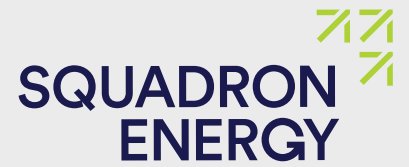


UUNGULA WIND FARM



ENVIRONMENTAL MANAGEMENT STRATEGY

21/07/26



Revision Control

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Key Terms

Table 1 Key Terms

Term	Definition
Ancillary infrastructure	Infrastructure necessary for the operation of the development: • Battery storage; • Collector substations; • Switching stations; • Permanent offices; • Electricity transmission lines; • Site compounds; • Underground and overhead electricity transmission lines; • Communication cables (including control cables and earthing); • Wind monitoring masts; and • Internal roads.
Applicant	See: Proponent.
BBAMP	Bird and Bat Adaptive Management Plan
BC Act	NSW Biodiversity Conservation Act 2016
BMP	Biodiversity Management Plan
CCC	Community Consultative Committee
CEEC	Critically endangered ecological community, as defined under the BC Act or EPBC Act
CEMP	Construction Environmental Management Plan
Council	Dubbo Regional Council
Cth DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
Development Application	Refer to the definition of EIS (below), the Development Application was formed by those component parts
Development Consent	SSD-6687
Development Footprint	The area of physical disturbance associated with the construction of the Project, comprised of temporary impacts and permanent impacts.
DPE	NSW Department of Planning and Environment (Now DPHI)
DPHI	Department of Planning, Housing and Infrastructure (previously DPE)
EIS	The environment impact statement for Ungula Wind Farm dated May 2020, as amended by: the Submissions Report dated November 2020; the Amendment Report dated November 2020; the additional information provided by the Applicant to the Department dated 22 January 2021, 15 March 2021, 23 April 2021 and 6 May 2021; the Ungula Wind Farm Modification Report dated 17 March 2022, the Ungula Wind Farm Modification 2 Report dated 6 October 2022; and the Ungula Wind Farm Modification 3 Report dated 30 July 2025
EMS	Environmental Management Strategy
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPC	Engineering Procurement and Construction contractor and any principal contracting entity engaged on the Project, i.e. TransGrid

Term	Definition
EPL	Environment Protection Licence
ERP	Emergency Response Plan
HMP	Heritage Management Plan
LGA	Local Government Area
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
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	Uungula Wind Farm Pty Ltd
SQE	Squadron Energy Pty Ltd
TEC	Threatened Ecological Community
The Minister	Minister for Agriculture, Water and the Environment and Energy (Commonwealth)
The Project	Uungula Wind Farm Project
The Secretary	Secretary of Department of Planning and Environment (NSW)
TMP	Traffic Management Plan
UWF	Uungula Wind Farm Pty Ltd
WTG	Wind Turbine Generator

1 Introduction

1.1 Project Overview

The Proponent, Uungula Wind Farm Pty Ltd, has obtained State Significant Development Consent (SSD-6687), for the construction, operation, maintenance, and decommissioning of the Uungula Wind Farm (the Project). The Project comprises up to 93 wind turbine generators (WTGs) and associated infrastructure including, access roads, hardstands, laydown areas, internal electrical reticulation, temporary construction compounds, rock crushing facilities, concrete batching plant(s), a substation, an operations and maintenance facility, overhead transmission line and a switching station.

The Project is located within the Dubbo Regional Local Government Area (LGA), approximately 14 kilometres east of Wellington, NSW.

Refer to Figure 1 for the approved Final Layout Plan submitted to the Department of Planning and Environment (DPE)) in accordance with Development Consent SSD-6687 (the Development Consent) Condition C8.

A full description of the Project is provided in the Environmental Impact Statement (EIS) which can be accessed on the Project website at <https://www.squadronenergy.com/our-projects/uungula-wind-farm>

1.2 Project Staging

The Project will be developed in two stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'.
- Stage 2: Battery Storage Facility.

In accordance with Condition C3 of the Development Consent, the Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2 (refer to Planning Secretary approval at Appendix B).

All other strategies, plans and programs have been submitted and approved for Stage 1, and will be updated for Stage 2 where required.

1.3 Purpose and Objective of this EMS

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

This EMS has been prepared to meet the requirements of condition C1 of the Development Consent and is the overarching plan for the Project which sets out the environmental management strategies for design, construction, operation, and decommissioning of the Project. It describes the environmental management systems and measures intended to protect, minimise, and manage environmental impacts during design, construction, operation and decommissioning. Table 2 provides a reference to the requirements of Condition C1 of the Development Consent and the section of this EMS where it has been addressed.

In addition to this EMS, several environmental subplans required by the Development Consent have been prepared and are defined in Section 2.3 of this EMS. The scope of these subplans provides detailed stage-specific procedures for managing the relevant environmental issues specific to each subplan. The mitigation measures, monitoring methods and reporting procedures are detailed in these subplans and are periodically reviewed as the Project progresses. The subplans have been approved by the NSW Planning Secretary.

This approved EMS will be implemented in accordance with Condition C1 and is published on the Project website <https://www.squadronenergy.com/our-projects/uungula-wind-farm> in accordance with Condition C16 of the Development Consent.

1.4 Application of this EMS

This EMS applies to Stage 1 of the Development (Wind Farm and associated infrastructure, excluding the Battery Storage Facility).

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

The EMS forms the basis of the Construction Environmental Management Plan (CEMP) to be prepared by the EPC Contractor. Further details on the CEMP are provided in Section 2.4 of this EMS.

Table 2 Requirements of Condition C1 of SSD-6687

SSD-6687 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 EMS – whole 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
	d. Set out the procedures that would be implemented to:	
	i. Keep the local community and relevant agencies informed about the operation and environmental performance of the development;	Section 5.1 Section 5.2
	ii. Receive, handle, respond to and record complaints;	Section 5.3
	iii. Resolve any disputes that may arise;	Section 5.4
	iv. Respond to any non-compliance;	Section 6.4
	v. Response to emergencies; and	Section 8
	e. Include:	
	i. Reference to any strategies, plans and programs approved under the conditions of this consent; and	Section 2
	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 6.3
	Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.	Section 2



WTG (69) Project Site Boundary Development Corridor Proposed Powerlines Internal Overhead Line Internal Underground Line Metmast Underground Line External Overhead Line Residences Non-Associated Residence Associated Residence		Public Roads Waterways Access tracks Primary site entrance (RHT) Secondary Intersections Permanent Metmast Batch Plant Collector Sub Extra Work Space Site Compound Switching Sub Temporary Construction Compound		Company SQUADRON ENERGY Title UUNGULA WIND FARM - FINAL LAYOUT PLAN Date 7/11/2023 Projection GDA94 Zn55 Drawing No UWF-02-FLP Rev 2 Ver A Drawn By A GORDIJN Checked By S KIDZIAK Sheet 1 OF 1 Proj Code UWF Size A3	
				SQUADRON ENERGY	

Figure 1 Project Final Layout Plan

2 Environmental Management Framework

2.1 Environmental Management System

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

The SQE Environmental Management System is structured generally in accordance with ISO 14001:2015's process of Plan-Do-Check-Act.

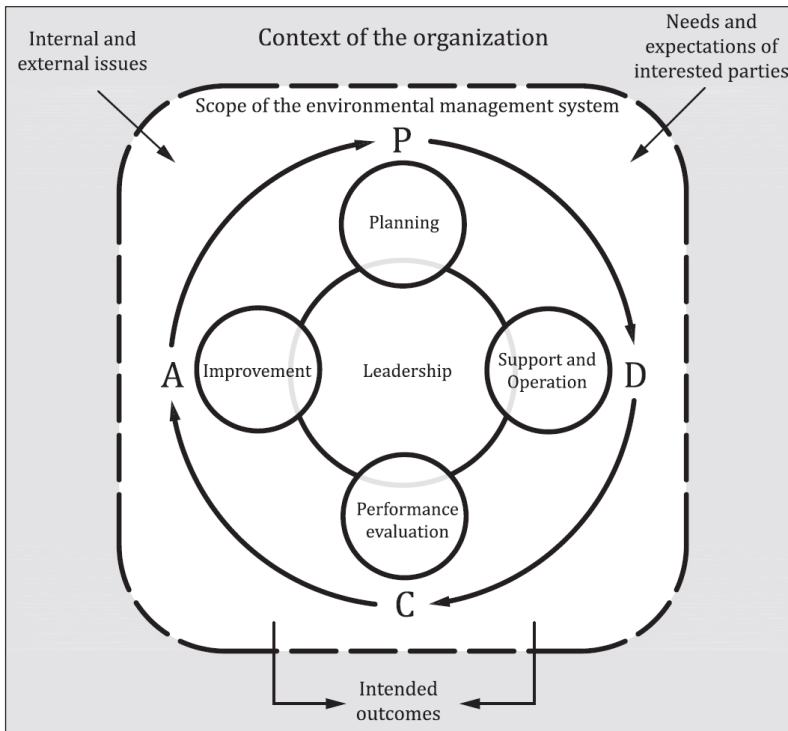


Figure 2 ISO 14001:2015 Plan-Do-Check-Act extract

2.2 Environmental Policy

All Project activities will be undertaken in accordance with the relevant principles of SQE's Environmental Policy (SQE-02-POL-022_Environmental_Policy) which is provided in Appendix C. This policy has been structured generally in accordance with ISO 14001:2015 and outlines SQE'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. It will be periodically reviewed against environmental performance and industry practice.

2.3 Environmental Strategies, Plans and Programs

In addition to this EMS required by Condition C1, several other strategies, plans, and programs (referred to as subplans) have been prepared for the development as required by the Development Consent:

- **Final Layout Plan (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) (Condition B23)**

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

- **Bird and Bat Adaptive Management Plan (BBAMP) (Condition B24)**

This plan provides a program for monitoring potential Project impacts 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. The approved BBAMP will be implemented by the Proponent and Contractors.

- **Heritage Management Plan (HMP) (Condition B26)**

This plan describes the heritage management measures that will be implemented to protect, minimise, and manage impacts associated with the Project, during design, construction and operation. The approved HMP will be implemented by the Proponent and Contractors.

- **Traffic Management Plan (TMP) (Condition B33)**

This plan describes the transport routes to be used for Project related traffic, public road upgrade work requirements, dilapidation survey requirements. The TMP identifies measures 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 provides a driver's code of conduct. The approved TMP will be implemented by the Proponent and Contractors.

- **Emergency Plan (EP) (Condition B42)**

This plan details the fire hazards and risks applicable to the Project, providing measures to prevent or mitigate fires igniting, procedures to be implemented in the event of a fire on site or in the vicinity of the site, bushfire emergency planning and emergency contact details. The Emergency Plan will be implemented by the Proponent and Contractors.

- **Accommodation and Employment Strategy (AES) (Condition B45)**

This plan proposes measures to ensure sufficient accommodation for the Project workforce, providing options to prioritise employment of local workers for construction and operation of the Project, considering potential cumulative impacts associated with other State Significant Development projects in the area. The approved AES will be implemented by the Proponent and Contractors.

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

The approved strategies, plans and programs are available on the Uungula Wind Farm website <https://www.squadronenergy.com/our-projects/uungula-wind-farm>

Additionally, the NSW EPL 21862 requires the following management plans to be prepared for the Development:

- **Construction Noise Management Plan (CNMP)**

This plan identifies potential noise impacts from construction activities, and outlines measures to mitigate these impacts, identifying noise sources, sensitive receivers, and management procedures to meet noise objectives. It includes assessments, mitigation strategies, and treatments. The CNMP will be implemented by the Proponent and Contractors.

- **Noise Management Plan (NMP)**

This plan will be developed prior to the commissioning of the turbines, and will outline measures to monitor, manage, and minimize operational noise emissions, ensuring compliance with relevant conditions. It will include procedures to address noise issues and corrective actions if required. The NMP will be implemented by the Proponent and Contractors.

- **Soil and Water Management Plan (SWMP)**

This plan describes the measures that will be implemented to minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction. The SWMP will be implemented by the Proponent and Contractors.

- **Stormwater Management Scheme (SMS)**

This plan will describe the measures that will be implemented to mitigate the impacts of stormwater runoff from and within the Project Site following the completion of construction activities. The SMS will be implemented by the Proponent and Contractors.

- **Pollution Incident Response Management Plan (PIRMP)**

The Protection of the Environment Operations Act 1997 (POEO Act) requires all holders of Environmental Protection Licences to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). A PIRMP has been prepared as part of Environment Protection Licence (EPL) 21862 and is designed to be a tool to respond in a practised and well-planned manner in the event of a pollution incident at the Uungula Wind Farm, New South Wales (NSW). The PIRMP will be implemented by the Proponent and Contractors.

The Battery Storage Facility will be constructed as a separate Stage of the approved development. In accordance with Condition C3 of the Development Consent, UWF has obtained approval from the Planning Secretary to submit strategies, plans and programs relevant to the Battery Storage Facility on a staged basis (refer to Appendix C).

In accordance with that approval, prior to commencing construction of the Battery Storage Facility, the following documents will be prepared and submitted to the Planning Secretary for approval:

- Fire Hazard Analysis (Condition B38); and
- Fire Safety Study (Condition B39).

2.4 Contractor Environmental Management Plans

As part of the Environmental Management Framework of the Project, the EPC Contractors will prepare and implement a Construction Environmental Management Plan (CEMP) and safety management plans prior to commencing construction. The CEMP will detail stage-specific procedures and plans to address specific requirements of the Project approvals, the overarching EMS, and the associated subplans that are listed in Section 2.3.

Figure 3 below illustrates the relationship between the management plans detailed in Sections 2.3 and 2.4, highlighting how the EPC Contractor's plans align with the UWF Approval plans.

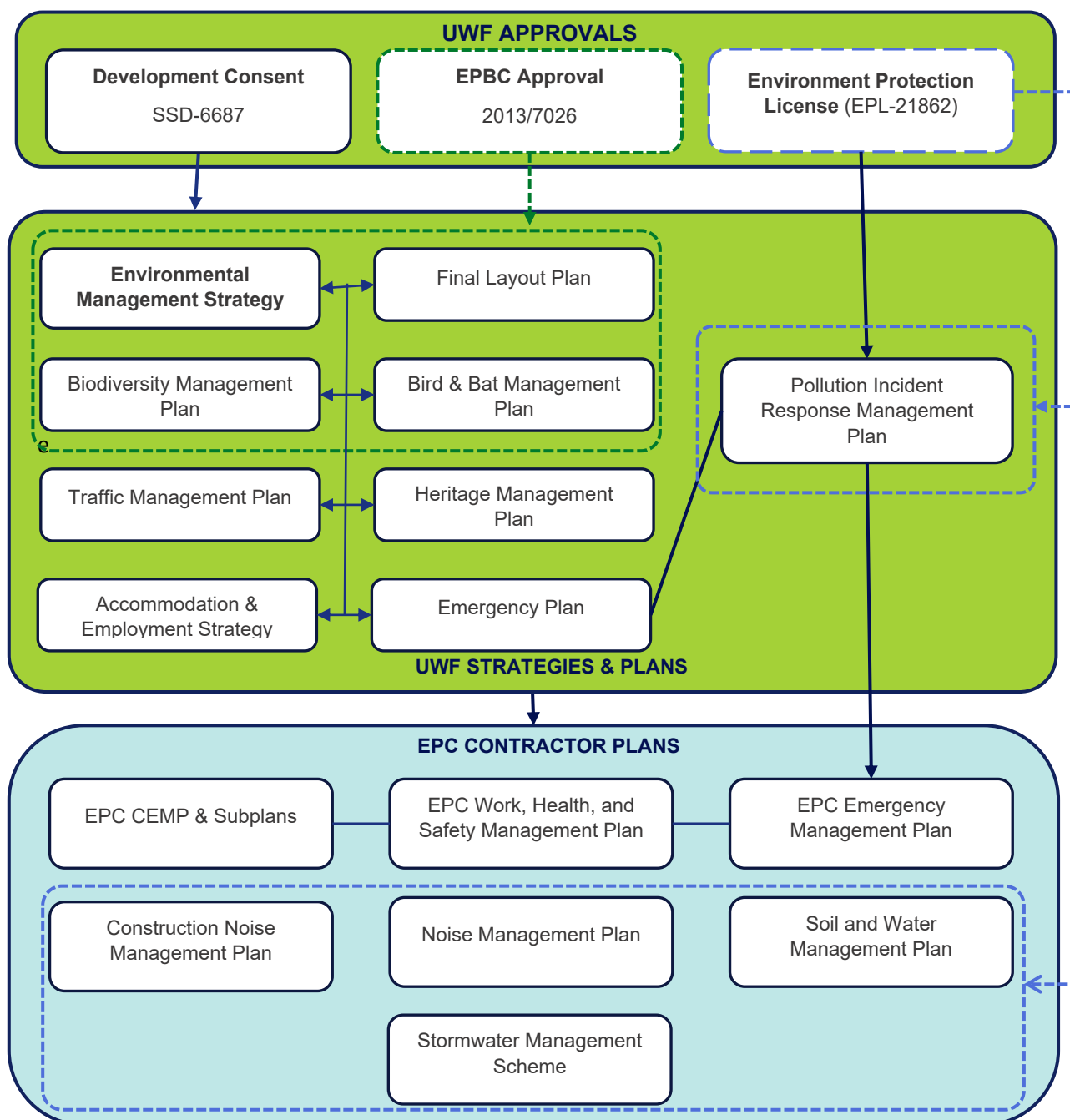


Figure 3 Relationship between UWF and EPC Contractor Management Plans

3 Statutory Approvals

3.1 Overview of Statutory Approvals

The following Statutory Approvals have been obtained for the Uungula Wind Farm project:

- Development Consent SSD-6687
- Commonwealth EPBC Approval 2013/7026
- NSW EPA Environment Protection Licence (EPL 21862)

Copies of the approvals are available on the Uungula Wind Farm website:

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

3.2 NSW Development Consent SSD-6687

The Project has obtained State Significant Development Consent (SSD-6687, Mod 2) under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). An Environmental Impact Statement was prepared as part of the Development Application process, to assess the impacts of the development. The EIS and associated documentation can be found on the NSW Major Projects website:

<https://pp.planningportal.nsw.gov.au/major-projects/projects/uungula-wind-farm> In accordance with Condition A1 of the Development Consent, all reasonable and feasible measures will 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.

The Terms of the Development Consent include:

- Condition A2 – The development may only be carried out:
 - a. in compliance with the conditions of the consent;
 - b. in accordance with all written directions of the Planning Secretary;
 - c. generally in accordance with the Environmental Impact Statement; and
 - d. generally in accordance with the Development Layout in Appendix 2 of the consent.
- Condition A3 – The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:
 - a. any strategies, plans or correspondence that are submitted in accordance with this consent
 - b. any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and
 - c. the implementation of any actions or measures contained in these documents.
- Condition A4 - The conditions of the consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

Additional conditions for Environmental Management (Development Consent Part C) are provided in Appendix B together with a description of how the Project will comply with those conditions.

All conditions of the Development Consent are incorporated into Uungula Wind Farm's internal Compliance Tracking Matrix, which will be maintained by the Environmental Advisor throughout the development.

3.3 Commonwealth EPBC Approval 2013/7026

The Project has obtained a Controlled Action Approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC 2013/7026). The EPBC Referral and related Decision Notices are available on the EPBC Public Portal at the following website:

<https://epbcpportal.awe.gov.au/all-referrals/project-referral-summary/?id=5dd96a1e-4c67-e511-b4b8-005056ba00ab>

In accordance with Condition 8 of the EPBC Approval 2013/7026, the following plans will be submitted electronically to the Minister once approved by the NSW Planning Secretary:

- Biodiversity Management Plan (BMP) (Condition B23);
- Bird and Bat Adaptive Management Plan (BBAMP) (Condition B24);
- The Environmental Management Strategy (Condition C1); and
- Final Layout Plan (Condition C8).

All conditions of the EPBC Approval are incorporated into Uungula Wind Farm's internal Compliance Tracking Matrix (refer to Section 6.5), which will be maintained by the Environmental Advisor throughout the development.

3.4 NSW EPA Environment Protection Licence (EPL 21862)

An Environment Protection Licence has been obtained for the Project (EPL 21862). The EPL 21862 lists two Scheduled Activities as defined in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act), being:

- electricity generation; >450 – 1000 GWh annual generating capacity; and
- crushing, grinding or separating; > 500000 - 2000000 T annual processing capacity.

All EPL Conditions are incorporated into the Project's internal Compliance Tracking Matrix (refer to Section 6.5), which will be maintained by the Environmental Advisor throughout the development.

3.5 Additional Approvals, Permits, and Licences

Table 3 identifies additional approvals/permits/licences that apply to the Development.

Table 3 Additional approvals, permits, and licenses

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 components to the project site.	Prior to transporting over-size over-mass 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	Dubbo Regional 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 <i>Water Management Act 2000</i>	Water extraction for construction activities e.g. cement manufacture and civil construction activities.	A WAL will be obtained, if required, prior to taking any water.	Water NSW

Approval type	Activity relating to approval	Timing	Approval Authority
Water Supply Work Approval <i>Water Management Act 2000</i>	Required to authorise the holder to construct a water supply work at a specified location (eg. to install and operate a pump or bore).	A Water Supply Work Approval would be obtained, if required, prior to installing and operating any water supply work.	Water NSW
Licence over Crown Land <i>Crown Land Management Act 2016</i>	Wind farm infrastructure and works located on Crown land, roads and waterways		Water NSW

4 Roles and Responsibility

4.1 Structure and Responsibility

Uungula Wind Farm Pty Ltd, as the Proponent, is ultimately responsible for ensuring compliance of the Project with the State and Commonwealth Environmental Approval requirements for Environmental Management throughout the lifecycle of the Project. UWF will ensure that all Employees, Contractors (and their Sub-Contractors) are made aware of, and are instructed to comply with, the conditions of the Development Consent relevant to activities carried out in respect of the Project.

The Proponent has engaged Engineering, Procurement, Construction (EPC) Contractors who are responsible for design and construction of the Project. The Proponent has provided this EMS and relevant subplans to the EPC, to prepare a Construction Environmental Management Plan (CEMP) to meet all statutory requirements as it relates to their Scope of Work and Environmental Requirements.

The EPC's CEMP will include roles and responsibilities, reporting procedures, authorisations for managing environmental incidents, non-compliance, environmental management and mitigation, risk assessment, inspections and audits of the Project during the design and construction phases. These obligations are detailed in the contract between the relevant parties.

The EPC's CEMP will be prepared prior to the commencement of construction and reviewed by the Proponent. The EPC's CEMP will be iteratively updated by the EPC to reflect the stage of construction and associated environmental risks and reviewed by the Proponent to ensure consistency with this EMS and subplans.

During operation, the Proponent will enter into a separate contract for the operational management of the Project. This EMS will be revised to reflect the operational status of the Project, and provided to the Operational Contractor. The Operational Contractor will be responsible for preparing an Operational Environmental Management Plan (OEMP) to meet all statutory requirements as it relates to their Scope of 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 provided in Section 6. The Contractors must retain and provide records to support Project compliance and environmental obligations to the Proponent. Incidents and non-conformances must be reported to the Proponent as defined in the Contract and described in Section 7 of this EMS.

Table 4 summarises the roles and responsibilities of the Key Personnel for the Project.

Table 4 Key roles and responsibilities

Role	Responsibility
Proponent's Project Manager	• Implementation of Squadron Energy Environmental Policy; • Approval and management of EPC Contractor; • Delivery of the Project in accordance with this EMS, associated plans and statements and State and Commonwealth conditions of approval; • Review and approve Project design changes, and update Project Environmental Officer and Project Community Officer; • Provide adequate resources to allow the implementation of the Project EMS; • Issue non-conformance notices and to issue actions to avoid or minimise potential environmental impacts, and failing the effectiveness of such steps, order cessation of a specific activity; • Ensure all personnel attend a Project Environmental site induction prior to commencing work; and • Hold regular Project team meetings.

Role	Responsibility
Proponent's Environmental Advisor	• Ensure site specific environmental requirements are fulfilled and be the primary point of contact for community liaison for environmental matters; • Ensure sub-contractors and agents comply with the EMS, management plans and programs; • Undertake environmental surveillance, auditing and reporting; • Primary point of contact for regulatory agency liaison; • Oversee environmental monitoring; • Report to the Proponent's Project Manager on environmental performance of the EPC and sub-contractors;
Proponents Community Relations Advisor	• Ensure the community is well informed of activities at the Project site, 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.
Proponent's Independent Environmental Auditor	• 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 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: – 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
EPC Project Manager	• Overall responsibility for all contractors and subcontractors involved in the Project; • Develop the Risk Management Plan for construction, and maintaining that plan throughout construction; • Consult with Proponent's Project Manager in relation to all Project design plan changes; • Ensure adequate resources are available for all contractors and subcontractors to deliver the Project in compliance with the EMS and other relevant documents; • Ensure all contractors and subcontractors are inducted prior to commencing work; • Hold regular Project team meetings and toolbox talks, ensuring information is shared between all site personnel; and • Support and attend Community Consultative Committee (CCC) meetings at the request of the Proponent's Project Manager.

Role	Responsibility
EPC Environmental Advisor	• Obtain the relevant licences and approvals for construction including any quarry licences and commercial water licences; • Implementation, monitoring and performance against CEMP commitments (as consistent with the Development Consent and associated management plans); • Manage environmental incidents in accordance with Section 8; • keep environmental related registers including compliance, waste tracking, complaints, training, incidents and non-conformance accurate and up to date; • Undertake regular (at least weekly) environmental inspection and provide advice to ensure compliance with relevant approvals and associated management plans under the Development Consent; • Prepare reports (at least fortnightly) on compliance to the satisfaction of the Project Environmental Officer; • Prepare environmental induction training materials in accordance with the EMS and associated plans; and • Delivery of the management plans and programs identified in Section 2.3, and the additional responsibilities identified in the Biodiversity Management Plan and heritage related controls (e.g. Chance Finds Protocol).
All Employees and Contractors	• Complete a site induction which includes environmental aspects prior to commencing works on site; • Attend all environmental training as required; • Comply with the environmental controls in this EMS and all associated plans, sub 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 the Development Consent conditions; and • Follow instructions of the Project Environmental Officer.

5 Communication Procedures

5.1 Community Consultative Committee

A Community Consultative Committee (CCC) has been established for the Project in accordance with Condition A20 of the Development Consent. The CCC operates in accordance with the *Community Consultative Committee Guidelines for State Significant Projects (2016)* or its latest version.

The frequency of CCC meetings is determined by the committee members and considers the Project stage and level of public interest. Subsequently, meeting frequency may vary with the different stages of the Project construction, operation, and decommissioning. The CCC meetings are generally held on a quarterly basis during construction and will be held on a 6-monthly basis during operations. Scheduling of subsequent CCC meetings is determined at each meeting and recorded in the minutes.

Any committee member can request the independent chairperson to convene a CCC for important or urgent matters requiring consideration. The independent chairperson will determine if a meeting is warranted or if the matter can be addressed in an alternative manner.

A minimum four weeks' notice is required to convene a regular meeting. A minimum two weeks' notice is required to convene an extraordinary meeting.

The Independent Chairperson for the UWF CCC is Garry West: garrybwest@bigpond.com

Minutes from the CCC meetings are published on the Project website <https://www.squadronenergy.com/our-projects/uungula-wind-farm>

5.2 Information Sharing

The Proponent will share information to the relevant Agencies in accordance with the State and Commonwealth Approval conditions described in Sections 7 and 8, and notification procedures described in the relevant management plans listed in Section 2.3 of this EMS.

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

5.2.1 Project Website

The Project has a dedicated website. The website is regularly updated and maintained for the life of the Project providing key updates and information to the community, and relevant information required by Condition C16 of the Development Consent, including:

- Information about the Development, including a Final Layout Plan;
- Project contact details (phone, email, postal address);
- Current Development status and projected timeline;
- The Environmental Impact Statement;
- Statutory Approvals and documentation;
- Approved plans, strategies and Programs required under the conditions of the Development Consent;
- EPBC Annual Compliance Report in accordance with the EPBC Approval;
- Monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the Development Consent including:
 - Bird and Bat monitoring and related reports;
 - Operational noise monitoring and related reports;
- Proposed staging plans/approvals for the Project;

- Complaints register, to be updated on a monthly basis;
 - The minutes of CCC meetings;
 - Annual Statement of Compliance with the EPL 21862;
 - Any independent environmental audit, and the Proponent's response to the recommendations; and
- Any other matter required by the Planning Secretary.

5.2.2 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 a newsletter to registered parties informing of Project updates via email (registration is open to all stakeholders through the Project website);
- Regular and ongoing community consultative committee (CCC) meetings;
- Publishing CCC meeting minutes on the Developments website;
- Maintaining a complaint register and publishing monthly on the Developments website;
- Reporting incidents and non-conformances to relevant government agencies;
- Publishing annual environmental performance reports and providing to relevant government agencies (i.e. EPL Annual Return, NSW independent audit and Commonwealth annual compliance report);
- Establishing a dedicated telephone line and email address for enquiries;
- Local media (including social) advertisements;
- Phone, letterbox drops, face to face interactions; and
- Community open and information events.

5.3 Complaints

5.3.1 Receiving Complaints

Community concerns, enquiries and complaints regarding the Project can be received via the following avenues:

- Project email address: info@uungulawindfarm.com.au
- Phone, via the complaints and issues contact point: [0488 820 191](tel:0488820191)
- Post: [PO Box 1708, Newcastle, NSW 2300](#)
- Project offices (Dubbo or Wellington)
- The CCC; and
- Face to face.

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

5.3.2 Complaint Management

Complaints received in relation to the Project will be managed in accordance with the SQE Community Complaints Management Process (SQE-08-PRC-011), which sets out the procedures for the receipt, assessment, investigation, response, escalation and close-out of complaints, including record keeping and

reporting requirements. This process ensures complaints are addressed in a timely, transparent and consistent manner and in accordance with the requirements of the Development Consent. The Community Complaints Management Process is publicly available on the Squadron Energy website, <https://squadronenergy.com/about/key-documents>

Complaints will be reviewed by the Project Manager, and if relevant, by the construction contractor before being allocated to the appropriate personnel, responded to and corrective or preventative action initiated. Complaints linked to Approval Conditions will be escalated to subject matter experts who will assess further action and reporting obligations. Target response time for addressing complaints from receipt are included in Table 5.

Table 5 Complaint target response time

Complaint classification	Summary	Timing
Phone call or personal contact	During standard construction hours and during out of construction hours (when constructing work is occurring)	Verbal response immediately (if possible) to determine the nature of the complaint and acknowledgement of complaint within 24 hours.
	Out of standard construction hours (when no construction is occurring)	Verbal response within 48 hours.
Written complaint (email, text, or letter)	Any written complaint from the community or a stakeholder	Written response as soon as possible but within ten working days unless otherwise agreed with SQE and the stakeholder.

All complaints are recorded by the Project, and will include:

- Date and time of the complaint;
- Communication Method (i.e. telephone, mail, meeting, email etc.);
- Name, address, contact telephone number of complainant/enquirer (if no such details were provided, a note to that effect);
- Nature of the complaint and issues raised;
- Record of operational and meteorological conditions contributing to the comment or complaint;
- The number of people affected in relation to the complaint;
- Actions taken in response including follow up contact;
- Details of whether resolution was reached;
- Any monitoring to confirm that the complaint was satisfactorily resolved.

The Complaints Register summarises the above information. It is updated and uploaded to the Project website monthly, with individual information excluded for privacy purposes.

5.4 Dispute Resolution

The Project aims to build and maintain strong relationships with all internal and external stakeholders so that no disputes eventuate. All efforts will be made to resolve a dispute internally with the affected party.

In the event a complaint cannot be resolved, and a dispute has arisen:

- An investigation will be initiated by the Proponent's Project Manager, in consultation with the Proponent's Community Relations Advisor,, Legal Counsel, relevant technical/subject matter expert and relevant parties as required, to clarify the dispute and identify actions taken to date.

- An investigation will be undertaken to assess the nature of the dispute and possible resolution with the aim of reaching a mutual agreement between affected parties.
- If necessary, an appropriately qualified and experienced independent person or third party, (eg. 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 after 12 months of registering the original complaint, either party may refer the dispute to the Planning Secretary for resolution in accordance with the Development Consent. This includes disputes relating to:
 - Visual impact mitigation measures (Condition B2);
 - Road upgrades to be implemented (Condition B30);
 - Scope and implementation of road maintenance and remedial works (Condition B31);
 - Aviation hazard lighting (Condition B4); and
 - Mitigation measures implemented in response to disruptions to radio communications (Condition B37).

6 Environmental Monitoring and Compliance Management

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 include:

- Environmental inspections (see Section 6.1);
- Environmental audits (see Section 6.2); and
- Specific monitoring and measurement of a particular environmental aspect as required under the Development Consent (E.g. operational noise monitoring).

6.1 Environmental Inspections

Environmental inspections will be conducted by the Proponent and the EPC Contractor to evaluate the effectiveness of environmental controls and general compliance with the EMS, associated strategies, plans and programs.

The EPC Contractor must undertake regular (at least weekly) environmental inspections of all work areas using an environmental inspection checklist. The checklist is to be developed and included in the EPC Contractor CEMP. The checklist will include a range of environmental inspection criteria to document compliance with, and effectiveness of, the various mitigation measures and controls specified within this EMS, management plans and strategies and programs required by all Project Approvals.

A report must be provided to the Proponent at least fortnightly documenting environmental compliance.

The Proponent's Environmental Advisor will undertake environmental inspections (monthly, or more frequently as required) to monitor compliance with the Project Approvals and adherence to the Strategies, Plans and Programs.

6.2 Environmental Audits

6.2.1 Independent Environmental Audits requirements of Development Consent SSD-6687

In accordance with Condition C15 of the Development Consent independent audits of the Project will be conducted and carried out at the frequency described and in accordance with the *Independent Audit Post Approval Requirements (2020)*, unless otherwise agreed or directed by the NSW Planning Secretary (the Secretary).

During the construction phase, Independent Environmental Audits will be conducted:

- Within 12 weeks of the commencement of construction
- Within 26 weeks of the initial Independent Audit, or as otherwise agreed by the Secretary.
- Every 26 weeks thereafter, unless otherwise agreed by the Secretary.

During Operational phase, Independent Environmental Audits will be conducted at intervals no greater than 3 years, or as otherwise agreed by the Secretary. The Proponent will submit electronic copies of the Independent Audit Reports and any response to the audits to DPHI via the Major Projects Portal no later than 2 months after undertaking the independent audit site inspection. Independent Audit reports will be published on the UWF Project website in accordance with Condition 16 of the Development Consent.

6.2.2 Independent Audits Requirements of EPBC Approval 2013/7026

In accordance with Condition 12 of the EPBC Approval, UWF will ensure that independent audits of compliance with the EPBC Approval conditions are conducted as requested in writing by the Minister.

In accordance with Condition 13, for each Independent Audit requested by the Minister, UWF will:

- a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department.
- b. submit an audit report to the Department within the timeframe specified in the approved audit criteria.

6.2.3 Internal Project Audits

UWF will undertake internal audits to verify compliance with the Developments statutory approvals, this EMS, and the associated Strategies, Plans and Programs. The undertaking of the audits will be in accordance with a risk-based audit schedule, which will be developed by the UWF Project Manager and Environmental Advisor. Internal audits will be conducted on a quarterly basis during the construction phase. The audit schedule will identify the scope of the audit, timing of the audit, and the person(s) who will conduct the audit.

The internal project audits will be coordinated by the Project Environmental Advisor together with the Project Manager.

Any identified non-compliances with the Development Consent will be managed in accordance with Section 6.4.

6.3 Environmental Monitoring

A monitoring plan for the development is provided in Table 6. Table 6 sets out all monitoring to be carried out in relation to the Project, including the method, timing, responsibility, and monitoring outputs (i.e. records/reporting type).

Note, Table 6 does not provide comprehensive details of all monitoring required for the development. 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 and the EPL 21862. In these instances, a reference to the relevant strategy / plan / program is provided where the full monitoring details can be found.

Table 6 Summary of the monitoring obligations

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	EMS Table 5 Contractors CEMP	Audible construction noise will be monitored throughout the construction of the development.	Daily during construction activities.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to construction noise minimisation through inspections and audits.	Environmental inspection checklists by the EPC contractor.
	EPL 21862 Condition R4.3	Construction Noise Management Plan (CNMP)	Noise generated by any construction activities will be managed in accordance with the requirements outlined in the Interim Construction Noise Guideline (DECC, 2009) Construction workers will only operate plant and equipment that are in good working order, within permitted operating hours and in accordance with the technical specifications of the equipment and plant.	During weekly environmental inspections.		Internal audit reports by the Proponent, confirming that reasonable steps are being taken to minimise construction noise emissions.
Blast overpressure monitoring	SSD Condition B11 EPL 21862 Condition L4	EMS Table 5 Contractors CEMP	Monitoring of blast overpressure to ensure that blasting does not exceed the noise criteria set out in Condition B11 of the Development Consent, in addition to Condition L4 of the EPL 21862 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.	EPC Contractor.	Blast monitoring report will be prepared by the EPC Contractor (or their appointed consultant).
Operational noise monitoring	SSD Condition B14 EPL 21862 Condition L3 and R4.2	EMS Table 5 Noise Management Plan (NMP)	Operational noise monitoring will be undertaken to determine whether the development is complying with the relevant conditions of the Development Consent and the EPL 21862. Noise generated by the operation of ancillary infrastructure will be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (2017) (or its equivalent).	The NMP prepared and implemented prior to commissioning of turbines Monitoring to be completed within 6 months of commencing Operation of the wind farm.	EPC Contractor , in consultation with the Proponent.	Noise compliance monitoring report will be prepared by the EPC Contractor (or their appointed consultant). UWF will submit the report to the NSW DPHI and NSW EPA.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Further operational noise monitoring	SSD Condition B15	EMS Table 5	The Applicant must undertake further operational noise monitoring of the development if required by the Planning Secretary. A report will be prepared summarising the outcomes of the monitoring.	In accordance with the requirement of the Planning Secretary.	EPC Contractor , in consultation with the Proponent.	UWF will submit a copy of the monitoring results to the DPHI and the NSW EPA, as required.
Air quality monitoring	SSD Condition B16 EPL 21862 Condition O3	EMS Table 5 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.	EPC 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 6.2), confirming that reasonable steps are being taken to minimise construction noise emissions.
Erosion and sedimentation monitoring	SSD Condition B19	EMS Table 5 Contractors CEMP Contractors Erosion and Sediment Control Plan	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.	EPC 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 6.2), documenting that erosion and sediment controls are performing effectively.

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Biodiversity: Monitoring compliance with the impact minimisation measures in the Biodiversity Management Plan	SSD Condition B23	UWF Biodiversity Management Plan Contractors CEMP	Monitoring the implementation and effectiveness of the biodiversity management measures within the BMP (refer to Section 3 of the BMP). Requires monitoring of: • Clearing of native vegetation, including progressive tracking of clearing and disturbance area impacts. • 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.	Monitoring required daily during clearing activities. Also, during weekly environmental inspections. Vegetation clearing and disturbance register to be updated at least fortnightly.	EPC Contractor. The Proponent may also conduct monitoring through inspections and audits.	Environmental inspection checklists. Vegetation clearing and disturbance register. Internal audit reports (see Section 6.2).
Bird and bat impact monitoring	SSD Condition B24	UWF 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 B26	UWF Heritage Management Plan Contractors CEMP	Monitoring the implementation and effectiveness of the Heritage management measures within the HMP (refer to Section 3 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.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to heritage through inspections and audits.	As set out in the UWF HMP. Environmental inspection checklists. Internal audit reports (see Section 6.2).
OSOM Transport monitoring	SSD Condition B27	UWF Traffic Management Plan	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 8 of the Development Consent and as described in the Approved TMP (refer to Section 3 and Section 6.14 of the TMP).	Ongoing daily monitoring for the duration of OSOM deliveries. During weekly environmental inspections.	EPC 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 6.2).
Project vehicle monitoring	SSD Condition B28	UWF Traffic Management Plan	Monitoring to ensure that all heavy and light vehicles associated with the development are travelling to and from the site via Twelve Mile Road (west) and the approved site access point on Twelve Mile Road (unless the Secretary agrees otherwise).(refer to Section 3 and 6.16.2 of the TMP)	Ongoing daily monitoring for the duration of the development. During weekly environmental inspections.	EPC 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 6.2).
Traffic monitoring	SSD Condition B33	UWF Traffic Management Plan Contractors CEMP	Monitoring of the effectiveness of the measures within the TMP (refer to Sections 6.2.3 and 6.16.4 of the TMP).	During weekly environmental inspections.	EPC 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 6.2).

Type of monitoring	Condition reference	Management plan reference	Monitoring requirement and method	Timing / frequency	Responsibility	Reporting output and submission requirements
Monitoring Asset Protection Zones	SSD Condition B41	UWF 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.	EPC Contractor. The Proponent may also conduct environmental monitoring in relation to proper maintenance of APZs.	Environmental inspection checklists. Internal audit reports (see Section 6.2).
Monitoring for bushfire danger	SSD Condition B42	UWF Emergency Plan Contractors CEMP	RFS websites will be monitored to determine Total Fire Ban days and Fire Danger Ratings relevant to the Project site.	Daily during works.	EPC Contractor.	Daily pre-start meeting materials.
Waste management monitoring	SSD Condition B44 EPL 21862 Condition L2.1	EMS Table 5 Contractors CEMP	Visual monitoring to ensure that waste is being classified, stored, handled, transported and disposed in accordance with the requirements of the Development Consent, EPL 21862 and requirements of the NSW EPA's <i>Waste Classification Guidelines</i> .	Daily during construction. During weekly environmental inspections.	EPC 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 B45	UWF 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. Bi-annually throughout the life of the operational development.	EPC Contractor. The Proponent will monitor throughout the life of the development.	Monthly EPC reports. Internal audit reports (see Section 6.2).
Monitoring of area exposed at any one time	SSD Condition B47	EMS Table 5 Contractors CEMP	Visual monitoring of the works to ensure that the total area exposed at any time is being minimised as far as practicable.	Weekly during construction During weekly environmental inspections.	EPC 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 6.2), 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 B47	UWF 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.	EPC 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 6.2), documenting that rehabilitation is meeting the objectives of the BMP and the Rehabilitation Management Program.
Independent Environmental Audits	SSD Condition C15	EMS Section 6.2	Independent Environmental Audit in accordance with Section 6.2 and the Departments Independent Audit Post Approval Requirements (May 2020).	Within 12 weeks of commencing construction, then at least every 26 weeks thereafter (refer Section 6.2)	The Proponent	Electronic copy of Independent Audit Reports to be submitted to the DPHI via Major Project portal, within 2 months of conducting the audit site inspection. Copies of Independent Audit reports will be placed on the Project website.
Internal Project Environment Audits	SSD Condition C1	EMS Section 6.2	Internal audit conducted in accordance with UWF audit schedule (to be developed).	Quarterly during construction (refer Section 6.2)	The Proponent	Internal Audit report – to be provided to the Project Manager.
Weather monitoring	EPL 21862 Condition M2	EMS Table 5	Monitor the parameter, and the requirements specified in the table in condition M2 of the EPL 21862. Sampling methods are defined in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC 2007).	Continuously via site weather station	EPC Contractor. Proponent may also conduct environmental monitoring in relation to weather monitoring through inspections and audits.	Monthly EPC reports.

6.4 Response to Non-compliance

6.4.1 What is a Non-compliance?

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.

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 (the approved BMP, approved BBAMP, approved EMS or Final Layout Plan).

6.4.2 Non-compliance Identification and Investigation

Non-compliance 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 UWF Project Manager and Project Environmental Advisor.
2. The UWF Project Manager and Project Environmental Advisor (or delegate) will ensure that the non-compliance is investigated by the responsible party (the party responsible for the non-compliance) 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 UWF, and may include:
 - Amendment of the EMS or relevant strategy, plan, program, or procedure;
 - Additional control measures;
 - Staff training;
 - Disciplinary actions.
4. The responsible party will prepare and submit a report to UWF documenting the above information.

6.4.3 Notification of Non-compliance to NSW Planning Secretary (DPHI)

In accordance with Condition C11 of the Development Consent, UWF will provide written notification to the Planning Secretary via the Major Project website within seven calendar days of becoming aware of a non-compliance with the Development Consent. The written notification will identify the Development and the application number (Uungula Wind Farm; SSD-6687), the condition of Consent that the development is non-compliant with, the way in which it 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 also be notified as a non-compliance.

6.4.4 Notification of Non-Compliance to Commonwealth Department (Cth DCCEE)

In accordance with Condition 10 of the EPBC Approval, UWF will provide a written notification to the Department of any non-compliance with the conditions of the EPBC Approval, or the commitments made in the associated approved plans (EMS, BMP and BBAMP), or the Final Layout Plan.

The notification will be given to the Department as soon as practicable, and no later than two business days after becoming aware of the non-compliance, and will provide the following information:

- a. Any condition which is in breach,

- b. A short description of the non-compliance, and
- c. The location (including coordinates), date, and time of the non-compliance. In the event the exact information cannot be provided, the notification will provide the best information available.

In accordance with Condition 11 of the EPBC Approval, UWF will provide further written details to the Department of the non-compliance. The further written details will be provided no later than 10 business days after becoming aware of the non-compliance specifying:

- a. Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future,
- b. The potential impacts of the incident or non-compliance, and
- c. The method and timing of any remedial action that will be undertaken by the approval holder.

6.5 Compliance Tracking Matrix

A Compliance Tracking Matrix is an internal document that has been developed as a tool to track compliance with the various Project Statutory Approvals. The Environmental Advisor will maintain the Compliance Tracking Matrix throughout the development.

The Compliance Tracking Matrix will undergo routine review and update by the Environmental Advisor, to reflect the compliance status of the Project. The Matrix will be updated as required, in response to the outcomes of environmental monitoring (refer to Section 6.1 – 6.3), non-compliance identification (Section 6.4) or on satisfying the compliance obligations under the conditions of project Statutory Approvals / additional approvals and licences.

7 Environmental Reporting and Notification

7.1 Summary of Reporting and Notification Obligations

A summary of the reporting and notification obligations from the Development Consent, the Commonwealth EPBC Approval and the EPL 21862 is provided in Table 7.

If there are any modifications or variations to Project Approvals or licences, Table 6 will be updated to incorporate the relevant reporting and notification obligations.

Table 7 Reporting and notification obligations

Condition	Report / notification description	Timing	Report / notify to
Development Consent (SSD-6687)			
B35	The Applicant must provide the following information to CASA, Airservices Australia, and the RAAF (together the authorities): a. co-ordinates in latitude and longitude of each wind turbine and mast; b. the final height of each wind turbine and mast in Australian Height Datum; c. ground level at the base of each wind turbine and mast in Australian Height Datum; d. confirmation of compliance with any OLS; and e. 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.
B36	The Applicant must: a. provide confirmation to the authorities that the information that was previously provided remains accurate; or b. update the information previously provided.	Within 30 days of the practical completion of any wind turbine or mast.	Civil Aviation Safety Authority (CASA), Airservices Australia and the RAAF.
B41 (e)	Notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.	Following construction and prior to commencing operations.	Wellington Local Emergency Management Committee.
C7	The Applicant must notify the Department of the date of commencement, or cessation, of construction, operations, upgrading or decommissioning phases.	Prior to commencing the construction, operations, upgrading or decommissioning phases. <i>Note: construction commencement notification was submitted to the Department in March 2025.</i>	DPHI, via Major Projects website portal.
C7	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.	Prior to commencing construction of the Wind Farm (Stage 1) and Battery Storage Facility (Stage 2).	DPHI, via Major Projects website portal.

Condition	Report / notification description	Timing	Report / notify to
C8	The Applicant must submit detailed plans of the final layout of the development, which include: 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. <i>Note: the Final Layout Plan was submitted to the Department in November 2023.</i>	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.	Planning Secretary, via Major Projects website portal.
C10	Notification & reporting of incidents – as described in Sections 8.1 & 8.2 of this EMS.	Immediately after the Applicant becomes aware of the incident	DPHI, via Major Projects website portal.
C11	Notification and reporting of non-compliances – as described in Section 6.4 of this EMS.	Within seven (7) days after the Applicant becomes aware of the non-compliance.	DPHI, via Major Projects website portal.
C14	The Applicant must notify the owners of: b. any non-associated residence within 5 km of any approved wind turbine of their rights under condition B2 of Schedule 2.	Prior to commencing construction. <i>Note: the notifications were provided to owners of non-associated residences in March 2025.</i>	The relevant landowners, per the condition.
C15	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.

Condition	Report / notification description	Timing	Report / notify to
EPBC Approval 2013/7026			
Condition 9	The approval holder must prepare a compliance report addressing compliance with each of the conditions of this approval, including implementation of any management plans and strategies from the State development consent that are referred to in this approval, every calendar year on the anniversary of the date of this approval, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: - publish each compliance report on a website within 3 months following the relevant 12-month period - notify the Department by email that a compliance report has been published on the website and provide the website's link for the compliance report within five business days of the date of publication - keep all compliance reports publicly available on the website until this approval expires	By the 3 November each year (within 3 months of the anniversary date of the approval). Anniversary Date = 3 August.	Publish the compliance report on the Project website: https://www.squadronenergy.com/our-projects/uungula-wind-farm Notify Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 10	Notification and reporting of any non-compliance relating to the EPBC Approval, as set out in Section 6.4 of this EMS. Notification and reporting of any incident relating to the EPBC Approval, as set out in Section 8.2 of this EMS.	No later than two business days after becoming aware of the incident or non-compliance.	Notify and report to Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 11	Further details of any non-compliance relating to the EPBC Approval, as set out in Section 6.4 of this EMS. Further details of any incident relating to the EPBC Approval, as set out in Section 8.2 of this EMS.	No later than 10 business days after becoming aware of the incident or non-compliance.	Report to Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 13	For each independent audit conducted under Condition 12 of the EPBC Approval, submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Within the timeframe specified in the approved audit criteria.	Report to Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 14	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.	Within 10 business days of receiving the Department's approval of the audit report.	Publish the report on the Project website: https://www.squadronenergy.com/our-projects/uungula-wind-farm

Condition	Report / notification description	Timing	Report / notify to
Condition 15	After the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Within 30 calendar days after the completion of the action.	Notify and report to Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 16	The approval holder must notify the Department in writing of any proposed change to the State development consent that may relate to protected matters.	Within 5 business days of formally proposing a change or within 5 business days becoming aware of any proposed change.	Notify Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
Condition 17	The approval holder must notify the Department in writing of any change to the State development consent conditions that may relate to protected matters.	Within 10 business days of a change to conditions being finalised.	Notify Cth DCCEEW, via email: epbcmonitoring@environment.gov.au
EPL 21862			
L5.2	On becoming aware of the need to undertake emergency work as per condition L5.2, the proponent must notify the EPA.	On becoming aware of Emergency Works.	Telephoning the Environment Line service 131 555
M4.2	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	The licensee must complete and supply to the NSW EPA an Annual Return for the EPL 21862.	No later than 60 days after the end of each reporting period. (Due 27 th July)	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 the NSW EPA of incidents causing or threatening material harm to the environment immediately, as set out in Section 8.3 of this EMS.	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 NSW 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.	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.	Notify the NSW EPA via eConnect EPA

8 Incident and Emergency Response

The SQE Incident Response and Investigation Procedure defines the system for reporting, recording, classification, and investigating work-related incidents and near misses that involve workers performing work across SQE sites and operations, including those that are non-notifiable.

8.1 Response to an Incident Under the Development Consent (SSD-6687)

In accordance with the 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:

- a) involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or*
- b) results in actual or potential 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 on-site key personnel must report a potential incident to the EPC Project Manager and Proponent Project Manager. The Proponent Project Manager in consultation with the Project Environmental Advisor (and the EPC Environmental Advisor, as required) will determine if the incident has caused or threatens to cause material harm.

If the Applicant becomes aware of an incident pursuant to the Development Consent, the Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) will notify the Department of the incident in writing via the Major Projects portal immediately in accordance with Condition C10. The immediate notification will identify the development (SSD-6687; Ungula Wind Farm), and set out the location and nature of the incident.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) will subsequently provide a written notification to the Planning Secretary within 7 calendar days after the Applicant becomes aware of an Incident via the Major Projects portal and will:

- a. identify the development and application number (Ungula Wind Farm; SSD-6687);
- b. provide details of the Incident (date, time, location, a brief description of what occurred and why it is classified as an Incident);
- c. identify how the incident was detected;
- d. identify when the applicant became aware of the Incident;
- e. identify any actual or potential Non-compliance with conditions of consent;
- f. describe what immediate steps were taken in relation to the Incident;
- g. identify further action(s) that will be taken in relation to the Incident; and
- h. identify a project contact for further communication regarding the Incident

Within 30 calendar days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.

The Incident Report must include:

- a summary of the incident;

- outcomes of an Incident investigation, including identification of the cause of the incident;
- details of the corrective and preventative actions that have been, or will be, implemented to address the Incident and prevent recurrence; and
- details of any communication with other stakeholders regarding the incident.

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

8.2 Response to an Incident Under EPBC Approval (2013/7026)

In accordance with the EPBC Approval 2013/7026, an Incident is defined as:

Any event which has the potential to, or does, impact on one or more protected matter(s) other than as authorised by this approval.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must notify the Department in writing of any incident pursuant to the EPBC Approval. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident.

The notification must specify:

- Any condition which is in breach,
- A short description of the incident, and
- The location (including co-ordinates), date, and time of the incident. In the event the exact information cannot be provided, provide the best information available.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must provide to the Department the details of any incident as soon as practicable and no later than 10 business days after becoming aware of the incident, specifying:

- Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future,
- The potential impacts of the incident or non-compliance, and
- The method and timing of any remedial action that will be undertaken by the approval holder.

8.3 Response to an Incident Under EPL 21862

In accordance with the EPL 21862, condition R2 requires 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 POEO Act.

Part 5.7 of the POEO Act defines 'Material Harm' as harm that:

(a) Harm to the environment is material if

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- It results in actual or potential loss of property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations), and*

(b) 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.

The Project's Environmental Advisor (or other key personnel nominated by the Proponent's Project Manager) must notify the NSW EPA immediately, by telephoning the Environment Line service on 131 555.

The licensee must provide written details of the notification to the NSW EPA within 7 days of the date on which they became aware of the incident.

Management and response to 'Pollution Incidents' is addressed in the WF Pollution Incident Response Management Plan (PIRMP).

8.4 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 site emergency response plans in accordance with 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 EPC Contractor Emergency Plan;
- For fire and bushfire emergencies, implement the Emergency Plan (Fire and Bushfire) prepared under Condition B42; and
- For pollution incident emergencies, implement the PIRMP.

External agencies and support will be requested in accordance with the decision hierarchy provided in the EPC Contractor's Emergency Response Plan. The Proponent's Project Manager will be notified of the emergency as soon as practicable.

Table 8 Table of Emergency Plans relevant to the Project

Plan title	Details of Plan	Application of plan
Emergency Plan (Fire and Bushfire) – Condition B42	In accordance with Condition B42 of the Development Consent, 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: • 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 site.
Pollution Incident Response Management Plan	A Pollution Incident Response Management Plan (PIRMP) has been developed for UWF in accordance with the requirements of the POEO Act and the PIRMP Guideline (NSW EPA, 2022) and is subject to the Environment Protection Licence EPL-21862. The PIRMP includes detailed information including, but not limited to: • Communicating with regulatory and emergency response agencies • Description and likelihood of hazards • Pre-emptive actions to be taken • Inventory of pollutants • Safety equipment	The PIRMP will be implemented in the event of a pollution incident occurring on the Project Site. A hard copy of the PIRMP is available on the site at all times.

Plan title	Details of Plan	Application of plan
	• 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. The PIRMP is reviewed annually.	
EPC Contractor Emergency Response Plan	It is a legal requirement that the EPC Contractor develop a comprehensive Emergency Response Plan specific to the Project Site and EPC Contractor activities. This Plan was developed prior to the commencement of construction to meet the requirements of relevant Work, Health, and Safety Regulations. The Emergency Response Plan includes information on Emergency Response including, but not limited to: • 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. The EPC Emergency Response Plan complements the existing Emergency Plan developed in accordance with Condition B42 of the Development Consent (fire and bushfire emergencies), and the PIRMP developed by the Proponent prior to commencing construction.	The EPC Contractor Emergency Response Plan will be implemented in the event of any emergency scenario on the Project Site under the control of the EPC Contractor.

9 EMS Review

In accordance with Condition C2(a) of the Development Consent, the EMS (and any other relevant plans and programs) will be updated to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site.

In accordance with Condition C2(b) of the Development Consent, 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 of Schedule 2;
- Submission of an audit report under Condition C15 of Schedule 2; or
- Any modification to the conditions of the Development Consent.

When the EMS is updated, it will be submitted to the Planning Secretary for approval in accordance with Condition C3 of the Development Consent. In accordance with Condition C5 of the Development Consent, if the updated strategy is approved by the Planning Secretary, the updated EMS will be implemented and will supersede the previous version of the EMS.

10 References

- Fairfull, S. & Witheridge, G. (2003). Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings. NSW Department of Primary Industries.
- International Standards Organisation (ISO) (2015) ISO 14001:2015 Environmental Management accessed at: <http://www.iso.org/iso/iso14000>.
- Landcom. (2004). Managing Urban Stormwater: Soils and Construction (Blue Book). New South Wales Government.
- NSW Department of Environment & Climate Change (DECC). (2008a). Managing Urban Stormwater: Soils and Construction Volume 2A Installation of Services. Retrieved from: <http://www.environment.nsw.gov.au/resources/stormwater/0801soilsconststorm2a.pdf>.
- NSW Department of Environment & Climate Change (DECC). (2008b). Managing Urban Stormwater: Soils and Construction Volume 2C Unsealed Roads. Retrieved from: <http://www.environment.nsw.gov.au/resources/stormwater/0802soilsconststorm2c.pdf>.
- NSW Department of Environment & Climate Change (DECC). (2009). Interim Construction Noise Guideline. Department of Environment & Climate Change, Sydney.
- NSW Department of Land and Water Conservation (NSW DLWC). (1994). Guidelines for planning, construction and maintenance of tracks. NSW Department of Land and Water Conservation, Maitland, NSW.
- NSW Department of Planning & Environment (2015). Post-approval requirements for State significant developments Independent Audit Guidelines.
- NSW Department of Primary Industries (NSW DPI). (2004). Policy and Guidelines for Fish Friendly Waterway Crossings. NSW Department of Primary Industries, Sydney.
- NSW Department of Planning, Industry and Environment (DPIE) (May 2020). Requirement 2, Independent Audit Post Approval Requirements. Retrieved from: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>.
- State of New South Wales and the NSW Environment Protection Authority (2022). Guideline: Pollution Incident Response Management Plans. Retrieved from: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.epa.nsw.gov.au/sites/default/files/22p3985-pollution-incident-response-management-plans-guideline.pdf>

Appendix A Additional compliance requirements

Condition	Condition wording	Commitment to Compliance
REVISION OF STRATEGIES, PLANS AND PROGRAMS		
Condition C2	The Applicant must: - update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and - review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 3 month of the: - submission of an incident report under condition C10 of Schedule 2; - submission of an audit report under condition C15 of Schedule 2; or - any modification to the conditions of this consent.	Condition is addressed in Section 10 of the EMS. The Proponent will ensure that Management Strategies, Plans, and Programs will be reviewed and updated in accordance with the requirements of this Condition. If a Strategy, Plan or Program is updated, then the Proponent will comply with the requirements of Condition C3 regarding approval.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS		
Condition C3	With the approval of the Planning Secretary, the Applicant may: - 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).	The Project will be developed in two stages: - Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'. - Stage 2: Battery Storage Facility. The Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2. All other Strategies, Plans and Programs will be prepared and submitted for Stage 1, and then updated for Stage 2 where required. Updated Strategies, Plans and Programs will be submitted to the Planning Secretary for approval in accordance with Condition(c).
Condition C4	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.	The Proponent 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.
Condition 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 C16.

Condition	Condition wording	Commitment to Compliance
Condition 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.	The Project will be developed in two stages: • Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Storage Facility'. • Stage 2: Battery Storage Facility. The Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2. All other Strategies, Plans and Programs will be prepared and submitted for Stage 1, and then updated for Stage 2 where required.
NOTIFICATION OF DEPARTMENT		
Condition C7	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. 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.	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant will notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant will 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.
FINAL LAYOUT PLANS		
Condition C8	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including: 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. The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	Detailed plans of the final layout of the development was submitted to the Department via the Major Projects website on 7 November 2023, prior to the commencement of construction, in accordance with this Condition.
WORK AS EXECUTED PLANS		
Condition C9	Prior to commencing operations or following the upgrades of any wind turbines or ancillary infrastructure, the Applicant must submit work as executed plans of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.	Work As Executed Plans will be submitted to the Planning Secretary prior to commencing operations or following the upgrades of any wind turbines or ancillary infrastructure. Note: The Work as Executed Plans can only be produced upon completion of construction of the development.
INCIDENT NOTIFICATION		

Condition	Condition wording	Commitment to Compliance
Condition C10	The Department must be notified via the Major Projects website portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 9.	If the Applicant becomes aware of an Incident, the Department will be notified in writing via the Major Projects portal as soon as practicable. The requirements of Appendix 9 '<i>Incident Notification and Reporting Requirements</i>' are listed at the bottom of this Table. An Incident is defined as: <i>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.</i>

NON-COMPLIANCE NOTIFICATION

Condition C11	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	The Proponent will submit a written notification to the Department via the Major Projects website, within seven calendar days of becoming aware of any non-compliance. A non-compliance is defined as: <i>An occurrence, set of circumstances or development that is a breach of this consent.</i>
Condition C12	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Any non-compliance notification submitted to the Department under Condition C11 will address the requirements of Condition C12.
Condition C13	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance	The Proponent notes that a non-compliance does not need to be notified to the Department if it has already been notified as an Incident.

INDEPENDENT ENVIRONMENTAL AUDIT

Condition C15	Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	Unless otherwise agreed or directed by the Planning Secretary, an Independent Environmental Audit will be conducted in accordance with the timeframes nominated in the PAR (2020), being: • within the 12 weeks of the commencement of construction; • during construction, at intervals no greater than 6 months from the date of the initial audit; • within 6 months of commencement of operations; and at intervals no greater than 3 years from the initial operational audit.
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ACCESS TO INFORMATION

Condition	Condition wording	Commitment to Compliance
Condition C16	The Applicant must: d. make the following information publicly available on its website as relevant to the stage of the development: i. the EIS; ii. the final layout plans for the development; iii. current statutory approvals for the development; iv. approved strategies, plans or programs required under the conditions of this consent; v. the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi. 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; vii. a complaints register, which is to be updated on a monthly basis; viii. minutes of CCC meetings; ix. the annual Statement of Compliance with the EPL; x. any independent environmental audit, and the Applicant's response to the recommendations in any audit; and xi. any other matter required by the Planning Secretary; and keep this information up to date	The Proponent will make this information available on the website, including Management Strategies, Plans and Programs per item (iv).

Appendix B Approval for staging of plans



Planning,
Industry &
Environment

Leanne Cross
Environment Manager
CWP Renewables
PO Box 1708
Newcastle NSW 2300

15/03/2022

Dear Ms Cross

Uungula Wind Farm (SSD-6687) Staging of Strategies, Plans and Programs

I refer to your request dated 21 February 2022 advising the Department that CWP intends to develop the project in two distinct stages and seeking the Planning Secretary's approval to prepare and submit any strategy, plan or program required by the Development Consent for Uungula Wind Farm (SSD-6687) on a staged basis.

The Department notes that you intend to develop the project in two distinct stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery storage facility'
- Stage 2: Battery storage facility

The Department notes that the only strategy, plan or program not required for Stage 1 are the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39). All other strategies, plans or programs required by the Development Consent would be prepared and submitted for Stage 1 in accordance with the development consent, and then updated for Stage 2 where required.

Accordingly, under condition C3 of Schedule 3 of the Development Consent SSD-6687 the Secretary approves the submission of the relevant strategy, plan or program required by the Development Consent on a staged basis.

If you wish to discuss the matter further, please contact Natasha Homsey on 02 8275 1264 or at natasha.homsey@planning.nsw.gov.au.

Yours sincerely

A blue ink signature, likely of Nicole Brewer, consisting of stylized initials and a surname.

Nicole Brewer
Director
Energy Assessments

As nominee of the Secretary

Appendix C Environmental Policy



Environmental Policy

SQE-02-POL-022

Accountable EGM: *EGM Operations*
Publication: Internal Only

Revision Control

Revision	Date	Issue	Author	Reviewed	Approved	Signature
001	28/08/2025	Final/Issued	Candice Somerville	Alex Lovell Stuart Davis	Rob Wheals	
000	29/06/2023	Final/Issued	Alana Gordijn	Brendan McAvoy	Jason Willoughby	

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Related documents

Type	Title
Charter	SQE Health, Safety, Environment and Sustainability Committee Charter
Code	Code of Conduct

1 Introduction

1.1 Purpose

The purpose of this policy is to describe and communicate Squadron Energy's approach and ongoing commitment to environmentally sustainable practices which are central to our work and Vision.

1.2 Scope

The Environmental Policy (Policy) applies to Squadron Energy Services Pty Ltd and its affiliates (including trusts) in the Squadron Energy group of companies (Squadron Energy, or 'SQE').

This policy applies to all employees and all persons performing work at the direction of, or on behalf of, SQE (for example, contractors, consultants, temporary staff and 'workers' as otherwise defined under the Work Health and Safety Act 2011), collectively referred to as 'Staff'.

This Policy does not form part of any Staff contract of employment or any contract for services between SQE and any Employee who does not have a contract of employment with SQE.

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

3 Audit/Review

SQE undertakes to regularly review this policy to take account of changes in legislation. At minimum, a review will be undertaken within 24 months from the date of this policy. SQE reserves the right to vary, replace or terminate this policy from time to time. All staff are required to comply with changes to this Policy.

4 Variation

Squadron Energy reserves the right to vary, replace or terminate this Policy from time to time. SQE undertakes to regularly review this policy to take account of changes in relevant legislation. All Staff are required to comply with this Policy as varied or replaced.

5 Relevant legislation and standards

Type	Title
Legislation	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
Legislation	Environmental Planning and Assessment Act 1979 (NSW)
Legislation	Protection of the Environment Operations Act 1997 (NSW)
Legislation	Environmental Protection Act 1994 (QLD)
Legislation	Environment Protection Act 2017 (VIC)
Legislation	Climate Change Act 2022 (Cth)
Standard	ISO 14001:2015 – Environmental Management Systems

6 What happens if this Policy is not followed

The directions contained within this Policy are authorised by the Chief Executive Officer for SQE. Failure to comply with a direction contained in this document or its related documents may constitute a breach of the Code of Conduct and/or may also result in the potential breach of the associated legislation.

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.

