED FOR AND ON BEHALF OF Umwelt

2 Environmental Management Framework

2.1 Environmental Management System

This EMS is integrated with and forms part of the broader Squadron Energy ISO 14001 certified Environmental Management System. This includes processes related to incident management, risk assessment, training, and reporting.

The Squadron Energy Environmental Management System is structured generally in accordance with ISO 14001:2015 with Amendment 1:2024 process of Plan-Do-Check-Act (refer to **Figure 2.1**).

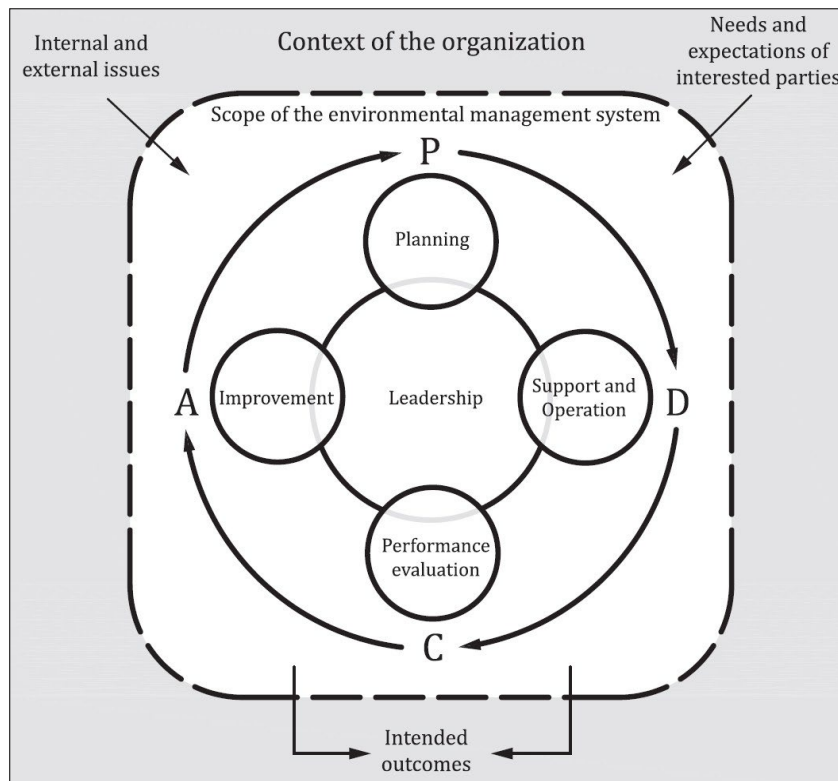


Figure 2.1: ISO 14001:2015 Plan-Do-Check-Act extract

2.2 Environmental Policy

All Project activities will be undertaken in accordance with the relevant principles of Environmental Policy SQE-02-POL-022 which is provided in **Appendix A**. This policy has been structured generally in accordance with ISO 14001:2015 with Amendment 1:2024 and documents Squadron Energy’s commitment to minimising environmental impacts in addition to the principles of ecologically sustainable development to ensure the protection and preservation of the environment for current and future generations.

The policy will be communicated to all staff and contractors during induction and will be periodically reviewed against environmental performance and industry practice.

2.3 Environmental Plans

2.3.1 Environmental Strategies, Plans and Programs

In addition to this EMS required by Development Consent Condition C1, the Development Consent requires several other strategies, plans, and programs to be prepared for the Project:

Final Layout Plan (Development Condition C8)

A plan showing the details on siting of wind turbines, including micro-siting of any wind turbines and/or ancillary infrastructure, GPS coordinates of wind turbines, and a comparison to the approved layout.

Biodiversity Management Plan (BMP) (Development Consent Condition B26)

This plan describes the biodiversity management measures that will be implemented to avoid, minimise, and mitigate impacts associated with the Project, during design, construction and operation. Once approved, the BMP will be implemented by the Proponent and contractors.

Bird and Bat Adaptive Management Plan (BBAMP) (Development Consent Condition B27)

Provides a program for monitoring potential impacts of the Project on birds and bats and details a strategy for managing and mitigating any significant bird and bat impacts arising from the operation of the Project. Once approved, the BBAMP will be implemented.

Heritage Management Plan (HMP) (Development Consent Condition B29)

Describes the heritage management measures that will be implemented to protect, minimise, and manage impacts associated with the Project, during design, construction and operation. Once approved, the HMP will be implemented.

Traffic Management Plan (TMP) (Development Consent Condition B36)

Describes the transport routes to be used for Project-related traffic, road upgrade work requirements, dilapidation survey requirements, measures that will be implemented to minimise traffic safety impacts and disruptions to local road users during construction, upgrading or decommissioning works, measures that will be implemented to comply with the traffic/transport consent conditions and a driver's code of conduct. Once approved, the TMP will be implemented.

Fire Safety Study (Condition B41)

Demonstrates that the battery energy storage facility is designed and will be operated to minimise fire risk and prevent fire escalation. Identifies appropriate fire prevention, protection and incident control measures, including fire safety systems, water supply, battery separation/compartimentalisation, and facility-specific incident control strategies.

Emergency Plan (Development Consent Condition B47)

Details the fire hazards and risks that apply to the Project, provides measures to prevent or mitigate fires igniting, procedures that would be implemented if there is a fire on site or in the vicinity of the site, bushfire emergency planning and emergency contact details. Once developed, the Emergency Plan will be implemented.

Accommodation and Employment Strategy (AES) (Development Consent Condition B50)

Proposes measures to ensure sufficient accommodation for the Project workforce, provides options for prioritising the employment of local workers for construction and operation of the Development, and consideration of cumulative impacts associated with other State Significant Development projects in the area. Once approved, the AES will be implemented.

These strategies, plans and programs provide the detailed mitigation measures necessary to minimise environmental impact and achieve compliance.

Work as Executed Plans (Condition C9)

Plans showing the final constructed layout of the development and comparison against the approved Final Layout Plans.

Once approved, copies of the above strategies, plans and programs will be made available on the SCWF website: <https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm>

2.3.2 Contractor Environmental Management Plans

As part of the Environmental Management Framework of the Project, the Contractors for the pre-construction minor works, Civil Balance of Plant (CBoP), Electrical Balance of Plant (EBoP), and Turbine Supplier Interface (TSI) will each prepare and implement a CEMP and various safety management plans prior to commencing construction of their scope of works. The CEMP will detail procedures and plans to address specific requirements of the project approvals, the overarching EMS, and the subplans that are listed in **Section 2.3.1**

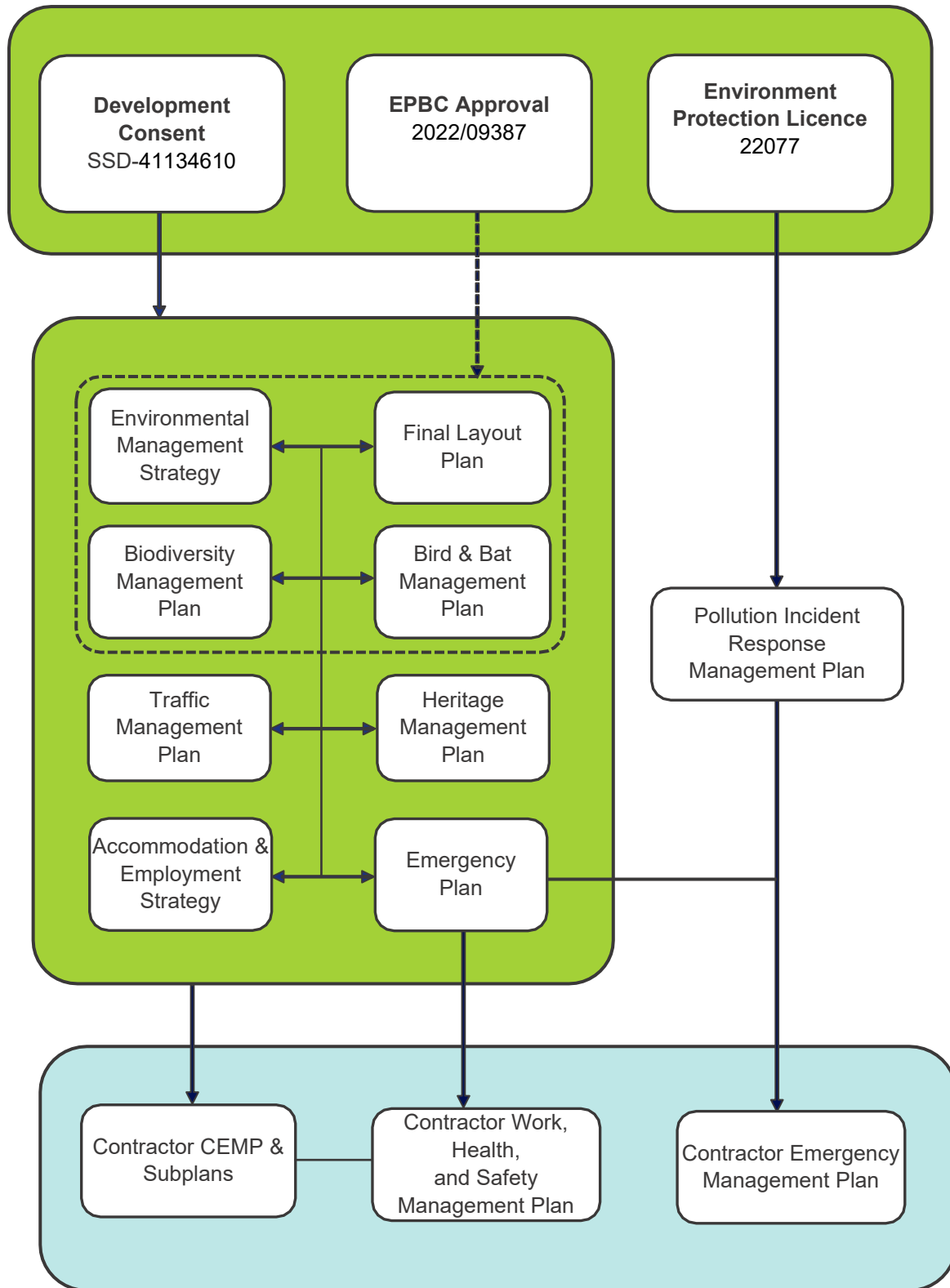


Figure 2.2 Relationship between SCWF and Contractor Management Plans

3 Statutory Approvals

3.1 Overview of Statutory Approvals

The following statutory approvals have been obtained for the Project:

- Development Consent SSD-41134610
- Commonwealth EPBC Approval 2022/09387

Copies of the approvals are available on the SCWF website:

<https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm>

3.2 NSW Development Consent SSD-41134610

The Project has obtained State Significant Development Consent (SSD-41134610) under the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act). An Environmental Impact Statement (EIS) was prepared as part of the major project approval process to assess the impacts of the Project. The EIS and associated documentation can be found on the NSW Major Projects website:

<https://pp.planningportal.nsw.gov.au/major-projects/projects/spicers-creek-wind-farm>

The requirement to prepare this EMS is stipulated by Development Consent Condition C1, which is provided in **Table 3.1** below. The relevant sections of this EMS that address the requirements of Development Consent Condition C1 are also identified in **Table 3.1**.

Table 3.1 Requirements of Development Consent Condition C1

Development Consent Condition	Condition Requirement	Location in this Plan
Condition C1 – Environmental Management Strategy	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	This document.
	a. provide the strategic framework for environmental management of the development;	Section 2
	b. identify the statutory approvals that apply to the development;	Section 3
	c. describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4.1
	d. set out the procedures that would be implemented to:	Section 4.3
	(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;	Section 4.4
	(iii) resolve any disputes that may arise;	Section 4.4.3
	(iv) respond to any non-compliance;	Section 5.5
(v) respond to emergencies; and	Section 4.5	

Development Consent Condition	Condition Requirement	Location in this Plan
	e. include:	Section 2.3
	(i) 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."	Section 5.3
	Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	This plan will be implemented upon approval

Additional conditions of the Development Consent that are relevant to environmental management are provided in **Appendix B**.

All conditions of the consent are incorporated into SCWF's internal Compliance Tracking Matrix, which will be maintained by the SCWF Project Environmental Advisor throughout the Project.

3.3 EPBC Approval 2022/09387

The Project has obtained a Controlled Action Approval under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC 2022/09387). The EPBC Referral and related Decision Notices are available on the EPBC Public Portal at the following website:

<https://epbcpublicportal.awe.gov.au/all-referrals/>

In accordance with Condition 21 and 22 of the EPBC Approval 2022/09387, the following plans will be submitted electronically to the Minister and published to the SCWF website once approved by the NSW Planning Secretary:

- Biodiversity Management Plan (BMP) (Development Consent Condition B26);
- Bird and Bat Adaptive Management Plan (BBAMP) (Development Consent Condition B27);
- The Environmental Management Strategy (Development Consent Condition C1); and
- Final Layout Plan (Development Consent Condition C8).

All conditions of the EPBC Approval are incorporated into SCWF's internal Compliance Tracking Matrix (refer to **Section 5.5.4**), which will be maintained by the SCWF Project Environmental Advisor throughout the Project.

3.4 NSW EPA Environment Protection Licence (EPL 22077)

An Environment Protection Licence has been obtained for the Project (EPL 22077). The EPL 22077 lists one Scheduled Activity as defined in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act), being:

- crushing, grinding or separating; > 30000 - 100000 T annual processing capacity.

All EPL Conditions are incorporated into the Project's internal Compliance Tracking Matrix (refer to Section 5.5.4), which will be maintained by the SCWF Project Environmental Advisor throughout the development.

3.5 Additional Approvals, Permits and Licences

Other approvals, permits and licences relevant to the Project are detailed in **Table 3.2**.

Table 3.2: Additional Approvals, Permits and Licences

Approval Type	Activity Relating to Approval	Timing	Approval Authority
Heavy vehicle permits for the use of over-dimensional vehicles <i>Roads Act 1993</i>	Required for the transport of over-size over-mass (OSOM) components to the Project Site.	Prior to transporting OSOM components.	National Heavy Vehicle Regulator
Road upgrade approval (Section 138) <i>Roads Act 1993</i>	Required for road upgrades.	Prior to undertaking any road upgrades.	Transport for NSW Dubbo Regional Council Warrumbungle Shire Council
Works Authorisation Deed (WAD)	Required to undertake roadworks on the State road network and/or traffic control signals.	Required prior to undertaking road upgrades within the State road network.	Transport for NSW
Water Access Licence (WAL) <i>Water Management Act 2000</i>	Water purchase for construction activities and civil construction activities.	A WAL will be obtained, if required, prior to taking any water.	Water NSW
Water Use Approval Section 89 <i>Water Management Act 2000</i>	To apply water for a specific purpose at a location during construction	A Water Use Approval will be obtained when a WAL is obtained.	Water NSW
Water Supply Work Approval Section 90 <i>Water Management Act 2000</i>	Construction and use of a water supply work (e.g., pump or bore) to extract water for construction activities	A Water Supply Work will be obtained, if a bore is installed to take water	Water NSW

It is noted that the following Approvals are not required pursuant to Section 4.41 of the EP&A Act.

Table 3.3: Approvals, Permits and Licences not required

Approval Type	Activity
Section 201 Dredging Reclamation <i>Fisheries Management Act 1994</i>	Dredging: Any work that involves excavating water land, or any work that involves moving material on water land or removing material from water land. Reclamation: Using any material (such as sand, soil, silt, gravel, concrete, oyster shells, tyres, timber or rocks) to fill in or reclaim water land, or depositing any such material on water land for the purpose of constructing anything over water land (such as a bridge), or draining water from water land for the purpose of its reclamation.
Section 205 Remove marine Vegetation <i>Fisheries Management Act 1994</i>	Permit to remove or harm mangroves, seagrasses, any other marine vegetation declared by the regulations to be marine vegetation

Approval Type	Activity
Section 219 Block Fish Passage <i>Fisheries Management Act 1994</i>	Permit to block or obstruct fish passage during works including the construction, alteration, or modification of dams, weirs, reservoirs, floodgates, or other waterway obstructions.
Section 91 Activity approval <i>Water Management Act 2000</i>	There are two kinds of activity approvals: <ol style="list-style-type: none"> 1. Controlled Activity Approval: Authorises specified controlled activities at a specified location in, on, or under waterfront land. 2. Aquifer Interference Approval: Authorises specified aquifer interference activities at a specified location or area, often required for mining, road construction, or other large-scale excavation activities.
Approval under Part 4 or Section 139 Excavation Permit <i>Heritage Act 1977</i>	Authorises disturbance or excavation of land where a relic may be discovered, exposed, moved, damaged, or destroyed, in accordance with an excavation permit. Also applies when a relic has already been discovered or exposed.
Division 8 of Part 6 <i>Heritage Act 1977</i>	Regulates harm to buildings, works, relics, and places not subject to interim heritage orders or State Heritage Register listing, without preventing State Significant Development authorised by development consent.
Section 90 Aboriginal Heritage Impact Permit <i>National Parks and Wildlife Act 1974</i>	Issued for specified Aboriginal objects, places, land, activities, or persons, or for specified classes of such objects, places, land, or activities.
Section 100B Bush Fire Safety Authority <i>Rural Fires Act 1997</i>	Authorises development on bush fire prone land, including subdivisions for residential/rural purposes or development for special fire protection purposes. Ensures compliance with standards for setbacks, water supply, and other measures to protect people, property, and the environment from bush fire risk.

Note: Pursuant to Section 4.41 of the EP&A Act, a water use approval under Section 89, and a water management work approval under Section 90 of the *Water Management Act 2000*, would not generally be required. However, this exemption only applies to works that have been considered, assessed, and approved through the SSD process.

For the exemption to apply, the work and its water source must have been clearly identified, and the impacts of water use (including effects on third parties, groundwater-dependent ecosystems, and cultural sites) must have been assessed. The SCWF project does not benefit from this exemption because water supply arrangements were not addressed in sufficient detail during the SSD process. As such, if the project elects to take water from a bore (existing or new) these approval will be needed prior to such works commencing.

4 Implementation and Operation

4.1 Structure and Responsibility

The Proponent, is responsible for ensuring compliance of the Project with State and Commonwealth environmental approval requirements for environmental management (refer to **Section 3**) throughout the lifecycle of the Project. The Proponent will ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of the approval relevant to activities they carry out.

The Proponent will engage a contractor for the pre-construction minor works, Civil Balance of Plant (CBoP), Electrical Balance of Plant (EBoP), and Turbine Supplier Interface (TSI) who will each be responsible for the design and construction of the Project, within their respective scope. The Proponent will provide this EMS to the each contractor, who will be responsible for preparing a CEMP to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

The Contractor CEMP will include roles and responsibilities, reporting procedures, authorisations for managing environmental incidents, non-compliance, environmental management and mitigation, risk assessment and inspection and audit of the Project during the design and construction phase. The Contractor CEMP will be prepared before the commencement of construction of Stage 1a and Stage 1b by the relevant contractors and will be reviewed by the Proponent. The Proponent will review the contractors' documentation to confirm consistency with the requirements of this EMS and subplans.

During operation, SCWF's EMS will be revised to reflect the operational status of the Project, and this EMS will be provided to the operation contractor who will be responsible for preparing an Operational Environmental Management Plan (OEMP) to meet all statutory requirements as it relates to the scope of their works and environmental requirements.

The Proponent will undertake audits and inspections of the contractors to assess compliance and environmental management. The scope and frequency of the environmental audits is described in **Section 5.2**. The contractors will be required to keep and supply records that support compliance and environmental obligations to the Proponent. Incidents and non-conformances must be reported to the Proponent in accordance with the timeframes and to meet the requirements specified in the contract, and as described in **Section 5.4**.

Table 4.1 provides a general summary of the intended roles and likely responsibilities of the key personnel.

Table 4.1: Key Roles and Responsibilities

Role	Responsibility
SCWF Project Manager	<ul style="list-style-type: none"> • Implementation of Squadron Environmental Policy; • Approval and management of Contractor; • Delivery of the Project in accordance with this EMS, associated plans and statements and respective conditions of approval; • Review and approve Project design changes, and update SCWF Project Environmental Advisor; • Provide adequate resources to allow the implementation of the Project EMS; • Issue non-conformance notices and issue actions to avoid or minimise potential environmental impacts, and failing the effectiveness of such steps, order cessation of a specific activity; and • Ensure all Project personnel attend an environmental site induction prior to commencing work. • Obtain and maintain all required approvals, permits and licences for the Project, in consultation with the SCWF Project Environment Advisor.

Role	Responsibility
SCWF Project Environmental Advisor	<ul style="list-style-type: none"> • Ensure site specific environmental requirements are fulfilled and be the primary point of contact for community and liaison, including responding to any community complaints; • Ensure sub-contractors and agents comply with the EMS, management plans and programs; • Undertake environmental surveillance, auditing and reporting; • Be the primary point of contact for regulatory agency liaison; • Oversee environmental monitoring; • Report to SCWF's Project Manager on environmental performance of the Contractors and sub-contractors. • Support the SCWF Project Manager in identifying, obtaining and maintaining all required approvals, permits and licences, and provide technical environmental advice to ensure ongoing compliance.
SCWF Community Relations Advisor	<ul style="list-style-type: none"> • Ensure the community is well informed of activities at the Project, and activities which may affect the Community and their interests; • Ensure all staff and contractors are aware of the community; and • Consultation requirements and complaints protocols
Contractor Project Manager	<ul style="list-style-type: none"> • Overall responsibility for workers and subcontractors involved in the Project; • Consult with SCWF's Project Manager in relation to all Project design plan changes; • Ensure adequate resources are available for the relevant contracted scope of work and subcontractors to deliver the Project in compliance with the EMS and other relevant documents; • Ensure all workers and subcontractors are inducted prior to commencing work; and • Hold regular Project team meetings and toolbox talks, ensuring information is shared between all site personnel. • Support and attend Community Consultative Committee (CCC) meetings at the request of the Proponent's Project Manager.
Contractor Environmental Advisor	<ul style="list-style-type: none"> • Obtain the relevant licences and approvals for construction; • Implement and monitor performance against CEMP commitments (as consistent with the Development Consent and associated management plans); • Manage environmental incidents; • Maintain environmental registers including compliance, waste tracking, complaints, training and incidents; • Undertake regular (at least weekly) environmental inspections and provide advice to ensure compliance with relevant approvals and associated management plans under the Development Consent; • Prepare reports (at least monthly) on compliance to the satisfaction of the SCWF Project Environmental Advisor; • Prepare environmental induction training materials in accordance with the EMS and associated plans; and • Implementation of the management plans and programs identified in Section 2.3.1.
All Employees and Contractors	<ul style="list-style-type: none"> • Complete a site induction prior to commencing works on site; • Attend all environmental training as required; • Comply with the environmental controls in this EMS and all associated environmental management plans and strategies; • Undertake all activities in accordance with agreed procedures and work methods; • Implement the actions identified in their management plans and programs in order to comply with respective approval conditions; and • Follow instructions of the SCWF Project Environmental Advisor.

Role	Responsibility
SCWF Independent Environmental Auditor	<ul style="list-style-type: none"> • Review the adequacy of the measures undertaken to deliver the Project in accordance with the EMS, management plans, programs, Development Consent and Commonwealth approval. To be undertaken within 12 weeks of the commencement of construction (stage 1b) and every six months thereafter during construction, consistent with the requirements of the Approval; • Request reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, direct that relevant actions be ceased immediately; and • Provide an audit report to be forwarded to the Secretary or Minister as relevant that: <ul style="list-style-type: none"> – assesses whether the Project complies with the relevant requirements in the Development Consent, and any strategy, plan or program required under the Development Consent; and • recommends appropriate measures or actions to improve the environmental performance of the Project and any strategy, plan or program required under the Development Consent

4.2 Training, Awareness and Competence

4.2.1 HSEQ Induction

During pre- construction and construction stages, health, safety, environment and quality (HSEQ) training will be managed by the relevant Contractor (primarily the Contractor Environmental Advisor and the Contractor Project Manager). This responsibility will transfer to the Proponent during operation of the Project.

All personnel (SCWF employees, contractors and sub-contractors) engaged to carry out the development will complete a HSEQ induction prior to commencing work on-site. This induction will include an overview of:

- The SCWF Environmental Management System.
- Statutory obligations and regulatory requirements, including compliance obligations and requirements of due diligence and care.
- Key roles, responsibilities and accountabilities (see **Section 4.1**).
- Identification of key environmental risks, constraints and hazards and management controls identified under the various management plans and strategies identified in **Section 2.3.1**.
- Emergency procedures as set out in the Emergency Plan.
- Incident reporting procedures (see **Section 4.5**).
- Any short-term visitors (e.g., making deliveries to site) will be required to be accompanied by inducted personnel.

4.2.2 Pre-Start Meetings

During construction, the Contractor Project Manager or delegate will lead daily pre-start meetings to discuss key HSEQ issues and risks. All on-site personnel will be required to attend pre-start meetings.

4.2.3 Toolbox Talks

Toolbox talks will be used to raise awareness and educate personnel on HSEQ-related matters.

All toolbox talks will include discussion regarding environmental issues and risks (e.g., vegetation clearance protocols, the management of unexpected heritage items, erosion and sedimentation control and noise and dust management).

Toolbox talks will be led by the Contractor Environmental Advisor or delegate during construction and the SCWF Project Manager or delegate during operation phase.

4.2.4 Environmental Awareness Training

Targeted environmental awareness training will be provided on an as-needed basis to employees, contractors, or sub-contractors who have specific responsibility for environmental management, or who are required to complete environmental training specified in the relevant management plans identified in Section 2.3. Environmental awareness training may be delivered by external providers or by the Contractor Environmental Advisor or delegate.

The Contractor Environmental Advisor and SCWF Project Environmental Advisor will be responsible for maintaining training records during construction and operations, respectively, and for ensuring that workers complete the necessary environmental awareness training prior to undertaking relevant tasks.

4.3 Communication

4.3.1 Community Consultation

A Community Consultative Committee (CCC) will be established for the Project prior to commencement of Construction (Stage 1b), in accordance with Development Consent Condition A18. The CCC will operate in accordance with the *Community Consultative Committee Guidelines for State Significant Projects (2023)* or its latest version.

The frequency of committee meetings is determined by the committee members, after considering factors such as the stage of the Project and level of public interest. As such, the frequency may vary over time as the Project moves through the different stages of development, operation, and decommissioning. Scheduling of the CCC meetings will be determined at each meeting and recoded in the minutes. A minimum four weeks' notice is required to convene a regular meeting.

The CCC will also be consulted on the Project's community program.

Minutes from the CCC meetings will be published on the Project website.

4.3.2 Information Sharing

The Proponent will share and provide information to the relevant regulatory agencies in accordance with the respective approval conditions and notification procedures described in the relevant management plans listed in **Section 2.3.1**.

Information sharing with the community and other stakeholders is described below.

Public Website

SCWF has a dedicated website which is regularly updated and will be maintained for the life of the Project to provide key updates and information to the community, including:

- the EIS
- the Final Layout Plans for the development
- current statutory approvals for the development
- approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Emergency Plan)
- 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:
 - Bird and Bat Annual Monitoring report
 - Operational Noise monitoring report
 - Aboriginal Cultural Heritage Excavation Report
 - Photographic Archival Report
- 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 Proponent's response to the recommendations in any audit
- construction progress updates at appropriate milestones, including identification of any substantial delays
- any other matter required by the Planning Secretary

A link to the website is provided below:

<https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm>

Other information sharing mechanisms

Additionally, a combination of the following mechanisms will be implemented as required, to keep the local community and relevant agencies informed about the operation and environmental performance of the Project:

- Distribution of an e-newsletter to registered parties providing Project updates via email (registrations are open to all stakeholders and can be made on the Project website);
- Regular and ongoing CCC meetings;
- Maintaining a complaint register and publishing monthly on the Project website;
- Reporting incidents and non-conformances to relevant government agencies;
- Publishing annual environmental performance reports and providing to relevant government agencies (e.g. NSW independent environmental audit report and Commonwealth annual compliance report);
- Establishing a dedicated telephone line and email address for enquiries;
- Newspaper advertisement, where appropriate; and
- Community open days.

4.4 Complaints

4.4.1 Receiving Complaints

Complaints and enquiries about the Project can be received in the following ways:

- Project email address: spicerscreekwind@squadronenergy.com
- Phone, via the complaints and issues contact point: 1800 095 754
- Post: PO Box 1708, Newcastle, NSW 2300
- Face to face.

For the duration of construction and operation, the email, phone, and postal contact methods will be maintained and published on the Project website.

4.4.2 Complaint Handling and Response

Complaints received via any of the methods listed above will be provided to SCWF's Project Community Relations Advisor within 24 hrs of receiving the complaint. Additional SCWF key personnel will be notified for action, as required.

Complaints and enquiries will be responded to within 48 hours of receipt. Initial contact with the complainant will either outline actions taken to resolve the complaint or a holding statement while the complaint is being investigated.

All complaints will be recorded in a register which will be maintained by the SCWF Project Community Relations Advisor. The register will include:

- Date and time of the complaint;
- Type of communication (i.e. telephone, mail, meeting, email etc);
- Name, address, contact telephone number of complainant/enquirer (where available);
- Nature of the complaint and enquiry;

- Actions taken in response including any associated timeframes for implementing the action;
- If no action was taken, the reason why no action was taken; and
- When and how the complainant/enquirer was notified of the outcome or provided an answer.

The complaints register will be placed on the website (noting personal information relating to the complaint or the person making the complaint will be removed) and updated monthly.

4.4.3 Dispute Resolution

The Proponent aims to maintain a good relationship with all internal and external stakeholders and all efforts will be made to resolve any disputes internally with the affected party.

When a complaint cannot be resolved and a dispute has arisen:

- An investigation will be initiated by SCWF's Project Manager, with input from relevant parties as required, to clarify the dispute and actions taken to date.
- An investigation will be undertaken to assess the nature of the dispute and possible resolution with the aim of reaching mutual agreement between parties.
- If necessary, an appropriately qualified and experienced independent person or third party, (e.g. a technical or subject matter expert) may be asked to provide advice on the investigation and/or facilitate mediation to reach a resolution. There may be some circumstances where it is appropriate to involve the Australian Energy Infrastructure Commissioner to assist with the dispute resolution process if the complaint or dispute has previously been referred to Commissioner.
- If agreement cannot be achieved, either party may refer the dispute to the NSW Planning Secretary for resolution in accordance with the Development Consent. This includes disputes relating to:
 - visual impact mitigation measures (Development Consent Condition B1);
 - road upgrades to be implemented (Development Consent Condition B33);
 - scope and implementation of road maintenance and remedial works (Development Consent Condition B34);
 - aviation hazard lighting, including which wind turbines are to be lit (Development Consent Condition B3); and
 - mitigation measures implemented in response to disruptions to radio communications (Development Consent Condition B40).

Any identified non-compliances will be managed in accordance with the non-compliance procedure outlined in Section 5.5, including notification to the NSW Planning Secretary in accordance with Development Consent Condition C12.

4.5 Incident and Emergency Response

4.5.1 Response to an Incident under the Development Consent

In accordance with Development Consent, an 'Incident' is defined as:

An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.

And the definition of 'Material Harm' is:

Is harm that:

- involves actual harm to the environment that may include (but not be limited to) a leak, spill, emission other escape or deposit of a substance, and as a consequence of that environmental harm (pollution), may cause harm to the health or safety of people; or*

- b. *results in actual loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).*

All key onsite personnel must report a potential incident to the Contractor Project Manager and SCWF Project Manager. The SCWF Project Manager in consultation with the SCWF Project Environmental Advisor (and the Contractor Environmental Advisor, as required) will determine if the incident has caused or threatens to cause material harm.

If SCWF becomes aware of an incident pursuant to the Development Consent, the SCWF Project Environmental Advisor (or other key personnel nominated by the SCWF Project Manager) will notify DPPI of the incident in writing via the NSW planning portal (Major Projects) within 24hrs of becoming aware of the incident in accordance with Development Consent Condition C10. The immediate notification will identify the Project and the location and nature of the incident.

In accordance with Condition C11, the SCWF Project Environmental Advisor (or other key personnel nominated by the SCWF Project Manager) will subsequently provide a written notification to the NSW Planning Secretary within seven days of making the immediate incident notification. This written notification will be provided via the Major Projects portal and will:

- a. identifies how the incident was detected;
- b. identifies when the Proponent became aware of the incident;
- c. identifies any actual or potential non-compliance with conditions of consent;
- d. identifies further action(s) that will be taken in relation to the incident;
- e. a summary of the incident;
- f. outcomes of an incident investigation including identification of the cause of the incident;
- g. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence, including the period for implementing any corrective and/or preventative actions; and
- h. details of any communication with other stakeholders regarding the incident.

The Proponent must submit any further reports as directed by the Planning Secretary.

For environmental incidents that do not cause or threaten to cause material harm to the environment, the SCWF Project Environmental Advisor and SCWF Project Manager will determine what external agencies need to be notified, if at all.

4.5.2 Response to an Incident Under EPBC Approval

In accordance with the EPBC, an incident is defined as:

Event which has the potential to, or does, harm any protected matter, other than as authorised by this approval.

The SCWF Project Environmental Advisor (or other key personnel nominated by the SCWF Project Manager) must notify AG DCCEEW electronically of any incident pursuant to the EPBC Approval within one business day of becoming aware of any incident..

The notification must specify:

- a. any condition or commitment made in a plan which has not been, or may have not been, complied with,
- b. a short description of the incident, and
- c. the location (if applicable, including co-ordinates), date and time of the incident.

The SCWF Project Environmental Advisor (or other key personnel nominated by the SCWF Project Manager) must provide AG DCCEEW with details of any incident within seven (7) business days of notification of the incident, specifying:

- a. all corrective measures and investigations which the approval holder has already taken in respect of the incident,
- b. the potential impacts of the incident,
- c. the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and
- d. any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.

4.5.3 Response to Emergencies

Responses to actual or potential emergencies will vary depending on the nature, scale, and severity of the emergency. Types of emergencies could include fire, explosion, chemical spill, medical emergency, natural disaster, bomb threat or violence.

Emergency response will be undertaken in accordance with the Project's specific emergency response plans and the relevant Work, Health, and Safety Regulations. The emergency response process will generally be initiated in the following way in the event of an emergency:

- Raise the alarm;
- Implement the Contractor Emergency Plan;
- For fire and bushfire emergencies, implement the Emergency Plan (Fire and Bushfire) prepared under Development Consent Condition B47; and
- For pollution incident emergencies, implement the Pollution Incident Response Management Plan (PIRMP).

External agencies and support will be requested in accordance with the decision hierarchy outlined in the Contractor's Emergency Plan, which will be prepared prior to commencement of pre-construction or construction. The SCWF Project Manager will be notified of the emergency as soon as practicable.

Requirements for relevant Emergency Plans required for the Project are detailed in **Table 4.2** below.

Table 4.2: Emergency Response Plans Relevant to the Project

Plan Title	Details of Plan	Application of Plan
Emergency Plan– Development Consent Condition B47	<p>In accordance with Development Consent Condition B47, an Emergency Plan has been developed which specifically relates to fire and bushfire emergencies at the Project Site. The purpose of the Emergency Plan is to:</p> <ul style="list-style-type: none"> • Identify the fire hazards, risks that apply to the Development; • Provide measures to prevent or mitigate fires igniting; • Provide procedures that would be implemented if there is a fire on-site or in the vicinity of the site; • Provide details of bushfire emergency planning; and • Provide emergency contact details. 	The Emergency Plan will be implemented in the event of a fire or bushfire emergency occurring on or threatening the Project.

Plan Title	Details of Plan	Application of Plan
<p>Pollution Incident Response Management Plan</p>	<p>A PIRMP will be prepared for the Project in accordance with the requirements of the POEO Act and the PIRMP Guideline (NSW EPA, 2022) and in accordance with the Environment Protection Licence.</p> <p>The PIRMP includes detailed information including, but not limited to:</p> <ul style="list-style-type: none"> • Communicating with regulatory and emergency response agencies • Description and likelihood of hazards • Pre-emptive actions to be taken • Inventory of pollutants • Safety equipment • Maps • Communicating with neighbours and the community • Minimising harm to persons on the premises • Actions to be taken during or immediately after a pollution incident • Staff training • Testing requirements. <p>The PIRMP will be tested and reviewed annually.</p>	<p>The PIRMP will be implemented in the event of a material environmental harm incident occurring at the Project.</p> <p>A copy of the PIRMP will be made available at the site at all times.</p>
<p>Contractor Emergency Plan</p>	<p>As the Principal Contractor for their work site, it is a legal requirement that the Contractor develop a comprehensive Emergency Plan specific to the Project and Contractor activities.</p> <p>This plan will be developed prior to commencement of construction to meet the requirements of relevant Work, Health, and Safety Regulations.</p> <p>The Emergency Plan will include information on emergency response including, but not limited to:</p> <ul style="list-style-type: none"> • Emergency procedures, such as site evacuation procedures, requirements for notifications to emergency services; • Actions to be undertaken during an emergency; • Site authority during events; • Effective communication on site during the emergency; • Muster points; • Emergency service and emergency contact numbers; • Requirements for testing of the emergency procedures and frequency of tests; and • Information, training, and instruction relevant to workers in relation to implementing the emergency procedures. <p>The Contractor Emergency Plan will be complimentary to the existing Emergency Plan that has been developed in accordance with Development Consent Condition B47 , and the PIRMP that will be developed by the Proponent prior to commencing construction.</p>	<p>The Contractor Emergency Plan will be implemented in the event of any emergency scenario at the Project under the control of the Contractor.</p>

4.6 Risk Management

The Proponent will apply a risk-based approach to environmental management, consistent with the organisation's ISO 14001-certified Environmental Management System. This approach ensures that potential environmental aspects and impacts are systematically identified, assessed, and managed throughout the Project lifecycle.

Environmental risk assessments will be undertaken during pre-construction, construction, operation and decommissioning, in instances where a new activity is undertaken, the nature of an activity materially changes, or a new environmental risk is identified.

The risk assessment process will:

- identify activities or events with the potential to adversely affect environmental values or human health
- assess the likelihood and consequence of potential impacts and assign a risk rating
- determine appropriate environmental controls and mitigation measures
- evaluate residual risks once controls are applied

Environmental risks, associated controls and monitoring requirements will be incorporated into the relevant Construction Environmental Management Plans, subplans and construction documentation (e.g., Safety and Environment Work Method Statement/Job Safety Analysis (SEWMS/JSA)).

5 Measurement and Evaluation

Environmental monitoring will be conducted to measure performance of the EMS, including the effectiveness of environmental control measures, and compliance with the project statutory approvals, licences, plans, strategies, and programs.

Environmental monitoring of the Project will be conducted in several ways, including:

- Environmental inspections (see **Section 5.1**);
- Environmental audits (see **Section 5.2**); and
- Specific monitoring and measurement of a particular environmental aspect as required under the Development Consent (E.g. operational noise monitoring).

5.1 Environmental Inspections

A range of environmental inspections will be conducted by the Proponent and the Contractor to evaluate the effectiveness of environmental controls and general compliance with the implementation of the EMS (and associated strategies, plans and programs) for site-based activities.

The Contractor will undertake regular environmental inspections of all relevant work areas. The outcomes of the environmental inspections will be reported within an environmental inspection checklist. The checklist will be developed as part of the Contractors CEMP. The checklist will incorporate a range of environmental inspection criteria to document compliance with, and effectiveness of, the various mitigation measures and controls specified within this EMS and within the other management plans/ strategies/ programs required under the Development Consent.

A monthly report will be provided to the SCWF Project Environmental Advisor, documenting environmental compliance unless a different timeframe is agreed with the Proponent.

The SCWF Project Environmental Advisor will undertake environmental inspections (monthly, or more frequently as required) to monitor compliance with the relevant approvals and adherence to the strategies, plans and programs listed in **Section 2.3.1**.

5.2 Environmental Auditing

5.2.1 Independent Environmental Audits Requirements

In accordance with Development Consent Condition C14, independent environmental audits of the Project will be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* (2020), within 12 weeks of commencing construction (stage 1b) and during the construction phase and within six months of commencing operations at intervals no greater than three years from the initial operational audit.

The Proponent will submit electronic copies of the independent audit reports and the Proponent's response to the audits, to the NSW Planning Secretary via the Major Projects portal no later than two months from undertaking the independent audit site inspection, unless otherwise agreed by the Department.

Independent audit reports will be published on the project website following receipt of letter of satisfaction from the NSW Planning Secretary.

5.2.2 Independent Audits Requirements of EPBC Approval

The Proponent will ensure that independent audits are undertaken in accordance with EPBC Approval Conditions 41–48, as follows:

- Condition 41: Independent audits of compliance with EPBC Approval conditions will be conducted for each subsequent three year period following the commencement of the Action, unless otherwise specified in writing by the Minister (the Audit Period).
- Condition 42: The scope of each independent audit will be sufficient to determine compliance with each approval condition and plan commitment.
- Condition 43: The criteria and conduct of each independent audit will be consistent with the *Independent Audit and Audit Report Guidelines*.
- Condition 44: An audit report will be submitted to AG DCCEEW for written agreement within 3 months of the end of each Audit Period, or as otherwise directed in writing by the Minister.
- Condition 45: Each audit report will be completed to the satisfaction of the Minister and in accordance with the *Independent Audit and Audit Report Guidelines*.
- Condition 46: Each audit report will be published on the project website, in an accessible and downloadable format, within 10 business days of written agreement from AG DCCEEW.
- Condition 47: AG DCCEEW will be notified within 5 business days of publication, including the web address of the published audit report.
- Condition 48: Published audit reports will be maintained on the project website from the date of publication until the expiry of the EPBC Approval.

5.2.3 Internal Project Audits

The Proponent will undertake internal audits to verify compliance with the Project's statutory approvals, this EMS, and the associated management strategies, plans and programs. These audits will follow a risk-based schedule developed and coordinated by the SCWF Project Manager and SCWF Project Environmental Advisor. The schedule will set out the audit scope, timing, and responsible personnel. Internal audits will be conducted quarterly during the construction phase.

Any identified non-compliances with regulatory approvals will be managed in accordance with **Section 5.5**.

5.3 Environmental Monitoring Summary

A monitoring plan for the Project has been prepared and is summarised in **Table 5.1**, which sets out all monitoring to be carried out in relation to the Project, including method, timing, responsibility, and monitoring outputs (i.e. records/reporting type).

Note: **Table 5.1** does not provide comprehensive details of all monitoring required for the Project. In some cases, the full monitoring requirements are detailed within the appropriate strategy / plan / program that has been prepared in accordance with the requirements of the Development Consent. In these instances, a reference to the relevant strategy / plan / program is provided where the full monitoring details can be found.

Table 5.1: Summary of the Monitoring Obligations Required by the Development Consent

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Operation of Plant and equipment	SSD Condition A13 EPL 22077 Condition O3.2	EMS Table 5.1 Contractors CEMP	All plant and equipment used on site will be inspected and maintained to ensure it is in proper and efficient condition	Daily pre-start inspections and as required during operation; formal maintenance checks in accordance with manufacturer's recommendations	Contractor. The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	Environmental inspection checklists by the Contractor. Internal audit reports by the Proponent, confirming that reasonable steps are being taken to ensure efficient operation of plant and equipment
Construction Hours	SSD Condition B5 EPL 22077 Condition L3.1	EMS Table 5.1 Contractors CEMP Construction Noise Management Plan (CNMP)	All relevant activities will occur only within approved hours: 7 am–6 pm Mon–Fri, 8 am–1 pm Sat, and no work on Sundays or public holidays unless approved	Daily during construction activities	Contractor The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	Environmental inspection checklists by the Contractor. Internal audit reports by the Proponent, confirming that works are occurring within the permitted hours
Exceptions to Construction Hours	SSD Condition B6 EPL 22077 Condition L3.2	EMS Table 5.1 Contractors CEMP Construction Noise Management Plan (CNMP)	Ensure that any work outside approved hours falls only under: (a) inaudible at non-associated residences; (b) delivery/dispatch of materials requested by NSW Police or other authorities; (c) emergency work to avoid loss of life, property, or environmental harm	Ongoing during all work outside standard hours	Contractor The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	Environmental inspection checklists by the Contractor. Internal audit reports by the Proponent, confirming that works are occurring within the permitted exceptions

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Construction noise monitoring	SSD Condition B8 & B9 EPL 22077 Condition O4.2	EMS Table 5.1 Contractors CEMP Construction Noise Management Plan (CNMP)	Audible construction noise will be monitored during construction, decommissioning and road upgrades, including associated traffic noise. Noise will be managed in accordance with the requirements outlined in the Interim Construction Noise Guideline (DECC, 2009)	Daily during construction activities. During weekly environmental inspections.	Contractor. The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	Environmental inspection checklists by the Contractor. Internal audit reports by the Proponent, confirming that reasonable steps are being taken to minimise construction noise emissions.
Blast overpressure monitoring	SSD Condition B11 & B12	EMS Table 5.1 Contractors CEMP	Monitoring of blast overpressure to ensure that blasting does not exceed the noise criteria set out in Condition B12 of the Development Consent. The type of monitoring and method will depend on the nature and methodology of the blasting.	Monitoring will typically be undertaken for the first blast event to verify the predictions of any blast overpressure modelling. Additional blast monitoring to be advised by technical noise/blast monitoring expert.	Contractor.	Blast monitoring report will be prepared by the Contractor (or their appointed consultant).

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Air quality monitoring	SSD Condition B17 EPL 22077 Condition O3	EMS Table 5.1 Contractors CEMP	The construction activities will be visually monitored to ensure that dust and fume emissions of the development are being minimised using reasonable and feasible measures.	Daily visual monitoring during construction activities that have the potential to generate dust (including operation of crushing plant). During weekly environmental inspections.	Contractor. Proponent may also conduct environmental monitoring in relation to air quality management through inspections and audits.	Environmental inspection checklists, internal audit reports (see Section 5.2.3), confirming that reasonable steps are being taken to minimise construction noise emissions.
Erosion and sedimentation monitoring	SSD Condition B20 & B21 EPL 22077 Condition O4.3	EMS Table 5.1 Contractors CEMP Proponent Soil and Water Management Plan (SWMP)	Throughout construction, the performance and effectiveness of erosion and sediment controls will be visually monitored by way of monthly environmental inspections, or following rain events.	During weekly environmental inspections. Post-rainfall inspections. During internal audits, as required.	Contractor. Proponent may also conduct environmental monitoring/internal audits in relation to erosion and sediment controls through inspections and audits.	Environmental inspection checklists, internal audit reports (see Section 5.2.3), documenting that erosion and sediment controls are performing effectively.
Biodiversity: Monitoring compliance with the impact minimisation measures in the Biodiversity Management Plan	SSD Condition B23	SCWF Biodiversity Management Plan Contractors CEMP	Monitoring the implementation and effectiveness of the biodiversity management measures within the BMP (refer to Section 8 of the BMP). Requires monitoring of: <ul style="list-style-type: none"> Clearing of native vegetation, including progressive tracking 	Monitoring in accordance with Table 8.1 of the BMP. Also, during weekly environmental inspections. Vegetation clearing and disturbance register to be updated at least fortnightly.	Contractor. The Proponent may also conduct monitoring through inspections and audits.	Environmental inspection checklists. Vegetation clearing and disturbance register. Internal audit reports (see Section 5.2.3).

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
			<p>of clearing and disturbance area impacts.</p> <ul style="list-style-type: none"> • Impacts to key fauna habitats • Impacts to fauna • Indirect impacts to fauna • Rehabilitation and revegetation activities • The protection of native vegetation and key fauna habitat outside the approved disturbance area • Salvage and reuse of biodiversity resources • Collecting and propagating seed (where relevant) • Weeds and feral pests • Erosion • Bushfire preparedness. 			
Bird and bat impact monitoring	SSD Condition B27	SCWF Bird and Bat Adaptive Management Plan	Monitoring of the effectiveness of the measures within the BBAMP, and any bird and bat strikes on site. An annual report will be prepared to document the results of the operational monitoring.	Frequency of monitoring will be set out in the BBAMP, which will be prepared prior to commencement of commissioning.	The Proponent.	Reporting outputs will be set out in the BBAMP.

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Aboriginal and non-aboriginal heritage monitoring	SSD Condition B28 & B29	SCWF Heritage Management Plan Contractors CEMP	Monitoring the implementation and effectiveness of the Heritage management measures within the HMP (refer to Section 6 of the HMP). Monitoring to ensure no-go zones are demarcated and that the demarcation controls/barriers are intact / undamaged and not breached.	Daily during any work activities occurring near heritage no-go zones. During weekly environmental inspections.	Contractor. The Proponent may also conduct environmental monitoring in relation to heritage through inspections and audits.	As set out in the SCWF HMP. Environmental inspection checklists. Internal audit reports (see Section 5.2.3).
OSOM Transport monitoring	SSD Condition B30 & B32	SCWF Traffic Management Plan Contractors CEMP	Monitoring to ensure all OSOM vehicles associated with the development are travelling to and from the site in accordance with the approved OSOM Route per Appendix 7 of the Development Consent and as described in the TMP (refer to Section 4 and Section 5 of the TMP).	Ongoing daily monitoring for the duration of OSOM deliveries. During weekly environmental inspections.	Contractor. The proponent may also conduct monitoring in relation to OSOM movements through site inspection and audits.	OSOM permits. Contractor records. Internal audit reports (see Section 5.2.3).
Site Access monitoring	SSD Condition B31 & B32	SCWF Traffic Management Plan Contractors CEMP	Monitoring to ensure that all heavy and light vehicles associated with the development access the site in accordance with Condition B31 of the Development Consent and as described in the TMP.(refer to Section 4.2 of the TMP)	Ongoing daily monitoring for the duration of the development. During weekly environmental inspections.	Contractor. The proponent may also conduct monitoring in relation to vehicle movements through site inspection and audits.	Environmental inspection checklists. Contractor records. Internal audit reports (see Section 5.2.3).

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Traffic monitoring	SSD Condition B36	SCWF Traffic Management Plan Contractors CEMP	Monitoring of the effectiveness of the measures within the TMP (refer to Sections 7 and 9 of the TMP).	During weekly environmental inspections.	Contractor. The proponent may also conduct monitoring in relation to traffic management through site inspection and audits.	Environmental inspection checklists. Internal audit reports (see Section 5.2.3).
Monitoring Asset Protection Zones	SSD Condition B46	SCWF Emergency Plan Contractors CEMP	Visual monitoring of established Asset Protection Zones to ensure maintenance requirements are met as detailed in the Emergency Plan.	Ongoing during construction During weekly environmental inspection.	Contractor. The Proponent may also conduct environmental monitoring in relation to proper maintenance of APZs.	Environmental inspection checklists. Internal audit reports (see Section 5.2.3).
Monitoring for bushfire danger	SSD Condition B47	SCWF Emergency Plan Contractors CEMP	RFS websites will be monitored to determine Total Fire Ban days and Fire Danger Ratings relevant to the Project Site during the bushfire season.	Daily during works during the bushfire season.	Contractor.	Daily pre-start meeting materials.

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Waste management monitoring	SSD Condition B49 EPL 22077 Condition L2.1	EMS Table 5.1 Contractors CEMP	Visual monitoring to ensure that waste is being sorted, stored, handled, transported and disposed in accordance with the requirements of the Development Consent, EPL 22077 and requirements of the NSW EPA's <i>Waste Classification Guidelines</i> .	Daily during construction. During weekly environmental inspections.	Contractor. The Proponent may also conduct environmental monitoring in relation to waste management.	Environmental inspection checklists. Audit reports, documenting that waste is being appropriately managed.
Accommodation and employment status	SSD Condition B50	SCWF Accommodation and Employment Strategy	Documentation monitoring of the effectiveness of the AES over the life of the development, including monthly monitoring during construction.	Monthly throughout construction. Every three years from commencement of operation until commencement of decommissioning.	Contractor. The Proponent will monitor throughout the operational life of the development.	Monthly Contractor reports. Internal audit reports (see Section 5.2.3).
Monitoring of exposed areas	SSD Condition B52	EMS Table 5.1 Contractors CEMP	Visual monitoring to ensure that the total area of exposed ground is kept to the minimum practicable extent at all times.	Weekly during construction During weekly environmental inspections.	Contractor. The Proponent may also conduct environmental monitoring in relation to minimising the total area exposed, through inspections and audits.	Environmental inspection checklists. Internal audit reports (see Section 5.2.3), documenting that work is being conducted in a way that minimises exposure.

Type of Monitoring	Condition Reference	Management Plan Reference	Monitoring Requirement and Method	Timing / Frequency	Responsibility	Reporting Output and Submission Requirements
Monitoring of rehabilitation outcomes	SSD Condition B52	SCWF Biodiversity Management Plan Contractors CEMP	Visual monitoring of rehabilitation activities to ensure that interim or permanent measures are effectively minimising dust generation, soil erosion, or weed incursion.	Weekly during rehabilitation phase of the development. During environmental inspections.	Contractor. The Proponent may also conduct environmental monitoring in relation to the success of interim and permanent rehabilitation measures.	Environmental inspection checklists. Internal audit reports (see Section 5.2.3), documenting that rehabilitation is meeting the objectives of the BMP and the Rehabilitation Management Program (Section 6.9.4 of the BMP).
Independent Environmental Audits	SSD Condition C14 EPBC Condition 41 to 48	EMS Section 5.2.1 and 5.2.2	Independent Environmental Audit in accordance with Section 5.2.1 and the Departments <i>Independent Audit Post Approval Requirements</i> (May 2020), and Section 5.2.2 of the Commonwealth department <i>Independent Audit and Audit Report Guidelines</i> .	Frequency of independent audits varies between the SSD and EPBC approval. Refer Section 5.2.1 and 5.2.2 for the specific frequency requirements	The Proponent	Report submission timing and publication requirements varies between the SSD and EPBC Approval. Refer to Section 5.2.1 and 5.2.2 for the timing to submit Independent audit reports and timing to publish the independent audit reports on the public website.
Internal Project Environment Audits	SSD Condition C1	EMS Section 5.2.3	Internal audit conducted in accordance with SCWF audit schedule (to be developed).	Refer to Section 5.2.3	The Proponent	Internal Audit report – to be provided to the Project Manager.

5.4 Reporting and Notification Obligations

A summary of the reporting and notification obligations from respective Project approvals is provided in **Table 5.2**.

Table 5.2: Reporting and Notification Obligations – Development Consent, EPBC Approval and EPL 22077

Condition	Report / notification description	Timing	Report / notify to
Development Consent (SSD-41134610)			
B38	<p>Prior to the construction of any wind turbine or wind monitoring mast, the Applicant must provide the following information to CASA, Airservices Australia, DoD, NSW Rural Fire Service, the RAAF and NPWS (together the authorities):</p> <ol style="list-style-type: none"> co-ordinates in latitude and longitude of each wind turbine and mast; the final height of each wind turbine and mast in Australian Height Datum; ground level at the base of each wind turbine and mast in Australian Height Datum; confirmation of compliance with any OLS; and details of any proposed aviation hazard lighting. 	Prior to constructing any wind turbine or wind monitoring mast.	Civil Aviation Safety Authority (CASA), Airservices Australia and the RAAF.
B39	<p>Within 30 days of the practical completion of any wind turbine or mast, the Applicant must:</p> <ol style="list-style-type: none"> provide confirmation to the authorities that the information that was previously provided remains accurate; or update the information previously provided. 	Within 30 days of the practical completion of any wind turbine or mast.	Civil Aviation Safety Authority (CASA), Airservices Australia and the RAAF.
B46 (d)	Notify the relevant local emergency management committee following construction of the development, and prior to commencing operations	Following construction and prior to commencing operations.	Dubbo Regional Shire - Local Emergency Management Committee.
C7	<p>The Applicant must notify the Department of the date of commencement, or cessation, of construction, operations, upgrading or decommissioning phases.</p> <p>If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.</p>	<p>Prior to commencing the construction, operations, upgrading or decommissioning phases.</p> <p>Prior to commencing construction of the Wind Farm (Stage 1b) and Battery Storage Facility (Stage 2).</p>	<p>DPHI, via Major Projects website portal.</p> <p>DPHI, via Major Projects website portal.</p>

Condition	Report / notification description	Timing	Report / notify to
C8	The Applicant must submit detailed plans of the final layout of the development, which include: <ul style="list-style-type: none"> a. details on siting of wind turbines, including micro-siting of any wind turbines and/or ancillary infrastructure (including wind monitoring masts); b. the GPS coordinates of the wind turbines; and c. showing comparison to the approved layout. 	Prior to commencing construction (Stage 1b).	DPHI, via Major Projects website portal.
C9	The Applicant must submit work as executed plans of the development and showing comparison to the final layout plans to the Planning Secretary.	Prior to commencing operations, or prior to upgrades of any turbines or ancillary infrastructure.	DPHI, via Major Projects website portal.
C10	Notification & reporting of incidents – as described in Sections 4.5 of this EMS.	Within 24 hours after the Applicant becomes aware of the incident	DPHI, via Major Projects website portal.
C11	Provide a subsequent incident report in accordance with Appendix 8 (Incident Notification and Reporting Requirements) -as described in Sections 4.5 of this EMS.	Within seven days of making the incident notification	DPHI, via Major Projects website portal
C12	Notification and reporting of non-compliances – as described in Section 5.5 of this EMS.	Within seven (7) days after the Applicant becomes aware of the non-compliance.	DPHI, via Major Projects website portal.
C13	The Applicant must notify in writing any non-associated residence within 5 km of any approved wind turbine of their rights under condition B1.	Prior to commencing construction (Stage 1b).	The relevant landowners, per the condition.
C14	Independent Audit reports will be prepared and submitted to the DPE in accordance with the requirements of the Independent Audit Post Approval Requirements (2020).	Per the requirements of the Independent Audit Post Approval Requirements (2020).	DPHI, via Major Projects website portal.
EPBC Approval 2022/09387			
Condition 18	Notify the Department of the detection of any injury or mortality to EPBC Act listed bird species within the Action area.	Within 10 business days of the detection of any injury or mortality	Notify AG DCCEEW, via email: epbcmonitoring@dcceew.gov.au
Condition 25	Notify the Department in writing of any change to the NSW Approval conditions that may relate to protected matters. Such notification must include a copy of the changed NSW Approval conditions showing what changes have been made.	Within 10 business days of such a change to conditions coming into effect	Notify and report to AG DCCEEW, via email: epbcmonitoring@dcceew.gov.au
Condition 26	Notify the Department electronically of the date of commencement of the Action	Within 5 business days following commencement of the Action	Notify AG DCCEEW, via email: epbcmonitoring@dcceew.gov.au

Condition	Report / notification description	Timing	Report / notify to
Condition 33 and 36	<p>The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period) and at time of notification of completion of the action. The approval holder must ensure each compliance report includes:</p> <ul style="list-style-type: none"> a. accurate and complete details of compliance and any non-compliance with: <ul style="list-style-type: none"> i) each condition imposed under the NSW Approval, if a condition attached to this approval decision requires compliance with that NSW Approval condition, ii) each condition attached to this approval decision, and iii) all commitments made in each plan, b. a schedule of all plans in effect in relation to these conditions during the ACR period, c. accurate and complete details of how each plan was implemented during the ACR period, and d. if any incident occurred, accurate and complete details of each incident. 	<p>Within 20 business days following the end of each ACR period.</p> <p>ACR period is 4 March 2025 to 3 March 2026</p>	<p>Publish the compliance report on the Project website:</p> <p>https://www.squadronenergy.com/our-projects/uungula-wind-farm</p> <p>Notify AG DCCEEW, via email: epbcmonitoring@dcceew.gov.au</p>
Condition 39	<p>Notification and reporting of any non-compliance relating to the EPBC Approval, as set out in Section 5.5 of this EMS.</p> <p>Notification and reporting of any incident relating to the EPBC Approval, as set out in Section 4.5 of this EMS.</p>	<p>within 1 business day of becoming aware of any incident or non-compliance.</p>	<p>Notify and report to AG DCCEEW, via email:</p> <p>Non-Compliance: Environment.compliance@dcceew.gov.au Incident: epbcmonitoring@dcceew.gov.au</p>
Condition 40	<p>Further details of any incident or non-compliance relating to the EPBC Approval, as set out in Section 5.5 of this EMS.</p> <p>Further details of any incident relating to the EPBC Approval, as set out in Section 4.5 of this EMS.</p>	<p>Within 7 business days of notification of an incident or non-compliance</p>	<p>Report to AG DCCEEW, via email:</p> <p>Non-Compliance: Environment.compliance@dcceew.gov.au Incident: epbcmonitoring@dcceew.gov.au</p>
Condition 44	<p>For each independent audit conducted under Condition 41 of the EPBC Approval, submit an audit report to the Department as set out in Section 5.2.2 of this EMS</p>	<p>Within 3 months following the end of each audit period.</p>	<p>Report to AG DCCEEW, via email: epbcmonitoring@dcceew.gov.au</p> <p>Audit section: audit@dcceew.gov.au</p>
Condition 46	<p>The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.</p>	<p>Within 10 business days of the date the department agrees to that audit report in writing</p>	<p>Publish the report on the Project website:</p> <p>https://www.squadronenergy.com/our-projects/uungula-wind-farm</p>

Condition	Report / notification description	Timing	Report / notify to
Condition 47	Notify the department when 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.	Within 5 business days of the date the audit report is published on the website,	Notify AG DCCEEW, via email: epbmonitoring@dcceew.gov.au
Condition 49	After the completion of the action, the approval holder must notify the Department in writing and provide completion data. Submit any spatial data that comprises completion data as a shapefile.	Within 20 business days after the completion of the action.	Notify and report to AG DCCEEW, via email: epbmonitoring@environment.gov.au
Condition 50	Notify the department electronically that the approval is due to expire. <i>Note: Section 145C of the EPBC Act entitles the approval holder to request an extension to the period of effect of this approval.</i>	60 business days prior to the expiry date of this approval (4 March 2060)	Notify AG DCCEEW, via email: epbmonitoring@environment.gov.au
EPL 22077			
L3.2	On becoming aware of the need to undertake emergency work as per condition L3.2, the proponent must notify the EPA.	On becoming aware of Emergency Works.	Telephoning the Environment Line service 131 555
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Completed and ongoing.	The public, via the Project website, project newsletters, email communications etc.
R1.1	The licensee must complete and supply to the NSW EPA an Annual Return for the EPL 22077.	No later than 60 days after the end of each reporting period.	Notify the NSW EPA via eConnect EPA or by registered Post. Publish the annual return on the Project website: https://www.squadronenergy.com/our-projects/uungula-wind-farm
R2.1	The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Immediately after becoming aware of actual or potential threat of material harm to the environment.	Telephoning the Environment Line service 131 555
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	Within 7 days of the date on becoming aware of the incident.	Notify NSW EPA, Via email: info@epa.nsw.gov.au
G2.3	The licensee is to inform the EPA of the contact number(s) within 3 months of the licence being issued.	Within 3 months of the licence being issued.	Notify the NSW EPA via eConnect EPA

Condition	Report / notification description	Timing	Report / notify to
G2.4	The licensee must inform the EPA in writing of the appointment of any subsequent contact persons, or changes to the person's contact details as soon as practicable and in any event within fourteen days of the appointment or change	As soon as practicable and in any event within fourteen days of the appointment or change.	Notify the NSW EPA via eConnect EPA

5.5 Non-Compliance and Corrective and Preventative Action

5.5.1 Non-Compliance Identification and Investigation

In accordance with the Development Consent, a non-compliance is defined as:

An occurrence, set of circumstances or development that is a breach of this consent but is not an incident.

A non-compliance with the EPBC Approval is a non-compliance with any condition of the EPBC Approval or a commitment made in a plan required by the EPBC Approval (i.e. EMS, BMP and BBAMP).

Non-compliances may be identified in a number of ways, such as internal or external audit, inspection, incident investigation or review.

Where a non-compliance has been identified:

1. The non-compliance will be notified to the SCWF Project Manager and SCWF Project Environmental Advisor.
2. The SCWF Project Manager and SCWF Project Environmental Advisor (or delegate) will ensure that the non-compliance is investigated by the responsible party (the party responsible for the non-compliance) in order to ascertain the source, reason, and implications of the non-compliance.
3. Corrective / preventive actions will be developed and implemented by the responsible party, in consultation with the Proponent, and may include:
 - amendment of the EMS or relevant management strategy, plan, program, or procedure;
 - additional control measures;
 - staff training;
 - disciplinary actions.
4. The responsible party will prepare and submit a report to the Proponent which documents the above information.

5.5.2 Notification of Non-Compliance to NSW Planning Secretary (DPHI)

In accordance with Development Consent Condition C12, the Proponent will provide written notification to the NSW Planning Secretary via the Major Project website within seven days of becoming aware of a non-compliance with the Development Consent. The written notification will identify the Project and the application number, the condition of consent that the Project is in non-compliance with, the reason for which the Proponent does not comply, the reasons for the non-compliance (if known), and what actions have been taken, or will be taken, to address the non-compliance.

It is noted that a non-compliance which has already been notified as an incident does not need to be notified as a non-compliance.

5.5.3 Notification of Non-Compliance to Commonwealth Department (AG DCCEEW)

In accordance with EPBC Approval Condition 39, the Proponent will provide a written notification to AG DCCEEW of any non-compliance with the conditions of the EPBC Approval, or the commitments made in the related plans (EMS, BMP, and BBAMP).

The notification will be given to AG DCCEEW within one (1) business day of becoming aware of any incident and will provide the following information.:

- any condition or commitment made in a plan which has not been, or may have not been, complied with,
- a short description of the incident, and

- the location (if applicable, including co-ordinates), date and time of the incident.

In accordance with EPBC Approval Condition 40, the Proponent will provide further written information to AG DCCEEW of the non-compliance. The further notification will be provided within seven (7) business days of notification of an incident, and it will specify:

- all corrective measures and investigations which the approval holder has already taken in respect of the incident,
- the potential impacts of the incident,
- the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and
- any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.

5.5.4 Compliance Tracking Matrix

A compliance tracking matrix is an internal tool used to record and track compliance with the various Project statutory approvals. The SCWF Project Environmental Advisor will maintain the compliance tracking matrix throughout the life of the Project.

The compliance tracking matrix will undergo routine review and update by the SCWF Project Environmental Advisor, to reflect the compliance status of the Project. The matrix will also be updated as required, in response to the outcomes of environmental monitoring (refer to **Section 5.3**), non-compliance identification (**Section 5.5**) or on satisfying the compliance obligations under the conditions of Project statutory approvals / additional approvals and licences.

6 Review Management

In accordance with Development Consent Condition C2, the EMS (and any other relevant plans and programs) will be reviewed and, if necessary, revised within three months of the submission of:

- Submission of an incident report under Condition C10;
- Submission of an audit report under Condition C14; or
- Any modification to the conditions of the Development Consent.

If the EMS is revised, it will be submitted to the NSW Planning Secretary for approval in accordance with Development Consent Condition C1. In accordance with Development Consent Condition C1 and C15, if the revised strategy is approved by the NSW Planning Secretary, the revised EMS will be implemented and will be published to the Project website.

7 References

NSW Department of Planning and Environment, 2020. *Independent Audit Post Approval Requirements*

Clean Energy Council, 2018. *The Best Practice Guidelines for Implementation for Wind Energy Project in Australia*.

International Standards Organisation (ISO) (2015) *ISO 14001:2015 Environmental Management*.

State of New South Wales and the NSW Environment Protection Authority (2022). *Guideline: Pollution Incident Response Management Plans*.

Spicer Creek Wind Farm – Environmental Impact Statement, prepared by Umwelt (Australia) Pty Limited on behalf of Spicers Creek Wind Farm Pty Ltd, dated July 2023.

Spicer Creek Wind Farm – Submissions Report, prepared by Umwelt (Australia) Pty Limited on behalf of Spicers Creek Wind Farm Pty Ltd, dated December 2023.

Spicer Creek Wind Farm – Biodiversity Management Plan, prepared by Umwelt (Australia) Pty Limited on behalf of Spicers Creek Wind Farm Pty Ltd.

Spicer Creek Wind Farm – Heritage Management Plan, prepared by Umwelt (Australia) Pty Limited on behalf of Spicers Creek Wind Farm Pty Ltd.

Spicer Creek Wind Farm – Traffic Management Plan, prepared by Samsa Consulting on behalf of Spicers Creek Wind Farm Pty Ltd.

Appendix A Squadron Energy Environmental Policy

2 Environmental Policy Statement

At Squadron Energy, our purpose is to improve the environment for current and future generations by leading Australia's transition to renewable energy. Our vision is to be Australia's leading renewable energy company. We are committed to protecting and enhancing the environment through sustainable development principles, sound risk management and continual improvement. We take a proactive approach to minimising our environmental impacts and managing our environmental footprint. We aim to ensure our activities contribute positively to environmental outcomes now and for future generations.

SQE's Code of Conduct and our Values of Integrity, Generating Ideas, and Empowerment, each underpin and strengthen our commitment to environmental protection and preservation, as set out below.

2.1 Act with Integrity

- Maintain the Environmental Management System (EMS) and its accreditation to ISO 14001:2015 to ensure there is an effective framework for continual improvement.
- Ensure an effective mechanism exists for setting and reviewing environmental objectives and targets.
- Conduct regular inspections, audits, and management reviews to monitor the effectiveness and suitability of controls and the EMS.
- Comply with all relevant environmental legislation and regulations and adopt appropriate standards.
- Ensure operational practices are sustainable, reduce environmental harm, and promote efficient use of natural resources, energy, and materials
- Encourage environmentally responsible procurement by engaging suppliers and contractors who align with our environmental and social values, including commitments to sustainability, human rights, and transparent practices.
- Minimise and handle any environmental incidents and emergencies should they occur, including appropriate and prompt reporting to relevant stakeholders.
- Establish an Environmental Team, with capabilities and capacity to deliver on the objectives of this Policy.
- Document environmental matters associated with operations, and communicating environmental outcomes to Staff, customers, contractors, and the community.

2.3 Generate Ideas

- Undertake environmental assessment early to ensure we can identify the best opportunities to avoid, minimise, mitigate, and offset (as last resort) our environmental impacts.
- Implement risk management processes through which we identify, assess, and manage environmental hazards, risks and opportunities associated with our operations, including those related to a changing climate.
- Keep abreast of best practice environmental measures and techniques to minimise environmental footprint, including protecting biodiversity and heritage values, and minimising emissions and waste.
- Implementing robust 'lessons learned' processes for all projects, to support continual improvement to environmental outcomes during the delivery of future projects.
- Apply forward-looking environmental planning, including lifecycle thinking, to reduce environmental harm and improve long-term resilience of projects, particularly in the face of environmental variability and climate-related risks and opportunities

2.2 Empower our People

- Establish a Health, Safety, Environment and Sustainability Committee, to assist the Board of SQE to fulfil its oversight responsibility to ensure we achieve the commitments in this Policy.
- Foster awareness and capability across the organisation to adapt to evolving environmental challenges and deliver innovative, sustainable project outcomes

Rob Wheals, CEO
August 2025

Appendix B Additional Compliance Requirements

Appendix B.1 NSW Approval SSD 41134610

Condition	Condition wording	Commitment to Compliance
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT		
A1	In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development.	All mitigation and management measures outlined within this EMS and associated Environmental Management Plans and Strategies will be implemented to minimise any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development
APPLICABILITY OF GUIDELINE		
A15	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	The guidelines, protocols, Australian Standards, and policies referenced in the conditions of this consent, in the form they are in at the date of consent will be complied. Furthermore, the Proponent commits to implementing any updated, revised, or replacement versions of such guidelines, protocols, Standards, or policies if directed by the Planning Secretary in relation to ongoing monitoring and management obligations.
COMPLIANCE		
A16	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	The Applicant will ensure that all employees, contractors, and sub-contractors are inducted and made aware of, and instructed to comply with, the conditions of this consent relevant to the activities they undertake in relation to the development.
VISUAL		
B1	For a period of 7 years from the commencement of construction, the owner of any non-associated residence within 5 km of any wind turbine identified in the Final Layout Plan 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 (examples include but are not limited to landscaping and vegetation screening) in consultation with the owner. The mitigation measures must: <ul style="list-style-type: none"> a. be reasonable and feasible; 	The Applicant will for seven years from construction commencement, respond to written requests from owners of non-associated residences within 5 km of wind turbines to implement reasonable and feasible visual impact mitigation measures (e.g., landscaping, vegetation screening) in consultation with the owner, considering bushfire risk, and implement measures within 12 months unless otherwise agreed. Disputes may be referred to the Planning Secretary.

Condition	Condition wording	Commitment to Compliance
	<ul style="list-style-type: none"> b. be 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; c. consider bushfire risk (including the provisions of Planning for Bushfire Protection 2019); and d. be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise. <p>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 Planning Secretary for resolution.</p> <ul style="list-style-type: none"> • <i>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.</i> • <i>The identification of appropriate visual impact mitigation measures will be more effective following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction, it is recommended owners consider whether there is benefit in delaying such a request until the relevant wind turbines are visible from their residence or its curtilage.</i> 	
NOISE AND VIBRATION		
B7	<p>The hours of construction activities specified in condition B5 of this approval may be varied with the prior written approval of the Planning Secretary. Any request to alter the hours of construction must be:</p> <ul style="list-style-type: none"> a. considered on a case-by-case or activity-specific basis; b. accompanied by details of the nature and justification for activities to be conducted during the varied construction hours; c. accompanied by written evidence that appropriate consultation with potentially affected sensitive receivers and notification of Councils (and other relevant agencies) has been and will be undertaken; d. accompanied by evidence that all feasible and reasonable noise mitigation measures have been put in place; and e. accompanied by a noise impact assessment consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009), or its latest version 	<p>The Applicant will only seek variation to construction hours with prior written approval of the Planning Secretary. The request of variation will include the information listed in Condition B7.</p>
B10	<p>The Applicant must comply with the following vibration limits:</p> <ul style="list-style-type: none"> a) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); 	<p>The Applicant will ensure construction vibration comply with the vibration limits. Contractors' CEMPs/CNVPs will address this requirement</p>

Condition	Condition wording	Commitment to Compliance
	<p>b) BS 7385 Part 2-1993 “Evaluation and measurement for vibration in buildings Part 2” as they are “applicable to Australian conditions”; and</p> <p>c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration – effects of vibration on structures (for structural damage).</p>	
AIR		
B18	<p>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.</p> <p><i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licenses before commencing any works which intercept or extract groundwater or surface water (unless an exemption applies).</i></p>	<p>The Applicant will ensure sufficient water is available for Stage 1a and comply with water requirements. Contractors’ will identify and obtain all necessary water licenses or permits.</p>
WATER POLLUTION AND EROSION AND SEDIMENT		
B19	<p>Unless an EPL authorises otherwise, the Applicant must comply with Section 120 of the POEO Act.</p> <p><i>Note: Section 120 of the POEO Act makes it an offence to pollute any waters.</i></p>	<p>The Applicant has obtained an EPL 22077</p> <p>The implementation of this EMS and associated plans will ensure compliance with Section 120 of the POEO Act.</p>
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS		
C3	<p>With the approval of the Planning Secretary, the Applicant may:</p> <ol style="list-style-type: none"> prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	<p>The Applicant will be developed in two stages:</p> <ul style="list-style-type: none"> Stage 1: Wind Farm and associated infrastructure with the exception of the ‘Battery Storage Facility’. Stage 2: Battery Storage Facility. <p>The Strategies, Plans and Programs will be prepared and submitted in accordance with the Table in Appendix C.</p> <p>Updated Strategies, Plans and Programs will be submitted to the Planning Secretary for approval in accordance with Condition(c).</p>
C4	<p>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.</p>	<p>The Applicant will stage or update Strategies, Plans or Programs in consultation with the relevant identified party, unless the Secretary has agreed that the consultation is not required.</p>

Condition	Condition wording	Commitment to Compliance
C5	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Updated Strategies, Plans and Programs will supersede the previous versions of them and will be implemented in accordance with the relevant condition. Also, the plan will be updated on the Project website in accordance with Condition C15.
C6	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this consent if those requirements are not applicable to the particular stage.	<p>The Applicant will be developed in two stages:</p> <ul style="list-style-type: none"> • Stage 1: Wind Farm and associated infrastructure with the exception of the ‘Battery Storage Facility’. • Stage 2: Battery Storage Facility. <p>The Strategies, Plans and Programs will be prepared and submitted in accordance with the Table in Appendix C. The plans will then be updated where required in accordance with the Table in Appendix C</p>

Appendix C Approval for staging of plans

Zeina Jokadar
 Environmental Advisor
 Spicers Creek wind Farm
 Level 1, 25 Bolton St
 Newcastle, NSW, 2300

19/08/2025

Subject: Spicers Creek Wind Farm

Dear Ms Jokadar

I refer to your letter dated 20 March 2025 requesting approval to prepare and submit Strategies, Plans and Programs on a staged basis, in accordance with Schedule 2, Condition C3(a) and C6 of the Development Consent (SSD-41134610) for the Spicers Creek Wind Farm. I also acknowledge your response to the Department’s review comments and request for additional information.

It is understood that Squadron Energy is seeking the Planning Secretary’s agreement to construct the project in two stages commencing with the wind farm followed by the battery energy storage system (BESS).

The Department has carefully considered your request and is satisfied it is necessary to ensure the timely delivery of the project. Accordingly, as nominee of the Planning Secretary, I agree to the staging of the development and management plans as shown in Table 1.

Table 1 *Project Staging and Management Plan Requirements*

Stage	Description	Management Plan/ Strategy Requirements (prior to commencement of Stage)	Notes
Stage 1a	Pre-construction activities (road upgrades of maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying).	<ul style="list-style-type: none"> • Environmental Management Strategy Stage 1a • Biodiversity Management Plan (Stage 1 and Stage 2) • Heritage Management Plan (Stage 1 and Stage 2) • Traffic Management Plan (Stage 1a & 1b) 	Refer to definitions in the Development Consent for exclusions from construction.
Stage 1b	Commence construction of the wind farm (excluding high-risk heavy vehicles requiring an escort).	<ul style="list-style-type: none"> • Environmental Management Strategy (Stage 1b, 1c, 1d and Stage 2) • Soil & Water Management Plan (Stage 1 and Stage 2) • Emergency Management Plan (Stage 1) 	

Stage	Description	Management Plan/ Strategy Requirements (prior to commencement of Stage)	Notes
		<ul style="list-style-type: none"> Accommodation and Employment Strategy (Stage 1 & 2) 	
Stage 1c	Continue construction of the wind farm including high-risk heavy vehicles requiring an escort.	<ul style="list-style-type: none"> Traffic Management Plan (Stage 1c and 1d) 	Consultation with TfNSW, EnergyCo and Councils regarding high-risk heavy vehicles requiring an escort is required prior to this stage.
Stage 1d	Commence operation of the wind farm.	<ul style="list-style-type: none"> Bird and Bat Adaptive Management Plan 	Updating and further sub-staging may be required if the wind farm commences operation while construction of the BESS is completed.
Stage 2a	Commence construction of the battery energy storage system (BESS).	<ul style="list-style-type: none"> Fire Safety Study (Stage 2 and 3) Emergency Management Plan (Stage 2 and 3) 	Prior to commencing Stage 2a all Stage 1 plans/strategies must be reviewed and updated where required, to incorporate any information or details relevant to the construction of battery storage system.
Stage 2b	Operation of the BESS.		Prior to commencing Stage 2b, all Stage 1 and 2a plans/strategies must be reviewed and updated where required, to incorporate any information or details relevant to the operation of battery storage system.
Stage 3	Decommissioning at end of project life.		Prior to carrying out any decommissioning activities on site, all strategies, plans, and programs will need to be reviewed and updated as required.

Please note the Environmental Management Strategy should be prepared for Stage 1a to ensure the structure of the EMS is established from the start of activities on site.

It is noted that the FSS must be approved by the Planning Secretary, including written confirmation from FRNSW that it meets the requirements, prior to Stage 2a including the delivery, storage and/or installation of any batteries on site.

It is also noted that all management plans should be prepared, reviewed and updated in accordance with the requirements of the consent, including consultation and engagement with relevant agencies and representatives.

If you wish to discuss the matter further, please contact Keren Halliday on (02) 82896444.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'NB', with a long horizontal line extending to the right.

Nicole Brewer
Director
Energy Assessments

As nominee of the Planning Secretary

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

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.

