

INDEPENDENT AUDIT NO. 3 (IA3)


AUDIT REPORT

Uungula Wind Farm

SSD 6687

May 2026

Authorisation

Author name	Maulik Bapodara
Author position	Lead Auditor
Author signature	
Date	04/06/2026

Document Revision History

Revision	Date	Details
Draft	22/05/2026	Draft for issue to Squadron Energy
Final	04/06/2026	Revised following comments from Squadron Energy and HBI internal review

Report Name: Independent Audit No. 3 – Audit Report, Ungula Wind Farm

Project No.: 260312

Prepared for:

Squadron Energy
Wiradjuri Country
16-18 Maughan Street
Wellington NSW 2820

Prepared by:

Maulik Bapodara
Healthy Buildings International Pty Ltd
Suite 2.06, Level 2, 29-31 Solent Circuit
Norwest NSW 2153

Disclaimer

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.



Contents

EXECUTIVE SUMMARY 5

1. INTRODUCTION 6

 1.1 The Project 6

 1.1.1 Overview 6

 1.1.2 Changes to the Project 7

 1.1.3 Staging 9

 1.1.4 Works conducted during the audit period 9

 1.2 Audit team 12

 1.3 Audit objectives 13

 1.4 Audit scope 13

 1.5 Audit period 14

2. AUDIT METHODOLOGY 15

 2.1 Audit process 15

 2.2 Audit process detail 15

 2.2.1 Audit initiation and scope development 15

 2.2.2 Preparing audit activities 19

 2.2.3 Personnel involvement 20

 2.2.4 Meetings 22

 2.2.5 Site inspection 22

 2.2.6 Document review and interviews 22

 2.2.7 Generating audit findings 23

 2.2.8 Compliance evaluation 23

 2.2.9 Evaluation of post audit approval documentation 24

 2.2.10 Completing the audit 24

3. AUDIT FINDINGS 25

 3.1 Approvals and documents audited, and evidence sighted 25

 3.2 Non-compliances and Observations 27

 3.3 Adequacy of CEMP and post approval documents 33

 3.4 Summary of notices from agencies 34

 3.5 Other matters considered relevant by the Auditor or DPHI 34

 3.6 Environmental Performance 43

 3.6.1 Actual versus Predicted Impacts 43



3.6.2	Physical extent of the development	49
3.6.3	Incidents and non-compliance.....	49
3.6.4	Complaints	49
3.6.5	Compliance	49
3.6.6	Adequacy of CEMP and sub-plans	49
4.	CONCLUSION	51
5.	LIMITATIONS	52
	APPENDIX A – SSD 6687 CONDITIONS OF APPROVAL AUDIT TABLE.....	53
	APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS	54
	APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS	56
	APPENDIX D – CONSULTATION RECORDS.....	65
	APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS.....	94
	APPENDIX F – AUDIT REPORT DECLARATIONS.....	120



EXECUTIVE SUMMARY

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with an audit site inspection on 13 May 2026 of the Uungula Wind Farm – SSD 6687.

This audit is the Third Independent Audit (IA3) conducted for the Project; the temporal period covered by the audit is from the date of the second audit site inspection on 18 November 2025 to the date of the third audit site inspection on 13 May 2026 and as described within this report.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSD 6687 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan, sub-plans and associated Procedures. Specifically, this audit was required to satisfy Condition C15 of SSD 6687 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated March 2026 (DPHI, 2026).

In summary, a total of **86 conditions** were assessed, 61 conditions were considered to be compliant, 23 conditions were considered not triggered, two self-reported non-compliances were noted in the audit period, and one observation (opportunity for improvement) was identified during this Audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of the Audit Scope. The level of implementation of these requirements was also observed as high.

The Auditors would like to thank the Auditees from Squadron Energy (SQE/the Proponent), Nacap Pty Ltd, CPP, Transgrid, and Downer Pty Ltd for their organisation, cooperation and support during the conduct of the audit.

1. INTRODUCTION

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on 13 May 2026 of the Uungula Wind Farm Project under State Significant Development (SSD) 6687.

This audit is the third independent audit conducted for the Project and has been conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated March 2026 (Department of Planning Housing and Infrastructure (DPHI), 2026).

1.1 The Project

1.1.1 Overview

Uungula Wind Farm Pty Ltd submitted a State Significant Development (SSD) application to construct and operate the Uungula Wind Farm project under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Minister's Conditions of Approval (MCoAs) were issued for the State Significant Development (SSD) Project No 6687 Uungula Wind Farm on 7 May 2021 (UWF Planning Approval).

The Project is located in the Dubbo Regional Council Local Government Area (LGA), within the Central West and Orana region of NSW. Refer Figure 1 for Project location and context.

The key features of the Project include:

- 69 wind turbines (as modified; the Approval), associated infrastructure and associated turbine hardstands and crane hardstand areas
- Battery Energy Storage System of up to 150 MW / 150 MWh (being developed in the Stage 2)
- Connection to TransGrid's existing 330 kV Transmission line that traverses the northern part of the project site and up to 3 substations
- Electrical infrastructure including 12km of 330kv high-voltage transmission lines from the Switching Station adjacent to Transmission Line (TL) 79 and across Twelve Mile Road, down to the Main Substation, two operations and maintenance compounds
- Temporary and permanent ancillary infrastructure on site to facilitate the construction and operation of the turbines
- Temporary facilities, including site offices and compounds, rock crushing and concrete batching plant, stockpiles and materials
- Upgrades to several local and regional roads and intersections to cater for construction
- Traffic and enable turbines to be delivered to the site using over dimensional vehicles and delivery of oversize and over mass (OSOM) components
- Utility services and signage
- Substation
- Switching Station



1.1.2 *Changes to the Project*

Project Approval SSD 6687 for the Project was issued on 7 May 2021.

Modifications

The Project Approval has been modified (outside the audit period) with the details of modifications summarised below:

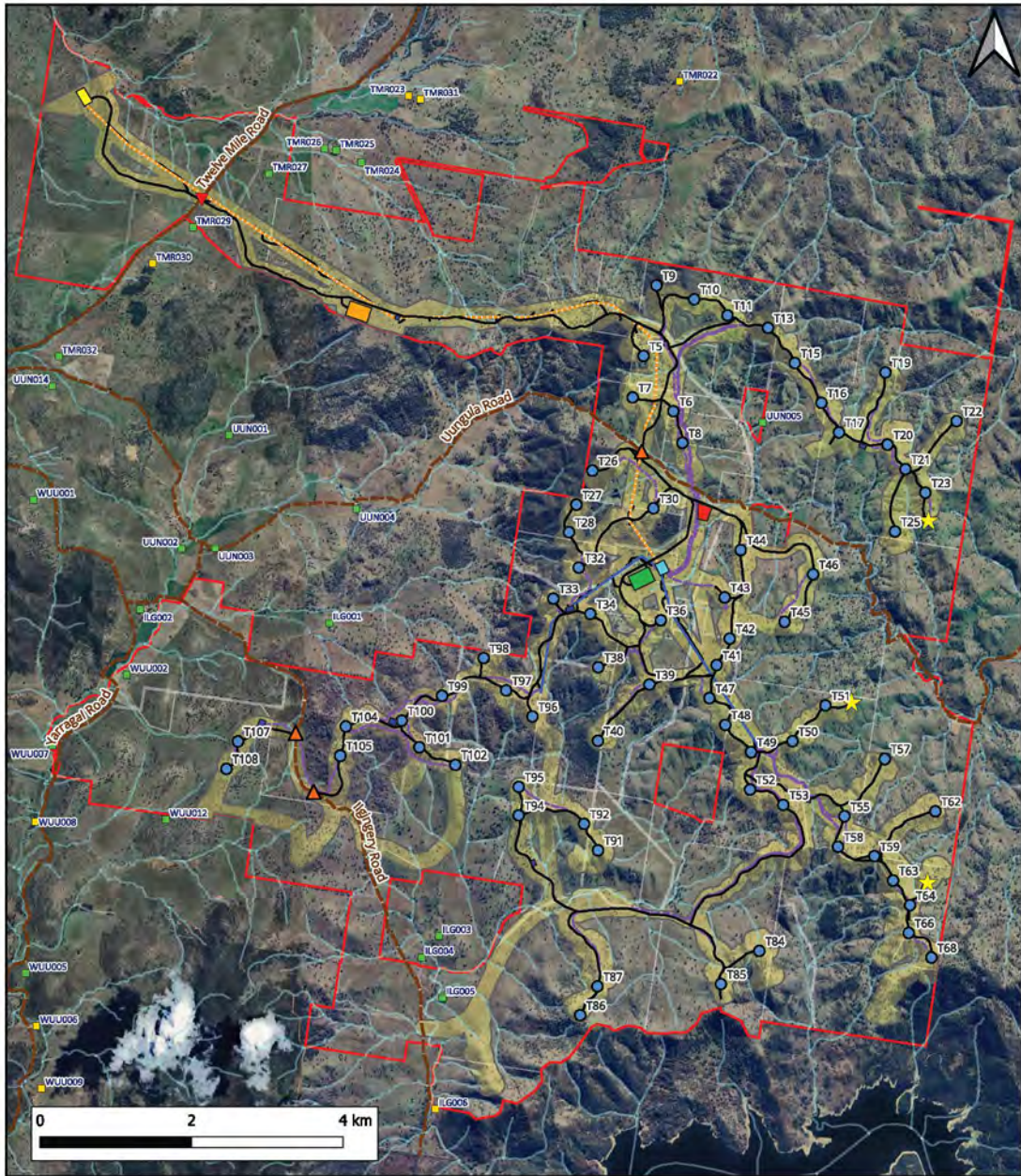
- **Modification 1 (SSD 6687 Mod 1) determined on 21 April 2022:** The modification included removal of turbines and changes to site layout.
- **Modification 2 (SSD 6687 Mod 2) determined on 2 December 2022:** The modification included update to subdivision plans.
- **Modification 3 (SSD 6687 Mod 3) determined on 4 September 2025:** The modification included approval of minor additional road upgrades. Condition B11(a) was included as part of this modification.

Further detail on the approved modifications are available on the NSW planning portal.

Consistency Assessments

There were no Consistency Assessments determined and approved by the Proponent within this audit period.





<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> 	<table border="1" style="width: 100%;"> <tr> <td colspan="2">Company</td> <td colspan="3">SQUADRON ENERGY</td> </tr> <tr> <td colspan="5">Title</td> </tr> <tr> <td colspan="5" style="text-align: center;">UUNGULA WIND FARM - FINAL LAYOUT PLAN</td> </tr> <tr> <td>Date</td> <td>Projection</td> <td>Drawing No</td> <td>Rev</td> <td>Ver</td> </tr> <tr> <td>7/11/2023</td> <td>GDA94 Zn55</td> <td>UWF-02-FLP</td> <td>2</td> <td>A</td> </tr> <tr> <td>Drawn By</td> <td>Checked By</td> <td>Sheet</td> <td>Proj Code</td> <td>Size</td> </tr> <tr> <td>A GORDJN</td> <td>S KIDZIAK</td> <td>1 OF 1</td> <td>UWF</td> <td>A3</td> </tr> </table>	Company		SQUADRON ENERGY			Title					UUNGULA WIND FARM - FINAL LAYOUT PLAN					Date	Projection	Drawing No	Rev	Ver	7/11/2023	GDA94 Zn55	UWF-02-FLP	2	A	Drawn By	Checked By	Sheet	Proj Code	Size	A GORDJN	S KIDZIAK	1 OF 1	UWF	A3
Company		SQUADRON ENERGY																																					
Title																																							
UUNGULA WIND FARM - FINAL LAYOUT PLAN																																							
Date	Projection	Drawing No	Rev	Ver																																			
7/11/2023	GDA94 Zn55	UWF-02-FLP	2	A																																			
Drawn By	Checked By	Sheet	Proj Code	Size																																			
A GORDJN	S KIDZIAK	1 OF 1	UWF	A3																																			

Figure 1: Project Location and Context (Source: UWF Final Layout Plan Rev 2, UWF NSW Planning Portal)



1.1.3 Staging

The Project's staging is detailed in Section 1.2 of the Environmental Management Strategy (Revision 006, dated 16 April 2026), which states below:

"The Project will be developed in two stages:

- Stage 1: Wind Farm and associated infrastructure with the exception of the 'Battery Energy Storage System (BESS)'.
- Stage 2: Battery Energy Storage System (BESS).

In accordance with Condition C3 of SSD-6687, the Planning Secretary has agreed that the Fire Hazard Analysis (condition B38) and Fire Safety Study (condition B39) are only required for Stage 2."

Stage 1 is the subject of this audit.

1.1.4 Works conducted during the audit period

As per the notification letter to DPHI from the Proponent (dated 28 March 2025), and DPHI's response to the Proponent (dated 1 April 2025), the construction commencement date for the Project is 31 March 2025. Construction related activities completed during the audit period are summarised below as detailed in the Proponent's Monthly Project Reports:

- December 2025
 - Commencement of civil area 1 (CG7) excavation works
 - Rehabilitation and drainage work civil areas CG1, 2, 3, 5, 6 and 7
 - Bulk earthworks civil areas CG1, 2, 3, 4, 5 and 6
 - Crushing operations civil areas CG4 and 6
 - Foundation excavation and blinding works civil areas CG1, 3, and 4
 - Foundation anchor cages, reinforcing and concrete pours civil areas CG2 and 6
 - Backfill works CG2 and 5
 - Pavement works CG2 and 5
 - Temporary and permanent met mast installation
 - Twelve Mile Road / Goolma Road intersection construction
- January 2026
 - Rehabilitation and drainage work CG1, 2, 3, 5, 6 and 7
 - Bulk earthworks CA 4, 6 and 7.
 - Crushing operations CG4 and 6
 - Foundation excavation and blinding works CG1
 - Foundation anchor cages, reinforcing and concrete pours CG2, 3 and 6



- Backfill works CG2, 5 and 6
- Pavement works CG2 and 5 February 2026
- Civil area 1 (CG7) excavation works continued
- Temporary and permanent met mast installation
- Twelve mile road / Goolma road intersection - completion
- February 2026
 - Civil area 01 – advancement in cut to fill activities
 - Vegetation clearing commenced
 - Transgrid assets works/substation works
 - Installation of overhead wiring towers
 - Switching station works
 - Transgrid / Lumea switching station:
 - Earthing installation ongoing
 - Conduit installation ongoing
 - Transgrid / Lumea transmission line:
 - Tower foundations – 28/28 completed.
 - Tower erection to base – 28/28 completed
 - Tower erection completed – 28/28 completed
 - Transgrid / Lumea substation:
 - Erosion sediment control and temporary fencing work ongoing.
 - Bulk earthworks and crushing operations continued
 - Drainage works commenced
 - Twelve mile road / Goolma road intersection construction with traffic switchover
 - Met mast installation
 - Internal access tracks/roads - vegetation clearing and topsoil strip
 - Access roads and hardstand blasting
 - Internal access tracks/roads - cut / fill, subgrade and compact road
 - Internal access tracks/roads - pavement / capping
 - Hardstand and laydown - cut / fill, subgrade and compact
 - Hardstand and laydown - pavement / capping
 - Drainage works
 - Foundation excavation works
 - Foundation trim/conduit/inspect
 - Blinding, reinforcement, and concrete pouring for foundations



- Foundation backfill
- GE/NACAP access track and hardstand walkdowns for handover
- Rehabilitation works
- March 2026
 - Civil area 01 – advancement in cut to fill activities
 - Vegetation clearing
 - Transgrid assets works/substation works
 - Installation of overhead wiring towers
 - Switching station works
 - Transgrid / Lumea switching station:
 - Earthing installation ongoing
 - Conduit installation ongoing
 - Transgrid / Lumea substation:
 - Erosion sediment control and temporary fencing work completed
 - Bulk earthworks and crushing operations continued
 - Drainage works commenced
 - Twelve Mile Road / Goolma Road intersection construction with traffic switchover
 - Met mast installation
 - Internal access tracks/roads - vegetation clearing and topsoil strip
 - Access roads and hardstand blasting
 - Internal access tracks/roads - cut / fill, subgrade and compact road
 - Internal access tracks/roads - pavement / capping
 - Hardstand and laydown - cut / fill, subgrade and compact
 - Hardstand and laydown - pavement / capping
 - Drainage works
 - Foundation excavation works
 - Foundation trim/conduit/inspect
 - Blinding, reinforcement, and concrete pouring for foundations
 - Foundation backfill
 - GE/NACAP access track and hardstand walkdowns for handover
 - Rehabilitation works
- April 2026
 - Civil area 01 – advancement in cut to fill activities
 - Vegetation clearing



- Transgrid assets works/substation works
- Installation of overhead wiring towers
- Transgrid / Lumea switching station:
 - Earthing installation ongoing
 - Conduit installation ongoing
- Transgrid / Lumea substation:
 - Erosion sediment control and temporary fencing work completed
 - Bulk earthworks and crushing operations continued
 - Drainage works commenced
- Met mast installation continued
- Internal access tracks/roads - vegetation clearing and topsoil strip
- Internal access tracks/roads - cut / fill, subgrade and compact road
- Internal access tracks/roads - pavement / capping
- Hardstand and laydown - cut / fill, subgrade and compact
- Hardstand and laydown - pavement / capping
- Drainage works
- Foundation excavation and backfilling works continued
- Foundation trim/conduit/inspect
- Blinding, reinforcement, and concrete pouring for foundations
- Foundation backfill
- GE/NACAP access track and hardstand walkdowns for handover
- Rehabilitation works

1.2 Audit team

In accordance with Condition of Approval (CoA) C15 of SSD 6687, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; with the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Endorsement of the audit team was provided by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 16 October 2025. The endorsement is presented in **Appendix B**. Table below presents the audit team endorsed for this Independent Audit on the Project and the Lead Auditor's declaration is presented in **Appendix F**.



Table 1 Audit Team

Name and Position	Company	Audit Role	Certification
Maulik Bapodara	Healthy Buildings International Pty Ltd (HBI)	Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-462181)
Swathi Gowda	Healthy Buildings International Pty Ltd (HBI)	Audit Support	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)

1.3 Audit objectives

This third independent audit is to satisfy CoA C15 (refer below) of the State Significant Development (SSD) 6687 planning approval for the Project, which states:

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 (2026), unless otherwise agreed or directed by the Planning Secretary.

This third Independent Audit (IA3) aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

The audits would be conducted at least as frequently as specified in Table below:

Table 2 Construction Audit Frequency (IAPARs, March 2026)

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial independent audit or as otherwise agreed by the Secretary

In order to meet the above, the audit site inspection commenced on 13 May 2026.

1.4 Audit scope

The third Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance and Reporting. The scope of the third Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified; the Approval) Schedule 1, Parts A, B, C and Appendices 1 to 9, in particular those conditions and requirements which are applicable to the stage of the Project (i.e. since construction commencement on 31 March 2025)



- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Construction Environmental Management Plans and Sub-plans established in relation to construction
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level assessment of whether Environmental Management Plans and Sub-plans established in relation to construction are adequate and
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

1.5 Audit period

The temporal period covered by the audit is from the previous audit site inspection on 18 November 2025 to the date of the third audit site inspection on 13 May 2026.



2. AUDIT METHODOLOGY

2.1 Audit process

The third Independent Audit was conducted in a manner consistent with the below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements March 2026 (DPHI, 2026)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.2 Audit process detail

2.2.1 *Audit initiation and scope development*

The Auditee organisations (together referred to as the Auditee/s or construction team) were identified as follows:

- Squadron Energy (the Proponent); and
- Nacap Pty Ltd (Construction Contractor)
- Consolidated Power Projects (CPP)
- Transgrid
- Downer

Personnel representing the Auditees are identified in Section 2.2.3 of this third Independent Audit Report. Prior to the commencement of the audit the following tasks were completed:

- Confirmation with DPHI on agreed audit team;
- Consultation with DPHI on the audit scope; and
- Development of an Audit Plan detailing the audit objectives, scope, audit period and indicative audit program.

The Lead Auditor consulted with DPHI on 30 March 2026 to obtain inputs to the scope of this third Independent Audit in accordance with Section 3.2 of the IAPARs.


DPHI responded on 14 April 2026 with key issues, focus areas and further requests to consult with other agencies. A summary of the key issues and areas of focus raised by DPHI and other agencies is presented in Table 3. Consultation records are presented in **Appendix D**.



Table 3 Key issues and areas of focus raised during stakeholder consultation

Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
DPHI	<p>Scope consultation correspondence sent to DPHI on 30 March 2026. DPHI responded on 14 April 2026 with the following:</p> <ul style="list-style-type: none"> • “Whilst, the Department is satisfied with the proposed scope, the IEA is to address all conditions of Consent for the project and meet the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020). • Please ensure you consult with the following agencies: <ul style="list-style-type: none"> - Local Council – Dubbo Regional Council - Environment Protection Authority - Transport for NSW - NSW DCCEEW CPHR - Heritage NSW - CASA - Civil Aviation Safety Authority <p>As part of your scope can you also address/review the following aspects in detail:</p> <ul style="list-style-type: none"> • Details of the works that have been undertaken so far at the Project. • Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20. • Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also, that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes. • Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for: <ul style="list-style-type: none"> - Traffic and Road impacts - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts - Out of Hours impacts 	<p>The details of the specific elements of DPHI’s requests are provided in Table 8 of this Audit Report. Refer consultation records in Appendix D.</p>



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	<ul style="list-style-type: none"> - Noise and Vibration impacts - Visual and Lighting impacts - Storage and Handling of Dangerous Goods - Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans. • Are accurate records are being kept, specifically in relation to community complaints and actions. • On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented. • There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.  <p>The Proponent should review the Audit Report prior to submission to the Department, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.</p> <p>Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2026 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus, the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise)."</p>	



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
Heritage NSW	<p>Scope consultation correspondence sent to Heritage NSW on 17 April 2026. Heritage NSW responded on 24 April 2026 with the following:</p> <p><i>“Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.</i></p> <p><i>It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.”</i></p>	<p>The details of the specific elements of Heritage NSW requests are provided in Table 8 of this Audit Report. Refer consultation records in Appendix D.</p>
Dubbo Regional Council (DRC)	<p>Scope consultation correspondence sent to Dubbo Regional Council on 17 April 2026. DRC provided the following response on 18 May 2026:</p> <p><i>“Roadworks at the Goolma/Twelve Mile Road intersection appear to be complete, however this would require confirmation from TfNSW. As part of these works the original Twelve Mile Road section of the intersection has been permanently closed to the public and rehabilitation works are now complete. DRC had joint responsibility with TfNSW to ensure compliance with this condition.”</i></p>	<p>The details of the specific elements of DRC requests are provided in Table 8 of this Audit Report. Refer consultation records in Appendix D.</p>
Transport for New South Wales (TfNSW)	<p>Scope consultation correspondence sent to TfNSW 17 April 2026. TfNSW provided the following response on 20 April 2026:</p> <p><i>“Compliance with Instrument of Consent transport-related conditions</i></p> <p><i>Implementation and enforcement of shuttle bus arrangements</i></p> <p><i>Management of construction traffic volumes during AM and PM peak periods</i></p> <p><i>Any pre-construction minor works mitigation measures and associated Planning Secretary approvals</i></p> <p><i>Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)</i></p> <p><i>Commitments made within the Environmental Impact Statement (EIS)</i></p> <p><i>Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions</i></p> <p><i>Effectiveness of mitigation measures detailed within the TMP</i></p> <p><i>Alignment between assessed and actual traffic volumes and vehicle characteristics</i></p> <p><i>Suitability of existing intersection treatments under cumulative background and project traffic</i></p>	<p>The details of the specific elements of TfNSW requests are provided in Table 8 of this Audit Report. Refer consultation records in Appendix D.</p>



Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
	<p><i>Ongoing appropriateness of approved OSOM routes for the configurations being utilised</i></p> <p><i>Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response</i></p> <p><i>Audit report outcomes and recommended actions relevant to the State road network.”</i></p>	
New South Wales Environmental Protection Authority (NSW EPA)	Scope consultation correspondence sent to NSW EPA on 17 April 2026. No response was provided by NSW EPA prior to the third independent audit site inspection.	Not Applicable
New South Wales Department of Climate Change Energy Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation Group (CPHR)	<p>Scope consultation correspondence sent to NSW DCCEEW CPHR on 17 April 2026.</p> <p>NSW DCCEEW CPHR responded on 21 April 2026 noting the brief for the third Independent Audit and stated that they had no further issues to be addressed.</p>	Not Applicable. Refer consultation records in Appendix D .
Civil Aviation Safety Authority (CASA)	<p>Scope consultation correspondence sent to CASA on 17 April 2026.</p> <p>CASA responded on 7 May 2026 noting the scope of the audit and provided the following feedback:</p> <p><i>“International standards require 2,000 candela lighting intensity on the nacelle (also recommended in the NASF guideline) and 200 candela at the mid-point of the turbine mast. CASA recommends that 200 candela as a minimum intensity lighting on the nacelle would suffice (due mainly to the lack of background lighting in the vicinity of the turbines).”</i></p>	The details of the specific elements of CASA requests are provided in Table 8 of this Audit Report. Refer consultation records in Appendix D .

2.2.2 Preparing audit activities

The Lead Auditor performed a document review, prepared an Audit Plan with an indicative program and prepared an Audit Table (refer **Appendix A**) for this Independent Audit. The proposed audit plan was provided to the Proponent on 30 March 2026 (refer **Appendix C**), in preparation for the Audit. The Audit Plans were updated following feedback from the stakeholders and were provided to the Proponent on 12 May 2026.



2.2.3 *Personnel involvement*

Table 4 presents the involvement of key personnel representing the Auditees in this third Independent Audit.

Opening and closing meeting attendance is presented separately in **Appendix C**.



Table 4 Key personnel involved

Organisation	Project Stage	Position Title	Name	Involvement
Consolidated Power Projects	Stage 1	Environment Manager	Ben Bennett	Opening/closing meetings (refer Appendix C Attendance)
Squadron Energy	Stage 1	Senior Environmental Advisor	Dean Woods	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
Squadron Energy	Stage 1	Corporate Environment Manager	Candice Somerville	Opening/closing meetings (refer Appendix C Attendance)
Squadron Energy	Stage 1	Project Director	Sanjay Goel	Opening/closing meetings on Microsoft Teams (refer Appendix C Attendance)
Downer	Stage 1	Environment Advisor	Brittany Goss	Opening/closing meetings (refer Appendix C Attendance), and site inspection
Transgrid	Stage 1	Environment Business Partner	Jose Nascimento	Opening/closing meetings (refer Appendix C Attendance), and site inspection
Nacap Pty Ltd	Stage 1	Land Environment and Cultural Heritage Manager	Shaun Smith	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review



2.2.4 Meetings

Opening and closing audit meetings were held, as follows:

- Opening meeting: 13 May 2026
- Closing meeting: 13 May 2026

Opening and closing meeting attendance is presented in **Appendix C**.

2.2.5 Site inspection

An audit site inspection was conducted on 13 May 2026 as part of this third Independent Audit by the Lead Auditor. During the site inspection the weather conditions were generally cool and sunny, with the daytime temperature ranging from approx. 8.8°C to 23.3°C. No rainfall was recorded in the week prior to the site inspection. The following sites were visited during the audit site inspection:

- Main Site compound including carparking for light vehicles
- Workshop Areas
- Batching Plant
- Switching Yard (Downer/Transgrid)
- Substation (Downer/Transgrid)
- Civil Area 1 (CG7)
- Civil Area 2 (CG6)
- Civil Area 3 (CG2)
- Civil Area 5 (CG5)
- Civil Area 6 (CG4)
- Civil Area 7 (CG3)

Site inspection observations and photographs are presented in **Appendix E**.

2.2.6 Document review and interviews

The third Independent Audit included investigation and review of documents, reports and records to evaluate compliance. Interviews with key Project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees during the course of the audit.

Refer to Section 2.2.3 for details on the personnel interviewed. Audit interviews and document review sessions were conducted with the Auditees as follows:

- Auditees: 13 May 2026 (face-to-face)

The documents sighted are included in the **Appendix A**.



In addition to the above, the Auditors requested further information to obtain evidence that was not accessible or available during the audit interviews and document reviews. These requests were provided promptly by the Auditees within required timeframes.

2.2.7 *Generating audit findings*

Independent Audit findings were based on verifiable evidence collected and reviewed. The evidence typically included:

- Relevant correspondence from DPHI and any other stakeholders
- Review of relevant records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspections of relevant locations, activities and processes
- Monitoring data and/or analysis
- Other applicable approvals, permits, records or Project-specific environmental requirements (as documented within the Audit Table in **Appendix A**).

2.2.8 *Compliance evaluation*

Evaluation of compliance has been carried out in accordance with Section 3.7 of the IAPARs and documented in an Audit Table, which includes the conditions of SSD 6687. The compliance status of each compliance requirement in the Audit Table has been determined using the relevant descriptors in Section 3.8, Table 2 of the IAPARs, as listed in Table, below:

Table 5 Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

As part of this third Independent Audit evaluation, the Lead Auditor has made observations and notes to provide context, identify any opportunities for improvement (OFI) in relation to any compliance requirement or any other aspect of the Project. This includes any positive observations where the project has applied initiatives beyond compliance requirements.

The compliance status has been attained by assessing a representative sample of documents, records and data for each requirement in the audit period prescribed. Observations on-site during



the audit site inspections are based on current activities and assumed to be representative of the auditee's performance across the Project.

2.2.9 *Evaluation of post audit approval documentation*

The Lead Auditor reviewed and assessed whether post approval documents relevant to the applicable Stage:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate and
- have been implemented in accordance with the conditions of consent for the Project

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document or
- whether there are any opportunities for improvement.

2.2.10 *Completing the audit*

A draft of the third Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. The audit findings have been determined independent of the Auditees, DPHI and any other parties, based on the evidence assessed during the audit.



3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed as part of the audit are listed below. This list is not exhaustive. The full set of documents and relevant evidence sighted against each requirement is detailed within the Audit Table (refer **Appendix A**).

- Environmental Impact Statement, prepared by Eco Logical Australia Pty Ltd Final – Rev A dated 20/05/2020
- Response to Submissions v01 dated 09/11/2020
- Modification Report 1 dated 17/03/2022
- Modification Report 2 dated 06/10/2022
- Modification Report 3 dated 04/09/2025
- DPHI letter to the Proponent dated 15/03/2022 of approval to submit the plans on a staged basis per the request.
- Notification of commencement of construction – letter from the Proponent to DPHI dated 28/03/2025 and DPHI response to the Proponent dated 1/4/2025
- Final Layout Plan v2 dated 7/11/2023
- UWF Environmental Management Strategy rev 006 dated 17/04/2026 (awaiting DPHI approval), rev 005 dated 17/03/2025, Rev004 was approved by DPHI on 27/06/2023
- Biodiversity Management Plan rev 005 dated 31/08/2023, DPHI approval on 22/09/2023
- Revised Biodiversity Offset Liability – letter from SQE to CPHR and letter from DPHI to SQE dated 31/03/2026
- Areas of Sensitive Vegetation Maps
- Project Monthly Report – December 2025
- Project Monthly Report – January 2026
- Project Monthly Report – February 2026
- Project Monthly Report – March 2026
- Project Monthly Report – April 2026
- UWF Bird and Bat Adaptive Management Plan rev 6a dated 26/02/2024
- UWF Emergency Management Plan v03 dated 10/04/2026, DPHI approval of rev 03 on 04/05/2026
- UWF Heritage Management Plan v005 dated 19/07/2024, DPHI approval on 06/09/2024
- UWF Traffic Management Plan v005a dated 27/03/2025, DPHI approval on 28/03/2025
- UWF Accommodation and Employment Strategy rev0 dated 09/06/2023
- Overarching construction program as of 13 May 2026



- Details of works undertaken dated 16/10/2025
- UWF-NACAP-EHS-PLN-0006 EMP Rev3 - NACAP Environmental Management Plan dated 13/11/2025
- UWF-NACAP-CIV-PLN-0010 - Environmental Management Plan - Pre-Construction Works and Public Road Upgrades (3) rev 01 dated 31/10/2024
- UWF-NACAP-CIV-PLN-0027 - Clearing and Measurement Plan - rev 7 dated 18/03/2025
- UWF-NACAP-EHS-PLN-0011 - Drill and Blast Management Plan dated 23/03/2025
- UWF-NACAP-MAN-PLN-0004 - Construction Traffic and Access Management Plan dated 29/10/2024
- Email correspondence between SQE and TfNSW regarding Goolma Road/Twelve Mile Rd formal Practical Completion walk/inspection
- SQE Goolma Road/Twelve Mile Road Stockpile removal photographic evidence (aerial photograph: DJI_20260510082624_002_D.jpg)
- NACAP Field Emergency Response Guide 2064-HS-004-2 Rev 1.4 dated 11/11/2025
- NACAP attended Noise Monitoring Record for concrete pour dated 20/04/2026
- NACAP attended Noise Monitoring Record for WTGs dated 26/04/2026
- NACAP attended Noise Monitoring Record for WTG094 OOHW dated 04/05/2026
- NACAP dewatering record dated 20/02/2026
- Voluntary planning agreement – Dubbo Regional Council dated 20/12/2021
- Pre-Construction Road Dilapidation Report v1 dated 17/11/2022
- Complaints register 2024-2025 as of 13 May 2026
- Community Consultative Committee (CCC) Meeting Minutes dated 12/02/2026
- CCC Meeting Presentation fated 12/02/2026
- Community Newsletters dated November 2025 and February 2026
- Erosion and sediment control plans prepared and implemented by the construction contractor as evident during the site inspection on 13 May 2026
- Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 20/12/2024
- Vegetation Disturbance Permit – Nacap – dated 13/04/2026
- Land Disturbance Permit – Downer – dated 20/08/2025
- GDA2020_UWF_RegionalVegMapping_v2 – updated Baseline Vegetation Mapping dated 16/10/2025
- Weekly Inspection Checklists – NACAP dated 26/03/2026, 17/04/2026, 24/04/2026, 08/05/2026
- Weekly Inspection Checklists – CPP dated 13/02/2026 and 25/02/2026
- Weekly Inspection Checklists – Downer dated 30/01/2026, 06/02/2026, 08/04/2026, 10/04/2026, 17/04/2026, 21/04/2026, 23/04/2026, 5/5/2026, and 6/5/2026
- Toolbox Talk records dated OOHW dated 27/09/2025, and Rehabilitation works dated 22/10/2025



- Weekly Staff Meeting dated 26/05/2025
- IVMS Road Use – geofencing data map
- Downer Construction Environmental Management Plan Uungula Wind Farm Connection Works, UWFC-DOW-PLN-GEN-0011 dated 18/11/2025
- Downer Environmental Compliance Obligations Register dated October 2025
- Downer OOHW Permit 1 – Power Outage requirements related to Transmission Line 79
- Downer OOHW Permit 2 – Power Outage requirements related to Transmission Line 79
- Downer Dewatering Permits Register dated 22/09/2025
- Downer ESCPs Overhead Transmission Line Towers 1 to 5, 6 to 13, 14 to 21 and 22 to 28
- Downer Substation Disturbance Permit dated 20/09/2025 and relevant appendices 1 to 9
- Downer Switching Station Disturbance Permit dated 10/04/2025
- Downer Substation and Switching Station Flood Modelling dated 5/06/2024
- Downer Water Take Records/Invoices dated 21/11/2025

3.2 Non-compliances and Observations

This Section presents findings from the third Independent Audit. A summary of conditions assessed and compliance status from the third Independent Audit is presented in Table 6. Detailed audit findings and evidence against each requirement is presented in the Audit Table (refer **Appendix A**).

Table 6 Summary of conditions assessed and compliance status from the third Independent Audit

Part of the Project Approval	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	22	15	1 (self-reported against CoA A2(b))	6
Part B	48	34	1 (self-reported against CoA B35)	13
Part C	16	12	0	4
Total	86	61	2	23

With respect to this third Independent Audit:

- **86** conditions were assessed.
- **Two self-reported non-compliances were noted** during the audit period
- **61** conditions were considered to be compliant.
- **23** conditions were considered not triggered.



In addition to the above, **one observation (opportunity for improvement)** was identified as detailed in **Table 7**.





Table 7 Initial Independent Audit Findings

Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
1	NC	Self-reported Non-Compliance	<i>Condition A2(b)</i>	<p>SQE self-reported a non-compliance to DPHI on 10/12/2025 regarding CoA A2(b):</p> <p>“While ongoing consultation with Transport for NSW, the Department, and EnergyCo has occurred as required, Ungula Wind Farm Pty Ltd (UWF) has not submitted the required 2-monthly consultation letter reports via the Major Projects Portal within the specified timeframe.</p> <p>This constitutes non-compliance with Schedule 2 Condition A2(b) and the written direction from the Department that was issued on 28 March 2025.</p> <p>The Lead Auditor has sighted a letter from DPHI to SQE dated 14/01/2026 which notes that the Department has reviewed the non-compliance notification and considers it to generally satisfy Schedule 2 Condition C11 of the Consent. The Department’s acceptance of this notification is not an endorsement of the compliance status of the project.</p>	<p>SQE to maintain ongoing consultation with all relevant parties and continue submitting letter reports every two months to DPHI via the Major Projects Portal as per DPHI written direction.</p>	Ongoing





Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
				The Lead Auditor also noted that the non-compliance with Schedule 2 Condition A2(b) has been assessed by the Department in accordance with its Compliance Policy, with the Department on this occasion determining to record the breaches with no further enforcement action proposed.		
2	NC	Self-reported Non-Compliance	<i>Condition B35</i>	<p>SQE self-reported a non-compliance to DPHI on 31/03/2026 in relation to CoA B35 which states:</p> <p>Prior to the construction of any wind turbine or wind monitoring mast, the Applicant must provide the following information to CASA, Airservices Australia, and RAAF (together the authorities):</p> <p>(a) co-ordinates in latitude and longitude of each wind turbine and mast;</p> <p>(b) the final height of each wind turbine and mast in Australian Height Datum;</p>	<p>Actions undertaken by SQE:</p> <p>Submit all outstanding notifications to CASA, Airservices Australia, and the RAAF for any meteorological monitoring masts where pre-construction notification requirements were not previously fulfilled, ensuring these are not already covered by post-construction notifications;</p> <p>Conduct a detailed internal investigation to determine the root cause of the notification oversight. The investigation will review project records, communication logs, and compliance tracking systems to identify any gaps or process failures that led to the missed notifications. A comprehensive review of compliance across all relevant conditions</p>	CLOSED





Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
				<p>(c) ground level at the base of each wind turbine and mast in Australian Height Datum;</p> <p>(d) confirmation of compliance with any OLS; and</p> <p>(e) details of any proposed aviation hazard lighting.</p> <p>During the EMS audit completed on 31 March 2026, insufficient evidence was available to confirm that all required notifications had been provided to CASA, Airservices Australia and the RAAF prior to the construction of some meteorological monitoring masts, as required by Condition B35.</p>	<p>will also be undertaken. Findings from the investigation will inform improvements to internal procedures and staff training, with the aim of preventing recurrence and strengthening future compliance efforts; and</p> <p>Continue to provide pre-construction notifications for all wind turbines and wind monitoring masts to CASA, Airservices Australia and the RAAF, in accordance with Condition B35.</p>	
2	OFI	Observation (Opportunity for Improvement)	<i>Condition B16</i>	<p>During the site inspection on 13 May 2026, it was observed that the transmission towers were installed across the sites by Downer and erosion and sediment controls were in place. Some controls were observed to be in poor state.</p>	<p>Downer is recommended to:</p> <ol style="list-style-type: none"> 1. Conduct maintenance, repair, or replacement of all degraded silt fences and sediment controls identified across the transmission tower alignment and around stockpiles. 	OPEN





Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
					2. Reinstate controls to comply with the project's Erosion and Sediment Control Plan (ESCP) and Blue Book standards.	



3.3 Adequacy of CEMP and post approval documents

As part of the Audit, the Lead Auditor reviewed the Construction Environmental Management Plan and sub-plans (refer Section 3.1 for references) and conducted a high-level assessment of whether the above documents:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions of consent for the Project.

The Lead Auditor also assessed the adequacy of post approval documents (on the basis of whether):

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

The evidence reviewed and/or sighted during this third Independent Audit indicates that these documents are being implemented; with two self-reported non-compliances during the audit period, and one observation (opportunity for improvement) identified (refer Table 7).



3.4 Summary of notices from agencies

During the conduct of the third Independent Audit and interviews, the Auditees have confirmed that there were no notices from agencies during the Audit Period.

3.5 Other matters considered relevant by the Auditor or DPHI

As requested by DPHI, the below presents a review of key DPHI scope consultation issues and areas of concerns reviewed as part of this third Independent Audit and summarised below:

Table 8 Key issues and areas of focus raised by DPHI and other stakeholders

Authority	Key Issues and Areas of Focus	Assessment and commentary
DPHI	<p><i>Whilst, the Department is satisfied with the proposed scope, the IEA is to address all conditions of Consent for the project and meet the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020).</i></p>	<p>This audit was conducted in accordance with CoA C15 and the IAPARs.</p> <p>Consideration and commentary for DPHI matters are provided separately in this Section 3.5 and Table 8 (this table).</p> <p>Assessment of compliance with SSD 6687 Conditions, as applicable to the relevant stage of the Project (Stage -1, as noted in Section 1.4). Refer Audit Table within Appendix A.</p> <p>Environmental performance assessment (including but not limited to actual versus predicted impacts) is included in Section 3.6.</p> <p>A high-level assessment of the environmental management plans and sub- plans as related to construction is included in Sections 3.3 and 3.6</p> <p>DPHI scope is summarised in this Table, with a detailed review of all applicable Conditions relevant to the stage being assessed as part of the audit to address DPHI’s request and included in the Audit Table against these specific conditions, as relevant (refer Appendix A). Where these specific conditions may have interactions with other CoAs, an assessment of those requirements have been included as audit evidence and findings in the Audit Table (refer Appendix A).</p>



	<p><i>Please ensure you consult with the following agencies:</i></p> <ul style="list-style-type: none"> • Local Council - Dubbo Regional Council • Environment Protection Authority • Transport for NSW • NSW DCCEEW CPHR • Heritage NSW • CASA - Civil Aviation Safety Authority 	<p>Consultation with other agencies has been undertaken and records are provided in the Appendix D. No response has been received from NSW EPA. Responses received from DRC, NSW DCCEEW CPHR, TfNSW, CASA and Heritage NSW are provided within this Table 8.</p>
	<p><i>Details of the works that have been undertaken so far at the Project</i></p>	<p>Monthly reports for the project were sighted by the Lead Auditor which include details of the works undertaken so far at the Project including civil, electrical works at substation, and at switching station.</p>
	<p><i>Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.</i></p>	<p>The Lead Auditor has sighted the following documents related to biodiversity management and implementation of measures listed including pre-clearance checklists, hold point release, pre-construction commencement checklists, no-go zones established, Switching Station Disturbance Permit, Substation Disturbance Permit as sighted during the site inspection on 13 May 2026:</p> <ul style="list-style-type: none"> • Environmental Management Strategy EMS v6, dated 17/04/2026 • Biodiversity Management Plan v5 dated 31/08/2023, approved by DPHI dated 22/09/2023 • Bird and Bat Adaptive Management Plan v6a, dated 22/01/2024, approved by DPHI dated 22/02/2024 • Pre-clearance checklist dated 29/05/2025 for Civil Area 2 prepared by the construction contractor • Pre-construction commencement checklist (hold point release) dated 29/04/2025 prepared and released by the Construction Contractor • Revised offsets liability request was made by the Proponent to DPHI on 19/05/2023 and was accepted by DPHI on 15/06/2023 • Updated revised offset liability request was made by the proponent to DPHI on 31/03/2026 and was accepted by DCCEEW CPHR on 1/05/2026 • Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity




		<p>Conservation Fund for an offset obligation dated 20/12/2024</p> <ul style="list-style-type: none"> • Downer Substation Disturbance Permit dated 02/09/2025 • Downer Switching Station Disturbance Permit dated 10/04/2025 <p>The proponent submitted a Baseline Mapping request to DPHI dated 30/08/2021 providing details on the additional targeted survey effort undertaken for the Eastern Pygmy Possum and Squirrel Glider, in accordance with Condition B21(a). DPHI approval of the Baseline Mapping request was issued on 30/09/2021.</p> <p>Clearing Impacts are currently being tracked throughout construction period as evident through the implementation of pre-clearance checklists and post-clearing surveys sighted by the Lead Auditor.</p> <p>No non-compliance, incidents were raised as evident in the project monthly reports sighted by the Lead Auditor.</p>
	<p><i>Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also, that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.</i></p>	<p>The Lead Auditor sighted sample records regarding deliveries of transmission lines tower related over size/over mass deliveries using the designated roads/vehicle routes. The Proponent reported that there has been non-blade components of the WTGs delivered in late April 2026.</p> <p>The Lead Auditor sighted a letter from the Proponent to DPHI regarding request to vary road upgrade timing under Condition B30 on 06/03/2026 (request was made to allow non-blade Over Size Over Mass (OSOM) deliveries through the Mitchell Highway and Goolma Road intersection in Wellington, NSW). DPHI approved the request via a letter dated 27/03/2026.</p>
	<p><i>Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:</i></p> <ul style="list-style-type: none"> • Traffic and Road impacts • Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts • Out of Hours impacts 	<p>Traffic and Road Impacts are managed by implementation of Construction Traffic Management Plan. During the audit site inspection on 13 May 2026, the Lead Auditor observed presence of traffic control on roads, signage and speed limits. Refer example photographs in Appendix E.</p> <p>During the audit site inspection on 13 May 2026, the Lead Auditor observed the presence of exclusion zones or no-go zones around cultural heritage sensitive areas, and around the</p>



	<ul style="list-style-type: none"> • Noise and Vibration impacts • Visual and Lighting Impacts • Storage and Handling of Dangerous Goods 	<p>vegetation to be retained including hollow bearing trees. Refer example photographic evidence in Appendix E.</p> <p>Compliance documentation regarding Out Of Hours Works Approvals related to intersection upgrade works and transmission tower/line isolation were sighted during the audit interviews. The Lead Auditor also sighted the noise monitoring records related to OOHW undertaken which confirmed no exceedance of the relevant adopted criteria. No noise related complaints were noted in the audit period.</p> <p>Regarding Visual and Lighting impacts, no issues were noted during the audit site inspection and documentation review. Wind turbine construction has not commenced as of 18/11/2025. The Lead Auditor has sighted the below documents in relation to CoA B4:</p> <ul style="list-style-type: none"> • 106901-01_Uungula_WF_Obstacle Lighting Risk Assessment_v1.1_230505 • 106901-01.1_Uungula_WF_Lighting Design Plan_v2.0_230613 • CASA Approval of the above documents dated 20 June 2023. <p>With regards to Storage and Handling of Dangerous Goods, the Lead Auditor observed appropriate storage of two large fuel tanks (70,000L each) at the workshop area during the audit site inspection, adequate and fully stocked spill kits, self-bunded generators with secondary bunding. No other issues were noted on site. The Lead Auditor noted ten minor incidents within the project monthly reports and no reportable incidents were noted during the documentation review.</p>
	<p><i>Sediment and erosion controls are installed and in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans.</i></p>	<p>During the audit site inspection on 13 May 2026, the Lead Auditor reviewed the erosion and sediment control plans and their implementation on site. It was evident that the controls were installed in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and the relevant management plans and the approved EMS.</p>
	<p><i>Are accurate records are being kept, specifically in relation to community complaints and actions.</i></p>	<p>Community complaints register (up to 13 May 2026) was sighted during the audit and details are provided in section 3.6.4 and in the Audit Table in Appendix A.</p>



		<p>In line with the CoA C16, the Lead Auditor has sighted the Complaints Register on Squadron Energy - UWF website dated May 2026 'https://www.squadronenergy.com/our-projects/Uungula-wind-farm'</p>
	<p><i>On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.</i></p>	<p>During the site inspection on 13 May 2026, the Lead Auditor reviewed controls including exclusion zone presence, air monitoring, covered and labelled asbestos containing material stockpiles and presence of qualified asbestos hygienist on site. Lead Auditor also sighted community notifications and correspondence with relevant agencies.</p>
	<p><i>There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.</i></p> 	<p>During documentation review, Lead Auditor reviewed photographic evidence supplied by the Proponent in relation to the concerned site and noted that stockpile has been removed from the area and site has been landscaped (Appendix D – Site Inspection photos).</p>
	<p><i>This email is to be appended to the Audit Report.</i></p>	<p>The final audit report includes all consultation records (Appendix D).</p>
	<p><i>The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Consent relating to Independent Environmental Audits have been met.</i></p>	<p>The Proponent has been given a copy of this Audit Report for comment (refer Section 2.2.10). It is the responsibility of the Proponent to submit the final audit report to DPHI and meet relevant requirements of the Consent.</p>
	<p><i>Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus, the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to</i></p>	<p>The Lead Auditor conducted a site inspection on 13 May 2026. A review of documentation including CEMP and subplans, other management plans, complaints, incidents was undertaken via face-to-face interview and desktop audit with Squadron Energy, CPP, Transgrid and the construction contractors Downer, and Nacap Pty Ltd as part of the site inspection and audit interviews on 13 May 2026.</p>



	<p><i>"the auditor" in the PARS includes all approved auditors (lead and otherwise).</i></p>	
<p>Heritage NSW (DCCEEW)</p>	<p>Heritage NSW (DCCEEW) provided the following feedback in relation to the audit scope:</p> <p><i>"Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.</i></p> <p><i>It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project."</i></p>	<p>No-go zones related to heritage areas were in place as evident during the audit site inspection on 13 May 2026 (refer Appendix E for example photographs).</p> <p>Areas of Aboriginal Locales located outside the development footprints were marked on construction related maps (examples of sighted documents include Civil Area 03 and 04 Environmental Control Map, Sensitive Areas Map related to Transgrid/Downer works, and LECH Pre-Commencement Form 2) as sighted by the Lead Auditor during documentation review.</p> <p>The following additional evidence was sought and sighted by the Lead Auditor:</p> <ul style="list-style-type: none"> • Rapid Global UWF Online Induction March 2026 (including the requirements of Aboriginal heritage and historical heritage) • Induction records of personnel trained • Unexpected finds register which included no unexpected finds during the audit period • No heritage related incidents noted during the audit period as sighted within the Project Monthly Reports and incidents register <p>Aboriginal Site Impact Recording Forms (ASIRFs) were completed and included in the Final Aboriginal Cultural Heritage Salvage Report dated 24/01/2025. No new issues were raised during IA#3.</p> <p>Consultation records (as of 22/07/2024) were sighted to be included within the HMP. The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). No new issues were raised during IA#3.</p> <p>No other issues related to heritage were raised during this audit.</p>



<p>Dubbo Regional Council (DRC)</p>	<p>DRC provided the following response on 18 May 2026:</p> <p><i>“Roadworks at the Goolma/Twelve Mile Road intersection appear to be complete, however this would require confirmation from TfNSW. As part of these works the original Twelve Mile Road section of the intersection has been permanently closed to the public and rehabilitation works are now complete. DRC had joint responsibility with TfNSW to ensure compliance with this condition.”</i></p>	<p>The Lead Auditor has sighted correspondence between the Proponent and TfNSW regarding completion of roadworks at Goolma Rd and Twelve Mile Road intersection.</p> <p>As per the correspondence between the Proponent and DRC, as of 19 May 2026, the project is currently waiting on TfNSW to provide a full Practical Completion (PC) or Partial PC pending confirmation and or rectification of minor defects.</p>
<p>Transport for New South Wales (TfNSW)</p>	<p>TfNSW provided the following response on 20 April 2026:</p> <p><i>“Compliance with Instrument of Consent transport-related conditions</i></p> <p><i>Implementation and enforcement of shuttle bus arrangements</i></p> <p><i>Management of construction traffic volumes during AM and PM peak periods</i></p> <p><i>Any pre-construction minor works mitigation measures and associated Planning Secretary approvals</i></p> <p><i>Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)</i></p> <p><i>Commitments made within the Environmental Impact Statement (EIS)</i></p> <p><i>Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions</i></p> <p><i>Effectiveness of mitigation measures detailed within the TMP</i></p> <p><i>Alignment between assessed and actual traffic volumes and vehicle characteristics</i></p> <p><i>Suitability of existing intersection treatments under cumulative background and project traffic</i></p> <p><i>Ongoing appropriateness of approved OSOM routes for the configurations being utilised</i></p> <p><i>Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response</i></p> <p><i>Audit report outcomes and recommended actions relevant to the State road network.”</i></p>	<p>Compliance with the transport and traffic related conditions was verified during site inspection and documentation review. Refer document evidence verified by Lead Auditor in Audit Table - Appendix A.</p> <p>The audit findings noted that the operational reality aligns with the approved Traffic Management Plan (TMP, Version 007C, updated March 2026). The site's principal contractors (e.g., Nacap, Downer) are operating under the controls established in the CTAMP. Evidence verified by the Lead Auditor included Daily traffic controller logs, internal site access audits, and subcontractor induction records confirming adherence to designated haulage routes.</p> <p>The Lead Auditor cross-referenced active traffic operations with the mitigation measures committed to in Chapter 14 (Traffic and Transport) of the original EIS and subsequent Modification applications (MOD 1, MOD 2 and MOD 3). Evidence verified included implementation of dust suppression on unsealed public access routes, driver code of conduct signoffs, and community notification logs for all project works and high-impact OOH works.</p> <p>Construction traffic is actively managed to avoid compounding local background peaks on the Mitchell Highway and Goolma Road. Heavy vehicle delivery windows are restricted, and workforce shift changes are staggered outside of local school bus and standard commuter peak hours. Evidence verified included delivery scheduling software entries, and heavy vehicle arrival timestamps.</p> <p>All minor works, early-stage clearing, and initial intersection configurations undertaken prior to the main construction phase were executed under appropriate approvals. Evidence sighted</p>





		<p>during previous IAs (IA#1 and IA#2) included pre-clearing checklist dated July 2025.</p> <p>The distribution model assumed in the original TIA (e.g., heavy vehicle splits between the Port of Newcastle haulage corridor and local quarry sourcing paths) was tested against actual procurement data. Evidence sighted including material supply dockets and quarry dispatch tickets. The geographic origin of materials matches the distribution vectors assumed in the TIA, validating the original impact footprint model.</p> <p>The actual volume of heavy vehicles (HV) and light vehicles (LV) on-site remains within the upper-bound envelopes predicted in the TIA as sighted on vehicle log samples. Vehicle characteristics (axle configurations, heavy vehicle classifications) match those modelled for civil works and turbine foundation delivery phases. Evidence sighted included plant and equipment onboarding/induction register.</p> <p>The Lead Auditor noted that the mitigation suite (including variable message signs (VMS), pilot escort protocols, and unsealed road watering) is highly effective. Community complaints regarding traffic numbers or driver behaviour have been negligible during the audit period. Evidence sighted including presence of water carts on site during site inspection, VMS boards, pilot vehicles escorting OSOM deliveries at the time of site inspection, and complaints register dated May 2026.</p> <p>As sighted in the project monthly reports, and as per the correspondence between the Proponent and TfNSW, the Q1 2026 completion of physical upgrades at the Goolma and Twelve Mile Road intersection has successfully mitigated localised turning risks. Design finalisation and TfNSW approvals for the Mitchell Highway intersection were also sighted, further confirming that active traffic control measures currently manage risks safely pending final civil completion.</p> <p>The Lead Auditor sighted documentary evidence in relation to OSOM deliveries: Approved National Heavy Vehicle Regulator (NHVR) permits, Route Suitability Assessments (Rex J. Andrews TMP Rev 08), and Road Occupancy Licences (ROL). Deliveries are strictly coordinated around specific geometry</p>
--	--	--



		<p>constraints, ensuring the configurations utilized match the cleared physical swept paths.</p> <p>The audit reviewed all environmental and safety incidents recorded during the audit period to identify traffic-related non-compliances. No systemic breaches of traffic volumes or route deviations occurred. Minor deviations (e.g., isolated driver speed non-compliance on internal tracks) were met with immediate corrective action, including toolbox talks related to traffic and transport and enforcement of the Driver Code of Conduct. Construction contractor has also established speed warning system on site which was evident during the site inspection.</p> <p>It is recommended that the Proponent continue maintaining regular coordination sessions with TfNSW and neighbouring Renewable Energy Zone (REZ) developers to proactively manage cumulative OSOM scheduling as WTG components continue to arrive through mid-2026.</p>
<p>CASA</p>	<p>CASA provided the following feedback on 7 May 2026:</p> <p><i>“CASA reviewed the Aviation Lighting Plan on behalf of Squadron Energy (refer to enclosed email) and CASA still recommends Aviation Lighting.</i></p> <p><i>There was an OBSTACLE LIGHTING RISK ASSESSMENT by Aviation Projects dated 05 May 2023.</i></p> <p><i>One difference being with the NASF Guidelines being:</i></p> <p><i>International standards require 2,000 candela lighting intensity on the nacelle (also recommended in the NASF guideline) and 200 candela at the mid-point of the turbine mast. CASA recommends that 200 candela as a minimum intensity lighting on the nacelle would suffice (due mainly to the lack of background lighting in the vicinity of the turbines).”</i></p>	<p>The Lead Auditor has sighted the Aviation Lighting Plan dated 13/06/2023 which confirms low intensity steady red lights of a minimum intensity of 200 candela (cd).</p>



3.6 Environmental Performance

3.6.1 Actual versus Predicted Impacts

Actual versus Predicted Impacts

A qualitative assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (prepared by CWP Renewables, dated 20 May 2020) for the Project, was conducted as part of this Audit.

The overall actual impacts were found to be consistent with the predicted impacts relevant to the construction phase of the development during the audit period.

Table 9 Actual versus Predicted Impacts

Aspect	Summary of predicted impacts	Summary of actual impacts observed during the audit site inspection and audit period	Consistent (Yes, No or Not Applicable)
Landscape and Visual	The Project is situated in a gently rolling landscape primarily used for agricultural grazing. Impacts to nearby receptors are noted.	<p>The construction activities undertaken during this audit period resulted in minimal landscape and visual impacts.</p> <p>The updated Site Final Layout v2 (dated 07/11/2023), approved by DPHI via an email to the Proponent on 17/11/2023 indicates a reduction in WTG numbers, from 93 to 69; with WTGs yet to be constructed. Non-blade WTG parts (OSOM deliveries) occurred on site in late April 2026.</p>	Yes
Noise and Vibration	The Project is situated in a primarily agricultural area with low ambient noise levels. Community consultation has highlighted concerns about noise generation.	<p>The Lead Auditor noted that there were no noise related complaints and no vibration complaints recorded on the Complaints Register in the audit period. Refer Section 3.6.4.</p> <p>The Lead Auditor sighted noise monitoring records dated 20/02/2026, 20/04/2026, 26/04/2026 and 04/05/2026 in accordance with the approved EMS and CEMP. The audit confirmed the implementation of Construction Environmental Management Plan which includes Noise and Vibration Management measures.</p> <p>No non-compliances were recorded by the Proponent in the audit period as evident in the</p>	Yes





		Project Monthly Report. No non-compliances related to noise and vibration were raised during this audit.	
Biodiversity	The Project will unavoidably impact approximately 639 ha of native vegetation within the Development Corridor based on the current Development Footprint.	<p>It is understood from the auditees that the civil design is advancing with refinements to further reduce impacts (not sighted or verified further by the Lead Auditor).</p> <p>During the audit, documents were sighted including, Micrositing exercises dated 17 May 2023, incorporating ecological assessments, which have been conducted to minimise the biodiversity impacts of the development footprint. Additional measures to further reduce impacts are being considered during construction as evident by the Site final Layout Plan v2 confirming the reduction in WTGs from 93 to 69 minimising additional clearing requirements.</p> <p>Clearing impacts are being actively monitored throughout the construction period as evident in the DPHI approval letter dated 17/01/2025.</p>	Yes
Traffic and Transport	Traffic and transport impacts may result in various direct and indirect adverse effects, with concerns raised during community and stakeholder consultations.	Approved Traffic Management Plan v007c implementation was evident during the audit site inspection. There were no complaints recorded regarding traffic and transport during the audit period. The Lead Auditor has sighted the complaints register dated May 2026 which included no traffic related complaints in the audit period.	Yes
Aviation	Impacts to nearby airports and airports related aircraft activities. The findings of the Aviation assessment report identified Mudgee Airport and Dubbo Airport, Wellington aerodrome (Bodangora aerodrome), and the Gulgong Aero Park are all located within 30 nautical miles (nm) to the Project site. There is also high probability for numerous other aviation activities associated with unlicensed private air strips, including one known grass runway within the site boundary and three	Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit's scope.	Not Applicable





	<p>known grass airstrips upon adjacent land.</p> <p>The Project is not expected to have any impact on civil air traffic operating under either Instrument Flight Rules (IFR) or Visual Flight Rules (VFR) but will rather act as a prominent feature which may assist in visual navigation.</p>		
Telecommunications hazards and risks	<p>The impact assessment evaluated existing radio, telecommunications, and communication systems in the region and assesses potential interference from the Project. Large structures, such as Wind Turbine Generators (WTGs), could cause interference if located near or within signal paths. The assessment concludes that the Project will not impact existing signals or communication systems. However, caution is advised during WTG installation, with adjustments to planned positions as needed, within consent parameters, to minimize interference with television and radio broadcasting.</p>	<p>Actual impacts would be associated with the installation/operation of the wind farm and therefore not included in this audit's scope.</p>	<p>Not Applicable</p>
Electromagnetic fields	<p>The Project has assessed the occurrence of Electromagnetic Fields (EMFs) and potential radiation impacts, in line with relevant guidelines, focusing on human health, safety, and potential disruptions to existing services across all Project stages. EMFs are expected to be indistinguishable from naturally occurring background levels at the site boundary, posing no risk to the public or nearby electrical devices.</p>	<p>Actual impacts would be associated with the installation and operation of the electrical infrastructure and therefore not included in this audit's scope.</p>	<p>Not Applicable</p>
Low frequency noise and infrasound	<p>Aerodynamic noise from Wind Turbine Generators (WTGs) includes low-frequency noise (20 Hz to 100 Hz) and infrasound (below 20 Hz), generated when WTG blades encounter air stream disturbances from the tower. While WTGs produce some low-frequency noise and infrasound, sound levels at receptors over 200 meters away are imperceptible to the human ear. There is no evidence that infrasound below the hearing threshold causes physiological or psychological effects.</p>	<p>Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit's scope.</p>	<p>Not Applicable</p>



<p>Shadow flicker and blade glint</p>	<p>Shadow flicker, caused by intermittent shadows from Wind Turbine Generator (WTG) blades, and blade glint, the reflection of natural light off blade surfaces, may potentially disturb observers. Analysis of shadow flicker at dwellings near the Project, included in the visual impact assessment, indicates that no associated or non-associated dwellings are expected to exceed the recommended limit of 30 hours per year, as per the Draft National Guidelines. There is also negligible risk to passing motorists. Mitigation measures, standard for large-scale wind farms, incorporate design principles and advanced WTG technology to minimize these impacts. Shadow flicker at any dwelling must not exceed 30 hours annually unless prior agreements are made with affected landholders.</p>	<p>Actual impacts would be associated with the operation of the wind farm and therefore not included in this audit 's scope.</p>	<p>Not Applicable</p>
<p>Energy Storage facilities (ESF)</p>	<p>An assessment of the ESF and its associated risks was undertaken. The ESF, which will most likely be lithium-ion battery based, will allow the Project to store and dispatch scheduled and reliable energy to and from the Project. A preliminary hazard assessment and risk prioritisation considered lithium-ion batteries and found that not-insignificant but low-level hazards related to the Battery Energy Storage System (BESS) included electrocution, crushing and toxicity, whilst the medium level hazards included fire and explosion.</p>	<p>BESS is the Stage 2 of the development therefore has not been included in this audit's scope.</p>	<p>Not Applicable</p>
<p>Bushfire and electrical fire</p>	<p>The Project site encompasses areas ranging from low to high bushfire risk, as identified in the NSW Rural Fire Service bushfire-prone land mapping. The Bushfire Risk Assessment evaluates existing fire hazards and potential fire risks associated with the Project across its various development stages.</p>	<p>Approved Biodiversity Management Plan is being implemented during construction which details bushfire and electrical fire management measures.</p>	<p>Yes</p>
<p>Aboriginal cultural heritage</p>	<p>The Wiradjuri Aboriginal people have historically occupied the Study Area, using the land for hunting, fishing, and gathering, with extensive archaeological</p>	<p>Site salvage was completed on 24 January 2025 with the final report sighted by the Lead Auditor during documentation review in the IA#1.</p>	<p>Yes</p>





	evidence, primarily stone artefacts, confirming their presence. Field surveys and searches of the Aboriginal Heritage Information Management System (AHIMS) identified 168 Aboriginal sites, with no declared Aboriginal places. Over 370 stone artefacts were recorded across 42 sites, with 10 within the Ungula Wind Farm Development Footprint and two nearby, though most sites are outside the footprint and unlikely to be impacted.	<p>No-go zones related to heritage areas were in place as evident during the audit site inspection on 13 May 2026 (refer Appendix E for example photographs).</p> <p>There were no unexpected heritage finds or incidents identified during the audit period as per the project monthly reports and the project registers.</p>	
Historical Heritage	A search of relevant databases revealed that there are no heritage items within the Project Site listed on the Australian Heritage Database. A search of the Wellington Local Environmental Plan 2012 revealed that while there are various items listed as historic heritage of local significance within 5 km of the Project Site, there are no heritage items currently listed within the Project Site.	<p>No-go zones related to heritage areas were in place as evident during the audit site inspection on 13 May 2026 (refer Appendix E for example photographs).</p> <p>There were no unexpected heritage finds identified during the audit period as per the project monthly reports.</p>	Yes
Water and Soils	Construction activities, including wind turbine generators (WTGs), roads, and cable crossings, pose risks of erosion and sediment runoff, which could impact water quality.	<p>The Lead Auditor sighted CPESC endorsed ERSED plans which were developed and implemented for road upgrade works, and general civil works including access tracks installation to minimise soil erosion. Water carts were in use to minimise dust generation (sighted during the audit site inspection).</p> <p>Water use licences in place as per the evidence sighted by the Lead Auditor.</p> <p>The weekly inspection records prepared by the construction contractors NACAP and Downer were sighted which included focus on water quality, erosion and sediment control and contamination.</p> <p>ERSED controls were evident to be implemented during the site inspection on 13 May 2026.</p>	Yes
Resource Requirements and Waste	Project's resource requirements increasing pressure on local resources.	<p>During the audit site inspection, it was evident that waste management is being undertaken in accordance with approved EMS and NACAP CEMP Section 15.</p> <p>The auditees indicated that the resource requirements for the</p>	Yes





		<p>Project including the sourcing of cement, aggregate, sand, asphalt, water and road base material is undertaken locally where practical (records not sighted or verified further by the Lead Auditor).</p> <p>Imported material stockpiles were sighted during audit site inspection.</p>	
Socio-Economic Factors	<p>The Project would have an overall positive impact on the local and wider economy during both the construction and operational period. The Project will also have a number of social benefits including the potential for the community to directly invest in the Project. Host landowner properties will also benefit from the Project through the construction of new internal roads which reduce bushfire risks and decrease the likelihood of loss of buildings, machinery, livestock and fencing.</p>	<p>Approved Environmental Management Strategy, CEMP and subplans are in place and being implemented. Community complaints generally being managed as evident during the review of the complaints register and auditee interviews.</p>	Yes
Cumulative Impacts	<p>Cumulative impacts from other major and renewable energy projects within the vicinity. These projects include:</p> <ul style="list-style-type: none"> • Bodangora Wind Farm (operating). • Crudine Ridge Wind Farm (operational). • Liverpool Range Wind Farm (approved); and • Flyers Creek Wind Farm (approved). 	<p>Approved Environmental Management Strategy and CEMP and subplans are in place and being implemented as evident during the audit site inspection and auditee interviews.</p> <p>As sighted in the Community Newsletters and discussions with the proponent, for all nearby projects and other identified projects, the combined effect of temporal and spatial separation between the Project and other developments occurring, or proposed to occur, in conjunction with project specific mitigation measures are considered appropriate to satisfactorily mitigate potential cumulative impacts.</p>	Yes



3.6.2 *Physical extent of the development*

During the site inspection on 13 May 2026, an assessment of the physical extent of the development was limited to visual observations of sites inspected in relation to the approved project boundary. Property boundary agreements with the relevant landowners and details of no-go zones were sighted on site.

3.6.3 *Incidents and non-compliance*

Two self-reported non-compliances were noted during the audit site inspection (Refer to Table 7 for details), and ten minor incidents recorded as per the monthly reports reviewed by the Lead Auditor. No reportable incidents were noted within the incident register and the project Monthly Reports.

3.6.4 *Complaints*

The complaints register was reviewed and recorded two dust related complaints between 1 December 2025 and 13 May 2026 (Ref: Complaints Register, May 2026). The Lead Auditor noted that both complaints were responded to appropriately by the Proponent and closed.

It is noted that at the time of this Audit, specific stakeholder engagement was being undertaken by the Proponent to minimise further complaints. It is the Lead Auditor's opinion that consultation with the affected third parties has been conducted in a timely and effective manner. In that context, the Lead Auditor is of the opinion that complaints within the audit period were adequately responded to and managed.

3.6.5 *Compliance*

The Proponent regularly reviews compliance against the planning approval conditions in accordance with the compliance review process in the approved Environmental Management Strategy Rev 006 dated 16/04/2026.

Two self-reported non-compliances were noted within the audit period, and one observation was raised during this audit as included in Table 7 of this Audit Report.

3.6.6 *Adequacy of CEMP and sub-plans*

Refer Section 3.3 for a high-level assessment of the adequacy and implementation of the CEMP and sub-plans.

Overall Environmental Performance

The environmental performance of the Project during the audit period is considered to be high, noting below:





HBI

Healthy Buildings International

- The Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of this third Independent Audit's Scope.
- The implementation of the CEMP and subplans was further assessed on-site - with four observations (opportunities for improvement) raised during the audit period (refer Table 7 and Appendix E).
- As noted in this Audit Report, two self-reported non-compliances were noted and one observation (Opportunity of Improvement) was raised within the audit period.
- The Auditees were organised and responded promptly to additional information requests during this audit.



4. CONCLUSION

This Audit Report presents the findings from the third Independent Audit of the Ungula Wind Farm Project. The temporal period covered by the audit is from the date of the first Independent Audit on 20 June 2025 to the date of the audit site inspection on 13 May 2026.

With respect to this third Independent Audit Independent Audit:

- **86 conditions** were assessed.
- **2 self-reported non-compliances** were noted during the audit period.
- **61 conditions** were considered to be **compliant**.
- **23 conditions** were considered **not triggered**.

In addition to the above, **one observation (opportunity for improvement)** was identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to construction that formed a part of this third Audit's Scope. The implementation of these requirements on site was also observed as high.

The Lead Auditor would like to thank the Auditees from Squadron Energy, Nacap Pty Ltd, Downer, Consolidated Power Projects (CPP) and Transgrid for their organisation, cooperation and support during the conduct of this third Independent Audit.



5. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and HBI's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no fourth party may use or rely on this Report unless otherwise agreed by HBI in writing.

The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. HBI will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, HBI expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any fourth party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of HBI). HBI does not admit that any action, liability or claim may exist or be available to any fourth party. The scope of this audit does not cover a detailed verification of compliance with the conditions of the Deed, nor does it extend to the verification of items assessed by the Independent Certifier prior to issuing of a certificate for any stage.



APPENDIX A – SSD 6687 CONDITIONS OF APPROVAL AUDIT TABLE



Item	Details
Project Name:	Uungula Wind Farm SSD 6687
Auditee/Client	Squadron Energy
Lead Auditor:	Maulik Bapodara
Auditor/Audit Team:	Swathi Gowda
Audit Details:	Second Independent Audit (Construction)
HBI Project No.:	241116 Squadron Energy Uungula Wind Farm

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Modification #	Date
Modification 1	21-Apr-22
Modification 2	2-Dec-22
Modification 3	4-Sep-25

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1		In meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development.	<p>The Proponent reported that no material harm has occurred to the environment. Management plans being prepared for the development contain reasonable and feasible measures.</p> <ul style="list-style-type: none"> • Interview with the Auditees, 13/05/2026. • Site inspection, 13/05/2026 • Evidence referred to elsewhere within this Audit Table <p>Current approved management plans are being implemented:</p> <ul style="list-style-type: none"> • EMS v4, dated 19/06/2023, initially approved 27/06/2023 • EMS v5, dated 17/03/2025 • EMS v6, dated 16/04/2026 • EMP v3, dated 10/04/2026 • BMP v5 dated 31/08/2023, initially approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, initially approved 06/09/2024 • TMP v007C dated 15/05/2026, initially approved 28/03/2025 • OSOM Management Plan Appendices A to E • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006 • CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006 	C	<p>UWF SSD-6687 Mod-3 was approved by DPHI on 04/09/2025.</p> <p>As per the findings from this Audit, including any Non-Compliances and Observations raised throughout. The Lead Auditor has sighted the following approved documents:</p> <ul style="list-style-type: none"> • EMS v4, dated 19/06/2023, initially approved 27/06/2023 • EMS v5, dated 17/03/2025 • EMS v6, dated 16/04/2026 • EMP v3, dated 10/04/2026 • BMP v5 dated 31/08/2023, initially approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, initially approved 06/09/2024 • TMP v007C dated 15/05/2026, initially approved 28/03/2025 • OSOM Management Plan Appendices A to E • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006 • CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006
TERMS OF CONSENT					
A2		<p>The development may only be carried out:</p> <p>a in compliance with the conditions of this consent;</p> <p>b in accordance with all written directions of the Planning Secretary;</p> <p>c generally in accordance with the EIS; and</p> <p>d generally in accordance with the Development Layout in Appendix 2.</p>	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Evidence referred to elsewhere within this Audit Table. • The EMS and other management plans identify the relevant environmental and social issues applicable to the wind farm. Each Management plan includes a table of the conditions of consent that are applicable to the management plan. 	N	<p>As per the findings from this Audit, including any Non-Compliances and Observations raised throughout.</p> <p>The following non-compliances were noted and observation/Opportunity for Improvement (OFI) was raised during the audit period:</p> <ul style="list-style-type: none"> • Noted two self-reported Non-compliance against CoA A2(b) and B35 • An observation regarding poor maintenance of erosion and sediment controls around transmission towers (Downer)

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
A3		The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of:	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Evidence referred to elsewhere within this Audit Table. 	C	<p>Where applicable during the audit period the Proponent complied with the written requirements or directions of the Planning Secretary as evident during the documentation review, refer example documents below.</p> <p>The Lead Auditor has sighted the following approved documents:</p> <ul style="list-style-type: none"> EMS v4, dated 19/06/2023, initially approved 27/06/2023 EMS v5, dated 17/03/2025 EMS v6, dated 16/04/2026 EMP v3, dated 10/04/2026 BMP v5 dated 31/08/2023, initially approved 22/09/2023 BBAMP v6a, dated 22/01/2024, approved 22/02/2024 HMP v5 dated 19/07/2024, initially approved 06/09/2024 TMP v007C dated 15/05/2026, initially approved 28/03/2025 OSOM Management Plan Appendices A to E PIRMP v1, dated 23/9/2024 CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006 CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006
	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.			
A4		The conditions of this 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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 	C	Interview with the Proponent and the Construction Contractor confirmed no inconsistencies were identified during the audit period.
LIMITS ON CONSENT					
A5	Total Number of Wind Turbines	A maximum of 97 93 wind turbines may be constructed and operated on the site. The turbines may be replaced or upgraded as necessary from time to time in accordance with the conditions of this consent.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> Final Layout plan is for 69 wind turbines only. Final Layout Plan dated 7/11/2023 	C	The Lead Auditor has sighted documents titled 'Final Layout Plan v2 date 7/11/2023' and 'UWF Micrositing register'. The Final Layout Plan v2 (Source SSD 6687 - Major Project Website), includes 69 WTGs. DPHI email to the Proponent dated 17/11/2023 regarding the Proponent's submission of the Final Layout Plan v2. The DPHI advised to the Proponent that it had no comments on the document at the time.
A6	Wind Turbine Height	The maximum permitted height of any wind turbine (measured from above ground level to the blade tip) is 250 metres.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> Final layout plan is for 69 wind turbines only. Final Layout Plan dated 7/11/2023 Construction contract is for 69 wind turbines at max height of 250 metres. 	C	The Lead Auditor has sighted documents titled 'Final Layout Plan v2 date 7/11/2023' and 'UWF Micrositing register'. The Final Layout Plan v2 (Source SSD 6687 - Major Project Website) includes 69 WTGs. The Lead Auditor sighted DPHI email to the Proponent dated 17/11/2023 regarding the Proponent's submission of the Final Layout Plan v2. The DPHI advised to the Proponent that it had no comments on the document at the time.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
A7	Micro-siting Restrictions	Wind turbines and ancillary infrastructure may be micro-sited without further approval providing:	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Micro-siting report prepared by the Proponent addressing compliance with each requirement of A7. 	C	<p>The Lead Auditor sighted the document titled 'Report on Compliance with Micrositing Restrictions (Condition A7)' dated 17/05/2023 in relation to CoA A7.</p> <p>A document titled Uungula Wind Farm – Goolma Road and Twelve Mile Road Intersection - Aboriginal Cultural Heritage Salvage (dated 16 November 2023) was sighted which included a reference to setup of a temporary site compound and parking area within Lot 2/DP1141897 and that the proponent has sub-licence from DRC to use the land. The Proponent provided further evidence in the form of a document titled 'Licence Agreement Under Delegated Authority' dated 20 April 2021 which was sighted by the Lead Auditor.</p>
	a	the surface disturbance remains within the development corridor (with the exception of wind monitoring masts) shown on the figure in Appendix 2;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 2 Appendix A 		
	b	no wind turbine is moved more than 100 metres from the relevant GPS coordinates shown in Appendix 2;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> QGIS mapping of final microstied WTGs (Rev 11 layout), and spreadsheet demonstrating the distance of the WTGs is still within 100m of the approved WTG location. Spreadsheet saved on file. Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 3 Appendix B 		
	c	the revised location of the blade of a wind turbine is at least 50 metres from the canopy of existing hollow-bearing trees; or where the proposed location of the blade of a wind turbine is already within 50 metres of the canopy of existing hollow-bearing trees, the revised location is not any closer to the existing hollow-bearing trees;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> Micrositing report prepared to detail the compliance with this condition. the Proponent has prepared a report to demonstrate the separation distance and compliance. Per current Contract plans, 1 x monitoring mast will be located outside development corridor. Located adjacent Turbine 23. Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 3 Appendix B 		
	d	the revised location of the wind turbine and/or ancillary infrastructure would not result in any non- compliance with the conditions of this consent; and	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 4 		
	e	the wind monitoring masts are located within the development corridor where possible and their development would not result in any non-compliance with the conditions of this consent.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Report on Compliance with Micrositing Restrictions (Condition A7) dated 17/05/2023 section 5 		
BATTERIES					
A8	Battery Storage Restriction	Unless the Planning Secretary agrees otherwise, the battery storage facility or system associated with the development must not exceed a total delivery capacity of 150 MW.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Battery Energy Storage System (BESS) is stage 2 of the development and has not commenced yet. 	NT	<p>Operations have not commenced yet. Construction phase commenced on 31 March 2025 as per a letter from the Proponent to DPHI dated 28 March 2025 and is ongoing. As per the approved Environmental Management Strategy section 1.2 and a letter titled 'Staging of Strategies, Plans and Programs Approval', the BESS (stage 2) of the development has not commenced.</p>
		<i>Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage facility or system in the future.</i>	<ul style="list-style-type: none"> Operations have not commenced yet. 		

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
EVIDENCE OF CONSULTATION					
A9	Evidence of Consultation	Where conditions of this consent require consultation with an identified party, the Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • B21a - Baseline mapping. Consultation with NSW Department of Planning and Environment's Biodiversity, Conservation and Science Directorate (BCS). • B21b - Credit liabilities. Consultation with BCS. • B23 - Biodiversity Management Plan (BMP). Consultation with BCS. • B24 - Bird and Bat Adaptive Management Plan (BBAMP). Consultation with BCS. • B26 - Heritage Management Plan (HMP). Consultation with Heritage New South Wales (NSW). • B31 - Repair of damaged roads • B33 - Traffic Management Plan (TMP). Consultation with Dubbo Regional Council (DRC). and Transport for NSW. • B38 - Fire Hazard Analysis (battery) • B41 - Procedures to manage potential fires. Consultation with New South Wales Rural Fire Service (NSW RFS). • B45 - Accommodation and Employment Strategy. DRC 	C	<p>The Lead Auditor has sighted the evidence of consultation within the relevant management plans (further details are noted against each condition below):</p> <ul style="list-style-type: none"> • B21a - Baseline mapping. Consultation with BCS. • B21b - Credit liabilities. Consultation with BCS. • B23 - BMP. Consultation with BCS. • B24 - BBAMP. Consultation with BCS. • B26 - HMP. Consultation with Heritage NSW. • B31 - Repair of damaged roads • B33 - TMP. Consultation with DRC and TfNSW. • B38 - Fire Hazard Analysis (battery) • B41 - Procedures to manage potential fires. Consultation with RFS. • B45 - Accommodation and Employment Strategy. DRC. <p>The following evidence was sighted by the Lead Auditor in addition to the above:</p> <ul style="list-style-type: none"> • Meeting minutes regarding meeting with DPHI on 15 May 2025 • Meeting minutes regarding meeting with EPA on 16 May 2025 • Meeting minutes regarding meeting with TfNSW on 19 May
	a	consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and			
	b	provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.			
PROTECTION OF PUBLIC INFRASTRUCTURE					
A10		Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Construction contractor NACAP reported that there have been instances where repairs to Twelve Mile Road were required which are under maintenance agreement. Lead Auditor sighted the dilapidation reports. • Service lines were discovered during road works along Twelve Mile Road in 2024. Relevant road authority (TfNSW) was notified. Service relocation was undertaken as part of the Goolma Road and Twelve Mile Road intersection works. 	C	<p>The Lead Auditor sighted document titled 'UWF-NACAP-CIV-RPT-0017_0 Dilapidation Report dated 17/11/2022 and DPHI approval of it dated 6/6/2023 in relation to CoA A10.</p>
	a	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and			
	b	relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.			
		<i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by condition A14 of this consent.</i>			
DEMOLITION					
A11		The Applicant must ensure that all demolition work on site is carried out in accordance with AS 2601- 2001: The Demolition of Structures (Standards Australia, 2001), or its latest version.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • No demolition work undertaken to date. 	NT	The Lead Auditor has sighted monthly reports between December 2025 and March 2026 which included works undertaken till date, no demolition works were included in the list of completed activities.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
STRUCTURAL ADEQUACY					
A12		The Applicant must ensure that:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • As of 13/05/2026, Wind turbine Generator (WTG) construction has not commenced yet. No other buildings or structures have been constructed. 	NT	<p>During the site inspection on 13/05/2026, visual observations were made by the Lead Auditor and it was evident that WTG construction was not commenced.</p> <p>Operations and Maintenance Building construction was evident. Lead Auditor sighted architectural design certificates provided by SQE dated 27/01/2025 (includes design statement: The proposal has been designed for compliance with the requirements of AS. 1428 Access for People with a Disability in relation to access and servicing).</p>
	a	the wind turbines are constructed in accordance with the relevant standards, including the structural design requirements of IEC 61400-1 Wind turbines – Part 1: Design Requirements (or equivalent); and			
	b	all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.			
		<p>Notes:</p> <ul style="list-style-type: none"> • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • The EP&A Development Certification Regulation sets out the requirements for the certification of the development. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 			
COMPLIANCE					
A13		The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> • Memos and briefing has been provided to geotechnical contractors, the construction contractor (the Construction Contractor) to fulfil this requirement. • the Construction Contractor site induction include reference to Approvals and talk to requirement to be aware, understand and comply with conditions. • the Construction Contractor Induction Records and pre-start briefings. • the Construction Contractor Induction updated to include information regarding EPL requirements. 	C	<p>The Lead Auditor has sighted the following induction and toolbox talk records (prepared by the construction contractor NACAP) in relation to CoA A13.</p> <ul style="list-style-type: none"> • Rapid Global UWF Online Induction (including the requirements of SSD 6687) • Toolbox Talk - 22.10.2025 - Rehabilitation • Toolbox Talk - 27.09.2025 - OOHW • UWF- Weekly staff meeting - 28.08.25 • UWF- Weekly staff meeting - 18.09.25 • UWF- Weekly staff meeting - 25.09.25 • Induction details and personnel sign-on documents • CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006 • Downer induction details and sign-on documents
COMMUNITY ENHANCEMENT					
A14		Prior to commencing construction, or other timeframe agreed by the Planning Secretary, the Applicant must enter into a VPA with Council in accordance with:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> • Voluntary Planning Agreement (VPA), dated 20/12/2021, was executed by Uungula Wind Farm Pty Ltd and Dubbo Regional Council. Refer to Section 2 of the VPA. The executed VPA addresses the requirements from Appendix 3 of the Development Consent. 	C	The Lead Auditor has sighted the VPA between the Proponent and Dubbo Regional Council dated 20/12/2021.
	a	Division 7.1 of Part 7 of the EP&A Act; and			
	b	the terms of Council's letter dated 26 March 2021, which are summarised in Appendix 3.			
OPERATION OF PLANT AND EQUIPMENT					
A15		All plant and equipment used on site, or in connection with the development, must be:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>The following evidence was provided by the Proponent:</p> <ul style="list-style-type: none"> • All equipment used on site to date has been maintained in a proper and efficient condition. • the Construction Contractor maintains an inspection register for equipment • All equipment used on site to date has been operated in a proper and efficient manner. • the Construction Contractor maintains competency records 	C	The Lead Auditor has sighted plant and equipment inspection register and competency records as of May 2026 during site inspection with the Construction Contractor. Plant and equipment was being used on site at the time of inspection.
	a	maintained in a proper and efficient condition; and			
	b	operated in a proper and efficient manner.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
SUBDIVISION					
A16		The Applicant may subdivide the site comprising the site for the purposes of carrying out the development, in the following manner:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Subdivision has not yet occurred. 	NT	The Proponent reported that subdivision has not yet occurred however there was no evidence provided to the Lead Auditor to verify this.
	a	to create separate freehold titles for the purposes of the three substation options identified Appendix 4; and			
	b	to enable registration of leases on any title of the land comprising the site by: <ul style="list-style-type: none"> • registration of plans of subdivision for lease purposes; or • such other manner as may be required under the Conveyancing Act 1919 (NSW), as shown by the lease areas contained in Appendix 5, in accordance with the EIS and the requirements of the EP&A Act, EP&A Regulation and Conveyancing Act 1919 (NSW). 			
A17		For the avoidance of doubt, other than as permitted by condition A16(a) of Schedule 2, this consent does not permit the creation of new individual freehold titles as a result of the subdivision of existing freehold titles.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • No individual freehold titles have been created. 	C	The Proponent reported that new individual freehold titles have not been created however there was no evidence provided to the Lead Auditor to verify this. Switching yards is 95% complete and still under construction. Subdivision of the Lot has not yet
A18		Any subdivision certificate issued in relation to a plan of subdivision registered in accordance with condition A16(b) of Schedule 2 must contain a statement that the subdivision is only for the purposes of registering leases as set out in condition A16(b) of Schedule 2.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Subdivision has not yet occurred. 	NT	The Proponent reported that new individual freehold titles have not been created however there was no evidence provided to the Lead Auditor to verify this. Switching yards is 95% complete and still under construction. Subdivision of the Lot has not yet occurred.
A19		The consent for subdivision for lease purposes under condition A16(b) of Schedule 2 expires on the date the Secretary is satisfied that the site has been rehabilitated in accordance with condition 35 of Schedule 3.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • No rehabilitation has commenced. 	NT	The Proponent reported that no rehabilitation has occurred till date in accordance with CoA A19, however there was no evidence provided to the Lead Auditor to verify this. Switching yards is 95% complete and still under construction. Subdivision of the Lot has not yet occurred.
COMMUNITY CONSULTATIVE COMMITTEE					
A20		The Applicant must operate a Community Consultative Committee (CCC) for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016), or its latest version.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • CCC has been established and chaired by Garry West. CCC minutes are posted on website. • 20/01/2025: DPHI appointed Keiyana Guihout as a community representative to the UWF CCC. 	C	CCC meeting minutes between 20 November 2025 and 12 February 2026 were sighted by the auditor. Any enquiries or issues raised in the CCC meetings are resolved by the Proponent during or after each meeting as noted in the relevant minutes.
APPLICABILITY OF GUIDELINES					
A21		References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Evidence referred to elsewhere within this Audit Table. 	C	The Lead Auditor has sighted the approved Environmental Management Strategy v006 dated 16/04/2026 and the contractor CEMP v2 dated 30/05/2025 that include references to all applicable guideline, protocol, Australian Standard or policy within their relevant sections.
A22		However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Evidence referred to elsewhere within this Audit Table. 	C	The Lead Auditor has sighted the approved Environmental Management Strategy v006 dated 16/04/2026 and the contractor CEMP v2 dated 30/05/2025 that include references to all applicable guideline, protocol, Australian Standard or policy within their relevant sections.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B1		THIS CONDITION WAS DELETED IN MODIFICATION 1 OF THE CONSENT The Applicant must not construct the applicable wind turbines listed in Table 1 unless the Applicant has an agreement with the owner(s) of the relevant residence in regard to the visual impacts associated with the development, and the Applicant has advised the Department in writing of the terms of this agreement.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • As per the Modification 1 dated 21 April 2022, the CoA B1 was deleted from the consent. 	NT	As per the Modification 1 dated 21 April 2022, the CoA B1 was deleted from the consent.
VISUAL					
B2		<p>For a period of 5 years from the commencement of construction, the owner of any non-associated residence within 5 km of any turbine identified in the Final Layout Plan may ask the Applicant to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Applicant must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the wind turbines from the residence and its curtilage, and commensurate with the level of visual impact on the residence.</p> <p>All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.</p> <p>If the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p> <p>"Notes: <ul style="list-style-type: none"> • To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage. • The identification of appropriate visual impact mitigation measures will be more effective following the construction of the wind turbines. While owners may ask for the implementation of visual impact mitigation measures shortly after the commencement of construction, it is recommended owners consider whether there is benefit in delaying such a request until the relevant wind turbines are visible from their residence or its curtilage." </p>	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • 31/3/2025: Commencement of construction. 5 year period ends 31/3/2030 	C	<p>The Lead Auditor has sighted a notification letter from the Proponent to DPHI dated 28 March 2025 advising DPHI of construction commencement date to be 31 March 2025 in accordance with CoA B2 available on Major Projects website, and a letter from DPHI to the Proponent dated 1 April 2025 confirming the commencement date of construction to be 31 March 2025.</p> <p>During the site inspection, no WTG construction was evident.</p>
B3		<p>The Applicant must:</p> <p>a take all reasonable steps to minimise the off-site visual impacts of the development;</p> <p>b ensure the wind turbines are: <ul style="list-style-type: none"> • painted off white/grey, unless otherwise agreed by the Planning Secretary; and • finished with a surface treatment that minimises the potential for glare </p> <p>c ensure the visual appearance of all ancillary infrastructure (including paint colours, specifications and screening) blends in as far as possible with the surrounding landscape; and</p> <p>d not mount any advertising signs or logos on wind turbines or ancillary infrastructure (except where required for safety or emergency purposes).</p>	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Construction contract specifies off white/grey in accordance with this condition. No WTGs are in place yet. • All ancillary infrastructure including site offices was observed to be coloured off-white 	NT	<p>During the site inspection, it was evident that no WTGs are in place yet. Non-blade WTG parts were delivered to site in late April 2026 which haven't been constructed yet.</p> <p>Site offices were observed during the site inspection. Site safety and communications (radio channels) signage was in place. No other advertising or signage was observed during the audit site inspection on 13/05/2026.</p>

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B4		The Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Wind turbine construction has not commenced as of 13/05/2026. <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • Obstacle lighting review and risk assessment prepared by Aviation Projects. Report was submitted to CASA on 8/05/2023 for further consultation on the need for aviation lighting. Meeting requested. • 23/05/2023: CASA have provided comments, advising that they still recommend aviation lighting for UWF. • 13/06/2023: Aviation lighting plan (v2) developed by Aviation Projects. • 16/06/2023: Lighting Plan (v2) submitted to CASA for review. • 20/06/2023: CASA approve/accept the aviation lighting plan (v2). • 17/04/2023: Requirement for aviation lighting is confirmed, per the note above in B4b. • SQE are investigating options to minimise the visual impacts of any aviation lighting. • 17/04/2023: Pending outcomes of consultation with CASA. • 20/06/2023: CASA approve/accept the aviation lighting plan (v2). 	NT	<p>Wind turbine construction has not commenced as of 13/05/2026. The Lead Auditor has sighted the below documents in relation to CoA B4:</p> <ul style="list-style-type: none"> • 106901-01_Uungula_WF_Obstacle Lighting Risk Assessment_v1.1_230505 • 106901-01.1_Uungula_WF_Lighting Design Plan_v2.0_230613 • CASA Approval of the above documents dated 20 June 2023
	a	take all reasonable steps to minimise the off-site lighting impacts of the development;			
	b	ensure that any aviation hazard lighting complies with CASA's recommendations;			
	c	<p>minimise the visual impacts of any aviation lighting by implementing measures including as appropriate in the circumstances:</p> <ul style="list-style-type: none"> • partial shielding of lights; • operating the lights only at night or during times of reduced visibility; and • turning the lights on and off simultaneously; and 			
	d	<p>ensure that all external lighting associated with the development (apart from any aviation hazard lighting):</p> <ul style="list-style-type: none"> • is installed as low intensity lighting (except where required for safety or emergency purposes); • does not shine above the horizontal; • uses best management practice for bat deterrence; and • complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 			
	If there is a dispute about the need for aviation hazard lighting under B4(b), including which turbines are to be lit, then either party may refer the matter to the Planning Secretary for resolution.				
B5		The Applicant must ensure that shadow flicker associated with wind turbines does not exceed 30 hours per annum at any non-associated residence.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • Wind turbine construction has not commenced as of 13/05/2026. <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • 14/10/2022: Shadow Flicker Assessment prepared based on Rev 9.1 layout. Confirms shadow flicker exceeds 30 hrs/year at two receivers: Alma East (WUU 012) - estimated 112:12 hr/year Kulpana (Holland) (UUN005) - estimated 174:50 hr/yr. • 18/04/2023: Updated Shadow Flicker assessment prepared based on Rev 11 layout. Confirms shadow flicker exceeds 30 hrs/year at two receivers: Alma East (WUU012) - estimated 38:14 h/year. Kulpana (Holland) (UUN005) - estimated 174.5 h/year. 	C	<p>Wind turbine construction has not commenced as of 13/05/2026. The Lead Auditor has sighted the below documents in relation to CoA B5. The Lead Auditor has sighted the following documents:</p> <ul style="list-style-type: none"> • Shadow Flicker Assessment prepared based on Rev 9.1 layout • Shadow Flicker assessment prepared based on Rev 11 layout.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
NOISE AND VIBRATION					
B6	a	Road upgrades, construction, demolition, upgrading or decommissioning activities (excluding blasting) may only be undertaken between: 7 am to 6 pm Monday to Friday;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 11/03/2024: -Current Road Upgrade works are compliant with this condition. 4/9/2024 - An OOH work request was submitted to DPHI to allow works along Twelve Mile Road to be conducted on Saturdays and Sundays 20/9/2024: an RFI was received asking for clarification around the timing of these works 23/9/2024: a response was resubmitted to DPHI 7/11/2024: Approval received for Ilgingery Road and Twelve Mile Road works. 	C	There were previous OOHW undertaken as per the below DPHI approval and in accordance with the Project EPL: <ul style="list-style-type: none"> 2064-OOWWA-0013 - TMR Causeway repair dated 25/11/2025 Mod-3 was approved for minor additional road upgrades on 4/09/2025 - Twelve Mile Road/Goolma Rd intersection is 70% complete. Mitchell Hwy/Goolma Rd intersection upgrade is yet to commence. OOHW undertaken for Twelve Mile Rd/Goolma Rd intersection upgrade and noise monitoring was undertaken by Nacap. The Lead Auditor has sighted the noise monitoring records noting no exceedance at the nearest sensitive receivers.
	b	8 am to 1 pm Saturdays; and			
	c	at no time on Sundays and NSW public holidays: unless the Planning Secretary agrees otherwise.			
B7	a	The following activities may be carried out outside the hours specified in condition B6 above: activities that are inaudible at non-associated residences;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 11/12/2024: OOHW along Goolma Road for water and telecommunication relocations on the 12/12/2024 and 13/12/2024, as requested by the Correctional Centres. No emergency activities undertaken outside of the hours specified. Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 DPHI approval of the Out of Hours Request for the Twelve Mile Road 	C	Mod-3 was approved for minor additional road upgrades on 4/09/2025 - Twelve Mile Road/Goolma Rd intersection is 70% complete. Mitchell Hwy/Goolma Rd intersection upgrade is yet to commence. OOHW undertaken for Twelve Mile Rd/Goolma Rd intersection upgrade and noise monitoring was undertaken by Nacap. The Lead Auditor has sighted the noise monitoring records noting no exceedance at the nearest sensitive receivers.
	b	the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or			
	c	emergency work to avoid the loss of life, property or to prevent material harm to the environment.			
B8		The Applicant must take all reasonable steps to minimise the construction or decommissioning noise of the development, including any associated traffic noise.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 7/11/2024: An OOH approval received for Twelve Mile Road and Ilgingery Road upgrade works. 22/01/2025: the Construction Contractor have a CNMP to manage and mitigate construction noise 	C	There were previous OOHW undertaken as per the below DPHI approval and in accordance with the Project EPL: <ul style="list-style-type: none"> Out of Hours Work Notification - Uungula Wind Farm – Twelve Mile Road and Ilgingery Road Upgrades - letter dated 22/11/2024 DPHI approval of the Out of Hours Request for the Ilgingery Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 6/11/2024 DPHI approval of the Out of Hours Request for the Twelve Mile Road Upgrade as part of Uungula Wind Farm (SSD-6687) - dated 7/11/2024 Mod-3 was approved for minor additional road upgrades on 4/09/2025 - Twelve Mile Road/Goolma Rd intersection is 70% complete. Mitchell Hwy/Goolma Rd intersection upgrade is yet to commence. OOHW undertaken for Twelve Mile Rd/Goolma Rd intersection upgrade and noise monitoring was undertaken by Nacap. The Lead Auditor has sighted the noise monitoring records noting no exceedance at the nearest sensitive receivers.
					No non-compliance was raised against B8 as per the audit findings and documentation review.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B9		The Applicant must ensure that the noise generated by any construction or decommissioning activities is managed in accordance with the requirements outlined in the Interim Construction Noise Guideline (DECC, 2009)	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 22/01/2025: the Construction Contractor has a CEMP to manage and mitigate construction noise 29/01/2025: Notification made to DPHI of non compliance with this condition. OOHW along Twelve Mile Road did not monitor noise in compliance with ICNG 	C	<ul style="list-style-type: none"> The Proponent identified a non-compliance outside the audit period in relation to CoA B9 on 28/01/2025 regarding the Construction Contractor not undertaking noise monitoring in accordance with ICNG. Non-compliance was reported to DPHI on 29/01/2025 and DPHI response to the Proponent via a letter dated 10 April 2025 was sighted by the Lead Auditor. CEMP v2, dated 30/05/2025 (the Construction Contractor CEMP - and subplans compliance - Twelve Mile Rd pre-construction work - UWF-the Construction Contractor-EHS-PLN-006 minor update was undertaken No non-compliances were raised during the audit period regarding noise.
B10		Blasting may only be carried out on site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> Blasting activities undertaken on 6/6/2025 in accordance with B10. Noise monitoring undertaken. 	C	The Lead Auditor sighted Drill and Blast Management Plan dated 23/03/2025. The Proponent and construction contractor confirmed during audit interviews that blasting occurred on 13/10/2025. Noise monitoring records were sighted by the lead auditor.
B11		The Applicant must ensure that any blasting carried out on site does not exceed the criteria in Table 2. [Note, incorrect reference to 'Table 2']	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <ul style="list-style-type: none"> Blasting activities undertaken on 6/6/2025 in accordance with B10. Noise monitoring undertaken. 	C	The Proponent and construction contractor confirmed during audit interviews that no blasting works undertaken in the audit period.
Road Upgrades - Vibration Limits					
B11A		During road upgrades, the Applicant must comply with the requirements of the Construction Noise and Vibration Guideline (Roads) (TfNSW, 2024) including the minimum working distances, unless the Applicant has an agreement with the relevant owner/s of the buildings to work within these distances.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 	C	The Proponent and construction contractor confirmed during audit interviews that the requirements of the Construction Noise and Vibration Guidelines (Roads) (TfNSW, 2024) were complied with. As reported by the Proponent, no damage was recorded during the road upgrade works.
B12		<p>The Applicant must ensure that the noise generated by the operation of wind turbines does not exceed the higher of 35 dB(A) or the existing background noise level (LA90 (10-minute)) plus 5 dB(A) for each integer wind speed, measured at hub height, from cut-in to rated turbine generator power, at any non-associated residence.</p> <p>Noise generated by the operation of the wind turbines is to be measured in accordance with the relevant requirements of the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version). The noise generated by the operation of the wind turbines must also be adjusted for tonality and low frequency noise in accordance with the Department's Wind Energy: Noise Assessment Bulletin (2016) (or its latest version).</p> <p>However, these criteria do not apply if the Applicant has an agreement with the relevant owner/s of these residences to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 WTGs not constructed yet. 	NT	Operations have not commenced yet. Construction phase commenced on 31 March 2025 and is ongoing.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B13		The noise generated by the operation of ancillary infrastructure must not exceed 35 dB(A) LAeq(15 minute) at any non-associated residence. Noise generated by the operation of ancillary infrastructure is to be measured in accordance with the relevant requirements of the NSW Noise Policy for Industry (2017) (or its equivalent).	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> Current ancillary infrastructure built on site includes site offices and access tracks. Noise monitoring records including operation of ancillary infrastructure dated 8/6/2025 	C	The Lead Auditor made a visual observation regarding the current ancillary infrastructure on site which included site offices and access tracks. The Lead Auditor sighted noise monitoring records in relation to CoA B13, no exceedance was noted with the noise management criteria.
B14	a	Within 6 months of the commencement of operations (or the commencement of operation of a stage, if the development is to be staged), the Applicant must: undertake noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Operation not commenced yet. Monitoring report preparation requirement is not triggered. 	NT	Operations not commenced yet therefore monitoring report requirement is not triggered.
	b	submit a copy of the monitoring results to the Department and the EPA.			
B15		The Applicant must undertake further noise monitoring of the development if required by the Planning Secretary.			
AIR					
B16		The Applicant must take all reasonable steps to:	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Controls in place to minimise dust generation from the construction activities. Complaints Register June 2025 	C	The Lead Auditor observed measures in place to control dust including sealed roads, sealed stockpiles and water cart presence on site during site inspection on 13/05/2026 - refer examples of photographic evidence in the audit report. The Lead Auditor has sighted the Complaints Register as of May 2026 which included dust complaints and management measures undertaken to address the complaints by the Proponent, refer section 3.6.4 of the Audit Report.
	a	minimise the off-site dust, fume and blast emissions of the development;			
	b	minimise the surface disturbance of the site.			
SOIL AND WATER					
B17		The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Water permits in place. 	C	The Lead Auditor has sighted water access permits during the interviews with the auditees on 13/05/2026. in relation to CoA B17. The Audit has reviewed the works in accordance with the consent conditions B17 to B19. The relevant documents sighted including: <ul style="list-style-type: none"> Construction Environmental Management Plan Rev 02 dated 30/05/2025 Erosion and sediment control plans prepared and implemented by the construction contractor as evident during the site inspection on 13/05/2026 Water access licences (dated 05/06/2008, 1/12/2020, 10/09/2014, which were outside the audit period) Water meter records (dated January to March 2026) Water supply work and water use approval dated 01/07/2004 and expiry 28/03/2028 (outside the audit period) Pre and post rain inspection records prepared by the construction contractor (dated 15/04/2026)
		<i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</i>			
B18		Unless an EPL authorises otherwise, the Applicant must comply with Section 120 of the POEO Act. Note: Section 120 of the POEO Act makes it an offence to pollute any waters.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 29/05/2024: Environmental Protection Licence (EPL) 21862 obtained and active for the site 	C	The Lead Auditor has sighted the Project EPL 21862 and EPL Annual Monitoring Report 2025.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B19		The Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • 20/9/2024: All sections of road upgrades have had a Certified Professional of Erosion and Sediment Control (CPESC) endorsed Erosion and Sediment Control (ESC) Plan. • 22/01/2025: Contractors have CEMP detailing the Soil and Water Management Measures • 20/9/2024: All sections of road upgrades have had a CPESC endorsed ESC Plan. • 29/10/2024: culverts and road drainage along road upgrades are built in accordance with the relevant guidelines. • 29/10/2024: Spills have been cleaned up and Recorded in Archer 	C	The Lead Auditor has sighted approved CEMP which details soil and water measures and Erosion and Sediment Controls being implemented during site inspection on 13/05/2026, refer example photographs in Appendix E. Records of spill management have been sighted during the site inspection and documentation review.
	a	minimise erosion and control sediment generation;			
	b	ensure the wind turbine pads, ancillary infrastructure, access roads and any other land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater – Soils and Construction Volume 2C Unsealed Roads (DECC, 2008), or their latest versions;			
	c	ensure all waterway crossings are constructed in accordance with the Water Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), unless the Water Group agrees otherwise;			
	d	ensure the concrete batching plants and substation are suitably bunded; and			
e	minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.				
BIODIVERSITY					
B20		The Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • 26/08/2022: email and spreadsheet with computations of vegetation clearing for Twelve mile road (Biodiversity Conservation (BC) Act & Environment Protection and Biodiversity Conservation (EPBC) Act Threatened Environmental Communities (TECs) and threatened species). • 17/04/2023: Contract schedule 21 contains calculations of vegetation clearing for whole of development. • Max impact to BC Act listed vegetation = 19.94 ha. • Max impact to EPBC Act listed vegetation = 10.27 ha. • Clearing Impacts to be tracked through construction. • 28/10/2024: Updated impacts based of last Veg Intersects provided to BCS (14 June 2024) • Max impact to BC Act listed vegetation = 20.57 ha. • Max impact to EPBC Act listed vegetation = 10.9 ha. • Clearing Impacts to be tracked through construction. 	C	The Lead Auditor has sighted document titled 'SQE UWF Internal Audit Report dated October 2024' in relation to CoA B20 detailing the updated impacts based on the last Vegetation Intersects provided to on 14 June 2024, include a maximum impact to BC Act listed vegetation = 20.57 ha and maximum impact to EPBC Act listed vegetation = 10.9 ha. Clearing Impacts are currently being tracked throughout construction period as sighted within the following documents: <ul style="list-style-type: none"> • Environmental Management Strategy EMS v6, dated 17/04/2026 • Biodiversity Management Plan v5 dated 31/08/2023, approved by DPHI dated 22/09/2023 • Bird and Bat Adaptive Management Plan v6a, dated 22/01/2024, approved by DPHI dated 22/02/2024 • Pre-clearance checklist dated 29/05/2025 for Civil Area 2 prepared by the construction contractor • Pre-construction commencement checklist (hold point release) dated 29/04/2025 prepared and released by the Construction Contractor • Updated revised offset liability request was made by the proponent to DPHI on 31/03/2026 and was accepted by DCCEEW CPHR on 1/05/2026 • Biodiversity Conservation Trust - Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation dated 20/12/2024 • UWF-NACAP-CIV-PLN-0027_7 Clearing and Measurement Plan rev 7 dated 18/03/2025 • CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006
	a	ensure that no more than: <ul style="list-style-type: none"> • 29-28.73 hectares (ha) of BC Act listed White-Box-Yellow Box-Blakely's Red Gum Woodland CEEC; • 14-15 13.88 ha of EPBC Act listed White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland CEEC; is cleared for the development; and 			
b	minimise: <ul style="list-style-type: none"> • the impacts of the development on hollow-bearing trees; • the impacts of the development on threatened bird and bat populations; and • the clearing of native vegetation and key habitat. 				

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B21		Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • The updated baseline mapping was approved by the Planning Secretary in a letter dated 23/09/2021. There were no changes to the baseline vegetation mapping. • The approved Baseline Vegetation Mapping file is "GDA2020_UWF_RegionalVegMapping_v2". • Interim offset liabilities have been calculated based on the EIS Disturbance footprint. The liabilities will be further refined once the final disturbance footprint is locked in. • 19/05/2023: Email sent to BCS (David Geering) outlining steps taken to date to calculate the final biodiversity offset credit liability for the development. Refer to email on file and attachments provided in email. • 15/06/2023: A letter was received from BCS noting that "BCS is satisfied with the approach to recalculating the offset requirements for Uungula Wind Farm is sound". • Liability not yet approved by the NSW Planning Secretary. • 25/6/2024: Updated clearing calculation (revised disturbance footprint) spreadsheet was sent to BCS via email for acceptance. • 04/07/2024: Revised Disturbance Footprint shapefiles were provided to BCS. • 10/01/2025: Statement of reasonable equivalence received • 13/1/2025: Submitted offset calculations, BCS consultation and Statement of Assessment of Reasonable Equivalence (SARE) to Department • 17/01/2025: Secretary Approval received for the calculations of offset credit liability 	C	The updated baseline mapping was approved by the Planning Secretary in a letter dated 23/09/2021. There were no changes to the baseline vegetation mapping. The approved Baseline Vegetation Mapping file was provided to the auditor during the site inspection "GDA2020_UWF_RegionalVegMapping_v2". The Lead Auditor has sighted the documentation related to the Approval of the calculations of offset credit liability dated 17/01/2025.
	a	update the baseline mapping of the vegetation and key habitat within the development corridor;			
	b	calculate the biodiversity offset credit liabilities for the development in accordance with the Framework for Biodiversity Assessment under the NSW Biodiversity Offset Policy for Major Projects, in consultation with CPHR, and to the satisfaction of the Planning Secretary.			
B22		Unless the Planning Secretary agrees otherwise, prior to the commencement of construction, the Applicant must retire the biodiversity credits. The retirement of the credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects, and can be achieved by:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • Credit Option Deed is in place to provide part of the credit liability. • Remaining credits to be obtained via payment into the BCF (below). • All credits have been retired/ payments made into the Fund according to the SARE approved in B21. • 'Making payments into an offset fund that has been established by the NSW Government' forms part of the intended offset strategy. • 'Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme' is not proposed to form part of the offset strategy. 	C	The Lead Auditor has sighted documentation related to Biodiversity Offset Credit Liability dated 17/01/2025. On 31/03/2026, UWF sought the Planning Secretary's agreement to revise the biodiversity offset credit liability for the Project and to retire additional biodiversity offset credits, due to increased vegetation clearing needs. UWF proposed a "Revised Offset Footprint" reflecting micro-siting and additional clearing requirements and which has raised native vegetation impacts to 431.64 ha (about a 7% increase on the Approved Offset Footprint). DPHI approved the revised offset footprint on 01/05/2026.
	a	acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016;			
	b	making payments into an offset fund that has been established by the NSW Government; or			
	c	funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.			
		<i>Note: Following repeal of the TSC Act on 25 August 2017, credits created under that Act are taken to be 'biodiversity credits' under the Biodiversity Conservation Act 2016, in accordance with clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</i>			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B23		Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 23/11/2022: The Biodiversity Management Plan (BMP) (version 001) was submitted to the Planning Secretary for approval. • 17/04/2023: Comments were received from DPE in Feb 2023 and currently being addressed in BMP v002. • 31/05/2023: BMP v002 submitted. • 9/06/2023: Comments received from DPE on BMP v002. • 15/06/2023: BMP v003 submitted. • 24/07/2023: BMP v004 submitted. • 31/08/2023: BMP v005 submitted. • 22/09/2023: BMP v005 approved by Planning Secretary. 	C	The Lead Auditor has sighted the approved Biodiversity Management Plan v005 and its implementation during the site inspection.
	a	be prepared in consultation with CPHR; and include: <ul style="list-style-type: none"> • description of the measures that would be implemented for: <ul style="list-style-type: none"> - minimising the amount of native vegetation clearing within the approved development footprint; - minimising the loss of key fauna habitat, including tree hollows; - minimising the impacts on fauna on site, including undertaking pre-clearance surveys; - minimising the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; - rehabilitating and revegetating temporary disturbance areas; - protecting native vegetation and key fauna habitat outside the approved disturbance area; b <ul style="list-style-type: none"> - maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site; - collecting and propagating seed (where relevant); - controlling weeds and feral pests; - controlling erosion; and - bushfire management; • a detailed program to monitor and report on the effectiveness of these measures. Following the Planning Secretary's approval, the Applicant must implement the Biodiversity Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B24		Prior to the commissioning of any wind turbines, the Applicant must prepare a Bird and Bat Adaptive Management Plan for the development in consultation with CPHR, and to the satisfaction of the Planning Secretary. This plan must include:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 11/04/2023: BBAMP Draft v3 was submitted to BCS for consultation. • 26/04/2023: BCS provided feedback. • 20/09/2023: BBAMP Draft v5 submitted to BCS for review. • 13/10/2023: BCS provided a letter stating that the BCS "are generally satisfied that the document is adequate". • 26/10/2023: The two matters are being clarified via a minor update to the BBAMP. After this is complete, the BBAMP will be submitted to the Planning Secretary for approval. • 30/10/2023: BBAMP v6 emailed to BCS for approval. • 30/10/2023: BCS issued a letter approving BBAMP v6. • 31/10/2023: BBAMP v6 submitted to DPE via Major Project Portal. • 22/02/2024: BBAMP V6a Approved by DPE 	C	The Lead Auditor has sighted approved Bird and Bat Adaptive Management Plan. WTG commissioning requirements haven't been triggered yet.
	a	at least 12 months' worth of baseline data on threatened and 'at risk' bird and bat species and populations in the locality that could be affected by the development;			
	b	a detailed description of the measures that would be implemented on site for minimising bird and bat strike during operation of the development, including: <ul style="list-style-type: none"> • minimising the availability of raptor perches on wind turbines; • prompt carcass removal; • controlling pests; and • using best practice methods for bat deterrence, including managing potential lighting impacts; 			
	c	trigger levels for further investigation of the potential impacts of the project on particular bird or bat species or populations;			
	d	an adaptive management program that would be implemented if the development is having an adverse impact on a particular threatened or 'at risk' bird and/or bat species or populations; including the implementation of measures to: <ul style="list-style-type: none"> • reduce the mortality of those species or populations (including detailed consideration of favourable eucalyptus flowering events); or • enhance and propagate those species 			
	e	a detailed program to monitor and report on: <ul style="list-style-type: none"> • the effectiveness of these measures; and • any bird and bat strikes on site; 			
	f	provisions for a copy of the all raw data collected as part of the monitoring program to be submitted to CPHR and the Planning Secretary. Following the Planning Secretary's approval, the Applicant must implement the Bird and Bat Adaptive Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
HERITAGE					
B25		<p>The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint.</p> <p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.</p>	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • HMP details the measures to ensure no direct or indirect impacts to those Aboriginal Heritage items. • A salvage program is described in Section 3.2 of the HMP. • 16/02/24: A heritage salvage program current underway, with a planned completion date of 31/03/24 • 24/01/2025: Site Salvage Program Finished. Final Salvage report received. 	C	<p>The Lead Auditor has sighted approved Heritage Management Plan Rev005 being implemented for the development. Salvage related documents were sighted during the inspection and during audit documentation review. No issues were raised during this audit (IA#3).</p> <p>The final Salvage report was provided to the Proponent by Ozark Environment and Heritage (dated 24/01/2025). There was no evidence available during the audit regarding submission of the Final Salvage Report to relevant agencies and the RAPs. An Observation was raised during IA#1 and since has been closed out by the proponent via response to IA#1.</p> <p>ASIRFs were included in the Final Salvage Report however there was no evidence available regarding submission of ASIRFs to Heritage NSW. An Observation was raised during IA#1 and since has been closed out by the proponent via response to IA#1.</p>
		<p><i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 6.</i></p>			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B26		Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • Heritage Management Plan dated 04/07/2022 (v004) was approved by the DPPI on 02/08/2022. Refer to plan and approval letter on file. • 06/09/2024: HMP Rev005 Approved by the Planning Secretary • 28/6/2021 - Request to DPIE seeking approval of NSW Archaeology to prepare HMP. • 5/07/2021 - DPIE letter approves NSW Archaeology to prepare HMP. • Refer to the Consultation Log, and the HMP (Section 1.2, Appendix B) for consultation details. 	C	The Lead Auditor has sighted approved Heritage Management Plan Rev005 being implemented for the development. Salvage related documents were sighted during the inspection and during documentation review.
	a	be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;			
	b	be prepared in consultation with Heritage NSW and Aboriginal stakeholders;			
	c	include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • protecting the Aboriginal items identified in Table 1 in Appendix 6, including fencing off the items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, and protecting any items located outside the approved development corridor; • minimising and managing the impacts of the development on Aboriginal heritage items within the development corridor, including: <ul style="list-style-type: none"> - undertaking test excavations and salvage (if required) at the landform units identified in Table 3 in Appendix 6, where impacts cannot be avoided; - a strategy for the long-term management of any Aboriginal and European heritage items or material collected during the test excavation or salvage works; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - Aboriginal heritage items outside the approved disturbance area are damaged; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; 			
d	a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.				

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
TRANSPORT					
B27		All over-dimensional associated with the development must travel to and from the site via Golden Highway, Saxa Road, Mitchell Highway, Goolma Road, Twelve Mile Road and the approved site access point off Twelve Mile Road, as identified in the 'Indicative OSOM Route' and 'Project Access Route' in the figure in Appendix 8, unless the Planning Secretary agrees otherwise.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 17/04/2023: No Over Size and Over Mass vehicles have travelled to the site to date. The approved TMP and the Contractor's plans reflect this requirement and provide measures, as sighted. 	C	The Lead Auditor has sighted the approved Traffic Management Plan and geofence GPS data in relation to travel routes used by the project vehicles in accordance with the CoA B27. The Lead Auditor has sighted the updated approved TMP rev07C dated 15/05/2026 including OSOM Management Plan Appendices A to E.
		Notes: <ul style="list-style-type: none"> The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over dimensional vehicles on the road network. To avoid any doubt, this consent does not allow the use of Twelve Mile Road east of the approved site access point off Twelve Mile Road for over-dimensional access unless the Planning Secretary agrees otherwise. 			
B28		All heavy and light vehicles associated with the development must travel to and from the site via Twelve Mile Road (west) and the approved site access point off Twelve Mile Road, as identified by the 'Project Access Route' in the figure in Appendix 8, unless the Planning Secretary agrees otherwise.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 29/10/21: DPHI approval granted for temporary use of alternate roads for pre construction activities. Letter dated 28/10/21. 29/04/2022: Extension request #1 submitted to DPIE 4/05/2022: DPHI issue a request for information (RFI) 10/5/2022: UWF provides response to RFI. 12/05/2022: Second RFI issued. 18/05/2022: RFI response provided. 20/06/2022: Approval granted by DPIE 24/06/2022: Extension request #2 submitted 06/07/2022: Approval granted by DPIE 18/01/2023: Extension request #3 submitted 29/03/2023: Approval granted by DPE 26/10/2023: No non-compliance with this condition to date. 24/11/2023: Extension request #4 submitted 01/12/2023: Approval granted by DPE 19/2/2024: Extension request #5 submitted 01/03/2024: Approval granted by DPE 29/05/2024: Extension request #6 submitted 06/06/2024: Approval granted by DPHI 19/11/2024: Extension request #7 submitted 20/12/2024: Approval granted by DPHI 	C	The Lead Auditor has sighted documentation related to the approval of temporary use of alternate roads for pre-construction activities, DPHI letters to the Proponent on various dates.
		Note: To avoid any doubt, this consent does not allow the use of Twelve Mile Road east of the approved site access point off Twelve Mile Road for heavy or light vehicle access, unless the Planning Secretary agrees otherwise.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B29	a	Uungula Road, Wuuluman Road and Ilgingery Road must only be used by over-dimensional, heavy and light vehicles at the following locations to allow access between portions of the site: the secondary intersection on Uungula Road. the crossing points of the two secondary intersections on Uungula Road;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 	C	The Lead Auditor has sighted documentation related to the approval of temporary use of alternate roads for pre-construction activities, DPHI letters to the Proponent on various dates.
	b	the four secondary intersections on Ilgingery Road; and			
	c	between secondary intersection (A) and secondary intersection (C) on Ilgingery Road. In addition, heavy vehicles and light vehicles may use Uungula Road, Wuuluman Road and Ilgingery Road for the purposes of upgrading the intersections in B29(a) and B29(b) above.			
B30		<p>Unless the Planning Secretary agrees otherwise, prior to commencing construction the Applicant must implement the road upgrades identified in Appendix 7, in accordance with the relevant standard and timing requirements in Appendix 7; and to the satisfaction of the relevant roads authority.</p> <p>If there is a dispute about the road upgrades to be implemented, or the implementation of these upgrades, then either party may refer the matter to the Planning Secretary for resolution.</p>	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> 17/04/2023: Road upgrades not yet implemented. Construction not commenced. 26/10/2023: SQE sought Planning Secretary Agreement to complete the Goolma Rd / Twelve Mile Road intersection upgrade after commencing the construction of the wind farm. 24/11/2023: DPE granted Approval with the following conditions <ul style="list-style-type: none"> - As long the new intersection is constructed and the old intersection is removed and closed prior to the route being used for OSOM; and - Subject to the TMP being updated in consultation with TfNSW and Council, approved and implemented to safely manage construction traffic: <ul style="list-style-type: none"> o prior to construction commencing (for construction stage prior to OSOM); and o further updated prior to SOM using the new intersection. 17/01/2025: SQE submitted a request to DPHI seeking Planning Secondary agreement to commence some Transgrid construction activities prior to completing the TMR upgrades. RFI's were received and responded to. 03/03/2025: DPHI granted an approval for particular Transgrid Construction works to commence prior to completing the Twelve Mile Road and site access road upgrades. Subject to Conditions. 24/03/2025: Dubbo Regional Council and TfNSW provided email with acceptance of Twelve mile road and site access point being implemented to their satisfaction. 	C	<p>The Lead Auditor has sighted the following approval documents in relation to CoA B30:</p> <ul style="list-style-type: none"> Completion of Goolma Road and Twelve Mile Road intersection upgrade after commencing the construction of the wind farm. Commencement of Transgrid construction activities prior to completing the Twelve Mile Road upgrades. DRC and TfNSW acceptance letters of Twelve Mile Road and site access point implementation

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B31		The Applicant must: undertake an independent dilapidation survey to assess the: <ul style="list-style-type: none"> existing condition of Twelve Mile Road on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29, prior to construction, upgrading or decommissioning works; and 	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> An External Pre-Construction Road Dilapidation report was prepared by iCubed in Nov 2022 covering the following roads: Twelve Mile Road, Wuuluman Rd, Uungula Rd, Ilgingery Rd. 17/05/2023: The pre-construction dilapidation survey report was submitted via the Major Project Portal. 14/06/2023: DPE provided letter approval of the Dilapidation Survey report. Repairing of roads was not triggered during the reporting period. 	C	The Lead Auditor has sighted pre-construction road dilapidation survey titled '19-142-UWF-External Road Dilapidation Report-V1.0', and the DPHI approval of the Dilapidation Survey Report dated 14/06/2023.
	a	<ul style="list-style-type: none"> condition of Twelve Mile Road on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29: <ul style="list-style-type: none"> within 1 month of the completion of any construction, upgrading or decommissioning works; on an annual basis during construction works; rehabilitate and/or make good any development-related damage 			
	b	repair Twelve Mile Road, on the transport route, and the sections of Uungula Road, Wuuluman Road and Ilgingery Road described in condition B29, if dilapidation surveys identify that the road has been damaged during construction, upgrading or decommissioning works;			
		in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary.			
B32		The Applicant must ensure any unformed Crown road reserves affected by the development are maintained for future use, unless otherwise agreed with the DPIE Crown Lands.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 17/04/2023: No Crown road reserves will be impacted. 	C	The Proponent confirmed to the Lead Auditor that no Crown road reserves will be impacted. The Lead Auditor has sighted the Final Layout Plan v3 which shows no Crown Land Road Reserves impacted.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B33	a	Prior to commencing road upgrades, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include: details of the transport route to be used for all development-related traffic;	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • Draft TMP was submitted to the Planning Secretary for approval on 27.04.2022. • The submission included a Consultation Log, indicating the consultation undertaken with DRC and TfNSW. The DRC and TfNSW comments are saved on file in B33. • 14/07/2022: After several RFI's, the TMP v003 was approved by the DPE - refer to letter dated 13.07.2022. • 22/08/2023 TMP v4 submitted to the TfNSW for consultation, including OSOM Management Plan updates 	C	The Lead Auditor has sighted the approved Traffic Management Plan and geofence GPS in relation to the CoA B27.
	b	details of the road upgrade works required by condition B30 of Schedule 2 of this consent;			
	c	details of the measures that would be implemented to: <ul style="list-style-type: none"> • minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> - details of the dilapidation surveys required by condition B31 of Schedule 2 of this consent; - temporary traffic controls, including detours and signage; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development-related traffic; - minimising potential cumulative traffic impacts with other State significant development projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; • minimise dirt tracked onto the public road network from development-related traffic; - details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; - encouraging car-pooling or ride sharing by employees; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; - ensuring loaded vehicles entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. • comply with the traffic conditions in this consent:			
	d	include a drivers code of conduct that addresses: <ul style="list-style-type: none"> • travelling speeds; • procedures to ensure that drivers to and from the development adhere to the designated over dimensional and heavy vehicle routes; • procedures to ensure that drivers to and from the development implement safe driving practices; and • include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct. Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
AVIATION					
B34		The Applicant must carry out the development in accordance with the National Airports Safeguarding Framework Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers, or its latest version, unless the Secretary agrees otherwise.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 17/04/2023: The development has been assessed in accordance with this requirement and will be carried out in accordance with this requirement. 13/05/2026 - Wind turbines have not been constructed yet. 	NT	No WTGs have been constructed as evident during the site inspection on 13/05/2026.
B35	a	Prior to the construction of any wind turbine or wind monitoring mast, the Applicant must provide the following information to CASA, Airservices Australia, and the RAAF (together the authorities): co-ordinates in latitude and longitude of each wind turbine and mast;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 13/05/2026: No masts or wind turbines constructed to date. 	N	No WTGs have been constructed as evident during the site inspection on 13/05/2026. The Lead Auditor noted a self-reported non-compliance against condition B35 with regards to notification requirements to CASA not being met. During the EMS audit completed on 31 March 2026, insufficient evidence was available to confirm that all required notifications had been provided to CASA, Airservices Australia and the RAAF prior to the construction of some meteorological monitoring masts, as required by Condition B35. Planned actions by SQE: <ul style="list-style-type: none"> Submit all outstanding notifications to CASA, Airservices Australia, and the RAAF for any meteorological monitoring masts where pre-construction notification requirements were not previously fulfilled, ensuring these are not already covered by post-construction notifications Conduct a detailed internal investigation to determine the root cause of the notification oversight. The investigation will review project records, communication logs, and compliance tracking systems to identify any gaps or process failures that led to the missed notifications. A comprehensive review of compliance across all relevant conditions will also be undertaken. Findings from the investigation will inform improvements to internal procedures and staff training, with the aim of preventing recurrence and strengthening future compliance efforts Continue to provide pre-construction notifications for all wind turbines and wind monitoring masts to CASA, Airservices Australia and the RAAF, in accordance with Condition B35.
	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.			
B36	a	Within 30 days of the practical completion of any wind turbine or mast, the Applicant must: provide confirmation to the authorities that the information that was previously provided remains accurate; or	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 13/05/2026: No masts or wind turbines constructed to date. 	NT	No WTGs have been constructed as evident during the site inspection on 13/05/2026.
	b	update the information previously provided.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
RADIO COMMUNICATIONS					
B37		If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following the disruption of the service unless the relevant service provider or user or Planning Secretary agrees otherwise. If there is a dispute about the mitigation measures to be implemented or the implementation of these mitigation measures, then either party may refer the matter to the Planning Secretary for resolution	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 13/05/2026: No masts or wind turbines constructed to date. 	NT	No WTGs have been constructed as evident during the site inspection on 13/05/2026.
HAZARDS					
B38	a	Prior to commencing construction of the battery storage facility, the Applicant must undertake a Final Hazard Analysis (FHA) for the battery storage facility in consultation with the Department and to the satisfaction of the Planning Secretary. The Final Hazard Analysis must: be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 – Hazard Analysis and Multi-Level Risk Assessment;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 13/05/2026: Battery not proposed for construction as yet. 	NT	No WTGs or BESS have been constructed as evident during the site inspection on 13/05/2026.
	b	include blade throw risks from wind turbines;			
	c	consider recent developments in research and standards for battery energy storage systems; and			
	d	describe the final design of the battery storage facility.			
B39	a	Prior to commencing construction of the battery storage facility, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must: be consistent with the: <ul style="list-style-type: none"> Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and 	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 13/05/2026: Battery not proposed for construction as yet. 	NT	Battery not proposed for construction as yet as evident during the site inspection on 13/05/2026.
	b	describe the final design of the battery storage facility. Following the Planning Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.			
B40	a	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: the requirements of all relevant Australian Standards; and	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 3/4/24: Temporary Site office constructed for Twelve Mile Road upgrade works. Chemical storage was inspected as part of a pre-construction site audit and found to be suitable. Only spray cans kept on site to-date. 20/6/25: Site compound has been relocated to 1360 Twelve Mile Road. New workshop and site laydown area being constructed. 	C	The Lead Auditor observed all dangerous goods and chemicals with appropriate bunds and spill kits were available during site inspection. Document titled 'Workshop Laydown Fuel Storage Site Layout' was sighted by the Lead Auditor.
	b	the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B41	a	The Applicant must: minimise the fire risks of the development, including managing vegetation fuel loads on-site;	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • Refer to the Emergency Plan (Condition B42 below)which was developed in consultation with the RFS. To be revisited again prior to commencing 'construction' on the wind farm site. • No fire in the vicinity to date 	C	The Lead Auditor has sighted the approved Emergency Plan in relation to B41. the Proponent confirmed that there has been no fire in the vicinity of the development till date.
	b	ensure that the development: <ul style="list-style-type: none"> • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road: 			
	c	develop procedures to manage potential fires on site, in consultation with the RFS;			
	d	assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and			
	e	notify the relevant local emergency management committee following construction of the development, and prior to commencing operations.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B42		Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, and provide a copy of the plan to the local Fire Control Centre. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry point at all times. The plan must:	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 02/08/2022: The Emergency Plan (EP) dated 22 June 2022, Version 1.0 was accepted by the Minister in a letter dated 02/08/2022. EP developed in consultation with the RFS. • 22/1/2025: EP updated and provided to RFS for consultation feedback. Awaiting response <ul style="list-style-type: none"> • Per the approved Emergency Plan - the battery forms a different stage of the development and therefore has not been addressed in the Plan. Refer also to Condition C3 regarding staging of the wind farm and battery facility. 	C	The Lead Auditor has sighted the approved Emergency Plan in relation to B41. the Proponent confirmed that the battery forms a different stage of the development and therefore has not been addressed in the Plan. As per the approved Environmental Management Strategy section 1.2 and a letter titled 'Staging of Strategies, Plans and Programs Approval' the BESS (stage 2) of the development has not commenced. Nacap have developed a Field Emergency Response Guide for the field crews. The Lead Auditor has sighted the document reference: 2064-HS-004-2 Rev 1.4 dated 11/11/2025.
	a	be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);			
	b	identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;			
	c	include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;			
	d	list works that should not be carried out during a total fire ban;			
	e	include availability of fire suppression equipment, access and water;			
	f	include procedures for the storage and maintenance of any flammable materials;			
	g	detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;			
	h	include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank;			
	i	include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations;			
	j	include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;			
	k	include bushfire emergency management planning;			
	l	include details of the how RFS would be notified, and procedures that would be implemented, in the event that: <ul style="list-style-type: none"> •there is a fire on-site or in the vicinity of the site; •there are any activities on site that would have the potential to ignite surrounding vegetation; or •there are any proposed activities to be carried out during a bushfire danger period; and 			
m	include details on how the battery storage facility and sub-systems can be safely isolated in an emergency; Following approval, the Applicant must implement the Emergency Plan.				
B43	a	The Applicant must: prepare a Safety Management System for the development in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management' prior to commissioning any wind turbines on site or the battery storage facility; and	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 B43a requirement not triggered therefore Safety Management System has not been prepared yet, but will be prepared prior to commissioning.	NT	The Proponent stated that the Safety Management System for the development will be prepared prior to commissioning of wind turbines on site.
	b	implement and, if necessary, update the system over the remaining life of the development.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
WASTE					
B44	a	The Applicant must: minimise the waste generated by the development;	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • CEMP including waste management being implemented for all activities on site by the Construction Contractor. 	C	The Lead Auditor has sighted the approved CEMP and subplans including waste management measures being implemented for all activities on site by the Construction Contractor.
	b	classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);			
	c	store and handle all waste generated on site in accordance with its classification;			
	d	not receive or dispose of any waste on site; and			
	e	remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.			
ACCOMMODATION AND EMPLOYMENT STRATEGY					
B45	a	Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy (AES) for the development in consultation with Council, and to the satisfaction of the Planning Secretary. This strategy must: propose measures to ensure there is sufficient accommodation for the workforce associated with the development;	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • AES was prepared in consultation with Dubbo Regional Council. • 31/03/2023: DRC approved the AES Rev C. • 03/04/2023: AEC Rev C submitted to the DPE along with the DRC consultation log & evidence. • 17/04/2023: Currently awaiting approval from DPE. • 15/06/2023: AES Approval letter received from DPE. • Refer to AES document. 	C	The Lead Auditor has sighted the approved Accommodation and Employment Strategy Rev 0 dated 9/06/2023 in relation to CoA B45.
	b	consider the cumulative impacts associated with other State significant development projects in the area;			
	c	investigate options for prioritising the employment of local workers for the construction and operation of the development, where feasible; and			
	d	include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction. Following the Planning Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.			
DECOMMISSIONING AND REHABILITATION					
B46		Within 18 months of the cessation of operations, unless the Planning Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3. [Note, incorrect reference to Table 3].	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 	NT	As evident on site during the site inspection, operations have not commenced yet.
B47	a	The Applicant must: rehabilitate all areas of the site not proposed for future disturbance progressively, that is, as soon as reasonably practicable following construction or decommissioning;	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> • Rehabilitation is not triggered yet. • 30/09/2024: Staging of Road upgrade works has factored in exposure and been timed to minimise as much as possible. • 30/09/2024: CPESC endorsed ERSED plans have been created and applied to road upgrade works, to minimise soil erosion. • Water carts are used to minimise dust generation. • Wind turbines have not been constructed yet • Operations have not commenced yet 	C	As evident on site during the site inspection, rehabilitation is not triggered, CPESC endorsed ERSED Plans were being implemented, water carts were in use for dust suppression, weed hygiene practices were implemented and operations have not commenced yet.
	b	minimise the total area exposed at any time; and			
	c	where it is not possible to carry out measures for permanent rehabilitation, employ interim rehabilitation strategies to minimise dust generation, soil erosion and weed incursion until such time that it is.			

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B48		Any individual wind turbines which cease operating for more than 12 consecutive months must be dismantled within 18 months after that 12 month period, unless the Planning Secretary agrees otherwise.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Operations have not commenced yet 	NT	As evident on site during the site inspection, operations have not commenced yet.
ENVIRONMENTAL MANAGEMENT					
C1	a	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: provide the strategic framework for environmental management of the development;	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <ul style="list-style-type: none"> 05/01/2023: The EMS (version 001) was submitted to the Planning Secretary for approval (PA-14). DPE provided comments in March 2023. 03/04/2023: A revised EMS (version 002) was submitted to DPE along with responses to comments. 17/04/2023: DPE approval pending. 1/06/2023: DPE provided comments on EMS v002. 8/06/2023: Updated EMS v003 submitted to DPE. 15/06/2023: DPE provided comments on EMS v003. 19/06/2023: EMS v004 submitted back to DPE for approval. 27/06/2023: EMS v004 was approved by the NSW Planning Secretary. Refer to approval letter on file. Refer to EMS, approved by Planning Secretary 27/06/2023. 	C	The Lead Auditor has sighted the approved EMS v004 in relation to the CoA C1.
	b	identify the statutory approvals that apply to the development;			
	c	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;			
	d	set out the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and 			
	e	include: <ul style="list-style-type: none"> (i) reference to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this consent. 			
		Following the Planning Secretary's approval, the Applicant must implement the Environmental Management Strategy.			
C2	a	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	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 17/04/2023: No upgrading or decommissioning has occurred. 	C	The Proponent has confirmed that there was no upgrading or decommissioning activities on site till date, Modification 1 and 2 were approved on 21/4/22 and 5/12/22, respectively. There was no revision to the approved plans required as a result of modifications.
	b	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: <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Modification 1 was approved on 21/04/2022. No management plans, strategies or programs had been approved at this time. Modification 2 was approved on 5/12/2022. Approved management plans HMP, TMP, ERP reviewed on 03/01/2023 in accordance with Condition C2. No revision to the plans is required. 		

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
C3	a	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);	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. • EMS v4, dated 19/06/2023, approved 27/06/2023 • BMP v5 dated 31/08/2023, approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, approved 06/09/2024 • TMP v4b, dated 22/08/2024, approved 7/11/2024 • All updates have been submitted via the Major Projects portal with consultation from the relevant agencies. 	C	<p>The Lead Auditor has sighted the following documents in accordance with CoA C3:</p> <ul style="list-style-type: none"> • EMS v4, dated 19/06/2023, initially approved 27/06/2023 • EMS v5, dated 17/03/2025 • EMS v6, dated 16/04/2026 • EMP v3, dated 10/04/2026 • BMP v5 dated 31/08/2023, initially approved 22/09/2023 • BBAMP v6a, dated 22/01/2024, approved 22/02/2024 • HMP v5 dated 19/07/2024, initially approved 06/09/2024 • TMP v007C dated 15/05/2026, initially approved 28/03/2025 • OSOM Management Plan Appendices A to E • PIRMP v1, dated 23/9/2024 • CEMP v2, dated 30/05/2025 UWF-NACAP-EHS-PLN-006 • CEMP v3, dated 13/11/2025 UWF-NACAP-EHS-PLN-006
	b	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			
	c	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).			
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.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. • This condition was not triggered for the reporting period 	NT	<p>CoA C4 has not been triggered.</p> <p>The Lead Auditor has sighted the following documents in accordance with CoA C4:</p> <ul style="list-style-type: none"> • As per the approved Environmental Management Strategy section 1.2 and a letter dated 15/03/2022 titled 'Staging of Strategies, Plans and Programs Approval' the BESS (stage 2) of the development has not commenced.
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.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery Energy Storage System (BESS). • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. 	C	<p>The Lead Auditor has sighted the following documents in accordance with CoA C5:</p> <ul style="list-style-type: none"> • DPHI letter dated 15/03/2022 of approval to submit the plans on a staged basis per the request.
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.	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 • 21/02/2022: Letter was submitted to the Secretary seeking agreement to submit strategies/ plans on a staged basis: Stage 1 = Wind farm , Stage 2 = Battery facility. • 15/03/2022: Secretary grants approval to submit the plans on a staged basis per the request. 	C	<p>The Lead Auditor has sighted the following documents in accordance with CoA C3:</p> <ul style="list-style-type: none"> • DPHI letter dated 15/03/2022 of approval to submit the plans on a staged basis per the request.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
NOTIFICATIONS					
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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 28/3/25: Commencement Date notified to DPHI as the 31 March 2025 via letter in the portal 	C	The Lead Auditor has sighted a letter of notification to DPHI regarding commencement of construction dated 28 March 2025 and DPHI's response to the Proponent via a letter dated 01/04/2025. Date of commencement listed in the letter was 31 March 2025.
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:	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> Final Layout Plan (v001) was submitted to the Department via the portal. The Final Layout Plan was revised (v002) in response to DPE comments. 	C	The Lead auditor has sighted the Final Layout Plan Rev 2A dated 7/11/2023.
	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.			
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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Operations not yet commenced 	NT	Operation not commenced yet.
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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Applicant is not aware of any reportable incident that has occurred on the site to date. 	NT	The Lead Auditor has sighted Monthly Reports between December 2025 and March 2026 which details 10 minor incidents occurred on site in the audit period. As evident in the project monthly reports, the Proponent reported that there were no reportable incidents occurred on site.
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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 29/01/2025: Notification of non compliance submitted via Portal against condition B9 	C	The Lead Auditor sighted DPHI response to the Proponent's notification of non-compliance (raised outside the audit periods IA#1 and IA#2) against condition B9 via a letter dated 10/04/2025.
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.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Notification of non compliance submitted via Portal against conditions A2(b) and B35. 	C	The Lead Auditor sighted DPHI responses to the Proponent's notification of non-compliance within the audit period against conditions A2(b) and B35.
C13		A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Notification of non compliance submitted via Portal against conditions A2(b) and B35. 	NT	No notifiable incidents occurred till date. As sighted in the monthly reports, No notifiable incidents occurred till date. The Lead Auditor sighted DPHI responses to the Proponent's notification of non-compliance within the audit period against conditions A2(b) and B35.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
C14	a	Prior to the commencement of construction, the Applicant must notify the owners of: the land listed in Table 1 and Table 2 of the conditions of this consent of their rights under condition B1 and B2 of Schedule 2; and Note: Table 1 was deleted in Mod 1. Note: Table 2 related to blasting criteria, and had no relationship to visual mitigation or landowner rights.	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 Relevant documents as detailed below were discussed with the Proponent during the site inspection: <ul style="list-style-type: none"> 31/10/2023: Draft letter has been prepared - in Compliance Tracking folder 'C14 Landowner notification'. 22/1/2025: a) is an outdated reference from Mod 1 and is no longer relevant 04/03/2025: Letter sent to DPPI via Major Projects Planning portal, advising of the errors within Condition C14a. Confirmation of receipt was requested. 22/01/2025: Updated letter and recipients provided to team. 5/3/25: letters were emailed to non associated residences within 5 km. 	C	The Lead Auditor has sighted the evidence of consultation within the relevant management plans (further details are noted against each condition below): <ul style="list-style-type: none"> B21a - Baseline mapping. Consultation with BCS. B21b - Credit liabilities. Consultation with BCS. B23 - BMP. Consultation with BCS. B24 - BBAMP. Consultation with BCS. B26 - HMP. Consultation with Heritage NSW. B31 - Repair of damaged roads B33 - TMP. Consultation with DRC and TfNSW. B38 - Fire Hazard Analysis (battery) B41 - Procedures to manage potential fires. Consultation with RFS. B45 - Accommodation and Employment Strategy. DRC.
	b	any non-associated residence within 5 km of any approved wind turbine of their rights under condition B2 of Schedule 2.			
INDEPENDENT ENVIRONMENTAL AUDIT					
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	<ul style="list-style-type: none"> Auditee interviews and site inspection on 13/05/2026 2/12/2024: DPPI provided endorsement of HBI as independent Auditors for the Construction Audit. 16/10/2025: DPPI provided endorsement of HBI as independent Auditors for the Construction Audits and initial Operational Audit. 	C	The Independent Auditors have been approved by DPPI on 16/10/2025 for construction audits and initial operational audit.

Condition	Sub-condition ID	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
ACCESS TO INFORMATION					
C16		<p>The Applicant must: make the following information publicly available on its website as relevant to the stage of the development:</p> <p>(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</p>	<ul style="list-style-type: none"> • Auditee interviews and site inspection on 13/05/2026 <p>Relevant documents as detailed below were discussed with the Proponent during the site inspection:</p> <p>i) EIS - On the website. ii) Final layout plans - v002 published on 07/11/2023. iii) Current Statutory approvals - Consent Mod 1, Mod 2 and EPBC approval are on the website. iv) Approved Strategies, plans or programs: TMP v003 (& approval dated 13.07.2022). EMS v004, approved on 27/06/2023, published 29/06/2023. BMP v005, approved 22/09/2023, published 25/09/2023. AES v0, approved 14/06/2023, published 16/06/2023. BBAMP V6a, Approved 22/02/2024, published 26/02/2024 v) The proposed staging plans for the development: Approved staging march 2022. vi) Monitoring results - None yet available. vii) Complaints Register - On the Website. viii) Minutes of CCC meetings - On the website. ix) Annual Statement of Compliant with EPL - None yet available. x) Independent Environmental Audit - to be updated once final audit report is received. • 10/01/2025: Website audit completed showing compliance.</p> <p>xi) Other matters:</p>	C	<p>The Lead Auditor has sighted the relevant documents and the Proponent - UWF website 'https://www.squadronenergy.com/our-projects/Uungula-wind-farm'</p> <p>The following plans, strategies, approvals of the plans and other documents were sighted by the Lead Auditor on the SQE website:</p> <p>i) EIS - On the website. ii) Final layout plans - v002 published on 07/11/2023. No change since v002. iii) Current Statutory approvals - Consent Mod 1, Mod 2, Mod 3 and EPBC approval are on the website. iv) Approved Strategies, plans or programs: TMP v007c (and initial approval dated 13.07.2022). EMS v005, approved on 27/06/2023, published 29/06/2023. EMS v006, dated 16/04/2026 BMP v005, approved 22/09/2023, published 25/09/2023. AES v0, approved 14/06/2023, published 16/06/2023. BBAMP V6a, Approved 22/02/2024, published 26/02/2024 v) The proposed staging plans for the development: Approved staging March 2022 available on website. vi) Monitoring results - uploaded on the website vii) Complaints Register - uploaded on the website. viii) Minutes of CCC meetings - uploaded on the website. ix) Annual Statement of Compliant with EPL - 2025 available on website.. x) Independent Environmental Audit - Audits#1 and # Reports available on website. • 10/01/2025: the Proponent completed an internal website audit completed showing compliance.</p> <p>xi) Other matters: Previously uploaded documents: • 06/06/2023: Secretary requested the pre-construction Road Dilapidation survey be published online. The Lead Auditor sighted the records published on the website by the Proponent as per DPHI request. • 7/11/2024: Secretary requested the OOHW approvals for Ilgingery d and TMR works be published online. The Lead Auditor sighted the records published on the website by the Proponent as per DPHI request. • 10/01/2025: the Proponent completed internal audit of the website confirming compliance. The Lead Auditor sighted the records published on the website by the Proponent.</p>
	a	(xi) any other matter required by the Planning Secretary; and	<ul style="list-style-type: none"> • 06/06/2023: Secretary requested the pre-construction Road Dilapidation survey be published online. • 7/11/2024: Secretary requested the OOHW approvals for Ilgingery d and TMR works be published online. • 10/01/2025: the Proponent completed internal audit of the website confirming compliance 		
	b	keep this information up to date.			

APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS



Department of Planning, Housing and Infrastructure

NSW Planning ref: SSD-6687-PA-43

Vince Chaplin
Senior Environmental Advisor
Uungula Wind Farm Pty Ltd
16/10/2025

Sent via the Major Projects Portal only

**Subject: Uungula Wind Farm – Independent Environmental Audit # 2 auditor endorsement
October 2025**

Dear Mr Chaplin

Reference is made to your post approval matter, SSD-6687-PA-43, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct the first Independent Environmental Audit of the Uungula Wind Farm, submitted as required by Part C, Condition C15 of SSD-6687 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 10 October 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent. In accordance with Part C Condition C15 of the consent and the NSW Planning, Independent Audit Post Approval Requirements (2020), as nominee of the Planning Secretary, I endorse the following independent audit team from Healthy Buildings International Pty Ltd:

- Maulik Bapodara as Lead Auditor and
- Swathi Gowda as audit support

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Construction Audits – The above audit team is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au

1



Department of Planning, Housing and Infrastructure

- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely



Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary



APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS

Audit Plan

<p>Audit Site/Project: Uungula Wind Farm <u>Application Number:</u> SSD 6687 (as modified; the Approval) <u>Proponent:</u> Uungula Wind Farm Pty Ltd <u>Approval Authority:</u> A/Executive Director Energy, Industry and Compliance <u>Determination Date:</u> 7/5/2021 (Mod-1: 21/4/22, Mod-2: 2/12/22; Mod-3: 1/9/25)</p>	<p>Company <u>Client:</u> Uungula Wind Farm Pty Ltd Auditee/s or Project Team:</p> <ul style="list-style-type: none"> • Uungula Wind Farm Pty Ltd (the Proponent) • Nacap Pty Ltd • CPP • Transgrid • Downer
<p>Stage of works: This Audit Plan provides a summary of the proposed third Independent Audit scheduled to commence with a site inspection on 13 May 2026 and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.</p>	
<p>Key Auditee/s or Project Team Representatives and Contact Details:</p> <p>Uungula Wind Farm Pty Ltd:</p> <p>Vince Chaplin Senior Environmental Advisor 0417 495 589 vince.chaplin@aquadronenergy.com</p> <p>Dean Woods Senior Environmental Advisor Dean.Woods@squadronenergy.com</p> <p>Malcolm Moore Site Representative Malcolm.moore@squadronenergy.com</p> <p>Sanjay Goel Project Director Sanjay.Goel@squadronenergy.com</p> <p>Nacap Pty Ltd: Shaun Smith Lands Environment and Cultural Heritage Manager</p> <p>CPP: Jack Walsh jackwalsh@conpower.com.au</p> <p>Ben Bennett b.bennett@conpower.com.au</p> <p>Transgrid: Maki Okamura maki.okamura@transgrid.com.au</p> <p>Jose Silveira Do Nascimento (jnr) jose.silveiradonascimentojunior@transgrid.com.au</p> <p>David Gardner</p>	<p>Audit Identification: Independent Audit No. 3 – Uungula Wind Farm</p> <p>Audit Dates and Indicative Program:</p> <ul style="list-style-type: none"> • Day 1 – 13 May 2026 (Day) • Audit Program - Refer Appendix A



Audit Plan

david.gardner@transgrid.com.au Brad Parker bradley.parker@transgrid.com.au Downer: Brittany Goss Environment and Sustainability Advisor Brittany.goss@downergroup.com		
Proposed Audit Schedule		
Time	Audit Attendees	Scope (Conditions of Approval)
Opening Meeting: 08:30–08:45	All	Discuss the agenda of the audit, consultation feedback from DPPI and other stakeholders regarding IA#3
Site Inductions (as required) and Site Inspection 09:00 –11:00	Uungula Wind Farm Pty Ltd Nacap Pty Ltd including relevant Site Supervisor(s) for Site Inspection Areas	<ul style="list-style-type: none"> Site Inspection (key sites, site compounds, laydown areas) Uungula Wind Farm conditions of approval Parts A, B and C
Interviews / Verification of evidence: 11:00 –17:00 with Lunchbreak: 12:00 -12:30	Uungula Wind Farm Pty Ltd Nacap Pty Ltd CPP Divalls Transgrid/Downer	<ul style="list-style-type: none"> Consultation Scope (DPPI/DRC/TfNSW/NSW EPA/NSW DCCEEW CPHR/Heritage NSW) Part A (Administrative Conditions) Part B (Community Information and Reporting) Part C (Construction Environmental Management) An assessment of incidents, non-compliances and complaints that occurred or were made during the audit period
Lunchbreak: 12:00 -12:30		
Continue Interviews / Verification of evidence: 12:30– 16:30	Uungula Wind Farm Pty Ltd Nacap Pty Ltd, CPP, Divalls, Transgrid/Downer relevant personnel – such as Community Stakeholder and Engagement, Traffic, Spoil, Design, Plant and Property /Interface Management Teams	<ul style="list-style-type: none"> Consultation Scope (DPPI/DRC/TfNSW/NSW EPA/NSW DCCEEW CPHR/Heritage NSW) Part A (Administrative Conditions) Part B (Community Information and Reporting) Part C (Construction Environmental Management) An assessment of incidents, non-compliances and complaints that occurred or were made during the audit period Part E (Key Issues Conditions)
Day 1: Initial Closing Meeting: 16:30-17:00	All	<ul style="list-style-type: none"> Informal closing meeting to provide preliminary summary of the audit findings. A formal closing meeting will be held once all evidence has been reviewed – refer Appendix A.
Audit Team: <ul style="list-style-type: none"> Lead Auditor: Maulik Bapodara (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C - 462181) 		



Audit Plan

- **Support Auditor/Reviewer:** Swathi Gowda (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C - 442234)

Audit Objective:

This Independent Audit has been prepared to satisfy **Condition C15** of State Significant Development (SSD) 6687 of the Project planning approval and aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs).

Audit Reference Documents:

- *Independent Audit Post Approval Requirements [DPIE (now DPHI), 2020]*
- *ISO 14001: 2015 Environmental Management Systems*
- *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems*
- Evidence submitted for review during the audit

Audit Period: The temporal period covered by the audit is from the date of the last independent environmental audit (18 November 2025) to the date of the site inspection (13 May 2026).

Audit Scope: The audit will comprise four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified), Parts A, B, and C, Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
 - the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect);
 - a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
 - any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

During the consultation period, the Department provided the following feedback in relation to the audit scope:

- *“Ensure you assess compliance with all conditions of consent applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of consent, including management plans.*
- *Review the environmental performance of the development including; actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.*
- *A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate.*
- *Ensuring all notifications have been carried out for out of hours, incident/non-compliance reporting, commencement of construction/operation, plans etc.*
- *Ensuring all environmental controls have been installed, maintained, and are being used in a fit and proper manner.*
- *Erosion and sediment management and maintenance across the Project is being undertaken and adequate.*
- *Compliance with all commitments/actions/monitoring in all management plans, including evidence of the management plans being reviewed and revised as needed.*
- *Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20*



Audit Plan

- *Records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.*
- *Complaints are being recorded, investigated and dealt with in an appropriate and timely manner*
- *Review the project is managing and implementing the requirements for:*
 - *Traffic and Road impacts*
 - *Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts*
 - *Out of Hours impacts*
 - *Noise and Vibration impacts*
 - *Visual and Lighting impacts*
 - *Storage and Handling of Dangerous Goods*

In regards to consultation with other agencies, please consult with the following:

- *Local Council - Dubbo Regional Council*
- *Environment Protection Authority*
- *Transport for NSW*
- *NSW DCCEEW CPHR*
- *Heritage NSW*
- *CASA - Civil Aviation Safety Authority*

Consultation feedback from the other stakeholders includes the following:

TfNSW: Transport for NSW suggested the IEA scope includes the following:

- *Compliance with Instrument of Consent transport-related conditions*
- *Implementation and enforcement of shuttle bus arrangements*
- *Management of construction traffic volumes during AM and PM peak periods*
- *Any pre-construction minor works mitigation measures and associated Planning Secretary approvals*
- *Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)*
- *Commitments made within the Environmental Impact Statement (EIS)*
- *Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions*
- *Effectiveness of mitigation measures detailed within the TMP*
- *Alignment between assessed and actual traffic volumes and vehicle characteristics*
- *Suitability of existing intersection treatments under cumulative background and project traffic*
- *Ongoing appropriateness of approved OSOM routes for the configurations being utilised*
- *Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response*
- *Audit report outcomes and recommended actions relevant to the State road network*

NSW DCCEEW CPHR: The following feedback was received:

- *We note the comprehensive list of items you have highlighted for your audit. CPHR has no new issues to raise for this audit that we have not raised previously.*
- *Evaluation of compliance will be carried out in accordance with Sec 3.7 of the IAPARs and documented in an Audit Table, which will include the conditions of SSD 6687. The compliance status of each compliance requirement in the Audit Table will be determined using the relevant descriptors in Sec 3.8, Table 2 of the IAPARs. As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the Project.*

Heritage NSW:

- *Please include any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.*
- *It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.*

CASA:

- *One difference being with the NASF Guidelines being: International standards require 2,000 candela lighting intensity on the nacelle (also recommended in the NASF guideline) and 200 candela at the mid-point of the turbine mast. CASA recommends that 200 candela as a minimum intensity lighting on the nacelle would suffice*



Audit Plan

(due mainly to the lack of background lighting in the vicinity of the turbines).

- CASA has no other key issues it would like examined.

DRC:

Council provided the following feedback: Council officers have reviewed various aspects of the development, and it is only with regard to some roadworks that any issue is raised, as follows:

- Roadworks at the Goolma/Twelve Mile Road intersection appear to be complete, however this would require confirmation from TfNSW. As part of these works the original Twelve Mile Road section of the intersection has been permanently closed to the public and rehabilitation works are now complete. DRC had joint responsibility with TfNSW to ensure compliance with this condition.

The Audit Table maybe updated to incorporate Project-specific requirements where necessary.

Documentation and Records: The following list provides a high-level indication of documentation and records that may be requested for review prior to and during the audit (but not limited to):

- Project approval documentation including any ancillary facilities, minor ancillary facilities, Consistency Assessments
- Construction Monitoring Reports
- Construction Environmental Management Plan and associated sub-plans
- Relevant supporting correspondence from the Department, other agencies and stakeholders
- Erosion and Sediment Control Plans
- Out of Hours Works Applications and Permits
- Specialist Reports including (but not limited to):
 - Soil and Groundwater technical reports, including waste classification reports (and disposal records)
 - Heritage Assessments and clearance reports
 - Noise and Vibration Assessments and monitoring data
 - Water quality assessments and monitoring data
 - Ecological / Flora and Fauna / Tree Protection (Arborist) Reports
- Evidence of close-out of previous Environmental Independent Audit actions
- Any other applicable approvals, permits or Project-specific environmental requirements
- Evidence of submission of documents and records to agencies
- Internal Inspection Reports and Project Monthly Reports
- Complaints Registers and complaint response records
- Incident and Non-Compliance Registers/Reports, evidence of action close-out

Applicable Site Safety Rules/Inductions required:

Site Induction, any changes to the induction are to be advised by the auditees

PPE Requirements: As per IA#1

Any Special Conditions or Requirements: To be advised by the Auditees

Prepared By:

Maulik Bapodara, Lead Auditor
Healthy Buildings International Pty Ltd
30 March 2026



Audit Plan

Appendix A – Independent Audit Indicative Audit Program

Indicative Audit Schedule	
INDEPENDENT AUDIT - TASK/DETAILS	Uungula Wind Farm
STAKEHOLDER CONSULTATION	
DPHI scope consultation commencement	30/03/2026
Target DPHI consultation end date/DPHI scope consultation received	30/04/2026
Other stakeholder [NSW EPA/Councils (Dubbo Regional)] scope consultation on receipt of DPHI scope consultation	1-12/05/2026
Other stakeholder consultation period finishes	12/05/2026
AUDIT PLANNING/PRELIMINARY DOCUMENT REVIEW (AVAILABLE INFORMATION)	
Pre-audit planning	1/05/2026 – 12/05/2026
SITE VISIT/INTERVIEWS	
Opening Meeting, Site Inspection, Site Interviews and Verification of evidence	13/05/2026
Contingency day on-site for completion of Site Inspection, Interviews and Verification of evidence - to be determined further by Lead Auditor; and also dependent on scope consultation outcomes from DPHI and other stakeholders.	14/05/2026 (if required)
POST SITE VISIT VERIFICATION	
Follow up period for verification of evidence (desktop) - It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor/Auditor	14/05/2026 – 20/05/2026
Closing Meeting - Final	21/05/2026
DRAFT REPORTING	
Draft Consolidated Audit Report including Audit Table	22/05/2026
REVIEW PERIOD	
Auditee Review Period (Squadron Energy/Contractor): - Comments back within one week (One set of consolidated comments is requested from review of Draft Audit Report). - The Draft Audit Report may only be revised in instances where Auditors are satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place.	22/05/2026 – 29/05/2026
FINAL REPORTING	
Final Consolidated Audit Report issued to Squadron Energy	05/06/2026
Final Consolidated Audit Report – Squadron Energy to DPHI (must be submitted within 2 months of audit site inspection date in accordance with IAPAR section 4.5)	12/06/2026





HBI








Healthy Buildings International

Participants ✕




Invite someone or dial a number 🔍

📄 **Share invite**

∨ In this meeting (7) Mute all

-  Maulik Bapodara 🔇
-  Brittany Goss 🔇
-  Jose Silveira do Nascimento... 🔇
-  Sanjay Goel 🔊
-  Smith, Shaun 🔇
Organiser
-  Meeting space
-  **Dean Woods** 🔇 ⋮

∨ Others invited (3)

-  Candice Somerville 🔇
No response
-  Brenton Dennis 🔇
No response
-  Wunkie Wong 🔇





APPENDIX D – CONSULTATION RECORDS

Subject: FW: Third Independent Audit – SSD 6687 – Uungula Wind Farm Consultation
Date: Tuesday, 14 April 2026 at 10:28:09 Australian Eastern Standard Time
From: Jennifer Rowe
To: Maulik Bapodara
Attachments: image002.png, image003.png, img-716a3c06-db85-4638-b656-865635698966, img-f0511483-a754-48af-91f1-d75aa5f469e0, img-6063358f-3a8f-42da-af61-2cb9e2bbf270, DPHI_Consultation_UWF_SSD_6687_Letter.pdf

Hi Maulik

I have reviewed your email and attached letter seeking consultation on the upcoming Independent Environmental Audit (IEA) for the Uungula Wind Farm Project SSD 6687.

Whilst, the Department is satisfied with the proposed scope, the IEA is to address all conditions of Consent for the project and meet the requirements of the Independent Audit Post Approval Requirements (DPIE, 2020).

Please ensure you consult with the following agencies:

- Local Council – Dubbo Regional Council
- Environment Protection Authority
- Transport for NSW
- NSW DCCEEW CPHR
- Heritage NSW
- CASA - Civil Aviation Safety Authority

As part of your scope can you also address/review the following aspects in detail:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
 - Out of Hours impacts
 - Noise and Vibration impacts
 - Visual and Lighting impacts
 - Storage and Handling of Dangerous Goods

1 of 4



- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.



This email is to be appended to the Audit Report.

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

Lastly, it is the expectation that the lead auditor attends audit site inspections and interviews. The Independent Audit Post Approval Requirements 2026 (IA PAR) requires the proponent to provide the auditor with reasonable access to all requested development areas and activities; thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).





HBI

Healthy Buildings International

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

Regards,

Jennifer Rowe

Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure

T 02 4247 1851 | M 0488 988 6411 | E jennifer.rowe@planning.nsw.gov.au

PO Box 5475 | Level 2/84 Crown Street Wollongong, NSW 2500

(Work Days: Tuesday, Wednesday & Thursday)

www.dphi.nsw.gov.au



NSW
GOVERNMENT

The Department of Planning, Housing & Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically. Please note that I work flexibly. I'm sending this message now because it's a good time for me, but I don't expect that you will read, respond to or action it outside of your own regular hours.

 Please consider the environment before printing this e-mail

From: Sahiza Ali <sahiza.ali@dpie.nsw.gov.au> **On Behalf Of** DPE PSVC Compliance Mailbox

Sent: Monday, 30 March 2026 10:49 AM

To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Subject: Third Independent Audit – SSD 6687 – Uungula Wind Farm Consultation

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>

Sent: Monday, 30 March 2026 9:46 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin

<vince.chaplin@squadronenergy.com>

Subject: Third Independent Audit – SSD 6687 – Uungula Wind Farm Consultation

Dear Sir / Madam

RE: Third Independent Audit – SSD 6687 – Uungula Wind Farm Consultation

As the independent auditor engaged by Uungula Wind Farm Pty Ltd (SSD-6687 -as modified; Approval), I am consulting with DPHI on the scope of the **third** independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

Please refer to the details in the attached letter. Also included for information with the letter, is the DPHI Auditor Appointment with respect to the SSD 6687 Independent Audit(s).

We look forward to hearing from you before **30 April 2026** (or earlier, if possible) to enable meeting the audit schedule and requirements.

Yours sincerely

Maulik Bapodara

3 of 4





HBI

Healthy Buildings International

Independent Lead Environmental Auditor

Mobile: 0433 494 595 | E: maulik.bagodara@hbi.com.au
Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au





Subject: SSD 6687 – Uungula Wind Farm - Audit
Date: Monday, 18 May 2026 at 13:42:30 Australian Eastern Standard Time
From: Darryll Quigley
To: Maulik Bapodara
Attachments: image001.png, image002.png, ATT00001.png, ATT00002.jpg

Maulik,

I refer to your correspondence (email) below regarding a further audit of the site.

Council officers have reviewed various aspects of the development and it is only with regard to some roadworks that any issue is raised, as follows:

- Roadworks at the Goolma/Twelve Mile Road intersection appear to be complete, however this would require confirmation from TfNSW. As part of these works the original Twelve Mile Road section of the intersection has been permanently closed to the public and rehabilitation works are now complete. DRC had joint responsibility with TfNSW to ensure compliance with this condition.

I trust the comments provided are helpful in your audit of the development.

For any further information regarding this matter please contact me on (02) 6801-4656 during business hours or via return email.

Thanks



Darryll Quigley

Manager Building and Development Services

Building & Development Services

P 02 6801 4656

Darryll.Quigley@dubbo.nsw.gov.au

We acknowledge the traditional custodians of the Wiradjuri land where we work and their ongoing connections to land and community.

Your experience matters!
Click an icon to let us know how we went.



This e-mail, together with any attachments, is for the exclusive and confidential use of the addressee(s). Any other distribution, use of, or reproduction without prior written consent is strictly prohibited. Views expressed in this e-mail are those of the individual, except where specifically stated otherwise. Dubbo Regional Council does not warrant or guarantee this message to be free of errors, interference or viruses.

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Friday, 17 April 2026 10:11 AM
To: Dubbo Regional Council <council@dubbo.nsw.gov.au>; Darryll Quigley <Darryll.Quigley@dubbo.nsw.gov.au>
Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin <vince.chaplin@squadronenergy.com>

1 of 4





Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

⚠ CAUTION: This email came from outside the organisation. Be cautious clicking links and do not open attachments unless they are expected.

Good morning,

RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting with Dubbo Regional Council on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](https://planningportal.nsw.gov.au)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://nsw.gov.au)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period

2 of 4



- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
 - Out of Hours impacts
 - Noise and Vibration impacts
 - Visual and Lighting impacts
 - Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.





HBI

Healthy Buildings International



In providing input to the scope, we kindly request that DRC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8 May 2026** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au
Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

4 of 4





HBI

Healthy Buildings International

Subject: RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation
Date: Monday, 20 April 2026 at 12:34:02 Australian Eastern Standard Time
From: Development Renewables
To: Maulik Bapodara
CC: 'Dean Woods', 'Vince Chaplin'
Attachments: image001.png, image002.png, image003.png, image004.png

Hello Maulik,

TfNSW suggests that the Independent Environmental Audit scope consider:

- Compliance with Instrument of Consent transport-related conditions
- Implementation and enforcement of shuttle bus arrangements
- Management of construction traffic volumes during AM and PM peak periods
- Any pre-construction minor works mitigation measures and associated Planning Secretary approvals
- Implementation of the Traffic Impact Assessment (TIA) and Traffic Management Plans (TMPs)
- Commitments made within the Environmental Impact Statement (EIS)
- Assumptions underpinning the assessed traffic task within the TIA, including traffic distribution assumptions
- Effectiveness of mitigation measures detailed within the TMP
- Alignment between assessed and actual traffic volumes and vehicle characteristics
- Suitability of existing intersection treatments under cumulative background and project traffic
- Ongoing appropriateness of approved OSOM routes for the configurations being utilised
- Any incidents of non-compliance with mitigation measures, commitments or assessed traffic volumes, and measures implemented in response
- Audit report outcomes and recommended actions relevant to the State road network

Kind regards,

Rosa Gillogly

Development Services Support Officer
Development Services West
Transport Planning – Planning, Integration and Passenger
Transport for NSW

E rosa.gillogly@transport.nsw.gov.au

transport.nsw.gov.au

Level 1 51-55 Currajong Street
Parkes NSW 2870

1 of 5





HBI

Healthy Buildings International

I work flexibly. Unless it suits you, I don't expect you to read or respond to my emails outside of your normal work hours.



Transport
for NSW

I recognise and acknowledge that modern New South Wales is an overlay on Aboriginal land and that many of the transport routes of today follow songlines Aboriginal people have followed for tens of thousands of years. I pay my respects to the Aboriginal people of NSW and Elders past and present.

Please consider the environment before printing this email.

OFFICIAL

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Friday, 17 April 2026 10:18 AM
To: Development Renewables <development.renewables@transport.nsw.gov.au>
Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin <vince.chaplin@squadronenergy.com>
Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:
[Uungula Wind Farm \(SSD-6687\) – Development Consent – \(planningportal.nsw.gov.au\)](#)

The IAPAR is available at the following link:
[Independent Audit Post Approval Requirements – \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of

2 of 5



Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPFI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are



adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:

- Traffic and Road impacts
- Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
- Out of Hours impacts
- Noise and Vibration impacts
- Visual and Lighting impacts
- Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.



In providing input to the scope, we kindly request that TfNSW confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before 8 May 2026 (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au





HBI

Healthy Buildings International

Kind regards

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. Transport for NSW takes all care to ensure that attachments are free from viruses or other defects. Transport for NSW assume no liability for any loss, damage or other consequences which may arise from opening or using an attachment.

 Consider the environment. Please don't print this e-mail unless really necessary.

5 of 5





Subject: FW: Third Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation
Date: Tuesday, 21 April 2026 at 11:57:47 Australian Eastern Standard Time
From: Naomi Golightly on behalf of OEH ROGHD ROG North West Mailbox
To: Maulik Bapodara
CC: David Geering, vince.chaplin@squadronenergy.com, dean.woods@squadronenergy.com
Attachments: image001.png, image002.png, image003.png

Dear Maulik,

Thank you for your email to David Geering below.

We note the comprehensive list of items you have highlighted for your audit. CPHR has no new issues to raise for this audit that we have not raised previously.

Please direct future correspondence to our Conservation Planning and Assessments team - North at rog.nw@dcceew.nsw.gov.au so that it can be allocated appropriately.

Kind regards,

Naomi Golightly

A/Senior Team Leader Planning – North
Conservation Planning and Assessment

Conservation Planning and Offsets | Conservation Programs, Heritage and Regulation Group (CPHR)
Department of Climate Change, Energy, the Environment and Water (DCCEEW)

P 02 4927 3179 M 0455 660 690
E naomi.golightly@environment.nsw.gov.au
6 Stewart Avenue, Newcastle West NSW 2302
Locked Bag 1002, Dangar NSW 2309
dcceew.nsw.gov.au



From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Friday, 17 April 2026 10:20 AM
To: David Geering <David.Geering@dcceew.nsw.gov.au>
Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin <vince.chaplin@squadronenergy.com>
Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

Good morning,



**RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation**

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](https://planningportal.nsw.gov.au)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://nsw.gov.au)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans





are adequate

any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
 - Out of Hours impacts
 - Noise and Vibration impacts
 - Visual and Lighting impacts
 - Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.





HBI

Healthy Buildings International



In providing input to the scope, we kindly request that NSW DCCEEW CPHR confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before 8 May 2026 (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au





HBI

Healthy Buildings International

Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation
Date: Friday, 17 April 2026 at 10:14:43 Australian Eastern Standard Time
From: Maulik Bapodara
To: info@eps.nsw.gov.au
CC: Dean Woods, Vince Chaplin
Attachments: img-b2a0c3db-1eb8-417e-a6d2-14cc7615f5cf, img-13a62b57-79fa-4d54-a730-a60d4a61e670

Good morning,

RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried

1 of 3



- out when developing the scope of the audit
- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
 - Out of Hours impacts
 - Noise and Vibration impacts
 - Visual and Lighting impacts
 - Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to



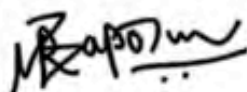
Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.



In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8 May 2026** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards



Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au





HBI

Healthy Buildings International

Subject: RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation
Date: Friday, 24 April 2026 at 10:28:46 Australian Eastern Standard Time
From: Alison Lamond
To: Maulik Bapodara
CC: Dean Woods, Vince Chaplin
Attachments: image001.png, image002.jpg, image003.png

Hello Maulik,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed. It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au.

Kind regards,

Alison Lamond *BSci, BA (Hons), (she/her)*
Strategic Manager – Major Projects
Heritage NSW
Department of Climate Change,
Energy, the Environment and Water

M 0419 762 918 E alison.lamond@dcceew.nsw.gov.au

dcceew.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

Working days Monday to Friday, 9:00am - 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Friday, 17 April 2026 10:28 AM
To: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>

1 of 4





Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin
<vince.chaplin@squadronenergy.com>

Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

Good morning,

RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](https://planningportal.nsw.gov.au)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://nsw.gov.au)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and Appendices 1 to 9
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any or a note to that effect)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- any other matters considered relevant by the auditor or the Department considering relevant



regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts
 - Out of Hours impacts
 - Noise and Vibration impacts
 - Visual and Lighting impacts
 - Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.





HBI

Healthy Buildings International



In providing input to the scope, we kindly request that Heritage NSW confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8 May 2026** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards

Maulik Bapodara
Independent Lead Environmental Auditor
Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

4 of 4





Subject: RE: F18/2514-2 Third Independent Audit - SSD 6687 - Uungula Wind Farm - Consultation CASA to Auditor [SEC=OFFICIAL]
Date: Thursday, 7 May 2026 at 14:27:15 Australian Eastern Standard Time
From: Alder, David
To: Maulik Bapodara
CC: Airspace Protection
Attachments: image001.jpg, image002.png, FW: F23/18016-1 - Uungula Wind Farm (SSD6687) - Draft aviation lighting plan for review [SEC=OFFICIAL].eml

OFFICIAL

Maulik

In response to your request: "CASA confirm any key issues it would like examined, relating to post-approval requirements and compliance"

Looking through our files, the latest Aeronautical Impact Assessment I can see is by Landrum and Brown of 21 February 2020.

Important information (not limited to):

Up to 97 Wind Turbine Generators (WTGs) that will be up to 250 m Above Ground Level (AGL) tip height.

The WTGs are located beyond the Obstacle Limitation Surface (OLS) of the nearest certified aerodrome - Mudgee Aerodrome.

No PANS-OPS surfaces are affected.

No Air Routes, / Lowest Safe Altitudes are affected.

Other info:

CASA reviewed the Aviation Lighting Plan on behalf of Squadron Energy (refer to enclosed email) and CASA still recommends Aviation Lighting.

There was an OBSTACLE LIGHTING RISK ASSESSMENT by Aviation Projects dated 05 May 2023.

It is noted that the Development Consent (May 2021)

Section B4 *The Applicant must: (b) ensure that any aviation hazard lighting complies with CASA's recommendations;*

Section B34. *The Applicant must carry out the development in accordance with the National Airports Safeguarding Framework Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers, or its latest version, unless the Secretary agrees otherwise.*

The above should cover everything that CASA needs.

One difference being with the NASF Guidelines being:

International standards require 2,000 candela lighting intensity on the nacelle (also recommended in the NASF guideline) and 200 candela at the mid-point of the turbine mast. CASA recommends that 200 candela as a minimum intensity lighting on the nacelle would suffice (due mainly to the lack of background lighting in the vicinity of the turbines).





HBI

Healthy Buildings International

We are not experts on Contract Conditions and would be reluctant to comment on a legally drafted document produced by an organisation that does infrastructure conditions all the time. The NASF Guideline recommends obstacle lighting for everything above 150m anyway and also covers marking.

Therefore, CASA has no key issues it would like examined.

We normally only liaise with the Planning Authority (We simply don't have the time for liaison with proponents and consultants). However, happy to drill down to specific detail if necessary.

Apologies for the waffle above - it was in case you are interested in the thought process.

Regards

David Alder
Aerodrome Engineer
Air Navigation, Airspace and Aerodromes Branch
ph : 02 62171342 m: 0455051611
18 Marcus Clarke Street, Canberra, ACT, 2605
www.casa.gov.au

From: Maulik Bapodara <maulik.bapodara@hbi.com.au>
Sent: Friday, 17 April 2026 12:38 PM
To: Jony.Hughes@airservicesaustralia.com; Airspace Protection <Airspace.Protection@casa.gov.au>
Cc: Dean Woods <dean.woods@squadronenergy.com>; Vince Chaplin <vince.chaplin@squadronenergy.com>
Subject: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

You don't often get email from maulik.bapodara@hbi.com.au. [Learn why this is important](#)
Good afternoon,

RE: Third Independent Audit - SSD 6687 – Uungula Wind Farm - Consultation

As the independent auditor, engaged by Uungula Wind Farm Pty Ltd, for the Uungula Wind Farm project (SSD 6687 - as modified; Approval), I am consulting on the scope of the **third** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

[Uungula Wind Farm \(SSD-6687\) – Development Consent - \(planningportal.nsw.gov.au\)](http://planningportal.nsw.gov.au)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](http://nsw.gov.au)

The audit is scheduled to commence with a site inspection on **13 May 2026** and pertains to post-approval requirements and compliance during Construction of the Uungula Wind Farm.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- An assessment of compliance with SSD 6687 (as modified) Schedule 1, Parts A, B, C, and

2 of 5





Appendices 1 to 9

- An assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - Actual impacts compared to predicted impacts documented in the environmental impact assessment
 - The physical extent of the development in comparison with the approved boundary
 - Incidents, non-compliances and complaints that occurred or were made during the audit period
 - The performance of the development having regard to agency policy and any environmental issues identified through consultation carried out when developing the scope of the audit
 - Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period
- The status of implementation of previous Independent Audit findings, recommendations, and actions (if any or a note to that effect)
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
- Any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition to the above, consultation has been undertaken with DPHI, and the following has been requested:

- Details of the works that have been undertaken so far at the Project.
- Review the clearing limits against the actual limits to the predicted limits. Records are being kept monitoring the restrictions on clearing and habitat, specifically to ensure compliance with the limits of Condition B20.
- Traffic Management specifically the requirements regarding transport limits and access routes in and out of the project including HV and OSOM, road upgrades and interaction with other projects (Wellington BESS etc). Also, that records are being kept monitoring compliance with the designated heavy and over-dimensional vehicle routes.
- Review environmental controls have been installed, maintained and are adequate, specifically in relation to managing water, noise and dust. Review the project is managing and implementing the requirements for:
 - Traffic and Road impacts
 - Pre-clearance works, especially in relation to exclusions zones regarding biodiversity and heritage impacts





- Out of Hours impacts
- Noise and Vibration impacts
- Visual and Lighting impacts
- Storage and Handling of Dangerous Goods
- Sediment and erosion controls are installed and in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)* and the relevant management plans.
- Are accurate records are being kept, specifically in relation to community complaints and actions.
- On 6 February 2026, the Department received notification of a naturally occurring asbestos incident at the project, review the actions associated as a result of the incident and whether the measures that have been implemented are appropriate, effective, and managing any further risks to the environment and community and exclusion zones are being maintained. Also check the appropriate notifications have been issued to relevant agencies and affected landholders and any recommendation have been implemented.
- There was a stockpile of material from the project, across from the entry to Wellington BESS (on land that was used previously for site offices for the project prior to moving onto site. Please review if the material is still there and if it is can you confirm the legality of that material ie is it complying with EIS and/or approval for it to be stored there.



In providing input to the scope, we kindly request that CASA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before 8 May 2026 (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Maulik Bapodara (Independent Lead Environmental Auditor) at maulik.bapodara@hbi.com.au

Kind regards

Maulik Bapodara
Independent Lead Environmental Auditor





HBI

Healthy Buildings International

Mobile: 0433 494 595 | E: maulik.bapodara@hbi.com.au

Infrastructure Sustainability Accredited Professional

Exemplar Global - EM AU TL - Lead Environmental Management Systems Auditor

Healthy Buildings International Pty Ltd

Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153

P: 02 9659 5433 | W: www.hbi.com.au

IMPORTANT:

This email may contain confidential or legally privileged information and may be protected by copyright. It remains the property of the Civil Aviation Safety Authority and is meant only for use by the intended recipient. If you have received it in error, please notify the sender immediately by reply email and delete all copies, together with any attachments.

5 of 5



APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

SITE INSPECTION NOTES AND PHOTOS	
	<p>Site entrance located at 1360 Twelve Mile Road, Wuuluman was observed to be a stabilised with asphalt and with appropriate project related signage. A water cart was in attendance for dust suppression. No dirt was observed. Water cart was deployed for dust suppression around the access tracks. Speed limit was also observed to be reduced to minimise dust.</p>
	<p>Rain water tanks and generators were observed to be in use at the site sheds, offices and amenities.</p>





HBI

Healthy Buildings International



Water cart observed on site minimising dust from haul roads/access tracks at the time of inspection



SQE provided evidence of stockpile removal from Goolma Rd/Twelve Mile Rd intersection worksite





HBI

Healthy Buildings International



Onsite weather monitoring station



Rock dams and asphalt installed around site entrance





Majority of access track works completed with final layer of pavement installed. No dust was observed from the site during site inspection.



No-go zones/project boundary fencing evident





Workshop area: refuelling tanks and generators were observed with fully stocked spill kits.



Workshop area: Various containers including correctly labelled/banded/ventilated containers were observed within the workshop area. Dangerous goods and chemicals are stored in this area.





Workshop area: Fully stocked spill kits were observed.



Workshop area: Skip bins were observed to be in use with waste type labels and separation of waste was evident.





HBI

Healthy Buildings International



Workshop area: Vehicle washdown area in place



Workshop area: Laydown area was observed to be neat and tidy.



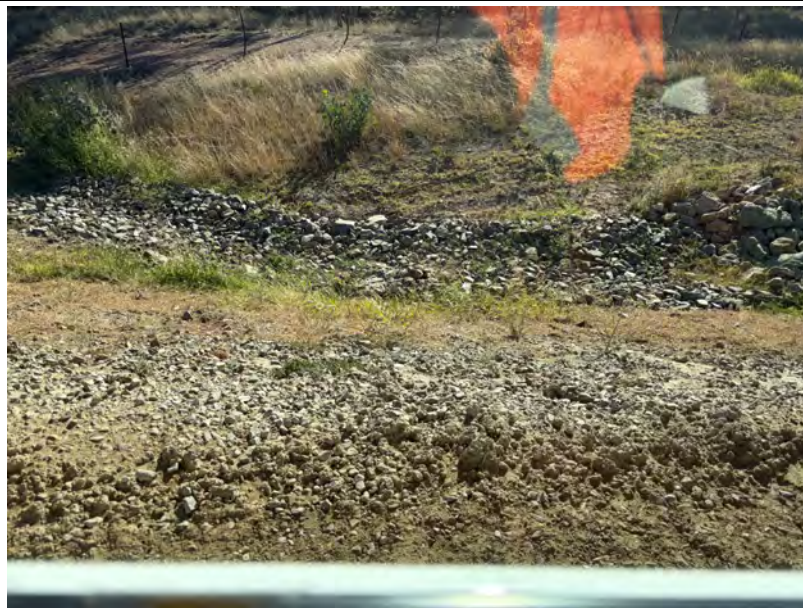


HBI

Healthy Buildings International



Embankment stabilisation/rehabilitation works underway



General: Sediment controls, rock check dams, mulch berms in place.





Transmission towers installed. Downer to ensure silt fences are maintained appropriately as required



Speed monitoring and speed warning systems installed around sites to ensure vehicles are following speed limits to minimise dust generation from haul roads/access tracks





Culverts installed and surrounding areas stabilised with polymer and rock checks



Transmission towers and power lines installed connecting substation and switching station





HBI

Healthy Buildings International



Mulch berms in place



Crusher plant being relocated





HBI

Healthy Buildings International



First OSOM deliveries for non-blade turbine parts



Creek crossing works completed with areas stabilised with rock





WTG foundation works ongoing



WTG foundation works ongoing





33kV overhead powerline works



WTG foundation works ongoing at PAD 102





WTG foundation backfilling and compaction ongoing at PAD 98



Naturally occurring asbestos area – exclusion zone in place with appropriate signage. Nacap reported that licenced asbestos hygienist in attendance and air monitoring ongoing. Regulatory notifications and community notifications in place. Stockpiles were observed to be stabilised with polymer.





HBI

Healthy Buildings International



Earthen bund and rock checks in place



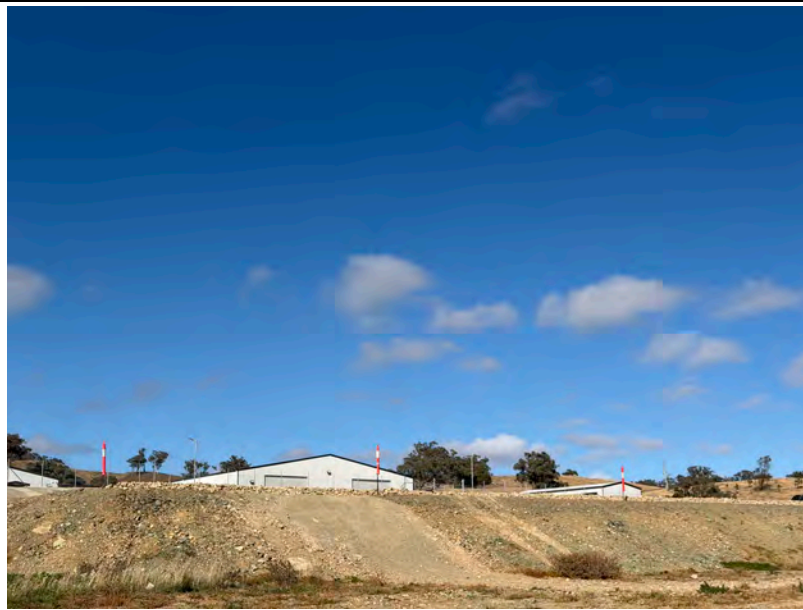
Rehabilitation around access tracks completed in majority of areas





HBI

Healthy Buildings International



Operation and Maintenance Building works nearly completed



Concrete batching plant operations ongoing.





Concrete agi washout area operations ongoing at the batching plant



Ongoing vehicle speed monitoring





HBI

Healthy Buildings International



Clean water diversion



Stabilised embankments





Transgrid Switching Station: Entry to Transgrid Switching Station was observed to be a hardstand. No dust/mud tracking was visible. Appropriate project signage in place.



Transgrid Switching Station: Final pavement installed on the access track





Transgrid Switching Station: Rock check dams in place in accordance with approved erosion and sediment control plans endorsed by the CPESC.



Transgrid Switching Station: Switching Station works ongoing. Security fence installed. Commissioning ongoing.





Transgrid Switching Station:
Landscaping works being planned



Transgrid Switching Station: Sediment basin operational for collection of stormwater, treatment and discharge/reuse of water onsite for dust suppression.





HBI

Healthy Buildings International



Transgrid Switching Station: Silt fence in place on the low point of retained stockpiles



Transgrid Switching Station: Existing Overhead Powerlines (550kV) to be connected to the Switching Station and UWF.





Transgrid Switching Station: Downer to maintain/assess the need to maintain existing silt fences (remove if not required or reinstate)



Transgrid Substation: Ongoing FRP works





HBI

Healthy Buildings International



Transgrid Substation: Oil/water separator tanks installed



Transgrid Substation: Sediment basin maintenance ongoing





Transgrid Substation: Concrete washout area observed to be satisfactory



Transgrid Substation: Drainage installed and protected





APPENDIX F – AUDIT REPORT DECLARATIONS



INDEPENDENT AUDIT REPORT DECLARATION FORM

Independent Audit Report Declaration Form – MAULIK BAPODARA

Project Name	Ungula Wind Farm
Consent Number	SSD 6687
Description of Project	Development of a wind farm with up to 69 wind turbines, with energy storage facility (ESF) and associated infrastructure. The proposal is to construct, operate, and ultimately decommission and a rehabilitate a commercial scale wind farm indicatively producing 400 MW of clean energy to power the equivalent of 170,000 average NSW households each year. The inclusion of an ESF will allow for the Project to store and dispatch scheduled and reliable energy to and from the Project or the National Electricity Market (NEM).
Project Address	Ungula Wind Farm, 14 km east of Wellington NSW
Proponent	Ungula Wind Farm Pty Ltd
Date	21 May 2026

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

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)





HBI

Healthy Buildings International



Name of Proposed Auditor	MAULIK BAPODARA
Signature	
Qualification	Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-462181.
Company	Healthy Buildings International Pty Ltd.

